

M. H. Hussain
17/4/18

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**BEFORE THE ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD.**

Mian Faqeer Hussain, Member Walton Cantonment Board, Ward No. 4, S/o Muhammad Ashiq, R/o Badian Road, H. No. E-2 56, 96B, Mohallah Shah Khawar Town, Bhatta Chowk, Lahore Cantt Lahore. (PP-162, NA-131)

REPRESENTATION
UNDER SECTION 21(3) ELECTIONS ACT 2017 READ
WITH RULE 12 OF ELECTION RULES 2017 REGARDING
ALTERATIONS OR MODIFICATIONS IN THE PRELIMINARY
LIST OF CONSTITUTENCY PP 162 LAHORE XIX

Respectfully Sheweth;

1. That the petitioner is a registered voter of PP-162 Lahore XIX and is desirous to contest from said Provincial Constituency.

As per notification No. F8(3)/2018-Elc-I dated 5th March 2018, the whole constituency has been changed without the knowledge of the petitioner in preliminary report of the list of constituencies of Provincial and National Assembly,

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published by the Election Commission of
Pakistan.

2. That the undersigned is aggrieved by the
new delimitation and seeks proposed
delimitation in PP-162/NA-131 without
bringing major changes in the constituency
of Lahore District inter-alia on the
following amongst other:-

GROUND

- a. That the new delimitation as published
in preliminary report and preliminary
list is against the provisions of
section 20 of the Election Act, 2017
read with rule 10 and 12 of Election
Rules 2017.
- b. That the petitioner proposes the
following changes in the delimitation

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for free, fair and impartial election
and in the interest of justice:-

- i. That charge 5 of Lahore Cantonment Board may be excluded from PP-162 and NA-131 and be included in PP-163 and NA-132.
- ii. Charge 7 of Lahore Cantonment Board may be excluded from PP-163 NA-132 and be included in PP-162 and NA-131.

The reasons for the above proposals
are as under:-

- (a) Charge 7 of Lahore Cantonment Board (PP-163/NA-132) is contiguous and adjoining with 11 Walton Cantonment Board PP-162/NA-131 which will form a compact constituency.

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(b) That according to the map proposed by the ECP, the voters of Charge 5 of Lahore Cantonment Board (PP-162/NA-131) has no direct access with remaining area of PP-162 / NA-131.

(c) That main Ghazi Road Bhatta Chowk bifurcates Charge 5 of Lahore Cantonment Board (PP-162/NA-131) from remaining area of PP-162/NA-131, whereas the Charge 7 of Lahore Cantonment Board (PP-163/NA-132) is contiguous to Charge 11 of Walton Cantonment Board (PP-162/NA-131).

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(d) The amendment proposed by the petitioner shall not affect the number of voters, rather it would facilitate the voters from National as well as Provincial Constituencies.

(e) Charge 5 of Lahore Cantonment Board (PP-162/NA-131) is contiguous to PP-163 / NA-132 and with this amendment the population of both the constituencies shall not be disturbed.

(f) Charge 5 of Lahore Cantonment Board (PP-162/NA-131) does not have any contiguousness with Charge 11 of Walton Cantonment Board (PP-162/NA-131).

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(g) In case the Charge 7 of Lahore Cantonment Board (PP-163/NA-132) having population 70,433 and Charge 5 of Lahore Cantonment Board (PP-162/NA-131) having population 72,899 are inter exchanged that would not affect the prescribed quota of population of National and Provincial Constituencies. For convenience the existing schedule of population as well as after proposed amendment is as under:-

Existing Population		Proposed Population	
NA-132	7,88,786	NA-132	7,91,252
PP-163	3,61,039	PP-163	3,63,505
NA-131	7,72,182	NA-131	7,69,716
PP-162	3,90,800	PP-162	3,88,340

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(h) That the relevant population census could be retained by bringing minor changes in both constituencies

(i) That the Geographical and Physical features of Charge 5 of Lahore Cantonment Board (PP-162/NA-131) and Charge 11 of Walton Cantonment Board (PP-162/NA-131) are unnatural and uncomfortable, whereas the geographical and physical features of Charge 7 of Lahore Cantonment Board (PP-163/NA-132) and Charge 11 of Walton Cantonment Board (PP-162/NA-131) are naturally,

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geographically and physically
combined with each other.

(j) That the proposed amendments
will not prejudice the case of
any other voter of the
constituency rather it will
facilitate the voters of the
constituency to cast their vote
for conduct of free, fair and
impartial election.

(k) That it is in the interest of
justice and also expedient for
the conduct of free, fair and
impartial elections that the
proposed amendments be allowed
and the new constituency be
declared with the afore-
referred proposed amendments.

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PRAYER

In view of the submissions made above, it is respectfully prayed that proposed alterations may kindly be accepted and boundaries of NA-131/PP-162 and NA-132/PP-163 may be kindly be revised and adjusted for the convenience of the population of both constituencies in accordance with the law and consequently the same may kindly be published in the final list of the constituency.

Any other relief to which the petitioner is found entitled may also be awarded.


Petitioner

Through

Muhammad Ramzan Ch.
Senior Advocate
Supreme Court of Pakistan
C.C No. PL.H-1479
Sohal Law Chambers,
7-Turner, Road, Lahore.