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**BEFORE THE ELECTION COMMISSION OF
PAKISTAN ISLAMABAD**

Zubair Ahmad S/o Muhammad Iqbal Javed R/o Sultan
key, P.O Khas Tehsil Raiwind, District, Lahore.

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 constituency PP-172
Lahore.

Respectfully Sheweth,

1. That the petitioner is voter member of UC 267 of
the said constituency. That the whole
constituency of former PP-161 has been changed
and divided into two new constituencies i.e PP-
172 and PP-173 without his knowledge in
preliminary report of the list of constituencies of
provincial & National Assembly.
2. That the undersigned is aggrieved by the new
delimitation and seeks amendments in the propose
delimitations in PP-172 and PP-173 without

- 2 -

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bringing major changes in both the constituencies of Lahore District, on the following

G R O U N D S

1. That the new delimitation as published in preliminary report and preliminary list is against the provision of section 20 of election Act, 2017 read with the rule 10 and 12 of the election rules 2017.
2. That the Election Commission in delimitation process of PP-173 has divided it in such a way that it has adjusted Union Council No. 267 partially in PP-172. This Union Council should be completely retained in the PP-173 due to their geographical compaction. It is to be noted that this Union Council has been partially adjusted in PP-172 without any justification and reason.
3. That the population required for the relevant population census could be retained by bringing minor changes in PP-173 and PP-172.
4. That as per new delimitation the suggested PP-173 Lahore is as follows:

PP-173 Lahore xxx.

- b. The following Census charges of Raiwind Tehsil.
 - Charge 26103 Maraka QH (Including Circle # 04, 06 & 07).

- Charge # 26104 Pajian QH
- Charges # 26105 Raiwind Rural QH
- Charge # 26106 Raiwind City QH
- The Following Charge of Model Town, Tehsil:
- Charge # 25903 Kahna Nu QH (Including Circle # 01, 02, 06).

TOTAL POPULATION 386,002

Copy of Map – PP-173 after delimitation is attached as Annex-A.

1. That the circles No. 4,6 and 7 of Charge No.3 of Tehsil Raiwind are part of PP-173 after the delimitation process.
2. That the circle No.4 of charge 3 belongs to Union Council No.267 of Tehsil Raiwind Geographically compacted with PP-173 whereas circle No.6 & 7 of charge 3 of PP-173 are geographically compacted with PP-172 and must become the part of the constituency of PP-172.
3. That if the circle No.1 of charge 2, of Tehsil Raiwind is added in to PP-173 it provides Geographical compaction and smooth communication and infrastructure to the population and connected administratively to each other.

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4. That the delimitations of both constituencies have not been done as mentioned in rule 10(5) of the election Rules 2017 according to which the delimitation of constituencies of an Assembly shall start from Northern end of the district, or, as the case may be the agency and then proceed clockwise in zigzag manner keeping in view that the population among the constituencies of an assembly shall remain as close as may be practicable to the quota. Hence the requirement of law has been overlooked in the delimitation process done by the commission.

5. It is settled law that census circles should not be divided and broken affecting the basic boundaries of the constituencies, whereas the same has been done against the procedure defined by law.

6. That as per amended delimitation of PP-172 and PP-173 have mixed the boundaries into each other without any justification and totally ignoring the principle of delimitation process.

7. That the following circles of charge No.2 have wrongly been added in PP-172.

- Circle No.1 of charge No.2.

- Total population of this circle is as follows:

- 8756

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8. That as per new delimitation structure, the distribution of population has been geographically compacted area facilitating the communication and roads approached with object for public convenience whereas the same has been over looked in the process of delimitation. Hence suggested proposal is forwarded for the delimitation of PP-173 keeping in view the requirement of law.

The proposed PP-173

- Charge 26102 Manga QH (Including the Circle #01).
- Charge 26103 Maraka QH (Including Circle # 04).
- Charge # 26104 Pajian QH
- Charges # 26105 Raiwind Rural QH
- Charge # 26106 Raiwind City QH
- The Following Charge of Model Town, Tehsil:
Charge # 25903 Kahna Nu QH (Including Circle # 01, 02, 06).

TOTAL PROPOSED POPULATION 362616

9. That by adding circle No.1 of Charge 2 in PP-173, the population of PP-173 effected by 8756,

whereas after excluding the circle No.4 & 6 of charge No.3 of Tehsil Raiwind from PP-173 and included in the constituency of PP-172 the population effected by 32142. These transfer of circles in proposed delimitation brought minor charges in both constituencies and fulfill all the requirements of law.

In view of the above submissions it is respectfully prayed that the proposed alterations may kindly be accepted and adjusted according to the proposal.

Any other relief which this Hon'able commission may deem fit and proper under the facts and circumstances of case may also be awarded to the applicant.

Petitioner

Zubair Ahmad
S/o Muhammad Iqbal Javed
ID. # 35202-4763484-1
Vote Number: 110
Ram Kot

Zubair Ahmad

Through

Ch. Miqdam Manzoor
S/o Ch. Manzoor Elahi
Advocate High Court

Ch. Miqdam Manzoor

Rao Tariq Mehmood
Advocate High Court

Rao Tariq Mehmood