

BEFORE THE HONORABLE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

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M. H. Khan
3/4/18

In the matter of:

Delimitation of the constituencies of Provincial Assembly in Tehsil & District Kasur.

REPRESENTATION ON BEHALF OF ABDUL AZIZ ZAHID S/O BASHIR AHMAD, R/O WARD No. 13, MOHALLAH, CHAUDHRIAN WALA, MUSTAFA ABAD, TEHSIL & DISTRICT KASUR IN RESPECT OF DELIMITATION OF THE CONSTITUENCY PP-175 KASUR (II) PROPOSED IN THE PRELIMINARY REPORT.

May it please be Your Honor:

That the brief facts leading to the filing of the present election petition are as under:

1. That the Petitioner/ objector a registered voter of the constituency PP-175 (Kasur-II). Previously, the constituency was PP-175 (Kasur I). The Objector is aggrieved of the delimitation of the constituency proposed in the preliminary report.

- *Copy of the CNIC of the objector is attached as Annexure-A*

2. That the District Kasur consists of four Tehsils (Kasur, Kot Radha Kishan, Patoki and Chunian) with a population of 3454996/- while the



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population of Tehsil Kasur is 1334563. According to the census 2017, the seats of the Provincial Assembly falling in Tehsil Kasur are PP-174, PP-175, PP-176 and Partially PP-182. The comparison of proposed delimitation of three constituencies by Election Commission is given in the following table.

| PP-175-(Kasur-II) | PP-176--(Kasur-III) | PP-182 (Kasur-IX) |
|---|--|--|
| (Population 375,483/-) | (Population 380,722/-) | (Population 404120/-) |
| (a) the following QHs of Kasur Tehsil 1. Mustafa Abad 2. Kasur-1 excluding Chak Buliana PC 3. Kasur-II 4. Bheela Hithar PC of Bheela Hithar QH (b) Mustafa Abad MC | (a). Ganda Singh Wala QH (b). Bheela Hithar excluding the following PC: (i) Bheela Hithar (c) Khudian QH (d) Khudian MC (e) Usman Wala excluding the following PCs: (i) Najabat (ii) Sandah Khan Wala (iii) Ganja Kalan (iv) Usman Wala (v) Pial Kalan | (a) Tehsil Radha Kishan excluding (1) Kot Radha Kishan-II QH (2) The following PCs of Kot Radha Kisha-I QH (i) But (ii) Chak No. 055 (iii) Baghaiar Mar (3) Hallar Ke Paimar PC of Bhamba-I QH (b) Raja Jang QH of Kasur Tehsil (c) Raja Jang MC |

- *Copy of the proposed plan of the constituencies by Election Commission of Pakistan is attached as Annexure-B.*

4. That the perusal and examination of the above proposed delimitation of the above constituencies is faulty, unnatural and offensive to the



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basic concept of the delimitation. Such delimitation may disfranchise a great number of voters, the detail whereof, is as under:-

1. The basic concept of the delimitation is that the constituencies are to be geographically compact which concept has totally been ignored:

(a) PC Lakhneke and Khara have been included in PP-182

but the said PCs of Raja Jang QH totally fall in PP-175 and surrounded by the areas of the said Constituency.

The highlighted part is shown in the Map annexed as

Annexure-C

(b) Kasur City falls in PP-174 and the said constituency

divides PP-175 into two parts Northern and Southern.

The highlighted part is shown in the map as Annexure-

D. The whole constituency requires crossing to approach the voters.

2. The crucial aspect of the connectivity and road links has also been ignored and a few instances are mentioned below.

(a) The areas falling in the South West of PP-175 has no

direct road link. Residents of PC Roshan Bheela, PC Bhalla and PC Hardosari etc are not directly

connected with other areas of the constituency of PP-

175 falling in the North e.g. Mustafa Abad, Badian,

Sarhali Kalan, Daftu and Chathian-wala etc.

(b) PP-176 starts from Nagar Aiman Pura in the East and

is spread over to the PC Khody in the West without



any main road link. The distance is more than 70 kilometers.

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(c) No direct road link is available to the voters in PP-182. e.g. The residents from PC Cheena Ottar etc cannot travel to Raja Jang or Sattoki Mir Muhammad etc. Voters of the constituency have to travel of about 45 kilometers from Cheena Othar to Mir Muhammad Sattoki.

3. The constituencies are proposed in a manner that the concept of public convenience has been altogether ignored. The distance is too long enough to provide convenience to the voters in one constituency at the cost of other constituencies.

(a) The administrative units have been divided and precinct of various police stations and Qanogoi Halqas, have been allocated to more than one constituencies. The areas falling in limits of single Police Station is divided in two constituencies.

(b) The direct approach has been neglected and the natural division of the constituencies on the parameters of the equal distribution of the population has not been taken into consideration.

(c) The segregated areas are included in the constituencies that have made whole of the exercise



of delimitation as contrary to the basic concept of delimitation.

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5. That keeping in view the basic concept of the delimitation, the equal distribution of population and fair division of geographical compact areas the constituencies can be suggested and finalized by the objector in the following manner:

| PP-175 (Kasur-II) | PP-176 (Kasur-III) | PP-182 (Kasur-IX) |
|--|---|--|
| Population: 396749/- | Population : 401,482/- | Population 394,924 |
| (i) QH Mustafabd of Tehsil Kasur (ii) Mustafabad MC (iii) Raja Jang QH of Tehsil Kasur (iv) Raja Jang MC (v) The following PC's of QH Kahur-I (a) Athil Pur. (b) Aurara (vi) The following PC's of QH Bhambha-II of Tehsil Kot Radha Kishan. (a) Matta PC (b) Ram Thaman PC (vii) PC Bhambha of QH Bhambha-I of Tehsil Kot Radha Kishan. | (i) MC Khudian of Tehsil Kasur (ii) QH Beela Hithar excluding following PC's (a) Gaggar (b) Tode Pur (c) Theh Sheikham (iii) QH usman wala excluding following PC's (a) Najabat (b) Sandah Khan Wala (c) Ganjan Kalan (d) Usman Wala (Gohar Jang) (e) Pial Kalan (iv) QH Kasur-I excluding following PC's (a) Chak Bilyana (b) Athil Pur (c) Aurara (d) Hardo sahari | (i) Tehsil Kot Radha Kishan excluding (a) Kot Radha Kishan II QH. (b) The following PC's of Kot Radha Kishan-I QH (i) But (ii) Chak No. 055 (iii) Baghiar Mar (ii) Bhamba-I QH excluding following PC's (a) Hallar Ke Paimar (b) Bhamba (iii) Khudian QH of Tehsil Kasur excluding Khudian MC. (iv) The following PC's of Bheela |



| | | |
|--|--|---|
| | (v) QH Kasur-II (vi) QH Ganda Singh Wala | Hithar QH of Tehsil Kasur. (a) Gaggar (b) Tode pur (c) Theh Sheikham (v) Hardo Sahari PC of Kasur-I QH |
|--|--|---|

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- *Copy of the suggested plan of the constituencies by objector is attached as Annexure-E*

- (6) That the above suggestions by the objector will cause the proportionate distribution of the population. The constituencies will fall within the limit less than 6 police stations. The road links and element of public convenience will be better served in the manner as aforesaid.
- (7) That the District Election Commissioner Kasur who conducted the physical survey of all the constituencies in Tehsil Kasur, proposed and recommended the demarcation of the boundaries but ignored the fact that the distances of the constituencies are disproportionate and the facility of transport as well as access to the polling stations will be impossible and inadequate which will cause unnecessary problems to the voters who will remain unfamiliar and will not be able to know where the polling stations are and to which constituency they belong to.
- (8) The areas allocated to the said constituencies are detached and urban areas are chalked out in a manner that the arrangement shall cause problem to the voters. The proposed delimitation will be problematic



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for the people of Tehsil as facilities of communication are not available to that level.

(9) That the urban areas of Khudian MC and the division thereof by including its adjoining areas in PP-176 will be in line with the provisions of The Election Act, 2017 and under the policy of the Election Commission of Pakistan.

(10) The exclusion of the adjoining area and inclusion of distant area requires reconsideration of the suggested delimitation of the constituencies.

(11) The maps of constituencies are attached with different colors to highlight the discrepancies and logical delimitation with appropriate changes for proper delimitation of the constituencies in District Kasur.

PRAYER

In the luminosity of aforementioned, it is therefore, most respectfully prayed that the proposed demarcation of Electoral Constituency PP-175 is unjust, illegal and against the basic foundation of the principles of delimitation of the constituencies hence the same may please be set aside.


It is further prayed that this Honorable Commission may be please to make the demarcation and process of delimitation a fresh in the light of the proposal as set out in the paragraph 5 above.



Any other relief that this Honorable Tribunal deems fit and proper in the circumstances may also be granted in the interest of justice.

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OBJECTOR/PETITIONER

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