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BEFORE THE HONORABLE ELECTION COMMISSION OF PAKISTAN

A/03/04/2018

Representation No. _____/2018

of

MR. NAVEED HAROON, SON OF HAROON UR RASHEED, RESIDENT OF
DHING SHAH, TEHIL AND DISTRICT KASUR, HOLDING CNIC NO. 35102-
8832704-3.

Applicant

**REPRESENTATION UNDER SECTION 21 OF THE ELECTION ACT,
2017 (THE ACT) READ WITH RULE 12 OF THE ELECTION RULES,
2017 (THE RULES) AND ALL OTHER ENABLING PROVISIONS OF THE
LAW, AGAINST THE:**

- I. DRAFT LIST OF DELIMITATION OF CONSTITUENCIES
PARTICULARLY IN RESPECT TO PP-176, KASUR III AND
GENERALLY RESPECTING THE NATIONAL AND
PROVINCIAL ASSEMBLY CONSTITUENCIES OF THE
DISTRICT KASUR, PROVINCE OF THE PUNJAB.**
 - II. THE ELECTION COMMISSION OF PAKISTAN'S REPORT
VIDE NOTIFICATION OF 05.03.2018.**
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Respectfully sheweth:-

A. PRELIMINARY SUBMISSIONS:

1. That the Applicant is a resident of Dhing Shah, District Kasur and is enrolled as a voter on the electoral rolls of:
 - (i) The Provincial Assembly constituency now numbered PP-176, District Kasur
 - (ii) The National Assembly constituency now numbered NA-138, District Kasur; and
2. That the Honorable Election Commission of Pakistan (the "ECP") got published the Preliminary Proposals for Delimitation of National and Provincial Assembly constituencies in the form of Form-5 (the "Preliminary Proposal") along with the ECP's Report dated 05.03.2018 (the "ECP's Report") for information of the general public in terms of Rule 11 of the Rules.
3. That, however, the district-wise maps of the proposed constituencies of the National and Provincial Assemblies (based on the Preliminary Proposal and the ECP's Report) were uploaded on the ECP's web-site Ten (10) days later i.e. on



15.03.2018. The maps for the Four (04) National Assembly constituencies and Nine (09) Provincial Assembly constituencies falling within District Kasur were also up-loaded on the ECP's website on the same day (the "Maps").

4. That the limitation period prescribed for filing of a representation under Rule 12(1) of the Rules read with Section 21(2) of the Act is a period of Thirty (30) days from the date of publication of the Preliminary Proposal and the ECP's Report under the aforesaid provisions of the law. The said period ends on 03.04.2018. Hence the instant Representation in the form of a Memorandum is being filed within the prescribed limitation period.

5. That it is respectfully averred:

(i) That from 1971 till 2002, Kasur District had a total of Four (04) National Assembly constituencies and Eight (08) Provincial Assembly constituencies as per the ECP Notification dated 25.06.1970 for delimitation of constituencies (Herein after referred to as the "Scheme of Delimitation-1970");

(Copies of the Delimitation Maps for District Kasur identifying the Four National Assembly constituencies and Eight Provincial Assembly constituencies as on 1970 are attached herewith as Annexure "A/1" to "A/2" respectively)

(ii) That the Applicant was enrolled as a voter from Dhing Shah on the electoral rolls of the National Assembly constituency bearing No. NA 106 and PP- 146 respectively under the **Scheme of Delimitation-1970**;

(iii) That from 1971 uptil prior to the 2002 General Elections, a total of Seven (07) general elections for National and Provincial Assemblies respectively were held on the basis of the aforesaid **Scheme of Delimitation-1970**;

(iv) That in 2002, vide ECP's Notification dated 28.06.2002 (available on ECP's website), the number of constituencies for National Assembly were increased from Four (04) to Five (05) and the Provincial Assembly constituencies were increased from Eight (08) to Ten (10) respectively (hereinafter referred to as the "**Scheme of Delimitation-2002**") without any cogent basis so as to facilitate the then Martial Law dictator, General Pervez Musharaf to win the next general elections.

(v) That pursuant to the The Scheme of Delimitation-2002, one National Assembly constituency (i.e. NA 140) and Two Provincial assembly constituencies (i.e. PP 179 and PP 180) were carved out in District Kasur. However, the said The Scheme of Delimitation-2002 was essentially based on the same principals and ground realities (i.e. historical, commercial, economic, agricultural, geographical, ethnic, linguistic, political and social) as those under the The Scheme of Delimitation-1970. This critical aspect has been dealt with in more detail in the Grounds for the Representation (see below) advanced by the Applicant herein. It is the Applicant's case that the said principals and ground realities on which the Scheme of Delimitation-1970 was based, have been completely ignored by the ECP when notifying the The Scheme of Delimitation-2018, without giving any cogent reasons whatsoever in the ECP's Report.

(vi) In this regard, the Applicant was enrolled as a voter on the electoral rolls of the National Assembly constituency bearing No. NA 140 and Provincial Assembly constituency of PP-179 under the Scheme of Delimitation-2002;

(vii) For ease of reference and homogeneity the Applicant herein shall make references to NA 140 which may be taken to include PP 179 wherever applicable.

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(viii) That vide ECP's Notification dated 05.03.2018, the number of National and Provincial Assembly Seats for District Kasur were reduced from Five (05) to Four (04) and Ten (10) to Nine (09) respectively;

(ix) That the Maps for the Four (04) National Assembly and Nine (09) Provincial Assembly constituencies were also up-loaded on the ECP's website on 15.03.2018 (the "Maps");

(Copies of (i) the Map for Four (04) National Assembly, and (ii) the Map for Nine (09) Provincial Assembly constituencies respectively issued/up-loaded by the ECP on 15.03.2018 are attached herewith as Annexure "B/1" and "B/2" respectively).

(x) That it is respectfully averred that it was upon the persual of the Preliminary Proposal, the ECP's Report and delimitation Maps issued by the ECP for District Kasur (herein after collectively referred to as the "Scheme of Delimitation-2018") that the Applicant realised the repercussions of the same on him, his community and the rest of District Kasur.

(xi) That under the Scheme of Delimitation-2018, the Applicant would be enrolled as a voter on the electoral rolls of the National Assembly constituency bearing No. NA-138 and Provincial Assembly constituency PP-176 respectively.

6. That it is most respectfully averred that the Applicant is aggrieved by the Scheme of Delimitation-2018, including the Preliminary Proposal, the ECP's Report as well as the Maps vis-à-vis the National and Provincial Assembly constituencies of District Kasur, *inter alia*, on the following grounds:

GROUNDS

1. That while preparing the List comprising of proposals for fresh delimitations of constituencies for Provincial Assemblies in Kasur District especially proposed Constituencies PP - 175, 176, 177, 178 and 182, it is respectfully submitted, the relevant Delimitation Committee failed to adhere to the fundamental and mandatory principles and procedures enshrined in the Act and Rules, in letter and spirit, hence the dire need to revisit the said delimitation proposal by this Honourable Commission. Furthermore, the Proposed Delimitation List 2018 appears to be in violation of conflict with Articles 51 and 106 of the Constitution of Pakistan, 1973 as it appears that the entire province of the Punjab has not been taken as one constituency.
2. That thorough consideration ought to have been given to the fact that since 1971 to the present delimitation, the geographical boundaries for the Provincial Assembly seat, which is now numbered PP-176 included the following Patwar Circles (PCs):
 - (i) Gohar Jagir; and
 - (ii) Pial Kalan.

The said Patwar Circles are intrinsically, historically and geographically connected. Not surprisingly, these 2 PCs are the weak areas for the encumbant candidates of the Ruling Party. Their exclusion repels against the principals of fairness, equity and reasonableness.

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3. That while preparing Delimitation Report for proposed constituency PP - 176, the Delimitation Committee excluded the aforementioned PCs and included the same in the proposed constituency of PP - 177. It is to be noted here that the said areas excluded from PP - 176 and included in PP 177 had throughout remained a part of such constituencies of the Provincial Assembly forming major parts of Kasur Tehsil in the delimitation of 1985 due to applicability of guiding factors such as geographical compactness, facilities of communication and public convenience and historical boundaries.
4. That the Delimitation Committee also lost sight of the fact that Patwar Circles including Thay Sheikhum, Guggar, TodayPur and Kotli Rai Abu Bakar have historically (2002) been an intergeral part of Nationaly Assembly constituency 139 (and was a part of PP 178) and thus out of NA 140 and PP 179. Similarly, Patwar Circles Joura and Bhala had been a part of NA 139 (2002). Hence, the said PC's have had no historical likanage with PP 176 and has been wrongly included. As a matter of common sence and law the said PC's should be included in PP 182 and PP 175 respectively (as suggested by the Applicant in the Proposed Scheme)
5. That pursuant to Section 20 of the Act, the principals of delimitation have been prescribed. In this regard, Section 20 of the Act provides as follows:

"20. Principles of delimitation.— (1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies."

6. It is averred that the Scheme of Delimitation-2018 is in violation of Section 20 of the Act as the same fails to follow the Principles of Delimitation contained therein. In this regard, it may be noted that Section 20 of the Act requires the ECP to have regard, *inter alia*, to the "distribution of population" in "geographically compact areas" and other cognate factors "to ensure homogeneity" in the creation of constituencies.
7. The Scheme of Delimitation-2018, which adopts a divide and rule policy, is a form a pre-election rigging and is therefore illegal and unconstitutional;
 - (d) This is clearly an attempt at "gerrymandering" the delimitation process through the use of "cracking", "stacking" and "packing" and delimiting the constituencies in such an unnatural manner that the influence of the existing communities and populations is substantially diminished so that certain favoured candidates of the ruling party in the urban areas (who would otherwise have no influence in the rural areas and thus no chance of contesting the elections) would suddenly be in a wining positions.

Therefore, the Scheme of Delimitation-2018 guarantees *heterogeneity* and division instead of *homogeneity* in the delimitation of constituencies in District Kasur, which would have devastating and far-reaching consequences for the settled urban and rural populations of District Kasur. It is thus averred that the Scheme of Delimitation-2018 is in violation of Section 20 of the Act and the Constitution and is liable to be set aside and conducted afresh in view of the Applicant's Proposal below.

4. That it may be noted that Section 20 of the Act requires the ECP to have regard, *inter alia*, to the "Physical Features" and other cognate factors to ensure

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homogeneity in the creation of constituencies. In this regard, the most important physical feature of District Kasur is the distinction between the “*Hitarh*” (or Low-lands) and “*Utharh*” (or Up-lands) as well as the North West to South East oriented irrigation system. It is averred that the said physical features are of great importance as the same have determined the history, culture, agriculture, economy, social life and political inclinations of the area. The Scheme of Delimitation-1970 as well as the Scheme of Delimitation-2002 squarely took the aforesaid physical features into account to ensure homogeneity. However, the ECP has completely disregarded the said Physical Features as it was legally required to do under Section 20 of the Act. Thus, the Scheme of Delimitation-2018 is illogical, unreasonable, arbitrary and is in violation of the Act, the Rules and the Constitution and is liable to be set aside and conducted afresh in view of the Applicant’s Proposal below.

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5. That it may further be noted that Section 20 of the Act requires the ECP to have regard, *inter alia*, to the “*facilities of communication and public convenience*” and other cognate factors to ensure homogeneity in the creation of constituencies. As adverted to above, all facilities of communication and public convenience, including roads, high-ways, railways, electricity, natural gas, canals etc. are oriented in a North West to South East direction. There are very few such facilities of communication and public convenience running in a North to South direction. By way of example, the Applicant’s village is linked to Kot Radha Kishan (some 50 kilometers away and now the closest major urban center to Dhing Shah in NA-138 under the Scheme of Delimitation-2018) by a single road, which is so broken and delapidated as to be un-usable. Moreover, there are no railway links between the southern and northern ends of NA-138. It is very difficult to understand why a North to South orientation was chosen in the Scheme of Delimitation-2018 over the existing North West to South East orientation under the Scheme of Delimitation-1970 as well as the Scheme of Delimitation-2002. Thus, the Scheme of Delimitation-2018 is illogical, unreasonable, arbitrary and is in clear violation of the Act and the Constitution and is liable to be set aside and conducted afresh in view of the Applicant’s Proposal below.

6. That furthermore, Rule 10(5) of the Rules lays down additional requirements for the delimitation of constituencies. In this regard, Rule 10(5) of the Rules provides as follows:

“10(5) As far as possible, the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or, as the case may be, the agency and then proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota”

(i) The word “*Zigzag*” appearing in Rule 10(5) of the Rules has not been defined in the Act or the Rules. Consequently, regard must be had to the ordinary dictionary meaning of the said word. In this regard:

(a) The word “*zigzag*” has been defined in the Oxford Dictionary¹ as follows:

“A line or course having abrupt alternate right and left turns”

(b) Similarly, the word “*Zigzag*” has been defined in The Free Dictionary² as follows:

“A line or course that proceeds by sharp turns in alternating directions.”

¹ <https://en.oxforddictionaries.com/definition/zigzag>

² <https://www.thefreedictionary.com/zigzag>



(ii) Furthermore, The word "Clockwise" appearing in Rule 10(5) of the Rules has not been defined in the Act or the Rules. Consequently, regard must be had to the ordinary dictionary meaning of the said word. In this regard:

(a) The word "Clockwise" has been defined in the Oxford Dictionary³ as follows:

"In a curve corresponding in direction to the typical forward movement of the hands of a clock"

(b) Similarly, the word "Clockwise" has been defined in The Free Dictionary⁴ as follows:

"In the same direction as the rotating hands of a clock."

(iii) On an harmonious constuction of the said words "**clock-wise**" and "**in a zigzag manner**" appearing in Rule 10(5) of the Rules and in light of the aforesaid definitions, it is averred that:

(a) The ECP was required to start the delimitation process of District Kasur by pin-pointing the northern most point therein, which, as per the Maps, is the northern-most point of Chatianwala Patwar Circle;

(b) The ECP was then required to delimit the first national and provincial assembly constituencies (i.e. NA-137, and PP-174 and PP-175) in its/their entirety, having regard, *inter alia*, to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies under Section 20 of the Act;

(c) Keeping in view the logistical, political, economic, agricultural, ethnic, linguistic and social factors adverted to above at length, the most natural and homogenous delimitation would have resulted in the ECP delimiting the said national and provincial assembly constituencies (i.e. NA-137, and PP-174 and PP-175) by reverting back, as closely as possible, to the Scheme of Delimitation-1970 which was on vogue for almost half a century (i.e. NA-107 under the Scheme of Delimitation-1970);

(d) Next, the ECP was required to move in a clockwise manner to the next national and provincial assembly constituencies (i.e. NA-138 and PP-176 and PP-177).

(e) Keeping in view the logistical, political, economic, agricultural, ethnic, ethnic, linguistic and social factors adverted to above at length, the most natural and homogenous delimitation would have resulted in the ECP delimiting the said national and provincial assembly constituencies (i.e. NA-138, and PP-176 and PP-177) by reverting back, as closely as possible, to the Scheme of Delimitation-1970 (i.e. NA-106 and PP 145 and PP 146 under the Scheme of Delimitation-1970) which was in vogue for almost half a century.

(f) The ECP was then required to move to delimit the remaining constituences of District Kasur in a like manner,

³ <https://en.oxforddictionaries.com/definition/clockwise>

⁴ <https://www.thefreedictionary.com/clockwise>

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- (iv) In this regard, it may be noted as follows:
- (a) As far as the constituencies of NA-139 and NA-140 (including PP 179) under the Scheme of Delimitation-2018 are concerned, the ECP has essentially reverted back to the same boundaries of the said constituencies as were in vogue under the Scheme of Delimitation-1970;
 - (b) Furthermore, on a perusal of the delimitation Maps issued/uploaded by the ECP for Districts Sahwal and Okara, it is apparent that ECP has once again essentially reverted back to the same boundaries of national assembly constituencies therein as were in vogue under the Scheme of Delimitation-1970;
 - (c) That however, as far as the constituencies of NA-137 and NA-138 under the Scheme of Delimitation-2018 are concerned, the ECP has adopted a completely different tactic. Rather than reverting back to the boundaries of national assembly constituencies under the Scheme of Delimitation-1970 (as the ECP has done in NA-139 and 140 of District Kasur and in Districts Sahiwal and Okara under the Scheme of Delimitation-2018), the ECP has delimited NA-137 and NA-138 and as a consequence PP 176 in a North to South direction sequentially from North West to South East as shown in the maps below:
 - (d) The ECP could have easily delimited NA-137 and 138 under the Scheme of Delimitation-2018 by reverting back to the delimitation of boundaries (i.e. NA-106 and NA-107 under the Scheme of Delimitation-1970) in the same manner as it has done in the adjoining national assembly constituencies of District Kasur (i.e. NA-139 and NA-140 under the Scheme of Delimitation-2018) as well as in Districts Okara and Sahiwal.
 - (e) That it is averred that had the delimitation of District Kasur conformed with the Scheme of Delimitation-1970 (barring minor changes), then the population quota requirements would have conformed with the Census, 2017 as well as ECP's own Notification dated 05.03.2018.
 - (d) Moreover, by reverting back to the original delimited boundaries of NA-106 and NA-107 under the Scheme of Delimitation-1970, virtually all the requirements of Section 20 of the Act and Section 10 of the Rules would have been fully complied with.
- (v) The adoption by the ECP of a completely new scheme of delimitation for NA-137 and 138 and thus the provincial assembly constituencies under the Scheme of Delimitation-2018 and rejection of Scheme of Delimitation-1970 [which has been implemented in the adjoining national assembly constituencies of District Kasur (i.e. NA-139 and NA-140 under the Scheme of Delimitation-2018) as well as in Districts Okara and Sahiwal]:
- (a) Is illogical, unreasonable, arbitrary and has the effect of disrupting the electoral process which is recognized by leading authorities as originating from delimitation;
 - (b) Is contrary to ECP's own previous practice;
 - (c) Is in disregard of the logistical, political, economic, agricultural, ethnic, ethnic, linguistic and social factors adverted to above;
 - (d) Is designed to favor candidates of the ruling party and dis-favor candidates from the opposition parties;



- (e) Is designed to disrupt and break up communities and social cohesion resulting in vote dilution;
- (f) Is in clear violation of the Act (specifically Section 20 thereof);
- (g) Is in clear violation of the Rules (specifically Rule 10(5) of the Rules);
- (vi) On the basis of the above, the Scheme of Delimitation-2018 is liable to be set aside and conducted afresh in view of the Applicant's Proposal below.
7. That furthermore, under Section 21(1) of the Act, the ECP was required to give detailed reasons and the basis on which the constituencies were delimited in the form of a Preliminary Report.
- (i) In this regard, Section 21 of the Act is reproduced below:
- "Section 20(1). Reports of Commission and list of constituencies.— (1) For the purpose of delimiting constituencies, the Commission may receive and consider representations, hold inquiries, summon witnesses and record evidence, and shall prepare and publish in the official Gazette a preliminary report and list of constituencies specifying the areas proposed to be included in each constituency.*
- (ii) That it is respectfully averred that the ECP's Report completely fails to take into account the aforesaid historical, commercial, economic, agricultural, linguistic, political, geographical as well as social factors vis-à-vis District Kasur. It may be pertinent to point out here that:
- (a) The ECP's Report does not even mention District Kasur therein;
- (b) The ECP's Report does not give any reasons whatsoever for not adhering to the Principles of Delimitation enumerated in Section 20 of the Act and Rule 10(5) of the Rules vis-à-vis District Kasur and interpreted succinctly by the Hon' able Superior Courts of Pakistan.
- (c) The ECP's Report does not provide reasons why the Scheme of Delimitation-1970 was completely disregarded, even though it would have fulfilled the Principles of Delimitation enumerated in Section 20 of the Act and Rule 10(5) of the Rules.
- (vi) Under the settled principles of law and equity, the aforesaid ECP's Report specified in Section 21 of the Act had to be based on principles of reasonableness, fairness, openness, transparency and for the advancement of the purposes of the enactment.
- (vii) However, the ECP's Report, has failed to take into account the aforesaid historical, commercial, economic, agricultural, linguistic, political, geographical as well as social factors offends against the principles of reasonableness, fairness, openness, transparency etc. adverted to above.
- (v) That it was the legal and constitutional duty of the ECP to explain in the ECP's Report why the ECP decided to completely abandon the aforesaid North West to South East scheme of delimitation and development in vogue for the past almost half a century and chose a delimitation scheme based on a North to South orientation, as it has done under the Scheme of Delimitation-2018.
- (vi) Therefore, the Scheme of Delimitation-2018 is liable to be set aside and conducted afresh in view of the Applicant's Proposal below.
9. The Applicant reserves the right to advance additional grounds, if the need so arises.

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1. That it is respectfully averred that having regard to the logistical, political, economic, agricultural, geographical, ethnic, ethnic, linguistic and social factors enumerated in the Gounds above, and in view of Section 20 of the Act and Rule 10 of the Rules, the Applicant hereby makes the following alternative proposal for the delimitation of the National and Provincial Assembly constituencies of District Kasur.
2. The Applicant hereby makes the following proposal for the delimitation of the Provincial Assembly constituencies of District Kasur keeping in view the Act and the Rules. In this regard, it may be noted that the Applicant's said Proposal for the delimitation of the Provincial Assembly constituencies of District Kasur:
 - (i) Is based, as nearly as possible, on the Scheme of Delimitation-1970 for District Kasur;
 - (ii) keeps in view the historical, logistical, political, geographical, economic, agricultural, ethnic, linguistic and social factors (as adverted to above);
 - (iii) Does not break any Patwar Circle;
 - (iv) Ensures that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota i.e. a population of around 383,888 per constituency.
 - (v) Does not violate Section Proviso to Rule 10(5) of the Rules whereby the population between two or more constituencies shall not ordinarily exceed Ten (10) percent;

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Applicant's Proposal for delimitation of the Provincial Assembly constituencies of District Kasur.

Serial No.	Number and Name of Proposed Constituency	Names of Areas included in the Proposed Constituencies of the Provincial Assembly for District Kasur	
1.	PP-174	PP-174 Kasur-I	
		NAME OF AREA	POPULATION
		KASUR MC I	358409
		CHAK BULIANA PC	21748
		TOTAL	380157
2.	PP-175	PP-175 Kasur II	
		NAME OF AREA	POPULATION
		MUSTAFABAD QH, EXCLUDING DAFTUH PC	90575
		KASUR I QH, EXCLUDING CHAK BULIANA PC	103156



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		KASUR II	84366
		MUSTAFABAD MC OF KASUR DIST	60654
		BHILA HITHAR PC	25250
		JOURA PC	12862
		BHALA PC	12401
		TOTAL	389,264
3.	PP-176	PP-176 KASUR III	
		NAME OF AREA	POPULATION
		GANDA SINGH WALA QH	97450
		FOLLOWING PC'S OF BHILA HITHAR QH:	
		SODI WALA PC	8519
		TARA GARH PC	14028
		GOHAR PC	11901
		KHUDIAN MC	38802
		USMAN WALA QH	117079
		TOTAL	381,258
4.	PP-177	TOTAL	364,519
5.	PP-178	PP-178 KASUR V	
		NAME OF AREA	POPULATION
		ALLAHABAD MC	61,933
		CHANGA MANGA QH	113,257
		CHUNIAN MC	72,678
		CHUNIAN I QH	32,379
		HALLAR KE PAIMAR PC OF BHAMBA I QH OF KOT RADHA KISHAN	8,366
		DHALLA KALAN PC	6,650
		RAKH DHALLA PC	6,470
		CHINAUTAR PC	24,812
		ALLAH ABAD QH (EXCLUDING IRZANI PUR, NARAIN SINGH WALA, ALLAH ABAD PC, GHAILAN HITHAR PC, MAULA PUR PC)	58,706
		TOTAL	385,251
6.	PP-179	PP-179 KASUR VI	
		NAME OF AREA	POPULATION
		CHUNIAN QH	122,212
		PATTOKI QH II	155,851
		PATTOKI MC II	87,737
		TOTAL	365,800
7.	PP-180	PP-180 KASUR VII	
		NAME OF AREA	POPULATION

M/07/04/2016

		HALLA QH	97,554
		SARAI MUGHAL QH	96,490
		PATTOKI QH I	106,706
		JAMBAR KALAN, EXCLUDING THE FOLLOWING PCs:	89,448
		BHOE ASAL PC	
		GHANDHU UTTAR PC	
		KAN WAIN PC	
		TOTAL	390,198
8.	PP-181	PP-181 KASUR VIII	
		NAME OF AREA	POPULATION
		BHOE ASAL PC	13,461
		GHANDHI UTTAR	11,551
		KAN WAIN	16,056
		PHOOL NAGAR QH	166,746
		PHOOL NAGAR MC	92,729
		KOT RADHA KISHAN II QH	46,859
		BAGHAIAR MAR PC	10,595
		BUT PC	9,647
		CHAK NO 055 PC	14,403
		MUDKE DHARI WAL PC	19,797
		TOTAL	401,844
9.	PP-182	PP-182 KASUR IX	
		NAME OF AREA	POPULATION
		TEHSIL KOT RADHA KISHAN, EXCLUDING KOT RADHA KISHAN II QH	
		THE FOLLOWING PC OF KOT RADHA KISHAN I QH:	
		BUT PC	
		CHAK NO 055	
		BHAGHAIAR MAR	
		RAKH DALLA PC	
		CHINA ATTAR PC	
		HALLAR KE PAIMAR PC OF BHAMBA I QH & II QH	212,731
		RAJA JANG QH OF KASUR TEHSIL	102,784
		RAJA JANG MC	30,876
		DAFTO MC	11,482
		TODEPUR PC	14,092
		THEH SHEIKHAM PC	11,270
		KOTLI RAI ABU BAKAR PC	5,784
		GAGGAR PC	7,686
		TOTAL	396,705

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		Total Population under the Applicant's Proposal	3,454,996
		Total Population of District Kasur as per the Census, 2017	3,454,996
		Difference	Nil

5. The Applicant's Proposed Delimitation Map conforming with the Applicant's aforesaid proposal for delimitation of the Provincial Assembly constituencies of District Kasur is also attached herewith as "Annexures B/1,2,3" which Annexures may be considered as an integral part of this Representation:

PRAYER CLAUSE:

In view of the above, it is respectfully prayed as follows:

- (a) That the Applicant Representation may kindly be accepted;
- (b) That the Applicant's Proposal for the delimitation of National and Provincial Assembly constituencies of District Kasur may kindly be accepted;
- (c) That the Scheme of Delimitation-2018 for District Kasur may kindly be conducted afresh keeping in view the Grounds advanced by the Applicant as well as the Applicant's Proposal;

[REDACTED]

[REDACTED]

8/03/09/2018

Any other relief as may be deemed appropriate in the circumstances may also be granted.



Reza Ali

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Through

N. Heercon
The Applicant / Petitioner
Date: 28.03.2018

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Sana Sana
Associate High Court

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HAFIZ ATIF RAZA
ADVOCATE HIGH COURT
& OATH COMMISSIONER
Lahore High Court, Lahore.
Registration No. Gen/X-B.9(b)
Expiry Date: 06-05-2020

Block Code : 189080520

