

- 1 -

**BEFORE SECRETARY ELECTION COMMISSION OF PAKISTAN,**  
**ISLAMABAD**

A/03/04/2018

**REPRESENTATION ON BEHALF OF SARDAR ATIF FAROOQ**  
**SON OF FAROOQ AHMAD RESIDENT OF VILLAGE**  
**KAISARGARH TEHSIL AND DISTRICT KASUR.**

Respectfully Sheweth:

1. That the objector is a bonafide resident of village Qaisar Garh, a voter in the old constituency PP- 176 (Kasur III). The name of the petitioner appears in the voter list of the said constituency and he holds a valid CNIC.
  - Copy of the CNIC is annexed herewith as Annexure-A
2. The process of delimitation of the constituencies in district Kasur was completed as per the census 2017 and according to the suggestions/preliminary report the objectors constituency (PP-176 Kasur III) has the following features:-
  - A) The population of the constituency of PP-176 is 380422.
  - B) It comprises of the following areas:



Handwritten signature and date: 03/04/2018

QH Ganda Singh Wala, Bheela Hithar excluding PC Bheela Hithar, QH Khudian, Khudian MC, QH Usman Wala excluding PC Najabat; PC Sanda Khanwala; Ganja Kalan; PC Usman wala; and PC Pial Kalan.

2. That suggested proposed delimitation of the constituency as per the preliminary report is unjust, improper and against the very principles of delimitation. The basic parameters of fair delimitation have been widely flouted and as such the same requires consideration.
3. That the proposed delimitation will not serve the very purpose of delimitation as the same has been proposed/suggested without keeping in view the factum of public convenience, geographical compactness and on the basis of the administrative units.
4. That the proposed delimitation will not serve any useful purpose and will cause inconvenience to the voters as well as it will disfranchise the citizens from their lawful right to vote in congenial circumstances.
5. The proposed delimitation in the wake of above facts is liable to be set aside on the following amongst other:-



## GROUND

- 9/03/09/2019
- a) The constituency, unlike other constituencies in district Kasur, is comprised of the largest territory with no direct road link from one end to the other. The perusal of the map reflects that it starts at one end from villages, Aimen Pura Nagar, Moyo Ki and Sahjra, and ends up in the west to the other end in patwar circle khoday etc. the distance is not in any manner less than 70 KM. PP-174 (Kasur-I) on the other hand is less than 15 KM from one end to another. Equal treatment has been denied and other constituencies are also with a distance much lesser than PP-176 (Kasur-III).
- b) The areas in PP-175 contentious to the constituency PP-176 have been erroneously included in PP-175 e.g Kasur-I excluding Buliana, Kasur-II Bhila Hithar PC of Bhila Hithat QH. The following areas in PP-176 are contentious with PP- 182 have been included in PP-176 without caring for geogorphical compactness of the two constituencies, Khudian QH, PC of Bheela Hithar QH, PC Ghaghar, PC Today Pur and PC Theh Shaikham.
- c) The proposal by the objector will not only reduce the area of the constituency, but will also resulting into equal distribution of the population as nearly as possible. The areas situated at the adjoining



Handwritten signature and date: 02/04/2018

boundaries of PP-182 are if excluded from PP-176 and included in PP-182 it will not only be convenient for the voters but will also be feasible from the angle of administration in the course of election.

- d) That PP-176 is directly connected to through from Lahore to Dipalpur via Kasur which is main road linking the population of the constituency. Its western side that has been wrongly included in the proposed delimitation on the other hand has no direct link with this road. The areas have their natural connection with the constituency 182 from every angle especially the public convenience, road links and geographical compactness.
- e) That viewing the above scenario it is respectfully suggested that PP-176 be reviewed in the manner as lightened in the attached map and shown in green color. The PP-182 and 175 as proposed by the objector is shown as pink and yellow respectively:-

- Copy of the suggested map of the constituency by the Election Commission is annexed as Annexure-B.
- Copy of proposed map of PP-176 as requested by the objector is annexed as Annexure-C.



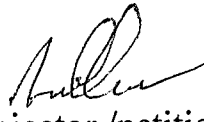


PRAYER

*Mp3/0/2018*


In the luminosity of the aforementioned encapsulations, it is therefore, most respectfully prayed that the demarcation of the constituencies as proposed in the preliminary report may please be set aside and the fresh delimitation as requested/suggested herein above by the objector may please be make in the larger interest of nation and of the population of inhabitants of district Kasur.

Any other relief which this Honorable Commission deems appropriate may also be granted to the objector/petitioner.

  
Objector /petitioner

Sardar Atif Farooq S/o Farooq Ahmed  
R/o Kaisar Garh  
Tehsil & District Kasur.  
0300-4346080

Through

  
**MUHAMMAD MOHSIN MALIK**  
Advocate High Court

