

BEFORE THE ELECTION COMMISSION OF PAKISTAN

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102/09/2018

Representation under Section 21 of the Elections Act 2017 read with Rule 12 of the Election Rules 2017 in respect of the delimitation of constituencies of Provincial Assembly of District Kasur with regard to PP-179 and PP-180

It is respectfully submitted as under;

1. The petitioner is a permanent resident and voter of proposed PP-180 Kasur. He has strong social and economic ties to the surrounding area. Certification of voter list of petitioner is attached as Annexure "A"
2. That through the delimitation process pertaining to the PP-179 constituency and on the basis of the Preliminary Delimitation Report 2018 published by this Hon'ble Commission on 05-03-2018, whereby the PP 179 Constituency has been delimited in the following manner;
 - (a) The following QH of Chunia Tehsil;
 1. Chunian-II QH
 - (b) Pattoki-II QH
 - (c) Pattoki MC
Of District Kasur
3. That through the delimitation process pertaining to the PP-180 constituency and on the basis of the Preliminary Delimitation Report 2018 published by this Hon'ble Commission on 05-03-2018, whereby the PP 180 Constituency has been delimited in the following manner;
 - a. The following QH's of Tehsil Pattoki;
 - i. Halla QH.
 - ii. Sarai Mughal QH.
 - iii. Pattoki-I QH.
 - iv. Jambar Kalan QH excluding the following PCs:
 - (i) Bhoel Asal
 - (ii) Gandhi Utar
 - (iii) Kanwain

Of District Kasur

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The constituencies as preliminarily delimited by the ECP are attached as Annexure "B".

4. That through the instant representation, the petitioner seeks the indulgence of this Hon'ble Commission to delimit the above constituencies in the following manner;

Sr. #	No and Name of Constituency	Proposed amendments, of the Constituency	Proposed final constituency
1.	PP-179	<p>Include</p> <p>The following PC's of Pattoki-I QH of Tehsil Pattoki;</p> <p>i. Narroki Majh PC, population, 24,388.</p> <p>ii. Wan Adhan PC, population, 10,055.</p> <p>Exclude</p> <p>The following PC of Pattoki-II QH</p> <p>i. Sheikham Population, 23,267</p>	<p>a. Chunian-II, QH, population, 122,212</p> <p>b. Pattoki, MC population, 87,737</p> <p>c. Following PC's of Pattoki-I QH</p> <p>i. Narroki Majha Population, 24,388.</p> <p>ii. Wan Adhan Population, 10,055.</p> <p>d. Pattoki-II QH excluding following PC:</p> <p>i. Shekham Population, 132,584</p> <p>of Kasur District.</p> <p>Total population of proposed PP179; 376,976.</p>
2.	PP-180	<p>Include</p> <p>The following PC of Pattoki-II QH</p> <p>i. Sheikham Population, 23,267</p> <p>Exclude</p> <p>The following PC's of Pattoki-I QH of Tehsil Pattoki;</p> <p>i. Narroki Majh PC, population, 24,388.</p>	<p>a. Hala QH, population 97,554.</p> <p>b. Sarai Mughal QH, population, 96,490.</p> <p>c. Following PC of Pattoki-II QH:</p> <p>i. Sheikham, population, 23,267</p> <p>d. Pattoki-I QH excluding the following PC's:</p> <p>i. Narroki Majha</p> <p>ii. Wan Adhan Population, 72,263</p>

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		ii. Wan Adhan PC, population, 10,055.	e. Jambar Kalan QH excluding the following PC's i. bhoje Hasil ii. Gandhi Utar iii. Kanwain Population, 89,448 Total population of proposed PP-180:, 379,022.
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That the Delimitation Map as proposed by the Petitioner is attached as Annexure "C" and the PCs to be included in PP-179 and excluded from PP-180 are highlighted in Orange colour and the PCs to be excluded from PP-179 and included in PP-180 are highlighted in Green colour.

5. That it is pertinent to mention here that the Petitioner does not seek any amendment or alteration in the remainder of Provincial Assembly seats of District Kasur namely PP-174 to PP-178, PP-181 and PP-182.
6. That feeling aggrieved with the part of list of the constituencies published in the Preliminary Delimitation Report 2018, the Petitioner seeks the indulgence of this Hon`ble Commission for making amendments, alterations, and/or modifications as suggested/proposed by the Petitioner on the following grounds;

GROUND S

- A. That the Preliminary Delimitation Report with regard to the PP-179 and PP-180 has failed to adhere to the principles and procedures of delimitation as provided in S. 20 of the Elections Act 2017 read with Rule 10 of the Election Rules 2017 and therefore there is a need to re-visit the said delimitations proposed by this Hon`ble Commission.
- B. That the delimitation is to be done while considering amongst others, the public convenience, facilities of communication and physical features.
- C. That while preparing the delimitation report for the proposed constituencies PP-179 and PP-180, the Delimitation Committee has included, PC Naroki Majha and

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PC Wan Adhan of Pattoki-I QH in pp180 whereas previously both the PC's were in former constituency falling in pattoki city. Both PC's are quite literally part of pattoki city and public convenience as well as physical features mandate them to be part of PP-179 wherein the Pattoki city falls.

- D. That Chak No.19 Mandian Wala is part of PC Narroki Majha (currently PP-180) and is quite literally on the opposite side of pattoki city. To put things into perspective, Chak.19 Mandian wala is on one side of Pattoki city and the rest of PP-180 is on the other side of Pattoki City. Whereas pattoki city is part of PP-179. This arrangement is neither geographically compact nor publically convenient.
- E. That the Petitioner is resident of Chak No.41 Khudian, the said chak is adjacent to PC shiekham. Pc Shiekham has been wrongly included in PP-179. Geographically PC sheikh ought to have been included in PP-180.
- F. That PC Sheikham of Pattoki-II QH has been part of the current entire PP-180 primarily comprising of amongst others, Halla QH and Sarai Mughal QH. PC sheikhem has been part of constituency having Sarai Mughal QH and Hala QH. The city of sarai Mughal also has the police station and is the main line of communication of the populous of PC Sheikham. Thus in order to ensure homogeneity, it is imperative that the said PC is excluded from PP-179 and included in PP-180.
- G. That the additions as proposed, will balance the population of both the PP-179 and PP-180 constituencies and will be far more convenient for the voters of the identified areas to be part of the respective proposed constituencies.
- H. That if the proposal for delimitation of PP-179 and PP-180 made by the Delimitation Committee in its Preliminary Delimitation Report 2018 is finalized without incorporating amendments, alterations, or modifications proposed/suggest by the Petitioner in above, the entire population of the above-detailed Patwar Circles would suffer irreparable loss and hardships.
- I. That it is respectfully submitted that it is a paramount principle of delimitation that the process must take into regard, the distribution of population in geographically compact areas, existing boundaries of administrative units,

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facilities of communications and public convenience and other cognate factors to entire homogeneity in the creation of constituencies; the proposed delimitation in paragraph 4 takes all these factors into account which have been omitted in the Preliminary Delimitation Report.

- J. That the amendments, alterations or modifications proposed/suggested by the Petitioner in paragraph 4 above are for the sole purpose of providing facilities and to provide ease to the inhabitants of the said areas.

In view of the foregoing, it is most respectfully prayed that the instant representation may kindly be accepted and the amendments, alteration, or modifications proposed/suggested by the Petitioner in paragraph 4 of this representation may kindly be incorporated in the final report and list constituencies showing the areas included in each constituency as stated.

Any other relief which this Hon`ble Commission may deem just and appropriate may also be granted to the Petitioner in the interest of law, justice and equity

Petitioner

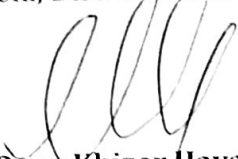


Chauhdry Muhammad Aslam Khan S/o. Chaudhry Banae Khan

CNIC No. 35202-8154067-7

Resident of Khudian Chak No.41
Tehsil Pattoki, District Kasur

Through



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Advocate High Courts




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