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BEFORE THE ELECTION COMMISSION OF PAKISTAN
ISLAMABAD

Before: Representation Petition No. _____ / 2018

The Secretary (ECP) Secretariat, Election House,
Constitution Avenue, G-5/2, Islamabad.

On behalf of:

1. Abdul Sattar son of Rafi Muhammad, resident of Faujianwali, Khanke Mor, Tehsil Patoki, District Kasoor
2. Muhammad Sarwar son of Shafi Muhammad, resident of Ward No.3, Khanke Mor, Tehsil Patoki, District Kasoor
3. Liaqat Ali so of Muhammad Mustafa (Late), resident of Khanke Mor, Tehsil Patoki, District Kasoor

...Applicants/Petitioners

**REPRESENTATION UNDER SECTION 21(3) OF THE
ELECTION ACT 2017 READ WITH RULE 11 (4) OF THE
ELECTION RULES 2017 FOR THE DE-LIMITATION OF
THE PROPOSED CONSTITUENCY NO.PP-181 KASOOR
IN THE PRELIMINARY REPORT**

ABSTRACT

Petitioners being the local resident representatives propose a change in the constituency PP-181 Kasur with the following observations:

- (a) That the petitioners are enrolled as a voter in the constituency No. PP=180, Kasur.
- (b) That the preliminary delimitation of constituencies has been published through public notice by the respondent. Copy of notice is attached.
- (c) That the preliminary delimitation of constituency NO.PP-180, Kasur is against law, facts, rules, procedures, principles and provisions as well as sections laid down in the delimitation Act 2017.
- (d) That there is gross violation of laws, rules, principles and sections of delimitation rules 2017.
- (e) That the delimitation of PP-180 along with PP-181Kasur is liable to be rectified to the extent of prayer of the petitioners to meet the ends of justice and to be in accordance with rules, provisions, laws sections laid down in the delimitation Act 2017.

1. Khanke Mor presently proposed in PP-180 be removed/excluded and added in PP-181.

2. The population of "Khanke Mor" is 16,300/-. The reasons for praying this are as follows:

- a) Patwar circle Khanke Mor has always been an integral part of the main urban area Phool Nagar which is in PP-181.

- b) All the public facilities and public utilities of Phool Nagar are available and used by the inhabitants of Khanke Mor being adjacent to urban area of Phool Nagar. The relations of Khanke Mor and their business interests are in the commercial areas of Phool Nagar. The relationships (Baradarism) the land contiguity and its situation justifies the addition of Khanke More into PP-181 as it's the public convenience that is to be primarily considered.
- c) Since "Khanke Mor" has been an integral part of the same land mass i.e. now been proposed to be added in PP-181. It would be relevant to mention here that since last five decades, the three Zila Council Chairman Rana Muhammad Iqbal, Rana Muhammad Ishaque and Sikandar Hayat, all Members/Chairman of the Union Council "Khanke Mor" have been elected as Zila Council Chairmen over the area now form PP-181 which establishes the fact that Khanke Mor is an integral part of the area comprising in PP-181.
- It would be further relevant to mention that the exclusion of "Khanke Mor" Patwar Circle is intentional,

not a bonafide error and tantamounts to an unwarranted burden and may be due to "gerrymandering" as the exclusion of Khanke Mor is actually creating a political gap in PP-181.

4. The patwar circles "Roosa Bhel" population 21,000 and "Buchoke Majah" population 6,062, of these two patwar circles have been missing from the constituencies PP-181 or PP-182 adjacent to them.
5. They are not being shown as the part of any PP constituency.
6. There has been a bonafide mistake/error which has crept into the record of PP-181 duly notified which shows as population of 3,82,047/- when calculated in accordance areas form part of PP-181 which are as follows:

i)	Bhoe Asal PC	13461
ii)	Gandhi Utar PC	11551
iii)	Kanwen PC	16056
	Of jumber Kalan QH	
iv)	Phool Nagar Qanongo Halqa (QH)	166746
v)	Phool Nagar MC	92729
vi)	Mudke Dhariwal PC of	19797
	QH 2 Kot radh kishan	

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vii) But PC	9647
viii) Chak 55 PC	14403
ix) Baghiar Mar PC	10595
Total:	354,985

Thus there is a difference of 27062 population in the total calculation as notified by the Election Commission of Pakistan which is 382,047.

Therefore, in case the Khanke Mor is added, the natural result would be the total population 354,985 can be reached.

Population balance: In case "Khanke Mor" 16,300 is taken away out of 390,198 of PP-180 the remaining population shall be 3,73,898 and shall remain within 10% threshold.

PROPOSAL

a. The Quota per seat for the province of Punjab and existing population as per 2017 Census is given under:

- i. Quota per seat = 370,000 with 10% plus minus.
- ii. Existing Population of PP-181 = 382,047
- iii. Existing population of PP-180 = 390,198

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Therefore the proposed exclusion of Khanke More PC having Population of 16,300 being proposed in PP-180 and be removed and added into PP-181, does not alter the population distribution of the constituencies; After the above-mentioned proposal the new population for PP-181 and PP-180 shall become;

iv. Existing Population of PP-181 = 382,047

- By ADDITION of 16,300 population of Khanke Mor PC, makes the population of PP-181 = 398,347.

v. Existing population of PP-180 = 390,198

- By reduction of 16,300 population of Khanke Mor from PP 180, makes the population of PP-373,898 which falls within the Quota.

b. The above mentioned facts and grounds shall make the population distribution of the PP-180 and PP-181 as under:

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NA No.	Proposed Population Distribution by Election Commission of Pakistan (ECP) for 2018 Election	Proposed/Suggested by The Applicants
180	390,198	373,898
181	382,047	398,347

PRAYER:

It is respectfully prayed that "Khanke MOR" may be excluded from PP-180 and added in PP-181 to satisfy the parameters of De-Limitation.

Any other equitable relief which this Honourable Court may deem fit and necessary may also be granted.

محمد سرور (ناایافت ملی بقلم خود)

A. Sattan
Petitioner

Through Counsel

(MALIK QAMAR AFZAL)
Advocate Supreme Court

(SYEDA SUMMERA NAQVI)
Advocate High Court

(AHMAD RAZA MANGAT)
Advocate High Court

(SAAD KHAN)
Advocate High Court

Dated: 30-03-2018