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BEFORE THE ELECTION COMMISSION OF PAKISTAN

(1-4)

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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-181 and PP-182

It is respectfully submitted as under;

1. The petitioner is a practicing advocate, elected Chairman Union Council NO.112 namely Mudkey Dhariwal, Tehsil Kot Radha Kission, District Kasur., permanent resident and voter of proposed PP-181 and NA138 Kasur. The petitioner is a candidate for upcoming general elections from the proposed PP;182. Certification of voter list along with election result and nakal jama bandi and license of petitioner is attached as Annexure "A".
2. That through the delimitation process the union Council namely Mudkey Dhariwal from which the Petitioner is an elected chairman has been included in proposed PP-181 on the basis of the Preliminary Delimitation Report 2018 published by this Hon`ble Commission on 05-03-2018. The constituencies as preliminarily delimited by the ECP are attached as Annexure "B".
3. 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 alterations and/or modifications of the Constituency	Proposed final constituency
1.	PP-181	Include The following PC's of Kot Radha Kission-1, Qh Tehsil Kot Radha Kission; i. Zafar Ke PC, Exclude The following PC of	a. Following PC's of Jamber Kalan QH, i. Bhoie Hasil ii. Gandhi Utar iii. Kanwein

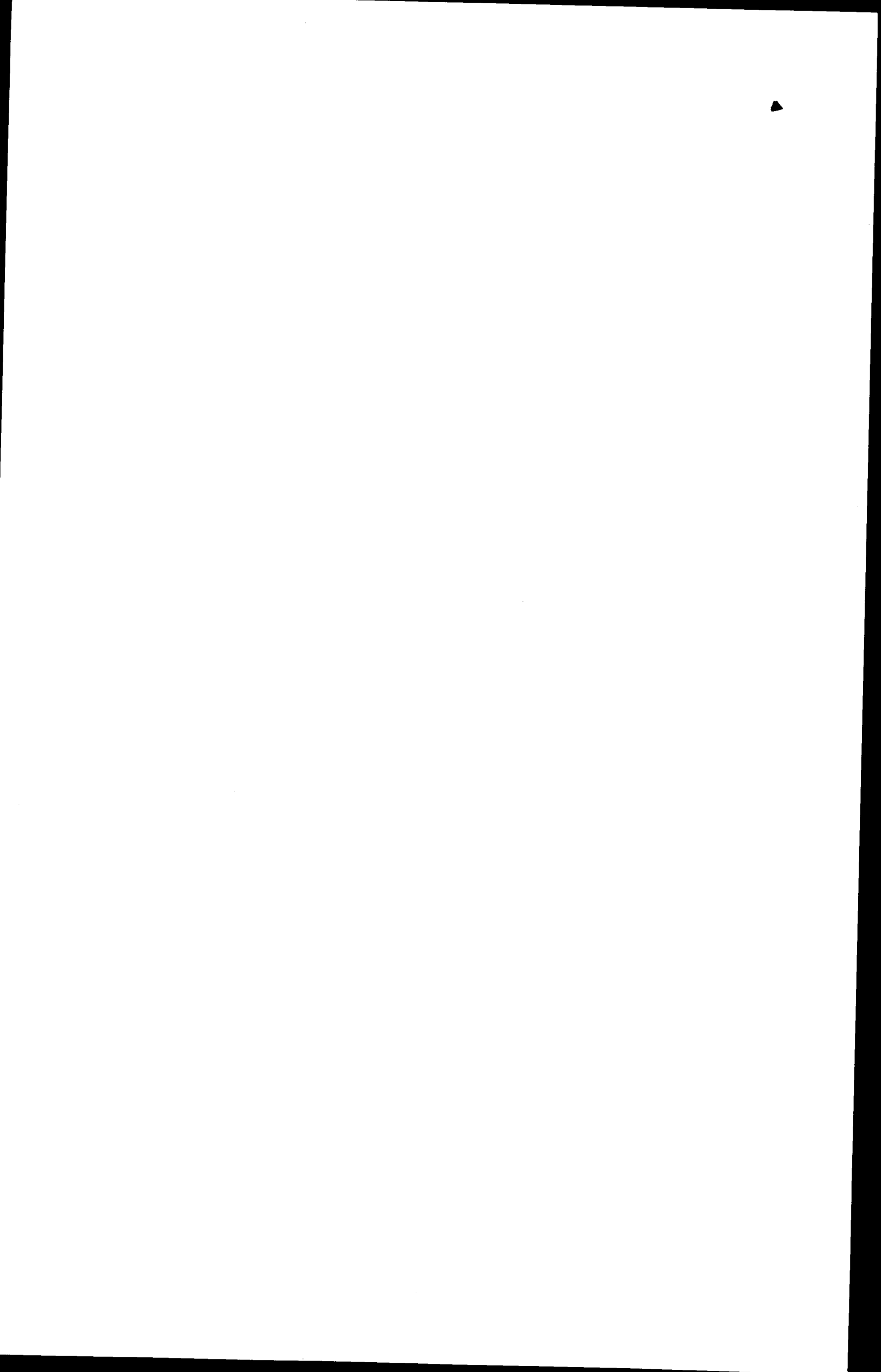


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		<p>Kot Radha Kission-II QH</p> <p>i. Mudkey Dhari Wal PC</p>	<p>b. Phool Nagar QH</p> <p>c. Phool Nagar MC</p> <p>d. The following PC's of Kot Radha Kission-1 QH</p> <p>i. But</p> <p>ii. Chak No.55</p> <p>iii. Bhagiar Mar</p> <p>of Kasur District.</p> <p>Total population of proposed PP179: 361,262.</p>
2.	PP-182	<p>Include</p> <p>The following PC's of Kot Radha Kission-II, Qh Tehsil Kot Radha Kission;</p> <p>i. Mudkey Dhari Wal PC,</p> <p>Exclude</p> <p>The following PC of Kot Radha Kission-II QH</p> <p>ii. Zafar Ke PC</p>	<p>a. Tehsil Kot Radha Kission excluding:</p> <p>1. The following PC's of Kot Radha Kission-I QH</p> <p>i. But</p> <p>ii. Chak No.55</p> <p>iii. Bhagiar Mar</p> <p>2. Hallar ke Paimar PC of Bhamba-I QH</p> <p>b. Kot Radha Kission-II QH</p> <p>c. Raja Jang QH of Kasur Tehsil</p> <p>d. Raja Jang MC</p> <p>Of Kasur District</p> <p>Total population of proposed PP-182, 418,843.</p>

That the Delimitation Map as proposed by the Petitioner is attached as Annexure "C" and the PCs to be included in PP-181 and excluded from PP-182 are highlighted in Pink colour and the PCs to be excluded from PP-182 and included in PP-181 are highlighted in Green colour.

4. That the Petitioner does not seek any amendment or alteration in any other constituency of Provincial Assembly seats of District Kasur.

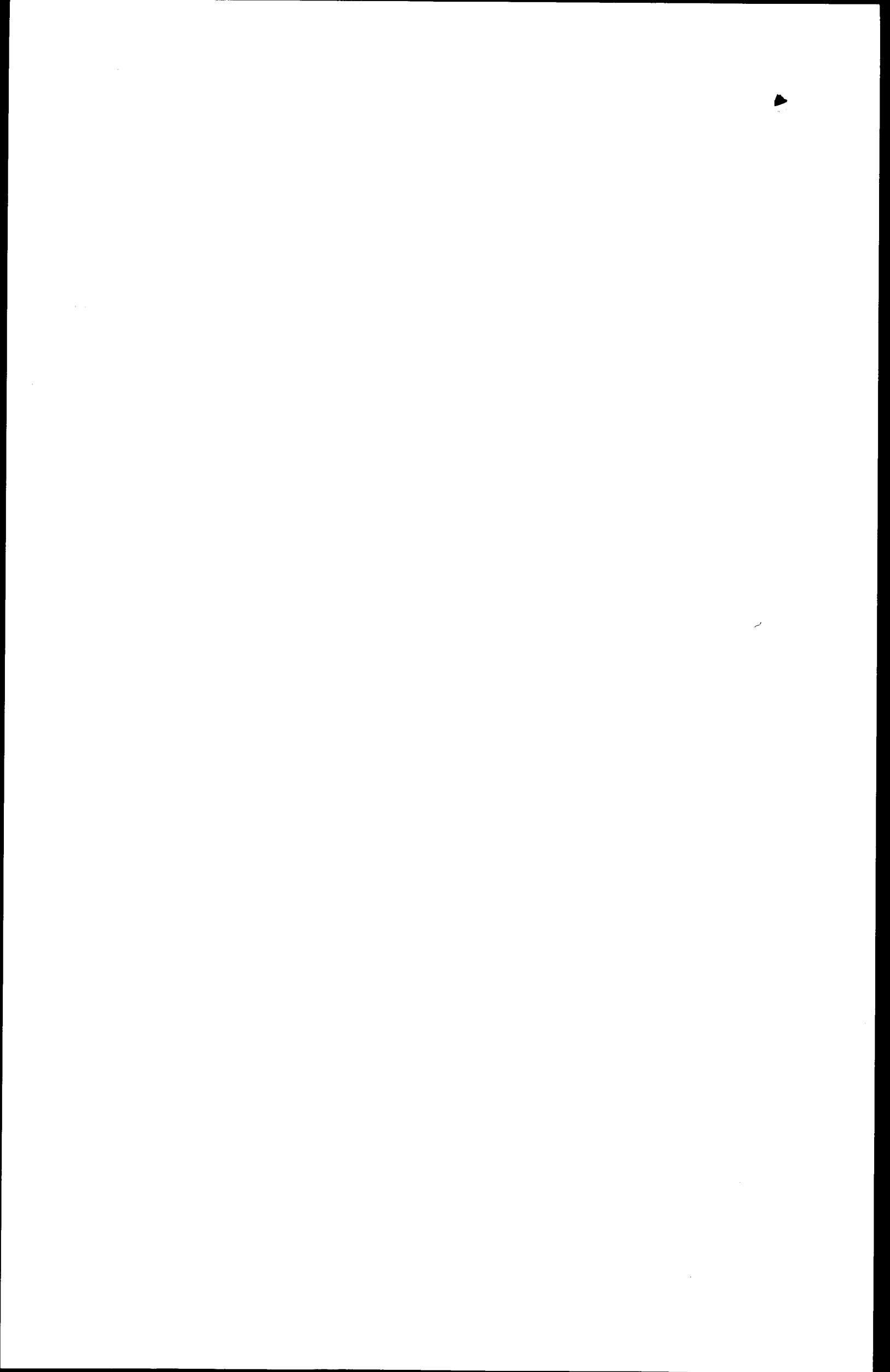


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5. That being aggrieved with the part of list of the constituencies published in the Preliminary Delimitation Report 2018, the Petitioner seeks the indulgence of this Hon`ble Commission for making amendments, alterations, and/or modifications as suggested/proposed by the Petitioner on the following grounds;

GROUNDS

- A. That it is respectfully submitted that the Preliminary Delimitation Report with regard to the PP-181 and PP-182 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-181 and PP-182, the Delimitation Committee has included, PC Mudkey Dhariwal of Kot Radha Kission-II QH in pp181 whereas previously the said PC has always been part of City Kot Radha Kission. Public convenience as well as physical features mandate Pc Mudkey Dhariwal to be part of PP-182 wherein the Kot Radha Kission city falls.
- D. That the city of Kot Radha Kission is the main line of communication of the People of PC Mudkey Dhari Wal. Thus in order to ensure homogeneity, it is imperative that the said PC is excluded from PP-181 and included in PP-182.
- E. That the PC of Zafar Ke on the other hand, have close proximity to allied PCs already Part of PP181 so and it will form a geographically compact area of PP-181.
- F. That the proposed additions, will balance the population of both the PP-181 and PP-182 constituencies and will be more convenient for the voters of the identified areas, to be part of the respective proposed constituencies.
- G. That it is respectfully submitted that it is a paramount principle of delimitation that the process must take into regard of the distribution of population in



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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 para 4 takes into account all these factors into account which have been omitted in the Preliminary Delimitation Report.

- H. 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



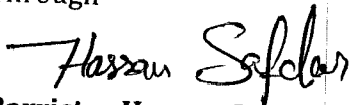
Rana gulraiz Sajjad

CNIC No. 35102-9866937-7

Resident of P.O Mudkey Dhariwal

Tehsil Tehsil Kot Radha Kissiom, District Kasur

Through



Barrister Hassan Safdar Khan
Advocate High Courts

