

/

MAGAN
3/4/18

SECRETARY ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

REPRESENTATION ON BEHALF OF SHAHID HUSSAIN S/O
MUHAMMAD HANIF, MOHALLAH ATIQ SHAHEED, STREET NO. 3
COT RADHA KISHAN, DISTRICT KASUR.

Respectfully Sheweth:

1. That the objector is a bonafide resident of Kot Radha Kishan, District Kasur, a voter in the proposed constituency PP- 182 (Kasur IX). 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. That the delimitation of the constituency PP-182 (Kasur-IX) has been proposed/suggested by district election officer Kasur. The proposed constituency is duly reflected from the map of the District Kasur.
 - *Copy of Map is attached herewith as Annexure-B.*
3. That the demarcation of the constituencies as proposed by the district election officer is offensive to the policy, rules and regulations of the Election Commission of Pakistan.



The proposed delimitation offends the provision of Election Act, 2017.

2
M. J. Khan
3/9/18

4. That the objector is aggrieved of the proposed delimitation which is highly offensive to the public convenience and no other object can be achieved through impugned proposed delimitation except to disfranchise the voters of the constituency. The proposed delimitation is illegal and unlawful and the same is liable to be set aside on the following among other:-

GROUND

- a) That the factum of compactness of the constituency has all together been ignored. The areas of PC Lakhneke, Theh Bhallo, Haveli Kafan Wara, Wadana and PC Khara etc have been included in PP-182 without considering that there is a considerable gap between main constituency 182 and the aforementioned parts of the constituency, the areas of PP-175 namely QH Kasur-I, PC Aurara, PC Athil Pur etc in PP-175 fall in between the two portions of PP-182.
- b) PP-182 is situated in the North of Kasur District right beneath district Lahore. Raja Jang and QH Raja Jang have been included in this constituency without considering that the said areas are directly connected and fall to PP-175 and having urban population can conveniently be made the part of PP-175. The proposed demarcation by the objector would reveal that whole of the Tehsil Kot Radha Kishan is included in PP-182 leaving only one part of Tehsi Kasur (Khudian QH) to be included in the proposed constituency. Such suggestions of the objector will be administratively most congenial.



- 3
MHC
24/11/18
- c) That the proposed suggestion of the objector will make all the three constituencies, PP-175, PP-176 and PP-182 predominantly falling in tehsil Kasur, will be compact, convenient, assessable and with appropriate population of each constituency.
- d) That the District Election Commissioner Kasur who conducted the physical survey of all the constituencies in Tehsil Kasur, proposed and recommended the demarcation of boundaries but ignored the fact the distances of the constituencies are disproportionate and the facility of transport as well as access to the polling stations will be impossible and inadequate which will cause unnecessary problems to the voters who will remain unfamiliar and will not be able to know where the polling stations are and to which constituency they belong to.
- e) That the constituency as proposed by the objector, is caused upon rational on which the task of constituencies is conducted keeping in view the necessary factors namely proportionate distribution of the constituencies, ensuring the public convenience, compactness of the constituencies, administrative units and the excess of the voters for selection of the candidate of their own choice. Following the above parameters the objector has proposed the proper reviewing the existing proposal.

- *Copy of the proposed demarcation of PP-182 by the objector is annexed as Annexure-C.*

PRAYER

In the aforementioned encapsulations it is therefore most respectfully prayed that the proposed demarcation of the constituencies as suggested in the preliminary report may



please be set aside and the fresh delimitation as requested herein above may please be directed in the larger interest of nation and of the population of inhabitants of district kasur.

4
MHA
3/1/18

It is further prayed that this Honorable Commission may be please make the demarcation and process of delimitation a fresh in the light of the proposal as set by the objector.

Any other relief which this Honorable Court deems appropriate may kindly be granted to the objector.

Shahid Hussain
Objector/Petitioner

Shahid Hussain S/o Muhammad Hanif
R/o Mohallah Atiq Shaheed
Street No. 3, Kot Radha Kishan, Kasur
0300-4460840

Through

Muhammad Mohsin Malik
MUHAMMAD MOHSIN MALIK
Advocate High Court

