

BEFORE THE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

31-05-2018
(1-3)
(7)

**MEMORANDUM AS REQUIRED UNDER RULE 12 OF
ELECTION RULES FORMULATED UNDER THE ELECTION
ACT 2017.**

Respectfully sheweth:

1. That the petitioner is a resident of Haveli Makhan Singh Bhamba Kalan Patwar Circle Bhamba Tehsil Kot Radha Kishan District Kasur having silsila No. 57, Gharana No. 25 NIC No. 35102-39649683 within the area of PP 182.
2. After the publication of the preliminary proposal of the Commission of delimitation formulated of the constituency 182 the provisions of section 20 of the Election Act 2017 are not kept as the guide line in formulation of PP 182 District Kasur. The total population as stated of the constituency 182 is 404120. The area of PC Khara having the population of 17072 and PC Laknayke having the population of 24028 are included in PP 182. It is mandatory principle of delimitation that the population must be in geographically compact area with the other area of the constituency. The existing boundaries of the administrative units, facilities and the communication and public convenience to ensure homogeneity in the creation of the constituency negate

the essential features. Similarly, the PC Atheelpur and PC Arora are within the proposed constituency PP 175 Kasur I. If we have a glance at the plan of District Kasur PC Arora is connected with the boundaries of PP 182. The area of PC Lakhaneke and PC Khara start after crossing PC Atheelpur and PC Arora. In this way PC Arora is an intervening area of the other areas of the constituency 182. and PC Lakhaneke and PC Khara. It has segregated the constituency PP 182 in two separate blocks. Thus the proposed constituency PP 182 is against the prism of law of delimitation.

3. That PC Khara comprising of the population of 17072 while PC Lakhaneke comprising on the population of 24028 total 41100. Similarly PC Arora is comprising the population of 13382. If PC Arora is excluded from PP 175 and PC Lakhaneke and PC Khara is included in PP 175 then the total population of PP 175 would be 403201 and the total population of PP 182 would be 376402. By this insertion the population of the constituency will not effect the scheme of law and scheme of the delimitation. If this alteration and modification is accepted then both the constituencies PP 182 and PP 175 would be in compact area and the homogeneity of the area would be kept in its totality. This modification does not effect on the proposed constituencies of whole of the District
4. The delimitation of the constituencies would be more effective, compact with each other there will be no isolation of the areas of compact scheme of both the constituencies if the objection is considered and allowed. The modification is justifiable to meet the ends of justice. The petitioner will suffer an irreparable loss

Amir
31-03-2016

and inconvenience if the proposed alteration and modification in both the constituencies are not allowed.

PRAYER.

It is humbly requested by accepting the instant representation the PC Arora of Tehsil Kasur may kindly be included in PP 182 by excluding from PP 175 Kasur. Similarly, PC Khara and PC Lakhaneke may kindly be included in PP 175 Kasur by excluding from PP 182 District Kasur.

Any other relief which this Hon'ble Commission deems fit may also be granted.

Petitioner

نو محمد

(Noor Muhammad) s/o
Ismail r/o Haveli Makhan Singh Bhamba
Kalan Tehsil Kot Radha Kishan District
Kasur.

Through

(Ch. Iftikhar Ahmad Khan)
Advocate High Court,

CNIC No. 35202-06200777 CC No. PKS 47990
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(Iftikhar Ahmad Khan Saldera)
Advocate High Court,

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(Inaam ul Haq Faiz Bhatti),
Advocate High Court,
Room No. 19 Saleemi Chambers

Hazrat Syed Miran Muhammad Shah Mojdarya Road,
Lahore.

Certificate.

Certified that this is the first petition filed on the subject.