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**BEFORE THE HON'BLE SECRETARY
ELECTION COMMISSION OF PAKISTAN
ISLAMABAD**

Mian Hamayon Dastgir son of Mian Ghulam Dastagir,
resident of House no 67-C Model Cooperative Housing
Society Okara.

Appellant

VERSUS

Delimitation Committee Punjab, PP-190 Okara VIII

Respondent

**REPRESENTATION/APPEAL UNDER SECTION 21
RULE 12 READ WITH ALL ENABLING PROVISIONS
OF THE ELECTION ACT, 2017 AGAINST THE
DELIMITATION BY THE RESPONDENT**

Respectfully Sheweth:

1. That correct addresses of the parties are incorporated in the caption of the instant appeal for service of process and issuance of any notice / summons by this Hon'ble Authority.
2. That the brief facts leading to filing of instant appeal are that the appellant is a registered voter of PP-190 Okara in Electoral Area / Census Block No. 193040905. Respondent has illegally and unlawfully excluded the Petitioner's PC 45GD of QH Akbar from

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included in PP-190 Okara-VIII and excluded from PP-184 Okara-II against the instructions issued for delimitation of constituencies of Provincial Assembly and National Assembly under The Election Act, 2017 and the rules made there-under. (Copies of voter certificate (Annex-A), Map issued by the ECP (Annex-B), Marked Highlighted Map issued by ECP, Proposed Marked Highlighted Map (Annex-C & C1) Population Description Chart Original and proposed of Constituencies PP-190 Okara-VIII & PP-184 Okara-II (Annex-D & D1), are attached herewith).

3. That the appellant prepared a proposed map and detail of equal distribution of population most appropriate then the respondent, compactness and public convenience of the adjacent constituencies' i.e. PP-190 Okara-VIII & PP-184 Okara-II as per law and rules. Copies of purposed Map and detail of population adjustment are attached as above.
4. That the impugned delimitation dated 05-02-2018 is illegal, unlawful and the same is liable to be set aside, inter alia, on the following:-

GROUNDS

- a) That the impugned delimitation is against the recognized principles of delimitation, including but not limited to the principles of equal distribution of population, geographical compactness, existing boundaries of administrative units, facility of communication and public convenience, and it is therefore,

- b) That the respondent has illegally, unlawfully excluded the Petitioner's PC 22GD of QH Akbar from PP-184 Okara-II and included into PP-190 Okara-VIII similarly the PC 45/GD of the same QH Akbar included in PP-184 Okara-II and excluded from PP-190 Okara-VIII against the instructions issued for delimitation of constituencies of Provincial Assembly and National Assembly under The Election Act, 2017 and the rules made there-under and has thereby caused permanent inconvenience and confusion for the residents of the PP-190 Okara-VIII.
- c) That above said proposed PC Chak no.022/GD of QH Akbar is connected with PP-184 Okara-II from three side and PC Chak no. 45/GD of same QH Akbar is connected with the PP-190 Okara-II from the boundary line and according to the 'Extent of Constituency' published by the respondent, these are not connected with the PP-190 Okara-VIII and PP-184 Okara-II respectively Therefore, it is more appropriate if the proposed delimitation is accepted in order to achieve the ends of geographical compactness and public convenience.
- d) That the impugned delimitation is a result of mala fide and political interference which has overlooked the principles of geographical compactness and public convenience, it is worth mentioning here the old map is also ignored and

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be excluded from PP-184 Okara-VIII and be included to the appropriate PP-190 Okara-VIII in the supreme interest of justice, equity and fair play.

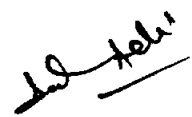
Any other relief which this Hon'ble Commission deems fit and appropriate under the circumstances may also be awarded to appellant.



Appellant

Through

Counsel



Hafiz Muhammad Saleem
Advocate High Court
7-Turner Road,
Lahore

Dated: _____