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

REPRESENTATION U/S 20 (2 & 3) OF THE ELECTION ACT, 2017 R/W RULE 12 OF THE ELECTION RULES, 2017 IN RESPECT OF PROPOSED CONSTITUENCY PP-203

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Objector

Through:

(Idrees Ashraf) Advocate

Cell: 0300-5287299

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Respectfully Sheweth:

- 1. That the Objector is registered voter of Constituency No. PP-203, who is aggrieved by the delimitation of this constituency proposed in preliminary report. In order to substantiate this fact his copy of ID Card and vote certificate are attached with this memorandum.
- 2. That it is the constitutional obligation of the Election Commission of Pakistan to ensure free and fair polls in the country. For achieving this objective fair and transparent delimitation is indispensable. Election Commission of Pakistan is duty bound to provide all voters of the constituency such an environment or process where they can exercise their right to vote in a free and convenient manner.
- 3. That the constituency PP-203 has been notified by the Election Commission of Pakistan, the proposed demarcation of the boundaries of electoral constituency PP-203 is faulty and may disenfranchise a great number of voter, therefore, liable to be amended / corrected and requires to be delimited as per proposal of the Objector, inter alia on the following:

GROUNDS:

That the areas of Patwar Circle (PC) Barey Wala, PC Hussain Abad Awal, PC Jalil Pur of Qanongoie Headquarter (QH) Bagarr have unjustifiably been included into PP-203, the said areas remained part of the adjoining constituency now proposed as PP-205, during the last three general elections, beside the same PC Jalil Pur has been delimited in a Tailor made manner as it has no geographical

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link with the rest of the areas of PP-203 rather the same is existing in the Island shape as the intervening area comprise of rest of the two PCs of Bagarr QH, which is against the fundamental principles of delimitation therefore the exclusion of afore said PCs Bagarr QH from PP-203 is in the interest of justice.

- ii) That PC Barey Wal, PC Hussain Abad and PC Jalil Pur of QH Bagarr have the compact boundaries with the area of PP-205 not PP-203 to which they have been attached. These areas never have been the part of Tehsil Kabirwala Constituency.
- That PC Chak # 1/KM, PC Chak # 6/DH, PC Chak # 9/DH, PC Chak # 16/DH, PC Daira Mahram, PC Kot Islam of QH Abdul Hakim which form part of NA-151 warrant to be included in PP-203 mainly on the ground that the natural boundary of "River Ravi" intervenes between the said PCs of QH Abdul Hakim and urban area of Municipal Committee Abdul Hakim and one has to cross the area of PP-203 to reach the above said PCs included in PP-205, the factor of the means of communications have not been addressed in this regard in the proposed PP-203. It is worth mentioning here that the above said PCs are compact and contiguous with the areas of PP-203, but not contiguous with areas of PP-205 therefore exclusion of the same from PP-205 and its inclusion in PP-203 is absolutely legal and justified in order to provide convenience for the general public.
- iv) That the population factor of the above said changes proposed by the Objector has fully been addressed in the enclosed table of population which demonstrate that in view of proposal of the Objector given in the preceding paras minimum and maximum standard of the population remains intact.

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Table of Population PP-203 Proposed by Election Commission of Pakistan, Islamabad

Proposed Population of PP-203 by ECP	356541
Exclusion of population as per public proposal PC	25206
Barey Wala, Hussain Abad, Jalil Pur of QH Bagarr.	F 10 20 20 20 20 20 20 20 20 20 20 20 20 20
Inclusion of population of PCs Chak # 1/KM, Chak #	35785
6/DH, Chak # 9/DH, Chak # 16/DH, Dara Mahram,	
Kot Islam of QH Abdul Hakim.	
Total population as per public proposal	367120

- That the proposal of the Objector from all angles adequately address the factor v) of population, geographical compactness, physical features, existing boundaries, facilities of communication. Public convenience and all ancillary cognate factors.
- That proposed map in view of the proposal of the Objector is being appended. vi)

In view of the above, it is therefore respectfully prayed that instant representation may kindly be accepted, constituency PP-203 may very kindly be delimited as per above mentioned proposal and corresponding changes / correction may also be made in constituency PP-205 and the earlier notification in this regard may kindly be set aside. Asin Zulbajadin
Asim Zulbajadin
S/O
Through: Allah Ditta.

(Idrees Ashraf) Advocate

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