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**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-204**

Respectfully Sheweth:

1. That the Objector is registered voter of Constituency No. PP-204, 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-204 has been notified by the Election Commission of Pakistan, the proposed demarcation of the boundaries of electoral constituency PP-204 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:

**GROUND:**

- i) That the areas of Patwar Circle (PC) Korey Wala, PC Kot Bahadar and 14/V of Qanongoie Headquarter (QH) Kabirwala-I have unjustifiably been included into PP-204, the said areas remained part of the adjoining constituency now proposed as PP-205, during the last three general elections held in the year 2002, 2008 and 2013. The said area is distantly situated from Jhang Kabirwala Road, which on

its both sides is the transport backbone of the constituency and is therefore is the longstanding identity of Provincial Assembly constituency of Tehsil Kabirwala. The geographical existence of the above said PCs in the map, also demonstrate that the said area is more contiguous with the area of PP-206 therefore exclusion of the above said area of PP-204 and its inclusion in PP-206 is fully justified.

- ii) That the exclusion of PC 5 Kassi of QH Kabirwala-II from PP-206 and its inclusion in PP-204, Is necessary as it had the longstanding existence with the area of PP-204. The said PC is situated on and accessible via the main Jhang Kabirwala Road thus its inclusion in PP-206 is without any lawful justification because it can only be reached by travelling by road through PP-204. Moreover the proposed arrangement is the source of odd shape and uneven boundaries of both constituency therefore to maintain the compactness and to address the convenience factor of general public, exclusion of PC 5 Kassi from PP-205 and its inclusion in PP-204 is the dire need of the area.
- iii) That the proposal of the Objector from all angles adequately address the factor of population, geographical compactness, physical features, existing boundaries, facilities of communication. Public convenience and all ancillary cognate factors.
- 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.

**Table of Population PP-204 Proposed by Election Commission of Pakistan, Islamabad**

Proposed Population of PP-204 by ECP	733535
Exclusion of population as per public proposal PCs Kot Bahadar, Korey Wala, 14/V QH Kabirwala-I.	16956
Inclusion of population of PC 5 Kassi of QH Kabirwala-II.	19209



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Total population of PP-204 as per public proposal	372788
Population of PP-206 as per ECP	384384
Population of PP-206 as per public proposal	385131

v) That proposed map in view of the proposal of the Objector is being appended.

In view of the above, it is therefore respectfully prayed that instant representation may kindly be accepted, constituency PP-204 may very kindly be delimited as per above mentioned proposal and corresponding changes / correction may also be made in constituency PP-206 and the earlier notification in this regard may kindly be set aside.

*Dr R. H. G.*  
Objector

*Anais Lehman Hayyat*  
S/O

Through:

*Mohamad Hayyat*

*Imran Ashraf*  
(Idrees Ashraf)

Advocate

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