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BEFORE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

Representation No. _____/18

REPRESENTATION UNDER SECTION 21 (3) OF ELECTION ACT 2017 READ
WITH SECTION 12 OF ELECTION RULES 2017 WITH ALL ENABLING
PROVISIONS AGAINST THE DELIMITATION BY THE RESPONDENT.

TARIQ MASOOD Son of Niamat Ali,
resident of Chak No. 27-M, Post Office Chak No. 35-M,
Tehsil Dunya Pur, District Lodhran.
Phone No. 0345-2967500 & 0323-5170880.
advkhalilawan@yahoo.com

May it please your Honour :-

The Petitioner submits following objections regarding revised constituencies falling in Provincial Assemblies of District Lodhran :-

1. That correct address of the parties is incorporated in the caption of the instant appeal for service of process and issuance of any notice / summons by this Honourable Authority.
2. That petitioner is a bonafide voter of Chak No. 28-M, Tehsil Dunya Pur, District Lodhran. Certificate of voter dated 21-03-2018 issued by District Election Commissioner Lodhran is annexed as Annexure-"A".
3. That the Election Commission of Pakistan has published Notification No. F-8(3)/2018-Elc-1 dated 05-03-2018 through official Gazette, for information of general

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public, preliminary report and the list of constituencies in respect of National Assembly and the Provincial Assemblies.

4. That petitioner got map from the office of respondent which is annexed as **Annexure "B"**.
5. That petitioner also annexed the proposed map with proposed constituencies is annexed as **Annexure "C"**.
6. That the list of constituencies PP-224-I to 228-V District Lodhran issued by Election Commission of Pakistan is annexed as **Annexure "D"**.
7. That proposed list of constituencies PP-224-I to 228-V District Lodhran after due amendments (inclusion & exclusion) in whole District Lodhran is annexed as **Annexure "E"**.
8. That the delimitation of 05 constituencies of the Provincial Assembly from District Lodhran-I to -V is not in consonance with the provisions of The Election Act, 2017. The delimitation officer has proceeded with the delimitation of the constituencies for the Provincial Assembly from Lodhran-V District in disregard of the provisions of law and cardinal principles of compactness, contiguity and equality of population.
9. That the petitioner being aggrieved raising objections and seeks amendment of delimitation of constituencies PP-224 to PP-228, District Lodhran I to V inter alia on the following:-

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- 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, including or excluding PCs & QHs according to the geographical boundaries, facility of communication and public convenience and even not according to the adjustment of constituency of National Assembly, it is therefore liable to be declared illegal, unlawful and against the law and rule applicable thereto.
- b. That petitioner in making these proposals after issuance of revised constituencies of Provincial Assembly District Lodhran-I to V, the petitioner has serious reservations on revised plan of provincial constituencies and submits objections /proposed amendments.
- c. That delimitation made by Honourable Election Commission was not feasible physically. The inclusion of 34/M and 28M PCs in PP-228 were seriously disturbing the geographical compactness of administrative units. These PCs are falling adjacent to PP-227, therefore these have been excluded from PP-228 and included in PP-227 for the compactness of administrative units and convenience of public
- d. That since the Election Commission has desired to adjust all related constituencies in the District, therefore this constituency has been adjusted keeping in view the limit of population and to facilitate the voters

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- e. The delimitation made by Honourable Election Commission was not feasible physically. The inclusion of 34/M and 28M PCs in PP-228 were seriously disturbing the geographical compactness of administrative units. These PCs are falling adjacent to PP-227, therefore these have been excluded from PP-228 and included in PP-227 for the compactness of administrative units and convenience of public. Since Rawani & Chanu Shahbaz already falls in the territorial jurisdiction of Tehsil Lodhran since long, therefore, the said PCs have been included in PP-226.
- f. That delimitations have not been made in accordance with the manner, provided by Rule 10(5) of the Election Rules 2017 according to which delimitation of constituencies of an Assembly shall start from Northern end of District and then proceed clockwise in a zigzag manner keeping in view population of the constituency.
- g. That proposed amendment is covered whole the District.
- h. That existing delimitation of constituencies of PP-224 to PP-228 have been made in clear violation of Rule 10 (5) of Election Rules 2017 which contemplates that delimitations shall start from Northern end of the District while the area of all the constituencies exists as previous, due to which population among the constituencies shall remain as closed as may be practicable.
- i. That since long the above said proposed QHs had been in one and same constituencies.
- j. That proportion of population of constituencies have not been kept into consideration while making the delimitation.

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k. That the plan of Lodhran-I to V constituencies of Provincial Assembly, objections / justifications and proposed amendments are tabulated as under:-

Constituency PP-224 Lodhran-I

Proposed amendment	Reasons / Justification of proposed Amendment	Proposed population.
Inclusion of PCs :- i. Burhan Pur ii. Hawali Naseer Khan iii. Khotha Utera Exclusion of PCs :- i. Chowki Sobha Khan ii. Rind Jada iii. Chowki Rango Khan iv. Muhammad Saae	Since the Election Commission has desired to adjust all related constituencies in the District, therefore this constituency has been adjusted keeping in view the limit of population and to facilitate the voters.	345440

Constituency PP-225 Lodhran-II

Proposed amendment	Reasons / Justification of proposed Amendment	Proposed population.
Inclusion of PCs :- i. Bhotiji (complete QHs) Exclusion of PCs :- i. Hawali Naseer Khan ii. Khotha Utera	Since the Election Commission has desired to adjust all related constituencies in the District, therefore this constituency has been adjusted keeping in view the limit of population and to facilitate the voters.	343169

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Constituency PP-226 Lodhran-III

Proposed amendment	Reasons / Justification of proposed Amendment	Proposed population.
Inclusion of PCs :- i. Rawani complete QHs	Since the Election Commission has desired to adjust all related constituencies in the District, therefore this constituency has been adjusted keeping in view the limit of population and to facilitate the voters.	335921

Constituency PP-227 Lodhran-IV

Proposed amendment	Reasons / Justification of proposed Amendment	Proposed population.
Inclusion of PCs of 34/M QH :- i. 34/M ii. 28/M	While delimitation, the Election Commission has included these PCs in the constituency of PP-228 which was absolutely not feasible as these PCs are falling far away from Dunya Pur which would have create great inconveniences for the voters. More over these PCs were falling in PP-227 since long. As these PCs are near / adjacent to Dunya Pur, therefore the same have been included in PP-227.	337123

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	Since Rawani & Chanu Shahbaz falls in the territorial jurisdiction of Tehsil Lodhran, Therefore, the said PCs have been included in PP-226.	
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Constituency PP-228 Lodhran-V

Proposed amendment	Reasons / Justification of proposed Amendment	Proposed population.
Inclusion of PCs :- i. Chwoki Sobha Khan ii. Rind Jada iii. Chowki Rango Khan iv. Muhammad Saae Exclusion of PCs :- i. 38/M ii. Fateh Pur iii. Kotli Wajwah iv. 1 to 4 /MPR v. 44/M vi.34/M v. 28/M	The delimitation made by Honourable Election Commission was not feasible physically. The inclusion of 34/M and 28M PCs in PP-228 were seriously disturbing the geographical compactness of administrative units. These PCs are falling adjacent to PP-227, therefore these have been excluded from PP-228 and included in PP-227 for the compactness of administrative units and convenience of public.	338967

PRAYER :-

In view of the above submissions, it is not respectfully prayed that instant representation / objection petition may graciously be accepted and impugned delimitation may kindly be set aside according to the proposed plan in the greater interest of justice.

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It is further prayed that proposed inclusion / exclusion Areas (QHs and PCs) in the Provincial Assembly Constituencies PP-224-I to PP-228-V of District Lodhran may be accepted in the best interest of justice, equity and fair play.

Any other relief which this Honourable Authority deems fit and appropriate under the circumstances may also be awarded to petitioner.

طابق مسعود

.....Petitioner

INTELLIGER LAW ASSOCIATES.

Chamber No. F-8, 1st Floor, Ghauri Block,
District Courts, Rawalpindi

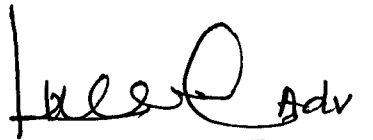
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K A Awan
A.A.W

KHALIL AHMAD AWAN.

Advocate High Court

*  Adv

KHALID MEHMOOD.

Advocate High Court

VERIFICATION :-

Verified on Oath at Islamabad on this 28th day of March 2018 that the contents of petition are true and correct to the best of my knowledge and belief.

طابق مسعود

.....Petitioner.