

Before the Honorable Election commission of Pakistan

Representation under Section 21(3) of the Elections Act 2017 read with Rule 12 of Election Rules 2017, regarding PP-32 (Gujrat-V), PP-33 (Gujrat-VI) and PP-34 (Gujrat-VII)

The petitioners, most humbly, submit as under:

1. That the petitioners are registered as voters in concerned constituencies and are entitled to file this representation.
2. That according to the Preliminary proposal for delimitation the constituency PP-32 (Gujrat-V) comprises the following areas:
 - a. Dinga MC
 - b. Dinga II QH of Kharian Tehsil excluding the following PCs:
 - i. Tapiala
 - ii. Waraichanwala
 - iii. Sikriali and
 - iv. Matuanwala
 - c. Dinga I QH of Kharian Tehsil
 - d. Jaura I QH of Kharian Tehsil excluding the following PCs
 - i. Bagrianwala
 - ii. Chakori Bhelowal and
 - iii. Dehkranwali
 - e. Jaura II QH of Kharian Tehsil
 - f. Lalamusa I QH of Kharian Tehsil excluding the following PCs
 - i. Chakori Sherghazi I
 - ii. Chakori Sherghazi II
 - iii. Kulewal Shahana

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- iv. Sadagol
 - v. Chokar Kalan and
 - vi. Khawaspur
 - g. MC Kharian
 - h. The following PCs of Kharian I QH
 - i. Dhunni
 - ii. Mohri
 - iii. Dhoria and
 - iv. Borianwali of Gujrat District

Total Population is 3,64,424

3. That according to the Preliminary proposal for delimitation the constituency PP-33 (Gujrat-VI) comprises the following areas:

- a. Lalamusa MC
- b. Kharian Cantt
- c. The following PCs of Lalamusa I QH
 - 1. Chakori Sher ghazi I
 - 2. Chakori Sher ghazi II
 - 3. Kulewal Shahana
 - 4. Saidagol
- d. Lalamusa II QH
- e. The following PCs of Kharian II QH
 - 1. Arah
 - 2. Bhagowal
 - 3. Doga
 - 4. Makwal
 - 5. Sainthal
 - 6. Sehna
- f. Kharian I QH excluding the following PCs of Kharian Tehsil

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1. Dhuni
 2. Mohri
 3. Dhoria
 4. Barianwala
- g. Bazurgwal PC of Sabour-I QH Kharian Tehsil and
- h. Sabour-II QH of Kharian Tehsil of District Gujrat.

Total Population is 3,91,770

4. That according to the preliminary proposal for delimitation, as published by the Election Commission of Pakistan, the constituency PP-34 (Gujrat-VII) comprises the following areas:

- a. Tehsil Sarai Alamgir
- b. Kotla Arab Ali Khan-I QH of Kharian Tehsil
- c. Kotla Arab Ali Khan-II QH of Kharian Tehsil
- d. Sabour-I QH excluding Bazurgwal PC
- e. Kharian-II QH excluding the following PCs
 1. Arah
 2. Bhagowal
 3. Doga
 4. Makwal
 5. Sainthal
 6. Sehna

Total Population is 4,33,794

Objections:

1. That PP-32 is not a geographically compact constituency as it does not consist upon contiguous areas as the PCs Matuanwala, Sikriali and Warraichanwala, which are part of PP-30 as per draft proposal for delimitation, bifurcate this constituency by disconnecting Tapiala, Chak Mehmood, Khoja, Topa Usman, and chimman from the main area of PP-32. That as per notification of the election commission the average population for a constituency of the provincial assembly is 3,70,429 and

5. That the constituency PP-34 is not in geographically compact form, rather it is very odd-shaped. A portion of this constituency has also intruded into PP-33 and thus virtually bifurcated this constituency.

6. That proposed constituency PP-33 having population of 3,91,770, has been delimited by unnecessarily breaching as many as five administrative units of Tehsil Kharian. The shape of PP-33 is just like an Comet and instead of proposing a geographically compact constituency the principle of cherry picking has been resorted to by taking portions of QH Kharian I, QH Kharian II, QH Sabour I, QH Sabour II, QH Lalamusa I and QH Lalamusa II, hence almost all the principles of delimitation has been grossly breached.

7. That while delimiting PP-33, two completely adjacent urban areas Kharian Cantonment and Municipal committee Kharian, which has virtually and for all practical purposes become one urban unit, have been made part of two different constituencies in violation of principles of delimitation. The map is also factually incorrect, as in this map Kharian Cantonment has been shown off the GT Road whereas the cantonment is situated right on the GT Road.

Suggestions:

That to rectify all the illegalities and irregularities mentioned supra and in order to delimit the constituencies completely in accordance with the principles of delimitations, the following suggestions are made:

PP-32 Gujrat - V

This constituency shall contain the following areas and population:

a. Municipal Committee Dinga of Tehsil Kharian	50802
b. Following PCs of QH Kharian I of Tehsil Kharian Mohri, Dhunni and Dhoria	35608
c. QH Dinga II of Tehsil Kharian excluding PCs Tapiala, Chak Mehmood and Chimman	60619
d. QH Dinga I of Tehsil Kharian	43628
e. QH Jaura II of Tehsil Kharian	56798

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f. QH Jaura I of Tehsil Kharian excluding PCs Bagrianwala, Dhakranwali, Chakorhi Behlowal and Mughli	44061
g. QH Lalamusa I of Tehsil Kharian excluding PCs Chokar Kalan, Khawaspur and Saidagol	55765
h. QH Lalamusa II of Tehsil Kharian excluding PCs Chak Miana, Hanj, Kamla Bhand and Panjan Kisana	54855

Total Population of PP-32 Gujrat V = 4, 02,136

PP-33 Gujrat - VI

This constituency shall contain the following areas and population:

a. QH Kotla Arab Ali Khan I of Tehsil Kharian excluding PCs Gotriala, Thotha Rai Bahadar and Manglia	32872
b. QH Kotla Arab Ali Khan II of Tehsil Kharian	57524
c. QH Sabour I of Tehsil Kharian	53684
d. QH Sabour II of Tehsil Kharian	42280
e. QH Kharian II of Tehsil Kharian excluding PCs Arah, Doga, Kalwal and Sainthal	47184
f. Following PCs of QH Kharian I of Tehsil Kharian Baghanwala, Baharwal and Jandanwala	33098
g. QH Lalamusa II of Tehsil Kharian excluding PCs Chak Sikander 30, Chak sikander 53, Jatria Kalan and Saida Braham	32468
h. PC Saidagol of QH Lalamusa I of Tehsil Kharian	5886
i. Municipal Committee Lalamusa of Tehsil Kharian	91542

Total Population of PP-33 Gujrat- VI = 3,96,538

PP-34 Gujrat - VII

This constituency shall contain the following areas and population:

a. Tehsil Sarai Alamgir	2,47,333
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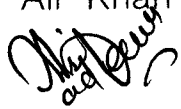
b. Following PCs of QH Kotla Arab Ali Khan I of Tehsil Kharian Gotriala, Thootha Rai Bahadr and Manglia	23268
c. Following PCs of QH Kharian II of Tehsil Kharian Doga, Kalwal, Sainthal and Aara	26405
d. Following PCs of QH Kharian I of Tehsil Kharian Marjan and Borianwali	12879
e. Municipal Committee Kharian	39301
f. Kharian Cantt	48118

Total Population of PP-34 Gujrat- VII = 3,97,304

This proposed constituency is geographically compact. Its total length is just 30 Kilometer. Instead of breach of five administrative units in impugned preliminary proposal for delimitation, the boundaries of only two administrative units have been breached. The population of this constituency is also within prescribed limit.

In view of above, it is hereby very humbly prayed that, by accepting this representation, the constituencies PP-32, PP-33 and PP-34 may kindly be delimited after incorporating the suggestions made by the petitioners.

Petitioners

1. Ch Shamshad Ali Advocate S/O Ch Rehmat Khan, R/O Chak Fazil Tehsil Kharian District Gujrat 
2. Muhammad Asif Nadeem Advocate S/O Naik Alam, R/O Kotla Arab Ali Khan Tehsil Kharian District Gujrat 
3. Ijaz Ahmad Tarar S/O Muhammad Sharif Tarar village Sadwal Kalan Tehsil Kharian District Gujrat.

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