

Memorandum/Representation by; RIAZ AHMED S/O MUHAMMAD ELAHI  
R/O BAHNO PINDI PO BOX JAMKEY CHEEMA, TEHSIL DASKA DISTRICT  
SIALKOT.

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TO,

**THE SECRETARY,**  
Election Commission of Pakistan  
G-5/2, Constitution Avenue,  
Islamabad.

**REPRESENTATION UNDER RULE 12 OF THE ELECTION RULES 2017 READ  
WITH SECTION 20 OF THE ELECTION ACT 2017 CHALLENGING THE  
PRELIMINARY PROPOSAL PERTAINING TO THE DELIMITATION OF  
PROVINCIAL ASSEMBLY CONSTITUENCIES PP-38 OF DISTRICT SIALKOT.**

Respected sir,

1. The instant Representation is being filed by Riaz Ahmad S/O  
Muhammad Jaffar R/O Bahno pindi PO Jamkey Cheema  
(hereinafter referred to as the "Applicant", voter member of  
proposed Provincial Assembly Constituency No. 39

- *Copy of the CNIC of the objector is attached as  
Annexure-A*

2. That the District Sialkot consists of four tehsils (Sialkot, Pasrur,  
Sambrial and Daska) with a population of 38,93,672 while the  
population of Tehsil Daska is 846,933. According to the census  
2017, there are two provincial assembly seats, as per the  
census 2017, in Tehsil Daska i-e PP-38 (Sialkot IV) with a  
population of 3,48,344 and PP-39 (Sialkot V) with population  
of 3,45,799. The comparison of the suggested/proposed

delimitation of the two constituencies of Daska Tehsil given in the following table:

PP-38 (Sialkot IV)	PP-39 (Sialkot V)
QH Daska-I	Daska-II
Municipal Committee Daska	Mirza Goraya & Jamke TC (old)
Patwar circles Jandoke, Kawanlit, Lahorike and Mondeke of QH Budha Goraya.	Gojra QH of Samrial Tehsil excluding following Patwar circles: Badoke and Kharolian.

- *Copy of the proposed/suggested plan of the constituency is attached as Annexure-B.*

3. That the perusal and examination of the above proposed delimitation of the above constituencies reflects that the proposed delimitation is faulty, unnatural and offensive to the basic concept of the delimitation. Such delimitation may disfranchise a great number of voters, for the following:-

- Both the constituencies are proposed in a manner that the concept of public convenience has been altogether ignored. The distance in PP-38 from one end to the other end is 45 KM while the distance in PP-39 is double to that of PP-38 i.e. 90 KM.
- The geographical compactness is lacking as QH Gojra and QH Mirza Goraya have been included in

PP-39 but these Quanogoi Halqas fall apart and are not adjoining each other.

iii. Mirza Goraya QH and TC Jamke (old) are at the boundary of MC Daska and viewing the road links, public convenience or the administrative units it is naturally a part of PP-38 but have wrongly been included in PP-39.

iv. The segregated areas are included in the constituencies that have made whole of the exercise of delimitation as contrary to the basic concept of delimitation

4. That keeping in view the basic concept of the delimitation, the equal distribution of population and fair division of geographical compact areas the constituencies can be proposed and finalized in a manner and population will will be divided equally as follow;

PP-38	PP-39
1. QH Mirza Goraya including TC Jamke (old)	1. QH Daska-1
2. MC Daska	2. QH Daska II
	3. Following Patwar circles of QH Budha Goraya: Jandoke, Kanwanlit, Mondeke and Lorikhi.
	4. QH Gojra Excluding:- PC Kharolian, Bdokey Malkhanwala and Bopalwala

	TC.
	5. Bego wala TC

5. That the District Election Commissioner Sialkot, who conducted the physical survey of all the constituencies in Tehsil Daska, proposed and recommended the demarcation of the boundaries but ignored the fact that the distances of the constituencies are disproportionate and the facility of transport as well as access to the polling stations will be impossible or inadequate which will cause unnecessary problems to the voters who will remain unfamiliar and will not be able to know where the polling stations are and to which constituency they belong to.

The areas allocated to the said constituencies are detached and urban areas are chalked without considering the public convenience or the access of the voters that will be detrimental to the rights of voters to cast their votes in haste atmosphere. in a manner that the arrangement shall cause problem to the voters. The proposed delimitation will be problematic for the people of Tehsil as facilities of communication are not available to that level.

- *Copy of the map of the constituencies showing the demarcation of district by objector is attached as Annexure-C.*

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*In the luminosity of aforementioned,* it is most respectfully prayed that the proposed demarcation of electoral constituency PP-38 is unjust, illegal and against the basic foundation of the principles of delimitation of the constituencies hence the same may please be set aside.

*It is further prayed that* this Honorable Commission may be please to make the demarcation and process of delimitation a fresh in the light of the proposal as set out in the paragraph 4 above.

*Any other relief* that this Honorable Commission deems fit and proper in the circumstances may also be granted in the interest of justice.

  
Objector/Petitioner

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Vote No: 164

Through



WAQAS KHALID CHEEMA  
Advocate High Court

M. MOHSIN MALIK  
Advocate High Court