

**BEFORE THE HONORABLE ELECTION COMMISSION OF**  
**PAKISTAN, ISLAMABAD.**

*In the matter of:*

**Delimitation of the constituencies of Provincial Assembly in**  
**Tehsil Daska District Sialkot, especially PP-39.**

**REPRESENTATION ON BEHALF OF ABDUR REHMAN**  
**S/O MUHAMMAD ELAHI, R/O VILLAGE**  
**SANDANWALLA, TEHSIL DASKA, DISTRICT SIALKOT**  
**IN RESPECT OF DELIMITATION OF THE**  
**CONSTITUENCY PP-39 (SIALKOT-V) PROPOSED IN**  
**THE PRELIMINARY REPORT.**

**May please your honor:**

*That the brief facts leading to the filing of the present representation are as under:*

1. That the Petitioner/objector, a registered voter of the constituency PP-39 (Sialkot V), seeks to file the present representation in the light of provisions of the Election Act, 2017. Previously, the present constituency was known as PP-130 (Sialkot X) and the Objector is aggrieved of the delimitation of the constituency proposed in the preliminary report.

- Copy of the CNIC of the objector is attached as Annexure-A
- Copy of the relevant page of the voters is attached as Annexure-A/1

2. That the District Sialkot consists of four tehsils (Sialkot, Pãsrur, 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:-

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## REASONS

- (a) 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.
- (b) The geographical compactness is lacking as QH Gojra and QH Mirza Goraya have been included in PP-39 but these Quanoqoi Halqas fall apart and are not adjoining each other.
- *Copy of the Map/plan of the constituency as proposed by objector is attached as Annexure-C.*
- (c) Daska I, Daska II, QH Budha Goaraya And PCs of Gojra form a compact unit, geographically contiguous and situated within the distance of less than 30 KM. Strangely the compact unit has been segregated and divided between two constituencies.
- (d) The QH Gojra has been included in PP-39 while QH Daska-I & II are directly linked with Gojra. Gojra on the other hand has no direct close link with the area falling in PP-39.
- (e) Mirza Goraya and TC Jamke (old) are at the boundary of Daska QH as well 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.
- *Copy of the Road links in the plan as proposed by objector is attached as Annexure-D.*

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(f) The demarcation lines of the proposed PP-39 & 40 have not been highlighted in the map correctly. TC Bhopalwala and TC Begowala are part of PP-40 but in the said map the said TCs are shown the part of PP-39. If the mapping is corrected then it will either disturb the proportion of the population or the respective areas of the constituencies.

- *Copy of the map of the constituency showing incorrect demarcation is attached as Annexure-E.*

(g) The proposed delimitation of the constituencies will divide the administrative units. The areas falling in limits of Bambanwala police station will be divided in two constituencies. PS 39 is spread over 5 police stations while PP-38 is spread over 3 police stations.

(h) 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.

(i) The delimitation in the year 1988 was completed without the influence of any political party and in the course of the process of the said delimitation the constituency was proposed and finalized in the manner as suggested by the objector. This fact alone establishes the fact that the relevant factors were taken into consideration and requisite parameters was followed at the relevant time for demarcation or delimitation of the boundaries of the constituency.



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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 the following manner:

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

5. That the above suggestions by the objector will cause the proportionate distribution of the population. PP-38 will have the population 361465 and PP 39 will have 338110 and PP-40 will have the population 338998. The constituencies will fall within the areas/limits of 3 to 4 police stations. The road links and element of public convenience will be better served and the constituencies will be in the shape of compact block.
6. 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



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unfamiliar and will not be able to know where the polling stations are and to which constituency they belong to.

- 7. 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.
- 8. That the urban areas of QH Daska-1, QH Daska-II and MC Daska are included in PP-38 but its adjoining areas are included in PP-39. The exclusion of the adjoining area and inclusion of distant area requires reconsideration of the suggested delimitation of the constituencies.
- 9. The maps of constituencies are attached with different colors to highlight the discrepancies and for logical delimitation with appropriate suggestions for appropriate changes to achieve the object of delimitation.

- *Copy of the map of the constituencies showing the demarcation of district is attached as Annexure-F.*

*In the luminosity of aforementioned, it is most respectfully prayed that the proposed demarcation of electoral constituency PP-39 is unjust, illegal and against the basic foundation of the principles of delimitation of the constituencies hence the same may please be set aside.*

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*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 IV above.

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


Objector/Petitioner



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District Sialkot. Contact No. 03204671986

Through

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