# BEFORE ELECTION COMMISSION OF PAKISTAN

# REPRESENTATION OBJECTION PETITION U/S 21 OF ELECTION ACT 2017AND RULE 12 OF THE ELECTION RULES 2017 RELATING TO PP-42- AND PP-43

## It is most respectfully submitted

- 1. That the petitioner is voter of PP-42 Sialkot VIII. Hence he is entitled to present this instant petition.
  - a) Copy of the ID Card extract from the electoral Roll is attached herewith.
  - b) That PP-42 Sialkot VIII comprise of the following QHs of Sialkot Tehsil:
  - i) Gunna Kalan
  - ii) Sialkot-1
  - of Sialkot District.
  - And it's total population is 3,69,101/-.
- 2. That the patwar circles of Gunnah Kalan of PP-42, unfortunately does not consist of those patwar circles which are contiguous to each other out of 21 patwar circles Two patwar circles Bhoth-I & Bhoth-II are not adjacent to remaining patwar circles. Due to this reason the principle of contiguous of area and compactness of block has been broken which is essential principle of delimination the area which is not contiguous with each other cannot fall within part of constituency.
- 3. That the population of Bhoth-I & Bhoth-II is as under;

at the hobaiation of more	
Bhoth-II Total	50,678/-
	10,486/-
	61,164/-

Which are adjacent to PP-43- and it's a geographically natural and inevetable/integral part PP-43 it cannot be included any other constituency, and map of district Sialkot issued by election commission of Pakistan which is showing the difference among PP-35 to PP-45 it self reveals that Bhoth-I patwar circle and Bhoth-II patwar circle are in PP-43 instead of PP-42. This is against the preliminary lis of delimitation issued by Election Commission. In order to make contiguity of constituencies this has been shown in the area where it's actuall fall.

4. That the disparity of population which comes due to inclusion of these two patwar circles in PP-43 then the remaining and adjacent population and patwar circles of PP-43 can be added with PP-42 and those patwar circles are as following;

a). Kundan Pur (PC)	=	7,892/-
b). Dalowali-I (PC)	=	14,174/-
c). Dalowali-II (PC)	=	8,222/-
•	=	9,748/-
d). Jhulki-l	=	18,204/-
e). Jhulki-ll	=	58,180/-
Totai		

5. That if patwar circles Bhoth-I & Bhoth-II be excluded from PP-42 and patwar circles Kundan Pur, Dalowali-I, Dalowali-II, Jhulki-I and Jhulki-II be included it's population will be as under;

# Excluding patwar's chart from PP-43

Kundan Pur	7,892/-	
Dalowali-I	14,174/-	<u>.</u>
Dalowali-II	8,222/-	
Jhulki-l	9,748/-	
Jhuiki-II	18,204/-	
	58,180/-	
Total	38,180/-	

### Including patwar's chart PP-42

Including	patwar 3 chart -
Bhoth-I	50678,/-
Bhoth-II	10,486/-
Total	61,164/-
TOTAL	CDD 42 and DD-43 will be

According to above mention Chart the population of PP-42 and PP-43 will be

#### as under;

00.42	PP-43
PP-42	3,49,750/-
3,66,117/-	3,49,730/

- 6. This is Pertinent to mention here that both PP constituencies above mentioned comes under the same national assembly constituency NA-76, it is therefore any change in both constituencies does not effect national assembly constituency.
- 7. That if the above mentioned suggestion are accepted than the violation of contiguity of area shall be ranctified and both the population will remain within the permissible limit of relaxation

[PP-42 will comprises of as following]

# [PP-42 Sialkot-VIII] (a) The following QHs of Sialkot

#### Tehsil;

- 1. Gunna kalan excluding the following patwars circles;
- a). Bhoth-I
- b). Bhoth-li
- 2. The following patwar circles of QHs Chaprar Khas;

- a). Kundan Pur
- b). Dalowali-I
- c). Dalowali-II
- d). Jhulki-l
- e). Jhulki-II
- 3. Sialkot-I

Of Sialkot District

Total 3,66,117/-

### [PP-43 Sialkot-IX] (a) The following QHs of Sialkot

Tehsil;

- 1. Chaprar Khas excluding following patwar circles;
- a). Kundan Pur
- b). Dalowali-l
- c). Dalowali-II
- d). Jhulki-l
- e). Jhulki-II
- 2. following patwars circles Gunna kalan;
- a). Bhoth-l
- b). Bhoth-II
- 3. Kotli Loharan excluding following PCs:
- 1). Hamun Gakhar No.1
- 2). Hamun Gakhar No.2
- 3). Jaster Wal
- 4). Marakewai No. 2
- 5). Muzzambad; and
- c). Kotli Loharan TC (old)
- 4. Phoklian of Sialkot District.

Total 3,49,750/-

### Prayer;

It is humbly requested that representation objection petition according to suggestions has given above may very kindly be accepted

Applicant:-

Qaiser Mehmood (2012) 0332-6107897

S/O Allah Rakha

R/O jamia Masjid Gulzar Madina, P.O Khas Bhoth, Tehsil

and District Sialkot

Through Counsel:-

2.CH.FARAZ ALI ADVOCATE

3.SYED ALI QASIM KAZMI ADVOCATE

District Court Sialkot.

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1.SYED IRTAZA HASSAN BUKHARI Advocate High Court
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