

BEFORE THE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

JA/31/03/2018
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MEMORANDUM AS REQUIRED UNDER RULE 12 OF
ELECTION RULES FORMULATED UNDER THE ELECTION
ACT 2017.

Respectfully sheweth:

1. That the petitioner is a resident of Kot Sher Singh Patwar Circle Chak No. 55 Tehsil Kot Radha Kishan District Kasur having silsila No. 267, Gharana No. 82 NIC No. 35102-8572931-9. Patwar Circle No. 55 is comprising on the villages chak No. 54, Chak No. 55 Kot Bashir Singh Chak No. 72 Qilla Bilaka Singh and Moinabad comprising on the population of 14430. PC 55 in the preliminary proposal of the delimitation published by the Commission is included in PP No. 181 of District Kasur. PC 55 is geographically compact area of Kot Radha Kishan 1 and 2 HQ along with the areas including in the Constituency PP 182 of District Kasur.
2. That the area of the villages comprising in PC 55 are inextricably ~~causally~~ connected with the Tehsil HQ Kot Radha Kishan. The facilities of the communication and public convenience naturally link with Kot Radha Kishan but the exclusion of PC 55 from the Constituency of PP 182 is against scheme of law as contained in section 20 of the Election Act 2017.
3. That the other areas of PP 182 are contiguous with PP 181 but under the sheer malice and political motivation against the homogeneity of that area excluded PC 55 from PP 182 of District

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Kasur. The other PC Kot Nasir Khan, Kot Radha Kishan Bohar comprising the population of 5844 are contiguous parts of PP 181. If these villages are excluded from the Constituency of PP 182 and included in PP 181 it will be a compact block and it will not vitiate the scheme of the delimitation of the constituencies. For the safe administration of justice and in compliance with the Election Commission Act 2017 PC Kot Nasir Khan be included in PP 181 while excluding PC 55 from PP 181 and be included in PP 182. The publication of the preliminary proposal of the constituencies PP 181 and PP 182 of District Kasur have caused irreparable loss and inconvenience to the petitioner and other inhabitants of the areas. The modification and alteration in the proposed PP 181 and 182 is justifiable to meet the ends of justice.

4. That this modification does not effect on the proposed constituencies of the whole of District. The petitioner has confined only to the extent of above mentioned alteration and modification.

PRAYER.

In view of the above, it is humbly requested that PC 55 of Tehsil Kot Radha Kishan may kindly be included in PP 182 District Kasur while excluding PC Kot Nasir Khan from PP 182 and included in PC 181 of District Kasur.

Any other relief which this Hon'ble Commission deems fit may

also be granted.

S. Faiz
Petitioner

31/03/2019

(Sardar Faiz Ilahi) s/o
Khan Bahadur Sardar
Muhammad Khan r/o Kot Sher
Singh Tehsil Kot Radha Kishan
District Kasur.

Through

(Ch. Iftikhar Ahmad Khan)
Advocate High Court,

CNIC No. 35202-0620077-7 CC No. PKS 47990
Cell No. 03009412852

(Iftikhar Ahmad Khan Saldera)
Advocate High Court,

CNIC No. 36601-1325750-3 CC NO. PVR 52649
Cell No. 03006990876

(Inaam ul Haq Faiz Bhatti),
Advocate High Court,
Room No. 19 Saleemi Chambers

Hazrat Syed Miran Muhammad Shah
Mojdarya Road, Lahore.

Certificate.

Certified that this is the first petition filed on the subject.

(Signature)
Advocate