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**BEFORE THE WORTHY ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD**

Ibtisam Shahid son of Shahid Mehmood, Caste Chahel, resident of Village Chappan Wali, Tehsil Safdar Abad, District Sheikhupura. CNIC No.35403-8297548-1, Mobile No.0333-4989609.

.....Petitioner

Versus

Election Commission of Pakistan, Islamabad.

....Respondent

**MEMORANDUM / OBJECTION PETITION AGAINST THE
PRELIMINARY DELIMITATION/DRAFT REGARDING
THE NATIONAL CONSTITUENCY NA-122 & NA-121
DISTRICT SHEIKHUPURA FOR EXCLUSION OF QH
AJNIAWALA FROM NA-121 AND TO BE INCLUDED IN
NA-122 AS WELL AS EXCLUSION OF QH BHIKHI FROM
NA-122 SHEIKHUPURA AND TO BE INCLUDED IN NA-
121 SHEIKHUPURA**

Respectfully Sheweth:

1. That the petitioner is resident of Village Chappan Wali, Tehsil Safdar Abad, District Sheikhupura and is enrolled voter to constituency number NA-122 Sheikhupura. Copies of CNIC and vote certificate are attached herewith as **Annex-A & A1**.
2. That the respondent/Election Commission of Pakistan has published its preliminary delimitation/draft regarding the constituency NA-121 & NA-122 District Sheikhupura.

3. That the preliminary delamination/draft regarding the national constituency of District Sheikhpura i.e. NA-121 & NA-122 Sheikhpura is against the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017.
4. That the Election Commission of Pakistan has published preliminary draft/delimitation regarding the constituency NA-121 & NA-122 district Sheikhpura. Copy of public notice is attached herewith as **Annex-B**.
5. That Election Commission of Pakistan has issued a preliminary draft/delimitation against law, facts, rules, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017.
6. That the preliminary draft/delimitation of constituency NA-121 & NA-122 district Sheikhpura is liable to be rectified, modified and revised under the following grounds:

GROUND:

- a. That district Sheikhpura consist upon 3,460,426/-. Copy of map is attached herewith as **Annex-C**.

- b. That the preliminary delimitation/draft regarding the national constituencies of Sheikhpura is against the spirit of law, rules, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017.
- c. That in the preliminary delimitation/draft QH Ajniawala has been included in NA-121 Sheikhpura against the law, rules, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017, whereas QH Bhikhi has been included in NA-122 Sheikhpura against the law, rules, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017.
- d. That keeping in view the golden principles, rules provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017, QH Ajniawala is liable to be excluded from NA-121 Sheikhpura and to be included in NA-122 Sheikhpura as well as QH Bhikhi is liable to be excluded from NA-122 Sheikhpura and to be included in NA-121 Sheikhpura.
- e. That the above mentioned exclusion as well as inclusion of both the QHs is in accordance with the rules, law, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017, keeping in view the

boundaries, sources of communication as well as public interest on the following grounds:

GROUND:

- f. That QH Ajniawala is situated at a distance of 50 Kilometers from Sheikhupura City as well as district head quarter, whereas QH Bhikhi is situated at a distance of only 10 Kilometers from Sheikhupura City as well as district head quarter.
- g. That the population of QH Ajniawala is 79,053/- and the population of QH Bhikhi is 137,260/-, so in case of exchange of both the areas as well as population from one constituency to another constituency, the parity of population remains very ideal and within the ambit of prescribed law, rules, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017.
- h. That the compactness of areas, existing boundaries, common sources of communication and the public convenience to the extent of QH Bhikhi is close and nearest to the Municipal Committee City and District Head Quarter Sheikhupura, whereas Ajniawala is not affiliated in all respective of compactness of areas, existing boundaries, common sources of communication and the public convenience, which is most feasible and

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comfortable with the inclusion in NA-122 Sheikhupura.

- i. That the result of delimitation is contrary deviation and negation of fundamental rights. The proposed map along with proposed population can be perused.

PROPOSAL:

- i. That the area as well as population of QHs Bhikhi be excluded from NA-122 Sheikhupura and be included in NA-121 Sheikhupura as well as the area and population of QHs Ajniawala be excluded from NA-121 Sheikhupura and be included in NA-122 Sheikhupura.
- ii. That the proposal of the petitioner regarding the delimitation of Sheikhupura into two national constituencies is within the ambit of golden principles, rules, provisions and sections laid down in the Delimitation Rules and Act, 2017.
- iii. That the proposed population for both the constituencies i.e. NA-121 and NA-122 is as under:

NA-121 Sheikhupura

Total Population	919,756
Exclusion Ajniawala	<u>-79,053</u>
	840,703
Inclusion Bhikhi	<u>+137,260</u>
	977,963

NA-122 Sheikhupura


Total Population	812,536
Exclusion Bhikhi	<u>-137,260</u>
	675,276
Inclusion Ajniawala	<u>+ 79,053</u>
	754,329

PRAYER:

In the circumstances mentioned above, it is humbly prayed that by accepting this memorandum/objection petition, the area as well as population of QHs Bhikhi be excluded from NA-122 Sheikhupura and may kindly be included in NA-121 Sheikhupura as well as the area and population of QHs Ajniawala may kindly be excluded from NA-121 Sheikhupura and may kindly be included in NA-122 Sheikhupura, in the interest of public and justice.

Petitioner
Ibtisam Shahid

Through


Khurshid Ahmed Khan Chandia
Advocate High Court
0300-6718153

Imdad Ali Nekokara
Advocate High Court
0322-5111167
72 Mall Road, Lahore.