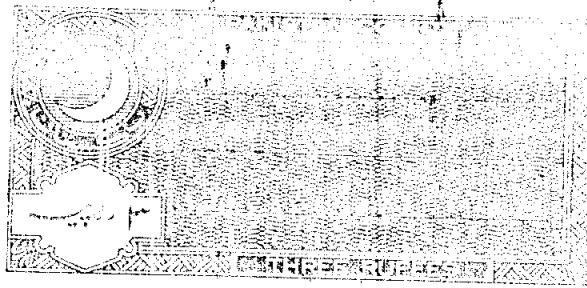


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**BEFORE THE SECRETARY, ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.**



Objection/Representation No. _____/2018

IFTIKHAR SHAHID Advocate son of Siraj Din r/o 114/1. Muslim Park,
Allama Iqbal road, Garhi Shahu, Lahore.

PETITIONER

Vs.

Delimitation committee of Constituencies, election commission of Pakistan,
Islamabad.

RESPONDENT

**OBJECTION/ REPRESENTATION PETITION REGARDING DELIMITATION IN
THE PROPOSED N.A.124, N.A.127, N.A.129, P.P.147, P.P.154, P.P.157
LAHORE.**

Respectfully Sheweth:-

1. That the petitioner being registered voter at Serial No.26, Block code No.186210104, in the area of Fazal Street, Garhi Shahu, Lahore. U.C.124 contested general election and By-Election in the previous constituency P.P.147(N.A.122) Lahore as candidate of P.P.P.P. held in 2013 and 2015 respectively.
2. That now the respondent has proposed afresh delimitation of Lahore and particularly N.A.124, N.A.127, N.A.129, P.P.147, P.P.154 & P.P.157 whereby the previous P.P.147 and N.A.122 have been distributed in to different pieces in different constituencies.
3. That the petitioner seeks correction and proper delimitations of the constituencies in accordance with the law on the following amongst other

GROUND S

- a. That the proposals for delimitation of constituencies in Lahore are not sustainable in any manner whatsoever as the respondent delimitation committee travelled beyond the prescribed procedure and principles as laid down in Section 20 of the Election Act 2017, Election Rules and the Constitution.
- b. That the respondent/delimitation committee has ignored during the course of delimitation the factor of distribution of population in geographically compact areas, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of the constituencies.
- c. That the area of Ghari Shahu Lahore consisting of three union councils No.119, 124, 173 was never bifurcated and divided in the past but now the area of Garhi Shahu has been bifurcated,

- h v
- distributed & broken in many pieces even the census circles and block code falling in U.C.124 have been broken in gross contravention of law and settled principles regarding delimitation.
- d. That the Patwar Circle is the basic unit under the law but the respondent delimitation committee has also broken the said basic unit of the area of Garhi Shahu and other relating areas.
 - e. That particularly areas Barni road Garhi Shahu, Barni Road Feroz Street, Badar Street, Police Station Garhi Shahu, Baber Street, Umar Street No.30, 31, 32, 33, New abadi Garhi Shahu Street No.38 & 40, Servay colony, Larechs Colony Street No.1,2,3, Barni road Garhi Shahu, Tariq Road behind P.S. Garhi Shahu, Masjid Tajdin, Larechs Colony, Nishter Park, Larechs colony, Level crossing, and Canal Bank, Baja Line have been shown and proposed in N.A. 127 & P.P.154 whereas the same areas Nai Abadi Garhi Shahu Street No.38 & 40, Badar Street, Fazal Street, Larechs Colony Street No.3 & 4, Fazal Street, Jhugian Yaseen, Tajamal Park, Sarvey Colony, Larechs colony Street No.1,2,3, Street No.43, Meeran Baksh Imam din, Ahmadi Ibadat Gah, Main allama Iqbal road, Badar Street, Fazal Street, Larechs Colony, Fazal Street Jugian Yaseen, Tajamal Park, Sarvey Colony, Larechs colony Street No.1,2,3, Baber Steer, Umar Street No.30,31,32,33, Masjid Taj din, Larechs Colony, Nishter Park, Level crossing, Canal Bank, Baja Line, have been also shown and proposed in the constituencies N.A.129 and P.P.157 which has created uncertainty, ambiguity and suspicion regarding the fair and impartial election and in case the same are not corrected in accordance with law keeping in view the boundaries of administrative and revenue units in the districts as well as prominent geographical and physical features having regard to the distribution of population in geographically compact areas, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of the constituencies. The record reveals that the respondent has not taken into consideration the wrong and illegal adjustment of the aforesaid areas in different constituencies mentioned above which is not warranted by the law.
 - f. That the respondent delimitation committee has damaged the geographically compact of the areas of Garhi Shahu Lahore and Railways Colony and its homogeneity which would cause public inconvenience and lack of facilities of communication.
 - g. That the area of U.C. 119, Railway Colony / Garhi Shahu Lahore has been wrongly included in N.A.124 and P.P.147 and the area of U.C. 118 Railway Signal shop has been also wrongly included in N.A.124 & P.P.147. As a matter of fact, the respondent delimitation committee has also damaged the geographically compact of Railway colonies as damaged the geographical compact in Garhi shahu Lahore.
 - h. That as a matter of fact the areas of Railways colony never remained separate from the area of Garhi Shahu Lahore keeping in view the administrative and revenue units.
 - i. That it is very essential to combine and unite the all areas of Garhi Shahu and Railway colonies in one constituency either in the proposed N.A.127, P.P.154 or N.A.129, P.P.157 and in case the same is not finalized, it would cause irreparable loss to the democracy and local public.
 - j. That the respondent has not given cogent reason and lawful justification regarding the said proposed constituencies and proposed the said delimitations arbitrarily, fancifully, mechanically, perversely and illegally. The said proposals for delimitations made by the respondents are liable to be set aside and reviewed

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In view the above it is therefore most humbly prayed that proposed delimitation regarding N.A.124, P.P.147, N.A.127, P.P.154, N.A.129, P.P.157 may kindly be ordered to be reviewed and the all areas of Garhi Shahu Lahore along with Railway Colonies included in the previous N.A.122 and P.P.147 may kindly be ordered to be declared in one proposed constituency either in N.A.127, P.P.154 or N.A.129, P.P.157 Lahore in the supreme interest of democracy and local public.

Fiaz Shahid

PETITIONER

Through

Jamal

JAMAL ASHRAF

Advocate

Syed Shamsar Shamsi

SYED SHAHSAWAR SHAMSI.

Advocate