

To,

The Secretary,
Election Commission of Pakistan,
Office at G-5/2,
Constitutional Avenue Islamabad.

**MEMORANDUM OF OBJECTION/REPRESENTATION
PETITION UNDER SECTION 21 (3) OF ELECTION
ACT, 2017 READ WITH RULE 12 OF THE ELECTION
RULES 2017 AGASINT PRELIMINARY DELIMITATION
OF NATIONAL CONSTITUENCY NO.NA-135 LAHORE-
XIII BY MALIK KARAMAT ALI SON OF SHAH
MUHAMMAD, RESIDENT OF HOUSE NO.224-R-II,
MOHALLAH JOHAR TOWN, LAHORE CNIC NO.35202-
0227777-3.**

Sir, it is humbly submitted as under:

1. That the objection/petitioner having CNIC No.35202-0227777-3 (**Annexure-A**) is permanent resident of House No.224-R-II, Mohallah Johar Town, Lahore, is register voter of N.A 135-Lahore-XIII under Censes Block No.185010761, Serial No.30, Constituency Area Society PIA Niaz Baig, Lahore (**Annexure-B**).
2. That previous this constituency was N.A-128 Lahore-XI (**Annexure-C**). Presently the preliminary after delimitation the new constituency is NA-135-Lahore-XIII (**Annexure-D**).
3. That now as per public notification issued by Election Commission of Pakistan under Section 21 of Elections Act, 2017 and Rule 11 of Election Rules 2017 draft list of preliminary delimitation NA

constituencies as well as Provincial constituencies are made. It is submitted that whole constituency has been disturbed and changed without any justification against the law and rules.

4. That the National Assembly presently Constituency No.135-Lahore-XIII is one of the most effected Constituency, wherein new limitation is drafted, which has severely disrupted the local areas and population of the Constituency by including the area of UC Awan Town, Kharak. It is pertinent to mention here that the said included area is part and parcel of the NA-126, Circle 2&3 of Charge No.55, total population is 26000, which is without any justification, missing in the serial Number and area etc. of National Assembly of NA-126 and included in the N.A-135 by violating the principles of delimitations under the Election Act, 2017.
5. That the total population of the Constituency No.135-Lahore-XIII is 815,592 if the above said area excluded from the Constituency No.135-Lahore-XIII the remaining total population is 789,592 which is according to the criteria prescribed by Election Commission of Pakistan. It is pertinent to mention here that after the alleged proposed inclusion of Circle 2&3 of Charge No.55 of NA-135 UC-Awan

Town & Kharak, total population is 26000 in the N.A-126, the total population of NA-126 Lahore becomes 831070 which is according to criteria prescribed by Election Commission of Pakistan.

6. That due to the new draft of limitation, the areas connected Constituency have deliberately been included from the old area the Constituency No.135-Lahore-XIII illegally, unlawfully and without any reason.
7. That the new draft of delimitation has been done by the committee beyond actual and physical existence at Constituency No.135-Lahore-XIII and against the basic principles of convenience for the local residents. It is penitent to mention here that the inclusion of said area i.e. Kharak & Awan Town UC is unnatural alliance in the said Constituency No.135-Lahore-XIII.
8. That the petitioner is one of the aggrieved people from the old Constituency and new draft delimitation and has legal right to file the objections/representations under the law for excluding the said areas.
9. That under the preliminary delimitation is not correct for geographically compact area and is against the law and against the principles of delimitation given in Section 20 of the Election Act, 2017 and Rules by ignoring the physical features, existing convenience, unnatural alliance and other cognate factors to ensure the homogeneity in the creation of Constituencies, hence Awan Town UC &

Kharam it is to be excluded from said constituency.
Map attached as Annexure-E. And Map as
ANNEX - F

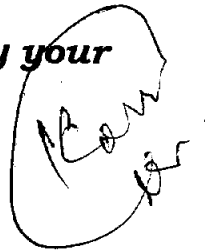
PRAYER

In view of the submissions made above, it is respectfully prayed that while accepting this objection petition/representation, the impugned draft of preliminary delimitation for Constituency No.135-Lahore-XIII may please not confirmed and after excluding Awan Town UC & Kharak the same may very kindly be confirmed.

It is further prayed that the proposed excluded area i.e. Circle 2&3 of Charge No.55 of NA-135 UC-Awan Town & Kharak, total population is 26000 may kindly be included in the Constituency No.126-Lahore-XIII.

Any other relief to which the petitioner is found entitled may also be awarded.

Sincerely your

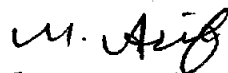


**MALIK KARAMAT ALI SON OF
SHAH MUHAMMAD, RESIDENT OF
HOUSE NO.224-R-II, MOHALLAH
JOHAR TOWN, LAHORE CNIC
NO.35202-0227777-3**



Through

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