

To,

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

**MEMORANDUM OF OBJECTIONS/REPRESENTATION
PETITION UNDER SECTION 21 (3) OF ELECTION
ACT, 2017 READ WITH RULE 12 OF THE ELECTION
RULES 2017 AGAINST THE PRELIMINARY
DELIMITATION OF NATIONAL CONSTITUENCY
NO.NA-136 LAHORE-XIV BY SALEEM AKHTER SON
OF MUHAMMAD AMIN, RESIDENT OF CHAH
SUBAYDARAN JANJATY POST OFFICE JIA BAGGA,
TEHSIL CITY LAHORE.**

Sir, it is humbly submitted as under:

1. That the objection/petitioner having CNIC No.35202-5515866-9 (**Annexure-A**) is permanent resident of chah Subaydaran Janjatay Post office Jia Bagga, Tehsil City Lahore, is register voter of N.A 136-Lahore-XIV under Censes Block No.261040302, Serial No.346, Constituency Area Dera Janjatay, 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-136-Lahore-XIV (**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 'lift 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 total population of the Constituency NA-136-Lahore-XIV is 794,917, and total population of NA-135 Lahore is 815,592 and the total population of NA-134 Lahore is 804,774. It is pertinent to mention here that there is undue difference of population and unnatural alliance by violating the principles of delimitation.
5. That the National Assembly presently Constituency NA-136-Lahore-XIV 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

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area of Tehsil Raiwind, Circle No.1&3 of Charge No.4, the population of Circle No.1&3 of charge No.1 is 81500 which is liable to be excluded from the said constituency and after exclusion the population NA-136 becomes 713417 the same is liable to included NA-135 Lahore, after inclusion of same the population becomes 803558. It is pertinent to mention here that the said included area is part and parcel of the NA-134, which is without any justification, missing in the serial Number and area etc. of National Assembly of NA-134 and included in the N.A-136 by violating the principles of delimitations under the Election Act, 2017. It is pertinent to mention here that circle No.1 charge No.1, Tehsil Model Town, District Lahore consists of population 93,534 having NA-135 which is liable to be excluded according to delimitation principles and same is liable to be included in NA-134 & NA-135 and after inclusion of it population becomes 898308 (NA-134), after exclusion the population of NA-135 becomes 722058.

6. That after the above said proposed amendments in NA-134 the population becomes 898308, it is further added here that Circle No.1,2,3&6 of Charge No.3 Tehsil Model Town, Lahore having population 37920 is to be excluded from constituency No.NA-134 Lahore, the total population becomes 860388. It is pertinent to mention here that after the above said proposed exclusion which is 37920 in the constituency No.134 same is to added in NA-136, Lahore. The total population NA-136 becomes 751333. After the above said proposed amendment, modification and alteration there would be no overlapping and geographical compactness in the proposed preliminary delimitation mentioned above.
7. That due to the new draft of limitation, the areas connected Constituency have deliberately been included and excluded in the Constituency NA-136-Lahore-XIV illegally, unlawfully and without any reason.
8. That the overlapping and new draft of delimitation has been done by the committee beyond actual and physical existence at Constituency NA-136-Lahore-XIV and against the basic principles of convenience for the local residents.
9. 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.
10. That under the preliminary delimitation is not correct for geographically compact area and is against the law

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and against the principles of delimitation and 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. Map attached as Annexure-E. AND Marked 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 NA-136-Lahore-XIV may please not confirmed.

It is further prayed that after inclusion and exclusion in body of petition mentioned in Para No.4 to 6 may kindly be ordered to be confirmed the delimitation of constituency N.A-136-XIV, Lahore.

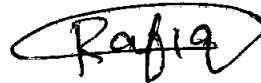
Any other relief to which the petitioner is found entitled may also be awarded.

Sincerely your



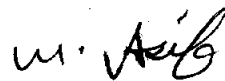
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CNIC No.35202-5515866-9



Through

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