



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

28/03/2018
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Petition No. _____/2018

RANA MUHAMMAD AFNAN KHAN son of Rana Ikhlq Ahmad Khan, resident of Qilla Noorpur, UC-59 Haft Mother Post Office Colony Shaukatbad, Tehsil and District Nankana Sahib.

PETITIONER

OBJECTION PETITION FOR AMENDMENT, ALTERATION AND MODIFICATION IN THE CONSTITUENCY NA-117, NA-118, PP-131, PP-132, PP-133 AND PP-134 NANKANA SAHIB, PUNJAB, UNDER SECTION 22 OF THE ELECTION ACT, 2017 READ WITH ALL OTHER ENABLING PROVISIONS OF LAW.

Respectfully Sheweth:-

1. That the present petitioner is the Voter Member of UC-59 Haft Mother District Nankana fell within the constituency of NA-118, and PP-134 and the Shumariati Block Code 201040701, Silsala No.428 and CNIC No.35402-9977946-7. Copy of the voter list is attached herewith as **ANNEXURE-A**.

ATTESTED

MUHAMMAD ARIF
Advocate High Court
Oath Commission
Lahore High Court Lahore.

26-03-2018



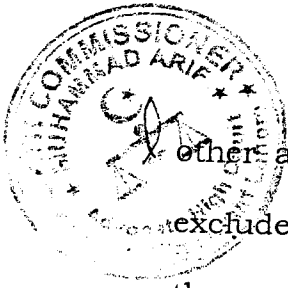
That according to new delimitation the total population of District Nankana Sahib is 1356376 and total population of NA-117 is 682338 and NA-118 is 674036 similarly the total population of PP-131 is 337304, PP-132 is 345034, PP-133 is 335513 and PP-134 is 338523. It is pertinent to mention here that due to the delimitation, the present petitioner has serious and solid objections regarding the same because the petitioner is going to contest the upcoming general election for the seat of NA-118. That according to the new delimitation the compactness is disturb because according to map the malafide of the authority came to surface because there was so much convenience available to the authority while working for delimitation of district Nankana to include QH Nankana-I (95790) in NA-117 and for distribution of equal population some patwar circles of QH Nankana to may also be included in NA-117 and after aforesaid inclusion in NA-117 the constituency of NA-118 will be more compactable as well as NA-117. In the presence situation the HQ War Burton has no direct access through metaled road are by way of railway line with the other area of NA-117 only one patwar circle have the bridge to interconnect HQ War Burton with the

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MUHAMMAD ARIF
Advocate High Court
Oath Commissioner
Lahore High Court, Lahore.

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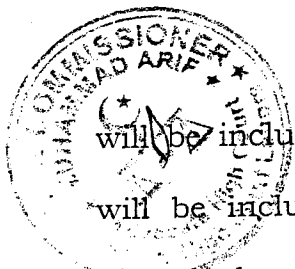
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other area of NA-117. Now on the other hand if we exclude War Burton (total population is 60298) and three union council Shareen Junger (total population is 12146), Fata Thata (total population is 8089) and Macharala (total population is) from NA-117 and include Nankana-I in NA-117 then the geographical compactness and physical public convenience will prevail. Moreover the easy approach to complete constituency will be prevailed. Copy of Map is attached herewith as ANNEXURE-B

3. That according to the map some portion of Nankana-I is in NA-117 and rest of the portion of Nankana-I is in NA-118, so keeping in view the future disturbance and difficulties it is suitable that Nankana-I, as afore stated, may be included in NA-117 and War Burton, as stated above, may be included in NA-118. If it will be done then there would be no effect on distribution of population in the aforesaid constituency.
4. That now if the aforesaid alteration and modification will be done then according to the new constituencies of PP-131, PP-132, PP-133 and PP-134 the map will be as the PP-131 will not be disturbed at all whereas in PP-132 after exclusion of War Burton the Nankana-I

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MUHAMMAD ARIF
Advocate High Court
Dist. Court
Lahore High Court
26-03-2018



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will be included in PP-132 and similarly War Burton will be included in PP-133 and PP-134 will not be disturbed and thereafter when we have a bird eye view on the map then the geographical compactness will be seen on the map. So for proper representation of people the aforesaid proposal is very suitable and the same may be done.

5. That according to map, on face of it, it could be visualized with naked eye that delimitation is a result of political victimization and the ruling party influenced the same.

6. That according to the narration of constituencies available on record of Election Commission of Pakistan (population and household detail from block to district level) Barkhudar and Badhe are fallen in Nankana Sahib-II (PP-133) but the map issued by the office of election commission of Pakistan was wrongly marked and it was shown on map that Barkhudar and Badhe is not included in PP-133 rather in PP-134, so the map has to be corrected.

7. That the present petitioner is residing in the local limit of District Nankana Sahib and has badly affected from the new delimitation and due to the aforesaid facts

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MUHAMMAD ARIFF
Advocate
Oath Commission
Lahore High Court Lahore

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seeks amendment alteration and modification of the constituency on the following amongst others:-

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GROUND

- a. That while acting under Election Act, 2017 the delimitation badly disturbed the constituency NA-117 and NA-118 because with regard to the distribution of population the geographical compactness was not followed and even did not bother to observe.
- b. That it is pertinent to mention here that according to map almost total urban area of Nankana-I and Nankana-II included in NA-118 and all the rural and Tehsil areas included in NA-117 and the same is not geographically compact.
- c. That the authorities ignored the principle of delimitation while distribution the population in relevant constituencies, ignored the geographical compact areas, physical features, existing boundaries of existing administrative units, facilities of communication and also public convenience.
- d. That the map of PP-133 and PP-134 is liable to be corrected.

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MUHAMMAD ARAF
Advocate
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e. That according to new constituency the public convenience is not available to the present petitioner.

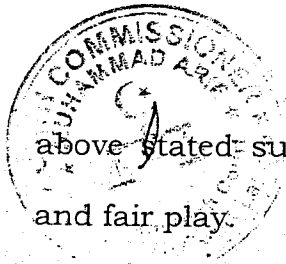
- f. That due to new delimitation the existing boundaries of administrative units have been disturbed.
- g. That due to new delimitation, the public convenience is disturbed.
- h. That there are so many other cognate factors which disturbed the homogeneity and geographical compactness of the area. So the constituency NA-117 & NA-118 are liable to be amended, altered and modified in the above said manners and in result of that the PP-132 and PP-133 will also be amended, altered and modified in the above said manners.
- i. That all other available grounds will be agitated at the time of arguments advanced before this Honourable Tribunal.

PRAYER

Under the above stated facts, it is therefore, most respectfully prayed that the petition in hand may kindly be accepted and resultantly NA-117, NA-118 and PP-132 and PP-133 may be amended, altered and modified in the light of

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MUHAMMAD ARIF
Advocate High Court
Cash Commission of
Lahore High Court Lahore.
26-03-18



above stated submissions, in the interest of justice equity and fair play.

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It is further prayed that the map of PP-133 may be corrected as per available record at the moment.

Any other relief which this Honourable Court deems fit and proper may also be awarded.

Arfan

Through

PETITIONER

ARFAN AHMED KHAN
Advocate High Court

SHAHEEN IKHLAQ
Advocate High Court
Office No. 130-131
Memoona Subhan Center
Farid Kot Road, Lahore.

Dated: 26-03-2018

CERTIFICATE

As per instructions of my client this is the first petition on the subject before this Honourable Court.

ADVOCATE

ATTESTED

MUHAMMAD ARIF
Advocate High Court
Cada Commission
Lahore High Court Lahore.

26-03-18