

BEFORE THE CHIEF ELECTION COMMISSION OF PAKISTAN,  
ISLAMABAD

1. Zahid Naseem S/o Muhammad Ishaq, R/o Jodh Pur, P.O. Bhowana Daas, Tehsil & District Gujranwala.
2. Jamshaid Farooq S/o Sultan Ali, R/o House No.41, Mohallah 35, X-Block, Peoples Colony, Gujranwala.
3. Rehman Hafeez S/o Abdul Hafeez, R/o Street Mandar Wali, House No.566-CB, Rahwali, Tehsil & District Gujranwala.
4. Muhammad Usman S/o Khadim Hussain, R/o Khunrray, P.O. Wahndo, Tehsil Kamoki, District Gujranwala.
5. Ghulam Mustafa Cheema S/o Inayat Ullah Cheema, R/o Dastagir Town, Jandiyala Bagh Wala, Tehsil & District Gujranwala.

Representation/Objection under section 20&22 of Election Act, 2017 read with Rule 12 of Election Rules 2017.

Respectfully Sheweth:-

1. That the applicants are the residents and voter members of different constituencies of District Gujranwala and are politically active citizens of the respective constituencies.
2. That the District Gujranwala consists of 06 National Assembly Seats according to new de-limitation 2018. The respective constituencies are NA-79 to NA-84.
3. That the constituencies that have been de-limitation have not been historically and traditionally as such, the new de-limitation has

altered/changed the historical perspective of most of the constituencies of District Gujranwala.

4. That the procedure that had to be followed in the making of the new constituencies was to go clock wise which has not been followed and gerrymandering in the procedure is visible.
5. That constituency No.NA-84 includes area of Emanabad which has never been part of this constituency since 1970 and does not have any physical or communication link with the constituency. It also does not constitute to be a compact block.
6. That NA-80 has been made in a Semi-circle shape which can be seen on the map, which creates hurdles for the inhabitants of the constituency to create a natural physical and communication link with one another.
7. That the different constituencies of the District are not proportionately distributed equally in population with one constituency having greater population than the other. However, with the proposed representation of the applicants, the population can more or less be equally distributed amongst different constituency.
8. That the Secretary Election Commission of Pakistan Mr. Babar Yaqub is the resident of NA-84 who is the brother of Dr. Aamir (candidate NA-84) under his influence NA-84 has been formed to favour his brother. The area of Emanabad included in this constituency is a part of this manipulation by the Secretary. The addition of

area of Emanabad as mentioned above does not form a compact block with other parts of constituency NA-84 and does not have a proper physical and communication link with the constituencies.

**PRAYER:-**

In view of the submission made above, it is, therefore, most respectfully prayed that the proposed representation of the applicants may kindly be allowed and the constituencies may kindly be made according to the Rules provided in the Election 2017, in the best interest of justice, equity and fair-play.

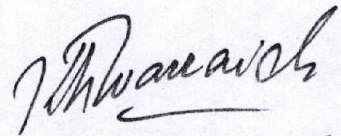
Any other relief which this Honourable Court deems fit and proper may kindly be awarded to the applicant.

APPLICANT


Through:-



**Hafiz Ansar-ul-Haq**  
Advocate Supreme Court



**Khalid Pervaiz Warriach**  
Advocate Supreme Court



**Sohail Manzoor**  
Advocate High Court  
Bhoon Law Chambers  
1-Turner Road, Lahore

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Gujranwala

NA 79-84

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3.	Annexure B	Proposed list
4.	Annexure C	Approved MAP

5. water Blockcode : 164040804

Gujranwala.