

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

APPEAL NO. _____ / 2018.

Rana Naeem ur Rehman Khan S/o Rana Abdul Rehman Khan, Caste Rajput, Resident of Mandiala Warriach, Tehsil & District Gujranwala, Voter of NA-80 & Serial No. 106, Block Code 164380904.

PETITIONER

VERSUS

Election Commission of Pakistan, Islamabad.

RESPONDENT

**APPEAL AGAINST DELIMITATION OF NA-80,
DISTRICT GUJRWALA ISSUED BY ELECTION
COMMISSION OF PAKISTAN DATED: 05.03.2018.**

Respectfully Sheweth:-

1. That the addresses and names of the necessary & proper parties are given on head note of this petition for service of summon of notices which may be issued by this Honourable Election Commission.
2. That the said list Delimitation of Constituency NA-80 Gujranwala, is against the Chapter No. 3, Sec. 12, Clause 5 of Rules of Election Commission of Pakistan, which is absolutely illegal, unlawful, without any lawful justification and against facts.
3. That prior to this, District Gujranwala, have 7 NA Halqas, but in the present delimitation list, Ex-NA-98 has

dissolved and now 6 NA Halqa District Gujranwala have remained.

4. That the area / boundaries of previous Halqa Ex-NA-98 is connected to all 6 NA Halqas of District Gujranwala.
5. That if the areas of Ex-NA-98 would connect with the nearest area of other 6 NA Halqas of District Gujranwala, and no changing would make in other 6 NA Halqas i.e. area of Halqa NA-98 M.C Ghakhar, P.C Banka Cheema, P.C Gill Wala, P.C Bhoma Bhath and P.C Kalaske have included in NA-79 according to new list of delimitation.
6. That whereas, the areas of Ex-Halqa NA-98, M.C Qila Didar Singh, Q.H Qila Didar Singh, Municipal Committee Ladhewala, may include in Halqa NA-84 Tehsil Nowshera Virkan which is nearest area of Ex Halqa NA-98.
7. That whereas, the areas of Ex Halqa NA-98 Town Committee Eminabad & Q.H Eminabad may include in NA-83 Tehsil Kamoke, which is away from 10 kilometer and its traveling time just 10 minutes.
8. That whereas, the areas of Ex Halqa NA-98 near to the Municipal Corporation, Gujranwala and other city Halqa may include in City Halqa, District Gujranwala.
9. That the issued list of Delimitation of Constituency NA-80, Gujranwala & other constituencies of NA, Gujranwala, is illegal, unlawful and against the Rules of 2017.
10. That the respondent has ignored the fact while issuing the above said list of delimitation HALQA-BANDI relating the nearest area & population of constituency of Gujranwala about the said list of delimitation.
11. That according to above narrated facts that all NA Halqas of District Gujranwala its areas and population

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would become according to Sec. 5, there is no need to amend the whole district.

12. That That according to above narrated facts that NA-80 should be consisted upon the such areass & population which detailed as under:-

- i. Gujranwala Cantt.
- ii. QH-Rahwali,
- iii. QH- Talwandi Musa Khan.
- iv. QH-Sadar, District Gujranwala.
- v. Charge No. 9,
- vi. Charge No. 12
- vii. Charge No. 38

13. That according to above narrated facts that NA-81 should be consisted upon the such area / populations which detailed as under:-

- i. Charge No. 6
- ii. Charge No. 7
- iii. Charge No. 8
- iv. Charge No. 13,
- v. Charge No. 14
- vi. Charge No. 15
- vii. Charge No. 16
- viii. charge No. 17
- ix. Charge No. 18
- x. Charge No. 19
- xi. Charge No. 20
- xii. Charge No. 32
- xiii. Charge No. 33
- xiv. Charge No. 34
- xv *Charge No. 10, 11*

14. That That according to above narrated facts that NA-83 should be consisted upon the such areass & population which detailed as under:-

- j. Tehsil Kamoke
- ii. QH-Eminabad,
- iii. Town Committee Eminabad.
- iv. Circle No. 10, 13, 15 of Charge No. 22.

15. That That according to above narrated facts that NA-84 should be consisted upon the such areass & population which detailed as under:-

- i. Tehsil Nowshera Virkan
- ii. M.C Qila Didar Singh
- iii. Q.H Qila Didar Singh

iv. M.C Ladhewala Warriach

16. That the respondent has issued the list of delimitation under appeal is absolutely wrong, false & incorrect, and against the fundamental rights of the petitioner and other voters of the circle.

In the light of above said circumstances and facts that the appeal against delimitation of NA-80 to NA-84 District Gujranwala, issued by election commission of Pakistan dated: 05.03.2018 may please be reviewed and the suggestions of the petitioner may please be accepted for the best interest of justice & equity.

PETITIONER

0300-6446080

0300-8111000

Dated: _____

THROUGH COUNSELS:

0300-6446080

MANZOOR QADIR BHINDER
Advocate High Court,
40-Jinnah Chamber,
District Courts, Gujranwala.

SHEIKH MUHAMMAD ARFAN
Advocate High Court,
33-Jinnah Chamber,
District Courts, Gujranwala.

0333-8107358

SARDAR SARFRAZ AHMAD KHAN
Advocate High Court
40-Jinnah Chamber,
District Courts, Gujranwala

0334-4263711

VERIFICATION:

Verified on Oath at Gujranwala, on this ___th of April, 2018, that the contents of all the above said petition are true and correct to best of my knowledge and correct on the basis of my information and belief. Nothing has been misstated or concealed therein.

PETITIONER