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Zeeshan Dogar

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



Petition No. _____/2018

Zeeshan Dogar S/o Amjad Ali Dogar R/o Mohallah Kot
Nadeem Saleem Kot, UC-46 Kot Ranjeet, Tehsil & District
Sheikhupura *0321-4456034*

**OBJECTION ~~N~~PETITION FOR AMENDMENT,
ALTERATION AND MODIFICATION IN THE
CONSTITUENCIES PP-136, PP-142, NA-119 & NA-121
SHEIKHUPURA, PUNJAB, UNDER SECTION 21 & 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-46 Kot Ranjeet fell within the constituency of PP-136 ibid and the Silsla Number 557. Shamariati Block code No.197010901 and CNIC No.35404-1593526-3. Copy of the voter list is attached herewith as **ANNEXURE-A**.
2. That according to primary/preliminary de-limitation the total population of PP-136 is 379495, PP-137 IS 394130, PP-135 is 376922, PP-140 is 338523, PP-141



is 401160 and PP-142 is 364258. Due to the following facts the present petitioner sought that the Patwar Circle Qilla Amir Singh may be included in PP-142 and after doing so there would be no effect on the population of both the constituencies i.e. PP-136 and PP-142 because the total population of the aforesaid Patwar Circle is about 9000. And similarly, due to desired, amendment, alteration etc the constituencies of NA 119, NA-120 and NA- 121 will not be disturbed. Copies of Maps are attached herewith as **ANNEXURE-B**.

3. That the present petitioner is residing within the local limits of District Sheikhpura and previously the vote of the present petitioner and the votes of other inhabitants of the Patwar Circle Qilla Ameer Singh fell within the constituency presently PP-142, former PP-166. But in the present delimitization of the constituencies the area of the present petitioner included in PP-136, former PP-163, and due to this fact the compatibility, physical feature, administrative structure and public communication etc. is disturbed and the present petitioner have various objections based upon geographical compactness of the areas in the light of population and seeks amendment,

 (3)

alteration and modification of the constituency on the following amongst other:-

GROUNDS

- a. That while acting under Election Act, 2017 the delimitation badly disturbed the constituency PP-136 and PP-142 because with regard to the distribution of population the geographical compactness was not followed and even did not bother to observe.

- b. That the physical features were also disturbed and the authorities did not bother to have a bird eye view because due to this delimitation, the boundaries of administrative units disturbed because previously the present petitioner and Patwar Circle Qilla Ameer Singh was adjacent to the Sheikhpura City and now due to new constituency the present petitioner has to face agony of long distance to approach the administrative unit which situated at the other corner of Muridkey City which is almost 37 kilometer away from Qilla Amir Singh and previously the administrative unit was at a distance of 03 Kilometer from Qilla Ameer Singh. So in the present scenario the administrative compatibility of Qilla Amir Singh is with Sheikhpura City, and the same fell within the constituency of PP-142. So the Patwar Circle of Qilla Amir Singh may be excluded from PP-136 and included in PP-142.

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- c. That apart from the fact that the present petitioner and other inhabitants of Qilla Amir Singh Patwar Circle has to travel almost 37 kilometer but the main painful fact is that there is no direct road available to Qilla Amir Singh, so as to approach the administrative Unit of City Muridkey.
 - d. That according to new constituency the public convenience is not available to the present petitioner.
 - e. That according to new delimitation all the registration work would definitely be transferred from City Sheikhupura to City Muridkey and in this way the definite inconvenience would be faced by the inhabitants of Qilla Amir Singh.
 - f. That if the Patwar Circle of Qilla Amir Singh will be excluded from PP-136 and included in PP-142 then the population of above said two constituencies would be balanced rather disturbance.
 - g. That there are so many other cognate factors which disturbed the homogeneity and geographical compactness of the area. So the constituency PP-136 & PP-142 is liable to be amended, altered and modified in the above said manners.
 - h. That all other available grounds will be agitated at the time of arguments advanced before this Honourable Tribunal.

PRAYER



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Under the above stated facts, it is therefore, most respectfully prayed that the petition in hand may kindly be accepted and resultantly Patwar Circle Qilla Amir Singh may be excluded from PP-136 and included in PP-142 in the interest of justice equity and fair play.

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




PETITIONER

Through



ARFAN AHMED KHAN
Advocate High Court



AHMED NAWAZ
Advocate High Court

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Dated: 31-03-2018

CERTIFICATE

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



ADVOCATE