



(1)

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

Petition No. _____/2018

Muhammad Zulqarnain son of Umer Hayat, resident of village Rana Khizer Abad, Post Office Mor Khunda, Tehsil and District, Nankana Sahib.

PETITIONER

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

Respectfully Sheweth:-

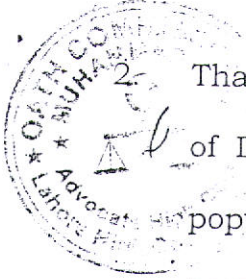
1. That the present petitioner is the Voter Member of UC-41 Rehanwala District Nankana fell within the constituency of PP-134 ibid and the Shumariati Block Code 201050104, Silsala No.125 and CNIC No.35402-1762847-5. Copy of the voter list is attached herewith as **ANNEXURE-A**.

ATTESTED

MUHAMMAD ARIF
Advocate High Court
Cath. Court
Lahore High Court, Lahore.

26-03

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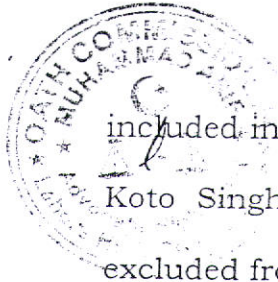


That according to new delimitation the total population of District Nankana Sahib is 1356376 and the total population of PP-134 is 338523 and of PP-133 total population is 335513. It is pertinent to mention here that due to the delimitation, the present petitioner has serious and solid objections regarding the same because the petitioner is going to contest the upcoming general election for the seat of PP-133. That according to the new delimitation the compactness is disturb because Qilla Koto Singh, Malikpur and Tawri Allah Yar has been included and Buche Ke has been excluded from PP-133. The geographical compactness was not followed by the authorities at the time of delimitation. The total population of Buche Ke is 36026, Qilla Koto Singh PC 5414 and total population of the Malikpur PC is 5580 and total population of Tawri Allah Yar PC is 8808 and from last more than 30 years the administrative convenience was enjoyed by the population of Buche Ke while living in same constituency and in the new delimitation they were excluded and Qila Koto Singh, Malikpur and Tawri Allah Yar PC have been added. So in this scenario keeping in mind the geographical compactness and administrative convenience of Buche Ke may be

ATTESTED

MUHAMMAD ARIF
Advocate
Cath. Court
Lahore. P.O. Court Lahore.

26-03-2010



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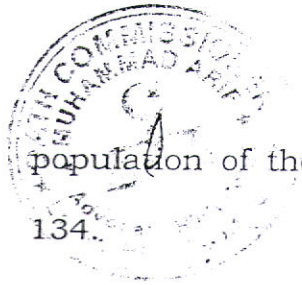
included in PP-133 and excluded from PP-134 and Qila Koto Singh, Malikpur and Tawri Allah Yar may be excluded from PP-133 and included in PP-134. Copy of Map is attached herewith as ANNEXURE-B.

3. 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.
4. That PP-133 & PP-134 are fallen in NA-118 and PP-131 & PP-132 are fallen in NA-117. The petitioner is not disturbing NA-117, PP-131 and PP-132 and in case of any change in PP-133 & PP-134, the same will not disturb NA-117, PP-131 and PP-132. Similarly, if there is any disturbance in PP-133 & PP-134 will happen, then it would not disturb NA-118 and NA-117.
5. That in the light of purposed amendment, alteration etc., there would be no major change in ratio of

ATTESTED

MUHAMMAD ARIF
Advocate High Court
Civil Court No. 10
Lahore High Court, Lahore.

26-03-2018



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population of the constituencies i.e., PP-133 and PP-134.

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

GROUND

- a. That while acting under Election Act, 2017 the delimitation badly disturbed the constituency PP-134 and PP-133 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 the present petitioner had geographical compactness if the afore stated Patwar Circle Buche Ke may be included in PP-133 and excluded from PP-134 and similarly Qila Koto Singh, Malikpur and Tawri Allah Yar may be excluded from PP-133 and included in PP-134 and if

ATTESTED

MUHAMMAD ARIF
Adviser
Qath
Lahore
26-03-2018



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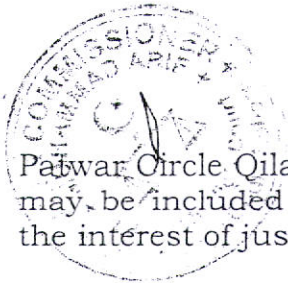
The same will be done there will be no effect on population of the PP-133 and PP-134.

- c. That the map of PP-133 and PP-134 is liable to be corrected.
- d. That according to new constituency the public convenience is not available to the present petitioner.
- e. That due to new delimitation the existing boundaries of administrative units have been disturbed.
- f. That due to new delimitation, the public convenience is disturbed.
- g. That there are so many other cognate factors which disturbed the homogeneity and geographical compactness of the area. So the constituency PP-133 & PP-134 are 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

Under the above stated facts, it is therefore, most respectfully prayed that the petition in hand may kindly be accepted and resultantly Patwar Circle Buche Ke may be excluded from PP-134 and included in PP-133 and similarly

MUHAMMAD ARIF
Advocate
Office
Lahore
26-03-2018
Lahore.



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Patwar Circle Qila Koto Singh, Malikpur and Tawri Allah Yar may be included in PP-134 and excluded from PP-133, in the interest of justice equity and fair play.

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.

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PETITIONER

[Handwritten signature]

ARFAN AHMED KHAN
Advocate High Court

[Handwritten signature]
SHAHEEN IKHLAQ
Advocate High Court

Office No. 130-131
Memoona Subhan Center
Farid Kot Road, Lahore.

Through

Dated: 26-03-2018

CERTIFICATE

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

[Handwritten signature]

ADVOCATE

ATTESTED

MUHAMMAD ARIF
Advocate High Court
Lahore

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26-03-2018



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

Petition No. _____/2018

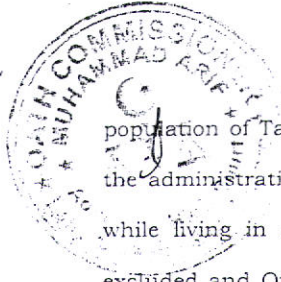
AFFIDAVIT OF

Muhammad Zulqarnain son of Umer Hayat, resident of village Rana Khizer Abad, Post Office Mor Khunda, Tehsil and District, Nankana Sahib.

I, the above named deponent do hereby solemnly affirm and declare as under:-

1. That the present petitioner is the Voter Member of UC-41 Rehanwala District Nankana fell within the constituency of PP-134 ibid and the Shumariati Block Code 201050104, Silsala No.125 and CNIC No.35402-1762847-5. Copy of the voter list is attached herewith as **ANNEXURE-A**.
2. That according to new delimitation of PP-134 the total population of PP-134 is 338523 and of PP-133 total population is 335513. 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 PP-133. That according to the new delimitation the compactness is disturb because Qilla Koto Singh, Malikpur and Tawri Allah Yar has been included and Buche Ke has been excluded from PP-133. The geographical compactness was not followed by the authorities at the time of delimitation. The total population of Buche Ke is 36026, Qilla Koto Singh PC 5414 and total population of the Malikpur PC is 5580 and total

ATTESTED
MUHAMMAD ARIF
Advocate High Court
Oath Commissioner,
Lahore High Court Lahore.
26-03-2018



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population of Tawri Allah Yar PC is 8808 and from last more than 30 years the administrative convenience was enjoyed by the population of Buche Ke while living in same constituency and in the new delimitation they were excluded and Qila Koto Singh, Malikpur and Tawri Allah Yar PC have been added. So in this scenario keeping in mind the geographical compactness and administrative convenience of Buche Ke may be included in PP-133 and excluded from PP-134 and Qila Koto Singh, Malikpur and Tawri Allah Yar may be excluded from PP-133 and included in PP-134. Copy of Map is attached herewith as ANNEXURE-B.

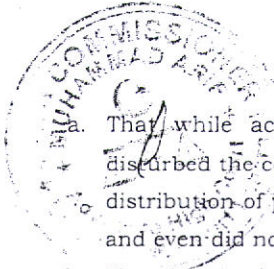
7. That according to the narration of constituencies available on record of Election Commission of Pakistan (population and household detail from block to district level) Barkhudar and Badhe are fallen in Nankana Sahib-II (PP-133) but the map issued by the office of election commission of Pakistan was 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.
8. That PP-133 & PP-134 are fallen in NA-118 and PP-131 & PP-132 are fallen in NA-117. The petitioner is not disturbing NA-117, PP-131 and PP-132 and in case of any change in PP-133 & PP-134, the same will not disturb NA-117, PP-131 and PP-132. Similarly, if there is any disturbance in PP-133 & PP-134 will happen, then it would not disturb NA-118 and NA-117.
9. That in the light of purposed amendment, alteration etc., there would be no major change in ratio of population of the constituencies i.e., PP-133 and PP-134.
3. 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 seeks amendment alteration and modification of the constituency on the following amongst others:-

GROUNDS

ATTESTED

MUHAMMAD ARIF
Advocate High Court
Qadh Court, Faisalabad
Lahore High Court, Lahore

16-03-2018



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- a. That while acting under Election Act, 2017 the delimitation badly disturbed the constituency PP-134 and PP-133 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 the present petitioner had geographical compactness if the afore stated Patwar Circle Buche Ke may be included in PP-133 and excluded from PP-134 and similarly Qila Koto Singh, Malikpur and Tawri Allah Yar may be excluded from PP-133 and included in PP-134 and if the same will be done there will be no effect on population of the PP-133 and PP-134.
- c. That the map of PP-133 and PP-134 is liable to be corrected.
- d. That according to new constituency the public convenience is not available to the present petitioner.
- e. That due to new delimitation the existing boundaries of administrative units have been disturbed.
- f. That due to new delimitation, the public convenience is disturbed.
- g. That there are so many other cognate factors which disturbed the homogeneity and geographical compactness of the area. So the constituency PP-133 & PP-134 are 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.

Zulgora

DEPONENT

VERIFICATION

Verified on Oath at Lahore this 26th day of March, 2018 that the contents of above affidavit are true and correct to the best of my knowledge and belief and nothing has been concealed therein

Zulgora

DEPONENT

ATTESTED

MUHAMMAD ARIF
Adviser to the Court
Court of Sessions
Lahore High Court, Lahore.

26-03-18