



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

Petition No. \_\_\_\_\_/2018

**MUHAMMAD ASHRAF JAVED** son of Farzand Ali Khan,  
resident of Pacca Qilla, Post Office Khas, Tehsil and District,  
Nankana Sahib.

**PETITIONER**

**OBJECTION PETITION FOR AMENDMENT, ALTERATION  
AND MODIFICATION IN THE CONSTITUTIANCY PP-  
134,PP-133,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-51 Kot Bhinidas District Nankana fell within the constituency of PP-134 ibid and the Shumariati Block Code 201080408, Silsala No.10 and CNIC No.35202-8917143-3. Copy of the voter list is attached herewith as **ANNEXURE-A**.

**ATTESTED**

**MUHAMMAD ARIF**  
Advocate High Court  
Oath Court  
Lahore High Court  
26-05-2018

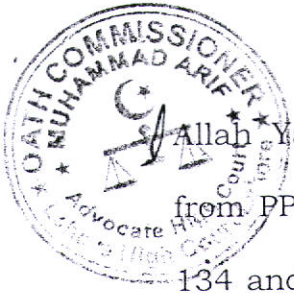
2. That according to new delimitation the total population

**ATTESTED**

MUHAMMAD RIF  
Advocate  
Qath  
Labour Court

of District Nankana Sahib is 1356374 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-134. That according to the new delimitation the compactness is disturb because Qilla Koto Singh, Malikpur and Tawri Allah Yar has been excluded and Buche Ke has been included in PP-134. 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 Qilla Koto Singh, Malikpur and Tawri Allah Yar while living in same constituency and in the new delimitation they were excluded and Buche Ke PC has been added. So in this scenario keeping in mind the geographical compactness and administrative convenience Qilla Koto Singh, Malikpur and Tawri





B

Allah Yar may be included in PP-134 and excluded from PP-134 and Buche Ke may be excluded from PP-134 and included in PP-133. 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  
Oath Commissioner  
Lahore High Court Lahore.

**ATTESTED**

MUHAMMAD ASIF  
Advocate  
Lahore High Court, Lahore.

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 Circles may be included in PP-134 and excluded from PP-133 and similarly Buche Ke may be excluded from PP-134 and included in PP-

**ATTESTED**

MUHAMMAD ASIF  
Advocate  
Oath Commissioner  
Lahore High Court, Lahore.



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

- c. That the map of PP-134 and PP-133 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-134 & PP-133 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

**ATTESTED**  
MUHAMMAD ARIF  
Advocate High Court  
Oath Commissioner  
Lahore High Court Lahore.

(6)

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.

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



Through

*Arif*  
**PETITIONER**

*Arif*  
**ARFAN AHMED KHAN**  
Advocate High Court

*Arif*  
**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.

*Arif*  
**ADVOCATE**

**ATTESTED**

*Arif*  
**MUHAMMAD ARIF**  
Advocate High Court  
Oath Commissioner  
Lahore High Court Lahore.



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

(7)

Petition No. \_\_\_\_\_/2018

**AFFIDAVIT OF**

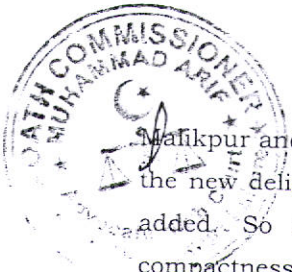
Muhammad Ashraf Javaid son of Farzand Ali Khan, resident of Pacca Qilla Post Office Khas, Tehsil and District Nankana Sahib.

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

1. That the present petitioner is the Voter Member of UC-51 Kot Bhinidas District Nankana fell within the constituency of PP-134 ibid and the and the Shumariati Block Code 201080408, Silsala No.10 and CNIC No.35202-8917143-3. 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-134. That according to the new delimitation the compactness is disturb because Qilla Koto Singh, Malikpur and Tawri Allah Yar has been excluded and Buche Ke has been included in PP-134. 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 Qilla Koto Singh,

**ATTESTED**

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



(8)

Malikpur and Tawri Allah Yar while living in same constituency and in the new delimitation they were excluded and Buche Ke PC has been added. So in this scenario keeping in mind the geographical compactness and administrative convenience Qilla Koto Singh, Malikpur and Tawri Allah Yar may be included in PP-134 and excluded from PP-134 and Buche Ke may be excluded from PP-134 and included in PP-133. 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.
7. 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.
4. 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.
5. 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**

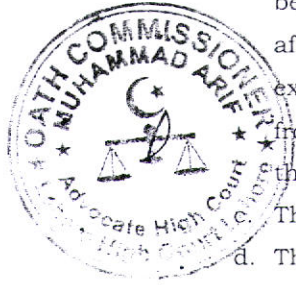
- a. That while acting under Election Act, 2017 the delimitation badly disturbed the constituency PP-134 and PP-133 because with regard to the distribution of population the geographical compactness was not followed and even did not bother to observe.
- b. That the physical features were also disturbed and the authorities did not bother to have a bird eye view because due to this

**ATTESTED**

MUHAMMAD ARIF  
Advocate  
Oath Commissioner  
Lahore High Court Lahore.

26/03/17





delimitation, the boundaries of administrative units disturbed because the present petitioner had geographical compactness if the afore stated Patwar Circles may be included in PP-134 and excluded from PP-133 and similarly Buche Ke may be excluded from PP-134 and included in PP-133 and if the same will be done there will be no effect on population of the PP-134 and PP-133.

That the map of PP-134 and PP-133 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-134 & PP-133 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.

*Arif*

DEPONENT

**VERIFICATION**

Verified on Oath at Lahore this 26<sup>th</sup> 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

*Arif*

DEPONENT

**ATTESTED**

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

*Arif*