

TO,

THE SECRETARY ELECTION COMMISSION OF PAKISTAN, OFFICE AT G-5/2,  
CONSTITUTIONAL AVENUE ISLAMABAD

MEMORANDUM OF OBJECTIONS/REPRESENTATION PETITION UNDER  
SECTION 21(3) OF ELECTIONS ACT, 2017 READ WITH RULE 12 OF THE  
ELECTION RULES, 2017 AGAINST DELIMITATION OF PROVINCIAL  
CONSTITUENCY PP-49 NAROWAL-IV BY MUHAMMAD NAWAZ SHAKAR SON  
OF MUHAMMAD AZAM, RESIDENT OF SARJAL, POST OFFICE FATA TOOR,  
TEHSIL ZAFFAR WAL, DISTRICT NAROWAL.

Sir, it is humbly submitted as under:-

1. That the objector / petitioner having CNIC No. 34501-2017887-7  
(Annexure-A) is permanent resident of Sarjal, Post Office Fata Toor,  
Tehsil Zaffar Wal, District Narowal and is registered voter of PP-49  
Narowal-IV, under senses block code # 257021305, serial No.27,  
Constituency Area of Sarjal, Zaffar Wal, Narowal (Annexure-B). the  
petitioner shall produce the following witnesses at hearings namely:-

1. Hafiz Muhammad Ashraf son of Muhammad Ismail
2. Mujahid Ali son of Muhammad Azam
3. Mushtaq Ahmad son of Karim Bakhsh
4. Kashif son of Ijaz Ahmad
5. Zahid Ali son of Naazar Hussain
6. Ghulam Ahsan Farooq son of Ghulam Nabi
7. Bashir Ahmad son of Gohar Ali
8. Muhammad Asghar son of Noor Muhammad
9. Muhammad Bashir son of Muhammad Sharif
10. Muhammad Ashraf son of Muhammad Iqbal
11. Ghulam Murtaza son of Muhammad Sharif
12. Muhammad Abbas son of Sardar Ahmad
13. Muhammad Zeeshan son of Amjad Ali
14. Muhammad Zubair son of
15. Ilyas Ahmad son of Nazir Ahmad
16. Muhammad Iqbal Baig son of Munir Baig
17. Muhammad Yasin Baig son of Nasir Ahmad Baig
18. Karamat Ali son of Nabay Khan
19. Hafiz Muhammad Yasir son of Muhammad Azam
20. Muhammad Akram son of Sardar Ahmad
21. Muhammad Shamar son of Irshad Ahmad
22. Muhammad Naseem son Mian Sardar Ali
23. Zulfiqar Hussain son of Allah Mahi
24. Mushtaq Ahmad son of Muhammad Shafi
25. Muhammad Afzal Anjum son of Muhammad Siddique
26. Muhammad Sarwar son of
27. Ghulam Ali son of Ibrahim
28. Mushtaq Hussain son of Noor Hussain
29. Mubarik Ali son of Muhammad Sharif
30. Ch. Ghulam Hussain son of Muhammad Shafique
31. Rasheed Ahmad son of Fazal Ahmad

32. Muhammad Iqbal son of Allah Rakha
33. Habib Ullah son of Allah Rakha
33. Muhammad Riaz Anjum son of Lal Din
34. Shahbaz Ali son of Bashir Ahmad Shah
35. Shabbir Hussain son of Rasheed Ahmad
36. Muhammad Tufail son of Baloch Din Chohan

*Handwritten signature and date: 21/07/18*

The said witnesses are from the same constituency with details of their votes and block codes given in Annexure-C.

2. That previously this Constituency was PP-136 Narowal-V and its polling Scheme was notified by the RO Concerned on 23-04-2013 which is attached herewith as Annexure-D. There is no change in the District Narowal about Provincial Constituencies except change of Number of Constituency from PP-136 Narowal-V to PP-49 Narowal-IV.
3. That as per Notification No. F.10 (116)/2002-Cord. Dated 28<sup>th</sup> June, 2002 by the Election Commission of Pakistan, the areas included in PP-136 and other PPs in district Narowal were defined. The total Constituencies for PP in Narowal were PP-132 Narowal-I, PP-133 Narowal-II, PP-134 Narowal-III, PP-135 Narowal-IV, PP-136 Narowal-V which becomes five in numbers. Copy of which is attached herewith as Annexure-E.
4. That now as per Public Notification issued by the Election Commission of Pakistan U/S 21 of Elections Act, 2017 and Rule 11 of the Election Rules, 2017, draft list for Delimitation of Provincial Constituencies as well as Constituencies for National Assembly are made. There is no change in the PP and NA Constituencies specifically for PP Constituencies except change of number of the Constituencies in serial as per section 20 of the Elections Act, 2017 and the rules. The total Constituencies for PP in Narowal now are drafted as PP-46 Narowal-I, PP-47 Narowal-II, PP-48 Narowal-III, PP-49 Narowal-IV, PP-50 Narowal-V which becomes five Provincial Constituencies Annexure-F.
5. That the Provincial Assembly Constituency of PP-49 Narowal-IV is one of the most effected Constituency of the Province of Punjab wherein new Delimitation is drafted, which has severely disrupted the local areas and the Population of the Constituency by excluding the areas previously in PP-136 Narowal-V and newly adding new area in PP-49 Narowal-IV as

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mentioned in previously finalized delimitation and present draft of delimitation, hence when there is no change in the Constituency except change of number of the Constituency, then there should no change in the area in the delimitation.

6. That as per old constituency PP-136 Narowal-V, the whole area of the constituency was connected to each other and very convenient for the local population to access and easily participate in the election process and exercise their right of votes.
7. That the due to the new draft of delimitation, the areas of the connected Constituency have deliberately been disconnected from the old area of the Constituency illegally, unlawfully and without any reasons and change and the local residents of the Constituency are disturbed.
8. That the new draft delimitation has been done by the Committee beyond actual and physical existence at Constituency and against the basic principles of Convenience for the local residents.
9. That the petitioner is one of the aggrieved people from the old Constituency and new draft delimitation and has legal right to file the objections/representation under the law for restoration of the old delimitation as it was before the change of PP numbers.
10. That as there in no change in the Constituency except change of number as PP-49 Narowal-IV from PP-136 Narowal-V, hence it does not fall under the category of delimitation as prescribed by the Official Gazette nor there was any need to include or exclude the areas, therefore, the new delimitation for adding and excluding the areas is not correct for geographically compact area and is against the law..
11. That as per maps of new and old Constituencies certain adjacent areas have been excluded from the Constituency PP-49 Narowal-IV and other non-related areas situated far from the actual Constituency have been added illegally and unlawfully and against the principles of delimitation and the grounds given in section 20 of the Elections Act, 2017 and the Rules by ignoring the Physical features, existing Convenience and other

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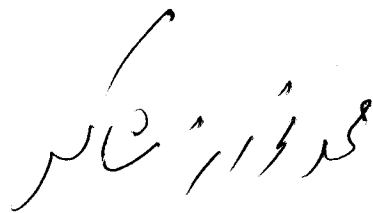
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Cognate factors to ensure homogeneity in the creation of Constituencies.  
Hence it is to be restore as it was of PP-136 Narowal-V. Copies of Maps  
are attached herewith as Annexures-G, H, I, J, K, L, M and N.

Under the above narrated circumstances, it is, therefore, most respectfully and humbly prayed that while accepting this objection petition / representation, the impugned draft of delimitation for PPs in District Narowal may please be not confirmed and previous delimitation of PP-136 Narowal-V may please be confirmed for changed PP-49 Narowal.

It is further prayed that the excluded areas may kindly be directed to be added in the Constituency as it was part of PP-136 Narowal-V and the included areas may kindly be ordered to exclude from the Constituency PP-49, Narowal-IV confirming the previous areas of delimitation for present changed number Constituency.

Any other relief which this Hon'ble Court deems fit and proper may also be granted to the petitioner.



Objection petitioner/Petitioner

MUHAMMAD NAWAZ SHAKAR SON OF MUHAMMAD AZAM, RESIDENT OF SARJAL, POST OFFICE FATA TOOR, TEHSIL ZAFFAR WAL, DISTRICT NAROWAL. Mobile No.03007768088

Through

Counsel/authorised person

Rana Farhan Khan  
Advocate



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