

①

h

MEMORANDUM IN REGARD OF DISTRICT NANKANA
SAHIB BEFORE THE WORTHY SECRETARY ELECTION
COMMISSION OF PAKISTAN ISLAMABAD

Rai Barkhadar son of Rai Mian Khan by caste Kharal, resident of Kot Ameer, P.O Buchyki, Tehsil and District Nankana Sahib CNIC No. 35402-1832536-5 telephone No. 0300-4484570,0300-7843652

Petitioner.....

Versus

Secretary Election Commission of Pakistan, Islamabad

Subject: Objection Petition regarding constituency No. PP-133, Nanakana Sahib-III for inclusion PCs Buddhy 10839 , Barkhudar 6368, Kot Fazal 5637 and Kot Namdar 6139 constituency of PP 133 District Nankana Sahib.

Respected Sir,

1. That the petitioner is resident of Kot Ameer, P.O Buchykai, District Nankana Sahib is enrolled voter member serial No. 8, Census Block Code 201020805 bearing CNIC No. 35402-1832536-5 copy of vote certificate is attached here with as annexure A.
2. That the election commission of Pakistan has published the preliminary delimitation of. all constituency of Nankana Sahib through a public notice copy is attached here with as annexure B.
3. That the delimitation of PP 133 Nankana Sahib III Formulated by the election commission violation of all the principles rules section and previsions laid down Act 2017, the Map of preliminary delimitation of all constituencies is attached here with as annexure C.
4. That the preliminary delimitation of constituency No. PP133 Nankana Sahib III is against the law facts rules and provisions as well as sections laid down in delimitation Act 2017 and Is liable to be rectified while with the exclusion of population of PCs Buddhy 10839 , Barkhudar 6368, Kot Fazal 5637 and Kot Namdar 6139 constituency of PP 133 District Nankana Sahib on the following grounds

Grounds

- a. That the population of constituency No. PP 133 Nankana Sahib III is 335513 where as the population of constituency No. PP 134 Nankana Sahib IV is 338523. Meaning there by no any special deference of a huge population of 3010 which is the rule of parity of population that the PCs mentioned above maps that has attached as annexure C is not match according to ground reality.
- b. That the applicant is a candidate of the provincial assembly and myself union council and QH is divided between two constituencies of Nankana Sahib III and IV if my opinion has to response then the constituencies are not effected any lose and injury.
- c. There is the division of the huge population among the three union councils and QHs. This gap can be conclude to attached the PCs along with population Chand Pur 6017, Haft Madar 5432, Jatri 9704, Masoo 10099, constituency of PP 134 District Nankana Sahib. The ground reality and easy assess of the PCs are very closely to constituency No. PP 133 and PP 134.
- d. That the length of the constituency of PP 134 Nankana Sahib is on the beach of the Ravi River. The division of the budget is effected on the constituency of PP 134 Nankana Sahib and damage during the flood of Ravi River. There is also injustice between the constituencies.
- e. That the my opinion has adopted then the division of PCs between both constituency No. PP 133 and PP 134 are equal according to budget and development.
- f. That the map is wrongly and unlawful issued from the election commission of Pakistan. Because the route Map is suitable and easy approached for attached the PCs Buddhy 10839, Barkhurdar 6368, Kot Fazal 5637 and Kot Namdar 6139 with the constituency of No. PP 134.
- g. That the map of the election commission is mentioned the PCs Buddhy, Barkhurdar and Kot Fazal in the constituency of PP 134 is correctly because it is a ground reality and legal.
- h. That the petitioner want to save the PCs and QH populations in the constituency of PP 134 that is a right of petitioner constituency.

Prayers

3

9

It is therefore respectfully prayed under the circumstances that the PCs Buddhy 10839 , Barkhudar 6368, Kot Fazal 5637 and Kot Namdar 6139 constituency of PP 133 District Nankana Sahib are excluded from the PP 133 and included PP 134 and PCs Chand Pur 6017, Haft Madar 5432, Jatri 9704, Masoo 10099, constituency of PP 134 District Nankana Sahib are excluded from PP 134 and included 133. It is humble that the PCs of PP 133 are delimitation and transferred from notification PP 133 to PP 134 my opinion is fit and fair the population of both constituencies are equal as under:

PP-134 - 336254

PP-133 - 337782

There is a little difference of population only 1528 there is not huge difference under the law and any other rules and provisions may kindly be passed in favour of the applicant. Any other relief which this Honorable Court deems fit and proper, may also be awarded.

Zailbedar
Petitioner

Through Council

Farooq
Rai M. FARUQ HAYAT
Advocate High Court

Rai Nasir Ali Kharal
Rai Nasir Ali Kharal
Advocate High Court
Khosa Law Chamber
1 Turner Road, Lahore.

Date: April 2, 2018

Certificate

As per instructions of my client this is the first petition of this subject before this honorable court.

Rai Nasir Ali Kharal
Advocate