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BEFORE THE WORTHY SECRETARY ELECTION
COMMISSION OF PAKISTAN, ISLAMABAD

Syed Faheem Hussain Shah S/o Syed Manzoor Hussain
Shah R/o Mouza Hassan Shah, P.O Karam Pur, Tehsil
Mailsi, District Vehari, Cell No. 0300-8670417.

.....PETITIONER

Vs.

Election commission of Pakistan, Islamabad.

RESPONDENT

MEMORANDUM/OBJECTION PETITION AGAINST
THE PRELIMINARY DELIMITATION / DRAFT OF
CONSTITUENCIES NO. PP-232 TO PP-234
DISTRICT VEHARI PROVINCE PUNAB
PUBLISHED BY THE ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD

Respected Sheweth,

1. That the petitioner is resident of Mouza Hassan
Shah, P.O Karam Pur, Tehsil Mailsi, District
Vehari and is enrolled voter to constituency No. PP-232
Vehari at Sr. No. 365 Gharana No. 118, in Census Code
No. 207041303 in Circle No. Hassan Shah, Mailsi,
District Vehari (Copy of vote certificate is attached
Annexure-A.

2

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2. That the Election Commission of Pakistan has published the preliminary delimitation / draft of all constituencies of District Vehari through a Public Notice (Copy is attached herewith as Annexure-B).

3. That the delimitation of constituencies PP-232 to PP-234 District Vehari formulated by the Election Commission of Pakistan is just the violation of all the principles, Rules, Sections and provisions laid down the Delimitation Act 2017, as well as the Delimitation Rules 2017. The map of preliminary delimitation of all constituencies is attached herewith as Annexure-C.

4. That the preliminary delimitation of constituency No. PP-232 to PP-234 District Vehari is against the law facts rules procedure principles and provisions as well as sections laid down in Delimitation Act 2017 and is liable to be rectified on the following:-

GROUNDS

(3)

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naturally which can be perused in the map of Vehari. (Copy of map is attached). On the South area side there is Satluj River and in the South area side there is a large and huge area of Kacha. Its length of populated area is about 100 KM where as its width is about 60 KM. so it can't be divided and delimited from East to West. Which is against the nature which disturbing all the infrastructure, common sources of communication existing boundaries Schools, Hospitals, Municipal Committees, compactness of areas as well as public convenience and public interest.

IV) That according to National Assembly constituency of NA-163, there are four different districts consists on Bahawalpur, Bahawalnagar, Pakpattan and Sahiwal and approximately all the provincial constituencies of Vehari have been delimited and divided from East to West. Which is against the Law Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

(2)

(7)

21/01/2008

I) That the District Vehari consisting upon 8 Provincial Constituencies of Province Punjab bearing Constituency No. PP-229 TO PP-236 District Vehari and three Tehsils i.e. Malisi, Borewala and Vehari were consisting upon 8 constituencies, the detail of constituencies are as under:

NA-162	PP-229	Borewala,	P-230 Borewala
NA-163	PP-231	Vehari-Borewala.	
	PP-232,	Vehari-Malisi	
NA-164	PP-233, Vehari-Mailsi,	PP-234, Vehari-Mailsi	
NA-165	PP-235, Malisi,	PP-236, Malisi	

whereas District Vehari was divided into 8 constituencies, and all constituencies were with in the limits, premises and boundaries of its Tehsils.

II) That as the population has been increased so its impossible to keep all the constituencies with in its Tehsil boundaries.

III) That the existing boundaries of District Vehari as well as its 3 Tehsils are from North to South

5

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V) That presently in the preliminary Delimitation / draft if we travel in the same provincial constituency we have to cross several provincial constituencies in the way and there is no direct link and source of common communication from one part of the constituency to the other part.

VI) That Tehsil Vehari has been delimited into different provincial constituencies and even some provincial constituencies are under the different 4 National Assembly Constituencies which is against the fundamental violation of Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

VII) That draft of all the provincial constituencies is a violation of fundamental Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017, and is liable to be rectify under the proposal of petitioner.

6

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VIII) That the total population of District Vehari was to be divided upon 4 equal provincial constituencies and the average population of every and each constituencies is about 370000 and even with 10% addition and omission the population of any constituency at the lowest and bottom is with the figure of population 333000 and the highest figure of population is 407000 but this principle has been violated and deviated very grossly so the constituencies of whole of the District Vehari are liable to be modified and rectified.

IX) That in case of proposal of the petitioner under the present draft / delimitation the principles rules sections and provision were to be preferred while delimitating the whole district of Vehari with the golden principles that the required population was to be taken for the PP-232 and then the next constituency was to be formulated with this principle as well as all the provincial constituencies of District Vehari were to be

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formulated with this golden principle which have not been followed.

X) That as whole the District Vehari along with all four tehsiles is from North to South and this golden principle and rules of delimitation must be followed and preferred for the delimitation, but all the Provincial constituencies of District Vehari are otherwise and opposite, contradictory to the basic principle and about all constituencies of Vehari are from East to West which is the violation of natural existence of population with compactness of areas, existing boundaries, common sources of communication and public convenience thus this the violation of fundamental Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

XI) That on proposal given by the petitioner regarding the delimitation of all the Provincial Constituencies of District Vehari is based upon the strong logic Fundamental Rules, Principles,

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Sections and provisions laid down in the
Delimitation Act and Rules 2017.

PROPOSALS:-

- i) That the Provincial Constituencies of District Vehari be formulated and delimited from North to South with the parity of population compactness of areas common sources of communication public convenience infrastructures.
- j) That the proposed constituencies along with population is enclosed, which is the part of proposal.
- ii) That all constituencies of District Vehari be delimited and formulated according to the proposed map (which is the part of proposal)

PRAYER

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In the circumstances mentioned above it is humbly prayed that all the Provincial Constituencies of District Vehari may kindly be delimited and formulated with the exclusion and inclusion of populations in the light of proposed map of the petitioner along with the proposed populations mentioned in the population distribution/data by the petitioner.

Petitioner in Person
Syed Faheem Hussain Shah
Cell No. 0300-8670417