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BEFORE THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

31/3/2018
Riaz Ahmed

M/An
4/4/18

Delimitation Objection Petition No. _____/2018

- 1- Riaz Ahmed son of Muhammad Ali, Silsla No.756, Gharana No.28, Union Council No.81, Resident of Chak No.111/WB, Tehsil Mailsi, District Vehari.
- 2- Riaz Ahmed son of Muhammad Ashraf, Silsla No.45, Gharana No.15, Union Council No.81, Resident of Chak No.107/WB, Tehsil Mailsi, District Verari.

-----Petitioner

VERSUS

Election Commission of Pakistan through its Secretary, Election Commission of Pakistan Secretariat, Election House, Constitution Avenue, G-5/2, Islamabad.

-----Respondent

OBJECTION PETITION
ON DELIMITATION OF CONSTITUENCIES NA 164 &165 AND
PP 234 & 235 VEHARI

Respectfully Sheweth:

- 1- That brief facts for filing of instant objection petition are that on 05-03-2018, the Election Commission of Pakistan has published delimitations of national and provincial constituencies throughout Pakistan and invited representations/objection petitions from the voters of the constituencies till 03-04-2017.
- 2- That the Election Commission of Pakistan has changed the old delimitation of constituencies and National Halqa/Constituency NA 169 has been replaced with NA164 and Constituency NA 170 has been replaced with NA 165, whereas, the Provincial Constituencies of PP

VERIFICATION:

Verified on oath at Lahore on this 31st day of March, 2018 that the contents of paragraph No.1 to 5 are correct to the best of my knowledge, information and belief and nothing has been concealed there from.

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PETITIONERS

237 has been replaced with PP 234 and PP 238 has been changed with PP 235. Copies of the Map of National Constituencies for Vehari and Map of Provincial Constituencies are attached as ANNEXURES "A & B".

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- 3- That the petitioners are residents of Chak No.111/WB and 107/WB District Vehari (Punjab) respectively and both of the above mentioned villages, along with other 5 Villages i.e.71/WB, 73/WB, 69/WB, 70/WB and Noor Shah, are located within the limits of UC-81 District Vehari. Copies of Map of UC-81 and election list for the year 2012 are attached as ANNEXURES "C & D".
- 4- That now the villages of the petitioners Chak No.111/WB and 107/WB District Vehari (Punjab) has been illegally and unlawfully included within the new limitations of NA 165 & PP235 without any justification whatsoever and the petitioners are aggrieved with the new delimitation of constituencies NA 164, NA-165, PP-234 and PP235 and their villages Chak No.111/WB and Chak No.107/WB District Vehari are liable to be excluded from the delimitation of constituencies NA165 & PP 235 and Chak No.111/WB and Chak No.107/WB District Vehari are liable to be included into the constituencies NA-164 & PP-234 inter alia on the following:

GROUNDS

- A. That the inclusion of Chak No.111/WB and Chak No.107/WB UC-81 district Vehari in NA-165 & PP-235 by bifurcating UC-81, District Vehari is illegal, unlawful, void ab-initio, nullity in the eye of law, without lawful authority and of no legal effect, violative to fundamental rights of the petitioners as guaranteed by the Constitution of Islamic Republic of Pakistan, 1973, in violation of compactness of UC-81, District Vehari and the same is liable to be set aside and modified and the Chak No.111/WB and Chak

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M. Khan
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No.107/WB District Vehari of the petitioners are liable to be included in the constituencies NA-164 & PP-234 so that compactness of UC-81 District Vehari could remain intact.

- B. That the villages of the petitioners i.e. Chak No.111/WB and Chak No.107/WB are located within the limits of UC-81 along with Chak 71/WB, 73/WB, 69/WB, 70/WB and Noor Shah and the inclusion of Chak No.111/WB and Chak No.107/WB district Vehari of the petitioners has practically resulted in tearing of the parts of UC 81 into two different distinct constituencies and if the same is not changed and Chak No.111/WB and Chak No.107/WB District Vehari are not excluded from NA-165 & PP-235 and these village of Chak No.111/WB and Chak No.107/WB District Vehari are not included in NA-164 & PP-234, then voters of UC-81 and the petitioners shall face sever hardships to perform their day to day affairs.
- C. That the old constituency of NA 165 & PP 235 is traditionally situated along the western bank of Sandnaye Canal and towards the eastern side of Sandnaye Canal the villages of the petitioners are located and there is no cogent reason to include the village Chak No.111/WB and Chak No.107/WB District Vehari of the petitioners in the constituencies of NA 165 and PP235 Vehari and it is natural to include the village Chak No.111/WB and Chak No.107/WB of the petitioners in NA 164 and PP234, so that UC-81 Vehari remain intact and in compact block.
- D. That the head office of the UC81 is situated in Chak No.107/WB and the office of the Halqa Patwari and Gardawar is also situated at Chak No.107/WB Vehari and in such a scenario the tearing apart of the villages of UC-81 will not serve any useful purpose and residents of UC-81 Vehari will face great difficulties, hence

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the villages Chak No.111/WB and Chak No.107/WB district Vehari are liable to be excluded from the delimitation of constituencies NA165 & PP 235 and liable to be included into the constituencies NA-164 & PP-234, otherwise the petitioners and other respondents of UC-81, District Vehari shall suffer an irreparable loss and injury.

- 5- That the petitioners have no other remedy except to file the instant objection petition before this commission for the redressal of his grievance.

It is therefore, most respectfully prayed that the instant objection petition may very kindly be accepted and villages Chak No.111/WB and Chak No.107/WB District Vehari may very kindly be excluded from the delimitation of constituencies NA165 & PP235 and these villages of Chak No.111/WB and Chak No.107/WB District Vehari may very kindly be included into the constituencies NA-164 & PP-234, so that UC-81 District Vehari could remain intact as a compact block, in the interest of justice.

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Razki

PETITIONERS

- 1- Riaz Ahmed son of Muhammad Ali, Silsla No.756, Gharana No.28, Union Council No.81, Resident of Chak No.111/WB, Tehsil Mailsi, District Vehari, Phone No.03046083186 – 03017939424.
- 2- Riaz Ahmed son of Muhammad Ashraf, Silsla No.45, Gharana No.15, Union Council No.81, Resident of Chak No.107/WB, Tehsil Mailsi, District Verari.

Through:

Mushtaq Ahmad Mohal
(MUSHTAQ AHMAD MOHAL)
Advocate High Court
4-A Mozang Road, Lahore
Ph: 03334371687

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