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9/03/2019

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

Ghulam Qadir S/o Wali Muhammad R/o Jalli Tarhana,
Tehsil Tandala Wala, District Faisalabad, Cell No. 0333-
3214040.

.....PETITIONER

Vs.

Election commission of Pakistan, Islamabad.

RESPONDENT

**MEMORANDUM/OBJECTION PETITION AGAINST
THE PRELIMINARY DELIMITATION / DRAFT OF
CONSTITUENCIES NO. NA-103 TO NA-105
DISTRICT FAISALABAD PROVINCE PUNAB
PUBLISHED BY THE ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD**

Respected Sheweth,

1. That the petitioner is resident of Jalli Tarhana, Tehsil Tandala Wala, District Faisalabad and is enrolled voter to constituency No. NA-104 Faisalabad at Sr. No. 415 in Census Code No. 151011001 in Circle No. Jalli Tarhana, Tehsil Tandlawala, District Faisalabad (Copy of vote certificate is attached Annexure-A.

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2. That the Election Commission of Pakistan has published the preliminary delimitation / draft of all constituencies of District Faisalabad through a Public Notice (Copy is attached herewith as Annexure-B).
3. That the delimitation of constituencies NA-103 to NA-105 District Faisalabad formulated by the Election Commission of Pakistan is just the violation of all the principles, Rules, Sections and provisions laid down by 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. NA-103 to NA-105 District Faisalabad 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:-

GROUND

- I) That the District Faisalabad consisting upon 6 Rural and 4 Urban National Constituencies of Province Punjab bearing Constituency No. NA-

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101 TO NA-106 District Faisalabad and the petitioner as well as other effectees belong to the rural national constituencies of District Faisalabad.

- II) That as the population has been increased so it is impossible to keep all the constituencies within its Tehsil boundaries.
- III) That the existing boundaries of District Faisalabad as well as its 3 Tehsils are from North to South naturally which can be perused in the map of Faisalabad. (Copy of map is attached).
- IV) That the petitioner is resident of Tehsil Tandlian Wala and from the very beginning, he is the voter member of the said Tehsil historically but now after delimitation, the petitioner as well as other effectees have been transferred from Tehsil Tandlian Wala to Tehsil Sumandri which is far away about 60 KM and the same has created inconvenience not only to the petitioner but also other residents of the locality and the said act is

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against the Law Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

V) That it is to be noted that the area which has been effected by this delimitation is more than 10 % of the previous delimitation which was already in the prevailing jurisdiction of previous constituency.

VI) That presently in the preliminary Delimitation / draft if we travel in the same National constituency the residents of the locality have to cross several national 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.

VII) That draft of all the national 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 rectified under the proposal of the petitioner.

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VIII) That as whole the District Faisalabad is from North to South and this golden principle and rules of delimitation must be followed and preferred for the delimitation, but all the National constituencies of District Faisalabad are otherwise and opposite, contradictory to the basic principle and about all constituencies of Faisalabad 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 is the violation of fundamental Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

IX) That on proposal given by the petitioner regarding the delimitation of all the National Constituencies of District Faisalabad is based upon the strong logic Fundamental Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

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PROPOSALS:-

- i. That the National Constituencies of District Faisalabad be formulated and delimited from North to South with the parity of population compactness of areas common sources of communication public convenience and infrastructures.
- ii. That the proposed constituencies along with population is enclosed, which is the part of proposal.
- iii. That the constituencies of District Faisalabad i.e. NA-103, NA-104 and NA-105 be delimited and formulated according to the proposed map (which is the part of proposal).

NA-103

Primary constituency	Proposed constituency
a. The following QHs of Jaranwala Tehsil. 1. Satiana	a. The following QHs of the Jaranwala Tehsil 1. Rodala 2. The following PCs of

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2. Rodala 3. The Following Patwar Circles of Awagat QH i. 006GB ii. 069GB iii. 113GB b. Kanian QH of Sumandri Tehsil 1. Mamunkanjan 2. Killianwala 3. The following PCs of Garh QHS i. 456GB ii. Sheraza iii. Shadi iv. Garh v. 619-GB 4. Mamonkanjan MC Total 790908	Satiana QHs i. 027-GB ii. 034-GB iii. 037-GB b. Tehsil Tandalianwala excluding the following QHs 1. The following PCs of QH Mamonkajan. i. 491-GB ii. 492GB iii. 507-GB iv. 510-GB 2. Mamonkanjan MC Total 783189
Total 790908	Total 783189

NA-104

Primary constituency	Proposed constituency
a. The following QHs of Tandlian Wala Tehsil. 1. Mamunkanjan 2. Killian Wala 3. The Following Patwar Circles of Garh QH i. 456GB ii. Sheraza iii. Shadi iv. Garh v. 619-GB b. Mamonkanjan MC c. Sumandri Tehsil excluding the following QHs 1. Kanian	a. The following QHs of Tandlian Wala Tehsil. 1. The following PCs of Mamunkanjan QH i. 491-GB ii. 492-GB iii. 507-GB iv. 510-GB 2. Mamonkanjan MC b. Sumandri Tehsil including MC Sumandri c. The following PCs of QH Satiana of Tehsil Jaranwalai

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2. Saluni Jhal	i. 039-GB
3. The following PCs Giddar Pindi QHs	ii. 040-GB
i. 46-GB	d. The following PCs of QH Dajkot, Tehsil Saddar, Faisalabad
ii. 47-GB	i. 268-GB
iii. 48-GB	ii. 659-GB
Total 760715	Total 789339

NA-105

Primary constituency	Proposed constituency
<p>a. The following QHs of Sumandri Tehsil.</p> <p>1. Saluni Jhal</p> <p>2. The following PCs Giddar Pindi QHs</p> <p>i. 46-GB</p> <p>ii. 47-GB</p> <p>iii. 48-GB</p> <p>b. The Following QHs of Faisalabad, Saddar Tehsil</p> <p>1. Dijkot</p> <p>2. Sarshamir</p> <p>3. Saddar-I</p> <p>4. Saddar-II</p> <p>c. Dijkot MC</p> <p>d. The following census charges of Faisalabad MC</p> <p>i. Charge No. 49</p> <p>ii. Charge No. 50</p>	<p>a. The following QHs of Tehsil Saddar, Faisalabad.</p> <p>1. Sirshamir</p> <p>2. Saddar-I</p> <p>3. Saddar-II</p> <p>4. QH Dijkot excluding following PCs</p> <p>i. 268-GB</p> <p>ii. 659-GB</p> <p>5. Dijkot MC</p> <p>b. The following QHs of Tehsil Jaranwala</p> <p>1. The following PCs of QH Satiana</p> <p>i. 033-GB</p> <p>ii. 072-GB</p> <p>iii. 073-GB</p> <p>iv. 089-GB</p> <p>v. 116-GB</p> <p>vi. 118-GB</p> <p>2. The following PCs of QH Awagat</p> <p>i. 066-GB</p> <p>ii. 069-GB</p>


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		iii. 113-GB	
		c. The following census charges of Faisalabad MC	
		i. Charge No. 49	
		ii. Charge No. 50	
Total	809773	Total	788868

PRAYER

In the circumstances mentioned above it is humbly prayed that all the National Constituencies of District Faisalabad 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 in the best interest of the public of the area.


PETITIONER
0333-3214040

Through

MUHAMMAD ASHFAQ SHAHID
Advocate High Court
Cell No. 0333-5605503