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BEFORE THE WORTHY SECRETARY ELECTION
COMMISSION OF PAKISTAN, ISLAMABAD

Muhammad Yasir Saleem S/o Muhammad Saleem R/o
Chak No. 173-GB, Bhudana, P.O Tandala Wala Tehsil
Sumandari, District Faisalabad.

...PETITIONER

Vs.

Election commission of Pakistan, Islamabad.

RESPONDENT

MEMORANDUM/OBJECTION PETITION AGAINST
THE PRELIMINARY DELIMITATION / DRAFT OF
CONSTITUENCIES NO. NA-103 TO NA-104
DISTRICT FAISALABAD PROVINCE PUNAB
PUBLISHED BY THE ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD

Respected Sheweth,

1. That the petitioner is resident of Chak No. 173-GB,
Bhudana, P.O Tandala Wala Tehsil Sumandari,
District Faisalabad and is enrolled voter to
constituency No. NA-103 Faisalabad.

2. That the Election Commission of Pakistan has published the preliminary delimitation / draft of all constituencies of District Faisalabad through a Public Notice.
3. That the delimitation of constituencies NA-103 to NA-104 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-A.
4. That as per new delimitation the Kanian QH of Tehsil Sumandri comprising of population 79109 and the following Chaks having part of Kanian QH are very near to Tehsil Sumandri and this same has been transferred to NA-103 of Tehsil Tandlian Wala whereas the following PCs (Mouza Garah, 456-GB, Sheraza, Shadi, 619-GB) of ½ of Garah QH and its population is 63896, these PCs of Garah QH have been transferred to NA-104 and this shifted area is the part of Tehsil Tandlian Wala and very near to Tehsil Tandlian Wala. It is therefore, proposed that if QH Kanian of Tehsil Sumandri is

returned back to NA-104 instead of NA-103 and the above named five PCs of QH Garah are returned to NA-103 instead of NA-104, the whole scenario will be compact and very convenience to every voter of both the constituencies and this very proposal has already been mentioned in the proposed map submitted by the petitioner and as per rules of the delimitation given by the respondent, the portion of the population will be very friendly to everyone and the voters will be very closed to their respective constituencies and nobody will be effected from the proposal plan.

5. That the preliminary delimitation of constituency No. NA-103 to NA-104 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 as the population has been increased so it is impossible to keep all the constituencies with in its Tehsil boundaries.

- II) 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).
- III) That the petitioner is resident of Chak No. 173-GB, Bhudana, P.O Tandala Wala Tehsil Sumandari, District Faisalabad 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 against the Law Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.
- IV) 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.

- V) 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.
- VI) 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.
- VII) 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.

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 and NA-104 be delimited and formulated according to the proposed map (which is the part of proposal).

NA-103

| Primary constituency | Proposed constituency |
|---|---|
| <p>a. The following QHs of Jaranwala Tehsil.</p> <ol style="list-style-type: none"> 1. Satiana 2. Rodala 3. The Following Patwar Circles of Awagat QH <ol style="list-style-type: none"> i. 006GB ii. 069GB iii. 113GB b. Kanian QH of Sumandri Tehsil <ol style="list-style-type: none"> 1. Mamunkanjan 2. Killianwala 3. The following PCs of Garh QHS <ol style="list-style-type: none"> i. 456GB ii. Sheraza iii. Shadi iv. Garh v. 619-GB 4. Mamonkanjan MC | <p>a. The following QHs of Jaranwala Tehsil.</p> <ol style="list-style-type: none"> 5. Satiana 6. Rodala 7. The Following Patwar Circles of Awagat QH <ol style="list-style-type: none"> iv. 006GB v. 069GB vi. 113GB b. Tehsil Tandalianwala excluding the following QHs <ol style="list-style-type: none"> i. Mamonkajan QH. ii. Kalianwala iii. Mamonkanjan MC |
| Total 790908 | Total 775696 |

NA-104

| Primary constituency | Proposed constituency |
|---|---|
| <p>a. The following QHs of Tandlian Wala Tehsil.</p> <ol style="list-style-type: none"> 1. Mamunkanjan 2. Killian Wala 3. The Following Patwar Circles of Garh QH <ol style="list-style-type: none"> i. 456GB ii. Sheraza | <p>a. The following QHs of Tandlian Wala Tehsil.</p> <ol style="list-style-type: none"> 1. Mamunkanjan QH 2. Kilian Wala QH 3. Mamunkanjan MC <p>b. Tehsil Sumandri exluding the following QHs</p> <ol style="list-style-type: none"> 1. Saloni Jal 2. following PCs of Giddar |

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| | |
|---|---|
| iii. Shadi iv. Garh v. 619-GB b. Mamonkanjan MC c. Sumandri Tehsil excluding the following QHs 1. Kanian 2. Saluni Jhal 3. The following PCs Giddar Pindi QHs i. 46-GB ii. 47-GB iii. 48-GB | Pindi QH i. 46-GB ii. 47-GB iii. 48-GB |
| Total 760715 | Total 775928 |

PRAYER

In the circumstances mentioned above it is humbly prayed that all the National Constituencies of District Faisalabad NA-103 & 104 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.

Through

PETITIONER

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 Advocate High Court
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