

Before the Honorable Election Commission of Pakistan,
Islamabad

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Jw
4-4-17

Ali Abbas Khan S/O Muhammad Fazal Khan resident of
207 RB (Gujar Khan Wala) Mansoorabad Faisalabad.

Objection Petitioner.

VERSUS

ELECTION COMMISSION OF PAKISTAN.

.....Respondent.

**Objections/memorandum under section 21 of
Elections Act 2017 and rule no. 11 of election
Rules 2017 read with all enabling provisions of
Elections Act and Rules.**

**Provincial constituency No. PP 112 District
Faisalabad Punjab.**

RESPECTFULLY SHEWETH:

1. The petitioner is resident of mentioned address and as per voter list 2012 holds vote no, 393 Gharana NO. 154 and as per information against query in response to message sent on 8300 to verify vote form election commission of Pakistan petitioner holds Shumariati Block Code 149230502 Silsila NO. 74 having CNIC No. 33100-0979922-5 falling in constituency PP-112 district Faisalabad and is also a candidate for said constituency holds right to file objection/memorandum against delimitations published by respondent.
2. That election commission of PAKISTAN has published preliminary delimitation of constituencies and has uploaded on the web site www.ecp.gov.pk and

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petitioner/objection petitioner is aggrieved of delimitation of provincial constituency no. PP-112 District Faisalabad.

3. That as per preliminary delimitation of PP- 112, it comprises following details.

Total No. of votes: **3,90,136**

Total No. of U.C. **18**

Total No. of Charge: **07 i.e 23,25, 27,28,29, 30,32**

Patwar Circle: **Chak No. 198 R.B Gatt Wala Sadar Faisalabad.**

4. That petitioner is aggrieved of the impugned preliminary delimitation of PP-112 District Faisalabad on the following amongst grounds.

- a. That adjacent constituency of the PP-112 is PP-117 and constituency PP-117 consists following details.

Total No. of votes: **3,91,388**

Total No. of U.C. **20**

Total No. of Charge: **12 i.e 05,13,14, 15, 16, 24, 26, 63, 64, 65, 66, 67**

and as per site plan of delimitation, charge No. 26 consisting upon union councils NO. 49, 50 and U.C 48 half has been wrongly included in constituency of PP-117 against ground reality and is equitably and rationally deserves to be included in constituency of PP-112.

- b. That charge no. 26 is purely and rationally out of approach through any kind of metted road on the ground that charge no. 26 is separated through Main railway line leading towards Lahore, Sangla and Rawalpindi and even there is no possibility of pedestrian approach of constituency of the people of locality of charge no. 26 in PP-117.

- c. That even otherwise previously constituency PP-112 was in shape of a compact block including charge no. 26 and said compact block was made keeping in view the convenience of the public of the locality of charge no. 26 and most of the people has also links and relations with the people of PP-112, hence preliminary delimitation of constituency of PP-117 is not justified as per aforesaid ground reality and location of the charge no. 26.

- d. That previously delimitation of PP-117 and PP-112 was made on the basis of above said compact block i.e partitioned through main railway line and said

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delimitation was made keeping in view the interest of the people of the locality and political affiliation of the people of the locality of charge no. 26 since long but in impugned preliminary delimitation railway line has been crossed and charge no. 26 previously falls in PP-112 has been segregated from compact block of Mansoor abad and without any rhyme or reason has now been included in PP-117 which is even otherwise against the logic of prudence of an ordinary prudent man.

- e. That total no. of union councils are 18 in PP-112, whereas total no. of union councils in PP-117 are 20 which is also not justified at all and if charge no. 26 is included in PP-112 total no. of union councils will be 20 in number and inclusion of charge no. 26 shall formulate in shape of one compact block commonly known as Manoor Abad.
- f. That in case of inclusion of charge no. 26 total no. of votes will not be disturbed materially and in the large interest of justice, equity, fair play and convenience of the public of charge no. 26 ought have to be included in constituency of PP-112.
- g. That people of charge no. 26 has die heart and old standing affiliation with the constituency of people of PP-112 and in connection with solution of their problems and in order to make their representation though representative of PP-112, people of charge no. 26 always feel comfortable to remain part of previously delimitation of constituency of PP-112, hence, restoration of charge no. 26 in delimitation in constituency of PP-112 is justified rather requirement of ground reality also.
- h. That if charge no. 26 is not included in constituency of PP-112, petitioner and public at large of charge no. 26 shall suffer an irreparable loss and injury and even the facts and circumstances stated above also demand the inclusion of charge no. 26 in constituency of PP-112.

In the light of submissions made above it is most respectfully prayed that objections/memorandum of the petitioner may very kindly be accepted and preliminary delimitation of constituency PP-112 may very kindly be amended/modified by inclusion of

charge no. 26 in PP-112 District Faisalabad in the large interest of justice, equity and fair play.

Any other appropriate modification/change in delimitation just for convenience of the constituency PP-112 may kindly be ordered.



Petitioner.

Ali Abbas Khan S/O Muhammad Fazal Khan resident of 207 RB (Gujar Khan Wala) Mansoorabad Faisalabad

As per voter list 2012

Vote no, 393

Gharana NO. 154

Constituency PP-112 Faisalabad.

As per message sent on 8300

**Verification of vote form election commission of Pakistan
Shumariati Block Code 149230502**

Silsila NO. 74

CNIC No. 33100-0979922-5

Constituency PP-112

District Faisalabad

Candidate for constituency PP-112.

Contact No. 0347-9999999

 

**Before the Honorable Election Commission of Pakistan,
Islamabad.**

Ali Abbas Khan **VERSUS** E.C.P.

AFFIDAVIT.

I, **Ali Abbas Khan** S/O Muhammad Fazal Khan resident of 207 RB (Gujar Khan Wala) Mansoorabad Faisalabad do hereby solemnly affirm and declare as under,

1. The petitioner is resident of mentioned address and as per voter list 2012 holds vote no, 393 Gharana NO. 154 and as per information against query in response to message sent on 8300 to verify vote form election commission of Pakistan petitioner holds Shumariati Block Code 149230502 Silsila NO. 74 having CNIC No. 33100-0979922-5 falling in constituency PP-112 district Faisalabad and is also a candidate for said constituency holds right to file objection/memorandum against delimitations published by respondent.
2. That election commission of PAKISTAN has published preliminary delimitation of constituencies and has uploaded on the web site www.ecp.gov.pk and petitioner/objection petitioner is aggrieved of delimitation of provincial constituency no. PP-112 District Faisalabad.
3. That as per preliminary delimitation of PP- 112, it comprises following details.

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4. That petitioner is aggrieved of the impugned preliminary delimitation of PP-112 District Faisalabad on the following amongst grounds.
 - a. That adjacent constituency of the PP-112 is PP-117 and constituency PP-117 consists following details.

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and as per site plan of delimitation, charge No. 26 consisting upon union councils NO. 49, 50 and U.C 48 half has been wrongly included in constituency of PP-117 against ground reality and is equitably and rationally deserves to be included in constituency of PP-112.

- b.** That charge no. 26 is purely and rationally out of approach through any kind of metalled road on the ground that charge no. 26 is separated through Main railway line leading towards Lahore, Sangla and Rawalpindi and even there is no possibility of pedestrian approach of constituency of the people of locality of charge no. 26 in PP-117.
- c.** That even otherwise previously constituency PP-112 was in shape of a compact block including charge no. 26 and said compact block was made keeping in view the convenience of the public of the locality of charge no. 26 and most of the people has also links and relations with the people of PP-112, hence preliminary delimitation of constituency of PP-117 is not justified as per aforesaid ground reality and location of the charge no. 26.
- d.** That previously delimitation of PP-117 and PP-112 was made on the basis of above said compact block i.e partitioned through main railway line and said delimitation was made keeping in view the interest of the people of the locality and political affiliation of the people of the locality of charge no. 26 since long but in impugned preliminary delimitation railway line has been crossed and charge no. 26 previously falls in PP-112 has been segregated from compact block of Mansoor abad and without any rhyme or reason has now been included in PP-117 which is even otherwise against the logic of prudence of an ordinary prudent man.
- e.** That total no. of union councils are 18 in PP-112, whereas total no. of union councils in PP-117 are 20 which is also not justified at all and if charge no. 26 is included in PP-112 total no. of union councils will be 20 in number and inclusion of charge no. 26 shall

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formulate in shape of one compact block commonly known as Manoor Abad.

- f. That in case of inclusion of charge no. 26 total no. of votes will not be disturbed materially and in the large interest of justice, equity, fair play and convenience of the public of charge no. 26 ought have to be included in constituency of PP-112.
- g. That people of charge no. 26 has die heart and old standing affiliation with the constituency of people of PP-112 and in connection with solution of their problems and in order to make their representation though representative of PP-112, people of charge no. 26 always feel comfortable to remain part of previously delimitation of constituency of PP-112, hence, restoration of charge no. 26 in delimitation in constituency of PP-112 is justified rather requirement of ground reality also.
- h. That if charge no. 26 is not included in constituency of PP-112, petitioner and public at large of charge no. 26 shall suffer an irreparable loss and injury and even the facts and circumstances stated above also demand the inclusion of charge no. 26 in constituency of PP-112.

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DEPONENT.

VERIFICATION.

Verified upon oath at Faisalabad at this day of 02 April 2018 that contents of affidavit are true and to the best of my knowledge and belief and nothing has been concealed therefrom.

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DEPONENT.