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

A/27/03/2018
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ELECTION PETITION NO. _____/2018

KHURSHID AHMAD KHAN son of Ghulam Sarwar Khan, Caste Baloch Chandia, resident of Rehman Colony, Khan Pur, CNIC # 3101-6222634-3, Cell # 0300-6718153.

APPELLANT

VERSUS

ELECTION COMMISSION OF PAKISTAN, Islamabad.

RESPONDENT

* * *

OBJECTION PETITION:

REGARDING THE CONSTITUENCY NO.NA-176, DISTRICT RAHIM YAR KHAN-II FOR EXCLUSION OF AREA ABASIA-I & II FROM CONSTITUENCY NA-176, RAHIM YAR KHAN-II AND INCLUSION OF Q.Hs PAKKA LARAN ALONGWITH TWO P.Cs ASHRAF SHAH AND TARANDA MEER KHAN IN NA-176, RAHIM YAR KHAN-II AND ITS EXCLUSION FROM NA-175, RAHIM YAR KHAN-I.

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RESPECTFULLY SHEWETH:-

1. That the petitioner is enrolled as a voter in the Constituency No.NA-176 Rahim Yar Khan-II.
2. That the preliminary delimitation of constituencies has been published through public notice by the respondent. Copy of Notice is attached as ANNEX-A.
3. That the preliminary delimitation of Constituency No.NA-176, Rahim Yar Khan-II is against the law, facts, rules, procedure, principles and provisions as well as Sections laid down in the Delimitation Act 2017.
4. That there is gross violation of laws, rules, principles and Sections of Delimitation Rules 2017.
5. That the delimitation of NA-176 alongwith NA-175 Rahim Yar Khan-I is liable to be rectified to the extent of prayer of the petitioner to meet the ends of justice and to be in accordance with the rules, provisions, laws,

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sections laid down in the Delimitation Act 2017.

6. That the population of Abasia-I & II has been included in NA-176, Rahim Yar Khan-II against the facts rules, provisions and golden principles of Election Rules 2017 which is liable to be excluded from NA-176 Rahim Yar Khan-II and is liable to be included in NA-175, Rahim Yar Khan-I as well as Q.Hs, Pakka Laran alongwith two P.Cs Ashraf Shah and Taranda Meer Khan are liable to be excluded from NA-175 Rahim Yar Khan-I and to be included in NA-176 Rahim Yar Khan-II on the following:-

GROUND S

- a) That the population of Abasia-I & II is most close and Geographically compact areas having physical features with existing boundaries and Administration Units facilities of communications as well as public convenience with the constituency No.NA-175 Rahim Yar Khan-I the Map, the reports of Chief Officer Municipal Committee, Liaqatpur and the reports of revenue officer Liaqatpur are attached herewith as ANNEX-

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B. C & D.

- b) That the most of area of population consisted upon Abasia-I and II is a part and partial and most close and nearest to the Municipal Committee Liaqatpur and Abasia is the suburb area of Municipal Committee Liaqatpur as well as Tehsil Headquarter, Liaqatpur which is visible in the Map (Annex-B).
- c) That the population of Abasia-I & II is physically attached and adjacent and administratively a Unit of Municipal Committee, Liaqatpur as well as Tehsil Headquarter, Liaqatpur. Particularly, the area of Chak No.17-A, 18-A, 19-A, 20-A, 5-A, 14-A, Urban area is included in Ward Nos.8, 16, 17, 18 and 19 of Municipal Committee, Liaqatpur.
- d) That the most of the population of Abasia-I & II is very near very close to the Municipal Committee Liaqatpur as well as Tehsil Headquarter Liaqatpur being a close administrative unit having its Roads, Institutions, Health Units as well as common

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sources of communication alongwith other business units and business centres which are most close and nearest to NA-175 Rahim Yar Khan-I, whereas, it has been included in NA-176, Rahim Yar Khan-II with consist upon the whole and total Municipal Committee Khan Pur as well as Tehsil Headquarter, Khanpur and thus the inter-se distance and difference in between the both Tehsil Headquarters i.e Tehsil Liaqat Pur and Khan Pur is more than 50 Kilometers and it is the gross violation of Geographically compactness of areas physical featurness existing boundaries administrative Units, facilities of communications, public convenience and as well as parity of population.

- e) That in the present form and shape of NA-176, Rahim Yar Khan-II is consisted upon a huge distance of about 92.5 Kilometers from Abasia-I and II as well as Tehsil Headquarter Liaqatpur. Meaning thereby that the Constituency No.NA-176 is formulated from East to West consisting upon a huge

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distance and this delimitation is against the fundamental rules, principles, laws laid down in the guidelines of Delimitation Act 2017.

- f) That the existence and shape of Tehsil boundaries of District Rahim Yar Khan are from North to South and its all sources of communications as well as administrative units from North to South which is just natural and feasible but unfortunately, the present shape and form of preliminary delimitation of NA-176, Rahim Yar Khan-II is from East to West which is a gross violation of fundamental principle, golden rules, provisions and laws of the Delimitation Act 2017.
- g) That there is not parity of population in both the constituencies i.e the population of NA-175 Rahim Yar Khan-I is 834642, whereas, the population of NA-176 Rahim Yar Khan-II is 765764 which is more than 68878.
- h) That the population of Abasia-I & II is 112686 which in case of exclusion of this

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population of Abasia from NA-176, Rahim Yar Khan-II and its inclusion in NA-175 Rahim Yar Khan-I alongwith exclusion of population of Q.Hs, Pakka Laran alongwith two P.Cs Ashraf Shah and Taranda Meer Khan and its inclusion into NA-176 Rahim Yar Khan-II the shape of both the constituencies i.e 175 Rahim Yar Khan-I and NA-176 Rahim Yar Khan-II becomes very ideal in all respectives of parity of population, geographically compactness of areas, physical featurness existing boundaries and administrative units alongwith the other facilities of communications and public convenience.

PROPOSAL

- i) That the population of Abasia-I & II may be excluded from NA-176 Rahim Yar Khan-II and be included in NA-175 Rahim Yar Khan-I as well as the population of Q.Hs, Pakka Laran alongwith two P.Cs Ashraf Shah and

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Taranda Meer Khan be excluded from NA-175 Rahim Yar Khan-I and be included in NA-176 Rahim Yar Khan-II.

ii) **The proposed Constituency No.175 Rahim Yar Khan-I:**

Total Population	834642
Exclusion of QHs, Pakka Laran	- 128447

Exclusion Ashraf Shah & T.M. Khan	706195
	-25439

Inclusion of Abasia-I	680756
	+ 56126

Inclusion of Abasia-II	736882
	+ 56560

	793422

ii) **Proposed Constituency No.NA-176 Rahim Yar Khan-II**

Total Population	765764
Exclusion of Abasia-I	- 56126

Exclusion of Abasia-II	7096.38
	- 56560

Inclusion Pakka Laran	653078
	+ 128447

Inclusion of Ashraf Shah and T.M. Khan.	781525
	+ 25439

	806964

iii. That the remaining all constituencies of District Rahim Yar Khan are not questioned.

PRAYER:


In the circumstances, it is humbly prayed that by accepting this objection petition population


to:-

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of Abasia-I & II may kindly be excluded from NA-176
Rahim Yar Khan-II and may kindly be included in
NA-175 Rahim Yar Khan-I and the population of QHs
Pakka Laran alongwith two P.Cs Ashraf Shah and
Taranda Meer Khan may kindly be excluded from
NA-175 Rahim Yar Khan-I and may kindly be
included in N.A-176 Rahim Yar Khan-II.

Any other appropriate relief which this
Honourable Court deems fit and proper in the
circumstances of the case may also be awarded.


PETITIONER IN PERSON


KHURSHID AHMAD KHAN CHANDIA
Advocate High Court,
Seat at Khan Pur,
District Rahim Yar Khan.
CNIC # 31301-6222634-3.
Cell # 0300-6718153

Dated: 20.03.2018

(CNDIA-2010/MARCH/18)

CERTIFICATE:

Certified as per instruction that this is the
first Election Petition on the subject in this
Honourable Court.


ADVOCATE