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**MEMORANDUM IN REGARD OF DISTRICT**  
**RAHIM YAR KHAN**  
**BEFORE THE WORTHY SECRETARY**  
**ELECTION COMMISSION OF PAKISTAN,**  
**ISLAMABAD.**

Raja Muhammad Saleem S/O Raja Muhammad Amin Caste Rajput,  
resident of Street No. 1, New Akhtar Abad, Khanpur, District Rahim  
Yar Khan. CNIC No. 31302-0988785-5. Cell No. 0300-6742779.

.....Petitioner

Versus

Election Commission of Pakistan, Islamabad.

**OBJECTION PETITION REGARDING CONSTITUENCY**  
**NO. NA-176 RAHIM YAR KHAN-II FOR INCLUSION PCs**  
**CHAK NO. 5-ABBASIA, CHAK NO. 50 ABBASIA OF QHs,**  
**TRUKRAI & PCs CHOHR WALA OF QHs PAKKA**  
**LARAN, DISTRICT RAHIM YAR KHAN AND ITS**  
**EXCLUSION FROM CONSTITUENCY NO. 175 RAHIM**  
**YAR KHAN-I**

Respected Sheweth,

1. That the petitioner is resident of Street No. 1, New Akhtar Abad, Khanpur, District Rahim Yar Khan and is enrolled voter to constituency No. NA-176 Rahim Yar Khan -II at Sr. No. 55 Gharana No. 22, in Census Code

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No. 251110502 in Akhtar Abad, District Rahim Yar Khan (Copy of vote certificate is attached Annexure-A.

2. That the Election Commission of Pakistan has published the preliminary delimitation of all constituencies of Rahim Yar Khan through a Public Notice (Copy is attached herewith as Annexure-B
3. That the delimitation of NA-176 Rahim Yar Khan-II formulated by the Election Commission of Pakistan is just the violation of all the principles, Rules, Sections and provisions laid down in the Delimitation Act 2017. The map of preliminary delimitation of all constituencies is attached herewith as Annexure-C.
4. 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 and is liable to be rectified with the exclusion of population of PCs Chak No. 5-Abbasia and Chak No. 50-Abbasia of QHs Trukri along with the exclusion of PCs Choharwala QHs Pakka Laran District Rahim Yar Khan from NA-175 Rahim Yar Khan-I and its inclusion into NA-176 Rahim Yar Khan-II on the following:-

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## GROUNDS

- I) That the population of Constituency No. NA-176 Rahim Yar Khan-II is 765764 whereas the Population of Constituency No. NA-175 Rahim Yar Khan-I is 834642. Meaning thereby that there is the difference of a huge population of 68878 which is against the rule of parity of population.
- II) That the PCs mentioned above i.e. PCs Chak No. 5 Abbasia and Chak No. 50 Abbasia of QHs Trukari are most close and suburb area of QHs Abbasia I & II whereas PCs Chohar Wala of QHs Pakka Laran District Rahim Yar Khan is the part and partial of NA-176 Rahim Yar Khan-II, but unfortunately the PCs Chask No. 5-Abbasia and Chak No. 50 Abbasia of QHs Trukari and PCs Chohar Wala of QHs Pakka Laran District Rahim Yar Khan have not been included in NA-176 Rahim Yar Khan-II. Whereas it have been included in NA-175 Rahim Yar Khan-I which is against the spirit, nature, Laws, Rules, provisions and sections of Delimitation Act 2017.

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III) That the preliminary delimitation of NA-176 Rahim Yar Khan-II is to be rectified and to be formulated in accordance with the rules, laws, principles and sections laid down in Delimitation Act 2017.

IV) That in case of inclusion of PCs Chak No. 5-Abbasia and Chak No.50-Abbasia along with PCs Chohar Wala, the population of both the constituencies i.e. NA-175 Rahim Yar Khan-I and NA-176 Rahim Yar Khan -II becomes very ideal and in accordance with the fundamental rules, principals, sections, provisions and particularly the parity of population under the Delimitation Act 2017 and all the communication facilities sources compactness of the areas as well as public convenience along with other cognat affiliations homogeneity the proposed areas are the part and partial of NA-176 Rahim Yar Khan-II and the present shape i.e. preliminary delimitation is the violence and deviations of all Rules, Laws, Section, Provisions and golden principles.

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V) That PCs Chak No. 5-Abbasia consist upon Chak No. 5-A, Chak No. 12-A, Chak No. 13-A, Chak No. 13-A, Chak No. 14-A, Chak No. 16-A, Chak No. 17-A, Chak No. 25-A, is about 14287 as well as the population of PCs Chak No.50 Abbasia consisting upon Chak No. 26-A, Chak No. 27-A, Chak No. 28-A, Chak No. 46-A, Chak No. 47-A, Chak No. 48-A, Chak No. 49-A, Chak No. 50-A, Chak No. 58-A, Chak No. 59-A, Chak No. 60-A, Chak No. 61-A, Chak No. 62-A, is about 10042 as well the population of PCs Chohar wala consisting upon Mouzas, Chohar wala, Hayat Lar, Rashid Abad, is about 21348 which is into total 45677 and is liable to be included in NA-176 Rahim Yar Khan-II while to be excluded from NA-175 Rahim Yar Khan-I.

VI) That the major portion of population consisting of the PCs Chohar Wala particularly Mouza Hayat Lar as well as Chohar Wala consisting of the Feroza City as well as Railway Station, Govt. Higher Secondary School for Girls, Govt. Higher Secondary School for Boys, RHC Feroza,

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Veterinary Hospital Feroza is already included in constituency No. NA-176 Rahim Yar Khan-II and unfortunately both the mouzas have been separated and excluded halfly from there Headquarter Feroza and Mouzas can't be divided and separated under the Rules, Laws, Provisions and sections laid down Delimitation Act 2017. (Copy of report of Tehsildar/Revenue officer Khanpur is attached herewith as Annexure-D).

VII) That the population of both the constituencies after the inclusion of PCs Chak No. 5-Abbasia and Chak No. 50-Abbasia of QHs Trukri as well as the inclusion of PCs Choharwala of QHs of Pakka Laran in NA-176 Rahim Yar Khan-II, while its exclusion from NA-175 Rahim Yar Khan-I the population of both the constituencies becomes in accordance with the principles of parity of population, Rules, Laws, provisions, sections laid down in Delimitation Act 2017 and the shape of both the constituencies is as under:-

**I) NA-175 Rahim Yar Khan-I**

**a) Total Population**

**834642**

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**b) Population of PCs**

**Chak No. 5-Abbasia as purposed -14287**

**Chak No. 50-Abbasia as purposed -10042**

**PCs Chohar Wala as purposed -21348**

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**788965**

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**II) NA-176 Rahim Yar Khan-II**

**Total Population 765764**

**b) Population of PCs**

**Chak No. 5-Abbasia as purposed +14287**

**Chak No. 50-Abbasia as purposed+10042**

**PCs Chohar Wala as purposed +21348**

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**811441**

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VIII) That QHs Abbasia I & II have already been a part and parcel of NA-176 Rahim Yar Khan in are respective of compactness of areas existing boundaries, common sources of communication and public convenience, so the PCs Chak No. 5-Abbasia AND Chak No. 50Abbasia of QHs Trukri can't be separated as excluded from NA176

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Rahim Yar Khan-II which are the part and partial of QHs Abbsia I & II.

- IX) That the proposed delimitation with exclusion and inclusion of population mentioned above is in accordance with the rules laws, sections, provisions and golden principles laid down in the Delimitation Act 2017.

**PROPOSALS:-**

- i) That the population of PCs Chak No. 5-Abbais and Chak No. 50-Abbasia of QHs Trukri Tehsil Liaquatpur be excluded from NA-175 Rahim Yar Khan-I.
- ii) The population of PCs Chohar Wala of QHs Pakka Laran be excluded from NA 175-Rahim Yar Khan-I.
- iii) The population of PCs Chak No. 5-Abbasia, Chak No. 50-Abbasia of QHs Trukri and the population of PCs Choharwala of QHs Pakka Laran be included in NA-176 Rahim Yar Khan-II.
- iv) That the remaining constituencies of whole district are not in question and not



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to be rectified with the proposal of petitioner, as those constituencies are intact with respect to the Principles as laid down in the laws.

**PRAYER**

In the circumstances mentioned above it is humbly prayed that the areas and population of PCs Chak No. 5 Abbasia, Chak No. 50 Abbasia of QHs Trukri and PCs Chohar Wala of QHs Pakka Laran may kindly be excluded from Constituency No. NA-175 Rahim Yar Khan-I and may kindly be included in Constituency No. NA-176 Rahim Yar Khan-II, so that the spirit of law could be ascertain and will become in the best interest of public and justice.

  
**RAJA MUHAMMAD SALEEM**  
Petitioner.

Through: Agent  
Counsel:

  
**KHURSHID AHMAD KHAN CHANDIA**  
Advocate High Court.