

To,

Worthy Secretary Election Commission Of Pakistan,  
Islamabad

Subject: PRESENTATION OF THE OBJECTION PETITION.

Respectfully Sheweth:

1. That the synopsis of the instant petition is <sup>That petitioner is</sup> the citizen of Pakistan and resident of Chak No. 314/TDA, Tehsil Chobara District Layyah and also the registered voter in the NA-187 of Tehsil Chobara District Layyah. Attested Voter number of petitioner is as Annex A. NIC as Annex A/1
2. That the Delimitation committee constituted by Election Commission of Pakistan divided the District Layyah into Two National Assembly Constituencies as **NA - 187** ( Layyah - 1) and NA-188 (Layyah - 2) and consisting of five Provincial (Punjab Assembly) constituencies as **PP-280, PP-281, PP-282, PP - 283, PP - 284** published the map of the said constituencies by way of issuance of new demarcation. Map of National Assembly constituencies is as Annex B.
3. That the said committee constituted two NA Halqa No 187 Layyah - 1 and 188 Layyah 2 comprising on Three Tehsil namely 1. Tehsil Layya with **population 977391**. 2. Tehsil Karor lal Eason with **population 594639**. 3. Tehsil Chobara **population 252200**, having total population as according to new census is **1824230** as well as total area of the district is approximately **1400000 ( 14 Lac) Acres**. Tehsil Coaubarah is the biggest Tehsil as having **total Area 775000 Acres**, Tehsil Karor having **total area 300000 Acres**, and Tehsil Layyah having **area 325000 Acres**. AS per Election Commission Act & Rules, Population and the area of the District Layyah was to be divided into equal status while preparing the constituency from north end to south which has not been done in the required manner of Election Commission and principles.
4. That constituency **NA - 187** was to be constituted by the Delimitation Committee which is as under:  
**NA-187** comprising of total population of two Tehsils 1 (Karor Lal Eson and 2) Tehsil Chaubarah and one qanoongi Sumra Nashaib

①  
28/03/2018  
1-7

of Tehsil Layyah. Total population of NA-187 was shown as 917000 approximately and the radius of NA-187 is comprising on approximately more than **1100000 Acres**, the other constituency of NA-188 is comprising on only one Tehsil Layyah excluding qanoongoi Sumra Nashaib Layyah with the population approximately **907000** and the radius area of NA-188 is approximately comprising on **300000 Acres**.

2

8/28/03/2018

5. That while preparing the said constituency, said committee violated the principal as laid down under section 20 of the Election Commission Act-2017 as well as the section 10 of the Election Commission Rules-2017. As per the said rules and regulations, while preparing both the delimitation of the constituency NA-187 and NA-188 violated the basic principal of clockwise from north *end* to south. If it is started from north to south clockwise then half area of the Tehsil Chaubarah would be included in NA-187 and half area of Tehsil Chaubarah would be included in NA-188 which is against the mandatory provision of law because as per the section 20 of Election Commission Act-2017 as well as section 10 of the Election Commission Rules-2017 following draft proposal of delimitation of the constituencies would be the appropriate, so for the kind perusal section 20 of Election Commission Act-2017 and section 10 of the Election Commission Rules-2017 are reproduced as under:

“Principles of delimitation: ---(1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal

3

28/03/2018

Areas two or more separate areas may be grouped into the constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

(4) If the limit of ten percent under sub-section (3) in exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.

Section 10 of Election Commission Rules is also reproduced as under:

Draft proposals for delimitation of constituencies.---(1) A delimitation committee constituted under rule 9 shall, immediately after its constitution, proceed to obtain from Pakistan Bureau of Statistics, population data of last census officially published along with relevant maps showing therein census charges, census circles and census blocks along with description, relating to a Province, an agency, or any other administrative or revenue unit as it may require.

(2) The Delimitation Committee Shall also obtain district maps along with description, duly authenticated by Pakistan Bureau of Statistics, or as the case may be, the district head of Revenue Department, prepared on a uniform scale as may be determined by the Commission indicating therein details of all administrative and revenue units in the district to the level of a Patwar Circle or as the case may be, a Tapedar Circle, as well as prominent geographical and physical features, such as rivers and mountains and any other information as may be determined by the Commissioner or required by the Committee.

(3) In preparing draft proposals for delimitation of constituencies, the delimitation committee shall follow the

4

8/28/03/218

principles of delimitation as laid down in section 20, procedure given in this chapter and guidelines provided by the Commission from time to time.

(4) The constituency for an Assembly shall not ordinarily extend to more than one district except in exceptional circumstances for reasons to be recorded by the Delimitation Committee.

Provided that a patwar circle or, as the case may be, a Tepedar Circle shall be the basic unit for delimitation and it shall not be broken under any circumstances.

Provided further that in case of urban areas census circle shall not be broken under any circumstances.

(5) As far as possible, the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or as the case may be, the agency and then proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota; provided that the quota under this sub-rule shall be determined by dividing total population off the district or the agency with number of seats allocated to that district or agency:

Provided further that the variation in population between two or more constituencies shall not ordinarily exceed ten percent and the Delimitation Committee shall record reasons, if in exceptional circumstances, the variation has to exceed the limit.

(6) For the purpose of preparation or draft proposals for delimitation, the delimitation committee may require assistance from any Federal, Provincial or, as the case may be, a local government authority.

(5)

28/03/2018

(7) After the draft proposals for Delimitation of Constituencies are finalized on Form - 5, the Delimitation Committee shall send the same to the Commission, within the time specified and in the manner as may be determined by the commission.

So, keeping in view the above - mentioned Election Commission Act and Election Commission Rules, each Constituency may be prepared from North to South clockwise zigzag manner, haing each constituency equal population and approximately equal area according to the principles of Delimitation act and rules. So the following table is given by showing the population, Qanoongoi and patwar circle as proposed constituency NA-187 as well as the proposed table of the Constituency.

Sr. No	Qanoongoi	Patwar Circle	Population
1.	All Qanoongoi's of Tehsil Karor Lal Eason	All Patwar Circles of each qanoongoi of Tehsil Karor Lal Eason	594639
2.	Sumra Nashaib Layyah	All Patwar Circles	70862
3.	Mandi Town No 2 Layyah	117/TDA 128/TDA 120/TDA	12853 5690 11866
4.	280/TDA of Tehsil Layyah	277/TDA 282/TDA 332/TDA	30709 20140
5.	318/TDA of Tehsil Chaubarah	All Patwar Circles	44824
6.	Nawan Kot of Tehsil Chaubarah	All Patwar Circles	77096
7.	MC Chaubarah of Tehsil Chaubarah	All Patwar Circles	48275
8.	Rafiq Abbas of Tehsil Chaubarah	347/TDA 349/TDA 344/TDA 327/TDA	4743 4680 5650 4836
		Total Population	910454

Proposed Map of the constituency NA-187 is attached which is prepared in the light of the section 20 of the Election Commission Act - 2017 as well as section 10 of the Election Commission Rules - 2017.

18

11/28/2018

6. So the following detail is given under by showing the population, qanoongoi and Patwar circle as proposed constituency NA-188.
- A. All Tehsil Layyah except
- i. qanoongoi Sumra Nashaib Layyah,
  - ii. Patwar Circles of Qanoongoi Mandi Town No 2 Layyah 117/TDA, 128/TDA, 120/TDA of Tehsil Layyah.
  - iii. Parwar Circles of Qanoongoi 280 129/TDA, 282/TDA and 277/TDA of Tehsil Layyah)
- B. Qanoongoi Shair Garh of Tehsil Chaubarah with all Patwar Circles.
- C. Qanoongoi 452 of Tehsil Chaubarah with all patwar circles.
- D. Patwar Circles of Qanoongoi Rafiq Abad 380/TDA, 379/TDA, 375/TDA, 374/TDA and 406/TDA of Tehsil Chaubarah and it makes the population of NA - 188 Layyah 2 comprising population **913776**.
7. That the proposed map shows approximately equal population, area, radius distance, notable cities, roads, police stations, width and length of the area of the constituency as well as the suitable approach to the central place of the constituency.
8. That the objection petition is being filed before the authority/ secretary election commission within time.

7

28/03/2018

Pray:

In view of the afore-said submissions and discussions, it is humbly prayed this representation/ objection petition may very kindly be graced with acceptance and both Delimiting constituencies NA-187 & NA - 188 may kindly be approved as per proposed by the petitioner according to map as attached with for the supreme interest of justice.

.... Humble Petitioner.....

Dated 27-03-2018

**HAFEEZULLAH**

S/O Ghulam Qadir

R/O Chak No. 314 of Tehsil Chaubarah,  
Qanoongoi 318 Patwar Circle ~~313~~, (313)

Serial Vote no 87

Tehsil Chaubarah, District Layyah.

NIC : 32201-0493907-1

Ph # 0300-6766552

