

BEFORE THE ELECTION COMMISSION OF PAKISTAN

1. Muhammad Nawaz Qadir, son of Ghulam Haider, resident of Mohalah Islampura, Midh Ranjha, Tehsil Kot Momin, District Sargodha

VERSUS

1. Public at Large

REPRESENTATION/OBJECTION PETITION UNDER SECTION 21(2)(3) OF THE ELECTIONS ACT 2017 REGARDING CONSTITUENCY NA 89 SARGODHA-II AND READJUSTMENT OF REMAINING CONSTITUENCIES OF THE DISTRICT SARGODHA

Respectfully Sheweth:

1. That the petitioner is a voter member of Mohalah Islampura, Midh Ranjha, Tehsil Kot Momin, District Sargodha. He is an eligible voter. Copy of the voter list is attached herewith as Annexure A.
2. That the petitioner has already moved proposals under section 21(1) of the Elections Act, 2017 and the said proposal has been received. Copy of application is attached herewith as Annexure B.
3. That the petitioner being the holder of Identity Card No. 38401-0268876-9. The petitioner is a registered voter of NA-89 Sargodha II, thus, he has locus standi to move this Representation/Objection Petition regarding delimitation of the above said constituency.

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4. that the present constituency of NA 89 Sagodha II is comprising of Tehsil Kot Momin, Bhagtanwala Halqa Qanungo, Mitha Luk Halqa Qanungo, Ajnala Patwar Circle of Marri Qanungo Halqa, Patwar Circle 29/S.B, Patwar Circle 30/S.B, Patwar Circle 33/S.B, Patwar Circle 34/S.B of Chak No. 90/S.B Qanungo Halqa, Tehsil Sargodha.

5. That as submitted earlier the Petitioner has already moved suggestions/proposals as envisaged by Section 21 (1) of the Election Act 2017, but still the Petitioner is aggrieved by the proposed constituency and wants to raise the following objections/representation against the proposed preliminary report of the delimitation committee on the following: -

A. That the following Patwar Circles of Qanungo Halqa Kot Momin and Bhabhra may be excluded from NA 89 and the same can be included in NA 88.

- I. Patwar Circle Chaowal
- II. Patwar Circle Hujjan
- III. Patwar Circle Uppi
- IV. Patwar Circle Rawana
- V. Patwar Circle Waan Miana
- VI. Patwar Circle Bhabhra

B. That revenue estates Chau Wal, Hujjan, Uppi and Rawana of Qanungo Halqa of Kot Momin and Waan Miana and Bhabhra of Qanungo Halqa Bhabhra may be excluded because keeping in view the principle of delimitation of the constituency NA 88 is to be started from north side and proceed in a clockwise zigg zag manner, thus, keeping in view this very criteria/principle, the deficiency of population of NA 88 can not be met by including Marri Qanungo Halqa

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of the Sargodha in this constituency because it is towards west and is part of Tehsil Sargodha. Keeping in view the criteria of clockwise Tehsil BHABHRA is towards north side and also travels in clock wise. It is further requested that originally all these three Tehsil i.e Bhalwal, Bhera and Kot Momin was part of Tehsil Bhera latter on after Canal System probably in 1912 Tehsil Bhera came to end and all this area became part of tehsil Bhalwal. It means that Tehsil Bhalwal is mother Tehsil of Bhera and Kot Momin and formation of NA 88 by this way will be natural and fulfill all other requirements.

- C. That due to above said adjustment not only constituency NA 88 but constituency NA 89 would also be converted in a compact unit.
- D. That Halqa Qanungo Marri of Tehsil Sargodha has already been included in constituency NA 88 in preliminary report and the same should be excluded from NA 88 because it does not fall within the ambit of clockwise rotation and this Qanungo Circle is part of Sargodha Tehsil since time immemorial and Patwar Circle suggested are part of old tehsil Bhalwal thus there is no justification to bifurcate old Tehsil Bhalwal through proposed delimitation. The voters of old Tehsil Bhalwal can be adjusted in their own circle.
- E. That in order to meet up the deficiency NA 89 the proposed constituency of NA 89 can be extended to full Qanungo Halqa 90/S.B and Patwar Circles of Chak No. 19/N.B and Marri of Qanungo Halqa Marri thus by this way the principle of population according to the policy can be meet up. It is further motioned that

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Qanungo Halqa Bhagtanwala, Mitha Lak, Ch # 90 S/B, of Sargodha Tehsil were even part of this constituency in delimitation 1970 election because the same make compact block.

F. That proposed NA 88 proposed constituency consisting of Tehsil Bhalwal and Behra and Qanungo Halqa Marri excluding Ajnala Patwar Circle. Now it is proposed that Tehsil Bhalwal, Bhera the following Patwar Circles of Qanungo Halqa Kot Momin and Chau Wal, Hajun, Uppi and Rawana, Patwar Circle of Bhabhra and Wah Miana of Qanungo Halqa Bhabhra Tehsil Kot Momin should be included in NA 88, thus. It will be a compact block and it also fulfill the requirement of principle of population.

G. That the proposed NA 91 is comprising of Qanungo Halqa 90 excluding Patwar Circles 29, 30, 33 & 34, Qanungo Halqa 46/S.B, Qanungo Halqa Shaheena abad, Qanungo Halqa 92/N.B, Sargodha-II Tehsil Sillanwali but if the said constituency is reconstituted in view of proposed delimitation and Qanungo Halqa 90/S.B is included in NA 89 and Qanungo Halqa 92/N.B along with Patwar Circles 87/N.B, 86/N.B, 79/N.B, 78/N.B, Dharema, Dharema Depot and Patwar Circle of 74/N.B, 69/N.B, 75/N.B and Patwar Circle of ^{Qanungo Sargodha I} Sargodha 1 can conveniently be included in proposed constituency of NA 90 and the question of imbalance of population will not arise by the proposed constituency..

H. That the proposed area/constituency of NA 91 is Qanungo Halqa Shaheenababd and Tehsil Sillanwali,

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Halqa Qanungo Chak No.46/S.B, Haqla Qanungo 92/N.B can be included.

- I. That the proposed constituency NA 90 includes Sargodha City, Sargodha Cantonment and Sargodha-I Qanungo Halqa. The said constituency can be reconstituted after the reformation/ inclusion/ exclusion of Patwar Circles Sargodha-I and Sargodha-II Halqa Qanungoi keeping in view the principle of Compact Block and clock wise rotation.

Suggestions for NA 92:

1. Patwar Circle 116/N.B, 119/N.B of Sillanwali Tehsil may kindly be excluded from NA-92 and may please be included in NA 91 where whole of remaining Tehsil Sillanwali is part and parcel.
2. Now in view of above said suggestion constituency NA 92 is proposed as under:-
 - i. Tehsil Shahpur
 - ii. Tehsil Sahiwal
 - iii. Marri Qanungo excluding Ajnala, Chak No.19/N.B and Marri Patwar Circle
6. That the representation/ objection petition is being filed within limitation.

It is, therefore, respectfully prayed that the representation/ objection petition may please be accepted and the constituencies of District Sargodha may please be adjusted/ amended keeping in view the instructions of the Election Commission of Pakistan.


Muhammad Nawaz Qadir
S/o Ghulam Haider,
R/o Mohallah Islampura, Midh Ranjha,
Tehsil Kot Momin, District Sargodha.
CNIC No.38401-0268876-9
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PETITIONER

Through

[Signature]

**Syed Muhammad Kalim Ahmad Khurshid
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**Shahid Ahmad Ranjha
Advocate High Court
C.C. No PBH 40107**

Note:

1. As per instructions this is first representation/objection petition by the petitioner against the preliminary report.