

- 2 -

R

BEFORE THE WORTHY SECRETARY
ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

Mian Abdus Sattar S/O Mian Muhammad Islam,
resident of Chak No.4-P, Jetha Bhutta, Tehsil
Kanpur, District Rahim Yar Khan. CNIC No.
31301-9345283-5, Cell No. 0300-8770528

.....Objection Petitioner

MEMORANDUM / OBJECTION PETITION
AGAINST THE PRELIMINARY DELIMITATION /
DRAFT OF CONSTITUENCIES NO. PP-255 TO
PP-261 DISTRICT RAHIM YAR KHAN
PROVINCE PUNAB PUBLISHED BY THE
ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD

Respected Sheweth,

1. That the petitioner is resident of Chak No.4-P, Jetha Bhutta, Tehsil Kanpur, District Rahim Yar Khan and is enrolled voter in Serial No.208, Family No.85, Census Code No.251050301 in Jetha Bhutta, District

Rahim Yar Khan (Copy of vote certificate is attached Annexure-A.

2. That the Election Commission of Pakistan has published the preliminary delimitation / draft of all constituencies of District Rahim Yar Khan through a Public Notice.

3. That the delimitation of constituencies PP-255 to PP-267 District Rahim Yar Khan formulated by the Election Commission of Pakistan is just the violation of all the principles, Rules, Sections and provisions laid down the Delimitation Act 2017, as well as the Delimitation Rules 2017. The map of preliminary delimitation of all constituencies is attached herewith as Annexure-B.

4. That the preliminary delimitation of constituency No. PP-261 District Rahim Yar Khan is against the law facts rules procedure principles and provisions as well as sections laid down in Delimitation Act 2017 and is liable to be rectified on the following:-

GROUND

- I) That the District Rahim Yar Khan is naturally existing from North to South as in the North of District Rahim Yar Khan, there is Indus River and on the other side-South, there is a huge area of desert of Cholistan touching to the India Border.
- II) District Rahim Yar Khan is about 170 KM into length and 60/70 KM into

2

-5-

h

width. So District Rahim Yar Khan be delimited and distributed into constituencies from east to west, whereas it can be delimited and distributed from North to South.

III) That all the Tehsils of District Rahim Yar Khan along with their infrastructure, roads, schools, existing boundaries, hospitals, common source of communication are from North to South, so district Rahim Yar Khan cannot be delimited from East to West, which is unnatural and against the ground realities.

IV) That District Rahim Yar Khan is consisting upon 13 provincial constituencies and in previous delimitation all the 13 provincial

- 6 -

N

constituencies were within its Tehsil boundaries i.e. Liaquat Pur, Khanpur and Sadiq Abad all Tehsils were consisting upon three constituencies whereas Rahim Yar Khan was consisting upon four (04) provincial constituencies. So all the constituencies were delimited within its Tehsil boundaries.

- V) That now as population of two Tehsils i.e. Sadiq Abad and Rahim Yar Khan has increased, so now it is impossible to delimit all the Tehsils within its boundaries.
- VI) That according to the proposal of petitioner, all the constituencies are in accordance with the rules, principles,

sections, provisions laid down in the rules and law.

VII) That population of district Rahim Yar Khan is 4,814,006 and if it is distributed and divided upon 13 provincial constituencies than the average population becomes about 370,000 and with 10% addition it becomes about 407,000 and with the 10% less it becomes about 333,000.

VIII) That in the previous delimitation Tehsil Liaquat Pur and Cholistan were consisting upon three provincial constituencies. The population of Tehsil Liaquat Pur is about 947,328 and Cholistan is consisting upon the population of 88181, if both the populations i.e. Liaquat Pur and

- 8 -

h

Cholistan are included then three provincial constituencies can be delimited and formulated within Tehsil Liaquat Pur without disturbing the golden principles, rules, provisions and sections of 2017.

IX) That in the present delimitation Khanpur Tehsil has been disturbed abruptly because the population and areas of Khanpur Tehsil has been divided and distributed into five different provincial constituencies. So it's the gross violation of delimitation rules and principles, provisions, sections laid down in the Delimitation Rules & Act, 2017.

X) That provincial constituency No.PP-261 is the worst example of

Delimitation in the District Rahim Yar Khan, which is approximately under the three National Constituencies i.e. NA-176, NA-177 and NA-179 and its length is 75 KM without any direct link of roads and common sources of communication, which is visible upon the map issued by the ECP.

- XI) That if we travel from one portion and part of the constituency No.PP-261 District Rahim Yar Khan, we have to cross more than five (05) Provincial Constituencies i.e. First of all we have to cross Town Sehja which is situated in PP-258 then MC Kot Samaba and then we have to cross the PP-262, PP-263 & PP-264, which is not compact into areas, not from North to South and not feasible and comfortable in all

- 10 -

respectives of rules and principles,
provisions, sections laid down in the
Delimitation Rules & Act, 2017.

XII) That Tehsil Khanpur requires only approximately 100,000 from Tehsil Rahim Yar Khan and it must be taken from one part or portion of Tehsil Rahim Yar Khan which must be from North to South and if the population of QHs Rukan Pur is taken partly to constitute the constituency of Khan Pur then it becomes an ideal, comfortable and feasible delimitation as Khan Pur Tehsil is consisting upon 983,415 and it requires only 100,000 population more to be taken from District Rahim Yar Khan to complete three (03) provincial constituencies.

2

- 11 -

PROPOSALS:-

i) That the Provincial Constituencies of District Rahim Yar Khan be formulated and delimited from North to South with the parity of population compactness of areas, common sources of communication, public convenience and infrastructures.

j) That the proposed constituencies along with population is enclosed herewith as annexure-D, which is the part of proposal.

- 12 -
- ii) That 07 constituencies from PP-255 to PP-261 of District Rahim Yar Khan be delimited and formulated according to the proposed map (which is the part of proposal) copy of map is attached as annexure-E.
- iii) Remaining Six (06) constituencies are not in question.


PRAYER

In the circumstances mentioned above it is humbly prayed that the Provincial Constituencies of District Rahim Yar Khan i.e. constituency No. PP-255 to constituency PP-261 District Rahim Yar Khan may kindly be delimited and formulated with the exclusion and inclusion of populations in

the light of proposed map along with proposed data of population (annexure-F which is the part of the prayer) in the interest of justice and public.

MIAN ABDUS SATTAR
Petitioner

Through Counsel



KHURSHID AHMAD KHAN CHANDIA
Advocate High Court
Petitioner in Person.
0300-6718153