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

?

Muhammad Naeem Ayaz son of Ayaz Ahmed, Caste: Ghaleja, resident of P.O Zahir Pir Basti Yarani, Hasil Pur, Tehsil Khanpur, District Rahim Yar Khan. CNIC No.313013-083438-7, Cell No.0305-3734742.

.....Petitioner

**REPRESENTATION/OBJECTION AGAINST THE
PRELIMINARY DELIMITATION / DRAFT REGARDING
THE PROVINCIAL CONSTITUENCIES PP-256, PP-259,
PP-261 DISTRICT RAHIM YAR KHAN**

Respectfully Sheweth:

1. That the petitioner is resident of above said address and also residing in constituency PP-259 RAHIM YAR KHAN, ID Card and certificate of voter member of constituency PP-259 RAHIM YAR KHAN are attached herewith as **Annex-A & A1**.

2. That the preliminary delamination/draft regarding the provincial constituencies of District RAHIM YAR KHAN i.e. PP-259 RAHIM YAR KHAN is against the fundamental rules, principles, provisions and

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sections laid down in the Delimitation Rules and Act, 2017.

3. That as per the preliminary² delimitation regarding the provincial constituencies District RAHIM YAR KHAN in which PCs Samoka, Fateh Pur have been deleted in PP-259 RAHIM YAR KHAN, whereas PCs Pallo Shah, Kot Samaba and Mianwali Qureshian have been included which is against the laws, rules, provisions, sections laid down in The Delimitation Rules, 2017.
4. That the present formulation/preliminary delimitation draft is totally against the existing boundaries compactness of areas, common sources of communication, infrastructures and public convenience, which are the basic and fundamental rules and guidelines for the purpose of delimitation.
5. That Election Commission of Pakistan has negated ignored and deviated as well as violated the fundamental rules, principles, provisions and

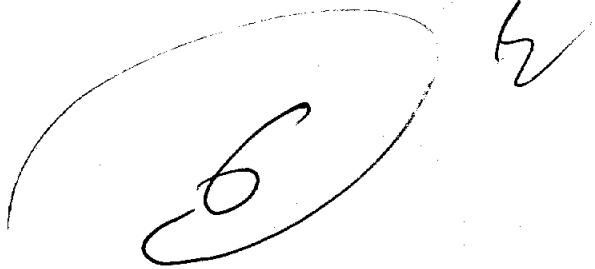
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sections laid down in the Delimitation Rules and Act, 2017, which is totally contradictory and opposite to the prescribed formula, laws, rules and provisions, so is liable to be modified, rectified and revised.

6. That PCs Samoka, Fateh Pur are very closed nearest and adjacent being part and partial of PP-261 District RAHIM YAR KHAN, which is liable to be rectified, modified and revised.
7. That the preliminary draft/delimitation is liable to be modified, rectified and revised upon the following grounds:

GROUND:

- a. That PCs Samoka & Fateh Pur are very close and near to Tehsil Head quarter Khanpur and are situated at a distance of only Eleven (11) Kilometers from Tehsil Head Quarters Khanpur, which is the

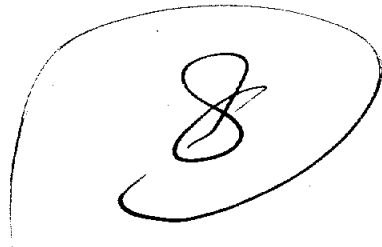

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- b. That PCs Samoka & Fateh Pur at a distance of in all respective of compactness of areas, parity of population, existing boundaries, infrastructure, common sources of communication and particularly public convenience in the interest of public.
- c. That PC Fateh Pur are situated at the double road/one way/dual carriage way road from Khanpur to Zahir Pir and total population of the PC Fateh Pur is situated to the northern side of the road so it is comfortable, feasible keeping in view and mind the compactness of areas, existing boundaries, common sources of communication, infrastructure and public convenience with its inclusion into PP-259 Tehsil Khanpur District RAHIM YAR KHAN.
- d. That PCs Samoka, Fateh Pur are very close, nearest, adjacent and part and partial of PP-259 District RAHIM YAR KHAN so is liable to be

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excluded from PP-256 Khanpur and to be included in PP-259 Khanpur.

- e. That the population of PC Fateh Pur is 12,326 and QH Samoka is 13235 so with the exclusion of PC Mianwali Qureshian, Pallo Shah and Kot Samaba become very ideal in all respective of parity of population, compactness of areas, existing boundaries, common sources of communication and in the interest of public convenience.
- f. That the present preliminary delimitation/draft is gross violation of fundamental rules, principles, provisions and sections laid down as the areas containing to each and every constituency or not into compact blocks of population in connection with common source of communication, infrastructure, existence of boundaries and public convenience, whereas with the exclusion of PC Mianwali Qureshian and Pallo Shah from provincial constituency number PP-256 Tehsil Khan Pur district RAHIM YAR KHAN and its inclusion into

provincial constituency number PP-259 Tehsil
Khanpur District RAHIM YAR KHAN.

- g. That the preliminary delimitation/draft is liable to be modified, rectified and revised as there is no parity of population, compactness of areas with existing boundaries, common source of communication, infrastructure and public convenience and it can be perused in the preliminary delimitation/draft.
- h. That the proposal of the petitioner given below is in accordance with the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017 keeping in mind and view all the fundamental rules and principles of compactness of areas existing boundaries, sources of communication and in the interest of public convenience laid down in The Delimitation Rules and Act, 2017.

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PROPOSAL:

That the area and population of PC Mianwali Qureshian, Pallo Shah and Kot Samaba be excluded from provincial constituency number PP-259 Tehsil & District RAHIM YAR KHAN and to be included in PP-261 Tehsil & District RAHIM YAR KHAN as well as the area and population of PC Fateh Pur and QH Samoka be excluded from provincial constituency number PP-256 Tehsil Khanpur District RAHIM YAR KHAN and be included in provincial constituency number PP-259 Tehsil & District RAHIM YAR KHAN.

PRAYER:

In the circumstances mentioned above, it is humbly prayed that by accepting this memorandum petition the area and population of PC Mianwali Qureshian, Pallo Shah and Kot Samaba be excluded from provincial constituency number PP-259 Tehsil & District RAHIM YAR KHAN and to be included in PP-261 Tehsil & District RAHIM YAR KHAN as well as the area and population of PC Fateh Pur and QH Samoka be excluded from provincial constituency number

included in provincial constituency number PP-259 Tehsil
& District RAHIM YAR KHAN in the interest public and
justice.

Petitioner
Muhammad Naeem Ayaz

Through

Shahzad Asghar Khan Rind
Advocate High Court
0308-7655444