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BEFORE THE WORTHY SECRETARY,
ELECTION COMMISSION OF PAKISTAN
(ECP), ISLAMABAD


Muhammad Talha Yousaf son of Muhammad Yousaf, Caste Rajpoot, resident of Sultan Town, Sadiq Abad, District Rahim Yar Khan. CNIC No.31304-7665362-9, Cell No. 0331-6061062.

.....Objection Petitioner

MEMORANDUM / OBJECTION PETITION
AGAINST THE PRELIMINARY
DELIMITATION/DRAFT REGARDING THE
PROVINCIAL CONSTITUENCIES PP-266 AND PP-
267 DISTRICT RAHIM YAR KHAN


Respectfully Sheweth:

1. That the petitioner is resident of Sultan Town, Sadiq Abad, District Rahim Yar Khan and is enrolled voter at serial No.198, Family No.109, Census Code No.253130306, in constituency No.PP-267 District Rahim Yar Khan. Copies of CNIC and vote certificate are attached herewith as **Annex-A & A1**.
2. That Election Commission of Pakistan has



regarding the provincial constituencies of District Rahim Yar Khan. Public notice is attached herewith as **Annex-B**.

3. That the ECP has formulated and drafted the preliminary draft/delimitation keeping all the golden principles, rules, sections, provisions and guidelines laid down in delimitation Act and Rules, 2017.
4. That the preliminary delamination/draft regarding the provincial constituencies of District Rahim Yar Khan i.e. PP-266 AND PP-267 Rahim Yar Khan is against the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017.
5. 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.

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6. That Election Commission of Pakistan has negated ignored and deviated as well as violated the fundamental rules, principles, provisions and 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.
 7. That the preliminary draft/delimitation is liable to be modified, rectified and revised upon the following grounds:

GROUND:

- a. That the PC No.(i) Chak No.186-P (ii) Chak No.136-P, (iii) Chak No.261-P, Tehsil Sadiq Abad are part and partial being most close and nearest and adjacent to PP-267 Rahim Yar Khan but these PCs have been included in PP-266 District Rahim Yar Khan is liable to be rectified by keeping all fundamental rules, golden principles, provisions and sections laid down in the Delimitation Rules

- b. That the population of all three (03) PCs i.e. Chak No.186-P, Chak No.236-P & Chak No.261-P, Tehsil Sadiq Abad are liable to be included in Chak No.267.
- c. That the ECO while delimitating the both the constituencies negated and deviated from the fundamental rules, principles, provisions and sections laid down i.e. both the constituencies have been delimited from east to west, whereas the delimitation must be taken from north to south as District Rahim Yar Khan is situated naturally from North to South and its all infrastructure, existing boundaries and compactness of area, sources of communication are from North to South.
- d. That with the exclusion of population PC Chak No.186-P, Chak No.236-P and Chak No.261-P, Tehsil Sadiq Abad, the compactness of areas, existing boundaries, and common sources of communication and in the public convenience and interest, both


the constituencies are very ideal and comfortable.

- e. That all 3 PCs i.e. 186-P, 236P & 261-P Tehsil Sadiq Abad are very close to PP-267 and all sources of irrigation are common with other areas of PP-267 as well as the road, bus stop and other business centers, hospitals, schools, infrastructure are also common with the common source of communication.
- f. That PP-266 is far away from all these 03 PCs 186-P, 236P & 261-P Tehsil Sadiq Abad, so with the inclusion of these PCs into Chak No.66, both the constituencies are disturbed due to the 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.
- g. That with the exclusion of PCs 186-P, 236P & 261-P Tehsil Sadiq Abad both the

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constituencies are become within the frame of golden principles, rules, provisions and sections and in accordance with parity of areas, common sources of communication and in all respective laid down in the rules and act.

- h. 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.
- i. 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.

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- j. 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.

PROPOSAL:

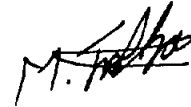
That areas and population of all three (03) PCs i.e. PC Chak No.186-P, PC Chak No.236P & PC Chak No.261-P Tehsil Sadiq Abad, District Rahim Yar Khan (Population of all 3 PCs 20,399) be excluded from PP-266 and be included in PP-267 District Rahim Yar Khan. That the proposed map is attached herewith along with population data.

That the above mentioned proposal is very close to the compactness of areas, parity of population, existing boundaries, and common source of communication, infrastructure and public convenience, as the population data along with

proposed map is the part of proposal of the petitioner.

PRAYER:

In the circumstances mentioned above, it is humbly prayed that the population (Population of all 3 PCs 20,399) and areas of all three PCs i.e. PC Chak No.186-P, PC Chak No.236P & PC Chak No.261-P Tehsil Sadiq Abad, District Rahim Yar Khan may kindly be excluded from PP-266 and may kindly be included in PP-267 in the interest of public and justice.



Petitioner
Muhammad Talha Yousaf
0331-6061062

Through



Khurshid Ahmed Khan
Chandia
Advocate High Court
0300-6718153