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BEFORE THE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD

Mohammad Nawab Khan Gopang son of Sardar Khizer Hayat Khan, caste Gopang, resident of Basti Sultan Pur, Tehsil Alipur, District Muzaffargarh.

PETITIONER

VERSUS

Election Commission of Pakistan, Islamabad.

RESPONDENT

OBJECTION PETITION AGAINST THE
DELIMITATION OF CONSTITUENCY PP-
276 ALIPUR, DISTRICT
MUZAFFARGARH, IN WHICH 02
PATWAR CIRCLES MAUZA GHALWAN-I
AND MAUZA GHALWAN-II OF
QANOONGOI CIRCLE ALIPUR II HAVE
BEEN WRONGLY INCLUDED IN PP-276
WITHOUT FACTS, WHICH IS AGAINST
SECTION 20 OF DELIMITATION ACT,
2017.

Respectfully Sheweth,

1. That the brief facts of the case giving rise to the filing of instant objection petition are precisely submitted that the petitioner is resident of Basti Sultan Pur, Tehsil Alipur, District Muzaffargarh having Serial No.675 of Union Council Sultanpur, District Muzaffargarh, which falls in the

constituency PP-276. Copy of serial number is being appended herewith as **Annex A**.

2. That according to the power envisaged through Election Act, 2017 under section 17, the respondent has delimited the constituency of the residents of the petitioner without any legal justification and without any reasoning, which are objected inter alia on the following: -

GROUND

- a. That according to the section 20 of the Election Act, 2017, it is very much clear that the delimitation would be performed keeping in view of the geographical compact area, physical features, existing boundaries of administrative units, facilities of communications and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies. The Learned Commission has not recorded any good reason in writing about the delimitation of the constituency PP-276 and has changed the whole map of the constituency PP-276, thus affecting the whole picture of the constituency. Such act of the Commission is illegal and without any fact to establish the fact that such delimitation was necessary for the welfare of the voters of the concerned constituency. Copy of map is being appended herewith as **Annex B**.
- b. That it is very also important to mention here that Mauza Ghalwan-I and Ghalwan-II are natural and integral part of PP-277, but due to the impugned act of the respondent, the inclusion of Ghalwan-I and Ghalwan-II has become an unnatural extension of PP-276, which would affect the welfare of the voters in the

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Ghalwan-I and Ghalwan-II as an extension is being appended herewith as **Annex C**.

- c. That instead of including of Mauza Ghalwan-I and Ghalwan-II in PP-276, was Mauza Baqir Shah Shumali, Mail Manjhate and Fateh Pur-II of Patwar Circle Qanoongoi Circle Alipur-I was to be included in PP-276 instead of PP-277, which is again a mistake done by the respondent. In fact, such changing were done in a mechanical manner without any reasoning, which has changed the whole maps of PP-276 and PP-277. Copy of map showing Mauza Baqir Shah Shumali, Male Manjhate, Fateh Pur-I being part of PP-277 is being appended herewith as **Annex D**.
- d. That the impugned delimitation has changed the geographical compactness of the PP-276 and PP-277 and has also affected the physical compactness and such act has not been done keeping in view of the public convenience. Such act of the Election Commission of Pakistan is against the public tranquility and also against the dictum of natural justice.
- e. That the impugned delimitation has not been performed in a clockwise manner, which is most important principle for performing the delimitation. Such act of the respondents also depicts that the impugned act of commission was performed in a stereo type manner and is liable to be set aside.
- f. That Mauza Ghalwan-I (population 22474) and Ghalwan-II (population 18090) total 40564, have wrongly been included in PP-276 through this impugned delimitation. In fact, Mauza Baqir Shah Shumali (population 10540), Mail Manihate

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total 38491, were to be included in PP-276 instead of
therein inclusion in PP-277.

g. That the petitioner ran from pillar to post for the redressal of his grievances, but the voice of the petitioner was not heard in the deaf corridors of the powers and no one is ready to turn his deaf ears to the shrieks of the petitioner, therefore, the petitioner begs for the special indulgence of this Hon'ble Court.

PRAYER: -

Under the above submissions, it is prayed that the instant objection petition may very kindly be accepted and Mauza Ghalwan-I (population 22474) and Ghalwan-II (population 18090) total 40564 may very graciously be excluded from PP-276 and Mauza Baqir Shah Shumali (population 10540), Mail Manjhate (population 6392) and Fateh Pur-II (population 21559) total 38491 may very kindly be included in PP-276 in the supreme interest of justice.

PETITIONER

Dated:

Through:

JAMES JOSPEH,

Qasim Tangwani Adv.
QASIM BIN SAJJAD TANGWANI,

Advocates High Court,
Opp. High Court Building,
Multan.

CERTIFICATE: -

As per instructions of my client it is first objection petition on the subject matter before this Hon'ble Court.