

To,
The Secretary Election Commission of Pakistan
(Islamabad).

**OBJECTIONS REGARDING PROPOSED DELIMITATION OF
UNION COUNCIL DOBERAN KALAN, TEHSIL KALLAR
SYEDAN, DISTRICT RAWALPINDI (PP7 AND PP8
RAWALPINDI).**

RESPECTFULLY SHEWETH:.

1. That the petitioner namely Raja Nadeem Ahmed S/o Mahmood Hussain is chairman and ex- Nazim of the UC Doberan Kalan and resident of Bhatti, P/o Khas, Sakot, Tehsil Kallar Syedan, District Rawalpindi.
2. That the Union Council Doberan Kalan was part of NA-50 and PP-2, in General Elections of 2013 but in new proposed delimitation which was announced on 05 march 2018 the Union Council Doberan Kalan divided into two provincial constituencies in PP-7 and PP-8 Rawalpindi which is against the ground reality. It is pertinent to mention here that the whole Union Council Doberan Kalan should be part of PP-8.
3. That the petitioner prayers for correct (on Merits) delimitation on the following amongst other.

GROUNDS:.

- i. That the proposed delimitation is unnatural and against the law.
- ii. That the proposed delimitation regarding Union Council Doberan Kalan is against the ground reality.
- iii. That according to new proposed delimitation the Whole Union Council Doberan Kalan is part of NA-57 Rawalpindi but in provincial Assembly



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Constituencies the Union Council Doberan Kalan is part of PP-7 and PP-8, which is against the ground reality and unnatural.

- iv. That the proposed delimitation regarding Union Council Doberan Kalan is against the fundamental rights of the people of said Area.
- v. That at the time of delimitation of Union Council Doberan Kalan the public Convenient should be kept in mind for welfare of the people of the said Area.
- vi. That the proposed delimitation regarding UC Doberan Kalan is totally violation of Constitution of Islamic Republic of Pakistan.
- vii. That the act of ECP is an attempt for giving benefit to their political favorites.
- viii. That the ECP is not acting fairly and impartially rather are misusing the powers and causing discrimination with the people of UC Doberan Kalan.
- ix. That the fundamental rights of the people of UC Doberan Kalan have been infringed in the hands of ECP.
- x. That illegalities and irregularities have been committed by the ECP and they have not exercised their jurisdiction vested in them according to law and Constitution.
- xi. That at the time of proposed delimitation by the ECP the suggestions and wishes of the people of UC Doberan Kalan have not been considered by the delimitation offers/ECP.



(3)

- xii. That if the Union Council Doberan Kalan will be divide into two constituencies the people of UC Doberan Kalan will suffer irreparable loss due to extra ordinary problems.

PRAYER:-

It is therefore, respectfully prayed that the whole Union Council Doberan Kalan may be include in proposed provincial Constituency PP-8 Rawalpindi in the interest of Justice.

It is also prayed that the proposed delimitation regarding UC Doberan Kalan Tehsil Kallar Syedan dated 05-03-2018 be declared null and void.

Any other relief which this Honorable ECP deems fit and proper may be granted.


Through

Petitioner



CHAUDHARY ASAD REHMAN
ADVOCATE HIGH COURT.

RAJANADEEM AHMED (PETITIONER)

CELL NO:- 0300-5005489

