

2

28/03/2018
2-12

BEFORE THE WORTHY SECRETARY
ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

Khurshid Ahmad Khan Chandia S/O Ghulam Sarwar
Khan Caste Baloch, resident of Aman Colony, Khanpur,
District Rahim Yar Khan. CNIC No. 31301-6222634-3
Cell No. 0300-6718153

.....Petitioner

MEMORANDUM/OBJECTION PETITION AGAINST
THE PRELIMINARY DELIMITATION / DRAFT OF
CONSTITUENCIES NO. PP-255 TO PP-267
DISTRICT RAHIM YAR KHAN PROVINCE PUNAB
PUBLISHED BY THE ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD

Respected Sheweth,

1. That the petitioner is resident of Flat No. 15, Mohallah
Rehman Colony, Khanpur, District Rahim Yar Khan
and is enrolled voter to constituency No. PP-260 Rahim
Yar Khan at Sr. No. 160 Gharana No. 53, in Census
Code No. 251120401 in Circle No. 4, Khurshid Colony,

3

A 28/07/2018

- Khanpur, 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 (Copy is attached herewith as Annexure-B).
 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-C.
 4. That the preliminary delimitation of constituency No. PP-255 to PP-267 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

4

28/07/2019

- I) That the District Rahim Yar Khan consisting upon 13 Provincial Constituencies of Province Punjab bearing Constituency No. PP-255 TO PP-267 District Rahim Yar Khan and earlier three Tehsils i.e. Khanpur and Liaquat Pur and Sadiq Abad were consisting upon equal 3/3 constituencies whereas Rahim Yar Khasn Tehsil was consisting upon 4 Provincial Constituencies and all constituencies were within the limits, premises and within the boundaries of its Tehsils.
- II) That as the population has been increased so it is not possible to keep all the constituencies within its boundaries of Tehsils.
- III) That the existing boundaries of District Rahim Yar Khan as well as its 4 Tehsils are from North to South naturally which can be perused in the map of Rahim Yar Khan. On the North area side there is Indus River and in the South area side there is a large and huge area of desert Cholistan touching to the Indian border. Its length of populated area is about 180 KM where as its width is about 60/70

5

HA/28/07/2018

KM, it's all infrastructure, roads, schools, hospitals are all from north to south. So it can't be divided and delimited from East to West. Which is against the nature which disturbing all the infrastructure, common sources of communication existing boundaries Schools, Hospitals, Municipal Committees, compactness of areas as well as public convenience and public interest.

IV) That approximately all the provincial constituencies of Rahim Yar Khan have been delimited and divided from East to West. Which is against the Law Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

V) That there is no enough direct road network available from east to west, therefore draft/preliminary delimitation of constituencies if you want to travel from one part to other part of constituency you have to cross many constituencies.

6

22/03/2018

VI) That the golden principle of compactness of areas might be kept into mind and view while delimitating the whole District Rahim Yar Khan i.e. the required population of PP-255 Rahim Yar Khan-I must be taken and then the next constituency might be formulated with the required population i.e. 256 District Rahim Yar Khan-II and then constituency No. PP-257 might be formulated and if some population is required from next adjacent Tehsil i.e. Khanpur that might be taken from one part and portion of Tehsil Khanpur, and might be from North to South and in this way the population of Tehsil Khanpur might be delimited while keeping this principle to be preferred and followed and even it might be followed in such manner for both the remaining tehsil i.e. Rahim Yar Khan and Sadiq Abad, meaning thereby the constituencies may be taken from one Tehsil and when formulating other constituencies you need population from another Tehsil. It may be taken from north to south but not

7

21/28/03/2019

east to west and from one side and in the same way be repeated to formulate another constituency which need population from another Tehsil. A Tehsil may be broken from one side in draft Khanpur Tehsil has been broken and decided in five different constituencies.

- VII) That presently in the preliminary Delimitation / draft if we travel in the same provincial constituency we have to cross several provincial constituencies in the way and there is no direct link and source of common communication from one part of the constituency to the other part.
- VIII) That Tehsil Khanpur has been delimited into 5 different provincial constituencies and even some provincial constituencies are under the different 3 National Assembly Constituencies i.e. PP-261 Rahim Yar Khan is under the 3 different National Constituencies No. NA-176, NA-177 and NA-178 Rahim Yar Khan and its length is direct from East to West consisting upon more than 70 Kilometer which against the fundamental violation of Rules,

9/20/17 12:15

Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

- IX) That draft of all the provincial constituencies is a violation of fundamental Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017, and is liable to be rectify under the proposal of petitioner.
- X) That the total population of District Rahim Yar Khan was to be divided upon 13 equal provincial constituencies and the average population of every and each constitutions is about 370000 and even with 10% addition and omission the population of any constituency at the lowest and bottom is with the figure of population 333000 and the highest figure of population is 407000 but this principle has been violated and deviated very grossly so the constituencies of whole of the District Rahim Yar Khan are liable to be modified and rectified.
- XI) That in case of proposal of the petitioner under the present draft / delimitation the principles rules sections and provision were to be preferred while

9

H/28/03/2018

delimitating the whole district of Rahim Yar Khan with the golden principles that the required population was to be taken for the PP-255 and then the next constituency was to be formulated with this principle as well as all the provincial constituencies of District Rahim Yar Khan were to be formulated with this golden principle which have not been followed.

XII) That as whole the District Rahim Yar along with all four tehsiles is from North to South and this golden principle and rules of delimitation must be followed and preferred for the delimitation, but all the Provincial constituencies of District Rahim Yar Khan are otherwise and opposite, contradictory to the basic principle and about all constituencies of Rahim Yar Khan are from East to West which is the violation of natural existance of population with compactness of areas, existing boundaries, common sources of communication and public convenience thus this the violation of fundamental Rules, Principles, Sections and

10

28/03/2016

provisions laid down in the Delimitation Act and Rules 2017.

XIII) That on proposal given by the petitioner regarding the delimitation of all the Provincial Constituencies of District Rahim Yar Khan is based upon the strong logic Fundamental Rules, Principles, Sections and provisions laid down in the Delimitation Act and Rules 2017.

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 infrastructures.
- j) That the proposed constituencies along with population is enclosed herewith as annexure-D, which is the part of proposal. A constituency may be its Tehsil limits if any more population is

11
28/03/2018

required than other Tehsil boundaries
may be disturbed.

- ii) That all constituencies 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.

PRAYER

In the circumstances mentioned above it is humbly prayed that all the Provincial Constituencies of District Rahim Yar Khan i.e. constituency No. PP-255 to constituency PP-267 District Rahim Yar Khan may kindly be delimited and formulated with the exclusion and inclusion of populations in the light of proposed map of the petitioner annexure-F along with the proposed populations mentioned in the population

2

28/03/2018
2-12

BEFORE THE WORTHY SECRETARY
ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

Khurshid Ahmad Khan Chandia S/O Ghulam Sarwar
Khan Caste Baloch, resident of Aman Colony, Khanpur,
District Rahim Yar Khan. CNIC No. 31301-6222634-3
Cell No. 0300-6718153

.....Petitioner

MEMORANDUM/OBJECTION PETITION AGAINST
THE PRELIMINARY DELIMITATION / DRAFT OF
CONSTITUENCIES NO. PP-255 TO PP-267
DISTRICT RAHIM YAR KHAN PROVINCE PUNAB
PUBLISHED BY THE ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD

Respected Sheweth,

1. That the petitioner is resident of Flat No. 15, Mohallah
Rehman Colony, Khanpur, District Rahim Yar Khan
and is enrolled voter to constituency No. PP-260 Rahim
Yar Khan at Sr. No. 160 Gharana No. 53, in Census
Code No. 251120401 in Circle No. 4, Khurshid Colony,

12

22/03/2018

distribution/data by the petitioner as annexure-G.

When formulating a constituency it might be within limits of its Tehsil if more population needed then the nearest Tehsil may be disturbed.

(Both the annexure-F & G are the part of the prayer of the petitioner).

KA

KHURSHID AHMAD KHAN CHASNDIA

Advocate High Court

Petitioner in Person.

0300-6718153