# BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN, ISLAMABAD, PROVINCE OF PUNJAB

- 1. Khalid Pervaiz S/O Ghulam Qadir, R/O Chak No. 30 / P , Tehsil Khanpur, District RYK ( PC Latki ).
- Nasir Bashir S/O Bashir Ahmad, R / O Chak No. 67 / P , Tehsil Khanpur,
   District RYK ( PC Dunyapur )
- 3. Arif Ali, S/O Muhammad Ishaq, R/O Chak No. 66 / P, Tehsil Khanpur, District RYK ( PC Dunyapur, Extended )

**Petitioners** 

#### **VERSUS**

Delimitation Authority, Provincial Assembly, Province of Punjab

Respondent

OBJECTION PETITION UNDER RULE 12, OF ELECTION RULES, 2017, SECTION 17, 19, 20, 21 & 22 OF ELECTION ACT, 2017 (CHAPTER III), READ WITH ALL OTHER ENABLING PROVISIONS OF LAW REGARDING (01) HALKA NO. PP 258, TOTAL EXISTING POPULATION 3, 57, 088 TEHSIL KHANPUR (02) HALKA NO. PP 261, TOTAL EXISTING POPULATION 3,71,634 TEHSIL RAHIM YAR KHAN.

## Respectfully Sheweth:-

1. That the addresses given in the heading of the petition are correct for the purpose of affecting service through this August Forum for the parties before this authority.





- 2. That the petitioners no. 01 03 hailing from the concerned Patwar Circle mentioned above are farmers / landlords of the locality being eligible voters according to the concerned voter list in field.
- 3. That the concerned constituency of the petitioners has been included in PP 258 Tehsil Khanpur, instead of PP 261 Tehsil RYK. The said constituency is located at a long distance from the residences of the petitioners and other inhabitants of the locality.
- 4. That the alteration effected by the delimitation authority regarding the above two stated constituencies are neither in accordance with the law nor suitable for the convenience of the inhabitants of the three stated Patwar Circles. Even then no principle of compactness has been observed by the Authority and countless problems have been created for the people of the stated three Patwar Circles.
- 5. That the petitioners propose in the light of above stated circumstances such as:

## Tehsil Khanpur PP 258 Total Existing Population: 3, 57, 088

Sr. No.	Patwar Circle ( PC )	Population	Total Population
1.	Latki	7865	
2.	Dunyapur	7898	
3.	Dunyapur Extension	6292	
			22055

## Tehsil RYK PP 261 Total Existing Population: 3,71,634

Sr. No.	Patwar Circle ( PC )	Population	Total Population
1.	Mari Allah Bachaya	10358	
2.	Mudd Elyas	8449	
3.	Moni Larr	9972	
			28779

If the three above mentioned Patwar Circles of the PP 258 Tehsil Khanpur, are excluded from its constituency and included in PP 261 tehsil RYK, and similarly if the above three mentioned Patwar Circles of PP 261 Tehsil RYK are excluded from its constituency and included in PP 258 Tehsil Khanpur, the compactness and population of both stated constituencies (PP 258 & PP 261) will become compact. i.e Population of PP 258 Tehsil Khanpur will be 3,63,812 & population of PP 261 Tehsil RYK will be 3,64,910 respectively.

- That the petitioners reproduced section 20 (1) Election Act, 2017 as a 6. reference: "All constituencies for general seats shall, as for as practicable, be delimitated having regard to the distribution of population and geographically compact areas, physical features, existing boundaries of administrative units, facility of communication and public convenience and other cognate factors homogeneity in the creation of constituencies.
- That the delimitation authority has violated the above stated sections 7. mentioned in head note of the petition hence the petitioners being aggrieved persons invoked the jurisdiction of this authority.

### <u>PRAYER</u>

In view of the above facts and circumstances, it is humbly requested that the subject objection petition may please be accepted and proposed alteration mentioned through the facts of the application may be please allowed.

Any other suitable action, which this authority thinks fit and proper, in the stated circumstances, may also be exercised.

MRIZ ALI

#### Through

Shabbir Hussain						
Advocate High Court, LLM						
Jinnah Law & Associates						
F-38, Hajvery Complex, O2-Mozang						
road, Lahore						
CC No. PRY 37139						

Ch. Riaz Ahmed Advocate Supreme Court Of Pakistan Office No.19, HC Building Bahawal Pur

Muhammad ARSHAD Adveatha office teh courts when pur