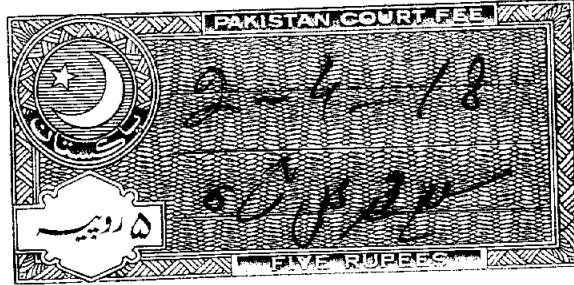


BEFORE THE ELECTION COMMISSION OF PAKISTAN



Objection Petition No. _____/2018

OBJECTIONS, UNDER SECTION 21(3) OF ELECTIONS ACT, 2017, REGARDING PP-261 RAHIM YAR KHAN ON BEHALF OF SAYED MUHAMMAD ALI SHAH SON OF SAYED QADIR BAKHSH SHAH P/O TRINDA SAWAI KHAN, WAHI JUMAN SHAH, TEHSIL & DISTRICT RAHIM YAR KHAN. MOBILE # 0345-8026000/0332-8026000

..... PETITIONER

The Petitioner Humbly Submits as follows:-

1. The petitioner is a voter of PP-261, Rahim Yar Khan. The delimitation process pertaining to the said constituency, has been initiated by this Honorable Commission; as a result whereof, a preliminary report has been published in the Official Gazette, whereby the constituency has been purposed delimited so as to include the following:

- i. Dunya Pur Ganga;
 - ii. Fateh Pur Qureshian;
 - iii. Mian wali Qureshian;
 - iv. Muhammad Pur Qureshian; and
 - v. Sikandar Abad;
- (c) The following PCs of Trinda Sawai Khan QH of Tehsil Rahim Yar Khan:-
- i. Aslam Abad;
 - ii. Wahi Juman Shah;
 - iii. Bahishti;
 - iv. Chenah;
 - v. Dari Azeem Khan; and
 - vi. Kotla Ayub Khan;
- (d) Bagh-o-Bahar QH of Tehsil Khanpur excluding following PCs:-
- i. Dunya Pur izafi;
 - ii. Dunya Pur;
 - iii. Latkai;
 - iv. Musa Kanju; and
 - v. Sehja;
- (e) Taj Garh QH of Tehsil Rahim Yar Khan excluding following PCs:-
- i. Ali Pur Machian; and
 - ii. Bahaudi Pur Machian;
- (f) Pallu Shah QH excluding following PCs:-
- i. Badli Sharif;
 - ii. Pir Abdul Malik; and
 - iii. Rang Pur;

have been overlooked with the result that the proposed delimitation is practically unworkable.

It is noteworthy that the present PP-261 was previously PP-291 and was constitutive of the following:

- (a) Kot samaba town committee.
- (b) The following QH of Rahim yar khan tehsil:-
 - i. Rukan pur;
 - ii. Kot samaba mohal;
- (c) The following PCs of Trinda sawai khan QH;
 - i. Aslamabad;
 - ii. Wahi juman shah;
- (d) The following PCs of Taj garh QH of Rahim yar khan tehsil:-
 - i. Trinda Ali murad khan;
 - ii. Kot Qutab;
- (e) Rang pur PC of pallu shah QH of Rahim yar khan district.

3. It appears that while notifying the proposed delimitation, the only effort was to balance out the population between the provincial constituencies, whereas, the essential requirements of Section 20, i.e; Compatibility, Homogeneity within the proposed constituency, as also public convenience has altogether been over looked.

4. The basic idea behind the objection being filed by the petitioner is to point out that if the proposed delimitation was to be accepted that will have an effect of attaching a geographically and intrinsically diverse minority with a larger majority having a separate distinct identity. It will clearly have an effect of stifling the voice of the former as regard their needs and requirements.

5. It is very harmful

pass from within the constituency PP-261, there by dividing the same into two distinct units. It is emphasized that this railway track earlier served as a dividing line of the constituency. It is that imperative that keeping in view the issues of mobility and distinct crossing points over such railway track the same should be readopted as the dividing line for PP-261 and the adjacent constituency.

6. The railway line has historically been considered as a sort of dividing line within the district. Both sides of the railway track is inhibited by distinct and diverse population having separate set of ideas and requirements and thus both should have a representation in the Assembly and either one of them should not be marginalized.
7. Yet another aspect which requires serious consideration is that PP 261 is overlapped by four different NA seats which will just add to the confusion and will cause serious administrative bottlenecks qua holding of a fair and transparent election. To the understanding of the petitioner no other provincial assembly constituency is over lapped with so many national assembly constituency seats.
8. Accordingly, it is suggested Provincial constituencies of District Rahim Yar Khan should be delimited as follows:

PP - 255 Rahim Yar Khan I

The following QHs of Tehsil Liaqat Pur:-

- | | |
|--|---------|
| (a) Sidhuwali QH; | |
| (b) Allahabad QH excluding the following PCs: | 115,176 |
| i. Pakhi War; | 114,147 |
| ii. Goth Mahi; and | |
| iii. Talbani; | |
| (c) Tarukri QH | |
| (d) Including the following PCs of QH Khan Bah | 80,873 |

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of District Rahim Yar Khan.

Total	365,078
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PP - 256 Rahim Yar Khan II

(a) Including the following QHs of Tehsil Liaqat Pur:-	
i. Pakka Larran QH;	128,447
ii. Khan Bela QH excluding the following PCs:-	94,723
a. Thul Hamza;	
b. Bakhshu Banhar; and	
c. Dashti;	
iii. Including the following PCs of Shaidani QH:-	97,647
a. Chanjni;	
b. Shaidani;	
c. Ashraf Shah;	
d. Kotla Mubarak;	
e. Ahmad Ali Lar;	
f. Mad Daulat Shah; and	
g. Malkhani;	
iv. Including PC Pakhi War of QH Allahabad;	8,908
(b) Including the following QH of Tehsil Khanpur:-	
i. The following PCs of QH Nawan Kot:-	24,772
a. Nawen Arain; and	
b. Feroza;	
of District Rahim Yar Khan.	

Total	354,497
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PP - 257 Rahim Yar Khan III

(a) MC Liaqat Pur;	51,989
(b) Including the following QHs of Tehsil Liaqat Pur:-	
i. 1/L Abbasia (Cholistan);	3,686
ii. 2/L Abbasia (Cholistan);	5,898
iii. 2/R (Cholistan);	11,541
iv. 7/R (Cholistan);	27,221
v. Head Farid (Cholistan);	18,153
vi. Gulshan Farid (Cholistan);	19,693
vii. Haider shah (Cholistan)	1,989
viii. Abbasia - I; and	56,126
ix. Abbasia - II;	56,560
x. Including the following PCs of QH Allahabad:-	36,091
a. Goth Mahi; and	
b. Talbani;	
(c) Including the following QHs of Tehsil Khan Pur:-	
i. Bhutta Sheikhan QH;	70,652
ii. PC Chak No. 070/A of QH Nawan Kot;	10,981

Total	370,580
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ii. QH Jajja Abbasia excluding the following PCs:-	79,500
a. Makhan Bela;	
b. Jhoran;	
c. Azim Shah; and	
d. Azim Shah Izafi;	
iii. Including PC Ghazi Pur Of QH Chachran Sharif:-	11,044
iv. Including the following PCs of QH Bagh o Bahar:-	51,944
a. Dunya Pur Izafi;	
b. Dunya Pur;	
c. Latkai;	
d. Musa Kanjun; and	
e. Sehja;	
(b) Including the following QH of Tehsil Rahim Yar Khan:-	
1. Including the following PCs of QH Rukan Pur:-	108,370
a. Jalal Pur;	
b. Sardar Garh;	
c. Kotla Rai Qabool;	
d. Missan;	
e. Peeran;	
f. Haji Pur;	
g. Ghous Pur Machian;	
h. Bahadar Pur; and	
i. Adam Arain;	
of District Rahim Yar Khan.	
Total	353,226

PP - 259 Rahim Yar Khan V

(a) MC Zahir Pir;	48,554
(b) Including the following QHs of Tehsil Khan Pur:-	
i. Samoka QH;	84,466
ii. PC Ghazi Pur of QH Chachran Sharif;	64,904
iii. Including the following PCs of QH Nawan Kot:-	59,841
a. Qazi Tahir Shaheed;	
b. Kachi Jamal;	
c. Mahmood Kot;	
d. Mahmood Shah;	
e. Nawan Kot; and	
f. Nawan Kot Izafi;	
iv. Including the following PCs of QH Jajja Abbasia:-	27,682
a. Makhan Bela;	
b. Jhoran;	
c. Azim Shah; and	
d. Azim Shah Izafi;	
v. Including PC Gullan Gulkalah of QH Khan Pur I;	6,692
vi. Including the following PCs of QH Khan Pur II;	30,697
a. Talle Wala; and	
b. Amir Pur;	
(c) Including the following QHs of Tehsil Liaqat Pur:-	

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- d. Trinda Mira Khan;
of District Rahim Yar Khan.

Total	374,595
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PP - 260 Rahim Yar Khan VI

(a) MC Khan Pur;	184,793
(b) Including the following QHs of Tehsil Khan Pur:-	
i. QH Khan Pur I excluding PC Gullan Gulkalah;	42,495
ii. QH Khan Pur II excluding the following PCs:-	27,303
a. Amir Pur; and	
b. Talle Wala;	
iii. QH Bagh-o-Bahar Excluding the following PCs:-	54,727
a. Dunya Pur Izafji;	
b. Dunya Pur;	
c. Latkai;	
d. Musa Kanjun; and	
e. Sehja;	
(c) Including the following QHs of Tehsil Rahim Yar Khan:-	
i. Including the following PCs of QH Trinda Sawai Khan:-	14,727
a. Bahashti; and	
b. Kotla Ayub;	
ii. Including the following PCs of QH Kot Samaba Abadi:-	30,219
a. Bismillah Pur;	
b. Shah Garh; and	
c. Chak No. 82/P;	
of District Rahim Yar Khan.	

Total	354,264
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PP - 261 Rahim Yar Khan VII

(a) MC Kot Samaba;	31,984
(b) Including the following QHs of Tehsil Rahim Yar Khan:-	
i. Including the following PCs of QH RukanPur:-	54,124
a. Shah Pur;	
b. Rukan Pur;	
c. Pooran;	
d. Khalti; and	
e. Kalar Wali;	
ii. Kot Samaba Mohal QH;	95,883
iii. Including the following PCs of QH Trinda Sawai Khan:-	35,697
a. Amin Garh;	
b. Aslamabad; and	
c. Wahi Jumman Shah;	
iv. Including the following PCs of QH Taj Garh:-	77,695
a. Trinda Ali Murad;	
b. Kot Outab;	

v. QH Pallu Shah excluding the following PCs:-	52,633
a. Badli Sharif;	
b. Pir Abdul Malik; and	
c. Kot Mehdi Shah;	
vi. Including PC Shaheed Wala of QH Rajan Pur; of District Rahim Yar Khan.	9,777
Total	357,793

PP - 262 Rahim Yar Khan VIII

(a) MC Rahim Yar Khan of District Rahim Yar Khan.	420,419
Total	420,419

PP - 263 Rahim Yar Khan IX

(a) MC Trinda Sawai Khan;	31,721
(b) Including the following QHs of Tehsil Rahim Yar Khan:-	
i. QH Kot Samaba Abadi excluding the following PCs:-	63,087
a. Bimillah Pur;	
b. Chak 82/P; and	
c. Shah Garh;	
ii. Bindore QH;	126,308
iii. QH Rahim Yar Khan I;	29,960
iv. QH Rahim Yar Khan II;	60,283
iv. Including the following PCs of Trinda Sawai Khan:-	38,985
a. Chenah;	
b. Darri Azeem Khan; and	
c. Sultan Pur; Including PC Tiba Larian of QH Taj Garh;	8,163
(c) Including the following QH of Tehsil Sadiqabad:- Including PC Lunda of QH Sadiqabad II; of District Rahim Yar Khan.	14,309
Total	372,816

PP - 264 Rahim Yar Khan X

(a) Including the following QHs of Tehsil Rahim Yar Khan:-	
i. QH Rajan Pur excluding PC Shaheed Wala;	142,818
ii. Including the following PCs of QH Taj Garh:-	63,909
a. Ali Pur Machian;	
b. Bahudi Pur Machian,	
c. Akramabad; and	
d. Taj Garh;	

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(b) Including the following QHs of Tehsil Sadiqabad:-	
i. QH Muhammad Pur excluding the following PCs:-	105,782
a. Jamal Din Wali;	
b. Roti Sharif; and	
c. Said Pur;	
ii. Including PC Adam Suhaba of QH Sadiqabad II; of District Rahim Yar Khan.	19,310

Total**365,387****PP - 265 Rahim Yar Khan XI**

(a) MC Ahmed Pur Lamma;	23,499
(b) Including the following QHs of Tehsil Sadiqabad:-	
i. QH Ahmed Pur Lamma excluding the following PCs:-	106,396
a. Sanjar Pur Nao;	
b. Walana; and	
c. Dinnu Shah;	
ii. Including the following PCs of QH Muhammad Pur:-	68,654
a. Jamal Din Wali;	
b. Roti Sharif; and	
c. Said Pur;	
iii. QH Shahbaz Pur excluding PC Qasmani;	81,963
iv. QH Bhong excluding PC Nawazabad; of District Rahim Yar Khan.	90,777

Total**371,289****PP - 266 Rahim Yar Khan XII**

(a) MC Sadiqabad;	239,677
(b) Including the following QHs of Tehsil Sadiqabad;	
i. Sadiqabad I QH;	47,854
ii. QH Sadiqabad II excluding the following PCs:-	19,336
a. Adam Suhaba; and	
b. Lunda;	
iii. Including the following PCs of QH Tillu Goth:-	76,735
a. Chak 186;	
b. Chak 236;	
c. Chak 261;	
d. Ghoth Jango;	
e. Muhammad Murad Machi;	
f. Jafar Pur; and	
g. Sinnah War; of District Rahim Yar Khan.	

Total**383,602****PP - 267 Rahim Yar Khan XIII**

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iii. Kot Sabzal QH;	117,355
iv. Including the following PCs of QH Ahmed Pur Lamma:-	59,741
a. Sanjar Pur Nao;	
b. Walana; and	
c. Dinun Shah;	
v. QH Tillu Goth excluding the following PCs:-	45,104
a. Chak 186;	
b. Chak 236;	
c. Chak 261;	
d. Ghoth Jangoo;	
e. Muhammad Murad Machi;	
f. JafarPur; and	
g. Sinnah War;	
vi. QH Bhong excluding PC Bhong;	12,138
vii. Including PC Qasmani of QH Shahbaz Pur; of District Rahim Yar Khan.	15,153
Total	370,460

If the suggested delimitation is accepted, the population of each constituency shall be within the limits postulated by law.

9. It is thus clear that the concept of balancing of population will also be adhered to in letter and in spirit if the delimitation suggested by the present petitioner is graciously accepted by this Honorable Election commission.

It is, therefore, most respectfully prayed that this objection petition may kindly be allowed and the delimitation proposed by the Honorable Election Commission may kindly be altered/change/corrected/effectuated in line with the delimitation suggested by the petitioner i.e. by inclusion of Tehsil Rahim Yar

delimitation as envisaged by section 20 of the Election Act,
2017..

[Handwritten Signature]

PETITIONER
THROUGH

[Handwritten Signature]

Muhammad ShahzadShaukat
Advocate Supreme Court
3-FANE ROAD, LAHORE
(C.C. # PLH-1553)

DATED: 2-4-2018