

BEFORE THE WORTHY SECRETARY,

ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

*1/26/03/2018
1-4*

ELECTION PETITION NO. _____/2018

FAISAL SHAH S/O SYED NAZAR ALI, CASTE SYED RESIDENT OF KOTLA
SULTAN SHAH P/O DAMARWAL SHOMALI, TEHSIL JATOI DISTRICT
MUZAFFARGARH. CNIC NO. 32302-5948877-5 Ph. NO. 0333-8419999.

APPELLANT

VS

ELECTION COMMISSION OF PAKISTAN ISLAMABAD.

RESPONDENT

OBJECTION PETITION

REPRESENTATION UNDER RULE 12 OF THE ELECTION RULE 2017 (THE RULE) READ WITH
SECTION 20 OF THE ELECTION ACT 2017 (THE ACT) CHALLENGING THE PRELIMINARY
PROPOSAL PERTAINING TO THE DELIMINATION OF PUNJAB ASSEMBLY CONSTITUENCIES
PP-278 TEHSIL JOTAI, DISTRICT, MUZAFFARGARH,

1. THAT, THE PETITIONER IS ENROLLED AS A VOTER AND RESIDENT OF THE CONSTITUENCY PP-279, THE PETITIONER WANT TO BE A PART OF CONSTITUENY PP-278 WHICH IS MORE RELIABLE, AND HOMOGENITICALLY AND ADMINSTRATIVE MORE CONVENIENCE FOR THE PEOPLE OF "PC" KOTLA SULTAN SHAH, QH' JOTAI.

2. THAT, THE PRELIMINARY DELIMITATION OF CONSTITUENCIES HAS BEEN PUBLISHED THROUGH PUBLIC NOTICE BY THE RESPONDENT, COPY OF NOTICE IS ATTACHED AS ANNEXD- A
3. THAT, THE PRELIMINARY DELIMITATION OF CONSTITUENCY PP-278 JOTAI, TEHSIL, DISTRICT MUZAFFARGARH, IS AGAINST THE LAW, FACTS, RULES, PROCEDURE PRINCIPLES AND PROVISIONS AS WELL AS SECTION LAID DOWN IN THE DELIMITATION ACT 2017.
4. THAT, THERE IS GROSS VIOLATION OF LAWS RULES, PRINCIPLES AND SECTIONS OF DELIMITATION RULES 2017.
5. THAT, THE DELIMITATION OF PP-278, OF JOTAI, TEHSIL & DISTRICT, MUZAFFAGARH, PP-279, JOTAI, TEHSIL MUZAFFAGARH, PP-277 TEHSIL, ALIPUR , DIST. MUZAFFARGRAH IS LIABLE TO BE RECTIFIED TO THE EXTENT OF PRAYER OF THE PETITIONER TO MEET THE ENDS OF JUSTICE AND TO BE IN ACCORDANCE WITH THE RULE PROVISIONS, LAWS, SECTION LAID DOWN IN THE DELIMITATION ACT 2017.
6. THAT, THE PRELIMINARY PROPOSAL IS IN SHEER VIOLATION OF THE STATUARY PRINCIPAL OF DELIMIATION AS ENSHRINED IN SECTION 20 OF THE ACT THE PRINCIPLES ALONG WITH CATENA OF DICTUMS LAID DOWN BY THE SUPERIOR COURTS OF THE COUNTRY, THUS IT IS DEEMED NECESSARY TO AMEND/ ALTER CHARGE THE PRELIMINARY PROPOSAL FOLLOWS.

GROUND FOR PROPOSAL

1. THAT, THE "PC" KOTLA SULTAN SHAH "QH" OF DAMAR WALI SHUMALI POPULATION 13523 SHOULD BE INCLUDED IN PP-278 OF TEHSIL JATOI DISTRICT MUZAFFARGARH BECAUSE OF IT QH" DAMARWALI SHUMALI MOSTLY "PC" ARE ALREADY INCLUDED IN PP 278 IS MOST CLOSE AND GEOPGRAPHICALLY COMPACT AREAS HAVING PHYSICAL FEATURES WITH EXISTING BOUNDARIES AND ADMINISTRATION UNITS FACILITIES OF COMMUNICATION AS WELL AS PUBLIC CONVENIENCE WITH THE CONSTITUENCY OF PP-278, POPULATION AND HOUSEHOLD DETAIL, FROM BLOCK TO DISTRICT LEVEL IS ANNEXED B
2. THAT, THE UNION CONCEL HEAD BAKAENI IS ALSO A PART OF PP-278, AND PC" KOTLA SULTAN SHAH IS MAJOUR PART OF UC HEAD BAKAENI.
3. THAT, THE "PC" SABAYA WALA "QH" OF JOTAI PP 278 POPULATION 21046 SHOULD BE EXCLUDED FROM PP 278 JATOI AND SAID "PC" SHOULD BE INCLUDED PP 277 ALIPUR TEHSIL WHICH IS MORE CONVENIENCE AND HELPFUL FOR THE PEOPLE OF "PC" SABAYA WALA, DISTRICT POPULATION AND HOUSE HOLD DETAIL BLOCK TEHSIL AND DISTRICT LEVEL MUZAFFARGARH ANNEXED C

- 4. THAT, THE "PC" WAINS "QH" JHALARIN PP277 POPULATION 14413 SHOULD BE EXCLUDED FROM PP 277 AND SHOULD BE INCLUDED IN TO 279 WHICH IS MORE CONVENIENCE ADMINISTRATIVE HELPFUL FOR THE PEOPLE OF 279 OF TEHSIL JOTAI DISTRICT MUZAFFARGARH
- 5. THAT,THE HONORABLE ELECTION COMMISSION OF PAKISTAN (ECP) PLEASD TO RECTIFI ABOVE MENTION PERPOSAL THE POPULATION OF PP 277,PP 278, PP 279 WILL BE NOT EFFECTED IN ACCORDANCE WITH THE DELIMITATION ACT 2017, PROPOSED DRAFED IS ANNEXED D
- 6. THAT,THE EXISTENCE AND SHAPE OF TEHSIL BOUNDRIES OF TEHSIL JATOI DISTRICT MUZAFFARGARH, ARE FROM NORTH TO SOUTH AND ITS ALL SOURCES OF COMMUNICATIONS AS WELL AS ADMINISTRATIVE UNITS FROM NORTH TO SOUTH WHICH IS JUST NATURAL AND FEASIBLE BUT UNFORTUNATELY,THE PRESENT SHAPE AND FORM OF PRELIMINARY DELIMITATION OF PP 278 JATOI FROM EAST TO WEST WHICH IS A GROSS VIOLATION OF FUNDAMANTAL PRINCIPAL GOLDEN RULES PROVISIONS AND LAWS OF THE DELIMITATION ACT 2017

PRAYER

IN THE CIRCUMSTANCES, IT IS HUMBLY PRAYED THAT BY ACCEPTING THIS OBJECTION PETITION OF PP278 "PC" KOTLA SULTAN SHAH "QH" DAMAR WALA SHUMALI WITH POPULATION 13523 BE INCLUDED AND "PC" SABAYA WALA "QH" JOTAI 21046 BE EXCLUDED FROM PP-278

ANY OTHER APPROPRIATE RELIEF WHICH THIS HONOURABLE COURT DEEMS FIT AND PROPER IN THE CIRCUMSTANCES OF THE CASE MAY ALSO BE AWARDED.

PETITIONER IN PERSON

Jain