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BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

Mise. Petition No _____/2018

REPRESENTATION / OBJECTION PETITION ON
THE DRAFT PROPOSAL OF LAYYAH PP 280 AND 281
UNDER RULE 12 OF THE ELECTION ACT 2017

Respectfully Sheweth:

1. That the petitioner namely Hazoor Baksh S/O Ahmed Baksh R/O Mouza Wadeh Wali P/O Marahan Wali Tehsil Karor Distt. Layyah and is registered voter of mouza Wadeh Wali PP 281 Layyah at Serial No.450 Block code 233040603 copy of voter list is attached as Annexure "A"
2. The learned delimitation committee has excluded Patwar Circle Wadhewaly from newly numbered PP280 (old PP262) and included the same Patwar circle into PP281 without any justification because population of PP280 is already less than PP281 which is against the law fact and present situation/ location of area.
3. That Patwar Circle Wadehy Wali has been part of old PP 262 (Now PP 280) since long time. According to census its population is just 6487. In the proposed plan of constituencies already population of PP 280 is less than the population of PP 281 hence it will be more appropriate and realistic that Patwar circle Wadhey Wali may kindly be allowed to remain in its same constituency where it was already situated i.e. PP 280, it will not affect the population criteria.
4. That Karor city (municipal committee) is Tehsil Head quarter of PP 280 (new) which is at a distance of about 10 km from the center of Patwar circile Wadehy Wali and is much nearer hence proprietary and convenience of public demand that it should be included into PP 280.
5. That it is suitable for the population of Patwar circle Wadehy Wali to include it into PP 280.
6. That Earlier population of PP 280 is 365795 and PP 281 is 374939 and by excluding patwar circle Wadehy Wali from PP 281 and by including it into PP 280 the difference between the population of both constituencies will be very less and population of both constituencies will be almost equal.
7. That keeping in view geographical situation of the area it is in convenience of the local residence of the area that patwar circle Wadehy Wali should be included into PP 280 Layyah-I.
8. That the principles as laid down in section 20 of Election act are as under.

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- I) Distribution of population is in geographically compact areas.
 - II) Existing boundaries of administrative units
 - III) Facilities of communication.
 - IV) Public convenience.
 - V) Other cogent factors to ensure homogeneity.

But these principles were ignored and were not kept in the mind by the learned delimitation committee while issuing the preliminary notification in this regard about the constituencies of district Layyah.

9. That the constituency of PP 280 LY-I may be consist upon.

Proposal for PP-280

Sr.#	Qanoongoi	Patwar Circle	Population
1	Karor Nashaib	PC Wadehy Wali	6487
Population of PP 280		= 365795	
Population of PC Wadehy Wali		= 6487	

TOTAL		= 372282	

Note: Whereas population of 281 is 374939



10. That the objections are being field within time. The affidavit in support of ground is also attached here with and the requisite copies as well as map as required under law and relevant rules are also attached.

It is therefore most respectfully prayed that the representation / objection my kindly be accepted and Patwar Circle Wadehy Wali may kindly be excluded from PP 281 layyah-II and be included into PP 280 LY-I in the best interest of justice and proposed map of both the constituencies be also accepted.


 Petitioner