

To,

Worthy Secretary Election Commission Of
Pakistan, Islamabad

Subject: PRESENTATION OF THE OBJECTION PETITION.

Respectfully Sheweth:

1. That the synopsis of the instant petition is that the petitioner is the resident of Chak No. 102/ML, Tehsil Karor District Layyah and also the registered voter in the PP-280 of Tehsil Karor Lal Eason District Layyah. Attested Voter number of petitioner is as Annex A. NIC as Annex A/1
2. That the Delimitation committee constituted by Election Commission of Pakistan divided the District Layyah into Two National Assembly Constituencies as NA - 187 (Layyah - 1) and NA-188 (Layyah - 2) and consisting of five Provincial (Punjab Assembly) constituencies as PP-280, PP-281, PP-282, PP - 283, PP - 284 published the map of the said constituencies by way of issuance of new demarcation. Map of PP constituencies is as Annex B.
3. That the said committee constituted two PP Halqa No 280 and 281 comprising on Tehsil Karor by including one Qanoongoi of Tehsil Chaubarah No. 318 and the complete Qanoongoi namely Sumra Nashaib Layyah and three Patwar circle of Qanoongoi Mandi Town - 2 of Layyah. Said PP constituencies were made in violation of the settled principle as enshrine in section 20 of Election Commission Act - 2017 as well as section 10 of the Election Commission Rules 2017. So, following objections are raised on the said PP constituency No. 280 and PP No 281. So following objections are raised which are as under:-

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- i. That both the said constituencies PP - 280 and PP - 281 are comprising of 7,40,734 population, so both the constituencies would be divided on equal population as well as equal area but the said Delimitation Committee did not follow the principle as mentioned above.

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- j. That PP-280 constituency is consisting of A) Municipal Committee Karor Lal Eisan, B) Municipal Committee Fatehpur, Qanoongoi namely Maoj Garh, Qanoongoi Karor Thal Jandi, Qanoongoi Fatehpur, Qanoongoi Karor Nashaib (only two patwar circles namely Din Pur, Bsti Moosan Shah of Qanoongoi Karor Nashaib) and the same is consisting of total population as 3,65,795. In said constituency two cities namely Fatehpur Municipal Committee and Karor Laal Eisan Municipal Committee also two model police stations FAtchpur and Karor Laal Eisan have been included. The basic principal of constituting any constituency must be started from north to south clock wise but in the said constituency the same principal has not been applied but the said constituency was constituted from east to west which is against the principal laid down for constituting the constituency. The radiüs of constituency of 280 is 17 kilometers from north to ^{south} and 50 kilometers from east to west. While constituency PP-281 is constituted in T-Shape, upper part of the "T" part consisted of a strip along with Indus river and touches to MC Layyah which is consisted of patwar circle Din pur and Basti Moosan Shah of Qanoongoi Karor Nashaib and Qanoongoi Shahpur and three Patwar Circles namely 117/TDA, 120/TDA and 128/TDA of Qanoongoi Mandi Town Layyah-2 and the radios of this strip is 20 kilometers from east to west and 40 kilometers from north to west approximately and lower part of the said "T" of constituency is a strip consisting of 65 kilometers from east to west approximately in length and 15 kilometers from north to west approximately in width. Some portion of Shahpur Qanoongoi and 306 Qanoongoi and qanoongoid No.318 of Tehsil Chaubarah are included in this strip of lower part of "T" part of the constituency, resultantly, the radios of constituency is 85 kilometers in length approximately from east to west and the constituency is consistence of two separate portions.
- k. That it is very important to mention here that no city, no town and no police station headquarter and no municipal corporation has been included in this constituency. Area of this constituency is consisting of 3 Tehsils namely Tehsil Karor Laal Eisan, Tehsil Layyah and

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Tehsil Chaubarah. The constituency PP-281 touches very closely to the three municipal committee i.e. Karor Laal Eisan, Fatehpur and Layyah but no municipal committee is included in this constituency.

That the above-said constituency has not been constituted in the light of section 20 of the Election Commission Act-2017 as well as the section 10 of the Election Commission Rules of 2017. Section 20 of the Election Commission Act-2017 is reproduced as under:

"Principles of delimitation: ---(1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into the constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.

Section 10 of Election Commission Rules is also reproduced as under:

Draft proposals for delimitation of constituencies.---(1) A delimitation committee constituted under rule 9 shall, immediately after its constitution, proceed to obtain from Pakistan Bureau of Statistics, population data of last census officially published along with relevant maps showing therein census charges, census circles and census

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blocks along with description, relating to a Province, an agency, or any other administrative or revenue unit as it may require.

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(2) The Delimitation Committee Shall also obtain district maps along with description, duly authenticated by Pakistan Bureau of Statistics, or as the case may be, the district head of Revenue Department, prepared on a uniform scale as may be determined by the Commission indicating therein details of all administrative and revenue units in the district to the level of a Patwar Circle or as the case may be, a Tapedar Circle, as well as prominent geographical and physical features, such as rivers and mountains and any other information as may be determined by the Commissioner or required by the Committee.

(3) In preparing draft proposals for delimitation of constituencies, the delimitation committee shall follow the principles of delimitation as laid down in section 20, procedure given in this chapter and guidelines provided by the Commission from time to time.

(4) The constituency for an Assembly shall not ordinarily extend to more than one district except in exceptional circumstances for reasons to be recorded by the Delimitation Committee.

Provided that a patwar circle or, as the case may be, a Tapedar Circle shall be the basic unit for delimitation and it shall not be broken under any circumstances.

Provided further that in case of urban areas census circle shall not be broken under any circumstances.

(5) As far as possible, the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or as the case may be, the agency and then

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proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota; provided that the quota under this sub-rule shall be determined by dividing total population off the district or the agency with number of seats allocated to that district or agency:

Provided further that the variation in population between two or more constituencies shall not ordinarily exceed ten percent and the Delimitation Committee shall record reasons, if in exceptional circumstances, the variation has to exceed the limit.

(6) For the purpose of preparation or draft proposals for delimitation, the delimitation committee may require assistance from any Federal, Provincial or, as the case may be, a local government authority.

(7) After the draft proposals for delimitation of constituencies are finalized on Form-5, the Delimitation Committee shall send the same to the Commission, within the time specified and in the manner as may be determined by the commission.

So, keeping in view the above-mentioned Election Commission Act and Election Commission Rules, each constituency may be prepared from North to South clockwise zigzag manner, having each constituency one municipal committee, one police station headquarter, one notable city and equal population in accordance with required rules and regulations as well as natural ground reality and according to the equal radius distance of each constituency.

5. That the draft of the proposal for the delimitation of the constituency PP-280 would be comprising of municipal committee Fatehpur, same having the headquarter police station and the same is also adjacent to the qanoongi 318 of Tehsil Chaubarah. So, the

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Following table of qanoongoi and patwar circle would come on service which is given as under Halqa PP 280.

Sr. No.	Qanoongoi	Patwar Circle	Population
1	Moaj Garh	All Patwar Circles	64375
2	Fatehpur	All Patwar Circles	52036
3	MC Fatehpur	-----	44103
4	Chak No 306/TDA	All Patwar Circles	45325
5	Jharkal	Following Patwar Circles: 88/ML 86/ML 83/ML 88/TDA 83B/TDA 79C/TDA Buchi Wali	5377 7085 6532 3811 12648 13207 14331 62991
6	Thaljandi Karor	Following Pawar Circles 84/TDA 90/TDA 96/TDA 98/ML 94/TDA	7553 4253 8640 13201 6328 39975
7	Shah Pur	103/TDA	11746
8	318 of Tehsil Chaubarah	All Patwar Circles	44824
		Total Population	365376

Following table of qanoongoi and patwar circle would come on service which is given as under Halqa PP 281.

Sr. No.	Qanoongoi	Patwar Circle	Population
1	MC Karor Lal Eason	-----	35267
2	Karor Nashaib	All Patwar Circles	98507
3	Jharkal	Following Patwar Circles a. Tibi Khurad Nashaib b. Marahanwali	16366
4	Thal Jandi	Following Patwar Circles a. Karor Thalljandi b. Sargani Thall c. 102/TDA	32821
5	Shah pur	All Patwar Circles except PC 103/TDA	83180
6	Sumra Nashaib Layyah	All Patwar Circles	70862
7	Mandi Town No 2 Layyah	Following Patwar Circles a. 117/TDA b. 120/TDA c. 128/TDA	30709
		Total Population	367708

Proposed Map of the constituency PP - 280 & PP - 281 attached which is prepared in the light of the section 20 of

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the Election Commission Act - 2017 as well as section 10 of
the Election Commission Rules - 2017

6. That the proposed map shows approximately equal population, area, radius distance, notable cities, roads, police stations, width and length of the area of the constituency as well as the suitable approach to the central place of the constituency.
7. That the objection petition is being filed before the authority / secretary election commission within time.

Pray:

In view of the afore - said submissions and discussions, it is humbly prayed this representation / objection petition may very kindly be graced with acceptance and both Delimiting Constituencies PP - 280 & PP - 281 may kindly be approved as per proposed by the petitioner according to map as attached with for the supreme interest of justice.

..... Humble Petitioner.....

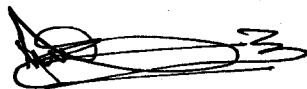
Dated 27-03-2018

Niaz Muhammad S/O Noor Din

R/O Chak No 102/TDA Qanoongoi
Thaljandi Patwar Circle 98/ML
Tehsil Karor District Layyah.

Serial Vote No. 327

NIC 322022539049-1



Through

Ch. Hafeez Ullah Advocate Sub Divisional courts Karor

