

To,

Worthy Secretary Election Commission Of Pakistan,
Islamabad

Subject: PRESENTATION OF THE OBJECTION PETITION PP-281

Respectfully Sheweth:

1. That the synopsis of the instant petition is that the petitioner is citizen of Pakistan and resident of Moza Wara Sehran of Tehsil Karor District Layyah and also the registered voter in the PP-281 of Tehsil Karor Lal Eason District Layyah. Copy of NIC is attached as Annex A. Attested Voter number of petitioner is as Annex B.
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 C.
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/^{HTDA} 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:-

OBJECTIONS



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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.
- ii. According to Delimitation Committee constituted by Election Commission of Pakistan following Qanoongoi's and Patwar Circles are included in Constituencies to PP-280 and 281 are as under:-
1. **PP-280**
 - a. Municipal Committee Karor Lal Eason
 - b. Municipal Committtee Fatehpur
 - c. Two Patwar Circles 1. Din Pur 2. Basti Mosan Shah of Qanoongoi Karor Nashaib.
 - d. Qanoongoi Mojgarh
 - e. Qanoongoi Thaljandi
 - f. Qanoongoi Jharkal
 - g. Qanoongoi Fatehpur
 2. **PP - 281**
 - a. Following HQ's of Karor Lal Eason Tehsil
 1. Shahpur Thall
 2. Chak No 306/TDA
 3. Qanoongoi Karor Nashaib accept Patwar Circle
1.Din pur 2. Bati Mosan Shah
 4. Qanoongoi 318 of Tehsil Chaubarah
 5. Qanoongoi Sumra Nashaib of Tehsil Layyah
 6. Patwar Circles 117.TDA, 120/TDA, 128/TDA of Qanoongoi Mandi Town II of Tehsil Layyah
- iii. The learned Delimitation Committee of Election Commission did not follow the manner and laws lay down in section 20 of Election Commission Act - 2017 and Section 10 of Election Commission Rules -2017 while constituting Halqa PP-281. The said committee includes Qanoongoi 318 of Tehsil Chaubarah, one portion of said Qanoongoi consisting of Patwar circles Nosahra Thall Kalan Shumali and Patwar Circle 303/TDA is

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very adjacent to MC Fatehpur of Constituency^{PP}-280, similarly the said learned committee excluded two patwar circles namely Din Pur and Basti Mosan Shah of Qanoongoi Karor Nashaib which creates a dent in constituency^{PP}-281 and also patwar circle 105/TDA of Qanoongoi Shah pur is included in said Halqa^{PP}-281 which is quietly misappropriate and makes the constituency disshape. If all the above said patwar circles of Qanoongoi 318, patwar circles 105/TDA of Qanoongoi Shahpur are excluded from constituency PP 281 and same would be included in constituency PP-280 and substitute Two Patwar circles namely Din Pur and Basti Mosan Shah be included in constituency^{PP}-281. Patwar Circle namely Kotla Haji Shah of Qanoongoi Sumra Nashaib Layyah is very close and adjacent to big city Layyah which is also Muncipal Committee, that very patwar Circle is misappropriate with constituency^{PP}-281 and it may be included in constituency PP - 281 of city Tehsil Layyah.

- iv. That it is very important to mention here that no big city is included in constituency^{PP}-281, same is constituted within the area of Three Tehsil's. (i) Half area of Karor Lal Eason (ii) one Qanoongoi of Tehsil Chaubarah and (iii) one complete Qanoongoi and three patwar circles of another Qanoongoi of Tehsil Layyah, and Two patwar circles of Qanoongoi 318 of Tehsil Chaubarah and one patwar circle of Qanoongoi Sumra Nashaib of Tehsil Layyah are unnecessarily has been attached with constituency PP - 281 to complete the radius of said constituency which is against the manners and principals lay down by the act and rules of Election Commission of Pakistan.
- v. 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

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

(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

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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.

(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 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

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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 to 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. PP-280

PP-281 may be prepared from north to South Clock wise zigzag manner having each constituency equal population in accordance with required rules and regulations as well as natural ground reality.

That the draft of the proposal for the Delimitation of constituency would be comprising of: PP-281

- a. Karor Nashaib Qanoongoi
- b. Shahpur Qanoongoi accept Patwar Circle 105/TDA
- c. Sumra Nashaib Qanoongoi accept Patwar Circle Kotla Haji Shah
- d. 306/TDA
- e. Patwar Circles 117,120 and 128 of Qanoongoi Mandi Town to Layyah
- f. Qanoongoi 318 of Tehsil Chaubarah accept Patwar Circles 303/TDA and Noshara Thall Kalan Shumali.

So the 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	Karor Nashaib	All Patwar Circles	106453
2	Shahpur	All Patwar Circles accept the patwar circle 105/TDA	83808
3	Sumra Nashaib Layyah	All Patwar Circles accept Patwar Circle Kotla Haji Shah	65000
4	306/TDA	All Patwar Circles	45325
5	Mandi Town II of Layyah	Following Patwar Circles: 117/TDA 120/TDA 128/TDA	30782
6	318/TDA of Tehsil Chaubarah	All Patwar circles accept Patwar Circle Nosahra Thall Kalan Shumali and 303/TDA	31427
		Total Population	362796

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	MC Karor Lal Eason	-----	35267
2	MC Fatehpur	-----	44103
3	Jharkal	All Patwar Circles	79357
4	Mojgarh	a. All Patwar Circles	64375
5	Thall jandi	All Patwar Circles	72796
6	Fatehpur	All Patwar Circles	52036
7	318/TDA of Chaubarah	Following Patwar Circles a. Nosahra Thall Kalan Shumali b. Chak No 303/TDA	13397
8	Shapur	Following Patwar Circles. a. 105/TDA	11118
		Total Population	372449

Proposed Map of the constituency PP - 280 & PP - 281 attached which is prepared in the light of the section 20 of the Election Commission Act - 2017 as well as section 10 of the Election Commission Rules - 2017. Purposed Map is as Annex D.

Handwritten note: P. No. 28/30/2018

- 6. That the proposed map shows approximately equal population, area, radius distance, 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

Shahab Ud Din Khan S/O Behram Khan

R/O Mouza Wara Sehran Tehsil Karor District Layyah.

Vote No. 397

NIC: 32202-6407808-7

PH #: 0346-4990904



Through

Ch. Hafeez Ullah Mongit Advocate

