

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 Nasarullah Khan S/O Ellahi Bukhsh caste Bhand Blouch R/O Nashaib Karor Tehsil Karor Distt. Layyah and is registered voter of mouza Karor Nashaib Pati Baha-ud-Din PP 281 Layyah at Serial No.271 Block code 233040205 copy of voter list is attached as Annexure "A"
2. That the learned delimitation committee have included some portion of patwar circle Karor Nashaib pati Baha-ud-Din and Pati Yousaf into PP 281 Layyah-II which is against the law fact and present geographical situation / location of the area.
3. That Patwar Circle Karor Nashaib pati Baha-ud-Din and Pati Yousaf has been wrongly included into PP 281. According to census population of Karor Nashaib pati Baha-ud-Din is 8563 and Pati Yousaf is 10661. In the proposed plan of constituencies already population of PP 280 is less than the population of PP 281 hence by inclusion of Patwar circle Karor Nashaib pati Baha-ud-Din and Pati Yousaf into PP 280, it will not widely affect the population criteria.
4. That Karor city (municipal committee) is Tehsil Head quarter of PP 280. Patwar circle Karor Nashaib pati Baha-ud-Din and Pati Yousaf are adjacent to tehsil headquarter Karor and MC Karor city which is situated in PP280. It will be homogeneous and more symmetrical that these two Patwar Circles of Karor Nasheb be included in PP280. Their inclusion will not affect too much population.
5. That it is suitable for the population of Patwar circle Karor Nashaib pati Baha-ud-Din and Pati Yousaf 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 Karor Nashaib pati Baha-ud-Din and Pati Yousaf from PP 281 and by including it into PP 280 the difference between the population of both constituencies will be very minute 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 residents of the area that patwar circle Karor Nashaib pati Baha-ud-Din and Pati Yousaf should be included into PP 280 Layyah-I.
8. That Union Council Karor Thal Jandi is comprise of Karor Thal Jandi and Karor Nasheb Patwar circles pati Baha-ud-Din and Pati Yousaf. In result of delimitation, Union Council could not remain compact and has been bipharcated into two constituencies

PP280 and PP281 which is inconvenient for public at large. It would be more appropriate, realistic and rational that it would be included in PP280 which will not majorly affect population requirement and it will be a facilitation for people of locality.

9. That it is most important that some portion of Urban area of municipal committee Karor comprising upon Ward No. 12 & 13 is situated within the limits of Karor Nashaib pati Baha-ud-Din and Pati Yousaf which is also crystal clear from the map of Distt. Layyah.
10. That Patwar Circle Wadehy Wali has been component of old PP 262 (Now PP 280) since long time. Even in newly proposed delimitation, the said Patwar Circle is adjacent to PP 280. According to census the population of PC Wadhewaaly is just 6487. 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.
11. That the principles as laid down in section 20 of Election act are as under.

- 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.

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

Proposal for PP-280

Sr.#	Qanoongoi	Patwar Circle	Population
1	MC Karor Lal-Eason		35267
2	MC Fateh Pur		44103
3	Jharkal		79357
4	Maujgarh		64375
5	Karor Thal Jandi		72796
6	Fateh Pur		52036
7	Karor Nashaib	PC Din Pur	9913
		PC Mosan Shah	7948
		PC Pati Bahau-ud-Din Karor Nashaib-II	8563
		PC Pati Yousaf Karor Nashaib-I	10661

		PC Wadehy Wali Karor Nashaib	6487
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13. That the constituency Layyah-II PP 281 may be consist upon.

Proposal for PP-281

Sr.#	Qanoongoi	Patwar Circle	Population
1	Shah Pur Thal		94926
2	Chak No.306/TDA		45326
3	Chak No.318/TDA of Chubara Tehsil		44824
4	Sumra Nashaib of Layyah Tehsil		70862
7	Karor Nashaib	Except Following PCs 1. PC Din Pur 2. PC Mosan Shah 3. PC Pati Bahau-ud-Din Karor Nashaib 4. PC Pati Yousaf Karor Nashaib 5. PC Wadehy Wali Karor Nashaib	62881
8	Mandi Town-II	Following PCs a) 117/TDA b) 120/TDA c) 128TDA	30409

14. 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 Karor Nashaib pati Baha-ud-Din and Pati Yousaf may kindly be excluded from PP 281 Layyah-II and be included into PP 280 LY-I in the best interest of justice and map of both the constituencies be also accepted.

Petitioner