

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 Chak No 258/TDA 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 learned 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 PP Halqa No 280 and PP 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 and also constituted PP-282 consisted of Tehsil Chaubarah except Qanoongoi

318/TDA and included MC Chowk Azam and Qanoongoi 280/TDA of Tehsil Chaubarah. Said PP constituencies were made in violation of the settled principle as enshrined 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 and PP - 282. So following objections are raised which are as under:-

OBJECTIONS

- i. That the said constituencies PP - 280 and PP - 281 are constituted comprising of complete population of Tehsil Karor, One Qanoongoi of Tehsil Layyah namely Sumra Nashaib and three Patwar Circles of an other Qanoongoi Mandi Town - II Layyah are included to complete the population and area of said PP constituencies PP 280 & PP 281. Unnecessarily and against the manners and laws laid down in Election Commission Act and Rules 2017 one Qanoongoi of Tehsil Chaubarah is included which created an unnatural dent in whole Tehsil Chaubarah.
- ii. That while Delimiting the constituencies PP - 282 one Qanoongoi of Tehsil Chaubarah 318/TDA is deducted unnecessarily and to complete the population of PP - 282 MC Chowk Azam and complete Qanoongoi 280/TDA is included unnaturally.
- iii. That the petitioner is resident of Qanoongoi 306/TDA of Tehsil Karor which is very adjacent to MC Fatehpur from north side and also very adjacent to Qanoongoi 280/TDA on South. To

- constitute PP - 281 learned Delimitation Committee has already included some portion of Tehsil Layyah (Qanoongoi Sumra Nashaib and Three Patwar Circles of Qanoongoi Mandi Town - II of Tehsil Layyah), there is no need to encroach unnecessarily in Tehsil Chaubarah while including Qanoongoi 318/TDA. It was very natural if the learned Delimitation Committee would include only four patwar Circle of Qanoongoi 280/TDA, PC 280/TDA , PC 282/TDA, PC 277/TDA and PC 332/TDA of Tehsil Layyah which is very adjacent to Qanoongoi 306/TDA of Tehsil Karor Lal Eason rather to include the population of Qanoongoi 318/TDA of Tehsil Chaubarah.
- iv. So both the constituencies PP - 280 and PP - 281 can be constituted comprising Complete Tehsil Karor and <sup>Some</sup> ~~sub~~ portion of Tehsil Layyah, there is no need even to touch Tehsil Chaubarah at all.
- v. That while constituting PP - 282 it may be comprising on whole Tehsil Chaubarah, similarly MC Chowk Azam and Qanoongoi 280/TDA except four patwar circles, Which learned delimiting committee has already constituted the same constituency PP - 282 and unnecessarily excluded Qanoongoi 318/TDA in substitution of only four Patwar Circles of Qanoongio 280/TDA of Tehsil Layyah.
- vi. That the formula adopted by the learned Delimiting Committee while constituting the PP - 280 , PP - 281 and PP - 282 disshaped all the three Constituencies and constituted the same against the facts and geographical and ground realities of

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the area but the said Delimitation Committee did not follow the principle as mentioned <sup>in law</sup> ~~above~~.

vii. According to Delimitation Committee constituted by Election Commission of Pakistan following Qanoongoi's and Patwar Circles are included in Constituencies to PP-280, PP -281 and PP - 282 are as under:-

**1. PP-280**

- a. Municipal Committee Karor Lal Eason
- b. Municipal Committee 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 except 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

**3. PP - 282**

- a. Chaubara Tehsil excluding Qanoongoi 318/TDA
- b. Chowk Azam MC
- c. Halqa 280/TDA of Tehsil Layyah

**Proposal**

viii. 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-280, PP - 281 and PP - 282. While delimiting PP - 280 the said committee did not follow the principle from north to south clock wise and with zig zag manners and constituting PP - 280 east to west including two MC's Fatehpur and MC Karor Lal Eason and two model police station and cities. Similarly while delimiting the constituencies PP - 281 the said learned Delimiting Committee constituted said PP Halqa as T Shape, consisting of two different portions, one portion north to west Parallel to Indus river and the second portion of T <sup>of</sup> the constituency PP - 281 is east to west and no note able city, any police station and any Municipal Committee or any notable town is included in the same constituency, which is absolutely against the manners and laws enshrined in the Section 20 of Election Commission Act 2017 and section 10 of Election Commission Rules 2017.

Similarly the learned Delimitation Committee while constituting PP - 282 unnecessarily excluded Qanoongoi 318 of Tehsil Chaubarah from Tehsil Chaubarah and did not follow the laws mentioned above.

- ix. That it is very important to mention here that no big city is included in constituency 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. If PP - 281 may be constituted by including MC

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Karor Lal Eason, Qanoongoi Karor Nashaib, and Two patwar circles of Qanoongoi Jharkal, four Patwar Circles of Qanoongoi Karor Thalljandi, Qanoongoi Shahpur and portion of Tehsil Layyah consist of qanoongoi Sumra Nashaib and three Patwar circles of Mandi Town - II, then this constituency 281 may be very ideal and according to the laws lay down in act and rules of Election Commission from north to south.

Similarly PP - 280 can be constituted comprising on one MC Fatehpur Qanoongoi 306/TDA, Qanoongoi Thalljandi (except three patwar circles), Qanoongoi Jharkal (except two patwar circles), Qanoongoi Fatehpur and Qanoongoi Mojgarh of Tehsil Karor Lal Eason and only four Patwar Circles of Qanoongoi 280/TDA from Tehsil Layyah, it will also make a very plausible according to law and according to ground realities.

- x. 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.

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(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 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



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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 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 may be prepared from north to South Clock wise zigzag manner having each constituency equal population in

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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 except Patwar Circle 103/TDA
- c. Sumra Nashaib Qanoongoi
- d. Patwar Circles 117,120 and 128 of Qanoongoi Mandi Town to Layyah
- e. MC Karor Lal Eason
- f. Patwar Circles of Karor Thalljandi
  - 1. Sargani Thall
  - 2. 102/TDA
  - 3. Karor Thalljandi

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 except the patwar circle 103/TDA	83808
3	Sumra Nashaib Layyah	All Patwar Circles except Patwar Circle Kotla Haji Shah	65000
4	Jharkal	Tibi Khurad Buchi Wala	19978
5	Mandi Town II of Layyah	Following Patwar Circles: 117/TDA 120/TDA 128/TDA	30782
6	Shahpur	All Patwar circles except Patwar Circle 103/TDA	83180
7	Karor Thaljandi	Sargani Thall Karor Thalljandi 102/TDA	32821
		Total Population	371708

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 Fatehpur	-----	44103
2	Fatehpur	All Patwar Circles	52036
3	Jharkal	All Patwar Circles except i. Tibi Khurad Nashaib ii. Buchi Wala	66603
4	Mojgarh	All Patwar Circles	64375
5	Thall jandi	All Patwar Circles except patwar circle i. Sargani thal ii. Karor Thaljandi iii. 102/TDA	39975
6	280/TDA of Tehsil Layyah	Following Patwar Circles i. 280/TDA ii. 282/TDA iii. 277/TDA iv. 332/TDA	41124
8	Shapur	Following Patwar Circles. a. 103/TDA	11118
		Total Population	365376

Following table of qanoongoi and patwar circle would come on service which is given as under Halqa PP 282.

Sr. No.	Qanoongoi	Patwar Circle	Population
1	Tehsil Chaubarah All Qanoongois	All Patwar Circles of each Qanoongoi	252200
2	MC Chowk Azam	-----	67499
3	280/TDA	All Patwar Circles except i. 280/TDA ii. 282/TDA iii. 277/TDA iv. 332/TDA	39863
		Total population	359562

Proposed Map of the constituency PP - 280 & PP - 281 and PP - 282 is 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.**

6. That the proposed map shows approximately equal population, area, radius distance, notable cities, police stations, prominent roads and 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 exception and both Delimiting Constituencies PP - 280 & PP - 281 and PP - 282 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 3-4-2018

Muhammad Ameen S/O Rehmat Ali R/O  
Chak No 258/TDA of Tehsil Karor District  
Layyah.

S.R/Vote No. 46

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*محمد امین*

Through

~~Ch. Hafeez Ullah Mongit Advocate~~

*TAJ W MAHMUD ALI ADV.*

*HIGH COURT*

*CC No. 7970.*

*[Signature]*