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BEFORE THE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD

Mumtaz Ahmad Khan Bhutto son of Faiz Mohammad Khan,
Qaiserani, resident of Kot Qaiserani, Tehsil Taunsa Sharif, District
D.G Khan.

PETITIONER

VERSUS

Election Commission of Pakistan, Islamabad.

RESPONDENT

OBJECTION PETITION AGAINST THE
DELIMITATION OF CONSTITUENCY PP-
285 TAUNSA SHARIF, DISTRICT D.G
KHAN, IN WHICH THE QANOONGOI
CIRCLE ADDITIONAL NARI HAVE BEEN
WRONGLY INCLUDED IN PP-285
WITHOUT FACTS, WHICH IS AGAINST
SECTION 20 OF DELIMITATION ACT,
2017.

Respectfully Sheweth,

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1. That the brief facts of the case giving rise to the filing of instant objection petition are precisely submitted that the petitioner is resident of Kot Qaiserani, Tehsil Taunsa Sharif, District D.G Khan having Serial No.362 of Union Council Kot Qaiserani, Tehsil Taunsa Sharif, District D.G Khan which falls in the constituency PP-285. Copy of serial number is being appended herewith as **Annex A**.
2. That according to the power envisaged through Election Act, 2017 under section 17, the respondent has delimited the constituency of the residents of the petitioner without any legal justification and without any reasoning, which are objected inter alia on the following: -

GROUND

- a. That according to the section 20 of the Election Act, 2017, it is very much clear that the delimitation would be performed keeping in view of the geographical compact area, physical features, existing boundaries of administrative units, facilities of communications and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies. The Learned Commission has not recorded any good reason in writing about the delimitation of the constituency PP-285 and has changed the whole map

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of the constituency PP-285, thus affecting the whole picture of the constituency. Such act of the Commission is illegal and without any fact to establish the fact that such delimitation was necessary for the welfare of the voters of the concerned constituency. Copy of map is being appended herewith as Annex B.

- b. That it is very also important to mention here that Qanoongoi Circle Nari is natural and integral part of PP-285, but due to the impugned act of the respondent, the inclusion of Qanoongoi Circle Additional Nari has become an unnatural extension of PP-285, which would affect the welfare of the voters in the long future. Copy of highlighted area showing Qanoongoi Circle Additional Nari as an extension is being appended herewith as Annex C.
- c. That instead of including of Qanoongoi Circle Additional Nari in PP-285 is a mistake done by the respondent. In fact, such changing were done in a mechanical manner without any reasoning, which has changed the whole maps of PP-285.
- d. That the impugned delimitation has changed the geographical compactness of the PP-285 and has also affected the physical compactness and such act has not been done keeping in view of the public convenience. Such act of the Election Commission of

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Pakistan is against the public tranquility and also against the dictum of natural justice.

e. That the impugned delimitation has not been performed in a clockwise manner, which is most important principle for performing the delimitation. Such act of the respondents also depicts that the impugned act of commission was performed in a stereo type manner and is liable to be set aside.

PRAYER: -

Under the above submissions, it is prayed that the instant objection petition may very kindly be accepted and Qanoongoi Circle Nari may very graciously be included in PP-285 and Qanoongoi Circle Additional Nari may very graciously be excluded from PP-285 in the supreme interest of justice.

Dated:

Through:

FAISAL MAHMOOD KHAN TANGWANI,
Advocate High Court,
Opp. High Court Building,
Multan.

PETITIONER

CERTIFICATE: -

As per instructions of my client it is first objection petition on the subject matter before this Hon'ble Court.

Advocate

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