

30/03/2018

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BEFORE THE WORTHY SECRETARY,
ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

OBJECTION PETITION / DELIMITATION NO. _____ / 2018

MUHAMMAD ISMAIL son of MEEVA KHAN Caste
BUZDAR, DAHR Tehsil D G KHAN CNIC No. 32101-
0803862-3.No. 0333-6464154 :

.....Petitioner

VERSUS

Election Commission of Pakistan, Islamabad

.....RESPONDENT

OBJECTION PETITION
REGARDING THE CONSTITUTNCY NO. PP-286 DISTRICT
D.G.KHAN FOR EXCLUSION OF AREA OF QHS BARTHI, FAZLA
KACHH, KHARAR BUZDAR OF TEHSIL D.G.KHAN TO INCLUSION
IN PP-287 AND EXCLUSION QHS OF MAKWAL KALAN /
ADDITIONAL MAKWAL KALAN FROM PP-287 INCLUSION TO PP-
286.

RESPECTFULLY SHEWETH:

1. That the petitioner is enrolled as a voter in the constituency PP 286 Dera Ghazi Khan having his voter No. 19 Mauza DAHR polling station DAHR. It is further mentioned that the petitioner wants to contest the election of Provincial Assembly from PP - 287, Tehsil D G KHAN, District D.G.Khan. It is further important to mention here that this Provincial constituency falls in the area of National Assembly constituency NA-190.

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2. That the preliminary delimitation of constituency has been published through Public Notice by the Election Commission of Pakistan in which objection against the preliminary delimitation has been invited till 3rd April 2018, therefore, the objection petition is within time.
3. That the total population of District D.G.Khan is 2872201 and 8 seats of Provincial Assembly are being under consideration to be constitute. Each seat of Provincial Assembly having his population 359025.
4. That the total population of Tehsil Taunsa Sharif is 675756 which shows that 45000 population further included in Tehsil Taunsa Sharif for the constitution of two Provincial Assembly seats.
5. That the Provincial seats of D.G.Khan District starts from PP - 285 to PP - 292. It is worth mentioning here that proposed population of PP - 285 is 365525, PP - 286 is 357634, PP - 287 is 353294, PP - 288 is 358903. PP - 289 is 399064, PP - 290 is 343450, PP - 291 is 349169 and PP - 292 is 345162.
6. That PP - 285 D.G.Khan having its population 365525 is proposed to be comprised of following areas of Tehsil Taunsa Sharif (1) Vehova, (2) Nutkani (3) Retra (4) additional Nari (5) QH of De-excluded area of D.G.Khan Tehsil (i) Bathi (ii) Phugla Shuamli. It is worth mentioning here that in the above said seat 2 tribal areas of District D.G.Khan in the shape of QHs has been included out of which the population of Bathi is 22967, whereas, population of Phugla Shumali is 24510. It is worth mentioning here that deficit of population in Tehsil Taunsa for the 2 seats of Provincial Assembly required was credited in the shape of above said QHs.

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7. That the other Provincial Assembly seat of District D.G.Khan PP - 286 which falls in area of Tehsil Taunsa Sharif but during the delimitation process two QHs namely Makwal Kalan and additional Makwal Kalan, was excluded from PP - 286 and these 2 QHs has been included in the Provincial Assembly seat PP - 287 of D.G.Khan Tehsil, whereas, 3 QHs of D.G.Khan Tehsil namely Barthi, Fazla Kachh and Kharar Buzdar has been included in PP - 286 of Tehsil Taunsa Sharif. It is worth mentioning here that total population of PP - 286 is 357634 in which population of Barthi is 44398, Kharar Buzdar is 28858 and population of Fazla Kachh is 28030. The total population of D.G.Khan Tehsil included in PP - 286 is 101286. If this population is excluded from PP - 286 then remaining population of PP - 286 will be 256348. On the other hand in PP - 287 D.G.Khan total population is 353294 in which population of QHs of Tehsil Taunsa namely Makwal Kalan having its population 53764, whereas, population of QHs of additional Makwal Kalan is 47596. If the population of above said two QHs of Taunsa Sharif which is 101360 excluded from PP - 287 the remaining population will be 251934.
8. That purpose of delimitation is to include the adjacent areas in the constituency, therefore, it is proposed that excluded area of D.G.Khan Tehsil QHs namely Barthi, Kharar Buzdar and Fazla Kachh having total population 101286 be excluded from PP - 286 and included in PP - 287, then total population of PP - 287 will be 353220, whereas, in the proposed scheme population of PP - 287 is 353294, deficit is only 74 persons, whereas, if the population of QHs Makwal Kala and additional Makwal Kalan of Tehsil Taunsa Sharif having its population 101360 be included in PP - 286 and excluded from PP - 287 then total population of PP - 286 will be

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357708 whereas, in the proposed scheme this population is proposed as 357634.

9. That the road approached to QHs of D.G.Khan Tehsil namely Barhi, Kharar Buzdar, Fazla Kachh is from D.G.Khan and distance will be approximately more than 150 Km. If this area is included in PP - 287 then this distance will be approximately 40 Km. Whereas, if the area of Makwal Kalan and additional Makwal Kalan be included in PP - 286, these area are adjacent to the other area of PP - 286 and distance will be not more than 25 Km.
10. That there is gross violation of laws, rules, principles and section of delimitation rules 2017.
11. That delimitation of PP - 286 and PP - 287 is liable to be rectified to extent of prayer of the petitioner to meet ends of Justice and to be in according with rules, provisions, laws, sections laid down in the Delimitation Act 2017.
12. That the delimitation of PP - 286 and PP - 287 D.G.Khan is liable to be rectified inter-alia on the following grounds.

GROUND.

- a) That if the proposed delimitation is appreciated and accepted there shall be no difference of population.
- b) That if the proposed delimitation in PP - 286 and PP - 287 of D.G.Khan District is appreciated and accepted then geographically, adjacent areas in compact block / units shall be emerged and people of both constituencies remained in the same area.

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- c) That QHs of D.G.Khan Tehsil which are included in Tehsil Taunsa in shape of PP - 286 then people as well as candidates aggrieved for the purpose of development and for the purpose of administration of work and the same situation create PP - 287.
- d) That Municipal Corporation Taunsa Sharif and administrative / Tehsil work of Taunsa Sharif disturb if the 2 QHs namely Makwal Kalan / additional Makwal Kalan excluded from PP - 286 and same situation lies with PP - 287.
- e) That QHs excluded from D.G.Khan Tehsil and included in PP - 286 namely Barthi, Fazla Kachh and Kharar Buzdar having their administration units in shape of AC, Tehsildar and Civil Courts of D.G.Khan whereas QHs of Tehsil Taunsa namely Makwal Kala and additional Makwal Kalan included in PP - 287 of Tehsil D.G.Khan having their administrative units in shape of AC / Tehsil and Civil Courts at Taunsa Sharif. Therefore this situation creates problems for the people of both constituencies and rectification prayed by the petitioner is genuine and very important to meet the end of Justice.
- f) That QH Nari is included in PP - 286 having its population 45038 but in the marked delimitation map Patwar Circle Bhambhan is excluded from PP - 286 included in PP - 285. It is worth mentioning here that population of above said QHs is completely included in PP - 286 moreover Patwar Circle Bhambhan is not to be mentioned as included in PP - 285 therefore this rectification is also needs your kind perusal.

PRAYER.

It is therefore prayed that this petition / proposal may kindly be accepted and excluded QHs of Tehsil Taunsa Sharif namely Makwal

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Kalan / additional Makwal Kalan from PP - 287 and to be included in PP - 286 whereas, 3 QHs of Tehsil D.G.Khan namely Barthi, Fazla Kachh and Kharar Buzdar be excluded from PP - 286 and included in PP - 287.

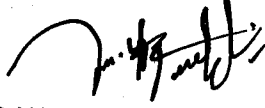
Any other appropriate relief which this Honorable Court deems fit and proper in the circumstances of the case may also be awarded.

محمد اسماعیل

PETITIONER THROUGH COUNSEL.

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Ph: No. 03466222255

CERTIFICATE.

Certified that this is the 1st: Objection Petition on the subject in this Honorable Court.

محمد اسماعیل
PETITIONER