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BEFORE THE WORTHY SECRETARY,
ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

Objection Petition / Delimitation No. _____/2018

Chandia
Nazeer Ahmad S/o Haji Wahid Bukhsh, Caste Buzdar, P/O Maat
Chandia, P/O Khas, (De-excluded Area), District D.G. Khan, CNIC #
32102-5678230-1 Cell: 03334622444

VERSUS

ELECTION COMMISSION OF PAKISTAN, ISLAMABAD.

OBJECTION PETITION

**REGARDING THE CONSTITUENCY NO. PP-286 DISTRICT D.G. KHAN
FOR EXCLUSION OF AREA OF QHS KHARAR BUZDAR OF DE-
EXCLUDED AREA DISTRICT D.G. KHAN, TO INCLUSION IN PP-287
AND EXCLUSION QHS MAKWAL KALAN, PATWAR CIRCLE (BINDI,
DARBHI, MAKWAL KALAN) FROM 287 TO INCLUDE IN 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. 204, Gharana No. 110, Patwar Halqa Sangas Maat, Poling Station *HA* H.S. Maat Chandia Census Block Code No. 226040602. It is further mentioned that the petitioner wants to contest the election of provincial assembly from PP-287 Tehsil & 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.
2. That the preliminary delimitation of constituency has been published through public notice by the Election Commission of Pakistan in which

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objection against the preliminary delimitation has been invited till 3rd April 2018, therefore, the objection petition in hand is within time.

3. That total population of District D.G. Khan is 2872201 having 4 seats of National Assembly and 8 seats of Provincial Assembly are being under consideration to be constitute, National Assembly NA-189 D.G. Khan having his population 723159, two seats of Provincial Assembly PP-285, 286 falls in the area of above mentioned NA-189. The N.A 190 D.G. Khan having population 678715, two seats of Provincial Assembly PP-287, 288 falls in area of NA-190 Dera Ghazi Khan District. It is further mentioned that eight Provincial Seats of D.G. Khan Districts from PP-285 to PP-292, it is worth mentioning here that proposed population of PP-285 is 305525, 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.
4. That the PP-286 D.G. Khan having its population 357634 is proposed to be comprised of following areas of Tehsil Taunsa Sharif (1) Taunsa (2) Additional Tounsa (3) Nari, (4) MC Tounsa (5) QH of De-excluded area of D.G. Khan Tehsil (i) Barthi (2) Kharar Buzdar, (3) Fazla Kach. It is worth mentioned that in the above said 3 QHS of De-excluded area of Tehsil D.G.Khan Barthi, Kharar Buzdar and Fazla Kach are included in PP-286. During the delimitation process, the QHS Kharar Buzdar is included against the laws, rules, principles and section of delimitation rules 2017. The distance of QHS Kharar Budar is approximately 150km from TEhsil Taunsa, which is included in PP-286. on the other hand, the distance of Khara Buzdar is approximately 45 / 50 km from Kharar Buzdar to D.G. Khan, which is more convenient for the people of Kharar Buzdar. Whereas, if the area of QHS Makwal Kalan Tehsil Tounsa (Patwar Circle), Darabi, Bindi, Makwal Kalan (having population 27394) is excluded from PP-287 to include in PP-286. These areas are adjacent to the other area of PP-286 and distance will be not more than 30km.

5. That purpose of delimitation is to include the adjacent area in the constituency, therefore, it is proposed de-excluded area of D.G. Khan Tehsil QHS namely Kharar Buzdar having total population 28030 be excluded from PP-286 and included in PP-287. Whereas, the proposed excluded area PP-287 QHS Makwal Kalan (Patwar Circle Bindi, Darabi, Makwal Kalan) having population 27394 be included in PP-286. Whereas, in proposed scheme population of PP-287 is 353930, deficit is only 636 persons.
6. That there is gross violation of laws, rules, principles and sections of Delimitation Rules 2017.
7. 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 accordance with law, rules provisions, sections laid down in the Delimitation Act 2017.
8. 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 accepted and appreciated there shall be no effect on the rights of any individual.
- B. That if the proposed delimitation is appreciated and accepted there shall be no huge difference of population between the proposed Constituencies of Provincial Assembly PP-286 and PP-287.
- C. That if the proposed delimitation in PP-286 and PP-287 of D.G. Khan District, which is also clearly denoted in the map annexed with this petition, appreciated and accepted the graciously adjacent area in compact block / units shall be emerged and people of both constituencies in the same area.
- D. That QHS of D.G Khan Tehsil, Kharar Buzdar (de-excluded area) which is 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.


E. That an administrative Executive Revenue and Judicial Authorities are easily approachable for the people of PP-287. If the proposed administration is accepted and appreciated.

PRAYER:

It is therefore prayed that this petition / proposal may kindly be accepted and exclude QHS of Tehsil D.G. Khan de-excluded area Kharar Buzdar from PP-286 to include in PP-287 and also to be include QHS (Patwar Circle Makwal Kalan, Bindi, Darabhi, Makwal Kalan) PP-286 and to be excluded from PP-287. Any other appropriate relief which this Honourable Court deems fit and proper in the circumstances of the case may also be awarded.

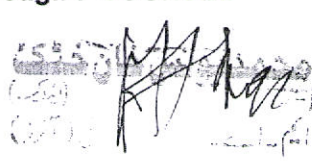
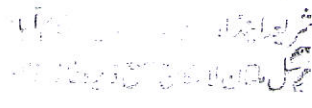

PETITIONER

Through : COUNSEL


1. Sardar Muhammad Nadeem Ghous Khosa
Advocate High Court
President District Bar D.G. Khan.

2. Muhammad Younas Sadiq Khatak Advocate

3. Syed Mumtaz Ahmad Bukhari
Advocate High Court



M. Ahmed
سید ممتاز احمد بخاری
ایڈووکیٹ ہائی کورٹ
ڈسٹرکٹ کورس ڈیہہ خان

CERTIFICATE:

Certified that this is the 1st objection petition on the subject in this Honourable Court.


PETITIONER