

# **BEFORE THE CHIEF ELECTION COMMISSIONER OF PAKISTAN**

Election Commission of Pakistan Secretariat, Election House, Constitution Avenue, G-5/2, Islamabad

## **OBJECTION PETITION U/S 20 OF THE ELECTION ACT 2017 & RULES 11 OF THE ELECTION RULES 2017**

Respectfully Sheweth:


That Objection petitioner is resident/voter of Village Sivia, & UC Sivia is situated in the previous PP constituency No.116 (present PP-65) since the year 2002.

2. That now during the delimitation the Election Commission of Pakistan has excluded Union Council Sivia from the constituency PP-65 (previous 116) & included the same in the constituency PP-66.

3. That the Act of exclusion of UC Sivia from the PP-65 and inclusion in the PP-66 is unlawful against the settle provision of law and also public convenience & public interest & liable to be set-aside/changed/reversed on the following amongst other grounds.

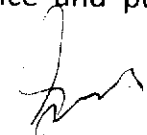
### **GROUND**

- a. That UC Sivia has Tehsil Headquarter, District Headquarter Hospital, Patwar Circles, Courts, Police Station Sadar Mandi Bahauddin at City Mandi Bahauddin which is the main city of PP constituency-65 (previous 116).
- b. That since the PP-116 is relevant constituency of the petitioner and other residence of the locality and union council, therefore their children are also studying at city Mandi Bahauddin.
- c. That petitioner and other voters of the area share common features with the people of the constituency of PP-65.
- d. That the delimitations as proposed by the Election Commission in its present shape, is in violation of concept of distribution of population in geographical compact area.
- e. That while excluding the village and union council of the petitioner from PP-65 regarding principles like facilities of communication and public convenience have been badly, ignored.
- f. That malafide intention of the authority stands proved from the fact that even before the fixation of the interim constituency list, one of the local newspaper "Daily Alaqa" in its publication dated: 28-02-2018 contains the details about the new constituency (copy attached).
- g. That even otherwise two Provincial constituencies No.67 & 68 were not disturbed, only new areas were added. On the other hand PP 65 and 66 were badly disturbed by inclusion and exclusion of new areas.

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- h. That primarily previous constituency 120 was finished. That constituency used to touch almost all remaining four constituencies. It was advisable that nearest area of the previous PP-120 should have been included in the remaining constituencies.
- i. That the area / union council of the petitioner along with Sivia, Sivia Union Councils rather whole Chellianwala Qanoongoi should be included in the PP-65 in its previous original shape and the villages like Mangat and Sohawa etc. should be excluded.
- j. That fundamental rights as provided in the constitution of Pakistan like education, health and convenience of the petitioner and other peoples have been badly ignored during delimitation process pertaining to the constituency PP-65 & PP-66. Even union councils, have been divided & included in different constituencies which is totally illegal and unjustified.
- k. That petitioner reserves the rights to raise some further grounds at the time of final arguments.

**PRAYER**

In view of the above by accepting this objection petition, the union council including village of the petitioner and the remaining areas of Chellianwala Qanoongoi may kindly be included in PP-65 by excluding the above mentioned areas to other constituencies 66 and 67 in the best interest of law justice and public convenience.

  
(Objection Petitioner)

FAISAL MAHMOOD

S/o Ghulam Rasul

R/o Sivia Tehsil &

District Mandi Bahauddin

CNIC# 34402-1670041-7

Cell: 0300-4774130

Through

  
JAVAID IQBAL BHATTI

Advocate

Supreme Court of Pakistan

7 Turner Road, Lahore.