

Handwritten signature and date: 30/03/2018

**BEFORE THE WORTHY ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD**

Liaquat Abbas son of Ghulam Abbas, Caste Bhatti,
resident of Village Burij Dara, Tehsil & District Hafizabad.
CNIC No.34301-1725093-9, Mobile No.0321-2222222.

.....Petitioner

Versus

Election Commission of Pakistan, Islamabad.

....Respondent

**MEMORANDUM / OBJECTION PETITION AGAINST THE
PRELIMINARY DELIMITATION/DRAFT REGARDING
THE NATIONAL CONSTITUENCY NA-87 DISTRICT
HAFIZ ABAD**

Respectfully Sheweth:

1. That the petitioner is resident of Village Burij Dara, Tehsil & District Hafizabad and is enrolled voter to constituency number NA-87 Hafizabad. Copies of CNIC and vote certificate are attached herewith as **Annex-A & A1.**
2. That the respondent/Election Commission of Pakistan has published its preliminary delimitation/draft regarding the constituency NA-87 District Hafizabad.
3. That the preliminary delamination/draft regarding the national constituency of District Hafizabad i.e. NA-87 Hafizabad is against the fundamental rules,

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principles, provisions and sections laid down in the Delimitation Rules and Act, 2017.

4. That the Election Commission of Pakistan has published preliminary draft/delimitation regarding the constituency NA-87 district Hafizabad. Copy of public notice is attached herewith as **Annex-B**.
5. That Election Commission of Pakistan has issued a preliminary draft/delimitation against law, facts, rules, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017.
6. That the preliminary draft/delimitation of constituency NA-87 is liable to be rectified, modified and revised under the following grounds:

GROUND:

- a. That district Hafizabad consist upon 1,156,957/-. Copy of map is attached herewith as **Annex-C**.
- b. That earlier district Hafizabad was consisted upon two national constituencies i.e. old NA-102 Hafizabad-I and NA-103 Hafizabad-II, new NA-87 but unfortunately now in new preliminary delimitation/draft district Hafizabad delimited upon only one national constituency viz NA-87 Hafizabad.

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- c. That the population of district Hafizabad is 1,156,957/- so there must be delimited the district Hafizabad upon two national constituency.
- d. That each and every citizen of Pakistan has fundamental right to be treated equally but in district Hafizabad voters have been deprived from their fundamental rights to cast their votes as the value of voter of the district Hafizabad is half into quantity as compared to other parts of the province as well as country, which is repugnant to the fundamental rights.
- e. That the district Jhelum consisted upon population of 54,613 as NA-67 and this district is consisted upon two national constituencies.
- f. That the ECP has violated and deviated fundamental rights of voters and golden principles of delimitation, so the preliminary draft/delimitation of district Hafizabad is liable to be rectified, modified and revised.

PROPOSAL:

That the proposal of the petitioner regarding the delimitation of Hafizabad into two national constituencies is within the ambit of golden principles, rules, provisions and sections laid down in the Delimitation Rules and Act, 2017 as under:

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• **NA-87 Hafizabad-I**

i.	Kalaykimandi QH	59,376
ii.	Kalaykimandi TC	18,171
iii.	Sukhaykimandi QH	64,806
iv.	Sukhaykimandi MC	42,626
v.	Kot Nakka	93,642
vi.	Pindi Bhattian MC	55,515
vii.	Pindi Bhattian QH	54,407
viii.	Jalal Pur Bhattian	70,592
ix.	Jalal Pur Bhattian MC	40,755
x.	Kasesey	70,879
	Total Population	570,769/-

• **NA-88 Hafizabad-II**

i.	Hafizabad MC	245,784
ii.	Hafizabad QH	36,626
iii.	Hafizabad QH2	31,898
iv.	Chak Chatta	98,189
v.	Wanikitarar	54,910
vi.	Kolotarar	65,004
vii.	Soiowala	53,779
	Total Population	586,190/-

In this manner keeping the rule of equality in district Hafizabad must be consisted upon two national constituencies. So that each and every voter of district Hafizabad may be given chance to cast his vote as compared to the other parts of province and country.

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That district Hafizabad is one of only district in whole of the country where voters have been deprived to elect thereto members of national constituencies.

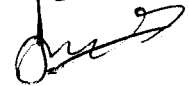
That the preliminary delimitation has deprived the voter of the Hafizabad from their right to vote in the favour of two national constituencies.

That the result of delimitation is contrary deviation and negation of fundamental rights. The proposed map along with proposed population can be perused.

PRAYER:


In the circumstances mentioned above, it is humbly prayed that by accepting this memorandum/objection petition district Hafizabad may kindly be delimited and consisted upon two national constituencies i.e. NA-87 Hafizabad-I and NA-88 Hafizabad-II, in the interest of public and justice.

Petitioner
Liaquat Abbas



Through

Khurshid Ahmed Khan Chandia
Advocate High Court
0300-6718153



Imdad Ali Nekokara
Advocate High Court
0322-5111167
72 Mall Road, Lahore.