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

Muhammad Arshad son of Muhammad Bashir, Caste  
Kharal, resident of Nothene, District Hafizabad. Cell  
No.0345-8400001.

.....Petitioner

Versus

Election Commission of Pakistan, Islamabad.

....Respondent

**MEMORANDUM / OBJECTION PETITION AGAINST THE  
PRELIMINARY DELIMITATION/DRAFT REGARDING  
THE PROVINCIAL CONSTITUENCIES PP-69, PP-70 &  
PP-71 DISTRICT HAFIZ ABAD**

Respectfully Sheweth:

1. That the petitioner is resident of Nothene, District Hafizabad and is enrolled voter member of constituency No.71 District Hafizabad. Copies of CNIC and vote certificate are attached herewith as **Annex-A & A1.**
2. That Election Commission of Pakistan has published its preliminary delimitation/draft regarding the provincial constituencies of District Hafizabad. Public notice is attached herewith as **Annex-B.**

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3. That the preliminary delamination/draft regarding the provincial constituencies of District Hafizabad i.e. PP-69, PP-70 & PP-71 Hafizabad is against the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017.
4. That the present formulation/preliminary delimitation draft is totally against the existing boundaries compactness of areas, common sources of communication, infrastructures and public convenience, which are the basic and fundamental rules and guidelines for the purpose of delimitation.
5. That Election Commission of Pakistan has negated ignored and deviated as well as violated the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017, which is totally contradictory and opposite to the prescribed formula, laws, rules and provisions, so is liable to be modified, rectified and revised.
6. That the district Hafizabad is consisting upon three (03) provincial constituencies i.e. 69, 70 & 71. PP map and impugned notification are attached herewith as **Annex-C & C1**.

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7. That the preliminary draft/delimitation is liable to be modified, rectified and revised upon the following grounds:

**GROUND:**

- a. That the population of district Hafizabad consist upon 1,156,957/- and this population must be equally divided upon three (03) provincial constituencies.
- b. That three (03) provincial constituencies of district Hafizabad with the formula of total population divided by three (03) and with this average the population of each constituency upon 1,156,957/- population but presently there is a huge difference of population amongst the population of all three provincial constituencies, which is against the golden principle of parity of population. Proposed population data of constituencies is attached herewith as **Annex-D**.
- c. That the present preliminary delimitation/draft is gross violation of fundamental rules, principles, provisions and sections laid down as the areas containing to each and every constituency or not into compact blocks of population in connection with common source of communication,

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infrastructure, existence of boundaries and public convenience.

- d. That the preliminary delimitation/draft is liable to be modified, rectified and revised as there is no parity of population, compactness of areas with existing boundaries, common source of communication, infrastructure and public convenience and it can be perused in the preliminary delimitation/draft.
- e. That the proposal of the petitioner given below is in accordance with the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017 keeping in mind and view all the fundamental rules and principles of compactness of areas existing boundaries, sources of communication and in the interest of public convenience.

**PROPOSAL:**

That the all three (03) constituencies be into compactness of areas, existing boundaries, common source of communication, infrastructure and public convenience with the parity of population as well as the dutiful and feasible distribution of areas and population.

- **PP-69 Hafizabad-I**
  - i. Shoyanwala

53,779

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ii.	Wanikitrar	54,910
iii.	Kolotrar	65,004
iv.	Kasesey	70,879
v.	Jalal Pur Bhattian	70,592
vi.	Jalal Pur Bhattian MC	40,755
	<b>Total Population</b>	<b>355,919/-</b>

• **PP-70 Hafizabad-II**

i.	Hafizabad MC	245,784
ii.	Hafizabad QH	36,626
iii.	Hafizabad QH2	31,898
iv.	Chak Chatta	98,189
	<b>Total Population</b>	<b>412,497/-</b>

• **PP-71 Hafizabad-III**

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
	<b>Total Population</b>	<b>388,543/-</b>

That the above mentioned proposal is very close to the compactness of areas, parity of population, existing boundaries, and common source of communication, infrastructure and public convenience, as the population

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data along with proposed map is the part of proposal of the petitioner.

**PRAYER:**

In the circumstances mentioned above, it is humbly prayed that by accepting this memorandum/objection petition, all the three (03) provincial constituencies of district Hafizabad may kindly be delimited and formulated under the proposal of the petitioner keeping in view the population data and proposed map of district Hafizabad in the interest of public and justice.



Petitioner  
Muhammad Arshad  
Cell No.0345-8400001

Through



**Khurshid Ahmed Khan Chandia**  
Advocate High Court  
0300-6718153



**Imdad Ali Nekokara**  
Advocate High Court  
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