

BEFORE THE SECRETARY ELECTION COMMISSION OF
PAKISTAN ISLAMABAD.

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Sadaqat Ali Khan S/o Malik Sher Afzal Khan (CNIC No: 37103-9487989-3) Resident of House No. CB-290, Street No. 06, Mohallah Gulshan Colony, Bilal Street Wah Cantt, Tehsil Taxila, District Rawalpindi. Cell No: 0313-9122522 (Petitioner)

Subject: REPRESENTATION UNDER SECTION 21 (3) OF THE
ELECTION ACT 2018 IN RESPECT OF
DE-LIMITATION OF NA-55 AND NA-56 FOR THE
NATIONAL ASSEMBLY OF PAKISTAN.

RESPECTFULLY SHEWETH:-

1. That the petitioner is a voter in District Attock. Copy of voter list is enclosed as Annexure "A".
2. That in the Election of 2013, District Attock has 03- National Assembly Seats. However, presently, District Attock has 02 National Assembly Seats.
3. That sub section 4 of Section 19 provides as under:-
"(4) For the purpose of election to Provincial Assemblies, the Commission shall divide each Province

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into as many separate territorial constituencies as the number of general seats specified in Article 106.”

The General Seat for the Province of Punjab in the National Assembly are 141, therefore, the Province has to be divided into separate 141 territorial constituencies.

4. That Section 20 of the Election Act 2017 gives the principles of de-limitation. Section 20 is reproduced:-

20. Principles of delimitation.—(1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

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(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.

By reading Section 20, it is clear that while delimiting the constituencies, as far as practicable, regard has to be given to the distribution of population in geographical compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies. In this respect, variation in population of constituencies is permissible to the extent of 10%.

5. That in the last census, the population of Punjab 110,012,442. Thus, in terms of section 20, each constituency should have 780,230. The population of District Attock is 1,883,556. If this population is divided by two, each constituency for National Assembly should have the population of 941,778. As has already been submitted that variation to the extent of 10% is permissible.

6. That in the proposed delimitation in NA-55, the following areas have been included:-

- i. Tehsil Hassanabdal
- ii. Tehsil Hazro

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iii. Tehsil Attock excluding Qanoongoi Halqa Attock-1.

The population of Tehsil Hassanabdal 216566, the population of Tehsil Hazro is 339,238 and the population of Tehsil Attock excluding Qanoongoi Halqa Attock-1 is 960927. Rest of the District Attock has been given the constituency Number as NA-56. The population of areas included in NA-56 is 922,629. So far as the area of NA-56 is concerned that is very wide.

7. That while proposing National Assembly Constituency, Sub rule 4 of Rule 8 second proviso has altogether been ignored which provides that the delimitation is to start from North end of the District and then to proceed clockwise. This principle has not been kept in mind.
8. That the petitioner proposes that NA-55 should be composed of Tehsil Hazro, Tehsil Hassanabdal, Fateh Jang and Qanoongoi Halqa of Pindigheb Khaur. The total population of this area would be 944,917. The rest of District Attock should be included in NA-56. The total population of NA-56 would be 938,639. Thus both the constituencies would be equal population and equal area. This would be in accord with the provision of the Section 20 of the Election Act 2018

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PRAYER:-

It is therefore, respectfully prayed that the instant representation may kindly be allowed, the delimitation of NA-55 and NA-56 may kindly be modified as prayed for. The relevant maps are annexed.

Dated: 02-04-2018

Jah
..... Petitioner

Through

Muhammad Munir Paracha

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