

**BEFORE SECRETARY ELECTION COMMISSION OF  
PAKISTAN**

Subject: **Memorandum of Appeal Against Notified  
Constituencies No. NA-60, NA-61 and NA-62 of  
Rawalpindi Distt.**

Appellant/Petitioner respectfully submits as under:-

1. That petitioner is Ex-Tehsil Member of Rawalpindi Municipal Corporation, he is citizen of Pakistan and a voter member of notified constituency NA-62, hence petitioner has locus standi and a legal right to file instant appeal against Notified Constituencies bearing No. NA-60, NA-61 and NA-62 inter-alia on the following:-

**GROUND**

- i. That above noted constituencies have been constituted/made on population and areas of Municipal Corporation Rawalpindi, District Council Rawalpindi, Cantonment Board Chaklala and Cantonment Board Rawalpindi. According to notification of Election Commission NA-60 has been constituted on population of 788342 whereas NA-61

has been constituted on population of 818187. Similarly NA-62 Contains population of 706780, this division of population is against the interest of public at large.

- ii. That the configuration and formation of the three constituencies of the District Rawalpindi are in disregard of the principles of Delimitation which are provided in Chapter#3, Section#20 of Election Act 2017. The affairs of water supply, building plans and taxation and other civic activities in Municipal Corporation, District Council and Cantonment Boards are not only different but are controlled by different laws, rules and concerned departments, therefore division of all the three constituencies in the areas of Municipal Corporation, District Council and Cantonment Boards may cause hardships for public-at-large living in notified constituencies.
- iii. That two charges of Municipal Corporations has been malafidely included in NA-61, which is consisting on maximum population and areas of

Cantonment Boards. This inclusion of two charges clearly reflects that Geographical and other Civic conditions has not been consider by the competent authority.

- iv. That the authority making changes in previous constituencies have not looked into rather has not reasonably considered the geographical and other civic inconvenience of population living in notified constituencies.

It is therefore prayed that above mentioned notified constituencies may be rectified with following proposals of petitioner.

**PROPOSALS:-**

- i. That in past, two constituencies i.e. NA-60 and NA-62 were consisting of maximum areas falling in Municipal Corporation Rawalpindi, but now according to impugned notification all the above mention three constituencies have been badly constituted on the areas falling in Municipal Corporation, Cantonment Boards and District



Council, therefore it is very humbly proposed that charges No. 11 & 12, which are falling in Municipal Corporation may be included in NA-62.

ii.

Constituency	Previous Population	Proposed Population
NA-60	788342	748534
NA-61	818187	801048
NA-62	706780	763787

iii. Charge No. 19, which is adjacent to NA-60 may be included in NA-60 and charges No. 204, 205 and 206 may be included in NA-61. If these proposals are exceeded to the population of NA-60 will come to 748534, population of NA-61 shall become 801048 and population of NA-62 will be 763787, which is more reasonable than that of notified constituencies.

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- iv. That the changes proposed by the petitioner/appellant do not cause any prejudice to any person or political party, but these proposals have been submitted for the larger interest of public at large on the basis of geographical and civic conditions of the areas.

It is therefore prayed that this appeal may kindly be accepted and above mention noted constituencies may kindly be changed according to the proposal submitted by the appellant.

Note: That the plane consisting of proposed changes in the constituencies is attached herewith instant appeal.



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