

D

(c)

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

**REPRESENTATION**

UNDER SECTION 21(3) OF THE ELECTIONS ACT, 2017 READ WITH  
RULE 12 OF THE ELECTION RULES 2017

**FILED BY**

**UMER TANVEER BUTT**  
Son of Tanveer Ul Haq Butt  
R/o H. No. 13, Lane No. 6,  
Mall Villas, Peshawar Road,  
Rawalpindi

**IN RESPECT OF**

**ALTERATIONS AND MODIFICATION IN THE PRELIMINARY**  
**PROPOSAL FOR DELIMITATION OF CONSTITUENCY OF**  
**NA 61 AND PP - 17 RAWALPINDI - V**

Respectfully Sheweth:

1. That the petitioner is the voter having block code 111070402 at serial No. 361 in constituency of NA-61 and PP-17 Rawalpindi - V.
2. That vide notification No. F.8(3)/2018-Elec-I dated 05.03.2018, this Honourable Commission has published the preliminary proposals for the delimitation of the constituency of NA 61 and PP-17 Rawalpindi - V amongst others.
3. That in the published preliminary proposals for delimitation, the former constituency of PP - 10 has been renumbered as PP - 17 whereas NA - 54 has been renumbered as NA - 61.
4. That this Honourable Commission has altered the limits of constituencies of NA - 61 and PP - 17 in a manner prejudicial to the prescribed rules and norms.
5. That the petitioner is seeking the amendments in the preliminary proposal and to redefine the limits of above stated constituencies in the following manner and on the following;

**GROUND**

- a. The area proposed in PP-17 is  
Charge No. 11101,  
Charge No. 11102,  
Census Circle No. 1, 3 & 4 of Charge 11107,

Charge No. 11108,  
Charge No. 11011,  
Charge No. 11012

PP-17 (Former PP - 10) was earlier delimited and comprised upon area

Charge No. 11101,  
Charge No. 11102,  
Charge No. 11106  
Charge No. 11107,  
Charge No. 11108,

The geographical limits of charge 11011 are not connected with PP - 17. The Railway track dissects the charge 11011 from the other area in proposed delimitation and the only available connection of said area with PP - 17 is through a bridge over a Railway Track.

- b. The charge wise distribution of population in the proposed PP- 17 is as under;

Area	Population
Charge No. 11101,	65,906
Charge No. 11102,	100,796
Census Circle No. 1, 3 & 4 of Charge 11107	38,550
Charge No. 11108	51,130
Charge No. 11011	67,373
Charge No. 11012	84,364
<b>Total</b>	<b>408,119</b>

The Quota per seat in respect of PP is prescribed as 370,429. As per sub section (3) of section 20 of the Elections Act, 2017 the constituency shall be delimit according to the quota/distribution of population as far as possible. The variation permitted is ten percent.

The maximum permissible limit of population in case of PP - 17 is thus 407,472 whereas the proposed delimitation is exceeding said limit.

- c. The charge wise distribution of population in the proposed PP- 18 is as under;

Area	Population
Charge No. 11103,	70,517
Charge No. 11104,	69,332
Charge No. 11105	73,721
Charge No. 11106	101,435
Census Circle No. 2 & 5 of Charge 11107	95,063
<b>Total</b>	<b>410,068</b>

(3)

The Quota per seat in respect of PP is prescribed as 370,429. As per sub section (3) of section 20 of the Elections Act, 2017 the constituency shall be delimit according to the quota/distribution of population as far as possible. The variation permitted is ten percent.

**The maximum permissible limit of population in case of PP – 17 is thus 407,472 whereas the proposed delimitation is exceeding said limit.**

- d. The charge wise distribution of population in the proposed NA – 61 is as under;

Area	Population
Charge No. 11101	65,906
Charge No. 11102	100,796
Charge No. 11103	70,517
Charge No. 11104	69,332
Charge No. 11105	73,721
Charge No. 11106	101,435
Charge No. 11107	38,550
Charge No. 11108	51,130
Charge No. 11011	67,373
Charge No. 11012	84,364
<b>Total</b>	<b>818,187</b>

The Quota per seat in respect of NA in Punjab is prescribed as 780,266. As per sub section (3) of section 20 of the Elections Act, 2017 the constituency shall be delimit according to the quota/distribution of population as far as possible.

**The proposed population is 5.3% approx. higher than the prescribed limit. The permissible variation is ten percent however if practicable, the same must be delimit according to the quota. The amendment proposed through instant petition will reduce down the percentage of variation and will follow the prescribed rules.**

- e. The quota of 7 seats in NA is allocated to District Rawalpindi in the proposed delimitation. The population variation on 5 seats of NA is not more than  $\pm 2\%$ . However in case NA – 61 the population variation is  $+5.3\%$  and in case of NA – 62, the population variation is  $-9.5\%$ .

**Through amendments in delimitation proposed in the instant petition, the above stated Population variation can be brought down to less than  $\pm 4\%$  of the limit prescribed under Rules.**

- f. Charge No. 11101, Charge No. 11102, Charge No. 11108, Census Circle No. 1, 3 & 4 of Charge 11107 are located within the territorial
- (4)

C

(4)

limits of Rawalpindi Cantt. whereas the Charge No. 11011 is located within the Tehsil Municipal Administration Rawalpindi.

**Therefore the Administrative unit of charge 11011 is different than that of other major area of PP - 17.**

- g. The proposed delimitation is against the principle of distribution of population in geo graphically compact area.
- h. The proposed delimitation is against the physical features of the area.
- i. The proposed delimitation is against the existing boundaries of administrative units.
- j. The proposed delimitation is against the facilities of communication of the area.
- k. The proposed delimitation is against the convenience of the public residing in the area.
- l. The proposed delimitation is against the principle of homogeneity of the residents of the area.

#### PROPOSED AMENDMENTS

##### NA - 61

Existing			Proposed		
Area	No.	Population	Area	No.	Population
Charge 11101	No.	65,906	Charge 11101	No.	65,906
Charge 11102	No.	100,796	Charge 11102	No.	100,796
Charge 11103	No.	70,517	Charge 11103	No.	70,517
Charge 11104	No.	69,332	Charge 11104	No.	69,332
Charge 11105	No.	73,721	Charge 11105	No.	73,721
Charge 11106	No.	101,435	Charge 11106	No.	101,435
Charge 11107	No.	38,550	Charge 11107	No.	38,550
Charge 11108	No.	51,130	Charge 11108	No.	51,130
Charge 11011	No.	67,373			
Charge 11012	No.	84,364	Charge 11012	No.	84,364
<b>Total</b>		<b>818,187</b>	<b>Total</b>		<b>750,874</b>

✓      (5)

**NA - 62**

Existing			Proposed		
Area		Population	Area		Population
			Charge 11011	No.	67,373
Charge 11013	No.	96,424	Charge 11013	No.	96,424
Charge 11014	No.	67,599	Charge 11014	No.	67,599
Charge 11015	No.	83,265	Charge 11015	No.	83,265
Charge 11016	No.	59,201	Charge 11016	No.	59,201
Charge 11017	No.	27,922	Charge 11017	No.	27,922
Charge 11018	No.	62,757	Charge 11018	No.	62,757
Charge 11019	No.	94,790	Charge 11019	No.	94,790
Charge 11020	No.	68,016	Charge 11020	No.	68,016
Charge 11022	No.	53,509	Charge 11022	No.	53,509
Charge 11023	No.	53,142	Charge 11023	No.	53,142
Charge 11024	No.	40,155	Charge 11024	No.	40,155
<b>Total</b>		<b>706,780</b>	<b>Total</b>		<b>774,093</b>

**PP - 17**

Existing			Proposed		
Area		Population	Area		Population
Charge 11101	No.	65,906	Charge 11101	No.	65,906
Charge 11102	No.	100,796	Charge 11102	No.	100,796
Census Circle No. 1, 3 & 4 of Charge 11107		38,550	Census Circle No. 1, 3, 4 & 5 of Charge 11107		57,381
Charge 11108	No.	51,130	Charge 11108	No.	51,130
Charge 11011	No.	67,373			
Charge 11012	No.	84,364	Charge 11012	No.	84,364
<b>Total</b>		<b>408,119</b>	<b>Total</b>		<b>359,577</b>

**PP - 18**

Existing			Proposed		
Area		Population	Area		Population
Charge	No.	70,517	Charge	No.	70,517

✓      (6)

⑥

11103		11103	
Charge No.	69,332	Charge No.	69,332
11104		11104	
Charge No.	73,721	Charge No.	73,721
11105		11105	
Charge No.	101,435	Charge No.	101,435
11106		11106	
Census Circle No. 2 & 5 of Charge 11107	95,063	Census Circle No. 2 of Charge 11107	76,232
<b>Total</b>	<b>410,068</b>	<b>Total</b>	<b>391,237</b>

**PP - 15**

Existing		Proposed	
Area	Population	Area	Population
		Charge No. 11011	67,373
Charge No. 11017	27,922	Charge No. 11017	27,922
Charge No. 11018	62,757	Charge No. 11018	62,757
Census Circle No. 3, 4 & 5 of Charge No. 11019	50,560	Census Circle No. 5 of Charge No. 11019	22,267
Charge No. 11020	68,016	Charge No. 11020	68,016
Charge No. 11022	53,509	Charge No. 11022	53,509
Charge No. 11023	53,142	Charge No. 11023	53,142
Charge No. 11024	40,155	Charge No. 11024	40,155
<b>Total</b>	<b>356,061</b>	<b>Total</b>	<b>395,141</b>

**PP - 16**

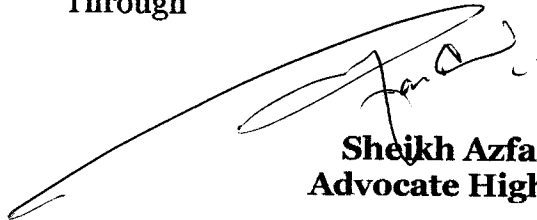
Existing		Proposed	
Area	Population	Area	Population
Charge No. 11013	96,424	Charge No. 11013	96,424
Charge No. 11014	67,599	Charge No. 11014	67,599
Charge No. 11015	83,265	Charge No. 11015	83,265
Charge No. 11016	59,201	Charge No. 11016	59,201
Census Circle No. 1, 2, 6 & 7 of Charge No. 11019	44,530	Census Circle No. 1, 2, 3, 4, 6 & 7 of Charge No. 11019	72,823
<b>Total</b>	<b>350,719</b>	<b>Total</b>	<b>350,719</b>

It is therefore requested that the above stated proposed amendments may kindly be incorporated in the final list for delimitation.



**UMER TANVEER BUTT**  
Son of Tanveer Ul Haq Butt  
R/o H. No. 13, Lane No. 6,  
Mall Villas, Peshawar Road,  
Rawalpindi  
0305-6666166

Through



**Sheikh Azfar Amin**  
**Advocate High Court**