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**BEFORE THE HONORABLE ELECTION COMMISSION OF**  
**PAKISTAN, ISLAMABAD.**

*In the matter of:*

**Delimitation of the constituencies of National Assembly in**  
**District Hafizabad , NA-87.**

**REPRESENTATION ON BEHALF OF KHUDADAD**  
**CHATTA S/O RIAZ HUSSAIN CHATTA R/O MUSLIM**  
**COLONY STREET NO.5, TEHSIL & DISTRICT**  
**HAFIZABAD, IN RESPECT OF DELIMITATION OF THE**  
**CONSTITUENCY NA-87 HAFIZABAD — PROPOSED IN**  
**THE PRELIMINARY REPORT.**

**May please your honour:**

*That the brief facts leading to the filing of the present election petition are as under:*

1. That the Petitioner/ objector a registered voter of the constituency NA-87 (Hafizabad). Previously, the constituency was NA-102 (Hafizabad ) and the Objector is aggrieved of the delimitation of the constituency proposed in the preliminary report.
  - *Copy of the CNIC of the objector is attached as Annexure-A*
  - *Copy of the relevant page of the voters is attached as Annexure-A/1*
2. That the district election officer Hafizabad has suggested the national assembly constituency (NA-87) in the following manner:-
  - a) The whole district had been included in the said constituency.

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b) The boundaries of the constituency in from one end to other is almost 150 KM touching Pindibhattian in North, Sheikhupura in south, Gujranwala in East and District of Sargohda & Chinot in west.

c) Unlike other districts in Punjab, the whole district is made one constituency, ignoring the fact that during the last elections 2 seats of national assembly were demarked from the same district (NA102,103)

d) The population of the proposed constituency is 11,57,957.

- *Copy of the proposed/suggested plan of the constituency is attached as Annexure-B.*

3. That the perusal and examination of the above proposed delimitation of the above constituencies is faulty, unnatural and offensive to the basic concept of the delimitation. Such delimitation may disfranchise a great number of voters, the detail whereof is as under:-

(a) That the basic concept of the delimitation is to distribute population in various constituencies, the constituency of National Assembly have been demarked in manner that the population is less than 800,000, persons by demarking proposed NA-87, the basic concept have been altogether ignored.

(b) The delimitation of the same constituency during the past was comprised of 2 seats of national assembly each have more or less then 5,50,000. The deviation from the previous/delimitation speaks beyond the iota of any doubt; the district election officer has departed the very concept of delimitation as his predecessor has marked in the last.

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(c) That the impugned delimitation is offensive to the basis concept of delimitation of the constituency namely the geographical compactness, public convenience and accessibility of the voter to the polling stations.

4. That the District Election Commissioner Hafizabad who conducted the physical survey of all the constituencies in District Hafizabad, proposed and recommended the demarcation of the boundaries but ignored the fact the distances of the constituencies are disproportionate and the facility of transport as well as access to the polling stations will be impossible and inadequate which will cause unnecessary problems to the voters who will remain unfamiliar and will not be able to know where the polling stations are and to which constituency they belong to.
5. The suggested demarcation/delimitation will disfranchise and will deprive them of their fundamental right to select candidate of choice owing to inconvenient constituency spread over unreasonably large territory.
6. That comparing the delimitation of NA-87 with the other suggested constituency of adjoining district it is evident that the same principle or yardstick does not apply in the course of suggested delimitation.

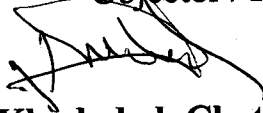
*In the luminosity of aforementioned,* it is most respectfully prayed that the proposed demarcation of electoral constituency NA-87 is unjust, illegal and against the basic foundation of the principles of delimitation of the constituencies hence the same may please be set aside by reducing the enlarged area of constituency into accessible territory to enable the voter to cast and join stream of country politics.

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*It is further prayed that* this Honorable Commission may be please  
to make the demarcation and process of delimitation a fresh by  
fabricating the constituency into 2 electoral constituencies.

*Any other relief* that this Honorable Tribunal deems fit and proper in  
the circumstances may also be granted in the interest of justice.

Objector / Petitioner



**Khudadad Chatta**

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Through



**Hassan Ijaz Cheema**  
Advocate High Court



**Muhammad Mohsin Malik**  
Advocate High Court



**Hyat and Meerjees**

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