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20/03/2018

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

Shoukat Ali son of Mehdi Hassan, Caste Bhatti, resident of Village Burij Dara, Tehsil & District Hafizabad. CNIC No.34301-4639002-3, Mobile No.0300-8400012.

.....Petitioner

Versus

Election Commission of Pakistan, Islamabad.

?

....Respondent

**MEMORANDUM / OBJECTION PETITION AGAINST THE
PRELIMINARY DELIMITATION/DRAFT REGARDING
THE NATIONAL CONSTITUENCY NA-87 DISTRICT
HAFIZ ABAD**

Respectfully Sheweth:

1. That the petitioner is resident of Village Burij Dara, Tehsil & District Hafizabad and is enrolled voter to constituency number NA-87 Hafizabad. Copies of CNIC and vote certificate are attached herewith as **Annex-A & A1.**
2. That the respondent/Election Commission of Pakistan has published its preliminary delimitation/draft regarding the constituency NA-87 District Hafizabad.
3. That the preliminary delamination/draft regarding the national constituency of District Hafizabad i.e. NA-87 Hafizabad is against the fundamental rules,

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principles, provisions and sections laid down in the Delimitation Rules and Act, 2017.

4. That the Election Commission of Pakistan has published preliminary draft/delimitation regarding the constituency NA-87 district Hafizabad. Copy of public notice is attached herewith as **Annex-B**.
5. That Election Commission of Pakistan has issued a preliminary draft/delimitation against law, facts, rules, provisions, sections and guidelines laid down in the Delimitation Rules and Act, 2017.
6. That the preliminary draft/delimitation of constituency NA-87 is liable to be rectified, modified and revised under the following grounds:

GROUND:

- a. That district Hafizabad consist upon 1,156,957/-. Copy of map is attached herewith as **Annex-C**.
- b. That earlier district Hafizabad was consisted upon two national constituencies i.e. old NA-102 and NA-103 Hafizabad-II but now it has been delimited upon the only one and single national constituency i.e. NA-87 Hafizabad. The notification is attached herewith as Annex-D.

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- c. That the preliminary delimitation/draft regarding the constituency NA-87 is against the rules, laws, principles, provisions and sections of The Delimitation and Rules Act, 2017 on the following grounds:

GROUND:

- a. That the population of district Hafizabad is 1,156,957/- so there must be delimited the district Hafizabad upon two national constituency.
- b. That each and every citizen of Pakistan has fundamental right to be treated equally but in district Hafizabad voters have been deprived from their fundamental rights to cast their votes as the value of voter of the district Hafizabad is half into quantity as compared to other parts of the province as well as country, which is repugnant to the fundamental rights.
- c. That the district Jhelum consisted upon population of 54,613 as NA-67 and this district is consisted upon two national constituencies.
- d. That the ELECTION COMMISSION OF PAKISTAN has violated and deviated fundamental rights of voters and golden principles of delimitation, so the preliminary draft/delimitation of district Hafizabad is liable to be rectified, modified and revised.

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- e. In this manner keeping the rule of equality in district Hafizabad must be consisted upon two national constituencies. So that each and every voter of district Hafizabad may be given chance to cast his vote as compared to the other parts of province and country.
- f. That district Hafizabad is one of only district in whole of the country where voters have been deprived to elect thereto members of national constituencies.
- g. That the preliminary delimitation has deprived the voter of the Hafizabad from their right to vote in the favour of two national constituencies.
- h. That the result of delimitation is contrary deviation and negation of fundamental rights. The proposed map along with proposed population can be perused.

PROPOSAL:

That the NA-88 be consisting upon Hafizabad City, QHs Kolotarar, QH Vaniketatarar, QH Soyianwala, QH Ali Pur Chatta, QH Nokhar, QH Ali Pur MC, QH Hardo Warpal, PC Dargahi Wala, Wazir k Chatta PC, PC Nohiyan Wala Chatta, PC Jhattan Chatta, Harchoki PC Hafizabad-I and NA-87 Hafizabad-II be consisting upon QH Kasoki, QH Kalaykimandi, QH Kalleki City, QH Sukheki Mandi, QH Kot Nakka, QH Pindi Bhattian City, QH Jalalpur Bhattian, QH Jalalpur City, QH Kassesay. Copy of proposed map along

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with proposed population data is attached herewith as **Annex-D.**

That to formulate and constitute NA-88 Hafizabad II of area of QH Ali Pur Chattha, MC Ali Pur Chattha and some PCs of QH Hardo Pal and QH Ali Pur Chattha be taken from NA-79 Gujranwala and then the population of all three constituencies become equal and appropriate for the purpose of delimitation of national constituencies. Detail is given in the proposed population of three constituencies.

That the proposal of the petitioner regarding the delimitation of Hafizabad into two national constituencies is within the ambit of golden principles, rules, provisions and sections laid down in the Delimitation Rules and Act, 2017 as under:

• NA-87 Hafizabad-I	
i. Kalaykimandi QH	59,376
ii. Kalaykimandi MC	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
viii. Jalal Pur Bhattian QH	70,592
ix. Jalal Pur Bhattian MC	40,755
x. Kasesey	70,879
xi. Chak Chattha	98,189
Total Population	668,958/-
• NA-88 Hafizabad-II	
i. Hafizabad MC	245,784
ii. Hafizabad-I QH	36,626
iii. Wanikitarar	54,910

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iv. Kolotarar	65,004
v. Soiyanwala	53,779
vi. Ali Pur Chattha	53,498
vii. Ali Pur MC	60,989
viii. Darghai Wala	3798
ix. Wazir k Chattha	5514
x. Hardo Saharan Chattha PC	9040
xi. Noyian Wala	6241
xii. Jatthan Wali PC	5211
xiii. Harchoki PC	7004
xiv. Hafizabad-II QH	31,898
Total Population	639,296/-

• **NA-79 Gujranwala**

Population	830,396
Exclusion of Ali Pur Chattha QH, MC, some PCs of Hardopal QH Mentioned above	<u>-151,295</u> 679,101/-

PRAYER:

In the circumstances mentioned above, it is humbly prayed that by accepting this memorandum/objection petition district Hafizabad may kindly be delimited and consisted upon two National Constituencies i.e. NA-87 Hafizabad-I and NA-88 Hafizabad-II as proposed above (the proposal of the petitioner is the part of prayer), in the interest of public and justice.

Petitioner
Shoukat Ali

Through

Khurshid Ahmed Khan Chandia

Advocate High Court
0300-6718153

Imdad Ali Nekokara

Advocate High Court
0322-5111167
72 Mall Road, Lahore.