

To,

The Honourable Secretary,
Election Commission Of Pakistan,
Islamabad.

**Subject: MEMORANDUM/OBJECTION AGAINST THE
PRELIMINARY DELIMITATION REGARDING
THE NATIONAL CONSTITUENCY NA-87
DISTRICT HAFIZABAD.**

Respectfully Sheweth:

1. That substratum of peaceful and progressive society can only be erected upon vertical pyramid if discretion is used judiciously in accordance with law and rules of business, contained therein. Unfortunately, the political as well as administrative canvas of our homeland is miserably tainted with cancer of corruption, plague of nepotism, dissatisfy of Sefarish, recommendations, this sort of attitude is destined to sow the seeds of desperation, pessimism and perfunctory attitude.
2. That the applicant is resident of Village Machonika Tehsil Pindi Bhattian District

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petitioner voter is duly reflected in the concerned voter at serial No. 195 and block code bearing No. 170030602. Copy of CNIC is attached here with for kind perusal as **Annexure-A.**

3. That the delimitation of national as well as provincial assemblies was published in official Gazette vide notification No. F-8(3)/2018-Elec-1 dated 08.03.2018.
4. That prior to the above said notification there were two constituencies of district Hafizabad; NA-102 and NA-103 but the above said notification has reduced it to one constituency which is NA-87 for the whole district Hafizabad.
5. That consequent to the recent delimitation process the shape of the constituency has entirely changed and the amended or changed constituency under delimitation process is against the established principle of

Election Act, 2017 and polls apart to the rules laid down in Election Commission Rules, 2017.

6. That according to the settled principles, while finalizing delimitation, the distribution of population in geographical sphere contact areas, physical features as well as existing administrative boundaries were liable to be taken into consideration coupled with the facilitation of general public/ voters of the constituency.

GROUND

- a. That the Preamble of the constitution reads as:-

Therein shall be guaranteed fundamental rights, including equality of status, of opportunity and before law, social, economic and political justice, and freedom of thought, expression, belief, faith, worship an association, subject to law and public morality”.

- b. That the supreme consideration of the law is the welfare of people/ masses not anything else but in present case the shape of the newly carved out constituency is not only amazing but also looks that this is not a constituency rather it is a long strip in which the principle mentioned in Section 20 has been bulldozed upon.
- c. That it is worthwhile to mention here, that the length of the fresh constituency NA-87 is more than 110 Kms, whereas, width is quite abnormal. It is significant to submit here that the election commission has wrongly distributed the constituency to ensure the homogeneity. MAP is attached herewith for kind perusal as **ANNEXURE-B**.
- d. That the present census on the basis of which present delimitation of constituencies were formed, lacks accuracy. It is significant to submit here that the district Hafizabad is

living in far flung areas of agricultural units, very far from the villages. The said portion of the population is missing in the said census.

e. That the whole district has been delimited as on constituency which is administratively impossible to handle. It is significant to mention here that the District Hafizabad has 2637 sq Kms area which is humanly impossible for the candidate to look after the people of the constituency and the campaign in this vast area would also be a question which must be addressed wisely.

f. That the time for election campaign is also very short and it is no possible for a candidate to cover whole district in that very period which is given by the election commission. It is also important to mention here that the prescribed expenditure on the campaign are very low as compare to the area of the district and population of the district.

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- g. That the concerned authorities have put the general public in an odd situation. It would be very inconvenience for the public to approach their representative and to point out the problems of the area.
- h. That the delimitation of the constituency according to the new census is a sheer violation of basic human right which is guaranteed by the constitution of Pakistan. Practically, one candidate is representing almost 12 lac people while in the neighboring constituency the situation is otherwise. The mere fact makes it double standard.
- i. That according to the formula share of seat is 1.48 which is 0.02 less than the desired share of seat. The 0.02 share cannot overshadow over 0.48 share of the population. The fact is entirely against the democratic norms of the nation.
- j. That the attitude demonstrated by the concerned official

areas is also poles apart to the popular injunctions/ tenants of Islam particularly MUSAWAT, ADAL and INSAAF, which are hallmarks of Islamic system or other and according to Constitution of Islamic Republic of Pakistan Article 2 A i.e Objective Resolution, Quran and Sunnah would be the supreme law of the Pakistan.

- k. That the petitioner proposed to delimit the whole district into two constituencies which were earlier working properly and better services can be provided to the public.
- l. That applicant reserves his right to rely upon other grounds in support of his contention at the time of arguments.


PRAYER

Under the circumstances elucidated above, it is humbly and graciously prayed that the objection petition may kindly be accepted and the present constituency NA-87 be set aside and the district Hafizabad may kindly be converted into two constituencies of NA-87 and NA-88.


District of the Province of the Punjab, in the interest of justice.

Any other relief, which this Honourable Tribunal deems apt and appropriate, may also be bestowed in favor of the Applicant.

...**APPLICANT**


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Through


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