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**BEFORE THE SECRETARY ELECTION COMMISSION OF  
PAKISTAN**

- Awais Ahmad S/o Abdul Hakeem Advocate R/o Kot Hassan Khan Tehsil & District Hafizabad, presently voter as per preliminary proposed delimitation of constituency PP-69 (Hafiz Abad).

**PETITIONER**

**VERSUS**

- Delimitation Committee, Election Commission of Pakistan, Islamabad.

**RESPONDENT**

**SUB: REPRESENTATION / APPEAL UNDER RULE 12 OF THE  
ELECTION RULES 2017 MADE UNDER THE ELECTION ACT  
2017 AGAINST PRELIMINARY PROPOSED DELIMITATION OF  
CONSTITUENCIES WITH RESPECT TO PP-69 & PP-70  
(HAFIZABAD)**

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**Petitioner respectfully submit as under,**

1. That the Petitioner is resident of Kot Hassan Khan Tehsil & District Hafizabad, presently voter as per preliminary proposed delimitation of constituency PP-69 (Hafizabad), that the petitioner is an advocate by profession and active member of welfare associations (Islahi Committee) and having political background has actively been participating to promote social setup of community of the previous constituency of PP-105 (proposed constituency) Hafizabad.
  
2. That recently the Delimitation Committee has proposed the delimitation of the constituencies under section 20 of Election Act 2017 and the Election Commission of Pakistan has published the preliminary proposal of the constituencies giving a right of objection/representation, under Rule 12 of the Election Rules 2017 made under The Election Act 2017.
  
3. That the Petitioner invoking the provisions of said Rule 12 of the Election Rules 2017 seeks kind indulgence of your honor to review the limits of preliminary proposed constituency PP-69 & PP-70 Hafizabad (previous constituency PP-105) on the following intra-alia grounds,

A That Section 20 of *The Election Act 2017* provides principle of delimitations, the gist of this section is given as und:-

All Constituencies for general seats shall, as far as possible, be limited having regard to the:-

Distribution of population in geographical compact area

Physical features

Existing boundary of the administrative unit,

Facilitie of communication

Public convenience, convence

Other cognate factors to ensure homogeneity in creation of constituencies

B That Rule 10 Sub-Section 5 Election rules 2017 provides That delimitation of constituency of an assembly shall be start from the Northern end of the district and then proceed clock-wise in zig-zag manner.

C That the previous provincial constituency PP-105 contained the patwar circles of "Kot Hassan Khan" and "Wachhoki" (Union Council Kot Hassan, Qanongoi Chak Chattah) but now in the preliminary proposed constituency PP-70, the above said both patwar circles have been excluded from the constituency PP-70 and have been proposed to include in the constituency of PP-69 out rightly against the law and fact, without assigning any reason and this aspect has altogether changed the nomenclatures of previous administrative unit.

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D That previously the voters of two said patwar circles have developed relations with the people of all constituency PP-105(now propose constituency PP-70) having common cohabitation, stream line their system, of communication, harmonized their inhabitant and this fact developed much inclination and devotion with each other.

E That since long the said two patwar circles remained in previous constituency PP-105 and the proposed delimitation of constituencies of PP-69 & PP-70 has altogether changed the physical feature of the constituencies.

F That there was no change in numbers of the previous contituencies of District Hafizabad, hence change in area of any previous constituency was not required, any how, if the exclusion of some Patwar circles from proposed PP-70 and there inclusion into proposed PP-69 was inevitable then the proximate factors demand exclusion of patwar circles "Mangat Niche" & "Muradian" of Qanungoi Hafizabad-II, from proposed PP-70, which fall on Northern Side of the proposed constituency PP-69 & PP-70 and have the equal population to Patwar circle "Kot Hassan Khan" & "Washokie" Qanungoi Hafizabad i.e 18,814(13,372+5,442). to This process definitely evolves the efficacy and importance of sub-rule 5 of the Rule 10.

G That acoording to principles of delimitation provided in Section 20 of the Election Act 2017, convinence of public, geographical compectness of area physical features existing boundries of administrator units and facilties of communication and other cognate



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factors to homogeneity demand that patwar circles of "**Wachhoki**" & "**Kot Hassan Khan**" be included in the proposed constituency PP-70 Hafizabad.

H That while assessing the facility of communication, Patwar circle "**Kot Hassan Khan**" & "**Wachhoki**" having easy approach to Tehsil Office and District Headquarter and all other communication factors favour that these two patwar circle be remained as a part of proposed constituency of PP-70,

I That taking into notice of geographical boundary and taking notice of issue and to maintain an easy access, the above explained factors require to be considered for public convenience.

J That the cognate factors are important factors for the community and these factors are significantly requiring to be considered given importance because the people of patwar circles "**Kot Hassan Khan**", "**Wachhoki**" & proposed constituency PP-70 are almost of same class, temperament and attitude.

K That the marked map is attached herewith.

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## PRAYER

In the light of submission made above it is, therefore, respectfully prayed that by accepting this representation/ appeal and taking into consideration submission made above the delimitation of the proposed constituencies PP-69 & PP-70 be revised for public convenience and welfare of the voters of the said constituencies and patwar circle "Kot Hassan Khan" & "Wachoki" of Qanungoi Chak Chattha which fall on the South side of the said constituencies be excluded from the proposed constituency PP-69 and be included in proposed constituency of PP-70 (Hafizabad), and in sequence of that patwar

circle "Mangat Niche" and "Muradian" (Qanungoi Hafizabad-II) which fall on the North side be included in proposed constituencies PP-69 and excluded from proposed constituency PP-70 according to the Election laws and rules i.e section 20 of Election Act 2017 and Sub-section 5 of section 10 of Election Rule 2017 as the population of Patwar circles "Mangat Niche" & "Muradian" Qanungoi Hafizabad-II i.e 18,814 is almost equal to the population of Patwar circles "Kot Hassan Khan" & "Washokie" Qanungoi "Chak Chattha" i.e 18610.

*Amir Ali*

PETITIONER

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0300-6527858

**Verification:**

Verified on oath at Faisalabad on 30-03-2018 that the contents of this petition are true and correct to the best of my knowledge & correct to my belief.

*Amir Ali*

PETITIONER