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(Signature)
8/10/18
(2-7-15)

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

Rai Imran Hassan son of Zafar Iqbal, resident of P.O Sandhuan Tarar, Thatha Javed Hassan Wala, Tehsil & District Hafizabad. CNIC No.34301-3418831-9, Cell No._____.

.....Petitioner

**REPRESENTATION/OBJECTION AGAINST THE
PRELIMINARY DELIMITATION / DRAFT REGARDING
THE PROVINCIAL CONSTITUENCIES PP-69, PP-70 &
PP-71 DISTRICT HAFIZ ABAD**

Respectfully Sheweth:

1. That the petitioner is resident of above said address and also residing in constituency 69 Jalalpur Bhattian, ID Card and certificate of voter member of constituency 69 is attached herewith.
2. That as per the preliminary delimitation regarding the provincial constituencies District Hafizabad in which the village Kasessay has been included in provincial constituency No.69 and Kalayki MC/QH has been included in PP-70 against the laws, rules, provisions, sections laid down in The Delimitation Rules, 2017.
3. That the preliminary delamination/draft regarding the provincial constituencies of District Hafizabad

i.e. PP-69, PP-70 & PP-71 Hafizabad is against the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017.

4. That the present formulation/preliminary delimitation draft is totally against the existing boundaries compactness of areas, common sources of communication, infrastructures and public convenience, which are the basic and fundamental rules and guidelines for the purpose of delimitation.
5. That Election Commission of Pakistan has negated ignored and deviated as well as violated the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017, which is totally contradictory and opposite to the prescribed formula, laws, rules and provisions, so is liable to be modified, rectified and revised.
6. That the district Hafizabad is consisting upon three (03) provincial constituencies i.e. 69, 70 & 71. PP map and impugned notification are attached herewith as **Annex-C & C1**.
7. That the preliminary draft/delimitation is liable to be modified, rectified and revised upon the following grounds:

GROUNDS:

- a. That three (03) provincial constituencies of district Hafizabad with the formula of total population divided by three (03) and with this average the population of each constituency upon 1,156,957/- population but presently there is a huge difference of population amongst the population of all three provincial constituencies, which is against the golden principle of parity of population. Proposed population data of constituencies is attached herewith as **Annex-D**.
- b. That the population of district Hafizabad consist upon 1,156,957/- and this population must be equally divided upon three (03) provincial constituencies.
- c. That the preliminary delimitation/draft is liable to be modified, rectified and revised as there is no parity of population, compactness of areas with existing boundaries, common source of communication, infrastructure and public convenience and it can be perused in the preliminary delimitation/draft.
- d. That the present preliminary delimitation/draft is gross violation of fundamental rules, principles, provisions and sections laid down as the areas containing to each and every constituency or not

into compact blocks of population in connection with common source of communication, infrastructure, existence of boundaries and public convenience.

- e. That the proposal of the petitioner given below is in accordance with the fundamental rules, principles, provisions and sections laid down in the Delimitation Rules and Act, 2017 keeping in mind and view all the fundamental rules and principles of compactness of areas existing boundaries, sources of communication and in the interest of public convenience.

PROPOSAL:

That the all three (03) constituencies be into compactness of areas, existing boundaries, common source of communication, infrastructure and public convenience with the parity of population as well as the dutiful and feasible distribution of areas and population.

• **PP-69 Hafizabad-I**

i.	Kasesey	70,879
ii.	Jalal Pur Bhattian	70,592
iii.	Jalal Pur Bhattian MC	40,755
iv.	Shoyanwala	53,779
v.	Wanikitrar	54,910
vi.	Kolotarar	65,004

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15/03/18

Total Population

355,919/-

• **PP-70 Hafizabad-II**

i.	Hafizabad MC	245,784
ii.	Hafizabad QH	36,626
iii.	Hafizabad QH2	31,898
iv.	Chak Chatta	98,189

Total Population

412,497/-

• **PP-71 Hafizabad-III**

i.	Sukhaykimandi MC	42,626
ii.	Kot Nakka	93,642
iii.	Pindi Bhattian MC	55,515
iv.	Pindi Bhattian QH	54,407
v.	Kalaykimandi QH	59,376
vi.	Kalaykimandi TC	18,171
vii.	Sukhaykimandi QH	64,806

Total Population

388,543/-

That the above mentioned proposal is very close to the compactness of areas, parity of population, existing boundaries, and common source of communication, infrastructure and public convenience, as the population data along with proposed map is the part of proposal of the petitioner.

PRAYER:

In the circumstances mentioned above, it is humbly prayed that by accepting this memorandum petition, all the three

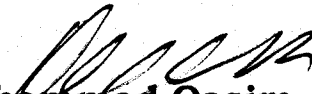
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Imran
31/03/18

(03) provincial constituencies of district Hafizabad may kindly be delimited and formulated under the proposal of the petitioner keeping in view the population data and proposed map of district Hafizabad in the interest of public and justice.

Petitioner
Rai Imran Hassan

Through


Muhammad Qasim Jatoi
Advocate High Court