

March 31, 2018

The Secretary
Election Commission of Pakistan
G-5/2, Constitution Avenue, Islamabad.

M 02/04/2018

Subject: **LEGAL OBJECTIONS AND PROPOSALS OVER THE PRELIMINARY LIST OF NATIONAL ASSEMBLY CONSTITUENCIES OF DISTRICT NAUSHAHRO FEROZE**

Dear Sir,

The undersigned applicant submits as under: -

1. With reference to Notification No.F.8(3)/2018-Elec-I dated 5th March, whereby Hon'ble Commission will hear and decide the objections / representations under sub-section (4) of Section 21 of the Elections Act, 2017 in connection with Preliminary list of National and Provincial Assembly Constituencies of Pakistan.
2. That the criteria for delimitation of National and Provincial Assembly Constituencies is laid down in sub-section (1) of Section 20 of the Elections Act, 2017 is as under: -
"All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies."
3. In view of above discussion, I hereby submit my **LEGAL OBJECTIONS** and **PROPOSALS** to preliminary list of National Assembly constituencies namely NA-211 Naushahro Feroze-I and NA-212 Naushahro Feroze-II.

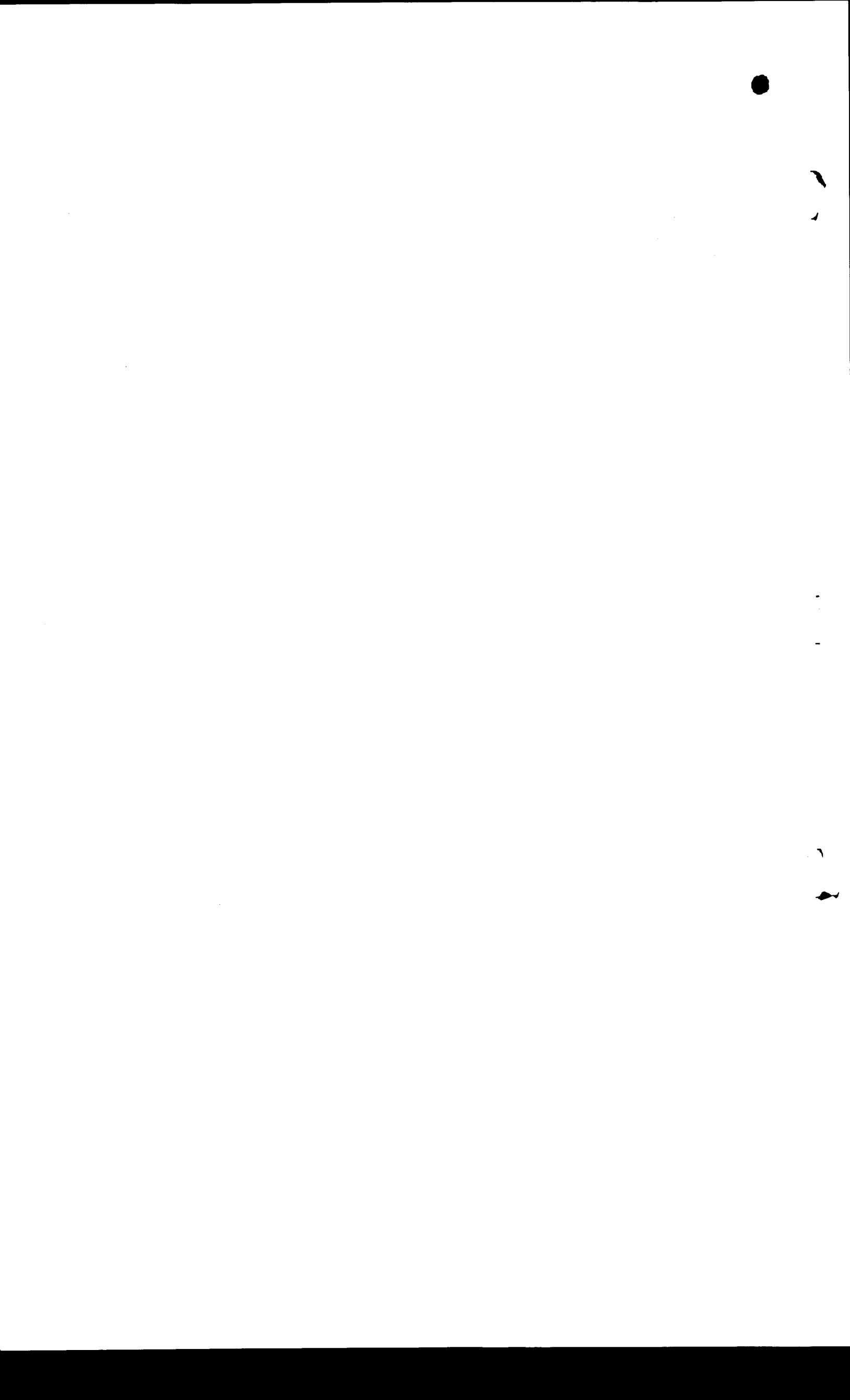
LEGAL OBJECTIONS

4. The Preliminary list of National Assembly constituencies of district Naushahro Feroze have been made in violation of sub-section (1) of Section 20 of the Elections Act, 2017.
 - A. The difference of population is **34,355** between NA-211 Naushahro Feroze-I having population 7,89,009 being smaller and NA-212 Naushahro Feroze-II having population 8,23,364 being bigger.
 - B. The population of the proposed NA-212 Naushahro Feroze-II is not in conformity with population criteria.
 - C. That preliminary list of constituencies proposed by Delimitation Committee are in conformity with geographically compact area, facilities of communication, public convenience and other cognate factors to ensure homogeneity and thus fulfilling the requirements contained in sub-section (1) of Section 20 of the Elections Act, 2017 **except population criteria.**

WITHOUT PREJUDICE to above legal objections, Constituency-Wise Proposals are as under: -

PROPOSAL

- 1) **PROPOSED NA-211 NOUSHAHRO FEROZE-I**
 - (a) Kandiaro Taluka = **3,22,439**
 - (b) Mehrabpur Taluka = **2,47,280**
 - (c) Bhiria Taluka excluding following areas:
 - (i) TC Mad Aleem of STC Bhiria = 27,659
 - (ii) TC Tharushah of STC Bhiria = 10,769
 - (iii) TC Molhan of STC Bhiria = 11,541
 - (iv) TC Dalipota of STC Bhiria = 14,448
 - Total: 3,01,044 - 27,659 - 10,769 - 11,541 - 14,448 = 2,36,627**
- @ **Grand Total: 3,22,439 + 2,47,280 + 2,36,627 = 8,06,346 i.e. 50.01%**



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- 2) **PROPOSED NA-212 NOUSHAHRO FEROZE-II**
 (a) Moro Taluka = 3,68,789
 (b) Naushahro Feroze Taluka = 3,72,821
 (c) The following areas of Bhiria Taluka included:
 (i) TC Mad Aleem of STC Bhiria = 27,659
 (ii) TC Tharushah of STC Bhiria = 10,769
 (iii) TC Molhan of STC Bhiria = 11,541
 (iv) TC Dalipota of STC Bhiria = 14,448
Total: 27,659 + 10,769 + 11,541 + 14,448 = 64,417

@ **Grand Total: 3,68,789 + 3,72,821 + 64,417 = 8,06,027 i.e. 49.99%**

Copy of the proposed Map of National Assembly constituencies of District Naushahro Feroze is attached herewith for ready reference.

I look forward to hearing from you and hope that your goodness will take some necessary action in this matter and do needful in this regard.

Thanking you.

Yours Sincerely,

y
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