

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

REPRESENTATION BY:

SARDAR SHER MUHAMMAD KHAN RIND BALOCH,
son of Haji Sardar Khan Rind Baloch, resident of Village
Sardar Sher Muhammad Khan Rind Baloch, Post Office
Nawabshah Deh 90-Nasrat, Tehsil Nawabshah, District
Shaheed Benazir Abad, Sindh. Through Special Attorney:
Mehmood ul Hassan son of Muhammad Ismail, Resident of
Tehsil Nawabshah, District Shaheed Benazir Abad, Sindh.

Handwritten signature and date: 02/09/2018

AGAINST THE PRELIMINARY DELIMITATION OF:

**NATIONAL ASSEMBLY CONSTITUENCY NA-213 DISTRICT
SHAHEED BENAZIR ABAD-I, SINDH, UNDER SECTION 21(3) OF
THE ELECTIONS ACT 2017 READ WITH RULE 12 OF THE
ELECTION RULES 2017.**

Respectfully Sheweth:

1. That the petitioner is a registered voter in the constituency NA-213. (A certificate showing petitioner's registration as a voter at serial Number 608, Gharana Number 299, Electoral Area 90-Nasrat Tehsil Nawabshah, District Shaheed Benazir Abad, Sindh duly certified by District Election Commissioner Shaheed Benazir Abad has been attached).
2. That pursuant to the provisions of Article 222(b) of the Constitution of Islamic republic of Pakistan, Section 21 of the Elections Act 2017 read with Rule 11 of the Election Rules, 2017, the Election Commission of Pakistan (ECP) has published a preliminary report and the list of constituencies in respect of National Assembly of Pakistan.
3. That after new census and 24th Amendment in the Constitution the ECP in pursuance of the powers under Section 17 of the Elections Act 2017 read with Rule 7 of the Election Rules, 2017 carried out the exercise of delimitation.

(P.T.O)



10/2/2018

4. That although ECP has taken seriously its responsibility to delimit the constituencies bestowed upon it by the constitution yet few errors and illegalities have been made by the concerned while delimiting the constituency Number NA-213 of National Assembly which may result into grave injustice and may prejudice the efforts to organize elections honestly, fairly and in accordance with law.
5. That TC Abul Hassan, TC Liyari and TC Daur were historically a part and parcel of NA 213 but against the wishes of the inhabitants of these Tapedar Councils they have been excluded from NA-213 and made a part of NA-214 whereas TC Kubar, TC Tallo, TC Gaban, TC Chanessar, TC Bhooral, TC Ahmad Shah, have been included in NA-213 which has changed the complexion of NA-213 and raised its population to 819074 as per official figures. (Map Annexure "A")
6. That the principles mentioned in Section 20 of the Act, especially communication and public convenience and other cognate factors to ensure homogeneity, have not been followed in letter and spirit. Few Tapedar Circles have been broken in sheer violation of Rule 10(4) of the Election Rules 2017.
7. That it is in the interest of free and fair election to include the areas marked in the Map Annexure "B" i.e. **TC ABUL HASSAN, TC LIYARI AND TC DAUR**, which were part and parcel of NA 213 in the previous elections, in the constituency of NA-213 in accordance with the wishes of the inhabitants of these Tapedar Councils whereas TC Kubar, TC Tallo, TC Gaban, TC Chanessar, TC Bhooral, TC Ahmad Shah, be included in NA-214 in order to ensure homogeneity in the creation of both the constituencies ensuring that the population of the both constituencies may become almost equal.
8. That other grounds, as deemed necessary, shall be raised at the time of hearing.

Petitioner,

Through:



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