

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

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03-04-18

RE: REPRESENTATION UNDER SECTION 21(3) OF THE ELECTIONS ACT 2017 READ WITH RULE 12 OF THE ELECTION RULES 2017 WITH RESPECT TO NA-215, NA-216 AND NA-217 DISTRICT SANGHAR

It is respectfully submitted that:

1. The undersigned Applicant is a registered voter of NA-217, District Sanghar, permanently residing in Taluka Tando Adam, District Sanghar. Copies of the Applicant's CNIC and registered vote certificate are attached as **Annex A-1 and A-2**.
2. On 05.03.2018, the Election Commission of Pakistan ("ECP") issued the preliminary proposed delimitation for NA 215, NA 216 and NA 217, District Sanghar ("**preliminary delimitation**"). Copy of the detail preliminary delimitation for NA 215, 216 and 217 along with true copy of delimitation map are attached as **Annex B-1 and B-2**.
3. The preliminary delimitation is in accordance and conformity with the provisions of the Election Act, 2017 ("Act 2017") and Election Rules, 2017 ("Rules 2017"). It adheres to basic principles of delimitation as the ECP has given due regard to the distribution of population, physical features, existing boundaries of administrative units, facilities of communications and most importantly public convenience.
4. The preliminary delimitation is in consonance with Section 20 of the Act 2017 read with the proviso to Rule 10(5) of the 2017 Rules. The variation in population among NA 215, 216 and 217 is less than 10%. The total population as mentioned in the preliminary delimitation is:

- A. NA 215 = 696,316
- B. NA 216 = 667,156
- C. NA 217 = 693,585

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As a consequence, the constituencies have roughly similar populations, which is in keeping with the guidelines prescribed in the Act 2017 and Rules 2017 for delimitation of constituencies.

5. More importantly, as a result of this delimitation, each NA constituency has exactly two PA constituencies under it; no PA constituency straddles across two or more NA constituencies. This is, in fact, the first time that this has been achieved. For instance, previously, PS 81 (presently PS 43) straddled across two NA constituencies, NA 235 (presently NA 216) and NA 234 (presently NA 215). There is no such overlap of PA constituencies in the preliminary delimitation. NA 215 includes PS 41 and 46, NA 216 includes PS 42 and PS 43 and NA 217 includes PS 44 and 45. This greatly strengthens the vote of the persons in these PA constituencies, since each such constituency will now also vote for the same NA constituency. The voters of the area will, therefore, get more effective representation in the National Assembly.
6. The preliminary delimitation also closely follows the earlier existing delimitation and creates the least possible disturbance in existing voting blocks. Elected officials and aspiring candidates have all been working in the District on the basis of the existing earlier delimitations. Voters have been identifying themselves with particular constituencies and evaluated elected officials and aspiring candidates on this basis. By following the earlier existing delimitation as closely as possible, the preliminary determination minimizes confusion among voters and fragmentation of votes. A drastic change in the delimitation of constituencies only a few

months before the election would have led to chaos and resulted in disenfranchising voters by creating confusion and fragmentation.

7. The preliminary delimitation fulfills the requirements of Rule 10(5) of the 2017 Rules. It has been drawn in accordance with the law and in the interests of the voters of District Sanghar.

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8. In case the ECP requires, the Applicant is available to make more detailed submissions in support of the preliminary representation, in writing or orally, at any time convenient to the ECP.

**PRAYER**

It is, therefore, respectfully prayed in the interest of justice that that the preliminary delimitation of the ECP issued on 05.03.2018 with respect to NA 215, 216 and 217 may be maintained without any change and issued as the final delimitation for District Sanghar.

It is further prayed that if the ECP holds any hearing in relation to any objections to or any representation against the preliminary delimitation of District Sanghar, it may kindly provide the Applicant an opportunity to attend the hearing and address the ECP.

*Mohd Arif*

Mohammad Arif  
S/o Malik Allahyar  
Resident of Taluka Tando Adam  
District Sanghar  
CNIC No. 44206-9236635-1

Islamabad  
Dated: 3<sup>rd</sup> April 2018

*Beshwari*

ADVOCATE FOR THE APPLICANT