

Before the Secretary,
Election Commission of Pakistan,
Islamabad.

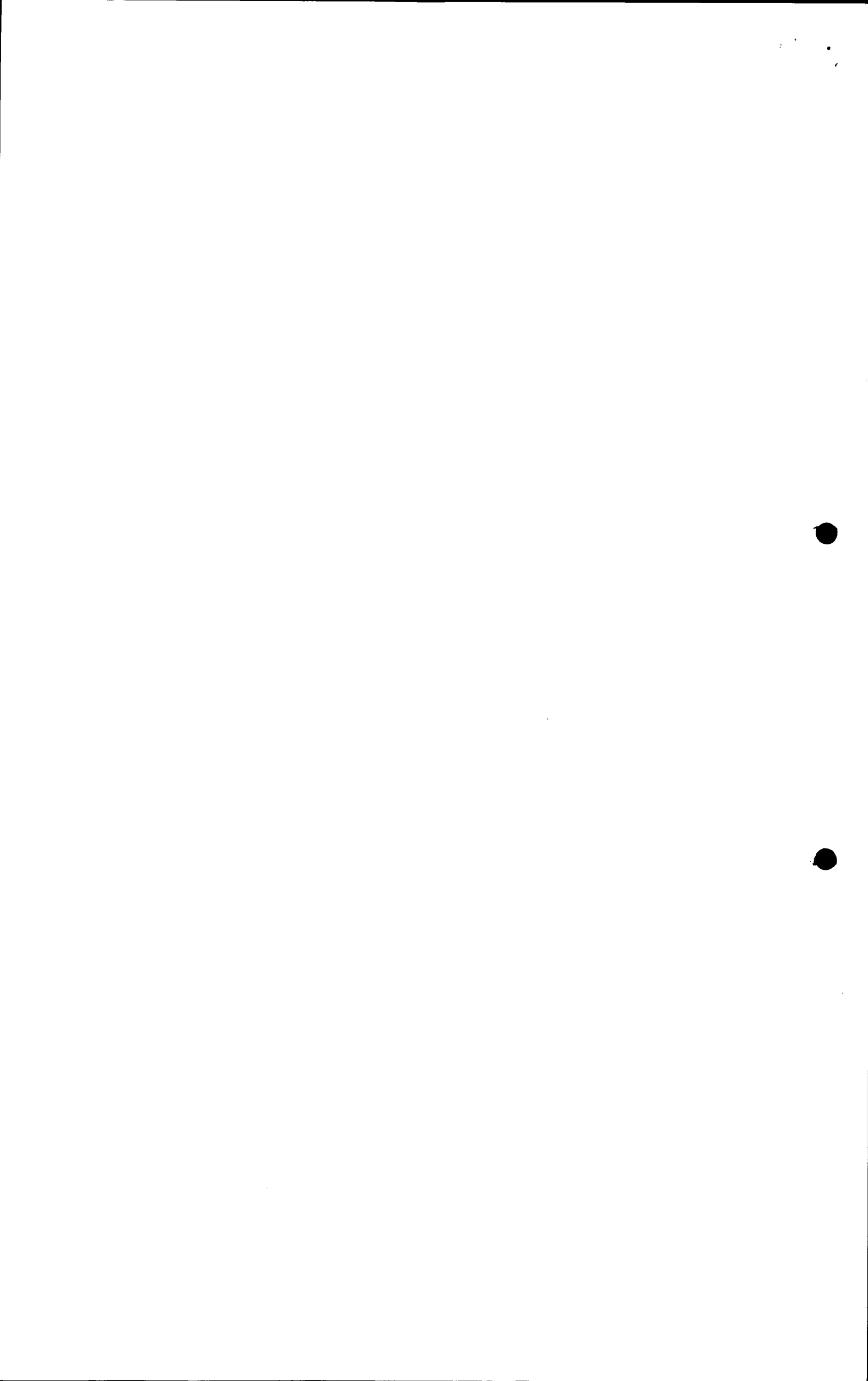
102/09/2018
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PETITION OF OBJECTIONS

Respected Sir,

The petitioners, above-named, most respectfully and very humbly, submit as under:-

1. That the petitioners are the resident and voters of NA-243, 244 and 245 and have gone through the fresh Delimitation of the Constituencies as announced by the Election Commission which according to Election Commission is described in annexed schedule.
2. That the Delimitation as marked by the Election Commission is not in accordance with the policy of Election Commission in respect of Geographical Compactness of a Constituency. Whatever Delimitation made by the Election Commission in respect of NA-243, 244 and 245 is not correct in respect of Geographical Boundaries as in NA-243 two charges of Jamshed Town were introduced by breaking the boundaries, otherwise, the same is very different and distinct and the Geographical Boundaries is still not completed or



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compact. Therefore, in order to remove such defect, I propose to include Charge # 41212 and 41213 of Jamshed Quarters Sub-Division in NA-244 and by doing this, complaints and difficulties of public shall be removed and administrative boundaries shall be maintained. In order to equalize the population as required for NA then Circle # 4, 5 & 6 of charge # 14 be included in NA-243 from NA-245, which having a population of 43839 which not only equalize the population ration but also materialized the boundary.

NA-244

3. For NA-244, as we have already proposed that charge # 41212 and 41213 and circle # 123 of charge # 14 be included in NA-244, therefore, in order to minimize the difficulties and in order to maintain boundaries and geographical structure, then charge # 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15 of Ferozabad Sub-Division be separated from NA-244 and be included in NA-245 and charge # 1 to 13 of Jamshed Quarter Sub Division of NA-245 be included in NA-244.

NA-245.

11/02/04/2015

4. As we have already proposed that charge # 1 to 10, 11 and 14 of Jamshed Quarter Sub-Division of NA-245 be included in NA-244 and charge # 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15 of Ferozabad Sub-Division be included in NA-245. By doing this NA would comprised over charge # 1 to 24 of Ferozabad Sub-Division with a population of 722354 and if such proposal is accepted, it would maintain the geographical boundaries of the areas without disturbing any person and it is also for administrative purpose.

5. The demarcation as made by the Election Commission of NA-244 and 244 is based on vertical distribution which resulted into differences in the populations and creating ethnic differences which is also against the decision of Hon'ble Supreme Court of Pakistan reported in PLD 2011 Supreme Court 997 that the demarcation shall not be for the benefit of any political party but based on smooth population and multi-linguistic areas. The relevant portion of the judgment is reproduced as under:-

"Further observe that to avoid political polarization and to break the style of ethnic

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strife and turn war, boundaries of administrative units like police stations, revenue estates, etc., ought to be altered so that the members of different communities may live together in peace and harmony, instead of allowing various groups to claim that particular areas belong to them and declaring certain areas as NO GO areas under their fearful influence. Subsequent thereto, on similar considerations, in view of relevant laws, delimitation of different constituencies has also to be undertaken with the same object and purpose, particularly to make Karachi, which is the hub of economic and commercial activities and also the face of Pakistan, a peaceful city in the near future. The Election Commission of Pakistan may also initiate the process of its own in this behalf."

6. That prior to the fresh Delimitation, old NA 252 and 253 were demarcated in a way that entire Jamshed Town was situated in one constituency and Gulshan Town in other constituency whereas in the fresh setup, areas of two towns have been amalgamated and distributed in NA-243 and 244 which are geographically not compact neither they are easy accessible for the public but they are disturbing ethnic population.

7. That the majority of Urdu Speaking population is residing with the people of other languages but the

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So in order to create harmony among the different languages and maintaining geographical setup, undersigned is proposing the Delimitation of the above referred constituencies as per annexed schedule. Therefore, you are requested that by considering all the above facts, geographical conditions and law of demarcation, the demarcation of NA-243, NA-244 and NA-245 may be amended in such a way, as proposed in the annexed schedule for which we shall be very grateful.


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