

dated: 02.04.2018

To,
The Honourable secretary,
Election commission of Pakistan
Islamabad

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1-6
02/04/2018

Subject: **MEMORANDUM OF REPRESENTATION AGAINST THE
PRELIMINARY DELIMITATION OF CONSITUENCIES OF
DISTRICT WEST KARACHI UNDER SECTION 21 SUB
SECTION 2 OF ELECTION ACT 2017**

REPRESENTATOR/VOTER,

1. HAJI AMAN KHAN AFRIDI S/O REHMAT GUL AFRIDI
R/O house no 1726/683 Sarhad Afridi colony
Baldia Town Karachi west.

Respected sir,

I am voter and resident of national assembly constituency NA-249 sub-division Baldia Karachi west most humbly and respectfully brings the following objection for your kind consideration on preliminary delimitation by election commission authorities as well as in pursuance of rule 12 of election rules 2017 annexures relevant proposed maps of entire district with memorandum.

For the support of my representation and satisfaction of Honourable Commission draw your kind attention on section 20 of election act 2017 read with rule 10 of Election rules 2017 the relevant provision of laws are reproduced as follows:

"20. Principles of delimitation. (1) 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.

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.

(2)

(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order."

"10. Draft proposals for delimitation of constituencies—(1) A Delimitation Committee constituted under rule 9 shall, immediately after its constitution, proceed to obtain from Pakistan Bureau of Statistics, population data of last census officially published along with relevant maps showing therein census charges, census circles and census blocks along with description, relating to a Province, a district, an agency, or any other administrative or revenue unit as it may require.

(2) The Delimitation Committee shall also obtain district maps along with description, duly authenticated by Pakistan Bureau of Statistics, or, as the case may be, the district head of Revenue Department, prepared on a uniform scale as may be determined by the Commission indicating therein details of all administrative and revenue units in the district to the level of a Patwar Circle or, as the case may be, a Tapedar Circle, as well as prominent geographical and physical features, such as rivers and mountains and any other information as may be determined by the Commission or required by the Committee.

(3) In preparing draft proposals for delimitation of constituencies, the Delimitation Committee shall follow the principles of delimitation as laid down in section 20, procedure given in this Chapter and the guidelines provided by the Commission from time to time.

(4) The constituency for an Assembly shall not ordinarily extend to more than one district except in exceptional circumstances for reasons to be recorded by the Delimitation Committee:

Provided that a Patwar Circle or, as the case may be, a Tapedar Circle shall be the basic unit for delimitation and it shall not be broken under any circumstances:

Provided further that in case of urban areas census circle shall not be broken under any circumstances.

(5) As far as possible, the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or, as the case may be, the Agency and then proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota: 7

Provided that the quota under this sub-rule shall be determined by dividing total population of the district or the agency with number of seats allocated to that district or agency:

Provided further that the variation in population between two or more constituencies shall not ordinarily exceed ten percent and the Delimitation Committee shall record reasons if, in exceptional circumstances, the variation has to exceed the limit.

(6) For the purpose of preparation of draft proposals for delimitation, the

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Delimitation Committee may require assistance from any Federal, Provincial or, as the case may be, a Local Government Authority.

(7) After the draft proposals for delimitation of constituencies are finalized on Form-5, the Delimitation Committee shall send the same to the Commission, within the time specified and in the manner as may be determined by the Commission".

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20/1/2016

OBJECTIONS:

1. It is submitted that charge no 13 and 15 of baldia sub-division was excluded from NA-249 and same shall be included in NA-248.
2. It is submitted that charge no 1 Mominabad sub-division included in NA-249 shall be excluded from NA-249 and shall be included in NA-251.

GROUNDS FOR OBJECTIONS:

1. That total population of baldia sub-division is 832768 according to census and total population of district west is 3914757 after division with 5 National assembly constituencies it will be 782951 that's means 49816 over population in baldia sub-division have to give another administrative unit.
2. Charge 13 of baldia sub-division have total population 49330 and charge 15 have total population 78050.
3. According to above mention rule 10 sub-rule 4 of election rules 2017 a census circle or charge shall not broke in any circumstances it shall be applies on administrative unit like sub-division when a sub-division completes its population its must be in same constituency.
4. For the sake and welfare and public convenience and other cognate reasons and creation of homogeneity sub-division Baldia Karachi west must not be broken in like preliminary delimitation which is clearly mention in section 20 principles of delimitation of election act 2017.
5. It is pertinent to mention that Honourable commission may exclude charge of mominabad sub-division from NA-249 and include in NA-251 because it is also include in PS-118.

6. Geographically compact is very important being attached and situated on hub river road.

As per Election commission of Pakistan published the preliminary delimitation on form-5 are as follows:

(5)
10/04/2018

ELECTION COMMISSION OF PAKISTAN

Form 5

DRAFT LIST OF CONSTITUENCY

National Assembly Karachi West-II (Sindh).

No. and Name of Constituency	Proposal of the Constituency	Population
NA-249 Karachi West-II	a) The Following Census Charges of Baldia Sub-Division:-	
	i) Censes Charge No.1	63183
	ii) Censes Charge No.2	69306
	iii) Censes Charge No.3	16275
	iii) Censes Charge No.4	32654
	iii) Censes Charge No.5	29039
	iii) Censes Charge No.6	22114
	iv) Censes Charge No.7	42358
	v) Censes Charge No.8	38929
	vi) Censes Charge No.9	43086
	vii) Censes Charge No.10	30725
	ix) Censes Charge No.11	38754
	x) Censes Charge No.12	39050
	xii) Censes Charge No.14	52453
	xiii) Censes Charge No.16	39343
	xv) Censes Charge No.17	122147
	xvi) Censes Charge No.18	25972
	b) censes charge no.1 mominabad subdivision district west	77388
	Total:	782776

Proposed list for constituency herein below and proposed maps of entire district also attached.

Moy/04/2018

ELECTION COMMISSION OF PAKISTAN

PROPOSAL LIST OF CONSTITUENCY NA-

249


National Assembly Karachi West-II (Sindh).

No. and Name of Constituency	Proposal of the Constituency	Population
NA-249 Karachi West-II	a) The Following Census Charges of Baldia Sub-Division:-	63183
	i) Censes Charge No.1	
	ii) Censes Charge No.2	
	iii) Censes Charge No.6	69306
	iv) Censes Charge No.7	22114
	v) Censes Charge No.8	42358
	vi) Censes Charge No.9	38929
	vii) Censes Charge No.10	43086
	ix) Censes Charge No.11	30725
	x) Censes Charge No.12	38754
	xi) Censes Charge No.13	39050
	xii) Censes Charge No.14	49330
	xiii) Censes Charge No.15	52453
	xiv) Censes Charge No.16	78050
	xv) Censes Charge No.17	39343
	xvi) Censes Charge No.18	122147
		25972
	Total:	754800

SUGGESTIONS/PRAYERS:

1. It is suggested and prayed that charge no 13 and 15 of baldia sub-division be included in NA-249 and same shall exclude from NA-248.
2. That charge no1 of sub division of Mominabad be excluded from NA-249 and shall be included in NA-251.
3. It is submitted that total population of baldia sub-division is 832768 and in case it is necessary to adjust the population of NA-248 That charge no 3,4 and 5 of baldia sub-division may excluded from 249 and shall include into 248 due to quota extend to population.
4. Therefore with due respect this Honourable commission may be pleased to allow this representation and accept this proposal for the largest interest of justice and public convenience and benefit of other sub-division/taluka as well.

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Authorized Person / Attorney

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21/04/2013