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To,

The Secretary,
Election Commission of Pakistan,
Islamabad.

Subject:

REPRESENTATION U/S 21(3) OF THE ELECTION ACT, 2017 AGAINST THE PRELIMINARY DELIMITATION OF THE CONTITUENCY IN RESPECT OF NA-249 (PS-116), NA-250 (PS-114, PS-120) AND NA-251 (PS-117 & PS-119) NOTIFIED ON 05.03.2018

Respected Sir,

With reference to notification No. F.8(3)/2018-Elec-I dated 05.03.2018, regarding publication of preliminary report of delimitation of constituencies of National Assemblies and Provincial Assemblies, we hereby filed objections against the above said preliminary delimitation of national and provincial constituencies NA-249 (PS-116), NA-250 (PS-114, PS-120) AND NA-251 (PS-117 & PS-119) as under:

- i. That the principles laid down in section 20 of the Election Act, 2017 and rule 12 of the Election Rules, 2017 have not been complied with in stricto-senso.
- ii. That geographically compact area cannot be construed only to the thickly populated area but it has vast meaning which includes cultural values, norms and tribal distribution as well. Since in Karachi City is the largest city of the country comprising on different communities and tribes. They were living together since the creation of Pakistan amicably but unfortunately some foreign agencies created/promoted these distributions which caused violence in the city and now one of the neighbourer has great hatred with his neighbourer who belongs to other community. Unfortunately the preliminary delimitation which has been made without considering the above facts which is most important factor to keep peace, harmony and brotherhood among the residents of constituencies. Some of the areas are called Pakhtun Belt and some are called MQM Belt, who cannot bear each other. Though

after successful operation launched by the LEAs/IAS in Karachi, law and order situation has become satisfactory but it is not a permanent solution and if the preliminary delimitation remains intact, there are more possibilities that the previous group in order to dominate will again become active. In order to curb all the above factors, it would be appropriate that proposed amendments in the delimitation may kindly be approved.

- iii. That the next principle of delimitation is physical feature which is also correlated with the first one.
- iv. That the industrial area i.e. Site Area consists of labourers who belongs to different provinces of the country and residing nearest their working places i.e. Mills/Factories. Contrary to this the other communities who are residing on the other side of the Railway track/road have different set of minds, they may be businessmen, government servants or affiliated with any other profession so there is hell of difference between such communities.
- v. That most important fact which determines all other factors is facility of communication and public convenience. In the instant case public road transport facilities between the proposed delimitation are much better than the preliminary delimitation. Resultantly all the inhabitants shall suffer an irreparable loss on account of education and health if the preliminary delimitation kept intact. On this score alone, the demand of petitioner is prima facie and merits consideration.
- vi. So far as cognate factor is concerned, naturally the people have relations with the people where they feel convenient and have communication facilities. Accordingly the justification given in sub-para (i) above, is sufficient to clear the ground realities of the above constituencies and there is no need to further elaborate cognate factor.
- vii. That the rule of northern end has also been violated in all the constituencies, which is against the natural justice. All the laws are made for the welfare/facilitation of general public and not to bother the public.

viii. Apart from above, it has also been laid down in section 20(4) of the Election Act, 2017 that if the limit of 10% is exceeded in any case, the commission can do so after recording the reasons. The condition is last one in the above section meaning thereby that the Authors of the law were much conscious about the priorities of the legislation, first they have given the basic principles which are primary conditions and then the later one was given place in the section. If the primary conditions are fulfilled, the later one can be relaxed by, the Honourable Commission. Needless to say that relaxation in this sub-section has been extended to an urban area of Punjab province which is a developed city whereas Karachi has different communities, tribes and the most alarming is sectarian violence, therefore, Karachi deserves for this relaxation more than that city. All the pre-requisites of the concerned section read with relevant rule have been complied with in the proposed delimitation of above said national and provincial constituencies of Karachi District.

ix. It is worthwhile to mention here that the population of Karachi district has not been so increased due to which a new constituency was required to be delimited and only minor changes were required but unfortunately the delimitation of 3 NA's constituencies has been disturbed. Contrary to this in other districts where there is minor changes involved, only one patwar circle or two have been excluded/included from that constituency. The example of District Chakwal is very important and in this way Article 25 of the Constitution of Islamic Republic of Pakistan, 1973 has been violated. There are many other examples in the proposed notification of delimitation, where the previous delimitation was kept intact with slightly amendments, accordingly the petitioners have to be treated at par. All the citizens of Pakistan are entitled for equal treatment but this principle has not been adhered to while delimiting the constituencies of Karachi West District.

Preliminary Delimitation			Proposed Delimitation		
Constituency No.	Description	Population	Constituency No.	Description	Population

NA-249 Karachi West-II	a)The following census charges of Baldia Sub-Division:-		NA-249 Karachi West-II	a)S.D Baldia charge 4087 Ittehad Town;	122147
	i.Census Charge No.1	63,183		b)S.D Orangi	41621
	ii.Census Charge No.2	69306		i.Charge 40909 Data Nagar Orangi, Naseemabad;	
	iii. Census Charge No.3	16275		ii. Charge 40910, Ali Garh colony, Gulfamabad;	31395
	iv. Census Charge No.4	32654		iii. Charge 40911, Orangi Sector 1-A, Gulshan Abad Sector 1-C, Bokhari Colony;	30158
	v. Census Charge No.5	29039		c)S.D Mominabad-1, Charge No.43810 to 43821, 22, 23, 24, 25, 26, 27 & 28:-	
	vi. Census Charge No.6	22114		i.Charge No.10, Baba Wilayat Shah Colony;	20945
	vii. Census Charge No.7	42358		ii. Charge No.11, Saleemabad, Sector 11-1/2, Iqbal Baloch Colony, Minnat Colony, Hashmi Colony;	36933
	viii. Census Charge No.8	38929		iii.Charge No.12, Baba Wilayat Ali Shah;	24854
	ix. Census Charge No.9	43086		iv.Charge No.13, Ghazi Abad, Mujahid Colony, Sector 11-1/2;	21461
	x. Census Charge No.10	30725		v.Charge No.14, Ghazi Abad, Mujahid colony;	28693
	xi. Census Charge No.11	38754		vi.Charge No.17, Gulshan Bihar Sector 16, Ittehad colony;	18943
	xii. Census Charge No.12	39050		vii.Charge No.18, Mohammad Mustafa Colony, Chishti Nagar;	24825
	xiii. Census Charge No.14	52453		viii.Charge No.19, Shah Wali Ullah Nagar, 11-1/2;	29137
	xiv. Census Charge No.16	39343		ix.Charge No.20, Mansoor Nagar, Yaqoob Abad;	20291
	xv. Census Charge No.17	122147		x.Charge No.21, Raja Tanvir colony, Tori Bangash Colony;	27878
	xvi. Census Charge No.18 and	25972			
b) Census Charge No.1 of Mominabad Sub-Division of District Karachi West.	77388				

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				xi.Charge No.24, Johar Chowk Orangi Sector 14-G, Sir Syed Colony;	24464
				xii.Charge No.25, Mohammad Mustafa Colony, Benazir colony;	27656
				xiii.Charge No.22, Bangla Bazar, Orangi 15-C;	23185
				xiv.Charge No.23, Shah Khalid Colony, 14-B, Anjum Nagar;	29841
				xv.Charge No.26, Aziz Nagar, Ghosia Block, Iqbal Baloch Colony, Orangi 12-L, Thorani Goth;	31304
				xvi.Charge No.27, Orangi 12-L, Gharibabad Colony;	32782
				xvii.Charge No.28, Mooria Goth. 12-L, Junaid Colony 9-D, Orangi 12-C;	20995
				d)S.D Orangi Charge No.40907, 8	
				i.Charge No.7, Gabool Colony;	15921
				ii.Charge No.8, Jinnah Colony 9-E, Banaras Colony;	26014
				e)S.D Mominabad Charge No.7, Orangi Sector 11-E, 11-A, Sabri Chowk, Farooq Colony;	27230
		Total	782,776	Total	738,673
PS-116 Karachi West-V	The following Census Charges of Baldia Sub- Division:-		PS-116 Karachi West-V	Existing population	346432
	i.Census Charge No.1	63183		S.D Baldia (PS-116) Charge 40801 Abidabad	(63183)
	ii. Census Charge No.2	69306		S.D Mominabad (PS- 117) Charge No.43810, Baba Wilayat Ali Shah	+20945
	iii. Census Charge No.14,	52453			
	iv. Census Charge No.16 and	39343			
	v. Census Charge No.17	122147			+24854

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	of District Karachi West.			Charge No.43812, Baba Wilayat Ali Shah	
	Total	346,432		Total	353,170
NA-250 Karachi West-III	a)Site Sub-Division excluding Census Charge No.1	343318	NA-250 Karachi West-III	a) S.D Site Excluding i.Charge No.1, 3 & 4 (40702 to 40709):-	
	b)The following Census Charges of Orangi Sub-Division:-			ii.Charge No.2 Shershah Block A Muhammadi Road	33077
	i.Census Charge No.1	67289		iii.Charge No.5 Bawani Chali GCT Colony Labour Square	39906
	ii. Census Charge No.2	48656		iv.Charge No.6 Hasrat Mohani Colony	29988
	iii. Census Charge No.3	33955		v. Charge No.7 Asif Colony, Wilayat Abad	33115
	iv. Census Charge No.4	30405		vi. Charge No.8 Central Muslimabad Noor Muhammad Village	39227
	v. Census Charge No.5	81780		vii.Charge No.9 Rexer Line old Golimar Jehanabad	50799
	vi. Census Charge No.6	43298		b)S.D Baldia Charge 40803 to 40812 and 40818:-	
	vii. Census Charge No.9	41621		i.Charge No.40803 Delhi Colony, Gujrat colony	16275
	viii. Census Charge No.10	31395		ii. Charge No.4, Hussain Nagar, Rasheedabad	32654
	ix. Census Charge No.11 and	30158		iii.Charge No.5, Anjum Colony;	29039
	x. Census Charge No.12	70117		iv. Charge No.6, Habibabad, Gujrat Colony;	22114
	of District Karachi West			v.Charge No.7, Ghous Nagar, Muslim Mujahid Colony;	42358
				vi.Charge No.8, Madina Colony Baldia;	38929
				vii. Charge No.9, Saeed Abad, B.C.D;	43086
				viii.Charge No.10, Saeed Abad, 5-G, A-8;	30725
				ix.Charge No.11, New Abadi Sector;	38754

				x.Charge No.12, New Abadi Sector 8-B Saeedabad;	39050
				xi.Charge No.18, New Saeedabad, Sector 9-A, 9-B, 9-F, 9-D, 9-E;	25972
				xii.Charge No.40801 Abidabad;	63183
				xiii. Charge No.2, Gulshan Ghazi	69306
				xiv. Charge No.14, Sector 17-B;	52453
				xv.Charge No.16, Qaimkhani Colony, Nawab Colony;	39343
		Total	821,992		
				Total	809,353
PS-114 Karachi West-III	Site Sub-Division excluding Census Charge No.3 of District Karachi West	341,550	PS-114 Karachi West-III	Preliminary	341550
				S.D Site Charge 40704 Metroville	(53999)
				S.D Baldia (PS-116) Charge 40801 Abidabad	+63183
		Total	341,550	Total	350,733
PS-120 Karachi West-IX	a)The following Census Charges of Orangi Sub- Division:- i.Census Charge No.2 ii. Census Charge No.3 iii. Census Charge No.4 iv. Census Charge No.5 v. Census Charge No.6 vi. Census Charge No.10 vii. Census Charge No.11 and b)Census Charge No.3 of Site Sub- Division of District Karachi West	48656 33955 30405 81780 43298 31395 30158 63207	PS-120 Karachi West-IX	Existing Population	362,854
				S.D Orangi Charge No.40911, Orangi 11-A, Bukhari Colony	(30158)
				Charge No.40910, Ali Garh, Gulfamabad	(31395)
				S.D Site Charge No.40704, Metro Ville	+53999
		362,854		Total	355,300
NA-251 Karachi West-IV	a)Sub-Division Mominabad excluding the	724789	NA-251 Karachi West-IV	a)S.D Mominabad Charge No.1 to 9 (43801 to 43809):-	77388


	<p>following Census Charges:-</p> <p>i. Census Charge No.1</p> <p>ii. Census Charge No.15</p> <p>iii. Census Charge No.16 and</p> <p>b)The following Census Charges of Orangi Sub-Division:-</p> <p>i.Census Charge No.7 and</p> <p>ii. Census Charge No.8</p> <p>of District Karachi West</p>	<p>15921</p> <p>26014</p>		<p>i.Charge No.1 Zia Colony, Mominabad</p> <p>ii. Charge No.2, Alfateh Colony, Bismillah Colony;</p> <p>iii.Charge No.3, Haryana Colony;</p> <p>iv.Charge No.4, Noorani Mohallah, Faqir Colony;</p> <p>v.Charge No.5, Hanifabad, Alfarooq Colony, Rabbi Colony;</p> <p>vi.Charge No.6, Miraj ul Nabi Colony;</p> <p>vii.Charge No.8, Al Mustafa Colony, Muhammad Nagar, Faiz e Aam colony, Farid Colony;</p> <p>viii.Charge No.9, Madina Colony, Toheed Colony, Rahim Shah Colony;</p> <p>b)S.D Site Metrowille Charge No.40704:</p> <p>i.Charge No.40703 Pathan Colony;</p> <p>c)S.D Orangi</p> <p>i.Charge No.40901, Islamic Colony, New Mianwali Colony;</p> <p>ii. Charge No.40902, Mohammad Pur, Qasba Colony;</p> <p>iii.Charge No.40903, Qasba Colony, H Area, E Area, F area;</p> <p>iv. charge No.40904, Pir Abad, Muslim Abad;</p> <p>v.Charge No.40905, Frontier Colony, Siddique Akbar Colony;</p> <p>vi.Charge No.40906, Noorani Mohallah Frontier;</p> <p>vii.Charge No.40912, Baloch Goth, MPR Colony;</p>	<p>36818</p> <p>36840</p> <p>33687</p> <p>43083</p> <p>33023</p> <p>35255</p> <p>34666</p> <p>53999</p> <p>63207</p> <p>67289</p> <p>48656</p> <p>33955</p> <p>30405</p> <p>81780</p> <p>43298</p>
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iv. Census Charge No.27	20995		Charge No.40911, Orangi 11-A, Bukhari Colony	+30158
v. Census Charge No.28 and				
b) The following Census Charges of Orangi Sub-Division:-	67289			
i. Census Charge No.1	15921			
ii. Census Charge No.7	26014			
iii. Census Charge No.8	41621			
iv. Census Charge No.9 and	70117			
v. Census Charge No.12				
of District Karachi West.				
Total	359,069			

PRAYER

Keeping in view the position stated above, it is requested that proposed amendments in NA-249 (PS-116), NA-250 (PS-114, PS-120) AND NA-251 (PS-117 & PS-119) which have been made purely in the public interest according to the Act and Rules may kindly be accepted and delimitation of above national/provincial constituencies may very kindly be amended accordingly. Copies of census data, extracts of voter lists and maps are enclosed for perusal, please.


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