

1

March 14, 2018

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

22/3/18

Subject: **LEGAL OBJECTIONS AND PROPOSALS OVER THE PRELIMINARY LIST OF NATIONAL ASSEMBLY CONSTITUENCIES OF DISTRICT SHIKARPUR**

Dear Sir,

The undersigned applicant submits as under: -

1. With reference to Notification No.F.8(3)/2018-Elec-I dated 5th March, whereby Hon'ble Commission will hear and decide the objections / representations under sub-section (4) of Section 21 of the Elections Act, 2017 in connection with Preliminary list of National and Provincial Assembly Constituencies of Pakistan.

2. That the criteria for delimitation of National and Provincial Assembly Constituencies is laid down in sub-Section (1) of Section 20 of the Elections Act, 2017 is as under: -

"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."

3. In view of above discussion, I hereby submit my **LEGAL OBJECTIONS and PROPOSALS** to preliminary list of National Assembly constituencies namely **NA-198 Shikarpur-I and NA-199 Shikarpur-II**.

LEGAL OBJECTIONS

4. The Preliminary list of National Assembly constituencies of district Shikarpur have been made in violation of sub-section (1) of Section 20 of the Elections Act, 2017.

A. The difference of population is **55,111** between **NA-198** Shikarpur-I having population 6,43,296 being bigger and **NA-199**, Shikarpur-II having population 5,88,185 being smaller.

B. The NA-198, Shikarpur-I is consisting of two (2) Talukas, namely Shikarpur and Khanpur. Surprisingly, TC Jano of STC Shikarpur has been excluded in aforesaid constituency and included STC Jagan of Taluka Shikarpur. Whereas, in PS-7, Shikarpur-I Jagan STC of Taluka Shikarpur has been excluded, however, TC Jano STC Shikarpur is included.

C. The NA-199, Shikarpur-II is consisting of two (2) Talukas, namely Garhi Yasin and Lakhi. Interestingly, Tapo Jano of STC Shikarpur has been included in aforesaid constituency instead of STC Jagan of Shikarpur Taluka.

D. In the Preliminary list of constituencies, there has been gross violation of sub-section (1) of Section 20 of the Elections Act, 2017 by not maintaining the population criteria as far as practicable equal. The boundaries of administrative units have been divided / splitted conveniently without applying the principles as laid down in the Act, 2017 and guidelines.

E. While creating preliminary list of constituencies, the geographically compact area and public convenience has not been considered, due to which the general public will cause hardship.

WITHOUT PREJUDICE to above legal objections, Constituency-Wise Proposals are as under: -

Cont/2

PROPOSAL1) **PROPOSED NA-198 SHIKARPUR-I**

- (a) Entire Taluka Shikarpur excluding following areas: -
i) Jagan STC = 44,410

Total: 3,91,172 - 44,410 = 3,46,762

- (b) Entire Taluka Khanpur = 2,76,283

@ **Grand Total:** 3,46,762 + 2,76,283 = 6,23,045 i.e. 50.60%

2) **PROPOSED NA-199 SHIKARPUR-II**

- (a) Entire Taluka Garhi Yasin = 3,15,883
(b) Entire Taluka Lakhi = 2,48,143
(c) Following areas of Taluka Shikarpur is included: -
i) Jagan STC = 44,410


@ **Grand Total:** 3,15,883 + 2,48,143 + 44,410 = 6,08,436 i.e. 49.40%

Copies of the eight (8) proposed map of National Assembly Constituencies are attached herewith for ready reference.

I look forward to hearing from you and hope that your goodness will take some necessary action in this matter and do needful in this regard.

Thanking you.

Yours Sincerely,



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