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**BEFORE THE ELECTION COMMISSION  
OF PAKISTAN ISLAMABAD**

To, *The Secretary Election Commission*  
Representation No. of 2018

**Shakeel Ahmed**  
**S/O Ali Nawaz Raj,**  
**Muslim, Adult,**  
**R/O Village Old Darbelo,**  
**P.O old Darbelo, Tahsil Kandiario,**  
**District Naushahro Feroze,**  
**Sindh. SHAKEEL AHMAD.....PETITIONER**

**V E R S U S**

**The Delimitation Committee,**  
**Province of Sindh.....RESPONDANT**

**Representation under Rule-12 of the Election**  
**Rules 2017, against Preliminary Proposal of**  
**Delimitation to conjoin (T.C) Tapedar Circle**  
**“Mad Alim” with NA-212, which is**  
**geographically compact with NA-211 with**  
**prescribed ratio of population in District**  
**Naushahro Feroze, Province of Sindh.**

The Petitioner above named respectfully submits as under:

1. That the Petitioner is a law abiding and respectable citizen of Pakistan, residing at address

A/30/03/2019

mentioned above and is voter in constituency NA-211 .

2. That the Delimitation Committee (Respondent) has been constituted under rule 9 of Election rules of 2017, for the purpose to prepare draft proposal for Delimitation of Constituency of National Assembly and Provincial Assembly of respective Province.
3. That the respondent under rule 10 of Election rules of 2017 is responsible to collect all necessary data from relevant competent authorities for preparation of draft proposal for Delimitation of Constituencies according to principles of Delimitation as laid down in section 20 of Election Act 2017, procedure given in the Election rules and guideline provided by the Commission.
4. That according to provincial census result 2017, that total population of District Naushahro Feroze is 1,612,373 for which two National Assembly seats have been allocated viz NA-211 and NA-212 according to "quota per seat".
5. That the respondent proceeded with the plan of Delimiting for both constituencies in District Naushahro Feroze without considering the principles and norms as envisaged under section 20 of Election Act 2017.

8/30/03/2018

6. That the population of National Assembly Constituencies of District Naushahro Feroze as announced officially are as follows :-

(a) NA- 211 \_\_\_\_\_ 789,009-

(b) NA- 212 \_\_\_\_\_ 823,364-

7. That the respondent grossly erred to Conjoin the area of (Mad Alim) with NA- 212 which is geographically compact area with administrative part of Tahsil Bhiria but now added to Tahsil Naushahro Feroze without considering norms described in section 20 of Election Act 2017.

8. That (T.C) Tapedar Circle "Mad Alim" is existing part of Tahsil Bhiria with its administrative units for convenience and public communication, hence being aggrieved with said Delimitation by Respondent.

The Petitioner filed instant Representation on following grounds:-

**GROUND S**

1. That the process of Delimitation of Constituency for an Election is one of the important steps to organize and conduct Election with Convenience of voters.

2. That the preliminary proposal of Delimitation in District Naushahro Feroze for National

Assembly has been issued while ignoring the prescribe norms in section 20 of the Election Act 2017.

3. It is crystal clear from perusal of published map that, (T.C) Tapedar Circle "Mad Alim" is geographically compact with Tahsil Bhiria but it has been Conjoined with Tahsil Naushahro Feroze which is about 14 Kms away from Tapedar Circle "Mad Alim" this fact "Geographically Compact" is ignored by the respondent.

4. That (T.C) Tapedar Circle Mad Alim is existing part of Tahsil Bhiria with its administrative unit for communication facilities of public, same facts has also been ignored by the respondent.

5. That (T.C) Tapedar Circle Mad Alim being existing part of Tahsil Bhiria with all public convenience and with all cognate factors to ensure homogeneity to remain in NA-211 rather than to unjustifiably conjoin with NA-212.

6. The respondent ignored the fact of facilities of communication, public convenience physical features of area, existing boundaries of administrative units and geographically compact area with constituency NA-211 hence the petitioner filed the instant Representation with following proposals.

8/30/03/2018

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**PROPOSAL**

Population of NA-211 Which is at present is 789,009 and if (TC) Tapedar Circle "Mad Alim" population: 27,659 added to will be as  $789,009 + 27,569 = 816,668$ .

Population of NA-212 which is at present 823,364 and if Tapedar Circle "Mad Alim" population 27,659 is subtracted from  $823,364 - 27,659$  will be 795,705.

Both constituencies i.e. NA-211 population will be 816,668 and population NA- 212 will be 795,705 which will be according to the guidelines announced by the Election Commission of Pakistan and within ratio of "Quota of per seat"

That the said proposal of petitioner carries great public convenience and facilities of communication with existing administrative units of Tahsil Bhiria, hence the petitioner prays as under:-

**PRAYER**

That the Honorable Election Commission of Pakistan may kindly be pleased to set aside the preliminary Delimitation of said constituencies for National Assembly in District Naushahro Feroze

Handwritten signature and date: 30/03/2018

Province of Sindh and accept the proposal of Petitioner for final list of constitutes.

(Required documents are attached herewith)

Shakeel Ahmed

Petitioner

Dated: 30-03-2018

**VERIFICATION**

I, Shakeel Ahmed S/O Ali Nawaz Raj, Muslim, Adult, R/O Village Old Darbelo, P.O old Darbelo, Tahsil Kandiaro, District Naushahro Feroze, do hereby stayed on oath that whatever stated herein above is true and correct to the best of my knowledge and belief.

Verified at Islamabad on this 30 day of March 2018.

CELL NO = 0300-2339

Shakeel Ahmed

**DEPONENT**