



BEFORE THE SECRETARY ELECTION, ELECTION
COMMISSION OF PAKISTAN, @ISLAMABAD.

ELECTION APPEAL NO. /2018

Sarang Ali S/o Abdul Ghafoor,
By caste MQM, Muslim, adult,
R/o village Mariabad 76 Nasrat,
P.O. Daur Taluka Daur,
District Shaheed Benazirabad
CNIC No. 45402-5627075-5
Cell No. 0300-3239857Appellant.

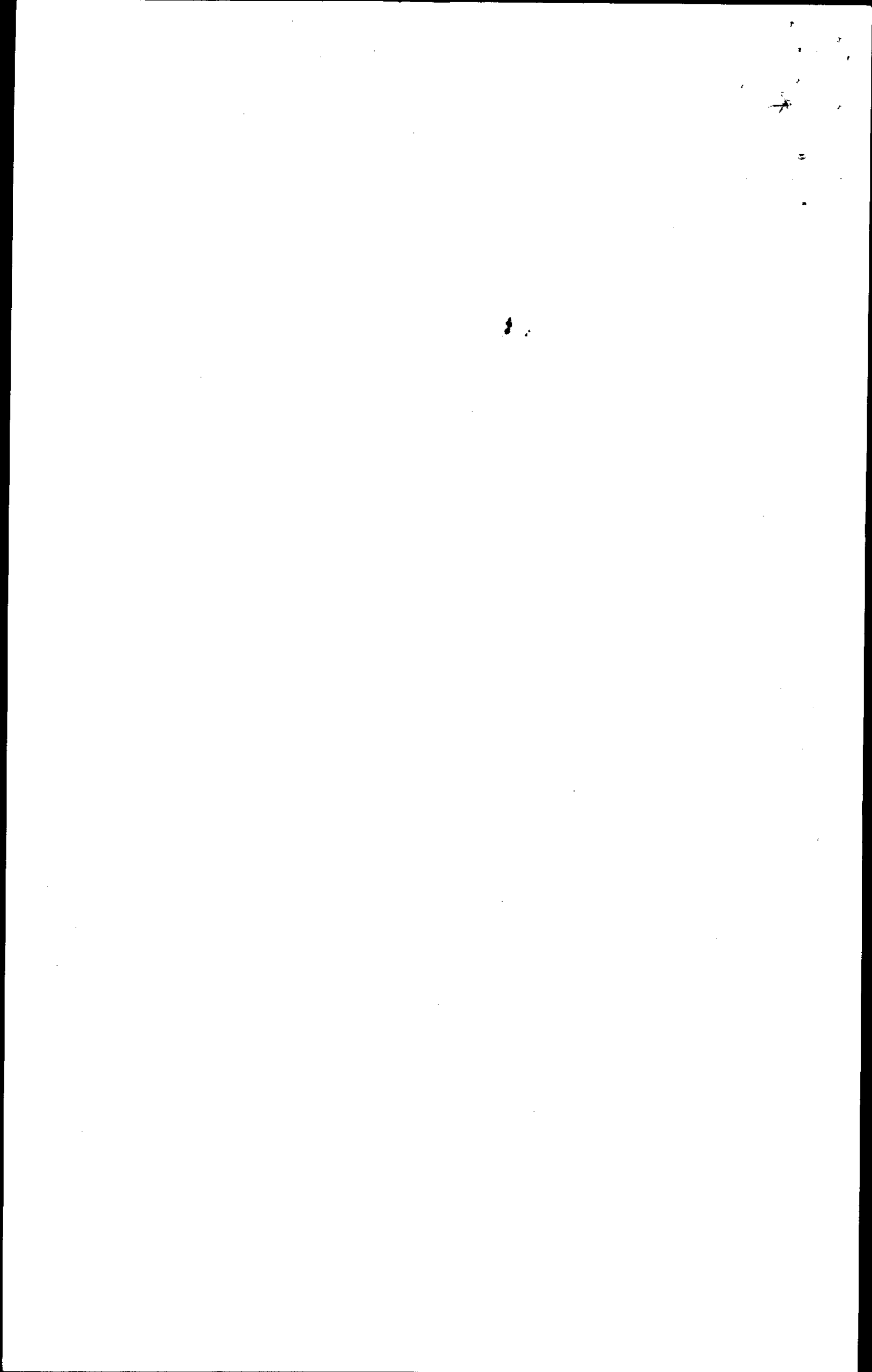
Versus

Competent Delimitation Authority,
Of NA-213-I & NA-214-II,
District Shaheed Benazirabad....Respondent

APPEAL UNDER SECTION 22 OF
ELECTION ACT, 2017

Being aggrieved and dissatisfied
with Delimitation of NA-213-I district
Shaheed Benazirabad wherefrom Daur TC
comprising of 073 Nasrat, 074 Nasrat and
076 Nasrat consisting of registered Total
voters 7762 registered voters (as per
Provisional Summary Result of 6th
Population of Housing Census, 2017) have
been excluded and included in NA-214-II
district Shaheed Benazirabad under

As per



proposed Notification dated 05.03.2018
issued by Election Commission of
Pakistan, which created so many
difficulties for local voters including
non-distribution of population in
geographical compact area, physical
feature, existing boundaries of
administrative units, facilities of
communication and public convenience and
other cognate factors to ensure
homogeneity in the creation of
Constituencies.

Hence, this appeal on
consideration of following grounds:

G R O U N D S.

1/- That, the Appellant is the
registered voter of Daur TC Nasrat; his
name is existed in the same area (Copy of
voter list is submitted herewith).

2/- That, as per notification dated
5.3.2018, National Assembly
constituencies i.e NA-213-I and NA-214-II

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district Shaheed Benazirabad have been delimited and constituted as under:

1. **NA-213-I Shaheed Benazirabad.**

Extent of the Constituency	Population
a. Taluka Nawabshah	413,913
b. Taluka Daur excluding the following area: i. Tapedar Circle Jamal Shah ii. Tapedar Circle Kandiari ii. Tapedar Circle liyari ii. Tapedar Circle Abul Hassan v. Tapedar Circle of Daur STC and vi. Tapedar Circle Marri Sabbar of Jam Sahib STC of district Shaheed Benazirabad	405,111
Total	8,19,024

2. **NA-214-II Shaheed Benazirabad.**

Extent of the Constituency	Population
a. Taluka Sakrand	372,875
b. Taluka Kazi Ahmed	348,702
c. Taluka Daur excluding the following area: i. Tapedar Circle Jamal Shah ii. Tapedar Circle Kandiari ii. Tapedar Circle liyari ii. Tapedar Circle Abul Hassan	13,245 12,245 12,102 12,137

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(7) *Yes*

v.Tapedar Circle of Daur STC and	7,762
vi.Tapedar Circle Marri Sabbar of Jam Sahib STC of district Shaheed Benazirabad	14,541
Total	793,823

2/- The voters of Daur TC would have easy approach to NA-213-II District Shaheed Benazirabad in comparison to NA-214-II district Shaheed Benazirabad (Certified copies of maps are submitted herewith for ready reference)

3/- That, the voters of Daur TC will suffer irreparable loss rather would be deprived to cast their votes in coming forth General Elections 2018 in case their votes will not be shifted from NA-214-II to NA-213-I district Shaheed Benazirabad.

4/- That, the shifting of the voters will not cause any difficulty in the said areas rather it will smooth distribution of population of Daur TC in geographical

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compact and existing boundaries of administrative units, facilities of communication and public convenience.

5/- That, the registered voters of Daur TC Nasrat would have easily approach to cast their votes in NA-213-I constituency rather to NA-214-II which will be far away and thereby financial burden on convenience would be borne by them.

6/- That, if Daur TC is shifted to NA-213-I from NA-214-II there will be no population increase in said constituency.

7/- That, as per boundary limit the registered voters would have easy access to NA-213-I in comparison to NA-214-I Shaheed Benazirabad.

8/- That shifting of voters of Daur TC 073,074, and 076 Nasrat i.e Total No.7,762, would facilitate inhabitants of said area for casting votes without fear

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in their constituency within their reach on easy convenience.

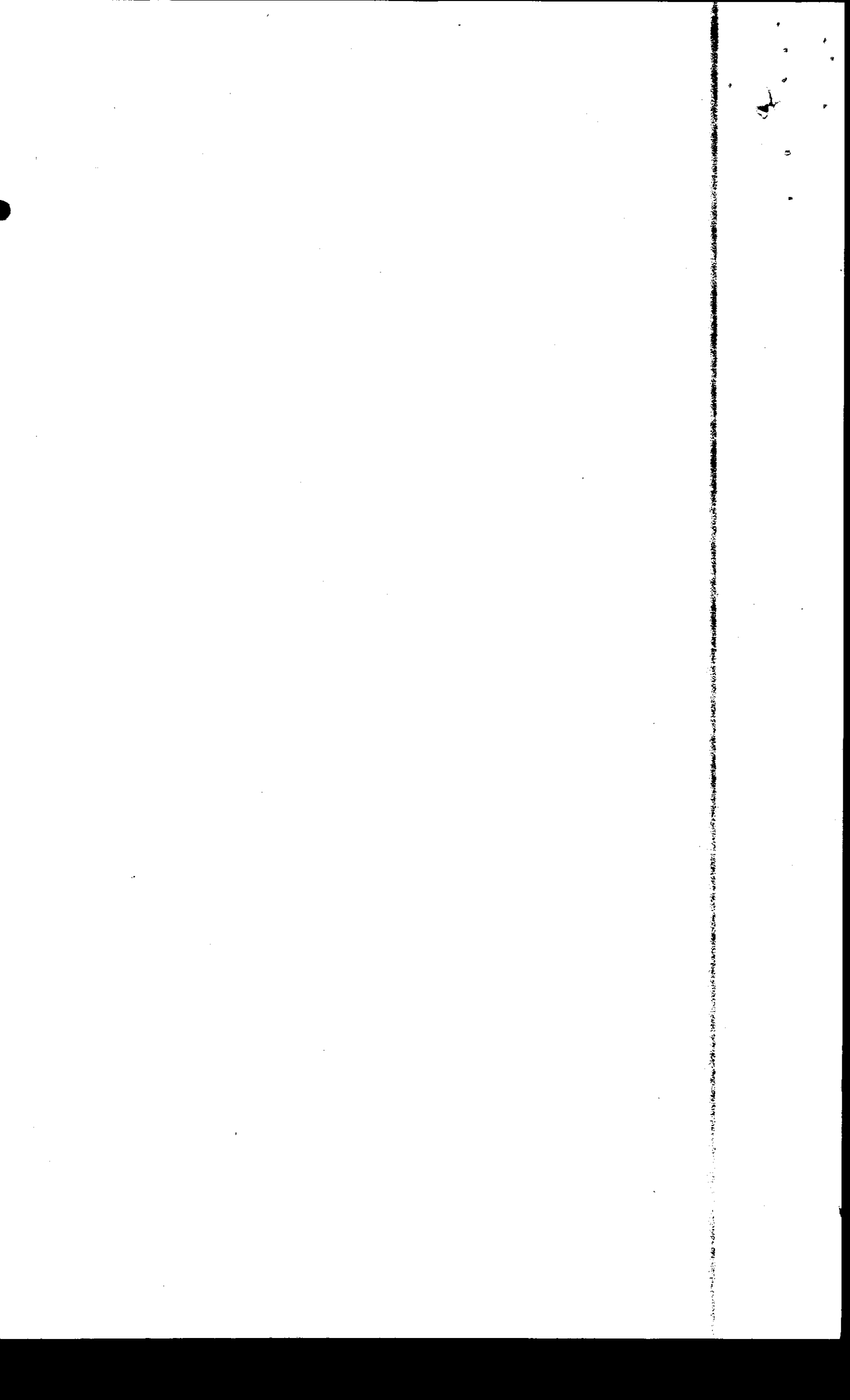
9/- That, the shifting of registered voters of Daur TC 073, 074 and 076 Nasrat would be in regard to fair distribution of population, geographical compact of the area, physical features, and existing boundaries of administrative units of National Assembly Constituency in all respect.

10/- That, the registered voters of Daur TC would have an opportunity to cast their valueable votes within their reach of conveyance rather to cast at constituency of NA-214-II.

P R A Y E R

Therefore, in the light of above facts and figures it is humbly prayed that the request of shifting of registered voters of Daur TC from NA-214-II to NA-213-I of district Shaheed Benazirabad may kindly be sympathetically

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considered and order for deletion of said voters from NA-214-II district Shaheed Benazirabad and inclusion in NA-213-I district Shaheed Benazirabad for fair distribution of population, geographical compact of the area, physical features, and existing boundaries of administrative units in the larger interest of voters.

The prayer is made in the interest of justice and general public at large.

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A P P E L L A N T

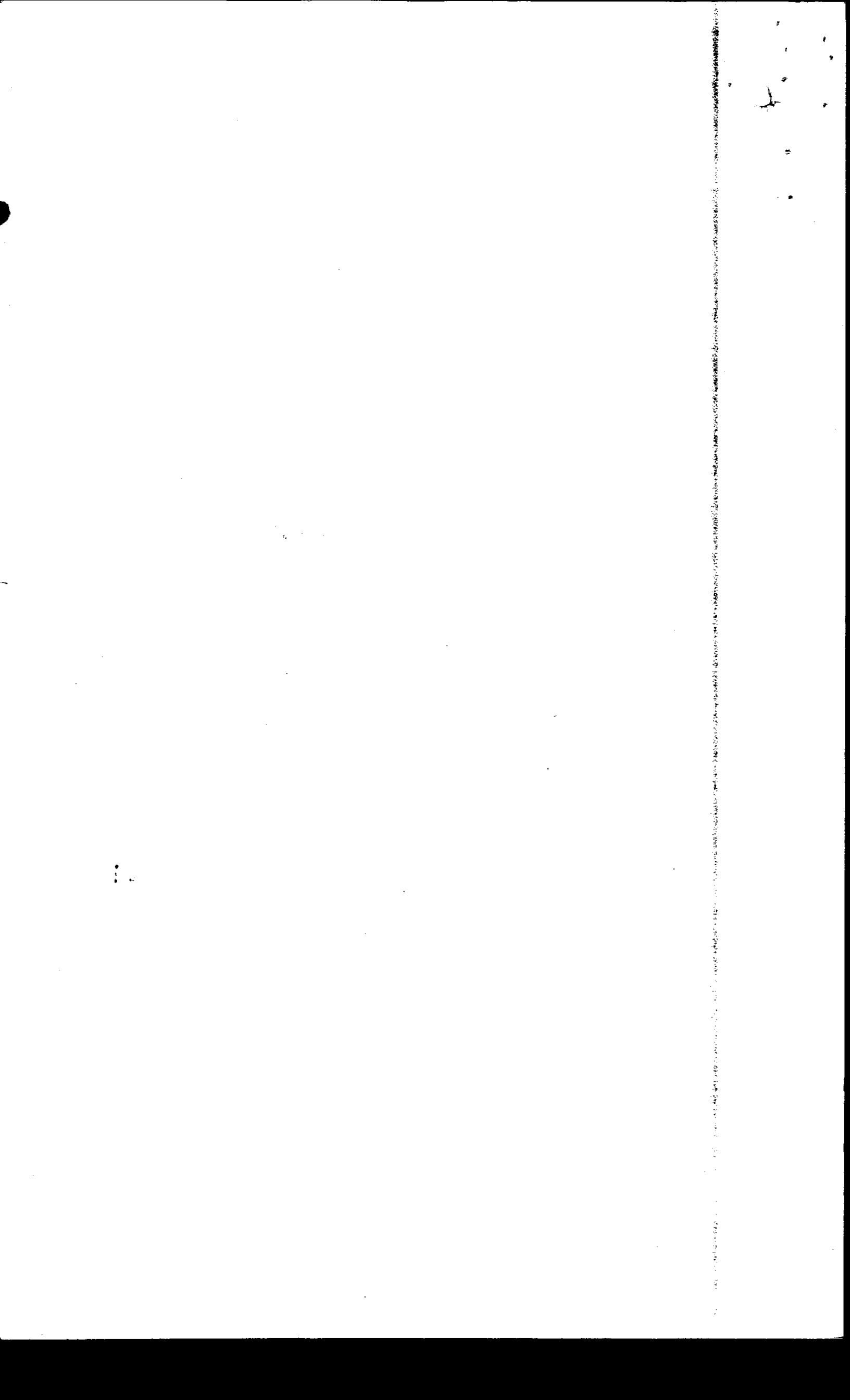
**Sarang Ali
S/o**

**Abdul Ghafoor Mari
R/o Village Mariabad
76 Nasrat P.O.Daur
Taluka Daur District
Shaheed Benazirabad
CNIC No. 45402-5627075-5
Cell No.0300-3239857**

**ISLAMABD.
Dt.02.04.2018**

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ADVOCATE FOR APPELLANT.



BEFORE THE SECRETARY ELECTION, ELECTION
COMMISSION OF PAKISTAN, @ISLAMABAD.

ELECTION APPEAL NO. /2018

Sarang AliAppellant.

Vs

Competent Delimitation Authority
NA-213-I & NA-214-II
District Shaheed Benazirabad. ...Respondent

M E M O R A N D U M

I, Sarang Ali s/o Abdul Ghafoor,
Muslim, adult, by caste MQRI, resident of
Village Mariabad 76 Nasrat P.O. Daur
Taluka Daur District Shaheed Benazirabad,
do hereby state on solemn affirmation as
under:

1/- That, the contents of appeal for
shifting of Daur TC from NA-214-II
district Shaheed Benazirabad to NA-213-I
district Shaheed Benazirabad is fit and
proper in accordance with fair
distribution of population, geographical
compact of the area, physical features,
and existing boundaries of administrative

units.



2/- That, the Annexures which are annexed along with Memo of appeal /Memorandum are correct, true to the best of my knowledge and belief.

Whatever stated above is all true and correct to the best of my knowledge and belief.

ISLAMABAD

Dt.02.04.2018


D E P O N E N T

The deponent above named is known to me and is identified by me to the Commissioner for taking affidavit.


A D V O C A T E

On S.A. before me by the deponent above named on this -----day of ----- 2018. The deponent is identified to me by Mr.Hameedullah Dahri, Advocate, who is known to me. The contents of this affidavit were first truly and audibly read over and explained to the deponent in Sindhi language and he appears to have understood the same and put his hands unto on this on above mentioned date in my presence.


A. Sattar Sheikh
Advocate & Oath Commissioner
Appointed U/S 39 (b) CPC

Commissioner for taking affidavit.

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Sarang AliAppellant.

Vs

Competent Delimitation Authority
NA-213-I & NA-214-II
District Shaheed Benazirabad. ...Respondent

A F F I D A V I T

I, Sarang Ali s/o Abdul Ghafoor,
Muslim, adult, by caste Marj, resident of
Village Mariabad 76 Nasrat P.O. Daur
Taluka Daur District Shaheed Benazirabad,
do hereby state on solemn affirmation as
under:

1/- That, I am Appellant in above
matter and am well conversant with the
facts of the same.

2/- That, accompanying appeal against
delimitation of Daur TC has been drafted,
typed under my instructions and on the
advice of my counsel.

Sarang Ali

3/- That, for the sake of brevity, the contents of accompanying objections to delimitation be considered as part and parcel of this affidavit.

4/- That, I am advised to say that shifting of Daur TC from NA-214-II district Shaheed Benazirabad to NA-213-I district Shaheed Benazirabad is fit and proper in accordance with fair distribution of population, geographical compact of the area, physical features, and existing boundaries of administrative units.

Whatever stated above is all true and correct to the best of my knowledge and belief.

ISLAMABAD

Dt.02.04.2018

DEPONENT

The deponent above named is known to me and is identified by me to the Commissioner for taking affidavit.


ADVOCATE

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As witness


A. Sattar Sheikh
Advocate & Oath Commissioner
Appointed U/S 39 (b) CPC

Commissioner for taking affidavit.

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