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**BEFORE THE ELECTION COMMISSION OF PAKISTAN**

**REPRESENTATION IN RESPECT OF THE DELIMITATION OF THE  
CONSTITUENCY NA-221 PROPOSED IN THE PRELIMINARY  
REPORT**

Respectfully Sheweth:

1. That the objector is a registered voter of Constituency No. NA-230 (old) who is aggrieved by the delimitation of this constituency proposed in the preliminary report. In order to substantiate this fact his copy of ID Card is attached with this Memorandum.
2. That it is the Constitutional obligation of the Election Commission of Pakistan to ensure free and fair polls in the country. For achieving this objective fair and transparent delimitation is indispensable. Election Commission of Pakistan is duty bound to provide all voters of the constituency such an environment or process where they can exercise their right to vote in a free and convenient manner.
3. That the preliminary report relating to delimitation suggests that demarcation of the boundaries of electoral constituency No. NA-221 is faulty and may disenfranchise a great number of voters on the following grounds:
  - a. Voters of this constituency had been exercising their right of votes without any difficulty in the elections which were held in the year of 2002, 2008 and 2013 because facilities of communication were easily available, therefore, there is no legal justification for disturbing the demarcation of boundaries of this constituency for the upcoming elections as the population is approximately the same for newly created and previous

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- b. Previously this constituency was numbered as NA-230 (old) which is NA-221 now. The population of NA-230 (old) was 838949 whereas the population of NA-221 is 858661. If the demarcation of boundaries of constituency number NA-230 (old) is kept intact it will not cause any hindrance in conducting the elections in an honest, just, fair and free from corrupt practices manner.
- c. The District Election Commissioner Tharparker who conducted the physical survey of all the constituencies in Tharparker District proposed and recommended that the demarcation of boundaries for electoral constituencies which were made previously and elections in the years of 2002, 2008 and 2013 were held according to that demarcation should remain the same for the upcoming elections as well. Therefore, changing of the boundaries of electoral constituencies of this district may cause unnecessary problems to the voters who are familiar and know where the polling stations are, and to which constituency they belong.
- d. The vital component of NA-230 (old) STC Kantio has been detached and included TC Rajoro which will be problematic for the voters in exercising their right of votes, therefore, the previous demarcation of boundaries of electoral constituencies No. 230 (old) be retained. It is also submitted that STC Kantio and TC Hanjital of Taluka Chachro be included in NA-221 and other areas which were not the part of this constituency prior issuance of proposed delimitation be excluded.

Under the circumstances, it is respectfully prayed that the proposed demarcation of electoral constituency No. NA-221 is illegal, unjust and without lawful authority be

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set aside and status of old constituency as it existed prior to issuance of proposed report may kindly be restored in the interest of justice, equity and fair play.

Applicant:



(Dilawar Khan)  
S/o Muhammad Hussain  
Caste Nohri  
r/o Vill Mithrio Malkani, Tehsil  
Chachro, District Tharparkar,  
Sindh  
CNIC No. 44301-261331-3

Through:

(Idrees Ashraf)  
Advocate High Court