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Before the Worthy Secretary to the Honourable Election Commission of Pakistan



Representation No. of 2018

Representation under section 21 of the Elections Act, 2017, read with rule 12 of the Election Rules, 2017 in respect of the delimitation of constituencies of National Assembly of District Badin

Respectfully Submitted:-

The undersigned applicant submits as under: -

1. With reference to Notification No.F.8(3)/2018-Elec-I dated 5th March, whereby this 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 a combined reading of section 20 of the Elections Act, 2017 and rule 10 of the Election Rules, 2017 reveals that the following principles and procedures are to be kept in mind at the time of making the delimitation of the constituencies:
 - (i) Distribution of population in geographically compact areas
 - (ii) Physical features
 - (iii) Existing boundaries of administrative units
 - (iv) Facilities of communication
 - (v) Public convenience
 - (vi) Other cognate factors to ensure homogeneity
 - (vii) The delimitation of constituencies of an Assembly shall start from the Northern end of the district; and

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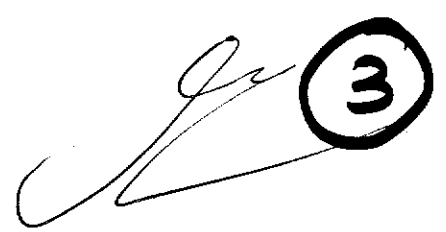
- (viii) Then it will proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable
- (ix) The variation in population between two or more constituencies shall not ordinarily exceed ten percent
3. In line with the guidelines provided by law, the Petitioner submits his proposal for National Assembly constituencies namely NA-229 (Badin-I) and NA-230 (Badin-II) in the manner as detailed in the following paragraphs.
4. The only difference proposed is the exclusion of one Tapedar Circle (Patwar Circle), namely Khadi Adat of Pangrio STC (QH) of Taluka Tando Bago from NA-229 Badin-I and its inclusion in NA-230 Badin-II. This proposal is made in the interest of maintaining minimum population disparity between the two constituencies of District Badin.
5. As per the ECPs proposal, the population of both the constituencies are:
- | | |
|-----------------|---------|
| NA-229 Badin-I | 922,910 |
| NA-230 Badin-II | 881,606 |
- Therefore, a difference of **41,304**
6. In case of acceptance of this representation, the population of the constituencies will be
- | | |
|-----------------|---------|
| NA-229 Badin-I | 904,100 |
| NA-230 Badin-II | 900,416 |
- Therefore, a difference of **3,684**
7. After acceptance of this representation, the two National Assembly Constituencies of District Badin will be as under

PROPOSED NA-229 BADIN-I

a)	Matli Taluka;	443,412
b)	Talhar Taluka and	172,254
c)	Tando Bago Taluka excluding the following areas: -	288,434
	i. Town Committee Khoski,	
	ii. Tapedar Circle Kak of Tando Bago STC	
	iii. Tapedar Circle Mir Himmat of Tando Bago STC	
	iv. Tapedar Circle Hingorjani of Pangrio STC	
	v. Tapedar Circle Khoski of Pangrio STC	
	vi. Tapedar Circle Akore of Pangrio STC	
	vii. Tapedar Circle Khadi Adat of Pangrio STC	

of District Badin

Total Population: 9,04,100



PROPOSED NA-230 BADIN –II

a)	Golarchi (Shaheed Fazal Rahu) Taluka;	334,697
b)	Badin Taluka and	455,295
c)	The following areas of Tando Bago Taluka: -	
i.	Town Committee Khoski,	27,382
ii.	Tapedar Circle Kak of Tando Bago STC	20,268
iii.	Tapedar Circle Mir Himmat of Tando Bago STC	11,940
iv.	Tapedar Circle Hingorjani of Pangrio STC	5,971
v.	Tapedar Circle Khoski of Pangrio STC	16,638
vi.	Tapedar Circle Akore of Pangrio STC	9,415
vii.	Tapedar Circle Khadi Adat of Pangrio STC of District Badin	18,810

Total Population: 9,00,416

8. That being aggrieved by and dissatisfied with the part of list of constituencies, published in the Preliminary Delimitation Report, 2018, particularly specifying the areas proposed to be included in / excluded from proposed National Assembly constituencies NA – 229 and NA – 230 of District Badin and in the best interest of the population of the district as a whole, the Petitioner craves the kind indulgence of this Honourable Commission for making amendments, alterations or modifications as suggested / proposed by the Petitioner in paragraphs 4 to 7 above, *inter alia*, on the following

Grounds

- (a) That while preparing the Preliminary Delimitation Report, 2018 comprising of proposals for fresh delimitation of constituencies for National Assembly in Badin District especially proposed NA – 229 and NA – 230, it is respectfully submitted, the relevant Delimitation Committee failed to adhere to the above stated mandatory principles and procedures in letter and spirit therefore there is a need to revisit the said delimitation proposal by this Honourable Commission.
- (b) By excluding only one Tapedar Circle namely Khadi Adat of Pangrio STC (QH) of Taluka Tando Bago from NA – 229 and including the same in NA – 230, both the National Assembly constituencies will maintain the minimum disparity of population i.e. 3,684 only. Therefore ideal constituencies would be created.

In view of the foregoing, it is most respectfully prayed that the instant representation may kindly be accepted and the amendments, alterations or modifications proposed / suggested by the Petitioner in paragraph 4 to 7 of this representation may graciously



be incorporated in the final report and list of constituencies showing the areas included in each constituency.

Any other relief which this Honourable Commission may deem just and appropriate may also be granted to the Petitioner in the interest of law, justice and equity.



Petitioner

Hasnain Ali Mirza son of Dr. Zulfiqar Ali Mirza
R/o Mirza Farms, Jakheji I, Golarchi
Tehsil Shaeed Fazal Rahu, District Badin
Phone: 0321 8242558

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Before the Worthy Secretary to the Honourable Election Commission of Pakistan

Representation No. _____ of 2018

(Representation under section 21 of the Elections Act, 2017, read with rule 12 of the Election Rules, 2017 in respect of the delimitation of constituencies of National Assembly of District Badin)

Affidavit

I, Hasnain Ali Mirza son of Dr. Zulfiqar Ali Mirza, R/o Mirza Farms, Jakheji I, Golarchi, Tehsil Shaeed Fazal Rahu, District Badin, do hereby solemnly affirm and declare that the contents of the accompanying Representation are true and correct to the best of my knowledge and belief, and nothing has been concealed or withheld therein.

[Handwritten signature]

DEPONENT

VERIFICATION

Verified on oath at Islamabad on this _____ day of _____ 2018 that the contents of the application are true and correct to the best of my knowledge, information and belief and nothing has been concealed therein.

[Handwritten signature]

DEPONENT

Above mentioned affidavit identified before me on _____/_____/2018
Who is personally known and identified
Mr. _____
I have read the contents of the affidavit and have been
satisfied that the contents of the affidavit are true and correct and
nothing has been concealed therein and the deponent who
was present before me has been identified the same
St. No. _____

[Handwritten signature]
Abdul Qadir Kayani
Additional Judge High Courts
Oath Commissioner
Islamabad