

To,  
The Honourable Secretary,  
Election Commission of Pakistan,  
Islamabad.

DATED 26.03.2018

Subject: **MEMORANDUM OF REPRESENTATION AGAINST  
THE DELIMITATION OF THE CONSTITUENCIES OF  
DISTRICT (SOUTH) KARACHI**

Respected Sir,

We the applicants / voters of our constituencies, most humbly and respectfully bring following objections / memorandum of representations against the delimitation made by the Authorities and also submit the proposed maps / delimitation of the entire District for your kind consideration:

**Applicants / Voters**

1. Abid Khan  
S/o Maqbool-ur-Rehman  
CNIC No.42000-0572892-5  
PS-111/110
2. Waqar Ahmed Awan  
S/o Gulab Khan Awan  
CNIC No.42301-08333504-1  
PS-111/110

**OBJECTIONS ON THE CONSTITUENCIES OF P.S 110 AND P.S  
111 OF DISTRICT SOUTH KARACHI.**

1. P.S 110 District South Karachi consisting of a total population  
374,132.
2. P.S 111 District South Karachi consisting of a total population  
358,220.

3. Charge No. 4 of Sub-Division Civil Lines consisting of 58749 population of District South has been illegally broken included in Sub-Division Clifton Cantonment of P.S 111.
4. Entire Karachi Cantonment consisting of 68877 population is illegally merged into P.S 110, though cantonments deals with all the affairs of the basic facilities and development scheme of the area itself.
5. That Geographic and compactness of both the Constituencies have affected. The authorities have not taken into consideration the following section of the law, before delimiting the constituency of P.S 110 and P.S 111, such as;

*Section 20 of the Election Act 2017, provides that (1) All constituency for general seats shall, as far as practicable, be delimited having regard to the distribution of the 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.*

*(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.*

*(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.*

*(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.*

6. That Ward No. 4 of Union Committee No.30 (consisting of 4 wards) and Ward No. 4 of Union Committee No.31 (consisting

of 4 wards) have been illegally broken and detached from both the U.Cs

7. That Infrastructure of the Charge No.4 shall badly affect in case of the delimitation of the constituency. Civil facilities like Water, Sewerage, Sanitation and Development which are the responsibility of KMC but by this delimitation the said facilities shall be frustrated and the people would face great deal of difficulties. The convenience of the people and their basic facilities have not been taken care of by the ECP / Delimitation Authorities.
8. The areas of Karachi Cantonment and Clifton Cantonment would not change by the exclusion of the Charge No.4, rather the area of both the cantonment shall remain in compactness. The applicants proposed the following amendment delimitation of the constituencies.

#### PS-110 Delimitation by ECP form 5

CHARGE NO.	CIRCLE	SUB-DIVISION	POPULATION
2	ALL	Aram Bagh	34523
3	ALL	Aram Bagh	41301
4	ALL	Aram Bagh	27757
1	ALL	Saddar	36366
1	ALL	KARACHI CANT.	32870
2	ALL	KARACHI CANT.	36007
1	ALL	Civil Lines	32140
2	ALL	Civil Lines	62288
3	ALL	Civil Lines	25375
5	ALL	Civil Lines	45505
<b>TOTAL POPULATION</b>			<b>374132</b>

District South PS-110 Proposed by  
applicants

CHARGE NO.	SUB-DIVISION	POPULATION	CHARGE DISCRPTION
2	Aram Bagh	34523	UC-25 KHARADAR
3	Aram Bagh	41301	UC-26
4	Aram Bagh	27757	UC 27
1	Saddar	36366	UC-27 UC-28
1	Civil Lines	32140	UC-29
2	Civil Lines	62288	UC-29 UC-30
3	Civil Lines	25375	UC-30
4	Civil Lines	58749	UC-30 UC-31
5	Civil Lines	45505	UC-31
<b>TOTAL</b>		<b>364004</b>	

**PS-111 Delimitation by ECP Form 5**

CHARGE NO.	CIRCLE	SUB-DIVISION	POPULATION	CHARGE DISCRPT
1 to 5	ALL	CLIFTON CANT.	299471	
4	ALL	Civil Lines	58749	UC-30 UC
<b>TOTAL POPULATION</b>			<b>358220</b>	

District South PS-110 Proposed by applicants

District South PS-111 Proposal			
CHARGE NO.	SUB-DIVISION	POPULATION	
1 to 2	KARACHI CONTONMENT BOARD	68877	
1 to 5	CLIFTON CONTONMENT BOARD	299471	
<b>TOTAL</b>		<b>368348</b>	

9. The population of Charge No. 4 consisting of sub-division Civil lines 58,749 U.C 30 & U.C 31 Ward No. 4 of both the U.Cs may be included in the P.S 110 and excluded from P.S 111. The portion of the Karachi Cantonment having population of 68,877 may be included in the P.S 111 and excluded from P.S 110.

10. That after excluding the part of Karachi Cantonment from P.S 111 and including Charge No. 4 into P.S 110 no any effect would made on both the constituencies of P.S 110 and P.S 111.
11. That while conducting census the population of the both the cantonment areas were separately counted while the civil part was separately counted.
12. That Even on the basis of the above proposed amendments only minor changes are proposed which would not only save irrational distribution but so also shall make the constituencies compact without changing their geographical status.
13. That this will meet with the ends of justice if your honour may be pleased to consider the representation / objections and allows the proposals made by the applicants.



Authorized Person /  
Attorney  
Of the applicants