

IN THE ELECTION COMMISSION OF PAKISTAN AT ISLAMABAD

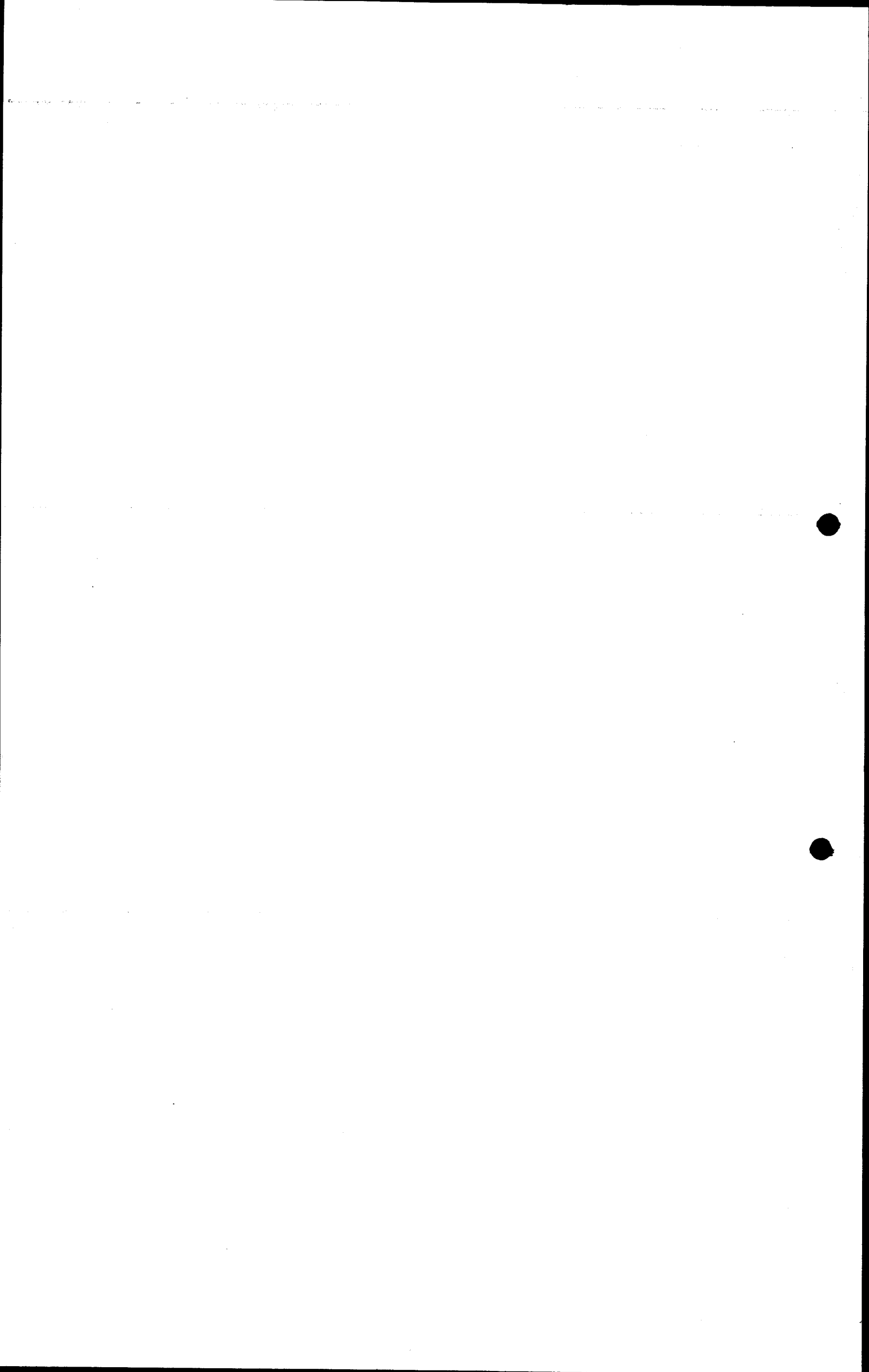
REPRESENTATION NO. ___ OF 2018

In the matter of Delimitation of Constituencies:

1. **MUHAMMAD JAVED**
S/o Muhammad Ishaq
Muslim, Adult, Resident of
Taj Masjid Road, Agra Taj Colony
Street No: G-7, Lyari,
Karachi.
2. **MUHAMMAD SHAFIQUE**
S/o Muhammad Rafique
Muslim, Adult, Resident of
Taj Masjid Road, Agra Taj Colony
Street No: G-7, Lyari,
Karachi.
3. **MUHAMMAD YASIR MUSHTAQ**
S/o Mushtaq Ahmed
Muslim, Adult, Resident of
Taj Masjid Road, Agra Taj Colony
Street No: G-8, Lyari,
Karachi.
4. **RIAZ AHMED**
S/o Muhammad Ishaq
Muslim, Adult, Resident of
Taj Masjid Road, Agra Taj Colony
House No 219, Lyari,
Karachi.
5. **ADNAN SHAH**
S/o Ameer Shah
Muslim, Adult, Resident of
Hanfia Masjid Road, Agra Taj Colony
Street No: E-5, Lyari,
Karachi.
6. **AMEER SHAH**
S/o Sawal Shah
Muslim, Adult, Resident of
Hanfia Masjid Road, Agra Taj Colony
Street No: E-5, Lyari,
Karachi.
7. **MUHAMMAD SHAHBAZ**
S/o Muhammad Yaqoob
Muslim, Adult, Resident of
Taj Masjid Road, Agra Taj Colony
Street No: G-6, Lyari,
Karachi.
8. **BILAL BUTT**

102/07/2018
1-7

1



S/o Muhammad Shabbir Butt
Muslim, Adult, Resident of
House No.7/76,
Taj Masjid Road, Agra Taj Colony
Street No: G-7, Lyari,
Karachi.

27/4/2018 3

9. RASHID IQBAL
S/o Muhammad Siddiqui
Muslim, Adult, Resident of
House No. 315, Agra Taj Colony
Street No: G-8, Lyari,
Karachi.

..... PETITIONERS

REPRESENTATION UNDER SECTION 21 OF THE ELECTIONS ACT, 2017 READ WITH RULE 12 OF THE ELECTION RULES 2017 AGAINST THE DELIMITATION OF PROVINCIAL ASSEMBLY CONSTITUENCY PS-107, KARACHI, SINDH

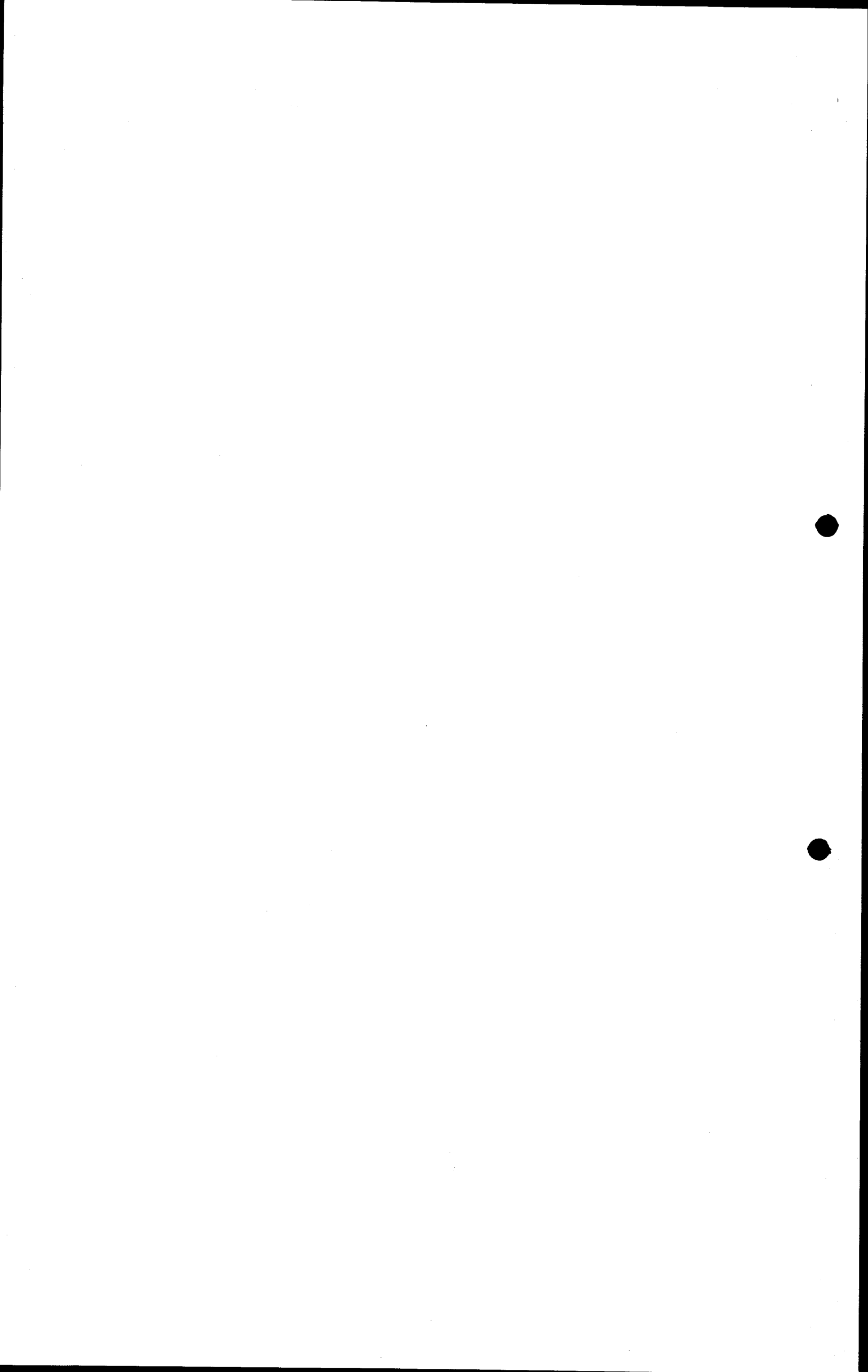
We, the voters of PS-107, most humbly and respectfully bring the objections / memorandum of representation against the delimitation made by the ECP and also submit the proposed maps / delimitation of the entire district for your kind consideration. The instant representation is filed by duly authorised attorney of the Petitioners

(Copy of Power of Attorney is annexed herewith and marked as Annexure "A")

FACTS & GROUNDS:

1. That the PS-107 is a part of District South, Karachi, which as per the notified Census results, has a population of 1,791,751 people.
2. That it is pertinent to mention here that as per the proposed delimitation published by the ECP, Charge No. 1 of Lyari Sub- Division has been illegally broken down and merged with PS- 108. Needless to state that the census Circle No. 1, 2, 5, 6 & 7 have been illegally merged with PS-108 which is a blatant violation of the Election Act and Rules.
3. That it is imperative to highlight here that as per the proposed delimitation published by the ECP Charge No. 9 of Lyari sub-division has been illegally broken down and the census Circles of Charge No. 9 are distributed between PS- 107 and PS 108 which defy all logic and *prima-facie* appears to be an unnecessary act to somehow benefit someone and devoid of any logic.
4. That in addition to the abovementioned anomalies, Charge No. 1 of Sub-division Aram Bagh is illegally included in the PS- 107.
5. That the total population of PS- 107 is 339,319 people as per the formula adopted by ECP under the applicable laws:

Constituency	Area	Population
PS-107	i) Census Charge No. 2	52,033



JA 02/01/2018

5

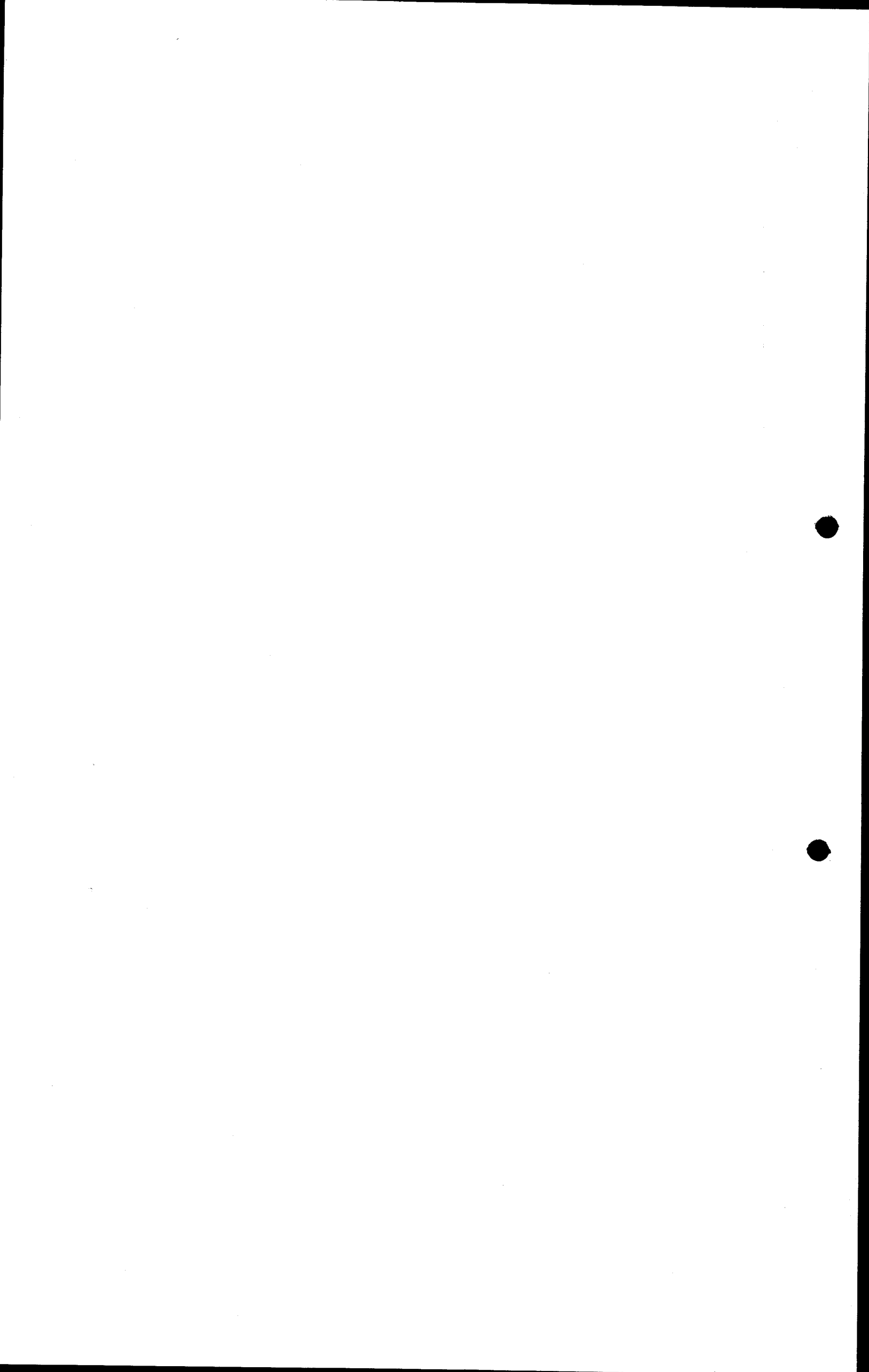
Karachi South-I	ii)	Census Charge No. 3	29,618
	iii)	Census Charge No. 4	50,176
	iv)	Census Charge No. 5	40,439
	v)	Census Charge No. 6	30,223
	vi)	Census Charge No. 7	49,241
	vii)	Census Charge No. 8	36,574
	viii)	Census Circle no. 3 & 4 Charge No. 1	14,689 11,533
	ix)	Census Circle no. 5 of Charge No. 9	24,793
	x)	Census Charge No. 1 of Aram Bagh Sub-Division	<u>339,319</u>

(Copy of Delimitation Map Proposed by ECP is enclosed as Annexure "B")

6. That a perusal of the above clearly shows that two census Charges in PS 107 have been broken up in a manner which is devoid of any contiguous harmony and also in deviation of the principles of delimitation.
7. That it is crucial to highlight here that the Sub-Division Arambagh is a completely different administrative unit and merging the instant Sub-Division in PS 107 is blatant defiance of the section 20 of the Elections Act of 2017 as well as numerous judgements pronounced by the Hon'ble Courts.
8. That the geographical compactness of PS 107 & 108 has miserably affected due to the proposed delimitation of the ECP. The ECP have failed to take into account Section 20 of the Elections Act, 2017.
9. That keeping in view the principle of public convenience as well as geographical, historical and physical contiguity, the Charge No. 1 should become the part of PS-107 and Charge No. 9 should be added to PS 108 (in order to complete the population numbers for PS-107)

Constituency	Area	Population
PS-107	i) Census Charge No. 1	60,171
Karachi South-I	ii) Census Charge No. 2	52,033
	iii) Census Charge No. 3	29,618
	iv) Census Charge No. 4	50,176
	v) Census Charge No. 5	40,439
	vi) Census Charge No. 6	30,223
	vii) Census Charge No. 7	49,241
	viii) Census Charge No. 8	36,574
		<u>348,475</u>

(Copy of Delimitation Map Proposed by Petitioner is enclosed as Annexure "C")



11/02/04/2018

7

10. That the above arrangement comprises of areas, which are geographically contiguous as well as continues with the best possible communication network amongst them. Furthermore, it is exactly the same to the previous delimitation done in the year 2002 thus facilitating the voters & more importantly electoral process in the respective constituencies.

11. That at this juncture it is imperative to point-out here that above arrangement proposed by the Petitioners follows the criteria enunciated in the Elections Act and Rules of 2017. Needless to state that the proposed arrangement will not only save irrational distribution also make the constituency more compact without changing geographical status

PRAYER:

It is therefore most respectfully submitted that the Hon'ble Election Commission of Pakistan may be pleased to set aside the preliminary delimitation of constituencies of Provincial Assembly of Sindh in respect of PS- 107 and in the interest of justice accept the proposal submitted by the Petitioner (Annexure C) as final list of constituencies in respect of PS 107.



DATED: 02.04.2018

AUTHORISED PERSON/

ATTORNEY OF THE PETITIONERS



ADVOCATE FOR THE PETITIONERS

Annexures:

Power of Attorney (Annexure A)

Map of Proposed Constituencies by ECP (Annexure B)

Map Proposed in the Representation (Annexure C)

Copy of CNIC (Annexure D)

Copy of Voter Extract (Annexure E)

Vakalatnama (Annexure F)

