

To,

Dated 02-04-2018

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

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. Syed Akbar
S/o Syed Ismail Mian
CNIC NO.42301-6639817-3
PS-108
2. Syed Abdul Rasheed
S/o Syed Muhammad Shoaib
CNIC NO. 42301-0814754-7
PS-108
3. Fazulurrahman Nayazi
s/o Aarsal Khan
CNIC NO. 42301-4212625-9
PS-107
4. Muhammad Faisal
s/o Abdul Gufar
CNIC NO. 42301-0555113-1
PS-109
5. Faisal
S/o. Muhammad Rafiq
CNIC NO. 42301-7322657-5
PS-110
6. Saad Liaquat
Liaquat Abdullah
CNIC NO. 42301-2402778-1
PS-110



MH/10/1/18

OBJECTIONS ON THE CONSTITUENCIES OF P.S 110 /109/108 AND PS -107 OF DISTRICT SOUTH KARACHI.

1. P.S 110 District South Karachi consisting of a total population 374,132.
2. P.S 109 District South Karachi consisting of a total population 365,323.
3. P.S 108 District South Karachi consisting of a total population 348,290.
4. P.S 107 District South Karachi consisting of a total population 339,319
7. That the above perusal of delimitation proposed by ECP reveals that Geographic and compactness of above said four constituencies have law adversely affected. The authorities have not taken into consideration the following mandate in its true latter and spirit , before delimiting the constituency of P.S 110/PS 109/PS108 and P.S 107 the legal proposit enacted vide a 20 of act 2017 repurposed herein before for year kind perusal;-

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 futures, 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 delimitation 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.



M. Jinnah
5/4/18

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
TOTAL POPULATION			374132

District South PS-110 Proposed by Applicant(s)

Charge No	CIRCLE	SUB-DIVISION	POPULATION
3	ALL	Aram Bagh	41301
4	ALL	Aram Bagh	27757
1	ALL	Saddar	36366
1	ALL	KCB	32870
2	ALL	KCB	36007
1	ALL	Civil Lines	32140
2	ALL	Civil Lines	62288
3	ALL	Civil Lines	25375
5	ALL	Civil Lines	45505
Total Population			3,39609

It is pertinent to mention here that M.A Jinnah road is primary bifurcating component *viz a viz* population-wise as well as area-wise and as such the delimitation proposed by ECP is not as compact as compare to limitation suggested by the applicant(s). The maps revealing suggested delimitation of above said constituencies is attached herewith for your kind perusal and comparison of both maps reveals that amendment proposal by applicant(s) is purely accordingly to the objective of law as will legal principles settled in this regard.



M. H. M.
3/14/8

PS-109 Delimitation by ECP From 5

Charge No.	Circle	Sub -Divion	Population
	ALL	Garden	365,323
	Total Population		365,323

District South PS-109 Proposed by applicants

Charge No	Circle	Suab-Divion	Population
12	ALL	Liyari	43583
14	ALL	Liyari	40967
15	ALL	Liyari	36550
01	ALL	Garden	48270
02	ALL	Garden	40000
03	ALL	Garden	35774
04	ALL	Garden	47442
05	ALL	Garden	46431
06	ALL	Garden	37831
	Total Population		376848

It is also not out of place to state here that while onelyzing as well as keeping in view geographic compactness of the constituencies as per location have been badly affected. That delimitation proposed by ECP is not compact as compare to suggested by the applicants the maps revealing suggested delimitation above constituencies is attached herewith for your kind perusal and comparison of both maps reveals that amendment proposal by applicant entirely as per mandate of delimitation regared in similarly circumstance.



1/1/2018
M. H. S. S.

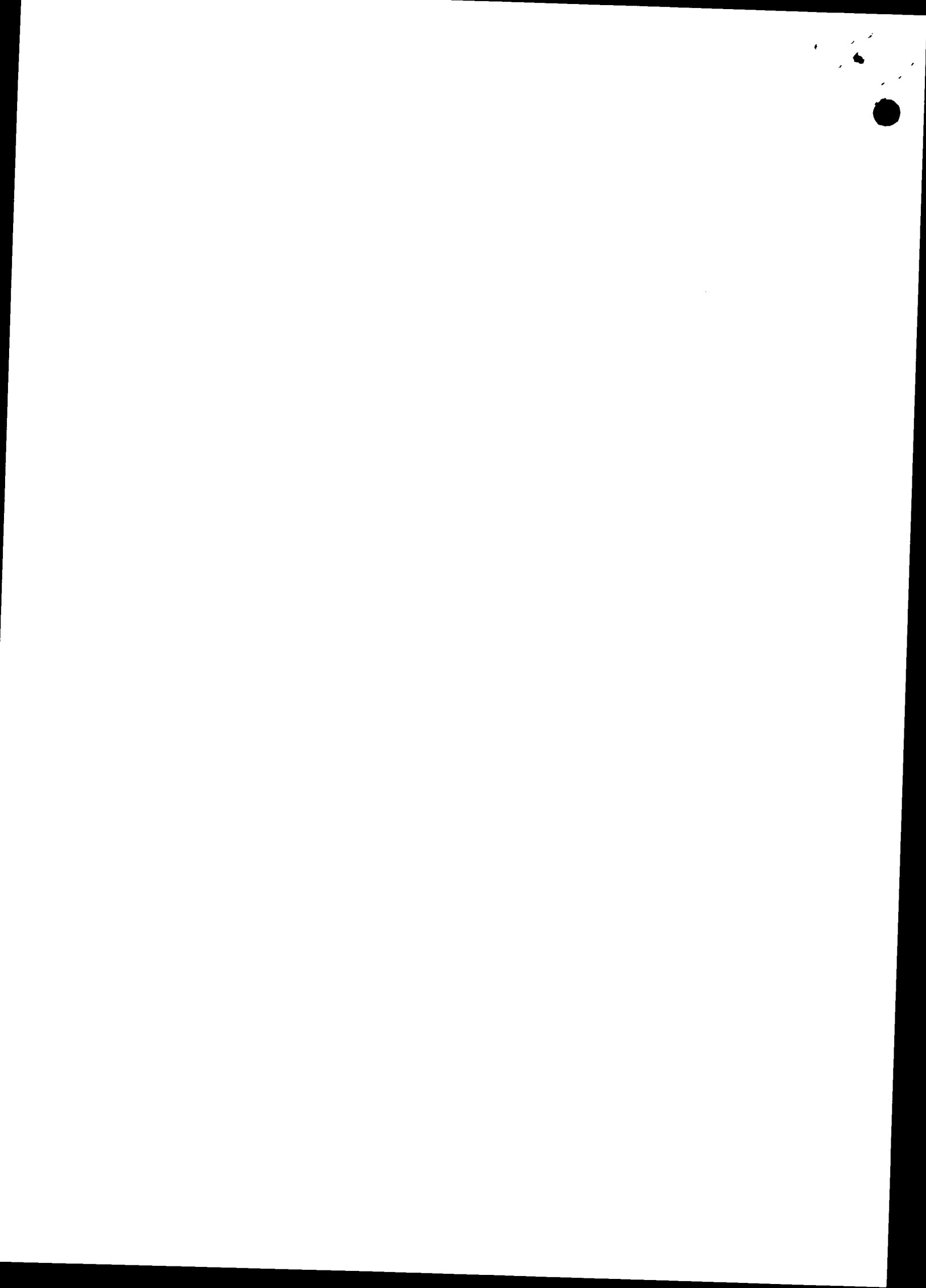
PS- 108 Delimitation by ECP From 5

CHARGE NO	CIRCLE	SUB-DIVISION	POPULATION
01	ALL	Liyari	45,482
09	ALL	Liyari	52,431
10	ALL	Liyari	39,639
11	ALL	Liyari	47,034
12	ALL	Liyari	43,583
13	ALL	Liyari	42,604
14	ALL	Liyari	40,967
15	ALL	Liyari	36,550
TOTAL POPULATION			348,290

District South PS-108 Proposed by applicants

CHARGE NO	CIRCLE	SUB-DIVISION	POPULATION
01	ALL	Liyari	45482
09	ALL	Liyari	63964
10	ALL	Liyari	39639
11	ALL	Liyari	47034
08	ALL	Liyari	36574
07	ALL	Liyari	49241
06	ALL	Liyari	30223
13	ALL	Liyari	42604
TOTAL POPULATION			354761

It is further submitted that proposed delimitation of constituency No.108 badly affect the compactness thereof in view of in infrastructureas well as population of said constituencies. The convenience of the people and their basic facilities have not been taken into consideration as proposed delimitation will couse serious hamper of people of aver while exec rising stair rights of vote.



M. H. H.
20/11/18

PS- 107 Delimitation by ECP From 5

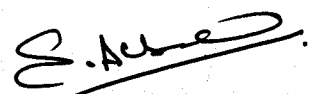
CHARGE NO	CIRCLE	SUB-DIVISION	POPULATION
02	ALL	Liyari	52,033
03	ALL	Liyari	29,618
04	ALL	Liyari	50,176
05	ALL	Liyari	40,439
06	ALL	Liyari	30,223
07	ALL	Liyari	49,241
08	ALL	Liyari	36,574
01	3 & 4	Liyari	14,689
09	5	Liyari	11,533
01	ALL	Aram Bagh	24,793
TOTAL POPULATION			339,319

District South PS-107 Proposed by applicants

CHARGE NO	CIRCLE	SUB-DIVISION	POPULATION
02	ALL	Liyari	52033
03	ALL	Liyari	29618
04	ALL	Liyari	50176
05	ALL	Liyari	40439
01	3 & 4	Liyari	14689
01	ALL	Aram Bagh	24793
02	ALL	Aram Bagh	34523
10	3 & 4	Gardan	26574
09	5	Gardan	25970
08	ALL	Gardan	27594
07		Gardan	29437
TOTAL POPULATION			355,846

8. In view of above narrations it is hmbly submitted that in case the amendment suggested by applicant(s) are acted upon it finely , would not only save irrational distribution but so also shall make the constituencies compact without changing their geographical status .Which is obviously the basic objective of such delimitation.
9. This will meet the ends of justice if your honors may be pleased to consider the representation / objections proposed by applicant(s) of P.S accordingly and allows the proposal amendment in delimitation made by the applicants.





Applicant as:- for himself

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