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March 31, 2018

The Secretary
Election Commission of Pakistan
G-5/2, Constitution Avenue, Islamabad.

Subject: LEGAL OBJECTIONS AND PROPOSALS OVER THE PRELIMINARY LIST OF PROVINCIAL ASSEMBLY CONSTITUENCIES OF DISTRICT NAUSHAHRO FEROZE

Dear Sir,

The undersigned applicant submits as under: -

1. With reference to Notification No.F.8(3)/2018-Elec-I dated 5th March, whereby 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 the criteria for delimitation of National and Provincial Assembly Constituencies is laid down in sub-section (1) of Section 20 of the Elections Act, 2017 is as under: -

"All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of 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."

3. In view of above discussion, I hereby submit my **LEGAL OBJECTIONS** and **PROPOSALS** to preliminary list of Provincial Assembly constituencies namely PS-33 Naushahro Feroze-I, PS-34 Naushahro Feroze-II, PS-35 Naushahro Feroze-III and PS-36 Naushahro Feroze-IV.

LEGAL OBJECTIONS

4. The Preliminary list of National Assembly constituencies of district Naushahro Feroze have been made in violation of sub-section (1) of Section 20 of the Elections Act, 2017.

- A. The difference of population is **37,195** between PS-33 Naushahro Feroze-I having population 3,92,795 being smaller and PS-35 Naushahro Feroze-III having population 4,29,980 being bigger.
- B. The population of the proposed PS-35 Naushahro Feroze-III is not in conformity with population criteria.
- C. That preliminary list of constituencies are in conformity with geographically compact area, facilities of communication, public convenience and other cognate factors to ensure homogeneity and thus fulfilling the requirements contained in sub-section (1) of Section 20 of the Elections Act, 2017 **except population criteria**.

WITHOUT PREJUDICE to above legal objections, Constituency-Wise Proposals are as under: -

PROPOSAL

1) **PROPOSED PS-33 NOUSHAHRO FEROZE-I**

(a) Kandiaro Taluka = **3,22,439**

(b) The following areas of Mehrabpur Taluka included:

(i) TC Halani of STC Halani = 8,932

(ii) TC Behlani of STC Halani = 15,965

(iii) TC Dehat of STC Halani = 20,435

(iv) TC Kotri of STC Halani = 17,570

(v) Town Committee Halani = 23,419

Total: 8,932 + 15,965 + 20,435 + 17,570 + 23,419 = **86,321**

Ⓐ **Grand Total: 3,22,439 + 86,321 = 4,08,760 i.e. 25.35%**

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2) **PROPOSED PS-34 NOUSHAHRO FEROZE-II**

(a) Bhiria Taluka excluding following areas:

- (i) TC Mad Aleem of STC Bhiria = 27,659
- (ii) TC Tharushah of STC Bhiria = 10,769
- (iii) TC Molhan of STC Bhiria = 11,541
- (iv) TC Dalipota of STC Bhiria = 14,448

Total: 3,01,044 - 27,659 - 10,769 - 11,541 - 14,448 = 2,36,627

(b) Mehrabpur Taluka excluded following areas:

- (i) TC Halani of STC Halani = 8,932
- (ii) TC Behlani of STC Halani = 15,965
- (iii) TC Dehat of STC Halani = 20,435
- (iv) TC Kotri of STC Halani = 17,570
- (v) Town Committee Halani = 23,419

Total: 2,47,280 - 8,932 - 15,965 - 20,435 - 17,570 - 23,419 = 1,60,959

@ **Grand Total: 2,36,627 + 1,60,959 = 3,97,586 i.e. 24.66%**

3) **PROPOSED PS-35 NOUSHAHRO FEROZE-III**

(a) Naushahro Feroze Taluka excluding following areas:

- (i) TC Vissor of STC Darya Khan Mari = 12,920
- (ii) TC Sahib Khan of STC Darya Khan Mari = 4,877
- (iii) TC Masurjiwai of STC Darya Khan Mari = 6,798
- (iv) TC Loothi of STC Darya Khan Mari = 5,460

Total: 3,72,821 - 12,920 - 4,877 - 6,798 - 5,460 = 3,42,766

(b) The following areas of Bhiria Taluka included:

- (i) TC Mad Aleem of STC Bhiria = 27,659
- (ii) TC Tharushah of STC Bhiria = 10,769
- (iii) TC Molhan of STC Bhiria = 11,541
- (iv) TC Dalipota of STC Bhiria = 14,448

Total: 27,659 + 10,769 + 11,541 + 14,448 = 64,417

@ **Grand Total: 3,42,766 + 64,417 = 4,07,183 i.e. 25.25%**

4) **PROPOSED PS-36 NOUSHAHRO FEROZE-IV**

(a) Moro Taluka = 3,68,789

(b) The following areas of Naushahro Feroze Taluka included:

- (i) TC Vissor of STC Darya Khan Mari = 12,920
- (ii) TC Sahib Khan of STC Darya Khan Mari = 4,877
- (iii) TC Masurjiwai of STC Darya Khan Mari = 6,798
- (iv) TC Loothi of STC Darya Khan Mari = 5,460

Total: 12,920 + 4,877 + 6,798 + 5,460 = 30,055

@ **Grand Total: 3,68,789 + 30,055 = 3,98,844 i.e. 24.74%**

Copy of the Proposed Map of Provincial Assembly constituencies are attached herewith for ready reference.

I look forward to hearing from you and hope that your goodness will take some necessary action in this matter and do needful in this regard.

Thanking you.

Yours Sincerely

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