

To,

Respected
The Secretary
Election Commission of Pakistan
Islamabad.

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03-04-18

From,

Sheeraz Zai S/o Muhammad Ishtiaque
Address: House No: 695, Near Goushala Usmanabad,
Hyderabad
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REPRESENTATIONS/OBJECTIONS
UNDER SECTION 21 OF ELECTIONS ACT, 2017
READ WITH RULE 11 AND 12 THE ELECTION RULES 2017,
AGAINST DELIMITATION OF PS-62, HYDERABAD-I-, PS-63,
HYDERABAD-II-, PS-64, HYDERABAD-III-, PS-65,
HYDERABAD-IV-, PS-66, HYDERABAD-V-, PS-67,
HYDERABAD-VI-, DISTRICT, HYDERABAD SINDH

The Applicant/Objector being aggrieved and dissatisfied after having gone through the preliminary report of delimitation of the constituencies of National and Provincial Assemblies issued/published vide Notification No: F.8(3)/2018-Elec-I dated 05-03-2018, in respect of the **Constituency No: PS-62, Hyderabad -I-, PS-63, Hyderabad -II-, PS-64, Hyderabad -III-, PS-65, Hyderabad -IV-, PS-66, Hyderabad -V-, PS-67, Hyderabad -VI-, District Hyderabad,** respectfully makes the representations/objections for the amendments, alterations, or modifications in the preliminary list of constituencies considering the following facts and grounds:

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BRIEF FACTS

1. That, the applicant/objector is a citizen of Pakistan and resides on the above mentioned address and is the voter in the constituency of PS-67, Hyderabad-VI, District Hyderabad in accordance with the preliminary report as published in respect of the delimitation of the constituencies by the Election Commission of the Pakistan.
2. That, the delimitation of PS-62, Hyderabad -I-, PS-63, Hyderabad -II-, PS-64, Hyderabad -III-, PS-65, Hyderabad -IV-, PS-66, Hyderabad -V-, PS-67, Hyderabad-VI-, District Hyderabad published in preliminary report of delimitation of constituencies is as under:

No. and Name of Constituency	Extent of the Constituency	Population
PS-62 Hyderabad -I	a) Taluka Qasimabad Excluding Census Charge No. 2 of Hyderabad	299581
	Cantonment (Part) Taluka Qasimabad and	
	b) The following Tapedar Circles of Hatri	
	STC of Hyderabad (R) Taluka	
	(i) Addl Kathri	19519
	(ii) Kathri and	19290
	(iii) Hatri	35566
	of District Hyderabad	
	TOTAL	373,956
	PS-63 Hyderabad -II	Hyderabad (R) Taluka Excluding the Following areas
(i) Town Commeeetee Husri		
(ii) Tapedar Circle Kathri of Hatri STC		
(iii) Tapedar Circle Kathri of Hatri STC and		
(iv) Tapedar Circle Addl Kathri of Harti STC and of District Hyderabad		
TOTAL		371,322
PS-64 Hyderabad -III	a) The Following areas of Latifabad Taluka	
	(i) Census Charge No. 17	17894

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	(ii) Census Charge No. 18	12009
	(iii) Census Charge No. 19	32259
	(iv) Census Charge No. 20	31990
	(v) Census Charge No. 21	47116
	(vi) Census Charge No. 22	27643
	(vii) Census Charge No. 23	24594
	(viii) Census Charge No. 24	20514
	(ix) Census Charge No. 25	16714
	(x) Census Charge No. 26	39805
	(xi) Census Charge No. 27	24630
	b) Town Commettee Husri Taluka Hyderabad	21073
	c) Census Circle No. 3, 4, 5 & 6 of Charge no. 3 (part) of Hyderabad Cantonment of Taluka Latifabad and	31287
	(d) Census Charge no 26 Hyderabad City Taluka of District Hyderabad	34328
	TOTAL	381,856
PS-65 Hyderabad-IV	The following Census Charges of Latifabad Taluka	
	i) Census Charge No.1,	44573
	ii) Census Charge No.2	18119
	iii) Census Charge No.3,	22286
	iv) Census Charge No.4,	9397
	v) Census Charge No.5,	22213
	vi) Census Charge No.6,	33299
	vii) Census Charge No.7,	22392
	viii) Census Charge No.8,	23823
	ix) Census Charge No.9,	25886
	x) Census Charge No.10,	27427
	xi) Census Charge No.11,	17344
	xii) Census Charge No.12,	30882
	xiii) Census Charge No.13,	15172
	xiv) Census Charge No.14,	18174
	xv) Census Charge No.15, and	15451
	xvi) Census Charge No.16, of District Hyderabad.	19787
	Total	366,225
PS-66 Hyderabad-V	The following Census Charges of Hyderabad City Taluka:-	
	i) Census Charge No.15,	26126
	ii) Census Charge No.16,	33990
	iii) Census Charge No.17,	21098
	iv) Census Charge No.18,	29744
	v) Census Charge No.19,	15952
	vi) Census Charge No.20,	17573
	vii) Census Charge No.21,	9046
	viii) Census Charge No.22,	25205
	ix) Census Charge No.23,	13055

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	x) Census Charge No.24,	11044
	xi) Census Charge No.25,	17952
	xii) Census Charge No.27,	12515
	xiii) Census Charge No.28,	20696
	xiv) Census Charge No.29,	15494
	xv) Census Charge No.30,	21859
	b) The following Census Charges of Hyderabad Cantonment of Hyderabad City Taluka;-	
	i) Census Charges No.1 (Part),	21389
	ii) Census Charges No.2 (Part) and	16965
	c) Census Charge No.2 (Part) of Hyderabad Cantonment of Qasimabad Taluka	5318
	d) Census Circle No.1&2 of charge No. 3 (Part) of Hyderabad Cantonment of Latifabad Taluka and	11111
	e) Census Circle No. 1 & 2 of Charge No. 3 (Part) of Hyderabad Cantonment of Taluka Latifabad	13720
	of District Hyderabad.	
	Total	359,852
PS-67 Hyderabad-VI	The following Census Charges of Hyderabad City Taluka;-	
	i) Census Charge No.1,	15,286
	ii) Census Charge No.2	33,079
	iii) Census Charge No.3,	64,045
	iv) Census Charge No.4,	29,721
	v) Census Charge No.5,	23,526
	vi) Census Charge No.6,	17,244
	vii) Census Charge No.7,	20,728
	viii) Census Charge No.8,	28,185
	ix) Census Charge No.9,	22,380
	x) Census Charge No.10,	21,729
	xi) Census Charge No.11,	15,888
	xii) Census Charge No.12,	14,116
	xiii) Census Charge No.13,	20,023
	xiv) Census Charge No.14,	21,918
	of District Hyderabad.	
	Total	347,868

3. That, the applicant/objector is interested to ensure that the pre-poll management and all other matters relating to the conduct of general elections to be conducted in fair manner and as per the spirit of the Constitution, settled laws, rules and principles to ensure that the true spirit of democracy remains intact and well guarded.

GROUNDS

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1. That, the sheer illegalities and irregularities were carried out in sticto-senso while delimiting the constituencies of Hyderabad **PS-62**, Hyderabad -I-, **PS-63**, Hyderabad -II-, **PS-64**, Hyderabad -III-, **PS-65**, Hyderabad -IV-, **PS-66**, Hyderabad -V-, **PS-67**, Hyderabad -VI-, District Hyderabad.
2. That, the principles of delimitations as laid down in Elections Act, 2017 and the Election Rules, 2017 were not followed in line with the said act and rules having malafide intentions and ulterior motives.
3. That, the violation of the Constitution of Islamic Republic of Pakistan, 1973 has been committed in toto, it is pertinent to mention here that every institution formed constitutionally is bound to act upon the constitution in its letter and spirit.
4. That, the Election Commission is vested with powers under the elections laws including Act and Rules, 2017 as to rectify the delimitation of constituencies after considering the representations/objections of the applicant/objector.
5. That, the delimitation always conducted to ensure fair, just and proportional representation of people in the elections where in the instant case it is vice versa.
6. That, the actual gist and rational behind the democratic process under fundamental rights protected under the constitution is on the basis of rational appropriate and customize delimitation.

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- 7. That, it is vested duty of the Election Commission to rectify the delimitation of the elections constituency which are against the elections laws, norms, customs, rational and conveniences of the public.
- 8. That, repeated attempts of Gerrymandering have been made to establish political advantage for a particular political party and group.
- 9. That, unbalanced discriminatory delimitation has been done in respect of abovementioned constituency.
- 10. That, delimitation under objection is intended to defeat the ends of justice and the objects of the statues.
- 11. That, there is glaring malafides or criminal negligence on the part of the staff having conducted the delimitation proceedings in respect of abovementioned constituency.
- 12. That, the delimitation process should have been started from North and run in clock wise direction while this principle was not observed and it can be seen from the maps of preliminary report of delimitation that areas runs in haphazard manner.
- 13. That, other existing and relevant laws of the country has not been taken into consideration at the time of preliminary delimitation.
- 14. That, the drastic departure and deviation from the guiding principles of the delimitation can be witnessed prima facie.
- 15. That, the representation/objections have been filed with in time.

16. That, the applicant/objector craves permission to raise any legal factual relevant ground at the time of hearing these representations/objections as permission under law.

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PROPOSAL

1. That, the applicant/objector is submitting proposal after making proper ground surveys and he has taken into consideration all the relevant factors as envisaged under the Elections Act and Rules, 2017
2. That, applicant/objector proposes that the delimitation of the constituency **PS-62**, Hyderabad -I-, **PS-63**, Hyderabad -II-, **PS-64**, Hyderabad -III-, **PS-65**, Hyderabad -IV-, **PS-66**, Hyderabad -V-, **PS-67**, Hyderabad-VI-, District Hyderabad be made as under:

No. and Name of Constituency	Extent of the Constituency	Population
PS-62 Hyderabad -I	a) Taluka Qasimabad Excluding Census	
	Charge No. 2 of Hyderabad	299581
	Cantonment (Part) Taluka	
	Qasimabad and	
	b) The following Tapedar Circles of Hatri	
	STC of Hyderabad (R) Taluka	
	(i) Addl Kathri	19519
	(ii) Kathri and	19290
	(iii) Hatri	35566
	of District Hyderabad	
	TOTAL	373,956
PS-63 Hyderabad -II	Hyderabad (R) Taluka Excluding the	
	Following areas	371,322
	(i) Town Commettee Husri	
	(ii) Tapedar Circle Kathri of Hatri STC	
	(iii) Tapedar Circle Kathri of Hatri STC and	

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	(iv) Tapedar Circle Addl Kathri of Harti STC and of District Hyderabad	
	TOTAL	371,322
PS-64 Hyderabad -III	a) The Following areas of Latifabad Taluka	
	i) Census Charge No.16	19787
	(i) Census Charge No. 17	17894
	(ii) Census Charge No. 18	12009
	(iii) Census Charge No. 19	32259
	(iv) Census Charge No. 20	31990
	(v) Census Charge No. 21	47116
	(vi) Census Charge No. 22	27643
	(vii) Census Charge No. 23	24594
	(viii) Census Charge No. 24	20514
	(ix) Census Charge No. 25	16714
	(x) Census Charge No. 26	39805
	(xi) Census Charge No. 27	24630
	b) Town Commettee Husri Taluka Hyderabad	21073
	c) Census Circle No. 3, 4, 5 & 6 of Charge no. 3 (part) of Hyderabad Cantonment of Taluka Latifabad and	31287
	e) Census Circle No. 1 & 2 of Charge No. 3 (Part) of Hyderabad Cantonment of Taluka Latifabad	13720
	TOTAL	381,035
PS-65 Hyderabad-IV	The following Census Charges of Latifabad Taluka	
	i) Census Charge No.1,	44573
	ii) Census Charge No.2	18119
	iii) Census Charge No.3,	22286
	iv) Census Charge No.4,	9397
	v) Census Charge No.5,	22213
	vi) Census Charge No.6,	33299
	vii) Census Charge No.7,	22392
	viii) Census Charge No.8,	23823
	ix) Census Charge No.9,	25886
	x) Census Charge No.10,	27427
	xi) Census Charge No.11,	17344
	xii) Census Charge No.12,	30882
	xiii) Census Charge No.13,	15172
	xiv) Census Charge No.14,	18174
	xv) Census Charge No.15, and of District Hyderabad.	15451
	Total	346,438
PS-66 Hyderabad-V	The following Census Charges of Hyderabad City Taluka;-	
	ii) Census Charge No.16,	33990
	iii) Census Charge No.17,	21098

vii) Census Charge No.21,	9046
viii) Census Charge No.22,	25205
ix) Census Charge No.23,	13055
x) Census Charge No.24,	11044
xi) Census Charge No.25,	17952
xi) Census Charge No.26	34328
xii) Census Charge No.27,	12515
xiii) Census Charge No.28,	20696
xiv) Census Charge No.29,	15494
xv) Census Charge No.30,	21859
b) The following Census Charges of Hyderabad	

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	iv) Census Charge No.18,	29744
	v) Census Charge No.19,	15952
	vi) Census Charge No.20,	17573
	vii) Census Charge No.21,	9046
	viii) Census Charge No.22,	25205
	ix) Census Charge No.23,	13055
	x) Census Charge No.24,	11044
	xi) Census Charge No.25,	17952
	xi) Census Charge No.26	34328
	xii) Census Charge No.27,	12515
	xiii) Census Charge No.28,	20696
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	b) The following Census Charges of Hyderabad	
	Cantonment of Hyderabad City Taluka:-	
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	c) Census Charge No.2 (Part) of Hyderabad	
	Cantonment of Qasimabad Taluka	5318
	d) Census Circle No.1&2 of charge No. 3 (Part) of	
	Hyderabad Cantonment of Latifabad Taluka and	11111
	of District Hyderabad.	
	Total	354,334
PS-67 Hyderabad-VI	The following Census Charges of Hyderabad City	
	Taluka:-	
	i) Census charge No.01,	15286
	ii) Census Charge No.2	33079
	iii) Census Charge No.3,	64045
	iv) Census Charge No.4,	29721
	v) Census Charge No.5,	23526
	vi) Census Charge No.6,	17244
	vii) Census Charge No.7,	20728
	viii) Census Charge No.8,	28185
	ix) Census Charge No.9,	22380
	x) Census Charge No.10,	21729
	xi) Census Charge No.11,	15888
	xii) Census Charge No.12,	14116
	xiii) Census Charge No.13,	20023
	xiv) Census Charge No.14,	21918
	xivv) Census charge No.15,	26126
	of District Hyderabad.	
	Total	373,994

3. That, the required proposed marked maps of all the constituencies getting effects/changes from the desired/proposed delimitation of the above

mentioned constituency have been marked accordingly so that none of the constituency may create any hurdle.

(Copy of the Map is attached as annexure "A")

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4. That, the proposed tabulated format of all the constituencies of district Hyderabad after the change in PS-62, Hyderabad -I-, PS-63, Hyderabad -II-, PS-64, Hyderabad -III-, PS-65, Hyderabad -IV-, PS-66, Hyderabad -V-, PS-67, Hyderabad-VI-, is also being submitted.

(Copy of the Proposed Delimitation of District Hyderabad is attached as annexure "B")

PRAYER

It is respectfully prayed that this Honorable Election Commission of Pakistan may be pleased to delimit the constituency i.e. PS-62, Hyderabad -I-, PS-63, Hyderabad -II-, PS-64, Hyderabad -III-, PS-65, Hyderabad -IV-, PS-66, Hyderabad -V-, PS-67, Hyderabad-VI-, District Hyderabad, Sindh as proposed by the applicant/objector.

Hyderabad

Date: 03-04-2018

APPLICANT/OBJECTOR

Sheeraz Zai S/o

Muhammad Ishtiaque

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