

To,

Respected
The Secretary
Election Commission of Pakistan
Islamabad.

Mr
03-04-18

From,

Mefooz ahmed Khan S/o Mehmood khan
Address: House No: 453 street No 04 nusrat colony hali
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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-64, HYDERABAD-III-
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-64, Hyderabad -III-, 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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03-04-18**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-64, Hyderabad-III-, 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-64, Hyderabad-III-, District Hyderabad published in preliminary report of delimitation of constituencies is as under:

PS-64 Hyderabad -III	a) The Following areas of Latifabad Taluka	
	(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
	(d) Census Charge no 26 Hyderabad City Taluka of District Hyderabad	34328
	TOTAL	381,856

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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.

GROUND

1. That, the sheer illegalities and irregularities were carried out in sticto-senso while delimiting the constituencies of Hyderabad specially PS-64, Hyderabad -III-, 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

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- 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.
 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.

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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.

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

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2. That, applicant/objector proposes that the delimitation of the constituency PS-64, Hyderabad-III-, District Hyderabad be made as under:

PS-64 Hyderabad -III	a) The Following areas of Latifabad Taluka	
		(i) Census Charge No. 16
	(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	21073
	Hyderabad	
	c) Census Circle No. 3, 4, 5 & 6 of Charge	31287
	no. 3 (part) of Hyderabad Cantonment	
	(d) Census Charge no 26 Hyderabad City	34328
	Taluka of District Hyderabad	
	TOTAL	401,643

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-64, Hyderabad-III-, 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-64, Hyderabad-III-, District Hyderabad, Sindh as proposed by the applicant/objector.

Hyderabad

Date: 03-04-2017



APPLICANT/OBJECTOR

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