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**To,**  
Respected  
The Secretary  
Election Commission of Pakistan  
Islamabad.

**From,**  
**Faisal farooq** S/o Umer farooq  
Address: House No: f-31/318 foujdari road, Hyderabad  
CNIC No: 41303-0723291-5,  
Cell No: 0300-9371711

**REPRESENTATIONS/OBJECTIONS**  
**UNDER SECTION 21 OF ELECTIONS ACT, 2017**  
**READ WITH RULE 11 AND 12 THE ELECTION RULES 2017,**  
**AGAINST DELIMITATION OF PS-66, HYDERABAD-V-,**  
**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-66, Hyderabad -V-, 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-66, Hyderabad-V-, 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-66, Hyderabad-V-, District Hyderabad published in preliminary report of delimitation of constituencies is as under:

<b>PS-66 Hyderabad-V</b>	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
	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	

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	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.	
	<b>Total</b>	<b>359,852</b>

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

1. That, the sheer illegalities and irregularities were carried out in sticto-senso while delimiting the constituencies of Hyderabad specially PS-66, Hyderabad -V-, 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

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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.
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.

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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-66, Hyderabad-V-, District Hyderabad be made as under:

<b>PS-66 Hyderabad-V</b>	The following Census Charges of Hyderabad City Taluka;	
	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
	x) Census Charge No.24,	11044
	xi) Census Charge No.25,	17952
	<b>xi) Census Charge No.26</b>	<b>34328</b>
	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 of District Hyderabad.	11111
	<b>Total</b>	<b>354,334</b>

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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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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")*

4. That, the proposed tabulated format of all the constituencies of district Hyderabad after the change in PS-66, Hyderabad-V-, 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-66, Hyderabad-V-, District Hyderabad, Sindh as proposed by the applicant/objector.

Hyderabad

Date: 03-04-2018



**APPLICANT/OBJECTOR**

Faisal farooq S/o

Umer farooq

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foujdari road, Hyderabad

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