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

**DATED 02.04.2018**

Subject: **MEMORANDUM OF REPRESENTATION AGAINST  
THE DELIMITATION OF THE CONSTITUENCIES OF  
DISTRICT BADIN**

Respected Sir,

The applicant is the voter of the constituency P.S 71 and N.A 229, District Badin, most humbly and respectfully brings 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**

Pir Baksh Khan Hashmani s/o Haji Mubark Khan Hashmani, having CNIC No. 41104-1987915-1, r/o Village Serie Mubark Khan Hashmani, Taluka Tando Bago, District Badin, Sindh.

**OBJECTIONS ON THE CONSTITUENCIES OF P.S 70, P.S 71, P.S 72 AND P.S 73, P.S 74, of DISTRICT BADIN**

1. The total population of the District Badin is **18,04,516**. District Badin consists of two Seats of National Assembly bearing N.A No. 229 and 230 and five seats of Provincial Assembly i.e. P.S 70, P.S 71, P.S 72 AND P.S 73, P.S 74, allocated by the ECP. The population of the constituencies is at more variance than it should have been on the basis of rational division of the whole population of District Badin either on the basis of formula fixed by the ECP or on the basis



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average distribution or at proportionate distribution of the population between the constituencies of District Badin Sindh. Which comes to:

**18,04,516 / 5 = 360,903 for each Provincial Assembly Seat**

**18,04,516 / 2 = 902,258 for each National Assembly Seat**

2. The total population of PS-70, Badin-I by ECP, is **344,689** while the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 360,903. If the compliance of sub-section (3) of section 20 of the Act, 2017 is made at variance of 10% of the population then too becomes more than the average fixed by the ECP. Hence in order to rationalize the population between the constituencies of the District Badin, the proposal is given below.

***20 (3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.***

3. The exclusion of one Tappa circles vis A. Arain (with population of 9530) from P.S 70 would not only imbalance the population census, but so also would become a situation of gerrymandering, as it would have a far bearing effect on the area and crosses the average population of 360,903. Therefore the said T.C A. Arain needs to be included in P.S 70 which would make the census of the P.S 70 more rational and nearest to the formula fixed by the ECP. By inclusion of the T.C A.Arain the total population of P.S 70 comes to **354,219**.
4. The proposed population of PS-71, Badin-II, as Proposed by ECP is **375,361**. While the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 360,903. Two T.C namely T.C Addori having population of 26137 and T.C A.Arain



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having population of 9530 total 35,667 should be excluded from P.S 71 while T.C Walhar having population of 10257 and T.C Shorki having population of 10966 total population 21,223, should be taken from P.S 73 and merged into P.S 71 thus the total population added or excluded from P.S 71, would not make it lesser or bigger in population rather make it proportionate with other P.S population. The proposed population by the applicant for the P.S 71 thus becomes **360,917**.

5. The population of PS-72, by ECP, is 361,341. While the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 360,903. T.C Kamaro having population of 10655 and T.C Sararo having population of 11483 total 22138 should be excluded from P.S 72 and be merged into P.S 73. While the T.C Addori having population of 26137 is being included in the P.S 72. Thus the total proposed population of P.S 72 Badin-II becomes **365,340**. Thus the proposed equation submitted herein above is more compact and geographically suitable.

6. The population of PS-73, by ECP, is 358,921. While the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 360,903. The T.C Kamaro having population of 10655 and T.C Sararo having population of 11483 total population 22138 should be excluded from P.S 72 and be merged into P.S 73, while T.C Walhar having population of 10257 and T.C Shorki having population of 10966 total population 21,223, may be excluded and be merged into P.S 71 Badin-II. Thus the total



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proposed population prepared by the applicant for P.S 73 would become **359,836** which within the ceilings of ECP.

7. That while there is no change proposed in P.S 74 Badin-IV.
8. That Administrative unites have also been broken in terms of Union Councils of local Government.
9. That the delimitation authorities have not followed the mandatory provisions of law and the conditions laid down in section 20 of the Election Act, 2017, which provides as under:

***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 features, 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 delimiting 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.***

Even on the basis of the above proposed amendments only minor changes are proposed which would not only save irrational distribution of population but so also shall make the constituencies compact without changing their geographical status.





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That this will meet with the ends of justice if your honour may be pleased to consider the representation / objections and allows the proposals made by the applicant.



APPLICANT

