

IN THE ELECTION COMMISSION OF PAKISTAN AT ISLAMABAD

Through its Secretary

REPRESENTATION NO. _____ OF 2018

1. **FARHAN**
S/O USMAN GHANI
Muslim, Adult, Resident of H/No. Z-235,
Shaheed Usman Ghani Street, Chanesar Goth Karachi.
2. **AFTAB NAWAZ**
S/O Nawaz Ali
Muslim, Adult, Resident of H/No. Z-361,
Chanesar Goth, East Karachi
3. **LIAQUAT SAEED LODHI**
S/O Sair Ahmed Khan
Muslim, Adult, Resident of Flat No. AJ1/2,
Jacob Line Housing Complex, East Karachi.
4. **NADEEM KHAN**
S/O Lateef ur Rehman
Muslim, Adult, Resident of H/No. 1/2A,
Jamshed Town, East Karachi
5. **MUHAMMAD NAWAZ**
S/O Allah dad Chaudhry
Muslim, Adult, Resident of H/No. R-110,
Lines Area, East Karachi.
6. **AFTAB MALIK**
S/O Saif ul Malook
Muslim, Adult, Resident of H/No. A-122,
Darwesh Colony, East Karachi.
7. **ZAMRUD KHAN**
S/O Taj Muhammad
Muslim, Adult, Resident of H/No. A/114,
Darwesh Colony, East Karachi
8. **ABDUL JALIL,**
S/O Manzoor Ahmed
Muslim, Adult, Resident of East, Karachi.
9. **JAMSHED HUSSAIN**
S/O Yar Muhammad
Muslim, Adult, Resident of H/No. A-27,
Baran Goth, Jamshed Town, East Karachi.
10. **MUHAMMAD ALI**
s/o Muhammad Afzal
Muslim, Adult, Resident of H/No. 12/6,
Patel Para , East Karachi
11. **MALIK MUHAMMAD SHAFIQ**
S/O Malik Muhammad Siddiq
Muslim, Adult, Resident of H/No. 32-5,
Patel Para, New Town, East Karachi

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12. **MUHAMMAD FAISAL**
S/O Muhammad Azam Raja
Muslim, Adult, Resident of H/No.431,
Baran Goth, Lasbella, East Karachi
13. **MUHAMMAD AZAM BALOCH**
S/O Murrad Bux
Muslim, Adult, Resident of H/No. A-1,
Haji Leemon Goth, Gulshan-e-Iqbal, East Karachi
14. **MUHAMMAD ARIF KHAN JAMALI**
S/O Hoat Khan Jamali
Muslim, Adult, Resident of H/No.807,
Jamali Colony, 13D , East Karachi
15. **RAHEEM BUX**
S/O Qadir Bux
Muslim, Adult, Resident of H/No. R-42,
Sindhi Para, Mujahid Colony, Dalmia, East Karachi
16. **MUHAMMAD MURAD BALOCH**
S/O Saleh Muhammad
Muslim, Adult, Resident of H/No.A/C,6A-178-46-8,
Baloch Goth, 13D/3 Gulshan-e-Iqbal, East Karachi
17. **HASSAM HUSSAIN RAJPUR**
S/O Gulzar Hussain Rajpur
Muslim, Adult, Resident of H/No. R-28,
Sindhi Para, Shanti Nagar, Gulshan-e-Iqbal , East Karachi
18. **AZHAR ALI**
S/O Akbar Ali Arain
Muslim, Adult, Resident of H/No.R-10,
Haroon Banglows , Scheme 33, Gulzar-e-Hijri, Karachi
19. **ZULFIQAR ALI**
S/O Ali Muhammad
Muslim, Adult, Resident of H/No.D-406,
Gulshan-e-Iqbal Town, East Karachi.
20. **ABID HUSSAIN**
S/o Badar uddin
Muslim, Adult, Resident of Moula Gujro,
Guzlar-e-Hijri, East Karachi
21. **MUHAMMAD ADNAN**
S/O Sultan Muhammad
Muslim, Adult, Resident of H/No.A/50, Block-4,
Gulshan Town, Sub Division Gulzar-e-Hijri, East Karachi
22. **MUHAMMAD ALI**
S/O Mazaar Khan
Muslim, Adult, Resident of Gulshan Baloch , Yousuf Goth,
Sub Division Gulzar-e-Hijri, East Karachi.
23. **SAIMA JABEEN**
W/O Majid Khan
Muslim, Adult, Resident of H/No.R-424, Gulshan-e-Zahoor,
Jacob line, Sector 2B, Jamshed Town, East Karachi
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24. **FARAZ AHMED**

S/O Sohail Syed

Muslim, Adult, Resident of H/No.C10/33, Rabia City,
Gulistan-e-Johar, Faisal Cantonment, East Karachi.

25. **SHAMIM AKHTAR**

W/O Bashir Ahmed

Muslim, Adult, Resident of H/No.A-103, Billys Paradise,
Ward-2, Gulistan-e-Johar, Faisal Cantonment , East Karachi.

26. **MUHAMMAD REHAN SIDDIQUE KHAN**

S/O Muhammad Siddique Khan

Muslim, Adult, Resident of H/No. 204,
Gulistan-e-Johar, East Karachi.

27. **AYAZ AHMED**

S/O Riaz Ahmed

Muslim, Adult, Resident of D-6262, Billys Paradise,
Gulistan-e-Johar, Faisal Cantonment, East Karachi.

28. **SAEED AKHTAR**

S/O Muhammad Hafizul Khan

Muslim, Adult, Resident of Flat No.29, Johar Square, A-1,
Gulistan-e-Johar, Faisal Cantonment, East Karachi.

29. **AHMED DEAI**

S/O Musa Desai

Muslim, Adult, Resident of Hunaid City, Gulistan-e-Johar,
Faisal Cantonment Board, East Karachi.

30. **SHAFIQUE HUSSAIN**

S/O Muhammad Ilyas Shaikh

Muslim, Adult, Resident of H/No.305 /5 Billys Paradise,
Gulistan-e-Johar, Faisal Cantonment, East Karachi.

REPRESENTATION UNDER SECTION 21 OF THE ELECTIONS ACT 2017, READ WITH RULE 12 OF THE ELECTION RULES 2017 AGAINST THE DELIMITATION OF PROVINCIAL ASSEMBLY CONSTITUENCY'S PS-99, PS-100, PS-101, PS-102 , PS-103, PS,104, PS-105, PS-106 DISTRICT EAST, KARACHI, SINDH.

We, the voters of PS-99, PS-100, PS-101, PS-102, PS-103, PS,104, PS-105, PS-106 DISTRICT EAST, KARACHI, most humbly and respectfully bring the objections / memorandum of representation against the delimitation made by the ECP and also submit the proposed maps / delimitation of the entire district for your kind consideration. The instant representation if filed by duly authorized attorney of the Petitioners.

(Copy of Power of Attorney is annexed herewith and marked as Annexure "A")

FACTS & GROUNDS:

1. That, the PS-99 is a part of District East, Karachi, which as per the notified Census results, has a population of 3,64,094 people and PS-100 which is also part of District East as per Notification No. F.8(3)2018-Elec-I, dated:5th March 2018 of ECP which has population

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of 3,70,316. PS-99 and PS-100 both PS are compact geographically and both PS are made by ECP perfectly we have no objection on PS-99 and PS-100.

2. That, the PS-101 is a part of District East, Karachi, which as per the notified Census results, has a population of 3,74,912 people.

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Constituency	Extent of the Constituency	Population
PS-101 Karachi East-III	The following Census Charge of Gulshan-e-Iqbal Sub Division	
	i) Census Charge No.7	36694
	ii) Census Charge No.8	26877
	iii) Census Charge No.9	27186
	iv) Census Charge No.10	42257
	v) Census Charge No.11	59984
	vi) Census Charge No.12	25743
	vii) Census Charge No.13	19916
	viii) Census Charge No.14	61342
	ix) Census Charge No.15 and	28182
x) Census Charge No.16	46731	
	Of District East Karachi	
	TOTAL	374,912

3. That, it is pertinent to mention here that as per the proposed delimitation published by the ECP, Charge No.13, of Gulshan-e-Iqbal Sub-Division has been merged with PS-101 which is totally connected with the boundaries of Faisal Cantonment board, District East, Karachi, should be added in Ps- 103, because all other Census Charges of Faisal Cantonment Board are included in Ps-103.

After exclusion of charge No. 13 of Gulshan-e-Iqbal Sub Division, from Ps-101 the result is;

Constituency	Extent of the Constituency	Population
PS-101 Karachi East-III	The following Census Charge of Gulshan-e-Iqbal Sub Division	
	i) Census Charge No.7	36694
	ii) Census Charge No.8	26877
	iii) Census Charge No.9	27186
	iv) Census Charge No.10	42257
	v) Census Charge No.11	59984
	vi) Census Charge No.12	25743
	vii) Census Charge No.14	61342
	viii) Census Charge No.15 and	28182
	ix) Census Charge No.16	46731
	Of District East Karachi	
	TOTAL	354,996

4. That, the PS-102 is a part of District East, Karachi, which has a population of 3,44,474 people of District East as per Notification No. F.8(3)2018-Elec-I, dated:5th March 2018 of ECP.
5. That, Census Charge No 1,2,3,4,5,6,17 of Gulshan-e-Iqbal Sub Division District east, Karachi and Census Charge No.14 of Sub-Division Jamshed Quarters are Compact geographically are connected together, making PS-102 perfectly, Hence no objection.
6. That, the PS-103 is a part of District East, Karachi, which as per the notified Census results, has a population of 3,48,858 people as per Notification No. F.8(3)2018-Elec-I, Dated:5th March 2018 of ECP.

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PROPOSED BY ECP

Constituency	Extent of the Constituency	Population
PS-103 Karachi East-V	a) Faisal Cantonment:	240,164
	b) Census Charge No.25 of Ferozabad Sub Division and	57,468
	c) The following Census Charges of Jamshed Quarters Sub-Division:	
	i) Census Charge No.12 and ii) Census Charge No.13 of District Karachi East.	22,208 29,018
	TOTAL	348,858

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7. That, it is pertinent to mention here that as per the proposed delimitation published by the ECP, Charge No.13, of Gulshan-e-Iqbal Sub-Division has been included in PS-101 which is totally connected with the boundaries of Faisal Cantonment board, District East, Karachi, should be added / included in Ps- 103.
8. That, the Census Charge No. 04 of Sub-Division Ferozabad, District East, is connected with Census Charge no. 25 of Sub-Division Ferozabad, District East, PS-103, hence Census Charge no. 04 of Sub-Division Ferozabad, District East should be included in PS-103.
9. That, the Census Charge no.13 of Sub-Division Jamshed Quarters, District East, should be added/ included in PS-104, whereas Census Charge No.12 of Sub-Division Jamshed Quarters, District East should be added/ included in PS-105, because Census Charge No.13 boundary is connected with PS-104 as per given map of ECP. And boundary of Census Charge no.12 of Sub-Division Jamshed Quarters, District East is connected with the boundaries of Ps-105.

PROPOSED BY PETITIONERS

Constituency	Extent of the Constituency	Population
PS-103 Karachi East-V	a) The following Census Charge of Gulshan-e-Iqbal Sub Division	
	i) Census Charge No.13	19916
	b) Faisal Cantonment	240164
	c) The following Census Charges of Ferozabad Sub Division	
	i) Census Charge No.04	55104
	ii) Census Charges No.25 of District East Karachi	57468
	TOTAL	3,72,652

10. That, the PS-104 is a part of District East, Karachi, which as per the notified Census results, has a population of 3,45,580 people as per Notification No. F.8(3)2018-Elec-I, dated: 5th March 2018 of ECP.

Constituency	Extent of the Constituency	Population
PS-104 Karachi East-VI	Jamshed Quarter Sub Division excluding the following Census i) Census Charge No.12 ii) Census Charge No.13 and iii) Census Charge No.14 of District East Karachi	345,580
	TOTAL	345,580

11. That, the Census Charge No.13 of Sub-Division Jamshed Quarters, District East, should be added/ included in PS-104. As boundaries of Census Charge No.13 of Sub-Division Jamshed Quarters, District East, are connected with the boundaries of Census Charge No.11 of Sub-Division Jamshed Quarters, District East (PS-104).

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Constituency	Extent of the Constituency	Population
PS-104 Karachi East-VI	a) The following Census Charges of Jamshed Quarter Sub Division	
	i) Census Charge No.01	41002
	ii) Census Charge No.02	34568
	iii) Census Charge No.03	36508
	iv) Census Charge No.04	19227
	v) Census Charge No.05	27062
	vi) Census Charge No.06	24865
	vii) Census Charge No.08	47492
	viii) Census Charge No.09	31781
	ix) Census Charge No.10	26893
	x) Census Charge No.11 and	33056
	xi) Census Charge No.13	29018
	of District East Karachi	
	TOTAL	351472

12. That, the PS-105 is a part of District East, Karachi, which as per the notified Census results, has a population of 3,62,332 people as per Notification No. F.8(3)2018-Elec-I, dated: 5th March 2018 of ECP.

Constituency	Extent of the Constituency	Population
PS-105 Karachi East-VII	a) The following Census Charges of Ferozabad Sub Division;	
	i) Census Charge No.01	33457
	ii) Census Charge No.02	30467
	iii) Census Charge No.03	36441
	iv) Census Charge No.04	55104
	v) Census Charge No.13	12046
	vi) Census Charge No.16	30689
	vii) Census Charge No.17	24444
	viii) Census Charge No.18	26566
	ix) Census Charge No.19	20793
	x) Census Charge No.20	22685
	xi) Census Charge No.21	10113
	xii) Census Charge No.22	15490
	xiii) Census Charge No.23 and	17329
	xiv) Census Charge No.24	26708
	of District East Karachi.	
	TOTAL	362,332

13. That, Census Charge No. 07 and 12 of Sub-Division Jamshed Quarter, District East, are connected with Census Charge No. 01 and 02 of Sub-Division Ferozabad, District East, Hence Census Charge No.07 and 12 of Sub Division jamshed Quarter, District East should be added/ included in PS-105.

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Census Charge No.04 of Sub-Division Ferozabad, District East, should be excluded from PS-105, and included in PS-103, due to this inclusion and exclusion from both PS, it will become equal and more balanced PS, and will become more convenient for public at large.

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Constituency	Extent of the Constituency	Population
PS-105 Karachi East-VII	a) The following Census Charges of Jamshed Quarter Sub-Division;	
	i) Census Charge No.07	23126
	ii) Census Charge No.12	22208
	b) The following Census Charges of Ferozabad Sub-Division;	
	i) Census Charge No.01	33457
	ii) Census Charge No.02	30467
	iii) Census Charge No.03	36441
	iv) Census Charge No.13	12046
	v) Census Charge No.16	30689
	vi) Census Charge No.17	24444
	vii) Census Charge No.18	26566
	viii) Census Charge No.19	20793
	ix) Census Charge No.20	22685
	x) Census Charge No.21	10113
xi) Census Charge No.22	15490	
xii) Census Charge No.23 and	17329	
xiii) Census Charge No.24	26708	
	of District East Karachi.	
	TOTAL	352562

14. That, the PS-106 is a part of District East, Karachi, which as per the notified Census results, has a population of 3,43,050 people, as per Notification No. F.8(3)2018-Elec-I, dated: 5th March 2018 of ECP.

Constituency	Extent of the Constituency	Population
PS-106 Karachi East-VIII	The following Census Charges of Ferozabad Sub-Division:	
	i) Census Charge No.05	33328
	ii) Census Charge No.06	14257
	iii) Census Charge No.07	27517
	iv) Census Charge No.08	65095
	v) Census Charge No.09	24010
	vi) Census Charge No.10	22617
	vii) Census Charge No.11	29891
	viii) Census Charge No.12	61691
	ix) Census Charge No.14 and	39235
	x) Census Charge No.15	25409
	of District East Karachi	
	TOTAL	343,050

15. That, Census Charge No. 5,6,7,8,9,10,11,12,14 and 15 of Ferozabad Sub-Division, District east, Karachi are very Compact geographically and are connected together, which makes a very positive and convenient PS for public at large, thus facilitating the voters & more importantly electoral process in the respective constituencies.

16. That, at this juncture it is imperative to point-out here that above arrangement proposed by the Petitioners follows the criteria enunciated in the Elections Act and Rules of 2017. Needless to state that the proposed arrangement will not only save irrational distribution also make the constituency more compact without changing geographical status.

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PRAYER:

It is therefore most respectfully submitted that the Hon'ble Election Commission of Pakistan may be pleased to set aside the preliminary delimitation of constituencies of Provincial Assembly of Sindh in respect of PS-99, PS-100, PS-101, PS102, PS-103, PS-104, PS-105 and PS-106 in the interest of justice, accept the proposal submitted by the petitioners as a final list of constituencies in respect of PS-99, PS-100, PS-101, PS102, PS-103, PS-104, PS-105 and PS-106.

DATED: 03-04-2018



AUTHORIZED PERSON/

ATTORNEY OF THE PETITIONERS



ADVOCATE FOR THE PETITIONER

Annexures:

- Power of Attorney (Annexure A)
- Map of Proposed Constituencies by ECP (Annexure B)
- Map Proposed in the Representation (Annexure C)
- Copy of CNIC (Annexure D)
- Copy of Voter Extract (Annexure E)
- Vakalatnama (Annexure F)