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The Secretary
Election Commission of Pakistan
G-5/2, Constitution Avenue, Islamabad

**LEGAL OBJECTION AND PROPOSAL OVER THE PRELIMINARY LIST OF
PROVINCIAL ASSEMBLY CONSTITUENCIES OF DISTRICT JACOBABAD**

The undersigned Applicant submits as follows:-

1. The Applicant is resident of and registered voter of PS-1 Jacobabad-I (Old PS 14) (Hereafter: PS-1). Copy of the vote certificate is enclosed as Annex A. Being aggrieved by and dissatisfied with the new Delimitation of the Constituencies as announced by the Election Commission he prefers, inter alia, these objections.
2. There are three constituencies of provincial assembly in District Jacobabad i.e. PS-1, PS-2, and PS-3. The PS-1 in the draft list of constituencies consists on following areas:-

| Extent of constituency | Population |
|--|------------------|
| Municipal Committee Jacobabad of Taluka Jacobabad | 191,076 |
| Jacobabad STC excluding Tapedar Circle Janidero | 56,814 |
| Bahadurpur STC of Taluka Thul excluding following Tapedar Circles i) Balochabad and ii) Zangipur | 53,794 |
| The following Tapedar Circles of STC Thul of Taluka Thul i) Mubarakpur and ii) Tanwari | 18,557 16,330 |
| Total | 336,571 |

3. In the above draft list of constituencies two Tapedar Circles i.e. Balochabad having population of 12,122 and Zangipur having population of 18,538 are excluded and included in PS-3 but of almost same population two tapedar circles of STC Thul i.e. Mubarakpur having population of 18,557, and Tanwari having population of 16,330 are included in PS-1. It would apposite to

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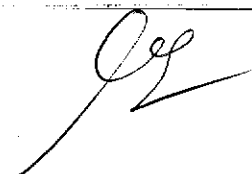
mention here that the tapered circles Balochabad and Zangipur have been part of PS-1 (PS-14) in all previous elections.

4. Before submitting objections, it would apposite to reproduce here the principles for delimitation of all Constituencies as laid down in sub-section (1) of the section 20 of the election Act 2017 for the guidance:-

"All Constituencies for general seats shall as far as practicable be delimited having regard to the distribution of 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.

5. Keeping in mind above principles of delimitations, the Delimitation of the Constituencies as proposed by the Election Commission in respect of PS-1 shows that the same is not in accordance with the provisions of section-20 i-e geographically not compact and for one part of the Constituencies as in the present, the Objector and other voters have to go through the area of other Constituencies.
6. The boundaries of the administrative units have been divided in such a way that not to provide facilities of communication and public convenience and in the present proposal, one part of the Constituency is situated separately from the other part of the Constituency.
7. While creating preliminary list of Constituencies, the geographically compact area and public convenience has not been considered due to which the general public will face hardship.
8. In the draft list of Constituencies, there has been gross violation of sub-section (1) of section 20 of the Election Act, 2017 by not keeping the existing boundaries of administrative units intact, which provides to keep the existing boundaries of administrative units intact as far


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| Total | 336,571 |

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6. The boundaries of the administrative units have been divided in such a way that not to provide facilities of communication and public convenience and in the present proposal, one part of the Constituency is situated separately from the other part of the Constituency.
7. While creating preliminary list of Constituencies, the geographically compact area and public convenience has not been considered due to which the general public will face hardship.
8. In the draft list of Constituencies, there has been gross violation of sub-section (1) of section 20 of the Election Act, 2017 by not keeping the existing boundaries of administrative units intact, which provides to keep the existing boundaries of administrative units intact as far

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as practicable. The boundaries of administrative units have been divided without applying the principals as laid down in the Election Act 2017. There is no need of dividing STC Bahadurpur by excluding two tapedar circles but threshold of population could meet through keeping the STC Bahadurpur intact.

9. The tapedar circles of STC Bahadurpur excluded from the PS-1 have joint population of 30,679 and joint population of two tapedar circles of STC Thul is 34,887. There is only population difference of around 4000, which compared to inconvenience in communication and hardship is intangible.

WITHOUT PREJUDICE to above legal objections, Constituency Wise proposals are as follows:-

PS-1 Jacobabad-I

| Extent of constituency | Population |
|---|------------|
| Municipal Committee Jacobabad of Taluka Jacobabad | 191,076 |
| Jacobabad STC excluding Tapedar Circle Janidero | 56,814 |
| Bahadurpur STC of Taluka Thul | 84,454 |
| Total | 332,344 |

PS-3 Jacobabad-III

| Extent of constituency | Population |
|--|------------|
| Taluka Garhikhero | 158,360 |
| The following area of Taluka Jacobabad | |
| i) Kherwah STC | 37,600 |
| ii) Ramzanpur STC | 64,603 |
| iii) Tapedar Circle of Janidero of Jacobabad STC | 32,420 |
| The following Tapedar Circles of STC Thul of Taluka Thul | |
| i) Mubarakpur and | 18,557 |
| ii) Tanwari | 16,330 |
| Total | 327,870 |

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In view of the above it is, inter alia, prayed that draft proposals/
Objections shall be considered and the Delimitation of the
Constituencies shall be re-checked and re-defined as per proposals
made by the Objector.

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