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A/03/04/2018

**Before the Secretary,
Election Commission of Pakistan,
Islamabad.**

PETITION OF OBJECTIONS

Respected Sir,

The petitioners, above-named, most respectfully and very humbly, submit as under:-

1. That the petitioners are the residents and voters of PS-103 and 104 and have gone through the fresh Delimitation of the Constituencies as announced by the Election Commission which according to Election Commission is described in annexed schedule.

2. That the Delimitation as marked by the Election Commission is not in accordance with the policy of Election Commission in respect of Geographical Compactness of a Constituency. Whatever Delimitation made by the Election Commission in respect of PS 103 and 104 is not correct in respect of Geographical Boundaries as in PS 104 as shown in the map requires reconsideration as because Charge # 211 has been included in it, whereas this charge shall be included in PS-103 which create compactness and

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geographical homogeneous and it also serve the people in respect of facilities and the public utilities.

3. That the above objection shows that the Election Commission has not properly demarcated the two P.S. as they are not geographically and naturally adjacent nor they are in accordance with the Section 20 of Law of Demarcation and by doing so the administrative units, division of population, facilities of transportation, hospitals and police station all may be disturbed, which resulted into disturbance in the general public, hence the request is made.

4. That the proposal to change the Charge No. 41211 which has a population of 33056, whereas if the said charge is shifted to PS-103 from PS-104 it shall not affect the ratio of population so both constituencies will be in accordance with the ratio of population and such demarcation creates harmony and brother-hood within the different population having different languages and the same is in accordance with the judgment of the Hon'ble Supreme Court of Pakistan, as reported in PLD 2011 Supreme Court 997 that the demarcation shall not be for

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the benefit of any political party but based on smooth population and multi-linguistic areas. The relevant portion of the judgment is reproduced as under:-

"Further observe that to avoid political polarization and to break the style of ethnic strife and turn war, boundaries of administrative units like police stations, revenue estates, etc., ought to be altered so that the members of different communities may live together in peace and harmony, instead of allowing various groups to claim that particular areas belong to them and declaring certain areas as NO GO areas under their fearful influence. Subsequent thereto, on similar considerations, in view of relevant laws, delimitation of different constituencies has also to be undertaken with the same object and purpose, particularly to make Karachi, which is the hub of economic and commercial activities and also the face of Pakistan, a peaceful city in the near future. The Election Commission of Pakistan may also initiate the process of its own in this behalf."

Proposal as made above is annexed as schedule.

5. That the majority of Urdu Speaking population is residing with the people of other languages but the proposed setup creating ethnic distribution.

So in order to create harmony among the different languages and maintaining geographical setup, undersigned is proposing the Delimitation of the above referred constituencies as per annexed schedule. Therefore, you are requested that by considering all the above facts, geographical conditions and law of

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demarcation, the demarcation of PS-103 & 104 may be amended in such a way, as proposed in the annexed schedule for which we shall be very grateful.

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