

To,

The Secretary,  
Election Commission of Pakistan  
Office of the Election Commission of Pakistan,  
Islamabad

HA/30/03/2018

**SUBJECT: REPRESENTATION / OBJECTIONS WITH REGARD TO  
PRELIMINARY LIST OF CONSTITUENCIES:**

Dear Sir,

The undersigned applicant respectfully submits as under:

1. That the undersigned is resident of Gulshan e Sikandarabad PS.113 (old PS-89) District West Karachi namely, I Akhtar Hussain Jadoon S/o Habib-ur-Rehman Jadoon residing at H.No.978, Block -I, Sikandarabad, Keamari, Saif-ur-Rehman Road, District West, Karachi.
2. That the applicant has been elected as a Member of Provincial Assembly twice i.e. 2002, 2007 elections.
3. That the applicant is aggrieved from preliminary lists of constituencies, which has been done without considering geographical and physical features.
4. That UC no.41 i.e. Baba Island, which comprises four wards has been excluded from PS-113 (PS 89 old) and Machar Colony has been included, which has been remained part of Mauripur Sub Division.

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5. That the existing boundaries of Baba Bhit use to touch with PS 89 (old).
6. That the people of Baba Bhit, Manora, Salehabad, Shams Pir, Younusabad, Kaka Village used to approach PS-113 (ex-PS 89) in every field having facilities of communication, health and Social Works. Whereas the Machar Colony is connected with Mauripur geographically, socially, and economically, therefore, inclusion of this area in PS-113 is not justified.
7. That there was no need to disturb the administrative unit i.e. Baba Island, where it has been traditionally and historical remained part of old PS 89, Karachi West, New PS-113 Karachi West II.
8. That the preliminary delimitation has been done in disregard to distribution of population in geographically compact areas.
9. That the facilities of communication, public convenience, and other cognate factors have not been considered to ensure homogeneity in the creation of constituencies.
10. As per sub-section (1) of Section 20 of Elections Act 2017, there is no need to disturb existing boundaries of administrative unit but this has been violated in Karachi West.
11. That the existing boundaries of administrative unit, i.e. Baba Island have been spirited in violation of Section 20 of Election Act 2017.

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12. That in the preliminary list of constituencies , there has been a gross violation of Sub-section (1) of Section 20 of the Elections Act 2017 by not keeping the existing boundaries of administrative unit intact as far as practicable. The administrative units have been divided conveniently without applying the principles as laid down in the Act 2017 and guidelines.
13. That if any election is conducted on the basis of provision causing mal-apportionment, debasement and disparity, it would be a violation of Articles 9, 17, 25 and 218 (3) of the Constitution and would be against the spirit of democracy and contrary to the provisions of Elections Act, 2017.
14. That by creating such irrational disparity in which it will be difficult to elect appropriate candidate.
15. While creating preliminary list of constituencies , the geographically compact areas and public convenience have not been considered, due to which the general public/voters will face the hardships.

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**WITHOUT PREJUDICE** to above legal objections, Constituency wise Proposals are as under:-

**PROPOSAL**

**Proposed PS-112 Karachi West I:-**

**(a) Entire Mauripur Sub Division:- 192,794**

**(b) The following areas of Harbour Sub Division are included**

**i. Machar Colony=70000**

**(c) The following census charges of Baldia Sub division:-**

**ii. Census Charge 13 (49330) and 15 (78,050)=127,380**

**@ Grand total:- 192,794+70000+127,380=390,174**

**Proposed PS-113 Karachi West II:-**

**(a) Entire Harbour Sub Division excluding Machar Colony:-297,436**

**(b) Including Census Charge No.3 (30,235) and Manora Cantonment area (5,874)=36,109**

**@ Grand total:- 297,436+30,235+5874=333,545.**

**Other constituencies of the district may remain same.**

**Copies of eight (8) proposed map of Provincial Assembly constituencies are attached herewith.**

I look forward to hear from you and hope that your good office will take necessary action in this regard.

Thanking you.

Profound regards,

( Akhtar Hussain Jadoon )  
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