

To,

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

P — 1  
AA 20/03/2018

**SUBJECT: - LEGAL OBJECTIONS AND PROPOSALS OVER THE PRELIMINARY LIST OF PROVINCIAL ASSEMBLY CONSTITUENCIES OF DISTRICT NAUSHERO FEROZE.**

That I, Ali Nawaz Nazir Ahmed S/O Muhammad Khan R/O Memon Muhalla, Moro, CNIC No. 41306-6960022-9, under Voter No.295/344060205, PS original 23 proposed 36 do hereby state as under: -

1. That I am a registered voter of proposed PS-36 and so also elected Chairman of Municipal Committee Moro.

2. That being an elected Chairman, I have some reservations regarding marked delimitations of proposed PS-36, as the Election Commission given me the opportunity for filing objections against proposed marked preliminary delimitations with reference to Notification No.F-8(3)/2018-Elec-I, dated 5-03-2018, whereby Honorable Commission will hear and decide the objections / representations under Sub-Section (4) of Section 21 of the Election Act, 2017 in connection with Preliminary list of National Assembly and Provincial Assembly Constituencies of Pakistan.

3. That the criteria for delimitation of National and Provincial Assembly Constituencies is laid down in Sub-Section (1) of Section 20 of Elections Act, 2017, is as under :-

**“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 administratively units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.”**

4. In view of above discussion, I hereby submit **LEGAL OBJECTIONS and PROPOSALS** for the preliminary proposed Provincial Assembly Constituencies namely PS-33, 34, 35 and 36, Naushero Feroze.

Cont....P/2

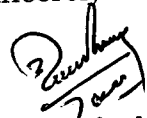
-: :- 1A

23/03/2018

### LEGAL OBJECTIONS

- i. As per Election Rules 2017 (Rule-10 Sub-Rule-5) the constituencies would be started as far as possible the delimitation of constituency of an Assembly shall start from north end of the District.
  - ii. The population within the limits of your given parameters.
  - iii. In the District Naushero Feroze, there was 05 constituencies of Provincial Assembly and 02 constituencies of National Assembly, since 1990, after creation of New district Naushero Feroze, out of Nawabshah, (Shaheed Benazirabad) after 28 years, 01 constituency reduced to 04 seats of Provincial Assembly, this make huge uncomfortably in whole District.
  - iv. As making new delimitations of constituency, the basic principals like as same type of population their historical route and belongings in also from North as clockwise not considered.
  - v. Naushero Feorze District have 05 Talukas and now we have 04 seats of Provincial Assembly and 02 seats of National Assembly so far as the administration boundaries are not admissible and I suggest it is best to maintain mostly STC (Supervisor Tapedar circle) as the main boundaries of constituencies.
  - vi. That the marked preliminary proposed constituencies made by the Election Commission of Pakistan for Naushero Feroze District, the Election Commission of Pakistan did not follow the Section-20 of the Election Act-2017, so also the Rules not been followed. Specially for making PS-35, the Election Commission over-ruled the Election Commission Act and also the rules mentioned in Para No.1 above. The proposed marked constituency PS-35 is a gross illegality on the part of Election Commission.
  - vii. The other grounds will be urged at the time of final arguments.
5. It is my humble request to the Election Commission that my proposed objections may kindly be considered and allow my proposed delimitations in the interest of justice and in the interest of public at large.

Yours most Sincerely and Faithfully,



**(Ali Nawaz Nazir Ahmed)**  
R/o Memon Muhalla, Moro  
District Naushehro Feroze  
E-mail: nazeer.ahmed001@yahoo.com