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**BEFORE THE ELECTION COMMISSION
OF PAKISTAN ISLAMABAD**

20, The Secretary Election Commission

Representation No. of 2018

Zafar Ali
S/O Muhammad Sadiq Ujan,
Muslim, Adult,
R/O Village Muhammad Sadiq Ujan,
P.O Darbelo,
District Naushahro Feroze,
Sindh.....PETITIONER

V E R S U S

The Delimitation Committee,
Province of Sindh.....RESPONDANT

**Representation under Rule-12 of the Election
Rules 2017, against Preliminary Proposal of
Delimitation to conjoin (T.C) Tapedar Circle
"Mad Alim" with PS-35, which is geographically
compact with PS-34 with prescribed ratio of
population in District Naushahro Feroze,
Province of Sindh.**

The Petitioner above named respectfully submits as
under:

1. That the Petitioner is a law abiding and
respectable citizen of Pakistan, residing at address
mentioned above and is voter in constituency PS-35.

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2. That the Delimitation Committee (Respondent) has been constituted under rule 9 of Election rules of 2017, for the purpose to prepare draft proposal for Delimitation of Constituency of National Assembly and Provincial Assembly of respective Province.
3. That the respondent under rule 10 of Election rules of 2017 is responsible to collect all necessary data from relevant competent authorities for preparation of draft proposal for Delimitation of Constituencies according to principles of Delimitation as laid down in section 20 of Election Act 2017, procedure given in the Election rules and guideline provided by the Commission.
4. That the respondent proceeded with the plan of Delimiting for both constituencies viz. PS-34 and PS-35 in District Naushahro Feroze without considering the principles and norms as envisaged under section 20 of Election Act 2017.
5. That the population of Provincial Assembly Constituencies of District Naushahro Feroze as announced officially are as follows :-
 - (a) PS- 34 _____ 396,214-
 - (b) PS- 35 _____ 429,980-
7. That the respondent grossly erred to Conjoin the area of (Mad Alim) with PS-35 which is geographically compact area with administrative part of Tahsil Bhiria

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but now added to Tahsil Naushahro Feroze without considering norms described in section 20 of Election Act 2017.

8. That (T.C) Tapedar Circle "Mad Alim" is existing part of Tahsil Bhiria with its administrative units for convenience and public communication, hence being aggrieved with said Delimitation by Respondent.

The Petitioner filed instant Representation on following grounds:-

GROUND S

1. That the process of Delimitation of Constituency for an Election is one of the important steps to organize and conduct Election with Convenience of voters.

2. That the preliminary proposal of Delimitation in District Naushahro Feroze for National Assembly has been issued while ignoring the prescribe norms in section 20 of the Election Act 2017.

3. It is crystal clear from perusal of published map that, (T.C) Tapedar Circle "Mad Alim" is geographically compact with Tahsil Bhiria but it has been Conjoined with Tahsil Naushahro Feroze which is about 14 Kms away from Tapedar Circle "Mad Alim"

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this fact "Geographically Compact" is ignored by the respondent.

4. That (T.C) Tapedar Circle Mad Alim is existing part of Tahsil Bhiria with its administrative unit for communication facilities of public, same facts has also been ignored by the respondent.

5. That (T.C) Tapedar Circle Mad Alim being existing part of Tahsil Bhiria with all public convenience and with all cognate factors to ensure homogeneity to remain in PS-34 rather than to unjustifiably conjoin with PS-35.

6. The respondent ignored the fact of facilities of communication, public convenience physical features of area, existing boundaries of administrative units and geographically compact area with constituency PS-34 hence the petitioner filed the instant Representation with following proposals.

PROPOSAL

Population of PS-34 Which is
at present is 396,214 and if (TC)
Tapedar Circle "Mad Alim"
population: 27,659 added to
will be as $396,214 + 27,569 = 423,873$.

Population of PS-35 which is at present
429,980 and if Tapedar Circle "Mad Alim"
population 27,659 is subtracted
from 429,980 - 27,659 will be 402,321.

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Both constituencies i.e. PS-34 population will be 423,873 and
population PS- 35 will be 402,321 which will be according to
the guidelines announced by the Election Commission of
Pakistan and within ratio of "Quota of per seat"

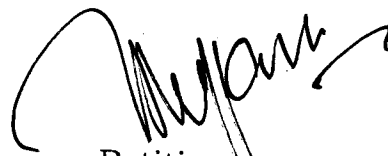
That the said proposal of petitioner carries great
public convenience and facilities of communication
with existing administrative units of Tahsil Bhiria,
hence the petitioner prays as under:-

PRAYER

That the Honorable Election Commission of
Pakistan may kindly be pleased to set aside the
preliminary Delimitation of said constituencies for
Provincial Assembly in District Naushahro Feroze
Province of Sindh and accept the proposal of Petitioner
for final list of constitutes.

(Required documents are attached herewith)

Dated: 31 -03-2018


Petitioner