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**BEFORE HON'BLE SECRETARY, ELECTION COMMISSION  
OF PAKISTAN, G-5/2, CONSTITUTIONAL AVENUE,  
ISLAMABAD.**

Application No. of 2018

**LEGAL OBJECTIONS OVER THE PRELIMINARY LIST OF PROVINCIAL ASSEMBLY  
CONSTITUENCIES OF DISTRICT THARPARKAR, SINDH PROVINCE AND PROPOSALS  
FOR PROVINCIAL ASSEMBLIES CONSTITUENCIES OF DISTRICT THARPARKAR.**

Respectfully Sheweth,

**The undersigned, applicant, respectfully submits as under:**

1. With reference to Notification No. F-8(3)2018-Elec-I, dated 5<sup>th</sup> March, 2018, whereby Hon'ble Commission announced that it would hear and decide the objections/ representations, filed under Sub-section (4) of Section 21 of the Election Act, 2017 in connection with Preliminary list of National and Provincial Assembly Constituencies of Pakistan.
2. That, the petitioner/applicant, is voter of above District and being social worker of the district, observes that the constituencies of Provincial Assemblies especially PS-56 and PS-57 affect the general public at large as existing boundaries of administrative units have not been taken into consideration during formation of constituencies. Not only this, but revenue boundaries have also been breached.
3. That, the criteria for delimitation of National and Provincial Assembly Constituencies is laid down in sub-section (1) of section 20 of the Election 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 area, 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."

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4. That, in the view of above discussion, I hereby submit my LEGAL OBJECTIONS and PROPOSALS to preliminary list of Provincial Assembly Constituencies namely PS-54, PS-55, PS-56 and PS -57.

**LEGAL OBJECTIONS**

- A. That, the Preliminary list of Provincial Assembly Constituencies of District Tharparkar have been made in violation of Sub-section (1) of section 20 of the Election Act, 2017 as the present constituencies are objectionable on even only one ground that by merging two Taluka Administrative units one PS constituency can be formed and by two PS constituencies, One National Assembly Constituency can be formed but in existing formation of constituencies, the revenue boundaries of Taluka Administrative units have been breached and Provincial Assembly constituencies have been formed comprising those on the different areas of three Taluka administrative units which is sheer violation of Scheme provided in sub-section (1) of section 20 of the Election Act, 2017 and such formation is also not feasible and cannot be run and monitored properly and easily and transparency also cannot be expected.
- B. That, so far the area of Provincial Constituency of PS-56 is concerned, the formation of this constituency appears contrary to scheme laid down in the Election Act, 2017 as the areas of Taluka Mithi, Taluka Islamkot and Taluka Chacharo are also not geographically matching with each other. The people of Islamkot, Taluka Mithi and Taluka Chacharo are not connected with each other socially and they have also not like-mindedness with each other.
- C. That, in the preliminary list of Provincial Constituencies, in PS-57, the areas of three taluka administrative units i.e. Diplo, Kaloi and Mithi, have been merged in one constituency which is sheer violation of guidelines prescribed in Election Act, 2017. As PS-57 has been comprised on parts of three administrative units which will be difficult for even heads of administrative units. And geographically the areas of Taluka Diplo, Taluka Kaloi and Taluka Mithi are mismatched with each other. The indigenous population of these three Talukas has also no any homogeneity with each other.

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- D. That, in the preliminary list of constituencies, there has been gross violation of sub—section (1) of section 20 of the Election Act, 2017 by not maintaining revenue boundaries. The boundaries of administrative units have been divided conveniently without applying the principles as laid down in the Act, 2017 and guidelines.
- E. While creating preliminary list of constituencies, the geographically compact area and public convenience has not been considered, due to which the general public will cause hardship.
- F. That, the Constituencies of PS-54 and PS-55 have also been formed in violation of section 20(1) of the Election Act, 2017, hence proposal for reconstitution of said constituencies are also offered for kind consideration.

**WITHOUT PREJUDICE** to above legal objections, constituency-wise proposals submitted as under:

**PROPOSAL FOR PS-56**

- 1) That, the most of parts of Taluka Islamkot and Taluka Diplo have already remained in one and same constituency, hence the inhabitants of these areas are socially and culturally connected with each other and geographically the boundaries / areas of these two administrative units are also adjacent to each other. The population of Taluka Islamkot- 244662 and Population of Taluka Diplo – 147978 which total makes – 3,92,640/- as per preliminary list of Election Commission of Pakistan. Hence, it is proposed that the Constituency of PS-56 may please be made consisting upon the complete areas of Taluka Islamkot and Taluka Diplo as these are Taluka Administrative units and if they are merged in one constituency, there is likelihood that said constituency will easily be monitored, run administratively properly and transparency can be ensured.

<b>Constituency PS-56-</b>	<b>Taluka Islamkot</b>	<b>:</b>	<b>244662</b>
	<b>Taluka Diplo</b>	<b>:</b>	<b>147978</b>

<b>Total Population for constituency of PS-56</b>	<b>:</b>	<b>392640.</b>
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**PROPOSAL FOR PS-57**

2) That, the boundaries of Taluka Mithi, Taluka Kaloi, STC Kantio and TC Haji Jalal Sangrasi are connected with each other. Geographically, these areas are interconnected and people of these areas have like-mindedness. The population of Taluka Mithi-219071, Taluka Kaloi- 118030, STC Kantio- 535309 and TC Haji Jalal Sangrasi- 27432, which total makes total population for PS-57 constituency = 418072, as per preliminary list of Election Commission of Pakistan. Hence, it is proposed that the Constituency of PS-57 may please be reconstituted, consisting upon the complete areas of Taluka Mithi, Taluka Kaloi, STC Kantio and TC Haji Jalal Sangrasi as two of them are Taluka Administrative units and other geographically connected with each other and if they are merged in one constituency, these will easily be monitored, controlled well administratively and transparency in election process will easily be achieved.

<b>Constituency PS-57-</b>	<b>Taluka Mithi</b>	<b>:</b>	<b>219071</b>
	<b>Taluka Kaloi</b>	<b>:</b>	<b>118030</b>
	<b>STC Kantio Tal. Chachro</b>	<b>:</b>	<b>53539</b>
	<b>TC Haji Jalal Sangrasi Tal. Chachro</b>	<b>:</b>	<b>27432</b>
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	<b>Total Population for constituency of PS-57 :</b>		<b>418072</b>
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**PROPOSAL FOR FOR PS-54**

3) That, the boundaries of Taluka Dahli, Charnor TC, Chachro TC, Town Chachro and Mithirio Charan TC are connected with each other, geographically these area interconnected and people of these areas are socially connected. The total population of these areas total makes total Number as 422775, as per preliminary list of Election Commission of Pakistan. Hence it is proposed that the Constituency of PS-54 may please be made consisting upon the complete areas of Taluka Dahli, Charnor TC, Chachro TC, Town Chachro and Mithirio Charan TC as they fall in only two Taluka Administrative units and as areas of two

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Talukas are adjacent with each other. If they are merged in one constituency, it will be in larger interest of public.

<b>Constituency PS-54-</b>	<b>Taluka Dahli</b>	<b>:</b>	<b>308487</b>
<b>Taluka Chacharo</b>	<b>Charnor TC</b>	<b>:</b>	<b>33118</b>
	<b>Chacharo TC</b>	<b>:</b>	<b>18853</b>
	<b>Chachro Town</b>	<b>:</b>	<b>23336</b>
	<b>Mithrio Charan TC</b>	<b>:</b>	<b>38981</b>
<b>Total Polpulation</b>			<b>422775</b>

#### PROPOSAL FOR PS-55

- 4) That, the boundaries Taluka Nangar, STC Saringhiar, Tardos TC, and Rajoro TC are connected with each other, geographically these area interconnected and people of these area have same very nearness and are likeminded. The population these areas total makes 416174, as per preliminary list of Election Commission of Pakistan. Hence it is proposed that the Constituency of PS-55 may please be made consisting upon the complete areas of Taluka Nangar, STC Saringhiar, Tardos TC, and Rajoro TC as these are Taluka Administrative units and others are very close to them and if they are merged in one constituency, these will easily be controlled and run administratively.

<b>Constituency PS-55-</b>	<b>Taluka Nangar</b>	<b>:</b>	<b>260170</b>
<b>Tal. Chacharo</b>	<b>STC Saringhiar</b>	<b>:</b>	<b>79605</b>
	<b>Tardos TC</b>	<b>:</b>	<b>48138</b>
	<b>Rajoro</b>	<b>:</b>	<b>28261</b>
	<b>Total Population</b>		

- 5) That, above proposals meet criteria enshrined in sub-section (1) of Section 20 of the Election Act 2017.
- 6) In the view of above discussion, it is prayed in the interest of general public and voters of District Tharparkar that your majesty may graciously be pleased to accept above proposals for constituencies of District Tharparkar as these proposals are made in conformity of sub-section (1) of section-20 of the Election Act 2017.
- 7) Copies of required documents are accompanying in octuplicate.



Islamabad.

Dated: 30.03.2018

(OMPARKASH Son of MOHAN LAL)

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