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**BEFORE HON'BLE SECRETARY, ELECTION 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 5th 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 PS-54, PS-55, PS-56 and PS-57 affect the general public at large as physical features, existing boundaries of administrative units, geographically compact areas, facilities of communication and public convenience have not been taken into consideration during formation of constituencies.
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

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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 ground that physical features, existing boundaries of administrative units, geographically compact areas, facilities of communication and public convenience have not been considered properly due to which areas included into constituencies do not match with each other hence public will face a lot of difficulties due to divergence of areas. This 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, in the preliminary list of Provincial Constituencies, PS-54, PS-55, PS-56 and PS-57 have been constituted in such a way which causes a lot problems to voters of area as in new constituencies the public interest has not been valued.
- C. 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.
- D. 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.

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

PROPOSAL FOR PS-54

1) That, the boundaries of Taluka Dahli, Charnor TC, Chachro TC, Town Chachro and Mithirio Charan TC are connected with each other, geographically these areas are interconnected and people of these areas are socially connected. The total population of these areas total makes 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 Talukas are adjacent with each other. If they are merged in one constituency, it will be in larger interest of public.

Constituency PS-54-	Taluka Chacharo {	Taluka Dahli	:	308487
		Charnor TC	:	33118
		Chacharo TC	:	18853
		Chachro Town	:	23336
		Mithirio Charan TC	:	38981
Total Polpulation			:	422775

PROPOSAL FOR PS-55

2) That, the boundaries Taluka Nangar, STC Saringhiar, Tardos TC, and Rajoro TC are connected with each other, geographically these areas are interconnected and people of these area have likemindedness. 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 each other and if they are merged in one constituency, these will easily be controlled and run administratively.

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Constituency PS-55-	Taluka Nangar	:	260170
Tal. Chacharo	STC Saringhiar	:	79605
	Tardos TC	:	48138
	Rajoro	:	28261
	Total Population	:	416174

PROPOSAL FOR PS-56

3) That, most of areas of Taluka Islamkot, TC Verhar, TC Kounral, TC Diplo, Diplo Town, and Mithirio Bhatti STC, Chelhar STC Chelhar Town, and Haji Jalal Sangrasi are adjacent with each other and the inhabitants of these areas are socially and culturally connected and geographically the boundaries of above revenue areas are also allied. If these all areas are merged in one constituency, the total Number will be made out as 411812.

Constituency PS-56-	Taluka Islamkot	:	244662
	Verhar TC, Tal. Diplo	:	11492
	Kounral TC, Tal. Diplo	:	18833
	Diplo TC, Tal. Diplo	:	18792
	Diplo Town, Tal. Diplo	:	12719
	Mithirrio Bahtti STC, Tal. Mithi	:	28823
	Chelhar STC, Tal. Mithi	:	30318
	Chelhar Town, Tal. Mithi	:	11135
	Haji Jalal Uddin Sangrasi Tal. Chachro	:	27432
	Total Population for constituency of PS-56	:	411812.

PROPOSAL FOR PS-57

4) That, the boundaries of Taluka Kaloi, Mithi STC, Joruo STC, Mithi MC, Mohrano STC, Baliyari STC, Sobhiyar TC, and Kantio STC are connected with each other. Geographically, these areas are interconnected and people of these areas have like-mindedness. The population of these areas make total number = 3,98,900. The people of

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these areas have convenience and communication with each other hence they may be merged in one constituency.

Constituency PS-57-	STC Balihyari Tal. Diplo :	51080
	Taluka Kaloi :	118030
	Mohrano STC Tal. Mithi :	29767
	Joruo STC, Tal. Mithi :	34521
	Kantio STC, Tal. Chachro :	53539
	Mithi STC, Tal. Mithi :	37434
	Mithi MC, Tal. Mithi :	47073
	Sobhiyar TC, Tal. Diplo :	27456

Total Population for constituency of PS-57 : 398900

- 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: 20.03.2018

Add: Village Tooh Tal. ~~Islamabad~~ Dist. Tharparkar.

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