

To
The honorable secretary,
Election Commission of Pakistan,
Islamabad

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30/03/2018
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Subject: Memorandum of representation against the delimitation of constituencies of district Malir Karachi

Respected Sir

I, Riasset Khan S/o Mir Dad the applicant/voter of constituencies most respectfully bring following objections/memorandum of representation against the delimitation made by the authorities and also submitted the proposed map of delimitation of the entire district for your kind consideration.

Objection of the constituencies of PS 90 and PS 91 of District Malir Karachi

1. PS 90 of district Malir Karachi of total population 408294
2. PS 91 of district Malir Karachi of total population 407431
3. Charge #5 of the subdivision of Ibrahim Hyderi consisting population 64690 of district Malir has been unnaturally included to PS 90. It's a population jump. Therefore, the continuation of the population has been disturbed.
4. Ward 1, 2 and 3 of UC1 DMC Malir has been included to PS 91 and the remaining part of the said UC is included to PS 89. All the municipal services of the said UC may be affected with the decision.
5. The geographic and compactness of both constituencies have affected. The authorities has not taken into consideration. The following section of the law before the delimitation of the constituency PS 89, PS 90 and PS 91.

Section 20 of the election act 2017, provides that (1) all constituencies for general seats shall, as far as practicable, be delimited have in regards to the distribution of the population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convince and other cognate factors ensure homogeneity in the creation of constituency.

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(2) for the purpose of delimiting constituency of the general seat of the national assembly of the tribal areas to two or more separate areas may be grouped into one constituency.

(3) as far as possible, variation in population of constituency an assembly are a local government shall not ordinarily exceeded ten percent.

(4) if the limit of ten percent of under sub- section 3 is exceeded in exceptional case, the commission shall record reasons thereof in the delimitation order.

6. Charge #5 of PS 90 and Charge #6 of PS 91 is geographically compact and there is no such proper boundary in the two charges. And it may be consider including in one constituency. Charge #5 and #6 of sub-division Ibrahim Hyderi was a part of single UC and now it is divided into two UCs. Ward 4 of UC 4 is a part of charge#5 and all the civic facilities of the both UCs and charges are same.
7. Boundaries of the two parts of the NA 237 are no geographically not connected. There is no territorial connection between the two separate parts.
8. Even on the basis of given propose amendment not only save irrational distribution but also shall make constituency compact without changing their geographical status.
9. That this will meet with ends of justice if your honor may be pleased to consider the representation objection and allow the proposal made by applicant.



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