



Ref:

Date-19.04.2026

NOTICE DEMANDING JUSTICE

To

1. Bangladesh, represented by the Secretary
Ministry of Local Government, Rural Development & Co-operatives
Local Government Division
Bangladesh Secretariat, Dhaka-1000.
2. Secretary
Election Commission Secretariat
Election Building, Plot No. E-14/Z, Agargaon, Dhaka-1207.
3. Additional Secretary (Pourashava Wing)
Local Government Division
Ministry of Local Government, Rural Development & Co-operatives,
Bangladesh Secretariat, Dhaka-1000.
4. Deputy Commissioner
Office of the Deputy Commissioner
Dhaka-1000.
5. Upazila Nirbahi Officer (UNO)
Dohar Upazila, Dhaka-1330.
6. Upazila Election Officer
Dohar Upazila, Dhaka-1330.
7. Administrator/Mayor
Dohar Pourashava Office
P.S - Dohar, Dhaka-1330.

..... **Notice Receivers**

Abdullah Abu Sayeed
Advocate
Supreme Court of Bangladesh
Of village Islampur, Ward No. 3
Dohar Pourashava, P.O - Joypara, Dhaka-1330.

.....**Notice Sender**



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Subject: To rectify/implement the territorial boundaries of Ward No. 03 and Ward No. 09 of Dohar Pourashava in accordance with the actual area of the concerned Mouza as mandated by the Bangladesh Gazette (Extraordinary) dated December 14, 2021.

Dear Sirs,

Being legally injured by the arbitrary and irregular procedures adopted by your office, I, Abdullah Abu Sayeed, Advocate, Supreme Court of Bangladesh hereby issue this Notice Demanding Justice stating as follows:

1. That, I am a permanent citizen as well as a voter under Ward No. 3 of the Dohar Pourashava and that I am also an advocate of Supreme Court of Bangladesh. Thus, I have a legal right and be entitled to serve you this demand justice notice to ensure the rule of law.
2. That, Dohar Pourashava has been established in 2000 to serve the administrative and civic needs of the local residents and that the government re-constituted the wards of the pourashava by the Bangladesh Gazette (Extraordinary) dated December 14, 2021.
3. That, in accordance with the aforesaid Gazette notification, Ward No. 03 of Dohar Pourashava has been formally re-constituted to encompass the following territories:
 - Some portion of Joypara-57 Mouza and
 - some portion of Khalpar-58 Mouza including **R.S Dag Nos. 893 to 1213.**
4. That, in accordance with the aforementioned Gazette notification, Ward No. 09 of Dohar Pourashava has been formally re-constituted to encompass the following territories:
 - Entire Laskar Kanda-59 Mouza;
 - Entire Sheet Nos. 01 & 02 under Usufpur-60 Mouza; and
 - R.S. Dag Nos. 01 to 57 under Ghata-61 Mouza.



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5. That, despite the clear mandate of the Bangladesh Gazette (Extraordinary) dated December 14, 2021, the then Upazila Nirbahi Officer (UNO) and Upazila Election Officer of Dohar acted in a most arbitrary and illegal manner. They unilaterally and unlawfully included R.S. Dag Nos. 893 to 1213 under Khalpar-58 Mouza into Ward No. 09.
6. That, it is clearly specified in the aforementioned Gazette, Ward No. 09 has been constituted exclusively with the territories of Laskar Kanda-59, Usufpur-60, and specific Dag Nos. of Ghata-61. The Gazette contains no mandate for the inclusion of any territory under Khalpar-58 Mouza into Ward No. 09, rather its inclusion is an act performed without any legal authority (*ultra vires*). The inclusion of R.S. Dag Nos. 893 to 1213 into Ward No. 09 is, therefore, a complete departure from the statutory territorial limits defined by the Government. And that by forcibly grafting R.S. Dag Nos. 893 to 1213 onto this Ward No.9, the concerned authorities have created a territorial entity that does not legally exist which occurred a gross violation of the statutory boundaries fixed by the Gazette dated 14.12.2021.
7. That, Consequently, the last pourashava election held in 2022 was conducted on the basis of this flawed and illegal territorial jurisdiction. By conducting the last pourashava election based on these unauthorized boundaries, the people of these wards are currently enduring unbearable problems due to the chaotic and illegal demarcation of boundaries. By ignoring the Gazette's mandate, your office has blocked these residents from accessing their rightful civic amenities and services and leaving them without clear administrative recourse or proper representation.
8. That by deviating from the specific Mouza and Dag numbers prescribed in the Gazette, the concerned authorities have acted *ultra vires* (beyond their legal jurisdiction). Such arbitrary re-demarcation, which contradicts the government gazette notification, is not only a procedural irregularity but a



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substantive violation of the Local Government (Pourashava) Act, 2009. That as a result of this illegal shifting of territories, the residents of R.S. Dag Nos. 893 to 1213 under Khalpar-58 Mouza are being deprived of their fundamental rights to be represented within their lawful ward (Ward No. 03), as they have illegally been registered as voters in the Ward No. 09.

In the above circumstances, you are, hereby, requested to take immediate necessary steps to rectify/implement the territorial boundaries of Ward No. 03 and Ward No. 09 of Dohar Pourashava in accordance with the actual area of the concerned Mouza as mandated by the Bangladesh Gazette (Extraordinary) dated December 14, 2021 within 7 (seven) days from the date of receipt of this notice. Otherwise, it shall be deemed that justice has been denied and, in that case, I have no other alternative but to seek legal redress by filing a Writ Petition before the Hon'ble High Court Division of the Supreme Court of Bangladesh under Article 102 of the Constitution and thus you will be held responsible for all costs and consequences thereof.

A copy of this notice is kept at my office for further reference.

Sincerely Yours

(Abdullah Abu Sayeed)

Advocate

Supreme court of Bangladesh

ABDULLAH ABU SAYEED
Advocate
Appellate Division
Supreme Court of Bangladesh
Cell: 01979-800008