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Dated: 03-04-2018

To,

The Honorable Secretary,
Election Commission of Pakistan,
Islamabad.

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03-04-18

**SUBJECT:- MEMORANDUM OF REPRESENTATION AGAINST THE
DELIMITATION OF THE CONSTITUENCIES OF NA-206
SUKKUR-I & NA-207 SUKKUR-II DISTRICT SUKKUR.**

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Respect Sir,

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With the applicants/voters of our constituencies, most humbly and respectfully bring following objections / memorandum of representations against the delimitation made by the Authorities and also submit the proposed maps / delimitation of the entire District for your kind consideration.

APPLICANT / VOTER

Yasir Ali
S/O. Abdul Razzak Lashari
CNIC No. 45504-4620746-5
R/O. Queen's Road Sukkur
Vote No. 383
Block Code: 322020204

OBJECTIONS TO THE CONSTITUENCIES OF NA-207 SUKKUR-II OF
DISTRICT SUKKUR

1. NA-206 Sukkur-I of District Sukkur consisting of a total population 7,31,411
2. NA-207 Sukkur-II of District Sukkur consisting of a total population 7,56,492

It is pertinent to mention here that in the General Election, 2013 the above constituency was known as NA-198 & NA-199 respectively.

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3. That, the TC Sunder Belo, Panhwari Jagir, Nauraja and Hingoro have been illegally included in NA-207 of District Sukkur.

4. That, Geographic and compactness of both the Constituencies have badly affected. The authorities have not taken into consideration the following section of the law, before delimiting the constituency of NA-206 & NA-207 such as;

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

(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.

(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinary exceed ten percent.

(4) If the limit of ten percent under sub-section(2) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.

5. That, above said TCs Sunder Belo, Panhwari Jageer, Nauraja and Hingoro have been illegally included in NA-207 Sukkur-II of District Sukkur. it is pertinent to mention here that aforesaid TCs have never remained in part and parcel of NA-198 & NA-207.

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6. That, aforesaid TCs attached with NA-207 neither adjacent the constituency of 207 nor belong to said constituency because the aforesaid TCs have ever remained the part and parcel of NA. 206 / 199.

7. That, due to illegal and unlawful acts of the ECP the innocent peoples of aforesaid TCs will highly prejudiced for their franchise rights, because neither geographically attached with NA-207 nor take any benefit of this delimitation, because the said TCs belongs to Rural area and faraway from the constituency of N.A.207 Sukkur-II, as the aforesaid TCs are adjacent to NA-206 Sukkur-I.

That, applicants propose the following amendment in delimitation of the constituencies of NA-207 of District Sukkur.

DELIMITATION BY ECP AS PER FORM-5

NO & NAME OF CONSTITUENCY	EXTEND OF CONSTITUENCY	POPULATION
NA- 206 Sukkur-I	a) Taluka Pano Akil excluding the following Tapedar Circles of Pano Akil STC	365,789
	i) Sunder Belo ii) Panhwari Jageer iii) Nauraja iv) Hingoro and	
	b) Taluka Rohri excluding the following areas:- i) Municipal Committee Rohri ii) Tapedar Circle Rohri of Rohri STC and c) Taluka Salehpat of District Sukkur	236,003
	Total	731,411

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NA-207 Sukkur-II	a) New Sukkur Taluka	319,768
	b) Sukkur City Taluka	231,589
	c) Municipal Committee Rohri of Taluka Rohri	69,920
	d) The following Tapedar Circles of STC Pano Akil of Taluka Pano Akil	
	i) Sunder Belo	10,061
	ii) Panhwari Jagir	12,776
	iii) Nauraja	14,195
	iv) Hingoro	33,002
	Tapedar Circle Rohri of Rohri STC of Taluka Rohri of District Sukkur	65,181
	Total	

GROUNDS

1. That the instant delimitation ignores the established principle that the important of delimitation is to divide the geographic area into territorial constituency fairly, no party or candidate may legitimate have grievance that there has been "Gerrymandering" or constituencies in favour or against the any particular party or candidate. The instant delimitation clearly being done to benefit one political party thus clearly amounts to worst form of "Gerrymandering".

2. That, instant delimitation of NA-207 Sukkur-II would ignore the established principle that the delimitation is not a mere drawing of boundaries with stroke of pen. It is judicious exercise of delineating electoral areas, vigilantly warding against any possible fair of vote dilution, disenfranchisement of corrupt practice

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whereas in the instant of the establish principle have been tempered upon and none of consideration is required delimitation has been heeded to.

3. That, instant delimitation of National Assembly No.206 of Sukkur-I, if not intervened, would lead unfair skewed results , tarnishing electoral integrity, making a mockery of election and turning the "constitutional principle" political justice on its have.

4. That, the instant delimitation of N.A 206 would seriously violate the right to life and liberty of the applicants and voters NA-207 Sukkur-II, as enshrined U/A 9 of Constitution of Islamic Republic of Pakistan, life of the citizen in representative democracy cannot be envisage without its political dimensions, the ability of participate in the political life of the nation, the freedom to exercise to political choice, the right to choose a political leader to elect the government of his / her choice.

5. That, the instant meditation of NA-207 Sukkur-II violate the dignity of applicants and voters of said District as enshrined U/A 14 of Constitution of Islamic Republic of Pakistan, since, human dignity includes the right to demand a political and democratic structure of governance based on electoral process conducted on the equality and transparency.

6. That, instant delimitation of NA-207 Sukkur-II is against the whole aim and purpose of process of delimitation. The delimitation

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always conduct to ensure, just and proportional representation of the people in the election.

7. That, the instant delimitation of NA-207 neglected of the law and rules and against the will of objection of general public is repressive, autocratic and tyrannical and in utter dis-guard to the law, precedent of the Higher Courts and principle of natural justice.

8. That, the applicants beg leave to add to amend and / or plead additional ground at the time of hearing of this representation.

9. That, the applicants submit ted that the constituency of NA-207 Sukkur-II be carried out in the manner describe in below mentioned table to bring the same inconformity with Section:20 Act of Election.

PROPOSED DELIMIATION BY APPLICANTS

NO & NAME OF CONSTITUENCY	EXTEND OF CONSTITUENCY	POPULATION
NA- 206 Sukkur-I	a) Taluka Pano Akil	435,823
	b) Taluka Rohri excluding the following areas:-	163,047
	i) Municipal Committee Rohri	
	ii) Tapedar Circle Rohri of Rohri STC excluding the following Tc,s	
	1) TC Khadheri	
	2) TC Panhwari	
	3) TC Patni	
	c) Taluka Salehpat of District Sukkur.	129,619
	Total	728,489

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NA- 207 Sukkur-II	New Sukkur Taluka	319,768
	Sukkur City Taluka	231589
	Municipal Committee Rohri	69920
	TC Khadheri	14449
	TC Panhwari	25396
	TC Patni	33111
	TC Rohri	65181
Total		759,414

PRAYER

It is therefore, prayed that in consideration of above grounds mentioned above the representation of the applicants and the delimitation of District Sukkur be carried out as per proposals given hereinabove.

Yasir Ali

Yasir Ali
S/O. Abdul Razzak Lashari
CNIC No. 45504-4620746-5
R/O. H.No. 34, Muhallah Officers
Colony, Adam Shah Road Sukkur
Mobile No. 03155618775

VERIFICATION

Verified on oath at Islamabad on this 3rd day of April
2018 that the contents of para 1 to 9 of this
affidavit are true and correct to the best of
my knowledge and belief and nothing has been
concealed from the court.

This affidavit was sworn before me on the 20th day of APR 2018 by the deponent who is personally known to me. I have read and explained to deponent who has understood and attested the same.
Serial No

Yasir Ali

Applicant

Irshad-ul-Haq
Advocate High Court
Oath Commissioner
Islamabad