

To,

DATED 02.04.2018

The Honourable Secretary,
Election Commission of Pakistan,
Islamabad.



Subject: **MEMORANDUM OF REPRESENTATION AGAINST THE
DELIMITATION OF THE CONSTITUENCIES OF DISTRICT
SUKKUR**

Respected Sir,

We 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:

Applicants / Voters

1. Khalid Hussain S/o Allah Wasayo Bhutto CNIC No.45502-7122320-5 Village Sukhiyo Bhutto PO Rohri Taluka Rohri District Sukkur Block Code:323010101 Silsla No.20.
2. Humair Ahmed S/o Khalid Hussain Bhutto CNIC No.45502-9787595-1 Village Bagahi Bhutto Saeedabad PO Rohri Taluka Rohri District Sukkur Block Code:323010102 Silsla No.55.
3. Altaf Hussain S/o Kareem Bux Bhutto CNIC No.45502-7538659-3 Village Bagahi Bhutto Saeedabad PO Rohri Taluka Rohri District Sukkur Block Code:323010102 Silsla No.27.
4. Bashir Khan S/o Sono Khan CNIC No.45502-0226584-5 Village Dib PO Rohri Taluka Rohri District Sukkur Block Code:323020707 Silsla No.433.
5. Shabir Ahmed S/o Allah Jurio CNIC No.45502-1141237-7 Dool Mohallah Bhitai Colony Miani Bagat PO Rohri Taluka Rohri District Sukkur Block Code:323010111 Silsla No.530.
6. Ghulam Shabir S/o Muhammad Sulaiman Bhutto CNIC No.45502-6080688-1 Village Muhammad Laquie PO Rohri miani Baghat Taluka Rohri District Sukkur Block Code:323010111 Silsla No.317.
7. Ghulam Fareed S/o Dhani Bux CNIC No.45502-1091913-5 Village Haji Buriro PO Rohri Taluka Rohri District Sukkur Block Code:323010114 Silsla No.981.
8. Ghulam Abbas S/o Abdul Rehman CNIC No.45502-7409010-7 Village Mewo Faiqr Mari PO Rohri Mando Dero Taluka Rohri District Sukkur Block Code:323010107 Silsla No.348.
9. Shoukat Ali S/o Muhammad Hassan Jagirani CNIC No.45502-3872383-1 Village Patho Bah PO AQZM Taluka Rohri District Sukkur Block Code:323010111 Silsla No.305.
10. Ahsan Ali S/o Ahmed Bux Bhutto CNIC No.45502-7503803-7 Village Muhammad Laique Bhutto PO Rohri Taluka Rohri District Sukkur Block Code:323010111 Silsla No.286.
11. Illahi Bux S/o Muhammad Laique Bhutto CNIC No.45502-1455934-5 Village Muhammad Laiq Bhutto PO Rohri Taluka Rohri District Sukkur Block Code:323010111 Silsla No.293.
12. Aqeel Ahmed S/o Ameer Bux CNIC No.45502-5413293-9 Village Wariyo Katpar Mando Dero PO Rohri Taluka Rohri District Sukkur Block Code:323010107 Silsla No.143.
13. Saeed Ahmed S/o Rahmatullah Bux CNIC No.45502-5756822-3 Village Ghulam Band Mari Mando Dero PO Rohri Taluka Rohri District Sukkur Block Code:323010108 Silsla No.71.
14. Rasheed Ahmed S/o Jameel Ahmed Lodhi Pathan CNIC No.45502-0859365-7 Mando Dero PO Rohri Taluka Rohri District Sukkur Block Code:323010113 Silsla No.205.

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15. Muhammad Ramzan S/o Qaisar CNIC No.45502-1630169-7 Village Mari Mando Dero PO Rohri Taluka Rohri District Sukkur Block Code:323010107 Silsla No.332.

All the applicants through their **special attorney** namely **Mr. Rafique Ahmed S/o Muhammad Bux**, Muslim, Adult, R/o Goth Muhammad Laqie Bhutto Miani Baghat PO Rohri, Taluka Rohri, District Sukkur CNIC No.45502-8242525-5

OBJECTIONS ON THE CONSTITUENCIES OF NA-206 AND NA-207 OF DISTRICT SUKKUR.

1. NA-206 of District Sukkur consisting of a total population 731,411.
2. NA-207 of District Sukkur consisting of a total population 756,492.
3. Tappedari Circle Rohri from STC Rohri consisting of 65,181 population of NA-206 of District Sukkur has been illegally broken and 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 and 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 cognate 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 ordinarily exceed ten percent.

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

5. That Union Council No.15 Patni (consisting of 4 wards) have been illegally broken and unlawfully detached 1 ward No.4 full and half from Ward No.3.

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6. That Infrastructure and basic facilities to the people shall badly affect in case of the delimitation of the constituency as proposed by the ECP is approved. The Civil facilities like Water, Sewerage, Sanitation and Development schemes shall be frustrated in case the delimitation conducted by the ECP is approved. Even by this impugned delimitation the voter shall be deprived of the said facilities and the people would face great deal of difficulties in their day to day affairs. The convenience of the people and their basic facilities have not been taken care of by the ECP / Delimitation Authorities while proposing the impugned delimitation.
7. The applicants propose the following amendment in delimitation of the constituencies of NA-206 and NA-207 of District Sukkur.

Delimitation by ECP Form 5

Sr No.	Constituency	Areas	POPULATION
1	NA-206	Taluka Pano Akil excluding following Tapedar Circle of Pano Akil STC i) Sundar Belo ii) Panhwari Jagir iii) Nauraja iv) Hingoro	365,789
		a) Taluka Saleh Pat b) Taluka Rohri excluding the following areas i) M.C Rohri and ii) Tapedar Circle Rohri of Rohri STC of Rohri Taluka	365,622
		Total:	731,411
2	NA-207	a) New Sukkur Taluka excluding i) Bagarji STC ii) Town Committee Bagargi iii) Purno Sukkur STC and b) Sukkur City Taluka excluding the following areas i) Charge No.1 ii) Charge No.2 and iii) Circle No.1, 2, 3 and 4 of Charge No.4 of District Sukkur	388,260
		a) Following areas of Taluka New Sukkur i) Bagrji STC ii) Town committee Bagrji iii) Purano Sukkur STC b) Sukkur City Taluka excluding the following area; i) Charge No.1 ii) Charge No.2 iii) Charge No. 1,2,3 & 4 of Charge No.4 c) M.C Rohri of Taluka Rohri d) Tapedar Circle Rohri of STC taluka Rohri e) the following tapedar Circles of Panoakil STC of Taluka Pano Akil; i) Sundar Belo ii) Panhwari Jagir iii) Nauraja iv) Hingoro	368,232
		TOTAL	756,492

Proposed delimitation by applicants

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Sr. No.	Constituency	Areas	POPULATION
1	P.S 22	Taluka Pano Akil including i) TC Arkohar ii) TC Sangrar of STC Sangrar of Taluka Rohri excluding following Tapedar Circle of Pano Akil STC i) TC Sundar Belo ii) TC Panhwari Jagir iii) TC Nauraja iv) TC Hingoro v) TC Shahpur vi) TC Sadhuja vii) TC Nindapur	361,272
2	P.S 23	a) Taluka Saleh Pat b) Taluka Rohri excluding the following areas i) M.C Rohri ii) TC Arkohar ii) TC Sangrar of STC Sangrar of Taluka Rohri	381,484
3	P.S 24	a) New Sukkur Taluka excluding i) Bagarji STC ii) Town Committee Bagargi iii) Purno Sukkur STC and b) Sukkur City Taluka excluding the following areas i) Charge No.1 ii) Charge No.2 and iii) Circle No.1, 2, 3 and 4 of Charge No.4 of District Sukkur	268,311 119,949
Total:			388,260
4	P.S 25	a) Following areas of Taluka New Sukkur i) Bagrji STC ii) Town committee Bagrji iii) Purano Sukkur STC b) Sukkur City Taluka excluding the following area; i) Charge No.1 ii) Charge No.2 iii) Charge No. 1,2,3 & 4 of Charge No.4 C) M.C Rohri of Taluka Rohri d) the following tapedar Circles of Panoakil STC of Taluka Pano Akil; i) TC Sundar Belo ii) TC Panhwari Jagir iii) TC Nauraja iv) TC Hingoro v) TC Shahpur vi) TC Sadhuja i) TC Nindapur	356,887

8. That Even on the basis of the above proposed amendments only minor changes are proposed which would not only save irrational distribution but so also shall make the constituencies compact without changing their geographical status. The delimitation of the constituencies of National Assembly shall not be affected by the above proposed changes.

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9. That this will meet with the ends of justice if your honour may be pleased to consider the representation / objections and allows the proposals made by the applicants.

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Authorized Person / Attorney
Of the applicants