

FACTS

The facts in brief leading to this representation are that the Delimitation Committee Sindh made following initial proposals for the Delimitation of National Assembly Constituency in District Khairpur of Sindh Province

No. & Name of Constituency	Extent of the Constituency	Population
NA – 208 Khairpur I	a) Taluka Khairpur	440,752
	b) Taluka Kotdiji Of District Khairpur	348,899
	Total	789,651
	NA – 209 Khairpur II	a) Mirwah Taluka
	b) Faiz Ganj Taluka	224,004
	c) Nara Taluka	160,985
	d) Following Tapedar Circles of Ranipur STC of Sobhodero Taluka	
	i) Gadeji	18,749
	ii) Raasoolabad	15,097
	iii) Tunia	6,544
	Total	777,870
NA – 210 Khairpur III	a) Gambat Taluka	263,746
	b) Kingri Taluka	340,218
	e) Sobhodero Taluka excluding the Following Tapedar Circles of Ranipur STC	234,038
	i) Gadeji	
	ii) Raasoolabad	
	iii) Tunia	
	Of District Khairpur	
	Total	838,002

The Petitioner above named respectfully submits his proposal for acceptance as final delimitation on Annexure A on consideration of the following amongst other grounds:


GROUND

1. That the Petitioner is registered voter at Serial No 31 Block Code No 333040403 of District Khairpur as such he is entitled to make

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representations for alterations in preliminary proposal of Delimitation Committee for District Khairpur

2. That the Petitioner has been contesting the general elections since year 2002, he was elected as member of National Assembly from NA – 216 Khairpur II in the last general elections of 2002. The Petitioner contested general elections of year 2013 from NA – 217 Khairpur III which now is renamed & proposed as NA – 210 Khairpur III.
3. That preliminary proposal of delimitation for National Assembly seats has been issued while ignoring the guidelines given in section 20 of The Elections Act 2017 and rules 7, 8, 9 & 10 of the Election Rules 2017.
4. That the Delimitation Committee has proposed the constituencies of NA 208 Khairpur I, NA 209 Khairpur II & NA 210 Khairpur keeping aside the existing boundaries of administrative units (in particular the boundaries of existing local councils, such as Union Councils), geographically compact areas, physical features of the areas, as proposed constituencies mostly cover rural areas, the road networking and convenience is a major issue with public residing in these areas, the facilities of communication and public convenience has been ignored in the proposed delimitation
5. That the Population Criteria in the proposed delimitation has also been violated, as NA 208 Khairpur I is having population of 789,651, NA 209 Khairpur II is having Population of 777,870 whereas population of NA 210 Khairpur III is 838,002 which is about 50,000 higher than NA 208 Khairpur I & 60,000 above the population of NA 209 Khairpur II.
6. That there were three National Assembly seats under the delimitation of year 2002, which were NA 215 Khairpur I (now NA 208 Khairpur I), NA 216 Khairpur II (now NA 209 Khairpur II) & NA 217 Khairpur III (now NA 210 Khairpur III), since the population increase in Talukas remained uniform therefore change in the existing constituencies of Khairpur District was not warranted.

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7. That the old NA 216 Khairpur II comprised of Nara Taluka, Faiz Ganj Taluka, Mirwah Taluka & Tapedar Circles Rasoolabad & Gadeji of STC Ranipur and Town Committee Ranipur. In the newly proposed NA 209 Khairpur II all the old revenue limits are kept intact excepting Ranipur Town without assigning any reasons.
8. That the Tapedar Circle Gadeji of Sobhadero Taluka proposed to be included in NA 209 Khairpur II, forms compactness with Taluka Mirwah. The Gadeji itself is a Union Council having its headquarter at National Highway leading from Karachi to Peshawar. Under the local government system Gadeji Union Council comprises of Deh Gadeji, Deh Bhellar of Tapedar Circle Gadeji and Deh Mir Khan Shahani of Tapedar Circle Ranipur, as such the people of this Union Council are tied in a political system at grass roots level with Ranipur Town. The provincial government has devised a system wherein the facilities to the public are provided on Union Council Level. The road networking in between the villages and Union Council headquarter are the important features of convenience provided by the governments. There are the roads emanating from Gadeji leading to Villages in Deh Bhellar & Tapedar Circle Ranipur which is the guiding principle to include these areas in the one and same constituency as laid down under section 20 of The Elections Act 2017.
7. That the Ranipur Town Committee is located at National Highway leading from Karachi to Peshawar at a distance of One & half Kilometers from Gadeji. Tapedar Circle Ranipur which is the part of Union Council is located on the West – Southern side of Ranipur Town and forms the rural agro based part of Ranipur Town which fact also proves the extent of facilities to be conjointly shared by people of Gadeji & Ranipur. The people of Tapedar Circle Gadeji, Tapedar Circle Pir Taj Mohammed & Tapedar Circle Ranipur are affiliated with Ranipur Town in terms of business as Ranipur is a market for them, education mostly children of

these Tapedar Circle are enrolled in schools and colleges of Ranipur and health facility as Rural Health Center Ranipur is the nearest health facility for them.

8. That the preliminary delimitation proposal has divided the people of Union Council Gadeji, Union Council Setharja Bala & Town Committee Ranipur (froming Dehs of Tapedar Circles Gadeji, Ranipur & Pir Taj Mohammed) into two constituencies of National Assembly which violates the principles of delimitation enshrined in the Elections Act 2017. Therefore these parts need to be included in NA - 209 Khairpur II. It is also matter of record that most of these areas formed the part of NA - 216 Khairpur II as it existed on the basis of delimitation of year 2002.
9. That Delimitation Committee has also ignored the population criteria of District Khairpur. The distribution of the population in all three Constituencies of National Assembly is not uniform, NA - 208 Khairpur I is populous to the tune of 789,651, NA 209 Khairpur II to the tune of 777,870 & NA 210 Khairpur III as 838,002.
10. That the population criteria under the delimitation proposal given by Petitioner also suits to the principles of delimitation laid down in section 20 of the Elections Act 2017. As under the proposed delimitation the population of NA 208 Khairpur I will remain unchanged, population of NA 209 Khairpur II would become 815,061 and that of NA 210 Khairpur III would become.
11. That the Petitioner carves indulgence of the Honorable Election Commission to call records of Local Councils from the District Election Commissioner Office Khairpur to ascertain the local limits of Union Council Gadeji which forms the part of Deh Gadeji, Deh Bhellar of Tapedar Circle Gadeji & Deh Mir Khan Shahani of Tapedar Circle Ranipur.
12. That the marked maps of the constituency are also attached.

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- 13. That the Petitioner seeks indulgence of the Honorable Commission to urge more grounds from the record at the time of hearing of this representation.
- 14. That the Petitioner therefore respectfully prays as under:

PRAYER

- a. That the Honorable Election Commission of Pakistan may be pleased to set aside the preliminary delimitation of the constituencies of National Assembly in District Khairpur of Sindh Province and accept the proposal of Petitioner (attached as Annexure A) for final List of Constituencies.
- b. Any other relief deemed fit and proper under the circumstances of the case.

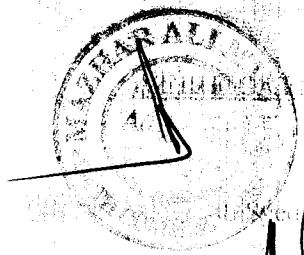
Dated: 03.04.2018

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PETITIONER:
mobile no - 03008313333
CNIC - 6119-5247123-5

VERIFICATION

I, Syed Javed Ali Shah son of Syed Umaid Ali Shah Jillani Adult, Muslim, r/o Lakyari Mohalla Hingorja Taluka Sobhodero District Khairpur do hereby state on oath that whatever stated herein above in the grounds and facts of representation is true and correct to the best of my knowledge and belief.

Verified at Islamabad this the 3rd day of March 2018



[Handwritten signature]
Deponent

Advocate

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MAZHAR ALI MAITLO
Oath Commission Khairpur

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DOCUMENTS FILED

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|---|------------|
| 1. Proposal for Final List of Constituencies | Annexure A |
| 2. Preliminary Proposal of Delimitation Committee | Annexure B |
| 3. Delimitation of year 2002 | Annexure C |
| 4. Map of proposed Constituencies | Annexure D |

DOCUMENTS RELIED UPON

1. Delimitation of Local Councils in District Khairpur to be called from District Election Office Khairpur
2. Any other document in rebuttal.

Dated: 03.09.2018

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PETITIONER

Drafted and drawn by me under the instructions of petitioner

Abdul Haq G Odho

ADVOCATE FOR PETITIONER

Office Address: Odho Law Chambers Sessions Court

Complex Khairpur Mir's Sindh

03003136923

Abdul Haq G Odho

ADVOCATE FOR PETITIONER

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Annexure A

Proposal of Constituencies by Petitioner

No. & Name of Constituency	Extent of the Constituency	Population
NA - 208 Khairpur I	a) Taluka Khairpur b) Taluka Kotdiji Of District Khairpur Total	440,752 348,899 789,651
NA - 209 Khairpur II	a) Mirwah Taluka b) Faiz Ganj Taluka c) Nara Taluka d) Following Tapedar Circles of Ranipur STC of Sobhodero Taluka i) Gadeji ii) Rasoolabad iii) Tunia & e) Town Committee Ranipur of Taluka Sobhodero Of District Khairpur Total	352,491 224,004 160,985 18,749 15,097 6,544 33,587 811,457
NA - 210 Khairpur III	a) Gambat Taluka b) Kingri Taluka c) Sobhodero Taluka excluding following areas i) Ranipur Town Committee ii) Tapedar Circle Ranipur iii) Tapedar Circle Gadeji iv) Tapedar Circle Rasoolabad v) Tapedar Circle Tunia Of District Khairpur Total	263,746 340,218 200,451 804,415

Dated: 03.04.2018

PETITIONER

ELECTION COMMISSION OF PAKISTAN

FORM - 5
[see rule 10(7)]

DRAFT LIST OF CONSTITUENCIES

Name of Province/Area: Sindh
National Assembly form Sindh Province

No. and Name of Constituency	Extent of the Constituency	Population
NA -196 Jacobabad	District Jacobabad.	1,006,297
	Total :	1,006,297
NA -197 Kashmore	District Kashmore.	1,089,169
	Total :	1,089,169
NA -198 Shikarpur-I	a) Taluka Shikarpur excluding Tapedar Circle Jano of STC Shikarpur and	367,013
	b) Taluka Khanpur of District Shikarpur.	276,283
	Total :	643,296
NA -199 Shikarpur-II	a) Taluka Lakhi;	248,143
	b) Taluka Garhi Yasin and	315,883
	c) Tapedar Circle Jano of STC Shikarpur of Taluka Shikarpur of District Shikarpur.	24,159
	Total :	588,185
NA -200 Larkana-I	a) Taluka Ratodero;	331,584
	b) Municipal Corporation Larkana excluding :- i) Charge No. 10 ii) Charge No. 11	384,256
	c) Akil STC of Taluka Larkana and	36,381
	d) Tapedar Circle Larkana of Larkana STC of Taluka Larkana of District Larkana.	4,064
	Total :	756,285
NA -201 Larkana-II	a) Taluka Dokri;	225,294
	b) Taluka Bakrani;	229,444
	c) The following areas of Taluka Larkana:- i) Kangah STC,	85,619
	ii) Berio Chandio STC,	70,532
	iii) Larkana STC excluding Tapedar Circle Larkana and	50,965
	d) The following Charges of Larkana Municipal Corporation:- i) Charge No. 10 and	49,547
	ii) Charge No. 11	56,705
	of District Larkana.	
Total :	768,106	

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No. and Name of Constituency	Extent of the Constituency	Population
NA -202 Kamber Shahdadkot-I	a) Qubo Saeed Khan Taluka;	85,970
	b) Shahdadkot Taluka;	202,745
	c) Sijawal Junejo Taluka;	117,459
	d) Mirokhan Taluka;	158,191
	e) Ranwati STC of Kamber Ali Khan Taluka and	95,513
	f) Tapedar Circle Khairpur Juso (Abri) of Kamber STC of Kamber Ali Khan Taluka of District Kamber-Shahdadkot.	19,619
	Total :	679,497
NA -203 Kamber Shahdadkot-II	a) Nasirabad Taluka;	151,500
	b) Warah Taluka;	229,971
	c) Kamber Ali Khan Taluka excluding the following areas:-	280,074
	i) Ranwati STC and	
	ii) Tapedar Circle Khairpur Juso (Abri) of Kamber STC	
	of District Kamber-Shahdadkot.	
	Total :	661,545
NA -204 Ghotki-I	a) Taluka Ubauro;	353,289
	b) Taluka Daharki;	310,079
	d) Taluka Mirpur Mathelo excluding the following areas:-	188,117
	i) Jarwar STC	
	ii) Machhalo STC and	
	iii) Tapedar Circle Darwesh Naich of Mirpur Mathelo STC	
	of District Ghotki	
	Total :	851,485
NA -205 Ghotki-II	a) Taluka Ghotki;	506,919
	b) Taluka Khan Garh;	149,008
	c) The following areas of Taluka Mirpur Mathelo:-	
	i) Jarwar STC,	49,240
	ii) Machhalo STC and	77,481
	iii) Tapedar Circle Darwesh Naich of Mirpur Mathelo STC	13,106
	of District Ghotki	
	Total :	795,754
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:-	236,003
	i) Municipal Committee Rohri	
	ii) Tapedar Circle Rohri of Rohri STC and	
	c) Taluka Salehpat	129,619
	of District Sukkur.	
	Total :	731,411

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No. and Name of Constituency	Extent of the Constituency	Population
NA -207 Sukkur-II	a) New Sukkur Taluka;	319,768
	b) Sukkur City Taluka;	231,589
	c) Municiple 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 Jageer,	12,776	
iii) Nauraja,	14,195	
iv) Hingoro and	33,002	
e) Tapedar Circle Rohri of Rohri STC of Taluka Rohri of District Sukkur.	65,181	
Total :		756,492
NA -208 Khairpur-I	a) Khairpur Taluka and	440,752
	b) Kotdiji Taluka of District Khairpur.	348,899
Total :		789,651
NA -209 Khairpur-II	a) Mirwah Taluka;	352,491
	b) Faiz Ganj Taluka;	224,004
	c) Nara Taluka;	160,985
	d) The following Tapedar Circles of Ranipur STC of Sobhodero Taluka:-	
	i) Gadeji,	18,749
ii) Rasoolabad and	15,097	
iii) Tunia	6,544	
of District Khairpur.		
Total :		777,870
NA -210 Khairpur-III	a) Gambat Taluka;	263,746
	b) Kingri Taluka;	340,218
	c) Sobhodero Taluka excluding the following Tapedar Circles of Ranipur STC:-	234,038
	i) Gadeji	
	ii) Rasoolabad and	
iii) Tunia		
of District Khairpur.		
Total :		838,002
NA -211 Naushahro Feroze-I	a) Kandiaro Taluka;	322,439
	b) Mehrabpur Taluka;	247,280
	c) Bhiria Taluka excluding the following areas:-	219,290
	i) Tapedar Circle Mad Aleem,	
	ii) Tapedar Circle Tharushah,	
	iii) Tapedar Circle Molhan,	
iv) Tapedar Circle Dalpota of Bhiria STC and		
v) Tapedar Circle Gher Gaju of Bhiria Road STC		
of District Naushahro Feroze.		
Total :		789,009

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