

The Secretary,
Election Commission Of Pakistan,
Election Commission Secretariat,
Election House Constitution Avenue
G-8/2 Islamabad.

Muhammad Yakoob Kakpoto,
S/O Haji Fateh Muhammad
Kakepoto, by caste Kakepoto,
R/O Village Haji Deen Muhammad
Kakepoto, P.O. Shahpurchakar,
TC Sahita, Taluka Shadadpur,
District Sanghar.
CNIC No.44204-2293647-4.
Cell # 0300-3736200.
0345-3736200.

1
11/02/01/2018

.....Applicant.

REPRESENTATION UNDER SECTION
21(3) OF THE ELECTION ACT, 2017
& RULE 12 OF THE ELECTION RULES, 2017
AGAINST DELIMITATION OF NA-215
& NA- 217 SANGHAR.

Being aggrieved and dis-satisfied with the delimitation /draft list of Constituencies of National Assembly of Sanghar, Published on 5-03-2018 by Election Commissioner of Pakistan. The above named applicant prefer this representation that this Honourable Commissioner after hearing /considering the representation, amend/alter or modified the delimitation /draft list of NA-215 and NA-217, of Sanghar District, on consideration of the following facts and grounds:-

FACTS.

Brief facts of the representation are as under:-

1. That, the applicant is law abiding and peace loving citizen of Pakistan and respectable inhabitant of Sanghar District and politically well aware personality of the local area.

1947

1

2. That, the applicant is registered voter of NA-215 Sanghar-I from Taluka Shahdadpur, District Sanghar, as per delimitation draft list.

(Copy of the voter list is annexed herewith and marked as annexure "A").

JA/02/04/2018

3. That, every voter including applicant is ambitious and willing to ensure that pre-poll management and all other affairs relating to the conduct of General Elections to be conducted fairly/ impartially/honestly according to constitution of Pakistan and existing laws and principles as well as to maintain the spirit of democracy intact.

4. That, Sanghar district according to delimitation /draft list of constituencies carved as NA-215, NA-216 and NA-217 comprising all the Talukas of District Sanghar i.e. Talukas Sanghar, Khipro, Jam Nawaz Ali, Talukas Tando Adam and Shahdadpur etc.

"Copies of the Draft/list of Constituencies for the relevant District and relevant delimitation Map are restore annexed herewith and marked as annexure "B, C & D" respectively.

5. That, according to delimitation/draft list NA-215 Sanghar-I comprised of (a). Area of Sanghar Taluka viz:- (i).Municipal Committee Sanghar, (ii). Town Committee Tando Mitha Khan, (iii). Sanghar STC, (iv). Tando Mitha Khan STC excluding Tapedar Circles Sadho and Bahram Bari, (b). Area of Sinjhoru Taluka Viz:- (i). Municipal Committee Sinjhoru, (ii). Town Committee Jhol, (iii). Khadro STC, (iv). Sinjhoru STC, (v). Town Committee Khadro, (vi). Tapedar Circle Jhol of Jhol STC, (vii). Tapedar Circle Duthro of Jhol STC, and (c). Area of Shahdadpur Taluka excluding (i) Town Committee, Shahpurchakar, (ii).Shahpurchakar STC, (iii). Tapedar Circle

2000
1000



Karamullah Dahri, of Sarhari STC and (iv). Tapedar Circle Bhaji of Shahdadpur STC of District Sanghar. Whereas, NA-217 Sanghar-III, comprises of viz:-(a). Tando Adam Taluka (b). Shahdadpur Taluka excluding (i). Town Committee Shahpurchakar, (ii). Shahpurchakar STC, (iii) Tapedar Circle Karamullah Dahri of Sarhari STC and Tapedar circle Bhaji of Shahdadpur STC of District Sanghar, which violates the Principle of delimitation as STC Shuja Jakharo of Tapedar Circle Karamullah Dahri is adjacent to NA-215, but it has been included in NA-217 and touch the boundaries of NA-215. Whereas TC Sahita of Shahpurchkar STC is at the distance of more than 30 Kilo Meters from NA-215 has been included in NA-217 and TC Sahita is adjacent to the boundaries of NA-217, which shows malafide on the part of delimitation committee, hence this representation on following grounds:-

8/02/04/2013

GROUNDS.

1. That, the principle of delimitation is for General seats according to Election Rules 2017 is that all constituencies for General seats shall as far as practicable be delimited having records to be distribution of Population in Geographical compact areas, Physical features, existing boundaries of Administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity of constituencies and if TC Shuja Jakharo be included in NA-215 and TC Sahita excluded from NA-217 and included in NA-217. The Population in Geographical compact area remains equal and as the population of NA-215 will become 6,89,999 and population of NA-217 will become 6,99,902 and it is also clarify that the existing boundaries on Administrative unit of NA-217 will remains intact and facilities of communication and public conveyance and other cogent factors be ensured.

100
100



2. That, the map of delimitation/draft, is itself explanatory.

3. That, the instant delimitation of NA-215 and NA-217 of District Sanghar violates their rights of the dignity of applicant as well as voters of the said constituencies as enshrined under the Constitution of Islamic Republic of Pakistan and it is the right to demand political and democratic structure of process of electoral process conducted on equality, fairness and transparency.

4. That instant delimitation of the constituencies NA-215 and NA-217 of District Sanghar is in clear violation of existing laws, rules, principals and against will and objections of general public as well as principles of natural justice.

5. That, further grounds will be advance with the permission of Commission at time of hearing of the representation.

It is, therefore, submitted that constituencies NA-215 and AN-217 of Sanghar District be carried out in the manner prescribed in following table and same may be confirmed under section 20 of the Election Act, 2017.

NA-215 Sanghar-I.	a).Following Area of Sanghar Taluka:-	75,410
	(i).Municipal Committee Sanghar.	
	(ii).Town Committee Tando Mitha Khan.	5,218
	(iii). Sanghar STC.	1,67,374
	(iv). Tando Mitha Khan STC excluding Tapedar Circles Sadho and Bahram Bari.	68,939
	b) The following Area of Sinjhor Taluka:-	
	(i). Municipal Committee Sinjhor.	19,711
	(ii).Town Committee Jhol.	21,787
	(iii). Khadro STC.	65,273
	(iv). Sinjhor STC.	84,771
	(v).Town Committee Khadro.	15,426
	(vi).Tapedar Circle Jhol of Jhol STC.	12,101
	(vii).Tapedar Circle Duthro of Jhol STC.	14,808
		23,613

Handwritten signature and date: 27/04/2018

11
12



	(c). The following Area of Shahdadpur Taluka:- (i). Town Committee, Shahpurchakar. (ii).Shahpurchakar STC, excluding TC Sahita. (iii).Tapedar Circle Karamullah Dahri including TC Shuja Jakho of Sarhari STC. (iv).Tapedar Circle Bhaji of Shahdadpur STC. of District Sanghar. Total.	33,907 43,393. 22,989 15,279 33,907. Total. 6,89,999
NA-217 Sanghar-III.	(a). Tando Adam Taluka. (b). Shahdadpur Taluka excluding the following boundaries:- (i).Town,Committee,Shahpurchakar. (ii).Shahpurchakar STC excluding TC Sahita (iii) Tapedar Circle Karamullah Dahri including TC Shuja Jakhro of Sarhari STC. (iv).Tapedar circle Bhaji of Shahdadpur STC- of District Sanghar Total.	3,57,919 3,41,983 Total: 6,99,902

8/07/04/2018

P R A Y E R.

It is, therefore, prayed that the representation of applicant may be allowed and Delimitation of the District Sanghar for the Constituency of National Assembly be carried out as per proposals given supra, in the larger interest of Justice.

ISLAMABAD.

DATED: 2-04-2018.



APPLICANT.

(Muhammad Yakoob Kakepoto)
S/O Fajr Fateh Muhammad.

11-11-11

