

**RE: MEMORANDUM OF
REPRESENTATION**

BEFORE THE ELECTION COMMISSION OF PAKISTAN

Ghous Bux Khan Mahar S/O
Qalandar Bux Khan Mahar
Muslim, adult
Resident of:-

*JA/29/03/2018
1-4*

- a) Village Wazirabad
Taluka Lakhi
District Shikarpur
Sindh
- b) Presently r/o House No. 15-B,
12th Central Street
DHA, Phase II
Karachi, Sindh
- c) Mobile no 03008565532

.....Petitioner

VERSUS

Election Commission of Pakistan
Constitution Avenue, G-5/2
Islamabad
Through its secretary
.....Respondent

**MEMORANDUM OF REPRESENTATION FOR NATIONAL
ASSEMBLY SEATS OF NA-198 AND NA-199 IN DISTRICT
SHIKARPUR, SINDH**

The Petitioner above named most respectfully submits as under:-

1. That the Petitioner ~~no.1~~ is a sitting MNA in the National Assembly having been elected in the General Elections of 2013. He has been elected an MPA and MNA several times in the past as well. The Petitioner is a voter in NA-199, a copy of the Voter's Certificate is enclosed as **Annex A**.

4. Presently, the Petitioner ~~no.1~~ is an MNA hailing from NA-203 Sindh, covering Taluka Lakhi and Taluka Ghariyaseen. Before the impugned provisional delimitation, there were 2 National constituencies in the District in issue as they are now, which are spelt out as follows:-

- | | | | | |
|-----|--------|---|---|-------------------------------------|
| i) | NA-202 | - | - | Taluka Shikarpur and Taluka Khanpur |
| ii) | NA-203 | - | - | Taluka Ghariyaseen and Taluka Lakhi |

5. After the 2017 census the National constituencies in the area in question have remained same as before.

6. The provisional delimitation is as per the principles of delimitation having been spelt out in section 20 of the Elections Act, 2017, there for it is suggested that they should not be further amended.

This fact is further supported by the under mentioned reasons:

29/03/2018

819/50/62/R

a) The ECP has rightly kept the Taluka of Khanpur and Lakhi separate because problem here is that Taluka Lakhi is dominated by the Mahar tribe and Taluka Khanpur has the Jatoh tribe in abundance and is a known fact that these 2 tribes have recently come at peace after a long bloody feud which resulted in loss of more than 350 precious lives (newspaper clippings attached as annex B, B1 and B2). So to maintain peace in the area it is very important that these 2 Talukas should not be joined. The joining of these two constituencies/Talukas violates the fundamental rights of life of the people of these two Constituencies, guaranteed under articles 9 and 14 of the Constitution.

b) Since 1979 Taluka Ghari Yaseen and Taluka Lakhi had the status of subdivision whereas Taluka Shikarpur and Taluka Khanpur had the same and this is how the people are affiliated even today;

c) The Petitioners' political party i.e. PML(F) has carried out a lot of development work in Talukas Ghari Yaseen and Lakhi as both the MNA and MPA hail from PML(F). Now if the Petitioner ~~No.1~~ moves to a different constituency his opponent will have an edge over him as he will be new in the area, thereby not providing him with equal footing or level playing field to contest the elections;

d) There are hardly any roads between Taluka Lakhi and Khanpur whereas Taluka Lakhi and Ghari Yaseen are attached together.

8/29/08/2018

10. As per requirements of law the Petitioners are filing the following maps/documents:-

- a) Copy of the petitioners CNIC as **Annex-C**.
- b) Copy of the proposed delimitation by ECP which is supported in this petition as **Annex-D**.
- c) The map of Shikarpur District showing 2 National Assembly constituencies, as proposed by the ECP, which have been favored in this representation, which is attached as **Annex-E**.

PRAYER

1. In light of the above, it is most humbly prayed that the Hon'ble Election Commission of Pakistan may kindly be pleased to keep the constituencies as have been proposed by ECP in the preliminary delimitation.
2. If there are objections filed against the said proposals of ECP I may be informed and be considered a party to intervene and defend my point of view.
3. Any other order deemed fit may be passed in the interest of justice.



PETITIONER

Islamabad:
Dated: 29-03-18