

To,

The Secretary,  
Election Commission of  
Pakistan, Islamabad.

**REPRESENTATION UNDER SECTION 21 (2) & (3)  
OF ELECTION ACT-2017/ REPRESENTATION /  
OBJECTIONS IN RESPECT OF PROPOSED  
DELIMITATION OF N.A.204, GHOTKI-I, & N.A.205,  
GHOTKI-II, NATIONAL ASSEMBLY OF PAKISTAN.**

The voters named below respectfully submit their representation as under:-

1. That, the objector, namely Khalid Ahmed Khan Lund son of Haji Noor Mohammad Khan Lund, by caste Lund, adult, muslim, residing of Khalid Abad, P/O Jarwar, Taluka Daharki, District Ghotki, having CNIC No:45101-0616127-9. He is sitting MNA from NA-200, Ghotki-I.
2. That previous constituency NA-200, Ghotki-I, has been renumbered as NA-204, Ghotki-I and it had been comprised of Taluka Ubauro, Taluka Daharki and Taluka Mirpur Mathelo, except (STC/Supervising Tapedari Circle), STC Jarwar and STC Machhalo.
3. That, previously NA-201, Ghotki-I, was comprised of Taluka Ghotki, Taluka Khangrah, (STC/Supervising Tapedari Circle), STC Jarwar, STC Machhalo of Taluka Mirpur Mathelo. In present delimitation process above constituency has been renumbered as, NA-205 Ghotki-II.

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4. That, though urban area of Municipal Committee Mirpur Mathelo was lying within the limits of old NA-200 Ghotki-I, presently NA-204 Ghotki-I, yet the rural area of Union Council Garhi Chakar, falling within the territorial limits of STC Jarwar and NA-201, presently 205 were illegally brought into the Municipal Limits of Municipal Committee Mirpur Mathelo, in the Local Government Elections 2015. This inclusion of rural area of Union Council Garhi Chakar, in Municipal Limits of Mirpur Mathelo were challenged through constitution petitions CP No:D-2119/2015 to CP No:D-2121/2015, before Honourable High Court of Sindh, Bench at Sukkur, which were later on sent to principle seat of the High Court of Sindh at Karachi and renumbered as C.P.No:D-5702/2015 to C.P.No:D-5705/2015. These petitions, alongwith other petition were decided by common judgments/short orders by Honourable High Court of Sindh, on 18.09.2015. Such decisions of High Court in said constitution petitions, in said resulted into exclusion of the areas of the Union Council Garhi Chakar, comprised of dehs Garhi Chakar, Jhangan, Baloch Khan, Pipri and Belo Bozdar, and census blocks numbers from the limits of Municipal Committee Mirpur Mathelo. Hence the Municipal Committee Mirpur Mathelo and Union Council Garhi Chakar were reverted to same position.

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5. That, once again, an attempt was made to include the rural area of Tapo Garhi Chakar and Tapo Sabar Bozdar in the Urban Limits of Municipal Committee Mirpur Mathelo, during the census 2016. It is pertinent to mention here, that; the urban areas and the rural areas have been separately indicated in census block numbers in the census record of National Census, District Ghotki. The census staff had to assign the urban block numbers to urban areas with charge code No:33005 and rural areas with block numbers charge code 33001 or 33002. Instead thereof, the rural area of Dehs, 1. Deh Garhi Chakar, 2. Deh Jhangan, 3. Deh Baloch Khan. 4. Deh Pipri, 5. Deh Belo Bozdar and 6. Deh Barar have been assigned urban block numbers, as follows:-

| S.No. | CENSUS BLOCK CODE |   |   |   |   |   |   |   |   | NAME OF BLOCK |
|-------|-------------------|---|---|---|---|---|---|---|---|---------------|
| 186   | 3                 | 3 | 0 | 0 | 5 | 0 | 8 | 0 | 1 | Pipri         |
| 187   | 3                 | 3 | 0 | 0 | 5 | 0 | 8 | 0 | 2 | Pipri         |
| 188   | 3                 | 3 | 0 | 0 | 5 | 0 | 8 | 0 | 3 | Belo Bozdar   |
| 189   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 1 | Garhi Chachar |
| 190   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 2 | Garhi Chachar |
| 191   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 3 | Garhi Chachar |
| 192   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 4 | Garhi Chachar |
| 193   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 5 | Garhi Chachar |
| 194   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 1 | Barar         |
| 195   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 2 | Jhangan       |
| 196   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 3 | Jhangan       |
| 197   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 4 | Jhangan       |
| 198   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 1 | Baloch Khan   |
| 199   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 2 | Baloch Khan   |
| 200   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 3 | Baloch Khan   |

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6. That, abovementioned manipulation through census record has been challenged before Honourable High Court of Sindh, Bench at Sukkur, by the Municipal Committee Mirpur Mathelo, vide CP No:D-264 of 2018, (Municipal Committee Mirpur Mathelo versus Federation of Pakistan and 12 others).

7. That, the areas under Union Council Garhi Chakar are no more part of the Municipal Committee Mirpur Mathelo. Following areas of Tapo Garhi Chakar and Tapo Sabar Bozdar, Taluka Mirpur Mathelo with following dehs are shown and included in NA-205, Ghotki-II, as per official marked map, issued by Election Commission of Pakistan, but the population and census blocks have been shown included in NA-204, Ghotki-I, because of wrong inclusion of population of these areas in the Municipal Committee Mirpur Mathelo. Following census blocks needs to be corrected and included in NA-205, Ghotki-II, to confirm the delimitation shown on the map of Election Commission.

| S.No. | CENSUS BLOCK CODE |   |   |   |   |   |   |   |   | NAME OF BLOCK |
|-------|-------------------|---|---|---|---|---|---|---|---|---------------|
| 189   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 1 | Garhi Chachar |
| 190   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 2 | Garhi Chachar |
| 191   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 3 | Garhi Chachar |
| 192   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 4 | Garhi Chachar |
| 193   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 5 | Garhi Chachar |
| 194   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 1 | Barar         |
| 195   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 2 | Jhangan       |
| 196   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 3 | Jhangan       |
| 197   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 4 | Jhangan       |
| 198   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 1 | Baloch Khan   |
| 199   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 2 | Baloch Khan   |
| 200   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 3 | Baloch Khan   |

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8. That, while carrying out delimitation between NA-204 and 205, the population of Tapo Garhi Chakar and Tapo Sabar Bozdar have been wrongly included in NA-204, instead of NA-205.

9. That, there was no need to include the population of Tapo Garhi Chakar and Tapo Sabar Bozdar, in NA-204, Ghotki-I, instead of NA-205, Ghotki-II, where it was traditionally and historically remained part of old NA-201, New NA-205, Ghotki-II.

10. That, the objections have been filed within time.

11. That, the objectors crave permission to raise any legal factual relevant ground at the time of hearing these objections, as permission under law.

PRAYER:-

It is therefore prayed, that; in view of above submissions and objections, the delimitation in respect of NA-204 and NA-205, may be corrected and population of following dehs and census block numbers may be excluded from, NA-204 Ghotki-I and included in NA-205, Ghotki-II.

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| S.No. | CENSUS BLOCK CODE |   |   |   |   |   |   |   |   | NAME OF BLOCK |
|-------|-------------------|---|---|---|---|---|---|---|---|---------------|
| 189   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 1 | Garhi Chachar |
| 190   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 2 | Garhi Chachar |
| 191   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 3 | Garhi Chachar |
| 192   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 4 | Garhi Chachar |
| 193   | 3                 | 3 | 0 | 0 | 5 | 0 | 9 | 0 | 5 | Garhi Chachar |
| 194   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 1 | Barar         |
| 195   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 2 | Jhangan       |
| 196   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 3 | Jhangan       |
| 197   | 3                 | 3 | 0 | 0 | 5 | 1 | 0 | 0 | 4 | Jhangan       |
| 198   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 1 | Baloch Khan   |
| 199   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 2 | Baloch Khan   |
| 200   | 3                 | 3 | 0 | 0 | 5 | 1 | 1 | 0 | 3 | Baloch Khan   |

ATTORNEY OF OBJECTOR

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DOCUMENTS ANNEDED:-

AS PER INDEX.