

Handwritten signature and date: 27/03/2018

To,  
The Honourable Secretary,  
Election Commission of Pakistan,  
Islamabad.

DATED 26.03.2018

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

Respected Sir,

We the applicants / voters of our constituencies, most humbly and respectfully brings 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. Jam Mahtab Hussain Dahar s/o Jam Mumtaz Hussain Khan Dahar Bearing CNIC No. 45105-1852728-1, r/o village Bashir Abad Ubauro Taluka Ubauro, District Ghotki Voter of Constituency P.S-18 Sindh and N.A 204, Ghotki-I.
2. Altaf Hussain Chughtai s/o Hakeem Muhammad Baksh Chughtai, Bearing CNIC No. 45101-0127117-1 r/o House No. 484, Muhammadi Mosque, Annaj Mandi Deharki, District Ghotki, voter of P.S-19 Ghotki-II and N.A 204 Ghotki-I

**OBJECTIONS ON THE CONSTITUENCIES OF P.S 18, P.S 19, P.S 20 AND P.S 21 GHOTKI**

1. The total population of the District Ghotki is **16,47,239**. District Ghotki consists of two Seats of National Assembly and four seats of Provincial Assembly allocated by the FCP. The population of the

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constituencies is at more variance than it should have been on the basis of rational division of the whole population of District Ghotki either on the basis of formula fixed by the ECP or on the basis average distribution or at proportionate distribution of the population between the constituencies of District Ghotki Sindh. Which comes to:

**16,47,239 : 4 = 411,810 for each Provincial Assembly Seat**

**16,47,239 : 2 = 823,620 for each National Assembly Seat**

2. The total population of PS-18, Ghotki-I, is **425,222** while the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 368,410. While if the compliance of sub-section (3) of section 20 of the Act,2017 is made at variance of 10% of the population then too becomes more than the average fixed by the ECP. Hence in order to rationalize the population between the constituencies of the District Ghotki, the proposal is given below.

***20 (3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.***

3. The inclusion of two Tappa circles vis Berutta (with population of 12075) and Katta (with population 20167) would not only imbalance the population census, but so also would become a situation of gerrymandering, as it would have a far bearing effect on the area and crosses the average population of 368,000.
4. The total population of PS-19, Ghotki-II, is **426,263** while the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 368,410.

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5. The total population of PS-20, **402,266**, while the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 368,410.
6. That while carving out the limitation of P.S 19 and P.S 20 Ghotki, the administrative units of Tappedari Circle Guloo Pitafi has been illegally broken in violation of the mandate given to the delimitation authorities. Tappedari circle Guloo Pitafi earlier situated in P.S 19-Ghotki, consisting of 4 Dehs i.e. i. Guloo Pitafi ii. Khirohi, iii. Suchyaro Chak No.1, and iv. Suchyaro Chak No. 2.

The whole tappedari Circle is neither retained in P.S-19 nor in P.S 20, while Sucharyo chak No. 1 (whole Deh) has been illegally broken into two parts, which is in complete violation of the mandate given to the delimitation authorities.

It is further submitted that the Sucharyo chak No. 1 (part) has been illegally included in Tappedari circle Kandhalo of P.S 20 Ghotki-III

7. The total population of PS-21, ghotki-IV, **393,488** while the average number of population as per the formula fixed by Election Commission of Pakistan (ECP) is 368,410.

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**DELIMITATION BY ECP**

**PROPOSED BY APPLICANTS**

Province Sindh	Total Population by ECP-2018	PROPOSED BY APPLICANTS		Rational Population
		Included	Excluded	
PS-18	4,25,222	-	Beruta TC -12075	4,13,147
PS-19	4,26,263	Beruta Tappa +12075	Guloo Pitafi TC -28047	4,10,291
PS-20	4,02,266	Guloo Pitafi +28047	Jahanpur TC 21415	4,08,898
PS-21	3,93,488	Jahanpur TC +21415	-	4,14,903

8. That the share of seats of National Assembly have been divided into 2 seats consisting of population of 785,135. But yet NA-204 Ghotki-1 is consisting at **851,485** population which is in complete violation of the average population formula of Election Commission of Pakistan (ECP) while NA-205 Ghotki-2 is consisting of **795,754** population.

**DELIMITATION BY ECP**

**PROPOSED BY APPLICANTS**

N.A 204 Ghotki-1	851,485	Population of 28047 be excluded i.e whole Tapedari Circle <b>Guloo Pitafi</b> (Having population of <b>28047</b> )	823,438
N.A 205 Ghotki-2	7,95,754	Population of 28047 be included i.e. whole Tapedari Circle ( <b>Guloo Pitafi</b> Having population of <b>28047</b> )	823,801

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9. That Administrative unites have also been broken in terms of Union Councils of local Government.
10. That the delimitation authorities have not followed the mandatory provisions of law and the conditions laid down in section 20 of the Election Act, 2017, which provides as under:

***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.***

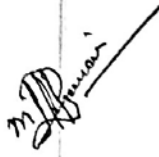
***(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.***

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.

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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.



APPLICANT NO.1

APPLICANT NO.2

Jam Mahtab Hussain Dahar s/o Jam Mumtaz Hussain Khan Dahar Bearing CNIC No. 45105- 1852728-1, r/o village Bashir Abad Ubauro Taluka Ubauro, District Ghotki Voter of Constituency P.S-18 Sindh and N.A 204, Ghotki-I.	Altaf Hussain Chughtai s/o Hakeem Muhammad Baksh Chughtai, Bearing CNIC No. 45101-0127117-1 r/o House No. 484, Muhammadi Mosque, Annaj Mandi Deharki, District Ghotki, voter of P.S-19 Ghotki-II and N.A 204 Ghotki-I
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