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7/2/2018
22/3/18

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The Security,
Election Commission of Pakistan,
Office of the Election Commission of Pakistan, Islamabad.

**REPRESENTATION/OBJECTIONS IN RESPECT OF
PROPOSED DELIMITATION OF N.A.204, GHOTKI-I &
N.A.205, GHOTKI-II, NATIONAL ASSEMBLY OF
PAKISTAN**

The objectors named below respectfully submit objections
as under:-

1. That, the objectors named-below are residing of union council Garhi Chakar, namely each, 1. Akhtar Ali son of Mir Mohammad, 2. Israr Ahmed son of Abdul Wahid, 3. Maroof Hussain alias Najam Khan, son of Hamid Ali, 4. Saleh Mohammad son of Pir bux, 5. Mohammad Faheem son of Sultan Ahmed, & 6. Waqar Ahmed son of Mohammad Hashim, Taluka Mirpur Mathelo, District Ghotki.
2. 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 constituencies have been renumbered as, NA-205 Ghotki-II.
3. The previous constituency NA-200, Ghokti-I, has been renumbered as NA-204, Ghokti-I and it had been comprised of Taluka Ubauro, Taluka Daharki and Taluka Mirpur Mathelo, except (STC/Supervising Taperdari Cricle), STC Jarwar and STC Machhalo.

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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 STA 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 mentioned below, before Honourable High Court of Sindh, Bench at Sukkur, which were later on decided at principle seat of the High Court of Sindh at Karachi. In compliance of common judgments/short orders of Honourable High Court of Sindh, dated 18.09.2015, in said constitution petitions, areas of the Union Council Garhi Chakar comprised of following dehs and census blocks numbers were excluded from the limits of Municipal Committee Mirpur Mathelo and such Union Council was renumbered as U/C No:66, Garhi Chakar, having four wards, as under:-

NAME OF UNION COUNCILS	WARDS	DEHS	CENSUS BLOCK NUMBERS
No:66 UC Garhi Chakar	Ward No:1	Garhi Chakar	330020401-02-03-04

=	Ward No:2	Jhanghan	330020406-07-08
=	Ward No:3	Deh Baloch Khan	330020307-07-08-10
=	Ward No:4	Deh Pipri Deh Belo Bozdar	330010401-02-03

Photo state copy newly proposed changes, duly approved, is annexed.

Hence the Municipal Committee Mirpur Mathelo and Union Council Garhi Chakar were reverted to same position.

5. That, once again, an attempt was made to include the rural area of Union Council Garhi Chakar 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 Jhanghan, 3. Deh Baloch Khan. 4. Deh Pipri, 5. Deh Belo Bozdar and 6. Deh Barar have been assigned urban block numbers, as follows:-

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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

Photo state copies of 13 Leaves of Sixth Population and Housing Census 2016, List of Enumerators Census District Mirpur Mathelo, from Sr. No:136 to 200, total 12 pages are annexed.

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, inspite of the fact, that; Union Council Garhi Chakar was no more part of the Municipal Committee Mirpur Mathelo, but perpetrating same wrong the partially STC Jarwar is made part of NA-205, Ghotki-II, and its parts comprised of union

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council Garhi Chakar have been shown in the NA-204, Ghotki-I, on the basis of abovementioned wrong block numbers showing them as part of Municipal Committee Mirpur Mathelo.

8. That, while carrying out delimitation between NA-204 and 205, the population has been wrongly distributed.

9. That, by restoring the area of union council Garhi Chakar, in NA-205, will create balance of population between two constituencies i.e.,

POPULATION CALCULATION
AS PER PRESENT DELIMITATION RECORD.

NA-204 Ghotki-I,	851585	Persons.
NA-205 Ghotki-II,	795754	Persons.
U/C Garhi Chakar	25458	Persons.

Position of population after restoration of Union Council Garhi Chakar to NA-205, Ghotki-II, as under:-

NA-204 Ghotki-I,	826127	Persons.
NA-205 Ghotki-II,	821212	Persons.

10. That, there was no need to include the area and population of union council Garhi Chakar, 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.

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11. That, the delimitation of both the constituencies have been done in disregard to distribution of population in geographically compact areas.

12. That, the delimitation has been done without considering geographical and physical future of the area.

13. That, the existing boundaries of administrative unit, i.e., STC Jarwar has been broken, violated without considering its violative effect of provisions of section 20 of Election Act-2017.

14. That, facilities of communications public convenience and other cognate factors had not been considered to ensure homogeneity in the creation of constituencies.

15. That, repeated attempts of gerrymandering have been made to establish political advantage for a particular political party and group.

16. That, unbalanced discriminatory delimitation has been done in respect of abovementioned two constituencies.

17. That, the delimitation under objection is intended to defeat the ends of justice and the objects of the statutes.

18. That, there is glaring malafides or criminal negligence on the part of the staff having conducted the delimitation proceedings in respect of abovementioned two constituencies.

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19. That, the objections have been filed within time.
20. 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 by restoring union council Garhi Chakar, to NA-205 Ghotki-II.

ATTORNEY OF OBJECTORS

Mund

Maroof Hussain alias Najam Khan
S/O Hamid Ali, resident of Lund,
resident of village Pir Bux Lund,
Union Council Garhi Chakar,
Taluka Mirpur Mathelo, District
Ghotki, holding
CNIC No:45104-5227308-5.
Cell No:0300-3269211.

DOCUMENTS ANNEDED:-

1. Photo state copy newly proposed changes, duly approved.
2. Photo state copies of 13 Leaves of Sixth Population and Housing Census 2016, List of Enumerators Census District Mirpur Mathelo, from Sr. No:136 to 200, total 12 pages.

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3. Photo state copy of certified true copy of constitution petition, bearing No:D-264 of 2018, (Municipal Committee Mirpur Mathelo versus Federation of Pakistan and others), before Honourable High Court of Sindh, Bench at Sukkur.
4. Photo state copy of parawise comments, filed by the Census District Officer Mirpur Mathelo, Census District/ Assistant Commissioner Mirpur Mathelo, in Constitution Petition, bearing No:D-264 of 2018, (Municipal Committee Mirpur Mathelo versus Federation of Pakistan and others), before Honourable High Court of Sindh, Bench at Sukkur.