

DATED 26.03.2018

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

HA 27/07/2018
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Subject: **MEMORANDUM OF REPRESENTATION AGAINST THE
DELIMITATION OF THE CONSTITUENCIES OF DISTRICT
SUKKUR**

Respected Sir,

We the applicants / voters of our constituencies, most humbly and respectfully bring 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

01. Mr. Shahid Ali Buriro
S/o Muhammad AyoubBuriro
CNIC No. 45502-3372671-3
Village SadhloNando Kohistan PO Cement Factory
Taluka rohri District Sukkur
Block Code: 323010114
Silsa No. 850

02. Mr. Naik Muhammad
S/o Hidayatullah Sarwari
CNIC No. 45502-0840196-5
Village Sodho Khan Sarwari Taluka Rohri
District Sukkur
Block Code: 323010114
Silsa No. 415

03. Abdul GhaffarBuriro
S/o Allah WadhayoBuriro
CNIC No. 45502-5072823-3
Village SadhloNando Kohistan PO Cement Factory
Taluka Rohri District Sukkur
Block Code: 323010114
Silsa No. 29

04. Samandar Khan
S/o Rozi Khan
CNIC No. 45502-0845570-5
MohallahPathan Colony near Cement
Factory Rohri District Sukkur
Block Code: 323010114
Silsa No. 234

05. Taaj MuhammadS/o Khair Muhammad
CNIC No. 45502-0823842-3
MohallahPathan Colony near Cement Factory Rohri
District Sukkur
Block Code: 323010114
Silsa No. 909

06. Mumtaz AliS/o Ali Nawaz
CNIC No. 45502-7428724-7
Village Shah Maqsood PO Cement Factory
Nando Kohistan Taluka Rohri District Sukkur
Block Code: 323010114
Silsa No. 195

07. Abid Hussain ShaikhS/o DhaniBux Shaikh
CNIC No. 45502-5599333-1
Village AchyoonQubiyoonGhazi Khan Shaikh Umar
Kass Taluka Rohri District Sukkur.
Block Code: 323010103
Silsa No. 134

08. Muhammad Ali Shaikh
S/o Muhammad Bux Shaikh
CNIC No. 45502-0409040-1
Village AchyoonQubiyoon PO Rohri Taluka
Rohri District Sukkur
Block Code: 323050101
Silsa No. 03

09. NiazHussain S/o Muhmmad Saleh
CNIC No. 45502-3045273-3
Village AchyoonQubiyoon Umar Kass PO Rohri
Taluka Rohri District Sukkur
Block Code: 323010103
Silsa No. 196

10. Ghulam Sarwar S/o Khamiso Khan
CNIC No. 45504-8660240-1
Village Ghulam Sarwar Mirani near Olper
Factory MianiBaghatRohri District Sukkur
Block Code: 323010111
Silsa No. 282

11. Manthar Ali Chijjan S/o Gahi Khan Chijjan
CNIC No. 45502-3444078-1
Village AchiyoonQubiyoon Umar Kass Po Rohri
Taluka Rohri District Sukkur
Block Code: 323010103
Silsa No. 631

13. Wajid Ali S/o Ghulam RasoolChijjan
CNIC No. 45502-2999231-3
Village AchiyoonQubiyoon Umar Kass Po Rohri
Taluka Rohri District Sukkur
Block Code: 323010103
Silsa No. 16

15. Muhammad Azeem S/o Muhammad Shahban
CNIC No. 45502-1666591-7
Village AchiyoonQubiyoon Umar Kass Po Rohri
Taluka Rohri District Sukkur
Block Code: 323010103
Silsa No. 588

17. Shams Din S/o PirBux
CNIC No. 45502-8841175-5
Gate 4 Village Faiz Muhammad PO Cement Factory
Taluka rohri District Sukkur
Block Code: 323010105
Silsa No. 648

19. Mushtaque Ali Shah S/o Arbab Shah
CNIC No. 45502-2444820-9
Syed Mohallah Village Long Bhatti PO Cement
Factory Taluka Rohri District Sukkur
Block Code: 323010105
Silsa No. 134

21. Ashique Ali S/o RasoolBux
CNIC No. 45502-9652381-3
Village AchiyoonQubiyoon Abad PO Rohri Taluka
Rohri District Sukkur
Block Code: 323010105
Silsa No. 160

23. PirBux Khaskheli S/o Ameer Bux
CNIC No. 45502-6148316-7
Village Long Bhatti Umar Kass PO Cement Factory
Taluka Rohri District Sukkur
Block Code: 323010105
Silsa No. 650

25. Zahid Hussain Mahar s/o Niaz Hussain
CNIC No. 45402-8136069-5
Village MunshiNajam Din Abro PO Rohri Taluka
Rohri District Sukkur
Block Code: 323030202
Silsa No. 599

27. Shaman Mahesar S/o Rano
CNIC No. 45502-7341913-1
Syed MohallahTaluka Rohri District Sukkur
Block Code: 323010102
Silsa No. 104

12. Muhammad Yameen S/o Ali Hassan
CNIC No. 45502-8736257-1
Village AchiyoonQubiyoon Umar Kass Po
Rohri Taluka Rohri District Sukkur
Block code: 323010103
Silsa No. 290

14. Mohram Ali S/o KhawandBux
CNIC No. 45502-4627515-5
Village AchiyoonQubiyoon Umar Kass Po
Rohri Taluka Rohri District Sukkur
Block Code: 323010103
Silsa No. 23

16. Ashif Ali S/o Muhammad Panah
CNIC No. 45502-8902607-9
Village AchiyoonQubiyoon Umar Kass Po
Rohri Taluka Rohri District Sukkur
Block Code: 323010103
Silsa No. 689

18. Qurban Ali S/o Fateh Ali Alias Fateh
Muhammad
CNIC No. 45502-0843641-3
Village Lal Khan Shar Umar Kass PO Rohri
Taluka Rohri District Sukkur
Block Code: 323010103
Silsa No. 219

20. Sanaullah S/o Daleel Khan SharBalouch
CNIC No. 45502-9720443-7
Village AchiyoonQubiyoon PO Rohri Taluka
Rohri District Sukkur
Block Code: 323010105
Silsa No. 401

22. Mohsin Ali S/o Imdad Ali Bhutto
CNIC No. 45502-1554290-9
Village Shah Khair wand near Cement
Factory Umar Kass PO Loco Shed Taluka
Rohri District Sukkur
Block Code: 323010105
Silsa No. 697

24. Riaz Ahmed S/o Gul Hassan
CNIC No. 45504-6527394-1
MohallahKacha Bandar Road near Hayat
Masjid Sukkur
Block Code: 323010111
Silsa No. 72

26. Ghulam Sarwar S/o Ghulam
QadirMahesar
CNIC No. 45502-7569658-7
Village Bagahi Bhutto PO
RohriSaeedabadTaluka Rohri District Sukkur
Block Code: 323040504
Silsa No. 07

28. DhaniBux S/o Muhammad Laique Bhutto
CNIC No. 45502-2948144-5
Village Ahmed Bhutto PO
RohriSaeedabadTaluka Rohri District Sukkur
Block Code: 3230101 Silsa No. 194

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29. Jameel Ahmed S/o Nazir Ahmed Solangi
CNIC No. 45502-2395348-9
Village SaeedabadSolangiSaeedabadPo Rohri Taluka
Rohri District Sukkur
Block Code: 323010101
Silsla No. 76

30. Perwaiz Ali S/o GhousBux
CNIC No. 45502-0637157-3
Village Laique Khan Jiskani PO Ali Wahan Ali
WahanKacho Taluka Rohri District Sukkur
Block Code: 323010112
Silsla No. 201

31. Khalid Hussain S/o Allah Wasayo Bhutto
CNIC No. 45502-7122320-5
Village Sukhiyo Bhutto PO RohriTaluka Rohri District
Sukkur
Block Code: 323010101
Silsla No. 20

32. Humair Ahmed S/o Khalid Hussain
Bhutto
CNIC No. 45502-9787595-1
Village Bagahi Bhutto Saeedabad PO
RohriTaluka Rohri District Sukkur
Block Code: 323010102
Silsla No. 55

33. Altaf Hussain S/o Kareem Bux Bhutto
CNIC No. 45502-7538659-3
Village Bagahi Bhutto Saeedabad PO Rohri Taluka
Rohri District Sukkur
Block Code: 323010102
Silsla No. 27

34. Bashir Khan S/o Sono Khan
CNIC No. 45504-0226584-5
Village Dib PO RohriTaluka Rohri District
Sukkur
Block Code: 323020707
Silsla No. 433

35. Shabirahmed S/o Allah Jurio
CNIC No. 45504-1141237-7
DoolMohallahBhitai Colony MianiBagatPO
RohriTaluka Rohri District Sukkur
Block Code: 323010111
Silsla No. 530

36. Ghulam Shabir S/o Muhammad Sulaiman
Bhutto
CNIC No. 45502-6080688-1
Village Muhammad Laique PO
RohriMianiBaghatTaluka Rohri District
Sukkur
Block Code: 323010111
Silsla No. 317

37. Ghulam Fareed S/o DhaniBux
CNIC No. 45504-1091913-5
Village Haji BuriroTaluka Rohri District Sukkur
Block Code: 323010114
Silsla No. 981

38. Ghulam Abbas S/o Abdul Rehman
CNIC No. 45502-7409010-7
Village MewoFaqir Mari PO MandoDero Taluka
Rohri District Sukkur
Block Code: 323010107
Silsla No. 348

39. Shoukat Ali S/o Muhammad Hassan jagirani
CNIC No. 45502-3872383-1
Village PathoBagh PO Agha Qadir Dad
MarkeetTaluka Rohri District Sukkur
Block Code: 323010111
Silsla No. 305

40. Ahsan Ali S/o Ahmed Bux Bhutto
CNIC No. 45502-7509803-7
MianiBaghat Village Muhamad Laique
Bhutto PO Rohri Taluka Rohri District Sukkur
Block Code: 323010111
Silsla No. 286

41. IllahiBux S/o Muhammad Laique Bhutto
CNIC No. 45502-1455934-5
Village Muhamad Laique Bhutto PO Rohri Taluka
Rohri District Sukkur
Block Code: 323010111
Silsla No. 293

42. Aqeelahmed S/o Ameer Bux
CNIC No. 45502-5413293-9
Village WariyoKatparMandoDeroTaluka
Rohri District Sukkur
Block Code: 323010107
Silsla No. 143

43. Saeed Ahmed S/o Rahmatullah
CNIC No. 45502-5756822-3
New Goth Ghulam Band Mari PO MandoDeroTaluka
Rohri District Sukkur
Block Code: 323010108
Silsla No. 71

44. Rasheed Ahmed S/o Jameed Ahmed
LodhoPathan
CNIC No. 45502-0859365-7
MandoDeroTaluka Rohri District Sukkur
Block Code: 323010113
Silsla No. 205

45. Muhammad Ramzan S/o Qaisar
CNIC No. 45502-1630169-7
Village Mari PO MandoDeroTaluka Rohri District
Sukkur
Block Code: 323010107
Silsla No. 332

46. TolaRaam S/o Ratan Mal
CNIC No. 45502-9831307-1
Village Sahib Khan JiskaniMandoDero PO
Taluka Rohri District Sukkur
Block Code: 323010112
Silsla No. 107

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47. Imtiaz Ali S/o Gul Bahar
CNIC No. 45502-2231116-9
Village Ghulam Band Mari PO MandoDeroTaluka
Rohri District Sukkur
Block Code: 323010108
Silsa No. 61

48. Ali Khan S/o Mir Muhammad
CNIC No. 45502-3137691-9
Village WariyoKatparMandoDero PO Ali
WahanTaluka Rohri District Sukkur
Block Code: 323010107
Silsa No. 220

49. Shahid Hussain S/o DildarChijjan
CNIC No. 45502-8931823-7
MandoDeroTaluka Rohri District Sukkur
Block Code: 323010113
Silsa No. 56

50. Shahzado S/o QadirBux
CNIC No. 45502-0567565-5
Village Khari Mumbirani PO Ali WahanTaluka
Rohri District Sukkur
Block Code: 323010110
Silsa No. 508

51. Khushi Muhammad S/o Muhammad Siddique
CNIC No. 45502-0820180-5
Soomra Ali WahanTaluka Rohri District Sukkur
Block Code: 323010109
Silsa No. 1352

52. Ghulam Ali S/o Late Ali Muhammad
CNIC No. 45502-0804807-7
Village Sahib Khan JiskaniKatcho Ali Wahan
PO Ali WahanTaluka Rohri District Sukkur
Block Code: 323010112
Silsa No. 44

53. Mashooque Ali S/o Ghulam Hussain Alias Kalo Khan
CNIC No. 45502-3928555-5
MohallahumraniKatcho Ali Wahan PO Ali
WahanTaluka Rohri District Sukkur
Block Code: 323010110
Silsa No. 677

54. Ghulam Shabir s/o Ghulam Haider
CNIC No. 45502-9348404-5
Village Gol Ali Wahan PO Rohri Ali
WahanKatcho Taluka Rohri District Sukkur
Block Code: 323010110
Silsa No. 120

55. Arbelo S/o GulsherMirbahar
CNIC No. 45502-6202757-7
Village Arbab Ali MirbaharMandoDeroTaluka Rohri
District Sukkur
Block Code: 323010113
Silsa No. 503

56. Zulfiqar Ali S/o Ghulam Muhammad
CNIC No. 45502-6154879-5
Village Gol Ali Wahan PO Ali WahanTaluka
Rohri District Sukkur
Block Code: 323010110
Silsa No. 204

59. Manzoor Ahmed S/o Mir Muhammad
CNIC No. 45502-0854840-3
Village MandoDeroTaluka Rohri District Sukkur
Block Code: 323010113
Silsa No. 493

60. Gul Bahar S/o Jaffar
CNIC No. 45502-1179003-5
Village Dhalo Kari Po Rohri Taluka Rohri
District Sukkur
Block Code: 323010110
Silsa No. 637

61. Muhammad Ashraf S/o Muhammad Bux
CNIC No. 45502-6715790-5
Village DalhoGol Ali Wahan PO Ali Wahan Taluka
Rohri District Sukkur
Block Code: 323010110
Silsa No. 355

62. Qurban Ali S/o Shahmir
CNIC No. 45502-0854322-3
Village TandoThati Abad PO
RohriMianiBaghatTaluka Rohri District
Sukkur
Block Code: 323010116
Silsa No. 765

63. Irfan Ali Mirani S/o PirBux
CNIC No. 45502-8579161-5
Village Imdadali Mirani Abad PO Katcho Bandar
Taluka Rohri District Sukkur
Block Code: 323010126
Silsa No. 384

64. Zahid Ali S/o Sadoro
CNIC No. 45502-5613454-1
Kalar Goth PatniTaluka Rohri District Sukkur
Block Code: 323010320
Silsa No. 474

65. Ashique Hussain S/o Allah DiwayoShar
CNIC No. 45502-0887406-1
Village KhananMachi Umar Kass PO RohriTaluka
Rohri District Sukkur
Block Code: 323010320
Silsa No. 148

66. Niaz Ali S/o Muhammad Pariyal
CNIC No. 45204-6653430-3
Village Niaz Ali Mirani Abad PO Agha Qadir
Dad Dalho Taluka Rohri District Sukkur
Block Code: 323010126
Silsa No. 208

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67. Waqar Hussain S/o Ghulam Hussain
CNIC No. 45502-9974264-3
Village TandoThati Taluka Rohri District Sukkur
Block Code: 323010126
Sisla No. 206

68. Amanullah S/o Jarro
CNIC No. 45502-1762913-9
PO Central Jail Colony Abad Taluka Rohri
District Sukkur
Block Code: 323010115
Sisla No. 222

69. Muzafar Ali S/o Ahmed Nawaz
CNIC No. 45502-6403558-5
Village Sharafabad PO Agha Qadir Dad
Markeet Taluka Rohri District Sukkur
Block Code: 323010115
Sisla No. 36

70. Rasool Bux S/o Faqeer Muhammad
CNIC No. 45504-3951246-3
Katcha Badar near Jamia Masjid Bandar Road
Sukkur
Block Code: 323010126
Sisla No. 122

71. Mujahid Hussain S/o Noor Muhammad
CNIC No. 45502-8161935-5
Village Khairo Khan Jiskani Ali Wahan Katcho PO Ali
Wahan Taluka Rohri District Sukkur
Block Code: 323010122
Sisla No. 125

72. Aijaz Ahmed S/o Ramzan
CNIC No. 45502-656462-1
Village Ali Wahan Katcho Ali Wahan PO Ali
Wahan Taluka Rohri District Sukkur
Block Code: 323010109
Sisla No. 973

73. Aqeel Ahmed S/o Liaqat Ali
CNIC No. 45502-7982152-9
Ali Wahan Katcho PO Abasi Mohallah Taluka Rohri
District Sukkur
Block Code: 323010109
Sisla No. 2374

74. Rasheed Mehmood S/o Sultan
Mehmood
CNIC No. 45504-5215747-5
Abbasi Mohallah Ali Wahan Katcho PO Ali
Wahan Rohri District Sukkur
Block Code: 323010109
Sisla No. 2455

75. Imtiaz Ahmed S/o Muhammad Shaffi
CNIC No. 45502-1643098-1
near Taaj Petrol Pump Service Ali Wahan Taluka
Rohri District Sukkur
Block Code: 323010109
Sisla No. 2476

OBJECTIONS ON THE CONSTITUENCIES OF P.S 22, P.S 23 AND P.S 25 OF DISTRICT SUKKUR.

1. P.S 22 of District Sukkur consisting of a total population 365,789.
2. P.S 23 of District Sukkur consisting of a total population 365,622.
3. P.S 25 of District Sukkur consisting of a total population 368,232.
4. Tappedari Circle Rohri from STC Rohri consisting of 65,181 population of P.S 23 of District Sukkur has been illegally broken and included in P.S 25 of District Sukkur.

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5. That Geographic and compactness of both the Constituencies have badly affected. The authorities have not taken into consideration the following section of the law, before delimiting the constituency of P.S 23 and P.S 25, such as;

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.

6. That Union Council No.15 Patni (consisting of 4 wards) have been illegally broken and unlawfully detached 1 ward No.4 full and half from Ward No.3.

7. That Infrastructure and basic facilities to the people shall badly affect in case of the delimitation of the constituency as proposed by the ECP is approved. The Civil facilities like Water, Sewerage, Sanitation and Development schemes shall be frustrated in case the delimitation conducted by the ECP is approved. Even by this impugned delimitation the voter shall be deprived of the said facilities and the people would face great deal of difficulties in their day to day affairs. The convenience of the people and their basic facilities have not been taken care of by the ECP / Delimitation Authorities while proposing the impugned delimitation.

8. The applicants propose the following amendment in delimitation of the constituencies of P.S 22, P.S 23, and P.S 25 of District Sukkur.

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DELIMITATION BY ECP FORM 5

Sr. No.	Constituency	Areas	POPULATION
1	P.S 23	a) Taluka Saleh Pat b) Taluka Rohri excluding the following areas i) M.C Rohri and ii) Tapedar Circle Rohri of Rohri STC of Rohri Taluka	365,622
2	P.S 22	Taluka Pano Akil excluding following Tapedar Circle of Pano Akil STC i) Sundar Belo ii) Panhwari Jagir iii) Nauraja iv) Hingoro	365,789
3	P.S 25	a) Following areas of Taluka New Sukkur i) Bagrji STC ii) Town committee Bagrji iii) Purano Sukkur STC b) Sukkur City Taluka excluding the following area; i) Charge No.1 ii) Charge No.2 iii) Charge No. 1,2,3 & 4 of Charge No.4 c) M.C Rohri of Taluka Rohri d) Tapedar Circle Rohri of STC taluka Rohri e) the following tapedar Circles of Panoakil STC of Taluka Pano Akil; i) Sundar Belo ii) Panhwari Jagir iii) Nauraja iv) Hingoro	368,232

PROPOSED DELIMITATION BY APPLICANTS

Sr. No.	Constituency	Areas	POPULATION
1	P.S 23	a) Taluka Saleh Pat b) Taluka Rohri excluding the following areas i) M.C Rohri ii) TC Arkohar ii) TC Sangrar of STC Sangrar of Taluka Rohri	381,484
2	P.S 22	Taluka Pano Akil including i) TC Arkohar ii) TC Sangrar of STC Sangrar of Taluka Rohri excluding following Tapedar Circle of Pano Akil STC i) TC Sundar Belo ii) TC Panhwari Jagir iii) TC Nauraja iv) TC Hingoro v) TC Shahpur vi) TC Sadhuja vii) TC Nindapur	361,272

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3	P.S 25	a) Following areas of Taluka New Sukkur i) Bagrji STC ii) Town committee Bagrji iii) Purano Sukkur STC b) Sukkur City Taluka excluding the following area; i) Charge No.1 ii) Charge No.2 iii) Charge No. 1,2,3 & 4 of Charge No.4 C) M.C Rohri of Taluka Rohri d) the following tapedar Circles of Panoakil STC of Taluka Pano Akil; i) TC Sundar Belo ii) TC Panhwari Jagir iii) TC Nauraja iv) TC Hingoro v) TC Shahpur vi) TC Sadhuja i) TC Nindapur	356,887
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9. That 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. The delimitation of the constituencies of National Assembly shall not be affected by the above proposed changes.
10. 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.

Authorized Person / Attorney
Of the applicants