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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 KHAIRPUR**

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. Bahadrur Ali s/o Ali Gul Phulpoto
R/o Village Koro Khan Phulpoto UC Khanpur
Taluka & District Khairpur PS-32
CNIC No. 45203-3951122-5
2. Atta-ur-Rehman s/o Abdul Rasool Phulpoto
R/o Village Koro Khan Phulpoto UC Khanpur
Taluka & District Khairpur PS-32
CNIC No.45203-8583504-1
3. Sohrab Maitlo s/o Muhammad Saleh Maitlo
R/o Village Shah Hussain, UC Khanpur,
Taluka & District Khairpur PS-32
CNIC No.45203-9462720-7
4. Liakat Ali s/o Ali Dur Phulpoto
R/o Village Kouro Phulpoto,
Taluka & District Khairpur PS-32
CNIC No.45203-8832169-1
5. Imdad Hussain s/o Habibullah Veesar,
r/o Taluka Thari Mirwah, District Khairpur P.S 29
CNIC No.45206-1771433-7
6. Shaukat Ali s/o Muhammad Ali Khan Junejo
R/o Village Khanpur, UC Khanpur,
Taluka & District Khairpur PS-32

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CNIC No.45203-4061383-7

7. Muahmmad Yaseen s/o Ghulam Rasool Chang,
R/o Taluka Faiz Ganj P.S 28
CNIC No. 45201-1467775-1
8. Syed Jeeal Shah s/o Syed Ghulam Muhiyuddin Shah
@ Lal Shah Jilani r/o village Dargah Hussain Shah,
CNIC No. 45201-4490387-7, P.S 28
9. Faqeer Sher Ali s/o Faqeer Mola Bux Detho
R/o Village Dargah Loung Faqeer (PS-27)
CNIC No.45203-5042649-9
10. Mashooq Ali s/o Baghio Khan Noonari
R/o Village Bakhshan Noonari (PS-27)
CNIC No.45203-6246009-7
11. Syed Khadim Hussain Shah s/o Syed Ghulam Abbas Shah
r/o Village Rahuja Taluka Kingri District Khairpur
P.S 32 CNIC No. 45204-2498956-3
12. Asghar Ali s/o Ghulam Haider Hondal
R/o Village Chaudhry Ghulam Haider Hondal
PS-31 CNIC No.45203-4109678-3

OBJECTIONS ON THE CONSTITUENCIES OF District Khairpur

1. That the total population of District Khairpur as per the census report is 24,05,523.
2. That there are seven Provincial and three National seats allocated to District Khairpur by the Election Commission of Pakistan on the basis of census population.
3. That the delimitation authority without any notice and information had proposed fresh delimitation of all the constituencies in District Khairpur without complying with the basic requirements of law.
4. The administrative unit boundaries of Tappedari Circle of Tappo Bhurgari of P.S 26 M.C Taluka Khairpur have been broken under the present delimitation proceedings.
5. That Tappa Circle Bhurgari (Deh Bhurgri) has been broken into two portions illegally, one part is placed in P.S 26 while the other part is

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kept in P.S 27 Khairpur, As per the Rules and law, the Revenue Unit of Tapedari Circle (Deh) cannot be disturbed. The people would get frustrated due to inconvenience in getting their record of rights of the Agri. Land as well seeking development schemes. The Headquarter of Taluka Kotdiji would be as far as 20 KM away from Deh Bhurgri.

6. That the population of Deh Bhurgri has not been taken care of nor the same is taken into consideration while carving out the boundaries of P.S 26 and P.S 27.
7. The delimitation of District Khairpur was not started / carried out from the Northern end of the District, rather a zigzag and anti clock boundaries have been carved out in District Khairpur. The proposed maps of NA are also attached.
8. That Tappa Circle Shadi Shaheed of Taluka Khairpur has also been taken away in P.S 27, resulting which the people of the area would face difficulties and inconvenience, as the people would have to cross M.C Khairpur in order to reach at town committee Kotdiji. Though the Tappa shadi shaheed is within 2 KM distance of M.C Khairpur.
9. That Tappa Circle Khanpur and Tappa Circle Kouro Phulpoto both are located adjacent to the Municipal Committee P.S 26 Khaipur-I (within 2KM Kouro Phulpoto), and presently they both are shifted to P.S 32 Khairpur-VII. The convenience of the people was very much affected by the newly delimitation in order to favour one political party (PML-F). Hence the same is not sustainable under the law.
10. The boundaries of Constituency P.S 26 Kharipur-I have been badly disturbed in as much as its parts have been included in three delimited constituencies viz. (1). P.S 27, (2). P.S 31, and (3). P.S 32. The authorities have not taken into consideration the public convenience, homogeneity in the creation of constituencies and the geographic areas of Khairpur Taluka.
11. The boundaries of P.S 28 Khairpur III, consisting of Taluka (a) Nara (b) Faiz Ganj. There is a big NARA Water Canal flowing in Taluka

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NARA, whereas no any facility of communication / road to reach at one or the other end and the public convenience has not been considered. The people would get frustrated on account of the illegal delimitation of the boundaries of P.S in District Khairpur.

12. The applicants proposed the following amendments / changes in the delimitation of the constituencies, which shall fulfill all the laid down conditions of the section 20 of the Election Act, 2017.

Proposed by ECP			Proposed by Applicants		
1.	P.S 26 Khairpur -I	357,593	Taluka Khairpur excluding the areas 1.STC Kouro Phulpoto 2.STC Khairpur (a)Tapedari Circle Bhurgri (b) Tapedari Circle Shaadi Shaheed and (c) Tapedari Circle Khanpur	Proposed delimitation attached Annexure A	325,489
2	P.S 27 Khairpur -II	351,884	Taluka Kotdiji excluding the areas a.Tapedari Circle Jhando Mashaiq of STC Jhando Mashaiq including 1.Bhurgri 2 Shadi Shaheed	Proposed delimitation attached Annexure B	342,063
3	P.S 28 Khairpur -III	355,238	Taluka Nara & Taluka Faiz Ganj excluding the areas a.Akri b.Kandiari c.Wahleer of STC Kandiari	Proposed delimitation attached Annexure C	355,866
4	P.S 29 Khairpur- IV	331,540	Taluka Mirwah excluding the areas a.Town committee Setharja b. T.C Chhutto Wandier of khuda buksh kubar @ Setharja STC c. T.C Deparja of Khuda buksh Kubar @ Setharja d.Akari e.Kandiari c.Wahleer of STC of Faiz Ganj Taluka	Proposed delimitation attached Annexure D	354,626
5.	P.S 30 Khairpur- V	346,068	a.Taluka Sobho Dero b. T.C of Khuda Buksh Kubar of STC of Mirwah Taluka c.Chhutto Wandiar e.Deparja f.Town committee Setharja of Taluka Mirwah g. T.C of Jhando Mashaiq of STC of Jhando Mashaiq of Taluka Kotdiji	Proposed delimitation attached Annexure E	346,031
6.	P.S 31	339,556	a.Taluka Gambat	Proposed	351,987

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	Khairpur-VI		b. T.C of Ahmed Pur STC of Taluka Kingri i.Kolab Jeal ii.Saidi iii.TC Kouro Phulpoto 1.Tando Masti 2. Wasan of Tando Masti	delimitation attached Annexure F	
7.	P.S 32 Khairpur-VII	323,684	a.Taluka Kingri excluding the areas 1.Kolab Jeal 2.Saidi B. T.C Khanpur of STC Khairpur of Taluka Khairpur C. Part of T.C of Kouro Phulpoto; i.Tando Nazar Ali ii.Mangi iii.Kouro Phulpoto of Taluka Khairpur	Proposed delimitation attached Annexure G	329,749

NATIONAL ASSEMBLY SEATS
DELIMITATION BY ECP

NA-208		
1.	(a) Khairpur Taluka	(a) 440,752
2.	and (b) Kotdiji Taluka Of district Khairpur	(b) 348,899
	Total	789,651

PROPOSED BY APPLICANTS

NA-208		
1.	(a) Khairpur Taluka	(a) 440,752
2.	and (b) Kingri Taluka Of district Khairpur	(b) 340,218
	Total	780,970

DELIMITATION BY ECP

NA-209		
1.	(a) Mirwah Taluka; (b) Faiz Ganj Taluka; (c) Nara Taluka; (d) Tapedar Circles of Ranupur STC Sobhodero Taluka:- i) Gadeji ii) Rasoolabad iii) Tunia of district Khairpur	(a) 352,491 (b) 224,004 (c) 160,985 (d) 18,749 (e) 15,097 (f) 6,544
	Total	777,870

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PROPOSED BY APPLICANTS

NA-209		
1.	(a) Kotdiji Taluka;	(a) 348,899
	(b) Nara Taluka;	(b) 86,026
	(i) Sorah & (ii) Sikandarabad	
	(c) Gambat Taluka	(c) 263,746
	(d) Taluka Thari Mirwah	(d) 60,969
	(e) Sobhodero Taluka:-	(e) 14,103
	i) Madd	(f) 20,079
	ii) Thatti	(g) 25,225
	iii) _____	
	of district Khairpur.	
	Total	819,047

DELIMITATION BY ECP

NA-210		
1.	(a) Gambat Taluka	(a) 263,746
	(b) Kingri Taluka	(b) 340,218
	(c) sobhodero Taluka excluding the following Tapedar circles of Ranipur STC	(c) 234,038
	(i) Gadeji	
	ii) Rasoolabad	
	iii) Tunia	
	of District Khairpur	
	Total	838,002

PROPOSED BY APPLICANTS

NA-210		
1.	(a) Faiz Ganj Taluka	(a) 224,004
	(b) Nara Taluka	
	(i) Tapedar Circle Pir Abdul Qadir Shah	(b) 74,969
	(c) Taluka Mirwah	(c) 215,021
	(c) Sobhodero Taluka excluding the following	(d) 215,021
	i) Madd	
	ii) Thatti	
	iii) _____	
	of district Khairpur of District Khairpur	
	Total	805,506

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13. That this will be in the interest and convenience of the people, compactness of the areas of the Taluka and would further ensure homogeneity in the creation of the constituencies if the proposed amendments given by the applicants are considered and agreed upon by this Honourable Court.
14. 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.
15. 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