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**BEFORE THE ELECTION COMMISSION OF PAKISTAN,  
ISLAMABAD**

Representation No:                      of 2018

To,

The Secretary,  
Election Commission of Pakistan,  
Islamabad.

**MEMORANDUM OF REPRESENTATION TO THE  
PRELIMINARY DELIMITATION IN RESPECT OF THE  
CONSTITUENCIES NA-225, NA-226, NA-227 & OF  
HYDERABAD DISTRICT**

The Petitioner above-named most respectfully submits as under:-

1.           The Petitioner is a voter in PS-63 (Hyderabad-II, comprise of Taluka Hyderabad Rural) & NA-225 (HYDERABAD-I), and has contested Local Bodies Election in the year 2015 for number of Union Councils in Taluka Hyderabad Rural of District Hyderabad. Accordingly, the Petitioner is directly aggrieved by Preliminary Delimitation in respect to the area, therefore, hereinafter proposes amendments in Preliminary Delimitation of constituencies of District Hyderabad, keeping in view the principles of delimitation i.e. compactness, contiguity, territorial unit homogeneity and population as encapsulated in Election Act, 2017. Copy of voter's list and CNIC is enclosed as **Annex A & A-1**.  
**NB: Proposal adjusts the population as required by the ECP**

2.           The Preliminary Delimitation is squarely against the statutory Principles of Delimitation, as enshrined in Section 20 of the Election Act, 2017, and the criteria laid down in the dictums by the Supreme Court of the Country. Delimitation. Said Preliminary Delimitation in respect to District Hyderabad seems unbalanced and discriminatory, which in-turn leave an impression of gerrymandering.

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3. Following is the proposal of the Petitioner on Preliminary Delimitation report for NA-225 (HYDERABAD-I) comprising of PS-63 (Hyderabad-II) & PS-62 (Hyderabad-I), is spelt out as under :-

**Proposed areas inclusion for NA-225:-**

- i) (a) Tepedar Circle Kathri of Hatri STC, (b) Tapedar Circle Hatri of Hatri STC and, (c) Tapedar Circle of Additional Kathri STC of District Hyderabad. Said mentioned areas may be included in PS-63 on various grounds amongst others, :- (i) said mentioned areas are geographically rural areas and their inclusion in PS-62, which is primarily an urban area, in-turn, would lead to administrative neglect and budget confinements as well, (ii) cognate factor holds water over here in terms of the fact that exclusion of said area might lead to a law and order situation and, thus disturbing social fabric of the society (iii) administratively said areas are part of District Council Hyderabad (Hyderabad Rural Taluka) (iv) Public convenience also advocates the inclusion of said area in PS-63.
- ii) Town Committee Husri may also be included in PS-63, on various grounds:- (i) Town Committee Husri comes under Tapedar Circle Husri, which in-turn consists of 03 dehs (i) Alni (ii) Panhwari (iii) Kathro. Evident Gerrymandering in this context exists by shifting Town Committee Husri (part of T.C. Husri) in Latifabad Taluka, which normally otherwise would have been a full shift of T.C. Husri. (ii) said area has remained historically/geographically in PS-63 (formerly known as PS-50).

**TABLE**

NA-225 Hyderabad I	Hyderabad (Rural) Taluka including the following areas:	
	i) Town Committee Husri	21,073
	ii) Tapedar Circle Kathri of Hatri STC,	19,290
	iii) Tapedar Circle Hatri of Hatri STC and,	35,566
	iv) Tapedar Circle of Addl. Kathri STC of District Hyderabad.	19,519
	v) M C Tando Jam	78,989
	vi) TC Addl: Husain Khan Thoro	11,684
	vii) TC Addl: Tando Hyder	13,444
	viii) TC Addl: Tando Qaisar	11,171
	ix) TC Husain Khan Thoro	18,333
	x) TC Tando Hyder	40,893
	xi) TC Tando Qaisar	24,992
	xii) TC Tando Jam	33,139
	xiii) TC Addl: Husri	15,651
	xiv) TC Husri	10,058
Total Proposed Population		353,802

Hyderabad I	a) Qasimabad Taluka excluding Census Charge No:2 of Hyderabad Cantonment(Part) of Taluka Qasimabad	299,581
	b) the following areas be included:-	
	i) Census	

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	Charge No: 17 of Hydera bad City Taluka	21,098
ii)	Census Charge NO: 18 of Hyderabad City Taluka	
iii)	Census Circle No: 1,2,3&5 of Charge No: I of Latifabad Taluka	29,744     31,274
Total Proposed Population		381,697


**Proposal for NA-225, Hyderabad-I, is same as the case of PS-62 and PS-63**

N.A 225 Hyderabad I	a) Including Proposed P.S 62 Hyderabad I of Taluka Qasimabad.	381,697
	b) Including Proposed P.S 63 Hyderabad II of Taluka Hyderabad Rural.	353,802
Total Proposed Population		735,499

**Proposed areas inclusion for PS-62**

Following areas may be included to PS-62 on below-mentioned grounds:-

- a) Circle No.1, 2, 3, 5 of Census charge No.1 of Taluka Latifabad, Hyderabad.
- b) Census Charge No.17 & 18 of Taluka City, Hyderabad

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- i) Said areas principally comprise of Sindhi linguistic community and therefore on cognate grounds need not to be disturbed and merging it with the area (i.e. PS-65 and PS-66 respectively) which mainly comprises of Urdu Community and historically rivalry has been seen between both communities, therefore merging it with PS-65 and PS-66 would lead to in-orderly situation. (ii) historically it has also remained part of PS-62 (formerly known as PS-47) (iii) said areas are geographically compact as well and therefore deserve to remain in PS-62.

4. Accordingly, the Proposal for the NA-226 (Hyderabad-II) comprising of PS-64 & 65 is as follows:

**Proposed areas inclusion for NA-226**

Following areas may be included to PS-64 and be excluded from PS-63 on below-mentioned grounds:-

- a) T.C. Add. Tando Fazal
- b) T.C. Tando Fazal
- c) T.C. Moolan
- d) T.C. Add. Moolan
- e) T.C. Seri.

i) As far as public convenience and physical communication i.e. lay-out of road network and allied infrastructure are in question, said areas are well-connected through main road of District Hyderabad to District Tando Muhammad Khan, therefore, general population would reach out to administrative offices/units conveniently through mentioned road/network rather than what would exist as a result of newly proposed delimitations by the ECP. Further, Public representatives and voters would remain disconnect/distant owing to said reason of road network (inaccessibility) (ii) said areas shares approximately 15 kilometers of physical boundaries with Taluka Latifabad, PS-64 (formerly known as PS-49) (iii) population has already been and still is resident of PS-64, therefore such a dismantling would only lead to a further chaotic Political scenario and administrative failure. (iv) Aforementioned areas were formerly part of Provincial Assembly Seat of Tando Muhammad Khan District.

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**Proposed Table**

NA 226 Hyderabad II	a) the following areas of Latifabad Taluka	
	i) Census Charge No: 19	32,259
	ii) Census Charge No: 20	31,990
	iii) Census Charge No: 21	47,116
	iv) Census Charge No: 25	16,714
	v) Census Charge No: 26	39,805
	vi) Census Charge No: 27 and	24,630
	vii) Census Circle No: 03,04,05 and 06 of Charge No: 03(Part)of Hyderabad Cantonment and,	31,287
	viii) Census Charge No: 26 Hyderabad City Taluka of District Hyderabad.	34,328
	b) The following areas of Taluka Hyderabad (rural) be included:	
	i) T.C Addl.Tando Fazal	16,318
	ii) T.C Tando Fazal	17,503
	iii) T.C Moolan	19,712
	iv) T.C Addl.Moolan	24,509
	v) T.C Seri	34,926
Total:	371,097	

P.S 65 Hyderabad IV	a). The following Census Charges of Latifabad Taluka:	
	i. Census Circle No.04 & 06 of Census Charge No: 1	13,299
	ii. Census Charge No: 2	18,119
	iii. Census Charge No: 3	22,286
	iv. Census Charge No: 4	9,397
	v. Census Charge No: 5	22,213
	vi. Census Charge No: 6	33,299
	vii. Census Charge No: 7	22,392
	viii. Census Charge No: 8	23,823
	ix. Census Charge No: 9	25,886
	x. Census Charge No: 10	27,427
	xi. Census Charge No: 11	17,344
	xii. Census Charge No: 12	30,882
	xiii. Census Charge No: 13	15,172
	xiv. Census Charge No: 14	18,174
xv. Census Charge No: 15	15,451	

	xvi. Census Charge No: 16 Of District Hyderabad	19,787
	b). The following Census Charges of Hyderabad City Taluka including:	
	i). Census Charge No:17	17,894
	ii). Census Charge No:18	12,009
	Total:	364,854

**Proposed areas inclusion for NA-226**

Following areas may be included to PS-65 and be excluded from PS-64 on below-mentioned grounds:-

- a) Census charge No.17 & 18 of Taluka Latifabad.
- i) Said areas are within boundaries of PS-65, (ii) it is surprising to note that even though census charge No.16 of Taluka Latifabad is in proximity/close to PS-64 but Charge No.17 & 18, which are distant were included in PS-64 and therefore gerrymandering is inevitably evident (iii) geographically close to PS-65. (iv) Public convenience with respect to road-network.

**Proposal for NA-226, Hyderabad-I, is same as the case of PS-64 and PS-65**

N.A 226 Hyderabad II	a) Including Proposed P.S 64 Hyderabad-III of Taluka Latifabad &	
	i) T.C Addl.Tando Fazal ii) T.C Tando Fazal iii) T.C Moolan iv) T.C Addl.Moolan v) T.C Seri of Taluka Hyderabad (Rural).	371,097
	b) Including Proposed P.S 65 Hyderabad-IV of Taluka Latifabad.	364,854
	Total:	735,951

5. Consequently, the Proposal for NA-226, Hyderabad-III, comprising of PS-66 and PS-67, which is spelt out as under:-

**Proposed areas inclusion for NA -227**

Following areas may be included to PS-66 and be excluded from PS-64, on below-mentioned grounds:-

- a) Census Charge No: 22, 23 & 24 of Taluka Latifabad
  - i) Previously was part of PS-66 ii) Public convenience for voters of the area as central point of City is in proximity with PS-66 rather PS-64.

NA 227 Hyderabad III	a)The following census Charges of Hyderabad City Taluka:	
	i. Census Charge NO: 15	26,126
	ii. Census Charge NO: 16	33,990
	iii. Census Charge No: 19	15,952
	iv. Census Charge No: 20	17,573
	v. Census Charge No: 21	9,046
	vi. Census Charge No: 22	25,205
	vii. Census Charge No: 23	13,055
	viii. Census Charge No: 24	11,044
	ix. Census Charge No: 25	17,952
	x. Census Charge No: 27	12,515
	xi. Census Charge No: 28	20,696
	xii. Census Charge No: 29	15,494
xiii. Census Charge No: 30	21,859	
b). The following Census Charges of Hyderabad Cantonment of Hyderabad City Taluka		
i. Census Charge No: 1 (Part)	21,389	
ii. Census Charge No: 2 (Part)	16,965	
and		
c). Census Charge No: 2(Part) Hyderabad Cantonment of Qasimabad Taluka.	5,318	
d). Census Charge No: 1 (Part) of Hyderabad Cantonment of Latifabad Taluka and	11,111	
e) Census Circle No: 1 and 2 of Charge No: 3 ( Part) of Hyderabad Cantonment of Taluka Latifabad of District Hyderabad.	13,720	
f). The Following a Census Charge of Taluka Latifabad are included:		

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	i. Census Charge No:22	27,643
	ii. Census Charge No:23	24,594
	iii. Census Charge No:24	20,514
	Total:	381,761

**No Proposal/Objection on PS-67, therefore, as notified by ECP**

NA 227 Hyderabad III	The following Census Charges of Latifabad Taluka:	
	i) Census Charge No: 1	15,286
	ii) Census Charge No: 2	33,079
	iii) Census Charge No: 3	64,045
	iv) Census Charge No: 4	29,721
	v) Census Charge No: 5	23,526
	vi) Census Charge No: 6	17,244
	vii) Census Charge No: 7	20,728
	viii) Census Charge No: 8	28,185
	ix) Census Charge No: 9	22,380
	x) Census Charge No: 10	21,729
	xi) Census Charge No: 11	15,888
	xii) Census Charge No: 12	14,116
	xiii) Census Charge No: 13	20,023
	xiv) Census Charge No: 14	21,918
<b><i>Remains same as notified by ECP in Preliminary Delimitation.</i></b>		
	Total:	347,868

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**Proposal for NA-227, Hyderabad-III, is same as the case of PS-66 and PS-67**

N.A 227 Hyderabad III	a) Including Proposed P.S 66 Hyderabad-V of Taluka City Hyderabad.	381,761
	b) Including ECP Proposed P.S -- 67 Hyderabad--VI of Taluka City Hyderabad .	347,868
	Total:	729,629

NB: Proposed Map for all Constituencies of District Hyderabad attached as **ANNEXURE-B**

6. The impugned Preliminary delimitation does not maintain the general principles of delimitation i.e. geographically compact areas, existing boundaries, physical features, facilities of communication, cognate factors in order to ensure harmony whilst creating the constituencies.
7. The above-mentioned proposal is suggested keeping in mind the principles of Delimitation and welfare of the People of District Hyderabad, and therefore no bias is shown whilst suggesting the same.
8. The Petitioner crave permission of this August Commission to allow the Petitioner to urge any other ground at the time of hearing of memorandum of representation.

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**PRAYER**

In view of above circumstance, it is mostly respectfully prayed that this Hon'ble Authority/Commission may kindly be pleased to recall the impugned Preliminary delimitation of the District Hyderabad and delimit the constituencies with regard to attached map, and any other measure/order deemed fit may also be passed in the favour of the Petitioner in the interest of Justice.



PETITIONER

Sohail Khan S/O Khawand Bux alias  
Ghulam Muhammad, By caste Jahejo,  
R/O Village Haji Abdul Karim Jahejo,  
P O Raheemabad, Detha Taluka & District Hyderabad  
Cell:- 03332667107

**VERIFICATION**

I, Sohail Khan S/o Khawand Bux R/o: Hyderabad do hereby state on oath that the contents of the above Memorandum of Representation are true and correct to the best of my knowledge and belief, and no part of it is false and nothing material has been concealed therein.



PETITIONER

HYDERABAD

DATED: 02-04-2018