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IN THE ELECTION COMMISSION OF PAKISTAN AT ISLAMABAD

REPRESENTATION NO. ___ OF 2018

In the matter of Delimitation of Constituencies:

Mohammed Saleh Rahpoto,
CNIC No. 41206-9475198-3
Resident of Village Wadiyoon Manhyoon,
Tapal Ghar Bhan Saeedabad, Tehsil Sehwan.

Mohammed Saleh Rahpoto
02/04/2018
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.....PETITIONER

REPRESENTATION UNDER SECTION 21 OF THE ELECTIONS ACT, 2017
READ WITH RULE 12 OF THE ELECTION RULES 2017 AGAINST THE
DELIMITATION OF PROVINCIAL ASSEMBLY CONSTITUENCIES PS-80, PS-81
& PS-82 OF DISTRICT JAMSHORO, SINDH

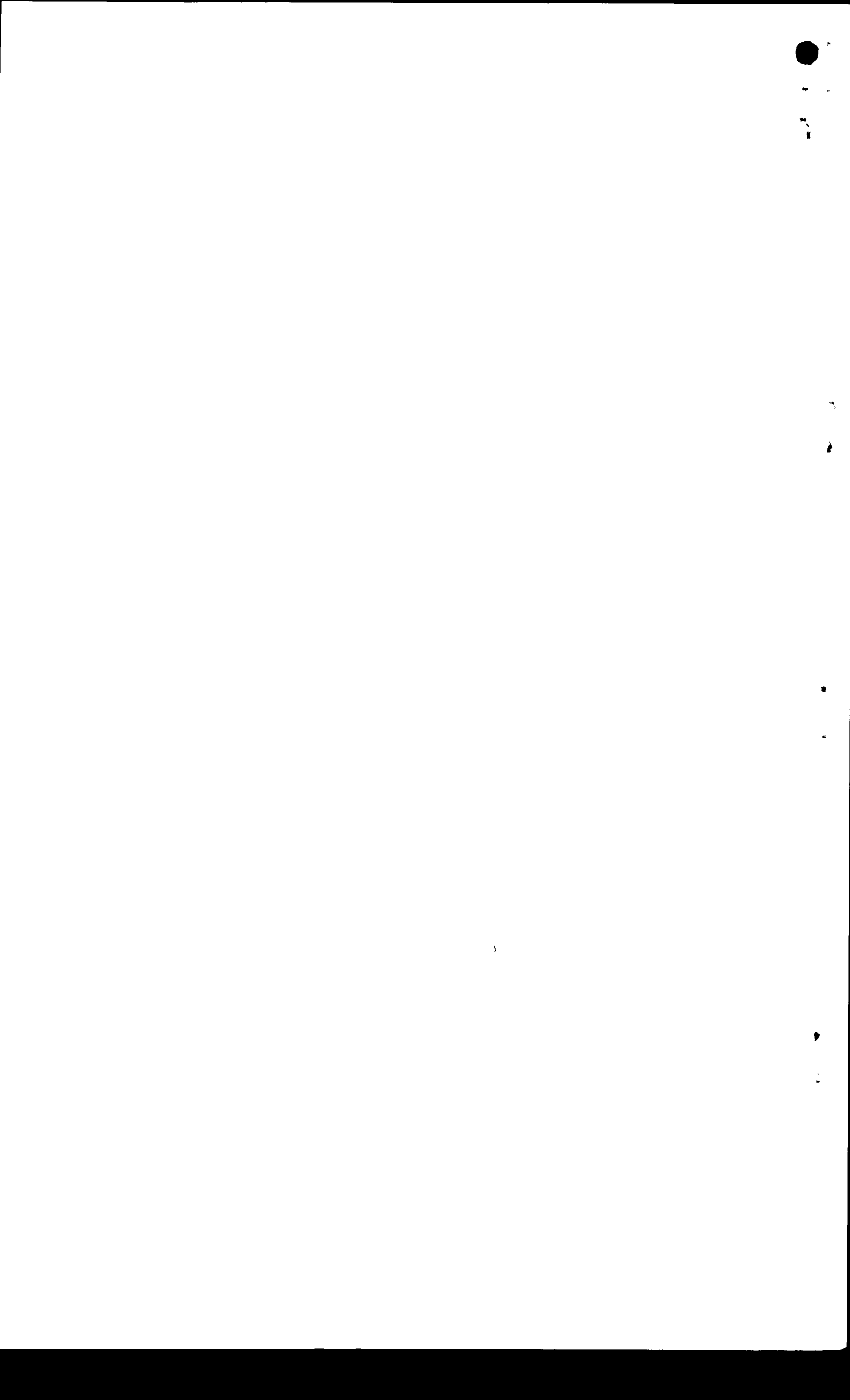
Being aggrieved and dis-satisfied with the delimitation proposal dated 05.03.2018 notified by ECP for the Provincial Assembly seats of District Jamshoro, the Petitioner submits the instant Representation on the following facts & grounds:

GROUND:

1. The delimitation proposed by the election commission is presented in the following table:

Constituency	Area	Population
PS-80 Jamshoro-I	Sehwan Taluka TC Sann, Manjhand Taluka Manjhand STC w/o Tapedar Circle Lakhri Town Committee, Manjhand Total	269,291 12,745 56,899 8,467 347,402
PS-81 Jamshoro-II	Thano Bhula Khan Taluka Bada STC, Kotri TC Jamshoro, Kotri Taluka Unerpur STC, Manjhand Taluka Tapedar Circle Lakhri, Manjhand STC Total	145,450 85,033 34,420 55,242 7,487 327,632
PS-82 Jamshoro-II	Kotri Taluka w/o Bada STC & TC Jamshoro Total	 318,108 318,108

2. As can be seen, PS-80 has been allocated a population of 347,402. This constituency comprises primarily Sehwan Taluka. As the population of Sehwan Taluka is 269,291, some area has to be added to it. The natural area to be added is Taluka Manjhand. However, the population to be added should be just enough to comply with the rules that no two constituencies should have a difference of more than 10%. If this rule is followed, the population of any constituency in District Jamshoro should be at least 314,000. So the population to be added from Taluka Manjhand into PS-80 should not be more than 45,000.



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3. That Taluka Manjhand is a part of District Jamshoro, which as per the notified Census results, has a population of 140,840 people. As per the preliminary proposal regarding delimitation of constituencies published by the ECP, Taluka Manjhand has been divided into two (02) parts. While one part of Manjhand having a population of 78,111 (55% of the entire Taluka) has been made part of proposed PS-80 (previously PS-73), the remaining part with a population 62,729 (44.50% of the entire Taluka) has been made part of the proposed PS-81 (previously PS-72).
4. Manjhand has remained part of Kotri Taluka, and Manjhand as a Taluka been carved out of Kotri. In all of the previous elections, major portion of Manjhand & Kotri were part of the same Provincial Assembly constituency.
5. That as per the proposal of the ECP, almost half of Taluka Manjhand has been made part of PS-81, which also includes Taluka Thano Bhula Khan. There is no physical connection between Taluka Manjhand & Thano Bhula Khan and both the Talukas are naturally divided by mountains and there is no road directly connecting the two Talukas.
6. That keeping in view the principle of public convenience as well as geographical, historical and physical contiguity, the major portion of Taluka Manjhand should be part of PS-82 and the remaining portion should be added into PS-80 (in order to complete the population numbers for PS-80) and consequently renumbered. The exact bifurcation is stated in the proposal contained in Para 7 of this representation.

PROPOSAL:

7. That for the reasons that have been highlighted above, the following proposal is submitted for the approval of ECP:

No. and Name of Constituency	Extent of Constituency	Population
PS-80 Jamshoro-1	a) Sehwan Taluka	269,291
	b) Town Committee Sann of Manjhand Taluka	12,745
	c) The following TCs of Manjhand STC of Taluka Manjhand	
	(i) Laki TC	12,209
	(ii) Chachar TC	10,067
	(iii) Sann TC	10,586
	Total :	314,898
PS-81 Jamshoro-II	a) Taluka Manjhand excluding: (i) Town Committee Sann of Manjhand Taluka (ii) The following TCs of Manjhand STC of Taluka Manjhand <ul style="list-style-type: none">• Laki TC• Chahchar TC	95,233



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	• Sann TC	85,033
	b) STC Bada of Taluka Kotri	101,134
	c) MC Kotri	34,420
	d) Town Committee Jamshoro	16,431
	e) Kotri TC of STC Kotri	
	Total :	332,251
PS-82 Jamshoro III	a) Taluka Thano Bula Khan	145,450
	b) MC Bolhari	158,224
	c) Following TC of STC Kotri of Taluka Thano Bula Khan:	
	(i) Bolhari TC	40,491
	(ii) Raheer TC	902
	(iii) Vee TC	926
	Total :	345,993

(Copy of Map proposed by the Applicant is enclosed as Annexure "A")

8. That the variation between the seats as proposed above with the highest and lowest population is 8.99% which is within the limit contained in the applicable laws. Moreover, the above arrangement comprises of areas, which are geographically contiguous with the best possible communication network amongst them. Furthermore, it is also closest to the previous delimitation done in the year 2002 thus facilitating the voters & more importantly electoral process in the respective constituencies.

PRAYER:

In light of the above, the Hon'ble Election Commission of Pakistan may be pleased to set aside the preliminary delimitation of constituencies of Provincial Assembly of Sindh in respect of District Jamshoro and accept the proposal submitted as hereunder (**Annexure A**) as final list of Provincial Assembly constituencies for District Jamshoro, Sindh.

DATED: 02.04.2018

VERIFICATION

I, Mohammed Saleh Rahpoto S/o Mohammed Pinjal, adult, Muslim & resident of Village Wadiyoon Manahyoon, Taluka Sehwan, District Jamshoro, do hereby state on oath that whatever is stated hereinabove is true and correct to the best of my knowledge and belief.

Verified at Islamabad on the __ day of April, 2018

PETITIONER

DEPONENT

ADVOCATE

ANNEXTURE

Map of Delimitation Proposed by Petitioner (Annexure A)

Copy of CNIC (Annexure B)

Copy of Voter Extract (Annexure C)

Vakalatnama (Annexure D)

