

M 02/07/2018 (1)

BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN

Representation No. of 2018

Muhammad Sadiq  
S/o. Mir Naseer Khan Khoso  
Muslim, adult  
R/o. Village Madadpur P.O Bahadurpur,  
Sub Division Thull,  
District Jacobabad .....Petitioner

Versus

Delimitation Committee for  
Province Sindh.....Respondent

OBJECTION/REPRESENTATION UNDER RULE 12 OF THE  
ELECTION RULES 2017 AGAINST DELIMITATION OF  
CONSTITUENCIES OF PS-1,2,3 DISTRICT JACOBABAD

The Petitioner respectfully submits as under:-

- 1) That I am permanent resident of Village Madadpur which is situated at Deh Madadkhoso, Tapa Zangipur of STC Bahadurpur, Sub Division Thull, District Jacobabad.

(Copy of NIC is enclosed herewith and annexured as "A")

- 2) That I am registered voter of Deh Madadkhoso, Tapa Zangipur of STC Bahadurpur, Sub Division Thull, District Jacobabad.



11/02/2019 (3)

(Copy of Voter List Certificate is enclosed herewith and annexured as "B")

- 3) That District Jacobabad is divided into Three Sub Divisions namely
  - I. Jacobabad
  - II. Thull
  - III. Garhi Khairo
- 4) That before current delimitation/demarcation of District Jacobabad it had Three Provincial Constituencies which were called as PS-13(Now PS-3), Ps 14(Now PS-1) and PS15(Now PS-2) and my Constituency was PS-14 comprising Jacobabad City and its vicinity including entire STC Bahadurpur and my Tapa Zangipur is part of STC Bahadurpur.
- 5) That after current Census of 2017, District Jacobabad was given One seat for National Assembly and Three seats for Provincial assembly as per quota of its population which is total 10,06,297 and the Election Commission commenced delimitation of entire country including my District Jacobabad.
- 6) That in Preliminary Report Delimitation committee has added Tapa Zangipur into PS-3 (previously called as ps-13) disconnecting it from its STC Bahadurpur whereas STC Bahadurpur is in PS-1 (previously called as PS-14) .

(Copy of ECP Map is enclosed herewith and annexured as "D")



## GROUNDS

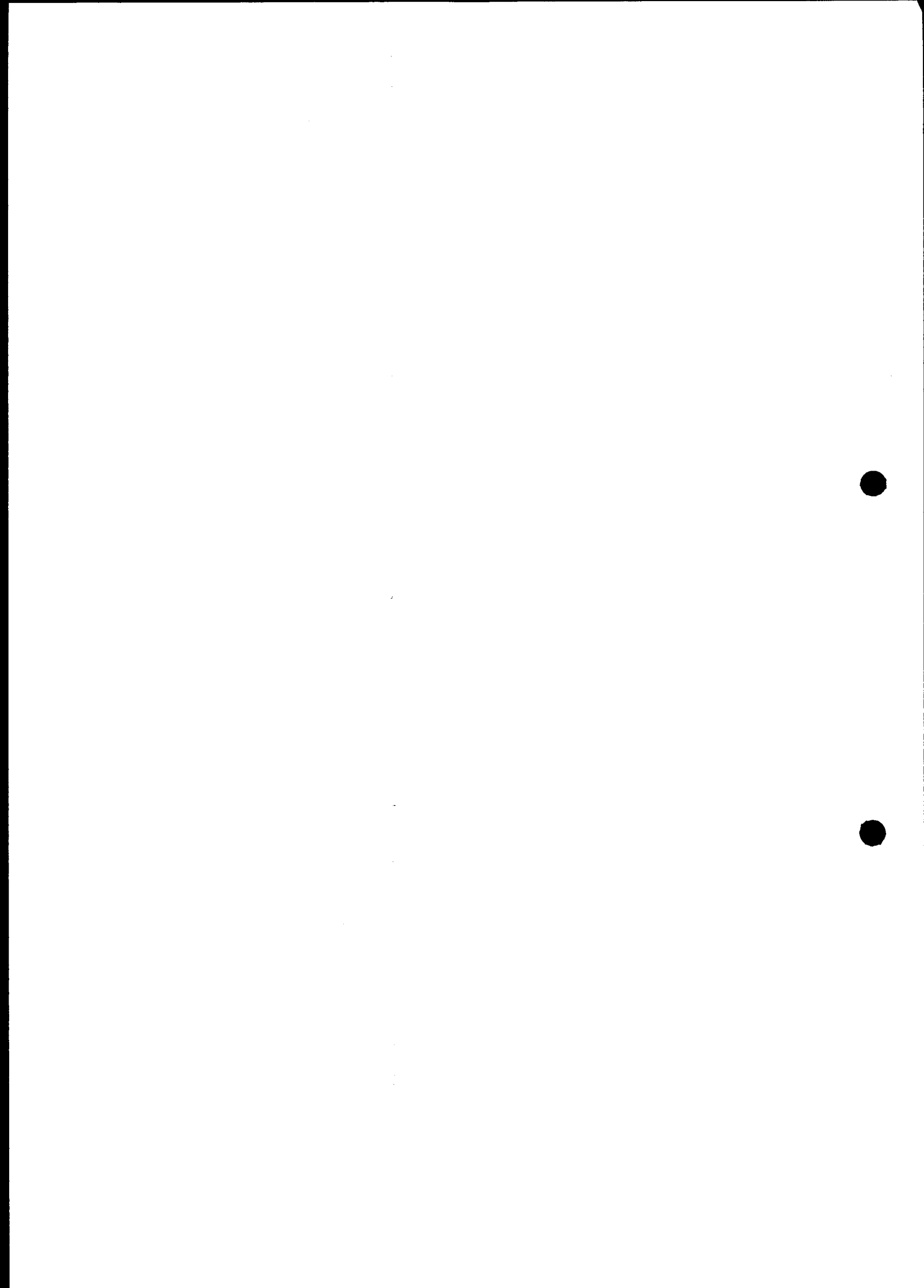
10/2/2018 (5)

### **Historical**

- 1) Delimitation Committee has not considered the historical background of the constituency PS-1 (Previously called as PS-14) in which my Tapa Zangipur and entire STC Bahadurpur remained for years. It had ever voted in constituency where Jacobabad city was part of. Neither STC Bahadurpur nor its Tapa Zangipur remained part of any other constituency.

### **Gegraphical**

- 2) That Tapa Zangipur is part of STC Bahadurpur which is part of PS-1 and sub Division Thull whereas the Tapa Zangipur has been excluded from it and made part of PS-3 by doing which the Delimitation Committee has neglected the existing boundaries of administrative unit hence violated the principles laid down in Section 20 of The Election Act 2017.
- 3) That Garhi Khairo City is at a distance of approximately 64 Kilometers from Tapa Zangipur whereas Jacobabad City (which is District Head Quarter) is only at a distance of approximately 8 Kilometers and by neglecting this factor the Delimitation Committee has again violated the principles laid down in Section 20 of The Election Act 2017 by not considering the communication facilities and Public convenience.
- 4) The representative of the Garhi Khairo in future will mostly remain unreachable for the the Tapa Zangipur because of the long distance whereas the representative of PS-1 will considerably remain more reachable.
- 5) In general preliminary delimitation of District Jacobabad favors to some groups of the District Jacobabad which may not be encouraged.



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6) In Preliminary Report published by Election Commission of Pakistan on 26-03-2002 similar changes were made by Then Delimitation Committee in which Tapa Zangipur was excluded from PS-14(Now PS-1) and included into PS13(Now PS-3), which was challenged into the Election Commission Pakistan and was cancelled by it.

**(Copies of Preliminary Report 2002 extract and Final Report 2002 extract are enclosed herewith and annexured as "" & "")**

### **PRAYER**

In view of above this Honourable Commission may be pleased to:-

a) Set aside the preliminary delimitation of the constituencies of the Provincial Assemblies in District Jacobabad and accept the proposal of the Petitioner (which is made by keeping focus at the population balance between the constituencies) for final list of constituencies by including the Tapa Zangipur into PS-1 and excluding Mubarakpur from PS-1 and including it to PS-3.

**(Copy of Marked map & proposed draft according to population enclosed herewith and annexured as "E" & "F")**

b) Any other relief which deems fit, proper and just under the circumstances of the case.

Islamabad  
Dated:02-04-2018

**PETITIONER**  
**Mobile No 03462088778**

