

(01)

BEFORE THE ELECTION COMMISSION OF PAKISTAN
ISLAMABAD.

Objections No. of 2018

Allah Ditto s/o Bashir Ahmed by caste Mangan
r/o Village Qaim Mangan, STC Gerello,
Taluka Bakrani District Larkana.

AM
03-04-18

..... Applicant/Objector

Versus

1. The Delimitation Authority
Election Commission of Pakistan.
Election Commission House Islamabad.
2. The Election Commission of Pakistan
Through its Secretary,
Election Commission House, Islamabad. Respondents

REPRESENTATION UNDER RULE 12 OF THE ELECTION
RULES, 2017 AGAINST DRAFT FORMATION OF THE
CONSTITUENCIES OF P.S-12 LARKANA III AND
P.S-13 LARKANA-IV.

The applicant above named being voter of PS-13 Larkana IV and resident of village Qaim Mangan, of STC Gerello, Taluka Bakrani, district Larkana having electoral block No.314020407 at Serial No.189, respectfully submits his representation on following facts and grounds.

F A C T S

Facts giving rise to the instant application are that the Election Commission of Pakistan has been pleased to issue draft proposals for delimitation of constituencies including PS-12 Larkana-III and PS-13 Larkana-IV. The grievance of the applicant is in respect of delimitation of PS-13 Larkana-IV.

The constituency of PS-12 Larkana-III is comprising of following areas:

a). Kanga STC	85619
b). Bero Chandio STC	70532
c). Abad STC	78530
d). STC Larkana excluding Tapo Larkana	50965
e). Charge-10 (LMC)	49547

(02)

f). Charge-11 total 56705
391898

MMR
03-09-18

P.S-13 Larkana-IV

a). Taluka Dokri 225294
b). Taluka Bakrani
excluding STC Abad 150914
total 376208

Maps of PS-12 Larkana-III and PS-13 Larkana-IV are enclosed hereto.

The draft proposal of aforesaid constituencies is neither just nor proper for the purpose of transparent and fair election process, and is inconvenient to the people of STC Gerello, hence this application inter-alia amongst on following grounds:

GROUNDS

1. That, it is submitted that while drafting the constituency of PS 13 Larkana-IV, STC Gerello has been included in PS 13 and STC Abad has been included in PS-12, which is unjust and against the interests of general public of STC Gerello as PS 12 Larkana-III is more convenient to them, and it has been done at the ill advise of the district functionary who were assisting the delimitation authority and the intention of district functionary was to accommodate some political personalities of their choice, belonging to P.S-13 Larkana-IV.
2. That such division of STC Gerello, Town Committee Gerello and STC Abad in the present shape will not be feasible to the general public for the purpose of development schemes and other facilities and question of population will also not arise, as Population of STC Gerello is 65041 and Population of Abad STC is 78530, thus it is clear that population for the purpose of delimitation of P.S-12 Larkana-III and P.S-13 Larkana-IV will not disturb the situation.
3. That for the purpose of reconstitution of P.S-12 Larkana-III and P.S-13 Larkana-IV, proposals are submitted as under:

(3)

Jim
03-04-18

PS-12 Larkana-III

a). Kanga STC	85619
b). Bero Chandio STC	70532
c). Gerello STC	53443
d). Town Committee Gerello	11598
e). STC Larkana excluding Tapo Larkana	50965
f). Charge-10 (LMC)	49547
g). Charge-11	<u>56705</u>
total	378409

P.S-13 Larkana-IV

a). Taluka Dokri	225294
b). Taluka Bakrani including STC Abad	<u>164403</u>
total	389697

4. That for the purpose of delimitation of the constituencies of Larkana, if the remaining two constituencies viz. P.S-10 Larkana-I and P.S-11 Larkana-II are delimited afresh or the same are kept in its original shape which is reproduced as under, neither population will be disturbed nor public at large will suffer:

PS-10 Larkana-I

a). Taluka Ratodero	331584
b). Akil STC of Taluka Larkana and	36381
c). Tapedar Circle of Larkana STC (Tapo Larkana)	<u>4064</u>
Total	372029

PS-11 Larkana-II

Larkana Municipal Corporation Charge 05, 06, 07, 08 and 09	384256
---	--------

5. That in rule 10 (5) it is provided that the delimitation shall start from north and then be proceeded clock-wise in zigzag manner, therefore, in both the positions STC Abad will fall in PS 13-Larkana IV and STC Gerello will fall in P.S-12 Larkana-III, therefore, exclusion of STC Gerello from P.S-12 Larkana-III and inclusion of STC Abad in P.S-12 Larkana-III is not proper but is against the

(4)
JM
03-04-18

interest of general public so also against transparency of the election process, hence above proposed changes if will be effected, it will serve the purpose of the Election Commission of Pakistan in letter and sprit.

6. That, since the delimitation committee has not been properly assisted by the functionary at Larkana while delimiting the constituencies rather has caused inconvenience to the voters/public, therefore, it is very important to review the proposals of draft delimitations of above said constituencies in public interest.

7. That, population of PS-12 Larkana-III at present is 391898 and population of PS-13 Larkana-IV at present is 376208 and if the constituencies are reorganized as proposed by the applicant, the new figure of population in PS-12 Larkana-III will be 378409 and population of PS-13 Larkana-IV will be 389697, therefore, the population will be very close to each other and it will make no difference in reorganization of above said constituencies as provided in Rule 12 (4) of the election rules, 2017.

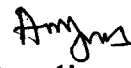
8. That, in view of the above objections and the proposals submitted by the applicant, it is prayed that the delimitation of the aforementioned constituencies may be reviewed and reconstituted accordingly, in order to avoid the complications and the hurdles which will be suffered by the public in existing position, as the STC Gerello, belonging to the applicant is more convenient and feasible, if it is included in PS-12 Larkana-III.

9. That if prayer is allowed, it will meet the ends of justice.

2nd April, 2018.


Allah Ditto Mangan

Presented through Advocate of the applicant


Applicant