

To,

The Secretary,
Election Commission of
Pakistan, Islamabad.

10/07/2017
1-4

**REPRESENTATION UNDER SECTION 21 (2) & (3)
OF ELECTION ACT-2017/ REPRESENTATION/
OBJECTIONS IN RESPECT OF DELIMITATION
OF PS-19, GHOTKI-II, & PS-20, GHOTKI-III,
PROVINCIAL ASSEMBLY SINDH.**

The voters named below respectfully submit their
representation/objections as under:-

1. That, the objectors namely:-

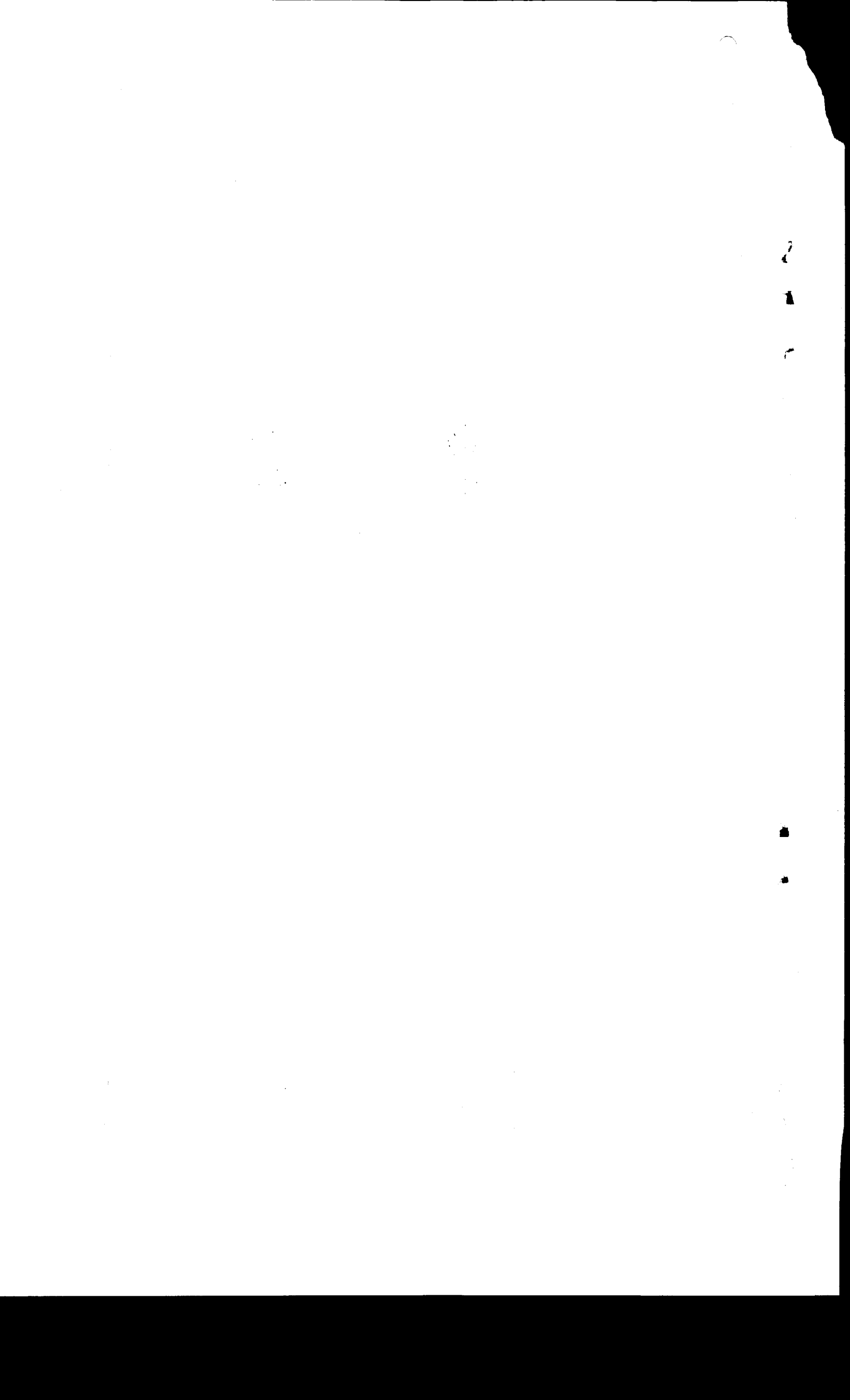
1. Abdul Bari Pitafi son of Ahmed Ali Khan Pitafi, muslim, adult, by caste Pitafi, resident of village Sardar Ahmed Ali Khan Pitafi, Deh Khushk, Taluka Daharki, District Ghotki, voter, at old Sr. No:402, Block Code 332020313, Deh Lal Pitafi, new at Sr. No:437, Block Code 332020313, Deh Lal Pitafi, Taluka Daharki, having CNIC No:45101-7679083-3.

POSTAL ADDRESS:-

Pitafi House, near Old Taluka Hospital,
Mirpur Mathelo, City, Taluka Mirpur
Mathelo, District Ghotki.

2. Rafique Ahmed Mangi son of Gul Hassan, muslim, adult, by caste Mangi, resident of village Dr. Azizullah Mangi, P/O Ghulam Hussain Laghari, Deh Gendaro, Taluka Mirpur Mathelo, District Ghotki, voter, at old Sr. No:53, Block Code 330050305, Circle No:03, Municipal Committee, Taluka Mirpur Mathelo, District Ghotki, new at Sr. No:20, Block Code 330050307, Municipal Committee, Taluka Mirpur Mathelo, District Ghotki, having CNIC No:45104-0279853-1.

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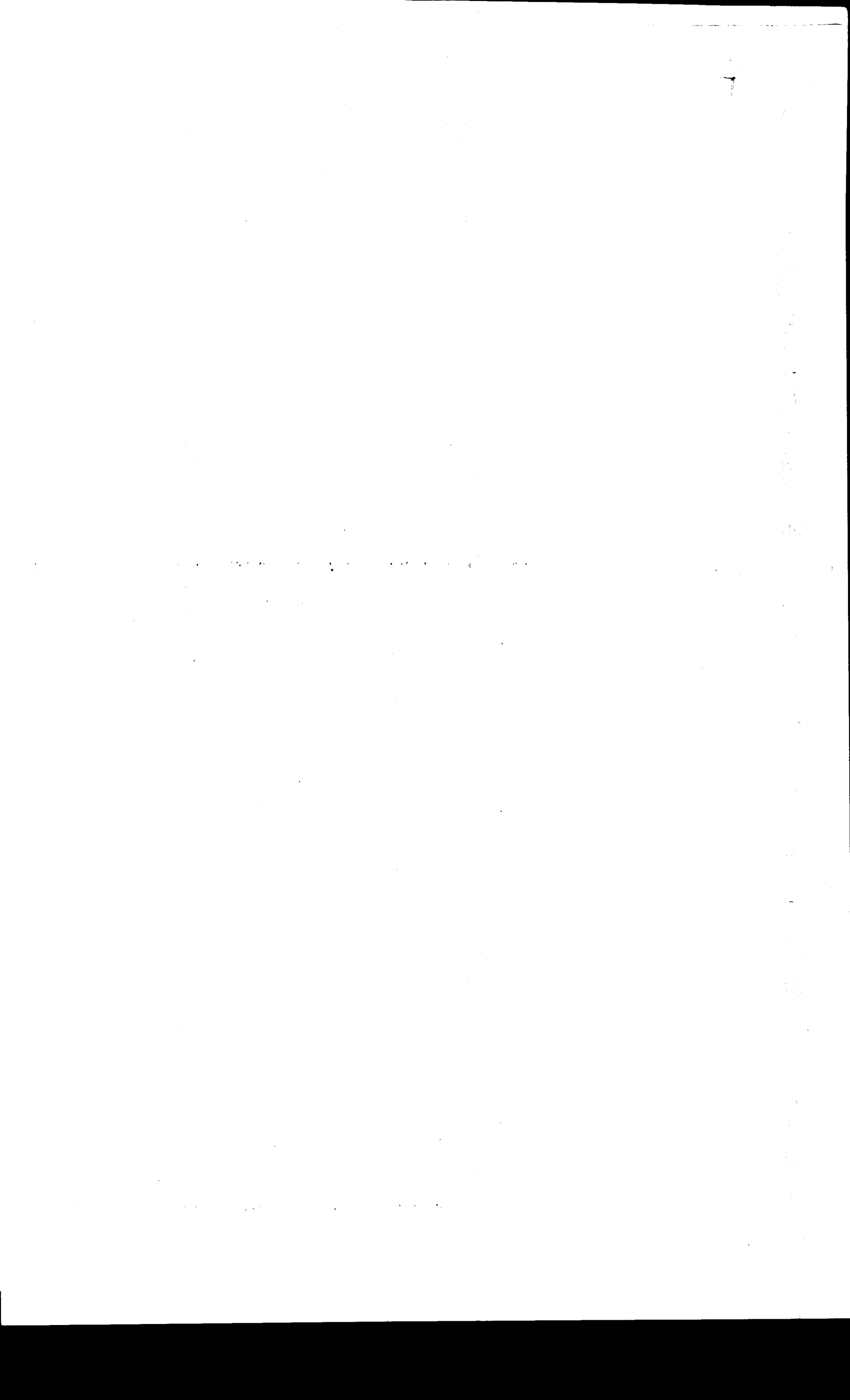


POSTAL ADDRESS:-

C/O Chughtai Lab, Opposite Clock Tower, Mirpur Mathelo, City, Taluka Mirpur Mathelo, District Ghotki.

1. That, both abovenamed objectors are the voters and residents of old PS-07, Ghotki-III and newly proposed PS-19, Ghotki-II. Whereas, the objector No:1, is sitting MPA from PS-07, Ghotki-III.
2. That, previous constituency PS-07 Ghotki-III, had almost same location and has been numbered as PS-19, Ghotki-II, whereas previous PS-08, Ghotki-IV, has been numbered as PS-20 Ghotki-III.
3. That, previous PS-07, Ghotki-III, was comprised of Taluka Daharki, excluding TCs Sajjan, Jampur, Khenjhoo, of STC Khenjhoo and from Taluka Mirpur Mathelo, STC Yaro Lund, STC Mirpur Mathelo and including Mirpur Mathelo Town Committee area.
4. That, previous PS-08, Ghotki-IV, was comprised of STC Jarwar, STC Machhalo, from Taluka Mirpur Mathelo, STC Jahanpur, from Taluka Ghotki and whole Taluka Khangrah of District Ghotki.

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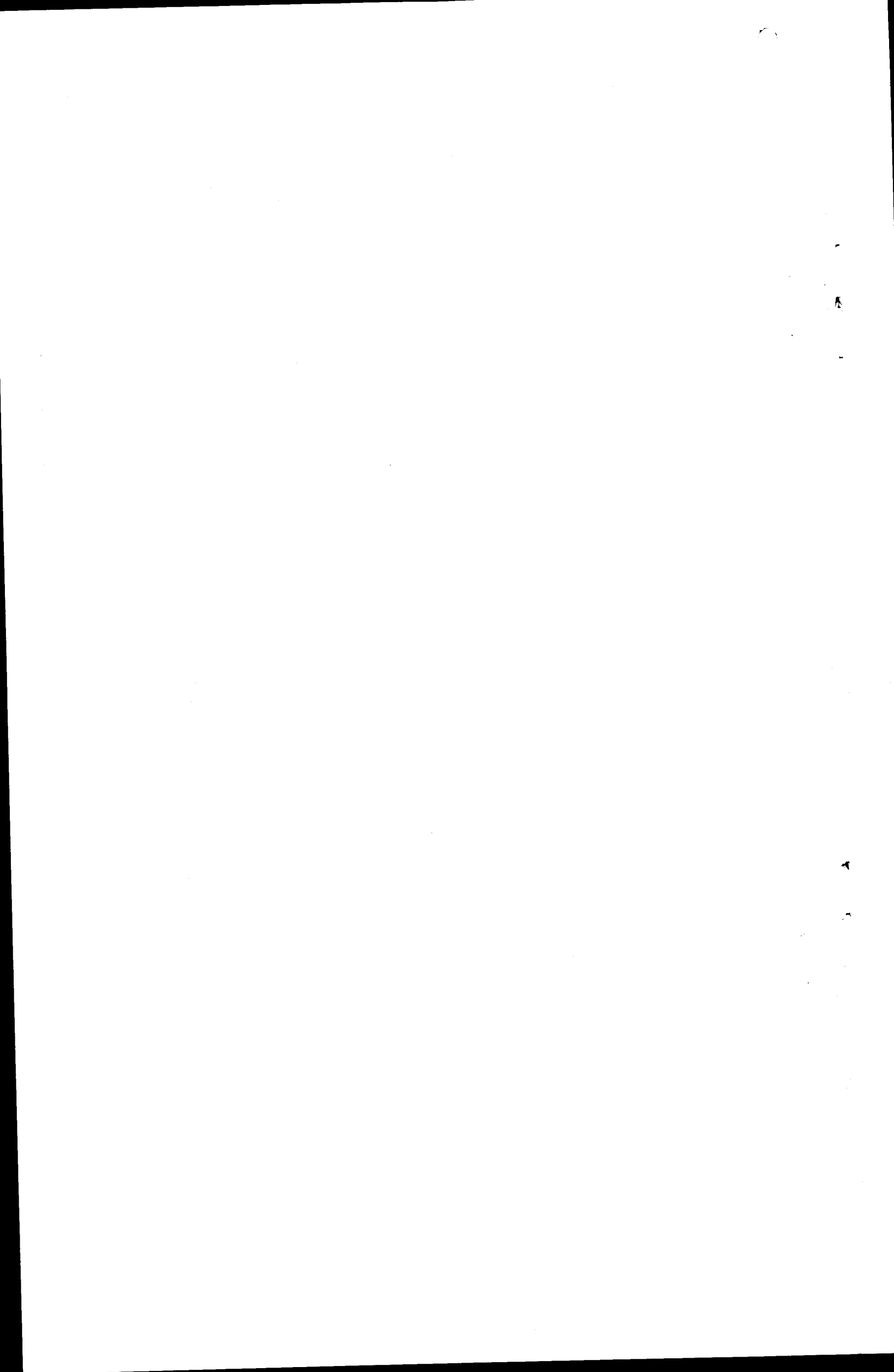
Bozdar/2018

NAME OF UNION COUNCILS	WARDS	DEHS	CENSUS BLOCK NUMBERS
No:66 UC Garhi Chakar	Ward No:1	Garhi Chakar	330020401-02-03-04
=	Ward No:2	Jhanghan	330020406-07-08
=	Ward No:3	Deh Baloch Khan	330020307-07-08-10
=	Ward No:4	Deh Pipri Deh Belo Bozdar	330010401-02-03

Photo state copy newly proposed changes, duly approved, is annexed.

6. That, once again, an attempt was made to include the rural areas of Tapo Garhi Chakar and Tapo Sabar Bozdar in the Urban Limits of Municipal Committee Mirpur Mathelo, during the census 2016. It is pertinent to mention here, that; the urban areas and the rural areas have been separately indicated in census block numbers in the census record of National Census, District Ghotki. The census staff had to assign the urban block numbers to urban areas with charge code No:33005 and rural areas with block numbers charge code 33001 or 33002. Instead thereof, the rural area of Dehs, 1. Deh Garhi Chakar, 2. Deh Jhanghan, 3. Deh Baloch

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22/04/2018

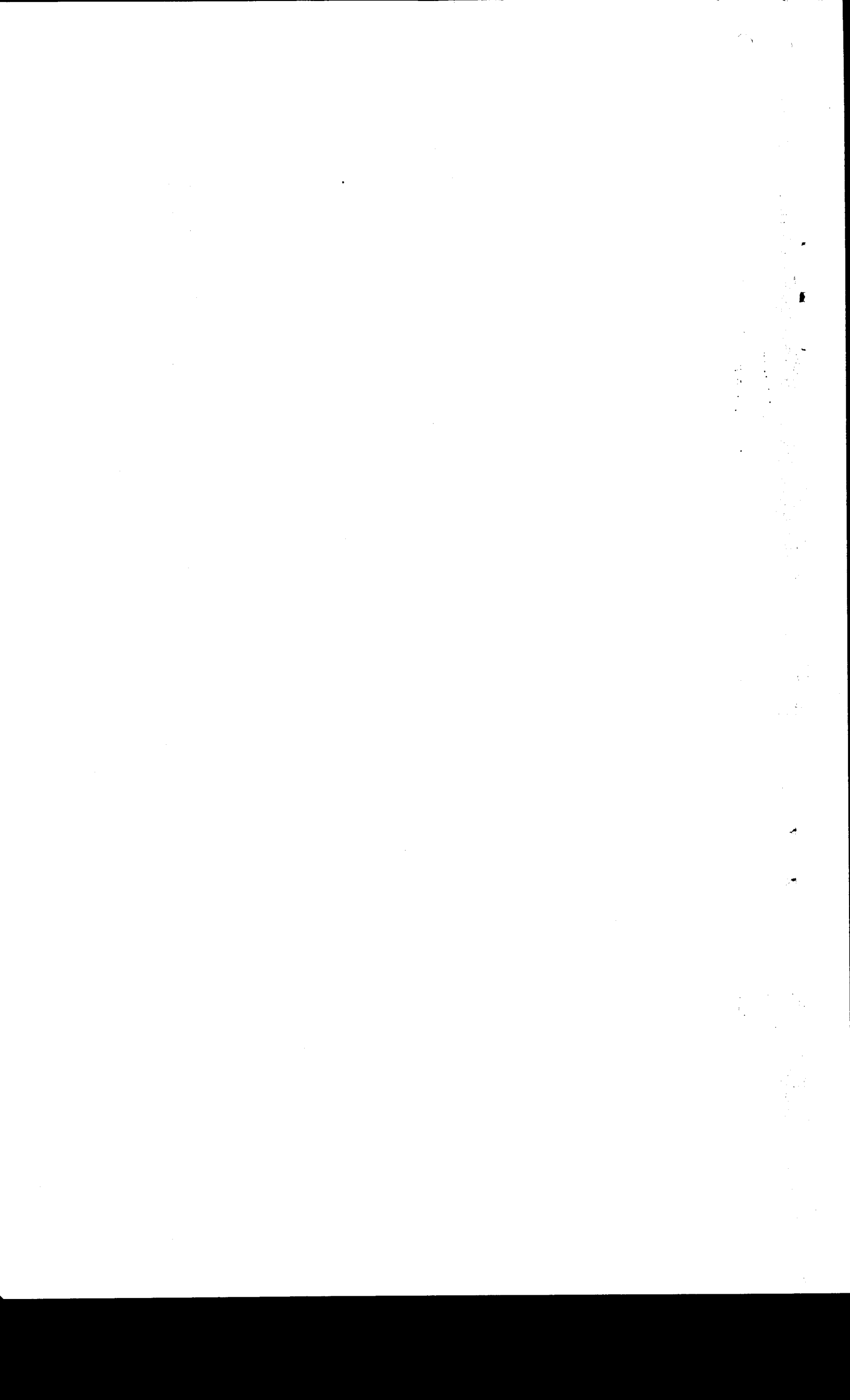
Khan. 4. Deh Pipri, 5. Deh Belo Bozdar and 6. Deh Barar have been assigned urban block numbers, as follows:-

S.No.	CENSUS BLOCK CODE									NAME OF BLOCK
186	3	3	0	0	5	0	8	0	1	Pipri
187	3	3	0	0	5	0	8	0	2	Pipri
188	3	3	0	0	5	0	8	0	3	Belo Bozdar
189	3	3	0	0	5	0	9	0	1	Garhi Chachar
190	3	3	0	0	5	0	9	0	2	Garhi Chachar
191	3	3	0	0	5	0	9	0	3	Garhi Chachar
192	3	3	0	0	5	0	9	0	4	Garhi Chachar
193	3	3	0	0	5	0	9	0	5	Garhi Chachar
194	3	3	0	0	5	1	0	0	1	Barar
195	3	3	0	0	5	1	0	0	2	Jhangan
196	3	3	0	0	5	1	0	0	3	Jhangan
197	3	3	0	0	5	1	0	0	4	Jhangan
198	3	3	0	0	5	1	1	0	1	Baloch Khan
199	3	3	0	0	5	1	1	0	2	Baloch Khan
200	3	3	0	0	5	1	1	0	3	Baloch Khan

7. That, abovementioned manipulation through census record has been challenged before Honourable High Court of Sindh, Bench at Sukkur, by the Municipal Committee Mirpur Mathelo, vide CP No:D-264 of 2018, (Municipal Committee Mirpur Mathelo versus Federation of Pakistan and 12 others).

8. That, the areas under Union Council Garhi Chakar are no more part of the Municipal Committee Mirpur Mathelo. The areas of Tapo Garhi Chakar, except Deh Baloch Khan, and Tapo Sabar Bozdar, except deh Belo Bozdar, Taluka Mirpur Mathelo are shown and included in PS-20, Ghotki-III, as per

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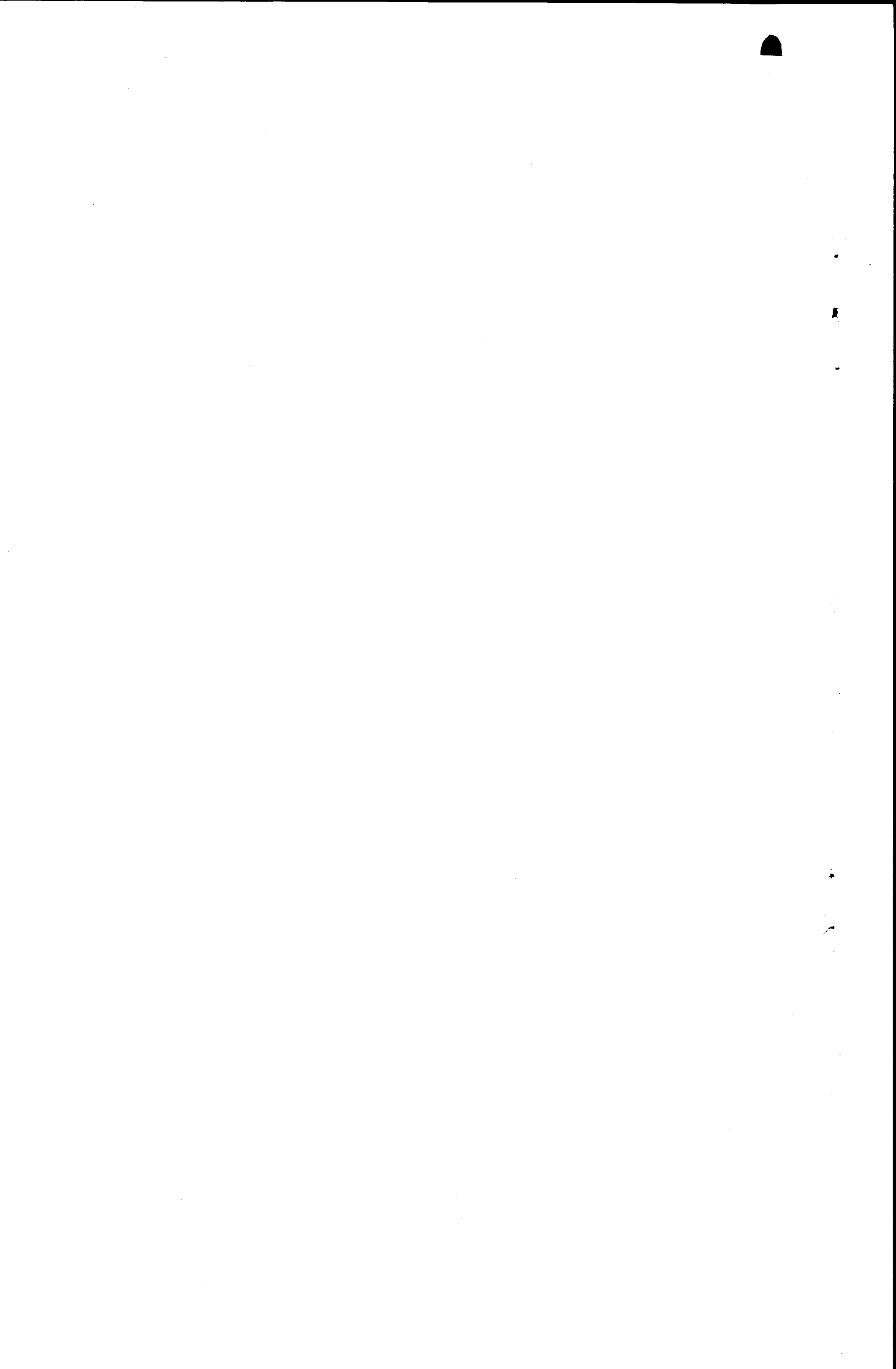
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official marked map, issued by Election Commission of Pakistan, but their population has not been correctly calculated and has not been included in PS-20, Ghotki-III, as per location shown on marked map of the Election Commission of Pakistan. The wrong calculation has been proposed to be corrected in terms of following chart:-

DELIMITATION BY ECP		PROPOSED BY APPLICANTS/ OBJECTORS/ VOTERS		
DISTRICT GHOTKI	TOTAL POPULATION	TO BE EXCLUDED	TO BE INCLUDED	REGIONAL POPULATION
PS-18, Ghotki-I	425,222	N/A	N/A	425,222
PS-19, Ghotki-II	426,263	21228	Nil	405,035
PS-20, Ghotki-III	402266	Nil	21228	423,494
PS-21, Ghotki-IV	393,488	N/A	N/A	393,488
TOTAL	16,47,239			16,47,239

9. That, during the process of resent delimitation between PS-19 Ghotki-II and PS-20, Ghotki-III, clearly wrong delimitation has been done in respect of Deh Baloch Khan Tapo Garhi Chakar, which is shown in PS-19, Ghotki-II, whereas remaining dehs TC Garhi Chakar have been shown in PS-20, Ghotki-III, on the official marked map. It would be just and proper, if Deh Baloch Khan of Tapo Garhi Chakar, may be included in PS-20 Ghotki-III and excluded form the limits of PS-19, Ghotki-II.

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10. That, the delimitation of both the constituencies have been done in disregard to distribution of population in geographically compact areas.

11. That, the delimitation has been done without considering geographical and physical future of the area.

12. That, the existing boundaries of administrative unit, i.e., TC Garhi Chakar has been broken, violated without considering its violative effect of provisions of section 20 of Election Act-2017.

13. That, facilities of communications public convenience and other cognate factors had not been considered to ensure homogeneity in the creation of constituencies.

14. That, repeated attempts of gerrymandering have been made to establish political advantage for a particular political party and group.

15. That, unbalanced discriminatory delimitation has been done in respect of abovementioned two constituencies.

16. That, the delimitation under objection is intended to defeat the ends of justice and the objects of the statutes.

17. That, there is glaring malafides or criminal negligence on the part of the staff having conducted the delimitation proceedings in respect of abovementioned two constituencies.

18/02/04/2012

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18. That, the objections have been filed within time.
19. That, the objectors crave permission to raise any legal factual relevant ground at the time of hearing these objections, as permission under law.

PRAYER:-

It is therefore prayed, that; in view of above submissions and objections, the delimitation in respect of PS-19 Ghotki-II and PS-20, Ghotki-III, may be corrected by including deh Baloch Khan, in PS-20, Ghotki-III, alongwith other dehs of TC Garhi Chakar, already shown in PS-20 Ghotki-III, on the official map of the Election Commission of Pakistan. So also same deh, i.e., Baloch Khan, may be excluded from the PS-19 Ghotki-II.

Further prayed, the population of each PS, i.e., PS-19 Ghotki-II and PS-20, Ghotki-III, may be recalculated and corrected, as per following proposed chart of population of District Ghotki.

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PS-21, Ghotki-IV	393,488	N/A	N/A	393,488
TOTAL	16,47,239			16,47,239

OBEJCTOR No:2 FOR HIMSELF
AND AS AN ATTORNEY OF
OBJECTOR No:1.

RAFIQUE AHMED MANGI
SON OF GUL HASSAN MANGI,
C/O CHUGHTAI LAB,
OPPOSITE CLOCK,
TOWER, MIRPUR MATHELO,
CITY, TALUKA MIRPUR
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DOCUMENTS ANNEDED:-

AS PER INDEX.

