

To,

The Honorable Secretary,
Election Commission of Pakistan,
Islamabad.

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03-04-18

Subject: **MEMORANDUM/ REPRESENTATION UNDER RULE 12 OF THE ELECTION RULES 2017 AGAINST THE DELIMITATION OF PS-24 SUKKUR-III & PS-25 SUKKUR-IV PROVINCIAL ASSEMBLY CONSTITUENCIES OF DISTRICT SUKKUR PROVINCE OF SINDH.**

Being aggrieved of and dissatisfied with the delimitation proposal dated 05th March 2018 issued by the Delimitation Committee Sindh for the seats of Provincial Assemblies of Sindh for District Sukkur PS-24 Sukkur-III and PS-25 Sukkur-IV, I being a applicant/voter of the objected constituency respectfully and most humbly submits following representation/objections against the delimitation of above said constituencies made by the Election Commission of Pakistan / delimitation committee of Sindh Province.

GROUND/ OBJECTIONS ON THE CONSTITUENCIES OF PS-24 SUKKUR-III & PS-25 SUKKUR-IV DISTRICT SUKKUR

1. That the applicant/petitioner is registered voter of the constituency of District Sukkur as such entitles to make this representation.

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2. That the preliminary delimitation issued by the Election Commission of Pakistan/ delimitation committee of Sindh Province in respect of PS-24 Sukkur-III and PS-25 Sukkur-IV of District Sukkur by ignoring the principles/guidelines given in Section 20 of the Election Act-2017 and Rules 7, 8, 9 and 10 of the Election Rules-2017.
 3. That as per sub-section (1) of section 20 of the Election Act-2017 provides that there is no need to disturb existing boundaries of administrative units but delimitation committee even violated this sub-section in respect of PS-24 Sukkur-III and PS-25 Sukkur-IV.
 4. That the taluka Sukkur City illegally been broken into two parts and included in PS-24 Sukkur-III of its half areas and other remaining areas into PS-25 Sukkur-IV, which is sheer injustice to the peoples of taluka Sukkur City.
 5. That the geographically and compactness of both the constituencies have been intentionally/deliberately ignored by gifting seats in pocket to the particular political party.
 6. That the preliminary delimitation made by the Delimitation Committee of Sindh Province of PS-25

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PS-25 Sukkur-IV	a) New Sukkur Taluka excluding the following areas:-	182,198
	i) Charge No. 6,	
	ii) Circle No. 3, 4, 5 & 6 of Charge No. 5	
	b) Municipal Committee Rohri of Taluka Rohri	69,920
	c) Tapedar Circle Rohri of Rohri STC of Taluka Rohri	65,181
	d) The following Tapedar Circles of Pano Akil STC of Taluka Pano Akil:-	
	i) Sunder Belo	10,061
	ii) Panhwari Jageer,	12,776
	iii) Nauraja and	14,195
	iv) Hingoro	33,002
	of District Sukkur.	
	Total	387,333

The proposed marked maps of above proposals are also attached.

The applicant/ petitioner respectfully submits above legal objections/representations, praying inter alia therein that Honorable Election of Pakistan may be pleased to call for the record and proceedings to the extent of above constituencies and may be pleased to check the legality, propriety, validity and correctness of the proposed delimitation and may further be pleased to alter and modify the proposed constituencies by accepting the proposal filed by the applicants/ petitioners taking into consideration of following legal objections and grounds.

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Sukkur-IV by including the areas of four (04) Talukas i.e. Sukkur City, New Sukkur, Rohri & Taluka Pano Aqil for which the basic facilities of the peoples of these four talukas have been badly affected and civil facilities like water, sewerage, sanitation and development schemes shall be frustrated.

The applicant/ petitioner respectfully and most humbly submit following proposals on consideration of above legal objections/ grounds:

No. and Name of the Constituency	Extent of Constituency proposed for	Population
PS-22 Sukkur-I	Taluka Pano Akil excluding following Tapedar Circles of Pano Akil STC:- i) Sunder Belo, ii) Panhwari Jageer, iii) Nauraja and iv) Hingoro of District Sukkur Total	365,789 365,789
PS-23 Sukkur-II	a) Taluka Salehpat; b) Taluka Rohri excluding the following areas:- i) Municipal Committee Rohri and ii) Tapedar Circle Rohri of Rohri STC of Rohri Taluka of District Sukkur Total	129,619 236,003 365,622
PS-24 Sukkur-III	a) Taluka Sukkur City; b) The following areas of New Sukkur Taluka:- i) Charge No. 6, ii) Circle No. 3, 4, 5 & 6 of Charge No. 5 of District Sukkur. Total	231,589 96,702 40,868 369,159


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That the applicant/ petitioner seeks indulgence of the Honorable Commission to urge more grounds from the record at the time of hearing of this representation.

That the applicant/ petitioner therefore, respectfully prays as under:-

PRAYER

- a) That the Honorable Election Commission of Pakistan may be pleased to set aside the preliminary delimitation of the constituencies of PS-24 Sukkur-III and PS-25 Sukkur-IV of District Sukkur and may kindly be accept the proposal of applicants/ petitioners for final list of constituencies.
- b) Any other relief deemed fit and proper under the circumstances of the representation.


Dated: 01-04-2018
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