

BEFORE THE ELECTION COMMISSION OF PAKISTAN

ECP.

through Secretary
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P/S/01/2018
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Shafique Ahmed Noohani S/o Abdul Rasheed,
Muslim Adult, By caste Noohani,
R/o Piryalo, Taluka Kingri,
District Khairpur

Petitioner

Block code: 334030204

Versus

The Delimitation Committee Sindh

Respondent

REPRESENTATION UNDER RULE 12 OF THE ELECTION RULES 2017
AGAINST THE DELIMITATION OF PROVINCIAL ASSEMBLY
CONSTITUENCY IN DISTRICT KHAIRPUR PROVINCE OF SINDH

Being aggrieved and dissatisfied with the Delimitation proposal Dated 5th March 2018 issued by the Delimitation Committee Sindh for the seats of the Provincial Assembly of Sindh for District Khairpur P.S-26 Khairpur-I, P.S-27 Khairpur-II, P.S-28 Khairpur-III, P.S-29 Khairpur-IV, P.S-30 Khairpur-V, P.S-31 Khairpur VI and P.S-32 Khairpur-VII, therefore the petition praying with submitting its representation, that this Honourable Election Commission of Pakistan may be pleased to call the Record and proceedings of the above said constituencies, after considering and accepting the proposal of the petitioner, specially the Constituency P.S 26 District Khairpur-I may kindly modify the proposed constituencies of District Khairpur on consideration of following facts and grounds:-

FACTS

1. That, the census was conducted in the year of 2017, after that the National Assembly Of Pakistan unanimously passed bill according to which the National Assembly of Pakistan generated another constituency of Provincial Assembly in District Khairpur due to increase in population of District Khairpur.

2. That, prior to census, there were 6 provincial Assembly seats as per 1997/98 census, as the then population of District Khairpur was 1,547,751/- which has been increased now upto 24,05,523, therefore on consideration of the above reason the National Assembly of Pakistan has generated another Provincial Constituency for District Khairpur.

3. That, the total area of District Khairpur is 15,910 KM, consist upon the then 6 constituencies which now increased to 7 for the betterment of the District Khairpur according to the population.

4. That, the initial proposal presented by the Delimitation Committee regarding P.S-26 Khairpur-I of the Election Commission of Sindh regarding P.S-26 Khairpur-I is not an ideal as it does not achieved the basic purpose of the new Constituency P.S-26 Khairpur-I.

Photostat copy of Initial Proposal of Provincial and National Assembly Constituencies are attached herewith as annexure "A"

5. That, for such reasons, the petitioner approach before this Forum with modification of the Constituencies of District Khairpur specially P.S-26 Khairpur-I with the kind proposal.

Photostat copy of Modify proposal is of Provincial and National Assembly Constituencies are attached herewith as annexure "B"

GROUND S

1. That, the petitioner is a registered voter of the Taluka Khairpur and residing with the Jurisdiction of the Taluka Khairpur.

2. That, the initial proposal presented by the Delimitation Committee is not according to the whim and wish of the Constituencies and also not achieved the fundamental requirements of the Constituencies of District Khairpur.

3. That, the proposal presented by the petitioner ensure homogeneity in the creation of Constituencies and very much practicable according to geographically, population wise, boundaries of existing units and for the betterment of the District.

4. That, the proposal presented by the Petitioner is for the betterment of the new proposed Constituency P.S-26 Khairpur-I, as its boundaries are touching the Urban as well as Rural Areas of District Khairpur and also does not effect other constituencies of District Khairpur.

5. That, the new proposed Constituency P.S 26 Khairpur-I consisting upon the backward areas and having lack of education, health facilities and other fundamental requirements, therefore according to the proposal the Rural Areas of the new constituency will touch the Urban and central point of the District Khairpur by which new proposal Constituency will be developed and the inhabitants of the Rural Area will be able to get their fundamental and basic rights.

6. That, the Constituency also starting from the Northern end of the District Khairpur.

7. That, the democracy is the cardinal feature of our Constitution and Democracy means the welfare of the citizens of the Country, by this proposal presented by the Petitioner, the Inhabitants of the new constituted Constituency will be able to enjoy the cardinal features of the democracy.

31/12/08
S/S/O/2016

8. That, the marked maps of the constituency are also attached.
9. That, the further grounds will be advance at the time of the hearing of the representation.
10. That, it will be in the best interest of justice to allow this petition.

518/12/2018


Dated: - -2018


PETITIONER

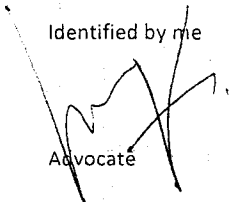
Verification

I, Shafique Ahmed Noohani S/o Abdul Rasheed, Muslim Adult, By caste Noohani, R/o Piryalo, Taluka Kingri, District Khairpur, Do hereby state on oath as under that whatever stated herein above in the facts and the grounds of representation is true and correct to the best of my knowledge and believe.

Verified at Islamabad on this the _____ day of April, 2018


Deponent
(45204-5927959-3)

Identified by me


Advocate

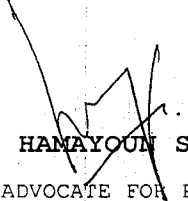
Documents filed:-

1. Photostat copy of Initial Proposal of Provincial and National Assembly Constituencies.
2. Photostat copy of Modify proposal is of Provincial and National Assembly Constituencies.
3. Map of proposed constituencies.

DOCUMENTS RELIED UPON

Any other document/paper to rebut the case of Plaintiff and to establish the case of defendants.

Drawn and drafted by me under the Instructions from Petitioner.



HAMAYOUN SHAIKH
ADVOCATE FOR PETITIONER

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Shaikh Law Chamber Office No.25 Mazanine Floor,
Hamayoun GymKhana Sukkur.

Cell No.0314-7105527

Handwritten signature and date: 15/12/2015