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**IN THE ELECTION COMMISSION OF PAKISTAN  
ISLAMABAD** through Secretary E.C

Representation No. \_\_\_\_\_/2018

**Zahid Ali Banbhan**

S/o Raees Elahi Bux, Muslim, adult,  
resident of Kandiari, P.O. Zafarabad,  
Tehsil: Faiz Ganj, Distt: Khairpur.....**Petitioner**

**Versus**

**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**

This representation is made in respect of PS-29, Khairpur-IV and PS-28 Khairpur-III, along with generalized objections in respect of the other constituencies of District: Khairpur Sindh, on consideration of the following facts and grounds:

**FACTS**

1. That, petitioner respectfully submits that he is the voter of PS-29 Khairpur, Taluka: Mirwah, Khairpur-IV and is currently member of District Council: Khairpur, a social worker and political figure of the area has remained

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Member Provincial Assembly, Province of Sindh, in  
2002.

2. That, this representation is made in respect of public notice, published by the Election Commission of Pakistan for calling objections in respect of proposed delimitation of the constituencies, hence this representation in respect of PS-29 is made comprised of following grounds.

#### **GROUND**

1. That, all 06 constituencies of District: Khairpur, have balance ratio of population of about 3,50,000 per constituency, whereas the same principle has not been applied in respect of PS-29 Khairpur-IV, total population for the proposed constituency of PS-29 Khairpur-IV is about 3,31,540 such variation is contrary to the 10% ratio as contemplated in chapter-III, Article-20, Sub Clause-IV of the Election Act 2017.
2. That, the deficiency of ration of population in PS-29 is more than 10% and such fact has not been considered by the delimitation committee. It is further submitted that the physical features and principles has not been seriously considered while delimiting PS-29 Khairpur-IV.



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3. That, the proposed delimitation of PS-29 Khairpur-IV and PS-29 Khairpur-III have prejudiced the public at large of both constituencies particularly the people of TC HUSSAIN PATO, TC KHENYARI and TC AKRI.
4. That, it is submitted that the Tapedari Circle Akri consists of 02 Deh i.e. Akri and Sujawal Rajpar both are situated near to Taluka Headquarter: Faiz Ganj, which falls within PS-28 Khairpur-III.
5. That, it is asserted that both Deh of TC AKRI has been bifurcated/broken into 02 parts, the Akri has been included in PS-29, whereas Deh: Sujawal Rajpar has been merged into PS-28, it is submitted that such bifurcation is in violation of the Rules & Regulations. The delimitation committee by dividing Tapedari Circle Akri in 02 parts has ignored the principles of delimitation contemplated in Article-20 of the Election Act-2017.
6. That, it is submitted as per the principles under Article-20 of the Election Act 2017 and its further sub clauses, the principles maintained under that, most applicable and acceptable method for the purpose of delimitation, it would be appropriate that the T.C. Akri (Deh: Akri +

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Deh: Sujawal Rajpar) both together be included in PS-28 for the reason that the Taluka Headquarter of Taluka Faiz Ganj, which is majorly comprised of PS-28 is most near as of administrative headquarter to the above said tapedari circle (Akri + Sujawal Rajpar).

7. That, while constituting PS-29 the major part is comprised of Taluka: Thari Mir Wah, whereas despite the above mentioned TC Akri the other parts which are taken from Taluka: Faiz Ganj are namely TC Kandiari and TC Wahleer, are within the principles of Article-20 of the Election Act, but above said TC does not provide the required % of population for PS-29, therefore in order to balance the population of PS-29, with other constituencies, if adjoining TCs, TC HUSSAIN PATO (Population 8204) and TC KHENYARI (Population 9606) Total: 17810, are included into PS-29 Khairpur-IV, this will balance the deficient ration of population of PS-29.
8. That, after making above submissions/representations the chart of population after including TC HUSSAIN PATO and TC KHENYARI and after excluding TC AKRI stands as under:









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PS-31 Khairpur-VI	a) Gambat Taluka	263,746
	b) The following TC of Ahmedpur STC of Taluka Kingri	
	i) Kolab Jial	32,423
	ii) Saidi	20,599
	c) The following TC of Kouro Phulpoto STC of Taluka Khairpur	
	i) Tando Masti and	31,063
ii) Wassan	9,715	
	<b>TOTAL</b>	339,556
PS-32 Khairpur-VII	a) Taluka Kingri excluding the following TC of Ahmedpur STC of Taluka: Kingri	287,186
	i) Kolab Jial	
	ii) Saidi	
	b) TC Khanpur of STC Khairpur	12,361
	c) The following TC of Taluka Khairpur	
	i) Tando Nazar Ali	5,569
	ii) Mangi &	10,909
	iii) Kouro Phulpoto	7,659
	<b>TOTAL</b>	323,684

Current Total	331540	331540
After excluding TC AKRI	12883	318657
After including TC HUSSAIN PATO AND KHENYARI	17810	336467

9. That, it is submitted that the principles as regards to distribution of population in geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience as well other cognat factors, which could ensure the homogeneity in creation of constituencies, is entirely absent while, including the parts of Taluka: Faiz Ganj into PS-29, it is submitted that it was appropriate that despite taking 02 different



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distinct areas of Taluka: Faiz Ganj into PS-29 Khairpur-IV due to compact population, one portion comprised of TC HUSSAIN PATO and TC KHENYARI would have been included into PS-29.

10. That, the above said representation in respect of including TC HUSSAIN PATO AND KHENYARI into PS-29 Khairpur-IV and excluding TC AKRI and merging into PS-28 does not prejudiced any of the candidate or political party rather this representation/proposal of exclusion and inclusion of tapedari circles are based upon the best public interest and considering the compact population of the constituencies and accessibility and convenience to the administrative offices of the constituencies.

**PRAYER**

It is therefore prayed that this august forum may kindly be pleased to:

- a) Accept this representation and modify the delimitation of PS-29 Khairpur-IV, whereby include TC HUSSAIN PATO and TC KHENYARI, Taluka: Faiz Ganj into PS-29 and exclude TC AKRI from PS-29 and merge the same into PS-28, in the larger interest of justice, equity and good conscience.



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- b) Call the record and papers from the concerned quarters of Election Commission in respect of PS-29 and PS-28 District: Khairpur, for the convenient and appropriate disposal of the instant representation, if this forum deems fit.

Karachi,  
Dated: 02-4-2018.

  
**PETITIONER**

  
**COUNSEL FOR PETITIONER**

**VERIFICATION:**

I, **Zahid Ali Banbhan** S/o Raees Elahi Bux, Muslim, adult, resident of Kandiari, P.O. Zafarabad, Tehsil: Faiz Ganj, Distt: Khairpur, do hereby state that whatever stated above is true and correct to the best of my knowledge and belief.

Karachi,  
Dated: 02-4-2018.

  
**DEPONENT**

Cell No. 0300-2147031  
CNIC # 45291-5301527-1

Block Code.

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Serial No 328

Electoral area.

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