The Secretary,

Election Commission Of Pakistan,

Election Commission Secretariat, Election House Constitution Avenue G-8/2 Islamabad.



Aamir Ali S/O Muhammad Habib, by caste Gill, R/O Chak No.3 Deh Khadwari, Union Council Khadwari, Taluka & District Sanghar. CNIC No.44203-3056157-1. Cell # 0333-2914715.

.....Applicant.

REPRESENTATION UNDER SECTION
21(3) OF THE ELECTION ACT, 2017
& RULE 12 OF THE ELECTION RULES, 2017
AGAINST DELIMATION OF PS-41, PS-43 AND PS-46
OF SANGHAR DISTRICT.

Being aggrieved and dis-satisfied with the delimitation /draft list of Constituencies of Provincial Assembly of Sanghar, Published on 5-03-2018 by Election Commissioner of Pakistan. The above named applicant prefer this representation that this Honourable Commissioner after hearing /considering the representation, amend/alter or modified the delimitation /draft list of PS-41, PS-43 and PS-46, of Sanghar District, on consideration of the following facts and grounds:-

## FACTS.

Brief facts of the representation are as under:-

1. That, the applicant is law abiding and peace loving citizen of Pakistan and respectable inhabitant of Sanghar District and politically well aware personality of the local area.

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orod voter of Khadwari.

2. That, the applicant is registered voter of Khadwari, in PS-41 from Taluka & District Sanghar, as per delimitation draft list.

(Copy of the voter list is annexed herewith and marked as annexure "A").

- 3. That, every voter including applicant is ambitious and willing to ensure that pre-poll management and all other affairs relating to the conduct of General Elections to be conducted fairly/ impartially/honestly according to constitution of Pakistan and existing laws and principles as well as to maintain the spirit of democracy intact.
- 4. That, Sanghar district according to delimitation /draft list of constituencies carved as PS-41, PS-42, PS-43, PS-44, PS-45 and PS-46 comprising all the Talukas of District Sanghar i.e. Talukas Sanghar, Khipro, Jam Nawaz Ali, Talukas Tando Adam and Shahdadpur etc.

"Copies of the Draft/list of Constituencies for the relevant District and relevant delimitation Map are restore annexed herewith and marked as annexure "B, C & D" respectively.

5. That, according to delimitation/draft list PS-41 Sanghar-I comprised of (a). Area of Taluka Sanghar-I, (i). Municipal Committee, Sanghar, (ii). Town Committee, Tando Mitha Khan, (iii). Sanghat STC and (iv). Tandio Mitha Khan STC excluding Tepedar Circle Sadhno and Bahram Bari, (b) Tapedar Circle Rawtiani of Sinjhoro STC of Sinjhoro Taluka, (c). Tapedar Circle Shorki of Khadro STC of Sinjhoro Taluka of District Sanghar, PS-43 Sanghar-III comprised of (a) Jam Nawaz Ali Taluka, (b). Sethar Pee STC of Sanghar Taluka, (c). Town Committee Kandiari of Sanghar Taluka, (d). Town Committee Perumal of Sanghar Taluka, (e). Areas of Tapedar Circle Jhol, STC

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of Taluka Sinjhoro, (i). Bobi, (ii). Dham Rakhi, (iii). Lakha, (iv). Shafi Muhammad and (v). Thahim and (e). Area of Tapedar Circle of Tando Mitha Khan STC of Sanghar Taluka (i). Sadhno, (ii). Behram Bari of District Sanghar and PS-64 Sanghar-VI (a) Area of Sinjhoro Taluka, (i). Municipal Committee Sinjhoro, (ii). Town Committee, (vi). Khadro STC excluding Tapedar Circle Shorki, (v). Sinjhoro STC excluding Tapedar Circle Rawtiani, (vi). Tapedar Circle Jhole of Jhol STC, (vii). Tapedar Circle Duthro of Jhol STC, (viii). Tapedar Circle Rukkan Burira of Jhol STC and the area of Shahdadpur Taluka, (i). Town Committee Shahpurchkar, (ii). Shahpurchakar STC, (iii). Tapedar Circle Karamullah Dahri of Sarhari STC, and (iv). Tapedar Circle Bhaji of Shahdadpur STC of Sanghar District, which shows malafide on the part of delimitation committee, hence this representation on following grounds:-

## GROUNDS.

- 1. That, the principle of delimitation is for General seats according to Election Rules 2017 is that all constituencies for General seats shall as for as practicable be delimited having records to be distribution of Population in Geographical compact areas, Physical features, existing boundaries of Administrative units, facilities of communication and Public convenience and other cognate factors to ensure Homogeneity of constituencies.
- 2. That, it is also Principal of the delimitation of the constituencies of Provincial Assembly shall start from Northern of the District as the case of the agency and then clock's wise in Zigzag manner keeping in view that Population amongst constituencies of an assembly shall remain as close as may be practicable to the quota.
- 3. That, it is well settled Principle that at the time of preparing draft proposal of constituencies the delimitation

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committee shall follow the above principles of delimitation as laid down in rule and guidelines provided by the commission from time to time.

- That, Sanghar Taluka is situated in the northern side 4. of the District and it is Principle that the delimitation start from the northern of the District and due to northern side it was numbered as PS-41 Sanghar-I and the Population of Taluka Sanghar is 4,34,087. Whereas at the most 3,50,000 requires for each constituency of Sanghar District. But delimitation committee included TC Shorki of STC Khadro, Taluka Sinjhoro and TC Rawtiani of STC Sinjhoro Taluka in PS-41 Sanghar-I. Whereas STC Sithar Peer, TC Loharro and TC Dilshad and TC Bahram Bari of STC Tando Mitha Khan, Taluka Sanghar are adjacent as well as part and parcel of Taluka Sanghar knowingly and deliberately at time of preparation of excluded from PS-41 Sanghar-I delimitation/draft of PS-41 Sanghar-I, whereas TC Shorki STC Khadro and TC Rawtiani of STC Sinjhoro and Taluka Sinjhoro are already part and parcel of Taluka Sinjhoro be included in PS-46 and Town Committee Jhol and TC Jhol of STC Jhol is adjacent to PS-43 Sanghar-III be included in PS-43 Sanghar-III. As such the population of the all the three Provincial Assemblies will remain as Geographical compact areas, Physical feature, existing boundaries of existing units, facilities of communication and public convenience etc will also remain intact.
- 4. That, but in instant delimitation of PS-41, PS-43 and PS-46 of District Sanghar violates their rights of the dignity of applicant as well as voters of the said constituencies as enshrined under the Constitution of Islamic Republic of Pakistan and it is the right to demand political and democratic structure of process of electoral process conducted on equality, fairness and transparency.
- 5. That, instant delimitation of the constituencies PS-41,

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PS-43 and PS-46 of District Sanghar is in clear violation of existing laws, rules, principles and against will and objections of general public as well as principles of natural justice.

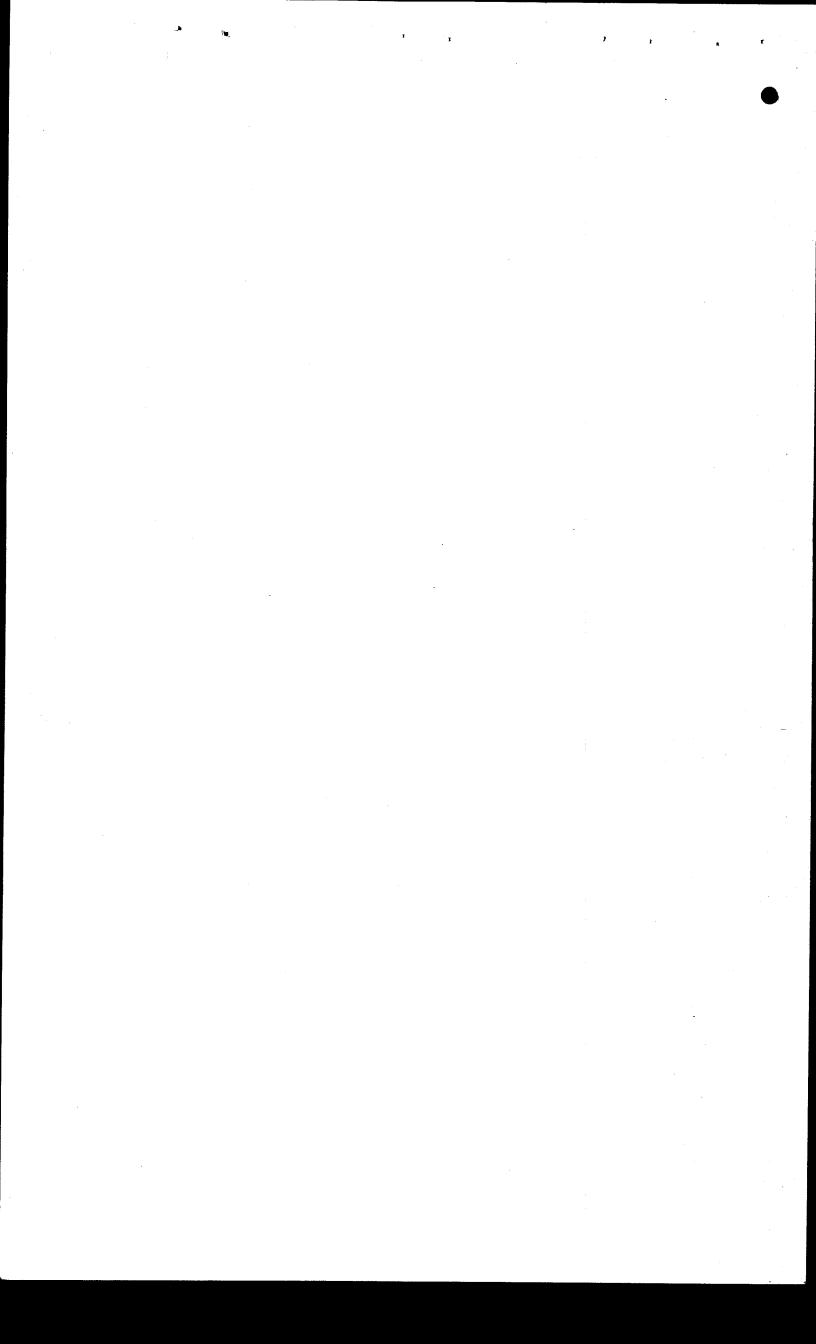
- 6. That, the map of constituencies of Provincial Assemblies of District Sanghar, in this regard is itself explanatory.
- 7. That, the instant delimitation of Provincial Assemblies for the District Sanghar is against the whole aim and purpose of delimitation. The delimitation is always conducted to ensure, fair, just and propitiation representation of the peoples in the elections, wherein the instant case it is vice-versa and contrary to the Principles.
- 8. That, the above delimitation of the constituencies of PS-41, PS-43 and PS-46 has radically are disturbed the consent of uniformities of administrative boundaries as well as principles laid down in the law, Constitution of Pakistan and Elections Act, 2017.
- 9. That, further grounds will be advance with the permission of Commission at time of hearing of the representation.

It is, therefore, submitted that constituencies PS-41, PS-43 and PS-46 of Sanghar District be carried out in the manner prescribed in following table and same may be confirmed under section 20 of the Election Act, 2017.

SCCHOIL 20 C		
PS-41	(a).The following areas of Taluka	75,410.
Sanghar-I.	Sanghar. (i).Municipal Committee, Sanghar.	5,218.
	(ii). Town Committee, Tando Mitha Khan.	1,67,374.
	<ul><li>(iii).Sanghar STC.</li><li>(iv). Tandio Mitha Khan STC excluding</li><li>Tepedar Circle Sadhno.</li><li>(b). Tapedar Circle Loharraro.</li><li>(c) Tapedar Circle Dilshad of STC</li></ul>	80,710. 10,810. 12,280.
	Sethar Peer, Taluka Sanghar.  Total.	3,51,802.

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DC	40	Khipro Taluka of District Sanghar.	3,33,284.
PS-	-42 nghar-II.	Total.	
Jai	igitai -11.	Total.	
			1,53,342.
i i	-43	(a) Jam Nawaz Ali Taluka.	1,00,042.
Sa	nghar-III	(a) Jain Nawaz / In Taraka.	58,785.
		(b) . Sethar Pee STC of Sanghar Taluka	
		excluding TC Dilshad and	
		Laharraro.	9,830.
		(c) Town Committee Kandiari of	
	* *		3,326.
		Sanghar Taluka. (d) (d). Town Committee Perumal of	3,020.
		Sanghar Taluka.  (e) The following areas Tapedar Circles	
		of Jhol, STC of Taluka Sinjhoro.	
			13,375.
1		(i). Bobi.	14,651. 15,280.
		(ii). Dham Rakhi.	7,091.
		(iii). Lakha.	12,987.
		(iv). Shafi Muhammad and	12,101.
		(v). Thahim and	21,787.
		(vi). Jhol.	
		(f). Town Committee Jhol of Taluka	10,344.
		Sinjhoro and	10,344.
		(g). Tapedar Circle Sadhano of Tando	Total.3,32,899
		Mitha Khan STC of Sanghar Taluka.	
		— I I I al District	
T	PS-44	Tando Adam Taluka of District	Total.3,57,919.
1 -	Sanghar-	Sanghar.	
	V.		
		or to the Table and in other	
	PS-45	Shahdadpur Taluka excludingthe	
3	Sanghar-V		
		(i). Town Committee Shahpurchakar.	
		(ii).Shahpurchakar STC.	
-		(iii). Tapedar Circle of Karamullah	
	•	Dahri of Sarhari STC and	Total.3,35,666.
		(iv). Tapedar Circle Bhaji of	
		Shahdadpur STC of District Sanghar.	
		) The City is a second Cinihoro	
	PS-46	a). The following area of Sinjhoro	19,711.
	Sanghar-	Taluka.	15,426.
	VI.	(i). Municipal Committee Sinjhoro.	65,273.
		(ii). Town Committee Khadro.	
		(iii). Khadro STC.	84,771.
		(iv). Sinjhoro STC.	14,808.
		(v). Tapedar Circle Duthro and	23,613.
		(vi). Tapedar Circle Rukkan Burira of	
		Jhol STC and	



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b) The following areas of Shahdadpur Taluka. (i). Town Committee Shahpurchkar. (ii). Shahpurchakar STC. (iii). Tapedar Circle Karamullah Dahri of Sarhari STC and	33,907. 59,270. 13,429 15,279.
(iv). Tapedar Circle Bhaji of Shahdadpur STC of Sanghar District Total.	Total 3,45,487.

## PRAYER.

It is, therefore, prayed that the representation of applicant may be allowed and Delimitation of the District Sanghar for the Constituency of Provincial Assembly be carried out as per proposals given supra, in the larger interest of Justice.

ISLAMABAD.

APPLICANT.

DATED:-2-04-2018. (AAMER ALI S/O MUHAMMAD HABIB) Gill.

