# IN THE ELECTION COMMISSION OF PAKISTAN AT ISLAMABAD

REPRESENTATION NO. \_\_\_ OF 2018

In the matter of Delimitation of Constituencies:

ChandaRam,

CNIC No. 41207-9472060-1 Resident of Street 1 Mohalla Tewani, Thano Bula Khan, Tehsil Thano Bula Khan.

....PETITIONER

# REPRESENTATION UNDER SECTION 21 OF THE ELECTIONS ACT, 2017 READ WITH RULE 12 OF THE ELECTION RULES 2017 AGAINST THE DELIMITATION OF PROVINCIAL ASSEMBLY CONSTITUENCIES PS-80, PS-81 & PS-82 OF DISTRICT JAMSHORO, SINDH

Being aggrieved and dis-satisfied with the delimitation proposal dated 05.03.2018 notified by Hon'ble ECP for the Provincial Assembly seats of District Jamshoro, the Petitioner submits the instant Representation on the following facts & grounds:

#### **GROUNDS:**

1. That the total population of District Jamshoro is 993,142 people and as per the formula adopted by ECP under the applicable laws, a total of three (03) Provincial Assembly seats have been allocated to District Jamshoro. In the proposal published by ECP, following is the population breakup of the three constituencies:

Constituency	Area	Population
K	Sehwan Taluka	269,291
PS-80	TC Sann, Manjhand Taluka	12,745
Jamshoro-I	Manjhand STC w/o Tapedar Circle	56,899
	1 7	<u>8,467</u>
	Lakhri T. Gammittee Manihand	347,402
	Town Committee, Manjhand  Total	
50.04	Thano Bhula Khan Taluka	145,450
PS-81		85,033
Jamshoro-II	Bada STC, Kotri	34,420
	TC Jamshoro, Kotri Taluka	55,242
	Unerpur STC, Manjhand Taluka	7,487
	Tapedar Circle Lakhri, Manjhand	327,632
	STC	32.,332
	Total	
PS-82	Kotri Taluka w/o Bada STC & TC	210 100
Jamshoro-II	Jamshoro	<u>318,108</u>
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2. That Taluka Thano Bula Khan is a part of District Jamshoro, which as per the notified Census results, has a population of 145,450 people. As per the preliminary proposal regarding delimitation of constituencies published by the ECP, Taluka Thana Bula Khan has been linked to Taluka Manjhand.

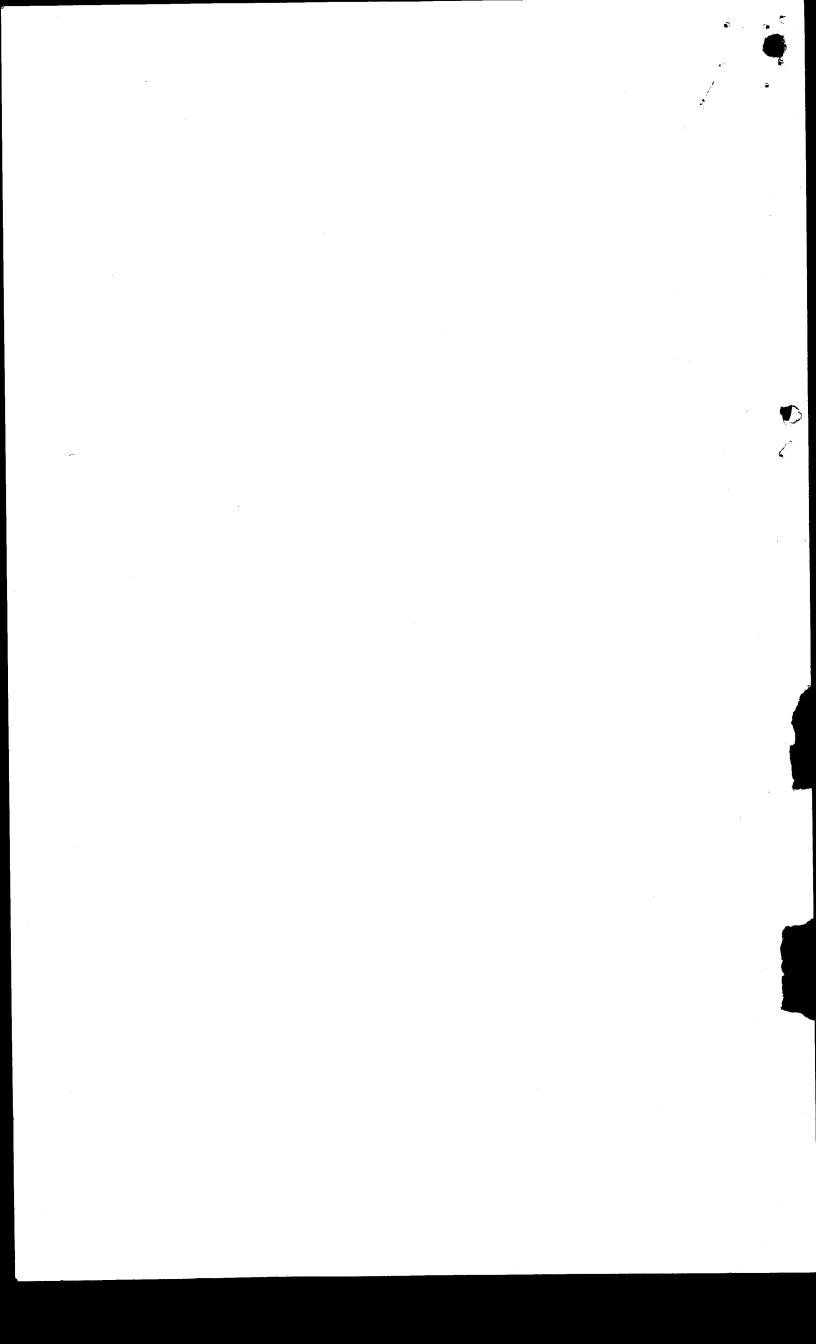
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- 3. That there is also no physical connection between Taluka Manjhand & Thano Bhula Khan. Both the Talukas are naturally divided by mountains, and there is no road network directly connecting the two Talukas.
- 4. The existing road network connects Taluka Thano Bula Khan to Taluka Kotri at Municipal Committee Bolhari and TC Bolhari.
- 5. That keeping in view the principle of public convenience as well as geographical, historical and physical contiguity, the delimitation should be as per proposal contained in Para 6 of this representation.

## PROPOSAL:

6. That for the reasons that have been highlighted above, the following proposal is submitted for the approval of ECP:

No. and Name of	Extent of Constituency	Population
Constituency	2xtent of Constituency	ropulation
PS-80	a) Sehwan Taluka	269,291
Jamshoro-1	b) Town Committee Sann of	207,291
	Manjhand Taluka	12,745
	c) The following TCs of	12,740
	Manjhand STC of Taluka	
	Manjhand	
	(i) Laki TC	12,209
	(ii) Chachar TC	10,067
	(iii) Sann TC	10,586
	Total:	314,898
PS-81	a) Taluka Manjhand	011,000
Jamshoro-II	excluding:	
	(i) Town Committee	
	Sann of	
	Manjhand Taluka	
	(ii) The following TCs of	
	Manjhand STC of	
	Taluka Manjhand	
	• Laki TC	
	Chahchar TC	95,233
· .	Sann TC	85,033
	b) STC Bada of Taluka Kotri	101,134
	c) MC Kotri	34,420
	d) Town Committee Jamshoro	16,431
	e) Kotri TC of STC Kotri	
	Total:	332,251
PS-82	a) Taluka Thano Bula Khan	145,450
Jamshoro III	b) MC Bolhari	158,224
	c) Following TC of STC Kotri	
	of Taluka Thano Bula Khan:	
	(i) Bolhari TC	40,491
	(ii) Raheer TC	902
	(iii) Vee TC	926
	Total:	345,993



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# (Copy of Map proposed by the Applicant is enclosed as Annexure "A")

7. That the variation between the seats as proposed above with the highest and lowest population is 8.99% which is within the limit contained in the applicable laws. Moreover, the above arrangement comprises of areas, which are geographically contiguous with the best possible communication network amongst them. Furthermore, it is also closest to the previous delimitation done in the year 2002 thus facilitating the voters & more importantly electoral process in the respective constituencies.

### PRAYER:

In light of the above, the Hon'ble Election Commission of Pakistan may be pleased to set aside the preliminary delimitation of constituencies of Provincial Assembly of Sindh in respect of District Jamshoro and accept the proposal submitted as hereunder (Annexure A) as final list of Provincial Assembly constituencies for District Jamshoro, Sindh.

DATED: 02.04.2018

PETITIONER

# **VERIFICATION**

I, Chand RamS/o Hoto Mal, adult, resident of street 1 Mohalla Tewani, Taluka Thano Bula Khan, District Jamshoro, do hereby state on oath that whatever is stated hereinabove is true and correct to the best of my knowledge and belief.

Verified at Islamabad on the \_\_ day of April, 2018

DEPONENT

ADVOCATE

# Annexures:

Map of Delimitation Proposed by Petitioner (Annexure A)
Copy of CNIC (Annexure B)
Copy of Voter Extract (Annexure C)
Vakalatnama (Annexure D)

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