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IN THE ELECTION COMMISSION OF PAKISTAN AT ISLAMABAD

REPRESENTATION NO. \_\_\_ OF 2018

In the matter of Delimitation of Constituencies:

Pandhi Khan Mesoo,  
CNIC No. 41204-0956961-3  
Resident of Village Jan Mohammad Mesoo,  
Dak Khana Unarpur, Tehsil Manjhand.

Anwar Ali Manjhand  
CNIC No. 42201-6950377-3  
Resident of Manjhand,  
Tehsil Manjhand.

Handwritten signature and date: 02/04/2018  
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.....PETITIONERS

**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 ECP for the Provincial Assembly seats of District Jamshoro, the Petitioners submit the instant Representation on the following facts & grounds:

**GROUND:**

1. That Taluka Manjhand is a part of District Jamshoro, which as per the notified Census results, has a population of 140,840 people. As per the preliminary proposal regarding delimitation of constituencies published by the ECP, Taluka Manjhand has been divided into two (02) parts. While one part of Manjhand having a population of 78,111 (55% of the entire Taluka) has been made part of proposed PS-80 (previously PS-73), the remaining part with a population 62,729 (44.50% of the entire Taluka) has been made part of the proposed PS-81 (previously PS-72).
2. That if one looks at the historical perspective of Taluka Manjhand, one would notice that Manjhand was given the status of Taluka in the year 2005 and until 2005, Manjhand had remained part of Kotri Taluka. In this regard, it is imperative to state here that Manjhand as a Taluka has only been carved out of Kotri. Therefore, there is a great deal of historical, cultural & physical connection between Manjhand & Kotri but also homogeneity in both these areas. Needless to mention here that in all of the previous elections, major portion of Manjhand & Kotri were part of the same Provincial Assembly constituency.
3. That as per the proposal, almost half of Taluka Manjhand has been made part of PS-81, which predominantly comprises of Taluka Thano Bhula Khan. Besides, having no historical connection with Thano Bhula Khan, another important aspect which seems to have missed the attention of ECP is the fact that there is also no physical connection between Taluka Manjhand & Thano Bhula Khan. It is most pertinent to mention here that both the Talukas are naturally divided by mountains and interestingly, there is no road network directly connecting the two Talukas. This can be further fortified from the fact that a person from Thano Bhula Khan to reach Taluka Manjhand would have to first exit District Jamshoro, enter District Thatta, get onto Super Highway, then enter Kotri (PS-82), to finally get access to Taluka Manjhand. This fact is also confirmed by letters from the office of Deputy Commissioner, Jamshoro & Executive Engineer Highways, Jamshoro.



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(Copies of Elevation Map of Jamshoro and letters are enclosed as Annexures "A", "B" & "B/1")

4. 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 break-up of the three (03) constituencies:

Constituency	Area	Population
PS-80 Jamshoro-I	Sehwan Taluka	269,291
	TC Sann, Manjhand Taluka	12,745
	Manjhand STC w/o Tapedar Circle Lakhri	56,899
	Town Committee, Manjhand	8,467
	<b>Total</b>	<b>347,402</b>
PS-81 Jamshoro-II	Thano Bhula Khan Taluka	145,450
	Bada STC, Kotri	85,033
	TC Jamshoro, Kotri Taluka	34,420
	Unerpur STC, Manjhand Taluka	55,242
	Tapedar Circle Lakhri, Manjhand STC	7,487
	<b>Total</b>	<b>327,632</b>
PS-82 Jamshoro-II	Kotri Taluka w/o Bada STC & TC	318,108
	Jamshoro	318,108
	<b>Total</b>	<b>318,108</b>

(Copy of Map of District Jamshoro showing the Provincial Assembly seats proposed by ECP is enclosed as Annexure "C")

5. That a perusal of the above clearly shows that all the four (04) Talukas of District Jamshoro have been broken up in haphazard manner and also in deviation of the principles of delimitation contained in Section 20 of The Elections Act, 2017 as well as numerous judgments enunciating similar principles.
6. That keeping in view the principle of public convenience as well as geographical, historical and physical contiguity, the major portion of Taluka Manjhand should be part of PS-82 and the remaining portion should be added into PS-80 (in order to complete the population numbers for PS-80) and consequently renumbered. The exact bifurcation is stated in the proposal contained in Para 8 of this representation.

**PROPOSAL:**

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

No. and Name of Constituency	Extent of Constituency	Population	
PS-80 Jamshoro-1	a) Sehwan Taluka	269,291	
	b) Town Committee Sann of Manjhand Taluka	12,745	
	c) The following TCs of Manjhand STC of Taluka Manjhand	(i) Laki TC	12,209
		(ii) Chachar TC	10,067
		(iii) Sann TC	10,586
	<b>Total :</b>	<b>314,898</b>	
PS-81 Jamshoro-II	a) Taluka Manjhand excluding: (i) Town Committee Sann of Manjhand Taluka		



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	(ii) The following TCs of Manjhand STC of Taluka Manjhand	
	• Laki TC	
	• Chahchar TC	
	• Sann TC	95,233
	b) STC Bada of Taluka Kotri	85,033
	c) MC Kotri	101,134
	d) Town Committee Jamshoro	34,420
	e) Kotri TC of STC Kotri	16,431
	<b>Total :</b>	<b>332,251</b>
PS-82 Jamshoro III	a) Taluka Thano Bula Khan	145,450
	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
	<b>Total :</b>	<b>345,993</b>

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

8. 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.
9. That it is most pertinent to mention here that even at the time of the last delimitations which took place in the year 2002, the major portion of Manjhand was initially aligned with Taluka Thano Bhula Khan in the preliminary delimitation to create PS-72. In this regard, reliance is placed upon the preliminary report on delimitation of constituencies published on 26.03.2002. However, upon objections made by residents of Manjhand, the constituencies were re-aligned resulting in Manjhand getting detached from Taluka Thano Bhula Khan. In this regard, reliance is placed upon the final delimitation, which was published in the Gazette of Pakistan dated 28.06.2002.

(Copies of Gazette Notification, Proposed & Final of 2002 as well as Proposed, & Final Map are enclosed as Annexures "E" to "E/3")

**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 D) as final list of Provincial Assembly constituencies for District Jamshoro, Sindh.

DATED: 02.04.2018



PETITIONERS

VERIFICATION

I, Pandhi Khan Mesoo S/o, Mohammad Umer Mesoo adult, Muslim & resident of Village Jan Mohammad Mesoo, Taluka Manjhand, District Jamshoro, do hereby state on oath that whatever is stated hereinabove is true and correct to the best of my knowledge and belief.

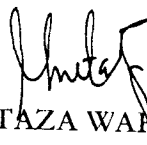


Verified at Islamabad on the \_\_\_ day of April, 2018

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2/04/2018



DEPONENT



MURTAZA WAHAB  
BARRISTER-AT-LAW

**Annexures:**

- Elevation Map of District Jamshoro (Annexure A)
- Letter of Deputy Commissioner, Jamshoro (Annexure B)
- Letter of Executive Engineer Highways, Jamshoro (Annexure B/1)
- Map of Delimitation Proposed by ECP (Annexure C)
- Map of Delimitation Proposed by Petitioner (Annexure D)
- Copy of Gazette Notification of Preliminary Delimitation in 2002 (Annexure E)
- Copy of Gazette Notification of Final Delimitation in 2002 (Annexure E/1)
- Map of Preliminary Delimitation in 2002 (Annexure E/2)
- Map of Final Delimitation in 2002 (Annexure E/3)
- Copy of CNIC (Annexure F)
- Copy of Voter Extract (Annexure G)
- Vakalatnama (Annexure H)

