

The Secretary  
Election Commission of Pakistan,  
Islamabad

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AA/02/04/2018  
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SUBJECT: OBJECTION ON THE PROPOSED DE-LIMITATIONS NOTIFIED BY THE COMMISSION ON 05-03-2018 PS 85 DADU III PROVINCE OF SINDH.

R/Sir,

We the following voters of the area affected by the above proposed de-limitation of PS 85 Dadu III respectfully make the following objections for the kind consideration of this Honorable Commission.

MEMORANDUM

I am the registered voter in the Electoral Area 352030503 falling in Deh Kalhora Tappa Additional Khudabad of Supervisory Tapedari Circle Badani of Taluka Dadu beg to submit as under

1. That I belong to the village Khair Muhammad Panhwer of Deh Kalhora, Additional khdabad Tappa of supervisory Tapedari Circle Badani taluka & District Dadu, Sindh.
2. That I and the other voters of my Tapa and Circle have been casting their votes since our forefathers to the candidates contesting elections from the Provincial Assembly Seat comprising the whole Dadu taluka in the General Election from 1977 till 2002. The said Provincial Seat also consisted of one Administrative Unit of Taluka Dadu of District Dadu, Sindh.
3. That it was only in year 2002 that our STC Badani taluka Dadu was excluded from the old constituency consisting of Dadu taluka and was included to the provincial seat of Sehwan and continued till the last elections held in 2013.
4. That the above change/exclusion of our STC Badani from Dadu taluka had caused us a great inconvenience due to the lack of facilities of communication and Public Convenience and has disturbed the whole geographical compactness and physical features of our long standing administrative boundaries of our taluka Dadu.
5. That from 1988 to 1997 we had been casting our votes as usual within the administrative unit of Dadu Taluka and were fully



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satisfied having easy access to our elected representative for the resolution of our problems.

6. That in the General Elections 2002 our STC Badani was excluded from our historical and traditional Provincial Assembly of Sindh Seat 74 Dadu and included to PS 73 Sehwan causing us a great inconvenience from every aspect.
7. That we took a sigh of relief by knowing that this time the Election Commission of Pakistan has kept the constituencies of all the Districts within their Boundary limits and discarded their overlapping with the constituencies of their adjoining Districts but to our utter distress the Delimitation Proposals of newly formed Constituency PS 85 Dadu III notified by the Commission has again thrown away Five out of Seven Tapas of our STC Badani Taluka Dadu into PS 86 of Johi Taluka instead of the established criteria of Delimitation to distribute the required population to the constituencies with less population starting from North to South as has been done in the other two constituencies of the same District i.e. PS 83 and PS 84 Dadu 1 and 2 respectively vide the notified Proposals Dated 5.3.2018. Hence this Memorandum with the following Objections:

### **OBJECTIONS**

The perusal of the map of Dadu district received by me from the commission showing the delimitation of the Provincial Assembly Constituency 85 and 86 Dadu III and Dadu IV respectively has given rise to the following objections by the undersigned voters from STC Badani Taluka Dadu District Dadu Province of Sindh.

1. That the distribution of population in the same district has been done with different yard sticks
2. That in case of PS-84 Dadu II the distribution of the population has been made from North and included Southwards to PS-83 Dadu I
3. That is clear disregard to the above criteria, the distribution of population in case of PS-85 Dadu III has been made from South to the Northward, which has caused the following violations of the principles of delimitation enunciated in Section 20 sub-section I of the election Act 2017.
  - a. The geographical compactness has been ignored as the five Tapas of STC Badani out of which three tapas namely 1) Badani, 2) Khudabad and 3) Additional Khudabad have no border compactness with Johi taluka PS-86 Dadu IV.
  - b. That there are no facilities of communication and public convenience of the above mentioned STC Badani Taluka and District Dadu nor there is any easy access for the voters of our above mentioned three tapas of STC Badani, hence their inclusion in PS-86 Dadu IV is extremely against



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- the principles of delimitation as laid down in sub-section (1) of section 20 of the Election Act 2017
- c. That the proposed delimitation of PS-85 Dadu III has adversely affected rather distorted the physical features of the said constituency.
  - d. That among the other cognate factors ensuring the Homogeneity of PS-85 Dadu III is completely absent so much so the above mentioned three tapas namely 1) Badani, 2) Khudabad and 3) Additional Khudabad of STC Badani have no geographical borders with PS- 86 Dadu IV ( formerly PS- 75).

  
PETITIONER

Dated:

### VERIFICATION

I, Nazeer Ahmed Panhwer s/o Mehmood khan Panhwer , adult, muslim , resident of Village Khair Muhammad Panhwer, Taluka and District Dadu do hereby state on oath that whatever is stated herein above in the grounds and facts of the representation is true and correct to the best of my knowledge and belief.

Verified at Islamabad. This the    day of    2018.

  
Deponent

Advocate

### DOCUMENTS FILED

1. Proposal for final list of constituencies                          Annexure A
2. Preliminary proposal of Delimitation Committee Annexure B
3. Certificates of Highways Department                                  (to be filed on the day of  
hearing)
4. Map of proposed constituencies.    Annexure D

### DOCUMENTS RELIED UPON

1. Any other Document in rebuttal.

Dated: .03.18

  
PETITIONER

