

TO,  
THE SECRETARY,  
ELECTION COMMISSION OF PAKISTAN ISLAMABAD

REPRESENTATION NO. OF 2018

①

Pir Mujeeb ul Haq  
s/o Pir Mazhar ul Haq, adult, muslim,  
resident of Pir Colony, Dadu,  
Taluka and District Dadu, Sindh.....Petitioner

Versus

The Delimitation Committee Sindh.....Respondent

102/04/2018  
1-15

**REPRESENTATION UNDER RULE 12 OF THE ELECTION RULES 2017  
AGAINST THE DELIMITATION OF PROVINCIAL ASSEMBLY SINDH  
CONSTITUENCY IN DISTRICT DADU**

Being aggrieved and dissatisfied with the delimitation proposal dated 05th March 2018 notified by the delimitation committee Sindh for the Provincial Assembly of Sindh for District Dadu viz. PS 83 Dadu I, PS 84 Dadu II, PS 85 Dadu III and PS 86 Dadu IV, the Petitioner above named respectfully submits his representation ; praying inter alia therein that Honourable Election Commission of Pakistan may be pleased to call for the record and proceedings to the extent of the above constituencies and may be pleased to check the legality, propriety, validity and correctness of the proposed delimitation and may further be pleased to alter and modify the proposed constituencies of the Provincial Assembly of Sindh viz. PS 83 Dadu I, PS 84 Dadu II, PS 85 Dadu III and PS 86 Dadu IV, and finalise the delimitation of the above constituencies by



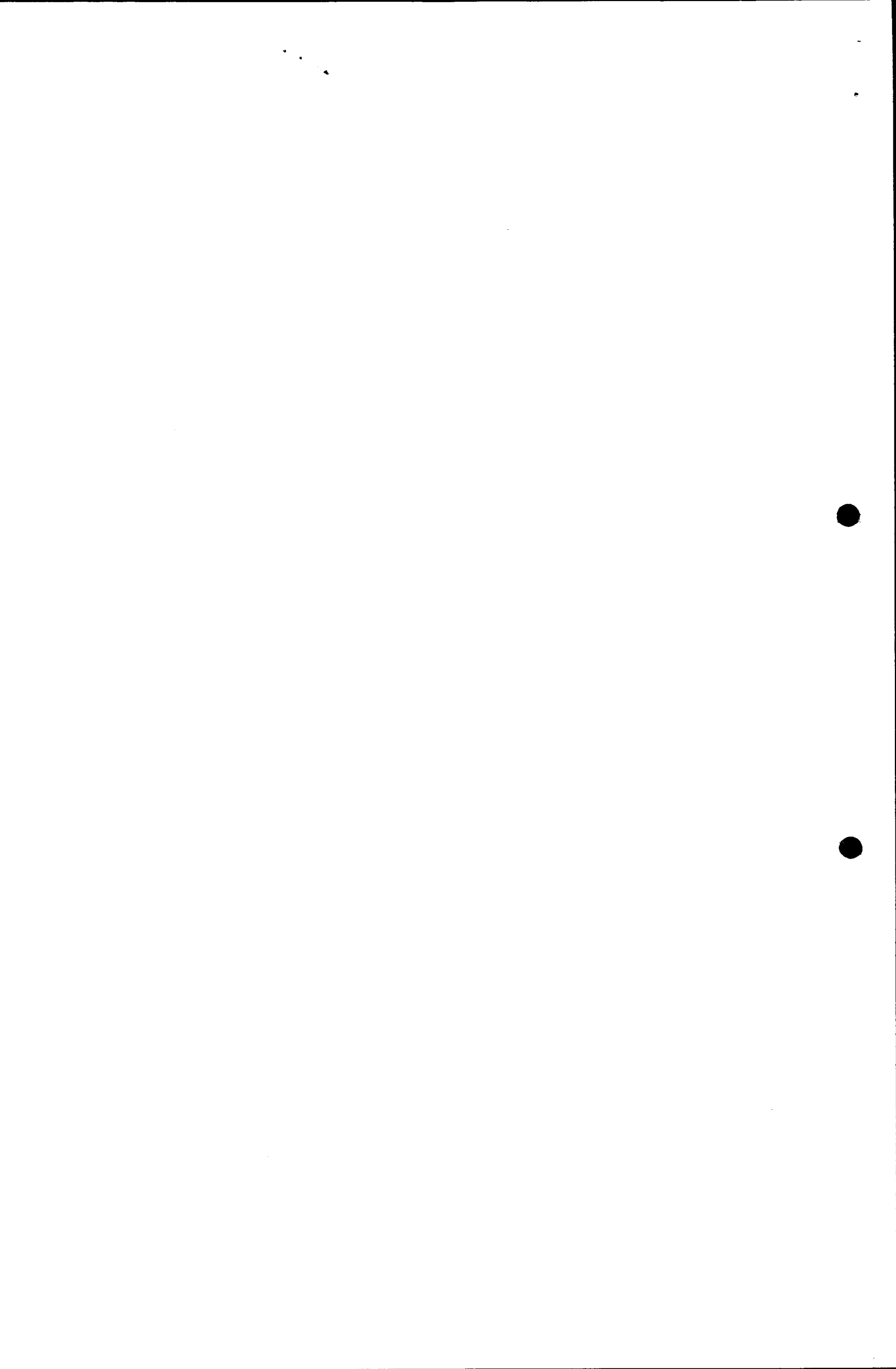
accepting the proposal filed by the Petitioner taking into consideration of the following facts and grounds:

(B)  
11/02/04/2018

**FACTS**

The brief facts leading to this representation are that the delimitation Committee Sindh made the following initial proposals for delimitation of Constituency of Provincial Assembly of Sindh in District Dadu.

No & Name of Constituency	Extent of the Constituency	Population
PS- 83 Dadu- I	a) Khairpur Nathan shah Taluka and	334,258
	b) The following Tapedar Circles of Mangwani STC of Mehar Taluka:-	
	i) Addl. Faridabad,	
	ii) Faridabad,	8,430
	iii) Garkan,	
	iv) Addl: Mangwani	18,367
	v) Addl: Garkan no. 1	6,399
	vi) Addl: Garkan no. 2 and	6,984
vii) Mangwani	6,894	
	of District Dadu	8,159
		12,614
	<b>Total:</b>	<b>402,105</b>



M 02/04/2018 (5)

PS- 84 Dadu- II	a) Mehar Taluka excluding the following Tapedar Circles of MangwaniSTC:- i) Addl: Faridabad, ii) Faridabad, iii) Garkan, iv) Addl: Mangwani v) Addl: Garkan no. 1 vi) Addl: Garkan no. 2 and vii) Mangwani of District Dadu	392,832
	<b>Total:</b>	<b>392,832</b>
PS- 85 Dadu- III	Dadu Taluka excluding the following Tapedar Circles of Badani STC i) Addl: Bakhrani ii) Addl: Khudabad iii) Badani iv) Bakhrani and v) Khudabad of District Dadu	380,442
	<b>Total:</b>	<b>380,442</b>



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PS- 86 Dadu- IV	Johi Taluka and	294,848
	The following Tapedar Circles of	
	Badani STC of Dadu Taluka	
	i)Addl: Bakhrani	13,796
	ii)Addl: Khudabad	12,887
	iii)Badani	18,186
	iv)Bakhrani and	17,870
v)Khudabad	17,300	
of District Dadu		
	<b>Total:</b>	<b>374,887</b>

The Petitioner above named respectfully submits his proposal for acceptance attached as Annexure (A) on consideration of the following amongst other grounds:

**GROUND**

1. That the Petitioner is a registered voter of ward No. 22 of the Municipal Committee Dadu, Taluka and District Dadu and is currently an Elected Member of the Provincial Assembly of Sindh from this constituency PS- 74, presently (proposed) PS- 85 Dadu III.
2. That my Father was elected from this constituency in the General Elections 1988-90, 1990-93, 1993-96, 1997-99 & 2008-13.
3. That my Sister Ms Marvi Mazhar was elected as MPA from the same PS 74 Dadu in General Elections 2002.





9/02/09/2018 (9)

4. That in view of the above submissions I am entitled to make this representation for alterations in the preliminary proposals of the delimitation Committee.
5. That the preliminary proposal of delimitation for Provincial Assembly seats in District Dadu has been issued while ignoring the guidelines given in section 20 of the Election Act 2017 and Rules 7, 8, 9 and 10 of the Election Rules 2017.
6. That I and the other voters of the Dadu Taluka have been casting their votes since our forefathers to candidates contesting elections for the Provincial Assembly seat comprising the whole Dadu Taluka of District Dadu from 1977 till 2002 of this Provincial assembly seat i.e. Old PS 60, changed into 74 with the delimitation notified for the General Elections 2002 till 2013 and the proposed PS 85 Dadu III falling within the administrative unit of Dadu Taluka the people were fully satisfied having easy access to our elected representatives including me, for the resolution of their problems during all these past tenures of the Provincial Assembly of Sindh.
7. That the Delimitation Committee has proposed the constituencies for Provincial Assembly of Sindh in the District Dadu keeping aside the existing boundaries of geographically compact areas, physical features of the area, as the proposed constituencies mostly cover rural areas, the conveyance is a major issue with the population residing in these areas, the facilities of communication and public convenience has also been ignored.



9/02/04/2018 (11)

8. That the geographical area of Johi Taluka in proposed PS 86 is almost more than double of the area of Taluka Dadu, therefore it will be difficult to cover and reach out to far flung parts of Taluka Johi let alone giving it further part of Dadu Taluka. It is submitted that it would be convenient for all concerned if the Taluka Boundries of Dadu and Johi Talukas remain intact keeping in mind the criteria of geographical area as laid down in the Election law and Rules.
9. That the equalization of population among the Provincial Assembly seats of Sindh is one of the criteria but geographical compactness and communication and convenience of the population are also equally important but they have been ignored completely.
10. That the criteria of equalization has not been adhered to strictly among the Districts and variation of more than 10% exists if the constituencies are compared amongst other Districts like Thatta and Jamshoro, therefore keeping in mind the vast geographical area of Taluka Johi, if it is given additional population from Taluka Dadu it will cause hardship for public to access their representative.
11. That in case of PS-84 Dadu II the distribution of the population has been done from North to southwards to include into PS-83 Dadu I.
12. That in 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.



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13. That the proposed constituencies have been made without ascertaining the ground realities therefore the entire exercise has been made to put public under huge disturbance.
14. That the General Elections from 1985 to 1997 the voters of Dadu taluka had been casting their votes as usual within the administrative unit of Dadu Taluka and were fully satisfied having easy access to their elected representatives including me, for the resolution of their problems.
15. That the proposed delimitation of PS-85 Dadu III has adversely affected rather distorted the physical features of the said constituency i.e. PS-85 Dadu III (formerly PS 60 and 74).
16. That the population criteria under the delimitation proposal given by me also suits the principles of Delimitation laid down in Section 20 of the Election Act 2017.
17. That I have submitted proposal after making proper ground surveys and have taken into consideration all relevant factors as envisaged under section 20 of the Election Act 2017 and the Rules there under.
18. That the marked maps of the constituency are also attached.
19. That I seek indulgence of the Honourable Commission to urge more grounds from the record at the time of hearing of this Representation.

I therefore respectfully pray as under:

**PRAYER**

- A. That the Honourable Election Commission of Pakistan may be pleased to set aside the preliminary Delimitation of the









**DOCUMENTS RELIED UPON**

1. Any other Document in rebuttal.

Dated: .04.18

*Mujeeb*  
PETITIONER

Drafted and drawn by me under the instructions of Petitioner

ADVOCATE FOR THE PETITIONER

Office Address:

**Annexure A****Proposal of constituencies by the petitioner**

No & Name of Constituency	Extent of the Constituency	Population
PS- 83 Dadu- I	a) Khairpur Nathan shah Taluka and b )The following Tapedar Circles of Mangwani STC of Mehar Taluka:- i) Addl. Faridabad, ii) Faridabad, iii) Garkan, iv) Addl: Mangwani v) Addl: Garkan no. 1 vi) Addl: Garkan no. 2 and vii) Mangwani of District Dadu	334,258  8,430 18,367 6,399 6,984 6,894 8,159 12,614



	<b>Total:</b>	<b>402,105</b>
PS- 84 Dadu- II	a) Mehar Taluka excluding the following Tapedar Circles of Mangwani STC:- i) Addl: Faridabad, ii) Faridabad, iii) Garkan, iv) Addl: Mangwani v) Addl: Garkan no. 1 vi) Addl: Garkan no. 2 and vii) Mangwani of District Dadu	392,832
	<b>Total:</b>	<b>392,832</b>
PS- 85 Dadu- III	Dadu Taluka.	460,481
	<b>Total:</b>	<b>460,481</b>



PS- 86 Dadu- IV	Johi Taluka.	294,848
	<b>Total:</b>	<b>294,848</b>

