

BEFORE THE ELECTION COMMISSION OF PAKISTAN
THROUGH THE HONOURABLE SECRETARY, AT ISLAMABAD

Zohaib Ali Tunio
son of Shah Muhammad Tunio,
Resident of Tapedari Circle
Noorpur Riasat, Taluka Sobhodero,
District Khairpur, Census Block
Number:335010611

.....

Objector

versus

Delimitation Committee Sindh

**REPRESENTATION FILED UNDER SECTION 21(3) OF THE
ELECTIONS ACT, 2017 READ WITH RULE 12 OF THE
ELECTION RULES 2017**

Humbly Sheweth:

Being aggrieved and being dissatisfied by the Preliminary List of delimitation of Provincial Constituencies pertaining to District Khairpur that are PS-26 to PS-32, Sindh, the objector named above prefers to file this instant representation on the following facts and grounds amongst others:

Copies of the Preliminary List of Constituencies and Map duly attested by the ECP are filed herewith and marked as Annexure "O-1" & "O-2".

FACTS

1. That the objector named above is a law abiding citizen of Pakistan and permanent resident of Taluka Sobhodero, District Khairpur. The objector has always strived in his entire life to serve the constituents of his district and has worked hard for their betterment, by partaking in the democratic political process which is enshrined in the Constitution of Islamic Republic of Pakistan, 1973 (Constitution, 1973).

2. That according to the Constitution, 1973 the present government will complete its tenure of five (05) years in the current year, hence, the general elections shall take place this year i.e. 2018.

3. That under Section 14(1)(a) of the Elections Act, 2017 (Act, 2017) the first measure to be taken by the Election Commission of Pakistan (ECP) under the comprehensive Action Plan is the delimitation of constituencies. The block wise provisional summary results of sixth population and housing census 2017 was published on 03.01.2018 and by virtue of The Constitution (twenty-fourth Amendment) Act, 2017 (Amendment) the Election Commission of Pakistan (ECP) has to conduct the delimitation of constituencies on the basis of the provisional census results. That according to the Constitution, 1973 the number of provincial assembly seats, in the province of Sindh, are 130 (one hundred and thirty) which are elected directly through the ballot. Moreover by virtue of The Constitution (twenty-fourth Amendment) Act, 2017 the proviso of clause 5 of Article 51 of the Constitution, 1973 has been amended and is reproduced as under:

'Provided that for the purposes of the next general elections to be held in 2018 and bye-elections related thereto, the allocation shall be made on the basis of provisional results of 2017 which shall be published by the Federal Government.' (emphasis added)

4. That the population of the province of Sindh according the Provisional Census Results of 2017 is 4,78,86,051 (forty

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seven million eight hundred eighty six thousand and fifty one). This population is to be divided and balanced between the 130 (one hundred and thirty) provincial assembly Seats of the province.

5. That the Elections Act, 2017 (Act, 2017) has come in to force in Pakistan in order to amend, consolidate and unify laws relating to the conduct of election matters connected therewith or ancillary thereto.
6. According to section 2 (1)(xi) of the Act, 2017 the word 'constituency' has been defined: '*means a constituency delimited under this Act*' (emphasis added). Thus it is understood by the plain reading of the definition that all constituencies are to be delimited under the Act, 2017.
7. That Chapter III of the Act, 2017 deals with delimitation of constituencies and this Chapter consists of six sections, starting from section 17 to 22 of the Act, 2017. The delimitation of constituencies for the purpose of election to provincial assemblies is to be conducted under section 19 of the Act, 2017 by dividing the province into as many separate territorial constituencies as the number of general seats specified in Article 106 of the Constitution, 1973.
8. Under section 239 of the Act, 2017 the Election Commission has made the Election Rules, 2017 (Rules, 2017) and Chapter III Part A of the Rules, 2017 prescribes the procedure for the delimitation of constituencies for the purpose of this proposal. As mentioned above and according

to rule 8 (3) of the Rules, 2017 the quota per seat for the provincial assembly of Sindh comes up to 368,354.

9. If we read section 20(4) of the Act, 2017 in juxtaposition with Rule 8 of the Rules, 2017 then the range of the quota per each constituency of the Provincial Assembly of Sindh can vary from 331,518 to 405,189 and ideally a constituency must fall within this range. However if the limit of ten percent increases or decreases then the commission shall record reasons there of in the delimitation order.
10. That according to Rule 8 (4) of the Rules, 2017 the Commission shall determine and notify the share of a district or districts by dividing the total population thereof with the quota per seat of the provincial assembly. Provided that the fraction of more than 0.5 shall be counted as one seat and a fraction of less than 0.5 may be ignored.
11. That the population of District Khairpur is 2,405,523 and this population is to be divided by the quota per seat i.e. 368,354. The fraction result comes to 6.53. Therefore by following the Rules, 2017 the share of District Khairpur for the provincial assembly seats is 7 (seven) and the Election Commission of Pakistan through its Notification dated 15.01.2018 has also determined the abovementioned share in light of provisional results of population census, 2017.

Copies of the Provisional Census Results of District Khairpur and Notification dated 15.01.2018 are filed herewith and marked as Annexure "O-3" & "O-4".

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12. That at the very outset it is important and necessary to highlight the fact that the entire exercise of delimitation conducted by the delimitation committee is against the law as it has not delimited the constituencies of District Khairpur according to the tapedari circles mentioned in the provisional census results and surprisingly has conducted the delimitation exercise based upon the Notification dated 06.02.2017. This notification has created new tapedari circles in District Khairpur.

Copy of the Notification dated 06.02.2017
is filed herewith and marked as Annexure
"O-5".

13. That the delimitation committee has also not followed the first and foremost principle of delimitation that is laid in Section 20 of the Act, 2017 i.e. the delimitation has to be conducted has to be conducted having regard to the distribution of population in a geographically compact area as according to the preliminary list of constituencies the population of PS-32 Khairpur-VII is 323,684 and this number is below the permissible limit of 10 percent under the law. The delimitation committee has also not given any reasons thereof.

14. That the delimitation committee has also not followed the principles of delimitation in its full spirit as it has not taken in to consideration the historical boundaries whilst delimiting the constituencies of District Khairpur. This is apparent from the fact that the Sobhodero Taluka has completely been separated from Taluka Gambat and historically Taluka Sobhodero was part of Taluka Gambat.

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This means that their natural and political connection has always been together. The previous constituency of PS-34 consisted of both the Talukas of Gambat and Sobhadero. Therefore separating both the talukas completely is unfair and unjustified as the same shall divide communities of interest and will not ensure cultural homogeneity, which in turn is against the law.

15. That in order to achieve equality and uniformity of population in District Khairpur, its total population of 2,405,523 is to be divided by the share of 7 seats allocated to it and when the same is done then the population per provincial assembly seat in District Khairpur comes to 343,646 (this is the ideal quota per seat of District Khairpur). This is well within the range of the quota per seat as mentioned in paragraph No. 10 of this instant proposal.
16. That the delimitation of the 7 (seven) provincial assembly seats has to be conducted by the Delimitation Committee that is constituted under Rule 9, of the Rules, 2017 and it shall then make draft proposals for the delimitation of constituencies. In preparing the draft proposals the Delimitation Committee Under Rule 10 (3), of the Rules, 2017 shall follow the principles of delimitation as laid down in Section 20, of the Act, 2017. Furthermore, the Delimitation Committee, whilst delimiting the constituencies, is given guidance and is also put under an prohibition that a 'tapedari circle shall be the basic unit for delimitation' and it shall not be broken under any circumstances and that in

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case of urban areas a census circle shall not be broken under any circumstances.

17. That the Delimitation Committee in utter disregard of the rules has delimited the Khairpur District as it has started its delimitation process from Taluka Khairpur. This action taken by the delimitation committee is absolutely illegal as it was under a duty to follow the Rules, 2017. As mentioned in the preceding paragraph Rule 10(5) of the Rules, 2017 requires that the delimitation of a district must start from the Northern End of the district and according to the map of District Khairpur, it is apparent that the Northern End of District Khairpur is at Taluka Kingiri. Therefore the entire preliminary list of constituencies of District Khairpur, is not made according to law and the entire exercise conducted by the delimitation committee has become unlawful due to the reason that the delimitation of District Khairpur has started from Taluka Khairpur, whereas it should have started from Taluka Kingiri in accordance with the law.
18. That Taluka Nara is the largest taluka of district Khairpur and is the least populated. Taluka Nara is separated from all the talukas of district Khairpur through a vast area of desert terrain. Taluka Nara is connected to the other areas of district Khairpur via two roads, the Kotdidji to Nara road and the Thari to Nara road. However the delimitation committee without keeping the principle of 'public convenience in mind has merged taluka Nara with Taluka Faiz Gunj and both of these talukas have no mode of

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communication at all. Therefore it can be seen through the preliminary list of constituencies that the delimitation committee whilst delimiting the constituencies for district Khairpur has acted against the principles laid down under the Act, 2017.

19. That the Commission may accept this instant representation on the following grounds:

GROUND

- A. That the entire delimitation exercise conducted by the delimitation committee for district Khairpur is against the law as according to Rule 7 of the Rules, 2017 the Commission has to carry out the delimitation of constituencies on the basis of population in accordance with the last preceding census officially published. The delimitation committee has acted malafidely by creating constituencies in preliminary list of constituencies as per the notification dated 06.02.2017 as the same is unlawful and illegal. The illegal action of delimiting constituencies of district Khairpur under the new notification even though the same was not accepted by the Pakistan Bureau of Statistics, has tainted the entire delimitation exercise pertaining to District Khairpur as it appears that the delimitation exercise was only done in order to serve some vested interests of some individuals.
- B. The Principles of delimitation are laid down in section 20 of the Act, 2017 and are reproduced as under:

Principles of Delimitation:(1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact area, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies.

(2) for the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.

(3) As far as possible, variation in population of constituencies of an assembly.....shall not ordinarily exceed ten percent.

(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.

That the delimitation committee has delimited the constituencies of district Khairpur in utter disregard of the principles laid down in the section mentioned hereinabove as it has created constituencies with uneven population, against the existing boundaries, has not taken public convenience in mind and has not ensured homogeneity. Therefore the preliminary list is liable to be set aside.

- C. That the first and foremost principle of delimitation that is laid down in section 20 of the Act, 2017 is that delimitation has to be conducted having regard to the distribution of population in a geographically compact area. The framers of the Act, 2017 and the Rules, 2017, have made and have incorporated this principle as the most important principle

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for the delimitation process, specifically for the reason that it is follows and is based upon the well established rule of law that one person's voting power ought to be equivalent to another person, in simpler terms that 'one man equals one vote.' The delimitation committee has not followed this principle in true spirit hence the preliminary list is liable to be set aside.

D. That guidance has been provided to the Delimitation Committee under Rule 10 (5) which is reproduced as under:

'As far as possible, the delimitation of constituencies of an assembly shall from the northern end of the district, or, as the case may be, the agency and then proceed clock-wise in zigzag manner keeping in view that the population among the constituencies of an Assembly shall remain as close as may be practicable to the quota.'

The Delimitation Committee has to interpret and strictly apply the rule mentioned hereinabove in practice by starting the process of delimitation of the district from its northern end. Then it has to proceed clockwise to achieve and meet the ideal quota per seat to make one single constituency in the district and go on further in a clockwise direction to delimit the remaining number of seats in the district. This may be done in a zigzag manner but that manner also needs to proceed in a clockwise direction. This means that the framers of the Rules, 2017 have given importance to the procedure of delimiting a district in a clockwise direction. The step of going zigzag is secondary to and is dependant upon the clockwise direction. This means that the zigzag

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manner shall take place, only in a clockwise direction in order to keep the population of the constituencies in the district equal and as close as may be practicable to the ideal quota per seat. That by starting from Taluka Khairpur, that is not the northern end of the district, the delimitation committee has acted against the rule mentioned hereinabove and has made the entire delimitation exercise colourable and the same is liable to be set aside.

E. It is also a statutory duty of the Election Commission of Pakistan that while delimiting the boundaries of a constituency should keep in mind certain important factors as the boundaries according to law must be drawn in such a manner that the constituents should have an opportunity to elect candidates they feel truly represent them. This usually means that constituency boundaries should coincide with communities of interest as much as possible. Communities of interest can be defined in a variety of ways. For example, they can be geographically defined communities through physical features such as mountains or islands, or they can be 'communities' that share a common race, ethnic or tribal background, or the same religion or language. If constituencies are not composed of communities of interest, however defined, it may be difficult for representatives to serve the constituency well.

F. It may be appreciated that the Election Commission of Pakistan is under a constitutional obligation to maintain the 'Equality of voting strength.' According to Article 25 of the

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Constitution, 1973 and the electoral laws of Pakistan, the Election Commission of Pakistan has to delimit the boundaries of a constituency so that other constituencies are relatively equal in population. Equally populous constituencies allow voters to have an equal weighted vote in the election of representatives. If for example, a representative is elected from a constituency that has twice as many voters as another constituency, voters in the larger constituency will have half the influence of the voters in the smaller constituency. If the Election Commission of Pakistan delimits constituencies that vary greatly in population then the same will fall under the definition of a condition referred to as malapportionment, and this will be in violation of a central tenet of democracy, namely, that all voters should be able to cast a vote of equal weight.

- G. That it is urged that additional grounds may also be added at the time of hearing of this petition.

PROPOSAL

- (i) That it should be noted that without prejudice to the argument that the delimitation committee has erred in law by delimiting the constituencies based on the notification dated 06.02.2017, the following proposal is made upon the new notification of tapedari circles of district Khairpur.
- (ii) That while applying the aforementioned rules and principles for the purposes of delimitation in District Khairpur, one can see that the Northern end of District Khairpur is the

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administrative unit of Taluka Kingiri. Therefore, according to law, the delimitation of the District Khairpur shall start from the administrative unit of Taluka Kingiri and shall proceed in a clockwise direction and then shall end at Taluka Gambat as it is the last administrative unit bordering Taluka Kingiri when proceeding in a clockwise manner.

- (iii) That the population of Taluka Kingiri i.e. 340,218 is sufficient to meet the ideal quota per seat for the provincial assembly and for the convenience of this proposal this constituency shall be called, **KHAIRPUR PS-26-I KINGIRI**.

KHAIRPUR PS-26-I KINGIRI

1. Taluka Kingiri	340,218
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- (iv) That after delimiting the first provincial assembly constituency of District Khairpur the Delimitation Committee, by strictly following the Rules, 2017 shall proceed from to Northern End of the district in a clockwise manner to the North-North-Eastern administrative unit to delimit the second constituency as per the quota per seat. Taluka Khairpur is the second administrative unit that is supposed to be delimited whilst following the Rules, 2017. According to the provisional census results, 2017 the population of Taluka Khairpur is 440,752. This population is far more than the required number of the quota per seat. Thus some tapedari circles have to be carved out from Taluka Khairpur in order to meet the ideal quota that is within the population range mentioned at paragraph No. 10 of this proposal, so that the principle of equal distribution

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within the district is maintained. For the convenience of this proposal this constituency shall be called **KHAIRPUR PS-27-**

II KHP.

KHAIRPUR PS-27-II KHP

1.	Tapedari Circle Shah Ladhani	15,131
2.	Tapedari Circle Babarloi	1,436
3.	Town Committee Babarloi	13,636
4.	Tapedari Circle Ubhri	13,470
5.	Tapedari Circle Pir Mangio	17,226
6.	Town Committee Thehri I	23,274
7.	Town Committee Thehri II	12,055
8.	Tapedari Circle Thehri	349
9.	Tapedari Circle Rainah	9,655
10.	Tapedari Circle Luqman	9,559
11.	Municipal Committee Khairpur	183,181
12.	Tapedari Circle Nizamani	16,763
13.	Tapedari Circle Bhurgari	11,920
14.	Tapedari Circle Shadi Shaheed	11,963
	Total	339,618

- (v) That the after delimiting the second provincial assembly constituency, the Delimitation Committee shall proceed to delimit the third constituency of District Khairpur. The Delimitation Committee by following the Rules, 2017 shall have to start the delimitation of this third constituency by firstly taking the tapedari circles that have been carved out from Taluka Khairpur and then move in a clockwise direction in a North-East way and merge them with the administrative unit that borders them in a clockwise direction. The administrative unit that borders Taluka Khairpur in a clockwise direction is Taluka Kotdiji. According to the provisional census result, 2017 the population of Taluka Kotdiji is 348,899. So when the

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population of the tapedari circles that are carved out from Taluka Khairpur is added to the population of Taluka Kotdiji then the population of the third constituency will become far more than what is required as per the quota per seat. Therefore some tapedari circles shall be needed to be carved out in order to meet the ideal range of the quota per seat, as mentioned at paragraph No. 10 of this proposal. That the Delimitation Committee by following the Rules, 2017 shall proceed to delimit the third constituency of District Khairpur by going in a clockwise direction by taking the tapedari circles of Taluka Khairpur and tapedari circles of Taluka Kotdiji. That while moving in the clockwise zigzag direction, the Delimitation Committee shall move to the administrative unit that falls on the East. The administrative unit that is on the East in a clockwise direction to Taluka Kotdiji is Taluka Nara and it has a population of 160,985. That the Delimitation Committee, whilst delimiting the constituencies, has to keep in mind that facilities of communication and public convenience are the principles of delimitation and the major facility of communication that connects Taluka Nara with Taluka Kotdiji is the Kotdiji to Nara National Highway Road and the same connection would also be convenient for the public. The Delimitation Committee in order to make the quota per seat to fall well within the ideal range as mentioned at paragraph No. 10 of this proposal shall take the population from Taluka Nara by carving out census circles (in an urban area) and tapedari circles that are close to the Kotdiji to Nara National Highway road. For the

convenience of this proposal this constituency is be known
as **KHAIRPUR PS-28-III KHP-KOTDIJI-NARA**

KHAIRPUR PS-28-III KHP-KOTDIJI-NARA

Khairpur Taluka

1.	Machyoon Tapedari Circle	13,708
2.	Hajna Shah Tapedari Circle	15,822
3.	Mehar Ali Tapedari Circle	12,454
4.	Khanpur Tapedari Circle	12,361
5.	Koro Phulpoto Tapedari Circle	7,659
6.	Tando Nazar Ali Tapedari Circle	5,569
7.	Mangi Tapedari Circle	10,909
8.	Tando Masti Tapedari Circle	13,063
9.	Wassan Tapedari Circle	9,715
	Total	101,260

Kotdiji Taluka

10.	Kanasira Tapedari Circle	15,121
11.	Layari Tapedari Circle	13,547
12.	Goodiaro Tapedari Circle	19,523
13.	Sonu Gopang Tapedari Circle	24,408
14.	Mithri Tapedari Circle	23,637
15.	Kotlo Tapedari Circle	8,173
16.	Fatehpur Tapedari Circle	20,017
17.	Arab Machi Tapedari Circle	6,186
18.	Nawab Wassan Tapedari Circle	11,030
19.	Town Committee Kotdiji	37,538
20.	Sohu Tapedari Circle	7,956
	Total	187,136

Nara Taluka

21.	Town Committee Chowndko	38,641
22.	Sikandabaad Tapedari Circle	15,438
	Total	54,079
	Grand Total	342,475

(vi) That the Delimitation Committee, whilst following the Rules, 2017 shall now have to proceed to delimit the boundaries of

the fourth constituency of District Khairpur. The Delimitation Committee will take the carved out tapedari circles of Taluka Kotdiji and proceed in a clockwise zigzag manner and merge those tapedari circles with the administrative unit that borders them in a clockwise zigzag manner. The administrative unit that borders the tapedari circles which are carved out for Taluka Kotdiji is Taluka Mirwah. Mirwah has a population of 352,491 according to the provisional census result, 2017. So when the population of the Tapedari Circles that are carved out from Taluka Kotdiji is added to Taluka Mirwah then the population of the fourth constituency will exceed the ideal range of the quota per seat. Thus some tapedari circles will be needed to be carved out from Taluka Mirwah and then adjusted in a clockwise zigzag manner with the other constituencies of District Khairpur. The Delimitation Committee has to delimit the constituencies in a clockwise zigzag manner and has to keep in mind the facilities of communication and public convenience as being the principles of delimitation. Taluka Mirwah is connected to Taluka Nara through the Thari to Nara Road. Therefore, by going in a clockwise zigzag manner few tapedari circles of Taluka Nara that are close to the Thari to Nara Road, can be taken by the Delimitation Committee in order to achieve the ideal quota per seat. For the convenience of this proposal this constituency is to be known as **KHAIRPUR PS-29-1V KOTDIJI-MIRWAH-NARA**

KHAIRPUR PS-29-IV KOTDIJI-MIRWAH-NARA

Kotdiji Taluka

1.	Town Committee Fakeerabad	31,277
2.	Town Committee Kumbh	16,789
3.	Ali Muhammad Machi Tapedari Circle	16,111
4.	Nebahu Patta Tapedari Circle	18,309
5.	Jhando Mashaikh Tapedari Circle	20,938
6.	Talpur Wada Tapedari Circle	19,287
7.	Babar Tapedari Circle	16,084
8.	Naseer Fakir Tapedari Circle	10,090
9.	Jiskani Tapedari Circle	12,878
	Total	161,763

Mirwah Taluka

10.	Town Committee Bozdar Wada	16,713
11.	Tali Tapedari Circle	15,835
12.	Mango Shar Tapedari Circle	11,771
13.	Thari Tapedari Circle	15,373
14.	Jalbani Tapedari Circle	30,357
15.	Town Committee Thari	23,656
16.	Mandan Tapedari Circle	19,465
	Total	133,170

Taluka Nara

17.	Tapedari Circle Ghulam Hussain	11,076
18.	Tapedari Circle Rahim Bux Wassan	18,676
19.	Tapedari Circle Pir Bux Aradin	2,195
20.	Tapedari Circle Jubo	24,643
	Total	56,590
	Grand total	351,523

(vii) That after delimiting the fourth constituency the Delimitation Committee will proceed in a clockwise zigzag manner to delimit the boundaries of the fifth constituency. Now the Delimitation Committee will take the rest of the tapedari circles of Taluka Nara and move in a clockwise direction and merge them with the entire administrative unit of Taluka

Faiz Gunj. After moving in a clockwise direction from Taluka Faiz Gunj few tapadari circles from Taluka Mirwah shall be taken to meet the ideal quota per seat. As mentioned in the preceding paragraph, Taluka Mirwah is connected to Taluka Nara via the Thari to Nara Road. In summary this is in accordance with the Rules, 2017 as the Delimitation Committee is moving in a clockwise manner from Taluka Nara to the southern end of Taluka Faiz Gunj and then moving from Taluka Faiz Gunj in a clockwise direction and taking the tapadari circles of Taluka Mirwah that border Taluka Faiz Gunj. For the convenience of this proposal this constituency is to be known as **KHAIRPUR PS-30-V NARA-FAIZ GUNJ-MIRWAH**

KHAIRPUR PS-30-V NARA-FAIZ GANJ-MIRWAH

Taluka Nara

1.	Pir Abdul Qadir Shah Tapedari Circle	24,598
2.	Pir Bux Gaho Tapedari Circle	8,666
3.	Khewari Tapedari Circle	17,003
	Total	50,267

Taluka Faiz Gunj

4.	The entire Taluka Faiz Gunj	224,004
	Total	224,004

Taluka Mirwah

5.	Sawiri Tapedari Circle	6,579
6.	Sutyaro Tapedari Circle	9,884
7.	Jalalani Tapedari Circle	14,074
8.	Telahoo Tapedari Circle	13,304
9.	Allah wasayo Depar Tapedari Circle	6,885
10.	Kharirah Tapedari Circle	13,224
11.	Seri Tapedari Circle	14,601
	Total	78,551
	Grand Total	352,822

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- (viii) That the Delimitation Committee by delimiting the aforementioned five constituencies of District Khairpur in accordance with law, has in a clockwise zigzag manner started from the Northern end of Taluka Kingiri and has reached and delimited the Southern ends of Talukas Nara and Faiz Ganj and reached on Taluka Mirwah. Now the Delimitation Committee in accordance with law has to move in a clockwise zigzag manner and delimit the remaining areas of the District Khairpur according to the Rules, 2017.
- (ix) That after delimiting the fifth constituency of District Khairpur, the Delimitation Committee shall proceed to delimit the boundaries of the sixth constituency. The Delimitation Committee shall start from the remaining tapedari circles of Taluka Mirwah and proceed in a clockwise zigzag manner and merge them with the administrative unit bordering them, thus, merging them with the tapedari circles and census circles of Taluka Sobhodero. The Delimitation Committee whilst moving in a clockwise zigzag direction will move from the south to the west of the District Khairpur and will then connect the tapedari circles and census circles of Taluka Mirwah with some of the tapedari circles of the administrative unit that falls on the west. The administrative unit that falls on the west of the remaining tapedari circles and census circles of Taluka Mirwah is Taluka Sobho Dero and the Delimitation Committee shall have to proceed in a clockwise zigzag manner and take some tapedari circles and census circles from Taluka Sobhodero in order to meet the ideal quota per seat for the sixth constituency of the District

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Khairpur. For the convenience of this proposal this constituency is to be known as **KHAIRPUR PS-31-VI**

MIRWAH-SOBHO DERO

KHAIRPUR PS-31-VI FAIZ GANJ-MIRWAH-SOBHO DERO

Taluka Mirwah

1.	Town Committee Tando Mir Ali	23,649
2.	Tando Mir Ali Tapedari Circle	4,898
3.	Dato Dasti Tapedari Circle	15,301
4.	Pir A. Q. Shah Tapedari Circle	12,661
5.	Sher Khan Lund Tapedari Circle	16,640
6.	Waryam Wandier Tapedari Circle	16,919
7.	Deparja Tapedari Circle	11,288
8.	Chutto Wandier Tapedari Circle	9,558
9.	Town Committee Setharja	29,856
	Total	140,770

Taluka Sobhodero

10.	Tapedari Tunia Tapedari Circle	6,544
11.	Rasoolabad Tapedari Circle	15,097
12.	Pir Mashaikh Tapedari Circle	14,550
13.	Town Committee Hingorja	29,022
14.	Gadeji Tapedari Circle	18,749
15.	Town Committee Ranipur	33,587
16.	Thatti Tapedari Circle	20,079
17.	Sami Tapedari Circle	18,670
18.	Pir Taj Muhammad Circle Tapedari Circle	7,992
19.	Ranipur Tapedari Circle	3,003
20.	Town Committee Sobhodero	31,342
	Total	198,635
	Grand Total	339,405

- (x) That after delimiting the sixth constituency of District Khairpur, the Delimitation Committee shall proceed to delimit the boundaries of the seventh constituency. It will move in a clockwise direction and take the tapedari circles and census circles that are carved out from Taluka Sobho

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Dero and merge them with the administrative unit bordering them. The administrative unit bordering the carved out tapedari circles and census circles of Taluka Sobho Dero is Taluka Gambat. Gambat has a population of 263,746 and when the population of the carved of tapedari circles and census circles is added to it then it shall meet the ideal quota per seat. For the convenience of this proposal this constituency is to be known as **KHAIRPUR PS-32-VII SOBHO DERO-GAMBAT**

KHAIRPUR PS-32-VII SOBHO DERO-GAMBAT

Taluka Sobho Dero

1.	Tapedari Circle Sobho Dero	10,328
2.	Tapedari Circle Ketu Mooso Bughio	18,903
3.	Tapedari Circle Noorpur	11,300
4.	Tapedari Circle Newaro	4,888
5.	Tapedari Circle Gahino Bhagat	16,271
6.	Tapedari Circle Madd	14,103
	Total	75,793

Taluka Gambat

7.	Entire Gambat Taluka	263,746
	Grand Total	339,539

Copy of the Coloured Map defining the boundaries of the delimited seats as per this proposal filed herewith and marked as Annexure "O-6".

PRAYER

It is therefore, prayed in the interest justice, equity and good conscience that the Election Commission of Pakistan may graciously be pleased to:

- (i) Set aside the preliminary list of provincial assembly constituencies and accept the above proposal and delimit the seven provincial assembly constituencies of District Khairpur according to this representation.

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- (ii) In the alternative, set aside the preliminary list of constituencies and direct the delimitation committee to conduct the entire delimitation exercise afresh according to the tapedari circles in the last provisional census results, and then issue a preliminary list again by applying the principles of delimitation laid down in Section 20 of the Act, 2017 in letter and spirit.

DATED:- .03.2018

(ZOHAI B ALI TUNIO)
son of Shah Muhammad Tunio,
Resident of Tapedari Circle
Noorpur Riasat, Taluka Sobhodero,
District Khairpur,

ADVOCATE FOR OBJECTOR