

**BEFORE THE SECRETARY ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD.**

Ghulam Muhammad son of Dost Muhammad Zargar, resident of Mohallah Gharibabad, Deh Rajo Dahari Post office Lakha Road Tehsil Mehrabpur District Naushahro Feroz.

....**PETITIONER**

VERSUS

The Delimitation Committee, Sindh

.....**RESPONDENT**

**REPRESENTATION/OBJECTIONS UNDER SECTION 21
OF THE ELECTION ACT, 2017.**

Respectfully Sheweth:

1. That the petitioner belongs to District Naushahro Feroze having Vote at serial No. 172, Census Block Code 345020504, Electoral Area Deh Rajo Dahri Tehsil Mehrabpur District Naushahro Feroze. The respondent has made preliminary list of delimitation of constituencies for District Naushahro Feroze as P.S 33 Naushahro Feroze-I, PS-34 Naushahro Feroze-II, PS-35 Naushahro Feroze-III, PS-36 Naushahro Feroze-IV, Provincial Assembly of Sindh.
2. That the delimitation committee Sindh has made following preliminary list of delimitation of constituencies for District Naushahro Feroze Provincial Assembly of Sindh.

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	i. Tapadar Circle Madd Aleem ii. Tapadar Circle Tharu Shah iii. Tapadar Circle Molhan iv. Tapadar Circle Dalipota of Bhiria STC and v. Tapadar Circle Ghergaju of Bhiria Road STC of District Naushahro Feroze TOTAL	27659 10769 11541 14448 17337 429980
PS-36 Naushahro Feroze IV	a. Moro Taluka and b. The following tapadar Circle of Darya Khan Mari STC i. Vissor ii. Sahib Khan iii. Massurjiwai Of District Naushahro Feroze TOTAL	368789 12920 4877 6798 393384

3. That being aggrieved and dissatisfied with the above said preliminary list of delimitation of constituencies dated 05.03.2018, the petitioner preferred representation, legal objections, inter-alia, on the following grounds: -

GROUND

- a. That the petitioner is registered voter of Deh Rajo Dahri Tehsil Mehrabpur District Naushahro Feroze as such entitled to make representation to raise objections for alteration and modification in preliminary proposals of delimitation of Provincial constituencies.

b. That the petitioner has been contested the local council elections of Union Council Lakha Road Taluka Mehrabpur District Naushahro Feroze and succeeded to elected as Vice Chairman of Union Council Lakha Road Taluka Mehrabpur District Naushahro Feroze, Sindh.

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c. That preliminary proposal of delimitation for provincial assembly seats in District Naushahro Feroze has been issued while violating the geographic compact areas, physical features, existing boundaries of administrative units, facilities of communication, public convenience and other cognate factors to ensure homogeneity in the creation of constituencies in District Naushahro Feroze as enumerated in Section 20 of the Elections Act 2017 and Rules 7,8,9 and 10 of the Elections Rules 2017.

d. That the delimitation committee has proposed the constituencies for Provincial Assembly of Sindh in District Naushahro Feroze keeping aside the guidelines given in the Act and rules.

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e. That in the preliminary list of constituencies there has been gross violation of sub section 1 of section 20 of the Election Act 2017 by not considering the existing boundaries of administrative unit in tact, which requires to keep the existing boundaries of administration unit in tact as far as practicable. The boundaries of administrative units have not been divided conveniently without applying the principles as laid down in the Act 2017 and Rules. While creating preliminary list of delimitation of constituencies, the delimitation committee had disturbed the existing constituencies and ignored the public interest to approach the central part of their respective cities, health units/hospitals, Courts, communications and interaction with themselves and others and also to approach their representative resulting in great inconvenience and hardship to the public at large.

f. That if the preliminary list of constituencies of the above said District are not set-aside, modified and amended the public at locality as well as at large would suffer an irreparable loss.

g. That according to preliminary list of provincial constituencies the actual facts at grounds are not considered the District has been divided in a zig-zag manners instead of clock-wise pattern. Without centralizing each constituency, far-flung areas have been included, instead of adjacent areas. Moreover, disturbance has been created to approach the National Highway and other communications to the local people as the people would have to travel through different Talukas to enter into different parts of same constituency. The inclusion of entire Taluka Mehrabpur and some parts of Taluka Kandiaro in the same constituency would be suitable on account of business, social communication, to access main part of Taluka Mehrabpur and to get common facilities. In addition the approach of students to school and colleges of same constituencies would also be disturbed.

h. That exclusion of Taluka Bhiria is liable to be excluded from Taluka Mehrabpur because it has no attachment with the communications of Taluka Mehrabpur. It has better communication, administration, geographic attachment with

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Naushahro Feroze and Moro instead of with Mehrabpur.

- i. That the petitioner is submitting proposals after serving the ground realities and taken into consideration all the relevant factors as envisaged under Section 20 of the Election Act, 2017 and rules.
- j. That the marked map of the provincial constituencies of District Naushahro Feroze are attached.
- k. That other grounds would be addressed with the permission of this Honourable Commission at the time of arguments.

PROPOSALS

PS-33 NAUSHAHRO FEROZE-I

- a) The following area of Gul Shah STC Kandiaro Taluka
 - i. Tapedar Circle Shaikhani 18279
 - ii. Tapedar Circle Khanwahan 22962
 - iii. Tapedar Circle Gul Shah 14410
- b) Mehrabpur Taluka (entire)
- c) The following area of Kandiaro Taluka
 - i. Tapedar Circle Kandiaro 14313
 - ii. Tapedar Circle Ghanghra 15227
 - iii. Tapedar Circle Mirzanpur 6612
 - iv. Tapedar Circle Chachak 6487
 - v. Tapedar Circle Sethar 15275
 - vi. Kandiaro Town Committee 39379
- d)

TOTAL	400224
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PS-34 NAUSHAHRO FEROZE-II

- a) The following area of Bhiria Taluka
- i. Bhiria Road STC 77180
 - ii. Tapedar Circle Bhiria 17827
 - iii. Tapedar Circle Dali 122500
 - iv. Tapedar Circle Jalbani 13967
 - v. Tapedar Circle Kanjar 8926
 - vi. Tapedar Circle Khaki Qasim 23483
 - vii. Tapedar Circle Machur of Bhiria STC 20381
- b) The following area of N Feroze Taluka
- i. Paddidan STC 71638
 - ii. Town Committee Paddidan 25355
 - iii. Tapedar Circle Naushahro Feroze 27665
 - iv. Tapedar Circle Koor Hassan 18856
Of Naushahro Feroze STC
 - v. Town Committee Naushahro Feroze 38181
- TOTAL 395050**

PS-35 NAUSHAHRO FEROZE-III

- a) STC Darya Khan Mari and 53668
Town Committee D.K Mari
Of Naushahro Feroze Taluka
- b) Tapedar Circle Lalia of Sehra STC 280479
And Moro Taluka
- c) The following area of Naushahro Feroze Taluka
- i. Tapedar Circle Phull 19172
Of Paddidan STC excluding
TC Phull
 - ii. Tapedar Circle Waggan 15012
 - iii. Tapedar Circle Noor pur 10573
Of Naushahro Feroze STC
- TOTAL 390831**

PS-36 NAUSHAHRO FEROZE-IV

- a) STC Sehra excluding Tapedar 88310
Circle Lalia of Moro Taluka
- b) The following area of Naushahro Feroze Taluka
- i. Tapedar Circle Mithiani 20831
 - ii. Tapedar Circle Abiji 7579
 - iii. Tapedar Circle Kanjar 21978
Of N Feroze STC
 - iv. Town Committee Mithiani 30386
- c) The following area of Bhiria Taluka
- i. Tapedar Circle Tharu Shah 10769
 - ii. Tapedar Circle Dalipota 1448

- iii. Tapedar Circle Mad Alim 27659
 - iv. Tapedar Circle Molhan of Bhiria STC11541
 - d) STC Debrho and 23272
 - i. Tapedar Circle Ghulam Shah 78900
 - ii. Tapedar Circle Salehpur 18959
 - iii. Tapedar Circle Shameer Dero 17125
Of Kandiaro STC of Kandiaro Taluka
 - e) STC Gul Shah excluding the following 26703
Tapedar Circle
 - i. Shaikhani
 - ii. Gul Shah
 - iii. Khanwahan
- TOTAL 426268**

PRAYER

In the light of above said submissions it is most respectfully prayed that the preliminary delimitation list of the provincial constituencies for District Naushahro Feroze of Sindh Province be set-aside and may kindly be modified, altered according to proposals of the petitioner.

Any other relief which this Commission deems fit and proper may also be awarded in the interest of justice.



PETITIONER

Ghulam Muhammad

son of Dost Muhammad Zargar,
resident of Mohallah Gharibabad,
Deh Rajo Dahari Post office Lakha Road
Tehsil Mehrabpur District Naushahro Feroz
Cell No. 0301-3214784

Through



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Dated: 31.03.2018