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MA
3/9/18

To

The Honourable Secretary,
Election Commission of Pakistan,
Islamabad.

Subject:- **COMPLAINT / OBJECTION AGAINST THE NOTIFICATION NO.F-8(1) 2018 IN RESPECT OF DELIMITATION OF UMERKOT DISTRICT.**

Respected sir,

Being aggrieved with the above notification to extent of *delimitation* of PS(s) of Umerkot District, Umerkot, I respectfully submit the following objection (s) / submissions as well proposals to bring the *delimitation* of said PS(s) in line and spirit of Section 20 of Chapter-3 of Delimitation of Constituencies:-

FACTS / BACK-GROUND

- 1) Sir, till recent delimitation, the Umerkot District was continuing on delimitation of year 2002 which was based on population of year 1998. As per census of year 1998 the total population of Umerkot District was '663,125' and ratio for a seat of PS was '210,000' therefore, there Umerkot District was given three PS(s) i.e PS 68, PS-69 & PS-70.
- 2) Sir, for ensuing general election, the ratio of per seat of PS has been fixed as '368,410 with relaxation of 10 percent more or less. Sir, since as per recent census the total population of Umerkot District is '1073146' which again is for three PS(s). As per delimitation of year 2002 the Shadipalli Town & STC Shadipalli (having population of 26386) were included in PS-67 only to satisfy requirement of *ratio*.
- 3) Sir, inclusion of Shadi Palli Town and Shadipalli STC in PS-51 (Old 69) the total population of this PS comes to '362604' which is as per recently fixed *ratio*.

4) Sir, PS-52 (Old 70), as per recent census, has population of 411335 which is more than fixed ratio while PS-53 (Old PS-68) has population of 299207 which is less than required ratio. If nearest **Tapas** of Umerkot namely T.C Qazi Muhammad Dars, T.C Jahaneero, T.C Marwa, T.C Kunnar, T.C Diggo, T.C Kaith T.C Sonpur are included while STC **Tabohi** of Samaro, if excluded from, PS-53 (Old PS-68) as per their geographical position / location, it shall satisfy the required *ratio* and shall cause no harm or prejudice to any body because **Tabohi** was earlier included only to satisfy number else its geographical position / location does not suit. The position shall become evident and clear from old **map**, showing delimitation of year 2002 map attach here with Annexure (A) page No.

5) Sir, in recent delimitation process, the following aspects i.e:-

- a) the *prime* object is to chalk-out / form a constituency is to facilitate the people of the area (*constituency*) not only for voting purpose but also for future aspects not limiting but including development schemes so as to benefit maximum people;
- b) the easy access and connection between Tapedar Circular) without which concept of *constituency* fails;

have been ignored. In PS-53 the nearest **Tapas** of Samaro i.e STC Padrio & TC Jhiluri have been excluded from PS-53 and included in PS-51; while for T.C AD Kaplore T.C Walidad and T.C Karna have been included which *prima facie* is quite unnatural and even against said principles. Sir, this has made the length of PS-53 about 90 K.Ms while the Headquarter of PS-53 remains within three K.Ms of border i.e North-west of Kunri. The position becomes quite clear from a bare look of map and makes it clear that this has been manoeuvred i.e:-

- i) The map of election commission, the T.C Qazi Muhammad Dars and T.C AD Kaplore are shown as *two separate Tapa and* Notification No.08/7/2012/REV-1(iv)/89. dated 23.5.2014 Revenue department also verify the same but in notification of Election Commission the **Dehs** of T.C Qazi Muhammad Dars namely Senhoni Thar, Tar-Samoon, Nabisar-Thar, Rajar-Thar & Rajari Thar are shown part of T.C AD Kaplore;



ii) Sir, in map of Election Commission, the Dehs of T.C Additional Kaplore namely Khalrari & Kharoro-thar are shown in PS-52 while in notification the same are shown in PS-53. It is made clear here that both these Dehs cannot be included in PS-53 because in between these Dehs there is Deh Kharoro which is of Tapa Umerkot & MC Umerkot & Deh Mokhal-Bai are of T.C Denore. The same are part of PS-52 and all fall between them.

iii) Sir, the T.C AD Kaplor, created from Tapa Kaplore which is part of PS-52 therefore, T.C AD Kaplore, being part of Tapa Kaplore, should remain in PS-52;

iv) Sir, Taluka Kunri and Taluka Pithoro created in 17th april year 1993 (on creation of Umerkot District) wherein some Tapas were excluded from STC Chhar and formed STC Padrio and it was included in Samaro Taluka only for revenue formalities otherwise same always remained part of STC Chhar. It is *naturally* attached / affiliated with Taluka Kunri and is located within three K.Ms from Kunri. The position becomes evident from a *bare* look at map. This is reason that this is still included within beat of Kunri police station remain these should be part of PS 53 , TC Araoro of STC Padrio Taluka Samaro and TC Tobhan of STC Padhrio and Deh Soonthi of TC Padhrio are within the jurisdiction of civil and judicial magistrate court Taluka Kunri. These *however not suitable* been included in PS-51 thereby breached the objects of criterion;

Court jurisdiction office order copy attach here with Annexure (3)

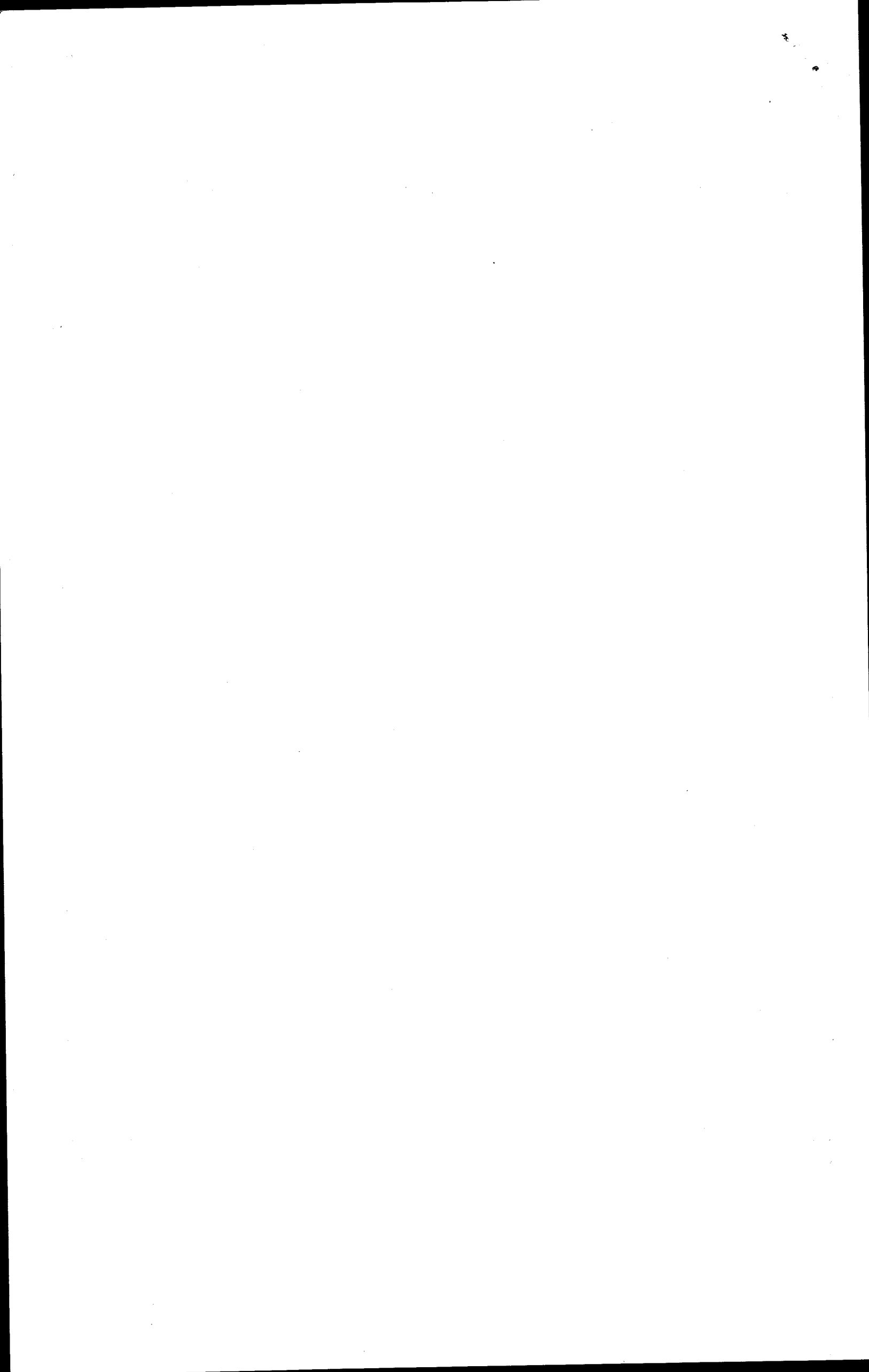
v) The Tapa Jhiluri of Taluka Samaro, due to its geographical location, needs not be excluded from PS-53;

Notification dated 17-04-1993 regarding creation of new district Umerkot is attached here with Annexure (A-2) page No.

GROUND/REASONS

A) Sir, the delimitation process was conducted but such 'delimitation process', the basic criterion has been violated / departed;

B) Sir, since the above *delimitation process* was conducted without verifying the record of *existing* 'Tapas' therefore, such delimitation *prima facie* is



against the spirit and object of Section 20, Chapter-3 of Delimitation of Constituencies.

(The proposed map of election commission of Pakistan for Umerkot District showing three said PS (described in same colours) is submitted herewith) as annexure "B & B-1" page. No.

C) Sir, the above map, proposed delimitation of constituencies, shall *prima facie* establish that

following glaring aspects have entirely been ignored i.e:-

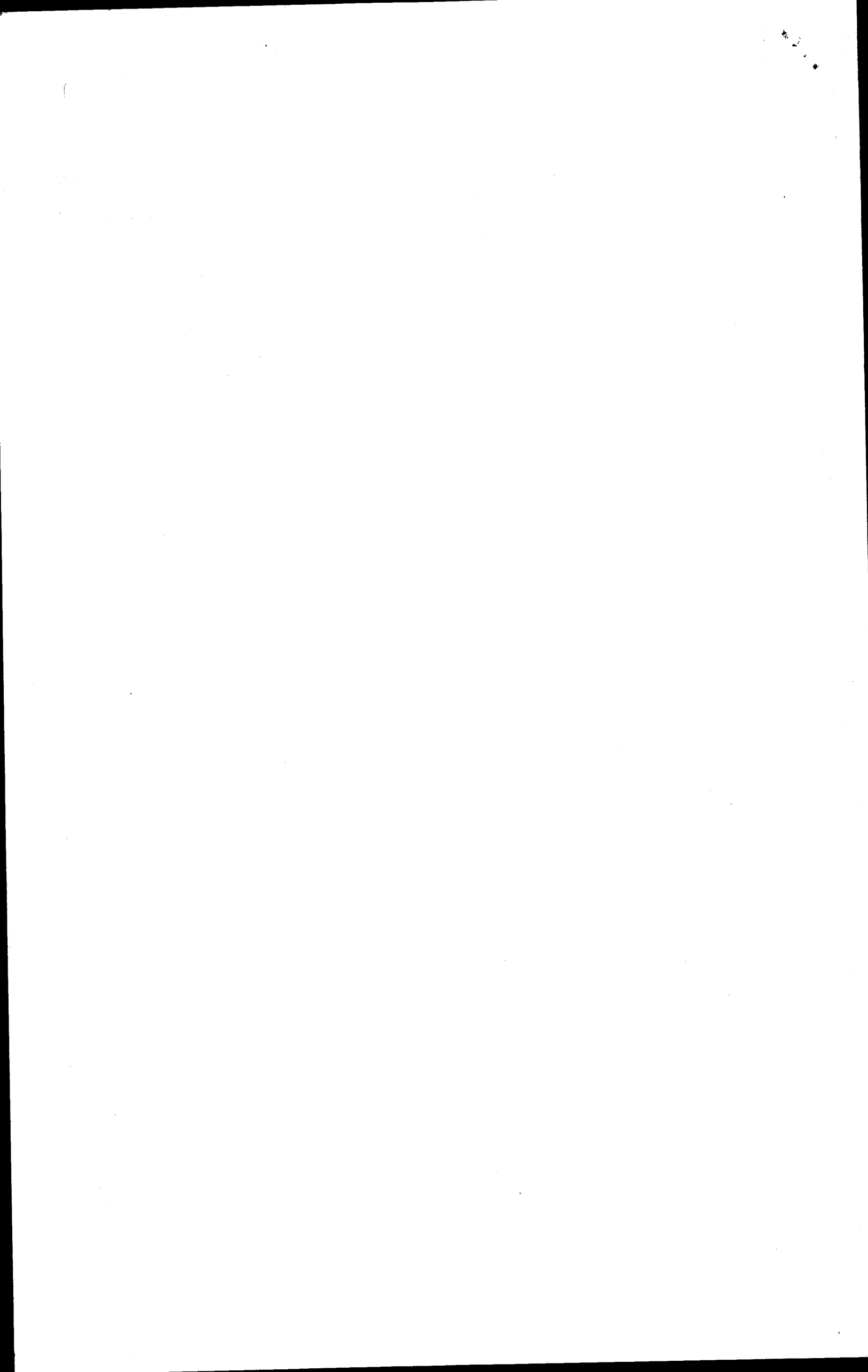
i) Geographical location (s) of Tapa (s);

ii) Convenience, ease, access and feasibilities;

Thus, such *proposed* delimitation (s) of all three said PS (s) was / is not proper, legal, justified and even the object, concept and purpose of *delimitation* have entirely been ignored which *shall* cause serious prejudice and *inconvenience* to voters, contesting candidates and administration. Not only this, but this seems to be with some *particular* reason and object so as to benefit particular political group which *otherwise* is sufficient ground for reconsider such delimitation. Not only this but it shall also make it inconvenience for *winning* candidate to serve maximum people of respective constituency.

PROPOSAL

Since, the objector is interested in having true and fair delimitation within its objective, therefore, respectfully has got prepared the *proposed* delimitation of said *three* (03) which not only stands well on *criterion*, provided by Section 20 of Chapter-3 but also *prima facie* establishes that same also is convenient, easy access for all *purposes* and even does not disturb the *natural* attachment and feasibilities of 'Tapas'.



M. J. Bashir
31/1/18

(colour map, showing proposed delimitations by objector, is submitted herewith).as annexure (C & C-1 and detail of population) page no. and detail of population. Reference map of district Tharparkar is as attached here with Annexure (C-2 & C-3) Page No.

It is further submitted that a bare comparison of map (s), showing delimitation (s), proposed for Election, and the other, proposed by objector, shall make it quite clear that only by :-

1. exclusion of T.C Additional Kaplore from PS-53 (Taluka Umerkot) and inclusion thereof in PS-52;
2. exclusion of T.C Padrio & T.C Jhiluri, Taluka Samaro from PS-51 and inclusion thereof in PS-53;
3. exclusion of T.C Walidad & T.C Karna, Umerkot from PS-53 and inclusion thereof in PS-51;

shall not only satisfy the required criterion but shall not prejudice the required ratio, so set for ensuing General Election.

Copy of notification No. 1(2)2004-PBS dated 03-01-2018 of population Census 2017 attach here with annexure (D)

P R A Y E R

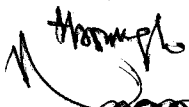
Therefore, it is humbly requested that delimitation of said three constituencies of *Umerkot District, Sindh* may very kindly be reviewed / reconsidered and after appreciating all facts, circumstances and object of *delimitation* as well hearing of objector, the fresh *delimitation* may kindly be ordered preferably as proposed by objector.

Yours sincerely

M. J. Bashir

Muhammad Qasim S/O Muhammad Ismail

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