

To,
Secretary,
Election Commission of Pakistan
Constitution Avenue, G-5, Islamabad.

2nd April, 2018

11/02/04/2018
1-6

Subject: OBJECTION PETITION & PROPOSALS UNDER SECTION 21(3) OF ELECTION ACT, 2017 ON BEHALF OF OBJECTOR/PETITIONER IMTIAZ AHMED SHAIKH ELECTED MEMBER OF PS-11 (SHIKARPUR-I) PROPOSED PS-7 OVER PRILIMINARY LIST OF DELIMITATION OF CONSTITUENCIES OF PROVINCIAL ASSEMBLY, DISTRICT SHIKARPUR, SINDH.

Dear Sir,

1. That the objector/petitioner is voter of proposed PS-7 and Member of Provincial Assembly Sindh from PS-11 proposed PS-07 Shikarpur-I elected in General Election 2013 and then also won by-election held in October 2016.
2. That after the new census conducted in 2016-17, the Hon'ble Election commission of Pakistan empowered under Election Act, 2017 ordered for fresh delimitations of National as well as Provincial Assemblies constituencies in whole of the country.
3. That the Hon'ble Election Commission of Pakistan on 03.03.2018 notified the preliminary/proposed list of delimitation of National as well as Provincial list of constituencies and invited objections over it within one month.
4. That the undersigned is concerned about the delimitation carried in District Shikarpur for Provincial Assembly constituencies. The relevant facts of District Shikarpur for the purposes of the delimitation are as under;

The details of Census 2017 of District Shikarpur

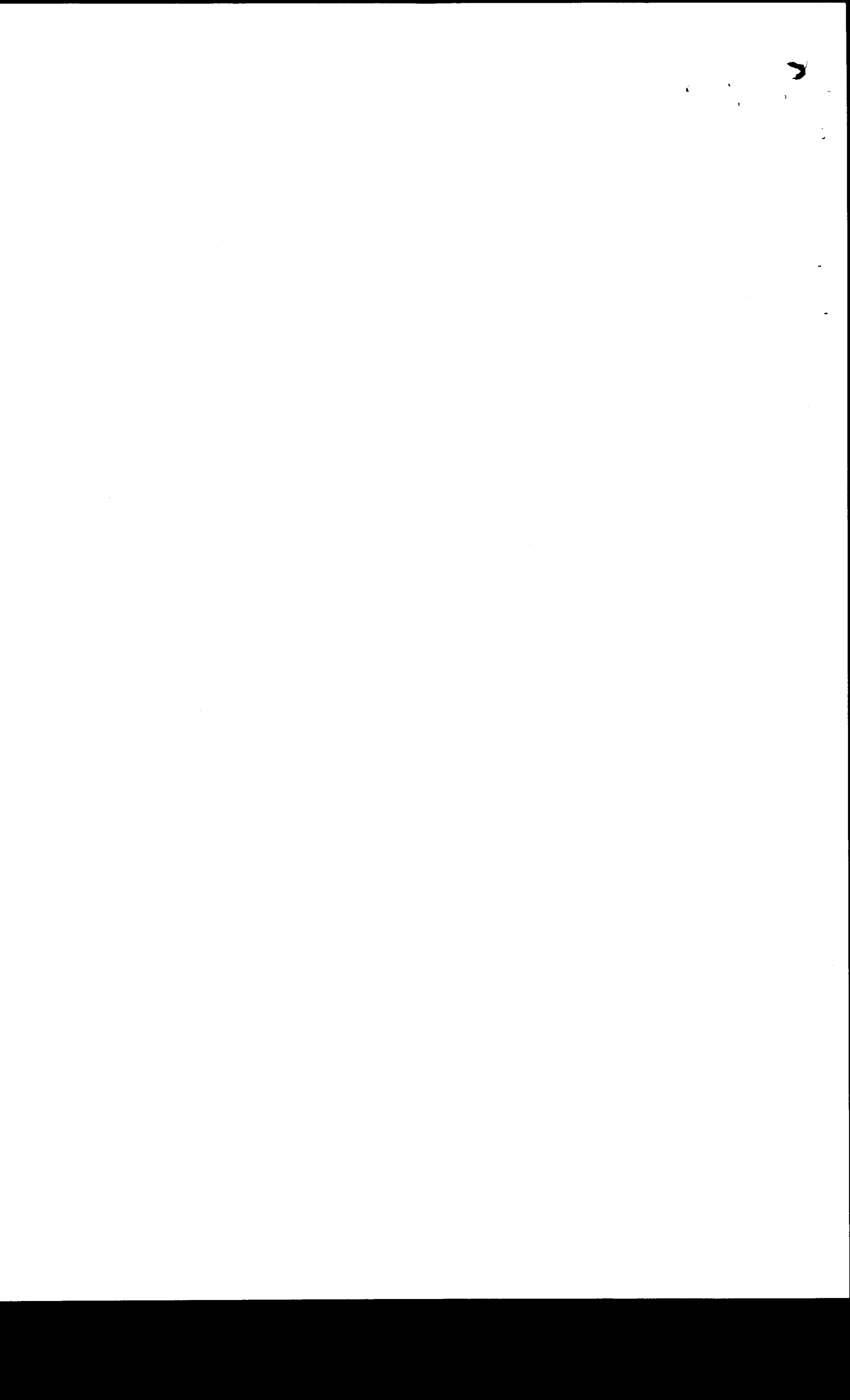
	Rural	Urban	Total
Population	928232	303249	1231481

5. That the district Shikarpur is divided into three provincial assembly constituencies no. as PS-07 Shikarpur-I, PS-08 Shikarpur-II and PS-09 Shikarpur-III as the minimum threshold in the province of Sindh for Provincial assembly constituency is of population 369,000/- approximately.
6. That the Hon'ble Commission issued the preliminary delimitation reports of these three provincial constituencies which are as follows;

2 - 2/02/09/2018

PS-07 Shikarpur-1	a) Taluka Shikar Pur excluding the Jaggan STC.	346,762.
	b) The following areas of Taluka Khanpur	
	(i) Town Committee Khan Pur of STC khanpur	24,899
	(ii) Tapedar Circle Khan Pur	7229
	(iii) Tapedar Circle Shahwah	9401
	(iv) Tapedar Circle Mian Sahib of STC Mian Sahib	17,200
c) Tapedar Circle of udha Garhi yasin STC of Garhi Yasin of District Shikarpur	11,474	
Total		416,965

PS-08 Shikarpur-II	a) Taluka Khanpur Pur excluding the following ares.	217,554.
	(i) Tapedar Circle Mian Sahib	
	(ii) Tapedar Circle Shah wah of circle	
	(iii) Town Committee Khan Pur of STC khanpur.	
	(iv) Tapedar Circle Khan Pur	203,143
b) Lakhi Taluka excluding the following		



9/02/2018

	areas (i) Tapedar Circle Mari and (ii) Tapedar Jhali Kalwari of STC Lakhi District Shikarpur	
	Total	420,697

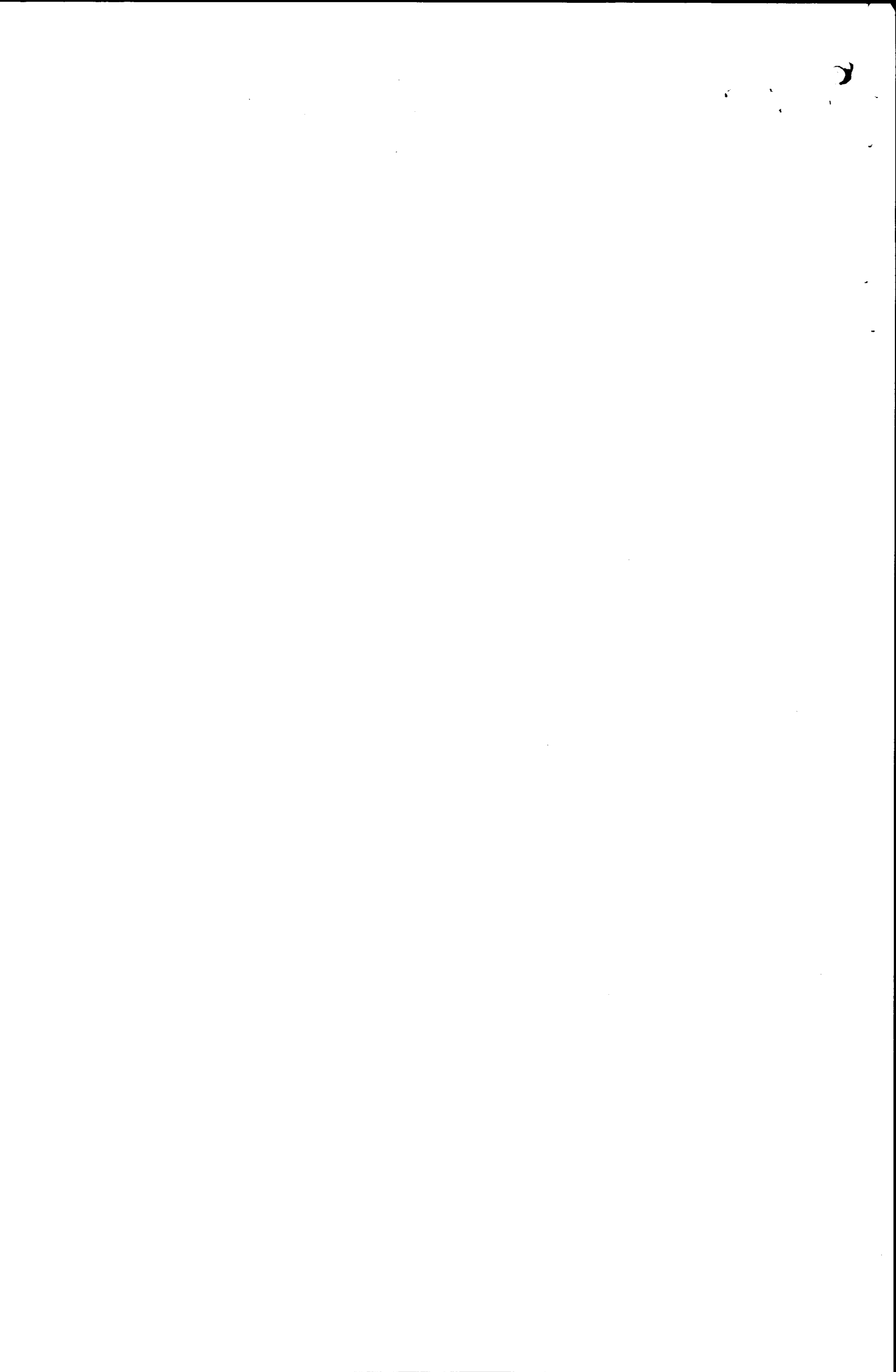
PS-09 Shikarpur-III	a) Taluka Garhi Yasin excluding tapedar circle udha of STC Garhi Yasin.	304,409
	b) Jaggan of STC Shikarpur Taluka and	44,410
	c) The following Tapedar Circle of Lakhi Tapedar STC of Talika Lakhi	
	(i) Mari and (ii) Jhali Kalwari District Shikarpur.	22,913 22,087
	Total	393,819

7. That the said preliminary delimitation were carried but petitioner/objector has objection on the following

GROUND S/ OBJECTIONS

A. That the delimitation of district Shikarpur has not been carried out in accordance with the principle and guide-lines provided in section 20 of the Election Act which is as follows;

20. "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 areas, physical features, existing boundaries of



4.

02/07/2018

administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies."

B. That the petitioner has its grievance of including of only one patwar circles or Tapu i.e the Udha which is administrative part and parcel of Garhi Yasin having its population of 11,474 is made part of proposed PS-07 which should be part of PS-09 including with Taluka/ tehsil Garhi Yasin. The people of the said Tapu, Udha will be deprived from choosing its representative from the area for which they historically, administratively connected hence the inclusion of tapu Udha is illegal and it may be part and parcel of the Taluka Garhi Yasin.

C. That the other ground for proposal of inclusion of Tapu. Udha into PS-09 is that PS-09 has fewer voters in number i. e **393,819** as compared to other two constituencies of the district hence for homogeneous distribution of population which may not be ignored while doing delimitation of the constituencies. Hence by including the Tapu Udha into PS-09 which is otherwise connected to Taluka Grahi Yasin the population of PS-09 will be Approx **405,293**. The said no. of ppopulation will create balance of population in district Shikar Pur.

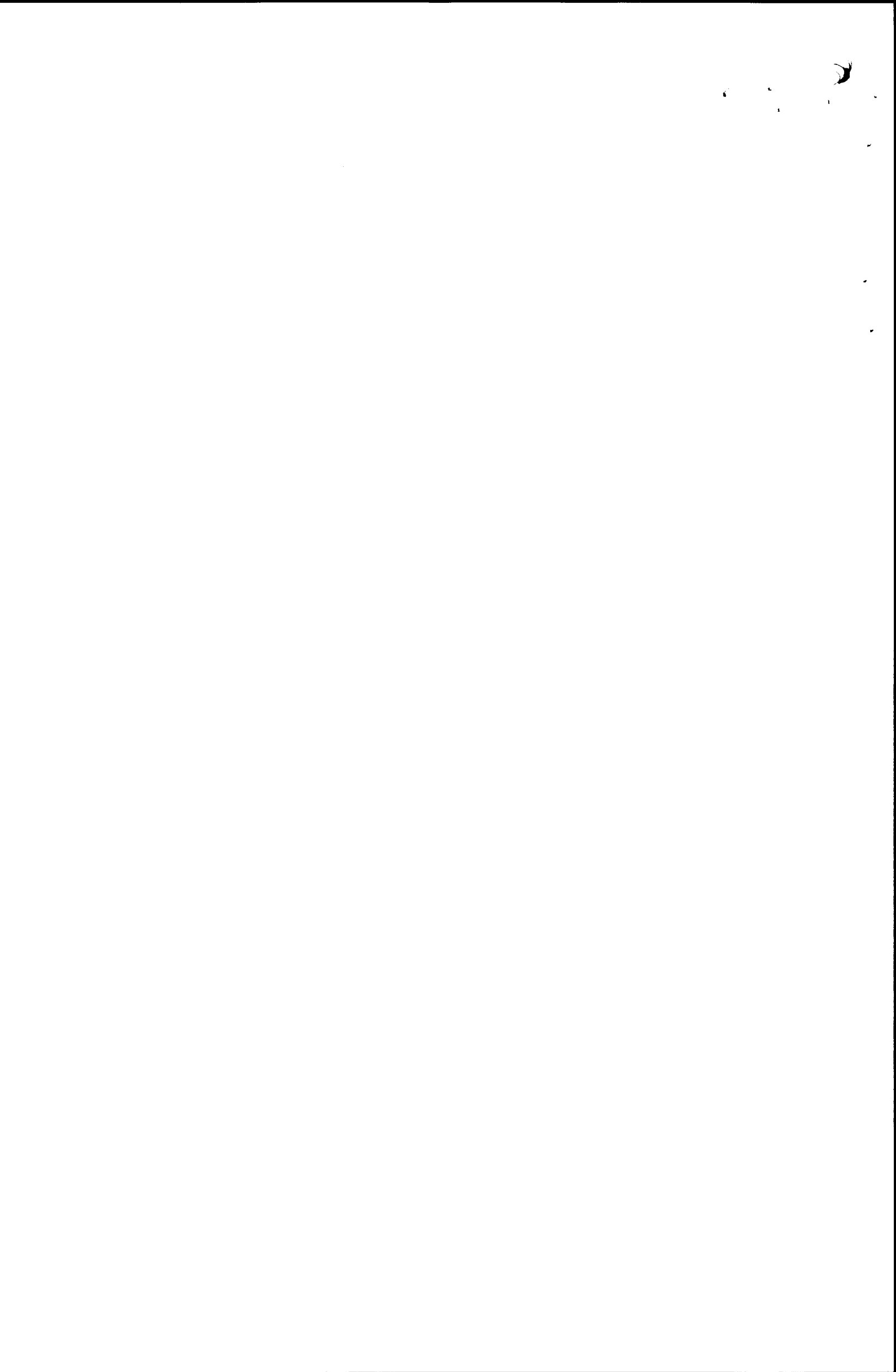
The Proposed Map is also annexed with this Objection Petition.

D. That the Grahi Yasin i.e PS-09 has some key offices of tulaka in the tapu Udha i.e the city Police station and its jurisdiction over the tapu Udha so its disconnection with the PS-09 constituency will deprive the voters of Udha which for all theadministrative purposes are attached with the taluka Garhi Yasin PS-09.

E. That applicants have no objection on the area is PS-8 it may kindly be confirmed as same proposed by the Election Commission of Pakistan.

PROPOSED CONSTITUENCIES OF THE DISTRICT SHIKAR PUR

PS-07 Shikarpur-1	a) Taluka Shikar Pur excluding the Jaggan STC. b) The following areas of Taluka Khanpur	346,762.
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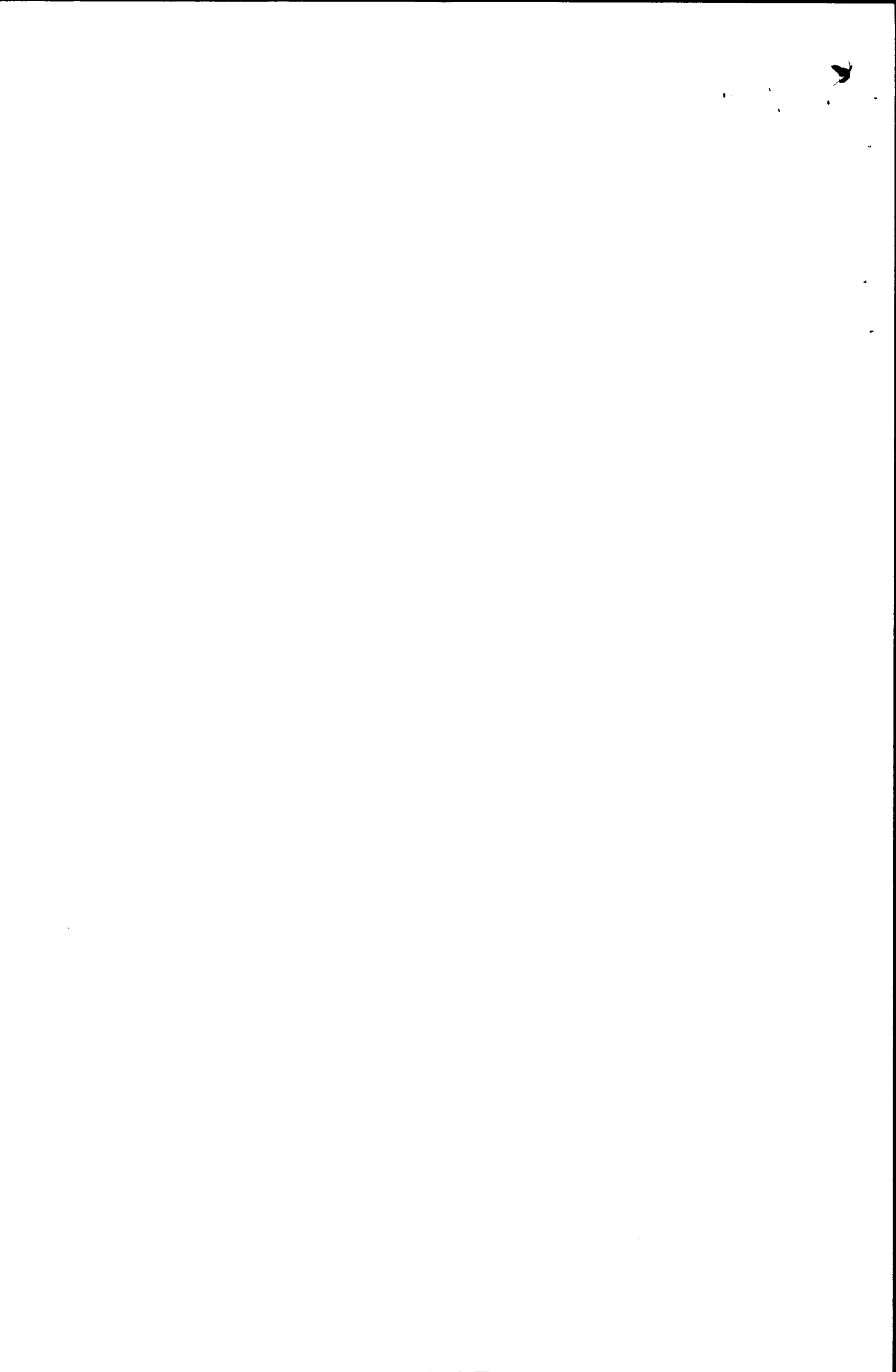


-5-

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	(i) Town Committee Khan Pur of STC khanpur.	24,899
	(ii) Tapedar Circle Khan Pur.	7229
	(iii) Tapedar Circle Shahwah	9401
	(iv) Tapedar Circle Mian Sahib of STC Mian Sahib	17,200
	Total	405,491

PS-08 Shikarpur-II (Same As Proposed)	a) Taluka Khanpur Pur excluding the following areas.	217,554.
	(i) Tapedar Circle Mian Sahib.	
	(ii) Tapedar Circle Shahwah	
	(iii) Town Committee Khan Pur of STC khanpur.	
	(iv) Tapedar Circle Khan Pur	
	b) Lakhi Taluka excluding the following areas	203,143
(i) Tapedar Circle Mari and		
(ii) Tapedar Jhali Kalwari of STC Lakhi District Shikarpur		
	Total	420,697




- 6 -

11/02/07/2011


PS-09 Shikarpur-III	d) Taluka Garhi Yasin including Udha	315,883
	e) Jaggan of STC Shikarpur Taluka and	44,410
	f) The following Tapedar Circle of Lakhi Tapedar STC of Talika Lakhi	
	(iii) Mari and (iv) Jhali Kalwari	22,913
	District Shikarpur.	22,087
	Total	405,293


That the above mention three tables with proposed provincial constituencies of district Shikarpur and the proposed maps are also annexed with the application.

It is therefore most respectfully prayed that the objection application may kindly be accepted and from Ps-07 the Tapu Udah having population of 11474 may be included in PS-09 as it is part and parcel of Grahi Yasin (PS-09) of which proposal given above and annexed maps may also be adopted for final delimitation of the provincial constituencies of District Shikarpur which will be at par with balance of Population and principles enunciated in section 20 of Election Act 2017.


Applicant/ Objector
Imtiaz Ahmad Shaikh
MPA-PS-11 (PPP)

Through


Moazzam Habib
Advocate High Court


Bilal Akbar
Advocate High Court

