

Handwritten signature and date: 29/07/2018

**BEFORE THE DELIMITATION AUTHORITY ELECTION
COMMISSION OF PAKISTAN, ISLAMABAD**

THROUGH SECRETARY

Representation No. of 2018

Sohail Ahmed Shoro s/o Abdul Karim Shoro
R/o 1. House No. B-34, Sindh University Housing Society Phase-1, Jamshoro
2. Post Office Budha Pur, Budha Pur, Taluka Manjhand, Dist. Jamshoro.

----- Applicant

V/S

Delimitation Committee for PS-80, 81 & 82

Respondent

**OBJECTIONS / REPRESENTATION AGAINST PRELIMINARY LIST
ISSUED REGARDING CONSTITUENCIES OF PS-80, 81 & 82**

It is humbly prayed by the above named applicant that the preliminary list of the constituencies has been issued by the Learned Delimitation Committee for PS-80, 81 & 82 but there are certain issues, which were convineintly ignored by the Learned respondent, while issuing the preliminary list of the constituencies, therefore, the applicant prefers the objections / representation and request for the changes accordingly on basis of the following grond realities:-

1. That the applicant is resident of Deh Budha Pur, Tapa Unarpur bearing census code No. 357020303 having serial No. 158, and he is political activist.
2. That the voter certficate of the applicant is issued from the concerned District Election Office, which is attached herewith.

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- 3. That it is very pertinent to mention here that while delimiting the constituencies the committee has committed serious err and had failed to appreciate the guidelines issued by Election Commission of Pakistan as well as ignored the ground realities.
- 4. That while delimiting the constituency of the applicant viz. PS-81, the committee has failed to consider the geography and routes of connectivity / accessibility with the constituency. The areas namely, STC Manjhand, Taluka Manjhand, Tapo Noorpur, Tapo Lakha, Tapo Manjhand, Town Committee Manjhand, were illegally and unlawfully excluded from PS-82 Jamshoro-III (PS-71 Old). Though there is no any justification for excluding the above said areas from PS-82 Jamshoro-III, therefore, the same may be excluded from from PS-80 Jamshoro-I (PS-73 Old) and be included in PS- 82 Jamshoro-III (PS-71 Old).
- 5. That the Tapo Lkahri, STC Unarpur including its five Tapas each one Tapo Khasai, Tapo Unarpur, Tapo Meeting, Tapo Khareji, Tapo Bundveer, were also excluded from PS-82 Jamshoro-III and were included in PS-81 Jamshoro-II, though these areas have no direct nexus with the PS-81 Jamshoro-II in any manner whatsoever but apparently they are shown adjacent on the map however, there is mode of communication between these areas and Thano Bula Khan but for accessing Thano Bula Khan inhabitants of these areas have to travel a distance of more than 175 Kilo Meters. The roads, railways and river ways are connected with PS-82 Jamshoro-III and not to the PS-81 Jamshoro-II. Therefore, these areas required to be joined with their original constituency.
- 6. That besides the above mentioned areas, Tapo Petaro, Tapo Morho Jabal, Tapo Bada and Town Committee Jamshoro are also illegally and unlawfully joined to the PS-81-Jamshoro-II as these areas of have also no direct access to PS-81 Jamshoro-II but these area are adjacent and directly connected with PS-82 Jamshoro-III. Therefore, the preliminary formation of the PS-82 Jamshoro-III is totally against the guidlens and basic principles of delimiting the constituencies.
- 7. That these all areas were already part of PS-82 Jamshoro-III (PS-71 Old) but without any justification these areas have been distrubed to support and favor particular person and all these amendments apparently seem to be on

choice of some blue eyed person and whole demilitation of the District Jamshoro reflects that the said delimitation was based on favortism and nepotism basis. (8)

8. That all three constituencies have been distrubed while issuing the preliminary list and the formation of the preliminary boundaries of the constituencies gives the crystal clear impression that the efforts have been made to support particular candidate and on his choice the diferrent areas are being encircled in particular constituency. Due to such act the applicant and other local inhabitants have suffered the great irreperable loss.
9. That it is very pertinent to mention here that these all areas are not directly connected with the Taluka Thano Bula Khan (PS-81Jamshoro-II) in any manner as the map itself reflects that only the boundaries of mountain range are connected otherwise there is no direct route to connect except to proceed from Kotri and then to travel on Motorway and again to ravel inside the mountains but this illogical formation has been issued in preliminary list, which requires the revision as per ground realities.
10. That the map refelects that the accesibility of these areas by road, by train and by river is directly connected with the Kotri (PS-82) but very surprisingly the said areas were excluded without any reason and justification from PS-82.
11. That the applicant has annexed the concerned map of the locality for ready reference of this August Authority with particular colouring (having green color) to show that there is complete injustice in shifting the abvoe said areas to the PS-80 & PS-81 from PS-82 and the green colored proposed constituency of PS-82 is fulfilling all the guidelines and requirements of law rather this is the only option for delimiting the applicant's constituency.
12. That the applicant has discussed the adjoining constituencies up to the effect that he requires his constituency in particular manner.
13. That delimitation has not been rightly proposed by the Learned Delimitaiton Committee as the Learned Delimitation Committee did not consider the historical significance of these areas, so also failed to appreciate the geographical approaches.

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14. The while issuing the preliminary list of delimitation of the applicant's constituency the Learned Committee has failed to understand the location of bussiness hub for the local inhabitants of the constituency as well as failed to consider the convineince of the local inhabitants of the area and while ignoring so many other important factors, the present preliminary list was issued.

15. That the preliminary delimitation notification is totally against the wisdom of the guidelines as neither the rule of clock-wise formation was considered nor the area was physically kept under monitring it seems that the delimitation was considered only on the basis of the map and adjoining boundaries wihout realising that there is mountain range in between and they have no access to each other in any manner and why the inhabitants of these areas be bent upon to travel more than 175 Kilometers to reach their center of constituency when they are directly connected with the surroundings.

16. That now if the old history is to be considered then it would be clear that in the year 2002 when the dleimitation was carried out, the local political persons challenged the said formation before the Honorable Tribunal of Honorable High Court of Sindh and after considering the genuine demands and ground realities, the Honorable Tribunal had considered the above said all areas as part of PS-82 Jamshoro-III (PS-71 Old) but once again the same injustice is being made with the inhabitants of these areas though there is no geographical or any other change had taken place in the said constituency to justify alteration in the earlier position, which was considered after giving thorough thoughts and hearing the concerned parties including election commission.

17. That the total population of the District Jamshoro is about 993142 therefore, the requirement of each constituency for provincial seat is about 331047, but in present scenario the proportion of population is unnecessarily imbalanced as the populaiton is shown for PS-80 Jamshoro-I is about 347402 and population of PS-82 Jamshoro-III is about 318108 but if the applicant's proposed delimitation is considered than all three constituencies will be in equillibriuim.

18. That the proposed constituency of the PS-82 Jamshoro-III showing the population is stated as under, which would be consisting upon the following areas; (the list is also attached herewith)

Area Name	Population
(a) Tapo Noorpur	10022
(b) Tapo Lakha	11272
(c) Tapo Manjhand	2743
(d) Town Committee Manjhand	8467
(e) Tapo Lakhri	7487
(f) Tapo Khasai	10746
(g) Tapo Unarpur	17346
(h) Tapo Meeting	23554
(i) Tapo Khareji	3077
(j) Tapo Bundveer	519
(k) Tapo Petaro	18952
(l) Tapo Morho Jabal	35370
(m) Tapo Bada	30711
(n) Town Committee Jamshoro	34420
(o) Municipal Committee Kotri	101134
(p) Tapo Kotri	16431

Total Population of the proposed constituency is 332251

19. That it is therefore, requested that the above said areas be included in PS-82 on the basis of ground realities and geographical facts and the applicant will also agitate further grounds with the permission of this August Authority at the time of hearing of his representation / objections.

Islamabad

Dated: 28-03-2018

Sohail

Applicant

Sohail Ahmed Shoro s/o Abdul Karim Shoro

CNIC No. 41204-3683061-9

0300-3630234

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**BEFORE THE DELIMITATION AUTHORITY ELECTION
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Representation No. of 2018

Sohail Ahmed Shoro V/S Delimitation Committee
for PS-⁸⁰81 & 82

A F F I D A V I T

I, Sohail Ahmed Shoro S/O Abdul Karim R/o 1. House No. B-34, Sindh University Housing Society Phase-1, Jamshoro 2. Post Office Budha Pur, Bdyha Our, Taluka Manjhand, Dist. Jamshoro do hereby state on Oath as under:-

1. That I am Applicant in the above application so, well conversant with the facts of the case
2. That the accompanying application OBJECTIONS / REPRESENTATION AGAINST PRELIMINARY LIST ISSUED REGARDING CONSTITUENCIES OF PS-80, 81 & 82 has been drafted under my instructions and filed by me.
3. That whatever stated in the accompanying application is true and correct.
4. That whatever stated above is true and correct to the best of my knowledge and belief

Dated: 28-03-2018



Deponent
Cell No: 0300-3030234
CNIC No; 41204-3683061-9

I know the deponent, .

Islamabad
Dated: 28 03-2018


Advocate

The Deponent named above stated on Oath before me, who is identified to me by Mr. Raja Jawad Ali Saahar Advocate, who is known to me. The contents were truly, audibly and legibly explained to the deponent. Who admitted the same.

Commissioner for taking affidavit