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BEFORE THE SECRETARY ELECTION COMMISSION OF PAKISTAN ISLAMABAD

SAYED JALAL MEHMOOD.....OBJECTOR

VERSUS

1. Member of the Commission,
Delimit Constituencies.

2. Additional Secretary (Admn/Election)

Election Commission of Pakistan.....RESPONDENTS

JA 30/03/2018

OBJECTIONS REGARDING DELIMITATION OF CONSTITUENCIES BOUNDARIES/OUTLINE IN PS-80. 81 AND 82, JAMSHORO-I, II, AND III RESPECTIVELY, READ W/S 10(1) OF THE DELIMITATION OF CONSTITUENCIES ACT, 1974 AND SECTION-21 SUB SECTION (2), CHAPTER III, ELECTION ACT, 2017.

That undersigned in notebale political figure, prominent leader of Sindh and a candidate at above mentioned constituencies as well as National Assembly being aggrieved and dissatisfied with the notification passed on 25-03-2018 by Additional Secretary (Admn/Election) the Objector who has filed the objections begs to prefer the instant proposal and pray that the Commission may be pleased make such amendments, alterations or modifications in the final list of constituencies published under sub-section (3) on consideration of following facts and grounds:

FACTS

1. That the objector contested more than three times Election form same areas and well aware to Geography and homogeneity of the area. In the context of elections, it can be called re distribution and is used to prevent un balance of population cross District.
2. That the objection are filed in view of clearly identified criteria such as population distribution, community of inters convenience, geographical features and most importantly natural administrative boundaries.
3. That the Jamshoro District is comprise of four Talukas from north to south i-e (1) Sehwan (2) Manjhand (3) Kotri, (4) Thano Bola Khan respectively.
4. That as per censes 2017 Taluka Sehwan consist on 269,291/-, Taluka Manjhand consist on 140,840/- Taluka Kotri consist on 437,561/- and Taluka Thano Bola Khan consist on 145,450/-. With total of 9,93,142/-
5. That from north to south Sehwan with all its administrative units more adjacent to Taluka Manjhand and Taluka Kotri with all its administrative units more adjacent to Taluka Thano Bola Khan.
6. That Jamshoro District has only two main highways to inter connect whole District i-e from to South start Indus Highway (N-55)m which starts in District from Pir Shakh and connects other cities like Bhan Saeedabad, Sehwan, Laki Shah Saddar, Amri, Sann, Manjhand Manzoorabad and its ends at Jamshoro. The other main highway is Super highway (M9 Motorway) which start from Jamshoro and connects Kotri city and Thano Bola Khan Taluka with some geographical areas of Thatta District. Without these two highways there is no any communication connectivity to whole District (map is annexed for ready reference).

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PROPOSAL FOR THE NEW COMPOSITION OF THE CONSTITUENCY PS-80,

JAMSHORO-I

PROPOSED COMPOSITION			NOTIFIED COMPOSITION		
No & name of constituency	Extent of constituency	Population	No & name of constituency	Extent of constituency	Population
PS-80, JAMSHORO-I	a) Sehwan Taluka	269,251	PS-80 JAMSHORO-I	a) Sehwan Taluka	269251
	b) Town Committee Sann of Manjhand Taluka	12,745		b, Town committee Sann of Manjhand Taluka	12,745
	d) Whole STC Manjhand of Manjhand Takuka	56,899		c) Manjhand STC Manjhand Taluka excluding Tapedar circle Lakhri	56,899
	e) Include TC Lakhri (proposed)	7487		d, Town Committee Manjhand of District Jamshoro	8467
	f) Town Committee Manjhand of District Jamshoro	8467			
	Total	354,889		Total	347,402

GROUNDS FOR PROPOSAL COMPOSITION OF PS-80 JAMSHORO-I

1. That new proposed composition does not hit section 9 of the Delimitation of constituencies Act 1974 and section 20, chapter iii, election act 2017. Simply put, constituency delimitation is the equitable and balanced segmentation of communities into units for electoral representation.
2. That the Tapedar circle Lakhri is part and parcel of STC Manjhand which is already in PS-80 Jamshoro-I and TS Lakhri may be feasible to be included in PS-80 Jamshoro-I and excluded it from PS-81 Jamshoro-II.
3. That the convince of the people and geographic features may be given due considration.
4. That the communication approach of people to their representatives is more easier then notified composition.
5. That tepedar circle Lakhri is territorial unit and compact to STC Manjhand as well as PS-80 Jamshoro-I.

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- 6. That after excluding TC Lakhri from PS-81 there is no effect upon the population criteria.
- 7. That this composition made equality of voting strength as Taluka Sehwan as more population then Taluka Manjhand.

PROPOSAL FOR THE NEW COMPOSITION OF THE CONSTITUENCY PS-81, JAMSHORO-II

PROPOSED COMPOSITION			NOTIFIED COMPOSITION		
No & name of constituency	Extent of constituency	Population	No & name of constituency	Extent of constituency	Population
PS-81, JAMSHORO-II	a) STC Unarpur	55242	PS-81 JAMSHORO-II	a) Thano Bola Khan Taluka	145450
	b) STC Bada	85033		b, STC Bada of Kotri Taluka	85033
	b) Town Committee Jamshoro of Kotri Takuka	34420		c) TC Jamshoro of Kotri Taluka	34420
	c) MC Kotri	101134		d, The following areas of Manjhand Taluka.	55242
				1, Unerpur STC	
				2, Tepedar circle Lakhri of Manjhand STC of District Jamshoro	7487
				Total	327632
		16431			
	d) TC Kotri				
	e) TC Bolhari	40491			
	f) TC Vee	926			
	g) TC Raheer	902			
	Total	334,575			

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2. That the population of MC Bolhari is more adjacent to Taluka Thano Bola Khan and well connected with it that is the motorway M9, the population was previously part of same constituency that was PS 72 now proposed PS 82.
 3. That proposed constituency is now adjacent and also compact with each other as constituency is consist of mountain areas (Kohistan). It is also geographically and communicatively with each other.
 4. That except this population M.C Bolhari if any other area connected with PS 82 Jamshoro-III that people of that first connect with area of M.C Bolhari then lead to Thano Bola Khan which is head quieter of PS-82.
 5. That your honor already proposed PS-82 consist of 327632 the different areas of three talukas that Thano Bola Khan, Kotri, Manjhand, although Taluka Manjhand is far away because of non-convenience of communication. While MC Bolhari of Taluka Kotri is the only nearest area which is geographically compact with Thano Bola Khan so if proposal accept in that formation PS-82 will be on two taluka population.

PRAYER

It is prayed that constituency is very important component in the democrat process. It is basic unit in selection of representatives of the area. Thus constituencies are drawn on the basis of equity, fairness and balance to ensure representation in political participation. So in this regard may kindly alter or modify and re-distribute the boundaries of PS 80, PS-81, and PS-82 Jamshoro-I,II, and III in the larger interest of people of District Jamshoro.

The prayer is made best interest of justice.

Dated: 28-3-2018


Applicant/Objector