

BEFORE SECRETARY ELECTION COMMISSION
OF PAKISTAN ISLAMABAD

Khuda Bux S/o Allah Bachayo, By Caste Thebo,
R/o Manzoorabad Taluka Manjhand,
District Jamshoro.....Objector/Representative

VERSUS

1. Member of the Commissioner,
Delimit Constituencies.
2. Additional Secretary, (Admn / Election)
Election Commission of Pakistan.....Respondents

INDEX OF DOCUMENTS RELIED UPON

Representation

S. NO.	DOCUMENTS ATTACHED	ANNEXURES
1.	Certified copy of notified Map by Provincial Election Commission of Pakistan of District Jamshoro.	"A"
2.	Proposed copy of Map District Jamshoro	"B"
3.	Voter Certificate of questioned constituency.	"C"
4.	Officially census report of District Jamshoro published by Pakistan Bureau of Statistics.	"D"

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OBJECTIONS / REPRESENTATION 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 is a political and social worker of District Jamshoro, dissatisfied with the notification passed on 05-03-2018 by Additional Secretary (Admn/Election) the Objector who has filed the objections begs to prefer the instant proposal and pray that the Commissioner 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 objection are filed in view of clearly identified criteria such as population distribution, community of interest, convenience, geographical features and most importantly natural administrative boundaries.
2. 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.

3. That as per census 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/-.
4. That from North to South Sehwan will all its administrative units more adjacent to Taluka Manjhand and Taluka Kotri with all its administrative units more adjacent to Taluka Thano Bola Khan.
5. That Jamshoro District has only two main highways to inter connect whole District i.e from North to South Indus Highway (N-55) 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 communication connectivity to whole District (map is annexed for ready reference).

**PROPOSAL FOR THE NEW COMPOSITION OF THE
CONTINUANCE PS-80, JAMSHORO-I.**

PROPOSED COMPOSITION			NOTIFIED COMPOSITION		
No & Name of constituency	Extend of constituency	Population	No & Name of constituency	Extend of constituency	Population
PS-80 Jamshoro-I	(a) Sehwan Taluka	269,251	PS-80 Jamshoro-I	(a) Sehwan Taluka	269,251
	(b) Town Committee Sann of Manjhand Taluka	12,745		(b) Town Committee Sann of Manjhand Taluka	12,745
	(c) Whole STC Manjhand of Manjhand Taluka	56,899		(c) Manjhan	56,899
	(d) Include TC Lakhri of STC Manjhand of Taluka Manjhand (Proposed)	7487		(d) STC Manjhand Taluka excluding Tapedar Circle Lakhri	
	(e) Town Committee Manjhand of District Jamshoro	8467		(e) Town Committee Manjhand of District Jamshoro	8467
TOTAL		354,889	TOTAL		347,402

**GROUNDS FOR PROPOSED COMPOSITION OF PS-80,
JAMSHORO-I**

1. That new proposed composition does not hit section 9 of the Delimitation of constituencies Act 1974, simply put, constituency delimitation is the equitable and balanced segmentation of communities into units for electoral representation.
2. That the Tapedari Circle Lakhri is part and parcel of STC Manjhand which is already in PS-80 Jamshoro-I and TC Lakhri may be feasible to be include in PS-80 Jamshoro-I and exclude it from PS-81 Jamshoro-II.

30/07/2018

3. That the convenience of the people and geographic features may be given due consideration.
4. That the communication approach of the people to his representatives is more easier then notified composition.
5. That Tapedari circle Lakhri is territorial unit and compact to STC Manjhand as well as PS-80 Jamshoro-I.
6. That after excluding TC Lakhri from PS-81 there in no effect upon the population criteria.
7. That this composition made equality of voting strength as Taluka Sehwan has more population than Taluka Manjhand.

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

PROPOSED COMPOSITION			NOTIFIED COMPOSITION		
No & Name of constituency	Extend of constituency	Population	No & Name of constituency	Extend of constituency	Population
PS-81 Jamshoro-II	(a) STC Unarpur of Taluka Manjhand	55242	PS-81 Jamshoro-II	(a) Thano Bola Khan Taluka	145450
	(b) STC Bada of Taluka Kotri	85033		(b) STC Bada of Kotri Taluka	85033
	(c) Town Committee Jamshoro of Kotri Taluka	34420		(c) TC Jamshoro of Kotri Taluka	34420
	(d) MC Kotri of Taluka Kotri	101134		(d) The following areas of Manjhand Taluka.	55242
	(e) TC Kotri of Taluka Kotri	16431		(i) Unarpur STC	7487
	(f) TC Bolhari of Taluka Kotri	40491		(ii) Tapedari Circle Lakhri of Manjhand STC of District Jamshoro	
	(g) TC Vee of Taluka Kotri	926			
	(h) TC Raheer of Taluka Kotri	902			
	TOTAL	344,575		TOTAL	327632

GROUND FOR PROPOSED COMPOSITION OF PS-81, JAMSHORO-II

1. That this constituency immediately starts after PS-80 Jamshoro-I.
2. That the notified constituency i.e PS-81 hit the principles of Delimitation, as it is clearly mentioned that constituency must be compact area, facilities of communication and above all public convenience.
3. That there is no communication way because Thano Bola Khan only connect to notified constituency through mountain ways (trails/Paths) the only way to people of area approach their representatives by this way is to adopt first Super Highway M9, it is almost more then ninety km, so proposed composition is more convenient to the people of the area.

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4. That an other cogent reason is existing boundaries of administrative units is more adjacent to Taluka Kotri rather then Taluka Thano Bola Khan.
5. That it means approach of people is more easier to proposed constituency then notified constituency.
6. That it is further submitted geographically and culturally communities are such convenient to proposed constituency i-e PS-81 Jamshoro-II.

**PROPOSAL FOR THE NEW COMPOSITION OF THE
CONTINUANCE PS-82, JAMSHORO-III**

PROPOSED COMPOSITION			NOTIFIED COMPOSITION		
No & Name of constituency	Extend of constituency	Population	No & Name of constituency	Extend of constituency	Population
PS-82 Jamshoro-III	(a) MC Bolhari of Taluka Kotri	158224	PS-82 Jamshoro-III	(a) Kotri Taluka excluding following areas.	318108
	(b) Taluka Thando Bola Khan	145450		(i) Bada STC and (ii) TC Jamshoro of District Jamshoro	
	TOTAL	303674		TOTAL	318108

**GROUND FOR PROPOSED COMPOSITION OF PS-82,
JAMSHORO-III**

1. That there is TC Bolhari consist on both urban and rural population. The urban population which consist MC Bolhari i-e 158224 and rural population i-e 40491. There is no way to balance the population of all three provincial constituency but to divide the population of TC Bolhari, into MC Bolhari and rural Bolhari.
2. That the population of MC Bolhari is more adjacent to Taluka Thano Bola Khan and well connected with it that is motorway M9, the population was previously part of same constituency i-e PS-72 now proposed PS-82.
3. That proposed constituency is also compact with each other as constituency is consist of mountain areas (Kohistan). It is also geographically and commutatively 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 the lead to Thano Bola Khan which is head quarter of PS-82.

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5. That your honor already proposed PS-82 consists on 327632 of three talukas that Thano Bola Khan, Kotri, Manjhand, as Taluka Manjhand is too away because of convenience of communication while MC Bolhari of Taluka Kotri only near area which is geographically compact with Thano Bola Khan so if undersigned proposal except in that formation PS-82 will be on two taluka population.

PRAYER

It is prayed that constituency is very important component in the democratic process. It is basic unit in selection of representatives of the area. Thus constituencies area 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 redistribute the boundaries of PS-80, PS-81 and PS-82 Jamshoro-I,II and III in the larger interest of the people of District Jamshoro.

The prayer is made best interest of justice.

Dated:

28-03-2018


Objector/ Representative