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BEFORE THE SECRETARY ELECTON COMMISSION OF
PAKISTAN

REPRESENTATION UNDER CHAPTER 3 RULE 12 SUB
RULE 4 OF THE ELECTION RULES 2017 REGARDING
NA 259, NA 260, NA 262.

That the petitioner is voter member of District Kachi and the following facts and grounds were overlooked /not considered by this commission while preliminary list of constituency was published under Rule 11 (2) of Election Rules 2017 for the proposed de-limitation of the above mentioned constituencies.

FACTS:

1. As per the proposed draft prepared by the de-limitation committee on form 5 and published by this commission under Rule 11(2) of Election Rules 2017, NA 259 is comprised of the following districts:

(a) Dera Bugti District	Population : 312603
(b) Kohlu District	Population : 214350
(c) Barkhan District	Population : 171556
(d) Sibbi District	Population : 135572
(e) Lehri District	Population : 115975
Total Population : 950,056	

2. As per the proposed draft prepared by the de-limitation committee on form 5 and published by this commission under Rule 11(2) of Election Rules 2017, NA 260 is comprised of the following:

Naseerabad District Population: 492,609

3. As per draft proposed draft prepared by the de-limitation committee on form 5 and published by this commission under Rule 11(2) of Election Rules 2017, NA 262 is comprised of the following:


(a) Kachhi District	Population : 237030
(b) Jhal Magsi District	Population : 149225
Total Population: 386,255.	

4. That petitioner submits memorandum of representation inter alia on the following:

The following relevant factors and circumstances were overlooked, which are necessary for the welfare and well-being of the people of the constituencies, as well as fair play.

- (a) That the people of Balochistan are living in tribes since ages. They share a common value system and customs. Their combined intellect is an extract of the community based living structure. In particular, the population of tribes living in the districts of Jhal Magsi and Naseerabad hailing from the common tribes has been divided into different constituencies in the name of de-limitation process.
- (b) That as per overall population of the province of Balochistan, one constituency must contain at least 700000 people.
- (c) That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to the distribution of population in geographically compact areas. In terms of newly created constituencies, geographic hurdles shall hinder the smooth living of the local people.
- (d) The resources of the province are shared by the inhabitant tribes in terms of settled agreements among them, but any irregular change in the population of the constituencies will result in mal-function of the administration. It may further escalate to the point of violence among the tribes.
- (e) That as per the section 20 (3) of Election Act 2017, the variation in population of constituencies of an assembly or a local government shall not ordinarily exceed 10%.
- (f) That earlier, Kachhi and Lehri constituted one constituency and people from both areas enjoyed numerous water facilities such as dams etc. However, due to de-limitation and change in administration people from these areas are no longer able to enjoy these facilities.
- (g) That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to the physical features. By implementing the newly proposed constituencies, the outlook of the vicinity shall exhibit anomalous physical division of the terrain. For instance, districts of Sibbi and Barkhan have been combined in NA 259 in the Government proposal, whereas there is no direct route between these districts and a mountainous range of approximately 180-190 Kms physically disconnects both the regions.
- (h) That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to

Total Population: 488,577

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Detailed arguments/maps/facts shall also be placed before this honorable commission.

PRAYER:

It is therefore, respectfully prayed that the proposal based upon amendment/alteration and modification submitted by the petitioner in the body of the petition may kindly be declared as the area of the constituencies of NA-259, NA-260, and NA-262 in the interest of justice.


Petitioner

Mir Sardar Khan Rind S/o Sardar
Yar Muhammad Rind Mohala Rind,
Post Office Khas Shoran

Tehsil Sunny, District Kachi

Phone No.

Voter Serial No. 120

Home No. 54

Through


BABAR AWAN
Senior ASC

Sitara-e-Imtiaz, Nishan-e-Imtiaz

BABAR AWAN & ASSOCIATES

House No. 3. Street No. 56, F-8/4, Islamabad
38-First Floor, Sadiq Plaza, the Mall Lahore

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**BEFORE THE SECRETARY ELECTON COMMISSION OF
PAKISTAN**

Petition No...../2018

**REPRESENTATION UNDER CHAPTER 3 RULE 12 SUB
RULE 4 OF THE ELECTION RULES 2017 REGARDING
NA 259, NA 260, NA 262.**

AFFIDAVIT

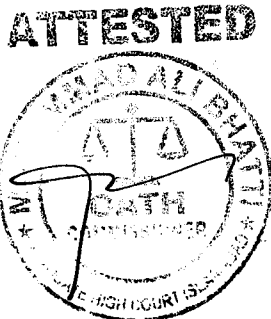
That I, Mir Sardar Khan Rind S/o Sardar Yar Muhammad Rind Mohala Rind, Post Office Khas Shoran Tehsil Sunny, District Kachi, Do Hereby solemnly affirm and declare as under.

That the contents of this application are true and correct to the best of my knowledge and belief and nothing has been concealed therein.

[Handwritten signature]
Deponent

VERIFICATION:-

Verified on oath, on 2nd day of April 2018 at Islamabad that the contents of this affidavit are true and correct to the best of my knowledge and belief therein.



This Affidavit has been sworn before me on this.....Day of20..... by the deponent who is personally known / identified by.....
Certified further that the contents of the affidavit have been read and explained to the deponent who has understood and attested the same Serial No.....

[Handwritten signature]
Deponent

**MIRZA ALI BHATTI
ADVOCATE HIGH COURT
OATH COMMISSIONER
ISLAMABAD**

02 APR 2018