

To,

The Honorable Secretary Election Commission of Pakistan

**Subject: Representation / Objection Under Section 10(2) of the Delimitation of Constituencies Act, 1974 to the Preliminary Drafty Proposal of Delimitations of NA-259 Dera Bughti – cum – Kohlo-cum-Bakhan-cum-Sibi-cum-Lehri**

Respected Sir,

The petitioner most respectfully submits as under:

1. That the petitioner is law abiding and faithful citizen of Pakistan and is permanent resident of District Dera Bugti, Baluchistan Province and is Central President of Jamhoori Watan Party.
2. That the petitioner being a voter of NA-259 Dera Bughti – cum – Kohlo-cum-Bakhan-cum-Sibi-cum-Lehri enlisted at serial number 280 of Electro role of Dera Bugti Town, District Dera Bugti, in the coming Election of National and Provincial Assembly of Baluchistan through the instant representation to submit following objections upon the delimitation of constituency of NA-259, Dera Bughti – cum – Kohlo-cum-Bakhan-cum-Sibi-cum-Lehri.
  - a) That due to the delimitation of above said constituency the candidates as well as the voter of area will face great problems in the election campaign as well as to reach on each and every polling station or to contact all the voters of the area.
  - b) That the District Harnai was a part of this constituency which was easily accessible to the candidates while the same was de-attached and the District BarKhan was attached with the above said constituency which is far flang area and there is no approved road to connect the same with the Dera Bugti or Sibi while the people of the area go to District BarKhan via Quetta Loralai, which takes 10-15 hours to reach the District BarKhan.
  - c) That due to the delimitation of NA-259 its population become 950086 while the neighbouring constituencies NA-260 Naseerabad's population is 492609 and population of NA-262 Kachhi-cum-Jhal Magsi's population is 386255.
  - d) That the NA-260 is comprising only one District i.e. District Naseerabad and NA-262 is comprising on two districts i.e. District Kachi and District Jhal Magsi while the NA-259 is comprising on 5 districts i.e. Dera Bugti, Kohlu, BarKhan, Sibi, and Lehri which consists upon 120 square kilometers and the access of the whole constituency is unable for a candidate to his election campaign, beside this the more parts of the constituency are dangerous and law and order situation is not good.
  - e) That due to the law and order situation more than 175000 local inhabitants of District Dera Bugti are out of district and residing in different cities of Pakistan as IDPs and their names are not enlisted in the electro roll of NA-259 in this respect the General Secretary of Jamhoori Watan Party submitted an application to the Minister Saifran as well as to the Honorable Chief Election

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Commissioner of Pakistan and the same are still in process and no fruitful result was came out so far.

That under section 9 of Delimitation of Constituency Act, 1974, Principal of Delimitation are as under "*All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in geographically compact areas, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation constituencies*".

That while for delimitation of constituency of NA-259 the above said principales were totally ignored and under section 10(3) as well as under section 10A your honor is competent to make amendment, alteration or modification in the final list of constituencies. Hence this representation.

It is therefore prayed that after holding inquiry and calling for record your honor may kindly make amendment / alteration / modification in the preliminary list published under sub section (1) of section 10 in respect of the constituency of NA-259 Dera Bughti – cum – Kohlo-cum-Bakhan-cum-Sibi-cum-Lehri and the previous limits of said constituency be restored.

Thanks in anticipation!

Date: April 3, 2018

**Nawabzada Shahzain Bugti**

S/O Nawabzada Talal Akbar Bugti

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Through Attorney

**Muhammad Ibrahim Lehri**

Central Sectary General  
Jamhoori Watan Party



List of Relied / Attached documents:

- i) CNIC of Petitioner
- ii) Form 5 [ see rule 10(7)] Draft List of Constituencies
- iii) Copy of Map of NA-259
- iv) Copy of Map of NA-260
- v) Copy of Map of NA-262
- vi) Copy of application dated 11<sup>th</sup> January 2018 submitted to Chief Election Commissioner.
- vii) Copy of application dated 11<sup>th</sup> January 2018 submitted to Minister Saifran.
- viii) Copy of letter dated 18<sup>th</sup> February 2018 issued by Ministry of Saifran.
- ix) Copy of Authority Letter