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**BEFORE THE ELECTION COMMISSION OF PAKISTAN**

Abdul Naeem Nasar son of Haji Ghulam Jellani resident of Killi New Nasrahn Jellani,  
Bostan, Tehsil Karizat, District Pishin.

Petitioner

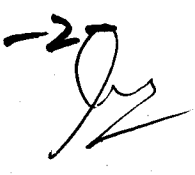
**REPRESENTATION UNDER SECTION 20 & 21 OF THE ELECTION ACT, 2017  
READ WITH RULE 10 & 11 OF THE ELECTION RULES, 2017 AGAINST  
DELIMITATION NOTIFICATION SPECIFYING THE AREAS I.E. BOSTAN  
PATWAR CIRCLE OF BOSTAN QANONGO HALQA OF KAREZAT TEHSIL TO  
BE INCLUDED IN PB-25 QUETTA-I FROM PB-19 PISHIN-I OR ALTERNATIVELY  
BE REVERTED BACK TO ITS ORIGINAL POSITION IN PB-08.**

Respectfully submits as under:

1. That the petitioner namely ABDUL NAEEM NASAR son of HAJI GHULAM JELLANI resident of KILLI NEW NASRAN JELLANI BOSTAN, TEHSIL KARIZAT, DISTRICT PISHIN and is duly registered as a voter bearing statistical block code no.453020309, silsila no.258, constituency GHULAM JILLANI, Tehsil KAREZAT, District PISHIN as proposed constituency PB-19. presently the petitioner is member District, Pishin.

(Copy of vote details and CNIC are annexed herewith)

2. That the delimitation committee has totally ignored the principles of delimitation of the constituencies having regard to the distribution of population and geographically compact areas, existing boundaries of administrative units, facilities of communications and public convenience and other cognate factors to ensure homogeneity in the creation of the constituency.
3. That the commission can delimit territorial constituencies having regard not only to distribution of population but also geographically compact areas, physical features, existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of constituencies but in delimiting the proposed constituencies i.e PB-19, PB-20 PB-21 commission only consider population factor and remaining are totally ignored.

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4. That the police stations, post offices, public health drinking water supply schemes, basic health units QESCO Grids, SSGC of the above mentioned Patwar Circle BOSTAN, all are falling in PB-25.
  5. That above mentioned Patwar Circle BOSTAN are included in proposed constituency PB-19 i.e PASHIN-I, for the purpose of local government ,revenue, district administration, if the proposed delimitation is not changed and not brought to the proper position or alternatively to its previous position than the population of above mentioned Patwar Circle BOSTAN will definitely be deprive from the its funds including hardship in approaching administrative problems regarding police, revenue, health, clean drinking water, education business and transport.
  6. That the notification regarding delimitation specifying the above mentioned Patwar Circle BOSTAN are included in PB-19 i.e PASHIN-1 from previous delimitation i.e PB-08 has been prepared without any representation, holding inquiry or recording any evidence regarding physical features of the areas, existing boundaries, administrative units, communication facilities, public convenience, therefore, applicant pray for amendments, alteration, modification in the said notification specifying the above mentioned Patwar Circle BOSTAN proposed to be included in PB-25 or alternatively reverted back to its previous position in i.e PB-08.

#### GROUNDS

- I. That the population of the above mentioned Patwar circles BOSTAN has no direct access or road leading to PB-19 headquarter KHANUZAI, is located for from its said headquarter and the above mentioned areas are geographically located in hilly area and desert having only easy access to PB-25 headquarter district Quetta thus the inclusion of above mentioned areas in PB-19 will definitely create enormous hardships for the population concerned.
- II. That inhabitant of the above mentioned areas will have to travel for redressal of their grievances a long distance as there is no facilities of communications directly to PB-19 headquarter from above mentioned areas, however, if the NOTIFICATION regarding delimitation is amended to the extent that the above mentioned patwar circles/areas are left with PB-25 than the population would have better communication facilities, public convenience including other

facilities regarding health, revenue, postal, education, law enforcement assistance etc.

- III. That the new Halqa Bandi done by Election Commission of Pakistan is on the basis of population instead of taking into consideration of geographical, physical, cultural and actual position of areas /union councils. No inquiry, survey or investigation has been conducted by authorities while issuing the impugned notification. That why, the halqas formed/announced by this notification are not proper, well planned, geographically well designed. Same problems are existing in District PISHIN. The union councils included in this halqa is not geographically well designed for public connivance, ease and wellbeing. It is important to mention here that distribution of district is not well in line neither according in width nor in length.
- IV. That the above mentioned areas having such geographical ,physical features that if the said areas are not included and left with PB-19 than the whole population will face enormous difficulties and the whole public life would become stand still without undertaking long travel to PB-19 headquarter KHANUZAI.
- V. That the other areas located with PB-25 headquarter in geographical compactness are there which can easily be included and such delimitation of those areas would not harm or hinder in the daily life of the population.
- VI. That the population of above mentioned Patwar Circles is not willing to be included in PB-19 because of the above mentioned hindrances and hardships to be face by the population and feature in case they remained in PB-25 apart from the above mentioned resolution Tehsil council areas have also past resolution regarding their reservation on such proposed inclusion of above mentioned areas in PB-25.
- VII. That the Patwar circle BOSTAN is at the border of PB-25 i.e. Quetta and on the other hand this Patwar Circle is far away from PB-19 PISHIN and there is no population which connect BOSTAN with PB-19. These amalgamations of Patwar Circle with PB halqas are made without exercise of physical survey by the concerned authorities during the delimitation process. Which is highly inconvenience and against the fundamental rights of the population of this Patwar Circle.



VIII. That all the community schools which is actually and geographically located in the District PISHIN but its funds and other grants and take care is done by District QUETTA.

IX. That if the proposed inclusion of above mentioned Patwar Circle in PB-19 is not amended, altered, modified, and the said areas are not left in existing status with PB-25 or alternatively reverted back to its previous position i.e. PB-08 than petitioner along with the entire population of the areas will have to suffer irreparable loss for the rest of their life they will have to face inconvenience regarding their revenue matters, health and education facilities including law enforcement, communication, transport etc. therefore such proposed inclusion of said areas in the final notification delimitation need to be amended, modified, and reversed to its original position in the larger interest of the population of above mentioned areas.

X. That the total population of PB-19 is 241886 and if the Bostan Patwar Circle whose population is 47704 be excluded from PB-19 then the remaining population of PB-19 will be 194142 that still exceeds beyond the number of population according to PB-22 i.e. 182851 and PB-23 is 167404. However, if the Bostan population is added to PB-25 Quetta-I (current population of PB-25 Quetta-I i.e. 237598) then it will become 285302 while the PB-26 Quetta-II total population is 267654. Therefore, if BOSTAN patwar circle will be excluded from PB-19 and added in PB-25 than population of these two constituencies will remain in accordance with adjacent constituencies.

XI. That any other additional grounds will be raised at the time of arguments with the prior permission of this Honorable Forum.

**PRAYER:**

It is therefore, most respectfully prayed that the representation of applicant may graciously be accepted in light of above stated submission and the said Patwar Circle BOSTAN may graciously be included in PB-25 or alternatively be reverted back to its previously original position as PB-08.

Any other relief which this Honorable Forum deems fits and proper may also be granted to the applicant.

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Petitioner  
Abdul Naeem Nasar  
Son of Haji Ghulam Jellani

Through



VALUE COURT  
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