

BEFORE THE HON'BLE SECRETARY ELECTION
COMMISSION OF PAKISTAN AT ISLAMABAD.

1/27
04/04/2018

IN THE MATTER OF DELIMITATION OF THE CONSTITUENCY PB 26-
II, PB-27, PB-29 QUETTA PROPOSED IN THE PRELIMINARY REPORT.

MEHMOOD AHMED S/O ABDUL GHAFOR

Adult Muslim,

R/o Killi New Essakhail Hanna Urak,

Tehsil and District Quetta

.....Objector

REPRESENTATION UNDER RULE 12 OF ELCTION RULES, 2017

Brief Background:

1. That the objector is a registered voter and is aggrieved of the preliminary report of the proposed delimitation:

**Vote certificate is attached and
marked as Annexure." A**

2. That nine (9) number of constituencies have been carved out of the the six constituencies earlier existed after the recent census.

3. That after the census held in year 2017, the Election Commission of Pakistan has triggered the process of delimitation under Rule 17 of Election rules 2017.
4. That as per the census held in the year 2017, District Quetta has population of 2,275,699/-. Whereas as per the census in the year 1998, the total population of District Quetta was 773,936/-.
5. That a havoc has been played while delimiting District Quetta. The historical presence of UC-Sarahgurgi and UC-Hanna has been done away with by including it in PB-29.
6. That astonishingly, the UC-Hanna and UC-Saraghurgi are adjacent to, UC-Nawa killi Ward No: 50, UC-Kotwal Ward No : 49, but have been included in PB-29. The residents of UC-Hanna and UC-Saraghurgi use the route of Ward No: 49&50 to access the city and PB-29 since long. Further army cantonment area falls in between UC-Hanna and UC-Saraghurgi making it impossible for the locals of said UCs to move towards the city area due to strict security surveillance in the cantonment area. Thus they use Ward No: 50 to access to PB-29 and it is highly inconvenient for the people of the said UCs.

7. That the locals said UCs will not be in a position to have any sort of benefits from their representatives of PB-29 as PB-29 has been extended to Jan Mohammad Road, the north end of Quetta city, which is geographically unnatural.
8. That by inclusion of UC-Hanna and UC-Saraghurgi into PB-29 has disrupted the historical status of the area in a sphere having inhomogeneous population and defying the tribal character of the area. Thus, would result in the infringement of the rights of general public of the locality.
9. That area in consideration is poverty stricken, impoverished, and backward and its inclusion in PB-29 would be injustice with the locals of the mentioned areas.
10. That apart from the above, the inclusion of UC-Hanna and UC-Saraghurgi would neither be geographically sound nor as per its physical features as it would deprive it from facilities of communication.
11. That the preliminary proposal is sheer violation of the statutory provisions of section 20, wherein it is stated that all constituencies for general seats, as far as practicable be delimited heaving regard

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to the distribution of population in geographically compact, physical features existing boundaries of administrative units, facilities of communication and public convenience and other cognate factors to ensure homogeneity in the creation of the constituencies.

12. That the proposed primary delimitation is against the principle of delimitation and this tantamount to disenfranchising the electors. As such the same, to ensure the political justice may be reversed and restored to its original position on consideration of following amongst other grounds.

SUGGESTIONS/PROPOSALS:

- A. That the impugned delimitations suffers from stacking, packing and cracking which fact find support from the fact that a complete district (i.e. Quetta) has been included in PB-26-II Quetta-cum-Ziarat. Thus it would cause great inconvenience for the locals of District Quetta. Therefore, at the first instance, it is proposed that the original status of District Quetta PB-22 be restored in its historical position in order to enable the locals to have effective representation in the provincial assembly.

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- B.** That criteria for a seat of provincial assembly has been fixed by the Hon'ble Election Commission at 242000. The population of UC-Hanna is 14485, whereby UC-Saraghurgi is 11730, Sarakhula 639, which can easily be included in PB-26-II and when these areas would be excluded from PB-29, the population of PB-29 will decrease to 233,333. Which is near to the criterion set by the Hon'ble Election Commission and PB-29 will not suffer heavily.
- C.** That PB-27 has the population of 223044, if the area of Samungly of UC-52 being adjacent to PB-27 and having population of 29583 is included in PB-27 the population where of would reach to 252627. Which also falls in relaxation given by the Hon'ble Election Commission.
- D.** That incase of inclusion of UC-Hanna and UC-Saraghurgi and Sarakhula in PB-26 the population of PB-26 would be 294508. However, while excluding samungli area of UC 52 having population of 29583 from PB 26II and if included in PB 27, the population of PB-26 would remain as 264925.
- E.** The mining area and zarkhu having population of 15624 be either made part of PB 26II or retained in PB-29, as it deems appropriate

F. That other/additional grounds shall be raised at the time of oral hearing of this representation.

In view of the above mentioned grounds, it is humbly requested that the preliminary proposals may kindly be amended as per the suggested amendments in the best interest of justice and welfare of the public.

Petitioner/ Objector

Ahmed.

**MEHMOOD AHMED S/O
ABDUL GHAFOOR**

**R/o Killi New Essakhail
Hanna Urak,**

Tehsil and District Quetta.

**CNIC NO: 54400-0485800-
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CELL NO : 03138200715

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