

**BEFORE THE ELECTION COMMISSION OF PAKISTAN**

Objection No. \_\_\_\_\_/2018

Malik Kamran Bangalzai s/o Ghulam Qadir holding CNIC 54400-0627892-7  
r/o Burma Hotel Muhalla Kalli Lore Karez, Saryab Road, Quetta

**Complainant****OBJECTION MEMORANDUM UNDER SECTION 21(3) OF THE  
ELECTION ACT WITH REGARD TO PB-31,QUETTA-VII READ WITH  
CONDUCT OF ELECTION RULES AND ALL OTHER ENABLING  
PROVISIONS OF LAW FOR THE TIME BEING ENFORCED IN PAKISTAN.**

Respectfully Sheweth:-

**FACTS**

1. That the petitioner is a political worker from Quetta who intends to contest elections.
2. That the notification of ECP regarding delimitation issued on 5th March 2018 is a preliminary report and a draft proposal which is full of deficiency and requires to be modified/changed.
3. That the Notification itself says that to organize election honestly, justly and fairly but in this particular case, unjust delimitation has been made.
4. This delimitation of old PB-5, Quetta-v has been divided into three new constituencies' i.e. PB-31, Quetta-VII PB-32, Quetta-VIII and PB-33, Quetta-X is in violation of constitutional Right of the people living in these constituencies. The details of the constituencies are as follows:

**PB,31-QUETTA- VII**

The following census charges of Metropolitan Quetta:

- i. Charge No.13                              117381
- ii. Charge No.14 of qta District. 130078

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**TOTAL 247459**

**PB,32-QUETTA- VIII**

Patwar Circle KechiBaig-III of QanungoHalqaKechiBaig of tehsil city of Quetta  
District

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**TOTAL    278446**

**PB,33-QUETTA- X**

a) The following Patwar Circles KechiBaig-II of QanungoHalqaKechi  
Baig of thesil:

- i. KechiBaig-I 72363
- ii. KechiBaig-I 26200

b) The following Patwar of QanungoHalqa  
Shadenzai of city thesil :

- i. Shadenzai-II                              77477
- ii. Shadenzai-III 47464

Of Quetta District

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**Total 223505**

4. The above table clearly shows that adjacent areas have not been considered unreasonably while planning for these constituencies.
5. Due to unfair distribution of delimitation in this new constituency of PB-31, people of the area have been deprived from their Political Right to Vote. Their votes have been unfairly shifted into another constituency.
6. The homogeneity of the constituency has not been kept fore while making delimitations and this has created public inconvenience which is flagrant violation of very essence of delimitation.



7. The Patwarcircle KechiBaig-II which is naturally and geographically contiguous to the constituency of PB-31, Quetta- VII, has intentionally been shifted to PB-33, Quetta- IX without considering the ground realities.

**Prayers**

1. Patwar circle Khechibaig-II may be incorporated in PB-31, Quetta-VII keeping in view its contiguous boundary with PB-31, Quetta-VII.
2. PB-32, Quetta- VIII has population of 278446 which is in excess to the required population under ECP rules i.e, 242000. About 36000 people/voters are in excess and may be adjusted with PB-33, Quetta-X, both the constituency have common boundary and in this way equal distribution among the constituencies can also be ensured.
3. Any Other relief deemed fit

Through:-

OBJECTOR  
 Voter number 451130301  
 serial number : 592

Barrister Safiullah Ghauri  
 ESQUARE LEGAL

Kamran Hashmat  
 ESQUARE LEGAL

Hisam Salahuddin  
 ESQUARE LEGAL

Liaqat Shahwani  
 ESQUARE LEGAL

Dated: 03.04.2018