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M. H. Khan
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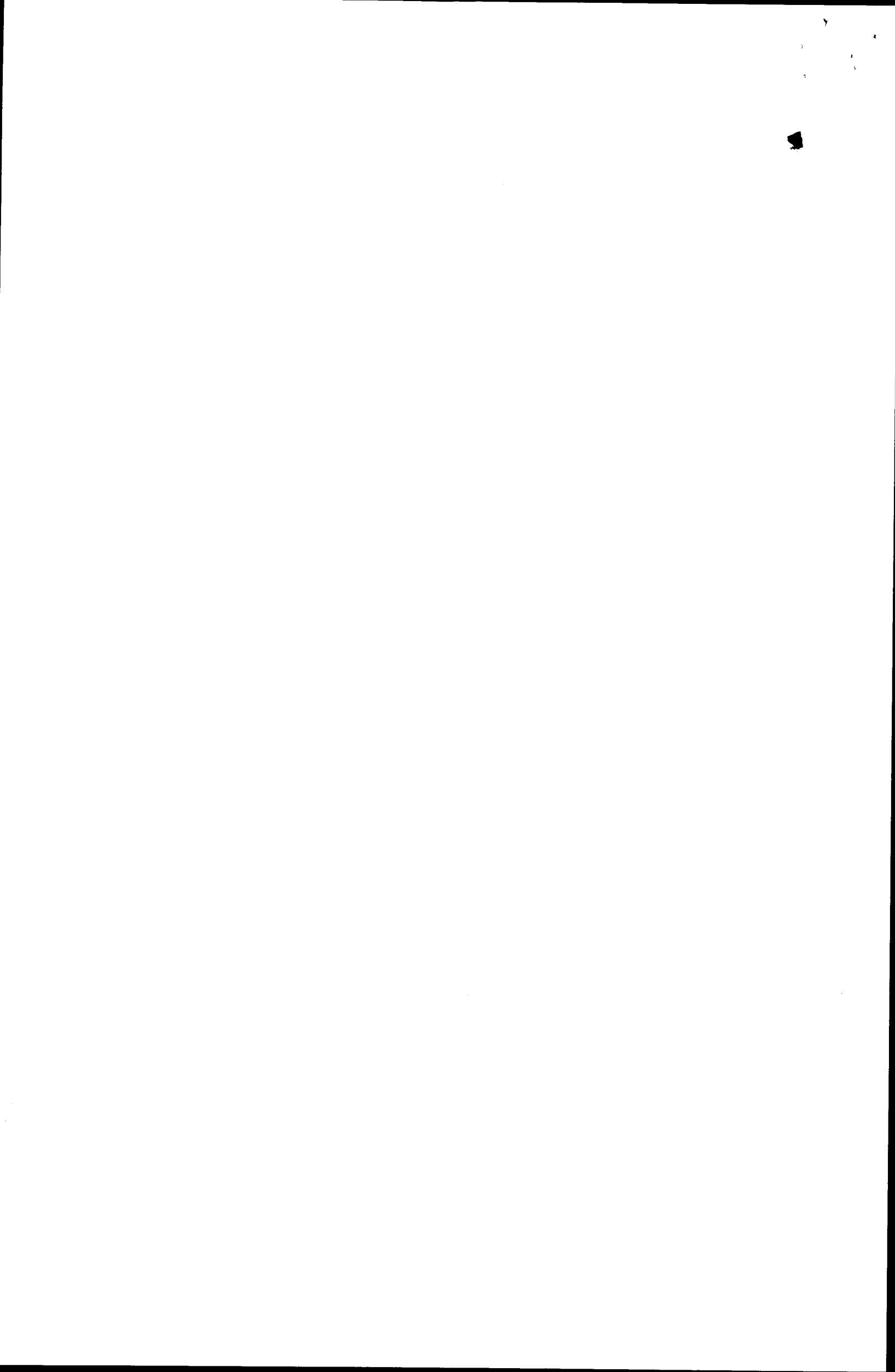
IN THE ELECTION COMMISSION OF PAKISTAN

Representation No. ____/2018

SUBJECT:- REPRESENTATION CUM OBJECTIONS IN TERMS OF SECTION 21 OF THE ELECTIONS ACT, 2017 R/W RULE 12 OF ELECTION RULES, 2017 FURTHER R/W ARTICLE 218 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.

The applicant most respectfully submits as under:-

1. That the applicant is a registered voter of Yadgar-2 in Tehsil Dalbandin District Chagai now part of PB-35 Chagai and NA-268, having Shumariyat Block Code 455010304, Silsila No.409, as such, interested in democratic norms, election in the country, particularly in the delimitation of his own constituency, hence has a right to make representation and raise a voice against incorrect delimitation process.
2. That the above constituency is part of Balochistan which is the largest province in measurement but smallest in population, the area of this part of country is 347190 Square Kilometer while the population is 12344739, to the National Assembly sixteen general seats have been allocated for Balochistan in the forthcoming elections, whereas three are meant for women. Similarly in the Provincial Assembly fifty one seats of Provincial Assembly's candidates are to be elected directly while eleven and three seats have been reserved to women and the minorities respectively.
3. That the constituencies of National Assembly in Balochistan are based on some data which has recently been notified by this Commission, detail whereof is given below:-



Ser	NA	Constituency	Districts	Population
i).	257	Killa Saifullah cum Zhob cum Sherani	a) Killa Saifullah b) Zhob c) Sherani	806474
ii).	258	Loralai cum Musa Khail cum Ziarat cum Duki cum Harnai	a) Loralai, b) Musakhail, c) Ziarat, d) Duki, e) Harnai	821856
iii)	259	Dera Bugti cum Kohlu cum Barkhan cum Sibi cum Lehri	a) Dera Bugti, b) Kohlu, c) Barkhan, d) Sibi, e) Lehri	950056
iv).	260	Nasirabad	Nasirabad	492609
v).	261	Jaffarabad cum Sohbat Pur	a) Jaffarabad b) Sohbatpur	714351
vi).	262	Kachi cum Jhal Magsi	a) Kachi b) Jhal Magsi	386255
vii).	263	Pishin	Pishin	736481
viii).	264	Killa Abdullah	Killa Abdullah	757578
ix).	265	Quetta-I	Quetta	728296
x).	266	Quetta-II	Quetta	797994
xi).	267	Quetta-III	Quetta	749409
xii).	268	Mastung cum Chagai cum Kalat cum Shaheed Sikandarabad cum Noshki	a) Mastung b) Chagai, c) Kalat, d) Shaheed Sikandarabad, e) Noshki	1083497
xiii).	269	Khuzdar	Khuzdar	802207
xiv).	270	Panjugur cum Washuk cum Kharan cum Awaran	a) Panjugur, b) Washuk, c) Kharan, d) Awaran	770754
xv).	271	Kech	Kech	909116
xvi).	272	Lasbella cum Gwadar	a) Lasbella, b) Gawadar	837806

4. That similar detail in Provincial Assembly (PB) is given

below:-

PB	Constituency	Population
1	Sherani	153116
2	Zhob	310544
3	Killa Saifullah	342814
4	Musakhail	167017



5	Loralai	244400
6	Duki	153000
7	Ziarat cum Harnai	257439
8	Sibi cum Lehri	251547
9	Barkhan	171556
10	Kohlu	214350
11	Dera Bugti	312603
12	Nasirabad-I	249492
13	Nasirabad-II	243117
14	Jaffarabad-I	252611
15	Jaffarabad-II	261202
16	Sohbat Pur	200538
17	Jhall Magsi	149225
18	Kachhi	237030
19	Pishin-I	241886
20	Pishin-II	244757
21	Pishin-III	249838
22	Killa Abdullah-I	182851
23	Killa Abdullah-II	167404
24	Killa Abdullah-III	407323
25	Quetta-I	237598
26	Quetta-II	267654
27	Quetta-III	223044
28	Quetta-IV	265628
29	Quetta-V	260187
30	Quetta VI	272179
31	Quetta VII	247459
32	Quetta VIII	278446
33	Quetta IX	223504
34	Nushki	178796
35	Chagai	226008
36	Mastung	266461
37	Shaheed Sikandarabad	200752
38	Kalat	211480
39	Khuzdar-I	273999
40	Khuzdar-II	271466
41	Khuzdar-III	256742
42	Washuk-cum-Kharan	332358
43	Panjgur	224111
44	Awaran-cum-Panjgur	214285
45	Kech-I	233765
46	Kech-II	241277
47	Kech-III	204916
48	Kech-IV	229158
49	Lasbela-I	282359
50	Lasbela-II	291933
51	Gawadar	263514



5. That reason to reproduce the details of para No.3 & 4 in this representation is to highlight many things unnatural, i.e. areas, population etc of some constituencies in the Province which are apparent on the face of record, as such can be noticed with a naked eye even without arguments.

6. That this commission in preliminary delimitation, suggested the constituency as (NA-268) consisting upon five Districts including Mastung, Kalat and Shaheed Sikandarabad which has no nexus with the remaining part of constituency, distance between the same is around 1100 Km to 1150 Kms, as such, it was never been the part in the past, so it may also not be in future also.

7. That in the circumstances, the petitioner being a registered voter of NA/ PB in question i.e. NA-268 & PB-35 Chagai is aggrieved/ interested to correct the wrong made in preliminary delimitation to file this representation cum objection on the following amongst other grounds:-

GROUNDS

- A. That till now the final census report has not been published, as such, the whole exercise appears to be premature.
- B. That there are no similarities while making the constituencies in respect of areas and population, hence on this count too it is bad.

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- C. That the maps of the constituencies prepared by this Commission have been supplied late, besides these are incorrect and do not tally with the maps of Survey department even it is not in consonance of Goggle maps, hence the commission may look into.
- D. That the criteria meant in the Election Act, 2017 and the rules have been ignored resulting miscarriage of justice.
- E. That the territories of all given districts of NA-268 are so long as touches to territorial areas of Kharan, Washuk, Khuzdar, Sibi, Quetta and Bolan can never be said compact areas. It never be said to provide facilities and means of communication and public convenience to ensure homogeneity in the constituency.
- F. That there is no economic, cultural, cognitive and social relationship between Nushki, Chagai AND Kalat, Mastung, Shaheed Sikandarabad aloud.
- G. That the principals as laid down in section 20 of the Elections Act, 2017 have been violated while notifying the preliminary delimitation, as such, not sustainable.
- H. That the existing boundaries of all districts are so far from each other as one contesting Election can

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never cover, couvades and campaign the whole dispersed area of said districts of NA-268 within the given period of election and almost 68000 Sq Km area is involved.

J. That the suggestion of the applicant is that the areas of Mastung, Kalat, and Shaheed Sikandarabad which have been included in the constituency in question be made a separate constituency, as these areas are not connected with the remaining part of the constituency in question, the distance between the parts of Constituency even the population can't be ignored beside the area which is almost equal to KPK Province hence this commission may look into.

K. That it is suggested that four districts i.e. Chagai, Nushki, Kharan and Washuk boundaries of which are connected could easily be made a constituency as these four districts qualify the requirement of section 20 of Election Act, 2017, in that case Mastung, Kalat and Shaheed Sikandarabad will be left which too are historically having an independent constituency and otherwise a compact unit in terms of the section mention above so that it be another constituency, here a question arises i.e. number of constituencies cannot be increased



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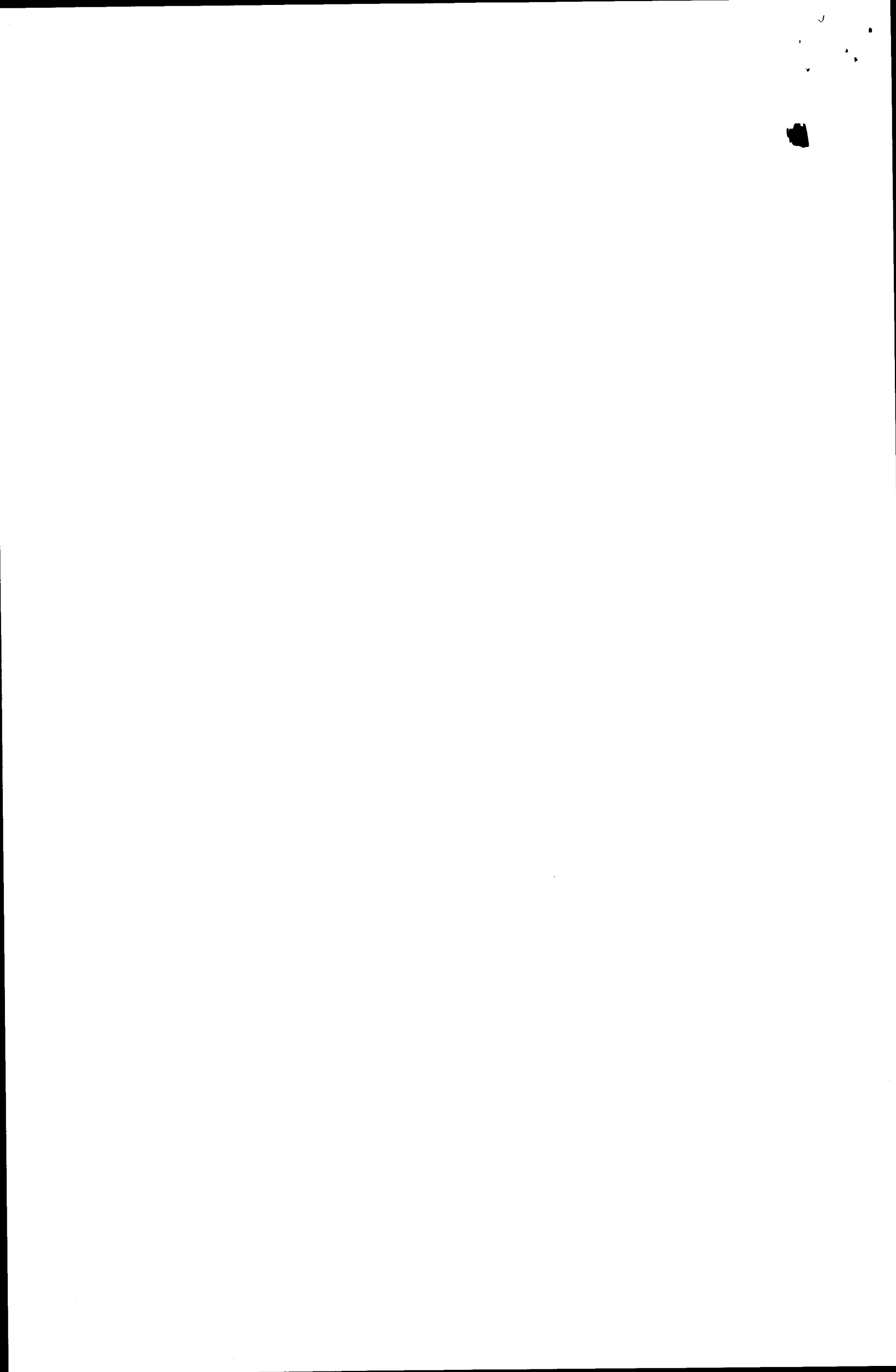
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without Constitutional amendment, to meet this situation another two constituencies i.e. NA-260 Nasirabad and NA-262 Kachi cum Jhal Magsi could be made one constituency as the population and areas of these two constituencies are not in consonance with the requirement of law and is less, the language, culture, mode of communication and distance in between two favours this suggestion, hence the commission may look into.

- L. That reasons to make the constituency would be the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituencies, hence required to be corrected.

It is, therefore, respectfully prayed that preliminary delimitation may be revised in the following manner:-

- i). The areas "Mastung, Kalat and Shaheed Sikandarabad" may be separated from NA-268 and a separate Constituency may be formed, whereas the areas Washuk and Kharan may be included in Chagai and Nushki NA-268.
- ii). Two constituencies i.e. NA-260 Nasirabad and NA-262 Kachi cum Jhal Magsi be consolidated and made one constituency as the applicant is



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requesting for separation of areas "Mastung, Kalat
and Shaheed Sikandarabad" from NA-268 and
forming a separate constituency for it whereas
declaring the areas Washuk, Kharan, Chagai and
Nushki to be the only areas of NA-268.

DATED: 02-04-2018

Q
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APPLICANT

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