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BEFORE THE SECRETARY, ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD.

SHAHJAHAN AZIZ

Son of Sardar Abdul Aziz Khan Umrani,
Resident of Lazo, Khuzdar.

9/02/04/2019
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REPRESENTATION

UNDER SECTION 21(3) OF THE ELECTION ACT,
2017 READ WITH RULE 12 OF THE ELECTION
RULES, 2017 REGARDING ALTERATIONS /
MODIFICATIONS IN THE PRELIMINARY LIST OF
CONSTITUENCY PB-40 KHUZDAR-II

Respectfully Sheweth;

1. That instant representation is being filed by Shahjahan Aziz (hereinafter referred as "Applicant"), a registered voter of Provincial Assembly Constituency PB-40 (Khuzdar-II) and in pursuance of Notification No.F8(3)/2018-Elec-I dated 05th March, 2018 the petitioner's constituency has been changed. The Applicant is duly competent to file the instant representation under the prevailing laws:
2. Through this representation, the applicant seeks to challenge the preliminary delimitation proposal published by the Election Commissioner of Pakistan (Hereinafter

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referred as "ECP") pertaining to the delimitation of the provincial assembly of District Khuzdar PB-40 (Khuzdar-II) (hereinafter referred as "preliminary proposal"), the map of the preliminary proposal which was provided by the ECP, as per the requirements of the ECP Laws is attached as Annexure A.

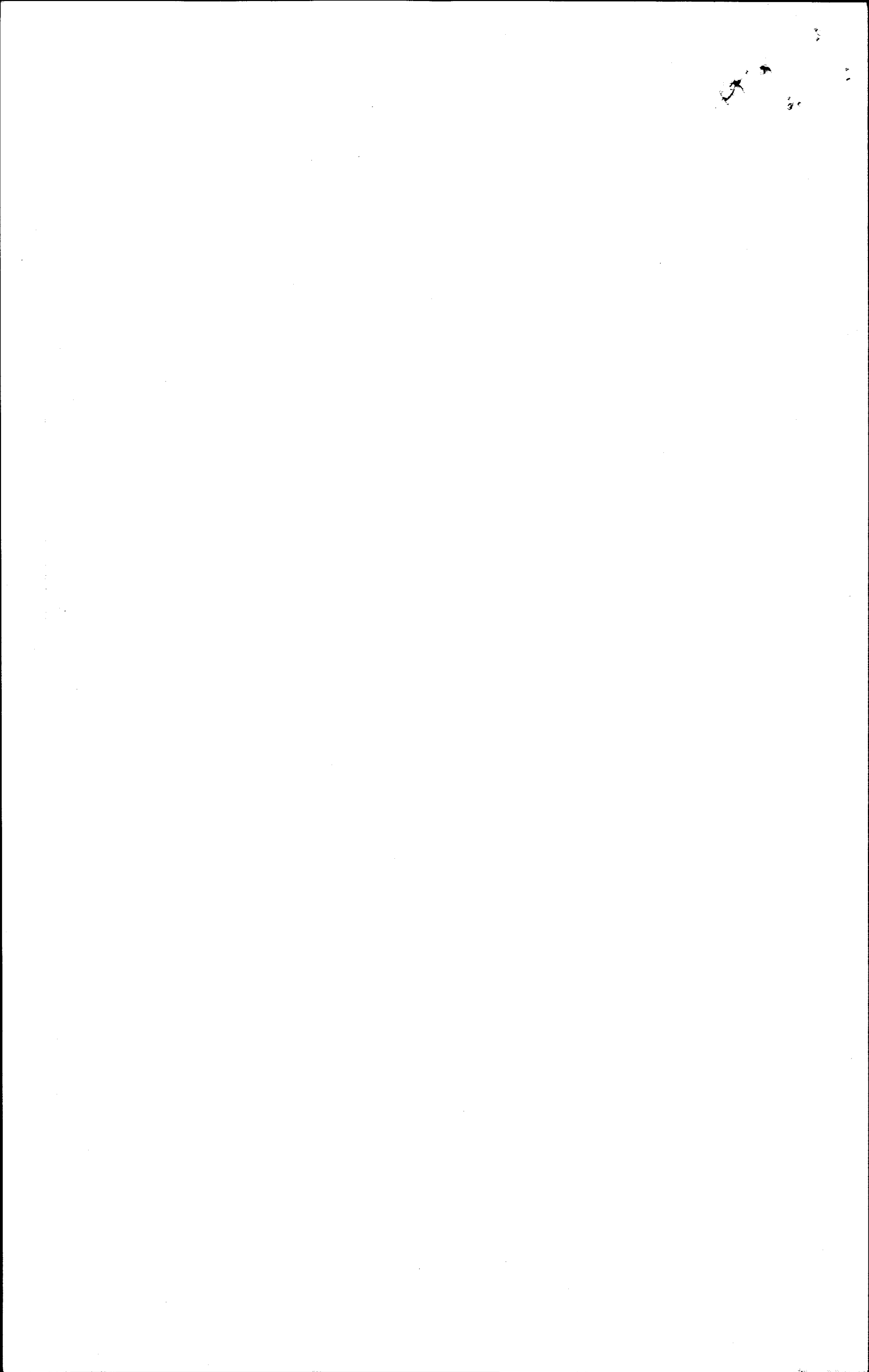
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10/2/04/2018

3. That, the petitioner is aggrieved by the new delimitation on the following ground:-

GROUND:

A. That, the new delimitation as published in preliminary report and preliminary list is against the provisions of section 20 of the Elections Act, 2017, reproduced for ready reference;

- 20 (1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the distribution of population in 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:

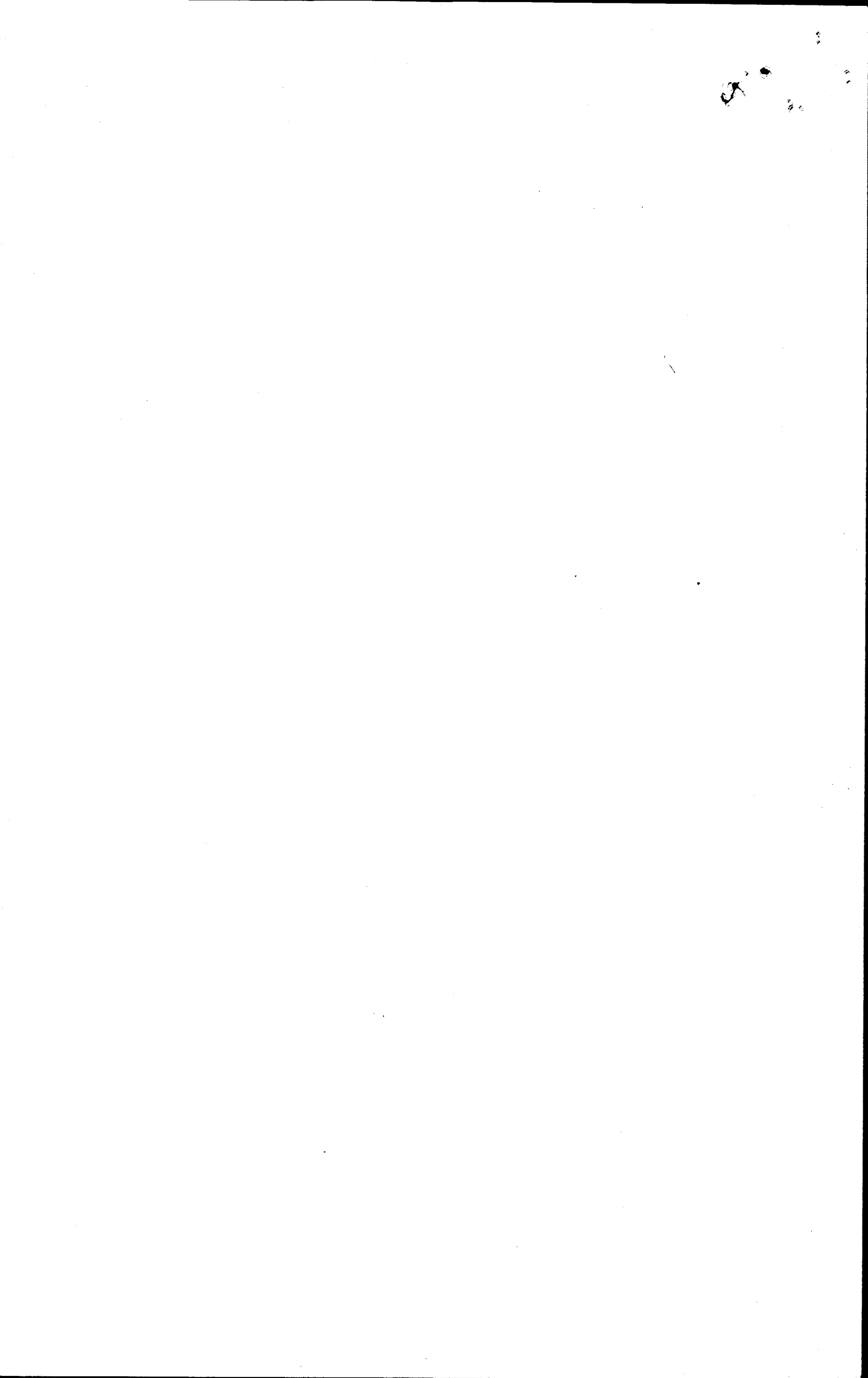
AD/24/20 B

The delimitation of Provincial Assembly PB-40 Khuzdar-II has been made in the following:-

		Population
a)	Khuzdar Municipal Corporation; and	182927
b)	Nal Tehsil excluding following Patwar Circles of Qanungo Halqa Saddar Nal:- i) Garak; and ii) Durnali of Khuzdar District	88539
	TOTAL:	271466

which needs to be reconsidered on following counts:-

- If population of this constituency would remain 271466 as proposed by the ECP then the same would result in eruption of unending tribal disputes because in these areas altogether different tribes are inhabiting, owing to which there is no homogeneity brings the matter within ambit of Section 20(1) of the Elections Act, 2017;



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- In this Constituency there is only one Municipality having single Municipal Circle and its own boundaries, owing to which there is no occasion to disturb it, but on the contrary the same has been broken without rhyme or reason;
- On the other hand in Tehsil Nal, other tribes are inhabiting so much so from the time of creation of Pakistan, the area of Nal Tehsil did remain in some other constituency that is to say in past Nal Tehsil had neither been part of Constituency of Khuzdar nor Nal Tehsil came in voter list of Khuzdar;
- In past inhabitants of both area are being represented properly by their respective representatives;

B. That, petitioner reserves the right to argue any other point at the time of arguments with kind leave of this Honorable Commission.



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PROPOSAL FOR CONSTITUTION OF THE
CONSTITUENCY PB-40 KHUZDAR-II

Allocating PB-40 Khuzdar-II exclusively for Khuzdar Municipal corporation with population of 182927 would create no hindrance in providing opportunity for representing the area in proper manner as done by ECP in the following Provincial Constituencies of Balochistan:-

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S.#	Constituency	Population
1	PB-1 Sherani	153116
2	PB-4 Musa Khail	167017
3	PB-6 Dukki	153000
4	PB-9 Barkhan	171556
5	PB-17 Jhal Magsi	149225
6	PB-22 Killa Abdullah-I	182851
7	PB-23 Killa Abdullah-II	167404
8	PB-34 Nushki	178796

The constituency PB-40 Khuzdar-II will be constituted in the manner as mentioned above.

P R A Y E R:

It is, therefore, respectfully prayed that in view of submissions made herein-above, it is humbly prayed that preliminary delimitation of PB-40 Khuzdar-II be re-notified as per the proposed map provided by the petitioner. Any other relief which this Hon'ble commission may deem fit and proper in the circumstances of the case is also solicited.

Quetta.

Dated: ___-04-2018

PETITIONER

Shahjahan Aziz

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