



**BEFORE THE SECRETARY ELECTION COMMISSION OF
PAKISTAN ISLAMABAD**

**REPRESENTATION WITH REGARD TO THE DELIMITATION
FOR CONSTITUENCIES FOR THE PROVINCIAL ASSEMBLY
FOR DISTRICT PANJGUR, , UNDER SECTION 3, SECTION 21
OF THE ELECTION ACT, 2017 READ WITH RULE 12 OF THE
ELECTION RULES, 2017.**

The petitioner / objector Haji Muhammad Islam, Resident of Municipal Committee Tasp, Panjgur respectfully submitted as under:-

1. That the petitioner is a bonafide resident of District Panjgur, law abiding citizen of Pakistan and is a registered voter with the Serial No.324.
2. That the Election Commission of Pakistan has issued a notification dated 05.03.2018 S.No.318 in which the list of delimitation for constituencies of Provincial Assembly and National Assembly has been published the district Panjgur with the population of 228414 according to the census of 1998 has been elected for National Assembly for two Provincial Assembly seats or National Assembly seat comprising of District Kharan, Washak and Panjgur.
3. That the district Panjgur is most affected due to the insurgency of banded organization from 2006 till now. Three Sub Tehsil i.e. Sub Tehsil Paroon, Sub Tehsil Gichk, and Sub Tehsil Gwargo, still no go areas with the huge population during the last census has been held the Hon'ble election commission of Pakistan and 2017 after laps of 19 years.

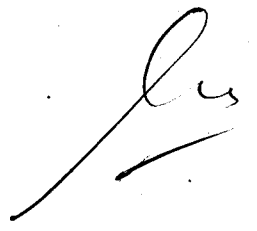


4. That due to insurgency and security threats of banned organization of census teams the said team were unable to proceed to the area i.e. above mentioned Sub Tehsil which have nomadic and scattered population and the hard and hill areas. The teams were unable to reach to each and every door to count the houses and population due to security threat. It is write to mention here that 95% of these Sub Tehsils and 45% of Tehsil/City area of District Panjgur were not counted during the census process in this respect the concerned Union Council and District members submitted their affidavit to the Hon'ble Election Commission of Pakistan through TCS and express their reservations in respect of not counting huge population of these areas.

- i. That according to the NADRA record 295000 applications for registration has been submitted, in District Panjgur.
- ii. As per the NADRA figures the census record is to less as compared to the registered peoples of District Panjgur.

5. That the delimitation which has been done by the Hon'ble Election Commission of through notification dated 05.03.2018 is totally against the ground realities and geographical borders of the area three Sub Tehsils, Sub Tehsil Paroom Sub Tehsil Gichk and Sub Tehsil Gwargo alongwith two union Counsels, these above.

- i) Union Counsel Kalag, which is situated alongwith Irani borders distance is from threes Union Counsels to Awaran is more than thousand KM.



- ii) Union Counsel Sordo which is attached with the office of Deputy Commissioner Panjgur separated from District Panjgur which is more than thousands KM far from Awaran District.

The delimitation of these constituencies have been done maliciously, hence deputizing the interest of petitioner and general public of district Panjgur without any access.

6. That the delimitation is also Plotted / violated to the settled principle has give in the guidelines issued by Election Commission of Pakistan to take all possible cares to keep and take administrative boundaries of Tehsil and Qunungo Halqas unless it is necessary to do so to remove the glaring disparity of population amongst various constituencies of the same district. Qanungo Halqa have been demolished and distributed to different constituencies to suit the interest of specific prospective candidates.

7. That the PB-1 Sherani, Population 153, 116, PB-17, Jhal Magsi 149225, PG-14, Musa Khail 167, 017, PB-6 Dukki, 153,000, these above mentioned district population are less than 150000 or in between these districts, there and seats and district boundaries were to changed and delimitation process which is violation of election rules and formula which has been determined the population of district Panjgur as Thick population is severely effected by law and order situation, the population were not counted during the due process of census 2017. The registered population of the district Panjgur is more than 2,95,000 according to



NADRA registration record of the district but unfortunately due to the law and order situation the population properly not counted which is violation of the basic rights of the people according to the constitution of Islamic Republic of Pakistan, 1973.

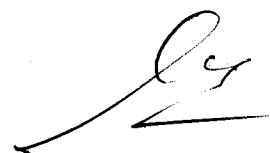
8. That the district Panjgur was previously separated into two constituencies naturally divided by Rakhshan river from north to south i.e. (A) PB-42 Panjgur (I) Chitkan Town Committee (B) the following Union Council according to 1998 census Panjgur Tehsil and District (i) Union Council Gichk (ii) Union Council Sordoo (iii) Union Council Essai (iv) Union Council (Keel Kore) (v) Union Council Dasht Shahbar and (vi) Union Council Paroom PB-43 Panjgur (II) with the population of 228414 with the old limitation was perfect will not just further complication of governance of the district and did not result in the tribal and geographical complication and uncertainty in the district.
9. That unfortunately in the recent incomplete census process in the district due to law and order situation lump-sum population counted was 316385 with the increase of 70000, 80000 but unfortunately people of the area deprived for representative.
10. That while formulating constituencies the members laid down for the census 2017, the election Act 2017 have not been followed at all. Member of district and delimitation does not appear who have been processed by the delimitation officer and lawfully and bonafide exercise of the power and duties assigned.



11. That the petitioner has processed to keep the delimitation of the constituencies for provincial assembly for district Panjgur unchanged as done in 2002. Copy of Case No.02/2002 Panjgur dated 31.05.2002 by Mr. Justice Ahmed Lashari, Member Election Commission of Pakistan, Balochistan, Quetta.

12. That petitioner has proposed to keep the delimitation of constituencies for the provincial assembly for district Panjgur, District unchanged as done 2002 for cons and restoration of old i.e. constituencies 1) PB-42 Panjgur-I (i) Union Council Gichk (ii) Union Council Sordoo (iii) Union Council Essai (iv) Union Council Keel Kore (v) Union Council Dasht Shahbaz and (vi) Union Paroom (2) PB-43 Panjgur-II (i) Union Council Washbood, (ii) Union Council Gramkon, (iii) Union Council Khudabadan East, (iv) Union Council Khudabadan West, (v) Sarikalat Tasp, (vi) Tasp, (vi) Kalag. Copies of Map of respective area is attached herewith.

North Halqa Panjgur			South Halqa Panjgur		
S.#	Union Council	Population	S.#	Union Council	Population
1.	Washbood	21620	1.	Sordo	12848
2.	Gramkan	13095	2.	Chitkan	21297
3.	Khudabadan East	17161	3.	Issai	15754
4.	Khudabadan West	21756	4.	Bonistan	7491
5.	Sariqlat Tasp East	11670	5.	Kohbun	9838
6.	Tasp West	14219	6.	Paroom	10613
7.	Kalag	12724	7.	Dasht Shahbaz	8162
	Total	112245/-	8.	Keel Koor	15367
			9.	Gichk	15699
				Total	116,169/-



13. That the new proposal for the constituencies PB-42 & 43 are as under:-

PB-42 Panjgur-I Cum Kech (Makran Division)

i.	Union Council Sardo	23704
ii.	Union Council Chitkan	44434
iii.	Union Council Bonistan	11653
iv.	Tehsil Gawargo	9383
v.	Keel Kore Sub Tehsil	6757
vi.	Tehsil Paroom	22892
vii.	Gichk Tehsil	16501
viii.	Tehsil Hoshab	<u>51446</u>
		186770

PB-43 Panjgur-II (Makran Division)

i.	Union Council Washbood	37769
ii.	Union Council Gramkan	21224
iii.	Union Council Khudabadan East	24971
iv.	Union Council Khudabadan West	22236
v.	Union Council Tasp East	35890
vi.	Union Council Tasp West	8531
vii.	Union Council Kalag	13037
viii.	Union Council Issai	<u>17583</u>
		181061

That the second proposal for the constituencies PB-42 & 43 as per International clock wise from North to South are as under:-

PB-43 Panjgur Cum Washauk

i.	Tehsil Bessima	40420
ii.	Sub Tehsil Naag	34269
iii.	U.C Washbood	37769
iv.	U.C Gramkan	21224
v.	U.C Khudabadan East	24791
vi.	U.C Khudabadan West	22236
vii.	Tasp East	<u>35890</u>

Total: 216779



PB-42/44 Proper Panjgur

i.	U.C. Tasp West	8531
ii.	U.C. Kalag	13037
iii.	U.C. Issai	17583
iv.	U.C. Bonistan	11653
v.	U.C. Chitkan	44434
vi.	U.C. Sardo	23704
vii.	Teshil Gichk	16561
viii.	Tehsil Gawargo	9383
ix.	Sub Tehsil Keelkor	6757
x.	Tehsil Paroom	<u>22892</u>
	Total	174475

14. That the constituencies Musa Khel cum sherani with two provincial seats and with the population of 153116 addition 167076 = 320192 be declared as a one constituencies the addition seat should be included to washauk cum awaran. The map of PB-04 is attached and the population of Washuk is - 1476206

Awaran is - 122011

Total = **298217**

15. That PB Awaran District as per the geographical, social, political and economic close relation with the District Lasbaila as per the old position according to the delimitation of 2002-03 be included for the easy access of peoples of Awaran to reduce their difficulties.

16. Enclosure Map for New proposals (2-Page) previous delimitation letter. Draft list of constituencies for the Province Balochistan.

PRAYER:

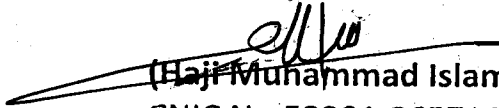
It is therefore requested that new proposal as mentioned in para No.13 for PB-42 & 43 may kindly be approved.



It is further prayed that the old delimitation area wise may kindly be approved as mentioned in Para-12.

It is further prayed that the petition may kindly be accepted and accordingly directed the concerned to amend / change the delimitation as per law in the interest of justice.

Any other relief which this Hon'ble Court deem fit may proper be awarded.



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Dated: ~~2-4-2018~~