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

**IN THE MATTER OF DELIMITATION OF THE CONSTITUENCY PS PB 43 AND PB 44
PROPOSED IN THE PRELIMINARY REPORT.**

Ali Ahmed S/O Mohammad Anwar
adult Muslim,
R/O Post Office Panjgur,
Sordow, Tehsil
District Panjgur.....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 PB-44 Awaran cum Panjgur has been carved out of the constituency earlier known as PB-42.
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 Panjgur has population of 316,387/-. Whereas as per NADRA record, almost three lac (300,000) national identity cards have been issued to the residents of District Panjgur. So it delineates

the fact that District Panjgur has greater population, which is estimated to be more than one million (1000, 000) as per the afore-supposition.

5. That the proper census could not be held in the District Panjgur due to law and order situation. Moreover, District Panjgur is a backward District and bordering region falling adjacent to the borders of Iran.
6. That at the time of census, the law and order situation of District was not stable due to miscreant activities and threats. That the government officials specially the teachers involved in the process of census were threatened with dire consequences including life threats, henceforth, in such circumstances proper census could not be held in the entire District specially in the sub-tehsil of i) Parome ii) Gichk iii) Gowargo.
7. That a havoc has been played while delimiting District Panjgur. The historical presence of Sordow and Kallag has been done away with by including it in PB-44 (old PB-42) Panjgur-cum-Awaran.
8. That astonishingly, District Panjgur and District Awaran are devoid of any land route or road connection. Which makes it impossible for the inhabitants of UC-Sordow and UC-Kallag to move to District Awaran and cast their vote. As District Awaran is at a distance of 1,023/- Killo Meter from District Panjgur. The locals of UC-Sordow and UC-kallag have to travel to District Karachi at the first instance by traveling distance of more than 700 km and thereafter by travelling more than 323 towards District Awaran. So it is impossible for the inhabitants of afore-said union councils to cast their precious votes while electing their representatives and would be like-wise difficult for them to do away with their national duty. In the same context it would be near to impossible for the candidates to organize their canvassing in this volatile region.

9. That it is pertinent to mention here that during the national election held in the year 2013, a member elected from the District awaran had secured only 500/- votes due to the ongoing law and order situation.
10. That the UC- Sordow and UC-kallag are poverty stricken, impoverished, farflung, remote and backward UCs of the District Panjgur and their inclusion in District Awaran PB-44 would be injustice with the locals of the mentioned areas.
11. That apart from the above, UC-Sordow is situated adjacent to UC-Chatkan which is the main District center of District Panjgur. As both the Districts are extremely close and adjacent to each other. The distance between the two union councils is near to insignificant. Therefore, inclusion of UC-Sordow and UC-Kallag in the District Awaran would neither be geographically sound nor as per its physical features as it would deprive them from facilities of communication. Instead of these two UCs, UC-Washbood having same population can be included in District Awaran.
12. That the all the important administrative offices, education institutions such as Girls degree college, Cadet College, judicial complex, DPO office, international airport are situated in the union council Sordow. However despite of these, the said UC has been included in District Awaran PB-44 and District Panjgur has been deprived of all these facilities. Therefore, it is in the best interest and welfare of the people of District Panjgur that the said UC be made part of PB-43 instead of PB-44.
13. That the preliminary proposals 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 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.

14. 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 grounds.

SUGGESTIONS/PROPOSALS:

- A. That the impugned delimitations suffers from stacking, packing and cracking which fact find support from the fact that UC-Sordow and UC-Kallag have been included in PB-44 Awaran-cum-Panjgur, which has no road and communication linkage with District Awaran. To access District Awaran, a distance of 1,023 km via Karachi is required to be travelled. Similarly the main head offices of the District Panjgur situated in Sordow UCs such as DC office, DPO office, Girls degree college, Judicial complex, cadet college, international airport would shift to PB-44 and would amount to be part of District Awaran during the electioneering. Thus would cause great inconvenience for the locals of District Panjgur. Therefore, being extremely adjacent to UC-Chatkan, the center of District Panjgur (PB-43). Henceforth, UC-Sordow, UC-Chatkan, UC-Issai, UC-Bonistan, UC-Kallag, UC-Garmakan, UC-Khudabadan east, UC-Khudabadan West, UC-Tasp West, UC-Tasp East be made part of a single constituency. The population of the said constituency would be 220528.
- B. These all UCs are connected and adjacent to each other. These are important UCs of Panjgur city and the distance between them is insignificant.
- C. The original status of two seats PB-42 and PB-43 be restored in its historical position in order to enable the locals to have effective representation in the provincial assembly.

- D. UC-Washbood, UC-Naag and UC-Basima and District Washuk be made one constituency. Which geographically are harmonized and synchronized on similar single route. The inter-distance of the afore-said constituency would be in the range of 200 km. This land route is further facilitated by the CPEC road project and the inclusion of the said UCs in District Washuk would be a sigh of relief for general public of District Panjgur to avail the facility of CPEC. Therefore, this revamp of the constituency merits consideration.
- E. To further facilitate the locals of the area, Sub-Tehsil Parome, Gichk, Goworgo and UC-Washbood be made part of Awaran in order to form a separate constituency.
- F. finally the assertion in simple mode would be that UC-Washbood has population of 37,769/- whereas, population of UC-Sordow and UC-Kallag is 36741/-. Therefore, keeping in view the contentions raised in preliminary paras, UC-Washbood be made part of PB-44, Awaran-cum-Panjgur instead of UC-Sordow and UC-kallag. Whereas, UC-Sordow and UC-Kallag be reversed to its original position and included in PB-43 Panjgur.
- G. 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:

Ali Ahmed S/O Mohammad Anwar

R/O Post Office Panjgur,

Sordow, Tehsil, District Panjgur

BEFORE ELECTION COMMISSIONER OF PAKISTAN
THROUGH THE SECRETARY ELECTION COMMISSION ISLAMABAD

REPRESENTATION NO. 2018
(Against Draft Delimitation of Constituencies PB-43 And PB-44 Proposed In The Preliminary Report.).

Ali Ahmed S/O Mohammad Anwar, R/O Post Office Panjgur, Sordow, Tehsil District Panjgur..... PETITIONER

REPRESENTATION FORM MEMORANDUM UNDER RULE 12 OF ELECTION RULES 2017

AFFIDAVIT

I, Ali Ahmed S/O Mohammad Anwar, R/O Post Office Panjgur, UC-Sordow, Tehsil District Panjgur, do hereby solemnly affirm and state on oath that the contents of the Representation are true to the best of our knowledge and Nothing relevant has been conceal there from.

PETITIONER