

✓  
1-4  
10/09/2018

**BEFORE THE HONORABLE ELECTION COMMISSION**  
**OF PAKISTAN THROUGH SECRETARY ELECTION**  
**COMMISSION OF PAKISTAN**

Representation/Objection Petition No. /2018

1) Muhammad Ismail Buledi Son of Molvi Muhammad Umer, Resident of Village  
Buleda , Tehsil Buleda District Ketch (0333-5164666)

Petitioner

Versus

The Delimitation Committee

Respondent

**REPRESENTATION for delimitation of the Constituencies of**  
**District Kech, specially PB 45 under Section 21 of Election Act 2017**  
**read with Election Rule 12 of Election Rules 2017 with all enabling**  
**provisions against the delimitation by the respondents**

Respectfully sheweth,

- 1) That the petitioner is registered voter with serial No 882 Block code No 481330204 on the proposed constituency of PB 45 and through this instant representation submits his objection in the delimitation of PB 45.
- 2) That the petitioner is notable and law-abiding citizens of Pakistan and the petitioner held prominent political positions and entrusted by the people of constituency.

3) That Election Commission of Pakistan has published notification No. F-8(3)/2018-Elc-1 dated 05-03-2018 through official Gazette for the information of public, preliminary report and the list of constituencies of National Assembly and Provincial Assembly.

4) That the District Kech has been allocated 4 Provincial Assembly seats.

5) That the principle of delimitation has been enumerated in section 20 of election Act 2017, which reads as under;

***"20 Principle of delimitation***

*(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.*

*(2) For the purpose of delimiting constituencies for the general seats of the National Assembly for the Tribal Areas two or more separate areas may be grouped into one constituency.*

*(3) As far as possible, variation in population of constituencies of an Assembly or a local government shall not ordinarily exceed ten percent.*

*(4) If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, the Commission shall record reasons thereof in the delimitation order.*

6) That we can easily identify that principles of delimitation which law provides to be compiled with, respected and implemented in letter and spirit while delimiting the electoral constituencies so voters could be benefited and that principles are;

a) Distribution of equal population

2

*M. J. Khan*  
05/03/2018

b) Geographical Compactness

c) Existing Boundaries of existing unites

d) Communication facilities

e) Physical features

f) Public convenience and

g) Such other cognate features which ensure homogeneity.

7) The procedure of delimiting the constituencies has been provided under Sub-rules 3,4 and 5 of Rule 10 of Election Rules, 2017, reproduced as under;

*(3) In preparing draft proposals for delimitation of constituencies, the Delimitation Committee shall follow the principles of delimitation as laid down in section 20, procedure given in this Chapter and the guidelines provided by the Commission from time to time.*

*(4) The constituency for an Assembly shall not ordinarily extend to more than one district except in exceptional circumstances for reasons to be recorded by the Delimitation Committee:*

*Provided that a Patwar Circle or, as the case may be, a Tapedar Circle shall be the basic unit for delimitation and it shall not be broken under any circumstances: Provided further that in case of urban areas census circle shall not be broken under any circumstances.*

*(5) As far as possible, the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or, as the case may be, the agency and then proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an Assembly shall remain as close as may be practicable to the quota:*

*M 04/07/2018*

*B*

4

*Provided that the quota under this sub-rule shall be determined by dividing total population of the district or the agency with number of seats allocated to that district or agency:*

*Provided further that the variation in population between two or more constituencies shall not ordinarily exceed ten percent and the Delimitation Committee shall record reasons if, in exceptional circumstances, the variation has to exceed the limit.*

- 8) That petitioner has gone through detail of proposed constituencies of Kech and has seen demarcation of boundaries of all constituencies of the District on the official map of district obtained from office of Election Commission on payment of prescribed payment.
- 9) That anomalies in the delimitation are floating on the surface of official map released by Election Commission of Pakistan.
- 10) That the proposed delimitation of PB 45 includes Union Council Pidrak and there is no homogeneity in proposed PB 45 of Buleda.
- 11) That Union council Pidrak of proposed PB 45 is only accessible through a non-metallic road to the rest of the constituency. There is no Metallic or well paved road connecting the union council Pidrak to other areas of the constituency. It is only accessible through hill track and other possible way to reach Union Council Pidrak is via area of Constituency of Turbat it needs more than 15 hour travelling to connect union council Pidrak to constituency Head Quarter of Buleda hence the facilities of communication are poor or non-existent connecting Union Council Pidrak to rest of proposed constituency and it is worth to mention here that Union Council Pidrak historically in all past elections was part of constituency of Turbat.
- 8/12/2018

Handwritten signature and date: 07/01/2018

12) That the union council Pidrak has no cultural ties and communications with Buleda all trade and cultural ties of Union Council Pidrak are with Turbat city not with Tehsil Head Quarter Buleda so it is needless to mention that this will have significant bearing to election campaigns, accessibility and convenience of voters.

13) That aforementioned instances are prohibited under delimitation principle and falls squarely within the preview of "other cogent factors to ensure the homogeneity in creation of constituency" as envisaged in section 20 of Election Act 2017.

14) That keeping in view the principles as enriched under Election Act 2017 read with Rule 10 of Election Rules 2017, a proposal/suggestion has been prepared for consideration of Delimitation Committee. The proposal suggestion has strictly been framed in compliance of principles of delimitation.

### Proposed Delimitation

#### Proposed/ Suggested delimitation of Abbottabad District.

Name of Constituency	Extent of Constituency	Population
PB 45, Kech 1	As Shown on the proposed map	245,426
PB 46, Kech II	As shown on the proposed map	229,426
PB 47, Kech III	As shown on the proposed map	204,916
PB 47, Kech IV	As shown on the Map	229158

11/09/2018

That the Above proposal has been supported with map and constituencies demarcated on map are geographically compact and populations has been distributed almost equally. Whereas all the constituencies ensure complete homogeneity and facility of people. Communication Network has dully been kept in view while carving out all the constituencies of Abbottabad district.

**Prayer**

In the view of anomalies pointed out in above paragraphs petitioners humbly request that delimitation of District Kech specially PB 45 may be reviewed and recrafted on the basic principles under section 20 of Election Act 2017. As directed by Commission an alternative proposal for the delimitation of whole District is submitted for the kind consideration of the Commission. Any other better relief, deemed just and proper, regarding the delimitation of constituencies may also be granted.

Petitioner

Muhammad Ismail Buledi

Dated: 03 April 2018

Through Counsel

Hasib H. Baig

Advocate (03455448899)

**Verification:**

That the contents of the instant Representation/Objection Petition are true and correct to the best of my knowledge and belief and nothing has been concealed from this honorable forum.

Petitioner