

Jee
1

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

**IN THE MATTER OF DELIMITATION OF THE CONSTITUENCY PB 7
ZIARAT-CUM-HARNAI PROPOSED IN THE PRELIMINARY REPORT.**

IKRAM ULLAH S/O TAJ MOHAMMAD

adult Muslim,

R/o Saddar Harnai,

Tehsil

and

District

Harnai

.....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-7 Ziarat-cum-Harnai has been carved out of the constituency earlier known as PB-22

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 Harnai has population of 97,017/-. Whereas as per the census in the year 1998, the total population of District Harnai was 76,652/-. After a span of 20 years, the population of District Harnai has been increased to 20365/-, which is an anomaly in itself defying common sense. So it delineates the fact that District Harnai has greater population, which is estimated to be more than five lac (5,00, 000) as per the afore-supposition.
5. That the proper census could not be held in the District Harnai due to law and order situation. Moreover, District Harnai is a backward District deprived of basic facilities.
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.

7. That a havoc has been played while delimiting District Harnai. The historical presence of District Harnai has been done away with by including it in PB-7 (old PB-22) Ziarat-cum-Harani.
8. That astonishingly, the census was held in extremely hot weather whereinforth it is common practice in District Harnai, that people in hot weather migrate towards District Quetta and District Ziarat, culminating into the fact that most of the population was not taken into consideration while conducting census in the region.
9. That according to the polio vaccination data, 24,000 children were given polio drops having age of 1 to 5 years thus, revealing the fact that with 24,000 kids, the population cannot be in the domain of 97,000/-. Hence, the estimated population of 5 lac in District Harani ordains true picture of the area.
10. That by inclusion/merger of District Harnai into District Ziarat has disrupted the historical status of the district which is rich with minerals, natural resources and agricultural economy. The merger of District Harnai into District Ziarat would amount to vitiate the status of Harnai as a District of the province, thus would result in the infringement of the rights of general public of the locality.
11. That District Harnai is poverty stricken, impoverished, farflung, remote and backward District of Balochistan and its inclusion in

District Ziarat PB-7 would be injustice with the locals of the mentioned areas.

12. That apart from the above, the inclusion of District Harnai in District Ziarat would neither be geographically sound nor as per its physical features as it would deprive it from facilities of communication.
13. That the preliminary proposal 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 amongst other grounds.

SUGGESTIONS/PROPOSALS:

- A. That the impugned delimitations suffers from stacking, packing and cracking which fact find support from the fact that a complete district (i.e. Harnai) has been included in PB-7 Harnai-cum-Ziarat. Thus it would cause great inconvenience for the locals of District Harnai. Therefore, at the first instance, it is proposed that the original status of District Harnai PB-22 be restored in its historical position in order to enable the locals to have effective representation in the provincial assembly.
- B. District Harnai be made part of the District Ziarat PB-7, while Tehsil Sanjavi (having population of 92,561) be included in District Duki PB-6 having population of 153000.
- C. Khanozai (Gwal, Khani, Olgi, Zaurkanrh (having population 10399), Murgha PC (Baghdad, Churmain, Dilsora, Herchand, Kadin, Mulazai, Murgha, Narin (Pani Shakha, Shudan, Takhoi Takoo Toraghabergi, Yousaf Kechh, Zanki (having population 39,939) be made part of District Ziarat PB-7, whereas, UC Kachh PC (having population 17,688), UC Rigorah (having population 3,203), POI PC (having population 24,437), UC Wam (haing population 1483), UC Tangi (having population 1483) be made part of District Harnai in order to either restore

the previous constituency PB-22 or form a new constituency in the best interests and welfare of inhabitants of District Harnai.

D. Ziarat (Kech, Zaranda, Sanjavi Bigorha, Sanjavi Pai), be made part of District Harnai.

E. 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

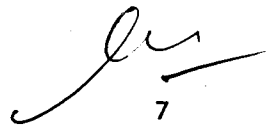
**Ikram Ullah S/O Taj
Mohammad**

adult Muslim,

R/o Saddar,

Tehsil and District Harnai

0333-7900339.


7

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.)

**Ikram Ullah S/O Taj Mohammad, R/O Saddar, Tehsil
and District Harnai..... PETITIONER**

REPRESENTATION FORM MEMORANDUM UNDER RULE 12 OF
ELECTION RULES 2017

AFFIDAVIT

I, Ikram Ullah S/O Taj Mohammad, R/O Saddar, Tehsil and District Harnai, 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 concealed therefrom.

