

2/04/2018
Through Secretary

IN THE ELECTION COMMISSION OF PAKISTAN
CONSTITUTION AVENUE, ISLAMABAD

Representation No. _____/2018

SUBJECT:- REPRESENTATION/ OBJECTIONS UNDER SECTION 21 OF THE ELECTIONS ACT, 2017 R/W RULE 12 OF ELECTION RULES, 2017 FURTHER R/W ARTICLE 218 (3) OF THE CONSTITUTION OF ISLAMIC REPUBLIC OF PAKISTAN 1973.

The appellant most respectfully submits as

under:-

1. That the appellant is a law abiding, faithful and patriot citizen of Pakistan, he is permanent resident and registered voter of Union Council Habibzai, Tehsil Killa Abdullah, District Killa Abdullah Balochistan, presently part of PB-22 and NA- 264. It is relevant to mention here that the applicant is a political and social worker and residents of the area from the time of their forefathers, as such, interested in the well being of the inhabitants of the area, guaranteed by the law, rules and Constitution of Islamic Republic of Pakistan.

2. That Balochistan is the largest province of Pakistan, the area of Province comprises upon 347190 Square Kilometer while the population is 12344739. The Province of Balochistan has been allocated sixteen general seats for National Assembly, whereas three are meant for women. Similarly in Provincial Assembly fifty one seats of Provincial Assembly's candidates are to be elected through General Elections while eleven and three seats are reserved for women and minorities.

3. That in the recent delimitation, while forming the constituencies of Provincial Assembly, incorrect data has been incorporated, the constituencies have been formed ignoring the population, tribal/ ground reality and geographical boundaries, hence required to be corrected, detail whereof is given below:-

- i). PB-22 has been formed with the combination of (a) Patwar Circle Mezai and (b) Patwar Circle Killa Abdullah meaning thereby Tehsil

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Killa Abdullah is attached with Tehsil Dobandi's Patwar Circles Farakhi and Aghbarg, which is unjustified in pursuance of tribal/ ground reality and geographical boundaries as the areas are far away from each other.

- ii). (PB-23) The Patwar Circles of Gulistan i.e. Segi and Gulistan and Patwar Circle Zara Band of Tehsil Chaman have been attached with Tehsil Dobandi's Patwar Circle Jalga, which is unjustified geographically keeping in view the ground realities and distance.
- iii). (PB-24) Chaman has been formed upon the population of 407323 which is unjustified keeping view the population of the area.

4. That in the circumstances following suggestions/ recommendations are made:-

1st SUGGESTION: -

- i). (PB-22) Constituency may be constituted with the combination of Patwar Circle Mezai, Patwar Circle Segai and Patwar Circle Gulistan, the total population of these three Patwar Circles is 185760 (70588, 58080 and 57092 respectively) (registered voters are 21397, 18217, 13522=53126), geographically they are attached with each other, 70 % of people belong to Kakar tribe and boundaries of these Patwar circle are one.
- ii). (PB-23) Tehsil's Dobandi's is consisting upon three Patwar Circles i.e. (i) Ghabargi (population is 38198, registered voters are 12699), (ii) Prakhi (population is 11371, registered voters are 4070), (iii). Jagida (Population is 12154, registered voters are 6438), therefore, the same may be attached

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with Patwar Circle Killa Abdullah (population is 62694, registered voters are 21895) and Patwar Circle Zara Band (population is 26445, registered voters are 5637), the total population of all the above areas is coming to 150862, whereas the registered voters are 50739, hence the constituency consisting upon above areas is required to be constituted.

- iii). (PB-24) Tehsil Chaman's population is much, unnatural increase of 200% has been made in the population, therefore, it may be declared as separate constituency and constituency may be formed on the existing population of Chaman which is 407323, whereas registered voters are 83554

2ND SUGGESTION

- i). (PB-22) A Constituency may be constituted with Patwar Circle Mezai, Patwar Circle Killa Abdullah, Patwar Circle Gulistan and Patwar Circle Segai, population of which is 248454 and registered voters are 75031.
- ii). (PB-23) (a) Patwar Circle Zara Band Tehsil Chaman, (b) Chaman Municipal Area Tehsil Chaman (c) Patwar Circles Ghabargi, Farakhi and Jagida of Tehsil Dobandi, Total population of which comes to 211359 registered voters are 65471, therefore, a constituency may be formed/ constituted upon these areas.
- iii). (PB-24) Patwar Circle Saddar, Tehsil Chaman, population of which is 284132, registered voters are 46927, therefore, a separate constituency comprising upon the said area may be constituted.

3rd SUGGESTION

Previous position of all the three constituencies including the areas i.e. (Previous PB-12 now PB-