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BEFORE THE SECRETARY, ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD.

NASRULLAH KHAN BARRECH

Son of Haji Mehrullah Khan Barrech,
Resident of Takhtani Bypass,
Quetta (Balochistan)
CNIC # 54400-0563171-5
Cell # 0333-7808875

REPRESENTATION

**UNDER SECTION 21(3) OF THE ELECTION
ACT, 2017 READ WITH RULE 12 OF THE
ELECTION RULES, 2017 REGARDING
ALTERATIONS / MODIFICATIONS IN THE
PRELIMINARY LIST OF CONSTITUENCY
PB-33 QUETTA-IX**

Respectfully Sheweth;

1. That, the petitioner is registered voter in Constituency PB-33 Quetta-IX with Census Block Code # 451010433 and the name of the petitioner is at serial No.107, Takhtani Jadeed, District Quetta and in pursuance of Notification No.F8(3)/2018-Elec-I dated 05th March, 2018 the petitioner's constituency has been changed.
2. That, the petitioner is aggrieved by the new delimitation on the following inter-alia grounds:-

GROUND S:

- A. That, the new delimitation as published in preliminary report and preliminary list is against the provisions of section 20 of the Election Act, 2017 read with rule 10(4) & (5) of the Election Rules, 2017 and it is also observed that the preliminary above constituency has been constituted against the above provision of Rules and Act of 2017 because it was the principle laid down under the rules and act, the constituency will be started from northern side of the District as clock-wise and also zigzag manner keeping in view these principles have not been applied, which is against the Rules and Act of 2017.
- B. That, the total population of the Preliminary constituency is 223504 which is consisted upon east to west which is existed between two mountains which has no geographically compact and also physical feature in which the units of administrative boundaries have been affected

while it is pertinent to mention here that in the mid of this Constituency another constituency existed PB-32 Quetta-VIII, which is also against the Rules and regulation and the same is against the ingredients of Section 20 of the Election Act, 2017, which is not accessible nor approachable to the representative of the area, therefore the consideration cannot be possible in the eyes of public interest.

- C. That it was also observed by the National and International news agencies likewise the real fact of the delimitation was drawn in the Dawn Newspaper in its issue dated 20-03-2018 with the title of "Delimitation Paradox" inequality is a direct outcome of the law itself that has set the principles of delimitation written by Tahir Mehdi, it means independently observed the preliminary delimitations of Election Commission of Pakistan of the Constituencies overall Provinces of the country,

therefore, the same needs consideration.

D. That, the Preliminary delimitation was taken into consideration by the administrative authorities of the Quetta District and it was also observed by the then Deputy Commissioner, Quetta with a notification dated 25-10-2017 to rectify the preliminary constituencies of Quetta District, which is evident from that rectification the preliminary constituencies of Quetta District needs to be considered with the new proposal of this representation.

PROPOSAL FOR CONSTITUTION OF THE
CONSTITUENCY PB-33 QUETTA-IX

1. If the above constituency be constituted in the manner laid down under the Section 20 of the Election Act, 2017, that the access and control of the public of constituency will be practical because the square shape is the mandatory requirement of the constituency here it needs which is countable under the law and nature and

also the population according to the Patwar circle and charge is like-wise;

S.#	Particulars	Population
i.	Patwar Circle Kechi Baig-I	72363
ii.	Charge No.10	88019
iii.	Charge No.13, Circle No.1, 2, 3 & 4	88909
	Total Population	249291

With the above proposal, whereby affected by the proposal of the representation the constituency PB-31 Quetta-VII will be proposed as under:-

Proposed Constituency PB-31 Quetta-VII:

S.#	Particulars	Population
i.	Patwar Circle Shadinzai-II	77477
ii.	Patwar Circle Shadinzai-III	47464
iii.	Patwar Circle Kechi Baig-II	26200
iv.	Charge No.13, Circle No.5 & 6	28472
v.	Charge No.14, Circle No.1, 2, 3 & 4	67138
	Total Population	246751

Constituency PB-30 Quetta-VI:

S.#	Particulars	Population
i.	Charge No.01, Circle-01 Cantt:	15954
ii.	Charge No.11	63343
iii.	Charge No.12	113541
iv.	Charge No.14, Circle No.5	62940
	Total Population	255778

Therefore, the constituency PB-30 Quetta-VI & PB-31 Quetta-VII will be constituted in the manner as mentioned above.

P R A Y E R:

It is, therefore, respectfully prayed that in view of submissions made hereinabove, it is humbly prayed that preliminary delimitation of PB-33 Quetta-IX, PB-30 Quetta-VI and PB-31 Quetta-VII be re-notified in the manner as prescribed in the representation of proposal detailed supra. Any other relief which this Hon'ble authority may deem fit and proper in the circumstances of the case is also solicited, in the interest of public and justice.

Quetta.

Dated:02-04-2018


PETITIONER
Nasrullah Khan Barrech