

SUBJECT:- REPRESENTATION CUM OBJECTIONS IN TERMS OF 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 applicant most respectfully submits as under:-

1. That the applicant is a registered voter of Gazzag in Tehsil Gazzag District Kalat now part of PB-38 and NA-268, as such, interested in democratic norms, election in the country, particularly in the delimitation of his own constituency, hence has a right to make representation and raise a voice against incorrect delimitation process.
2. That the above constituency is part of Balochistan which is the largest province in measurement but smallest in population, the area of this part of country is 347190 Square Kilometer while the population is 12344739, to the National Assembly sixteen general seats have been allocated for Balochistan in the forthcoming elections, whereas three are meant for women. Similarly in the Provincial Assembly fifty one seats of Provincial Assembly's candidates are to be elected directly while eleven and three seats have been reserved to women and the minorities respectively.
3. That the constituencies of National Assembly in Balochistan are based on some data which has recently been notified by this Commission, detail whereof is given below:-

Ser	NA	Constituency	Districts	Population
i).	257	Killa Saifullah	a) Killa	806474

		cum Zhob cum Sherani	Saifullah b) Zhob c) Sherani	
ii).	258	Loralai cum Musa Khail cum Ziarat cum Duki cum Harnai	a) Loralai, b) Musakhail, c) Ziarat, d) Duki, e) Harnai	821856
iii)	259	Dera Bugti cum Kohlu cum Barkhan cum Sibi cum Lehri	a) Dera Bugti, b) Kohlu, c) Barkhan, d) Sibi, e) Lehri	950056
iv).	260	Nasirabad	Nasirabad	492609
v).	261	Jaffarabad cum Sohbat Pur	a) Jaffarabad b) Sohbatpur	714351
vi).	262	Kachi cum Jhal Magsi	a) Kachi b) Jhal Magsi	386255
vii).	263	Pishin	Pishin	736481
viii).	264	Killa Abdullah	Killa Abdullah	757578
ix).	265	Quetta-I	Quetta	728296
x).	266	Quetta-II	Quetta	797994
xi).	267	Quetta-III	Quetta	749409
xii).	268	Mastung cum Chagai cum Kalat cum Shaheed Sikandarabad cum Noshki	a) Mastung b) Chagai, c) Kalat, d) Shaheed Sikandarabad, e) Noshki	1083497
xiii).	269	Khuzdar	Khuzdar	802207
xiv).	270	Panjgur cum Washuk cum Kharan cum Awaran	a) Panjgur, b) Washuk, c) Kharan, d) Awaran	770754
xv).	271	Kech	Kech	909116
xvi).	272	Lasbella cum Gwadar	a) Lasbella, b) Gawadar	837806

4. That similar detail in Provincial Assembly (PB) is given

below:-

PB	Constituency	Population
1	Sherani	153116
2	Zhob	310544
3	Killa Saifullah	342814
4	Musakhail	167017
5	Loralai	244400
6	Duki	153000

7	Ziarat cum Harnai	257439
8	Sibi cum Lehri	251547
9	Barkhan	171556
10	Kohlu	214350
11	Dera Bugti	312603
12	Nasirabad-I	249492
13	Nasirabad-II	243117
14	Jaffarabad-I	252611
15	Jaffarabad-II	261202
16	Sohbat Pur	200538
17	Jhall Magsi	149225
18	Kachhi	237030
19	Pishin-I	241886
20	Pishin-II	244757
21	Pishin-III	249838
22	Killa Abdullah-I	182851
23	Killa Abdullah-II	167404
24	Killa Abdullah-III	407323
25	Quetta-I	237598
26	Quetta-II	267654
27	Quetta-III	223044
28	Quetta-IV	265628
29	Quetta-V	260187
30	Quetta VI	272179
31	Quetta VII	247459
32	Quetta VIII	278446
33	Quetta IX	223504
34	Nushki	178796
35	Chagai	226008
36	Mastung	266461
37	Shaheed Sikandarabad	200752
38	Kalat	211480
39	Khuzdar-I	273999
40	Khuzdar-II	271466
41	Khuzdar-III	256742
42	Washuk-cum-Kharan	332358
43	Panjgur	224111
44	Awaran-cum-Panjgur	214285
45	Kech-I	233765
46	Kech-II	241277
47	Kech-III	204916
48	Kech-IV	229158
49	Lasbela-I	282359
50	Lasbela-II	291933
51	Gawadar	263514

5. That reason to reproduce the details of para No.3 & 4 in this representation is to highlight many things unnatural, i.e. areas, population etc of some constituencies in the Province which are apparent on the face of record, as such can be noticed with a naked eye even without arguments.

6. That this commission is preliminary delimitation suggested the constituency as NA-268 consisting upon five Districts including Noshki and Chagai which has no nexus with the remaining part of constituency, distance between the same is around 200 Km to 250 Kms, as such, it was never been the part in the past, so it may also not be future also.

7. That in the circumstances, the petitioner being a registered voter of NA/ PB in question i.e. NA-268P and B-38 and aggrieved/ interested to correct the wrong made in preliminary delimitation to file this representation cum objection on the following amongst other grounds:-

#### GROUNDS

- A. That till now the final census report has not been published, as such, the whole exercise appears to be premature.
- B. That there are no similarities while making the constituencies in respect of areas and population, hence on this count too it is bad.
- C. That the maps of the constituencies prepared by this Commission have been supplied late, besides

these are incorrect and do not tally with the maps of Survey department even it is not in consonance of Goggle maps, hence the commission may look into.

- D. That the criteria meant in the Election Act, 2017 and the rules have been ignored resulting miscarriage of justice.
- E. That the areas Noshki and Chagai have been included in the constituency in question are of Noshki and Chagai be made a separate constituency, though this area has not been connected with the remaining part of the constituency in question, the distance between the parts of Constituency even the population can't be ignored beside the area which is more than KPK hence this commission may look into.
- F. That reasons to make the constituency would be the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituencies, hence required to be corrected.

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It is, therefore, respectfully prayed that preliminary delimitation may be revised, the area "Noshki & Chagai" may be separated from NA-268, two Constituencies i.e. NA 260 & 262 may be made one constituency and the area of Noshki and Chagai be made a separate constituency with any other relief as deemed fit and proper in the circumstances of the matter in the interest of justice.

  
APPLICANT

Hafiz Muhammad Qasim  
S/o Hakim Abdul Majeed,

DATED: -03-2018 R/o Village Gazzag, Tehsil Gazzag, District Kalat,

ENCLOSURES

1. Copy of Map of constituency NA-268.
2. Draft List of constituencies (National Assembly) along with population of Baluchistan Province
3. Any other document will be filed subsequently after obtaining permission from this Hon'ble Authority.