

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 Shindi in Tehsil Jhal Jao District Awaran now part of PB-44 and NA-270, 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 3,47,190 Square Kilometers while the population is 12,344,739, to National Assembly sixteen general seats have been allocated for Balochistan in the forthcoming elections, whereas three are meant for women. Similarly, in 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: -

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Ser	NA	Area	Districts	Population
i).	257	Killa Saifullah cum Zhob cum Sherani	a) Killa Saifullah b) Zhob c) Sherani	806474
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	Area	Population
1	Sherani	153116
2	Zhob	310544
3	Killa Saifullah	342814

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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

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51	Gawadar	263514
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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 which are apparent on the face of record.

6. That for the purpose of this representation cum objections PB-44 Awaran-Cum-Panjgur is the subject matter, historically Awaran has an independent seat in the past, it never been a part of Panjgur which is far away as in between the two areas there is distance of around 500Km, from road there is no other connectivity which take more than seven hours, there are many mountains and rivers between the Awaran and Panjgur which separates these areas, both have separate administrative entities, the people of both the areas never visit the area of other as they are not inter dependent.

7. That there is always threat in Awaran since last 12 years, detail of incidents happened in the last five years are detailed below: -

Kidnapped/Murder	Militant Attacks on Security Forces	Security forces Operations	IDs and Boom Blasts	Dead bodies Recovered by Forces
312	120	40	128	120

8. That in the circumstances, the petitioner being a registered voter of NA/ PB in question i.e. Block Code No. 477040132, Sr.No. 19 and Electoral area Shindi Tehsil Jhal Jao District Awaran is aggrieved/ interested to correct the wrong made in preliminary delimitation to file

this representation cum objection on the following amongst other grounds: -

GROUNDS

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- A. That till now the final census report has not been published, as such, the whole exercise appears to be premature.
- B. The Preliminary list of Provincial Assembly constituencies of District Awaran have been made in violation of sub-section of Section 20 of the Election Act, 2017. As per sub section (1) of Section 20 of the Election Act, 2017 there is no need to disturb existing boundaries of administrative units as this practice is observed almost all districts of Balochistan Province, but this has been violated in District Awaran.
- C. That the maps of the constituencies prepared by this Commission have been supplied late besides 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 area of PB-44 Awaran-Cum-Panjgur is measuring around 32,000Sq. Km while the areas of remaining part of Panjgur PB-43 constituency is 14,500Sq. Km is less than it besides disturbance is also a factor, but has been ignored, while making the constituency.

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- E. That the criteria meant in the Election Act, 2017 and the rules have been ignored resulting miscarriage of justice.
- F. That the alternatively areas of District Khuzdar can be added in the old constituency of Awaran as these areas are situated on the less distance (339 Km) then of Panjgur and the total population of these areas included Awaran district is 202714.
- I. Awaran District (122011)
  - II. Ornach Sub Tehsil of Khuzdar District (37732)
  - III. Patwar Circles of Qanungo Halqa Saddar Nal of Tehsil Nal: -
    - a) Garak Of Khuzdar District (233117)
    - b) Durnali Of Khuzdar District (19654)
- G. That a part of Panjgur district has been included in the constituency in question but this area is not connected with the remaining part of the constituency in question, in between the both two is 500Km distance but ignored.
- H. 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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- I. That the total area of the Panjgur-Cum-Awaran is 16,900 Sq.Km as mentioned in the delimitation map which is against the fact according to the Pakistan Bureau of Statistics the actual area of Awaran is 29,510Sq.Km while the area of Panjgur is 16900Sq.Km , hence total comes to 46,410Sq.Km.
- J. That the population of Awaran in 1981 was 110,353 persons and in 1998 it became 118,173 persons with the average annual growth rate (0.40%) according to the Pakistan Bureau of Statistics and in 2017 census the current population of Awaran is shown to be 122,011 persons i.e. after 20 years there is a raise of approximately 4000 person which figure is not digestible.
- K. That in the year 2013 the registered voters of Awaran were 56,389 and now in 2018 the value of registered voters is 68,300 of overall population which is 122,011 and according to the values the percentage of the registered voters is 56% of the overall population, however the population of Panjgur according to the Pakistan Bureau of Statistics is 316,385 and registered voters as per ECP data are 85140 which is 27% of registered voters which seems unnatural.
- L. That as an example the total area of Jhal Magsi is 3615Sq.Km, registered voters are 50,949, whereas the

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overall population is 149,222 in 2018, which is a 34% of the registered population and retaining its status of PB-17 which is unjustifiable. There are also other examples of such type of injustices/ ignorance's.

- M. That according to the Published report of Pakistan Poverty Alleviation Fund (PPAF) published on 03<sup>rd</sup> January, 2015, as on 11<sup>th</sup> October, Balochistan PDMA estimated 30,000 families (200,000 People) have been affected in Awaran, Kech, Kharan, Panjgur, Washuk and Gwadar districts. Some 50-60 Thousand individuals had abandon their houses in Awaran due to an earthquake in 2013. More than 80% of these persons were temporarily displaced to Lasbela.
- N. That district Awaran is a backward area of Balochistan province where people already feels that they have been deprived from their rights, if a separate constituency of provincial assembly is not allocated to the district this will ultimately increase the sense of deprivation needless to mention here that historically the Awaran remained as an independent constituency.
- O. That Government has award several incentives to bring population in equivalence to the other areas if they are not given with a separate provincial



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assembly seat it will create sense of un-  
satisfaction/justification.

It is, therefore, respectfully prayed that preliminary delimitation may be revised, the area "part of Panjgur" recently added in the proposed constituency may be separated from Awaran and this area be added in the remaining part of district Panjgur (proposed PB-43) alternatively the area of district Khuzdar: -

I. Ornach Sub Tehsil of Khuzdar District (37732)

II. Patwar Circles of Qanungo Halqa Saddar Nal

of Tehsil Nal: -

a) Garak Of Khuzdar District (233117)

b) Durnali Of Khuzdar District (19654)

may be included in the constituency of Awaran (PB-44) on separating the part of Panjgur district which has no concern or connection with the constituency of Awaran beside granting any other relief which may deem fit and proper in the circumstances of the matter in the interest of justice.

APPLICANT



JAMIL AHMED

S/O ABDUL MAJEED BIZINJO  
R/O SHINDI, JHAL JAO, CAMP JHAO,  
TEHSIL JHAL JAO, DISTRICT AWARAN.

DATED: 03-2018