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IN THE ELECTION COMMISSION OF PAKISTAN

Representation No. \_\_\_\_/2018

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 77 Union Council GOANZI in Tehsil TUMIP District Kech Balochistan now part of PB 48- Kech-IV and NA 271, Shumariati Code No. 481020303 Silsila No. 77 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 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:-

Ser	NA	Constituency	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

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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

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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 which are apparent on the face of record.

6. That if one has to examine the material relating to that area, from naked eye it appears that some areas which are not the natural part of the constituency have been added in the constituency wrongly and against the spirit of law and scheme of delimitation.

7. That in the circumstances, the petitioner being a registered voter of NA/ PB in question i.e. NA-271 and PB-48 Kech-IV is 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 appear to be premature.

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- 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 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 an areas/ union councils Sool Band and Kalatook were previously part of PB-46 Kech-II, but in the instant delimitation, the same have been removed from the PB-46 Kech-II and added in PB-48 Kech-IV, it may also be not out of place to note here that the said union councils have no relevancy or nexus with PB-48, hence the delimitation to this extent is required to be revived.
- F. That the criteria meant in the Election Act, 2017 and the rules have been ignored resulting miscarriage of justice.
- G. That there is no economic, cultural, cognitive and social relationship between the areas which have

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been removed from PB-46 and added in PB-48, as such, required to be removed.

F. That furthermore, the population of the constituency was/ is within quota, it is to mention here that the population or a part of population cannot be attached in the constituency owing to the fact that this will also increase the quota.

J. That reasons to make the constituency would be to bring the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituencies, hence required to be corrected.

It is, therefore, respectfully prayed that preliminary delimitation of PB-48 Kech-IV may be revised by removing the Union Councils Sool Band and Kalatook from PB-48 Kech-IV and restoring the same in PB-46 Kech-II, with any other relief in the interest of justice.

APPLICANT



52204-10626989

DATED: 03-04-2018