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BEFORE THE HON'BLE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

(h)

OBJECTIONS REGARDING ALTERATIONS/MODIFICATIONS

UNDER SECTION 21(2) OF THE ELECTION ACT, 2017 AND

RULES THERE UNDER REGARDING NA-157 & 156 (MULTAN)

ON BEHALF OF RANA ABBAS ALI SON OF ABDUL AZIZ,

RESIDENT OF UNION COUNCIL NO.63 SEETAL MARRI,

MULTAN

Respectfully Sheweth,

- That the applicant/objector is resident of Union Council 63 (Seetal Marri), Multan and is registered voter of Seetal Marri, Multan.
- 2. That the applicant raises objections about alterations and modifications of delimitation of the constituencies NA-156 and NA-157 Multan in the following terms and grounds:
 - i. That the applicant is resident of Mauza Seetal Marri, previous NA-148, now proposed as NA-157, however now wrongly against the law on the subject Mauza Seetal Marri has been included in proposed NA-156, previous NA-150, as the applicant is voter of above said territory, hence has every right to challenge the delimitation of above said constituencies of NAs.
 - ii. That for understanding the preposition, in map of Municipal Corporation, Multan, the applicant has filled colours in the same, yellow colour would indicate proposed NA-156, green colour shows delimitation of proposed NA-157, sky-blue coloured portion

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is requested to be included in proposed NA-157 and pink coloured area may be included in proposed NA-156.

- iii. That NA-156 is consisted of mostly old city areas, whereas NA-157 consists of rural areas, Mauza Seetal Marri is the area, which in the recent past has been developed, mostly the same area is of rural nature, hence the applicant is praying that same may be included in NA-157, as this Mauza has common problems alike the other areas of NA-157.
- iv. That Mauza Seetal Marri is best suited to be included with NA-157 on the following points:
 - a) That approach road of Mauza Seetal Marri and areas of NA-157 is common.
 - b) That sewerage system, electric system, lines of sui-gas etc. of above said are common with areas of NA-157.
 - c) That if circles No.6, 7, 8, 9 of Charge No.14 are not included in NA-157, principle of compactness shall be violated.
 - d) That if the map prepared by the applicant is perused in its true perspective, Circle No.5 of Charge No.17 has been included with NA-157, in the same way Circle No.6 of Charge No.17 has also been included with NA-157, thus surely this is intrusion in NA-156 and shape of NA-157 becomes an odd, it can also be termed as tailor cut, which is illegal and erroneous in the eyes of law.
 - e) That principle of compactness, population, physical features, facilities of communication, public and homogeneity have been violated.
 - f) That according to the proposed delimitation, the population of NA-156 is 8,18,890/-, whereas the population of NA-157 is 7,74,683, thus there is much difference of 44207 of population of both the adjacent constituencies, it would not be out of place to mention here that population of circles No.6, 7, 8 & 9 of Charge No.14 i.e. 50422 is requested to be included in the population of NA-157 while excluding from NA-156 and



population of circles No.5 & 6 of Charge 17 i.e. 25536 shall be included in NA-156, while excluding from the population of NA-157, in this way, the proposed population of NA-157 would become 7,99,569 and population of NA-156 would become 7,94,004, thus the population of both the constituencies shall also become very near to each other, in this way, difference of population of both the constituencies would be logical and based upon rationale

- g) That the above said alterations are inconsonance with law on the subject, the same are expedient for the interest of justice.
- h) That if the above said alterations/modifications are not permitted not only the applicant rather public at large would also be effected adversely.
- i) That Mauza Seetal is the last boundary of proposed NA-156, the culture of the same is alike to the culture of NA-157, the people of the same homogeneity resides as people of area of NA-157.
- j) That if the objections of the petitioner are accepted, both the NAs remain compact.
- k) That presently the shape of NA-157 and NA-156 are odd, which is not permissible under the law.
- That if Mauza Seetal Marri is included in NA-157, one has not to cross the natural boundaries i.e. Railway Lines as well as an old big canal.
- m) That other developmental schemes of Mauza Seetal Marri are also common with territories with NA-157.
- n) That at the time of delimitation of above said constituencies, compactness of the areas, physical features, existing boundaries, administrative units, facilities of communication, public convenience and homogeneity have not been adhered to, hence it is adviseable and in the fitness of things that objections of the applicant may be accepted.



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o) That as required areas to be included in NA-157 were previously part of NA-148 (proposed NA-157), hence in the past development schemes i.e. construction of roads etc. were made while treating the same part of one constituency, now by including the same in NA-156, all the development schemes shall be disturbed.

Prayer:-

In view of the above submissions, it is therefore most respectfully prayed that objections be accepted and circles No.6, 7, 8 & 9 of Charge No.14 may be ordered to be included in proposed NA-157 while excluding the same from NA-156, further circles No.5 & 6 of Charge No.17 may be included in NA-156 while excluding the same from NA-157 and accordingly delimitation of above said NAs may be ordered to be carved out/made in the supreme interest of justice.

Through:-

CH. KHALIL-UR-REHMAN,

Advocate High Court, 20-Justice Munir Block, District Courts, Multan

Verified on oath that the contents of the objection petition are correct and true to the best of my knowledge.