

2

BEFORE THE HONOR'BLE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

REPRESENTATION No. _____ /2018

Zulqarnain S/o Abbas Raza Khan resident of New Garden Town, Mohallah Munirpura Bhatta, Multan

(PETITIONER)

REPRESENTATION UNDER SECTION 21(3) OF THE ELECTION ACT, 2017 READ WITH RULE 12 & 13 OF THE ELECTION RULES, 2017 FOR ALTERATION/MODIFICATION IN THE DELIMITATION OF CONSTITUENCY PP-213 MULTAN-III DISTRICT MULTAN

Respectfully Sheweth,

1. That the undersigned is registered voter of PP 212 OF Multan District. The vote of the Petitioner is registered in the Electoral List of Masoodpur Teba at serial No. 235. The certified copy of the voter list is annexed herewith as **Annexure-A**.
2. That the according to the delimitation issued by the Honorable Election Commission of Pakistan, the area delimited for the purpose of PP-212 & 213 consists of following areas,

PP-212

- i. Muzafarabad QH of Tehsil City. And
- ii. Shershah QH of Tehsil Saddar excluding Taj Pur PATWAR Circle of Multan District

PP-213

- i. Multan Cantt. Of Multan Saddar Tehsil,
- ii. Multan Cantt. Qanoongo of Multan City Tehsil excluding the following Patwar Circles:

[Handwritten signature]

- A. Dorana Lagana
 - B. Piran ghaib
 - iii. The following Census Charges of Municipal Corporation Multan:
 - A. Charge No. 23
 - B. Charge No. 18
 - C. Charge No. 19
- Of Multan District

[Copy of the Map of PP-213 issued by Pakistan Bureau of Statistics, Multan Municipal Corporation is attached as Annexure-B]

3. That the delimitation of the PP-212 & 213 Multan III has been done in violation of the principles laid down in Section 20 of the Election Act, 2017. The relevant provisions of Section 20 are reproduced herein below for ready reference,

20. Principles of delimitation.—(1) All constituencies for general seats shall, as far as practicable, be delimited having regard to the **distribution of population in geographically compact areas, physical features**, existing boundaries of administrative units, **facilities of communication and public convenience** and other cognate factors to ensure homogeneity in the creation of constituencies.

4. That the preliminary delimitation of the constituencies published by Election Commission of Pakistan is not compact and clockwise as required under the law but said delimitation will also cause serious inconvenience to the public at large of District Multan, if same is not altered or modified in accordance with the provisions of the Election Act, 2017.
5. That the Petitioner's area was always remained part of PP-213 being urban area, however all of sudden, the Petitioner's area has been excluded from the PP-213 consisting of similar urban areas and has been included in PP-212 which is primarily consisting of rural areas which would cause serious inconvenience to the public residing in said areas. The previous delimitation of PP-213 was Compact and convenient for the Public.

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6. That the delimitation of the PP-213 is otherwise against the law as it delimited in anti-clockwise rather clockwise as required under the law.
 7. That the Petitioner is willing to propose a delimitation plan that is most suited in terms of Section 20 of the Elections Act, 2017.

PROPOSED PLAN

The area covered falls Union Councils 37, 38, 40, 41 and 62 (Charge No. 19 Complete and Charge No. 18, Circles No. 01, 02, 03,05, 07, 08) comprising of total population of 132,220 may be excluded from the PP-213 and be included in PP-212. The area falls in Union Councils 77, 78, 79 and 80 comprising of total population 107,940 be included in PP-213 and be excluded from PP-212.

[Copy of the MAP showing the Proposal of the Petitioner are attached as **Annexure-C**]

8. That the above-mentioned submissions are according to the principles of natural justice and fair play and also in accordance with Section 20,21 of Election Act 2017 and relevant Rules.

PRAYER

In view of what has been stated above, it is humbly prayed that the instant Petition may very kindly be accepted and the constituency PP 212 & 213 MULTAN may very kindly be delimited as proposed by the petitioner and in accordance with law.

Any other relief which this Honorable commission deems fit may also be granted in the supreme interest of the justice.

THROUGH



PETITIONER



Waqas Umer
Advocate High Court