

*Jawad*  
24.4.18

**THE HONORABLE SECRETARY, ELECTION COMMISSION**  
**OF PAKISTAN**

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

On behalf of:

Malik Ghulam Abbas Khakhi son of Malik Muhammad Bukhsh, resident of Adda Pul Jalal Pur Khaki Shuja Abad, Distt. Multan.

Subject: OBJECTIONS / REPRESENTATION TO THE DRAFT PROPOSALS FOR DELIMITATION OF CONSTITUENCIES UNDER PARA NO.35 OF ITS NOTIFICATION NO. F.8(3)/2018 ELECTION DATED 5<sup>TH</sup> MARCH, 2018 ISSUED FROM THE OFFICE OF THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD UNDER SECTION 21(3) OF THE ELECTION ACT, 2017 READ WITH RULE-11 (4) OF THE ELECTION RULES, 2017 FOR THE DELIMITATION WITH REGARD TO CONSTITUENCY NOS. 158 OLD 152 MULTAN (V) AND NA 159 OLD 153 MULTAN(VI) BEING IMPROPER CONTRARY TO THE REAL POSITION AT SPOT AND FOR AMENDMENT AND MODIFYING THE SAME.

Respectfully Sheweth,

1. That the representative is the resident of Mouza Wahi Bakhar Tehsil Shuja Abad, Distt. Multan being public representative of the Constituency mentioned above who being voter is acting Chairman of Union Council Raja Raam and PC Wahi Bakhar, which is part of the above said UC 148 Raja Raam. Copy of voter list is annexed as R/1.
2. That as per different paras of the above notification being annexed as R/2, the Honorable Election Commission of Pakistan has really performed its responsibility wisely, honestly, justly, fairly in order to conduct to near future general elections of Provincial Assemblies and National Assembly of Parliament of Pakistan.

3. That while issuing the aforesaid notification, inadvertently some illegalities and irregularities have been made which are required to be removed through amendments on the following grounds:

**GROUND:**

- A. That the petitioner is enrolled as a voter in the constituency NA 158 Multan.
- B. That every authority is required to act as per law and to facilitate the public instead of creating hurdles, difficulties and problems, as such, the required amendments and modifications are liable to be made in the aforesaid Notification.
- C. That unluckily the representative being the candidate of Member of National Assembly or Provincial Assembly is the voter of Constituency No. 158 old No. 152 whereas, as per the questioned delimitation notification, he has been shifted in Constituency No. 159 old No. 153 which is improper and impracticable, as such, the QH Raja Raam, which has already been broken, the following PC Wahi Bakhar, Wahi Sawaya, Kotli, 13 Faiz may kindly be remained intact in Constituency No. 158 old No.152, of which the undersigned is representative and voter and the whole QH Gunwan may kindly be remained intact in constituency No. 159 old No. 153.
- D. That as per challenged Notification, old QH Gunwan has been broken which law does not permit, as provided in rule-10 of Election Rules, 2017, the broken of GH is only permitted in circumstances, where the question of population cross the limits of voters determined for a constituency, which question is

-4- 

not involved in case in hand, as such, said notification is liable to be amended and modified reasonably.

- E. That as per challenged notification of delimitation, the undersigned has been thrown out from his constituency No. 158 old No. 152 being resident of PC Wahi Bakhar of QH Raja Raam, which has already been broken, which has been shifted to constituency No. NA 159 old No. 153 which is unjust, unwarranted and not permitted by delimitation law, as such, is liable to be modified and amended in the term that QH Gawan may kindly be intact in toto being in previous position.
- F. That the patwai circle of QH Raja Ram, PC Wahi Bakhar has been shifted from constituency No. 158 old 152 to constituency No. 159 old No. 153, which is unjust and improper for the voter members of these areas, as the whole theme of delimitation is to facilitate them. Therefore, it is proposed that all the mentioned PCs i.e. Kotli Najabat, PC Wahi Sawaya and PC Chak 13 Faiz and Wahi Bakhar may be included in Constituency No. 158 old No. 152, being part of already broken QH Raja Ram, which being permitted by law.
- G. That by modifications and amendment of questioned delimitation Notification total number of voters do not exceed as per law and particularly voters of QH Raja Raam will be facilitated, and also the voters of QH Gunwa (Jala Pur Khaki).
- H. That the electricity grid station of the area in NA-158 WAPDA office, SNGPL offices, the complaint offices are in NA-158.

- I. That since last two decade these areas i.e. PC Jala Pur Khaki remain in NA-159 and the area PC Wahi Bakhar, Wahi Sawayia Kotli Najabat and Chak No.13 of QH Raja Raam remain in NA-158.
- J. That the clock wise movement of the Constituency for delimitation is also being violated as in accordance to the ECP Rules and Laws said people of charge / areas merit to be included / excluded in the proposed in the proposed NA-158.
- K. That as proposed and suggested above through this representation, all the requirements and principles of delimitation as provided under section 09 of Delimitation of Constituties Act, 1974 No. XXXIV of 1974 and section 20 of Elections Act, 2017, like distribution of population in geographically compact area, physical feature, existing boundaries of administrative unit, facilities communication and public convenience and other factors to ensure homogeneity in the creation of constituency are met with, as such, necessary modifications are liable to be made.
- L. That the draft proposal made by the representative is purely based upon law and in consonance with the scheme, theme and wisdom of Election Commission of Pakistan as categorically expressly enshrined in the ab-initio of challenged delimitation notification as mentioned above.
- M. That the netshell of the above grounds and proposals are culminated as follows:

6-



## PROPOSALS

i. **NA 158 old 152**

Total population 756003  
If subtracted 17860 (PC Jalal Pur Khaki QH Gunwan  
Total remaining Population will be 738143  
And when added the population of mention PCs of QH  
Raja Raam i.e. 35111  
Then Total Population will be 773254

ii. **NA 159 old 153**

Total Population 771838  
If subtracted 35111  
Total remaining population 736727  
And as proposed amendment by adding population of  
Jalal Pur Khaki PC i.e. 17860 then the total population of  
NA 158 then the total population of NA 159 will be  
754587

So as per above, no violation of any law is made as prayed for  
the amendment, as the limit of population is not exceeded.

NA No.	Proposed Distribution by Commission (ECP) for 2018 election	Population by election of Pakistan	Proposed / suggested by the Applicants
158	7,56,003		7,73,254
159	7,71,838		7,54,587

N. That as per requirements of the representation, prepared maps  
and marked maps are annexed herewith as Annexure-R/3.

### PRAYER:

In view of the above, it is prayed that by accepting this  
representation, proposed draft may be accepted and modification and  
amendment may accordingly be ordered to be made in terms that the PCs  
Wahi Bakhar, Wahi Sawaya, Kotli Najabat and Chak 13 of QH Raja Raam  
may kindly be included in NA 158 old 152 and the Jala Pur Khaki of QH

-7- 

Runwa may kindly be intact in NA 159 old 153, which is in the interest of justice. Alternate remedy is also prayed for.

Representative  
Malik Ghulam Abbas Khakhi

Through:  
Counsel

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