## BEFORE THE HON'BLE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD:

REPRESENTATION U/S 20 (2 & 3) OF THE ELECTION ACT, 2017 R/W RULE
12 OF THE ELECTION RULES , 2017 IN RESPECT OF PURPOSED
CONSTITUENCY NA-153:

Respectfully Sheweth;-

i)

- 1. That the Petitioner is registered voter of NA-153, Copy of vote certificate is attached as **Annex. A**.
- 2. That the constituency NA-153 has been notified by the Election Commission of Pakistan, Copies of notification and map are attached as **Annex. B & C** respectively.
- 3. That the purposed constituency NA-153 Khanewal is liable to be amended / corrected and requires to be delimited as per proposal of the Petitioner, inter alia on the following:-

## GROUNDS:

That the areas of Patwar Circle (PC) Khanewal of Qanongoie Headquarter (QH) Kahanewal-I comprising of Chak # 168/10-R & Chak # 88/10-R have illegally and unjustifiably included in NA-153 as Chak # 68/10-R being notified urban area is the part of Municipal Committee Khanewal and total urban area of Municipal Committee Khanewal stood included in adjoining NA-151 Khanewal and as such practically a partial urban area comprising of Chak # 8/10-R cannot be made part of NA-153. Similarly Chak # 88/10-R of PC Khanewal has no geographical connection with the areas of NA-153 and the same is









2-4-18

existing in the shape of <u>Island</u> in the proposed NA-153 which cannot sustain at the touchstone the principle of geographical contiguity therefore exclusion of above said Chaks of PC Khanewal ofg QH Khanewal-I from NA-153 is in the interest of justice.

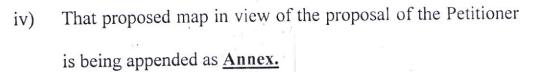
- ii) That inclusion of PC 76/10-R of QH Khanewal-I in NA-151 is without lawful justification and the said PC 76/10-R Khanewal of QH Khanewal-II warrants to be included in NA-153 on the following reasons:
  - a. PC 76/10-R Khanewal of QH Khanewal-II remained part of former NA-159 of Khanewal in the last three general elections.
  - b. The whole of the former NA-159 has been kept intact completely in proposed NA-153 except PC 76/10-R Khanewal of QH Khanewal-II.
  - c. That the exclusion of PC 76/10-R Khanewal of QH Khanewal-II has caused the in balance in the population of NA-153 as after excluding the population of 27177 of PC Khanewal of QH Khanewal-I, on the above stated technical reasons, the population of NA-153 comes to 701541 whereas the 10% variation of minimum population comes to 702000 therefore this unequal distribution of population renders the delimitation contrary to the mandate of Section 20 the Election

Act, 2017.





- d. That the physical features of PC 76/10-R Khanewal of QH Khanewal-II as well as the means of communication are common with the areas of NA-153.
- That the proposal of the Petitioner from all angles adequately address the factor of population, geographical compactness, physical features, existing boundaries, facilities of communication. Public convenience and all ancillary cognate factors.



In view of the above, it is therefore respectfully prayed that instant representation may kindly be accepted, constituency NA-153 may very kindly be delimited as per abovementioned proposal and corresponding changes / correction may also be made in constituency NA-151.

Petitioner;

Asif Mehmood Khan S/O Sultan Mehmood Khan, R/O 78/10-

R, Tehsil & District Khanewal.

Through:-

RANA ASH SAEED

Advocate Supreme Court. Opp. High Court, Multan.

Maher Irshad Arain Advocate High Court. D







| Population NA-153 proposed by ECP.             | 728718  |
|--|---------|
| Population of proposed exclusion by the        | 27177   |
| Petitioner of PC Khanewal of QH                |         |
| Khanewal-I.                                    |         |
| Population of proposed inclusion of PC 76/10-R | 13223   |
| Khanewal of QH Khanewal-II.                    |         |
| Total proposed population by the Petitioner.   | 7147764 |







## BEFORE THE HON'BLE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD:

REPRESENTATION U/S 21 (2 & 3) OF THE ELECTION ACT, 2017 R/W RULE 12 (4) OF EECTION RULES, 2017 IN RESPECT OF DELIMITATION OF NA-153:

Affidavit:

Asif Mehmood Khan S/O Sultan Mehmood Khan, R/O 78/10-R, Tehsil & District Khanewal.



That the above named deponent do hereby solemnly deposes and affirm as under:-

That the contents of the above titled petition are correct according to best knowledge and belief of the deponent.

Deponent.

## Verification:-

It is verified on 2-4-2018 at Multan that above contents are true and correct to the best knowledge and belief of the deponent.

Depondent.

Depondent.

Certified that the above was decisied on solution affirmation before me en entire one;

at furthery Multan in the District at Militan in the District at Milita