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BEFORE THE HONOURABLE ELECTION COMMISSION OF PAKISTAN

**In Re:** Representation under Section 21(3) of the Election Act, 2017 read with Rule 12(1) of the Election Rules, 2017 in relation to the National Assembly Constituency NA-154 (Multan I)

It is respectfully submitted as under:

1. This is a representation under Section 21(3) of the Elections Act, 2017 ("Elections Act") read with Rule 12(1) of the Election Rules, 2017 ("Election Rules") with reference to the draft proposal for delimitation by the Honourable Election Commission of Pakistan ("Commission") of the National Assembly constituency NA-154 (and other constituencies proposed within District Multan) as contained in the draft proposal of delimitation of the said constituency prepared and notified by the Commission pursuant to Section 17 and 20 of the Elections Act and Rule 7 and 10 of the Election Rules as its Preliminary Proposal for delimitation as provided for in Rule 11(2) of the Election Rules.
2. This representation is filed with the learned Secretary of the Commission in compliance with Rule 12(4) of the Election Rules by Mr. Mureed Abbas son of Malik Muhammad Saeed (hereinafter referred to as the "Petitioner") who is a voter of the constituency NA-154. The Petitioner is a permanent resident of Basti Muhammadwala, Mardanpur, Dakkhana Jhok Waince, Tehsil and District Multan.
3. The principal grounds on which this representation is moved and on the basis of which amendments, alterations and modifications in the preliminary proposals of delimitation by the Commission to the delimitation of NA-154 (and other constituencies proposed within District Multan) are as under:
  - (i) The delimitation of NA-154 is not compliant with the requirements of Section 20 of the Elections Act as, *inter alia*, the constituency has not been properly, correctly and lawfully delimited by giving due weight and regard to the following statutorily prescribed factors:

(a) distribution of population in geographically compact areas;

(b) physical features;

(c) existing boundaries of administrative units;

(d) facilities of communication and public and voter convenience; and

(e) other cognate factors to ensure homogeneity in the creation of constituencies in District Multan.

(ii) The constituency NA-154 has not been delimited in accordance with the principles set out in Rule 10(5) of the 2017 Rules *vis-à-vis* the requirements of starting from the Northern end of the District and then proceeding clock-wise in zigzag manner keeping in view of the population quota prescribed therein. According to the 2017 Census the total population of District Multan is 4,745,109 so the population "quota" under Rule 10(5) of the Election Rules is 790,851.5.

4. In support of the objection at paragraph 3(i) above it is submitted that the principles of Section 20(1) of the Elections Act and Rule 10(5) of the Election Rules have not been adhered to, *inter alia*, as:

(a). NA-154 from a bare perusal of the map of the constituency (as proposed by the Commission in its preliminary report) is not delimited in a "compact" shape but rather has been given a very peculiar shape. An area comprising of essentially four Patwar Circles (Tahir Pur PC, Basti Nau Dhano PC, Panj Koha PC and Madina PC) of Qadir Pur Ran QH has been carved out from NA-154 for no apparent reason whilst an isolated block of land comprising of essentially the Dorana Langana PC and Piran Ghaib PC of Multan Cantt QH have been included in NA-154. A bare perusal of the map reveals that the constituency NA-154 has been given an odd shape by arbitrarily excluding an area that forms a natural and geographical part of NA-154 (and has been included in NA-157) and a completely isolated chunk of land (surrounded by other constituencies from three sides) which naturally belongs in the constituencies NA-155 and NA-157

have been included in the area comprising of NA-154. This has resulted in a great variance in the width of the constituency at various different points.

- (b). The Commission's proposed delimitation of NA-154 has not followed, rather offends, the principle of starting from the *northern end of the district and then proceeding clock-wise in zigzag manner keeping in view that population among the constituencies shall remain as close as may be practicable to the quota*. The unusual length and shape of the constituency also does not take into account and give due weight and regard to facilities of communication and public and voter convenience.
- (c). Like most constituencies in the Punjab, under NA-154 we find two Provincial Assembly constituencies i.e. PP-211 and PP-212. Strangely, under the odd shape given to NA-154, although all of PP-212 comes under this constituency, not all of PP-211 comes under NA-154. The precise part of PP-211 that has been excluded from NA-154 is the area of Qadir Pur Ran QH described above in paragraph 4(a). This has led to the peculiar situation where the aforementioned area of Qadir Pur Ran QH, although falling within PP-211, does not fall within NA-154. Additionally, this has led to a situation whereby the constituents of PP-211 will have to vote for two National Assembly constituencies with people from one area of PP-211 voting in NA-154 and the other in NA-157. It is submitted that this grossly offends the principles of delimitation set out in Section 20 of the Elections Act and is liable to correction and rectification by this Honourable Commission through the acceptance of the instant representation.
- (d). With reference to the requirements of Section 20 Elections Act and Rule 10 of the Election Rules it is submitted that the difference of population between the constituencies in District Multan is not balanced and in conformity with the statutory requirements and principles. This error, along with the contents of the foregoing paragraphs, requires correction and the Petitioner proposes and prays that this be effected by shifting adjacent and contiguous Patwar Circles ("PCs") from NA-157 to NA-154 and from NA-154 to NA-157 as shown in the map appended herewith as Annexure "B" depicting and showing the amendments, alternations and modification sought by the Petitioner.

5. The Petitioner seeks and prays for the following amendments, alterations and modifications to the preliminary proposal of the Commission for delimitation of NA-154 (Multan I):

(a) As contained in the preliminary proposal of the Commission for delimitation of NA-154 the areas marked for NA-154 added up to a total population of 807,618.

(b) The Petitioner hereby prays that the following PCs of Qadir Pur Ran QH be *added* to NA-154 and be *excluded* from NA-157:

PC	Population
Tahir Pur PC	7,918
Basti Nau Dhano PC	4,227
Panj Koha PC	5,598
Madina PC	15,315
<b>Total Included:</b>	<b>33,058</b>

(c) The Petitioner hereby further prays that the following PCs of Multan Cantt QH be *excluded* from NA-154 and *added* into NA-157:

PC	Population
Dorana Langana PC	28,087
Piran Ghaib PC (Jahangirabad)	29,385
<b>Total Excluded:</b>	<b>57,472</b>

7. As a result of the foregoing proposal the total population of NA-154 will stand as follows:

Current Population	807,618
Inclusion	+ 33,058
Exclusion	- 57,472
<b>Total Population after amendment</b>	<b>783,204</b>

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8. Consequential to the foregoing, the proposal for amendments, alterations and modifications of the preliminary proposal would result in the following populations for the constituencies NA-154 and NA-157:

Constituency	Old Population	Proposed Population
NA-154	807,618	783,204
NA-157	774,683	799,097

9. Consequential to the amendments, alterations and modifications sought by the Petitioner to NA-154 (Multan I):

(a) the delimitation of the related Provincial Assembly constituencies namely PP-211 and PP-214, the following PCs of Multan Cantt QH be excluded from PP-211 and *included in* PP- 214:

PC	Population
Dorana Langana PC	28,087

PRAYER

Wherefore the Petitioner respectfully prays that the instant representation be graciously accepted by the Commission and that the Commission graciously make the amendments, alterations and modifications sought to the draft proposal for delimitation of NA-154 (Multan I) by the Petitioner (and all make all applicable and consequential amendments, alterations and modifications sought to the draft proposal for delimitation of NA-154 (Multan-I), NA-157 (Multan IV) and also the related Provincial Assembly constituencies listed hereinabove) all as detailed in this representation and as also depicted in the map at Annexure E hereto.

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Mohmand.

Petitioner

Through: Sikandar Bashir Mohmand  
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