

(1) (1)
BEFORE THE HONOURABLE SECRETARY ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

Representation No. _____/2018

In the matter of delimitation of constituencies:-

1. Saeed Ahmad Moni S/o Anwar Qureshi
(CNIC No.36302-8266658-9)
House No.119/120 Ward No.07 LAL Kartti Allama Iqbal Town, Multan Cantt:
Cell No.0300-7351557
2. Muhammad Yaqoob Khokhar S/o Din Muhammad
(CNIC No.36302-4439568-1)
House No.1075 Nusrat Road Kung Mandi, Multan
Cell No.0306-8803989

**REPRESENTATION UNDER SECTION 21(3) OF
THE ELECTION ACT 2017 READ-WITH THE
PROVISION OF CHAPTER III, PART A OF
ELECTION RULES, 2017 ON BEHALF OF
PETITIONERS FOR MAKING APPROPRIATE
AMENDMENT ALTERATIONS OR
MODIFICATION IN THE PRELIMINARY LIST
OF PROPOSED CONSTITUENCIES OF
DISTRICT MULTAN (PUNJAB) INTER ALIA
PROPOSED NA 154, 155**

The petitioners respectfully submits as follows:-

That the instant representation is being filed by the petitioners Saeed Ahmad & Muhammad Yaqoob Khokhar (herein referred to as the "applicants") voter member of National Assembly constituency NA 154 & PP213, (proposed) and elected member of cantonment Board Multan Cantt: the applicants duly competent to file the instant representation under the law. Attested voter number of "applicant" as Annexure" A"

(2)

(2) 4/2/2018

2. Through this representation, the applicants seeks to challenge the preliminary proposal published by the Election Commission of Pakistan pertaining to the delimitation of the National Assembly constituencies of district Multan (hereinafter referred as ("The preliminary proposal"). The map of the preliminary proposal which was provided by Provincial Election commission, as per mandate of law is attached as annexure "B".

3. It is pertinent to mention here that in the preliminary proposal district Multan is now left with 6 National Assembly constituencies numbering 154 to 159 which previously were in number 148 to 153.

4. The preliminary proposal is in sheer violation of the statutory principles of delimitation as enshrined in section 20 of the Act. It is mandatory provision of law because as per section-20 of the Act 2017 as well as section 10 of the Election Commission rules 2017 following draft proposal of delimitation of the constituencies would be the appropriate, so far the kind perusal of section 20 of the election Commission Act and section 10 of the Election Commission rules- 2017 are reproduced as under:-

Section-20 (1). All the constituencies for general section shall, as far as, practical, 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 in the creation of constituencies.

(2). For the purpose of delimiting constituencies for the general seats of the National Assembly for the tribal Areas two or more separate areas may be grouped into the constituency.

(3). As far as possible, variation in population of the constituencies of an assembly or a local government shall not ordinarily exceed ten percent.



(3)

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11/07/2018

- (4). If the limit of ten percent under sub-section (3) is exceeded in exceptional cases, the commission shall record reasons thereof in the delimitation order.

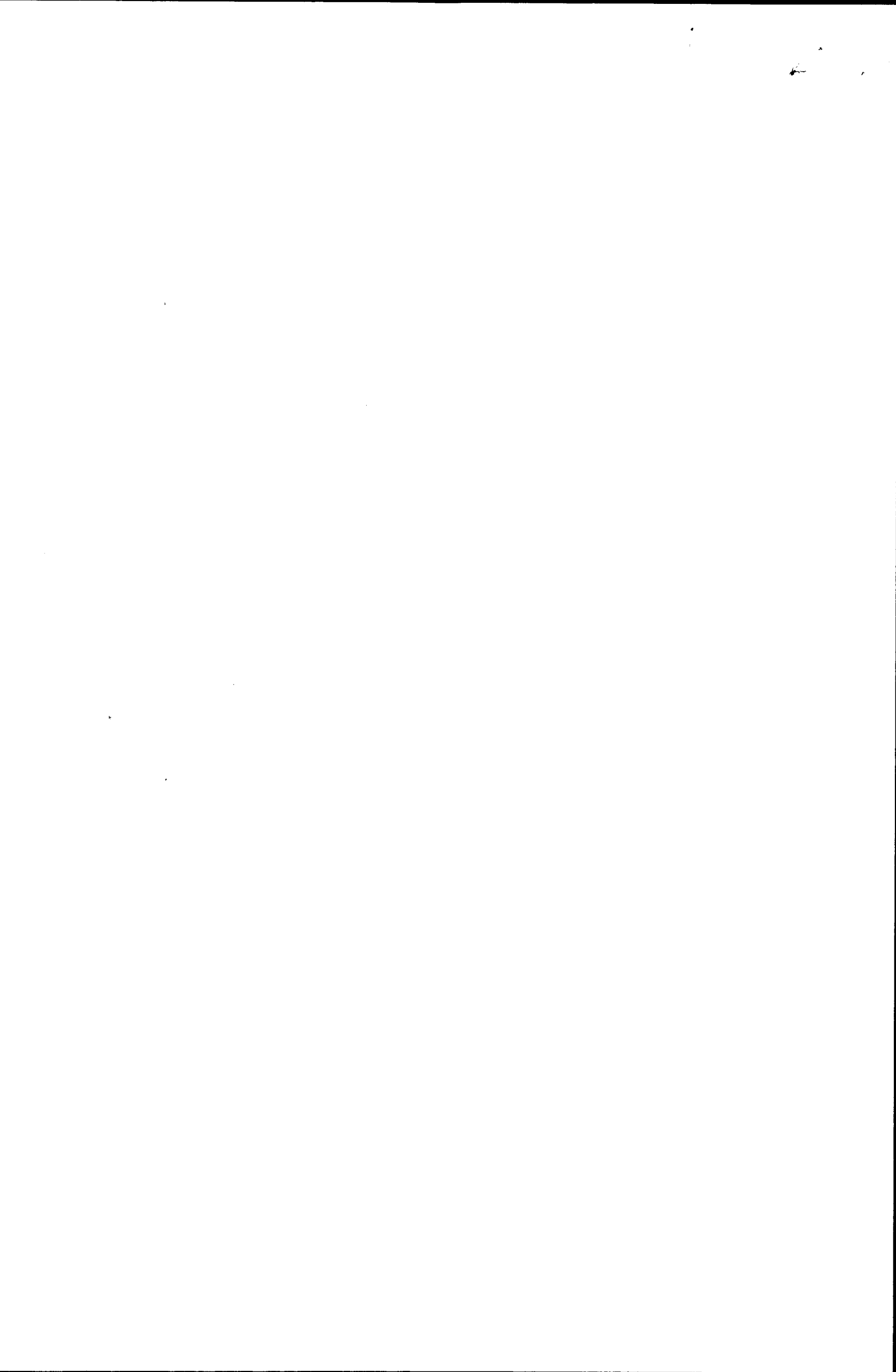
Section-10 of the Election Commission rules is also reproduced as under:-

Draft proposal of delimitation of the constituencies---(1)A Delimitation committee constituted under rule 9 shall, immediately after its constitution, proceed to obtain from Pakistan Bureau of Statistics, population data of last census officially published alongwith the relevant maps showing therein census charges, census circles and census blocks alongwith description, relating to a province, and agency, or any other administrative or revenue units as it may require.

(2) The delimitation Committee shall also obtain district maps alongwith description, duly authenticated by Pakistan Bureau of Statistics, or as the case may be, the district head of Revenue Department, prepared on a uniform scale as may be determined by the commission indicating therein details of all administrative and revenue units in the district to the level of a Patwar circle or as the case may be, a Tapedar Circle, as well as prominent geographical and physical features, such as rivers and mountains and any other information as may be determined by the commission or required by the Committee.

(3).In preparing draft proposals for delimitation of constituencies, the delimitation committee shall following the principles of delimitation as laid down in section 20 procedure given in this chapter and guidelines provided by the Commission from time to time.

4. The constituency for an Assembly shall not ordinarily extended to more than on district except in exceptional circumstances for reasons to be recorded by the Delimitation Committee.



(4)

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21/04/2018

Provided that a Patwar circle or, as the case may be, a Tapedar Circle shall be the basis unit for delimitation and it shall not be broken under any circumstances.

Provided further that in case of urban areas census circle shall not be broken under any circumstances.

(5). As far as possible, the delimitation of constituencies of an Assembly shall start from the Northern end of the district, or as the case may be, the agency and then proceed clock-wise in zigzag manner keeping in view that population among the constituencies of an assembly shall remain as close as may be practicable to the quota; provided that the quota under this sub-rule shall be determined by dividing total population of the district or the agency with number of seats allocated to that district or agency.

Provided further that the variation in population between two or more constituencies shall not ordinarily exceed ten percent and the delimitation Committee shall record reasons, if in exceptional circumstances, the variation has to exceed the limit.

(6). For the purpose of preparation or draft proposals for delimitation, the delimitation committee may require assistance from any Federal, Provincial or, as the case may be, a local government authority.

(7). After the draft proposals for delimitation of constituencies are finalized on form-5, the delimitation committee shall send the same to the commission, within the time specified and in the manner as may be determined by the committee.

So, keeping in view above-mentioned election Commission Act and election commission rules, it is deemed necessary to amend/alter/change the preliminary proposal as follows:-

Suggested Amendments in the preliminary Proposal.

Suggestion No.1

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(5)

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21/04/2019

(A) Charge 1-CBM, circle 1,2,3,4, population 24522, charge 2-CBM, circle 1,2,3,4 population 20775 total population 45297 Taken out of NA 154 and inserted into NA-155(highlighted on the map as Annexure-C.

(B) Charge No. 5 MCM circle No.7,8,9,10 population 38723 Taken out of NA-155 and inserted into NA-154,

(Highlighted on the map an Annexure-C.

Through table

| Sr. No. | NA | Charge | Circle | Population | Total | Remarks |
|---------|--------|--------|----------|------------|-------|--|
| 1 | NA-154 | 1 CBM | 1,2,3,4 | 24522 | 45297 | The population may be excluded from NA-154 and be included in NA-155 |
| | | 2 CBM | 1,2,3,4 | 20775 | | |
| 2 | NA-155 | 5 MCM | 7,8,9,10 | 38723 | 38723 | The population may be excluded from NA-155 and be included in NA-154 |

Suggestion No.2.

(A) Charge 1-CBM, circle 1,2,3,4, population 24522, charge 2-CBM, circle 1,2,3,4 population 20775 total population 45297 Taken out of NA 154 and inserted into NA-155(highlighted on the map as Annexure-D.

(B) Charge No. 6 MCM circle No.7,8,9,10, 11,12, Population 50748 Taken out of NA-155 and inserted into NA-154,

(Highlighted on the map an Annexure-C.

Through table

| Sr. No. | NA | Charge | Circle | Population | Total | Remarks |
|---------|--------|--------|------------------|------------|-------|--|
| 1 | NA-154 | 1 CBM | 1,2,3,4 | 24522 | 45297 | The population may be excluded from NA-154 and be included in NA-155 |
| | | 2 CBM | 1,2,3,4 | 20775 | | |
| 2 | NA-155 | 6 MCM | 7,8,9,10, 11, 12 | 50748 | 50748 | The population may be excluded from NA-155 and be included in NA-154 |



(6)

6.

11/07/2018

GROUNDS SUPPORTING THE SUGGESTED AMENDMENTS.

PHYSICAL/GEOGRAPHICAL

(i). Charge 1-CBM, Circle 1 to 4 & Charge 2-CBM, circle 1 to 4 (herein after referred Charge 1-CBM & charge 2-CBM) is area of population of Cantt: & Cantonment which is totally Urban Area. Also the heart of Multan city, while NA-155 is the constituency of Multan city, so the said area is geographically compact Area of NA.155.

Historical/cultural Back ground

(ii) Traditionally, historically, socially, culturally and geographically, charge 1-CBM & Charge 2-CBM has always been the part of city and NA-154 is a constituency a area falls within cantonment attached with area falls in rural.

Service/Communication

(iii) Keeping in mid all five factors narrated in (ii) ibid the layout of service, road, network, revenue, policing, education, and health etc: were accordingly aligned and developed for charge 1CBM charge 2-CBM to cantonment which is attach to NA-155 (City constituency), whereas the rest area of NA-154 except charge 1-CBM is rural.

(iv). It may be pertinent to mention here that the local population of charge 1-CBM & 2-CBM was always aligned with the constituency of city Multan.

Other cognate Factors

(v). That all the population of the cantonment Areas all over the Pakistan has been inserted in the constituencies of Municipal corporation except the area of charge 1-CBM & 2-CBM in NA.154.

(vi). Although it is clear that NA-154 is a constituency falls within rural area (except charge 1-CBM & 2-CBM) and it is a crude attempt to deprive the population of Area from the Basic facilities.

(vii). The area charge 1-CBM & 2-CBM inserted in NA-155, then the area falling in PP213 will remain the same.

(viii). The Area/Charge 5-MCM & 6-MCM inserted into NA.154, it will be a geographically compact Area.

(ix). The insertion of area charge 1-CBM & 2-CBM into NA-155 and insertion of Area charge 5-MCM & 6- MCM into NA.155 will not change the administrative boundaries of the constituencies and also the balance of population also remain according to law.

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9/1/04/2018

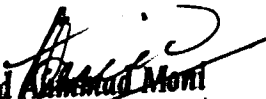
(x). It is suggested that if proposal 1 or 2 is accepted, it will remarkably facilitate & attach the urban area to city constituency (NA-155). Further more on a bare looking of Map it can easily be seen that Area charge 1-CBM & 2-CBM run deep in NA-155. This shows that a major factor of physical and geographical homogeneity (as amended by the Principles) was ignored while preparing the preliminary proposal.

5. The above mentioned grounds are suggested strictly keeping in mind the principles and welfare of the people of Multan city and it is stated that no selection of personal liking/disliking and or bias is shown while making the suggestion.

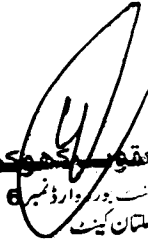
6. That the map of district Multan showing the NA constituencies after incorporation of the suggested amendments mentioned herein is attached at annexure "E"

**IN VIEW OF THE AFOREMENTIONED
GROUNDS IT IS SUGGESTED THAT THE
PRELIMINARY PROPOSAL MAY KINDLY BE
AMENDED AS PER THE SUGGESTED
AMENDMENTS NARRATED ABOVE IN THE
BEST INTEREST AND WELFARE OF THE
PEOPLE OF MULTAN DISTRICT.**

Humble petitioners.


Saeed Ahmad Moni
Member Cantonment Board
Ward No.4, Multan Cantt.

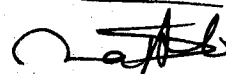
Saeed Ahmad Moni S/o Anwar Qureshi
(CNIC No.36302-8266658-9)


محمد یعقوب خوکھار
ممبر سوسائٹی بورڈ وارڈ نمبر 4
مالتان کینٹ

Muhammad Yaqoob Khokhar
S/o Din Muhammad
CNIC No. 36302-4439568-1

Through:-




Shakeel Akhtar Sindhu
Advocate High Court,
Multan

