

11




BEFORE THE HON'BLE ELECTION COMMISSION
OF PAKISTAN, ISLAMABAD

OBJECTIONS REGARDING ALTERATIONS/MODIFICATIONS
UNDER SECTION 21(2) OF THE ELECTION ACT, 2017 AND
RULES THERE UNDER, ON DELIMITATION OF
CONSTITUENCIES NA-157 & 156 (MULTAN) ON BEHALF OF
ABDUL WAHEED SON OF ABDUL SATTAR, CASTE JUTT,
RESIDENT OF UNION COUNCIL NO.62 (QUTAB PUR), MULTAN

Respectfully Sheweth,

1. That the applicant/objector is resident of Union Council No.62 (Qutab Pur), Multan and is registered voter at Sr.No.473 of block code 212180806 of Qutab Pur, Multan.
2. That the applicant raises objections about alterations and modifications of delimitation of the constituencies NA-156 and NA-157 Multan in the **following terms:-**
 - i. That the applicant is resident of Mauza Qutab Pur, previous NA-148, now proposed as NA-157, however now wrongly against the law on the subject Mauza Qutab Pur has been included in proposed NA-156, previous NA-150, in the same way, Mauza Seetal Marri, previously it was part of NA-148, now proposed NA-157, wrongly Seetal Marri has been included in proposed NA-156, previous NA-150, as the applicant is voter of above said territories, hence has every right to challenge the delimitation of above said constituencies of NAs.

- 2
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- ii. That in order to understand the preposition, in map of Municipal Corporation, Multan, the applicant has filled colours, yellow colour would indicate proposed NA-156, green colour shows delimitation of proposed NA-157, sky-blue coloured portion is requested to be included in proposed NA-157 and pink coloured area may be included in proposed NA-156.
 - iii. That NA-156 is consisted of mostly old city areas of Multan City, whereas NA-157 consists of rural areas, Multan, it would not be out of place to mention here that Mauza Qutab Pur, Mauza Jungle Khan Muhammad Wala, Mauza Bakhar Arbi, as well as Mauz Seetal Marri are the areas, which in the recent past have been developed, mostly the same areas are of rural nature, hence the applicant is praying that same may be included in NA-157, as all the four Mauzas have common problems alike the other areas of constituency NA-157.
 - iv. That Mauza Qutab Pur and Bakhar Arbi are best suited to be included with NA-157 on the **following points**:-
 - a) That approach roads of above said Mauzas are common i.e. Basti Khudadad to Farooq Pur Chowk and Old Shujabad Road, Multan while crossing Abadies of Mauza Qutab Pur and Basti Khudad (Mauza Bakhar Arbi) to Bilal Chowk, Multan.
 - b) That as stated earlier, sewerage system, electric system, lines of sui-gas etc. of above said localities are common, whereas in adjoining localities of constituency NA-156, the sequence of the above said systems is different, as sewerage system of above said Mauzas jointly runs towards east through a joint pipe line, whereas the sewerage system of NA-156 runs towards west and north, in the same way, hence it is convenience of public at large that Mauza Qutab Pur, Jungle Khan Muhammad and Bakhar Arbi may be included in NA-157.
 - c) That some charge/circles of Union Council 62 (Qutab Pur) i.e. Circle 6 of Charge 17 of Mauza Qutab Pur, is already part of NA-

157, Noor Sultan Town, Shahbaz Town are also part of Union Council 62, the same have also been included in NA-157, whereas Circle 7, 8 & 9 of Charge 18 have been included in NA-156, thus an administrative unit i.e. Union Council 62 has been bifurcated, which is in violation of Section 20 of the Election Act, 2017.

- d) That Mauza Qutab Pur, Mauza Jungle Khan Muhammad Wala and Mauza Bakhar Arbi are the last boundary of proposed NA-156, the culture of the same is alike to the culture of NA-157, in Mauzas Qutab Pur, Jungle Khan Muhammad Wala and Bakhar Arbi, the people of the same homogeneity resides, whereas after Mauzas Qutab Pur and Bakhar Arbi in proposed NA-156 on its western side there starts territory of NA-154, which is consisted upon cantonment area etc, in order to approach Multan City, one has to cross the cantonment area, in this way, principle of homogeneity has not been maintained.
- e) That if one has to go to main road Old Shujad Road, Multan from Mauzas Qutab Pur, Jungle Khan Muhammad Wala and Bakhar Arbi, the same main road is situated at a distance of about 1½ kilometers, whereas when one has to go to NA-156, practically one has to cover the boundaries of NA-154, which is consisted of cantonment area, Multan and there are numerous Check Posts of Pakistan Army, from adjoining territory of NA 156 i.e. Gharib Abad etc. there is no vast and suitable approach, thus convenience wise the above said areas may be included with proposed NA-157.
- f) That if the objections of the petitioner are accepted, both the NAs remains compact.
- g) That presently the shape of NA-156 is odd, the same is like tailor made, which is not permissible under the law.
- h) That circle 05 of Charge 14 of proposed NA-157, is like a hill in NA-156, which is apparent from naked eye, in the same way, circle 6, 7, 8, 9 of Charge 14 (Mauza Seetal Marri) is also an

intrusion in NA-157, thus to maintain physical features have been violated.

- 4
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- i) That if Mauza Seetal Marri is included in NA-157, one has not to cross the natural boundaries i.e. Railway Lines as well as an old big canal.
 - j) That other developmental schemes of Mauza Seetal Marri are also common with territories of NA-157.
 - k) That at the time of delimitation of above said constituencies, compactness of the areas, physical features, existing boundaries, administrative units, facilities of communication, public convenience and homogeneity have not been adhered to, hence it is adviseable and in the fitness of things that objections of the applicant may be accepted.
 - l) That according to the recent delimitation at present the population of NA-157 is 7,74,683/- and population of NA-156 is 8,18,890/- and difference of population of both the NAs is 44,207/-.
 - m) That as required areas to be included in NA-157 were previously part of NA-148 (proposed NA-157), hence in the past developments schemes i.e. construction of roads etc. were made while treating the same part of one constituency, now by including the same in NA-156, all the development schemes shall be disturbed.
 - n) That circles 7, 8, 9 & 10 of Charge No.18 of NA-156 are requested to be included in NA-157, the total population of the above said circles is 38000/-, for the same charge for its circles i.e. 11, 12, 13, 14 & 15, the population of above said circles is 30,870, the population of Charge 14 for its circles 6, 7, 8, 9 is 50422/-, if all the above said populations are calculated, the same becomes 119,292, now the population which shall be included in NA-156 after the desired alterations i.e. charge 17 its circles 2, 3, 4, 5 and charge 26 its circle 5, 6 would become 99424.

- o) That even otherwise, delimitation process of NA-156 & NA-157 is void simply because of reason that population of circle 7 of Charge 26 has not been included either in NA-156 & NA-157, thus inhabitants of the locality have been deprived of from their basic right of vote, it would not be out of place to mention here that circle 7 of Charge 26 is consisted upon Sultan Pura etc, of which population is about 13000, under the law, such a large number of people cannot be deprived of from their right of vote, hence this objection petition.
- p) That now according to the requests of the applicant if the same are acceded to, the population of NA-157 would be 794,521 and NA-156 would be 799,022, thus now the difference of population is based upon rationale and logical.

Prayer:-

Under the above noted circumstances, it is therefore most respectfully prayed that objections be accepted and circles No.7, 8, 9, 10, 11, 12, 13, 14 & 15 of Charge No.18 and circles No.6, 7, 8, 9 of Charge No.14 may very kindly be excluded from proposed NA-156 further it would be included in delimitation of NA-157, in the same way, circles No.2, 3, 4, 5 of Charge No.17 and circle 5 & 6 of Charge No.26 may be excluded from delimitation of NA-157 and it be included in delimitation of proposed NA-156 to meet with the ends of justice

APPLICANT

Through:-

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Advocate Supreme Court,
TAHIR LAW ASSOCIATES
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Verified on oath that the contents of the objection petition are correct and true to the best of my knowledge