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BEFORE THE HONOURABLE SECRETARY ELECTION COMMISSION OF
PAKISTAN, ISLAMABAD.

Representation No. _____/2018

In the matter of delimitation of constituencies:-

Haji Khan Baig S/o Malik Khuda Bakhsh
(CNIC No.36303-0974180-7)
Mouza Mohammadpur Rawan Chah Zami Post Office 7/T,
Tehsil and district Multan

**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 157 AND
NA 158**

The petitioner respectfully submits as follows:-

That the instant representation is being filed by the petitioner Haji Khan Baig S/o Malik Khuda Bakhsh (herein referred to as the "applicant") voter member of National Assembly Constituency NA 157 AND NA 158 (proposed). So the applicant duly competent to file the instant representation under the law. Attested voter number slip of Applicant as Annexure-A.

2. Through this representation, the applicant seeks to challenge the preliminary proposal published by the Election Commission of Pakistan pertaining to the delimitation of the National Assembly Constituencies i.e. NA 158 AND NA 157 of district Multan (hereinafter referred as "The preliminary proposal"). The map of the preliminary proposal which was provided by

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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 06 National Assembly constituencies while proposal relates to numbering NA-154 to NA-159.

4. The preliminary proposal is in sheer violation of the statutory principles of delimitation as enshrined in section 20 of the Act while it is mandatory provision of law. Therefore 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 constituencies for general seats shall, as far as practicable, 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 and other cognate factors to ensure homogeneity 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 one constituency.
- (3). As far as possible, variation in population of constituencies of an `Assembly or a local government shall not ordinarily exceed ten percent.
- (4). If the limit of ten percent under sub-section (3) is exceeded in an exceptional case, 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.

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 off 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,

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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 the 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.

Suggestions/Proposals.

1. Patwar circle Chatha (Mouza Chatta and Muhammadpur Rawa) and Patwar circle Ghariala hereinafter referred as "PC-Chatha and Ghariala" total population 16162 taken out of NA-158 and be inserted into NA-157. (Highlighted on the map). Annexure "C"
Town committee Makhdoom Rasheed (old) hereinafter referred as "TC-MR" total population 14833 taken out of NA-157 and be inserted into NA-158. Moreover Union Councils remain intact. (Highlighted on the map).

(Highlighted on the map an Annexure-C).

That the proposed table of NA-157& NA-158 is as under:-

Sr. No.	NA	Population	Total	Remarks
1	PC-Chatta & Ghariala	16162	16162	The said area may be taken out of NA-158 and same be inserted in NA-157
2	TC-MR	14833	14833	The population may be taken out of NA-157 and same be inserted in NA-158

**GROUND FOR SUPPORTING THE SUGGESTED
AMENDMENTS.**

PHYSICAL/GEOGRAPHICAL

i). **PHYSICAL/GEOGRAPHICAL**

According to suggestion, the Area of PC- Chatta & Ghariala which have been inserted into NA-158 due to political influence while the said Area is the last boundary of NA-158 while these areas are contiguous with each other and Union Councils remain intact. Whereas the area of "TC-MR" is in the centre of NA-157 and NA-158, but due to the partition of Mouza Makhdoom Rasheed and in order to provide political benefit to a specific persons of the area. This area is included in NA-157 whereas from East to West the area of "PC- Chatta & Ghariala up to 10 Kilometer, there is constituency of NA-157 not in NA-158 which not justified. While the area of "PC- Chatta & Ghariala" is situated at one side of Vehari road and its population relates to the Multan City. In NA-157 total Area is in Tehsil Sadar, Multan while in NA-158 mostly Area is of Tehsil Shujabad and the people of Area "PC- Chatta & Ghariala" have deep physical and geographical impacts with NA-157. In this way communication links will be better in this way. Hence proposal is considerable.

ii) HISTORICAL/CULTURAL BACK GROUND.

Traditionally, historically, socially, culturally and geographically, Area and people of "PC- Chatta & Ghariala" have always remained aligned with the part of NA-157 and not of NA-158 and people of the area have affinity with each other and they will get better communications. Hence it is not justified that an area which always remained heart of Tehsil Sadar, Multan is attached with the area of Tehsil Shujabad and the setup of locality

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of the areas of local government /union councils Jalalabad and Chatta have been changed which is not justified and the same status with NA-158.

iii) Service/Communication.

Keeping in mind all five factors narrated in (ii) ibid the layout of service, road, network, revenue, policing, education, and health etc: were accordingly aligned and developed by Tehsil Saddar, Multan.

Areas suggested by the applicant be taken out from NA-158 and inserted into NA-157 have always remained the part of Tehsil Saddar Multan so the geographical compact of the area suggested by applicant is an alignment of NA-157. Whereas Areas "TC-MR" are near to NA-158 so Area of TC-MR is a geographically compact Area of NA-158.

(iv). It is pertinent to mention here that if the suggestion is accepted then union councils of Area TC-MR will become aligned as earlier and it would be beneficial for the people of the area.

People of the area have affinity with each other and they will get better communications with each other. Moreover change in population by insertion tradition has no significant change and population is almost same. And TC-MR has better link with NA 158 than NA157. TC-MR de-notified by the Government and this is the part of PC Makhdoom Rasheed Patwaar circle has broken which is against the law while in my proposal Patwaar circle remains intact.

Other cognate Factors.

v). That the suggestions made by the applicant have approximately equal population, area radius distance, notable revenue boundary, roads, police stations, width and length of the area of the constituency as well as the suitable approach to the central place of the constituency NA-157.

vi). That while preparing the NA-157 constituency, said committee violated the principles as laid down under section 20 of the election commission act 2017 as well as section 10 of the election Commission Rules 2017. The said rules and regulations while preparing both the delimitation of the consistency NA-157, & NA-158 violated the basic principle of dock-wise from north end to south.

5. According to the proposal of the applicant, the insertion of Area "PC Chatta & Ghariala" in NA-157 and insertion of Area" TC-MR" in NA-158 will not change the administrative boundary of the constituency. Union Councils remain intact and balance of population almost remains equal according to law. Comparative table has been elaborated above and comparative maps are also enclosed..

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

**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.**

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Humble Petitioner.

Haji Khan Baig S/o Malik Khuda Bakhsh
(CNIC No.36303-0974180-7)
Mouza Muhammadpur Rawan Chah Zami
Post Office 7/T, Tehsil and district Multan