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BEFORE THE ELECTION COMMISSION OF PAKISTAN
ISLAMABAD

Representation Petition No. _____ / 2018

Before:

The Secretary (ECP) Secretariat, Election House,
Constitution Avenue, G-5/2, Islamabad.

On behalf of:

Sajjad Ahmad son of Haji Tahir Ahmad Khan, resident of
Chak No.72-M, Post Office Chak No.73-M, Tehsil Jalalpur
Piranwala, District Multan

...Applicant/Petitioner

**REPRESENTATION UNDER SECTION 21(3) OF THE
ELECTION ACT 2017 READ WITH RULE 11 (4) OF THE
ELECTION RULES 2017 FOR THE DE-LIMITATION OF
THE PROPOSED CONSTITUENCY NO.NA-159 MULTAN IN
THE PRELIMINARY REPORT**

ABSTRACT

1. The Election Act 2017 parameters warrants PC "Basti Dad" (8387) be added into NA-159 and excluded from NA-158 and PC "Thatha Makhdoom Pur" Population:3457, be excluded/removed from NA-159 and added to NA-158.

2. The Union Council "Shah Musa", its major portion consists of UC "Shah Musa" which is in NA-159, whereas the remaining of the population of UC "Shah Musa" is PC "Basti Dad" which has the population 8387, has been proposed by Election Commission of Pakistan to be added in NA-158 in preliminary de-limitation, merits to be added in NA-159 in order to complete the homogeneity of the population of the UC "Shah Musa" the division is illogical and irrational.

3. Furthermore, the Patwar Circle "Thatha Makhdoompur" is part and parcel of Union Council "Jalalpur Khaki" and all the administration related issues are resolved through the offices of the administrative units situated in Jalalpur Khaki UC and as Jalalpur Khaki is in NA-158, therefore PC "Thatha Makhdoom Pur" is by natural division merits to be attached with UC "Jalalpur Khaki" resultantly to be made part of NA-158, hence this petition on the following grounds.


GROUNDS

Being the concerned voter and representative of the subject Constituency it is submitted as follows:

1. That the petitioner is enrolled as a voter in the constituency No.NA-159, Multan.
2. That the preliminary delimitation of constituencies has been published through public notice by the respondent. Copy of notice is attached.
3. That the preliminary delimitation of constituency No.NA-159, Multan is against law, facts, rules, procedures, principles and provisions as well as sections laid down in the delimitation Act 2017.
4. That there is gross violation of laws, rules, principles and sections of delimitation rules 2017.
5. That the delimitation of NA-159 along with NA-158 Multan is liable to be rectified to the extent of prayer of the petitioners to meet the ends of justice and to be in accordance with rules, provisions, laws sections laid down in the delimitation Act 2017.
6. The majority of the "Jalalpur Khaki" UC is in NA-158 while the minority of the Jalalpur Khaki is in NA-159, therefore, it would be appropriate that the both the "populous" be together in NA-158 to satisfy the parameter of "homogeneity".

7. That the road net-work, post offices, communication ways, education facilities and all medical facilities are accessible, approachable to the inhabitants of "Thatha Makhdoom Pur" through and in UC "Jalalpur Khaki" and as a result it is essential that "Thatha Makhdoom Pur" be attached with the Jalalpur Khaki for the public convenience and thus be added/included in NA-158.
8. That the contiguity of the locale of PC "Thatha Makhdoom Pur" is as such that it has geographically more abutting boundary adjacent to areas of NA-158. Therefore, its exclusion from NA-158 is unjustified and impracticable for the geographic as well as populous reasons. It would be worthy to mention that the only approach of the inhabitants of PC "Thatha Makhdoom Pur" towards its Tehsil Headquarter is through "Jalalpur Khaki" by sharing the common road network/link road, it is essential that the PC "Thatha Makhdoompur" be included in the NA-158 to create compact homogeneity with the "Jalalpur Khaki" to avail the road link.
9. That the administrative offices/police station also exercise authority on the area which includes "Jalalpur

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Khaki” as well as PC “Thatha Makhdoompur” being common areas, therefore, keeping them intact is more viable approach rather than separating them.

For the Inclusion of Basti Dad to be removed from NA-158 and to be added in NA-159.

10. The Union Council Shah Musa, its major portion consists of PC “Shah Musa” which is in NA-159 which has population of 12050, whereas the remaining of the population of UC “Shah Musa” is PC “Basti Dad” which has the population 8387, which has been proposed to be added in NA-158 merits to be added in NA-159 in order to complete the homogeneity of the population of the UC “Shah Musa” the division is illogical and irrational.
11. That the PC “Basti Dad” being a part of the UC “Shah Musa” as its administrative office other significant utilities and administrative offices, education, medical facilities are all with the UC “Shah Musa”, therefore, the Basti Dad merits to be attached with UC “Shah Musa” in NA-159.

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12. The contiguity of the PC "Basti Dad" is with UC "Shah Musa" and hence geographically they are being common area and population homogeneity abutting boundary of areas in NA-159.
13. That the public convenience which is the main parameter of the de-limitation warrants that the PC "Basti Dad" should be part of NA-159 as the affidavits of locals are annexed.
14. That there are no justifiable reasons to bifurcate administrative and populous division.
15. That the remaining four National Assembly constituencies of District Multan will remain intact.

PROPOSAL

- a. The Quota Per seat for the province of Punjab and existing population as per 2017 Census is given under:
 - i. Quota per seat = 7,80,000 with 10% plus minus.
 - ii. Existing Population of NA-159 = 771838
 - iii. Existing population of NA-158 = 756003

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- b. PC "Basti Dad" of Raja Ram QH comprising of Mauza "Basti Dad" and Mauza Khalar.
- c. PC "Thatha Makhdoom Pur" of Gunwen QH comprising of Muaza Taror Jalal Pur and Mauza Thatha Makhdoom Pur.
- d. Therefore the proposed exclusion of patwar circles "Thatha Makhdoom Pur" having population of 3457 presently is in NA-158 may be added in NA-159, and furthermore PC "Basti Dad" comprising of Mauza Basti Dad and Mauza Khalar having collectively population of 8387 being proposed to be added in NA-159 and be removed from NA-158, does not alter the population distribution of the constituencies; After the above-mentioned proposal the new population for NA-159 and NA-158 shall become;

i. Existing NA-No. 158 = 7,56,003

- By Exclusion of 8387 collective population of patwar circles "Basti Dad" and by addition of 3457 population of PC "Thatha Makhdoom Pur" which makes the population of NA-158 = 7,51,073, which falls within the quota.

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ii. Existing Population of NA-159 = 7,71,838

➤ By Addition of 8387 population of "Basti Dad" PC and by exclusion of population of 3457 collective population of PC "Thatha Makhdoom Pur" makes the population of NA-159 = 7,71,838 which falls within the Quota.

e. The above mentioned facts and grounds shall make the population distribution of the NA-158 and NA-159 as under:

NA No.	Proposed Population Distribution by Election Commission of Pakistan (ECP) for 2018 Election	Proposed/Suggested by The Applicants
158	7,56,003	7,51,073
159	7,71,838	7,76,768

PRAYER:


It is respectfully prayed that PC "Basti Dad" be included in NA-159 and PC "Thatha Makhdoom Pur" be made part of NA-158 to satisfy the parameters of De-Limitation. The population threshold remains within the parameters.

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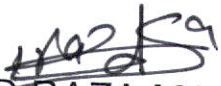
Any other equitable relief which this Honourable Court may deem fit and necessary may also be granted.

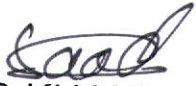

Petitioner

Through Counsel


(MALIK QAMAR AFZAL)
Advocate Supreme Court


(SYEDA SUMMERA NAQVI)
Advocate High Court


(AHMAD RAZA MANGAT)
Advocate High Court


(SAAD KHAN)
Advocate High Court

Dated: 30-03-2018