

3

BEFORE THE HONOR'BLE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD

Handwritten signature and date: 03/04/2018

REPRESENTATION No. _____/2018

Rohit Stephen s/o Stephen Akhtar resident of Khatkana Road, House No. 561/B/3-E/W-8M, Multan Cantt, Tehsil & Distt Multan

(PETITIONER)

REPRESENTATION UNDER SECTION 21(3) OF THE ELECTION ACT, 2017 READ WITH RULE 12 & 13 OF THE ELECTION RULES, 2017 FOR ALTERATION/MODIFICATION IN THE DELIMITATION OF CONSTITUENCY PP-213 MULTAN-III DISTRICT MULTAN

Respectfully Sheweth,

1. That the undersigned is registered voter of PP 213 OF Multan District. The vote of the Petitioner is registered in the Electoral List of Gul Nar Colony, Mohallah Ramzanabad at serial No. 208. The certified copy of the voter list is annexed herewith as **Annexure-A**.
2. That the according to the delimitation issued by the Honorable Election Commission of Pakistan, the area delimited for the purpose of PP-213 consists of following areas,
 - i. Multan Cantt. Of Multan Saddar Tehsil,
 - ii. Multan Cantt. Qanoongo of Multan City Tehsil excluding the following Patwar Circles:
 - A. Dorana Lagana
 - B. Piran ghaib
 - iii. The following Census Charges of Municipal Corporation Multan:
 - A. Charge No. 23
 - B. Charge No. 18
 - C. Charge No. 19

[Copy of the Map of PP-213 issued by Pakistan Bureau of Statistics, Multan Municipal Corporation is attached as **Annexure-B**]

3. That it is pertinent to mention that the constituency of PP-213 as per above mentioned Map comprising of area falls with the boundaries of Multan Cantonment, Multan Sadar Tehsil and Multan Municipal Corporation.

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4. That the delimitation of the PP-213 Multan III has been done in violation of the principles laid down in Section 20 of the Election Act, 2017. The relevant provisions of Section 20 are reproduced herein below for ready reference,
20. Principles of delimitation.—(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.
5. That the inclusion of area described in TABLE-I in the Constituency PP-213 Multan-III has not only disturbed the geographical compactness of the Constituency but Constituency is also without proper boundaries and thus the physical features of the Constituency is against the principles enshrined in Section 20 of the Act of 2017.
6. That the preliminary delimitation of the constituencies published by Election Commission of Pakistan will cause serious inconvenience to the public at large of District Multan, if same is not altered or modified in accordance with the provisions of the Election Act, 2017.
7. That the Petitioner is willing to propose a delimitation plan that is most suited in terms of Section 20 of the Elections Act, 2017.

PROPOSED PLAN

That the areas described in Table-I below have to be excluded from the PP-213 Multan-III and the Areas described in Table-II (presently falls in PP-214 may be included in PP-213 for the purpose of equality in population of the PP-213 and PP-214. The said adjustment would not only restore the compactness of the PP-213 but also would not disturb the compactness of PP-214. In this way, the boundaries of both provincial Constituency would be clearly marked and having proper physical features. In this regard, it is pertinent to mention that the population of the area described in Table-I which is proposed to be excluded from PP-213 is 27,129 whereas the area described in Table-II which is proposed to be included in PP-213 is 33,774 which means, the swapping of said areas between PP-213 & 214 would not disturb the distribution of population among the Constituencies. In this regard, the proposal for the entire District is annexed which shows that the said swapping of area between PP-213 and 214 would have no impact on other Constituencies of the entire District.

TABLE-I

Tehsil	Charge	Circle	Mouzas	Census Code	Population	Uc No.	UC Name
Multan City	Mutan Cantt	Taraf Mubarik Doim	Tarf Mubarik Doim	212010201, 212010204	6,747	69	Dorana Lagana

H/2020/12011 (5)

Multan City	Mutan Cantt	Taraf Mubarik Doim	Bua Pur	212010222, 212010223- 41	20,372	69	Dorana Lagana
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TABLE- II

Tehsil	Charge	Circle	Mouzas	Census Code	Population	Uc No.	UC Name
Multan City	6	7 to 11	Multan Corporation		33,735	67	Neel Kot

[Copy of the MAP showing the Proposal of the Petitioner are attached as **Annexure-C**]

8. That the above mentioned submissions are according to the principles of natural justice and fair play and also in accordance with Section 20,21 of Election Act 2017 and relevant Rules.

PRAYER

In view of what has been stated above, it is humbly prayed that the instant Petition may very kindly be accepted and the constituency PP 213 MULTAN may very kindly be delimited as proposed by the petitioner and in accordance with law.


Any other relief which this Honorable commission deems fit may also be granted in the supreme interest of the justice.



PETITIONER

THROUGH


BARRISTER MUHAMMAD UMAR RIAZ
ADVOCATE SUPREME COURT


SAQIB HANNON CHISHTI
LL.M (London)
ADVOCATE HIGH COURT