

(11)
BEFORE THE ELECTION COMMISSION OF PAKISTAN,
ISLAMABAD.

31/03/2018
T-5

Shoaib Iqbal son of Mohammad Younus Mohammad House No.14-V,
Block New Multan.

REPRESENTAION

**UNDER SECTION 21(3) OF ELACTION ACT 2017 READ WITH
RULE 12 OF ELECTION RULES 2017 REGARDING ALTERATIONS
OR MODIFICATIONS IN THE PRELIMINARY LIST OF
CONSTUTENCY PP215 MULTAN- V**

RESPECTFULLY SHEWETH,

1. That the petitioner is a voter of draft Constituency PP-215. The name and particulars of the petitioner stands against serial No. ²¹²⁰⁸⁰³⁰⁷ ~~212100201~~ of the voter list published circulated by Election Commission of Pakistan. H

(The operative part of the voter list is appended as **annex- A**)

2. The petitioner is aggrieved by the draft / proposed/new delimitation carried out by this Honorable Commission under the provision of Section 19 of Election Act, 2017 read with Rule 7 of Election Rules 2017 in respect of PP-215 Multan -V and seeks proposed delimitation in PP -215 by making minor amendment or modification in PP- 216 and PP-217 without inducing major changes in any constituency or other parameters of delimitation as prescribed by this honorable Election Commission.

12)

9/21/2018

3. That it is pertinent to mention that the modification or alteration mentioned in Para (Supra) are submitted following the principles of delimitation as laid down in Section, 20 of Election Act, 2017 , procedure and guide lines provided by this Hon'ble Commission in Election Rules 2017.

GROUND

- 1. That the new delimitation of PP-215 as published in preliminary report and preliminary list is against the provisions of Section 20 of the Election Act,2017 read with rule 10 and 12 of the Election Rules 2017
- 2. That as per scheme of new draft delimitation in PP-215 , the Statistical configuration and composition of PP-215 Multan -V Published or notified by this Honorable Election Commission is given herein below,

PP- 215 Multan -V

| | | | |
|--|-----------------|-----------------|------------------|
| Statistical configuration and composition/ delimitation of <u>PP-215 Multan -V</u> Notified by this Honorable Commission is given below | | | |
| Total Population retain in <u>PP-215 Multan -V=375720</u> consists of following Census Charges | | | |
| Charge No. 7 | Charge No. 8 | Charge No. 9 | Charge No. 10 |

(Photocopy of map PP-215 after delimitation is appended as **annex-“B”**)

| | | | | |
|---|-----------------|-----------------|------------------|-----------------------|
| Statistical configuration and composition/ delimitation of <u>PP-215 Multan -V</u> proposed by the petitioner is hereby given below, | | | | |
| Total Population retain in <u>PP-215 Multan -V</u> proposed by the petitioner = <u>376583</u> consists of the following Census Charges | | | | |
| Charge No. 7 | Charge No. 8 | Charge No. 9 | Charge No. 10 | Charge No. 11 |
| | | | | Circles 4, 5, 6, 7 |

(Photocopy of the map of PP-215 proposed by the petitioner is appended as **annex- “C”**)

3. That the Census Charge No. 7 has been added and been made part of the constituency which had never been part of the same since the last delimitation done in 2002, even it had never been part of the former

Provincial Constituency earlier to last delimitation. Further it is in violation of the principles that old constituencies must not be disturbed.

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4. That as per delimitation scheme of draft PP-215 the areas of (other constituencies like former PP- 194, PP-200 and , PP- 202 have been added without any justification and totally ignoring the principle that old constituency should be disturbed at least if it is inevitable.

5. That it is pertinent to mention that during the formation of the said draft constituency PP- 215 , the natural boundaries like railway lines banks of canals and other source of transportation and communication of the constituency ,the basic principles and rules of delimitation have been violated and ignored.

6. That the delimitation Committee neglected the irrefutable fact that Census Charge No. 11 (Circles No. 4, 5, 6) were naturally adjacent to PP-215 and the same must be the part of the constituency PP-215 in order to meet the true principles of delimitation.

7. That Census Charge No. 11 (Circles No. 4, 5, 6) are part and parcel of the constituency PP-215 and the same may graciously be included for the natural delimitation of the said constituency without any prejudice.

8. That maintaining the boundaries of District Multan and the delimitation of other Constituencies adjacent to PP- 215 drawn and drafted by the delimitation committee the following proposals in respect of delimitation of Constituencies of PP- 216 Multan-VI and PP-217 Multan-VII are submitted herein below,

PP- 216 Multan –VI

Statistical configuration and composition/ delimitation of PP-216 Multan –VI Notified by this Honorable Commission is given below

Total Population retain in **PP-216 Multan –VI=365308** consists of following Census Charges and circles

| Charge 10 | Charge 11 | Charge 12 | Charge 13 | Charge 20 | Charge 21 | Charge 22 | Charge 24 | Charge 25 |
|--------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|
| Circles 5, 6 | ----- | ----- | ----- | ----- | ----- | ----- | ----- | ----- |

(Photocopy of map PP-216 after delimitation is appended as **annex-“D”**)

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5/31/2019

| | | | | | | | | |
|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| Statistical configuration and composition/ delimitation of <u>PP-216 Multan –VI</u> proposed by <u>the petitioner</u> is given below | | | | | | | | |
| Total Population retain in <u>PP-216 Multan –VI=360018</u> consists of following Census Charges and circles | | | | | | | | |
| Charge 7 | Charge 11 | Charge 12 | Charge 13 | Charge 20 | Charge 21 | Charge 22 | Charge 24 | Charge 25 |

Modification / Change prayed for – Charge No. 10 (Circles 5, 6) may be excluded and Charge NO. 7 may graciously be included in delimitation of the Constituency PP- 216 (VI)

(Photocopy of map of PP- 216 (VI) Multan proposed by the petitioner is appended as annex- “E”)

PP- 217 Multan –VII

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|---|--------------|--------------|--------------|--------------|
| Statistical configuration and composition/ delimitation of <u>PP-217 Multan –VII</u> Notified by this <u>Honorable Commission</u> is given below | | | | |
| Total Population retain in <u>PP-217 Multan –VII=371665</u> consists of following Census Charges and circles | | | | |
| Charge 13 | Charge 14 | Charge 15 | Charge 16 | Charge 17 |

(Photocopy of map PP-217 after delimitation is appended as annex-“F”)

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|---|--------------|--------------|--------------|--------------|
| Statistical configuration and composition/ delimitation of <u>PP-217 Multan –VII</u> proposed by the petitioner is given below | | | | |
| Total Population may be retained in <u>PP-217 Multan –VII=376172</u> consists of following Census Charges and circles | | | | |
| Charge 10 | Charge 14 | Charge 15 | Charge 16 | Charge 17 |
| Circles 5 & 6 | ----- | ----- | ----- | ----- |

Modification / Change prayed for – Charge No. 13 may be excluded and Charge NO. 10 (Circles 5,6) may graciously be included in delimitation of the Constituency PP- 217 (VII)

(Photocopy of map of PP- 217 (VII) Multan proposed by the petitioner is appended as annex- “G”)

9. That the delimitations of the constituencies have not been done as mentioned in rule 10(5) of the Election rules 2017 according to which 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

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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. Hence the requirement of law has been disregarded during the course of delimitation of the said Constituency PP-215.

01/02/2018/13/18

PRAYER

In the light of the above humble submissions , it is respectfully prayed that proposed minor alteration, modification and changes may kindly be accepted and the boundaries /delimitation of PP-215 may kindly be adjusted and approved by inducing Census Charge No. 11 (Circles No. 4, 5, 6) in delimitation of PP-215 as requested in Para 7 of the instant representation.

Any other relief which this Honorable Commission deems appropriate may also be granted to the petitioner in vital interest of justice.

Dated 30.03.2018

Shoaib

Humble Petitioner

Shoaib Iqbal S/o Muhammad Yousnas
New Multan. Through Makhdum Azhar Hussain Shah Advocate.
District Court Multan.

Azhar