

2-

Q

THE HONORABLE SECRETARY, ELECTION COMMISSION
OF PAKISTAN

Representation No. _____/2018

On behalf of:

Rao Abdul Qayyum S/o Rao Ejaz Ahmed, resident of Basti Kamal Pur, P.O. Qadirpur Lal Peer Tino, Tehsil and Distt. Multan

Subject: OBJECTIONS / REPRESENTATION TO THE DRAFT PROPOSALS FOR DELIMITATION OF CONSTITUENCIES UNDER PARA NO.35 OF ITS NOTIFICATION NO. F.8(3)/2018 ELECTION DATED 5TH MARCH, 2018 ISSUED FROM THE OFFICE OF THE ELECTION COMMISSION OF PAKISTAN, ISLAMABAD UNDER SECTION 21(3) OF THE ELECTION ACT, 2017 READ WITH RULE-11 (4) OF THE ELECTION RULES, 2017 FOR THE DELIMITATION WITH REGARD TO CONSTITUENCY NOS. PP-220 (X) AND PP-219 (IX) MULTAN BEING IMPROPER CONTRARY TO THE REAL POSITION AT SPOT AND FOR AMENDMENT AND MODIFYING THE SAME.

Respectfully Sheweth,

1. That the representative is the resident of Mouza resident of Basti Kamal Pur, P.O. Qadirpur Lal Peer Tino, Tehsil and Distt. Multan being public representative of the Constituency mentioned above. Copy of voter list is annexed as R/1.
2. That as per different paras of the above notification being annexed as R/2, the Honorable Election Commission of Pakistan has really performed its responsibility wisely, honestly, justly, fairly in order to conduct to near future general elections of Provincial Assemblies and National Assembly of Parliament of Pakistan.

3. That while issuing the aforesaid notification, inadvertently some illegalities and irregularities have been made which are required to be removed through amendments on the following grounds:

GROUND:

- A. That the petitioner is enrolled as a voter in the constituency PP-220 (X) Multan.
- B. That every authority is required to act as per law and to facilitate the public instead of creating hurdles, difficulties and problems, as such, the required amendments and modifications are liable to be made in the aforesaid Notification.
- C. That the delimitation of PP-220(X) along with PP-219 (IX) Multan is liable to be rectified to the extent of prayers of the petitioner to meet the ends of justice and to be in accordance with rules, provisions, laws, sections laid down in the delimitation Act, 2017.

The following Patwar Circle of PP-219:

S.No.	Patwar Circle of Mubarkpur Qanoonghoi	Population
1.	Mubarakpur	11,760
2.	Jehanpur	19,135
3.	Makhdoompur	5,558
4.	20 MR	7,347
	Patwar Circle of Makhdoom Rasheed-II Qanoongoi	
5.	19 MR	9,975
6.	16 MR	7,566
7.	12 MR	12,814
Grand Total:		74,182



Collectively having population of 74,182 be excluded from PP-219 and included in PP-220.

The following patwar Circle of PP-220:

S.No.	Patwar Circle of Qasba Qanoonghoi	Population
1.	Kotla Reham Ali Wala	12,983
2.	Billi Wala	13,346
3.	Kabeer Pur	8,446
4.	Baqir Pur	10,669
5.	Gobal Pur	6,820
6.	Qasba Awal	18,630
Grand Total:		70,894

Collectively having population of 70,894 be excluded from PP-220 and included in PP-219

Existing population of PP-219 Multan (IX): **361,091**
Existing population of PP-220 Multan (X): **347,713**

That if the above mentioned facts and grounds shall make the population distribution of PP-219 and PP-220 as under:

PP No.	Proposed Population Distribution by Election Commission of Pakistan (ECP) for 2018 Election	Proposed / Suggested by the applicant
PP-219	361,091	357,803
PP-220	347,713	350,991

D. That as per challenged Notification, old Qanoongoi Mubarakpur has been broken which law does not permit, as provided in Rule-10 of Election Rules, 2017, the broken of QH is only permitted in circumstances, where the question of population cross the limits of voters determined for a constituency, which question is not involved in case in hand, as such, said notification is liable to be amended and modified reasonably.

- E. That by modifications and amendment of questioned delimitation Notification total number of voters do not exceed as per law and particularly voters of Qanoongi Mubarakpur and Qanoongi Makhdoom Rasheed-II will be facilitated.
- F. That the electricity grid station of the area in PP-220 WAPDA office, SNGPL offices, the complaint offices are in PP-220.
- G. That since last two decade these areas of Mubarakpur Qanoongi remain in PP-220.
- H. That the clock wise movement of the Constituency for delimitation is also being violated as in accordance to the ECP Rules and Laws said people of charge / areas merit to be included / excluded in the proposed in the proposed PP-220.
- I. That as proposed and suggested above through this representation, all the requirements and principles of delimitation as provided under section 09 of Delimitation of Constituties Act, 1974 No. XXXIV of 1974 and section 20 of Elections Act, 2017, like distribution of population in geographically compact area, physical feature, existing boundaries of administrative unit, facilities communication and public convenience and other factors to ensure homogeneity in the creation of constituency are met with, as such, necessary modifications are liable to be made.
- J. That the draft proposal made by the representative is purely based upon law and in consonance with the scheme, theme and wisdom of Election Commission of Pakistan as categorically

expressly enshrined in the ab-initio of challenged delimitation notification as mentioned above.

K. That the netshell of the above grounds and proposals are culminated as follows:

PROPOSALS

The following Patwar Circle of PP-219:

S.No.	Patwar Circle of Mubarkpur Qanoonghoi	Population
1.	Mubarakpur	11,760
2.	Jehanpur	19,135
3.	Makhdoompur	5,558
4.	20 MR	7,347
	Patwar Circle of Makhdoom Rasheed-II Qanoongoi	
5.	19 MR	9,975
6.	16 MR	7,566
7.	12 MR	12,814
Grand Total:		74,182

Collectively having population of 74,182 be excluded from PP-219 and included in PP-220.

The following patwar Circle of PP-220:

S.No.	Patwar Circle of Qasba Qanoonghoi	Population
1.	Kotla Reham Ali Wala	12,983
2.	Billi Wala	13,346
3.	Kabeer Pur	8,446
4.	Baqir Pur	10,669
5.	Gobal Pur	6,820
6.	Qasba Awal	18,630
Grand Total:		70,894

Collectively having population of 70,894 be excluded from PP-220 and included in PP-219

Existing population of PP-219 Multan (IX):	361,091
Existing population of PP-220 Multan (X):	347,713



That if the above mentioned facts and grounds shall make the population distribution of PP-219 and PP-220 as under:

PP No.	Proposed Population Distribution by Election Commission of Pakistan (ECP) for 2018 Election	Proposed / Suggested by the applicant
PP-219	361,091	357,803
PP-220	347,713	350,991

L. That as per requirements of the representation, prepared maps and marked maps are annexed herewith as Annexure-R/3.

PRAYER:

In view of the above, it is prayed that by accepting this representation, proposed draft may be accepted and modification and amendment may accordingly be ordered to be made in terms that the Qanoongoi Mubarakpur PCs Mubarkpur, Jehanpur, Makhdoompur, 20 MR and PCs of Qanoongoi Makhdoom Rasheed-II Chak 19 MR, 16 MR, 12 MR may kindly be excluded from PP-219 and included in PP-220 and PCs of Qasba Qanoongoi Kotla Reham Ali, Billi Wala, Qabeer Pur, Baqir Pur, Gopal Pur and Qasba Awal may kindly be excluded from PP-220 and included in PP-219, which is in the interest of justice. Alternate remedy is also prayed for.

Representative
Rao Abdul Qayyum

Through:
Counsel

KHAWAJA SHAHID RASOOL SIDDIQUI
Advocate High Court