

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:

Malik Niaz Ahmed s/o Malik Abdul Kareem, resident of basti
zaildar wali mochi punoyan, 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.PP-221 AND PP-222 AND
PP-223 MULTAN IN THE PRELIMINARY REPORT**

ABSTRACT

The Election Act 2017 parameters warrants PC "Jalal Pur
Khaki" (17,860) and PC "Thatha Makhdoom Pur" of QH
Gawan, having population of 3457 be excluded/removed from
PP-222 and added to PP-221. PC "Narol" having population of
14206 of Ghazi Pur QH be excluded from PP-223 and
included in PP-222. The QH Gawan has the NA-159 has within

its ambit PC "Thatha Makhdoom Pur" and PC "Jalal Pur Khaki" in NA-158 and PC "Thatha Makhdoom Pur" in NA-159. It is to mention that complete PP-222 is within NA-159 except PC "Jalal Pur Khaki" and therefore it is essential that for geographical homogeneity the PC "Jalal Pur Khaki" should be included in PP-221 in order to balance the co-relationing between NA and PP seats. It would be relevant to mention that the presence of PC Jalal Pur Khaki in PP 222 has resulted in disturbance because of four PP seat being under NA-158 which is strikingly different from the rest of district Multan, where none of the NA seats have more than three PP seats either complete or partial under them. Removing PC Jalal Pur Khaki from PP-222 to PP-221 will restore balance of not more than three MPs under one NA constituency of District Multan.

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.

That since PC "Thatha Makhdoom Pur" is part and parcel of UC "Jalal Pur Khaki" if PC "Jalal Pur Khaki" is added to PP-221 then subsequently PC "Thatha Makhdoom Pur" should also be added to PP-221 for the following reasons:

REASONS

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

- a. That the petitioner is enrolled as a voter in the constituency No.NA-22 Multan.
- b. That the preliminary delimitation of constituencies has been published through public notice by the respondent. Copy of notice is attached.
- c. That the preliminary delimitation of constituencies NOs.PP-221,PP-222 and PP-223, Multan is against law, facts, rules, procedures, principles and provisions as well as sections laid down in the delimitation Act 2017.
- d. That there is gross violation of laws, rules, principles and sections of delimitation rules 2017.
- e. That the delimitation of NA-222 along with PP-221 and PP-223 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.

- f. Because of administrative joint through the offices of administration situated in UC "Jalalpur Khaki".
- g. 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.
- h. That the administrative offices/police station also exercise authority on the area which includes "Jalalpur Khaki" as well as PC "Thatha Makhdoompur" being common areas, therefore, keeping them intact is more viable approach rather than separating them.
- i. That since PC "Thatha Makhdoom Pur" (3457) along with PC "Jalalpur Khaki" (17860) is removed from PP-222, the deficiency becomes 21,317 and the net population of PP-222 goes down to 3,28,755 from 3,50,072. Since it is below the ten percent threshold(therefore, it is proposed that PC "Narol" population (14206) which is a complete UC should be included in PP-222 by excluding from PP-223 for the following grounds:

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GROUNDS

- i) The PC is natural link and natural land mark. The Narol PC----- would suggest that the UC Narol comprising of one PC Noral is an integral part of PP-222 as the local inhabitants/population within this PC has homogeneity, association/affiliation and inter-linked with population of PC of Shah Pur Lamah. As they being the part of same QH and the division of the QH is unjustified. Because the requirements of zig zag bifurcation from the Narol East to South is being not rightly satisfying unless and until the UC Narol is included into PP-222.
- ii) The Affidavits of the local inhabitants of the UC (Narol) itself would suggest that the local inhabitants are more keen and willing to join PP-222 for the reasons marriages, baradarism etc. for their utility convenience.
- iii) The proposals of exclusion of PC Jalalpur Khaki and PC Thatha Makhdoom Pur and inclusion of PC Narol will balance the population of the three

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constituencies and will maintain the balance of all three constituencies of PP-221, PP-222 and PP-223.

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 = 370,412 (110,012,442/297)**
with 10% plus minus (range being between 333,371 & 407,453)
- ii. **Existing Population of PP-221 = 3,56,839**
- iii. **Existing population of PP-222 = 3,50,072**
- iv. **Existing population of PP-223 = 3,70,638**

Therefore the proposed exclusion of PC "Jalal Pur Khaki" having population of 17,860 and PC "Thatha Makhdoom Pur" having population of 3457 be excluded/removed from PP-222 and added to PP-221 of QH Gawan. PC "Narol" having population of 14,206 of Ghazi Pur QH be excluded from PP-223 and included in PP-222

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and furthermore QH Gunwan PCs of Tehsil Shujabad comprising of Jalalpur Khaki & Thatha Makhdoom Pur having collectively population of 21,317 being proposed to be added in PP-221 and be removed from PP-222 alongwith PC Narol of QH Ghazipur of Tehsil Jalalpur Pirwala having population of 14,206 does not alter the population distribution of the constituencies; After the above-mentioned proposal the new population for PP-221, PP-222 & PP-223 shall become;

i. Existing Population of PP-221 = 3,56,839

- By Inclusion of collective population of patwar circles Jalalpur Khaki & Thatha Makhdoom Pur and by adding the population 21,317 of Mouzas Jalalpur Khaki, Seri, Khas Punjani, Taror Jalalpur & Thatha Makhdoom Pur makes the population of PP-221 = 378,156 which falls under the quota

ii. Existing Population of PP-222 = 3,50,072

- By Reducing Population of 21,317 of Mouzas Jalalpur Khaki, Seri, Khas Punjani, Taror Jalalpur & Thatha Makhdoom Pur of QH Gunwan PCs of

Jalalpur Khaki and Thatha Makhddom Pur of Tehsil Shujabad and by addition of 14,206 Population of Mouzas of Narol & Baith Kaich Shumali of QHs Ghazipur PC Narol of Tehsil Jalalpur Pirwala makes the population of PP-222= 342,961 which falls within the Quota

iii. Existing population of PP-223 = 3,70,638

By Reducing Population of 14,206 Mouzas of Narol & Baith Kaich Shumali of QHs Ghazipur PC Narol of Tehsil Jalalpur Pirwala makes the population of PP-223 356,432 which falls within the Quota

b. The above mentioned facts and grounds shall make the population distribution of the PP-221, PP-222 and PP-223 as under:

PP No.	Proposed Population Distribution by Election Commission of Pakistan (ECP) for 2018 Election	Proposed/Suggested by The Applicants
221	3,56,839	378,156

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222	3,50,072	342,961
223	3,70,638	356,432

PRAYER:

In these circumstances, it is respectfully prayed that the suggestions/proposal for the inclusion/exclusion of PCs be granted as prayed:

- a) PC Jalal Pur Khaki and PC Thatha Makhdoom Pur be added into PP-221 from PP-222.
- b) Narol PC be excluded from PP-223 and added in PP-222.

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

Petitioner

Through Counsel

(MALIK QAMAR AFZAL)
NAQVI)
Advocate Supreme Court

(SYEDA SUMMERA
Advocate High Court

(AHMAD RAZA MANGAT)
Advocate High Court
Dated: 30-03-2018

(SAAD KHAN)
Advocate High Court