1. That the petitioner is a permanent resident of Delhi and her name is also included in the Electoral Roll, 2007.
2. That Election for Municipal Councillors for the Municipal Corporation of Delhi were declared to be held on 5th April, 2007.
3. That the petitioner contested the election on the Ticket of Indian National Congress, party, the respondent No.3 contested her election on the B.J.P. Ticket, respondent No.4 contested election on the ticket of Bahujan Smajwadi Parti, the respondent No.5 contested election on the Ticket of National Congress Party, while remaining candidates contesting election on independent tickets. Respondents No.4 to 12 are Performa respondents, and no relief is claimed against them.
4. That on thoroughly going through the key-plan of the Pocket A-8, there are only 120 plots were carved by the Delhi Development, in Sector 16, Rohini, Delhi. But in the Electoral Roll, 2007 for the Ward 21, 660 plots/ properties have been mentioned, each having 60 square meters area. Thus, there have been shown over and above 540 plots. Further, in the same Sector, in Pockets C-4, and C-5, 184 plots have been shown. Besides this, in Pocket B-4, plot Nos.107 have been shown in the Electoral Roll, 2007. The true fact are that there are no pocket C-4, C-5 and B-4 in the Sector No.16, Rohini, Delhi. 831 more plots have shown in Sector 16.
5. That on each plot, the structure is raised upto third floor, First Floor, Second Floor and Third Floor, which shows that there are 3324 properties/floors more have been shown in the total plots of 831, whereas the aforementioned plots/properties are not existing in the Pockets C-4, C-5 and E-4, Sector 16, Rohini, Delhi, and the same have falsely been mentioned in the list.
6. That in furtherance malafide intention, in the aforementioned false properties numbering 3324, numerous false voters have also been shown, on whose behalf, base votes have been casted on the day of the election, i.e. 5.4.2007.
7. That the petitioner, on several occasions, approached the defendant/respondent No.1 for checki9ng the activities of the activities of the respondent No.3, but it did not care for the requests of the petitioner and turned a deaf ear to her requests. When the petitioner found that the respondent No.1 was not caring for the requests of petitioner, hence she submitted a written complaint dated 4.4.2007 with request for taking action against the respondent No.1 in pursuance of the provisions of law. But the respondent did not care for the same.
8. That on 16.4.2007, the petitioner further submit a complaint dated 16.4.2007 in pursuance of her complaint for conducting fair inquiry in the matter, against the respondent No.3. It is submitted that the petitioner also submitted a letter dated 4.4.2008 to the respondent No.1 for the use of vehicles in the canvassing with which the goods are transported, but the concerned officials did not care for the requests of the petitioner and the dumped her complaints for the reasons best known to the respondent No.1. The vehicles used bear Nos. DL-1LH-4732 and Qualis No.DL-1VB-2176.
9. That for the reasons mentioned above, the respondent No.3 has violated the directions/instructions circulated by the respondent No.1 openly for her ill-motive for which the respondent No.3 should be prosecuted and punished as per provisions of law, but the respondent Nos. 1 and 2 did not care for the same and closed their eyes from the side of the respondent No.3. Had the respondents No.1 and 2 vigilant and active for initiating a stern action against the respondent No.3, she would have not won the election at all.
10. That the candidates of the election ere not allowed the advertisements of their the motor vehicles but the respondent No.3 freely used vehicle in her advertisement/publicity, without a hitch.
11. That the respondent No.3 also opened her two publicity offices, whereas she should have to daily used one office for the said purpose, but she has not acted upon the directions. The respondent No.3 caused several other irregularities.
12. That the respondent No.3 used two offices for publicity/canvassing the election for herself. She also used more than two hordings of her photographs, which is clear from the photographs filed herewith. The respondent used bigger hordings of her photographs than the six ft. (6ft. x 4ft.). The respondent also used more tables and chairs on 5.4.2007, the day of the election that too at lesser distance of 100 feet. The respondent No.3 also violated the directions by using poster, banners, sticker and Jhandis/flags. She has also spent more than Rs.200000/- for publicity/canvassing. The respondent No.3 has also used Loud speaker on auto-rickshaw, used for transportation of goods for her publicity/canvassing during election.
13. That for the aforementioned reasons, the respondent No.3 has violated the conditions/directions/instructions of the Election Commission openly for canvassing/publicity for her election.
14. That the petitioner has submitted/deposited a sum of Rs.3000/- with respondent No.2/M.C.D. for filing this petition in the court.
15. That the election was held within the National Capital Territory of Delhi, where the cause of action has arisen for filing he present petition, hence this Hon’ble Court has jurisdiction to entertain and decide this petition. Petition is filed within limitation.

It is, therefore, respectfully prayed that the Election dated 5.4.2007 for the election of Municipal Councillor for Ward No.21 may kindly be declared as null and void.

Any other or order/relief in favour of the petitioner and against the respondent No.1 to 3 may also be passed in the interest of justice.