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M/10/2018
21/2/18

BEFORE THE ELECTION COMMISSION OF PAKISTAN

Representation under Section 21 of the Elections Act 2017 read with Rule 12 of the Election Rules 2017 in respect of the delimitation of constituencies of National Assembly Provincial Assembly of District Okara with specific regard to NA-142 and NA-143

It is respectfully submitted as under;

1. The petitioner is a permanent resident and voter of NA-143 Okara and was previously part of NA-146 (which has been renumbered as NA-142). He has been continuously living in this area for the past many years and belongs to a respectable family having strong social and economic ties to the surrounding area.
2. That through the delimitation process pertaining to the NA-142 constituency and on the basis of the Preliminary Delimitation Report 2018 published by this Hon`ble Commission on 05-03-2018, whereby the NA-142 Constituency has been delimited in the following manner;
 - a. Akhtarabad QH of Renala Khurd Tehsil.
 - b. The following QH's of Depalpur Tehsil;
 - i. Depalpur-I.
 - ii. Depalpur-II.
 - iii. Hujra-I.
 - iv. Shergharh
 - v. Vandala Jagir
 - vi. Pipli Pahar
 - vii. Depalpur-MC.
 - viii. Hujra-MC.

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3. That through the delimitation process pertaining to the PP-186 constituency and on the basis of the Preliminary Delimitation Report 2018 published by this Hon`ble Commission on 05-03-2018, whereby the NA-143 Constituency has been delimited in the following manner;

(a) Depalpur Tehsil excluding the following ;

1. Depalpur-I QH
2. Depalpur-II QH
3. Hujra-I
4. Shergarh QH
5. Vandala Jagir
6. Pipli Pahar
7. Depalpur MC and
8. Hujra MC

Of District Okara

The constituencies as preliminarily delimited by the ECP are attached as Annexure "A".

4. That through the instant representation, the petitioner seeks the indulgence of this Hon`ble Commission to delimit the above constituencies in the following manner;

Sr. #	No and Name of Constituency	Proposed amendments, alterations and/or modifications of the Constituency	Total Population
1.	NA-142	<p>a. Akhtarabad QH of Renala Khurd Tehsil.</p> <p>b. The following QH's of Depalpur Tehsil;</p> <ol style="list-style-type: none">i. Depalpur-I.ii. Depalpur-II.iii. Shergarhiv. Vandala Jagirv. Pipli Paharvi. Koeeki Bahawal <p>c. The following PCs of Hujra QH-I;</p> <ol style="list-style-type: none">i. Awan Kalanii. Sani Wall <p>d. The following PC of Hujra QH-II;</p>	754,828

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		i. Bahloolpur e. Dipalpur MC Of District Okara	<i>MADAN 21/3/18</i>
2.	NA-143	(a) The following QHs of Dipalpur Tehsil (i) Basirpur QH (ii) Khullyana QH (iii) Haveli QH (iv) Jamal Kot QH (v) Jehangirabad QH (vi) Mandi Ahmadabad QH (b) Hujra QH-I except for; (i) Awan Kalan PC (ii) Sahiniwal PC (c) Hujra QH-II except for (i) Bahloolpur PC (d) MC Mandi Ahmadabad (e) MC Basirpur (f) MC Haveli Lakha (g) MC Hujra Shah Mukeem Of District Okara	752,352

It is pertinent to note that the Delimitation Map as proposed by the Petitioner is attached as Annexure B and the areas to be included in NA-142 and excluded from NA-143 are highlighted in green colour and the areas to be excluded from NA-142 and included in NA-142 are highlighted in pink colour.

5. That it is pertinent to mention here that the Petitioner does not seek any amendment or alteration in the remainder of National Assembly seats of District Okara numbered as NA-141, and NA-144. Certification of voter list of petitioner is attached as Annexure "C"

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6. That being aggrieved with the part of list of the constituencies published in the Preliminary Delimitation Report 2018, the Petitioner seeks the indulgence of this Hon`ble Commission for making amendments, alterations, or modifications as suggested/proposed by the Petitioner on the following grounds;

GROUNDS

- A. That it is respectfully submitted that the Preliminary Delimitation Report with regard to the NA-142 and NA-143 has failed to adhere to the principles and procedures of delimitation as provided in S. 20 of the Elections Act 2017 read with Rule 10 of the Election Rules 2017 and therefore there is a need to re-visit the said delimitations proposed by this Hon`ble Commission
- B. That while preparing the delimitation report for the proposed constituencies NA-142 and NA-143 the Delimitation Committee omitted from NA-142 the area comprising of Koeeki Bahawal QH made the said area of NA-143. It is pertinent to mention here that Koeeki Bahawal QH has always remained part of NA-142 (previously NA-146) for the past 40 years as it has strong nexus to MC Depalpur and due to the the guiding factors of delimitation such as geographical compactness, facilities of communications and public convenience. Furthermore Koeeki Bahawal QH is in close proximity to Dipalpur MC and it is convenient for the public at large that the said QH be included in NA-142.
- C. That in order to equalize the distribution of population and in alignment with the principles of delimitation, the petitioner proposes and suggests that Hujra MC may be detached from NA-142 and be included in NA-143 as being an urban area, the voters of Hujra MC will be conveniently linked with NA-143 and due to facilities of communications and linkages, compactness of constituencies would be maintained. It is pertinent to mention here that Hujra MC has been part of NA-147 (now NA-143) prior to the General Elections held in 2012.
- D. That as earlier pointed out, the Koeeki Bahawal QH is attached to the urbanized area of Depalpur MC, in terms of facilities of communication

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and public convenience and thus in order to ensure homogeneity, it is imperative that the said Koeeki Bahawal QH is not separated from the NA-142 constituency, as proposed in the Preliminary Delimitation Report.

- E. That the addition of the Koeeki Bahawal QH in NA-142 in conjunction with the addition of Awan Kalan PC and Sahiniwal PC of Hujra QH-I and Bahloolpur PC of Hujra QH-II to NA-142 will balance the population of both the NA-142 and NA-143 constituencies while keeping a geographically compact shape of the constituency and will be far more convenient for the voters of the identified areas to be part of the respective proposed constituencies.

- F. It is emphasized that generally and urbanized MC, served as the nucleus around with major rural areas is attached to for the purposes of convenience and mobility therefore since Koeeki Bahawal QH is in closer proximity to Dipalpur MC than any other urbanized centre, therefore the proposed delimitation through this Petition may kindly be accepted.

- G. That if the proposal for delimitation of NA-142 and NA-143 made by the Delimitation Committee in its Preliminary Delimitation Report 2018 is finalized without incorporating amendments, alterations, or modifications proposed/suggest by the Petitioner in paragraph 4 above, the entire population of Koeeki Bahawal QH would suffer irreparable loss and hardships.

- H. That it is respectfully submitted that it is a paramount principle of delimitation that the process must take into regard of the distribution of population in geographically compact areas, existing boundaries of administrative units, facilities of communications and public convenience and other cognate factors to entire homogeneity in the creation of constituencies; the proposed delimitation in para 4 takes into account all these factors into account which have been omitted in the Preliminary Delimitation Report.

- I. That the amendments, alterations or modifications proposed/suggested by the Petitioner in paragraph 4 above are for the sole purpose of

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providing facilities and to provide ease to the inhabitants of the said areas.

In view of the foregoing, it is most respectfully prayed that the instant representation may kindly be accepted and the amendments, alteration, or modifications proposed/suggested by the Petitioner in paragraph 4 of this representation with respect of NA-142 and NA-143 may kindly be incorporated in the final report and list constituencies showing the areas included in each constituency as stated.

Any other relief which this Hon`ble Commission may deem just and appropriate may also be granted to the Petitioner in the interest of law, justice and equity

Petitioner 

Sardar Noshir Khan Wattoo

S/o. Sardar Rauf Hussain Wattoo

CNIC No. 35202-1506731-9

Resident of Koeeki Bahawal,

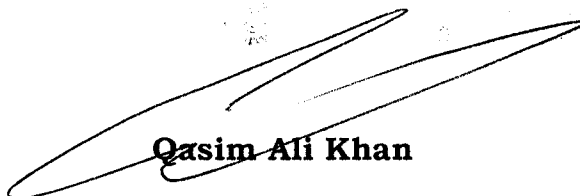
Tehsil Dipalpur, District Okara

Through



Muhammad Kamran Siddique

Advocate High Courts



Qasim Ali Khan

Advocate High Courts