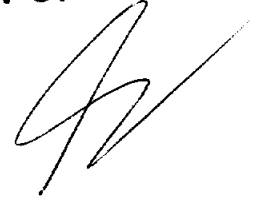


BEFORE THE ELECTION COMMISSION OF PAKISTAN  
THROUGH SECRETARY ELECTION COMMISSION OF  
PAKISTAN, ISLAMABAD.



REPRESENTATION

UNDER RULE 12 OF CONDUCT OF  
ELECTION RULES 2017, AGAINST THE  
PUBLICATION OF PRELIMINARY  
PROPOSAL REGARDING NATIONAL  
ASSEMBLY CONSTITUENCIES OF  
DISTRICT SAHIWAL NA-147 TO NA-149,  
ON BEHALF OF:

- (1) CH. MUHAMMAD SARWAR S/O CH. ABDUL HAQ  
RESIDENT/ VOTER OF CHAK NO.90/6-R,  
TEHSIL AND DISTRICT SAHIWAL.
- (2) MUHAMMAD NAEEM SARWAR RAMAY S/O  
MUHAMMAD SARWAR RAMAY, RESIDENT /VOTER  
OF CHAK NO.91/6-R, TEHSIL AND DISTRICT  
SAHIWAL.
- (3) AHMAD RAZA AKRAM SON OF CH. MUHAMMAD  
AKRAM, RESIDENT/VOTER CHAK NO.97/6-R,  
TEHSIL AND DISTRICT SAHIWAL.
- (4) MAZHAR HUSSAIN SON OF AHMAD, RESIDENT/  
VOTER OF CHAK NO.133/9-L (PC 102/9-L),  
TEHSIL & DISTRICT SAHIWAL

Respectfully sheweth;


1. Brief facts of the matter are that the  
petitioner No.1 is a voter enrolled in  
electoral role for Chak No.90/6-R and is an  
elected general counselor, petitioner No.2 is  
enrolled as voter in Chak No.91/6-R and is  
elected Chairman of Union Council named as  
Muhammad Pur, petitioner No.3 is a voter  
enrolled in electoral role of Chak No.97/6-R,  
similarly petitioner No.4 is voter enrolled  
in chak No.133/9-L (PC 102/9-L). The  
petitioners are eligible to file the instant  
representation to raise the objection  
against exclusion of their patwar  
from chak No.90/6-R, 97/6-R from NA-

148 Sahiwal-II and aggrieved of its inclusion in NA-149 Sahiwal-III.

2. That while making the delimitation the area of NA-147 Sahiwal-I is correctly delimited whereby geographical compactness and other physical features were kept in view, but while delimitating NA-148 and NA-149 Sahiwal-II & Sahiwal-III the physical features, geographical compactness of the areas have been ignored. Even the map prepared during delimitation process is also crafted wrongly in violation of Section 20 of Election Act 2017. The petitioners in order to get the same corrected make the following objections, to maintain geographical compactness of the area and to sustain the existing boundaries of the proposed delimitation:-

#### GROUND OF OBJECTIONS

- a. That the PP Constituencies of District Sahiwal are starting from North-East of the District Sahiwal, whereas the NA constituencies are starting from North-West of Sahiwal and if as per Rule 10(5) of Conduct of Election Rules 2017 is strictly followed then the first NA constituency of District Sahiwal will be the constituency which covered Municipal Corporation Sahiwal and Eastern areas. The description of NA-II will remain as it is and then the constituency consists of Chichawatni MC will be numbered. During delimitation process the PP Constituencies are delimited/ numbered in the same manner, whereas the NA constituencies are numbered and bifurcated differently even without history of the District



NA Constituency MC Sahiwal. Therefore, it is required that the formula of starting delimitation from MC Sahiwal constituency as adopted in PP should be applied for NA constituency as well, which will not make any bigger difference between the proposed 3-NA constituencies. Apart from the hereunder described irregularities.

- b. That the patwar circle of Chak No.90/6-R was included in NA-161 Sahiwal-II in the delimitation of 2002 prior to it the same was part of old NA-125 Sahiwal-II. The revenue estate Chak No.90/6-R is situated on the north western side of Muhammadpur Road which started from the west of Sahiwal MC, upon which 89/6-R comes first on right side of said road and after crossing the said revenue estate 89/6-R the revenue estate of Chak No.90/6-R comes which has two abadies 90/6-R and 90A/6-R, Chak No.90/6-R is situated in the west of 89/6-R on the left side of Muhammadpur Road and 90A/6-R is located in north of 89/6-R on the right side of Muhammad Pur Road. Whereas Chak No.91/6-R is situated away from 90/6-R in North Western side, adjacent to Mauza Muhammad Pur Qanoongi that is why the same is included in the Union Council of Muhammad Pur and petitioner No.2 is elected chairman of the said union council.
- c. That similarly Patwar Circle 97/6-R have been part of present NA-161 and even previously it was part of NA-125 which is located in the west of Municipal Corporation Sahiwal.
- d. That patwar Circle 97/6-R is consists of

MC Sahiwal run towards Harrapa. All the other PCs on this road are part of NA-148 Sahiwal-II, whereas only this PC from the said road is detached from NA-148 and is included with NA-149 Sahiwal-I which has no compactness with the said NA constituency. These PCs were never part of present NA-160 and old NA-124 prior to 2002 (the NA consists of Sahiwal M.C and the eastern area of Sahiwal District connected with Okara District). Historically these PCs were always part of NA-II Sahiwal, hence by excluding the same from NA-148 Sahiwal-II neither the geographical compactness of the area was kept in mind nor the physical features, way of communication were considered and even the administrative boundaries of these administrative units were also been flouted. Therefore, as per Section 20 of Election Act 2017 this notification is required to be reversed. It is pertinent to submit here that these PCs are not physically connected with NA-149 in any manner, therefore, the factors of ensuring homogeneity are also being disturbed.

- e. That the population of 90/6-R PC is 11883 whereas population of 97/6-R PC is 11988, which total comes to 23871.
- f. That the patwar circles 78/5-R which have the population of 8399 and patwar circle 81/5-R which have the population of 12412 which were historically always part of National Assembly Constituency connected with M.C. Sahiwal present constituency NA-160. Old delimited constituency NA-124 which was numbered as Sahiwal-I the same patwar circles were part and parcels

and 81/5-R are located in the east of Sahiwal MC but these were wrongly included in NA-148 with whom these PCs are not connected in any manner, hence by including these PCs with NA-148 Sahiwal-II neither the geographical compactness is kept in view nor physical features and existing boundaries of these administrative units were strictly followed. These two PCs have population of 20811, meaning thereby if the PCs 90/6-R and 97/6-R are excluded from NA-149 and the same are included with NA-148 Sahiwal-II while substituting the PCs 78/5-R and 81/5-R, no major population of these constituency will be disturbed and by doing this the requirement of Section 20 of Election Act 2017 will be strictly adheres.

- g. That there is another aspect of the matter that one PC 102/9-L which have the population of 13554 is also excluded from NA-148 and the same is also shown to be included with NA-149. This patwar circle was previously part of NA-161 and prior to that NA-125 till delimitation of 2002. This PC is not connected in any manner with the M.C. of Sahiwal which is part and parcel of NA-149 Sahiwal-III and even the PCs located in the east of this PC are part of NA-148 Sahiwal-II, but this PC is included in NA-149 which is against the principles of delimitation as enshrined under section 20 of Election Act 2017, even otherwise there is national highway, main railway station and lower bari doab canal is separating this PC from the PCs situated in north side i.e. 6-R PCs and this PC is situated

reaches 4/5 KM in west of Sahiwal the area of PC 102/9-L started. This PC is not at all historically connected with the constituency consists of MC Sahiwal, but through the impugned proposed delimitation all the factors of compactness, ways of communication existing boundaries have not been kept in view.

- h. That the constituency in which above described PCs were included numbered as NA-125 prior to the delimitation of 2002 when the District Sahiwal was bifurcated in three National Assembly Constituencies and now again the District Sahiwal is being bifurcated in three constituencies, therefore, the previous history of this PC while delimitating has to be taken into consideration.
- i. That there is another omission in the preliminary list that the part of area i.e. Chak No.52/5-L of QH Sahiwal District now part of Okara Cantonment there are two circles having population Circle No.4 2603 and Circle No.5 population is 14772. Total population 17375 has not been included in any constituency inspite of the fact that the same area falls within the ambit of Sahiwal District which was previously included with NA-160 Sahiwal-I, therefore the same population is required to be added with NA-149 Sahiwal-III.
- j. That if the above proposals are accepted the NA-147 population which is 852005 which will be remained as it is and population of NA-148 Sahiwal-II will be 845429 and the population of NA-149 will

remained within the parameters of 10% which is permissible under the law.

In view of the above submissions, it is, therefore, most respectfully prayed that the PCs 90/6-R, 97/6-R and 102/9-L may kindly be excluded from NA-149 and the same may kindly be included in NA-148 Sahiwal-II and the PCs 78/5-R and 81/5-R of Sahiwal Headquarter Qanoongoi be included with NA-149 Sahiwal-III.

**PETITIONERS**

**CH. MUHAMMAD SARWAR S/O CH. ABDUL HAQ RESIDENT/  
VOTER OF CHAK NO.90/6-R, TEHSIL AND DISTRICT  
SAHIWAL.**

**MUHAMMAD NAEEM SARWAR RAMAY S/O MUHAMMAD SARWAR  
RAMAY, RESIDENT /VOTER OF CHAK NO.91/6-R, TEHSIL  
AND DISTRICT SAHIWAL.**

**AHMAD RAZA AKRAM SON OF CH. MUHAMMAD AKRAM,  
RESIDENT/VOTER CHAK NO.97/6-R, TEHSIL AND  
DISTRICT SAHIWAL.**

**MAZHAR HUSSAIN SON OF AHMAD, RESIDENT/  
VOTER OF CHAK NO.133/9-L (PC 102/9-L),  
TEHSIL & DISTRICT SAHIWAL**

through

**M.A. GHAFAR-UL-HAQ**

Advocate Supreme Court

C.C. No.PLH-14539

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