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**BEFORE THE SECRETARY ELECTON COMMISSION OF**  
**PAKISTAN**

**REPRESENTATION UNDER CHAPTER 3 RULE 12 SUB**  
**RULE 4 OF THE ELECTION RULES 2017 REGARDING**  
**PP-189 and PP-190.**

That the petitioner is voter member of District Okara and the following facts and grounds were overlooked /not considered by this commission while draft was published under Rule 11 (2) of Election Rules 2017 for the proposed de-limitation of the above mentioned constituencies.

**FACTS:**

1. As per the proposed draft prepared by the de-limitation committee on form 5 and published by this commission under Rule 11(2) of Election Rules 2017, PP-189 is comprised of the following:

- (a) Okara Municipal Committee and
- (b) Chak No. 004/4-L Patwar Circle of Okara-1 QH  
Of Okara District

Total Population: **390,143**

2. As per the proposed draft prepared by the de-limitation committee on form 5 and published by this commission under Rule 11(2) of Election Rules 2017, PP-190 is comprised of the following Revenue Areas:

- (a) The following QHs of Okara Tehsil;
  1. Okara Cantt
  2. Okara-II
  3. Okara-I excluding Chaka No. 004/4-L  
PC;

- (b) Okara Cantonment

- (c) The following PCs of Akbar QH

1. Chak No. 022/GD
2. Chak No. 049/3-R
3. Chak No. 052/3-R

5. Chak No. 046/3-R  
6. Chak No. 040-/3-R;  
Of Okara District

Total Population: 371,233

3. That petitioner submits memorandum of representation inter alia on the following:

**GROUND**

The following relevant factors and circumstances were overlooked, which are necessary for the welfare and well-being of the people of the constituencies, as well as fair play.

- a. That the total population of Municipal committee Okara was 357936. On the other hand, the Patwar Circle's 4/4-L population was 32208. Afterwards both the former and the latter were combined to form constituency PP-189 with a population of 390143.
- b. That the Patwar Circle 54/2-L with a population of 36461 was removed from PP-189 and added to PP-190 which has a population of 371233.
- c. That the Patwar Circle 54/2-L from the year 1970 to 2013 General Elections remained part of PP-189. This amounts to almost a half century, and the Patwar Circle 4/4-L from the year 1970 to 2013 General elections remained part of PP-190. These two constituencies have their own geographical, political, and historical structures. But, unfortunately without any lawful justifications these geographical, political, and historical structures have been changed.
- d. That the Union Council 54/2-L of Patwar Circle 54/2-L through its resolution dated 09-03-2018 requested for affiliation with PP-189.
- e. That the Union Council 53/2-L of Patwar Circle 54/2-L through its resolution dated 10-03-2018 requested for affiliation with PP-189.
- f. That the Municipal Committee Okara through its resolution dated 04-03-2017 demanded to include Patwar Circle 54/2-L in it and it also wrote a letter to

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- the inclusion of Patwar Circle 54/2-L in Municipal Committee Okara.
- g. That in revenue Bandobast the Patwar Circle 54/2-L was considered as an urban area whereas Patwar Circle 4/4-L was shown as military farms' Patwar Circle.
  - h. That the Patwar Circle 54/2-L comprised on 5244 acres out of which 3763 acres have residential colonies on it which are part of the Municipal Committee. The 72% area (3763 acres) of the Patwar Circle 54/2-L is already part of PP-189 and remaining area of 1481 acres which is 28% of total area if not included in the said constituency will amount to the misuse of power in regard to the facilitation of the people as per guide lines provided in section 20 of the election act 2017.
  - i. That the Patwar circle 4/4-L is comprised on 9345 acres and entire circle is based on military farms Chakook and it is not possible to include it in urban areas. Therefore, the geographical and historical value of the PP-189 and PP-190 must be recognized and Patwar Circle 54/2-L should be included in Municipal Committee. Amended Patwar Circle 4/4-L which is comprised on military farms and the remaining 13 military farms Chakooks must be adjusted together due to ease in communication.
  - j. That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to the distribution of population in geographically compact areas. In terms of newly created constituencies, geographic hurdles shall hinder the smooth living of the local people and conduct of fair polls.
  - k. That as per the section 20 (3) of Election Act 2017, the variation in population of constituencies of an assembly, or a local government shall not ordinarily exceed 10%.
  - l. That as per section 20 (1), all constituencies for general seats shall, as far as practicable be delimited having regard to existing boundaries of administrative units. The newly constituted constituencies shall adversely affect the functioning of administrative departments, causing inconvenience to the voters.
  - m. That the proposal prepared by the petitioner makes sure that the area remains geographically compact.

Furthermore, the proposal does not affect the existing boundaries of the administrative units.

- n. That principal as laid down in section 20 of the election act 2017 have been violated while notifying the preliminary delamination .as such, not sustainable.
- o. That reason to make constituency would be the harmony between the local population and their convenience which principle has been violated while notifying the preliminary constituency ,hence required to be correct.

The petitioner proposes the following scheme, which shall fulfill the criteria as laid down in section 20(1) of the Election Act 2017.

**Petitioner's Proposal:**

- (a) Following QHs may be combined together to form PP-189:
  - (i) Municipal Committee Okara
  - (ii) PC 54/2-L

Total Population: 394,396

- (b) Following QHs may be combined together to form PP-190:
- (c) The following QHs of Okara Tehsil;
  1. Okara Cantt
  2. Okara-I
  3. Okara-I (excluding PC 54/2L

- PC;
- (d) Okara Cantonment
- (e) The following PCs of Akbar QH
  1. Chak No. 022/GD
  2. Chak No. 049/3-R
  3. Chak No. 052/3-R
  4. Chak No. 042/3-R
  5. Chak No. 046/3-R
  6. Chak No. 040-/3-R

Of Okara District

Total Population: 366980/

Note: PC 54/2-I should be excluded and PC 4/4-L should be

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Detailed arguments/maps/facts shall also be placed before this honorable commission.

**PRAYER:**

It is therefore, respectfully prayed that the proposal based upon amendments/alterations and modifications submitted by the petitioner in the body of the petition may kindly be declared as the area of the constituencies of PP-189 and PP-190, in the interest of justice.

M. ASHRAF  
**Petitioner**

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Through

  
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