

Memorandum of Representation by: Malik Imran Tariq Dhaku s/o Malik Mohammad Tariq Dhaku

Registered Voter: Block Code 208081504, Serial No. 312, Chak No. 112/9-L, Sahiwal.

Address: Chak No. 112/9-L Budh Dhaku, Dak Khana Khas Tehsil Sahiwal, District Sahiwal.

Phone: 03216910112, 03454488555

To,

The Secretary,
Election Commission of Pakistan
G-5/2, Constitution Avenue,
Islamabad

Subject: **REPRESENTATION under Rule 12 of the Election Rules 2017 read with CHAPTER III of the Election Act 2017 and all other enabling provisions of law in respect of delimitation of Provincial Assembly Constituencies in District Sahiwal.**

Respected Sir,

1. The instant Representation is being filed by Malik Imran Tariq Dhaku (hereinafter referred to as the "Petitioner"), holder of NIC # 36502-1177524-1 and registered voter member of Chak NO 112/9-L Patwar Circle (PC), Block Code 208081504 Serial No. 312 which falls under Provincial Assembly Constituency, PP-198 Sahiwal-III (previously PP-222 Sahiwal-III) as per the Preliminary Delimitation Report 2018 published by the Election Commission of Pakistan.
2. Through this Representation, the Petitioner seeks to challenge the Preliminary Proposal published by the Election Commission of Pakistan pertaining to the delimitation of Provincial Assembly Constituencies of District Sahiwal. The map of district Sahiwal provided by the Provincial Election Commission as per the Preliminary Delimitation Report 2018 is attached as **Annexure-A**.
3. In the Preliminary Proposal, Sahiwal District has been divided into

4. It is pertinent to mention here that the welfare of the local populace is of paramount importance to the Petitioner who belonging from a political background is well appraised of the current dynamics in the area.
5. That the relevant Delimitation Committee failed to adhere to the mandatory principles and procedures in letter and spirit. The Preliminary Proposal is in sheer violation of the Statutory Principles of Delimitation as enshrined in Chapter III of the Election Act 2017, Section 9 of the Delimitation of Constituencies Act, 1974, thus it is necessary to make an amendment/alteration. No heed has been paid by the Delimitation Committee to the principles of compactness, contiguity and public convenience etc.
6. The Petitioner proposes that the following changes be made:

- I. **PP-196 Sahiwal-I:** The Petitioner proposes the exclusion of the following PCs falling under Yousaf Wala QII from PP-196 and their addition to PP-198:

Chak NO	Population
111/9-L	7584
074-A/5-L	10214
076/5-L	6861
078/5-L	4003
080/5-L	4450
082/5-L	4704
	37816

It is additionally proposed that the following PCs falling under Sahiwal QH be excluded from PP-198 and be added to PP-196:

Chak NO	Population
90/9-L	36748
94/9-L	17934
	54682

II. PP-199 Sahiwal-IV: The Petitioner proposes that the following PCs from Naiwala QH be excluded from PP-199 and added to PP-198:

Chak NO	Population
121/9-L	5383
140/9-L	10717
152/9-L	5001
153/9-L	7297
	28398

It is additionally proposed that the following PCs from Sahiwal QH be excluded from PP-198 and added to PP-199:

Chak No	Population
078/5-R	8399
081/5-R	12412
	20811

III. PP-200 Sahiwal-V: The Petitioner proposes that the following PCs from Naiwala QH be excluded from PP-200 and added to PP-198 in addition to the PCs mentioned in serial number (II) before:

Chak No	Population
155/9-L	3401
	3401

A comparison of the current and proposed population of the proposed constituencies is as under:

Constituency	Current proposed population	Population after alteration
PP-196	375231	392097
PP-198	343516	337638
PP-199	343814	336227
PP-200	347216	343815

The amended proposal is highlighted in map attached as Annexure-B and drafted in Annexure-C.


7. The foregoing proposal is based on the following amongst other

G R O U N D S

- A. The aforementioned proposals are keeping in view the principles of compactness, contiguity of physical features, public convenience and communication and other cognate factors.
- B. There is no direct communication link from PP-198 to Chak NO. 78/5-R PC and Chak No. 81/5-R PC. Since they are cut off from PP-198 by the National Highway and the bridgeless Lower Bari Doab. The only possibility to approach them is by travelling firstly through PP-197 and PP-199 and then to the aforementioned PCs. Is such it is desirable that these PCs be added to PP-199 with which they are contiguous and easily approachable for the sake of compactness and public convenience.
- C. There is no population/topographical link of PCs Chak NO 90/9-L and 94/9-L with PP-198 Sahiwal-III and they are physically more aligned, homogeneous and directly linked with PP-196. To access the aforementioned it is imperative to travel firstly into PP-197 and then to approach PC Chak NO 94/9-L especially Chak Nos 086/9-L and 089/9-L, Sahiwal Bunga Hayat Road has to be taken. Since majority part of Sahiwal Bunga Hayat Road falls under PP-196, it is advisable to add Chak NO 94/9-L PC in the same due to physical proximity and ease of communication. PCs Chak NO 90/9-L and 94/9-L are just random pockets difficult to access when kept inside PP-198. But they are naturally aligned to PP-196. Sahiwal Bunga Hayat Road which is a part of PP-196 is the best and easy approach for villages falling in the aforementioned PC.
- D. Due to their physical proximity to Sahiwal Pakpattan Road which falls mainly under PP-198, the following PCs merit exclusion from PP-196 and addition to PP-198:

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078/5-L
080/5-L
082/5-L



Accessing these PCs from PP-198 is easier and convenient.

- E. Due to their physical proximity to the Sahiwal-Arifwala-Bahawalnagar Road which falls under PP-198, the following PCs merit exclusion from PP-199 and addition to PP-198:


121/9-L
140/9-L
152/9-L
153/9-L
155/9-L

- This amendment shall be in the interest of public convenience and communication. Additionally, these PCs do not form a geographically compact area of PP-199 and are in the shape of a pocket which is physically contiguous to PP-198.
- F. That the proposed amendments will help exclusion of random pockets and bringing the constituencies in line in a zig zag manner and in a compact area which shall be easily accessible from the respective constituencies.
- G. The Preliminary Proposal has disturbed the uniformity and compactness of the constituencies; hence it has become necessary to incorporate the amendments.

In view of the foregoing, if the Preliminary Proposal is finalised without incorporating amendments suggested by the Petitioner, the entire population of District Sahiwal will suffer irreparable loss and hardships and their miseries would increase manifold.

Hence, it is most respectfully prayed that the instant representation may kindly be accepted and the amendments suggested by the Petitioner may

Any other relief which may be deemed just and appropriate may also be granted in the interest of law, justice and equity.



Imran Tahir

Petitioner

Through

Ameer Hamza Dogar

Ameer Hamza Dogar
Advocate High Court