

Memorandum of Representation by: Muhammad Waqar Naseeb s/o Muhammad Amin-ud-Din  
Address: Post Office Chak No. 41/12-L, Tehsil Chichawatni, District Sahiwal.  
Phone: 0321-4300664

To,

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

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M/04/04/218

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 Tehsil Chichawatni, District Sahiwal particularly PP-200 Sahiwal-V and PP-201 Sahiwal-VI.

Respected Sir,

1. The instant Representation is being filed by Muhammad Waqar Naseeb (hereinafter referred to as the "Petitioner"), holder of NIC # 36501-1881838-5 and registered voter member of Chak NO 041/12-L Patwar Circle (PC) which falls under Provincial Assembly Constituency, PP-201 Sahiwal-VI as per the Preliminary Delimitation Report 2018 published by the Election Commission of Pakistan.
2. Through this Representation, the Petition seeks to challenge the Preliminary Proposal published by the Election Commission of Pakistan pertaining to the delimitation of Provincial Assembly Constituencies of Sahiwal, particularly the exclusion of Chak NO 41/12-L from PP-200 Sahiwal-V and it's proposed inclusion in PP-201 Sahiwal VI. 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 (7) seven Provincial Assembly Constituencies numbered PP-196

(Sahiwal-I) till PP-202 (Sahiwal-VII) which previously also were (7) seven numbered PP-220 (Sahiwal-I) till PP-226 (Sahiwal-VII).

4. It is pertinent to mention here that Chak NO 041/12-L PC previously fell under PP-224 Sahiwal-V.
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.
6. The Petitioner proposes that Patwar Circle (PC) Chak NO 041/12-L of Chichawatni QH constituting a total population of 8,696 may kindly be excluded from PP-201 Sahiwal-VI and be added to PP-200 Sahiwal-V. The proposed amendment is highlighted in map attached as Annexure-B.
7. The foregoing proposal is based on the following amongst other

## G R O U N D S

*M/04/04/2018*

### A. HISTORICAL:

Traditionally, historically, socially, culturally and geographically, Chak NO 041/12-L PC has always been a part of PP-224 Sahiwal-V. In the Preliminary Proposal for PP-200 Sahiwal-V, the Western Boundary/Limits have been kept the same as they were for PP-224 Sahiwal-V except for the exclusion of Chak NO 041/12-PC. A map of Sahiwal District showing the composition of PP-224 Sahiwal-V is attached herewith as Annexure-C.

### B. FACILITIES OF COMMUNICATION AND PUBLIC CONVENIENCE:

There is no population/topographical link of Chak NO 041/12-L with PP-201 Sahiwal-VI as there is a distance of at-least 3 kms covered by agricultural fields between Chak NO 41/12-L and Chak

NO 40/12-L. Chak NO 041/12-L PC consists of Chak NO 34/12-L and Chak NO 41/12-L. Both of these fall on Chichawatni-Burewala Road with the built up populated area of Chak NO 41/12-L being only 300 metres off the road and the built up populated area of Chak NO 34/12-L being only 800 metres off the road. An image from Google Maps is attached herewith as **Annexure-D**. Now it is interesting to note that no other PCs of PP-201 Sahiwal-VI are contiguous to the Chichawatni-Burewala road. As a matter of fact almost 20 kms area on both sides of the Chichawatni-Burewala Road falls under PP-200 Sahiwal-V. As such, by excluding Chak NO 41-12-L from PP-200 Sahiwal-V, ease of communication and public convenience has been fragrantly ignored. It is easier and more direct to approach the PC from PP-200 in comparison to PP-201 from where the road network is poor and practically non-existent at some points. Hence, the population and road network of Chak NO 41/12-L PC is close to PP-200 Sahiwal-V.

#### C. DISTRIBUTION OF POPULATION:

As per the Preliminary Proposal, the population of PP-201 Sahiwal-VI is 3, 75,447 (Three hundred seventy five thousand and four hundred and forty seven) and that of PP-200 Sahiwal-V is 3, 47,216 (Three hundred forty seven thousand and two hundred and sixteen only). The related pages from the draft proposal are attached herewith as **Annexure-E**. As per the latest census, population of Chak NO 41/12-L is 8,696 (Eight thousand six hundred and ninety six). If this population is subtracted from PP-201 and added to PP-200, the consequence will be a population of 3, 66,751 in PP-201 and 3, 55,912 in PP-200 which perfectly adheres to the distribution of population in a geographically compact area and creation of homogeneity as a consequence.

#### D. STATUTORY/POLITICAL:

Section 17 of the Election Act 2017 clearly states that the Commission shall delimit territorial constituencies in accordance with the provisions of the Constitution, the Act and the applicable local government law. It is pertinent to mention here that Chak NO 41/12-L falls under UC NO 57 along-with Chak NO 10/11-L, 11/11-L and 35/11-L which are all part of PP-200 Sahiwal-V in the Preliminary Proposal. Hence, Chak NO 41/12-L has been excluded from PP-200 Sahiwal-V due to mala fide.

E. OTHER FACTORS:

*18/04/2018*

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That for the purposes of census, the block codes of Chak NO 41/12-L PC was from serial numbers 209010801-209010809. Even these serial numbers are contiguous to Chak NO 010/11-L PC (209010701-209010713) and Chak NO 039/12-L PC (209010901-209010918), both of which are included in PP-200 Sahiwal-V.

In view of the foregoing, if the Preliminary Proposal is finalised without incorporating amendments suggested by the Petitioner, the entire population of Chak NO 41/12-L PC 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 kindly be incorporated in the final proposal.

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

*Waqar*

Petitioner

*vote no . 423*

Through

*Ameer Hamza Dogar*

Ameer Hamza Dogar  
Advocate High Court