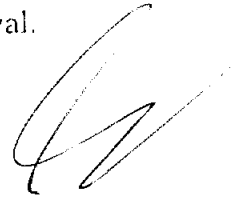


Memorandum of Representation by: Waheed Asghar Dogar s/o Asghar Ali Dogar  
Address: House No. 7/E, Housing Colony, Tehsil Chichawatni, District Sahiwal.  
Phone: 03008690399



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

Respected Sir,

1. The instant Representation is being filed by Waheed Asghar Dogar (hereinafter referred to as the "Petitioner"), holder of NIC # 36501-1835340-5 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 Petitioner 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 (previously PP-224 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

4. It is pertinent to mention here that Chak NO 041/12-L PC previously fell under PP-224 Sahiwal-V and that the Petitioner was elected as Member of the Provincial Assembly twice from the same constituency in the year 2002 and then in 2013. He is a member of the incumbent Provincial Assembly. Welfare of the local populace is of paramount importance to the Petitioner who is well apprised 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.
6. The Petitioner proposes that in the Preliminary Proposal for District Sahiwal, and particularly Tehsil Chichawatni, 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 proposal 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

### 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 present PP-224 Sahiwal-V is attached herewith as Annexure-C.




## B. FACILITIES OF COMMUNICATION AND PUBLIC CONVENIENCE:

There is no population/typographical 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 principle of distribution of population in a geographically compact area and creation of homogeneity as a consequence.

## D. STATUTORY/POLITICAL:



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. This only gives credence to the fact that Chak NO 41/12-L PC is traditionally, socially, administratively, culturally and politically a part of PP-224 Sahiwal-V (Proposed PP-200). Hence, Chak NO 41/12-L has been excluded from PP-200 Sahiwal-V due to mala fide with the intention of causing irreparable harm to the Petitioner.

**E. OTHER FACTORS:**

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.

  
Petitioner

Vote No - 151

Through

