

Memorandum/Representation by: Mohammad Ali son of Abdul Ghafoor
resident of Chak No.111-SB Sargodha Mob: 0300-8116202
Email Address: alfarooqlawchamber@hotmail.com

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To,

THE SECRETARY,
Election Commission of Pakistan
Election Commission Secretariat,
G-5/2, Constitution Avenue,
Islamabad

Subject: REPRESENTATION under Rule 12 of the Election Rules 2017 ("The Rules") read with Section 20 of the Election Act 2017 ("The Act") challenging the Preliminary Proposal pertaining to the delimitation of National Assembly constituencies in District Sargodha

Respected Sir,

1. The instant Representation is being filed by Mohammad Ali (hereinafter referred to as the "Applicant") voter member of National Assembly Constituency No.91 Sargodha-4 and the Applicant is duly competent to file the instant Representation under the law.
2. Through this Representation, the Applicant seeks to challenge the preliminary proposal published by the Election Commission of Pakistan pertaining to the delimitation of the National / Provincial Assembly constituencies of District Sargodha (hereinafter referred to as The "Preliminary Proposal"). The map of the Preliminary Proposal which was provided by the Provincial Election Commission, as per the mandate of law, is attached as ANNEXURE-A.
3. It is pertinent to mention here that in the Preliminary Proposal, District Sargodha is now left with five (5) National Assembly (NA) constituencies, numbering NA-88, NA-89, NA-91, NA-92.
4. The Preliminary Proposal is in sheer violation of the Statuary Principles of delimitation as enshrined in Section 20 of the Act

(“The Principles”) along with catena of dictums laid down by the Superior Courts of the country, thus it is deemed necessary to amend/alter/change the Preliminary Proposal as follows: 2

Suggested Amendments in the Preliminary Proposal:

- a) Election commission has shifted QHS of Sargodha Tehsil PCS
- 1) Chak No. 46-SB
 - 2) Chak No. 59-SB
 - 3) Chak No.116-SB

From QHS Sargodha Tehsil to Silanwali Tehsil which should be Reverted Back to QHS of Sargodha Tehsil

In this way, the proposed suggestion will complete the constituency of 76 Sargodha V

- b) Similarly the election commission has shifted PCS of
- 1) Chak No.119 NB of Silanwali-I QH
 - 2) Chak No.116 NB of Silanwali-II QH to

Tehsil Saliwal which should be reverted back to Tehsil Silanwali and in this way the proposed suggestion will complete constituency of PP-79 Sargodha 8

GROUND SUPPORTING THE SUGGESTED AMENDMENTS

HISTORICAL / CULTURAL BACKGROUND

- a) Traditionally, historically and previously chak No. 46-SB,59-SB,116-SB have always been part of Sargodha Tehsil and Chak No.116/NB and 119/NB have been part of Tehsil Silanwali
- b) Easy Access
- It is for the convenience and comfort of the population / public of Chak No. 46/SB, 59/SB, 116/SB to visit and travel if they remain in Tehsil Sargodha instead of Tehsil Silanwali.
- c) Long association of neighbour hood will be continued.

- d) The public can easily approached their representation to explain their problems. 3/
5. The above mentioned grounds are suggested strictly keeping in mind the Principles and the welfare of the people of Sargodha District and it is stated on oath that no reflection of personal liking / disliking and Sargodha or bias is shown while making the said suggestions.
6. The map of District Sargodha showing the NA Constituencies after incorporation of the suggested amendments mentioned herein is attached at ANNEXURE-H

In view of the aforementioned grounds it is suggested that the Preliminary Proposal may kindly be amended as per the suggested amendments narrated above in the best interest and welfare of the people of Sargodha District.

Profound Regards

MOHAMMAD ALI
Advocate High Court
District Courts Sargodha