



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN

Adjudication Department- I

Adjudication Division

**Before Mahboob Ahmad, Additional Director/Head of Wing
(Licensed Entities-Adjudication Department-I)**

In the matter of

MSD Capital Equities (Private) Limited

Show Cause Notice No. and Issue Date

No.2(170)SMD/Adj-1/2019-69
February 22, 2024

Date(s) of Hearing:

May 02, 2024

Attended By:

Mr. Shafqat Ali
(Authorized Representative)

ORDER

UNDER REGULATION 31 OF THE SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN (ANTI MONEY LAUNDERING AND COUNTERING FINANCING OF TERRORISM) REGULATIONS, 2020 READ WITH SECTION 6(A)(2)(h) OF THE ANTI-MONEY LAUNDERING ACT, 2010 AND RULE 4(1)(a) AND 6(1) OF THE AML/CFT SANCTION RULES, 2020

This Order shall dispose of the proceedings initiated against **MSD Capital Equities (Private) Limited (the Company and/or the Respondent)** vide Show Cause Notice dated February 22, 2024 (the SCN) issued under Regulation 4 of the Securities and Exchange Commission of Pakistan (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2020 (the AML/CFT Regulations) read with Clause A and B of Statutory Regulatory Order No. 920(I)/2020 dated September 28, 2020 (the SRO 920) in conformance with Statutory Regulatory Order 197(I)/2021 dated February 12, 2021 (the SRO 197), and Regulation 25 of the AML/CFT Regulations read with Clause D of the SRO 920 under Regulation 31 of the AML/CFT Regulations read with Section 6(A)(2)(h) of the AML Act, 2010 (the AML Act) and Rule 4(1)(a) and 6(1) of the AML/CFT Sanction Rules, 2020 (the AML/ CFT Rules).

2. The Respondent was incorporated in Pakistan on December 28, 2012 as a Private Limited Company under the Companies Ordinance, 1984 (the Ordinance) (repealed by the Companies Act, 2017). The Company is an active Trading Right Entitlement Certificate (TREC) holder of Pakistan Stock Exchange Limited (PSX). The principle activities of the Company are to act as a member of PSX and to carry on the business of broker in stock, share, modaraba certificates, securities etc. The Company is a regulated person as per definition stated at Clause (r) of Regulation 3(1) of the AML/CFT Regulations.

3. The Securities and Exchange Commission of Pakistan (the Commission) issued the SRO 920 and subsequent the SRO 197, whereby, all regulated persons were directed to comply with the following reporting requirements and submit information in the manner prescribed therein:



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- A. Annual risk assessment and control/compliance assessment framework based on data and information as on March 31st, to be filed by April 30th;
- B. Quarterly information/ data on 30th of the subsequent month of every quarter;
- D. Compliance report on Statutory Regulatory Orders issued by the Ministry of Foreign Affairs (**the MOFA**), under the United Nations (Security Council) Act, 1948 or intimation from National Counter Terrorism Authority /Law Enforcement Agencies/Home Departments of Provinces/Ministry of Interior regarding updates in the list of proscribed person(s)/entity(ies) under the Anti-Terrorism Act, 1997 (**ATA, 1997**) within **forty-eight (48) hours** of receiving the same on <https://eservices.secp.gov.pk/eservices/> by authorized officer of the Regulated Persons.
4. During the review of the compliance status of the Respondent with the requirements of the directive for the period from July 1, 2022 to June 30, 2023 (**the Review Period**), an explanation vide email dated November 14, 2023 and reminder vide email dated November 27, 2023, was sought from the Respondent with regards to the following observations. However, no response had been provided by the Respondent. It was observed that:

- a) The Respondent had not submitted the compliance reports as required in Regulation 4 of the AML/CFT Regulations read with clause A and B of SRO 920 in conformance with SRO 197, detailed as under:

Sr. No.	Name of Submission	Due Date
1	AML Annual Risk Assessment Report, 2023	30-Apr-2023
2	3 rd Quarter 2022 AML information /data report	31-Oct-2022
3	4 th Quarter 2022 AML information /data report	31-Jan-2023
4	1 st Quarter 2023 AML information /data report	30-April-2023
5	2 nd Quarter 2023 AML information /data report	31-July-2023

- b) The Company had not submitted the compliance reports on Statutory Regulatory Orders in **78 number of instances** (**Annexure-A**) as in Regulation 25 of the AML/CFT Regulations read with clause D of the SRO 920.

5. In view of above, non-submission of the aforementioned compliance reports, *prima facie*, is non-compliance of Regulation 4 of the AML/CFT Regulations read with Clause A and B of SRO 920 in conformance with SRO 197, and Regulation 25 of the AML/CFT Regulations read with Clause D of the SRO 920.



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6. The aforementioned non-compliances attracts the applicability of Regulation 31 of the AML/CFT Regulations read with Section 6(A)(2)(h) of the AML Act and Rule 4(1)(a) and 6(1) of the AML/CFT Rules. The relevant provisions of the law are reproduced as under:

SRO 920(I)/2020 dated September 28, 2020:

"A. Annual risk assessment and control/compliance assessment framework based on data and information as on 30 June, to be filed by 31st July of each financial year ("FY"), starting from the date of notification of this directive, and as instructed from time to time by the Commission.

a) Risk Assessment Framework: Regulated Entities should undertake and submit their internal annual risk assessment which should be aligned with the risks identified in the latest National Risk Assessment of the country and cover the process adopted for risk identification. The risk assessment methodology should cover the risk emanating from customers, products, geography and delivery channels, elaborate risk tolerance level and assess residual risk after implementation of mitigation measures. Regulated Entities are encouraged to use the template given in Annex 1 to the Guidelines for reference, but may choose their own risk assessment methodology that best suits or represents their business covering the aforementioned risks, in light of the AML Act, 2010 and the Regulations. The risk assessment report should be reviewed and approved by the board of Page 2 of 4 directors of the Regulated Entities and shall be signed by the chief executive officer/ company secretary.

b) Compliance Assessment Checklist: Regulated Entities should submit their annual compliance assessment checklist to demonstrate adequacy and effectiveness of AML/CFT compliance framework in light of the Regulations, and are encouraged to use the checklist provided in Annex 2 to the Guidelines for this purpose.

B. Quarterly information/ data on 30th of the subsequent month of every quarter, containing the following information:

- a) Extracts of the discussion / deliberations on ML/TF risks and issues, by board of directors and/or management committees;***
- b) Number of new customer accounts opened during the period according to risk categorizations i.e. high, medium and low and their respective investment amount;***
- c) Total number of foreign and domestic politically exposed persons ("PEP") and their total value of investments/deposits/financing etc. during the period;***
- d) Number of accounts/transactions closed and rejected for non-compliance of Customer Due Diligence ("CDD") process and due to identification in proscribed person/Targeted Financial Sanction ("TFS");***



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- e) Documentation of any activity for which a Suspicious Transaction Report ("STR") was considered but not filed along with rationale, during the period;
- f) Copies of reports/mechanism to identify unusual transactions warranting further review;
- g) Number of suspicious transactions, attempted transactions and currency transaction reports submitted to Financial Monitoring Unit ("FMU");
- h) Detail of complaints received on account of Know Your Customer ("KYC") / AML, including its status i.e. in process/ resolved / closed, during the period;
- i) Details of trainings conducted on AML/CFT for new and existing staff including number of participants and topics covered;
- j) Number of customers transferred from one risk category to another and their amount of investments;
- k) Confirmation of having an automatic Transaction Monitoring System ("TMS") or otherwise? If yes, the name of TMS used;
- l) Do you have automatic name screening solution? If yes, then what is the name of screening solution? If not, what are your future plans w.r.t. to automation;
- m) Upgradation in AML CFT policies/manuals during the reporting period;
- n) How much human resource is deployed for AML CFT and Compliance Function? Details of increase in number of employees during the period.

D. Compliance report on Statutory Regulatory Orders issued by the Ministry of Foreign Affairs under United Nations (Security Council) Act, 1948 or intimation from National Counter Terrorism Authority /Law Enforcement Agencies/Home Departments of Provinces/Ministry of Interior regarding updates in the list of proscribed person(s)/entity(ies) under the Anti-Terrorism Act, 1997, shall be submitted to the Commission within forty-eight (48) hours of receiving the same in the manner as may be instructed from time to time by the Commission.

Any person to whom this directive applies and who contravenes or fails to comply with the requirements of this directive or submits a return which is false in a material respect or where under a misstatement is made shall be liable to sanction in accordance with AML/CFT Sanctions Rules, 2020 issued under the AML Act, 2010 and imposed by the Commission according to section 6A of the AML Act."

SRO 197(I)/2021 dated February 12, 2021:

"In the aforesaid Notification, in section A, for their expression '30 June, to be filed by 31st July' the expression '31st March, to be filed by 30th April shall be established."

Regulation 4 of the AML\CFT Regulations:

"4. Risk Assessment - The regulated person shall take appropriate steps in accordance with section 7F of the AML Act to identify, assess and understand its money laundering, and terrorism financing risks for customers, countries or geographic areas and products, services,



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transactions or delivery channels. The regulated person shall:

- (a) document their risk assessments;*
- (b) consider all the relevant risk factors before determining what is the level of overall risk and the appropriate level and type of mitigation to be applied;*
- (c) keep their risk assessments up to date;*
- (d) categorize its own overall entity level risk as high, medium or low based on the result of risk assessment; and*
- (e) have appropriate mechanisms to provide risk assessment information to the Commission."*

Regulation 25 of the AML\CFT Regulations:

"(1) The regulated person shall undertake TFS obligations under the United Nations (Security Council) Act 1948 and/or Anti-Terrorism Act 1997 and any regulations made there under, including:

- (a) develop mechanisms, processes and procedures for screening and monitoring customers, potential customers and beneficial owners/associates of customers to detect any matches or potential matches with the stated designated/proscribed persons in the SROs and notifications issued by MOFA, NACTA and MOI."*

Regulations 31 of the AML\CFT Regulations

"(1) Any contravention of these regulations shall be cognizable by the Commission in accordance with section 6A of the AML Act and liable to sanction provided in the AML\CFT Sanctions Rules, 2020 and imposed by the Commission according to Clause (h) of Sub-section (2) of Section 6A of AML Act."

Rules 4(1)(a) of the AML\CFT Rules:

"(a) Impose a monetary penalty in accordance with these Rules;"

Rule 6(1) of the AML\CFT Rules:

"(1) The AML\CFT Regulatory Authority shall apply monetary penalties upto Rs. 100 Million per violation, in accordance with the risk-based penalty scale of the respective AML\CFT Regulatory Authority."

Section 6(A)(2)(h) of the AML Act

"(h) impose sanctions, including monetary and administrative penalties to the extent and in the manners as may be prescribed, upon their respective reporting entity, including its directors and senior management and officers, who violates any requirement in section 7(1), 7(3) to 7(6) and 7A to 7H and any rules or regulations made thereunder or those who fail to comply with the TFS regulations. Any person aggrieved by the imposition of sanctions under this clause may prefer an appeal in such manner and within such period to such authority as may be prescribed;"



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7. While taking cognizance in the aforesaid matter, the SCN was issued to the Respondent, calling upon it to show cause in writing as to why penalty as provided under Regulation 31 of the AML/CFT Regulations read with Rules 4(1)(a) and 6(1) of the AML Rules and Section 6A(2)(h) of the AML Act, may not be imposed on it for contravening the aforementioned provisions of the law.

8. In response to the SCN, Mr. Ali Ahmed (Chief Executive Officer of the Company) vide its letter dated March 03, 2024 submitted its reply as follows: -

"This is to our great surprise that AML Annual Risk Assessment Report 2023 required to be filed by 30th April 2023 and all Quarterly AML Information / Data Reports till the 2nd quarter 2023 required to be filed by the last dates of the month next to respective quarters have been appearing as submitted in compliance with Clauses A and B of SRO 920 in accordance with SRO 197 on newly launched eZfile portal of the Commission. However, all instances relating to Statutory Regulatory Orders received from July 01, 2022 to June 30, 2023 have been reinstated on eZfile portal as non-submitted as required in Clause D of the SRO 920, whereas, we have submitted compliance reports of majority of Statutory Regulatory Orders received during said period. In addition, all submitted SROs from July 01, 2023 to date have also been reinstated on eZfile portal..."

9. The Respondent was accorded an opportunity of personal hearing dated March 19, 2024. The hearing was attended by Mr. Shafqat Ali as Authorized Representative of the Respondent (the Representative). During the hearing, the Representative reiterated the aforesaid written submissions and also admitted the identified violations of the law. The Representative also assured that it will take the necessary measures to ensure compliance with the law in the future.

10. Subsequently, the Representative vide its email dated March 21, 2024 submitted, which is reproduced as under:

"This is with reference to hearing held on March 19, 2024 at 11:00AM before Additional Director/Head of Wing, SECP of the Show Cause Notice No. 1(170)SMD/Adj-1/2019-96 dated February 22, 2024 ("SCN") to MSD Capital Equities (Private) Limited.

Please note that as per appended email sent to SECP under copies to PSX, MSD Capital submitted his compliance report on the following up to February 01, 2024 before the date of issuance of SCN:

- 1. BLASR Submission December 31, 2023*
- 2. AML (Quarterly)*
- 3. AML (Annual)*

However, as confirmed by MSD Capital, all SROs relating to Proscribed Persons/Designated Entities were auto-scanned in the back-office provided by LSEFSL in compliance with clause



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D of SECP's Directive No. 920(I)2020 dated September 20, 2020 but inadvertently delayed in confirming to SECP on its e-services portal.

Now, MSD Capital Equities has completed the confirmations on SECP's eZfile portal till date and committed to ensure future compliance on timely basis."

11. Subsequently, the subject hearing was rescheduled for May 02, 2024 before the Authorized Officer. On this date, the Representative appeared again and reiterated already made verbal and written submissions.

12. I have gone through the facts of the case, relevant provisions of the law and considered the written as well as verbal submissions of the Respondent and its Representative in the instant case and the documents available on record. My observations in this regard are as under:

(i) **Whether the Respondent made timely compliance with the requirements of the SROs:**

No, the Respondent remained non-compliant till February 1, 2024 with Regulation 4 of the AML\CFT Regulations, as outlined in clauses A and B of SRO 920, in conformance with SRO 197, detailed as under:

S. No.	Name of Submission	Due Date	Submission Status As On Due Date
1	AML Annual Risk Assessment Report, 2023	30-Apr-2023	Not Submitted
2	3rd Quarter 2022 AML information /data report	31-Oct-2022	Not Submitted
3	4th Quarter 2022 AML information /data report	31-Jan-2023	Not Submitted
4	1st Quarter 2023 AML information /data report	30-April-2023	Not Submitted
5	2nd Quarter 2023 AML information /data report	31-July-2023	Not Submitted

It also remained non-compliant in **78 number of instances** with the requirements of Regulation 25 of the AML\CFT Regulations read with clause D of the SRO 920.

(ii) **Whether the subsequent compliance has been made by the Respondent:**

The record available with this office transpires that the Respondent failed to upload the AML returns in a timely manner as required under Regulation 4 of the AML\CFT Regulations read with clauses A and B of SRO 920, in conformance with SRO 197. This failure constitutes a violation of Regulation 4 of the AML\CFT Regulations, read with Clause A and B of SRO 920 in conformance with SRO 197. Further, the Respondent's non-compliance with these regulatory requirements was acknowledged by the Representative during the hearing and



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confirmed in its email dated March 21, 2024, wherein, it has been stated that the identified quarterly/annual reports were submitted on February 1, 2024.

Moreover, the Respondent has remained non-compliant in 78 number of instances with the requirements of Regulation 25 of the AML/CFT Regulations read with clause D of SRO 920, which were submitted to Commission with delay ranging from of 1 to 2 years. Further, the Respondent's non-compliance with the regulatory requirements was acknowledged by the Representative during the hearing and confirmed in its email dated March 21, 2024, wherein, it is stated that it was inadvertently delayed in confirming to SECP on its e-services portal. Now, MSD Capital Equities has completed the confirmations on SECP's eZfile portal till date and committed to ensure future compliance on timely basis. It has been noted that the Respondent submitted the abovementioned compliance reports at e-services portal, therefore, eZfile portal has no relevance.

(iii) **Whether delay in compliance absolve of Respondent from default:**

The Respondent did not timely submit the identified quarterly/annual reports, instead submitting it on February 1, 2014. Furthermore, in 78 instances, compliance reports in respect of Regulation 25 of the AML/CFT Regulations read with clause D of SRO 920 were submitted with a delay ranging from of 1 to 2 years. Therefore, the Respondent's subsequent compliance with a considerable delay did not absolve them of the default.

13. In view of the foregoing and the admission made by the Representative, non-compliances/ contraventions of the Regulation 4 of the AML\CFT Regulations read with Clause A and B of SRO 920 in conformance with SRO 197 and Regulation 25 of the AML\CFT Regulations read with Clause D of the SRO 920 have been established and admitted, which attracts the applicability of Section 6(A)(2)(h) of the AML Act, read with Regulation 31 of the AML Regulations, and Rules 4(1)(a) and 6(1) of the AML Rules, I hereby, impose a penalty of **Rs.200,000/- (Rupees Two Hundred Thousand Only)** on the Respondent.

14. The Respondent is hereby directed to deposit the aforesaid penalty in the account of the Commission being maintained in the designated branches of MCB Bank Limited or United Bank Limited within 30 days of the date of this Order and furnish Original Deposit Challan to this office forthwith.

15. The Respondent is advised to ensure its meticulous compliance with all applicable Laws, Rules, Regulations and Directions etc. notified/issued from time to time relating to anti money laundering and countering financing of terrorism in true letter and spirit, at all times.



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16. This Order is being issued without prejudice to any other action that the Commission may initiate against the Company and / or its management (including CEO of the Company) in accordance with the law on matters subsequently investigated or otherwise brought to the knowledge of the Commission.

(Mahboob Ahmad)

Additional Director / Head of Wing
Licensed Entities-Adjudication Department-I

Announced:
June 07, 2024
Islamabad



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Annexure-A

Sr. No.	SRO Name	Upload Date	Response Date
1	HD PUNJAB (Addition) 2 individuals	31/05/2023	NIL
2	HD PUNJAB (Addition) 17 individuals	31/01/2023	NIL
3	HD PUNJAB (Addition) 2 individuals	30/05/2023	NIL
4	SO(IS-1)4-02/2021 (addition-khanewal) 1 individual	29/08/2022	NIL
5	HD BALOCHISTAN(addition)3 individuals	27/02/2023	NIL
6	HD Punjab - Addition dated 26.10.22 (6 Individuals)	27/10/2022	NIL
7	SO(IS-1)4-02/2021 (addition)5 individual	27/07/2022	NIL
8	HD PUNJAB (Addition) 1 individual	24/02/2023	NIL
9	HD PUNJAB (Addition) 12 individuals	23/01/2023	NIL
10	SO(IS-1)4-02/2021 (addition) 1 individual	22/11/2022	NIL
11	HD Punjab Addition dated 22.09.2022 - 02 individuals	23/09/2022	NIL
12	HD PUNJAB (Addition) 8 individuals	22/05/2023	NIL
13	HD BALOCHISTAN(addition)1 individual	22/05/2023	NIL
14	HD PUNJAB (Addition) 8 individuals	22/03/2023	NIL
15	HD BALOCHISTAN(addition)1 individual	22/03/2023	NIL
16	SO(IS-1)4-02/2021 (addition) 1 individual	22/12/2022	NIL
17	HD Balochistan- Addition dated 26.09.22 (7 Individuals)	21/10/2022	NIL
18	HD PUNJAB (Addition) 2 individuals	21/06/2023	NIL
19	HD PUNJAB (Addition) 4 individuals	21/03/2023	NIL
20	HD PUNJAB (Addition) 7 individuals	21/02/2023	NIL
21	SO(IS-1)4-02/2021 (addition)2 individual	20/12/2022	NIL
22	SO(IS-1)4-02/2021 (addition) 8 individual	20/12/2022	NIL
23	SO(IS-1)4-02/2021 (addition) 2 individual	20/12/2022	NIL
24	HD KPK (Addition) 1 individual	20/03/2023	NIL
25	HD PUNJAB (Addition) 1 individual	21/02/2023	NIL
26	HD PUNJAB (Addition) 4 individuals	19/06/2023	NIL
27	HD Punjab Addition dated 17.11.2022 - Muhammad Akmal	18/11/2022	NIL
28	SO(IS-1)4-02/2021 (addition) 2 individual pakpattan	18/08/2022	NIL
29	SO(IS-1)4-02/2021 (addition)2 individual	18/07/2022	NIL
30	HD PUNJAB (Addition) 8 individuals	17/04/2023	NIL
31	SO(IS-1)4-02/2021 (addition) 11 individual	17/01/2023	NIL
32	HD PUNJAB ADDITION DATED 15.03.2023 1 INDIVIDUAL	16/03/2023	NIL
33	SO(IS-1)4-02/2021 (addition) 19 individual	16/08/2022	NIL
34	SO(IS-1)4-02/2021 (addition) 10 individual	16/08/2022	NIL
35	HD PUNJAB (Addition) 4 individuals	15/05/2023	NIL
36	HD PUNJAB (Addition) 13 individuals	15/05/2023	NIL
37	hd punjab addition dated 15.03.2023 1 individual	16/03/2023	NIL
38	HD Punjab(addition)4 individual	15/03/2023	NIL
39	HD Punjab - Addition dated 14.11.22 (10 Individuals)	14/11/2022	NIL
40	SO(IS-1)4-02/2021 (addition) 5 individual	14/07/2022	NIL
41	SO(IS-1)4-02/2021 (addition) 2 individual ABBOTTABAD	13/09/2022	NIL
42	SO(IS-1)4-02/2021 (addition) 1 individual	13/07/2022	NIL
43	HD PUNJAB (Addition) 8 individuals	14/03/2023	NIL
44	SO(IS-1)4-02/2021 (addition) 5 individual	13/12/2022	NIL



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45	SO(IS-I)4-02/2021 (addition) 5 individual	13/12/2022	NIL
46	HD PUNJAB (Addition) 8 individuals	12/06/2023	NIL
47	HD PUNJAB (Addition) 1 individual	12/06/2023	NIL
48	HD KPK(ADDITION) 4 individuals	12/06/2023	NIL
49	HD Punjab - Addition dated 11.11.22 (4 Individuals)	11/11/2022	NIL
50	SO(IS-I)4-02/2021 (addition) 1 individual MOFA	11/10/2022	NIL
51	SO(IS-I)4-02/2021 (addition) 1 individual - MOFA	11/10/2022	NIL
52	SO(IS-I)4-02/2021 (addition) 3 individuals	10/11/2022	NIL
53	HD PUNJAB (Addition) 5 individuals	10/04/2023	NIL
54	SO(IS-I)4-02/2021 (addition) 233 individual	09/09/2022	NIL
55	HD PUNJAB (Addition) 8 individuals	09/05/2023	NIL
56	HD Punjab - Addition dated 08.12.22 (4 Individuals)	08/12/2022	NIL
57	SO(IS-I)4-02/2021 (addition) 59 individual	08/09/2022	NIL
58	SO(IS-I)4-02/2021 (addition) 4 individual khanewal	08/09/2022	NIL
59	HD KPK(addition)1 individual-HARIPUR	08/02/2023	NIL
60	HD Punjab Addition -Faisalabad	07/12/2022	NIL
61	SO(IS-I)4-02/2021 (addition) 20 individual	07/07/2022	NIL
62	SO(IS-I)4-02/2021 (addition) 12 individual	07/07/2022	NIL
63	SO(IS-I)4-02/2021 (addition) 10 individual	07/07/2022	NIL
64	SO(IS-I)4-02/2021 (addition) 3 individual	06/07/2022	NIL
65	SO(IS-I)4-02/2021 (addition) 28 individual	06/07/2022	NIL
66	SO(IS-I)4-02/2021 (addition) 1 individual	07/07/2022	NIL
67	SO(IS-I)4-02/2021 (addition) Lodhran 3 individual	06/07/2022	NIL
68	HD PUNJAB (Addition) 5 individuals	05/06/2023	NIL
69	SO(IS-I)4-02/2021 (addition) 5 individual	04/08/2022	NIL
70	SO(IS-I)4-02/2021 (addition)RYKHAN 7 individual	04/07/2022	NIL
71	HD PUNJAB (Addition) 4 individuals	04/05/2023	NIL
72	HD PUNJAB (Addition) 2 individuals	04/04/2023	NIL
73	HD BALOCHISTAN(addition)11 individuals	04/04/2023	NIL
74	SO(IS-I)4-02/2021 (addition) 1 individual -Jhelum	03/10/2022	NIL
75	HD PUNJAB (Addition) 7 individuals	04/04/2023	NIL
76	SO(IS-I)4-02/2021 (addition) 1 individual	02/12/2022	NIL
77	SO(IS-I)4-02/2021 (addition) 5 individual	02/09/2022	NIL
78	HD PUNJAB (Addition) 1 individual	02/02/2023	NIL

