



SECURITIES AND EXCHANGE COMMISSION OF PAKISTAN

Adjudication Department- I

Adjudication Division

ORDER	
Name of Company:	Legend Financial Services Limited
Show Cause Notice No. & Date:	No. SCD/ADJ-I/Legend/161/2024/437 dated October 01, 2024
Respondents:	Legend Financial Services Limited
Date(s) of Hearing(s):	(i) November 26, 2024; and (ii) December 16, 2024
Case represented by:	(i) Mr. Mr. Shahid Munir, Director/ CEO; (ii) Mr. Abid Azim, CFO;
Provisions of law involved:	Regulations 4 and 25 of the Securities and Exchange Commission of Pakistan (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2020 read with Clause A, B and D of SRO 920 in conformance with SRO 197 and 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
Date of Order:	March 26, 2025

This Order shall dispose of the proceedings initiated by the Securities and Exchange Commission of Pakistan (the **"Commission"**) through the Show Cause Notice No. SCD/ADJ-I/Legend/161/2024/437 dated October 01, 2024 (the **"SCN"**) against Legend Financial Services Limited (the **"Company"**) issued under Regulation 31 of the Securities and Exchange Commission of Pakistan (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2020 (the **"Regulations"**) read with Section 6(A)(2)(h) of the Anti-Money Laundering Act, 2010 (the **"AML Act"**) and Rule 4(1)(a) and 6(1) of the AML/ CFT Sanction Rules, 2020 (the **"Rules"**).

2. The brief facts of the case are that the Company was incorporated on November 22, 2022, as a Public Unlisted Company under the Companies Act, 2017 (the **"Act"**) and licensed by the Commission on March 10, 2023 to undertake Investment Finance Services (**"IFS"**) as a Non-Banking Finance Company (**"NBFC"**) under the Non-Banking Finance Companies (Establishment and Regulation) Rules, 2003 (the **"NBFC Rules"**).

3. The Commission issued Statutory Regulatory Order No. 920(I)/2020 dated September 28, 2020 (the **"SRO 920"**) and subsequent SRO 197(I)/2021 dated February 12, 2021 (the **"SRO 197"**) (herein collectively referred to as **SROs**), whereby, all Regulated Persons were directed to comply with the following reporting requirements and submit following information in the manner prescribed therein:

- Annual risk assessment and control/compliance assessment framework based on data and information as on March 31st, to be filed by April 30th of the same year;
- Quarterly information/ data on 30th of the subsequent month of every quarter;
- Notify the Commission and Ministry of Foreign Affairs in case a person is designated under United Nations Security Council Resolutions or the National Counter Terrorism Authority (**"NACTA"**) in case that person is designated under the Anti-Terrorism Act, 1997;
- 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. The record available with the Commission revealed that the Company failed to submit following Anti-Money Laundering (**"AML"**) submission since issuance of its NBFC license i.e. March 10, 2023, as required under the SROs:

- Annual risk assessment and control/ compliance assessment framework;
- Quarterly information/ data;
- Compliance report on Statutory Regulatory Orders within forty-eight (48) hours of receiving the same.

5. The Company, after the review of its compliance status by the Commission with clause B and D of the SROs from its date of license i.e. March 10, 2023 to October 31, 2023, was warned and advised vide letter dated February 22, 2024 to ensure compliance with the requirements of SROs in future. However the Company failed to make any submission as required under the SROs even after the advice.

6. The Commission vide email dated March 20, 2024 reminded the Company to submit requisite information in compliance of the SROs. The Company vide email dated March 22, 2024, *inter-alia*, submitted that:

"the Company is not yet operational and has not conducted any business since its inception due to the pending App Approval process for its Lending Business before the SECP. There are as such no risks, suspicions or risk assessments to be filed."

7. The Commission clarified the Company that all licensed entities are required to submit responses through AML portal in compliance of the SROs. However neither any further response nor the requisite information i.e. AML returns were submitted by the Company and accordingly the status of non-submission of requisite information under the SROs is tabulated below:

Sr. #	Clause of SROs	Due Date
Clause A (Annual Risk Assessment)		
1	FY 2023 (from date of license i.e. March 10, 2023 to March 31, 2023)	30-Apr-2023
2	FY 2024 (from April 01, 2023 to March 31, 2024)	30-Apr-2024
Clause B (Quarterly Information)		
3	1 st Quarter ended March 31, 2023	30-Apr-2023
4	2 nd Quarter ended June 30, 2023	30-July-2023
5	3 rd Quarter ended September 30, 2023	30-Oct-2023
6	4 th Quarter ended December 31, 2023	30-Jan-2024
7	1 st Quarter ended March 31, 2024	30-Apr-2024
8	2 nd Quarter ended June 30, 2024	30-July-2024
Clause D (Compliance Report on SROs)		
9	No. of SROs applicable after date of license i.e. March 10, 2023	224 instances

8. The aforementioned contraventions indicate that the Company, *prima-facie*, contravened the provisions of regulation 4 of the Regulations read with Clause A and B of the SRO 920 in conformance with the SRO 197, and regulation 25 of the Regulations read with Clause D of the SRO 920. The said contraventions attract the applicability of regulation 31 of the Regulations read with Section 6(A)(2)(h) of the AML Act and rule 4(1)(a) and 6(1) of the Rules. The relevant provisions of law are reproduced hereunder:

"SRO 920:

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");*
- 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:

"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 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, 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 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 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.

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;

Rules 4(1)(a) of the Rules:

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

Rule 6(1) of the Rules:

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

9. Taking cognizance of the matter, a SCN was served upon the Company to show the cause in writing as to why a penal action may not be taken against them for non-compliance with the aforesaid provisions. In response to the SCN, the Company, vide letter dated October 24, 2024, *inter-alia*, stated that:

- (i) It has not commenced operations since its inception as its primary business activity-- nano-lending through a digital application—is pending approval by the Commission. The Company has neither initiated business activities nor opened customer accounts, resultantly there were no transactions, suspicious activity reports, risk assessments or control frameworks that needed to be filed;
- (ii) It had no risks to assess, no data to report in quarterly filings and no identified matches or risks against the lists of proscribed persons/ entities under the Anti-Terrorism Act, 1997;
- (iii) All the compliance reports will be filed via portal within one week and we regret any inconvenience caused due to delays in compliance filing. Moreover timely compliance of reporting requirements will be ensured in future; and
- (iv) The non-compliance was unintentional as the Company was not operational, therefore, lenient view in the matter is requested.

10. In order to provide an opportunity of being heard to the Company, hearing in the matter was fixed for November 26, 2024; which was adjourned. In order to meet the ends of justice, another hearing was fixed on December 16, 2024 which was attended by Mr. Mr. Shahid Munir – CEO as Authorize Representative of the Company ("Authorized Representative") along with Mr. Abid Azim – Chief Financial Officer. The Authorized Representative during the hearing while reiterating the reply to SCN dated October 24, 2024, *inter-alia*, submitted that:

- (i) The default in filing the compliance reports as required under SROs is admitted. The SROs were not handled appropriately mainly due to non-operational status of the Company;
- (ii) Reports as required under clauses A and B of the SROs has been compiled while report under clause D will be completed in a weeks' time and the same will be filed through the portal; and
- (iii) Delayed reporting may be condoned and lenient view may be taken while deciding the matter.

11. Subsequent to the hearing, the Authorized Representative vide letter dated December 19, 2024 informed that the returns and compliance reports required under clauses A, B and D, respectively, of SRO 920 have submitted/ completed.

12. I have gone through the provisions of SROs and considered the facts of the case, available record of the Company, as well as written and verbal submissions of the Authorized Representative. I have also perused regulation 31 of the Regulations, rules 4(1)(a) & 6(1) of the Rules and Section 6(A)(2)(h) of the AML Act, which stipulates penal provisions for contravention of the afore-referred provisions of law. I have noted that in terms of regulations 4 and 25 of the Regulations read with SROs, the Company was required to submit its Annual risk assessment and control/ compliance assessment framework, Quarterly information/ data and Compliance reports on SROs within forty eight hours of receiving the same which it has failed to do so at the relevant point in time. It is observed that the adherence with the requirements prescribed through the SROs helps maintain market stability, regulatory oversight, legal compliance, and promotes trust in the financial system while safeguarding national and global security interests.

13. In a judgment passed by the Appellate Bench of the Commission in the matter of *AKD Investment Management Limited vs. Director Adjudication Department-I* (2024 CLD 762), it was held that "Appellant had the responsibility to strictly adhere to the relevant requirements outlined in the Anti-Money Laundering Regulations and subsequent rectification actions did not absolve the appellant from the committed violations-"

14. It is observed that the Company remained non-compliant with regulation 4 of the Regulations read with clause A and B of SRO 920 in conformance with SRO 197, detailed as under:

Sr. #	Name of Submission	Due Date	Submission Status	Delay # of Days
1	AML Annual Risk Assessment Report, 2023 (from date of license from March 10, 2023 to March 31, 2023)	30-Apr-2023	08-Dec-2024	588 days
2	AML Annual Risk Assessment Report, 2024 (from April 01, 2023 to March 31, 2024)	30-Apr-2024	Not Submitted	
3	1 st Quarter ended March 31, 2023 AML information /data report	30-Apr-2023	08-Dec-2024	588 days
4	2 nd Quarter ended June 30, 2023 AML information /data report	30-July-2023	08-Dec-2024	497 days
5	3 rd Quarter ended September 30, 2023 AML information /data report	30-Oct-2023	08-Dec-2024	405 days
6	4 th Quarter ended December 31, 2023 AML information /data report	30-Jan-2024	08-Dec-2024	313 days
7	1 st Quarter ended March 31, 2024 AML information /data report	30-Apr-2024	08-Dec-2024	222 days
8	2 nd Quarter ended June 30, 2024 AML information /data report	30-July-2024	08-Dec-2024	131 days

The Company also did not make compliance with respect to **224 number of instances** with the requirements of Regulation 25 of the AML/CFT Regulations read with clause D of the SRO 920 and till date had complied with filing of compliance report for only nine (9) instances.

15. Furthermore, the record available with the Commission transpires that the Company 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 as it submitted annual risk assessment report, 2023 with a delay of 588 days and the 6 quarterly information/ data reports from the quarter ended March 31, 2023 to quarter ended June 30, 2024

with a delay ranging from 131 days to 588 days. It is further observed that the Company has failed to submit the AML Annual Assessment Report, 2024 till date of this Order.

16. The Company has remained non-compliant in 224 number of instances (Annexure-A) as required under Regulation 25 of the AML/CFT Regulations read with clause D of SRO 920. It is observed that the compliance reports in nine (9) number of instances were submitted subsequent to the SCN and hearings i.e. on December 30, 2024, with a delay ranging between 8 months to 2 years for nine (9) compliance reports submitted. Additionally, regarding 215 remaining compliance reports against the SROs, the Company is still non-compliant.

17. It is observed that multiple instances of non-compliance with SRO 920 were identified during the AML thematic review of the Company for the period from November 01, 2023 to January 31, 2025 and the same have been taken up by the Commission with the company vide letter dated February 25, 2025 and subsequent email dated February 28, 2025.

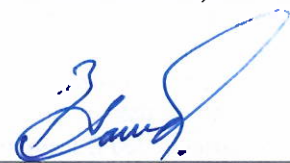
18. The argument of the Company that it has not commenced operations since its inception as its primary business activity--nano-lending through a digital application—is pending approval by the Commission is not based on facts as the Company never pursued its application for whitelisting of digital lending app.

19. The Company's understanding that it is not required to comply with the filing requirements outlined in the SROs, due to the lack of operations, customer accounts, and transactions, is not plausible. The intent of the legislature behind prescribing these filing requirements in the SROs is clear: the Company is still obligated to submit annual and quarterly reports, as well as compliance reports related to the SROs, on the AML portal, even if it has no business or customers.

20. In view of the afore-stated facts, circumstances and the admission made by the Authorized Representative, I am of the considered view that non-compliances/ contraventions of the Regulation 4 of the AML/CFT Regulations read with clause A and B of the SRO 920 in conformance with the SRO 197 and Regulation 25 of the AML/CFT Regulations read with clause D of the SRO 920 have been established which attract the applicability of regulation 31 of the Regulations read with rules 4(1)(a) and 6(1) of the Rules and Section 6A(2)(h) of the AML Act.

21. I, therefore, in exercise of powers conferred upon me under Section 6A(2)(h) of the AML Act, impose a penalty of **Rs.50,000/- (Rupees Fifty Thousand Only)** on the Company on account of established default. The Company is also advised to ensure meticulous compliance with all applicable laws of Anti Money Laundering and Countering Financing of Terrorism in true letter and spirit, henceforth.

22. The Company is hereby directed to deposit the afore-mentioned fine in the designated Bank Account maintained in the name of the Securities and Exchange Commission of Pakistan with MCB Bank Limited or United Bank Limited within thirty (30) days of the date of this Order and furnish receipted bank challan to the Commission forthwith. In case of failure to deposit the penalty, the proceedings under Section the proceedings under Section 485 of the Act will be initiated for recovery of the penalty/fines as arrears of land revenue pursuant to provision of Section 42B of the Securities and Exchange Commission of Pakistan Act, 1997 along with initiation of proceedings under Section 282J (5) of the Ordinance.



(Mahboob Ahmad)

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

Announced:

March 26, 2025
Islamabad.

Annexure-A

Sr. No.	SRO NO	UPLOAD DATE	Date	Submission Date
1	HD PUNJAB (Addition) 8 individuals	2023-03-13 12:10:17.531	13-Mar-2023	Not submitted
2	HD Punjab(addition)4 individual	2023-03-15 11:15:23.49	15-Mar-2023	Not submitted
3	hd punjab addition dated 15.03.2023 1 individual	2023-03-15 17:27:26.409	15-Mar-2023	Not submitted
4	HD PUNJAB ADDITION DATED 15.03.2023 1 INDIVIDUAL	2023-03-16 11:18:21.42	16-Mar-2023	Not submitted
5	SRO 357(I)/2023 DTD March 17 2023	2023-03-17 23:25:58.392	17-Mar-2023	Not submitted
6	HD KPK (Addition) 1 individual	2023-03-20 11:48:08.145	20-Mar-2023	Not submitted
7	HD PUNJAB (Addition) 4 individuals	2023-03-21 14:35:32.469	21-Mar-2023	Not submitted
8	HD BALOCHISTAN(addition)1 individual	2023-03-22 10:41:25.246	22-Mar-2023	Not submitted
9	HD PUNJAB (Addition) 8 individuals	2023-03-22 10:53:02.208	22-Mar-2023	Not submitted
10	HD Punjab(ammendments) 6 individuals	2023-03-22 11:01:57.748	22-Mar-2023	Not submitted
11	SRO 405	2023-04-03 09:47:42.616	03-Apr-2023	Not submitted
12	HD PUNJAB (Addition) 7 individuals	2023-04-03 16:04:59.239	03-Apr-2023	Not submitted
13	HD PUNJAB (ammendments) 3 individual	2023-04-04 09:52:41.889	04-Apr-2023	Not submitted
14	HD PUNJAB (Addition) 2 individuals	2023-04-04 10:03:27.241	04-Apr-2023	Not submitted
15	HD BALOCHISTAN(addition)11 individuals	2023-04-04 11:22:38.943	04-Apr-2023	2024-12-30 17:11:47.608
16	SRO 434	2023-04-10 09:45:53.074	10-Apr-2023	2024-12-17 22:54:47.412
17	HD PUNJAB (Addition) 5 individuals	2023-04-10 10:00:15.124	10-Apr-2023	Not submitted
18	HD PUNJAB (Addition) 8 individuals	2023-04-17 12:13:44.869	17-Apr-2023	Not submitted
19	HD Punjab(ammendments) 1 individual	2023-04-17 12:38:04.118	17-Apr-2023	2024-12-30 16:23:37.669
20	SRO 506- MOFA	2023-05-02 12:35:18.436	02-May-2023	Not submitted
21	HD Punjab(ammendments) 1 individual	2023-05-03 16:40:12.064	03-May-2023	Not submitted
22	HD PUNJAB (Addition) 4 individuals	2023-05-04 14:18:22.92	04-May-2023	Not submitted
23	HD Punjab(ammendments) 3 individuals	2023-05-04 14:37:39.55	04-May-2023	Not submitted
24	HD PUNJAB (Addition) 8 individuals	2023-05-09 10:16:37.193	09-May-2023	Not submitted
25	HD Punjab (ammendments) 5 individuals	2023-05-09 10:24:07.314	09-May-2023	Not submitted
26	HD PUNJAB (Addition) 13 individuals	2023-05-15 16:22:43.732	15-May-2023	Not submitted
27	HD PUNJAB (ammendments) 6 individuals	2023-05-15 16:46:51.997	15-May-2023	Not submitted
28	HD PUNJAB (Addition) 4 individuals	2023-05-15 16:55:56.282	15-May-2023	Not submitted
29	HD BALOCHISTAN(addition)1 individual	2023-05-22 10:45:45.316	22-May-2023	Not submitted
30	HD PUNJAB (Addition) 8 individuals	2023-05-22 16:54:16.781	22-May-2023	Not submitted
31	MOFA SRO 621/2023	2023-05-25 09:48:23.743	25-May-2023	Not submitted
32	HD PUNJAB (Addition) 2 individuals	2023-05-30 16:33:49.486	30-May-2023	Not submitted
33	HD PUNJAB (Addition) 2 individuals	2023-05-31 09:58:53.936	31-May-2023	Not submitted
34	HD Punjab(ammendments) 3 individuals	2023-05-31 09:59:37.156	31-May-2023	Not submitted
35	HD Punjab(ammendments) 1 individual	2023-05-31 10:01:23.797	31-May-2023	Not submitted
36	HD PUNJAB (Addition) 5 individuals	2023-06-05 14:10:44.482	05-Jun-2023	Not submitted
37	HD PUNJAB (Addition) 8 individuals	2023-06-12 09:53:50.686	12-Jun-2023	Not submitted
38	MOFA 658	2023-06-12 10:10:26.467	12-Jun-2023	Not submitted
39	MOFA 656	2023-06-12 11:24:25.554	12-Jun-2023	Not submitted
40	HD KPK(ADDITION) 4 individuals	2023-06-12 11:43:34.289	12-Jun-2023	Not submitted
41	HD PUNJAB (Addition) 1 individual	2023-06-12 15:36:17.614	12-Jun-2023	Not submitted
42	HD PUNJAB (Addition) 4 individuals	2023-06-19 10:34:57.794	19-Jun-2023	Not submitted
43	HD PUNJAB (ammendments) 3 individual	2023-06-19 10:41:44.685	19-Jun-2023	Not submitted
44	HD PUNJAB (Addition) 2 individuals	2023-06-21 11:36:34.219	21-Jun-2023	Not submitted
45	HD KPK(Addition) 1 individual	2023-07-04 09:19:01.325	04-Jul-2023	Not submitted
46	HD PUNJAB (Addition) 2 individuals	2023-07-04 14:18:55.97	04-Jul-2023	Not submitted
47	HD KPK(addition)6 individuals	2023-07-07 17:37:33.351	07-Jul-2023	Not submitted
48	HD PUNJAB (Addition) 7 individuals	2023-07-10 15:54:34.256	10-Jul-2023	Not submitted

49	HD Punjab(ammendments) 5 individuals	2023-07-10 16:04:11.399	10-Jul-2023	Not submitted
50	HD PUNJAB (Addition) 5 individuals	2023-07-10 16:08:38.253	10-Jul-2023	Not submitted
51	HD Punjab(ammendments) 4 individuals	2023-07-10 17:21:02.144	10-Jul-2023	Not submitted
52	HD KPK (Addition) 1 individual	2023-07-10 17:51:34.243	10-Jul-2023	Not submitted
53	HD PUNJAB (Addition)5 individuals	2023-07-13 13:49:00.15	13-Jul-2023	Not submitted
54	HD PUNJAB (Addition) 1 individual	2023-07-13 13:56:52.444	13-Jul-2023	Not submitted
55	HD Punjab(ammendments) 1 individuals	2023-07-20 09:46:10.374	20-Jul-2023	Not submitted
56	MOFA SRO NO 936	2023-07-23 17:28:39.812	23-Jul-2023	Not submitted
57	HD PUNJAB (Addition) 1 individual	2023-07-27 15:03:36.055	27-Jul-2023	Not submitted
58	HD Punjab Addition 1 Individual	2023-08-01 17:34:34.576	01-Aug-2023	Not submitted
59	HD Punjab Addition 6 Individuals	2023-08-02 18:19:56.418	02-Aug-2023	Not submitted
60	HD BALOCHISTAN(addition)5 individuals	2023-08-03 16:36:42.937	03-Aug-2023	Not submitted
61	HD PUNJAB (Addition) 5 individuals	2023-08-07 15:14:24.216	07-Aug-2023	Not submitted
62	HD PUNJAB (ammendments) 3 individuals	2023-08-07 16:19:38.255	07-Aug-2023	Not submitted
63	HD PUNJAB (Addition) 5 individuals	2023-08-08 16:36:58.73	08-Aug-2023	Not submitted
64	HD Punjab(ammendments) 1 individual	2023-08-09 14:27:11.706	09-Aug-2023	Not submitted
65	HD PUNJAB (Addition) 1 individual	2023-08-10 09:48:10.709	10-Aug-2023	Not submitted
66	HD Punjab (ammendments) 5 individuals	2023-08-10 10:05:57.312	10-Aug-2023	Not submitted
67	HD PUNJAB (Addition)5 individuals	2023-08-10 10:13:27.31	10-Aug-2023	Not submitted
68	SRO 831(i) 2023	2023-08-15 12:07:42.193	15-Aug-2023	Not submitted
69	HD PUNJAB (Addition) 15 individuals	2023-08-15 16:54:40.073	15-Aug-2023	Not submitted
70	HD Punjab (ammendments) 5 individuals	2023-08-15 17:00:48.998	15-Aug-2023	Not submitted
71	HD PUNJAB (Addition) 3 individuals	2023-08-15 17:19:49.322	15-Aug-2023	Not submitted
72	HD Punjab(ammendments) 3 individuals	2023-08-16 10:26:27.534	16-Aug-2023	Not submitted
73	KNIC(KPe.o48) in Pakistan	2023-08-17 10:53:19.119	17-Aug-2023	Not submitted
74	HD PUNJAB (ammendments) 2 individual	2023-08-17 16:59:56.049	17-Aug-2023	Not submitted
75	HD KPK(ADDITION) 4 individuals	2023-08-18 15:12:00.362	18-Aug-2023	Not submitted
76	HD KPK(addition)4 individuals	2023-08-21 16:51:44.537	21-Aug-2023	Not submitted
77	HD PUNJAB (ammendments) 1 individual	2023-08-22 10:04:14.496	22-Aug-2023	Not submitted
78	SRO 1091 MOFA	2023-08-22 15:45:57.198	22-Aug-2023	Not submitted
79	HD BALOCHISTAN(addition)1 individual	2023-08-22 16:10:27.639	22-Aug-2023	Not submitted
80	HD PUNJAB (Addition)3 individuals	2023-08-23 18:33:22.532	23-Aug-2023	Not submitted
81	HD PUNJAB (ammendment) 1 individual	2023-08-25 15:16:00.843	25-Aug-2023	Not submitted
82	HD PUNJAB (Addition) 8 individuals	2023-08-25 17:04:16.148	25-Aug-2023	Not submitted
83	HD PUNJAB (ammendment) 1 individual	2023-08-25 17:17:34.874	25-Aug-2023	Not submitted
84	HD PUNJAB (ammendment) 1 individual	2023-09-14 10:45:55.712	14-Sep-2023	Not submitted
85	HD PUNJAB (Addition) 16 individuals	2023-10-02 19:44:21.638	02-Oct-2023	Not submitted
86	HD Punjab(ammendments) 1 individual	2023-10-02 19:54:31.863	02-Oct-2023	Not submitted
87	HD BALOCHISTAN(addition)1 individual	2023-10-06 12:22:14.719	06-Oct-2023	Not submitted
88	HD PUNJAB (Addition) 1 individual	2023-10-09 11:46:25.964	09-Oct-2023	Not submitted
89	MOFA SRO. 1416 (I)/ 2023	2023-10-13 11:34:51.996	13-Oct-2023	Not submitted
90	MOFA SRO. 1415 (I)/ 2023	2023-10-13 12:33:25.88	13-Oct-2023	Not submitted
91	HD Punjab(addition)1 individual	2023-10-19 09:26:14.821	19-Oct-2023	Not submitted
92	MOFA SRO. 1522(I)/2023	2023-11-08 16:44:13.795	08-Nov-2023	Not submitted
93	MOFA SRO. 1557(I)/2023	2023-11-14 15:45:45.694	14-Nov-2023	Not submitted
94	MOFA SRO. 1563 (I)/2023	2023-11-15 15:21:12.057	15-Nov-2023	Not submitted
95	SO(IS-I)10-53/2023	2023-12-11 12:54:40.041	11-Dec-2023	Not submitted
96	HD Punjab - Additions dated 12.12.23 (19 Individuals)	2023-12-12 12:53:18.803	12-Dec-2023	Not submitted
97	HD Punjab - Amendment dated 12.12.23 (1 Individual)	2023-12-12 12:54:34.09	12-Dec-2023	Not submitted
98	HD Punjab - Additions dated 14.12.23 (7 Individuals)	2023-12-14 10:21:48.092	14-Dec-2023	Not submitted

99	MOFA - S.R.O. 1792(I) 2023 Amendments 15.12.23	2023-12-15 15:06:15.026	15-Dec-2023	Not submitted
100	HD Punjab - Amendment dated 19.12.23 (1 Individual)	2023-12-19 10:56:20.412	19-Dec-2023	Not submitted
101	HD Punjab - Additions dated 19.12.23 (12 Individuals)	2023-12-19 10:57:36.163	19-Dec-2023	Not submitted
102	MOFA - sro-S.R.O 1821 2023 Amendments 19.12.23	2023-12-19 11:41:12.798	19-Dec-2023	Not submitted
103	MOFA sro-S.R.O. 1841 2023 - Amendments 20.12.23	2023-12-20 17:04:35.733	20-Dec-2023	Not submitted
104	HD Punjab - Additions dated 21.12.23 (4 Individuals)	2023-12-21 14:45:20.358	21-Dec-2023	Not submitted
105	HD Punjab Addition 13 Individuals	2023-12-26 12:09:36.378	26-Dec-2023	Not submitted
106	HD Punjab Addition 1 individual	2023-12-27 10:44:47.31	27-Dec-2023	Not submitted
107	HD PUNJAB ADDITION 8 INDIVIDUALS	2023-12-28 10:44:51.612	28-Dec-2023	Not submitted
108	HD GB Addition 1 individual	2024-01-05 17:14:53.15	05-Jan-2024	Not submitted
109	S.R.O. No. 12(I)/2024 - Amendments	2024-01-08 09:56:54.699	08-Jan-2024	Not submitted
110	S.R.O. No 13(I)/2024 - Amendments	2024-01-08 10:42:07.879	08-Jan-2024	Not submitted
111	HD Punjab - Additions dated 08.01.24 (20 Individuals)	2024-01-08 15:17:26.98	08-Jan-2024	Not submitted
112	HD Punjab - Additions dated 09.01.24 (11 Individuals)	2024-01-09 14:56:00.004	09-Jan-2024	Not submitted
113	HD Punjab - Additions dated 11.01.24 (5 Individuals)	2024-01-11 16:44:32.123	11-Jan-2024	Not submitted
114	S.R.O. No. 29(I)/2024 dated January 11, 2024	2024-01-12 09:48:19.636	12-Jan-2024	Not submitted
115	HD Punjab - Additions dated 16.01.24 (14 Individuals)	2024-01-16 14:35:59.889	16-Jan-2024	Not submitted
116	HD Punjab - Amendments dated 16.01.24 (9 Individuals)	2024-01-16 14:53:03.803	16-Jan-2024	Not submitted
117	HD Punjab Addition 2 Individuals	2024-01-19 21:39:34.861	19-Jan-2024	Not submitted
118	HD Punjab Ammendments dated 19.01.24 2 individuals	2024-01-19 21:58:35.658	19-Jan-2024	Not submitted
119	HD PUNJAB ADDITION 3 INDIVIDUALS	2024-01-23 17:53:12.608	23-Jan-2024	Not submitted
120	HD Punjab Addition 8 Individuals.	2024-02-06 16:02:00.499	06-Feb-2024	Not submitted
121	MOFA - SRO No. 65(I)/2024 Amendments 09-02-24	2024-02-09 21:03:51.731	09-Feb-2024	Not submitted
122	MOFA - SRO No. 66 /2024 dated 12th february 2024	2024-02-16 09:44:05.389	16-Feb-2024	Not submitted
123	HD KPK Addition dated 12-02-2024	2024-02-16 10:06:36.344	16-Feb-2024	Not submitted
124	HD Punjab addition dated 14-02-24 (23) individuals	2024-02-16 10:14:52.001	16-Feb-2024	Not submitted
125	HD Punjab Amendments dated 14-02-24 (16) Individuals	2024-02-16 10:16:30.277	16-Feb-2024	Not submitted
126	HD Punjab Addition 5 Individuals dated 16-02-24	2024-02-19 09:52:44.207	19-Feb-2024	Not submitted
127	HD Punjab Amendments 1 Individual 16-02-24	2024-02-19 09:56:56.24	19-Feb-2024	Not submitted
128	HD Punjab - Additions dated 20.02.24 (12 Individuals)	2024-02-20 16:25:58.633	20-Feb-2024	Not submitted
129	HD Punjab - Amendments dated 20.02.24 (1 Individual)	2024-02-20 16:33:43.316	20-Feb-2024	Not submitted
130	HD Punjab - Additions dated 20.02.24 (4 Individuals)	2024-02-21 10:43:57.661	21-Feb-2024	Not submitted
131	HD Punjab - Additions dated 21.02.24 (3 Individuals)	2024-02-21 16:06:01.113	21-Feb-2024	Not submitted
132	HD Punjab - Addition dated 22.02.24 (1 Individual)	2024-02-22 16:35:25.297	22-Feb-2024	Not submitted
133	MOFA-SRO 232(I)/2024 dated 21st February 2024	2024-02-23 22:04:51.764	23-Feb-2024	Not submitted
134	HD Punjab - Additions dated 26.02.24 (8 Individuals)	2024-02-26 12:42:46.421	26-Feb-2024	Not submitted
135	HD Punjab - Additions dated 26.02.24 (3 Individuals)	2024-02-26 15:43:44.288	26-Feb-2024	Not submitted
136	HD Punjab - Amendments dated 26.02.24 (2 Individuals)	2024-02-26 15:44:19.164	26-Feb-2024	Not submitted
137	HD Punjab - Additions dated 27.02.24 (4 Individuals)	2024-02-27 15:28:07.151	27-Feb-2024	Not submitted
138	HD Baluchistan Addition 2 Individuals	2024-02-27 16:11:28.806	27-Feb-2024	Not submitted
139	HD Punjab - Additions dated 28.02.24 (13 Individuals)	2024-02-28 12:49:45.863	28-Feb-2024	Not submitted
140	HD Punjab - Amendment dated 28.02.24 (1 Individual)	2024-02-28 12:50:30.137	28-Feb-2024	Not submitted
141	HD Punjab addition 1 individual	2024-03-04 17:48:01.748	04-Mar-2024	Not submitted
142	S.R.O. No. 347 dated 06.03.24	2024-03-06 17:02:27.503	06-Mar-2024	Not submitted
143	SRO 373	2024-03-09 23:48:14.878	09-Mar-2024	Not submitted
144	HD Punjab - Additions dated 11.03.24 (37 Individuals)	2024-03-11 12:40:53.652	11-Mar-2024	Not submitted
145	HD Punjab - Additions dated 11.03.24 (4 Individuals)	2024-03-11 14:55:56.652	11-Mar-2024	Not submitted
146	HD Punjab - Additions dated 12.03.24 (7 Individuals)	2024-03-12 09:34:31.81	12-Mar-2024	Not submitted
147	HD Punjab - Addition dated 14.03.24 (12 Individuals)	2024-03-14 14:20:24.54	14-Mar-2024	Not submitted
148	HD Punjab - Amendments dated 14.03.24 (6 Individuals)	2024-03-14 14:56:53.475	14-Mar-2024	Not submitted

149	hd punjab addition 1 individual dated 22-03-24	2024-03-24 05:02:05.141	24-Mar-2024	Not submitted
150	HD PUNJAB AMMENDMENT DATED 22-03-24	2024-03-24 05:04:24.169	24-Mar-2024	Not submitted
151	HD Punjab - Addition dated 25.03.24 (7 Individuals)	2024-03-25 15:15:09.766	25-Mar-2024	Not submitted
152	HD Punjab - Additions dated 26.03.24 (43 Individuals)	2024-03-26 12:10:11.766	26-Mar-2024	Not submitted
153	HD Punjab - Amendments dated 26.03.24 (28 Individuals)	2024-03-26 12:10:46.789	26-Mar-2024	Not submitted
154	HD Balochistan - Additions 01.04.24 (3 individuals)	2024-04-01 14:29:37.612	01-Apr-2024	Not submitted
155	MOI - SRO No. 455(I)/ 2024	2024-04-03 09:54:21.174	03-Apr-2024	Not submitted
156	HD Punjab - Additions dated 03.04.24 (18 Individuals)	2024-04-03 11:34:25.199	03-Apr-2024	Not submitted
157	HD Punjab - Amendments dated 03.04.24 (5 Individuals)	2024-04-03 11:55:42.308	03-Apr-2024	Not submitted
158	HD Punjab - Additions dated 04.04.24 (7 Individuals)	2024-04-04 09:53:00.569	04-Apr-2024	Not submitted
159	HD Punjab - Addition dated 04.04.24 (1 Individual)	2024-04-04 13:56:37.864	04-Apr-2024	Not submitted
160	HD Punjab - Addition dated 05.04.24 (1 Individual)	2024-04-05 09:36:10.624	05-Apr-2024	Not submitted
161	HD Punjab - Amendment dated 05.04.24 (1 Individual)	2024-04-05 09:37:48.48	05-Apr-2024	Not submitted
162	HD BALOCHISTAN ADDITION 2 INDIVIDUALS	2024-04-09 12:09:56.166	09-Apr-2024	Not submitted
163	S.R.O. No. 571(I)/2024 dated 16 April 2024	2024-04-16 15:41:31.206	16-Apr-2024	Not submitted
164	HD Punjab - Additions dated 23.04.24 (3 Individuals)	2024-04-23 15:38:20.346	23-Apr-2024	Not submitted
165	HD Punjab - Additions dated 23.04.24 (7 Individuals)	2024-04-23 16:32:21.145	23-Apr-2024	Not submitted
166	MOFA- SRO- 625(I)/ 2024 Dated 28th April 2024	2024-04-28 16:44:20.8	28-Apr-2024	Not submitted
167	HD Punjab - Addition dated 30.04.24 (1 Individual)	2024-04-30 10:47:28.139	30-Apr-2024	Not submitted
168	HD Punjab - Addition dated 02.05.24 (1 Individual)	2024-05-02 15:55:19.738	02-May-2024	Not submitted
169	HD Punjab - Additions dated 02.05.24 (7 Individuals)	2024-05-02 16:51:40.774	02-May-2024	Not submitted
170	HD Punjab - Additions dated 03.05.24 (19 Individuals)	2024-05-03 10:32:25.885	03-May-2024	Not submitted
171	HD Punjab - Addition dated 13.05.24 (1 Individual)	2024-05-13 11:05:53.969	13-May-2024	Not submitted
172	HD Punjab - Additions dated 14.05.24 (9 Individuals)	2024-05-14 15:28:22.261	14-May-2024	Not submitted
173	HD Punjab - Additions dated 15.05.24 (5 Individuals)	2024-05-15 10:13:58.343	15-May-2024	2024-12-19 13:11:41.518
174	HD Punjab - Additions dated 16.05.24 (8 Individuals)	2024-05-16 12:39:29.22	16-May-2024	Not submitted
175	HD Punjab - Amendments dated 16.05.24 (2 Individuals)	2024-05-16 14:39:38.819	16-May-2024	2024-12-17 22:36:58.836
176	HD Punjab Addition 7 Individuals	2024-05-21 17:03:25.558	21-May-2024	Not submitted
177	HD Punjab Ammendments 1 Individual	2024-05-21 17:18:41.447	21-May-2024	Not submitted
178	HD Punjab - Additions dated 22.05.24 (30 Individuals)	2024-05-22 14:24:12.853	22-May-2024	Not submitted
179	HD Punjab - Amendments dated 22.05.24 (18 Individuals)	2024-05-22 15:15:33.777	22-May-2024	2024-12-17 22:42:09.422
180	HD Punjab - Amendment dated 23.05.24 (1 Individual)	2024-05-23 09:28:52.773	23-May-2024	Not submitted
181	HD Punjab - Additions dated 24.05.24 (07 Individuals)	2024-05-24 11:53:37.932	24-May-2024	Not submitted
182	S.R.O. No. 701(I)/2024 dated 23rd May 2024	2024-05-24 16:28:27.01	24-May-2024	Not submitted
183	HD Punjab - Addition dated 27.05.24 (1 individual)	2024-05-27 16:20:11.922	27-May-2024	Not submitted
184	HD Punjab Addition 5 individuals	2024-05-28 00:20:17.407	28-May-2024	Not submitted
185	HD Punjab - Amendments dated 03.06.24 (8 Individuals)	2024-06-03 16:41:32.765	03-Jun-2024	2024-12-17 22:38:12.1
186	HD Punjab - Additions dated 04.06.24 (8 Individuals)	2024-06-04 12:06:07.92	04-Jun-2024	Not submitted
187	HD Punjab - Addition dated 06.06.24 (1 individual)	2024-06-06 11:33:10.556	06-Jun-2024	Not submitted
188	Amendment HD Punjab. 1 individual	2024-06-07 17:45:34.01	07-Jun-2024	Not submitted
189	HD Punjab Ammendment 1 individual	2024-06-13 17:26:28.242	13-Jun-2024	Not submitted
190	HD Punjab Addition 43 Individuals	2024-06-24 18:51:06.479	24-Jun-2024	Not submitted
191	HD Punjab Addition 2 Individuals	2024-06-24 23:07:02.269	24-Jun-2024	Not submitted
192	HD Punjab Ammendments 21 individuals	2024-06-24 23:28:08.985	24-Jun-2024	Not submitted
193	HD KP - Amendment dated 01.07.24 (1 Individual)	2024-07-01 10:32:08.496	01-Jul-2024	Not submitted
194	HD Punjab - Additions dated 02.07.24 (5 Individuals)	2024-07-02 11:42:07.869	02-Jul-2024	Not submitted
195	HD KP - Additions dated 04.07.24 (15 individuals)	2024-07-04 10:04:15.436	04-Jul-2024	Not submitted
196	HD KP - Additions dated 04.07.24 (19 individuals)	2024-07-04 10:57:12.907	04-Jul-2024	Not submitted
197	HD KP - Additions dated 09.07.24 (18 individuals)	2024-07-09 14:59:03.036	09-Jul-2024	Not submitted
198	HD KP - Additions dated 09.07.24 (20 individuals)	2024-07-09 15:13:16.391	09-Jul-2024	Not submitted

199	MOI-SRO. NO. 1041 (I) /2024.	2024-07-19 20:22:36.178	19-Jul-2024	Not submitted
200	HD Punjab - Additions dated 23.07.24 (4 Individuals)	2024-07-23 15:19:36.055	23-Jul-2024	Not submitted
201	HD Punjab Additions 7 individuals	2024-07-26 17:59:21.225	26-Jul-2024	Not submitted
202	MOI- SRO NO. 1067(I)/2024.	2024-07-26 18:54:30.128	26-Jul-2024	Not submitted
203	HD KP - Addition dated 29.07.24 (1 individual)	2024-07-29 10:05:02.08	29-Jul-2024	Not submitted
204	HD Punjab - Additions dated 30.07.24 (2 Individuals)	2024-07-30 10:33:59.366	30-Jul-2024	Not submitted
205	MOFA- SRO NO. 1145(I)/2024.	2024-08-02 17:42:18.319	02-Aug-2024	Not submitted
206	HD Punjab - Additions dated 05.08.24 (5 individuals)	2024-08-05 10:34:19.94	05-Aug-2024	Not submitted
207	HD Punjab - Additions dated 08.08.24 (65 Individuals)	2024-08-08 11:36:07.103	08-Aug-2024	2024-12-30 16:33:38.901
208	HD Punjab - Amendments dated 08.08.24 (32 individuals)	2024-08-08 11:37:55.402	08-Aug-2024	Not submitted
209	HD Punjab Addition 1 Individual	2024-08-08 17:43:08.115	08-Aug-2024	Not submitted
210	HD Punjab Addition 16 Individuals	2024-08-16 16:21:01.198	16-Aug-2024	Not submitted
211	HD Punjab Amendments 4 Individuals	2024-08-16 16:42:17.728	16-Aug-2024	Not submitted
212	HD Punjab Additions 18 Individuals	2024-08-17 14:07:49.107	17-Aug-2024	Not submitted
213	HD PUNJAB ADDITIONS 3 INDIVIDUALS	2024-08-20 17:59:56.911	20-Aug-2024	Not submitted
214	HD Punjab - Addition dated 21.08.24 (1 Individual)	2024-08-21 10:24:36.739	21-Aug-2024	Not submitted
215	HD Punjab - Amendment dated 21.08.24 (1 Individual)	2024-08-21 10:25:57.622	21-Aug-2024	Not submitted
216	HD Punjab - Additions dated 21.08.24 (2 Individuals)	2024-08-21 16:10:55.036	21-Aug-2024	Not submitted
217	HD PUNJAB AMENDMENTS 2 INDIVIDUALS	2024-08-22 17:30:48.721	22-Aug-2024	Not submitted
218	hd punjab addition 1 individual	2024-08-22 17:33:57.537	22-Aug-2024	Not submitted
219	hd punjab addition 1 individual	2024-08-22 17:33:57.537	22-Aug-2024	Not submitted
220	MOFA SRO NO. 1287(I)/2024	2024-08-23 17:36:48.04	23-Aug-2024	Not submitted
221	MOFA SRO NO. 1289(I)/2024	2024-08-24 17:52:44.342	24-Aug-2024	Not submitted
222	HD Punjab - Additions dated 26.08.24 (7 individuals)	2024-08-26 14:27:49.48	26-Aug-2024	Not submitted
223	HD Punjab - Amendment dated 26.08.24 (1 individual)	2024-08-26 14:28:39.139	26-Aug-2024	Not submitted
224	HD Punjab - Additions dated 27.08.24 (76 individuals)	2024-08-27 17:16:57.328	27-Aug-2024	2024-12-03 22:45:54.223