



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

FIRST COMMODITIES (PVT) LIMITED

Show Cause Notice No. & Issue Date:	2(458)SMD/Adj-1/2024 dated June 28, 2024
Date(s) of Hearings:	August 06, 2024
Present at the Hearing	Mr. Muhammad Wasim Akhtar - Director (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 through the Show Cause Notice dated June 28, 2024 (the SCN) by the Securities and Exchange Commission of Pakistan (the Commission) against First Commodities (Pvt) Limited (the Respondent and/or the Company) on account of alleged contravention of SRO 920(I)/2020 dated September 28, 2020 (the SRO 920) and Regulation 25 and 27(1)(d) read with Regulation 31 of Securities and Exchange Commission of Pakistan (Anti Money Laundering and Countering Financing of Terrorism) Regulations, 2020 (the AML/CFT Regulations), 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 Sanctions Rules, 2020 (the AML/CFT Rules).

2. The Respondent is a Trading Right Entitlement Certificate (TREC) holder of Pakistan Mercantile Exchange Limited (PMEX). The Company is a regulated person as per definition stated at Clause (r) of Regulation 3(1) of the AML/CFT Regulations. Review of the Respondent was carried out by the inspection team of PMEX for the period July 01, 2023 to September 30, 2023 (the Review Period). The Respondent was non-compliant with the provisions of Clause D of the SRO and AML/CFT Regulations detailed as under:

- The Respondent failed to submit compliance reports in 99 instances (Annexure A) within due timeline as prescribed in Clause D of the SRO 920 read with Regulation 25 of the AML/CFT Regulations on SECP e-Services Portal.
- The Respondent has failed to provide any evidence in respect of existence of its independent audit function in compliance with the requirement of regulation 27(1)(d) of the AML/CFT Regulations.

3. The aforementioned non-compliances attract 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 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.



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- 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



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- 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."

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."

Regulation 27(1)(d) of the AML/CFT Regulations:

- "Compliance Program
(1) in order to implement compliance programs as set out in 7G of the AML Act, the regulated person shall implement policies, procedures and controls:
(d) an independent audit function to test the system."

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."

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 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."

4. 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 provided under Regulation 31 of the AML/CFT Regulations read with Rules 4(1)(a) and 6(1) of the AML Rules and Section 6(A)(2)(h) of the AML Act, may not be imposed on it for contravening the aforementioned provisions of the law. The Respondent failed to provide written response to the SCN.



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5. In order to provide the Respondent an opportunity of personal representation, hearing in the matter was fixed for August 06, 2024 which was attended by Mr. Muhammad Wasim Akhtar – Director, as its Authorized Representative (**the Representative**). During the course of hearing the Representative mentioned that their brokerage house is relatively new to the market and that they do not have much expertise and experience related to the brokerage business. The Company has less than ten active clients at the moment. The Respondent cited lack of knowledge and expertise as a reason for non-compliance with the provisions of AML/CFT Regulations. It was further submitted that the 99 SRO status instances have been complied with albeit with a delay. The Representative was also inquire regarding the independent audit function to which the Representative provided that Mr. Shafqat Mahmood is the internal auditor however, as per records, he is a consultant in the Company. The Commission requested a written reply stating the facts and proof of independent audit function and SRO compliance status after the hearing.

6. The Respondent vide letter dated August 13, 2024 stating the following:

"We humbly submit that we have taken over the management controls of First Commodities [Private] Limited [the "Company"] on June 15, 2021 and registered as Futures Broker under the Futures Brokers [Licensing and Operations] Regulations, 2018 with effect from May 11, 2022. After securing license, we practically started the operations during last quarter of 2022 with a few number of clients. Although, all practical purposes, we fully started the operations from July 2023 onward with limited number of staff in order to curtail the operational cost to the Company.

Further, as we were new in futures market business, therefore, our compliance staff overlooked the timely submission of the compliances of the SROs provided on Annexure-A to the SCN. However, as you have observed that after getting awareness through online awareness session arranged by Pakistan Mercantile Exchange Limited during last quarter of Year 2023, we submitted all pending SROs on December 18, 2023, obviously with inadvertent delays.

Therefore, we request your pardon for giving us leave ways considering those were our first ever non-compliances to date. We will make sure that in futures, all regulatory compliances will be done within due times as prescribed under the Regulatory Framework governing the Futures Brokers of the Pakistan Mercantile Exchange Limited.

This is to inform you that we have scanned and submitted all SROs as reported to us through SECP's eservices Portal to date and are making sure that no delays beyond fourth-eight [48] hours for confirming scanning and submitting the SROs will occurred in future."

7. I have examined the facts of the case in light of the applicable provisions of the law and have given due consideration to the allegations levelled against the Respondent in the matter. At this juncture, it is essential to address the following:

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

No, the Respondent did not make timely compliance of 99 instances within 48 hours as outlined in Clause D of SRO 920 during the review period with respect to Regulation 25 of the AML/CFT Regulations (Annexure-A). The Respondent has complied with the instances mentioned in the SCN with a delay and therefore, to be considered as subsequent compliance on part of the Respondent.

(ii) **Whether the Respondent developed an independent audit function?**

No, the Respondent has not developed an independent audit function till date of the Order. Regulation 27(1)(d) of the AML/CFT Regulations mandates that regulated entities must implement policies, procedures, and controls that include an independent audit function to test their AML/CFT



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systems. This is a non-negotiable requirement aimed at ensuring the effectiveness and robustness of AML/CFT controls. The intent of this regulation is to ensure that AML/CFT systems are subject to regular, unbiased scrutiny to identify and address any weaknesses or non-compliance issues promptly. The Respondent admitted that they did not have an independent audit function at the time of the review and further submitted that the independent audit function will be developed in the future. Therefore, the Respondent was found in contravention of Regulation 27(1)(d) of the AML/CFT Regulations.

(iii) **Whether the subsequent compliance absolve of the Respondent from Default?**

The Subsequent compliance does not absolve the Respondent from the default. There is no exception in law for timely compliance, therefore, Respondent's failure to comply in a timely manner with the afore-said requirements remains a regulatory breach and does not absolve the Respondent from the default.

8. In view of the foregoing, non-compliances/ contraventions of the Regulation 25 and 27(1)(d) 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 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. Therefore, I, in terms of powers conferred upon me under 6(A)(2)(h) of the AML Act, impose a penalty of **Rs. 150,000/- (Rupees One Hundred and Fifty Thousand Only)** on the Respondent on account of established default.

9. The Respondent 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.

10. The Respondent is hereby directed to deposit the aforesaid fine in the designated bank account maintained in the name of Securities and Exchange Commission of Pakistan with MCB Bank Limited or United Bank Limited within thirty (30) days from the date of this Order and furnish receipted voucher issued in the name of the Commission for information and record.

11. This Order is issued without prejudice to any other action that the Commission may initiate against the Company and/or its CEO 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:

October 07, 2024
Islamabad

ANNEXURE - A

S.No	SRO_NO	SRO_SOURCE	SRO_UPLOAD_DATE	SRO_DATE	RESPONSE_DATE
1	HD PUNJAB (Addition) 2 individuals	NACTA	2023-07-04-14.18.55.970000	04/07/2023	2023-12-18-15.58.11.339000
2	HD PUNJAB (deletion) 1 Individual	NACTA	2023-07-07-17.24.42.973000	07/07/2023	2023-12-18-15.17.59.153000
3	HD PUNJAB (deletion) 1 Individual	NACTA	2023-07-07-17.25.54.638000	07/07/2023	2023-12-18-15.05.07.481000
4	HD KPK(addition)6 individuals	NACTA	2023-07-07-17.37.33.351000	07/07/2023	2023-12-18-15.42.52.234000
5	HD KPK(deletion) 1 individual	NACTA	2023-07-07-17.41.21.779000	07/07/2023	2023-12-18-15.19.13.610000
6	HD KPK(deletion) 1 individual	NACTA	2023-07-07-17.45.19.636000	07/07/2023	2023-12-18-15.34.06.791000
7	HD PUNJAB (Addition) 7 individuals	NACTA	2023-07-10-15.54.34.256000	10/07/2023	2023-12-18-15.38.39.980000
8	HD Punjab(ammendments) 5 Individuals	NACTA	2023-07-10-16.04.11.399000	10/07/2023	2023-12-18-15.39.02.547000
9	HD PUNJAB (Addition) 5 individuals	NACTA	2023-07-10-16.08.38.253000	10/07/2023	2023-12-18-15.59.52.294000
10	HD Punjab(ammendments) 4 individuals	NACTA	2023-07-10-17.21.02.144000	10/07/2023	2023-12-18-16.00.01.096000
11	HD KPK(deletion) 6 individuals	NACTA	2023-07-10-17.42.58.149000	10/07/2023	2023-12-18-16.31.52.513000
12	HD KPK(deletion) 3 individuals	NACTA	2023-07-10-17.44.40.168000	10/07/2023	2023-12-18-16.09.10.819000
13	HD KPK(deletion) 5 individuals	NACTA	2023-07-10-17.46.24.801000	10/07/2023	2023-12-18-15.52.02.047000
14	HD KPK (Addition) 1 individual	NACTA	2023-07-10-17.51.34.243000	10/07/2023	2023-12-18-15.48.23.188000
15	HD Punjab(deletion) 3 individuals	NACTA	2023-07-12-08.59.23.544000	12/07/2023	2023-12-18-15.11.00.277000
16	HD PUNJAB (Addition)5 Individuals	NACTA	2023-07-13-13.49.00.150000	13/07/2023	2023-12-18-16.42.12.020000
17	HD PUNJAB (Addition) 1 individual	NACTA	2023-07-13-13.56.52.444000	13/07/2023	2023-12-18-16.36.29.379000
18	HD PUNJAB (deletion) 4 Individuals	NACTA	2023-07-14-18.13.12.347000	14/07/2023	2023-12-18-15.33.28.741000
19	HD KPK(deletion) 15 Individual	NACTA	2023-07-17-17.00.42.611000	17/07/2023	2023-12-18-15.38.46.345000
20	HD Punjab(ammendments) 1 Individuals	NACTA	2023-07-20-09.46.10.374000	20/07/2023	2023-12-18-15.56.19.268000
21	MOFA SRO NO 936	NACTA	2023-07-23-17.28.39.812000	23/07/2023	2023-12-18-15.40.10.151000
22	HD PUNJAB (deletion) 1 individual	NACTA	2023-07-24-09.38.16.967000	24/07/2023	2023-12-18-15.41.14.173000
23	HD PUNJAB (deletion) 1 individual	NACTA	2023-07-24-12.11.16.667000	24/07/2023	2023-12-18-15.42.33.297000
24	HD PUNJAB (deletion) 1 Individual	NACTA	2023-07-25-10.34.16.505000	25/07/2023	2023-12-18-15.47.49.016000
25	HD PUNJAB (deletion) 1 Individual	NACTA	2023-07-26-15.33.17.997000	26/07/2023	2023-12-18-15.54.34.977000
26	HD PUNJAB (Addition) 1 Individual	NACTA	2023-07-27-15.03.36.055000	27/07/2023	2023-12-18-15.42.09.465000
27	HD Punjab deletion - 2 Individuals	NACTA	2023-08-01-10.23.37.492000	01/08/2023	2023-12-18-15.23.43.264000
28	HD Punjab Addition 1 Individual	NACTA	2023-08-01-17.34.34.576000	01/08/2023	2023-12-18-15.54.45.795000
29	HD Punjab deletion - 1 Individual	NACTA	2023-08-02-11.52.32.783000	02/08/2023	2023-12-18-15.33.50.885000
30	HD Punjab deletion - 4 individuals	NACTA	2023-08-02-15.31.27.772000	02/08/2023	2023-12-18-16.41.02.536000
31	HD KPK Deletion 22 individuals 02.08.2023	NACTA	2023-08-02-17.39.19.745000	02/08/2023	2023-12-18-15.55.57.152000
32	HD KPK Deletion 22 individuals 02.08.2023	NACTA	2023-08-02-17.39.19.745000	02/08/2023	2023-12-18-15.58.29.371000
33	HD Punjab Addition 6 Individuals	NACTA	2023-08-02-18.19.56.418000	02/08/2023	2023-12-18-15.10.14.606000
34	HD Punjab deletion - 6 Individuals	NACTA	2023-08-02-18.45.21.382000	02/08/2023	2023-12-18-15.37.58.399000
35	HD BALOCHISTAN(deletion)2 Individuals	NACTA	2023-08-03-16.32.41.897000	03/08/2023	2023-12-18-15.24.13.448000
36	HD BALOCHISTAN(addition)5 Individuals	NACTA	2023-08-03-16.36.42.937000	03/08/2023	2023-12-18-15.40.20.328000
37	HD KPK(DELETION)1 individual	NACTA	2023-08-04-14.49.56.523000	04/08/2023	2023-12-18-15.57.32.391000
38	HD PUNJAB (deletion) 1 individual	NACTA	2023-08-07-09.39.19.738000	07/08/2023	2023-12-18-15.09.14.103000
39	HD PUNJAB (Addition) 5 individuals	NACTA	2023-08-07-15.14.24.216000	07/08/2023	2023-12-18-15.33.48.196000
40	HD PUNJAB (deletion) 11 Individual	NACTA	2023-08-07-16.14.13.385000	07/08/2023	2023-12-18-16.32.14.460000
41	HD PUNJAB (ammendments) 3 Individuals	NACTA	2023-08-07-16.19.38.255000	07/08/2023	2023-12-18-16.39.26.339000
42	HD PUNJAB (Addition) 5 individuals	NACTA	2023-08-08-16.36.58.730000	08/08/2023	2023-12-18-15.24.40.528000
43	HD PUNJAB (deletion) 1 Individual	NACTA	2023-08-08-16.41.50.471000	08/08/2023	2023-12-18-16.00.23.152000
44	HD PUNJAB (deletion) 3 Individual	NACTA	2023-08-08-17.02.33.181000	08/08/2023	2023-12-18-15.38.01.129000
45	HD PUNJAB (deletion) 2 individuals	NACTA	2023-08-09-09.35.21.561000	09/08/2023	2023-12-18-15.31.06.024000
46	HD Punjab(deletion) 8 individuals	NACTA	2023-08-09-14.18.18.077000	09/08/2023	2023-12-18-15.12.00.823000
47	HD Punjab(ammendments) 1 individual	NACTA	2023-08-09-14.27.11.706000	09/08/2023	2023-12-18-16.42.03.112000
48	HD PUNJAB (deletion) 2 individuals	NACTA	2023-08-09-14.44.58.764000	09/08/2023	2023-12-18-15.25.50.307000
49	HD PUNJAB (Addition) 1 Individual	NACTA	2023-08-10-09.48.10.709000	10/08/2023	2023-12-18-16.07.38.438000
50	HD Punjab (ammendments) 5 individuals	NACTA	2023-08-10-10.05.57.312000	10/08/2023	2023-12-18-15.39.25.895000
51	HD PUNJAB (Addition)5 individuals	NACTA	2023-08-10-10.13.27.310000	10/08/2023	2023-12-18-15.25.22.798000
52	HD PUNJAB (DELETION)1 individual	NACTA	2023-08-10-10.32.39.136000	10/08/2023	2023-12-18-15.50.47.576000
53	HD PUNJAB (deletion) 1 Individual	NACTA	2023-08-11-09.30.35.929000	11/08/2023	2023-12-18-15.14.42.898000
54	SRO 831(I) 2023	UNSCR	2023-08-15-12.07.42.193000	15/08/2023	2023-12-18-15.34.22.211000
55	HD PUNJAB (Addition) 15 Individuals	NACTA	2023-08-15-16.54.40.073000	15/08/2023	2023-12-18-16.00.01.584000
56	HD Punjab (ammendments) 5 individuals	NACTA	2023-08-15-17.00.48.998000	15/08/2023	2023-12-18-16.38.29.226000
57	HD PUNJAB (deletion)22 Individual	NACTA	2023-08-15-17.16.43.944000	15/08/2023	2023-12-18-15.31.40.503000
58	HD PUNJAB (Addition) 3 Individuals	NACTA	2023-08-15-17.19.49.322000	15/08/2023	2023-12-18-15.57.20.139000
59	HD PUNJAB (deletion) 2 individual	NACTA	2023-08-16-09.57.21.840000	16/08/2023	2023-12-18-15.15.04.894000
60	HD PUNJAB (DELETION) 3 individuals	NACTA	2023-08-16-10.20.04.449000	16/08/2023	2023-12-18-15.26.17.721000
61	HD Punjab(ammendments) 3 individuals	NACTA	2023-08-16-10.26.27.534000	16/08/2023	2023-12-18-15.57.11.388000
62	HD PUNJAB (deletion) 4 individual	NACTA	2023-08-16-17.25.23.089000	16/08/2023	2023-12-18-15.25.24.987000
63	HD KPK(deletion) 1 individual	NACTA	2023-08-16-17.49.31.034000	16/08/2023	2023-12-18-15.51.05.394000
64	KNIC(KPe.048) in Pakistan	UNSCR	2023-08-17-10.53.19.119000	17/08/2023	2023-12-18-16.38.18.448000
65	HD PUNJAB (ammendments) 2 individual	NACTA	2023-08-17-16.59.56.049000	17/08/2023	2023-12-18-15.36.47.201000
66	HD KPK(deletion) 2 individuals	NACTA	2023-08-18-15.07.30.856000	18/08/2023	2023-12-18-15.34.17.722000
67	HD KPK(ADDITION) 4 individuals	NACTA	2023-08-18-15.12.00.362000	18/08/2023	2023-12-18-16.06.53.750000
68	HD PUNJAB (deletion) 25 individuals	NACTA	2023-08-18-16.48.27.161000	18/08/2023	2023-12-18-15.22.01.328000
69	HD PUNJAB (deletion) 4 individuals	NACTA	2023-08-18-17.12.22.986000	18/08/2023	2023-12-18-15.52.35.552000
70	HD PUNJAB (deletion) 1 individual	NACTA	2023-08-18-17.16.36.228000	18/08/2023	2023-12-18-16.41.52.407000

71	HD KPK(addition)4 individuals	NACTA	2023-08-21-16 51 44 537000	21/08/2023	2023-12-13-18.14.31.898000
72	HD KPK(deletion) 2 individuals	NACTA	2023-08-21-16.55 04 538000	21/08/2023	2023-12-18-16.37 09 618000
73	HD PUNJAB (deletion) 9 individual	NACTA	2023-08-21-17 07 01 718000	21/08/2023	2023-12-18-15 32 19.603000
74	HD PUNJAB (deletion) 3 individual	NACTA	2023-08-21-17 18 06 136000	21/08/2023	2023-12-18-15.17 55 971000
75	HD PUNJAB (deletion) 1 individual	NACTA	2023-08-22-09.39.55.246000	22/08/2023	2023-12-18-15 49.51 038000
76	HD PUNJAB (amendments) 1 individual	NACTA	2023-08-22-10.04.14 496000	22/08/2023	2023-12-18-15.44.03.871000
77	SRO 1091 MOFA	UNSCR	2023-08-22-15.45.57.198000	22/08/2023	2023-12-18-15.36.04.050000
78	HD BALOCHISTAN(addition)1 individual	NACTA	2023-08-22-16.10.27.639000	22/08/2023	2023-12-18-15.04 43.140000
79	HD PUNJAB (deletion) 16 individual	NACTA	2023-08-22-16.29.17.811000	22/08/2023	2023-12-18-15.44.05.983000
80	HD PUNJAB (Addition)3 individuals	NACTA	2023-08-23-18.33.22.532000	23/08/2023	2023-12-18-15.52.58.555000
81	TEHREEK E LABAIK - REMOVAL	NACTA	2023-08-24-16.32 20 494000	24/08/2023	2023-12-18-16.09.14.014000
82	HD PUNJAB (deletion) 7 individual	NACTA	2023-08-25-15.13.24.991000	25/08/2023	2023-12-18-15.28.28.559000
83	HD PUNJAB (amendment) 1 individual	NACTA	2023-08-25-15.16 00.843000	25/08/2023	2023-12-18-16.42.38.004000
84	HD PUNJAB (Addition) 8 individuals	NACTA	2023-08-25-17.04 16.148000	25/08/2023	2023-12-18-15.40 06.947000
85	HD PUNJAB (deletion)2 individual	NACTA	2023-08-25-17.12 39 447000	25/08/2023	2023-12-18-15.50.25.679000
86	HD PUNJAB (amendment) 1 individual	NACTA	2023-08-25-17.17.34 874000	25/08/2023	2023-12-18-16.00 46.144000
87	HD Punjab(deletion) 4 individuals	NACTA	2023-08-29-14.28.52.562000	29/08/2023	2023-12-18-15.21.13.021000
88	HD PUNJAB (deletion) 1 individual	NACTA	2023-08-29-16 43.35.204000	29/08/2023	2023-12-18-16.44.08.131000
89	HD PUNJAB (deletion) 1 individual	NACTA	2023-08-31-10.13.54.502000	31/08/2023	2023-12-18-15.16.20.622000
90	HD PUNJAB (deletion)3 individuals	NACTA	2023-08-31-10.39.06.144000	31/08/2023	2023-12-18-15.14.09.392000
91	HD PUNJAB (deletion) 1 individual	NACTA	2023-08-31-14.59.22.132000	31/08/2023	2023-12-18-15.52.45.907000
92	HD PUNJAB (deletion) 1 individual	NACTA	2023-08-31-16.09.24.974000	31/08/2023	2023-12-18-15.31.31.959000
93	HD PUNJAB (deletion) 13 individual	NACTA	2023-09-07-17.05.05.208000	07/09/2023	2023-12-18-16.31.12.740000
94	HD PUNJAB (DELETION)9 individuals	NACTA	2023-09-08-10.00.19.005000	08/09/2023	2023-12-18-15.55.08.150000
95	HD PUNJAB (deletion) 1 individual	NACTA	2023-09-13-09.42.01.457000	13/09/2023	2023-12-18-15.34.53.742000
96	HD PUNJAB (deletion) 17 individuals	NACTA	2023-09-14-10.36.51.304000	14/09/2023	2023-12-18-16.36.50.807000
97	HD PUNJAB (amendment) 1 individual	NACTA	2023-09-14-10.45 55.712000	14/09/2023	2023-12-18-16.03.32.884000
98	HD PUNJAB (DELETION)1 individual	NACTA	2023-09-18-10.50.08 459000	18/09/2023	2023-12-18-15.27.16.592000
99	HD PUNJAB (deletion) 1 individual	NACTA	2023-09-19-17.02 31.792000	19/09/2023	2023-12-18-16.06.04.644000

