



# 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*

**LA MERCENCIA (PVT.) LIMITED**

Show Cause Notice No. & Issue Date:	2(450)SMD/Adj-1/2024-67 dated February 22, 2024
Date(s) of Hearings:	March 29, 2024; April 29, 2024; and May 07, 2024
Present at the Hearing	Mr. Muhammad Irfan, Chief Executive Officer (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 February 22, 2024 (the SCN) by the Securities and Exchange Commission of Pakistan (the Commission) against La Mercencia (Pvt.) Limited (the Respondent and/or the Company) on account of alleged contraventions of 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 SRO 920(I)/2020 dated September 28, 2020 (the SRO 920) in conformance with SRO197(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 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 was incorporated in Pakistan on March 07, 2012 as a Private Limited Company under the Companies Ordinance, 1984 (the Ordinance) (now the Companies Act, 2017). The Respondent is an active Trading Right Entitlement Certificate (TREC) holder of Pakistan Mercantile Exchange Limited (PMEX). The principle activities of the Respondent are to carry on the business of brokers, traders, dealers and representatives in all sort of approved commodities of PMEX. The Company is a regulated person as per definition stated at Clause (r) of Regulation 3(1) of the AML/CFT Regulations.

3. 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:

- Annual risk assessment and control/compliance assessment framework based on data and information as on March 31<sup>st</sup>, to be filed by April 30<sup>th</sup>;
- Quarterly information/ data on 30<sup>th</sup> of the subsequent month of every quarter;
- 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



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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 SRO 920 and SRO 197 for the period from **July 01, 2022 to June 30, 2023 (the Review Period)**, an explanation vide email dated November 14, 2023 and remainder vide email December 11, 2023, was sought from the Respondent with regards to the following observations. However, no response had been provided by the Respondent.

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

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

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

5. 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 the SRO 920 in conformance with SRO 197, and Regulation 25 of the AML/CFT Regulations read with clause D of the SRO 920.

6. 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 31<sup>st</sup> 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*





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*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."*



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

"In the aforesaid Notification, in section A, for their expression '30 June, to be filed by 31<sup>st</sup> July' the expression '31<sup>st</sup> March, to be filed by 30<sup>th</sup> 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, 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."

**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."

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





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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. However, the Respondent did not submit any reply in response to the SCN.

8. In order to provide the Respondent an opportunity of personal representation, hearing in the matter was fixed for March 29, 2024 wherein Mr. Muhammad Irfan, Chief Executive Officer (CEO) appeared as the Authorized Representative (**the Representative**) of the Respondent before the undersigned. During the course of hearing, the Representative stated that quarterly and annual reports have been submitted to Pakistan Mercantile Exchange (PMEX) in December, 2023. Furthermore, the Representative admitted the default and assured that the written reply would be provided in due course of time.

9. The Respondent was provided with an opportunity of personal representation after the change of Authorized Officer (AO), for which a hearing in the matter was fixed for April 29, 2024. The hearing was attended by the Representative. During the hearing, the Representative admitted the default and stated that such compliances were looked after by the Compliance Officer who has been under medical treatment for the past one year due to which these compliance reports were overlooked. Moreover, the Representative assured that the subsequent compliance would be done and requested to re-fix the hearing in the next week in order to provide the evidence of subsequent compliance.

10. Subsequent to the hearing, the Respondent vide letter dated April 29, 2024 submitted the written reply in response to the SCN as under:

*"First and foremost, I want to extend my apologies for the delay in responding to the notice. I understand the seriousness of the matter and the importance of timely communication with regulatory authorities. Please accept my sincerest apologies for any inconvenience caused by the delay in my response. Meanwhile we were engaged with PMEX in this regard, reference letters attached along with this letter.*

*I assure you that this delay was not intentional, and I am fully committed to cooperating with the Securities and Exchange Commission of Pakistan (SECP) to address any concerns raised in the notice.*

*I have thoroughly reviewed the allegations and requirements outlined in the Show Cause Notice, and I am in the process of compiling a comprehensive response. Rest assured, I am taking this matter seriously and will provide all necessary information and clarifications as per the regulatory requirements."*

11. Another hearing in the matter was fixed for May 07, 2024 wherein the Representative appeared in the hearing. During the hearing, the Representative submitted the written response vide letter dated May 07, 2024. The main contents of which are as under:

*"We have Complied and submitted response of all SRO's Mentioned in ANNEXURE-A except, Sr. No. 6,7,11,16,25,32,33,34,37,41,43,44,45,66,67,70,75,78.*

*These mentioned SRO's are not available on AML Portal.*

*Furthermore, we are in process of submitting AML Annual Risk assessment and AML Data Report for missing Quarters mentioned in the notice."*

12. The Representative reiterated the stance taken in the aforementioned written reply to the SCN and admitted the non-compliance on part of the Respondent. However, the Representative submitted



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that the alleged contraventions were not intentional on part of the Respondent and occurred due to absence of the compliance officer who has been under medical treatment for the past year one. Moreover, the Representative added that subsequent compliance has been done in respect to 65 out of 78 instances on May 06, 2024 and remaining 13 instances are not visible on the AML portal. Further, with respect to the Annual and Quarterly reports, there is an issue with the date which has been taken up with the relevant department of the Commission and would update the required reports once this issue would be resolved. During the hearing, the Representative was advised to ensure strict compliance with the requirements as envisaged in the SROs. The Representative assured that moving forward, the Respondent will remain compliant with the requirements of the SROs and such delays will not occur in future and requested for a lenient view.

13. Subsequent to the hearing, the Representative vide email dated May 07, 2024 forwarded the email which has been sent to the relevant department for correction in return period for Quarterly AML information/Data Report and has also given assurance that the Respondent would comply on time in future.

14. I have examined the facts of the case in light of the applicable provisions of the law and have given due consideration to the written as well as verbal submissions and arguments of the Respondent/Representative. I am of the considered view that:

- (i) **Whether the Respondent made timely compliance with the requirements of the SROs**  
No, the Respondent remained non-compliant with Regulation 4 of the AML/CFT Regulations read with clause A and B of SRO 920 in conformance with SRO 197, detailed as under:

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

It also did not make timely compliance with respect to **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 accordance with SRO 197, as the Respondent has still not submitted the aforesaid AML Annual Assessment Report and Quarter information /data report for the said period.

The Respondent has remained non-compliant in 78 number of instances as required under Regulation 25 of the AML/CFT Regulations read with clause D of SRO 920 with a delay ranging between 1 to 2 years for 65 (sixty-five) compliance reports submitted subsequent to the SCN and hearings i.e. on May 06, 2024. Additionally, regarding 13 remaining compliance reports against the SROs, the Respondent is still non-compliant.





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Furthermore, with regards to the correction in the return period for the Quarterly AML Information/Data Report, based on the available information, it has been observed that the Respondent has only submitted the AML report/return for the 1st Quarter of 2020 i.e. on May 07, 2024. The system was displaying 2020 AML returns because the Respondent had not submitted AML returns since 2020, and the system does not display upcoming returns until the previous ones are submitted. Additionally, the aforementioned annual returns have not been submitted yet, and in this regard, no evidence related to subsequent compliance has been provided by the Respondent.

(iii) **Whether lack of knowledge absolves Respondent from the default:**

The Representative admitted that the Respondent was unaware with the requirements of the aforementioned provisions of the law. However, it is important to note that lack of knowledge and non-availability of the Compliance officer do not absolve the Respondent from the default.

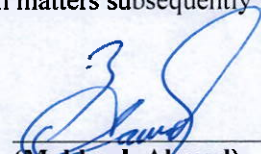
It has also been noted that the Respondent failed to take any action even lapse of considerable time. The Respondent made efforts in this regard only after issuance of the SCN and hearings. As per record, the Respondent has only subsequently complied with 65 numbers of instances whereas with respect to 13 remaining instances, AML Annual and Quarter reports for the aforesaid default period have not been submitted yet by the Respondent. Moreover, it is pertinent to mention here that timely submission of compliance reports is obligated on the Respondent, being a Regulated Entity/Person, which the Respondent failed to comply with.

15. 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 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 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 Section 6A(2)(h) of the AML Act, impose a penalty of **Rs.350,000/- (Rupees Three Hundred and Fifty Thousand Only)** on the Respondent on account of established default.

16. 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.

17. 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.

18. 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:**  
June 07, 2024  
Islamabad







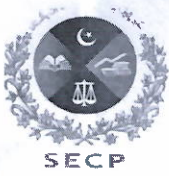
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### ANNEXURE-A

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-I)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-I)4-02/2021 (addition)5 individual	27/07/2022	NIL
8	HD PUNJAB (Addition) I 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-I)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-I)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-I)4-02/2021 (addition) 2 individual pakpattan	18/08/2022	NIL
29	SO(IS-I)4-02/2021 (addition) 2 individual	18/07/2022	NIL
30	HD PUNJAB (Addition) 8 individuals	17/04/2023	NIL
31	SO(IS-I)4-02/2021 (addition) 11 individual	17/01/2023	NIL
32	HD PUNJAB ADDITION DATED 15.03.2023 1 INDIVIDUAL	16/03/2022	NIL
33	SO(IS-I)4-02/2021 (addition) 19 individual	16/08/2022	NIL
34	SO(IS-I)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





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39	HD Punjab - Addition dated 14.11.22 (10) Individuals	14/11/2022	NIL
40	SO(IS-I)4-02/2021 (addition) 5 individual	14/07/2022	NIL
41	SO(IS-I)4-02/2021 (addition) 2 individual ABBOTTABAD	13/09/2022	NIL
42	SO(IS-I)4-02/2021 (addition) 1 Individual	13/07/2022	NIL
43	HD PUNJAB (Addition) 8 individuals	14/03/2023	NIL
44	SO(IS-I)4-02/2021 (addition) 5 individual	13/12/2022	NIL
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 (audition) 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	04/07/2023	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