

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২২২
তারিখঃ ফেব্রুয়ারি ০৬, ২০২৫

A A A Agro Enterprise
(BOID: 1205720075603052)
Koytra Horubari (Ambia Kotej)

বিষয়: আদেশ।

কমিশনের আদেশ নং- নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২২১ তারিখঃ ফেব্রুয়ারি ০২, ২০২৫ এর সত্যায়িত অনুলিপি
আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


06/02/2025

মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

IP PABX: 88-02-09609-100600, Ext- 1220

ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

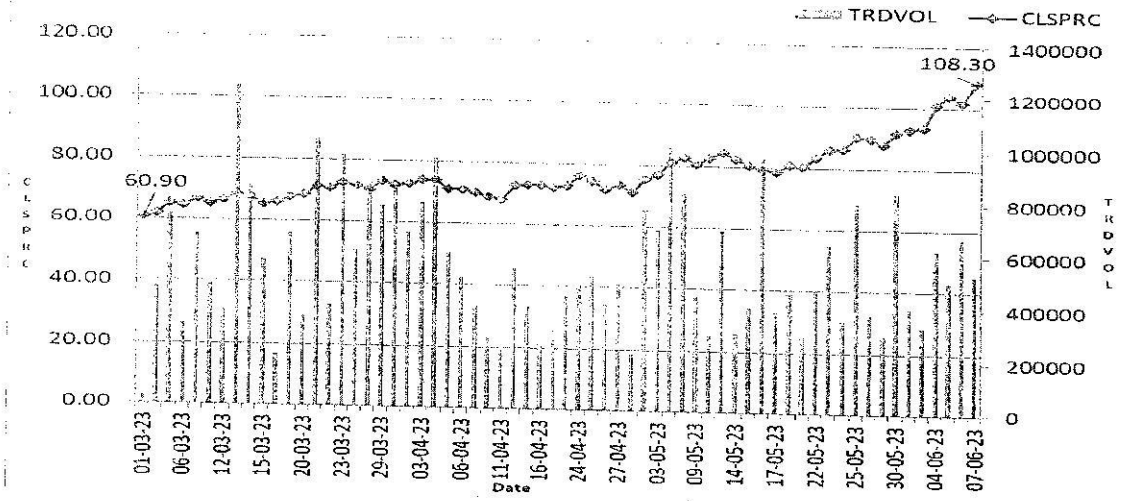
১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/Surveillance/2003-0097]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

আদেশ

যেহেতু, Securities and Exchange Ordinance, 1989 এর Section 2 (৩০) মোতাবেক কামরান অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, জুন ১১, ২০২৩ তারিখের DSE Surveillance Note # 42/2023 অনুযায়ী এবং Regulation 16(3)(c)(ii) মোতাবেক, সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন ০২.০৩.২০২৩ থেকে ০৭.০৬.২০২৩ পর্যন্ত সময়ে Fine Foods Limited (FINEFOODS)-এর শেয়ার লেনদেন সংক্রান্ত তদন্ত (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Trends of closing price and trade volume OF "FINEFOODS" in public market



Yesterday Closing Price (YCP) of the share of FINE FOODS LIMITED as on 02-03-2023 was Tk. 60.90 and closing price of the same was Tk. 108.30 as on 07-06-2023. During this period from 02-03-2023 to 07-06-2023, price of the share of FINE FOODS LIMITED was increased by Tk. 47.40 which is approximately 77.83% higher compared to closing price of 01-03-2023.

Observations and findings:

A. Trade details of Mohammad Shamsul Alam and associates:

Observation- 1:

Mohammad Shamsul Alam (Client code # 22232 of Stock & Bond Limited) was the 7th top buyer of FINEFOODS share from 02-03-2023 to 07-06-2023. After examining the relevant documents, it was found that the said client was associated with another account(s) from which they traded shares of "FINEFOODS" during the investigation period. Details are as follows:

[Signature]

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BOID	CLIENT	BO FATHER/	BO	
1203510068173076	22232	Mohammad Shamsul Alam	Stock & Bond Limited	Md. Abdur Rob
		RRAC FPI Stock Ltd		Ambia Khatun
				Joint A/C maintained with his wife Sajiya Jasmin Mohammad Shamsul Alam,
1205720075603052	04008	A A A Agro Enterprise	NLI Securities Limited	
				is the contact person & first applicant of this BOID
				Mohammad Shamsul Alam, CEO of A A A Agro Enterprise is the contact
1203510066591329	22260	Mohammed Jahangir Alam	Stock & Bond Limited	Md. Abdur Rob
				Ambia Khatun
				Brother of Mohammad Shamsul Alam, Director of Arbim Techo Ltd
1602170066475452	4733	Sajiya Jasmin	Mercantile Bank Securities Limited	A.B.M Ziya
				Rasheda Khanam
				Wife of Mohammad Shamsul Alam
1203510068907832	22246	Sultana Parvin	Stock & Bond Limited	Md. Abdur Rob
				Ambia Khatun
				Sister of Mohammad Shamsul Alam

a) Individual Trade Patterns, Trade monitoring screenshots, Effects of "FINEFOODS" at DSE in public market by Mohammad Shamsul Alam and associates and gain and loss statement are given below:



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a) Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by Mohammad Shamsul Alam and Associates

Date	Buy			Sell			Cost of shares sold			Stock Position			Compar			With the M			Client		
	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Mkt True and	Y	Mkt Close Price at DSE	Market Change	Client Buy	Client Sell	Client Buy	Client Sell	Client Buy	Client Sell
Opening Balance																					
02-03-2023	36591	60.87	2227407.70	36170	60.16	2176600.00	61.70	2231542.80	1374330	61.70	84783697.02		9	62.20	2.1	8.2	6.24%				
05-03-2023	277016	62.92	17429131.10	209596	62.93	13130662.00	61.90	13974177.26	1441571	61.90	89234516.35		8	65.30	4.9	32.1	4.25%				
06-03-2023	64278	64.42	4140706.90	12985	64.96	841250.00	62.01	805178.52	1492864	62.01	92570044.73		3	64.70	-0.5	10.3	8.81%				
07-03-2023	114242	65.97	7536949.70	148555	64.56	9533220.00	62.29	9253224.38	1458551	62.29	90853470.05		9	67.00	3.5	13.6	10.1%				
08-03-2023	82912	65.47	5428228.40	63394	66.18	412750.00	62.46	8059168.18	1474069	62.46	92422030.27		5	69.80	2.1	11.3	11.7%				
09-03-2023	124384	65.93	8214356.40	133000	63.21	844740.00	62.73	8343252.95	1469554	62.73	92193133.68		4	66.70	2.1	12.3	11.3%				
10-03-2023	145504	67.52	10094296.70	190594	67.75	1292630.20	63.50	7302496.45	1428558	63.50	90246069.70		12	68.80	3.8	12.3	11.3%				
11-03-2023	70034	70.27	4921166.70	115936	69.63	807950.00	63.50	7302496.45	1387656	63.50	87405339.93		8	67.70	-1.1	12.3	11.3%				
12-03-2023	10000	66.40	664000.00	135644	66.00	897430.40	63.53	8618669.60	1257012	63.53	79852470.35		5	65.40	-3.3	12.3	11.3%				
13-03-2023	2	65.80	131.60	0	0.00	0.00	0.00	0.00	1257014	63.53	79852470.35		2	66.10	1.1	12.3	11.3%				
14-03-2023	54063	68.11	3695444.00	52000	68.18	353500.00	63.73	3313847.73	1263077	63.73	80493170.22		6	68.00	2.1	12.3	11.3%				
15-03-2023	0	0.00	0.00	57051	73.53	41705.70	63.73	3313847.73	1206026	63.73	7687433.16		9	72.10	1.1	12.3	11.3%				
16-03-2023	0	0.00	0.00	360511	73.19	2637324.10	63.73	3313847.73	845513	63.73	53882845.48		7	70.70	-1.1	12.3	11.3%				
17-03-2023	25000	71.20	1779912.50	368032	70.89	2609396.10	63.94	23532023.75	502483	63.94	32120934.02		8	73.50	3.1	12.3	11.3%				
18-03-2023	83339	70.00	5834080.60	347468	71.36	2419630.80	64.80	22317156.93	238354	64.80	16440457.70		3	72.30	-1.1	12.3	11.3%				
19-03-2023	25000	72.26	1806200.00	0	0.00	0.00	0.00	0.00	258354	65.38	16891657.70		2	72.30	0.0	12.3	11.3%				
20-03-2023	0	0.00	0.00	8854	71.30	63290.20	65.38	578490.74	249500	65.38	16312766.96		1	72.30	0.0	12.3	11.3%				
21-03-2023	0	0.00	0.00	16839	75.61	12749.00	65.38	1100164.86	232661	65.38	15211802.30		2	74.10	1.1	12.3	11.3%				
22-03-2023	140500	74.75	10503466.00	41000	74.40	30350.00	68.91	2825391.72	347161	68.91	2389876.58		5	74.00	0.0	12.3	11.3%				
23-03-2023	0	0.00	0.00	43043	72.19	31234.40	68.91	2965178.92	289118	68.91	19923697.60		6	71.40	-3.3	12.3	11.3%				
24-03-2023	0	0.00	0.00	30118	71.77	211663.80	68.91	2075491.41	259000	68.91	17844206.24		4	71.30	0.0	12.3	11.3%				
25-03-2023	43149	67.94	2931658.10	0	0.00	0.00	0.00	0.00	302149	68.77	20779864.34		2	68.20	-1.1	12.3	11.3%				
26-03-2023	151850	70.31	10676795.00	48314	70.07	3394.00	69.29	4733336.92	385685	69.29	26723922.43		5	72.80	0.0	12.3	11.3%				
27-03-2023	80929	72.40	5859082.80	0	0.00	0.00	0.00	0.00	466424	69.83	32582406.23		17	73.20	0.0	12.3	11.3%				
28-03-2023	0	0.00	0.00	18194	72.81	131680.70	69.83	1270436.30	448420	69.83	31311967.92		16	72.20	-1.1	12.3	11.3%				
29-03-2023	0	0.00	0.00	36929	73.17	269419.20	69.83	6070019.31	361491	69.83	25241948.61		16	72.20	-1.1	12.3	11.3%				
30-03-2023	121034	76.40	9246584.20	60000	75.14	453589.80	71.48	4288507.27	423525	71.48	30200255.55		6	74.70	2.1	12.3	11.3%				
31-03-2023	0	0.00	0.00	121034	77.47	935452.10	71.48	8650919.81	301481	71.48	21549105.74		11	73.70	2.1	12.3	11.3%				
01-04-2023	267229	74.34	19865635.80	102500	75.83	772500.00	72.82	7464149.33	466220	72.82	33950592.21		11	73.70	2.1	12.3	11.3%				
02-04-2023	62004	77.14	4782996.30	25000	77.58	193607.50	73.33	1833199.01	503224	73.33	36900389.50		11	77.10	1.1	12.3	11.3%				
03-04-2023	63625	76.34	4856991.70	0	0.00	0.00	0.00	0.00	506849	73.67	41757381.20		11	81.20	5.1	12.3	11.3%				
04-04-2023	113114	81.29	9195424.60	93499	81.41	761667.90	74.93	7000317.09	586464	74.93	43946488.71		11	82.80	1.1	12.3	11.3%				
05-04-2023	0	0.00	0.00	999	80.70	8070.00	74.93	74859.74	585465	74.93	43871628.97		11	80.70	-2.1	12.3	11.3%				
06-04-2023	90628	82.60	7485537.20	421246	81.15	344549.00	75.96	31998557.62	244847	75.96	18386080.54		17	79.40	-1.1	12.3	11.3%				
07-04-2023	11568	77.00	890736.00	0	0.00	0.00	0.00	0.00	264415	76.01	20249444.34		17	83.00	2.1	12.3	11.3%				
08-04-2023	0	0.00	0.00	11568	82.00	94576.00	76.01	879246.36	254847	76.01	19370098.19		17	83.00	2.1	12.3	11.3%				
09-04-2023	30000	86.32	2589538.50	49000	80.00	39000.00	77.09	3777544.43	235847	77.09	18182092.26		17	86.20	3.1	12.3	11.3%				
10-04-2023	15000	86.80	1302600.00	0	0.00	0.00	0.00	0.00	250847	77.67	19484092.26		17	86.20	3.1	12.3	11.3%				
11-04-2023	200000	80.00	16000000.00	32000	87.15	278775.00	78.71	2518572.71	250847	78.71	32965819.55		17	89.80	4.1	12.3	11.3%				
12-04-2023	31000	84.50	2619500.00	0	0.00	0.00	0.00	0.00	449847	79.12	35629419.55		17	89.80	4.1	12.3	11.3%				
13-04-2023	500	88.80	44400.00	0	0.00	0.00	0.00	0.00	450347	79.12	35629419.55		17	89.80	4.1	12.3	11.3%				
14-04-2023	0	0.00	0.00	1000	92.60	9260.00	79.12	79115.48	449847	79.12	35629419.55		17	89.80	4.1	12.3	11.3%				
15-04-2023	0	0.00	0.00	142848	101.80	14496.40	79.12	11303488.24	306499	79.12	24246811.63		17	89.80	4.1	12.3	11.3%				
16-04-2023	25000	93.00	2325000.00	57152	97.69	553059.00	80.16	4261451.90	274347	80.16	21992468.93		17	108.30	6.1	12.3	11.3%				

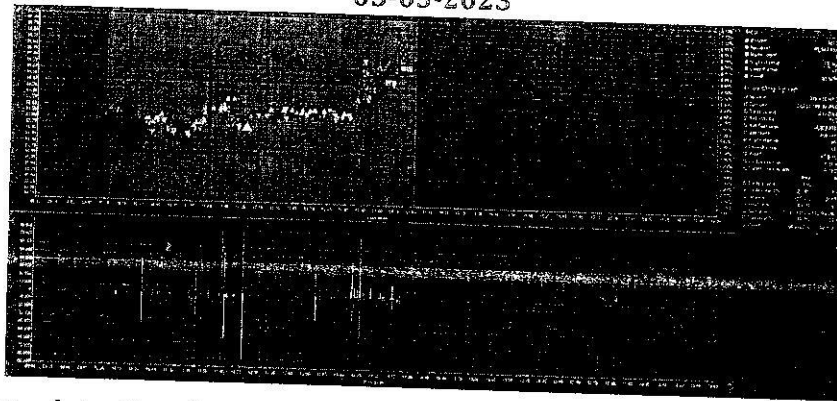
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market):

The Investigation Team of IED collected Trade monitoring screenshots from the Surveillance Department of DSE on some trading days, where appearance of unusual trading of Mohammad Shamsul Alam and associates were observed which influenced to uplift the price of shares of 'FINEFOODS' during the investigation period.

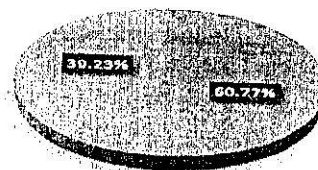
BOLD: 1203510068173076, 1201820068895861, 1205720075603052,
1203510066591329, 1602170066475452, 1203510068907832 (combined)

05-03-2023



It was observed in the above graph that on 05-03-2023, total number of trades of FINEFOODS in the market was 682, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 146 which is approximately 21.41% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 721,578 whereas buy volume by the said client(s) was 137,016 which is approximately 18.99% of the total traded volume in the market.

On 05-03-2023, trading of FINEFOODS share was started at Tk. 63.30 which is Tk. 1.10 more than the YCP of Tk. 62.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 13:38:19 at price Tk. 63.50 and induced the same to rise to Tk. 64.80 up to 13:45:45. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates bought 73,352 shares of FINEFOODS compared to the total traded share of 120,709. This is shown in the following Pie Chart.



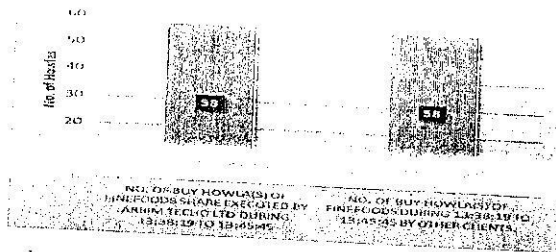
■ Total trade of FINEFOODS share by ARBIM TECHNO LTD during 13:38:19 to 13:45:45

■ Total trade of FINEFOODS during 13:00:19 to 13:45:45 by other clients

A

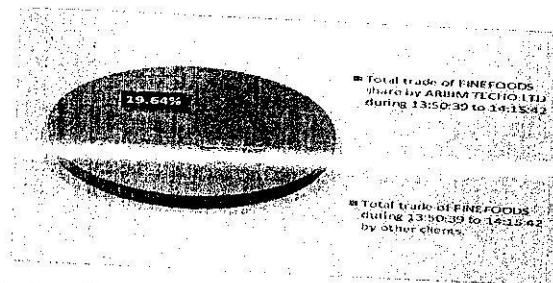
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associates executed 58 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.

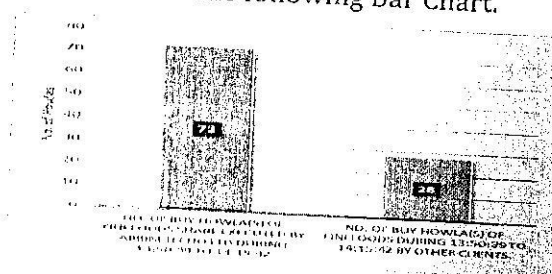


It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 60.77% of the total trades of FINEFOODS shares by executing 58 of total 116 howlas from 13:38:19 to 13:45:45 on 05-03-2023. From 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 63.50 to Tk. 64.80 (induced the price by Tk. 1.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share.

Besides, on that day, Mohammad Shamsul Alam and associates started series of trading at 13:50:39 at price Tk. 64.10 and induced the same to rise to Tk. 66.40 up to 14:15:42. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:50:39 to 14:15:42, Mohammad Shamsul Alam and associates bought 51,139 shares of FINEFOODS compared to the total traded share of 63,638. This is shown in the following Pie Chart.



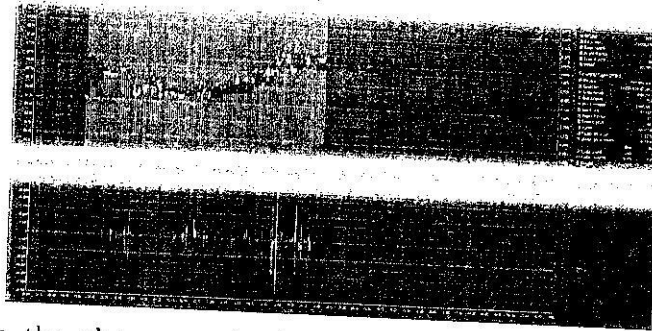
It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 73 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 101 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 80.36% of the total trades of FINEFOODS shares by executing 73 of total 101 howlas from 13:50:39 to 14:15:42 on 05-03-2023. From 13:50:39 to 14:15:42, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 64.10 to Tk. 66.40 (induced the price by Tk. 2.30). Thus it seems that Mohammad Shamsul Alam and

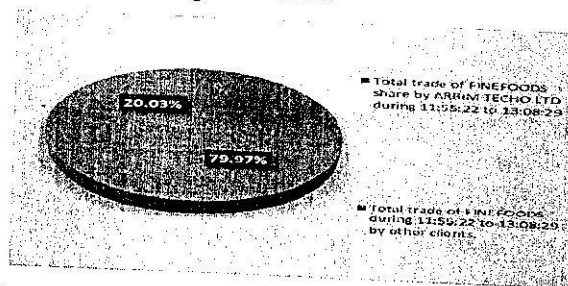
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price of FINEFOODS share was increased by Tk. 3.10 which is approximately 4.98% higher than YCP.

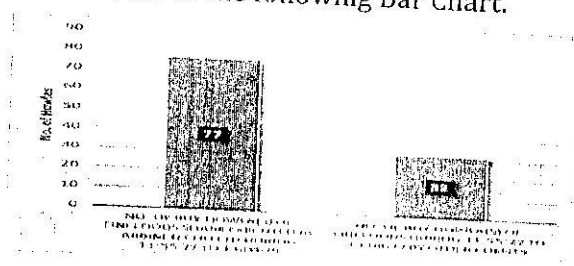


It was observed in the above graph that on 12-03-2023, total number of trades of FINEFOODS in the market was 698, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 202 which is approximately 28.94% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 361,964 whereas buy volume by the said client(s) was 124,584 which is approximately 34.42% of the total traded volume in the market. It is evident that the client had significant participation in the market on 12-03-2023 in trading of FINEFOODS share.

On 12-03-2023, trading of FINEFOODS share was started at Tk. 66.80 which is Tk. 1.50 more than the YCP of Tk. 65.30. On that day, Mohammad Shamsul Alam and associates started series of trading at 11:55:22 at price Tk. 64.60 and induced the same to rise to Tk. 65.90 up to 13:08:29. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 11:55:22 to 13:08:29, Mohammad Shamsul Alam and associates bought 50,377 shares of FINEFOODS compared to the total traded share of 62,825. This is shown in the following Pie Chart.

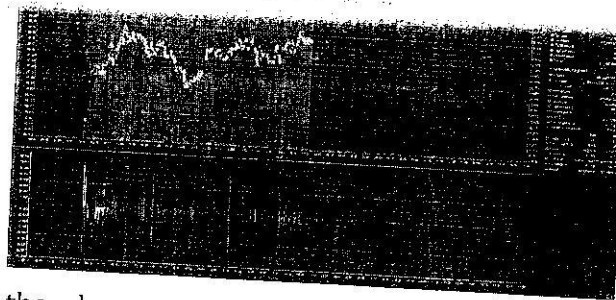


It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 77 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 109 as shown in the following Bar Chart.



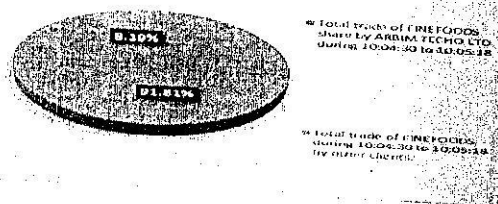
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associates bought 79.97% of the total trades of FINEFOODS shares by executing 77 of total 109 howlas from 11:55:22 to 13:08:29 on 12-03-2023. From 11:55:22 to 13:08:29, Mohammad Shamsul Alam and associates induced the price by Tk. 1.30. Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 1.40 which is approximately 2.14% higher than YCP.

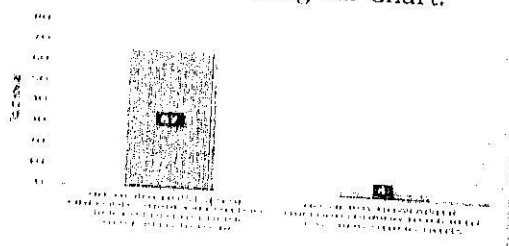


It was observed in the above graph that on 13-03-2023, total number of trades of FINEFOODS in the market was 1841, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 118 which is approximately 6.41% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 1,208,313 whereas buy volume by the said client(s) was 149,504 which is approximately 12.37% of the total traded volume in the market.

On 13-03-2023, trading of FINEFOODS share was started at Tk. 65.60 which is less than the YCP of Tk. 66.70. On that day, Mohammad Shamsul Alam and associates started series of trading at 10:04:30 at price Tk. 67.30 and induced the same to rise to Tk. 67.70 up to 10:05:18. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentioned that from 10:04:30 to 10:05:18, Mohammad Shamsul Alam and associates bought 71,722 shares of FINEFOODS compared to the total traded share of 78,122. This is shown in the following Pie Chart.

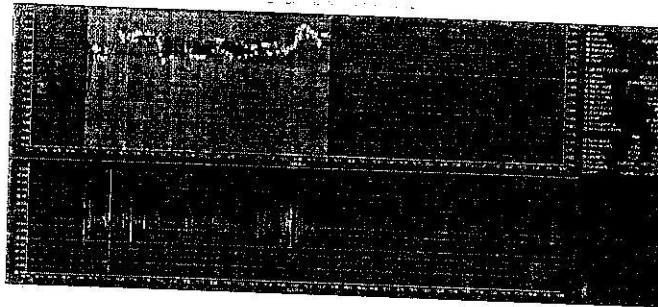


It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 67 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 71 as shown in the following Bar Chart.



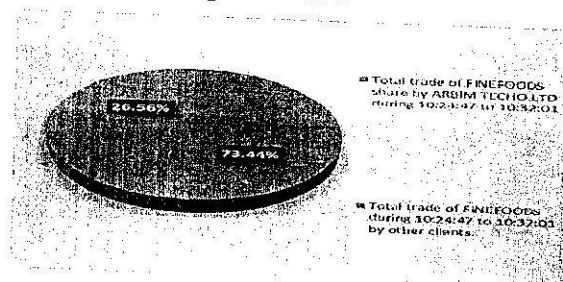
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It is observed from the above graph that on 13-03-2023, associates bought 91.81% of the total trades of FINEFOODS shares by executing 67 of total 71 howlas from 10:04:30 to 10:05:18 on 13-03-2023. From 10:04:30 to 10:05:18, 67.70 (induced the price by Tk. 0.40). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 2.10 which is approximately 3.15% higher than YCP.



It was observed in the above graph that on 08-05-2023, total number of trades of FINEFOODS in the market was 1112, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 74 which is approximately 6.65% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 831,479 whereas buy volume by the said client(s) was 93,114 which is approximately 11.20% of the total traded volume in the market.

On 08-05-2023, trading of FINEFOODS share was started at Tk. 78.00 which is Tk. 3.20 less than the YCP of Tk. 81.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 10:24:47 at price Tk. 81.30 and induced the same to rise to Tk. 82.50 up to 10:32:01. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trading during this time period. It is mentionable here that from 10:24:47 to 10:32:01, Mohammad Shamsul Alam and associates bought 90,414 shares of FINEFOODS compared to the total traded share of 123,115. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 68 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.

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Summary of the trade by Mohammad Shamsul Alam and associates:

d. Gain and Loss by Mohammad Shamsul Alam and associates from 02.03.2023 to 07.06.2023:

As per DSE trade data, it was observed that **Mohammad Shamsul Alam and associates** bought 2562695 shares and sold 3662078 shares of FINEFOODS from public market during the period from 02-03-2023 to 07-06-2023. With the said BO accounts, **Mohammad Shamsul Alam and associates** traded 16.26% shares of FINEFOODS and realized a capital gain/loss of Tk. 21754709.91 from the trading of FINEFOODS share during the investigation period. They had also unrealized gain/loss of TK. 7719416.17 during the period.

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As per section 17 of the Securities and Exchange Ordinance, 1969, "No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or

(e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-

(v) directly or indirectly effect a series of transactions in any security creating an appearance of active trading therein or of raising of price for the purpose of including its purchase by others or depressing its price for the purpose of inducing its sale by others;"

It is evident that Mohammad Shamsul Alam and associates were involved directly and indirectly in a series of transactions of shares of 'FINEFOODS' with their aforesaid BO accounts in order to create an appearance of active trading and raising of price of the said share.

Contravention(s)-1:

Mohammad Shamsul Alam and associate(s) have violated the following:

- > Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 by directly and indirectly effecting a series of transactions of shares of "FINEFOODS" creating an appearance of active trading therein and raising price of the said share.

Observation-2:

After analyzing the trade pattern of the clients, the investigation team found that MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARDIN TECHNO LTD. (BOID: 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), SAJIYA JASMIN (BOID: 1602170066475452) and SULTANA PARVIN (BOID: 1203510068907832) were involved in trading in shares of "FINEFOODS" within the investigation period and these accounts are acting as counter party of each other for 237125 shares of "FINEFOODS" in 58 howlas in both the public and block market during the investigation period. Detail of the above mentioned trade is as follows:

Table: Counterparty trading of Mohammad Shamsul Alam and associates:

TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER CLIENT	BOID SELLER	MARKET TYPE
28-03-23	11:28:32	279959946	FINEFOODS	947	71.5	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959948	FINEFOODS	2000	71.5	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959949	FINEFOODS	2000	71.5	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959950	FINEFOODS	1005	71.5	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
28-03-23	11:28:41	279959975	FINEFOODS	995	71.5	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
16-05-23	12:52:31	283924418	FINEFOODS	158	81	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
16-05-23	12:52:34	283924444	FINEFOODS	500	81	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
16-05-23	12:52:36	283924474	FINEFOODS	1000	81	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963310	FINEFOODS	2000	71	DSFEPS	HO 444	1201820068895861	DSSEBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963320	FINEFOODS	1769	71	DSFEPS	HO 444	1201820068895861	DSSENL	04008	1205720075603052	Public
28-03-23	11:41:46	279963321	FINEFOODS	231	71	DSFEPS	HO 444	1201820068895861	DSSENL	04008	1205720075603052	Public

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28-03-23	11:41:46	279963334	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:41:46	279963340	FINEFOODS	919	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:42:04	279963402	FINEFOODS	1051	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
28-03-23	11:42:04	279963402	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSENL	04008	1205720075603052	Public
16-05-23	12:36:59	283915857	FINEFOODS	1789	81.3	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
16-05-23	12:59:29	283928406	FINEFOODS	1900	81.5	DSEEPS	HO344	1201820068895861	DSEMBL	4733	1602170066475452	Public
12-04-23	10:50:05	281119325	FINEFOODS	1000	69.7	DSESB	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119382	FINEFOODS	1000	69.7	DSESB	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:11	281119383	FINEFOODS	1000	69.7	DSESB	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:16	281119435	FINEFOODS	900	69.8	DSESB	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
12-04-23	10:50:16	281119437	FINEFOODS	100	69.8	DSESB	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
07-03-23	10:55:21	278779320	FINEFOODS	1000	64.9	DSESB	22232	1203510068173076	DSEEPS	HO344	1201820068895861	Public
09-03-23	14:18:40	278985394	FINEFOODS	2750	66	DSESB	22232	1203510068173076	DSESB	22246	1203510068907832	Public
09-03-23	14:18:40	278985395	FINEFOODS	3000	66	DSESB	22232	1203510068173076	DSESB	22246	1203510068907832	Public
09-03-23	14:18:40	278985396	FINEFOODS	3000	66	DSESB	22232	1203510068173076	DSESB	22246	1203510068907832	Public
09-03-23	14:18:40	278985397	FINEFOODS	1250	66	DSESB	22232	1203510068173076	DSESB	22246	1203510068907832	Public
09-03-23	14:10:07	278976832	FINEFOODS	30000	65	DSESB	22232	1203510068173076	DSESB	22246	1203510068907832	Public
29-03-23	12:00:47	280044729	FINEFOODS	83168	70	DSESB	22232	1203510068173076	DSENL	04008	1205720075603052	Public
07-06-23	10:07:08	287291682	FINEFOODS	25000	93	DSESB	22232	1203510068173076	DSENL	04008	1205720075603052	Block
02-03-23	12:29:00	278428191	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSEMBL	4733	1602170066475452	Block
02-03-23	12:29:00	278428192	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428193	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428194	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428195	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428196	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428197	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428198	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428199	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
02-03-23	12:29:00	278428200	FINEFOODS	1000	59.6	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
07-03-23	12:04:01	278807613	FINEFOODS	1000	65.8	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
07-03-23	12:04:44	278807862	FINEFOODS	1000	65.8	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
07-03-23	12:08:10	278808932	FINEFOODS	800	65.8	DSESB	22246	1203510068907832	DSESB	22232	1203510068173076	Public
07-03-23	10:41:47	278771482	FINEFOODS	5000	64.2	DSENL	04008	1205720075603052	DSESB	22232	1203510068173076	Public
07-03-23	14:18:55	278870326	FINEFOODS	1796	67.3	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
12-03-23	13:41:37	279065317	FINEFOODS	1750	67	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
12-03-23	13:41:41	279065325	FINEFOODS	5000	67	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
12-03-23	13:41:45	279065360	FINEFOODS	5000	67	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
12-03-23	13:41:49	279065371	FINEFOODS	5000	67	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
13-03-23	13:32:25	279161748	FINEFOODS	10350	68.2	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
09-03-23	14:16:32	278982617	FINEFOODS	3000	66	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
09-03-23	14:19:03	278985899	FINEFOODS	1660	66	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
09-03-23	14:19:03	278985900	FINEFOODS	3000	66	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public
09-03-23	14:19:03	278985901	FINEFOODS	226	66	DSENL	04008	1205720075603052	DSENL	04008	1205720075603052	Public

TOTAL HOWLA NO: 58

TOTAL TRADE VOLUME: 237125

(DSE trade data)

Findings-2:

As per section 17 of the Securities and Exchange Ordinance, 1969 (XVII of 1969), "No person shall, for the purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantage, the sale or purchase of any security, directly or indirectly, -

- (e) do any act or practice or engage in a course of business, or omit to do any act which operates or would operate as a fraud, deceit or manipulation upon any person, in particular-
- (ii) create a false and misleading appearance of active trading in any securities;

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party of each other for 237125 shares of "FINEFOODS" in 58 howlas in both the public and block market during the investigation period.

Contravention(s)-2:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), SAJIYA have violated the following:

- Section 17(e)(ii) of Securities and Exchange Ordinance, 1969 by executing trades that created a false and misleading appearance of active trading in securities.

Observation-3:

As per the DSE trade data, it was observed that Mohammad Shamsul Alam and associates had collectively acquired more than 10% shares of "FINEFOODS" during the investigation period. Details are given below:

Shareholding position of Mohammad Shamsul Alam and associates:

Sl. No	Client Name	BOID	Name of TREC Holder	Opening Balance	05-03-2023		06-03-2023		07-03-2023		09-03-2023		12-03-2023		13-03-2023	
					Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	ARBIM TECO LTD	201820068895861	BRACEPL Stock Brokerage Limited	160000	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	149329	1.07%
2	AAA AGRO ENTERPRISE	205720075603052	NLI Securities Limited	829154	848898	6.07%	896565	6.42%	896615	6.42%	897262	6.42%	920894	6.59%	920894	6.59%
3	MOHAMMAD SHAMSUL ALAM	1203510068173076	Stock & Bond Limited	8300	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%
4	MOHAMMED JAHANGIR ALAM	20351006891329	Stock & Bond Limited	115295	115677	0.83%	115677	0.83%	104038	0.74%	87592	0.63%	88583	0.63%	88583	0.63%
5	SULTANA PARVIN	203510068907832	Stock & Bond Limited	115295	115677	0.83%	115677	0.83%	104038	0.74%	87592	0.63%	88583	0.63%	88583	0.63%
Total holding of FINEFOODS by the aforesaid clients during the investigation period					1441160	10.31%	1492443	10.88%	1458130	10.43%	1477648	10.57%	1469232	10.51%	1428137	10.22%
Total No. of Outstanding Securities of FINEFOODS					13,973,918											

From the above table, it is observed that Mohammad Shamsul Alam and associates (DSE Trade data) jointly hold more than 10% of the total paid up shares of FINEFOODS.

Findings-3:

As per উপ-বিধি (১) (ক) of বিধি ২ of the বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কতৃৎ গ্রহণ) বিধিমালা, ২০১৮.

"..... (১) বিষয় বা প্রসঙ্গের পরিপ্রেক্ষিতে কোন কিছু না থাকিলে, এই বিধিমালায়, (ক) "অধিগ্রহণকারী" অর্থ এমন কোন ব্যক্তি যে নিজে বা অন্য কাহারো দ্বারা বা অন্যভাবে একত্রে (persons acting in concert) কোন কোম্পানির ভোটাধিকারযুক্ত শেয়ার অথবা ভোটাধিকারযুক্ত শেয়ারে অপ্রত্যক্ষভাবে সিকিউরিটিজ অধিগ্রহণ করে বা উহার জন প্রস্তাব করে....."



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३३३) विविधाना, २०१६

পাংখ্যক এর কক্ষ কোন শেয়ারের ধারক বা ধারকগণ, বা যিনি বা যাহারা কোন শেয়ার ধারণ করেন না এমন ব্যক্তি বা ব্যক্তিগণ, এক্ষেত্রে হইতে উক্ত কোম্পানির কোন শেয়ার অর্জন বা অধিগ্রহণ করিতে চাহিলে অর্জন বা অধিগ্রহণ পরবর্তী ধারণকৃত মোট শেয়ারের পরিমাণ যদি ১০(দশ) শতাংশ বা উহার অধিক পর্যায়ে উন্নীত হয় অথবা ১০(দশ) শতাংশ বা উহার অধিক কোন শেয়ার ধারক বা ধারকগণ এক্ষেত্রে হ্যাণ্ডেল উক্ত কোম্পানির মোট শেয়ারের দ্বারা বা অধিগ্রহণকারার স্যক প্রকার বা

However, it is found that Mohammad Shamsul Alam and associates jointly hold more than 10% shares of 'FINEFOODS' on the aforesaid dates.

Contravention(s)-3:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECNO LTD.
(BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID:
1205720075603052), MOHAMMED JAHANGIR ALAM (BOID: 1203510066591329)
and SULTANA PARVIN (BOID: 1203510068907832) have violated the following:

১) বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by acquiring more than 10% shares of "FINEFOODS" without complying the requirements of the said rules.



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A. Trade details of A A A AGRO ENTERPRISE:

Date	Code # 04008									
	BO ID # 1205720075603052									
	A A A AGRO ENTERPRISE									
	NLI Securities Limited									
	Rate		Rate		Buy Rate		Total		Total	
	Qty	Price	Qty	Price	Qty	Price	Qty	Price	Qty	Price
02-03-2023	8200	61.90	8200	62.00	8200	61.90	507580.00	8200	62.00	508400.00
05-03-2023	129744	64.63	110000	62.91	129744	64.63	8384935.80	110000	62.91	6920000.00
06-03-2023	47667	64.20	0	0.00	47667	64.20	3060221.40	0	0.00	0.00
07-03-2023	50050	65.84	0	0.00	50050	65.84	3295215.00	0	0.00	0.00
09-03-2023	30647	65.82	30000	65.00	30647	65.82	2017081.10	30000	65.00	1950000.00
12-03-2023	103632	65.98	0	0.00	103632	65.98	6837305.70	0	0.00	0.00
13-03-2023	12500	68.23	0	0.00	12500	68.23	852930.00	0	0.00	0.00
14-03-2023	70034	70.27	70000	69.70	70034	70.27	4921166.70	70000	69.70	4879000.00
19-03-2023	500	66.20	500	67.30	500	66.20	33100.00	500	67.30	33650.00
27-03-2023	0	0.00	141200	72.03	0	0.00	0.00	141200	72.03	10170840.00
28-03-2023	0	0.00	283361	70.91	0	0.00	0.00	283361	70.91	20092448.70
29-03-2023	0	0.00	181199	71.71	0	0.00	0.00	181199	71.71	12994669.10
13-04-2023	79929	72.40	0	0.00	79929	72.40	5786883.80	0	0.00	0.00
17-04-2023	0	0.00	79929	73.20	0	0.00	0.00	79929	73.20	5850802.80
25-04-2023	121034	76.40	0	0.00	121034	76.40	9246584.20	0	0.00	0.00
Total	653937		904389		653937		9246584.20	904389		

b) Effects of "FINEFOODS" at DSE in both public and block market by A A A AGRO ENTERPRISE:

at DSE in both public and block market by A A A AGRO ENTERPRISE:																			
Date	Buy			Sale			Bonus Share Credit ed	Cost of shares sold		Stock Position			Comparison with the Market						
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)	
Upward variance																			
02-03-2023	8200	61.90	507580.00	8200	62.00	508400.00	0	61.69	505825.42	829134	61.66	51145461.04							
05-03-2023	129744	64.63	8384935.80	110000	62.91	6920000.00	0	62.08	6829231.74	849899	62.08	52702919.69	444489	62.20	2.13%	1.84%	1.84%	3.69%	
06-03-2023	47667	64.20	3060221.40	0	0.00	0.00	0	0.00	0.00	856565	62.20	53763141.08	861578	65.30	4.98%	15.06%	12.77%	27.83%	
07-03-2023	50050	65.84	3295215.00	50000	62.00	3100000.00	0	62.39	3119449.62	896615	62.39	55938954.46	392903	64.70	-0.92%	12.13%	0.00%	12.13%	
09-03-2023	30647	65.82	2017081.10	30000	65.00	1950000.00	0	62.50	1875068.35	897262	62.50	5600919.21	560524	67.00	3.55%	5.56%	5.55%	11.11%	
12-03-2023	103632	65.98	6837305.70	80000	60.75	4860000.00	0	62.85	5028962.10	920894	62.85	57889262.81	558135	65.30	-2.54%	5.45%	5.37%	10.87%	
13-03-2023	12500	68.23	852930.00	12500	65.00	812500.00	0	62.93	785674.66	920894	62.93	57955518.15	442964	66.70	2.14%	23.45%	18.10%	41.55%	
14-03-2023	70034	70.27	4921166.70	70000	69.70	4879000.00	0	63.45	4441662.70	920923	63.45	58435022.15	1248813	58.80	3.15%	1.00%	1.00%	2.00%	
19-03-2023	500	66.20	33100.00	500	67.30	33650.00	0	63.45	31726.91	920928	63.45	58436395.24	936001	57.70	-1.60%	8.38%	8.37%	16.75%	
27-03-2023	0	0.00	0.00	341200	73.19	24970840.00	0	63.45	21650441.79	979728	63.45	36785953.45	678488	68.00	2.97%	0.07%	0.07%	0.15%	
28-03-2023	0	0.00	0.00	283361	70.91	20092448.70	5	63.45	17980336.56	296367	63.45	28805616.83	791884	72.10	-1.10%	0.00%	43.09%	43.09%	
29-03-2023	0	0.00	0.00	256367	71.16	18288429.10	0	63.45	18805616.83	0	0.00	0.00	857872	70.70	-1.94%	0.00%	33.03%	33.03%	
13-04-2023	79929	72.40	5786883.80	0	0.00	0.00	0	0.00	0.00	79929	72.40	5786883.80	860314	73.50	3.96%	0.00%	33.67%	33.67%	
17-04-2023	0	0.00	0.00	79929	73.20	5850802.80	0	72.40	5786883.80	0	0.00	0.00	390317	73.20	0.55%	20.48%	0.00%	20.48%	
25-04-2023	121034	76.40	9246584.20	0	0.00	0.00	0	0.00	0.00	121034	76.40	9246584.20	301196	72.20	-1.37%	0.00%	26.52%	26.52%	
27-04-2023	0	0.00	0.00	121034	77.47	9376452.10	0	76.40	9246584.20	0	0.00	0.00	621831	73.70	2.22%	0.00%	19.46%	19.46%	
Total	653937	68.73	44943003.70	1483091	70.42	104442522.70	0	64.79	96088464.74	0	0.00	0.00							

Summary of the trade by A A A AGRO ENTERPRISE:

Block Buy			Block Sale			Total Buy		Summary						
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Total Sale	Cost of Shares Sold	Stock Position			
0	0.00	0.00	6E+05	70.92	41047717.10	6E+05	70.92	41047717.10	1,181,091.00	64.79	104442522.70	0	0.00	0.00

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Realized gain(loss) per unit	5.63	Average Sale Price - Average Cost Price
Realized gain(loss) %	8.69%	Gain (loss) Per Unit/Cost Per Unit
Closing Price (07-06-2023)	108.30	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	0.00	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	0.00%	Unrealized gain (loss) per unit / Average Price of Stock Position

যেহেতু উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক সেপ্টেম্বর ১১, ২০২৪ তারিখ বিএসইসি/এনফোর্সমেন্ট/২৭০১/২০২৪/৭১১ স্মারকসূলে Mohammad Shamsul Alam & associate(s) [associates are Mr. Mohammad Shamsul Alam, Arbim Techo Ltd, AAA Agro Enterprise, Mr. Mohammed Jahangir Alam, Ms. Sajiya Jasmin, Ms. Sultana Parvin]-কে সেপ্টেম্বর ৩০, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখ মার্চ সেপ্টেম্বর ৩০, ২০২৪ এ MR. Mohammad Shamsul Alam শুনানীতে উপস্থিত ৩০.০৯.২০২৪ইং তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"আপনার প্রেরিত পত্র নাম্বার বিএনইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/৭১১ তারিখ: ১১.০৯.২০২৪ সিকিউরিটিজ এন্ড এক্সচেঞ্জ অর্ডিন্যান্স ১৯৬৯-এর ধারা 17(e)(ii), 17(e)(v) আইন এবং বিধি ০৪ (১) বাংলাদেশ সিকিউরিটিজ এন্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ লংঘনের অভিযোগে ফাইন ফুডস লিমিটেড-এর শেয়ার লেনদেনের জন্য আগামী ৩০ সেপ্টেম্বর, ২০২৪ইং তারিখে আপনার কমিশনে উপস্থিত হয়ে আমাকে শুনানীর জন্য ডাকা হলে আপনাদের চিঠির মর্মমতে আমার বক্তব্য নিম্নরূপ:

আপনাদের প্রেরিত চিঠিতে রিয়েলাইজড এবং আন রিয়েলাইজড গেইন এর কথা উল্লেখ করেছেন, এ বিষয়ে আমার বক্তব্য হল আমি দীর্ঘদিন যাবৎ শেয়ার বাজারে লেনদেন করে আসছি। শেয়ার ব্যবসায়ী হিসেবে ফাইন ফুডস লি.-এর শেয়ার ক্রয়-বিক্রয়ের জন্য আমি নিজে নিজে করে বা অন্য কারো মাধ্যমে বাজারে গিয়ে কিনে বা বিক্রি করে থাকি। এখানে উল্লেখ্য যে পুঁজিবাজারে আমাদের বিনিয়োগের কোনো অসৎ উদ্দেশ্য ছিল না এবং আমি/আমরা কোনো ধরনের সিরিজ ট্রানজেকশনের সঙ্গে জড়িত নই। এখানে উল্লেখ্য পরিবারের অন্যান্য সদস্যগণ সম্পূর্ণ আলাদাভাবে বি.ও হিসাব পরিচালনা করা হয়ে থাকে যাহা আমার বা আমার পরিবারের অন্যান্য সদস্যের বিও হিসাব থেকে বুঝা যায়, দিন শেষে আমরা প্রত্যেকেই আমাদের নিজ নিজ পরিবারের আয়ের মাধ্যমে ব্যয়ের পরিচালনা হয়ে থাকে। পুঁজিবাজারের ক্ষতি হয় এমন কোনো কিছুর সঙ্গে আমার কোনো প্রকার কোনো সংশ্লিষ্টতা নেই। আমার সিকিউরিটিজ আইন সম্বন্ধে ভালভাবে ধারণা না থাকার কারণে নিজের এবং পরিবারের সবার ধারণকৃত শেয়ার ১০% এর উপরে হয়ে যাওয়ার কারণে বিএসইসি-এর আইনের ব্যত্যয় ঘটেছে যাহা আমার সিকিউরিটিজ আইন সম্পর্কিত অজ্ঞতার কারণে হয়েছে। বর্ণিত শেয়ারের লেন-দেন এর ক্ষেত্রে এই কোম্পানীর সম্পর্কে আমার কোন ভালো ধারণাও ছিল না, বিষয়টি শুধু আমার অজ্ঞতার কারণে হয়েছে। আরও উল্লেখ্য যে, বর্তমানে আমার আর্থিক অবস্থা খুব শোচনীয় এবং বিভিন্ন ধরনের শারিরীক জটিলতায় ভুগছি। ভবিষ্যতে আমি সিকিউরিটিজ আইন মেনে চলার ব্যাপারে আমি সর্বদা সচেতন থাকব এবং এ ধরনের ভুলের পুনরাবৃত্তি যেন না ঘটে তার ব্যাপারে আমি প্রতিশ্রুতিবদ্ধ রইলাম।

অতএব, জনাবের নিকট আমার আবেদন, বর্ণিত বিষয়টি মানবিক তরফে বিবেচনা করে আমার বিরুদ্ধে আনীত সিকিউরিটিজ এন্ড এক্সচেঞ্জ কমিশন অর্ডিন্যান্স ১৯৬৯-এর ধারা 17(e) (ii), 17(e) (v) আইন এবং বিধি ০৪(১) বাংলাদেশ সিকিউরিটিজ এন্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ লংঘনের অভিযোগ হতে আমাকে অব্যাহতি প্রদান করতে বিনিমিতভাবে অনুরোধ করা হল।

Enforcement Division
Enforcement Department
Capital Intermediaries and Other Affairs Section
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সেহেতু উপর্যুক্ত কর্মকাণ্ডের মাধ্যমে পুঁজিবাজারের স্বাধারণ বিনিয়োগকারীগণ সন্তোষিত হয়েছেন যা
১১.১১.১১, সেহেতু এফেঙ্গে AAA Agro Enterprise-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে

AAA Agro Enterprise উপর্যুক্ত কর্মকাণ্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর
Section 17(e)(ii) ও Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ এন্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার

সেহেতু, AAA Agro Enterprise-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর
Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

সেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের সুংখলা, স্বচ্ছতা
এবং জনস্বার্থে আলোচ্য AAA Agro Enterprise-কে অর্থদন্ডে দণ্ডিত করা প্রয়োজন ও সমীচীন;

অতএব, সেহেতু, কমিশন উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969
(Ordinance No. XVII of 1969) এর Section 22 [যা The Securities and Exchange (Amendment)
Act, 2000 দ্বারা সংশোধিত] এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এ প্রদত্ত
ক্ষমতাবলে-

- AAA Agro Enterprise-কে মোট ৭৫.০০ (পঁচাত্তর) লক্ষ টাকা অর্থদন্ডে দণ্ডিত করল যা অত্র আদেশের ৩০ (ত্রিশ)
দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে
জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


02/02/2024
মোঃ আলী আকবর
কমিশনার

বিতরণ:

- ১। A A A Agro Enterprise
(BOID: 1205720075603052)
Koytra Horubari (Ambia Kotej)
North Gajipur, Laksham, Comilla-3570.