



BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

নং-বিএসইসি/এনফোর্সমেন্ট/২৬২১/২০১৮/১৮৫

তারিখঃ ০২ এপ্রিল, ২০১৯ ইং

আদেশ

যেহেতু, as per section 2 (cc) of the Securities and Exchange Ordinance, 1969 Commission means Bangladesh Securities and Exchange Commission constituted under the Bangladesh Securities and Exchange Act, 1993;

যেহেতু, As per enquiry order no. BSEC/Surveillance/2018-899/22 dated- June 21, 2018 and BSEC/Surveillance/2018-895/25 dated-July 10, 2018 enquiry team of BSEC conduct the enquiry to identify the reason behind on recent unusual and suspicious transaction in different securities conducted by Commerce Bank Securities and Investment Limited in favor of its Clients and other related parties. From the enquiry report it appears, among others, that:

INVOLVING PERSONS/GROUP OF PERSONS IN MANIPULATIVE TRANSACTIONS:

Series trading: Some of the clients influenced/tried to influence the market by regularly buying shares in small quantity with gradually increasing prices and after accumulating a large number of shares sell those shares in big lots at high level of prices. They created an impression that the price of the shares are increasing regularly and liquidity is very high. In these way most of the times, they achieved huge realized gain. In some cases, they retained some shares with the hope of achieving more gain in future.

Related parties trading: Some of the clients traded shares with himself/herself. They placed buy order at higher prices than their own sale order prices. In other instances, some of the clients placed buy orders at higher prices from their one account and sale order at lower prices from their other account and thus trades were executed. The following persons/group of persons were involved in manipulative transactions (Data taken from the transaction ledgers, instrument ledgers and the Instant Watch Market Surveillance System).

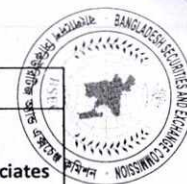
2) Bangladesh Commerce Bank Limited (BCBL) and its associates:

SL	BO ID	Name	Name of the DP	Relationship
1	1203000004128342	Bangladesh Commerce Bank Limited (BCBL)	Commerce Bank Securities And Investment Ltd.	Parent company of CBSIL
2	1203000026365549	Md. Abdul Halim	Commerce Bank Securities And Investment Ltd.	VP, Head of Investment and member of the investment decision, BCBL
3	1201590028159851	Md. Abdul Halim	Royal Capital Ltd.	VP, Head of Investment and member of the investment decision, BCBL
4	1203000039821463	MOHAMMAD SAIFUL ISLAM	Commerce Bank Securities And Investment Ltd.	VP, CFO and member of the investment decision, BCBL

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iv) MONNOSTAF:
c) Individual trade patterns:

Date	1				2				3				Total			
	1203000004128342				1203000026365549				1201590028159851				Bangladesh Commerce Bank & associates			
	Bangladesh Commerce Bank				Md. Abdul Halim				Md. Abdul Halim							
	Commerce Bank Securities And Investment Ltd.				Commerce Bank Securities And Investment Ltd.				Royal Capital Ltd.							
BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	
3-Apr-18	-	-	-	-	40	947.00	-	-	-	-	-	-	40	947.00	-	-
9-Apr-18	8,200	1,241.90	-	-	600	1,225.02	-	-	126	1,208.18	-	-	8,926	1,240.29	-	-
11-Apr-18	-	-	8,200	1,388.60	-	-	640	1,387.64	-	-	126	1,385.00	-	-	8,966	1,388.48
27-May-18	-	-	-	-	100	2,034.26	-	-	-	-	-	-	100	2,034.26	-	-
28-May-18	-	-	-	-	-	-	-	-	100	2,139.40	-	-	100	2,139.40	-	-
29-May-18	-	-	-	-	100	2,222.10	-	-	-	-	-	-	100	2,222.10	-	-
31-May-18	-	-	-	-	-	-	200	2,210.91	-	-	69	2,215.03	-	-	269	2,211.97
4-Jun-18	38	2,436.10	-	-	-	-	-	-	-	-	-	-	38	2,436.10	-	-
5-Jun-18	200	2,554.81	-	-	-	-	-	-	-	-	-	-	200	2,554.81	-	-
7-Jun-18	-	-	-	-	20	2,775.00	-	-	-	-	-	-	20	2,775.00	-	-
10-Jun-18	300	2,848.33	-	-	10	2,830.20	-	-	-	-	-	-	310	2,847.75	-	-
11-Jun-18	200	2,726.55	-	-	-	-	-	-	-	-	-	-	200	2,726.55	-	-
18-Jun-18	-	-	-	-	-	-	2	2,984.70	-	-	-	-	-	-	2	2,984.70
19-Jun-18	-	-	476	3,127.04	-	-	28	3,111.09	-	-	31	3,128.51	-	-	535	3,126.29
20-Jun-18	-	-	262	3,287.80	-	-	-	-	-	-	-	-	-	-	262	3,287.80
Total	8,938	1,363.50	8,938	1,536.85	870	1,473.94	870	1,636.04	226	1,620.23	226	1,877.57	10,034	1,378.85	10,034	1,553.13



d) Combined effects:

Date	Buy			Sale			Cost of shares sold		Stock position			Comparison with the market				
	Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount	Mkt trade Qty (DSE-Normal)	Mkt weighted avg price (DSE-Normal)	Client Buy (%)	Client sale (%)	Client Trade (%)
	1	2	3 (1*2)	4	5	6 (4*5)	7	8 (4*7)	9 (9+1-4)	10	11 (9*10)	12	13	14 (1/12)	15 (4/12)	16 (14+15)
3-Apr-18	40	947.00	37,880	-	-	-	-	-	40	947.00	37,880	19,841	976.78	0.20%	0.00%	0.20%
9-Apr-18	8,926	1,240.29	11,070,819	-	-	-	-	-	8,966	1,238.98	11,108,699	55,168	1,244.24	16.18%	0.00%	16.18%
11-Apr-18	-	-	-	8,966	1,388.48	12,449,120	1,238.98	11,108,699	-	-	-	11,081	1,388.50	0.00%	80.91%	80.91%
27-May-18	100	2,034.26	203,426	-	-	-	-	-	100	2,034.26	203,426	9,756	2,027.04	1.03%	0.00%	1.03%
28-May-18	100	2,139.40	213,940	-	-	-	-	-	200	2,086.83	417,366	12,820	2,139.12	0.78%	0.00%	0.78%
29-May-18	100	2,222.10	222,210	-	-	-	-	-	300	2,131.92	639,576	10,129	2,193.74	0.99%	0.00%	0.99%
31-May-18	-	-	-	269	2,211.97	595,019	2,131.92	573,486	31	2,131.92	66,089	5,179	2,210.99	0.00%	5.19%	5.19%
4-Jun-18	38	2,436.10	92,572	-	-	-	-	-	69	2,299.44	158,661	2,872	2,429.59	1.32%	0.00%	1.32%
5-Jun-18	200	2,554.81	510,961	-	-	-	-	-	269	2,489.30	669,622	9,454	2,546.53	2.12%	0.00%	2.12%
7-Jun-18	20	2,775.00	55,500	-	-	-	-	-	289	2,509.07	725,122	10,884	2,799.99	0.18%	0.00%	0.18%
10-Jun-18	310	2,847.75	882,802	-	-	-	-	-	599	2,684.35	1,607,924	6,232	2,856.42	4.97%	0.00%	4.97%
11-Jun-18	200	2,726.55	545,310	-	-	-	-	-	799	2,694.91	2,153,234	8,092	2,706.94	2.47%	0.00%	2.47%
18-Jun-18	-	-	-	2	2,984.70	5,969	2,694.91	5,390	797	2,694.91	2,147,844	1,272	2,982.91	0.00%	0.16%	0.16%
19-Jun-18	-	-	-	535	3,126.29	1,672,568	2,694.91	1,441,778	262	2,694.91	706,067	6,341	3,124.20	0.00%	8.44%	8.44%
20-Jun-18	-	-	-	262	3,287.80	861,404	2,694.91	706,067	-	-	-	6,035	3,282.86	0.00%	4.34%	4.34%
Total	10,034	1,378.85	13,835,420	10,034	1,553.13	15,584,080	1,378.85	13,835,420	-	-	-					
Realized gain/(loss) per unit			174.27													
Realized gain/(loss) %			12.64%													
Realized gain (loss) Tk.			1,748,660													
Cash dividend			-													
Closing price at DSE- 21-Jun-18			3,452.10													
Unrealized gain (loss) per unit			-													
Unrealized gain/(loss) %			0.00%													
Unrealized gain (loss) Tk.			-													



BANGLADESH SECURITIES AND EXCHANGE COMMISSION
 Securities Commission Bhapan, F-6, Agrapour, Sher-e-Bangla Nagar, Administrative Area, Dhaka-1207, Bangladesh.

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Findings: It is observed that Bangladesh Commerce Bank Limited (BCBL) and Md. Abdul Halim (VP, Head of Investment and member of the investment decision, BCBL) effected manipulative transactions. They effected a series of transactions through the aforesaid 3 (three) BO accounts in the shares of **MONNOSTAF** creating the appearance of active trading therein.

Contraventions: Bangladesh Commerce Bank Limited (BCBL) and Md. Abdul Halim (VP, Head of Investment and member of the investment decision, BCBL) have violated section 17 (e) (v) of Securities and Exchange Ordinance, 1969 by directly or indirectly effecting a series of transactions in the shares of **MONNOSTAF** creating the appearance of active trading therein.

v) MONNOCERA:

c) Individual trade patterns:

Date	1				2				3				4				Total			
	1203000004128342				1203000026365549				1201590028159851				1203000039821463				Bangladesh Commerce Bank & associates			
	Bangladesh Commerce Bank				Md. Abdul Halim				Md. Abdul Halim				MOHAMMAD SAIFUL ISLAM							
	Commerce Bank Securities And Investment Ltd.				Commerce Bank Securities And Investment Ltd.				Royal Capital Ltd.				Commerce Bank Securities And Investment Ltd.							
BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	
21-Aug-17	25,000	56.01	-	-	7,000	51.86	-	-	780	51.70	-	-	-	-	-	-	32,780	55.02	-	-
22-Aug-17	100,000	62.05	-	-	19,850	58.25	-	-	-	-	-	-	8,300	58.90	-	-	128,150	61.26	-	-
23-Aug-17	53,000	64.54	-	-	12,845	65.13	7,000	62.84	3,600	65.13	-	-	-	-	-	-	69,445	64.68	7,000	62.84
24-Aug-17	86,040	65.50	125,000	66.40	-	-	19,850	66.40	1,250	64.80	-	-	7,000	63.71	8,300	66.30	94,290	65.36	153,150	66.40
27-Aug-17	-	-	53,000	73.00	4,600	72.50	12,845	73.00	-	-	-	-	-	-	-	-	4,600	72.50	65,845	73.00
28-Aug-17	215,407	80.24	-	-	19,200	79.04	-	-	-	-	-	-	5,000	77.54	6,200	80.30	239,607	80.09	6,200	80.30
29-Aug-17	-	-	86,000	85.66	-	-	3,100	88.05	-	-	-	-	-	-	800	86.80	-	-	89,900	85.66
30-Aug-17	-	-	-	-	-	-	8,336	84.64	-	-	-	-	5,000	82.96	5,000	84.62	5,000	82.96	13,336	84.62
31-Aug-17	-	-	215,447	89.23	-	-	3,964	88.84	-	-	-	-	-	-	-	-	-	-	219,411	89.23
4-Sep-17	-	-	-	-	-	-	1,400	99.30	-	-	-	-	-	-	5,000	97.70	-	-	6,400	99.30
5-Sep-17	-	-	-	-	-	-	7,000	103.80	-	-	5,630	104.80	-	-	-	-	-	-	12,630	104.80
6-Sep-17	-	-	-	-	1,500	110.60	-	-	-	-	-	-	-	-	-	-	1,500	110.60	-	-
Total	479,447	70.80	479,447	80.84	64,995	67.28	63,495	77.04	5,630	63.20	5,630	104.80	25,300	68.67	25,300	80.20	575,372	70.24	573,872	80.09

BANGLADESH SECURITIES AND EXCHANGE COMMISSION
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d) Combined effects:

Date	Buy			Sale			Cost of shares sold		Stock position			Comparison with the market				
	Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount	Mkt trade Qty (DSE-Normal)	Mkt weighted avg price (DSE-Normal)	Client Buy (%)	Client sale (%)	Client Trade (%)
	1	2	3 (1*2)	4	5	6 (4*5)	7	8 (4*7)	9 (9+1-4)	10	11 (9*10)	12	13	14 (1/12)	15 (4/12)	(14+15)
21-Aug-17	32,780	55.02	1,803,536	-	-	-	-	-	32,780	55.02	1,803,536	1,141,417	54.00	2.87%	0.00%	2.87%
22-Aug-17	128,150	61.26	7,849,959	-	-	-	-	-	160,930	59.99	9,653,495	736,129	60.63	17.41%	0.00%	17.41%
23-Aug-17	69,445	64.68	4,491,487	7,000	62.84	439,900	61.40	429,799	223,375	61.40	13,715,183	1,019,640	64.16	6.81%	0.69%	7.50%
24-Aug-17	94,290	65.36	6,162,968	153,150	66.39	10,168,330	62.58	9,583,488	164,515	62.58	10,294,663	965,981	65.55	9.76%	15.85%	25.62%
27-Aug-17	4,600	72.50	333,500	65,845	73.00	4,806,685	62.85	4,138,080	103,270	62.85	6,490,083	535,325	72.55	0.86%	12.30%	13.16%
28-Aug-17	239,607	80.09	19,190,190	6,200	80.30	497,860	74.90	464,358	336,677	74.90	25,215,915	699,153	79.55	34.27%	0.89%	35.16%
29-Aug-17	-	-	-	89,900	85.75	7,708,854	74.90	6,733,192	246,777	74.90	18,482,723	1,140,221	86.41	0.00%	7.88%	7.88%
30-Aug-17	5,000	82.96	414,800	13,336	84.63	1,128,667	75.06	1,000,955	238,441	75.06	17,896,568	494,515	84.96	1.01%	2.70%	3.71%
31-Aug-17	-	-	-	219,411	89.22	19,575,495	75.06	16,468,241	19,030	75.06	1,428,327	1,003,485	88.69	0.00%	21.86%	21.86%
4-Sep-17	-	-	-	6,400	98.05	627,520	75.06	480,362	12,630	75.06	947,965	410,931	98.87	0.00%	1.56%	1.56%
5-Sep-17	-	-	-	12,630	104.25	1,316,624	75.06	947,965	-	-	-	633,241	108.35	0.00%	1.99%	1.99%
6-Sep-17	1,500	110.60	165,900	-	-	-	-	-	1,500	110.60	165,900	889,994	112.95	0.17%	0.00%	0.17%
Total	575,372	70.24	40,412,340	573,872	80.63	46,269,935	70.13	40,246,440	1,500	110.60	165,900					
Realized gain/(loss) per unit			10.50													
Realized gain/(loss) %			14.97%													
Realized gain (loss) Tk.			6,023,495													
Cash dividend			-													
Closing price at DSE- 6-Sep-17			112.60													
Unrealized gain (loss) per unit			2.00													
Unrealized gain/(loss) %			1.81%													
Unrealized gain (loss) Tk.			3,000													



BANGLADESH SECURITIES AND EXCHANGE COMMISSION
Nagar Administrative Area, Dhaka-1207, Bangladesh.

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Findings: It is observed that Bangladesh Commerce Bank Limited (BCBL), Md. Abdul Halim (VP, Head of Investment and member of the investment decision, BCBL) and Mohammad Saiful Islam (VP, CFO and member of the investment decision, BCBL) effected manipulative transactions. They effected a series of transactions through the aforesaid 4 (four) BO accounts in the shares of **MONNOCERA** creating the appearance of active trading therein.

Contraventions: Bangladesh Commerce Bank Limited (BCBL), Md. Abdul Halim (VP, Head of Investment and member of the investment decision, BCBL) and Mohammad Saiful Islam (VP, CFO and member of the investment decision, BCBL) have violated section 17 (e) (v) of Securities and Exchange Ordinance, 1969 by directly or indirectly effecting a series of transactions in the shares of **MONNOCERA** creating the appearance of active trading therein.

**vi) LEGACYFOOT:
c) Individual trade patterns:**

Date	1				2				3				4				Total			
	1203000004128342				1203000026365549				1201590028159851				1203000039821463				Bangladesh Commerce Bank & associates			
	Bangladesh Commerce Bank				Md. Abdul Halim				Md. Abdul Halim				MOHAMMAD SAIFUL ISLAM							
	Commerce Bank Securities And Investment Ltd.				Commerce Bank Securities And Investment Ltd.				Royal Capital Ltd.				Commerce Bank Securities And Investment Ltd.							
	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR
13-May-18	-	-	-	-	3,000	62.53	-	-	-	-	-	-	-	-	-	-	3,000	62.53	-	-
15-May-18	-	-	-	-	2,000	63.70	2,000	64.01	-	-	-	-	-	-	-	-	2,000	63.70	2,000	64.01
16-May-18	-	-	-	-	3,000	66.00	-	-	-	-	-	-	-	-	-	-	3,000	66.00	-	-
17-May-18	8,000	65.50	-	-	-	-	1,000	65.60	-	-	-	-	-	-	-	-	8,000	65.50	1,000	65.60
20-May-18	-	-	-	-	-	-	5,000	70.43	-	-	-	-	-	-	-	-	-	-	5,000	70.43
21-May-18	-	-	8,000	72.63	11,000	72.41	-	-	6,300	74.29	-	-	-	-	-	-	17,300	73.09	8,000	72.63
22-May-18	-	-	-	-	500	77.30	-	-	-	-	-	-	-	-	-	-	500	77.30	-	-
23-May-18	-	-	-	-	4,000	84.50	11,000	79.58	6,000	84.00	6,300	83.50	4,400	78.90	-	-	14,400	82.58	17,300	81.01
27-May-18	-	-	-	-	-	-	1,500	84.70	-	-	1,400	83.92	4,400	83.80	4,400	82.50	4,400	83.80	7,300	83.22
28-May-18	-	-	-	-	7,000	84.80	3,000	89.80	-	-	4,600	89.23	-	-	-	-	7,000	84.80	7,600	89.46
29-May-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	50	85.00	-	-	50	85.00
30-May-18	-	-	-	-	-	-	5,000	86.52	-	-	-	-	-	-	-	-	-	-	5,000	86.52
31-May-18	-	-	-	-	12,600	90.00	2,000	91.95	5,000	87.98	-	-	-	-	-	-	17,600	89.42	2,000	91.95
3-Jun-18	-	-	-	-	4,000	90.35	-	-	-	-	-	-	-	-	4,350	90.90	4,000	90.35	4,350	90.90
4-Jun-18	50,000	86.00	-	-	-	-	2,100	91.93	-	-	-	-	-	-	-	-	50,000	86.00	2,100	91.93

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Date	1				2				3				4				Total			
	120300004128342				1203000026365549				1201590028159851				1203000039821463				Bangladesh Commerce Bank & associates			
	Bangladesh Commerce Bank				Md. Abdul Halim				Md. Abdul Halim				MOHAMMAD SAIFUL ISLAM							
	Commerce Bank Securities And Investment Ltd.				Commerce Bank Securities And Investment Ltd.				Royal Capital Ltd.				Commerce Bank Securities And Investment Ltd.							
BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	
5-Jun-18	-	-	-	-	-	-	-	-	-	-	1,750	84.31	-	-	-	-	-	-	1,750	84.31
6-Jun-18	-	-	-	-	3,000	84.89	1,500	87.00	3,000	84.00	3,000	87.40	-	-	-	-	6,000	84.45	4,500	87.27
7-Jun-18	-	-	30,000	91.97	-	-	10,100	93.16	-	-	-	-	-	-	-	-	-	-	40,100	92.27
10-Jun-18	40,000	92.46	-	-	5,000	94.80	-	-	3,000	93.70	3,000	92.50	-	-	-	-	48,000	92.78	3,000	92.50
11-Jun-18	-	-	-	-	-	-	2,100	89.00	-	-	-	-	-	-	-	-	-	-	2,100	89.00
12-Jun-18	-	-	-	-	-	-	3,000	88.60	-	-	2,000	88.30	-	-	-	-	-	-	5,000	88.48
18-Jun-18	-	-	28,747	92.00	-	-	5,800	93.05	-	-	1,250	91.83	-	-	-	-	-	-	35,797	92.16
19-Jun-18	-	-	31,253	92.14	-	-	-	-	-	-	-	-	-	-	-	-	-	-	31,253	92.14
21-Jun-18	80,000	90.76	-	-	7,000	90.20	-	-	1,700	90.29	-	-	-	-	-	-	88,700	90.71	-	-
26-Jun-18	-	-	-	-	-	-	7,000	81.51	-	-	-	-	-	-	-	-	-	-	7,000	81.51
27-Jun-18	-	-	-	-	-	-	-	-	-	-	1,200	79.40	-	-	-	-	-	-	1,200	79.40
2-Jul-18	-	-	-	-	-	-	-	-	-	-	500	82.80	-	-	-	-	-	-	500	82.80
3-Jul-18	-	-	-	-	4,000	86.90	-	-	3,000	86.80	-	-	-	-	-	-	7,000	86.86	-	-
4-Jul-18	-	-	-	-	3,000	94.30	-	-	1,000	94.20	-	-	-	-	-	-	4,000	94.28	-	-
5-Jul-18	-	-	-	-	-	-	1,000	109.60	-	-	1,000	109.60	-	-	-	-	-	-	2,000	109.60
8-Jul-18	-	-	-	-	-	-	-	-	-	-	1,000	120.50	-	-	-	-	-	-	1,000	120.50
9-Jul-18	-	-	-	-	-	-	5,350	130.82	-	-	-	-	-	-	-	-	-	-	5,350	130.82
Total	178,000	88.67	98,000	90.45	69,100	83.44	68,450	88.69	29,000	84.59	27,000	88.87	8,800	81.35	8,800	86.67	284,900	86.76	202,250	89.48

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d) Combined effects:

Date	Buy			Sale			Cost of shares sold		Stock position			Comparison with the market				
	Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount	Mkt trade Qty (DSE-Normal)	Mkt weighted avg price (DSE-Normal)	Client Buy (%)	Client sale (%)	Client Trade (%)
	1	2	3 (1*2)	4	5	6 (4*5)	7	8 (4*7)	9 (9+1-4)	10	11 (9*10)	12	13	14 (1/12)	15 (4/12)	16 (1/15)
13-May-18	3,000	62.53	187,600	-	-	-	-	-	3,000	62.53	187,600	1,278,532	62.40	0.23%	0.00%	0.00%
15-May-18	2,000	63.70	127,400	2,000	64.01	128,029	63.00	126,000	3,000	63.00	189,000	1,713,575	63.16	0.12%	0.12%	0.00%
16-May-18	3,000	66.00	198,000	-	-	-	-	-	6,000	64.50	387,000	1,213,006	65.80	0.25%	0.00%	0.00%
17-May-18	8,000	65.50	524,000	1,000	65.60	65,600	65.07	65,071	13,000	65.07	845,929	917,297	64.96	0.87%	0.11%	0.00%
20-May-18	-	-	-	5,000	70.43	352,135	65.07	325,357	8,000	65.07	520,571	1,533,682	69.12	0.00%	0.33%	0.33%
21-May-18	17,300	73.09	1,264,535	8,000	72.63	581,000	70.56	564,461	17,300	70.56	1,220,646	1,409,460	72.90	1.23%	0.57%	1.00%
22-May-18	500	77.30	38,650	-	-	-	-	-	17,800	70.75	1,259,296	1,638,986	77.06	0.03%	0.00%	0.00%
23-May-18	14,400	82.58	1,189,160	17,300	81.01	1,401,474	76.04	1,315,475	14,900	76.04	1,132,981	2,112,113	78.93	0.68%	0.82%	1.50%
27-May-18	4,400	83.80	368,700	7,300	83.22	607,540	77.81	567,993	12,000	77.81	933,688	1,506,363	84.46	0.29%	0.48%	0.87%
28-May-18	7,000	84.80	593,600	7,600	89.46	679,865	80.38	610,915	11,400	80.38	916,373	1,441,459	87.62	0.49%	0.53%	1.00%
29-May-18	-	-	-	50	85.00	4,250	80.38	4,019	11,350	80.38	912,353	1,030,583	86.80	0.00%	0.00%	0.00%
30-May-18	-	-	-	5,000	86.52	432,601	80.38	401,918	6,350	80.38	510,436	840,722	86.59	0.00%	0.59%	0.59%
31-May-18	17,600	89.42	1,573,855	2,000	91.95	183,905	87.03	174,053	21,950	87.03	1,910,237	1,606,643	90.14	1.10%	0.12%	1.22%
3-Jun-18	4,000	90.35	361,400	4,350	90.90	395,415	87.54	380,795	21,600	87.54	1,890,842	1,240,719	91.11	0.32%	0.35%	0.67%
4-Jun-18	50,000	86.00	4,300,000	2,100	91.93	193,060	86.46	181,575	69,500	86.46	6,009,267	1,173,740	89.67	4.26%	0.18%	4.44%
5-Jun-18	-	-	-	1,750	84.31	147,541	86.46	151,312	67,750	86.46	5,857,955	764,268	85.22	0.00%	0.23%	0.23%
6-Jun-18	6,000	84.45	506,672	4,500	87.27	392,700	86.30	388,350	69,250	86.30	5,976,277	829,374	85.54	0.72%	0.54%	1.26%
7-Jun-18	-	-	-	40,100	92.27	3,700,138	86.30	3,460,631	29,150	86.30	2,515,646	1,580,673	91.44	0.00%	2.54%	2.54%
10-Jun-18	48,000	92.78	4,453,430	3,000	92.50	277,500	90.33	270,995	74,150	90.33	6,698,081	1,063,379	93.32	4.51%	0.28%	4.79%
11-Jun-18	-	-	-	2,100	89.00	186,900	90.33	189,696	72,050	90.33	6,508,385	1,140,091	89.82	0.00%	0.18%	0.18%

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BANGLADESH SECURITIES AND EXCHANGE COMMISSION
 সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
 Dhaka, Bangladesh.



BANGLADESH SECURITIES AND EXCHANGE COMMISSION
 Dhaka
 Registrar
 10/A, Tejgaon
 Dhaka-1207, Bangladesh.

Date	Buy			Sale			Cost of shares sold		Stock position			Comparison with the market				
	Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount	Mkt trade Qty (DSE-Normal)	Mkt weighted avg price (DSE-Normal)	Client Buy (%)	Client sale (%)	Client Trade (%)
	1	2	3 (1*2)	4	5	6 (4*5)	7	8 (4*7)	9 (9+1-4)	10	11 (9*10)	12	13	14 (1/12)	15 (4/12)	16 (10/15)
12-Jun-18	-	-	-	5,000	88.48	442,400	90.33	451,658	67,050	90.33	6,056,728	851,237	88.03	0.00%	0.59%	0.59%
18-Jun-18	-	-	-	35,797	92.16	3,299,203	90.33	3,233,597	31,253	90.33	2,823,131	1,269,590	90.94	0.00%	2.82%	2.82%
19-Jun-18	-	-	-	31,253	92.14	2,879,639	90.33	2,823,131	-	-	-	1,566,829	92.81	0.00%	1.99%	1.99%
21-Jun-18	88,700	90.71	8,045,945	-	-	-	-	-	88,700	90.71	8,045,945	1,196,310	90.41	7.41%	0.00%	7.41%
26-Jun-18	-	-	-	7,000	81.51	570,600	90.71	634,967	81,700	90.71	7,410,977	598,785	80.49	0.00%	1.17%	1.17%
27-Jun-18	-	-	-	1,200	79.40	95,280	90.71	108,852	80,500	90.71	7,302,126	508,810	80.69	0.00%	0.24%	0.24%
2-Jul-18	-	-	-	500	82.80	41,400	90.71	45,355	80,000	90.71	7,256,771	540,038	79.82	0.00%	0.09%	0.09%
3-Jul-18	7,000	86.86	608,000	-	-	-	-	-	87,000	90.40	7,864,771	1,934,996	90.45	0.36%	0.00%	0.36%
4-Jul-18	4,000	94.28	377,100	-	-	-	-	-	91,000	90.57	8,241,871	1,967,708	98.74	0.20%	0.00%	0.20%
5-Jul-18	-	-	-	2,000	109.60	219,200	90.57	181,140	89,000	90.57	8,060,731	179,112	109.60	0.00%	1.12%	1.12%
8-Jul-18	-	-	-	1,000	120.50	120,500	90.57	90,570	88,000	90.57	7,970,161	251,945	120.50	0.00%	0.40%	0.40%
9-Jul-18	-	-	-	5,350	130.82	699,885	90.57	484,550	82,650	90.57	7,485,611	2,400,354	132.30	0.00%	0.22%	0.22%
Total	284,900	86.76	24,718,047	202,250	89.48	18,097,759	85.20	17,232,436	82,650	90.57	7,485,611					
Realized gain/(loss) per unit			4.28													
Realized gain/(loss) %			5.02%													
Realized gain (loss) Tk.			865,323													
Cash dividend			-													
Closing price at DSE- 10-Jul-18			145.70													
Unrealized gain (loss) per unit			55.13													
Unrealized gain/(loss) %			60.87%													
Unrealized gain (loss) Tk.			4,556,494													



BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

যেহেতু, বাংলাদেশ কমার্স ব্যাংক লিঃ এর ভাইস প্রেসিডেন্ট ও চীফ ফাইন্যান্সিয়াল অফিসার অ্যান্ড মেম্বর অব দি ইনভেস্টমেন্ট ডিসিশন জনাব মোহাম্মদ সাইফুল ইসলাম কে উপরোক্ত ব্যর্থতার জন্য কমিশন কর্তৃক ২৪ অক্টোবর ২০১৮ ইং তারিখের নং বিএসইসি/এনফোর্সমেন্ট/২৬২১/২০১৮/৪৪৫ নম্বর স্মারকমূলে জনাব মোহাম্মদ সাইফুল ইসলাম-কে নির্ধারিত তারিখে উপরোক্ত ব্যর্থতার কারণ প্রদর্শনসহ শুনানীতে উপস্থিত হতে বলা হয় এবং জনাব মোহাম্মদ সাইফুল ইসলাম উক্ত শুনানীতে ১২ নভেম্বর, ২০১৮ তে উপস্থিত হয়ে তার নিম্ন লিখিত বক্তব্য দাখিল করেন;

“(I) Reasons why I buy & sell shares of Monno Ceramic Ltd:

From a few national dailies and online news portals I came to know that there might be a change in the management of the Company. That gave me hope that the company would do good in future as well as with the following expectations:

- Production Capacity would increase
- The earning per shares would increase
- Market of its product would spread

The following table may please seen for my transaction records in Monno Ceramic Industries Ltd.:

Date	BQ	BR	SQ	SR	My Total buy and sale	Market Trade Quantity (DSE- Normal)	Client buy (%)	Client sale (%)	Total Trade (%)
21-Aug-17	-				-	1,141,417	0.00%	0.00%	0.00%
22-Aug-17	8,300	58.90			8,300	736,129	1.13%	0.00%	1.13%
23-Aug-17	-				-	1,019,640	0.00%	0.00%	0.00%
24-Aug-17	7,000	63.71	8,300	66.30	15,300	965,981	0.72%	0.86%	1.58%
27-Aug-17	-				-	535,325	0.00%	0.00%	0.00%
28-Aug-17	5,000	77.54	6,200	80.30	11,200	699,153	0.72%	0.89%	1.60%
29-Aug-17	-		800	86.80	800	1,140,221	0.00%	0.07%	0.07%
30-Aug-17	5,000	82.96	5,000	84.62	10,000	494,515	1.01%	1.01%	2.02%
31-Aug-17	-				-	1,003,485	0.00%	0.00%	0.00%
4-Sep-17	-		5,000	97.70	5,000	410,931	0.00%	1.22%	1.22%
5-Sep-17	-				-	633,241	0.00%	0.00%	0.00%
6-Sep-17	-				-	889,994	0.00%	0.00%	0.00%
Total	25,300		25,300		50,600	9,670,032	0.26%	0.26%	0.52%

From above table, it may be observed that I had not only purchased the shares but also sold those on matured date whenever I got profit. Hence, I solemnly express my humble submission that I did not do any malpractice while transacting the stocks of Monno Ceramics Industries Ltd. Moreover, I had bought only 0.26% shares of MONNOCERA traded at DSE.

(II) Reason I transacted shares of Legacy Footwear Ltd.

Again, I bought Legacyfoot for only 02 (two) days out of 32 (thirty two) trading days reported in the letter. The reason of my trading was the price and volume of LEGACYFOOT was increasing sharply at that time. I did not have any mala-fide intention to buying and selling shares of Legacyfoot. I started trading the shares 23/05/2018 sold my portion on 03/06/18 within Tk. 90.90. However, the price of the stock increased to Tk. 132.5 by 09/07/18 the final date of transaction as per BSEC table. But I did not have any participation to that.



BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Summarized report of my transaction:

My buy volume compared to total volume traded at DSE in the reported stocks are as under:

Particulars	MONNOCERA	LEGACYFOOT
Total buy volume	25,300	8800
Total transaction in DSE	9,670,032	39,292,829
% of DSE	0.73%	0.25%

As you glance through the above table, you will find that my buy volume was very insignificant to the total traded volume of the reported stock on that vary reported day at DSE.

From above table, it could be observed that my trading percentage in the reported stocks were so insignificant it could hardly abuse the movement of the price or volume of any stock.

(III) Besides, I participate in stock trading based on my individual capacity, hence the question of being associated with Bangladesh Commerce Bank Ltd. or with any others for that matter, while taking my investment decisions, does not arise.

(IV) I also declare that I would close my BO account maintained with CBSIL after receiving of few bonus shares as per instruction of our bank authority. This is also to be noted here that I kept my trading stopped in that account after receiving the instruction of the bank authority.

I also solemnly express my humble submission to you that I did not buy or sell shares of Monno Ceramic Industries Ltd. and Legacy Footwear Ltd. to violate section 17 (e) (v) of Securities and Exchange Ordinance, 1969.

I try my level best to comply with rules and regulations of BSEC and other regulatory bodies of my beloved country.

I also take this opportunity to solemnly commit to you that I will continue to comply all rules & regulations of BSEC now and in the days to come."

জনাব মোহাম্মদ সাইফুল ইসলাম এর লিখিত বক্তব্য কমিশনের বিচেনায় গ্রহণযোগ্য হয়নি।

যেহেতু, জনাব মোহাম্মদ সাইফুল ইসলাম এর লিখিত বক্তব্য কমিশনের বিবেচনায় গ্রহণযোগ্য হয়নি, যা সিকিউরিটিজ আইন পরিপালনে ব্যর্থতা বিধায় section 22 of the Securities and Exchange Ordinance, 1969 অনুযায়ী শাস্তিযোগ্য অপরাধ এবং যা ক্ষমার অযোগ্য;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন পরিপালনে উল্লিখিত ব্যর্থতার জন্য, তথা পুঁজিবাজারের উন্নয়নের পাশাপাশি বাজারের শৃংখলা ও স্বচ্ছতা রক্ষার স্বার্থে জনাব মোহাম্মদ সাইফুল ইসলাম কে জরিমানা করা প্রয়োজন ও সমীচীন;

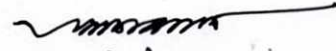


BANGLADESH SECURITIES AND EXCHANGE COMMISSION

Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

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] এ প্রদত্ত ক্ষমতাবলে বাংলাদেশ কমার্স ব্যাংক লিঃ এর ভাইস প্রেসিডেন্ট ও চীফ ফাইন্যান্সিয়াল অফিসার অ্যান্ড মেম্বার অব দি ইনভেস্টমেন্ট ডিসিশন জনাব মোহাম্মদ সাইফুল ইসলাম এর উপর ২৫ (পঁচিশ) লক্ষ টাকা জরিমানা ধার্য করা হল। উক্ত জরিমানার অর্থ আদেশের তারিখ হতে ১৫ (পনের) দিনের মধ্যে ' বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা করতে হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


02/08/2022

খান্দকার কামালউজ্জামান
কমিশনার

বিতরণঃ

জনাব মোহাম্মদ সাইফুল ইসলাম
ভাইস প্রেসিডেন্ট ও চীফ ফাইন্যান্সিয়াল অফিসার অ্যান্ড মেম্বার অব দি ইনভেস্টমেন্ট ডিসিশন
বাংলাদেশ কমার্স ব্যাংক লিঃ
(বিও আইডি : ১২০৩০০০০৩৯৮২১৪৬৩)
কমার্স ব্যাংক সিকিউরিটিজ অ্যান্ড ইনভেস্টমেন্ট লিঃ
তরঙ্গ কমপ্লেক্স, ৩য় তলা, ১৯ রাজউক এ্যাভিনিউ,
মতিঝিল, ঢাকা-১০০০।