



# BANGLADESH SECURITIES AND EXCHANGE COMMISSION

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

বিএসইসি/এনফোর্সমেন্ট/২৬২১/২০১৮/১৮৩

তারিখঃ ০২ এপ্রিল, ২০১৯ ইং

আদেশ

বেহেতু, 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;

বেহেতু, 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).

### 1) 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





**BANGLADESH SECURITIES AND EXCHANGE COMMISSION**  
 Securities Commission Bhdban, E-6/C Aagarzon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

**i) MONNOSTAF:  
a) 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
<b>Total</b>	<b>8,938</b>	<b>1,363.50</b>	<b>8,938</b>	<b>1,536.85</b>	<b>870</b>	<b>1,473.94</b>	<b>870</b>	<b>1,636.04</b>	<b>226</b>	<b>1,620.23</b>	<b>226</b>	<b>1,877.57</b>	<b>10,034</b>	<b>1,378.85</b>	<b>10,034</b>	<b>1,553.13</b>

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**b) 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 (%)	
	1	2	3 (1*2)	4	5	6 (4*5)	7	8 (4*7)	9(9+14)	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%
<b>Total</b>	<b>10,034</b>	<b>1,378.85</b>	<b>13,835,420</b>	<b>10,034</b>	<b>1,553.13</b>	<b>15,584,080</b>	<b>1,378.85</b>	<b>13,835,420</b>	-	-	-					
<b>Realized gain/(loss) per unit</b>			<b>174.27</b>													
<b>Realized gain/(loss) %</b>			<b>12.64%</b>													
<b>Realized gain (loss) Tk.</b>			<b>1,748,660</b>													
<b>Cash dividend</b>			-													
<b>Closing price at DSE- 21-Jun18</b>			<b>3,452.10</b>													
<b>Unrealized gain (loss) per unit</b>			-													
<b>Unrealized gain/(loss) %</b>			<b>0.00%</b>													
<b>Unrealized gain (loss) Tk.</b>			-													



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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) 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.

**ii) MONNOCERA:**

**a) Individual trade patterns:**

Date	1				2				3				4				Total			
	1203000004128342				1203000026365549				1201590028159851				1203000039821463				Bangladesh Commerce Bank & associated			
	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	1,000	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	15,150	66.39
27-Aug-17	-	-	53,000	73.00	4,600	72.50	12,845	73.00	-	-	-	-	-	-	-	-	4,600	72.50	6,845	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	9,200	80.30
29-Aug-17	-	-	86,000	85.66	-	-	3,100	88.05	-	-	-	-	-	-	800	86.80	-	-	8,900	85.75
30-Aug-17	-	-	-	-	-	-	8,336	84.64	-	-	-	-	5,000	82.96	5,000	84.62	5,000	82.96	1,336	84.63
31-Aug-17	-	-	215,447	89.23	-	-	3,964	88.84	-	-	-	-	-	-	-	-	-	-	21,414	89.22
4-Sep-17	-	-	-	-	-	-	1,400	99.30	-	-	-	-	-	-	5,000	97.70	-	-	4,400	98.05
5-Sep-17	-	-	-	-	-	-	7,000	103.80	-	-	5,630	104.80	-	-	-	-	-	-	1,630	104.25
6-Sep-17	-	-	-	-	1,500	110.60	-	-	-	-	-	-	-	-	-	-	1,500	110.60	-	-
<b>Total</b>	<b>479,447</b>	<b>70.80</b>	<b>479,447</b>	<b>80.84</b>	<b>64,995</b>	<b>67.28</b>	<b>63,495</b>	<b>77.04</b>	<b>5,630</b>	<b>63.20</b>	<b>5,630</b>	<b>104.80</b>	<b>25,300</b>	<b>68.67</b>	<b>25,300</b>	<b>80.20</b>	<b>575,372</b>	<b>70.24</b>	<b>57,875</b>	<b>80.63</b>



**BANGLADESH SECURITIES AND EXCHANGE COMMISSION**  
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**BANGLADESH SECURITIES AND EXCHANGE COMMISSION**  
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**b) 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 (14/15)
	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%	25.22%
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%
<b>Total</b>	<b>575,372</b>	<b>70.24</b>	<b>40,412,340</b>	<b>573,872</b>	<b>80.63</b>	<b>46,269,935</b>	<b>70.13</b>	<b>40,246,440</b>	<b>1,500</b>	<b>110.60</b>	<b>165,900</b>					
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													

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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.

**iii) LEGACYFOOT:**

**a) 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





**BANGLADESH SECURITIES AND EXCHANGE COMMISSION**  
Securities Commission Bhaban, F-6/C Aargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

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
<b>Total</b>	<b>178,000</b>	<b>88.67</b>	<b>98,000</b>	<b>90.45</b>	<b>69,100</b>	<b>83.44</b>	<b>68,450</b>	<b>88.69</b>	<b>29,000</b>	<b>84.59</b>	<b>27,000</b>	<b>88.87</b>	<b>8,800</b>	<b>81.35</b>	<b>8,800</b>	<b>86.67</b>	<b>284,900</b>	<b>86.76</b>	<b>202,250</b>	<b>89.48</b>

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

**b) 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)
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%	0.98%
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%	1.80%
22-May-18	500	77.30	38,650	-	-	-	-	-	17,800	70.75	1,259,296	1,638,986	77.06	0.03%	0.00%	0.03%
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%	0.77%
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%	1.02%
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%	4.80%
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%
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%

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BANGLADESH SECURITIES AND EXCHANGE COMMISSION  
Bangla Nagar Administrative Area, 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 Buy (%)
	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)
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%
<b>Total</b>	<b>284,900</b>	<b>86.76</b>	<b>24,718,047</b>	<b>202,250</b>	<b>89.48</b>	<b>18,097,759</b>	<b>85.20</b>	<b>17,232,436</b>	<b>82,650</b>	<b>90.57</b>	<b>7,485,611</b>					
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 প্রেসিডেন্টএবং হেড অব ইনভেস্টমেন্ট অ্যান্ড মেম্বার অব দি ইনভেস্টমেন্ট ডিসিশন জনাব মোঃ আব্দুল হালিম-কে উপরোক্ত ব্যর্থতার জন্য কমিশন কর্তৃক ২৪ অক্টোবর ২০১৮ ইং তারিখের নং বিএসইসি/এনফোর্সমেন্ট/২৬২১/২০১৮/৪৪৫ নম্বর স্মারকমূলে জনাব মোঃ আব্দুল হালিম-কে নির্ধারিত তারিখে উপরোক্ত ব্যর্থতার কারণ প্রদর্শনসহ শুনানীতে উপস্থিত হতে বলা হয় এবং জনাব মোঃ আব্দুল হালিম উক্ত শুনানীতে ১২ নভেম্বর, ২০১৮ তে উপস্থিত হয়ে তার নিম্ন লিখিত বক্তব্য দাখিল করেন;

"Before my explanation, I would like to draw your kind attention to my investment in capital market for the reported BO IDs

**Capital Gain/(Loss) in my reported portfolios as on 21/08/2017 and 25/06/2018 is as under:**

Sl.	Code No.	Account open date	Net Investment Size	Total Capital Gain/ (Loss) as on 31.10.2018	Return On Investment	Investment Duration ; about
1	4595	19/01/2010	6,748,200	(260,450)	(3.85%)	8 years 10 months
2	76931	10/02/2010	25,73,500	(2,105,884)	(81.83%)	8 years 09 months
<b>Grand Total</b>			<b>93,21,700</b>	<b>23,66,334</b>	<b>(25.38%)</b>	

As you glance through the above table, you find that I already incurred capital loss totaling Tk. 23.66 lac out of my total capital of Tk. 93.22 lac, being 25.38% loss.

**(I) Reason I started transacting and frequently buy and sell shares of Monno Staffler Ltd.**

The price of Monno Jute Stafflers Ltd. on 01 April, 2018 was Tk. 846.60 which went to Tk. 947.00 on 08 April, 2018 giving signals of up word trained of prices of the stock. BCB had purchased 8,200 no of shares on 09/04/2018 and sold the same on 11/04/2018 giving clear signal that it had no other intention but to earn some return on the investment.

**(II) Reasons why I frequently buy & sell shares of Monno Ceramic Ltd:**

- Ever increasing earning per shares
- Doubly increased production Capacity
- Uninterrupted supply of Gas by Govt. (But it was not so earlier)
- Enlightened new management with new vision
- World-wide market of its products
- Steadily growing demand of its products home and abroad.
- High net worth company.

**(III) Reason I frequently transacted shares of Legacy Footwear Ltd.**

I observed that the there was a sharp movement of the price and volume of Legacy footwear Ltd. on 09/05/2018. I started to buy and selling the share from 13/05/2018 thinking that it was the beginning of a trend for it only with the hope of recovering some of my capital erosion. There was in no way any intention to manipulate its price or volume.





# 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	MONNOSTAF	MONNOCERA	LEGACYFOOT
Total buy volume	1096	70,625	98,100
Total transaction in DSE	175,156	9,670,032	39,292,829
% of DSE	0.63%	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 reported stocks were so insignificant that neither it could influence the market price of a stock nor it could influence the volume of any stock.

**Besides, I take investment decisions of my own. There was never any association with any person or entity while taking my investment decisions.**

**It is also to be noted here that I have already closed my BO account with Commerce Bank Securities and Investment Ltd. in compliance with instruction circular of my bank BCBL.**

I also solemnly declare you that I did not buy or sell shares of Monno Ceramic Industries Ltd. and Legacy Footwear Ltd. 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.

Again, I did not 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, direct or manipulation upon any person, in particular-

Again, I did not commit anything directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or raising of price for the purpose of inducing its purchase by others or depressing its price for the purpose of inducing its sale by others.

As a Tax-paying peace-loving, Law-abiding citizen of Bangladesh, I try to the utmost to comply with rules and regulations of BSEC and other regulatory bodies of my beloved Bangladesh.

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 মোঃ আব্দুল হালিম এর লিখিত বক্তব্য কমিশনের বিচেনায় গ্রহণযোগ্য হয়নি।

যেহেতু, জনাব মোঃ আব্দুল হালিম 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 মোঃ আব্দুল হালিম 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 এবং হেড অব ইনভেস্টমেন্ট অ্যান্ড মেম্বার অব দি ইনভেস্টমেন্ট ডিসিশন জনাব মোঃ আব্দুল হালিম 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,

  
০২/০৪/২০২১

খোন্দকার কামালউজ্জামান  
কমিশনার

## বিতরণঃ

জনাব মোঃ আব্দুল হালিম, ভাইস প্রেসিডেন্ট এবং  
হেড অব ইনভেস্টমেন্ট অ্যান্ড মেম্বার অব দি ইনভেস্টমেন্ট ডিসিশন  
বাংলাদেশ কমার্স ব্যাংক লিঃ  
(বিও আইডি : ১২০৩০০০০২৬৩৬৫৫৪৯ এবং ১২০১৫৯০০২৮১৫৯৮৫১)  
কমার্স ব্যাংক সিকিউরিটিজ অ্যান্ড ইনভেস্টমেন্ট লিঃ  
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