



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

নং-বিএসইসি/এনফোর্সমেন্ট/২৬২৮/২০১৮/২২৬

তারিখঃ ০৮ মার্চ, 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;

Whereas, As per section 17(e) (v) of the Securities and Exchange Ordinance, 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 fraud, deceit or manipulation upon any person, in particular-

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

Mentionable that As per enquiry order no. BSEC/Surveillance/2018-911/30, dated-August 16, 2018. The enquiry team of BSEC conducts the enquiry on recent unusual movement of price and volume of shares of the Bangladesh Autocars Limited and Legacy Footwear Ltd. in the stock exchanges in favor of its Clients and other related parties. From the enquiry report it appears, among others, that:

The following persons/group of persons and institution was involved in manipulative transactions (Data taken from the transaction ledgers, instrument ledgers and the Instant Watch Market Surveillance System).

Mr. Md. Azimul Islam and associates:

SL.	BO ID	Name	Name of the DP	Relationship
1	1203040000098342	MD. AZIMUL ISLAM	Md. Fakhru Islam Securities Ltd.	Managing Director of Alif Textiles Ltd.
2	1203000000099130	LUTFUN NESSA ISLAM	Commerce Bank Securities And Investment Ltd.	Mother
3	1203000050216023	ALIF TEXTILES LTD.	Commerce Bank Securities And Investment Ltd.	Managing Director
4	1203000064875619	NABILA SALAM	Commerce Bank Securities And Investment Ltd.	Spouse



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

5	1203000064984433	BAITUL MAMOOR	Commerce Bank Securities And Investment Ltd.	Father's proprietorship business
6	1202140032837911	MD. AZIZUL ISLAM	Dragon Securities Ltd.	Father
7	1202140000080314	MD. AZIZUL ISLAM	Dragon Securities Ltd.	Father
8	1203040000080314	MD. AZIZUL ISLAM	Md. Fakhru Islam Securities Ltd.	Father

Handwritten signature

i) BDAUTOCA at DSE (public market):

a) Individual patterns (Mr. Md. Azimul Islam and associates):

Date	1				2				3				Total			
	120300000099130				1203000050216023				1203040000098342							
	LUTFUN NESSA ISLAM				ALIF TEXTILES LTD.				MD. AZIMUL ISLAM							
	Commerce Bank Securities And Investment Ltd.				Commerce Bank Securities And Investment Ltd.				Md. Fakhruul Islam Securities Ltd.							
	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR
6-Jun-18	-	-	-	-	52,378	152.55	-	-	-	-	-	-	52,378	152.55	-	-
7-Jun-18	-	-	-	-	63,000	165.68	-	-	-	-	-	-	63,000	165.68	-	-
10-Jun-18	-	-	-	-	-	-	52,378	176.52	-	-	-	-	-	-	52,378	176.52
11-Jun-18	180,000	183.38	-	-	-	-	-	-	-	-	-	-	180,000	183.38	-	-
18-Jun-18	-	-	-	-	15,497	196.46	-	-	-	-	-	-	15,497	196.46	-	-
19-Jun-18	63,515	217.75	-	-	28,000	214.76	-	-	-	-	-	-	91,515	216.84	-	-
24-Jun-18	-	-	-	-	-	-	-	-	5,309	263.09	-	-	5,309	263.09	-	-
3-Jul-18	1,630	395.90	-	-	-	-	-	-	-	-	-	-	1,630	395.90	-	-
5-Jul-18	-	-	-	-	-	-	-	-	6,139	454.67	-	-	6,139	454.67	-	-
8-Jul-18	-	-	-	-	-	-	-	-	78,803	417.71	-	-	78,803	417.71	-	-
9-Jul-18	-	-	-	-	-	-	-	-	5	406.00	-	-	5	406.00	-	-
12-Jul-18	-	-	-	-	-	-	32,660	343.08	-	-	-	-	-	-	32,660	343.08
15-Jul-18	-	-	92,050	370.10	-	-	70,000	370.10	-	-	-	-	-	-	162,050	370.10
16-Jul-18	-	-	-	-	-	-	3,837	360.80	-	-	-	-	-	-	3,837	360.80
17-Jul-18	-	-	-	-	-	-	-	-	-	-	28,428	334.45	-	-	28,428	334.45
18-Jul-18	-	-	-	-	-	-	-	-	-	-	48,956	344.37	-	-	48,956	344.37
19-Jul-18	-	-	-	-	-	-	-	-	-	-	12,872	310.06	-	-	12,872	310.06
22-Jul-18	-	-	100,000	330.10	-	-	-	-	-	-	-	-	-	-	100,000	330.10
29-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	700	324.58	-	-
30-Jul-18	-	-	-	-	20,000	342.70	-	-	-	-	-	-	20,000	342.70	-	-
31-Jul-18	11,100	388.15	-	-	42,000	383.39	-	-	-	-	-	-	62,935	384.96	-	-
1-Aug-18	6,160	408.10	-	-	120	400.10	-	-	-	-	-	-	35,889	402.66	-	-
2-Aug-18	-	-	-	-	9,755	397.94	-	-	-	-	-	-	11,255	398.36	-	-
5-Aug-18	13,200	411.49	-	-	1,500	413.70	-	-	-	-	-	-	28,900	407.68	-	-
6-Aug-18	270	403.80	-	-	-	-	-	-	-	-	-	-	770	403.93	-	-
9-Aug-18	18,924	420.56	-	-	9,600	420.60	-	-	-	-	-	-	28,524	420.58	-	-
13-Aug-18	600	435.93	-	-	200	432.93	-	-	-	-	-	-	17,694	439.53	-	-
Total	295,399	230.43	192,050	349.27	242,050	244.24	158,875	300.50	90,256	411.13	90,256	336.35	700,943	277.04	441,181	329.07



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭ বাংলাদেশ।

Handwritten signature

b) Combined effects-BDAUTOCA at DSE (public market) by Mr. Md. Azimul Islam and associates:

Opening balance:0 shares

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-Public market)	Mkt price (DSE-Public market)	Market price changed by	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	15 (1/12)	16 (4/12)	17 (15+16)
6-Jun-18	52,378	152.55	7,990,452	-	-	-	-	-	52,378	152.55	7,990,452	331,360	151.77	0.00%	15.81%	0.00%	15.81%
7-Jun-18	63,000	165.68	10,438,097	-	-	-	-	-	115,378	159.72	18,428,549	449,782	166.64	9.79%	14.01%	0.00%	14.01%
10-Jun-18	-	-	-	52,378	176.52	9,245,774	159.72	8,365,984	63,000	159.72	10,062,565	226,109	180.13	0.00%	0.00%	23.16%	23.16%
11-Jun-18	180,000	183.38	33,008,793	-	-	-	-	-	243,000	177.25	43,071,358	536,859	178.44	-0.94%	33.53%	0.00%	33.53%
18-Jun-18	15,497	196.46	3,044,577	-	-	-	-	-	258,497	178.40	46,115,935	222,858	189.74	0.00%	6.95%	0.00%	6.95%
19-Jun-18	91,515	216.84	19,843,835	-	-	-	-	-	350,012	188.45	65,959,770	393,633	215.79	13.73%	23.25%	0.00%	23.25%
24-Jun-18	5,309	263.09	1,396,746	-	-	-	-	-	355,321	189.57	67,356,515	155,544	256.02	0.00%	3.41%	0.00%	3.41%
3-Jul-18	1,630	395.90	645,317	-	-	-	-	-	356,951	190.51	68,001,832	201,652	396.22	-0.72%	0.81%	0.00%	0.81%
5-Jul-18	6,139	454.67	2,791,220	-	-	-	-	-	363,090	194.97	70,793,052	152,964	451.12	6.42%	4.01%	0.00%	4.01%
8-Jul-18	78,803	417.71	32,916,980	-	-	-	-	-	441,893	234.69	103,710,032	225,286	439.59	0.00%	34.98%	0.00%	34.98%
9-Jul-18	5	406.00	2,030	-	-	-	-	-	441,898	234.70	103,712,062	132,300	409.48	-6.85%	0.00%	0.00%	0.00%
12-Jul-18	-	-	-	32,660	343.08	11,204,945	234.70	7,665,199	409,238	234.70	96,046,863	139,949	345.70	-12.93%	0.00%	23.34%	23.34%
15-Jul-18	-	-	-	162,050	370.10	59,974,705	234.70	38,032,622	247,188	234.70	58,014,241	293,297	369.19	0.00%	0.00%	55.25%	55.25%
16-Jul-18	-	-	-	3,837	360.80	1,384,372	234.70	900,532	243,351	234.70	57,113,709	110,091	357.91	-3.06%	0.00%	3.49%	3.49%
17-Jul-18	-	-	-	28,428	334.45	9,507,769	234.70	6,671,962	214,923	234.70	50,441,748	246,168	328.15	-8.31%	0.00%	11.55%	11.55%
18-Jul-18	-	-	-	48,956	344.37	16,858,840	234.70	11,489,818	165,967	234.70	38,951,930	172,684	343.19	4.58%	0.00%	28.35%	28.35%
19-Jul-18	-	-	-	12,872	310.06	3,991,130	234.70	3,021,018	153,095	234.70	35,930,912	256,501	307.49	-10.40%	0.00%	5.02%	5.02%
22-Jul-18	-	-	-	100,000	330.10	33,010,000	234.70	23,469,683	53,095	234.70	12,461,228	387,533	327.47	0.00%	0.00%	25.80%	25.80%
29-Jul-18	700	324.58	227,209	-	-	-	-	-	53,795	235.87	12,688,437	106,458	322.94	0.00%	0.66%	0.00%	0.66%
30-Jul-18	20,000	342.70	6,854,000	-	-	-	-	-	73,795	264.82	19,542,437	229,802	346.98	7.44%	8.70%	0.00%	8.70%
31-Jul-18	62,935	384.96	24,227,746	-	-	-	-	-	136,730	320.12	43,770,184	287,276	380.99	9.80%	21.91%	0.00%	21.91%
1-Aug-18	35,889	402.66	14,450,913	-	-	-	-	-	172,619	337.28	58,221,096	221,693	401.29	5.33%	16.19%	0.00%	16.19%
2-Aug-18	11,255	398.36	4,483,561	-	-	-	-	-	183,874	341.02	62,704,657	157,976	402.27	0.25%	7.12%	0.00%	7.12%
5-Aug-18	28,900	407.68	11,782,054	-	-	-	-	-	212,774	350.07	74,486,711	117,111	403.64	0.00%	24.68%	0.00%	24.68%
6-Aug-18	770	403.93	311,026	-	-	-	-	-	213,544	350.27	74,797,737	226,549	409.96	1.57%	0.34%	0.00%	0.34%
9-Aug-18	28,524	420.58	11,996,523	-	-	-	-	-	242,068	358.55	86,794,261	165,364	425.07	-0.02%	17.25%	0.00%	17.25%
13-Aug-18	17,694	439.53	7,777,123	-	-	-	-	-	259,762	364.07	94,571,383	165,159	448.03	-0.70%	10.71%	0.00%	10.71%
Total	700,943	277.04	194,188,201	441,181	329.07	145,177,534	225.80	99,616,818	259,762	364.07	94,571,383	6,311,958	306.30	101.81%	11.11%	6.99%	18.09%



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

ফোন (পিএবিএক্স) : +৮৮-০২-৫৫০০১৭৩১-২, ফ্যাক্স : +৮৮-০২-৫৫০০১৭৩৬, ই-মেইল : secibd@bdmail.net, ওয়েব : www.sec.gov.bd



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

Gain/loss by Mr. Md. Azimul Islam and associates from the trading of BDAUTOCA at DSE (Public + Block):

Buy			Sale			Cost of shares sold		Stock position		
Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount
700,943	277.04	194,188,201	494,276	327.65	161,948,884	226.75	112,078,046	206,667	397.31	82,110,155

Realized capital gain/(loss) per unit	100.90
Realized capital gain/(loss) %	44.50%
Realized capital gain (loss) Tk.	49,870,838
Closing price at DSE- 13-Aug-2018	457.50
Unrealized gain (loss) per unit	60.19
Unrealized gain/(loss) %	15.15%
Unrealized gain (loss) Tk.	12,439,998

Findings: It is observed that Azimul Islam and associates effected manipulative transactions. They effected a series of transactions through the aforesaid 3 (three) BO accounts in the shares of BDAUTOCA creating the appearance of active trading therein.

Contraventions: It appears that Azimul Islam and associates 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 BDAUTOCA creating the appearance of active trading therein.

d) Acquiring substantial number of shares by Mr. Md. Azimul Islam and associates without compliance:

Bangladesh Autocars Limited has 38,62,512 number of shares outstanding.

Daily share balance of BDAUTOCA by Mr. Md. Azimul Islam and associates are as follows:

Date	Buy	Sale	Balance
Opening	-	-	-
6-Jun-18	52,378	-	52,378
7-Jun-18	63,000	-	115,378
10-Jun-18	-	52,378	63,000
11-Jun-18	180,000	-	243,000
18-Jun-18	15,497	-	258,497
19-Jun-18	91,515	-	350,012
24-Jun-18	5,309	-	355,321
3-Jul-18	1,630	-	356,951
5-Jul-18	6,139	-	363,090
8-Jul-18	78,803	-	441,893
9-Jul-18	5	-	441,898
12-Jul-18	-	32,660	409,238



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগাবর্গাও, শের-ই-বাংলা নগর পশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

Date	Buy	Sale	Balance
15-Jul-18	-	162,050	247,188
16-Jul-18	-	3,837	243,351
17-Jul-18	-	28,428	214,923
18-Jul-18	-	48,956	165,967
19-Jul-18	-	12,872	153,095
22-Jul-18	-	153,095	-
29-Jul-18	700	-	700
30-Jul-18	20,000	-	20,700
31-Jul-18	62,935	-	83,635
1-Aug-18	35,889	-	119,524
2-Aug-18	11,255	-	130,779
5-Aug-18	28,900	-	159,679
6-Aug-18	770	-	160,449
9-Aug-18	28,524	-	188,973
13-Aug-18	17,694	-	206,667
Total	700,943	494,276	206,667

Aggregate holdings of BDAUTOCA shares on July 5, 2018 was 3,63,090. They bought 78,803 shares on July 8, 2018 raising their shareholdings to 4,41,893 which was above 10% of the outstanding shares of BDAUTOCA.

Findings:

It is found that Mr. Md. Azimul Islam and associates bought shares of BDAUTOCA without following বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লম্বযোগ্য সংখ্যক শেয়ারঅর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

Contravention:

Through the aforesaid activities, it appears that Mr. Md. Azimul Islam and associates violated বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লম্বযোগ্য সংখ্যক শেয়ারঅর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by jointly acquiring more than 10% shares of BDAUTOCA without following the above mentioned law.

ii) LEGACYFOOT at DSE (public market):

a) Individual patterns (Mr. Md. Azimul Islam and associates):

Date	1				2				3				4				5				6				7				8				Total							
	120300064984433				120300050216023				120300064875619				120304000098342				12030000099130				12030000000011				12030000000014				120304000080314											
	BAITUL MAMOOR				ALF TEXTILES LTD.				NABILA SALAM				MD. AZIMUL ISLAM				LUTFUN NESSA ISLAM				MD. AZIZUL ISLAM				MD. AZIZUL ISLAM				MD. AZIZUL ISLAM											
	Commerce Bank Securities And Investment Ltd.				Commerce Bank Securities And Investment Ltd.				Commerce Bank Securities And Investment Ltd.				Md. Fakhru Islam Securities Ltd.				Commerce Bank Securities And Investment Ltd.				Dragon Securities Ltd.				Dragon Securities Ltd.				Md. Fakhru Islam Securities Ltd.											
	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	SQ	SR					BQ	BR	SQ	SR
2-Jul-18	-	-	-	-	-	-	-	-	141,290	82.66	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	141,290	82.66	-	-				
3-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,700	89.06	-	-			
4-Jul-18	230,000	99.70	-	-	-	-	-	-	380,000	98.55	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	610,000	98.98	-	-		
9-Jul-18	150,000	132.50	-	-	200,000	132.50	-	-	200,000	132.50	-	-	-	-	-	-	50,000	132.47	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	600,000	132.50	-	-		
11-Jul-18	56,000	160.00	288,580	160.20	-	-	-	-	-	-	-	-	120,300	160.15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	176,300	160.10	288,580	160.20		
12-Jul-18	-	-	-	-	272,458	151.17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	272,458	151.17	-	-		
15-Jul-18	-	-	-	-	130,000	167.46	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	130,000	167.46	-	-			
16-Jul-18	87,653	171.99	-	-	117,430	183.99	-	-	-	-	-	-	38,856	169.56	-	-	180,000	178.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-	14,655	166.53	-	438,594	177.58	-	-	
17-Jul-18	173,235	174.55	-	-	4,800	173.00	-	-	3,000	173.50	-	-	100,000	184.80	-	-	12,000	173.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	293,035	177.95	-	-		
18-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	126,202	194.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6,600	195.69	-	132,802	194.94	-	-	
19-Jul-18	-	-	-	-	187,000	186.18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	278,167	200.21	-	-	98,926	205.01	-	-	-	-	-	-	564,093	196.40	-	-			
22-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	117,200	204.57	-	-	-	-	22,400	201.55	-	-	-	-	-	-	-	-	-	6,800	203.11	-	146,400	204.05	-	-	
23-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	13,000	212.68	-	13,000	212.68	11,121	214.35
24-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	-	34,801	214.04	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	34,801	214.04	-	-
25-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	-	18,614	215.18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,000	192.00	-	2,000	192.00	18,614	215.18
29-Jul-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5,000	188.20	-	5,000	188.20	-	-
31-Jul-18	-	-	7,905	213.09	-	-	73,130	220.76	-	-	12,946	222.49	-	-	-	-	-	-	20,000	220.90	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	113,981	220.45	
1-Aug-18	-	-	55,811	213.70	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12,083	215.08	1,700	214.68	-	-	800	214.15	-	-	-	-	-	-	-	2,000	214.47	67,894	213.94			
2-Aug-18	-	-	-	-	-	-	20,000	227.00	-	-	26,392	227.22	-	-	-	-	-	-	20,000	227.00	-	-	-	-	-	-	-	-	-	-	-	-	-	16,000	226.11	-	16,000	226.11	66,392	227.09
5-Aug-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4,000	231.55	-	-	-	-	-	-	-	-	-	-	-	-	1,700	230.55	-	1,700	230.55	4,000	231.55	
6-Aug-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,900	213.32	-	-	-	-	-	-	-	-	-	-	-	-	3,900	213.32	-	-		
9-Aug-18	-	-	-	-	-	-	-	-	-	-	-	-	20,338	265.90	-	-	-	-	-	-	1,950	249.64	-	-	-	-	-	-	-	-	-	-	-	-	-	22,288	264.48	-	-	
12-Aug-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	800	259.41	-	-	-	-	-	-	-	-	-	-	-	30,154	275.49	-	30,954	275.07	-	-
13-Aug-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,800	271.94	-	-	-	-	-	-	-	-	-	-	5,000	270.95	-	6,800	271.21	-	-	
14-Aug-18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,650	276.25	-	-	50	272.60	-	-	20	273.30	-	-	1,720	276.11	-	-	1,720	276.11	-	-
Total	696,888	139.31	352,296	169.86	911,688	160.92	93,130	222.10	724,290	105.13	39,338	225.67	405,696	183.24	64,536	214.42	359,200	180.54	56,083	222.54	911,867	201.81	-	-	137,276	208.50	-	-	65,129	228.40	-	-	3,612,034	156.58	605,383	191.16				

Handwritten mark

ফোন (পিএবিএক্স) : +৮৮-০২-৫৫০০৭১৩১-২, ফ্যাক্স : +৮৮-০২-৫৫০০৭১৩৬, ই-মেইল : secibd@bdmail.net, ওয়েব : www.sec.gov.bd

b) Combined effects-LEGACYFOOT at DSE (public market) by Mr. Md. Azimul Islam and associates:

Opening balance: 0 shares

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-Public market)	Mkt price (DSE-Public market)	Market price changed by	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	15 (1/12)	16 (4/12)	17 (15+16)
2-Jul-18	141,290	82.66	11,679,282	-	-	-	-	-	141,290	82.66	11,679,282	540,038	79.82	0.00%	26.16%	0.00%	26.16%
3-Jul-18	1,700	89.06	151,400	-	-	-	-	-	142,990	82.74	11,830,682	1,934,996	90.45	13.31%	0.09%	0.00%	0.09%
4-Jul-18	610,000	98.98	60,378,079	-	-	-	-	-	752,990	95.90	72,208,761	1,967,708	98.74	9.16%	31.00%	0.00%	31.00%
9-Jul-18	600,000	132.50	79,498,258	-	-	-	-	-	1,352,990	112.13	151,707,019	2,400,354	132.30	9.80%	25.00%	0.00%	25.00%
11-Jul-18	176,300	160.10	28,226,464	288,580	160.20	46,230,516	117.66	33,953,798	1,240,710	117.66	145,979,684	1,595,286	159.68	9.69%	11.05%	18.09%	29.14%
12-Jul-18	272,458	151.17	41,186,145	-	-	-	-	-	1,513,168	123.69	187,165,830	1,519,404	151.27	-5.27%	17.93%	0.00%	17.93%
15-Jul-18	130,000	167.46	21,769,177	-	-	-	-	-	1,643,168	127.15	208,935,006	539,183	163.00	0.00%	24.11%	0.00%	24.11%
16-Jul-18	438,594	177.58	77,886,338	-	-	-	-	-	2,081,762	137.78	286,821,344	1,373,050	178.14	9.29%	31.94%	0.00%	31.94%
17-Jul-18	293,035	177.95	52,146,511	-	-	-	-	-	2,374,797	142.74	338,967,855	843,974	177.68	-0.26%	34.72%	0.00%	34.72%
18-Jul-18	132,802	194.94	25,888,110	-	-	-	-	-	2,507,599	145.50	364,855,965	916,063	190.79	7.38%	14.50%	0.00%	14.50%
19-Jul-18	564,093	196.40	110,789,173	-	-	-	-	-	3,071,692	154.85	475,645,138	1,144,625	194.07	1.72%	49.28%	0.00%	49.28%
22-Jul-18	146,400	204.05	29,872,451	-	-	-	-	-	3,218,092	157.09	505,517,590	701,403	202.40	0.00%	20.87%	0.00%	20.87%
23-Jul-18	13,000	212.68	2,764,812	11,121	214.35	2,383,784	157.31	1,749,442	3,219,971	157.31	506,532,959	454,499	211.40	4.45%	2.86%	2.45%	5.31%
24-Jul-18	-	-	-	34,801	214.04	7,448,779	157.31	5,474,538	3,185,170	157.31	501,058,421	430,053	211.34	-0.03%	0.00%	8.09%	8.09%
25-Jul-18	2,000	192.00	384,000	18,614	215.18	4,005,336	157.33	2,928,570	3,168,556	157.33	498,513,852	538,920	205.13	-2.94%	0.37%	3.45%	3.83%
29-Jul-18	5,000	188.20	941,000	-	-	-	-	-	3,173,556	157.38	499,454,852	249,783	192.50	0.00%	2.00%	0.00%	2.00%
31-Jul-18	-	-	-	113,981	220.45	25,126,893	157.38	17,938,352	3,059,575	157.38	481,516,500	667,168	221.00	2.42%	0.00%	17.08%	17.08%
1-Aug-18	2,000	214.47	428,933	67,894	213.94	14,525,355	157.42	10,687,703	2,993,681	157.42	471,257,730	389,201	212.82	-3.70%	0.51%	17.44%	17.96%
2-Aug-18	16,000	226.11	3,617,680	66,392	227.09	15,076,902	157.78	10,475,505	2,943,289	157.78	464,399,905	663,795	226.33	6.35%	2.41%	10.00%	12.41%
5-Aug-18	1,700	230.55	391,940	4,000	231.55	926,200	157.82	631,299	2,940,989	157.82	464,160,547	423,375	226.94	0.00%	0.40%	0.94%	1.35%
6-Aug-18	3,900	213.32	831,962	-	-	-	-	-	2,944,889	157.90	464,992,508	521,152	213.62	-5.87%	0.75%	0.00%	0.75%
9-Aug-18	22,288	264.48	5,894,700	-	-	-	-	-	2,967,177	158.70	470,887,208	567,698	254.93	4.79%	3.93%	0.00%	3.93%
12-Aug-18	30,954	275.07	8,514,629	-	-	-	-	-	2,998,131	159.90	479,401,837	579,849	269.23	0.00%	5.34%	0.00%	5.34%
13-Aug-18	6,800	271.21	1,844,260	-	-	-	-	-	3,004,931	160.15	481,246,097	344,516	271.29	0.77%	1.97%	0.00%	1.97%
14-Aug-18	1,720	276.11	474,903	-	-	-	-	-	3,006,651	160.22	481,721,000	380,028	275.33	1.49%	0.45%	0.00%	0.45%
Total	3,612,034	156.58	565,560,206	605,383	191.16	115,723,765	138.49	83,839,206	3,006,651	160.22	481,721,000	21,686,121	169.16	111.91%	16.66%	2.79%	19.45%



সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন
বাংলাকা, ঢাকা-১২০৭, বাংলাদেশ।



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

c) Gain/loss by Mr. Md. Azimul Islam and associates from the trading of LEGACYFOOT at DSE (Public + Block)*:

Buy			Sale			Cost of shares sold		Stock position		
Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount
3,612,034	156.58	565,560,206	1,339,384	193.79	259,558,597	144.99	194,203,215	2,272,650	163.40	371,356,991

Realized capital gain/(loss) per unit	48.80
Realized capital gain/(loss) %	33.65%
Realized capital gain (loss) Tk.	65,355,382
Closing price at DSE- 14-Aug-2018	271.10
Unrealized gain (loss) per unit	107.70
Unrealized gain/(loss) %	65.91%
Unrealized gain (loss) Tk.	244,758,424

Findings: It is observed that Md. Azimul Islam and associates effected manipulative transactions. They effected a series of transactions through the aforesaid 8 (eight) BO accounts in the shares of LEGACYFOOT creating the appearance of active trading therein.

Contraventions: It appears that Azimul Islam and associates 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 LEGACYFOOT creating the appearance of active trading therein.

d) Acquiring substantial number of shares by Mr. Md. Azimul Islam and associates without compliance:

Legacy Footwear Limited has 1,13,73,896 number of shares outstanding. Daily share balance of LEGACYFOOT by Mr. Md. Azimul Islam and associates are as follows:

Date	Buy	Sale	Balance
Opening	-	-	-
2-Jul-18	141,290	-	141,290
3-Jul-18	1,700	-	142,990
4-Jul-18	610,000	-	752,990
5-Jul-18	-	131,000	621,990
9-Jul-18	600,000	-	1,221,990
11-Jul-18	176,300	288,580	1,109,710
12-Jul-18	272,458	-	1,382,168
15-Jul-18	130,000	-	1,512,168
16-Jul-18	438,594	-	1,950,762
17-Jul-18	293,035	-	2,243,797
18-Jul-18	132,802	-	2,376,599



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

Date	Buy	Sale	Balance
19-Jul-18	564,093	-	2,940,692
22-Jul-18	146,400	-	3,087,092
23-Jul-18	13,000	11,121	3,088,971
24-Jul-18	-	334,801	2,754,170
25-Jul-18	2,000	18,614	2,737,556
29-Jul-18	5,000	-	2,742,556
30-Jul-18	-	117,500	2,625,056
31-Jul-18	-	113,981	2,511,075
1-Aug-18	2,000	67,894	2,445,181
2-Aug-18	16,000	66,392	2,394,789
5-Aug-18	1,700	4,000	2,392,489
6-Aug-18	3,900	-	2,396,389
8-Aug-18	-	185,501	2,210,888
9-Aug-18	22,288	-	2,233,176
12-Aug-18	30,954	-	2,264,130
13-Aug-18	6,800	-	2,270,930
14-Aug-18	1,720	-	2,272,650
Total	3,612,034	1,339,384	2,272,650

Aggregate holdings of LEGACYFOOT shares on July 5, 2018 was 6,21,990. They bought 6,00,000 shares on July 9, 2018 raising their shareholdings to 12,21,990 which was above 10% of the outstanding shares of LEGACYFOOT.

Being joint shareholders of more than 10% shares, they continue to buy the said shares up to August 14, 2018.

Findings:

It is found that Mr. Md. Azimul Islam and associates bought shares of LEGACYFOOT without following বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ারঅর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

Contravention:

Through the aforesaid activities, it appears that Mr. Md. Azimul Islam and associates violated বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ারঅর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by jointly acquiring more than 10% shares of LEGACYFOOT without following the above mentioned law.



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

Trade among related accounts:

The enquiry committee has also found some trades among different BO accounts of Mr. Md. Azimul Islam and associates. Details are as follows:

BO ID		1	2	3
		1203040000098342	1202140032837911	1202140000080314
1	1203000064984433	27,338	-	-
2	1203000064875619	-	-	1,000
3	1203000000099130	-	505	-

Findings: It appears from the above table that Mr. Md. Azimul Islam and associates directly or indirectly conducted transactions in shares of LEGACYFOOT which involves no changes in beneficial ownership.

Contraventions: It appears that Mr. Md. Azimul Islam and associates have violated section 17 (e) (iii) of the Securities and Exchange Ordinance, 1969 by directly or indirectly effecting transactions in the shares of LEGACYFOOT which involves no changes in its beneficial ownership.

- f) It is found that as on July 9, 2018 their joint shareholdings was 12,21,990 which was more than 10% of the outstanding shares of LEGACYFOOT. They have made gain (directly or indirectly) of LEGACYFOOT shares by the purchase and sale within a period of less than six months.

Findings: It is observed that being the beneficial owner of not less than ten percent of shares of LEGACYFOOT, Md. Azimul Islam and associates made gain of Tk.6,53,55,382 (Taka six crore fifty three lac fifty five thousand three hundred eighty two) by the purchase and sale within a period of less than six months.

Next course of actions: As per Section-14(1) and Section-14(2) of Securities and Exchange Commission 1969, Md. Azimul Islam and associates shall tender the gain of Tk.6,53,55,382 (Taka six crore fifty three lac fifty five thousand three hundred eighty two) to the issuer company within a period of six months after its accrual or the issuer shall recover the aforesaid gain within a period of six months after its accrual.

যেহেতু, জনাব মো: আজিমুল ইসলাম অ্যান্ড এসোসিয়েটস (বিওআইডি : ১২০৩৪০০০০০০৯৮৩৪২, লুৎফুন নেসা ইসলাম, বিওআইডি : ১২০৩০০০০০০০৯৯১৩০, আলিফ টেক্সটাইলস লি:, বিওআইডি : ১২০৩০০০০৫০২১৬০২৩, নাবিলা ইসলাম, বিওআইডি : ১২০৩০০০০৬৪৮৭৫৬১৯, বাইতুল মামুর, বিওআইডি : ১২০৩০০০০৬৪৯৮৪৪৩৩, মো: আজিজুল ইসলাম, বিওআইডি : ১২০৩০৪০০০০০৮০৩১৪, ১২০২১৪০০৩২৮৩৭৯১১) কে উপরোক্ত ব্যর্থতার জন্য কমিশন কর্তৃক ৩১ অক্টোবর ২০১৮ ইং তারিখের নং বিএসইসি/এনফোর্সমেন্ট/২৬২৮/ ২০১৮/৪৬৩ নম্বর স্মারকমূলে জনাব মো: আজিমুল ইসলাম অ্যান্ড

(Signature)



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।
এসোসিয়েটেডস কে নির্ধারিত তারিখে উপরোক্ত ব্যর্থতার কারণ প্রদর্শনসহ শুনানীতে উপস্থিত হতে বলা হয় এবং মো: আজিমুল
ইসলাম অ্যান্ড এসোসিয়েটস্ উক্ত শুনানীতে ১২ নভেম্বর, ২০১৮ তে উপস্থিত হয়ে তার নিম্ন লিখিত বক্তব্য দাখিল করেন;

“ Dear Sir,

We act on behalf of our above mentioned clients (Hereinafter referred to as “our clients”) who have instructed us to give a written explanation on the above subject matter. Our Explanation is as follows:

- i. That our clients are law abiding citizens of People’s Republic of Bangladesh. They are reputed businessmen in our country and have been doing various kinds of business with name and fame all over Bangladesh and abroad and have been contributing to the national economy by paying taxes regularly.
- ii. That our client on 03.11.18 received a show cause letter vide letter no. SEC/Enforcement/2628/2018/464 dated October 31,2018 stating *inter alia* that

“Azimul Islam and Associates have violated section 17 (e) (v) of Securities and Exchange ordinance, 1969 (XVII of 1969) by directly or indirectly effecting a series of transactions in the shares of BDAUTOCA and LEGACY FOOT creating the appearance of active trading therein. In addition, it has been claimed that Azimul Islam and Associates bought shares of BDAUTOCA and LEGACY FOOT without following 8(১) বাংলাদেশ সিকিউরিটি এক্সচেঞ্জ কমিশন বিএসইসি (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধি , ২০১৮.

- iii. That Our Clients strongly deny the above allegations for the following reasons:

- a) That in the show cause notice it has been alleged that through purchasing Shares of BDAUTOCA and LEGACY FOOT, during the relevant period, Our clients have contravened section 17 (e) (v) of Securities and Exchange Ordinance, 1969 (XVII of 1969) which provides as follows:-

“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,

✓



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

(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 the appearance of active trading therein or of 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."

b) It is humbly submitted that section 17 of Securities and Exchange ordinance, 1969 (XVII of 1969), prohibits fraudulent acts, etc...and the purpose as enunciated in section 17 of Securities and Exchange ordinance, 1969 (XVII of 1969) is a prerequisite for constitutions of a fraudulent act within the meaning of the sections. In the instant case our clients have not made any transaction in the shares of BDAUTOCA and LEGACY FOOT for purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantages. From the alleged transactions, it cannot be constituted that the said transactions in the shares of BDAUTOCA and LEGACY FOOT, our clients made for any purpose of inducing, dissuading, effecting, preventing or in any manner influencing or turning to his advantages.

c) It is humbly submitted that in order to constitute a prohibition act under sub-section (e) of section 17 of Securities and Exchange ordinance, 1969 (XVII of 1969), It requires any act or practice or engagement in a course of business or omission to do any act which operates or would operate as a fraud deceit or manipulation upon any person, in the instant case, we have not made any transection or have not omitted to do anything to do any act which operates or would operate as a fraud deceit or manipulation upon any person.

d) It is humbly submitted that our clients have not taken any action which could or may amount to an action to defraud deceit or manipulate any person rather all actions have been taken upon proper and detail assessment of information available in the market through prospectus price sensitive information and newspaper. Moreover all actions have been taken upon strictly complying with the rules, notifications and directives of the (Bangladesh Securities exchange Commission) BSEC. Accordingly it is submitted that there was no deliberate and/or

[Handwritten signature]



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।
clear contravention of any securities laws on our client's part and as such our clients are no way involving in active trading.

e) The amount of alleged arrange trade shares as referred in the said notice are very negligible as compared to the total trade volume of the alleged period of DSE of the said share.

“As per report submitted by Dhaka Stock Exchange, the total transaction in relation to BDAUTOCA and LEGACY FOOT during the alleged period is 6311958 (Sixty Three Lac Eleven Thosand Nine Hundred Fifty Eight) and 21,68,6,121 (Twenty One Crore Sixty Eight Lac Six Thousand One Hundred Twenty one) whereas our clients have bought only 7,00,943 (Seven lac Nine Hundred Forty Three) and 3612034 (Thirty Six Lac Twelve Thousand Thirty Four) shares which is only 11.11% and 16.66% respectively compare to the total transaction. Considering the said transaction and total market trade volume, it is submitted that this transaction volume is not fair enough to influence or manipulates the market in any manner.”

As a result such nominal transaction did not influence of rising of price of the shares for the purpose of inducing its purchase by others. From the above explanation it shows that my clients activities are not tantamount to non-compliance of securities law that appears deliberate and clear contravention of the section 17 (e) (v) of the Securities and Exchange Ordinance, 1969 (XVII of 1969) attracting penal provision of section 22 of the Securities and Exchange Ordinance, 1969.

f) That it is submitted that our clients bought shares in relation to BDAUTOCA and LEGACY FOOT during the alleged period is 7,00,943 (Seven lac Nine Hundred Forty Three) and 3612034 (Thirty Six Lac Twelve Thousand Thirty Four) shares whereas they sold 441181 and 605383 shares respectively ,which mean that the majority shares are holding by our client and as such nobody has been defraud or induced by our client.

Further it has been claimed that our client is violated বিধি ৪(১) বাংলাদেশ সিকিউরিটি এক্সচেঞ্জ কমিশন বিএসইসি (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধি , ২০১৮. Which states as follows-

এক্সচেঞ্জ হইতে নগদ অর্থের বিনিময়ে উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন বা অধিগ্রহণ।—(১) কোন কোম্পানিতে উল্লেখযোগ্য সংখ্যক এর কম কোন শেয়ারের



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।
ধারক বা ধারকগণ, বা যিনি বা যাহারা কোন শেয়ার ধারণ করেন না এমন ব্যক্তি বা ব্যক্তিবর্গ, এক্সচেঞ্জ 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 এক্সচেঞ্জের মাধ্যমে উক্ত কোম্পানির আরও শেয়ার অর্জন বা অধিগ্রহণের ক্ষেত্রে তাহাকে তফসিল-১ বর্ণিত পদ্ধতিতে একটি ঘোষণা কোম্পানিটি যে এক্সচেঞ্জে তালিকাভুক্ত সেই এক্সচেঞ্জে সংশ্লিষ্ট অধিগ্রহণকারীর স্টক ব্রোকার বা মার্চেন্ট ব্যাংকারের মাধ্যমে দাখিল করিতে হইবে।

From a plain reading it appears that no individual company or shareholders or persons can trade more than 10% shares. None of our client individually has transacted more than 10% shares as such the allegations against our clients are baseless unlawful *malafide*. Therefore, our clients can't be held liable for violating the above mentioned rules.

- iv. In the show cause letter it has been claimed that our client and their family members are associates which is totally false and misleading. Our clients was trading individually and doing business separately. They have no ideas about the other members business. All of our clients are individuals and adults and doing business separately who have no knowledge about another person's business or trading of shares. Under the securities laws there is no restriction on buying or selling shares between known persons. Our Clients are bloodly connected doesn't mean that they are associates. So the allegation against our clients is misleading, unlawful and *malafide*.

In compliance of law Our Clients took investment decisions on particular trading dates to buy shares. The allegation of involvement in series of transaction of shares directly or indirectly in order to create active trading of the said shares through buying and selling in quiet unsupported by the trading Facts and figures and as such denied by our clients.

In the above circumstances we hope and pray that the above explanation would suffice to satisfy you to come to a conclusion that there was no violation on our part of any securities laws as alleged in your Notice and accordingly, we hope and pray that we may be pardoned from any further measures under section 22 of the securities and Exchange ordinance, 1969.

Nevertheless our clients would request your honor to take merciful view if anything wrong doing on our part and also assure you that our clients would be sincere enough to abide by the rules regulation of Stock Exchange in future."



বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন

সিকিউরিটিজ কমিশন ভবন, ই-৬/সি আগারগাঁও, শের-ই-বাংলা নগর প্রশাসনিক এলাকা, ঢাকা-১২০৭, বাংলাদেশ।

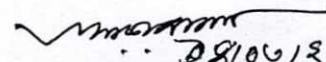
Mr. Md. Azimul Islam and his associates (LUTFUN NESSA ISLAM, NABILA ISLAM, MD. AZIZUL ISLAM, ALIF TEXTILES LTD- Managing Director, Md. Azimul Islam, BAITUL MAMOOR) এর লিখিত বক্তব্য কমিশনের বিচেনায় গ্রহণযোগ্য হয়নি।

যেহেতু, Mr. Md. Azimul Islam and his associates 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 মো: আজিমুল ইসলাম অ্যান্ড এসোসিয়েটস্ কে জরিমানা 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] এ প্রদত্ত ক্ষমতাবলে জনাব মো: আজিমুল ইসলাম অ্যান্ড এসোসিয়েটস (বিওআইডি : ১২০৩৪০০০০০০৯৮৩৪২, লুৎফুন নেসা ইসলাম, বিওআইডি : ১২০৩০০০০০০০৯৯১৩০, আলিফ টেক্সটাইলস লি:, বিওআইডি : ১২০৩০০০০৫০২১৬০২৩, নাবিলা ইসলাম, বিওআইডি : ১২০৩০০০০৬৪৮৭৫৬১৯, বাইতুল মামুর, বিওআইডি : ১২০৩০০০০৬৪৯৮৪৪৩৩, মো: আজিজুল ইসলাম, বিওআইডি : ১২০৩০৪০০০০৮০৩১৪, ১২০২১৪০০৩২৮৩৭৯১১) এর উপর ২ (দুই) কোটি 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,


খোন্দকার কামালউজ্জামান
কমিশনার

বিতরণঃ

জনাব মো: আজিমুল ইসলাম অ্যান্ড এসোসিয়েটস (বিওআইডি : ১২০৩৪০০০০০০৯৮৩৪২)
(লুৎফুন নেসা ইসলাম, বিওআইডি : ১২০৩০০০০০০০৯৯১৩০,
আলিফ টেক্সটাইলস লি:, বিওআইডি : ১২০৩০০০০৫০২১৬০২৩,
নাবিলা ইসলাম, বিওআইডি : ১২০৩০০০০৬৪৮৭৫৬১৯,
বাইতুল মামুর, বিওআইডি : ১২০৩০০০০৬৪৯৮৪৪৩৩
মো: আজিজুল ইসলাম, বিওআইডি : ১২০৩০৪০০০০৮০৩১৪, ১২০২১৪০০৩২৮৩৭৯১১)
কমার্স ব্যাংক সিকিউরিটিজ অ্যান্ড ইনভেস্টমেন্ট লি:
তরঙ্গ কমপ্লেক্স, ৩য় তলা, ১৯, রাজউক এ্যাভিনিউ,
মতিঝিল, ঢাকা-১০০০।