

BANGLADESH SECURITIES AND EXCHANGE COMMISSION

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

নং-বিএসইসি/এনফোর্সমেন্ট/২৬২১/২০১৮/১১

তারিখঃ ০১ 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;

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:

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

Muhammad Ali Mansur and his associates:

SL.	BO ID	Name	Name of the DP	Relationship
1	1203000031636536	MUHAMMAD ALI MANSUR	Commerce Bank Securities And Investment Ltd.	Own account
2	1203000062283464	YEAKUT JAHAN	Commerce Bank Securities And Investment Ltd.	Spouse's account



Phone (PABX): +88-02-55007131-2, Fax: +88-02-55007106, E-mail: seebd@bdmail.net. Web: www.see.gov.bd

i) MONNOSTAF:

a) Individual patterns:

Date 12030003163653535 1203000622834645 MUHAMMAD ALI MANSUR & associate of the property of the prop	Date MUHAMMAD ALI MANSUR Commerce Bank Securities And Investment Ltd. Commerce Bank Securities And Investment L	YEAKUT JAHA e Bank Securities An BR SQ - 27 - 402 - 1,000 2,216.81 2,400.00 100	AN nd Investment Ltd. Q SR 7 1,117.30 2 1,187.10 00 1,261.20	BQ 300 23 27 50 100	BR 2,216.81 2,213.91 2,200.00 2,405.00 2,557.90	\$Q 27 900 1,000 - - - -	SR Corpha St. 1,117.38(s) 1,117.38(s) 1,187.38(s) 1,261.38(d) 1,26
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S-Apr-18	5-Apr-18 -<	- 27 - 402 - 1,000 2,216.81 2,400.00 100	1,117.30 2 1,187.10 00 1,261.20 - - - -	- - 300 23 27 50 100	- - 2,216.81 2,213.91 2,200.00 2,405.00 2,557.90	27 900 1,000 - - - - -	1,117.38 1,187.38 1,261.32 - , E
8-Apr-18	8-Apr-18 498 1,187.10 9-Apr-18 300 2 3 30-May-18 23 2,213.91 31-May-18 27 2,200.00 31-May-18 33 2,407.58 17 2 5-Jun-18 100 2,557.90	- 402 - 1,000 2,216.81 2,400.00 100	2 1,187.10 00 1,261.20 - - - - - -	- 300 23 27 50 100	- 2,216.81 2,213.91 2,200.00 2,405.00 2,557.90	900 1,000	1,187.2 1,261.2 1,261.2 - L-6/
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1-May-18	1-May-18 27 2,200.00			27 50 100	2,200.00 2,405.00 2,557.90	-	:-6/C Agargaon, Sher-
1-May-18	4-Jun-18 33 2,407.58 - - 17 2 5-Jun-18 100 2,557.90 - - - - 6-Jun-18 50 2,685.64 - - - - 7-Jun-18 200 2,820.00 183 2,820.00 - 10-Jun-18 - - 50 2,825.00 - 11-Jun-18 - - 200 2,701.23 - Total 433 2,641.67 931 1,921.30 317 2	2,400.00 - 100	-	50 100	2,405.00 2,557.90	-	Agargaon, Sher-
7-Jun-18 200 2,820.00 183 2,820.00 100 2,770.34 200 2,820.00 283 2,802.5 10-Jun-18 50 2,825.00 217 2,834.57 267 2,832.7 11-Jun-18 200 2,701.23 200 2,701.23	5-Jun-18 100 2,557.90 - - - 6-Jun-18 50 2,685.64 - - - 7-Jun-18 200 2,820.00 183 2,820.00 - 10-Jun-18 - - 50 2,825.00 - 11-Jun-18 - - 200 2,701.23 - Total 433 2,641.67 931 1,921.30 317 2	 - 100	-	100	2,557.90	- 1	rgaon, Sher-
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7-Jun-18 200 2,820.00 183 2,820.00 100 2,770.34 200 2,820.00 283 2,802.5 10-Jun-18 50 2,825.00 217 2,834.57 267 2,832.7 11-Jun-18 200 2,701.23 200 2,701.23	7-Jun-18 200 2,820.00 183 2,820.00 - 10-Jun-18 50 2,825.00 - 11-Jun-18 200 2,701.23 - Total 433 2,641.67 931 1,921.30 317 2	- 100		50	2,685.64		er.
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11-Jun-18 200 2,701.23 200 2,701.23	11-Jun-18 200 2,701.23 - Total 433 2,641.67 931 1,921.30 317 2		2,770.34	200	2,820.00	283	2,802.
	Total 433 2,641.67 931 1,921.30 317 2	- 217	7 2,834.57	-	A 44	267	2,832.7
Total 433 2,641.67 931 1,921.30 317 2,226.64 1,746 1,523.89 750 2,466.25 2,677 1,662.4				-	-	200	2,701.2
Inistrative Area,		2,226.64 1,74	1,523.89	750	2,466.25	2,677	1,662.
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		Buy			Sale		Cost of sh	nares sold		Stock positi	on		Compariso	n with the m	arket	MANGE + BANGE 40
Date	Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount	Mkt trade Qty (DSE- Normal)	Mkt price (DSE- Normal)	Client Buy (%)	Cient	Lient Trade 1%
	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)
29-May-18	300	2,216.81	665,044	-					300	2,216.81	665,044	10,129	2,193.74	2.96%	0.00%	296%
30-May-18	23	2,213.91	50,920	-	-	A Marine			323	2,216.61	715,964	5,215	2,239.26	0.44%	0.00%	Ties Con
31-May-18	27	2,200.00	59,400	-	-			-	350	2,215.33	775,364	5,179	2,210.99	0.52%	0.00%	F. 64-54
4-Jun-18	50	2,405.00	120,250	-				-	400	2,239.04	895,614	2,872	2,429.59	1.74%	0.00%	74%
5-Jun-18	100	2,557.90	255,790	-	-	Will live		-	500	2,302.81	1,151,404	9,454	2,546.53	1.06%	0.00%	1.063
6-Jun-18	50	2,685.64	134,282	1			-	-	550	2,337.61	1,285,686	1,401	2,682.91	3.57%	0.00%	Shab
7-Jun-18	200	2,820.00	564,000	283	2,802.45	793,094	2,466.25	697,948	467	2,466.25	1,151,738	10,884	2,799.99	1.84%	2.60%	
10-Jun-18	-	-		267	2,832.78	756,352	2,466.25	658,488	200	2,466.25	493,250	6,232	2,856.42	0.00%	4.28%	£28%
11-Jun-18			E 1	200	2,701.23	540,247	2,466.25	493,250	-	-		8,092	2,706.94	0.00%	2.47%	
Total	750	2,466.25	1,849,686	750	2,786.26	2,089,693	2,466.25	1,849,686								gaon
Realized g	ain/(loss) per unit	320.01													IES Sher-
Realize	ed gain/(l	oss) %	12.98%													
Realize	d gain (lo	ss) Tk.	240,006												,	AND
	h divide	- 4		1												22

Closing price at DSE- 21-Jun-18 3,452.10

Unrealized gain (loss) by 0.00%

Unrealized gain (loss) Tk.
Findings: It is observed that Muhammad Ali Mansur and his associate effected manipulative transactions. They affected a series of transactions through the aforesaid 2 (two) BO accounts in the shares of MONNOSTAF creating the appearance of active trading therein.

Contraventions: It appears that Muhammad Ali Mansur and his associate 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.

Bangal Administrative contraventions: It appears that Muhammad Ali Mansur and his associate 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.

Bangal Administrative contraventions: It appears that Muhammad Ali Mansur and his associate 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. **EXCHANGE COMMISSION**



ii) LEGACYFOOT:

a) Individual patterns:

			1				2			To	tal	SIL 2
		1203000	031636536		S. George	1203000	062283464					18 1555
Date	N	IUHAMMAI	D ALI MANSU	R		YEAKU	T JAHAN		MUHAMN	AD ALI M	IANSUR & a	ssociates
	Commerce	Bank Securi	ities And Inve	stment Ltd.	Commerce	Bank Securi	ities And Inve	stment Ltd.	1000			Se
	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	sq	SRE.
10-May-18	10,500	58.68	- 1	111-111	7,650	60.26	-	-	18,150	59.35	-	ies C
13-May-18	3,000	62.90	- 190		-	E [1/2] = 1	-	_	3,000	62.90	- 18 II-	omn
14-May-18		-	1,000	60.92					-		1,000	60.9
15-May-18	-	-	-	-	2,000	62.50		-	2,000	62.50	-	n Bh
16-May-18	-	-			11 1000 1210	- mile	3,000	65.66	-	-	3,000	65.6
17-May-18	16,600	65.00	-		4,000	65.54	-	-	20,600	65.11		E-6
20-May-18	2,000	67.61	7,000	71.00	* 1	-	-	-	2,000	67.61	7,000	71.00
21-May-18	10,000	73.69	1,500	72.50	•	-			10,000	73.69	1,500	72.5
22-May-18	18,000	75.59	22,600	77.12	11,000	77.91	1,467	77.00	29,000	76.47	24,067	77.1€
23-May-18		2= 11.5	10,000	75.00	-	-	-		-	4	10,000	75.0
24-May-18	7,500	82.27		s all	-	-	·		7,500	82.27	-	e-Bangla
27-May-18	31,200	84.06	-	-	1,500	83.80	l la	-	32,700	84.05	-	ngla -
28-May-18	-	-	25,500	90.18	1 4 - 1		4,633	90.46	-	<u> </u>	30,133	90.2
29-May-18	-	- 4	-	-	-		7-51	-	-	-		ar Ad
30-May-18			200	84.60		- 1	-	-	-	-	200	84.6
31-May-18	9,000	87.98	10,000	92.52	9,000	91.25	-	- 4	18,000	89.62	10,000	92.5
4-Jun-18			30,000	90.21	- 1		Jale III	-			30,000	90.2
6-Jun-18		-					26,050	84.85		-	26,050	84.8
7-Jun-18	10,000	89.35		-	15,000	89.19		47	25,000	89.26		Dhak '
12-Jun-18			10,000	88.41			10,550	86.88		-	20,550	87.6
18-Jun-18							2,000	92.20		-	2,000	92.20
19-Jun-18		10- 18			Turi-Ti	-	2,450	95.28	-		2,450	95.2
3-Jul-18	2,000	91.00						-	2,000	91.00		ades

			1				2			To	otal	طالعاللها	1
		12030000	31636536			1203000	062283464					Alfalles Mark	1
Date	M	UHAMMAI	ALI MANSUI	R		YEAKU	T JAHAN		MUHAMM	AD ALI N	IANSUR & a	ssociates	
	Commerce E	Bank Securi	ties And Inve	stment Ltd.	Commerce	Bank Securi	ities And Inve	stment Ltd.				1 3 TH	L
<u>. Maj. 4</u>	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	sQ	SR	H
4-Jul-18	25,000	98.04	-		10,000	99.42			35,000	98.44	6-2-	- 0	
8-Jul-18		-	10,000	120.50						-	10,000	120.50	5
9-Jul-18		- 1	17,000	132.34		-	10,000	132.50	-	3	27,000	132.40	1
Total	144,800	80.63	144,800	92.86	60,150	82.86	60,150	93.08	204,950	81.28	204,950	92.92	F

-	4-Jui-16	25	,000	98.04			10,	,000	99.42		-	33,	000	98.44		- 0
	8-Jul-18	<u>kan</u>	-	-	10,000	120.5	0	-	-		-			-	10,000	120.5
	9-Jul-18	A PA	- 6.5%	-	17,000	132.3	4		-	10,000	132.5	50	-	-	27,000	132.4
	Total	144	,800	30.63	144,800	92.86	60,	150	82.86	60,150	93.0	8 204	,950	31.28	204,950	92.92
	b) Co		effects:													mission Hn
		Buy			Sale		Cost of	shares sold		Stock posit	ion			son with	he market	bnaoan.
Date	Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount	Mkt trade Qty (DSE- Normal)	Mkt price (DSE- Norma	1 (%	sale	Client
, ×	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 (1/1		(%) Againgao 16 (14+15)
10-May-18	18,150	59.35	1,077,135	-			- 1		18,150	59.35	1,077,135	888,230	59.83	2.04	% 0.00%	2.04%
13-May-18	3,000	62.90	188,700		- L.			W. CP	21,150	59.85	1,265,835	1,278,532	62.40	0.23	% 0.00%	0.23%
14-May-18				1,000	60.92	60,916	59.85	59,850	20,150	59.85	1,205,985	449,138	60.17	0.00	% 0.22%	0.22%
15-May-18	2,000	62.50	125,000	T AUT					22,150	60.09	1,330,985	1,713,575	63.16	0.12	% 0.00%	0.12%
16-May-18	-		-	3,000	65.66	196,970	60.09	180,269	19,150	60.09	1,150,716	1,213,006	65.80	0.00	% 0.25%	0.25%
17-May-18	20,600	65.11	1,341,167			rapa-mign	1812- B		39,750	62.69	2,491,882	917,297	64.96	2.25	% 0.00%	2.25%
20-May-18	2,000	67.61	135,211	7,000	71.00	497,000	62.92	440,471	34,750	62.92	2,186,623	1,533,682	69.12	0.13	% 0.46%	0.59%
21-May-18	10,000	73.69	736,942	1,500	72.50	108,750	65.33	97,997	43,250	65.33	2,825,568	1,409,460	72.90	0.71	% 0.11%	0.82%
22-May-18	29,000	76.47	2,217,669	24,067	77.11	1,855,836	69.80	1,679,939	48,183	69.80	3,363,298	1,638,986	77.06	1.77	% 1.47%	3.24%
23-May-18	man I			10,000	75.00	749,960	69.80	698,026	38,183	69.80	2,665,272	2,112,113	78.93	0.00	% 0.47%	0.47%
24-May-18	7,500	82.27	617,000	-		-	-		45,683	71.85	3,282,272	1,150,300	83.47	0.65	% 0.00%	0.65%
27-May-18	32,700	84.05	2,748,276		l'in-mi				78,383	76.94	6,030,548	1,506,363	84.46	2.17	% 0.00%	2.17%
28-May-18			-	30,133	90.22	2,718,640	76.94	2,318,341	48,250	76.94	3,712,207	1,441,459	87.62	0.00	% 2.09%	2.09%

Unrealized gain/(loss) %

Unrealized gain (loss) Tk.

		Buy			Sale		Cost of	shares sold		Stock posit	on		Comparison	with the	market
Date	Qty	Price	Amount	Qty	Price	Amount	Price (W.Avg)	Amount	Qty	Price (W.Avg)	Amount	Mkt trade Qty (DSE- Normal)	Mkt price (DSE- Normal)	Client Buy (%)	Client sale (%)
	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)
30-May-18			-	200	84.60	16,920	76.94	15,387	48,050	76.94	3,696,820	840,722	86.59	0.00%	0.02%
31-May-18	18,000	89.62	1,613,080	10,000	92.52	925,192	80.39	803,921	56,050	80.39	4,505,979	1,606,643	90.14	1.12%	0.62%
4-Jun-18		•	-	30,000	90.21	2,706,280	80.39	2,411,764	26,050	80.39	2,094,215	1,173,740	89.67	0.00%	2.56%
6-Jun-18	-	-		26,050	84.85	2,210,235	80.39	2,094,215	-		-	829,374	85.54	0.00%	3.14%
7-Jun-18	25,000	89.26	2,231,400	-	- 8	-			25,000	89.26	2,231,400	1,580,673	91.44	1.58%	0.00%
12-Jun-18	-		-	20,550	87.62	1,800,637	89.26	1,834,211	4,450	89.26	397,189	851,237	88.03	0.00%	2.41%
18-Jun-18		1		2,000	92.20	184,400	89.26	178,512	2,450	89.26	218,677	1,269,590	90.94	0.00%	0.16%
19-Jun-18				2,450	95.28	233,430	89.26	218,677	-	-		1,566,829	92.81	0.00%	0.16%
3-Jul-18	2,000	91.00	182,000	-	-	-			2,000	91.00	182,000	1,934,996	90.45	0.10%	0.00%
4-Jul-18	35,000	98.44	3,445,233	-	-	•	7/2/	Jak 1	37,000	98.03	3,627,233	1,967,708	98.74	1.78%	0.00%
8-Jul-18	-	- 0-711	-	10,000	120.50	1,205,000	98.03	980,333	27,000	98.03	2,646,900	251,945	120.50	0.00%	3.97%
9-Jul-18	3-11	- 1		27,000	132.40	3,574,800	98.03	2,646,900	-		-	2,400,354	132.30	0.00%	1.12%
Total	204,950	81.28	16,658,812	204,950	92.92	19,044,966	81.28	16,658,812	-	-	-				
Realized	gain/(loss) p	er unit	11.64	frage.											
Realiz	ed gain/(loss	s) %	14.32%												
Realiz	ed gain (loss)	Tk.	2,386,154												
C	ash dividend		- 1												
Closing price	e at DSE-	10-Jul-18	145.70												
Unrealize	d gain (loss)	per unit	4 - 4												
		1													

(14+15)

0.02%

1.74%

2.56%

3.14%

1.58%

2.41%

0.16%

0.16%

0.10%

1.78%

3.97%

lere-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

BANGLADESH SECURITIES AND EXCHANGE COMMISSION



0.00%

Findings: It is observed that Muhammad Ali Mansur and his associate effected manipulative transactions. They affected a series of transactions through the aforesaid 2 (two) BO accounts in the shares of LEGACYFOOT creating the appearance of active trading therein.

Contraventions: It appears that Muhammad Ali Mansur and his associate 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

iii) BDAUTOCA:

a) Individual patterns:

		1					2		Total Commission				
		120300003	31636536			12030000	062283464						
Date	ı	MUHAMMAD	ALI MANSU	R		YEAKU	T JAHAN	MUHAMMAD ALI MANSUR & associate					
	Commerce	Bank Securiti	ies And Inve	stment Ltd.	Commerce	e Bank Securi	ties And Inve	estment Ltd.	naba				
	BQ	BR	SQ	SR	BQ	BR	SQ	SR	BQ	BR	sq	, SR	
4-Jun-18	10,000	129.23	-		-	-	-	-	10,000	129.23	-	6/Ċ /	
7-Jun-18	-	-	8,000	169.40	-	-	-	-	-	-	8,000	169.	
10-Jun-18	11,000	178.12	-		3,190	186.52	-	-	14,190	180.01	-	169.	
11-Jun-18	2,000	183.75	2,000	175.32	-	_	-	-	2,000	183.75	2,000	155.	
12-Jun-18	AT LIGHT	-	2,000	180.00		H-in	-		-		2,000	180.	
18-Jun-18			7,000	187.56	-	-	3,190	185.98	-	-	10,190	187.	
19-Jun-18	1,000	211.75	4,000	218.20		-	-	-	1,000	211.75	4,000	238.	
Total	24,000	159.62	23,000	184.85	3,190	186.52	3,190	185.98	27,190	162.78	26,190	184.	
				M								ministrative Area,	
												dministrative Area, Dhaka-1207, Bangladesh.	





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

Findings: It is observed that Muhammad Ali Mansur and his associate effected manipulative transactions. They effected a series of transactions through the aforesaid 2 (two) BO accounts in the shares of BDAUTOCA creating the appearance of active trading therein.

Contraventions: It appears that Muhammad Ali Mansur and his associate 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.

যেহেতু, জনাব মোঃ আলী মনসুর (বিওআইডি: ১২০৩০০০০৩১৬৩৬৫৩৬)-কে উপরোক্ত ব্যর্থতার জন্য কমিশন কর্তৃক ২৪ অক্টোবর ২০১৮ ইং তারিখের নং বিএসইসি/এনফোর্সমেন্ট/২৬২১/২০১৮/৪৪০ নম্বর স্মারকমূলে জনাব মোঃ আলী মনসুর-কে নির্ধারিত তারিখে উপরোক্ত ব্যর্থতার কারণ প্রদর্শনসহ শুনানীতে উপস্থিত হতে বলা হয় এবং জনাব মোঃ আলী মনসুর উক্ত শুনানীতে ১২ নভেম্ববর, ২০১৮ তে উপস্থিত হয়ে তার নিম্ন লিখিত বক্তব্য দাখিল করেন;

"Please refer to your letter no SEC/Enforcement/2628/2018/440 dated October 24, 2018 on the captioned subject.

That in the above referred show cause notice, me and my spouse have been accused of having violation of Section 17 (e)(v) of the Securities and Exchange Ordinance, 1969, based on the findings of an enquiry on the recent unusual and suspicious transactions in different securities including Monno Jute Staffler Ltd., Legacy footwear Ltd. and BD Autocars Ltd., and Queensouth Textiles Ltd.

In the above referred letter, BSEC has provided trade description of share transaction of Monno Jute Stafflers Industries Ltd. from 05/04/2018 to 11/06/2018 and Legacy footwear Ltd. from 10/05/2018 to 09/07/2018, BD Autocars Ltd. from 04/06/2018 to 19/06/2018. Therefore, we (BO ID: 1203000031636536 and 1203000062283464) have been accused of being directly involved in a series of transaction in the shares of the aforementioned companies.

Therefore, I would like to afford the following response to the above mentioned findings.

Now, I would like to draw your kind attention to the investment position in capital market:

Explanation of alleged manipulative transactions:

My buy volume vis-a-vis DSE total volume in the reported stocks are as under:

Particulars	Monnostaff	Legacyfoot	BDAUTOCA
Total buy volume	750	204,950	27,190
Total transaction in DSE	499,323	45,113,407	3,424,556
% of DSE	0.15%	0.45%	0.79%

As you glance through, you find that our total traded volume was very insignificant to the total traded volume of the reported stocks at DSE. Our highest traded percentage of <u>0.15%</u> at Monnostaff, <u>0.45%</u> Legacy footwear ltd. and <u>0.79%</u> was not at all significant commensurate with my investment size. On the other hand, we have literally traded very trivial quantity in others stocks which we believe did neither abuse the price nor the total volume of the stocks under investigation.

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BANGLADESH SECURITIES AND EXCHANGE COMMISSION

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

We also solemnly declare you that <u>we did not</u> buy or sell shares of MONNOSTAF, LEGACYFOOT, BDAUTOCA 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.

To the best of our knowledge, we 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.

Again, we did not make any to offense under section 17(e) (v). We simply traded based market movement and our own perception.

We request you to kindly consider our matter with sympathy."

জনাব মোঃ আলী মনসুর (বিওআইডি : ১২০৩০০০০৩১৬৩৬৫৩৬) এর লিখিত বক্তব্য কমিশনের বিচেনায় গ্রহণযোগ্য হয়নি।

যেহেতু, জনাব মোঃ আলী মনসুর এর লিখিত বক্তব্য কমিশনের বিবেচনায় গ্রহণযোগ্য হয়নি, যা সিকিউরিটিজ আইন পরিপালনে ব্যর্থতা বিধায় section 22 of the Securities and Exchange Ordinance, 1969 অনুযায়ী শান্তিযোগ্য 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 আলী মনসুর 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 দারা সংশোধিত] এ প্রদন্ত ক্ষমতাবলে জনাব মোঃ আলী মনসুর (বিওআইডি: ১২০৩০০০০৩১৬৩৬৫৩৬) এর উপর ১০ (দশ) লক্ষ টাকা জরিমানা ধার্য্য 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,

02/08/2027

খোন্দকার কামালউজ্জামান কমিশনার

বিতরণঃ

জনাব মোঃ আলী মনসুর (বিওআইডি : ১২০৩০০০০৩১৬৩৬৫৩৬) কমার্স ব্যাংক সিকিউরিটিজ অ্যান্ড ইনভেস্টমেন্ট লি: তরঙ্গ কমপ্লেক্স, ৩য় তলা, ১৯ রাজউক এ্যাভিনিউ, মতিঝিল, ঢাকা-১০০০।

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