



BANGLADESH SECURITIES AND EXCHANGE COMMISSION

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

বিএসইসি/এনফোর্সমেন্ট/ ৩০২২/২০২১/৫৬২

তারিখ: আগস্ট ৭, ২০২৩

Mohammad Abdul Hai
BO ID # 1201950045200407
EBL Securities Limited
Jiban Bima Bhaban (1st Floor), 10, Dilkusha C/A
Dhaka

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/ ৩০২২/২০২১/৫৬১ তারিখ: ৬ আগস্ট, ২০২৩ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

মুহাম্মদ সাদেকুর রহমান ডুইয়া
সহকারী পরিচালক (এনফোর্সমেন্ট)
ই-মেইল- msrahman@sec.gov.bd

অবগতির জন্য অনুলিপি:

- ১। নির্বাহী পরিচালক, এমএসআই, বিএসইসি,
- ২। নির্বাহী পরিচালক, এমআইএস, বিএসইসি,
- ৩। চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।



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নং- বিএসইসি/এনফোর্সমেন্ট/৩০২২/২০২১/ ৫৬৩

তারিখঃ ৬ আগস্ট, ২০২৩

আদেশ

যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক “কমিশন” অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, Section 21 of the Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) -এ প্রদত্ত ক্ষমতাবলে বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন- এর অনুসন্ধানকারী দল JMI Syringes and Medical Devices Ltd. (JMISMDL) এর শেয়ার লেনদেনের অনুসন্ধান (Enquiry) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে; অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Non-Compliance of Mr. Mohammad Abdul Hai in connection with share trading of JMISMDL

Mohammad Abdul Hai conducted transaction in buying JMISMDL through his multiple BO accounts (1201950045200407, 1201910045045163, 1203980042907791, 1204090017679511, 1201910043271369) along with Prime Exim Ltd (1201910059820586) in which Mohammad Abdul Hai is the beneficiary.

Mr. Mohammad Abdul Hai (1201950045200407) conducted series of transaction in buying JMISMDL on December 14, 2020 (Quantity: 20,000), December 20, 2020 (Quantity: 50,000), December 21, 2020 (Quantity: 50,000), December 22, 2020 (Quantity: 418), December 23, 2020 (Quantity: 1,831), December 24, 2020 (Quantity: 10,761), December 27, 2020 (Quantity: 2,157), December 28, 2020 (Quantity: 1,149), December 30, 2020 (Quantity: 22,196), January 03, 2021 (Quantity: 19,440), January 06, 2021 (Quantity: 20,577), January 07, 2021 (Quantity: 4,000), January 14, 2021 (Quantity: 10,000). From December 14, 2020 to January 14, 2021, he bought a total of 2,08,529 shares of JMISMDL.

Mr. Mohammad Abdul Hai (1201910045045163) conducted series of transaction in buying JMISMDL on December 14, 2020 (Quantity: 5,000), December 21, 2020 (Quantity: 2,500), December 22, 2020 (Quantity: 2,800), December 24, 2020 (Quantity: 2,552), December 27, 2020 (Quantity: 1,200). From December 14, 2020 to December 27, 2020, he bought a total of 14,052 shares of JMISMDL.

Mr. Mohammad Abdul Hai (1203980042907791) conducted series of transaction in buying JMISMDL on December 21, 2020 (Quantity: 3,250), December 23, 2020 (Quantity: 6,177), December 24, 2020 (Quantity: 4,000). From December 21, 2020 to December 24, 2020, he bought a total of 13,427 shares of JMISMDL.

Mr. Mohammad Abdul Hai (1204090017679511) conducted transaction in buying JMISMDL on December 14, 2020 (Quantity: 5,100), December 21, 2020 (Quantity: 5,000). From December 14, 2020 to December 21, 2020, he bought a total of 10,100 shares of JMISMDL.



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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্টে বিভাগ কর্তৃক ডিসেম্বর ১৩, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩০২২/২০২১/১৬৪৬ স্মারকমূলে Mr. Mohammad Abdul Hai কে ডিসেম্বর ২২, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিতি হতে বলা হয়। শুনানীতে উপস্থিত হয়ে Mr. Mohammad Abdul Hai নিম্নলিখিত বক্তব্য দাখিল করেন:

".....I would like to humbly inform you that as an investor, I have limitations to know all the rules and regulations as there are so many rules and regulations for capital market. As a part of investment, I was engaged in regular trading of the instrument JMI syringes and Medical Devices Limited (JMISMDL). I am extremely sorry for any mistake that took place during the execution of the trade which was completely beyond my unawareness regarding capital market related rules and regulations.

Therefore, I am sincerely apologized for that I could not carefully observed the day-wise total trade volume and percentage at the trade time.....I express my deep regrets and sincere apologies again and earnestly request you to pardon me considering the unintended mistake....."

যেহেতু, Mr. Mohammad Abdul Hai -এর উপর্যুক্ত বক্তব্য থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক, সেহেতু এক্ষেত্রে Mr. Mohammad Abdul Hai -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Mohammad Abdul Hai - উপর্যুক্ত কর্মকান্ডের ফলে Section 17(e)(v) of Securities and Exchange Ordinance, 1969 লংঘন করেছেন;

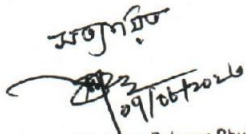
যেহেতু, Mr. Mohammad Abdul Hai -এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

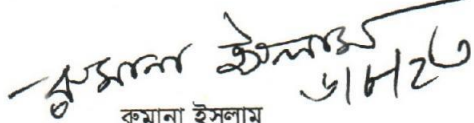
যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mr. Mohammad Abdul Hai -কে অর্থদণ্ডে দণ্ডিত করা প্রয়োজন ও সমীচীন;

অতএব, সেহেতু, কমিশন উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর Section 22 এ প্রদত্ত ক্ষমতাবলে-

- Mr. Mohammad Abdul Hai -কে ২০.০০ (বিশ) লক্ষ টাকা অর্থদণ্ডে দণ্ডিত করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


Muhammad Sadequr Rahman Bhuiyan
Assistant Director
Bangladesh Securities and Exchange Commission


রুমানা ইসলাম
কমিশনার।

বিতরণ:

১। Mr. Mohammad Abdul Hai
BO ID# 1201950045200407
EBL Securities Ltd.
Jiban bima Bhaban (1st Floor), 10 Dilkusha C/A, Dhaka-1000



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তারিখ: আগস্ট ০৮, ২০২৩

জনাব মোহাম্মদ আবদুল হাই

(Client Code: 41777, BOID: 1201950042747609 &

Client Code: 41888, BOID: 1201950045200407)

EBL Securities Limited

জীবন বীমা ভবন (২য় তলা), ১০, দিলকুশা বা/এ, ঢাকা-১০০০

বিষয়: আদেশ।

কমিশনের আগস্ট ০৮, ২০২৩ ইং তারিখের আদেশ নং নং-বিএসইসি/এনফোর্সমেন্ট/৩২৮৯/২০২২/৫৭০ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে

মাহমুদা শিরীন
০৮-০৮-২৬

মাহমুদা শিরীন

যুগ্ম-পরিচালক

বিতরণঃ

- ১। চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি
- ২। নির্বাহী পরিচালক, সারভেইল্যান্স, বিএসইসি
- ৩। নির্বাহী পরিচালক, এমআইএস, বিএসইসি



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নং-বিএসইসি/এনফোর্সমেন্ট/৩২৮৯/২০২২/৫৭০

তারিখঃ আগস্ট ০৮, ২০২৩

আদেশ

যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, ঢাকা স্টক এক্সচেঞ্জ লিমিটেড Regulation 16(3)(c)(ii) and (d)(v) of the Dhaka Stock Exchange (Board and Administration) Regulations, 2013 দ্বারা প্রদত্ত ক্ষমতাবলে ০৫-০৪-২০২১ থেকে ২৭-০৫-২১ পর্যন্ত সময়কালে Maksons Spinning Mills Limited-এর শেয়ার লেনদেন সংক্রান্ত investigation কার্যক্রম পরিচালনা করেছে এবং এ সংক্রান্ত একটি প্রতিবেদন জানুয়ারী ২০, ২০২২ তারিখের পত্রের মাধ্যমে কমিশনে দাখিল করেছে। অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

A) Trade pattern of Mohammad Abdul Hai:

It is observed that Mohammad Abdul Hai traded significant number of shares of 'MAKSONSPIN' for the period from 05.04.2021 to 27.05.2021. The details of the accounts are as follows:

BO ID	Client Code	Client Name	Name of TREC Holder
1201950042747609	41777	MOHAMMAD ABDUL HAI	EBL Securities Limited
1201950045200407	41888	MOHAMMAD ABDUL HAI	EBL Securities Limited
1205590042907791	S1000	MOHAMMAD ABDUL HAI	UCB Stock Brokerage Limited



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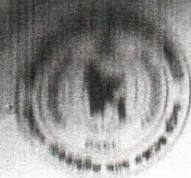
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The trade details of the accounts are given below:

i) Individual Trade pattern of Mohammad Abdul Hai (Public market):

Date	Code #41777				Code #41888				Code #S1000				Total					
	BO ID #1201950042747609				BO ID #1201950045200407				BO ID #1205590042907791									
	MOHAMMAD ABDUL HAI				MOHAMMAD ABDUL HAI				MOHAMMAD ABDUL HAI									
	EBL Securities Limited				EBL Securities Limited				UCB Stock Brokerage Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
01-04-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
06-04-2021	50000	8.62	25000	8.80	329583	8.77	0	0.00	0	0.00	0	0.00	379583	8.75	3322413.10	25000	8.80	220000.00
07-04-2021	118116	8.92	50000	8.77	0	0.00	0	0.00	0	0.00	0	0.00	118116	8.92	1053004.60	50000	8.77	438600.00
13-04-2021	69589	8.53	50000	8.50	0	0.00	0	0.00	0	0.00	0	0.00	69589	8.53	593365.40	50000	8.50	425000.00
15-04-2021	157444	8.73	160000	8.71	0	0.00	0	0.00	0	0.00	0	0.00	157444	8.73	1374899.00	160000	8.71	1393500.00
19-04-2021	128588	9.06	130000	9.05	0	0.00	0	0.00	0	0.00	0	0.00	128588	9.06	1165054.40	130000	9.05	1176995.00
20-04-2021	444388	9.46	50000	9.74	0	0.00	0	0.00	502000	9.65	0	0.00	946388	9.56	9049457.30	50000	9.74	487000.00
21-04-2021	40812	9.78	0	0.00	0	0.00	40000	9.70	0	0.00	0	0.00	40812	9.78	398965.60	40000	9.70	388000.00
22-04-2021	717189	9.65	520000	9.52	0	0.00	289583	9.70	0	0.00	0	0.00	717189	9.65	6922659.60	809583	9.59	7760955.10
25-04-2021	376511	10.31	253307	10.50	0	0.00	0	0.00	0	0.00	0	0.00	376511	10.31	3880100.70	253307	10.50	2659723.50
26-04-2021	201369	10.58	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	201369	10.58	2130218.10	0	0.00	0.00
27-04-2021	610	10.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	610	10.30	6283.00	0	0.00	0.00
28-04-2021	189367	10.35	200000	10.30	0	0.00	0	0.00	0	0.00	0	0.00	189367	10.35	1960604.00	200000	10.30	2060000.00
29-04-2021	199637	10.93	170000	11.00	0	0.00	0	0.00	764000	10.82	800000	10.37	963637	10.84	10450129.70	970000	10.48	10162539.50
02-05-2021	273622	11.76	500000	11.66	100	12.00	0	0.00	0	0.00	0	0.00	273722	11.76	3218163.30	500000	11.66	5830000.00
03-05-2021	0	0.00	599000	12.65	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	599000	12.65	7577200.00
04-05-2021	101969	13.04	0	0.00	0	0.00	100	13.60	0	0.00	100000	13.70	101969	13.04	1329574.70	100100	13.70	1371360.00
05-05-2021	0	0.00	900000	14.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	900000	14.70	13230000.00
06-05-2021	0	0.00	102502	14.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	102502	14.60	1496529.20
11-05-2021	0	0.00	0	0.00	389060	14.26	0	0.00	0	0.00	0	0.00	389060	14.26	5548668.40	0	0.00	0.00
12-05-2021	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	621536	16.20	0	0.00	0.00	621536	16.20	10068883.20
16-05-2021	0	0.00	0	0.00	206600	16.31	389060	15.98	0	0.00	0	0.00	206600	16.31	3368918.70	389060	15.98	6216054.00
18-05-2021	0	0.00	0	0.00	60000	16.80	0	0.00	0	0.00	0	0.00	60000	16.80	1008000.00	0	0.00	0.00
19-05-2021	0	0.00	0	0.00	0	0.00	200000	17.80	0	0.00	0	0.00	0	0.00	0.00	200000	17.80	3560000.00
20-05-2021	0	0.00	0	0.00	151714	17.61	66600	17.00	0	0.00	0	0.00	151714	17.61	2672000.00	66600	17.00	1132200.00
23-05-2021	0	0.00	0	0.00	208758	17.54	0	0.00	0	0.00	0	0.00	208758	17.54	3662586.60	0	0.00	0.00
24-05-2021	0	0.00	0	0.00	136375	18.47	0	0.00	0	0.00	0	0.00	136375	18.47	2518923.90	0	0.00	0.00
25-05-2021	0	0.00	0	0.00	29300	18.22	0	0.00	903573	17.55	0	0.00	932873	17.57	16392612.80	0	0.00	0.00
27-05-2021	0	0.00	0	0.00	275718	17.79	50000	18.20	709427	18.34	0	0.00	985145	18.19	17917229.50	50000	18.20	910000.00
Total	3069211		3709809		1787208		1035343		2879000		1521536		7735419			6266688		

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

ii) Effects of 'MAKSONSPIN' at DSE by Mohammad Abdul Hai:

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6		7	8	9	10	11	12	13	14	15	16	17
Opening Balance										6915256	9.96	68906737.43						
Drag from this cell	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	6915256	9.96	68906737.43	0	0.00	0.00%	0.00%	0.00%	
06-04-2021	379583	8.75	3322413.10	25000	8.80	220000.00	0	9.90	247535.11	7269839	9.90	71981615.42	979443	0.00	0.00%	38.75%	2.55%	41.31%
07-04-2021	118116	8.92	1053004.60	50000	8.77	438600.00	0	9.89	494281.71	7337955	9.89	72540338.32	2110352	0.00	0.00%	5.60%	2.37%	7.97%
13-04-2021	69589	8.53	593365.40	50000	8.50	425000.00	0	9.87	493643.40	7357544	9.87	72640060.32	769117	0.00	0.00%	9.05%	6.50%	15.55%
15-04-2021	157444	8.73	1374899.00	160000	8.71	1393500.00	0	9.85	1575836.65	7354988	9.85	72439122.67	753222	0.00	0.00%	20.90%	21.24%	42.14%
19-04-2021	128588	9.06	1165054.40	130000	9.05	1176995.00	0	9.84	1278605.71	7353576	9.84	72325571.36	1605829	0.00	0.00%	8.01%	8.10%	16.10%
20-04-2021	946388	9.56	9049457.30	50000	9.74	487000.00	0	9.80	490213.14	8249964	9.80	80884815.52	3076486	0.00	0.00%	30.76%	1.63%	32.39%
21-04-2021	40812	9.78	398965.60	40000	9.70	388000.00	0	9.80	392164.89	8250776	9.80	80891616.23	1336880	0.00	0.00%	3.05%	2.99%	6.04%
22-04-2021	717189	9.65	6922659.60	809583	9.59	7760955.10	0	9.79	7927433.36	8158382	9.79	79886842.47	2798408	0.00	0.00%	25.63%	28.93%	54.56%
25-04-2021	376511	10.31	3880100.70	253307	10.50	2659723.50	0	9.81	2486118.23	8281586	9.81	81280824.94	6709331	0.00	0.00%	5.61%	3.78%	9.39%
26-04-2021	201369	10.58	2130218.10	0	0.00	0.00	0	0.00	0.00	8482955	9.83	83411043.04	3881427	0.00	0.00%	5.19%	0.00%	5.19%
27-04-2021	610	10.30	6283.00	0	0.00	0.00	0	0.00	0.00	8483565	9.83	83417326.04	2108968	0.00	0.00%	0.03%	0.00%	0.03%
28-04-2021	189367	10.35	1960604.00	200000	10.30	2060000.00	0	9.84	1968836.61	8472932	9.84	83409093.44	2813617	0.00	0.00%	6.73%	7.11%	13.84%
29-04-2021	963637	10.84	10450129.70	970000	10.48	10162539.50	0	9.95	9647939.46	8466569	9.95	84211283.68	7046700	0.00	0.00%	13.68%	13.77%	27.44%
02-05-2021	273722	11.76	3218163.30	500000	11.66	5830000.00	0	10.00	5001518.08	8240291	10.00	82427928.89	17276699	0.00	0.00%	1.58%	2.89%	4.48%
03-05-2021	0	0.00	0.00	599000	12.65	7577200.00	0	10.00	5991818.66	7641291	10.00	76436110.23	14803323	0.00	0.00%	0.00%	4.05%	4.05%
04-05-2021	101969	13.04	1329574.70	100100	13.70	1371360.00	0	10.04	1005305.91	7643160	10.04	76760379.02	19349479	0.00	0.00%	0.53%	0.52%	1.04%
05-05-2021	0	0.00	0.00	900000	14.70	13230000.00	0	10.04	9038714.50	6743160	10.04	67721664.52	19057209	0.00	0.00%	0.00%	4.72%	4.72%
06-05-2021	0	0.00	0.00	102502	14.60	1496529.20	0	10.04	1029429.24	6640658	10.04	66692235.28	17864125	0.00	0.00%	0.00%	0.57%	0.57%
11-05-2021	389060	14.26	5548668.40	0	0.00	0.00	0	0.00	0.00	7029718	10.28	72240903.68	15188437	0.00	0.00%	2.56%	0.00%	2.56%
12-05-2021	0	0.00	0.00	621536	16.20	10068883.20	0	10.28	6387215.29	6408182	10.28	65853688.39	15653266	0.00	0.00%	0.00%	3.97%	3.97%
16-05-2021	206600	16.31	3368918.70	389060	15.98	6216054.00	0	10.46	4071448.99	6225722	10.46	65151158.09	18696320	0.00	0.00%	1.11%	2.08%	3.19%
18-05-2021	60000	16.80	1008000.00	0	0.00	0.00	0	0.00	0.00	6285722	10.53	66159158.09	14031986	0.00	0.00%	0.43%	0.00%	0.43%
19-05-2021	0	0.00	0.00	200000	17.80	3560000.00	0	10.53	2105061.54	6085722	10.53	64054096.56	16178697	0.00	0.00%	0.00%	1.24%	1.24%
20-05-2021	151714	17.61	2672000.00	66600	17.00	1132200.00	0	10.70	712465.51	6170836	10.70	66013631.04	12904614	0.00	0.00%	1.18%	0.52%	1.69%
23-05-2021	208758	17.54	3662586.60	0	0.00	0.00	0	0.00	0.00	6379594	10.92	69676217.64	14177931	0.00	0.00%	1.47%	0.00%	1.47%
24-05-2021	136375	18.47	2518923.90	0	0.00	0.00	0	0.00	0.00	6515969	11.08	72195141.54	13219693	0.00	0.00%	1.03%	0.00%	1.03%
25-05-2021	932873	17.57	16392612.80	0	0.00	0.00	0	0.00	0.00	7448842	11.89	88587754.34	12267718	0.00	0.00%	7.60%	0.00%	7.60%
27-05-2021	985145	18.19	17917229.50	50000	18.20	910000.00	0	12.63	631403.53	8383987	12.63	105873580.31	15109641	0.00	0.00%	6.52%	0.33%	6.85%
Total	7735419	12.92	99943832.40	6266688	12.54	78564539.50	0	10.05	62976989.52	8383987	12.63	105873580.31						

iii) Trade monitoring screenshots of Mohammad Abdul Hai (Public market):

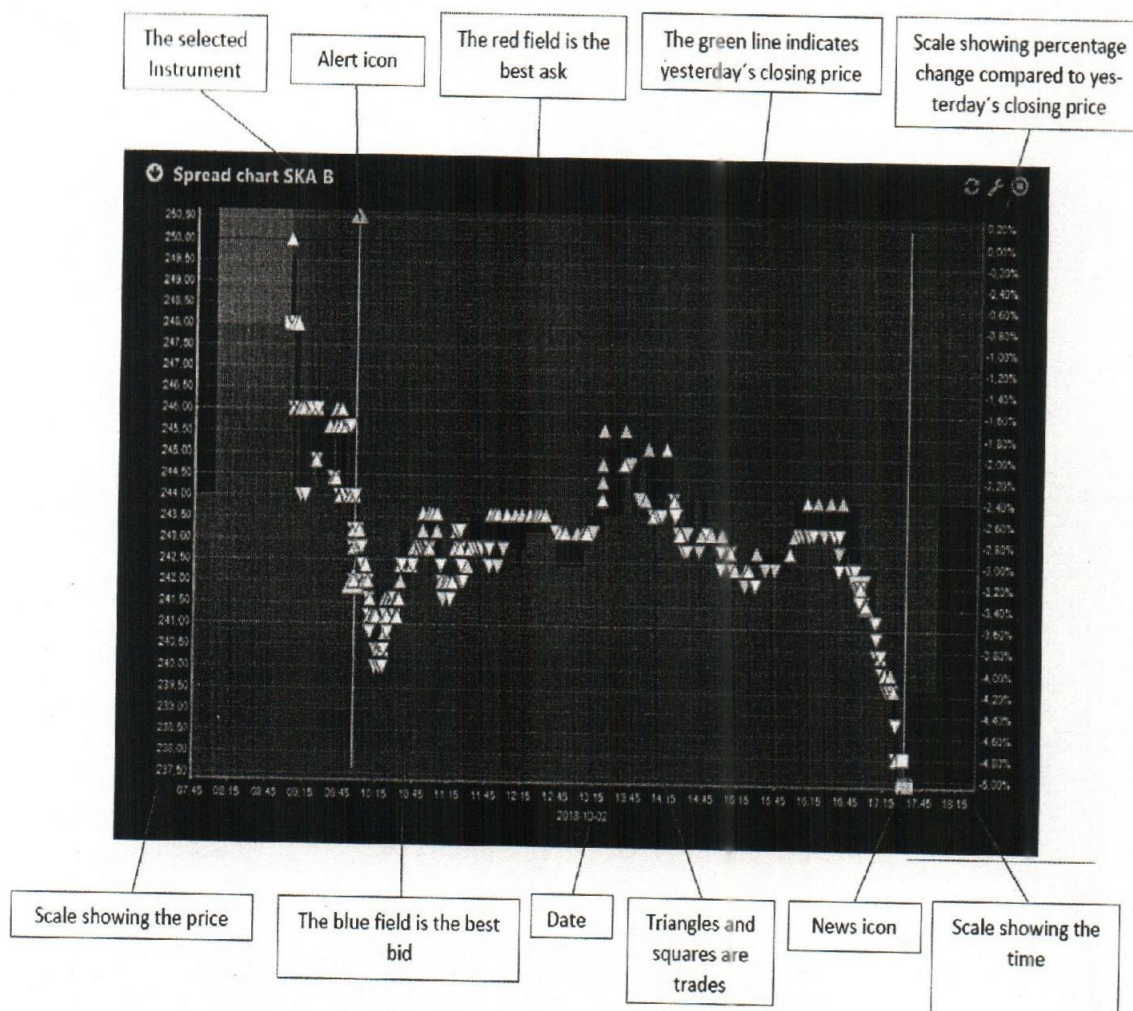
The Investigation Team collected Trade monitoring screenshots from the Surveillance Department on some trading dates where appearance of active trading of Mohammad Abdul Hai was observed to influence the price of 'MAKSONSPIN'.



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The details of the graphs are given below:



- ▲ Green triangle represents trade of MAKSONSPIN by Mohammad Abdul Hai
- △ White triangle represents trade of MAKSONSPIN by other clients

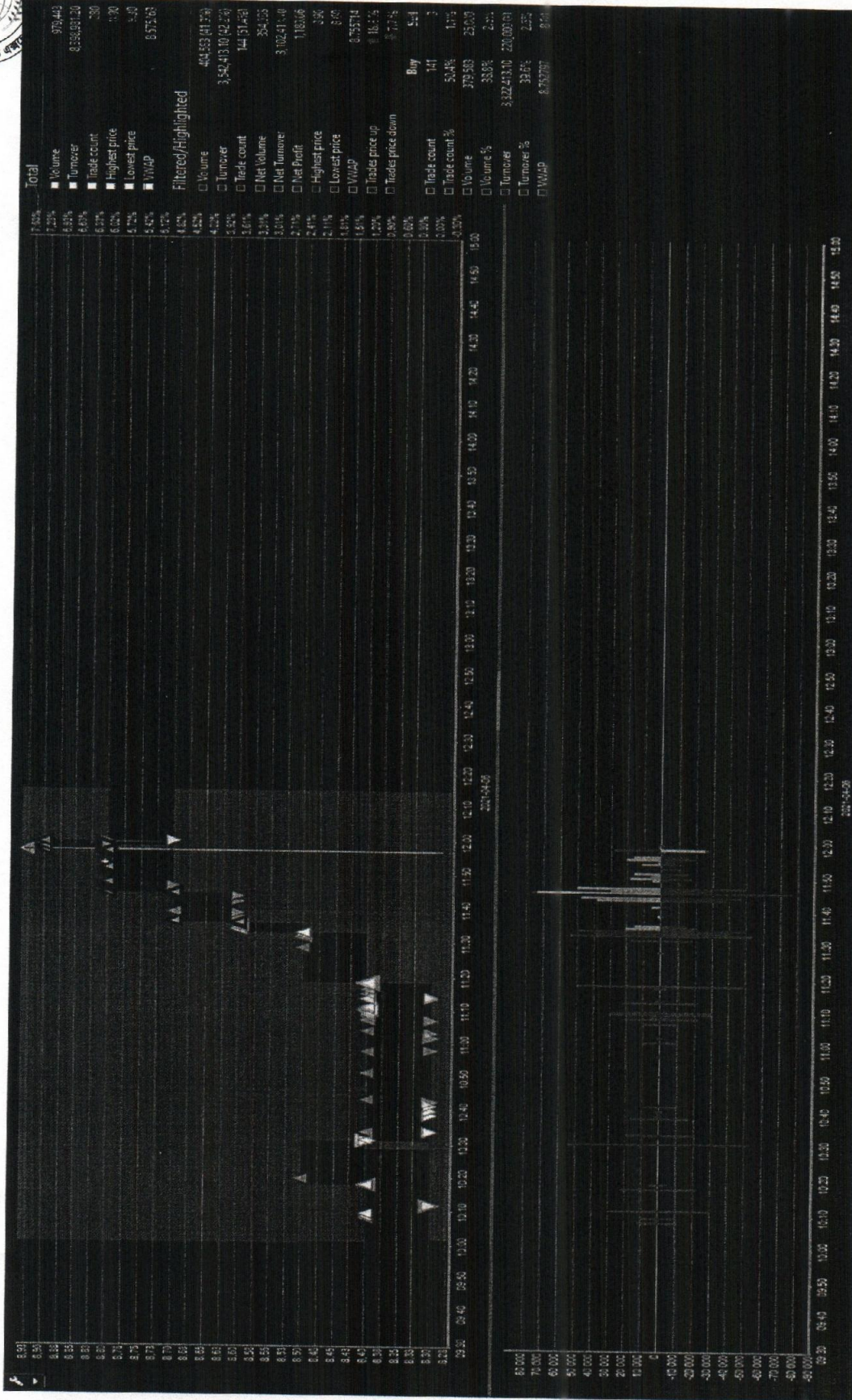
After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it is found that Mohammad Abdul Hai was involved in trading of shares of 'MAKSONSPIN' which influenced price of shares of the said company on several dates as follows:



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6/4/2021



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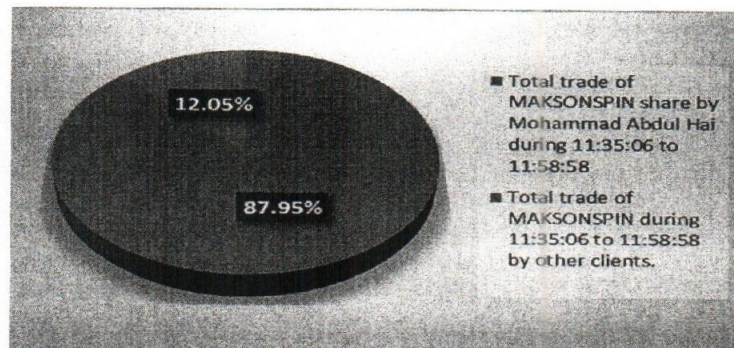


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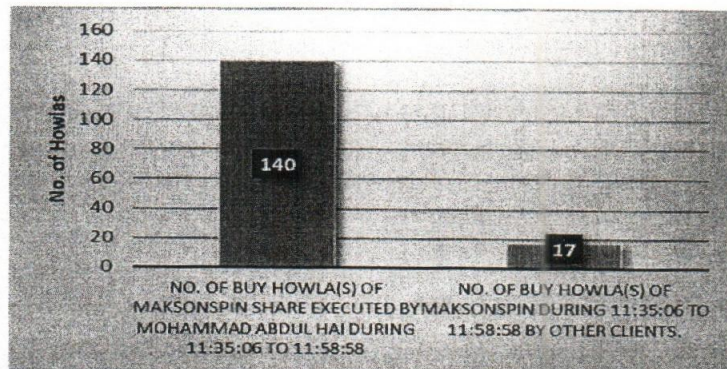
Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

It was observed in the above graph that on 06-04-2021, total number of trades of MAKSONSPIN in the market was 280, whereas number of trades (buy) executed by Mohammad Abdul Hai were 141 which is approximately 50.36% of the total number of trades in the market. Again, total traded volume of MAKSONSPIN in the market on that day was 979,443 whereas buy volume by the said client(s) was 379,583 which is approximately 38.75% of the total traded volume in the market. It is evident that the client had significant participation in the market on 06-04-2021 in trading of MAKSONSPIN share.

On 06-04-2021, trading of MAKSONSPIN share was started at Tk. 8.40 which is Tk. 0.10 more than the YCP of Tk. 8.30. On that day, Mohammad Abdul Hai started series of trading at 11:35:06 at price Tk. 8.60 and induced the same to rise to Tk. 8.90 up to 11:58:58. It can also be observed from the above graph that Mohammad Abdul Hai executed significant trades during this time period. It is mentionable here that from 11:35:06 to 11:58:58, Mohammad Abdul Hai bought 378,583 shares of MAKSONSPIN compared to the total traded share of 430,433. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mohammad Abdul Hai executed 140 howlas to purchase of shares of MAKSONSPIN compared to the total number of howlas of 157 as shown in the following Bar Chart.



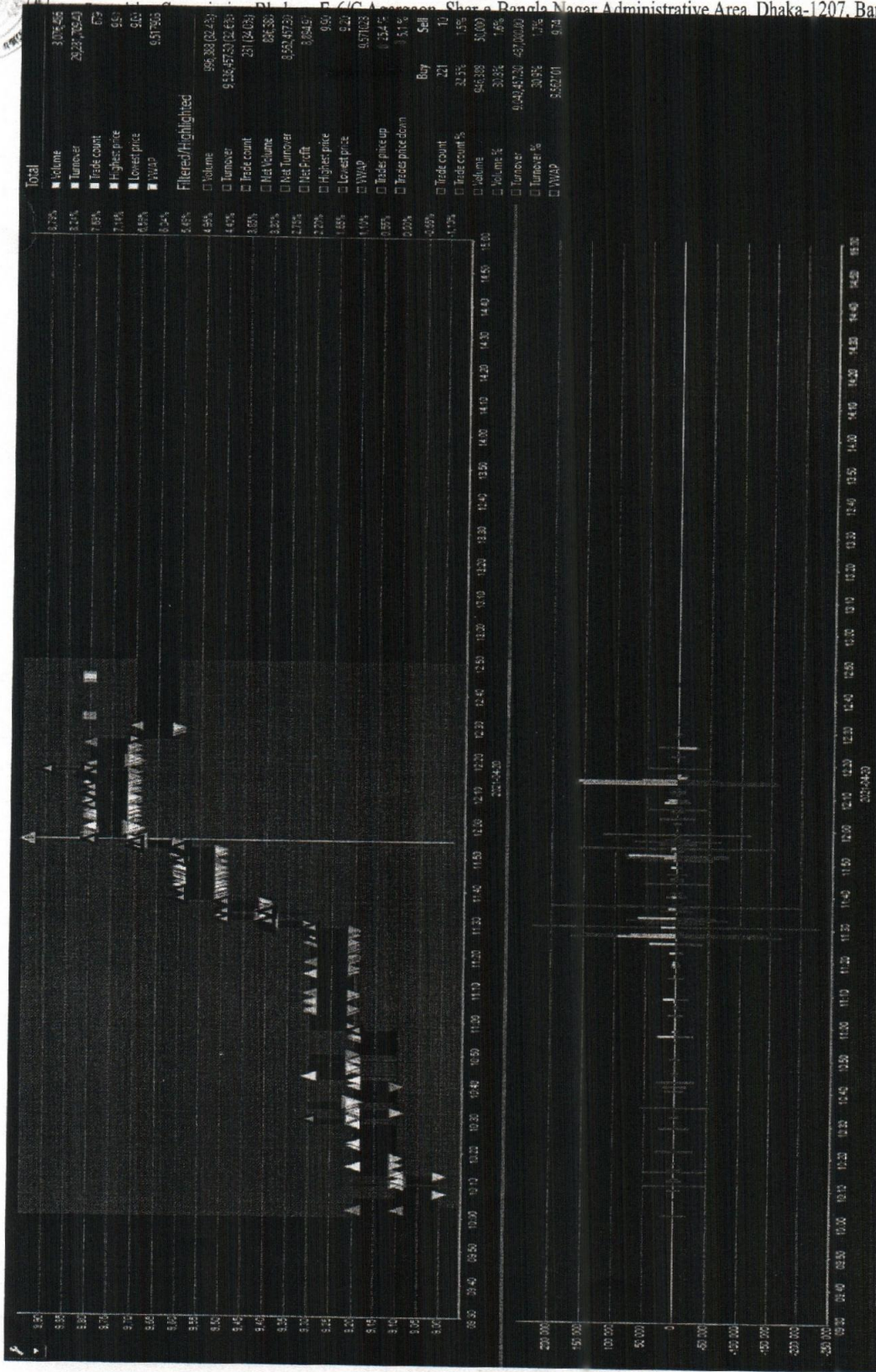
It is observed from the above graphs and screenshot that Mohammad Abdul Hai bought 87.95% of the total trades of MAKSONSPIN shares by executing 140 of total 157 howlas from 11:35:06 to 11:58:58 on 06-04-2021. From 11:35:06 to 11:58:58, Mohammad Abdul Hai induced the price to rise from Tk. 8.60 to Tk. 8.90. Thus, it seems that Mohammad Abdul Hai were actively trying to lift the price of MAKSONSPIN share. At the end of the day price of MAKSONSPIN share was increased by Tk. 0.40 which is approximately 4.82% higher than YCP.

BANGLADESH SECURITIES AND EXCHANGE COMMISSION



Regulatory Office, Bangladesh Securities and Exchange Commission, P.O. Box 100, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

20/04/2021



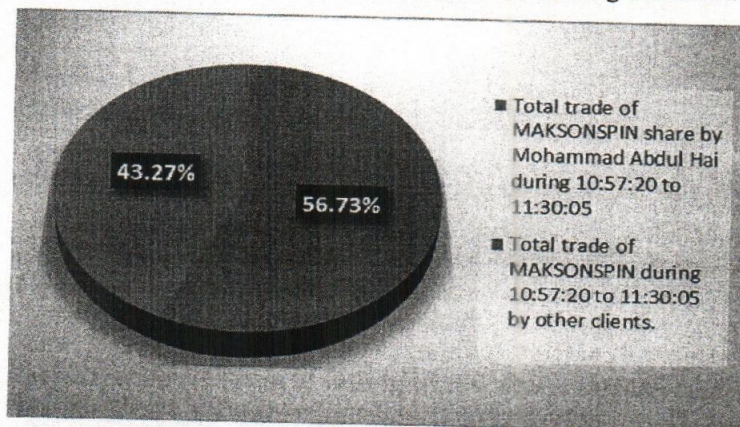


BANGLADESH SECURITIES AND EXCHANGE COMMISSION

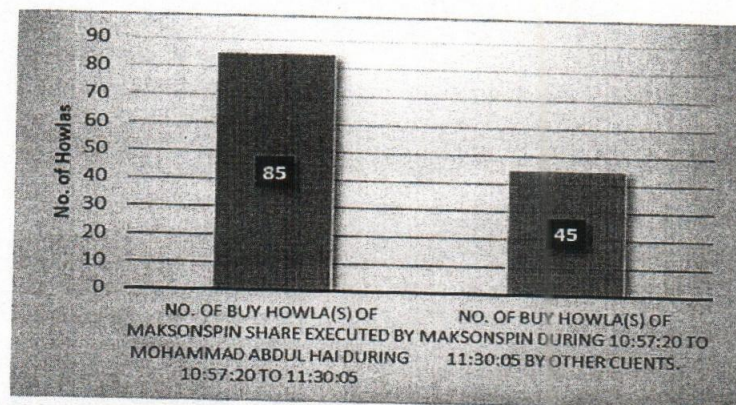
Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

It was observed in the above graph that on 20-04-2021, total number of trades of MAKSONSPIN in the market was 679, whereas number of trades (buy) executed by Mohammad Abdul Hai were 221 which is approximately 32.55% of the total number of trades in the market. Again, total traded volume of MAKSONSPIN in the market on that day was 3,076,486 whereas buy volume by the said client(s) was 946,388 which is approximately 30.76% of the total traded volume in the market. It is evident that the client had significant participation in the market on 20-04-2021 in trading of MAKSONSPIN share.

On 20-04-2021, trading of MAKSONSPIN share was started at Tk. 9.10 which is similar as the YCP of Tk. 9.10. On that day, Mohammad Abdul Hai started series of trading at 10:57:20 at price Tk. 9.20 and induced the same to rise to Tk. 9.40 up to 11:30:05. It can also be observed from the above graph that Mohammad Abdul Hai executed significant trades during this time period. It is mentionable here that from 10:57:20 to 11:30:05, Mohammad Abdul Hai bought 327,712 shares of MAKSONSPIN compared to the total traded share of 577,717. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mohammad Abdul Hai executed 85 howlas to purchase of shares of MAKSONSPIN compared to the total number of howlas of 130 as shown in the following Bar Chart.

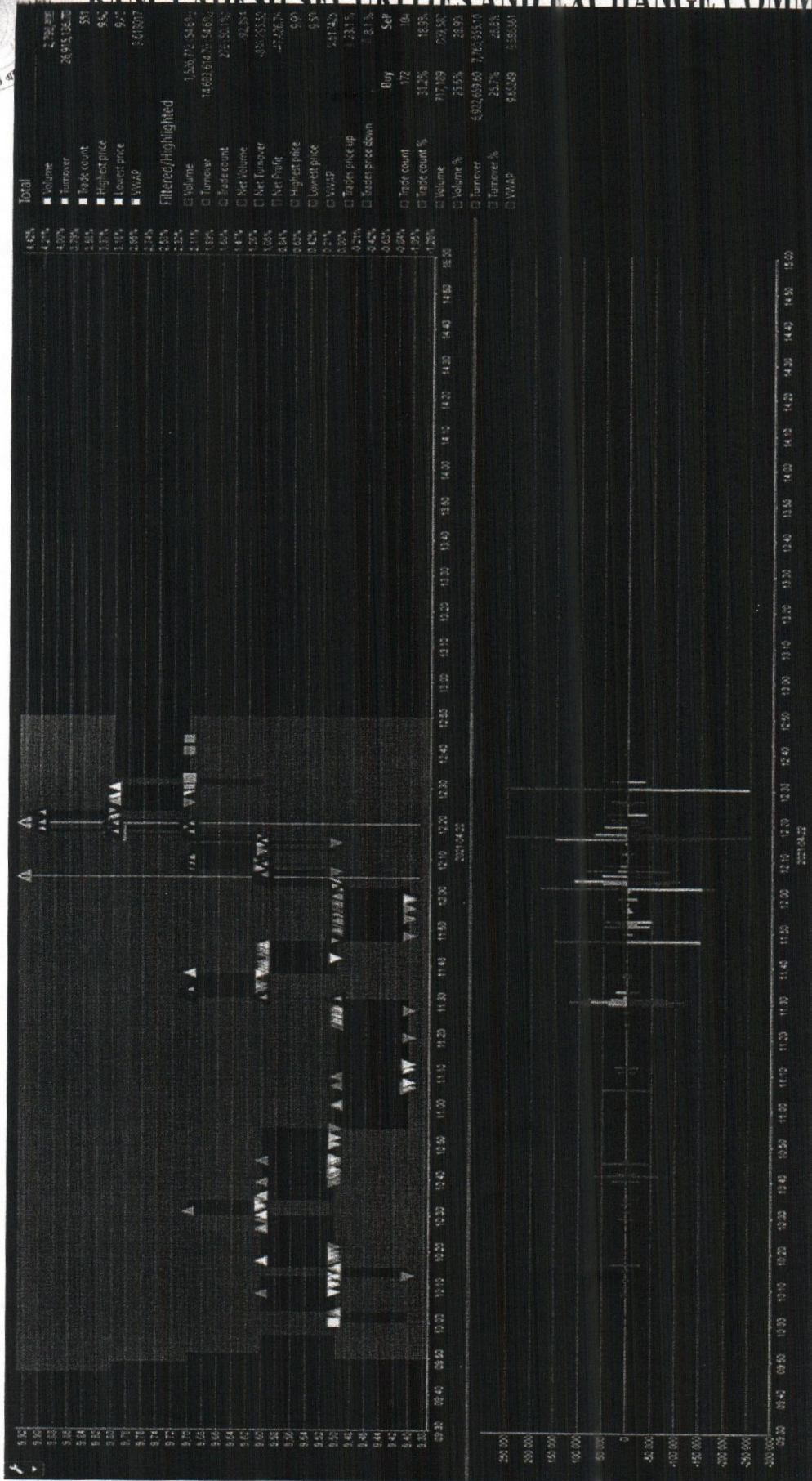


It is observed from the above graphs and screenshot that Mohammad Abdul Hai bought 56.73% of the total trades of MAKSONSPIN shares by executing 85 of total 130 howlas from 10:57:20 to 11:30:05 on 20-04-2021. From 10:57:20 to 11:30:05, Mohammad Abdul Hai induced the price to rise from Tk. 9.20 to Tk. 9.40. Thus, it seems that Mohammad Abdul Hai were actively trying to lift the price of MAKSONSPIN share. At the end of the day price of MAKSONSPIN share was increased by Tk. 0.70 which is approximately 7.69% higher than YCP.

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22/4/2021

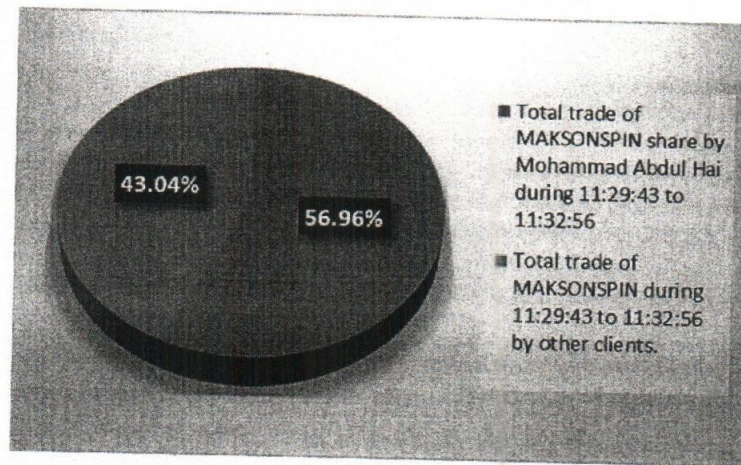


BANGLADESH SECURITIES AND EXCHANGE COMMISSION

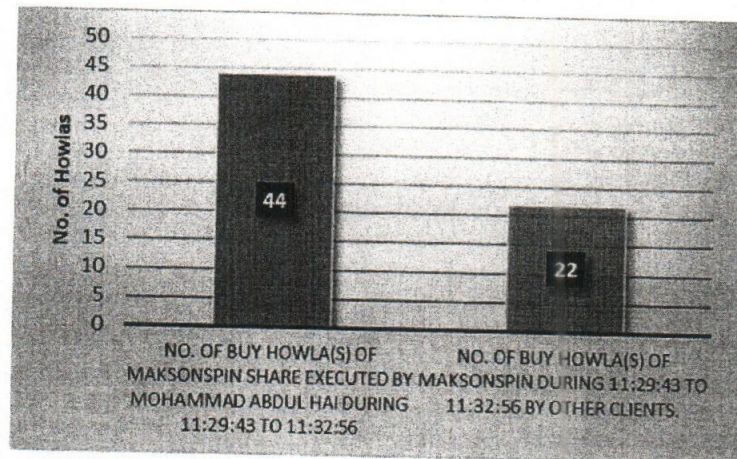
Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

It was observed in the above graph that on 22-04-2021, total number of trades of MAKSONSPIN in the market was 551, whereas number of trades (buy) executed by Mohammad Abdul Hai were 172 which is approximately 31.22% of the total number of trades in the market. Again, total traded volume of MAKSONSPIN in the market on that day was 2,798,408 whereas buy volume by the said client(s) was 717,189 which is approximately 25.63% of the total traded volume in the market. It is evident that the client had significant participation in the market on 22-04-2021 in trading of MAKSONSPIN share.

On 22-04-2021, trading of MAKSONSPIN share was started at Tk. 9.50 which is similar as the YCP of Tk. 9.50. On that day, Mohammad Abdul Hai started series of trading at 11:29:43 at price Tk. 9.50 and induced the same to rise to Tk. 9.70 up to 11:32:56. It can also be observed from the above graph that Mohammad Abdul Hai executed significant trades during this time period. It is mentionable here that from 11:29:43 to 11:32:56, Mohammad Abdul Hai bought 179,984 shares of MAKSONSPIN compared to the total traded share of 315,984. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mohammad Abdul Hai executed 44 howlas to purchase of shares of MAKSONSPIN compared to the total number of howlas of 66 as shown in the following Bar Chart.



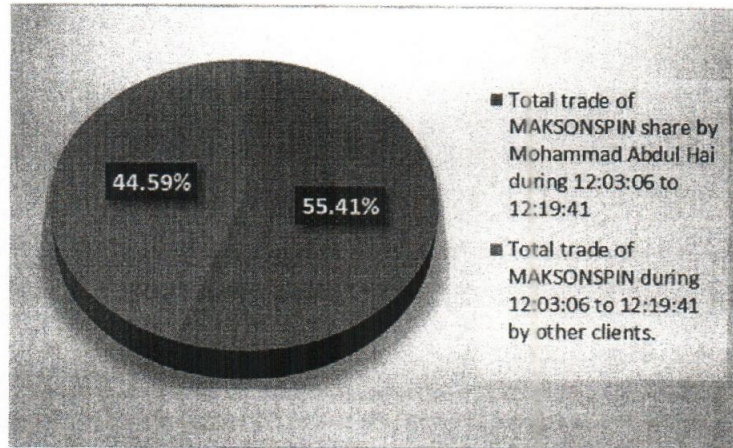
It is observed from the above graphs and screenshot that Mohammad Abdul Hai bought 56.96% of the total trades of MAKSONSPIN shares by executing 44 of total 66 howlas from 11:29:43 to 11:32:56 on 22-04-2021. From 11:29:43 to 11:32:56, Mohammad Abdul Hai induced the price to rise from

BANGLADESH SECURITIES AND EXCHANGE COMMISSION

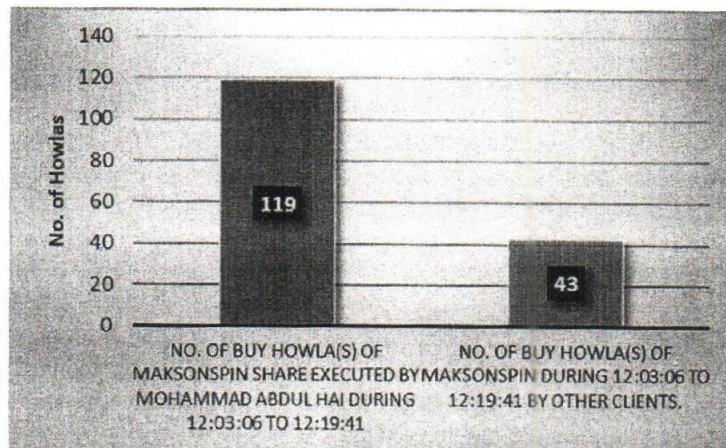
Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

Tk. 9.50 to Tk. 9.70. Thus, it seems that Mohammad Abdul Hai were actively trying to lift the price of MAKSONSPIN share. At the end of the day price of MAKSONSPIN share was increased by Tk. 0.20 which is approximately 2.11% higher than YCP.

Again, on that day, Mohammad Abdul Hai started series of trading at 12:03:06 at price Tk. 9.60 and induced the same to rise to Tk. 9.90 up to 12:19:41. It can also be observed from the above graph that Mohammad Abdul Hai executed significant trades during this time period. It is mentionable here that from 12:03:06 to 12:19:41, Mohammad Abdul Hai bought 533,855 shares of MAKSONSPIN compared to the total traded share of 963,542. This is shown in the following Pie Chart.



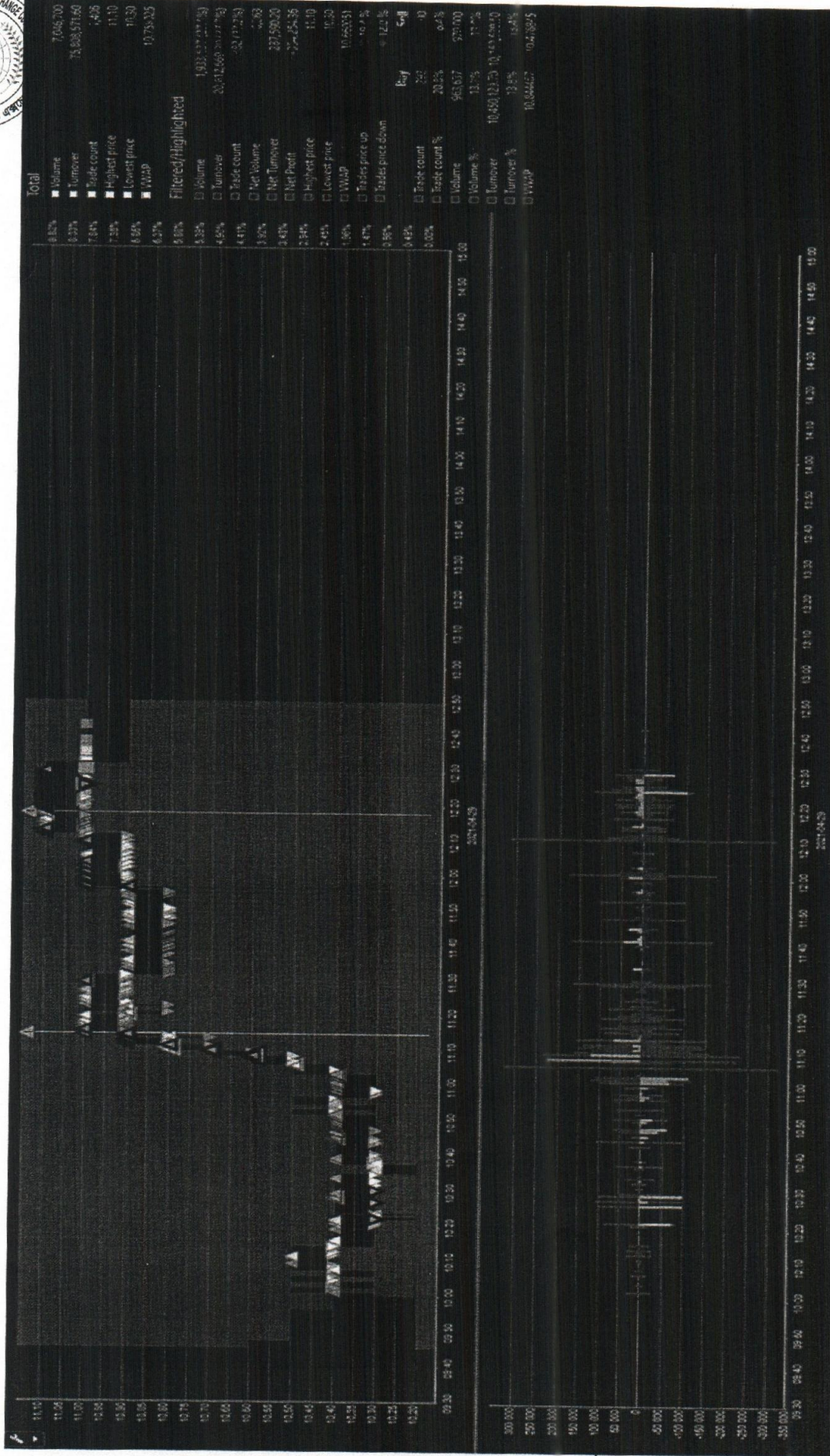
It is also found that during the aforementioned period, Mohammad Abdul Hai executed 119 howlas to purchase of shares of MAKSONSPIN compared to the total number of howlas of 162 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Abdul Hai bought 55.41% of the total trades of MAKSONSPIN shares by executing 119 of total 162 howlas from 12:03:06 to 12:19:41 on 22-04-2021. From 12:03:06 to 12:19:41, Mohammad Abdul Hai induced the price to rise from Tk. 9.60 to Tk. 9.90. Thus, it seems that Mohammad Abdul Hai were actively trying to lift the price of MAKSONSPIN share. At the end of the day price of MAKSONSPIN share was increased by Tk. 0.20 which is approximately 2.11% higher than YCP.



29/4/2021

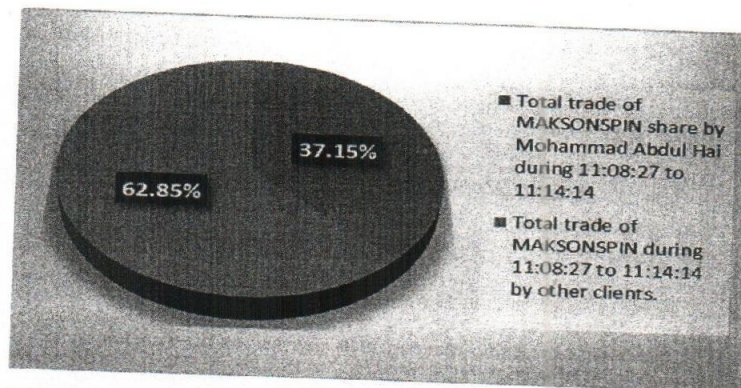


BANGLADESH SECURITIES AND EXCHANGE COMMISSION

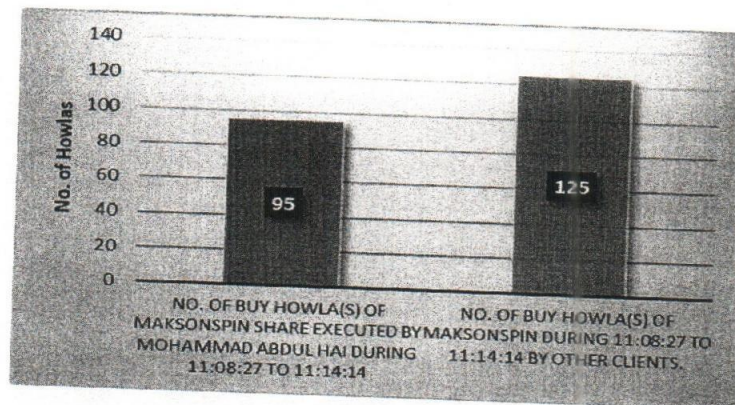
Securities Commission Bhaban, E-6/C Agargaon, Sher-e-Bangla Nagar Administrative Area, Dhaka-1207, Bangladesh.

It was observed in the above graph that on 29-04-2021, total number of trades of MAKSONSPIN in the market was 1406, whereas number of trades (buy) executed by Mohammad Abdul Hai were 292 which is approximately 20.77% of the total number of trades in the market. Again, total traded volume of MAKSONSPIN in the market on that day was 7,046,700 whereas buy volume by the said client(s) was 963,637 which is approximately 13.68% of the total traded volume in the market. It is evident that the client had significant participation in the market on 29-04-2021 in trading of MAKSONSPIN share.

On 29-04-2021, trading of MAKSONSPIN share was started at Tk. 10.40 which is Tk. 0.20 more than the YCP of Tk. 10.20. On that day, Mohammad Abdul Hai started series of trading at 11:08:27 at price Tk. 10.60 and induced the same to rise to Tk. 11.00 up to 11:14:14. It can also be observed from the above graph that Mohammad Abdul Hai executed significant trades during this time period. It is mentionable here that from 11:08:27 to 11:14:14, Mohammad Abdul Hai bought 458,367 shares of MAKSONSPIN compared to the total traded share of 1,233,950. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mohammad Abdul Hai executed 95 howlas to purchase of shares of MAKSONSPIN compared to the total number of howlas of 220 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Abdul Hai bought 37.15% of the total trades of MAKSONSPIN shares by executing 95 of total 220 howlas from 11:08:27 to 11:14:14 on 29-04-2021. From 11:08:27 to 11:14:14, Mohammad Abdul Hai induced the price to rise from Tk. 10.60 to Tk. 11.00. Thus, it seems that Mohammad Abdul Hai were actively trying to lift the price of MAKSONSPIN share. At the end of the day price of MAKSONSPIN share was increased by Tk. 0.80 which is approximately 7.84% higher than YCP.

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iv) Gain/Loss of Mohammad Abdul Hai by trading shares of MAKSONSPIN from 05.04.2021 to 27.05.2021:

Total Buy				Total Sale			Cost of Shares Sold			Stock Position	
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	
7735419	12.92	99943832.40	6266688	12.54	78564539.50	10.05	62976989.52	8383987	12.63	105873580.31	

Summary

Realized Capital gain (loss) per unit	2.49	Average Sale Price - Average Cost Price
Realized Capital gain (loss) %	24.75%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain (loss) TK	15587549.98	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (27-05-2021)	18.20	Closing Price of Last Investigation Date
Unrealized gain (loss) per unit	5.57	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain (loss) %	44.12%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain (loss) TK	46714983.09	Quantity of Stock Position x Unrealized gain (loss) per unit

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As per DSE trade data, Mohammad Abdul Hai bought total 7,735,419 shares of "MAKSONSPIN" from 05.04.2021 to 27.05.2021. He traded 4.59% of total trade volume of 3,04,800,189 shares of "MAKSONSPIN" with the said BO accounts and realized a capital gain of Tk. 15,587,549.98 by trading of shares of "MAKSONSPIN" during the investigation period. Moreover, his unrealized gain is Tk.46,714,983.09 during the investigation period.

Findings:

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 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;"

Hence, it is observed from the aforesaid discussion that Mohammad Abdul Hai was involved directly and indirectly in a series of transaction of share of "MAKSONSPIN" in order to create the appearance of active trading of the said share.

Contraventions: Through the aforesaid activities it appears that-

It appeared that **Mohammad Abdul Hai (BOID # 1201950042747609; 1201950045200407 and 1205590042907791)** has violated **Section 17(e)(v) of Securities and Exchange Ordinance, 1969** by directly or indirectly effecting a series of transactions in the shares of "MAKSONSPIN" creating the appearance of active trading therein and raising price of the said share.



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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক ১১ জানুয়ারী ২০২৩ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩২৮৯/২০২২/৮০ স্মারকমূলে Mohammad Abdul Hai-কে ২৯ জানুয়ারী ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিতি হতে বলা হয়। শুনানীতে উপস্থিত হয়ে Mohammad Abdul Hai-এর পক্ষে Mr. Khan Mehedi Hasan (on behalf) নিম্নলিখিত বক্তব্য দাখিল করেন;

“...With reference to BSEC letter No. BSEC/Enforcement/3289/2022/80 dated January 11, 2023; I would like to humbly inform you that as an investor, I have limitations to know all the rules and regulations as there are so many rules and regulations around capital market. As a part of investment, I was investing in Maksons Spinning Mills Limited (MAKSONSPIN) and if there was any mistake that took place during the trade execution that was completely beyond my knowledge regarding related rules and regulations.

Considering investment perspective, I am selecting instrument and participating in trade. But I have no clear idea about the maximum percentage of day trade volume of a specific instrument that an investor can trade which may not be the violation of regulatory bindings.

Therefore, I am sincerely apologized for that I could not carefully observed the day-wise total trade volume and percentage at the time of trade. Moreover, due to lack of knowledge and unawareness, I am inexpert to calculate the instrument wise collective shareholding percentage. I would be more cautious and careful for the next time in trade execution as well as significant transactions in any individual instrument.

I am personally assuring you that no such kind of mistake will ever be made from my end that can be affect the interest of investors as well as the capital market.

I express my deep regrets and sincere apologies again and earnestly request you to pardon me considering the unintended mistake. I will be more cautious and careful in the future.....”

যেহেতু, Mohammad Abdul Hai-এর উপর্যুক্ত বক্তব্য থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক; সিকিউরিটিজ আইন সংক্রান্ত জ্ঞানের সীমাবদ্ধতার কারণে তিনি এ ধরনের সিরিজ লেনদেন করেছেন এবং এজন্য ক্ষমা প্রার্থনা করেছেন; এক্ষেত্রে Mohammad Abdul Hai-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mohammad Abdul Hai উপর্যুক্ত কর্মকাণ্ডের ফলে Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 লংঘন করেছেন, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Mohammad Abdul Hai-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিবোধ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mohammad Abdul Hai-কে জরিমানা করা প্রয়োজন ও সমীচীন;

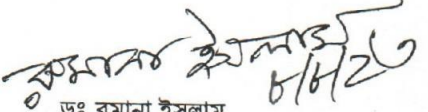
অতএব, সেহেতু, কমিশন উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর Section 22 এ প্রদত্ত ক্ষমতাবলে-

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- Mohammad Abdul Hai-কে ৩৫.০০ (পয়ত্রিশ) লক্ষ টাকা অর্থদন্ড ধার্য্য করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


ডঃ রুমানা ইসলাম
কমিশনার।

বিতরণ:

সি Mr. Mohammad Abdul Hai

(Client Code: 41777, BOID: 1201950042747609 &

Client Code: 41888, BOID: 1201950045200407)

EBL Securities Limited

Jiban Bima Bhaban (1st Floor), 10, Dilkusha C/A, Dhaka-1000