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Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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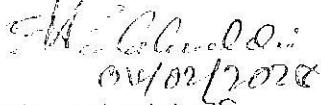
নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২১৮
তারিখঃ তারিখঃ ফেব্রুয়ারি ০৬, ২০২৫

Mr. Mohammad Shamsul Alam
(BOID: 1203510068173076)

বিষয়: আদেশ।

কমিশনের আদেশ নং- নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১/২০২৪/২১৭ তারিখঃ ফেব্রুয়ারি ০২, ২০২৫ এর সত্যায়িত
অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


০৬/০২/২০২৫

মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

IP PABX: 88-02-09609-100600, Ext- 1220

ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

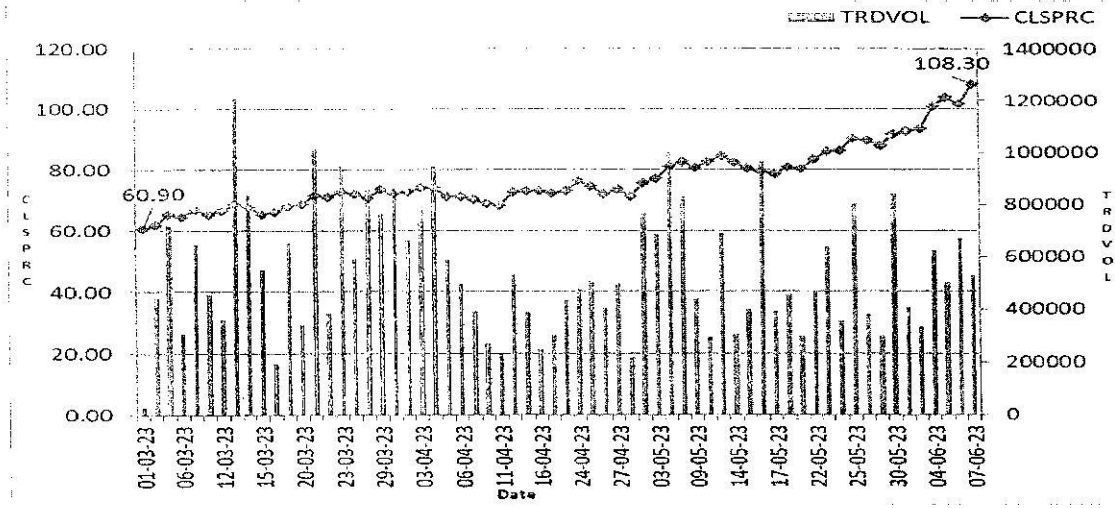
১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/Surveillance/2003-0097]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

আদেশ

যেহেতু, Securities and Exchange Ordinance, 1987 এর Section 2 (33) অনুযায়ী বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন বা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, জুন ১১, ২০২৩ তারিখের DSE Surveillance Note # 42/2023 অনুযায়ী এবং Regulation 16(3)(c)(ii) দ্বারা নির্ধারিত (Investigation) Regulations, 2013 দ্বারা পদক্ষেপ গ্রহণ করা হয়েছে।
ক্রমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ০২.০৩.২০২৩ থেকে ০৭.০৬.২০২৩ পর্যন্ত সময়ে Fine Foods Limited (FINEFOODS)-এর শেয়ার লেনদেন সংক্রান্ত তদন্ত (investigation) কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Trends of closing price and trade volume OF "FINEFOODS" in public market



Yesterday Closing Price (YCP) of the share of FINE FOODS LIMITED as on 02-03-2023 was Tk. 60.90 and closing price of the same was Tk. 108.30 as on 07-06-2023. During this period from 02-03-2023 to 07-06-2023, price of the share of FINE FOODS LIMITED was increased by Tk. 47.40 which is approximately 77.83% higher compared to closing price of 01-03-2023.

Observations and findings:

A. Trade details of Mohammad Shamsul Alam and associates:

Observation- 1:

Mohammad Shamsul Alam (Client code # 22232 of Stock & Bond Limited) was the 7th top buyer of FINEFOODS share from 02-03-2023 to 07-06-2023. After examining the relevant documents, it was found that the said client was associated with another account(s) from which they traded shares of "FINEFOODS" during the investigation period. Details are as follows:

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CLIENT	BO FATHER/	BO	
1203510068173076	22232	Mohammad Shamsul Alam	Stock & Bond Limited
		Ltd	Stock & Bond Limited
1205720075603052	04008	A A A Agro Enterprise	NLI Securities Limited
1203510066591329	22260	Mohammed Jahangir Alam	Stock & Bond Limited
1602170066475452	4733	Sajjya Jasmin	Mercantile Bank Securities Limited
1203510068907832	22246	Sultana Parvin	Stock & Bond Limited

a) Individual Trade Patterns, Trade monitoring screenshots, Effects of "FINEFOODS" at DSE in public market by Mohammad Shamsul Alam and associates and gain and loss statement are given below:



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a) Effects of "FINEFOODS" at DSE (both in Public Market and Block Market) by Mohammad Sham Alam and Associates:

Date	BUY			SAFE			Cost of Shares Sold			Stock Position			Market			Block		
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credit	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Qty	Close Price at DSE	Mar Chg	Client Qty	Client Price	Client Sale (%)
16-03-2023	3552	60.87	222407.70	36170	60.10	174876.00	0	61.70	2231542.80	1373730	61.72	84783627.62	489	52.20		3%	8.14%	16.57
17-03-2023	10755	62.92	17429131.10	205926	62.83	1300562.90	0	61.70	1294177.26	1374151	61.70	84779562.52	578	55.30		3%	24.83%	16.43%
18-03-2023	4273	64.42	4140706.90	12985	64.96	43525.00	0	62.01	805178.52	1492864	62.01	92570044.73	503	64.70		0%	1.90%	19.00%
19-03-2023	4273	65.47	7530949.70	14855	64.56	90332.00	0	62.29	925324.28	1458551	62.29	9083470.05	524	67.00		1%	16.50%	29.18%
20-03-2023	4273	65.93	8214356.40	133000	66.18	194275.00	0	62.46	5953668.18	1478069	62.46	9332030.27	152	65.30		1%	11.30%	20.21%
21-03-2023	4273	67.52	10094296.70	190599	68.21	107474.00	0	62.73	8371452.99	1469053	62.73	9219313.88	964	66.70		2%	10.07%	18.22%
22-03-2023	10234	70.27	4921166.70	115936	69.63	912630.20	0	63.17	90246669.70	1428558	63.17	90246669.70	813	68.80		1%	15.26%	27.13%
16-03-2023	10234	68.50	664000.00	135844	66.00	82430.40	0	63.58	8616869.60	1257012	63.58	79852470.35	1001	67.70		3%	13.87%	22.15%
19-03-2023	58058	68.11	3954414.00	52000	68.18	455000.00	0	63.73	3313847.73	1257012	63.73	79852470.35	1189	65.40		2%	10.03%	25.88%
23-03-2023	0	0.00	0.00	57051	73.51	93705.70	0	63.73	3313847.73	1257012	63.73	79852470.35	524	66.10		3%	13.87%	22.15%
27-03-2023	0	0.00	0.00	360511	79.19	387324.10	0	63.73	3313847.73	1257012	63.73	79852470.35	488	68.00		3%	13.87%	16.22%
28-03-2023	25000	71.20	1779912.30	268032	70.89	989396.10	0	63.73	3313847.73	1257012	63.73	79852470.35	018	72.90		3%	13.87%	16.22%
29-03-2023	81349	70.06	584080.60	347468	71.34	789630.80	0	64.80	22517556.93	238354	64.80	15446457.70	884	72.10		3%	13.87%	16.22%
30-03-2023	20000	72.26	1445200.00	0	0.00	0.00	0	64.80	22517556.93	238354	64.80	15446457.70	372	70.70		3%	13.87%	16.22%
02-04-2023	0	0.00	0.00	8854	71.30	12890.20	0	65.38	578930.74	2495000	65.38	16891657.70	314	73.50		3%	13.87%	16.22%
03-04-2023	140500	74.76	10503466.00	10839	75.81	73249.00	0	65.38	578930.74	2495000	65.38	16891657.70	103	72.20		3%	13.87%	16.22%
04-04-2023	0	0.00	0.00	16839	74.40	50354.00	0	65.38	578930.74	2495000	65.38	16891657.70	932	72.90		3%	13.87%	16.22%
05-04-2023	0	0.00	0.00	43043	72.19	97234.00	0	68.91	2826391.72	232661	68.91	15211802.30	152	74.10		3%	13.87%	16.22%
06-04-2023	0	0.00	0.00	30118	71.77	61663.80	0	68.91	2826391.72	232661	68.91	15211802.30	102	74.00		3%	13.87%	16.22%
11-04-2023	43149	67.94	2931858.10	0	0.00	0.00	0	68.91	2826391.72	232661	68.91	15211802.30	138	71.30		3%	13.87%	16.22%
12-04-2023	151850	70.31	10676795.00	68314	70.07	86794.00	0	69.29	4731336.92	385685	69.29	26723322.43	141	68.20		3%	13.87%	16.22%
13-04-2023	80979	72.40	5859083.80	0	0.00	0.00	0	69.29	4731336.92	385685	69.29	26723322.43	287	72.80		3%	13.87%	16.22%
17-04-2023	0	0.00	0.00	18194	72.81	26689.70	0	69.83	1270438.30	438470	69.83	32582406.23	117	73.20		3%	13.87%	16.22%
25-04-2023	121034	76.40	9246584.20	60000	73.17	60419.20	0	69.83	1270438.30	438470	69.83	32582406.23	349	73.20		3%	13.87%	16.22%
27-04-2023	0	0.00	0.00	121034	75.14	60589.80	0	71.48	4283507.27	422925	71.48	30200025.85	196	72.70		3%	13.87%	16.22%
02-05-2023	267229	74.34	19865635.80	102500	77.47	78452.10	0	71.48	4283507.27	422925	71.48	30200025.85	216	74.70		3%	13.87%	16.22%
03-05-2023	62004	77.14	4784396.30	25000	78.83	72500.00	0	72.82	2464149.33	466220	72.82	43950592.21	431	73.70		3%	13.87%	16.22%
07-05-2023	63625	76.34	4854991.70	0	0.00	0.00	0	73.33	1833199.03	503224	73.33	30900389.80	173	75.60		3%	13.87%	16.22%
08-05-2023	113114	81.29	9194424.60	93499	81.41	11667.90	0	74.93	7046317.09	566849	74.93	41757381.20	322	77.10		3%	13.87%	16.22%
09-05-2023	90628	82.60	7485537.20	421246	81.15	184549.00	0	74.93	7046317.09	566849	74.93	41757381.20	152	81.20		3%	13.87%	16.22%
16-05-2023	21568	77.00	810736.00	0	0.00	0.00	0	75.96	3199557.62	585465	75.96	193538608.54	106	80.70		3%	13.87%	16.22%
22-05-2023	30000	86.32	2589538.50	49000	80.00	20000.00	0	76.01	870246.36	234847	76.01	20249444.94	117	70.40		3%	13.87%	16.22%
24-05-2023	15000	86.80	1302000.00	0	0.00	0.00	0	77.09	3177544.43	235847	77.09	19182092.26	51	81.00		3%	13.87%	16.22%
25-05-2023	200000	80.00	16000000.00	32000	87.15	88775.00	0	78.71	2518572.73	418847	78.71	19484092.26	139	86.20		3%	13.87%	16.22%
28-05-2023	11700	84.50	2619500.00	0	0.00	0.00	0	78.71	2518572.73	418847	78.71	19484092.26	105	86.30		3%	13.87%	16.22%
29-05-2023	500	88.80	44400.00	0	0.00	0.00	0	79.12	7115.48	49947	79.12	35629419.55	154	90.30		3%	13.87%	16.22%
01-06-2023	0	0.00	0.00	1000	92.60	2600.00	0	79.12	7115.48	49947	79.12	35629419.55	50	89.40		3%	13.87%	16.22%
06-06-2023	0	0.00	0.00	142848	101.80	142848.00	0	79.12	11501448.24	306499	79.12	24248815.89	194	94.00		3%	13.87%	16.22%
07-06-2023	25000	93.00	2325000.00	57152	97.69	43059.00	0	80.16	4581451.00	243447	80.16	21992363.93	180	101.80		3%	13.87%	16.22%

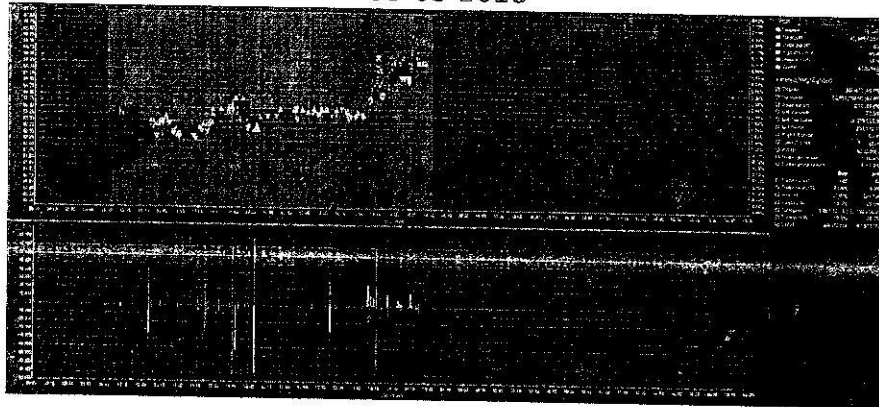
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By Trade monitoring screenshots of Mohammad Shamsul Alam and associates (control market):

The Investigation Team of IED collected Trade monitoring screenshots from the Surveillance Department of DSE on some trading date(s) where appearance of active trading of Mohammad Shamsul Alam and associates were observed which influenced to uplift the price of shares of 'FINEFOODS' during the investigation period.

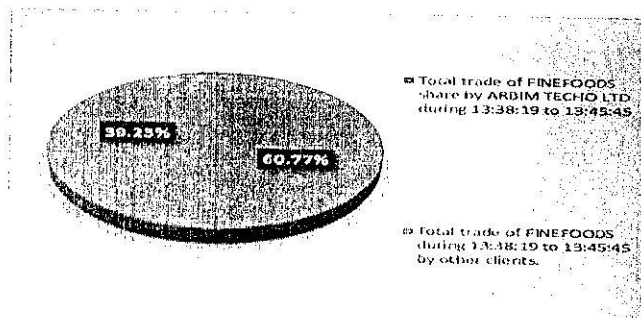
BOID: 1203510068173076, 1201820068895861, 1205720075603052,
 1203510066591329, 1602170066475452, 1203510068907832 (combined)

05-03-2023



It was observed in the above graph that on 05-03-2023, total number of trades of FINEFOODS in the market was 682, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 146 which is approximately 21.41% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 721,578 whereas buy volume by the said client(s) was 137,010 which is approximately 18.99% of the total traded volume in the market.

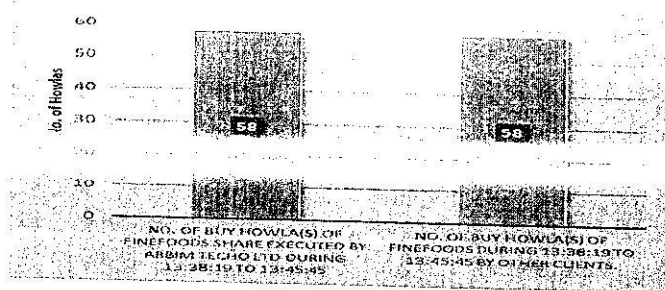
On 05-03-2023, trading of FINEFOODS share was started at Tk. 63.30 which is Tk. 1.10 more than the YCP of Tk. 62.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 13:38:19 at price Tk. 63.50 and induced the same to rise to Tk. 64.80 up to 13:45:45. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates bought 73,352 shares of FINEFOODS compared to the total traded share of 120,709. This is shown in the following Pie Chart.



AS

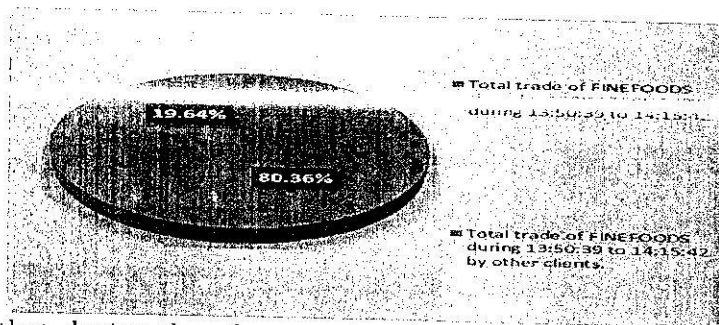
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It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 58 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.

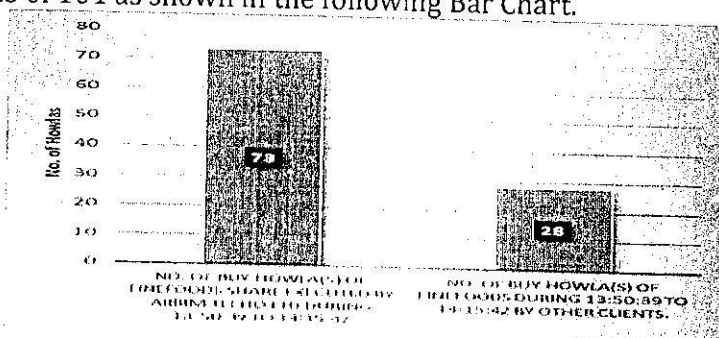


It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 60.77% of the total trades of FINEFOODS shares by executing 58 of total 116 howlas from 13:38:19 to 13:45:45 on 05-03-2023. From 13:38:19 to 13:45:45, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 63.50 to Tk. 64.80 (induced the price by Tk. 1.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share.

Besides, on that day, Mohammad Shamsul Alam and associates started series of trading at 13:50:39 at price Tk. 64.10 and induced the same to rise to Tk. 66.40 up to 14:15:42. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 13:50:39 to 14:15:42, Mohammad Shamsul Alam and associates bought 51,139 shares of FINEFOODS compared to the total traded share of 63,638. This is shown in the following Pie Chart.

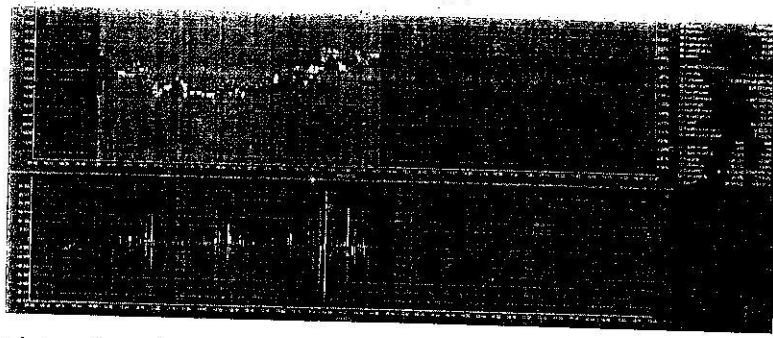


It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 73 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 101 as shown in the following Bar Chart.



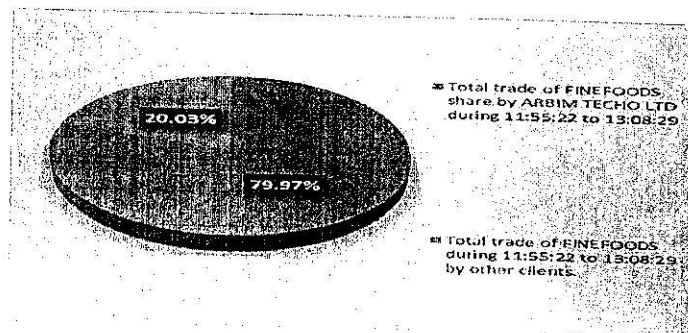
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associates bought 80.36% of the total trades of FINEFOODS shares by executing 73 of total 101 howlas from 13:50:39 to 14:15:42 on 05-03-2023. From 13:50:39 to 14:15:42, Mohammad Shamsul Alam and associates induced the price of FINEFOODS share to rise from Tk. 64.40 to Tk. 66.40 (induced the price by Tk. 2.30). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 3.10 which is approximately 4.98% higher than YCP.



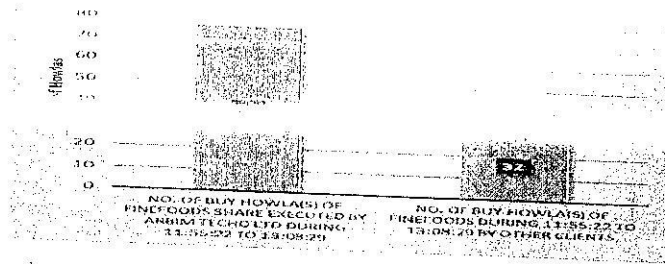
It was observed in the above graph that on 12-03-2023, total number of trades of FINEFOODS in the market was 698, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 202 which is approximately 28.94% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 361,964 whereas buy volume by the said client(s) was 124,584 which is approximately 34.42% of the total traded volume in the market. It is evident that the client had significant participation in the market on 12-03-2023 in trading of FINEFOODS share.

On 12-03-2023, trading of FINEFOODS share was started at Tk. 66.80 which is Tk. 1.50 more than the YCP of Tk. 65.30. On that day, Mohammad Shamsul Alam and associates started series of trading at 11:55:22 at price Tk. 64.60 and induced the same to rise to Tk. 65.90 up to 13:08:29. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 11:55:22 to 13:08:29, Mohammad Shamsul Alam and associates bought 50,377 shares of FINEFOODS compared to the total traded share of 62,995. This is shown in the following Pie Chart.



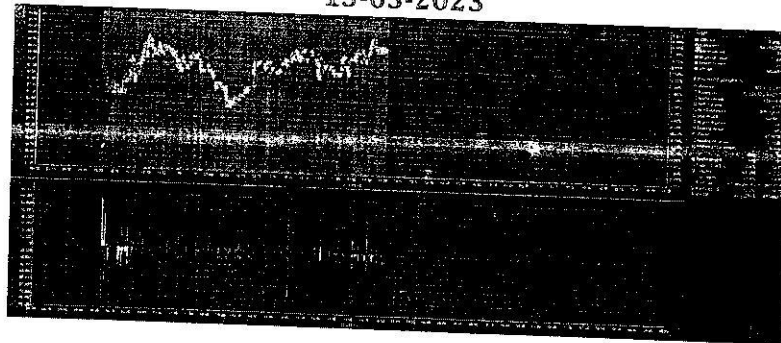
It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 77 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 109 as shown in the following Bar Chart.

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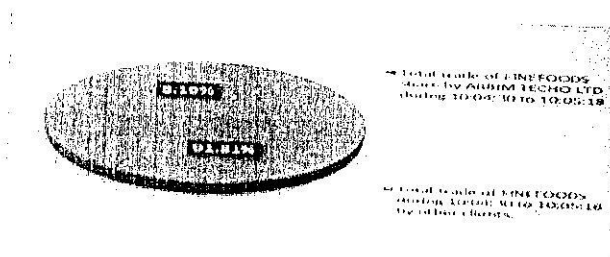
It is observed from the above graph that on 12-03-2023, Muhammad Shamsul Alam and associates bought 79.97% of the total trades of FINEFOODS shares by executing 77 of total 109 howlas from 11:55:22 to 13:08:29 on 12-03-2023. From 11:55:22 to 13:08:29, Muhammad Shamsul Alam and associates induced the price to rise from Tk. 64.60 to Tk. 65.90 (induced the price by Tk. 1.30). Thus it seems that Muhammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 1.40 which is approximately 2.14% higher than YCP.

13-03-2023



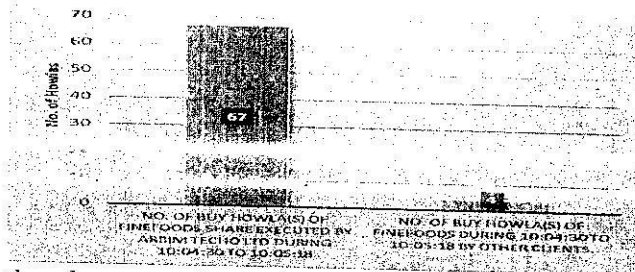
It was observed in the above graph that on 13-03-2023, total number of trades of FINEFOODS in the market was 1841, whereas number of trades (buy) executed by Muhammad Shamsul Alam and associates was 112 which is approximately 6.11% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 1,208,313 whereas buy volume by the said client(s) was 149,504 which is approximately 12.37% of the total traded volume in the market.

On 13-03-2023, trading of FINEFOODS share was started at Tk. 65.60 which is Tk. 1.10 less than the YCP of Tk. 66.70. On that day, Muhammad Shamsul Alam and associates started series of trading at 10:04:30 at price Tk. 67.30 and induced the same to rise to Tk. 67.70 up to 10:05:18. It can also be observed from the above graph that Muhammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 10:04:30 to 10:05:18, Muhammad Shamsul Alam and associates bought 71,722 shares of FINEFOODS compared to the total traded share of 78,122. This is shown in the following Pie Chart.



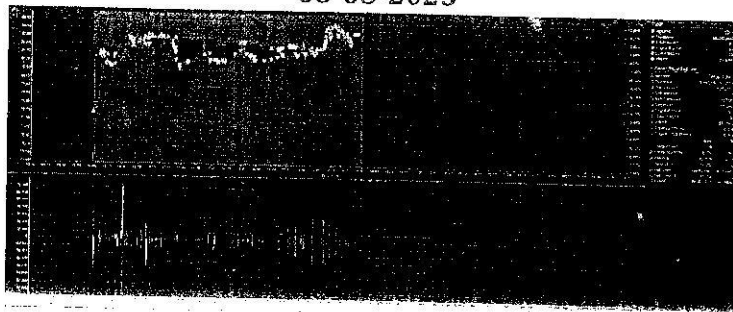
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associates executed 67 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 71 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 91.81% of the total trades of FINEFOODS shares by executing 67 of total 71 howlas from 10:04:30 to 10:05:18 on 13-03-2023. From 10:04:30 to 10:05:18, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 67.30 to Tk. 67.70 (induced the price by Tk. 0.40). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 2.10 which is approximately 3.15% higher than YCP.

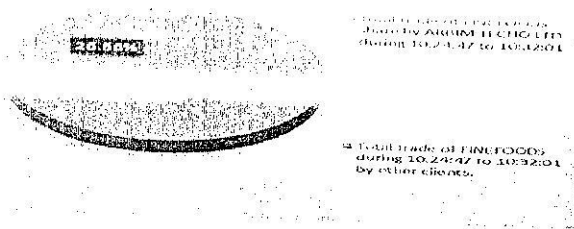
08-05-2023



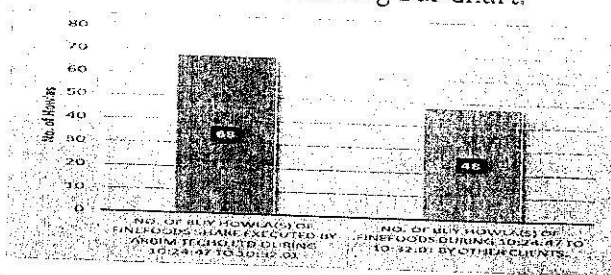
It was observed in the above graph that on 08-05-2023, total number of trades of FINEFOODS in the market was 1112, whereas number of trades (buy) executed by Mohammad Shamsul Alam and associates were 74 which is approximately 6.65% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 831,479 whereas buy volume by the said client(s) was 93,114 which is approximately 11.20% of the total traded volume in the market.

On 08-05-2023, trading of FINEFOODS share was started at Tk. 78.00 which is Tk. 3.20 less than the YCP of Tk. 81.20. On that day, Mohammad Shamsul Alam and associates started series of trading at 10:24:47 at price Tk. 81.30 and induced the same to rise to Tk. 82.50 up to 10:32:01. It can also be observed from the above graph that Mohammad Shamsul Alam and associates executed significant trades during this time period. It is mentionable here that from 10:24:47 to 10:32:01, Mohammad Shamsul Alam and associates bought 90,414 shares of FINEFOODS compared to the total traded share of 123,115. This is shown in the following Pie Chart.

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It is also found that during the aforementioned period, Mohammad Shamsul Alam and associates executed 68 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 116 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mohammad Shamsul Alam and associates bought 73.44% of the total trades of FINEFOODS shares by executing 68 of total 116 howlas from 10:24:47 to 10:32:01 on 08-05-2023. From 10:24:47 to 10:32:01, Mohammad Shamsul Alam and associates induced the price to rise from Tk. 81.30 to Tk. 82.50 (induced the price by Tk. 1.20). Thus it seems that Mohammad Shamsul Alam and associates were actively trying to lift the price of FINEFOODS share. At the end of the day price of FINEFOODS share was increased by Tk. 1.60 which is approximately 1.97% higher than YCP.

Summary of the trade by Mohammad Shamsul Alam and associates:

Block Buy		Block Sale		Summary												
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	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
760735	74.05	56334996.00	7E+03	72.45	47287712.10	2,562,695.00	72.13	184845331.30	3,662,078.00	73.56	269391374.90	67.62	247636564.99	274347	80.16	21992363.93

d. Gain and Loss by Mohammad Shamsul Alam and associates from 02.03.2023 to 07.06.2023:

Realized Capital gain(loss) per unit	5.94	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	8.78%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	21,754,709.91	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (07-06-2023)	108.30	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	28.14	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	35.10%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	7,719,416.17	Quantity of Stock Position x Unrealized gain (loss) per unit

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bought 2562695 shares and sold 3662078 shares of FINEFOODS from public market during the period from 02-03-2023 to 07-06-2023. With the said BO accounts, realized a capital gain/loss of Tk. 21754709.91 from the trading of FINEFOODS share during the investigation period. They had also unrealized gain/loss of TK. 7719416.17 during the period.

Findings:-

As per section 17 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 an appearance of active trading therein or of raising of price for the purpose of including its purchase by others or depressing its price for the purpose of inducing its sale by others;"

It is evident that **Mohammad Shamsul Alam and associates** were involved directly and indirectly in a series of transactions of shares of 'FINEFOODS' with their aforesaid BO accounts in order to create an appearance of active trading and raising of price of the said share.

Contravention(s)-1:

Mohammad Shamsul Alam and associate(s) have violated the following:

Section 17 (e)(v) of the Securities and Exchange Ordinance, 1969 by directly and indirectly effecting a series of transactions of shares of "FINEFOODS" creating an appearance of active trading therein and raising price of the said share.

Observation-2:

After analyzing the trade pattern of the clients, the investigation team found that MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), SAJIYA JASMIN (BOID: 1602170066475452) and SULTANA PARVIN (BOID: 1203510068907832) were involved in trading in shares of "FINEFOODS" within the investigation period and these accounts are acting as counter party of each other for **237125** shares of "FINEFOODS" in 58 howlas in both the public and block market during the investigation period. Detail of the above mentioned trade is as follows:

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TRADE DATE	TRADE TIME	HOWLA NO	INSTRUMENT CODE	TRADE VOLUME	TRADE PRICE	BUYER CODE	BUYER CLIENT	BOID BUYER	SELLER CODE	SELLER CLIENT	BOID SELLER	MARKET TYPE
28-03-23	11:28:32	279959948	FINEFOODS	2000	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959949	FINEFOODS	2000	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:28:32	279959950	FINEFOODS	1005	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:28:41	279959975	FINEFOODS	995	71.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:52:31	283924418	FINEFOODS	158	81	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:52:34	283924444	FINEFOODS	500	81	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:52:36	283924474	FINEFOODS	1000	81	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963310	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963320	FINEFOODS	1769	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963321	FINEFOODS	231	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963327	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963334	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:41:46	279963340	FINEFOODS	919	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	11:42:04	279963402	FINEFOODS	1051	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
28-03-23	12:01:23	279967884	FINEFOODS	2000	71	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:36:59	283915856	FINEFOODS	3211	81.3	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:36:59	283915857	FINEFOODS	1789	81.3	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
16-05-23	12:59:29	283928406	FINEFOODS	1900	81.5	DSEEPS	HO344	1201820068895861	DSEESBL	22232	1203510068173076	Public
12-04-23	10:50:05	281119325	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
12-04-23	10:50:11	281119382	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
12-04-23	10:50:11	281119383	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
12-04-23	10:50:11	281119384	FINEFOODS	1000	69.7	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
12-04-23	10:50:11	281119385	FINEFOODS	900	69.7	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
12-04-23	10:50:16	281119435	FINEFOODS	900	69.8	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
12-04-23	10:50:16	281119437	FINEFOODS	100	69.8	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
07-03-23	10:55:21	278779320	FINEFOODS	1000	64.9	DSEESBL	22232	1203510068173076	DSEESBL	22232	1203510068173076	Public
09-03-23	14:18:40	278985394	FINEFOODS	2750	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985395	FINEFOODS	3000	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985396	FINEFOODS	3000	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:18:40	278985397	FINEFOODS	1250	66	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
09-03-23	14:10:07	278976832	FINEFOODS	30000	65	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
29-03-23	12:00:47	280044729	FINEFOODS	83168	70	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Public
07-06-23	10:07:08	287291682	FINEFOODS	25000	93	DSEESBL	22232	1203510068173076	DSEESBL	22246	1203510068907832	Block
02-03-23	12:29:00	278428191	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428193	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428194	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428195	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428196	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428197	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428198	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428199	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
02-03-23	12:29:00	278428200	FINEFOODS	1000	59.6	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	12:04:01	278807613	FINEFOODS	1000	65.8	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	12:04:44	278807862	FINEFOODS	1000	65.8	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	12:08:10	278808932	FINEFOODS	800	65.8	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	10:41:47	278771482	FINEFOODS	5000	64.2	DSEESBL	22246	1203510068907832	DSEESBL	22232	1203510068173076	Public
07-03-23	14:18:55	278870326	FINEFOODS	1796	67.3	DSEESBL	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:37	279065317	FINEFOODS	1750	67	DSEESBL	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:41	279065325	FINEFOODS	5000	67	DSEESBL	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:45	279065360	FINEFOODS	5000	67	DSEESBL	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
12-03-23	13:41:49	279065371	FINEFOODS	5000	67	DSEESBL	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
13-03-23	13:32:25	279161748	FINEFOODS	10350	68.2	DSEESBL	04008	1205720075603052	DSEESBL	22232	1203510068173076	Public
09-03-23	14:16:32	278982617	FINEFOODS	3000	66	DSEESBL	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985899	FINEFOODS	1660	66	DSEESBL	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985900	FINEFOODS	3000	66	DSEESBL	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public
09-03-23	14:19:03	278985901	FINEFOODS	226	66	DSEESBL	04008	1205720075603052	DSEESBL	22246	1203510068907832	Public

TOTAL HOWLA NO: 58

TOTAL TRADE VOLUME: 237125

(DSE trade data)

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Findings:

As per section 17 of the Securities and Exchange Ordinance, 1969 (XVII of 1969), "No person shall for the purpose of inducing, dissuading, affecting, 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-

(ii) create a false and misleading appearance of active trading in any securities;"

It is found that associates of Mohammad Shamsul Alam and associates acted as counter party of each other for 237125 shares of "FINEFOODS" in 58 howlas in both the public and block market during the investigation period.

Contravention(s)-2:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), SAJIYA JASMIN (BOID: 1602170066475452) and SULTANA PARVIN (BOID: 1203510068907832) have violated the following:

- Section 17(e)(ii) of Securities and Exchange Ordinance, 1969 by executing trades that created a false and misleading appearance of active trading in securities.

Observation-3:

As per the DSE trade data, it was observed that Mohammad Shamsul Alam and associates had collectively acquired more than 10% shares of "FINEFOODS" during the investigation period. Details are given below:

Shareholding position of Mohammad Shamsul Alam and associates:

Sl. No	Client Name	BOID	Name of TREC Holder	Opening Balance	05-03-2023		06-03-2023		07-03-2023		09-03-2023		12-03-2023		13-03-2023	
					Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%	Total Qty	%
1	ARBIM TECO LTD	1201820068895861	BRACEPL Stock Brokerage Limited	160000	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	160000	1.14%	149329	1.07%
2	AAA AGRO ENTERPRISE	1205720075603052	NLI Securities Limited	829154	848898	6.07%	896565	6.42%	896615	6.42%	897262	6.42%	920894	6.59%	920894	6.59%
3	MOHAMMAD SHAMSUL ALAM	1203510068173076	Stock & Bond Limited	260981	308275	2.21%	311901	2.23%	289177	2.07%	324494	2.32%	291455	2.09%	261031	1.87%
4	MOHAMMED JAHANGIR ALAM	120351006889329	Stock & Bond Limited	8300	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%	8300	0.06%
5	SULTANA PARVIN	1203510068907832	Stock & Bond Limited	115295	115677	0.83%	115677	0.83%	104038	0.74%	87592	0.63%	88583	0.63%	88583	0.63%
Total holding of FINEFOODS by the aforesaid clients during the investigation period					1441150	10.31%	1492443	10.68%	1458130	10.43%	1477648	10.57%	1469232	10.51%	1428137	10.22%
Total No. of Outstanding Securities of FINEFOODS				13,973,918												

(DSE Trade data)

jointly hold more than 10% of the total paid up shares of FINEFOODS.

As per উপ-বিধি (১) (ক) of বিধি ২ of the বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

“..... (১) বিষয় বা প্রসঙ্গের পরিপন্থী কোন কিছু মা থাকিলে, এই বিধিমালায়, (ক) “অধিগ্রহণকারী” অর্থ এমন কোন ব্যক্তি যে সিজি বা অন্য কাহারো সহিত সম্মিলিত হইয়া (persons acting in concert) কোন কোম্পানির ভোটাধিকারযুক্ত শেয়ার অথবা ভোটাধিকারযুক্ত শেয়ারে রূপান্তরযোগ্য সিকিউরিটিজ অধিগ্রহণ করে বা উহার জন প্রস্তাব করে.....”

As per বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

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

However, it is found that **Mohammad Shamsul Alam and associates** jointly hold more than 10% shares of 'FINEFOODS' on the aforesaid dates.

Contravention(s)-3:

MOHAMMAD SHAMSUL ALAM (BOID: 1203510068173076), ARBIM TECO LTD. (BOID # 1201820068895861), AAA AGRO ENTERPRISE (BOID: 1205720075603052), MOHAMMED JAHANGIR ALAM (BOID: 1203510066591329) and SULTANA PARVIN (BOID: 1203510068907832) have violated the following:

- বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by acquiring more than 10% shares of “FINEFOODS” without complying the requirements of the said rules.

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A. Trade Details of MOHAMMAD SHAMSUL ALAM:

a) Individual Trade Patterns of Mohammad Shamsul Alam (Only Public Market):

Date	Code # 22232				Total					
	BO ID # 1203510068173076				MOHAMMAD SHAMSUL ALAM					
	Stock & Bond Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Total	Sale Qty	Rate (W.Avg.)	Total
02-03-2023	12931	61.67	12970	60.33	12931	61.67	797490.80	12970	60.33	782476.00
05-03-2023	7081	65.52	59787	63.05	7081	65.52	463952.20	59787	63.05	3769433.90
06-03-2023	16611	65.05	12985	64.96	16611	65.05	1080485.50	12985	64.96	843525.00
07-03-2023	41300	66.05	64024	66.00	41300	66.05	2727914.50	64024	66.00	4225793.40
09-03-2023	50485	65.26	15168	68.72	50485	65.26	3294547.30	15168	68.72	1042359.00
12-03-2023	6961	66.54	40000	66.99	6961	66.54	463154.20	40000	66.99	2679630.00
13-03-2023	975	67.84	31399	68.54	975	67.84	66140.00	31399	68.54	2152063.30
15-03-2023	0	0.00	92537	66.00	0	0.00	0.00	92537	66.00	6107371.00
19-03-2023	6563	66.76	0	0.00	6563	66.76	438114.00	0	0.00	0.00
23-03-2023	0	0.00	32551	73.89	0	0.00	0.00	32551	73.89	2405293.70
27-03-2023	0	0.00	19309	73.35	0	0.00	0.00	19309	73.35	1416337.90
28-03-2023	0	0.00	76371	70.85	0	0.00	0.00	76371	70.85	5411213.40
29-03-2023	0	0.00	31101	71.73	0	0.00	0.00	31101	71.73	2230884.60
02-04-2023	0	0.00	8854	71.30	0	0.00	0.00	8854	71.30	631290.20
03-04-2023	0	0.00	16839	75.61	0	0.00	0.00	16839	75.61	1273249.00
05-04-2023	0	0.00	43043	72.19	0	0.00	0.00	43043	72.19	3107234.60
06-04-2023	0	0.00	30118	71.77	0	0.00	0.00	30118	71.77	2161663.80
11-04-2023	30649	68.00	0	0.00	30649	68.00	2084158.10	0	0.00	0.00
12-04-2023	84545	70.63	0	0.00	84545	70.63	5971064.80	0	0.00	0.00
16-04-2023	0	0.00	18194	72.81	0	0.00	0.00	18194	72.81	1324689.70
17-04-2023	0	0.00	60000	75.14	0	0.00	0.00	60000	75.14	4508589.80
25-04-2023	0	0.00	60000	75.14	0	0.00	0.00	60000	75.14	4508589.80
02-05-2023	20999	74.90	0	0.00	20999	74.90	1572881.00	0	0.00	0.00
09-05-2023	0	0.00	999	80.70	0	0.00	0.00	999	80.70	80619.30
16-05-2023	0	0.00	120000	80.98	0	0.00	0.00	120000	80.98	9717799.50
22-05-2023	0	0.00	11568	82.00	0	0.00	0.00	11568	82.00	948576.00
01-06-2023	0	0.00	1000	92.60	0	0.00	0.00	1000	92.60	92600.00
Total	279100		805817		279100			805817		

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b) Effects of "FINEFOODS" at DSE in both public and block market by Mohammad Shamsul Alam

Date	Buy			Sale			Cost of shares sold			Stock Position			Market Client Buy (%)	Market Client Sale (%)	Market Price Change
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount			
05-03-2023	12931	61.67	797490.80	12970	60.33	782471.00	0	61.63	799402.38	260981	61.63	16085000.30	61	2.3	1.23
06-03-2023	107981	61.49	6583952.20	59787	63.05	376941.90	0	61.59	3682363.21	308236	61.59	18984677.40	61	4.18	1.33
07-03-2023	16611	65.05	1080485.50	12985	64.96	84352.00	0	61.77	802058.02	311862	61.77	19263104.19	61	0.22	1.23
08-03-2023	41300	66.05	2727914.50	64024	66.00	422579.40	0	62.27	3986705.89	289138	62.27	18004313.50	61	3.15	1.23
09-03-2023	50485	65.26	3294547.30	15168	68.72	104235.00	0	62.79	951234.52	324455	62.71	20347626.18	61	2.54	1.23
12-03-2023	6961	66.54	463154.20	40000	66.99	267963.00	0	62.81	1972181.99	291416	62.79	18299039.79	61	2.4	1.23
13-03-2023	975	67.84	66140.00	31399	68.54	215206.30	0	62.81	1972181.99	260992	62.81	16392997.30	61	3.5	1.23
15-03-2023	0	0.00	0.00	92537	66.00	610737.00	0	62.81	5812280.80	168455	62.81	10580716.10	61	3.40	1.23
19-03-2023	6563	66.76	438114.00	0	0.00	0.00	0	0.00	0.00	175018	62.96	11018830.50	61	2.07	1.23
23-03-2023	0	0.00	0.00	32551	73.89	240529.70	0	62.96	2049354.65	142467	62.96	8969475.81	61	2.68	1.23
27-03-2023	0	0.00	0.00	19309	73.35	141633.90	0	62.96	1215661.24	123158	62.96	7753814.61	72	1.10	1.23
28-03-2023	0	0.00	0.00	76371	70.85	541121.40	0	62.96	4806186.04	46787	62.96	2945628.53	72	1.43	1.23
29-03-2023	83168	70.00	5821760.00	31101	71.73	223088.60	0	67.46	2098222.86	98854	67.46	6669165.7	72	3.969	1.23
02-04-2023	0	0.00	0.00	8854	71.30	63129.20	0	67.46	597333.37	90000	67.46	6071832.3	72	0.77	1.23
03-04-2023	0	0.00	0.00	16839	75.61	127324.00	0	67.46	1136039.83	73161	67.46	4935792.51	72	1.59	1.23
05-04-2023	0	0.00	0.00	43043	72.19	310723.60	0	67.46	2903887.55	30118	67.46	2031904.9	72	3.559	1.23
06-04-2023	30649	68.00	2084158.10	0	0.00	0.00	0	67.46	2031904.96	0	0.00	0.00	71	0.00%	1.23
11-04-2023	84545	70.63	5971064.80	0	0.00	0.00	0	0.00	0.00	30649	68.00	2084158.10	71	0.00%	1.23
12-04-2023	0	0.00	0.00	18194	72.81	132468.70	0	69.93	1272260.06	115194	69.93	8055222.91	71	1.169	1.23
16-04-2023	0	0.00	0.00	7000	72.80	509611.40	0	69.93	489492.16	97000	69.93	6782962.8	66	6.74%	1.23
17-04-2023	0	0.00	0.00	60000	75.14	450858.80	0	69.93	4195647.12	90000	69.93	6293470.61	72	0.00%	1.23
25-04-2023	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	30000	69.93	2097823.50	73	0.00%	1.23
02-05-2023	20999	74.90	1572881.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	72	1.379	1.23
07-05-2023	50000	75.00	3750000.00	0	0.00	0.00	0	0.00	0.00	59999	71.98	3670704.5	74	2.239	1.23
08-05-2023	20000	78.00	1560000.00	0	0.00	0.00	0	0.00	0.00	100999	73.47	7420704.5	74	5.88%	1.23
09-05-2023	0	0.00	0.00	999	80.70	80619.0	0	74.22	74147.09	120999	74.22	8980704.5	75	5.32%	1.23
16-05-2023	0	0.00	0.00	120000	80.98	971779.50	0	74.22	8906557.47	120000	74.22	8906557.47	81	1.97%	1.23
18-05-2023	11568	77.00	890736.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	80	2.32%	1.23
22-05-2023	0	0.00	0.00	11568	82.00	948576.0	0	77.00	890736.00	11568	77.00	890736.00	79	0.00%	1.23
28-05-2023	31000	84.50	2619500.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	79	12.24%	1.23
01-06-2023	0	0.00	0.00	1000	92.60	92600.0	0	84.50	84500.00	31000	84.50	2619500.00	81	2.79%	1.23
07-06-2023	25000	93.00	2325000.00	0	0.00	0.00	0	84.50	84500.00	30000	84.50	2535000.00	83	3.35%	1.23
Total	599836	70.10	42046898.40	8085817	71.26	5742230.50	0	66.11	53271898.40	55000	88.36	4860000.00	100	7.22%	0.00%

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অতএব জনাব, Mr. Mohammad Shamsul Alam-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন থেকে প্রতীয়মান হয় যে, তাঁর বিরুদ্ধে প্রযোজ্য অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হওয়ার ঝুঁকি রয়েছে।

Mr. Mohammad Shamsul Alam-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন থেকে প্রতীয়মান হয় যে, তাঁর বিরুদ্ধে প্রযোজ্য অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হওয়ার ঝুঁকি রয়েছে।

যেহেতু, Mr. Mohammad Shamsul Alam উপর্যুক্ত কর্মকান্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ও Section 17(e)(v) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ৪(১) লংঘন করেছেন;

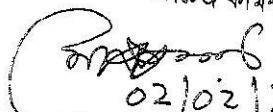
যেহেতু, Mr. Mohammad Shamsul Alam-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mr. Mohammad Shamsul Alam-কে অর্থদন্ডে 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 [যা The Securities and Exchange (Amendment) Act, 2000 দ্বারা সংশোধিত] এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ এ প্রদত্ত ক্ষমতাবলে-

- Mr. Mohammad Shamsul Alam-কে মোট ৩৭.৫০ (সাতত্রিশ দশমিক পঞ্চাশ) লক্ষ টাকা অর্থদন্ডে দণ্ডিত করল যা তিন মাসের মধ্যে (৩০ দিনের) মধ্যে প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যাবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


02/02/2020
মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। Mr. Mohammad Shamsul Alam
(BOID: 1203510068173076)
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