

**Bangladesh Securities and Exchange Commission**

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৩৩৩/২০২২/৪৯২

তারিখঃ ২৯ মে ২০২৪

**Mr. Md. Saif Ullah**

(BOID: 1605170064096113, City Bank Capital Resources Limited)

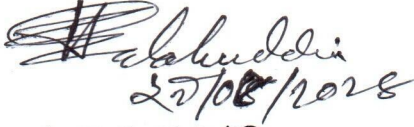
House No. 34, Road No. 04, Block- C

Banasree, Rampura, Dhaka

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৩৩৩/২০২২/৪৯১ তারিখঃ ২৯ মে ২০২৪ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহনের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,



মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

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

ই-মেইল- [ssuddin@sec.gov.bd](mailto:ssuddin@sec.gov.bd)

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু কমিশনার, এনফোর্সমেন্ট, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমএসআই, বিএসইসি [BSEC/MSI/2021-1000]।
৫. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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## 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, সেপ্টেম্বর ০৬, ২০২১ তারিখের Surveillance Note-52/2021 অনুযায়ী এবং Regulation 16(3)(c)(ii) and (d)(v) of Dhaka Stock Exchange (Board and Administration) Regulations, 2013 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ১৭.০৮.২০২১ থেকে ৩১.০৮.২০২১ পর্যন্ত সময়কালে Janata Insurance Company Limited (JANATAINS)-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:

### I. Major buyers of the period:

The price of shares of "JANATAINS" was increased by Tk. 39.00 to 62.90 which was increased by 61.28% for the period 17.08.2021 to 31.08.2021. The list of major buyers of the period is as follows:

Sl No.	Client Code	Client Name	BO ID	Name of TREC Holder/DP	Buy Quantity	Sell Quantity	Total Trade	Total Trade Volume in the market	% of total Trade
1	CM411	Md. Saif Ullah	1605170064096113	City Bank Capital Resources Ltd.	8885836	4904241	13790077	25058108	55.03%
2	CM529	Md. A.G. Mahmud	1605170069260129	City Bank Capital Resources Ltd.	1834864	1697712	3532576	25058108	14.10%
3	CN392	Younus Paper Mills Ltd.	1605170073803941	City Bank Capital Resources Ltd.	1092914	0	1092914	25058108	4.36%
4	CN330	Paramount Insurance Company Ltd.	1605170071960776	City Bank Capital Resources Ltd.	496375	0	496375	25058108	1.98%
5	41999	Nur -E- Alam	1201950062070101	EBL Securities Ltd.	456417	371417	827834	25058108	3.30%
6	44561	S.M. Mahbubur Rahman	1201510000117260	Shakil Rizvi Stock Ltd.	430000	290000	720000	25058108	2.87%
7	CM521	Hasina Akter	1605170069219894	City Bank Capital Resources Ltd.	400000	154790	554790	25058108	2.21%
8	13065	Sharmin Akhter	1201750068184225	CMSL Securities Ltd.	282345	205945	488290	25058108	1.95%
9	1704	Ms. Maksuda Begum	1201470000421791	Mona Financial Consultancy & Securities Ltd.	277469	226364	503833	25058108	2.01%
10	000060	A.K.M. Anwarul Haq	1203040004149541	Md. Fakhru Islam Securities Ltd.	256292	339204	595496	25058108	2.38%
11	A16449	Md. Nazib Mahmud Shajib	1201830062258465	LANKABANGLA Securities Ltd.	181000	140000	321000	25058108	1.28%
12	IM040	Ok Enterprise (Pvt) Ltd.	1205590032799697	UCB Stock Brokerage Ltd.	170000	371350	541350	25058108	2.16%
13	CM417	Md. Lockman Hossain	1605170067427987	City Bank Capital Resources Ltd.	169501	0	169501	25058108	0.68%
14	03275	Mr Mohammad Mohiuddin Ahmed	1201750001706262	CMSL Securities Ltd.	156900	85200	242100	25058108	0.97%
15	4192	Md. Emdadul Haque	1204490043251166	Bank Asia Securities Ltd.	150326	55326	205652	25058108	0.82%

### Findings:

- It was observed that Mr. Md. Saif Ullah (Client code # CM411 of City Bank Capital Resources Ltd.) was the top buyer of shares of "JANATAINS" for the period from 17.08.2021 to 31.08.2021. He was associated with the following clients in trading of the shares of "JANATAINS" during the investigation period:
- His brother Mr. Md. A.G. Mahmud, the 2nd top buyer (Client code # CM529 of City Bank Capital Resources Ltd.)
  - His sister Ms. Hasina Akter, the 7th top buyer (Client code # CM521 of City Bank Capital Resources Ltd.)

However, with the aforementioned 3 (three) accounts, they jointly traded 71.34% shares of "JANATAINS" during the investigation period.

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## II. Major sellers of the period:

The list of major sellers of share of "JANATAINS" for the period 17.08.2021 to 31.08.2021 is as follows:

Sl No.	Client Code	Client Name	BO ID	Name of TREC Holder	Buy Quantity	Sell Quantity	Total Trade	Total Trade Volume in the market	% of total Trade
1	CM411	Md. Saif Ullah	1605170064096113	City Bank Capital Resources Ltd.	8885836	4904241	13790077	25058108	55.03%
2	CM529	Md. A.G. Mahmud	1605170069260129	City Bank Capital Resources Ltd.	1834864	1697712	3532576	25058108	14.10%
3	1177	Mrs. Afreen Howlader	1205950069153825	NRBC Bank Securities Ltd.	10000	424845	434845	25058108	1.74%
4	41999	Nur -E- Alam	1201950062070101	EBL Securities Ltd.	456417	371417	827834	25058108	3.30%
5	IM040	Ok Enterprise (Pvt) Ltd.	1205590032799697	UCB Stock Brokerage Ltd.	170000	371350	541350	25058108	2.16%
6	000060	A.K.M. Anwarul Haq	1203040004149541	Md. Fakhru Islam Securities Ltd.	256292	339204	595496	25058108	2.38%
7	44561	S.M. Mahbubur Rahman	1201510000117260	Shakil Rizvi Stock Ltd.	430000	290000	720000	25058108	2.87%
8	A0299	PfcmI-I/A:A0299	1604420046901385	Prime Finance Capital Management Ltd.	0	273000	273000	25058108	1.09%
9	RAJ3382	Mst. Israt Jahan	1203100070177244	ICB Securities Trading Co. Ltd.	0	253939	253939	25058108	1.01%
10	1704	Ms. Maksuda Begum	1201470000421791	Mona Financial Consultancy & Securities Ltd.	277469	226364	503833	25058108	2.01%
11	13065	Sharmin Akhter	1201750068184225	CMSL Securities Ltd.	282345	205945	488290	25058108	1.95%
12	10241	Md. Kamal Uddin	1202220044276446	Meghna Bank Securities Ltd.	0	167000	167000	25058108	0.67%
13	CM521	Hasina Akter	1605170069219894	City Bank Capital Resources Ltd.	400000	154790	554790	25058108	2.21%
14	10708	Prime Finance Capital Management Ltd.	1204280054972693	Vision Capital Management Ltd.	0	141568	141568	25058108	0.56%
15	A16449	Md. Nazib Mahmud Shajib	1201830062258465	LANKABANGLA Securities Ltd.	181000	140000	321000	25058108	1.28%

### Findings:

- It was observed that Mr. Md. Saif Ullah (Client code # CM411 of City Bank Capital Resources Ltd.) was the top seller of shares of "JANATAINS" from 17.08.2021 to 31.08.2021. The said client bought 8,885,836 shares and sold 4,904,241 shares of "JANATAINS" during the aforementioned investigation period, which is 55.03% of total traded share of "JANATAINS" during the period.

### A. Trade pattern of Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate:

#### Observation 01:

Mr. Md. Saif Ullah (Client code # CM411 of City Bank Capital Resources Ltd.) traded shares of "JANATAINS" from 17.08.2021 to 31.08.2021. After examining the relevant documents, it was also observed that the said client participated in trading of shares of "JANATAINS" in association with some other accounts maintained in the name of his family members and the details of the same are delineated as follows:

Sl No.	BO ID	Client Code	Client Name	Name of TREC Holder	Relationship
01.	1605170064096113	CM411	Md. Saif Ullah	City Bank Capital Resources Limited	Md. Saif Ullah himself
02.	1605170069260129	CM529	Md. A. G. Mahmud and S. M. Motaharul Janan	City Bank Capital Resources Limited	His brother Md. A. G. Mahmud
03.	1605170069219894	CM521	Hasina Akter	City Bank Capital Resources Limited	His sister Hasina Akter

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**Individual Trade Patterns, Effects of “JANATAINS” at DSE in Public and Block Market by the said clients, Trade monitoring screenshots and gain and loss statement are given below:**

**i) Individual Trade Patterns of Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate (Only Public Market):**

Date	Code # CM411				Code # CM529				Code # CM521				Total					
	BO ID # 1605170064096113				BO ID # 1605170069260129				BO ID # 1605170069219894									
	Md. Saif Ullah				Md. A. G. Mahmud and S. M. Motaharul Janan				Hasina Akter									
	City Bank Capital Resources Limited				City Bank Capital Resources Limited				City Bank Capital Resources 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
19-08-2021	1482604	44.79	0	0.00	0	0.00	0	0.00	400000	44.25	0	0.00	1882604	44.68	84112081.10	0	0.00	0.00
22-08-2021	1272341	47.36	0	0.00	170000	46.76	0	0.00	0	0.00	0	0.00	1442341	47.29	68206528.10	0	0.00	0.00
23-08-2021	1716841	53.56	1471736	51.97	1385000	52.60	0	0.00	0	0.00	0	0.00	3101841	53.13	164804007.90	1471736	51.97	76484825.50
24-08-2021	1109277	56.65	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1109277	56.65	62843506.70	0	0.00	0.00
25-08-2021	807384	59.96	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	807384	59.96	48413532.70	0	0.00	0.00
26-08-2021	436784	60.21	1113566	58.03	176760	63.84	0	0.00	0	0.00	0	0.00	613544	61.25	37581021.40	1113566	58.03	64622027.50
29-08-2021	683512	59.97	2318939	56.69	0	0.00	0	0.00	0	0.00	0	0.00	683512	59.97	40990935.50	2318939	56.69	131459063.50
31-08-2021	1377093	60.94	0	0.00	103104	57.92	1697712	57.48	0	0.00	154790	63.38	1480197	60.73	89897574.10	1652502	57.97	107391840.40
<b>Total</b>	<b>8885836</b>		<b>4904241</b>		<b>1834864</b>		<b>1697712</b>		<b>400000</b>		<b>154790</b>		<b>11120700</b>			<b>6756743</b>		

**ii) Effects of ‘JANATAINS’ at DSE by Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate (Public and Block Market):**

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	18
Opening Balance										0	0.00	0.00						
16-08-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	367980	39.00	0.00%	0.00%	0.00%	0.00%
17-08-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	477256	40.50	3.85%	0.00%	0.00%	0.00%
18-08-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	376396	40.80	0.74%	0.00%	0.00%	0.00%
19-08-2021	1882604	44.68	84112081.10	0	0.00	0.00	0	0.00	0.00	1882604	44.68	84112081.10	2988417	44.50	9.07%	63.00%	0.00%	63.00%
22-08-2021	1442341	47.29	68206528.10	0	0.00	0.00	0	0.00	0.00	3324945	45.81	152318609.20	3955444	48.80	9.66%	36.46%	0.00%	36.46%
23-08-2021	3101841	53.13	164804007.90	1471736	51.97	76484825.50	0	49.34	72621178.30	4955050	49.34	244501438.80	5219895	53.40	9.43%	59.42%	28.19%	87.62%
24-08-2021	1109277	56.65	62843506.70	0	0.00	0.00	0	0.00	0.00	6064327	50.68	307344945.50	1944620	58.20	8.99%	57.04%	0.00%	57.04%
25-08-2021	807384	59.96	48413532.70	0	0.00	0.00	0	0.00	0.00	6871711	51.77	355758478.20	1623766	58.20	0.00%	49.72%	0.00%	49.72%
26-08-2021	613544	61.25	37581021.40	1113566	58.03	64622027.50	0	52.55	58516308.82	6371689	52.55	334823190.78	1847725	56.90	-2.23%	33.21%	60.27%	93.47%
29-08-2021	683512	59.97	40990935.50	2318939	56.69	131459063.50	0	53.27	123524479.91	4736262	53.27	252289646.37	3132441	57.80	1.58%	21.82%	74.03%	95.85%
31-08-2021	1480197	60.73	89897574.10	1852502	57.97	107391840.40	0	55.05	101971638.56	4363957	55.05	240215581.90	3492148	62.90	8.82%	42.39%	53.05%	95.43%
<b>Total</b>	<b>11120700</b>	<b>53.67</b>	<b>596849187.50</b>	<b>6756743</b>	<b>56.23</b>	<b>379957756.90</b>	<b>0</b>	<b>52.78</b>	<b>356633605.60</b>	<b>4363957</b>	<b>55.05</b>	<b>240215581.90</b>						

**iii) Trade monitoring screenshots of Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate (Public market):**

The Investigation Team collected Trade monitoring screenshots from the Surveillance Department on some trading dates where appearance of active trading of Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate were observed to influence the price of ‘JANATAINS’.

The details of the graphs are given below:

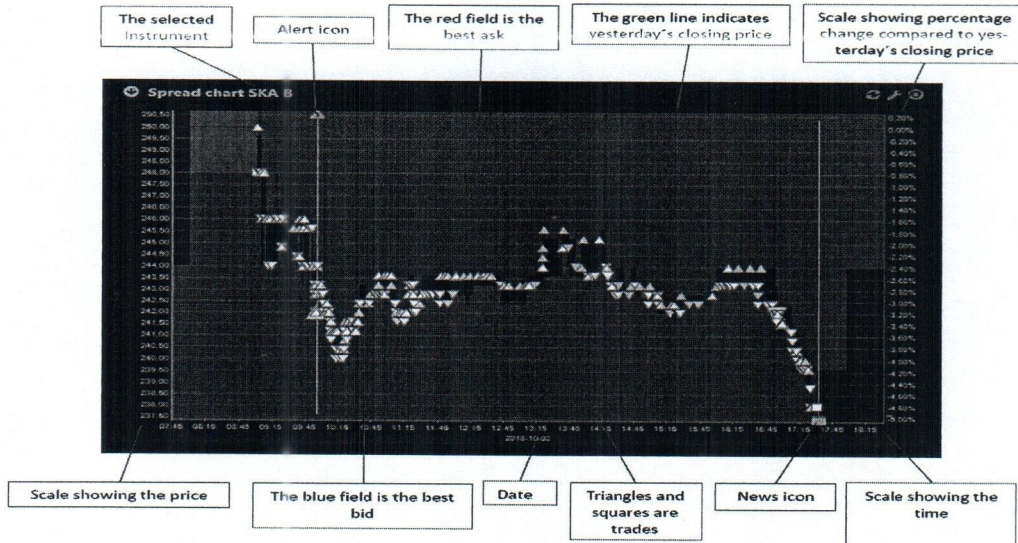
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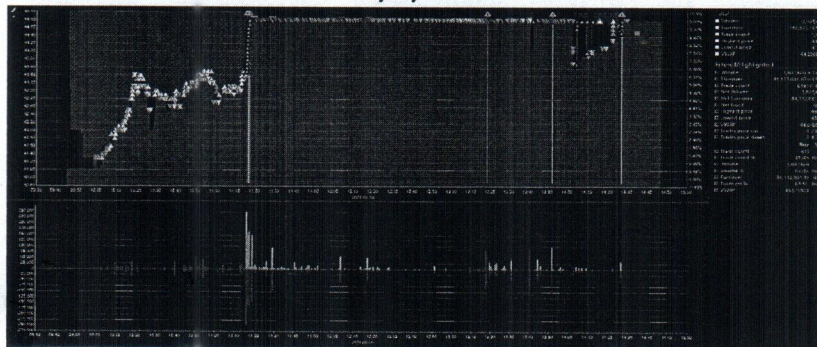


▲ Green triangle represents trade of JANATAINS by Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate

△ White triangle represents trade of JANATAINS by other clients

After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it is found that Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate were involved in trading of shares of 'JANATAINS' which influenced price of shares of the said company on several dates as follows:

19/8/2021



It was observed in the above graph that on 19-08-2021, total number of trades of JANATAINS in the market was 1480, whereas number of trades (buy) executed by Md. Saif Ullah, Md. A.G. Mahmud and their associate were 619 which is approximately 41.82% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 2,988,417 whereas buy volume by the said client(s) was 1,882,604 which is approximately 63.00% of the total traded volume in the market. It is evident that the client had significant participation in the market on 19-08-2021 in trading of JANATAINS share.

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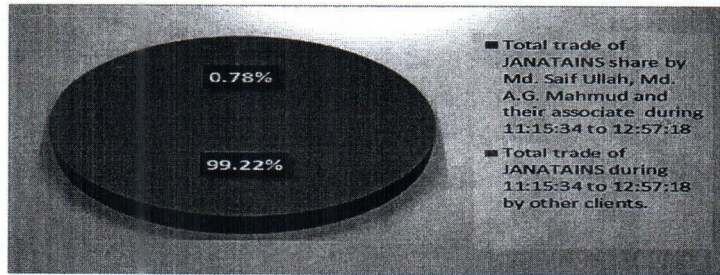
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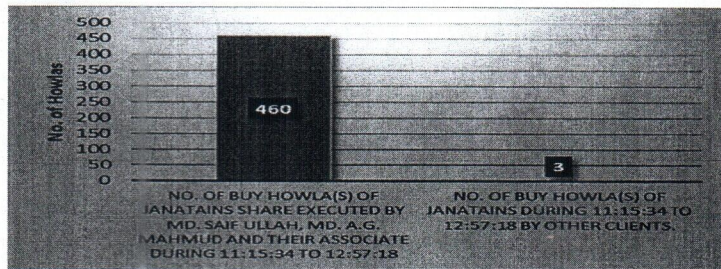
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On 19-08-2021, trading of JANATAINS share was started at Tk. 41.30 which is Tk. 0.50 more than the YCP of Tk. 40.80. On that day, Md. Saif Ullah, Md. A.G. Mahmud and their associate started series of trading at 11:15:34 at price Tk. 43.50 and induced the same to rise to Tk. 44.80 up to 11:17:05 which was the upper limit of circuit breaker. The price of JANATAINS became halted at Tk. 44.80. It was found that the said clients traded at the halted price of Tk. 44.80 from 11:17:05 to 12:57:18. It is mentionable here that from 11:15:34 to 12:57:18, Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 1,400,000 shares of JANATAINS compared to the total traded share of 1,411,000. This is shown in the following Pie Chart.

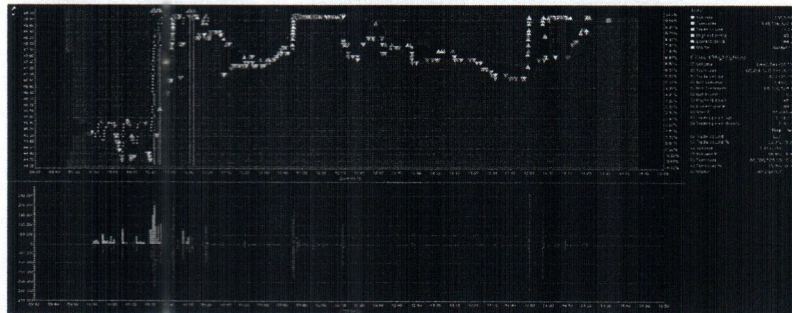


It is also found that during the aforementioned period, Md. Saif Ullah, Md. A.G. Mahmud and their associate executed 460 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 463 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 99.22% of the total trades of JANATAINS shares by executing 460 of total 463 howlas from 11:15:34 to 12:57:18 on 19-08-2021. From 11:17:05 to 12:57:18 the said clients traded at the halted price of Tk. 48.80 and kept the price stagnant. Thus it seems that Md. Saif Ullah, Md. A.G. Mahmud and their associate were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 3.70 which is approximately 9.07% higher than YCP.

22/8/2021



It was observed in the above graph that on 22-08-2021, total number of trades of JANATAINS in the market was 1776, whereas number of trades (buy) executed by Md. Saif

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Enforcement Division

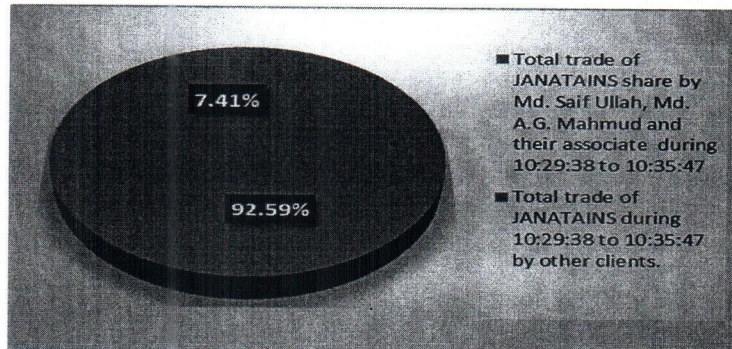
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

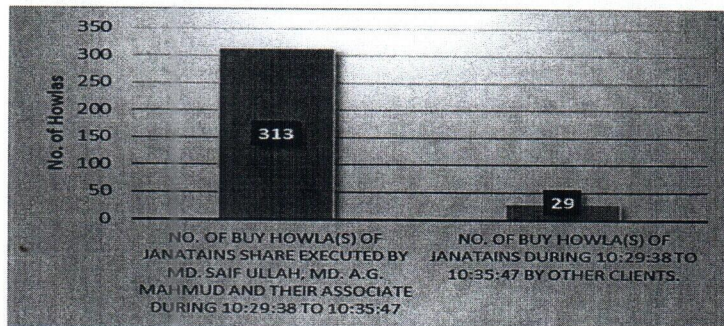
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Ullah, Md. A.G. Mahmud and their associate were 627 which is approximately 35.30% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 3,955,444 whereas buy volume by the said client(s) was 1,442,341 which is approximately 36.46% of the total traded volume in the market. It is evident that the client had significant participation in the market on 22-08-2021 in trading of JANATAINS share.

On 22-08-2021, trading of JANATAINS share was started at Tk. 45.10 which is Tk. 0.60 more than the YCP of Tk. 44.50. On that day, Md. Saif Ullah, Md. A.G. Mahmud and their associate started series of trading at 10:29:38 at price Tk. 45.20 and induced the same to rise to Tk. 48.90 up to 10:35:47. It can also be observed from the above graph that Md. Saif Ullah, Md. A.G. Mahmud and their associate executed significant trades during this time period. It is mentionable here that from 10:29:38 to 10:35:47, Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 842,072 shares of JANATAINS compared to the total traded share of 909,472. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Saif Ullah, Md. A.G. Mahmud and their associate executed 313 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 342 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 92.59% of the total trades of JANATAINS shares by executing 313 of total 342 howlas from 10:29:38 to 10:35:47 on 22-08-2021. From 10:29:38 to 10:35:47, Md. Saif Ullah, Md. A.G. Mahmud and their associate induced the price to rise from Tk. 45.20 to Tk. 48.90. Thus it seems that Md. Saif Ullah, Md. A.G. Mahmud and their associate were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 4.30 which is approximately 9.66% higher than YCP.

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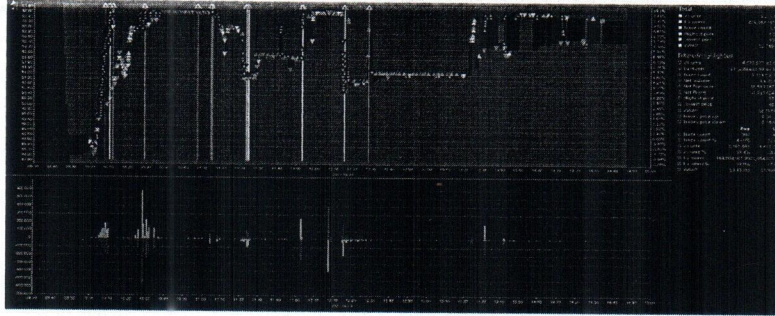
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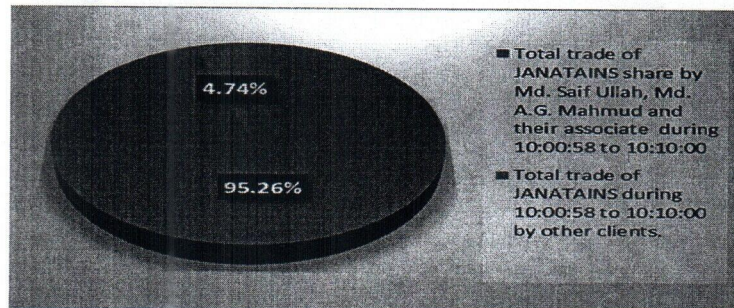
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23/8/2021

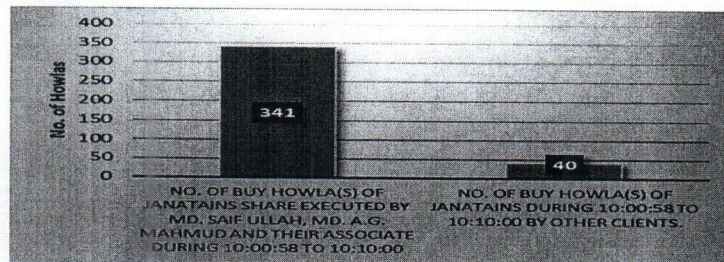


It was observed in the above graph that on 23-08-2021, total number of trades of JANATAINS in the market was 1818, whereas number of trades (buy) executed by Md. Saif Ullah, Md. A.G. Mahmud and their associate were 907 which is approximately 49.89% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 5,219,895 whereas buy volume by the said client(s) was 3,101,841 which is approximately 59.42% of the total traded volume in the market. It is evident that the client had significant participation in the market on 23-08-2021 in trading of JANATAINS share.

On 23-08-2021, trading of JANATAINS share was started at Tk. 48.50 which is Tk. -0.30 less than the YCP of Tk. 48.80. On that day, Md. Saif Ullah, Md. A.G. Mahmud and their associate started series of trading at 10:00:58 at price Tk. 48.50 and induced the same to rise to Tk. 53.60 up to 10:10:00. It can also be observed from the above graph that Md. Saif Ullah, Md. A.G. Mahmud and their associate executed significant trades during this time period. It is mentionable here that from 10:00:58 to 10:10:00, Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 819,800 shares of JANATAINS compared to the total traded share of 860,568. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Saif Ullah, Md. A.G. Mahmud and their associate executed 341 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 381 as shown in the following Bar Chart.



*Handwritten signature/initials*



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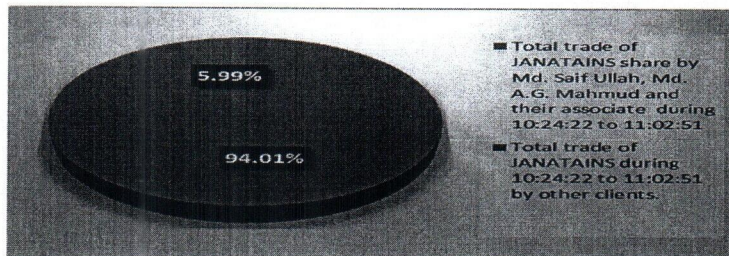
Enforcement Department

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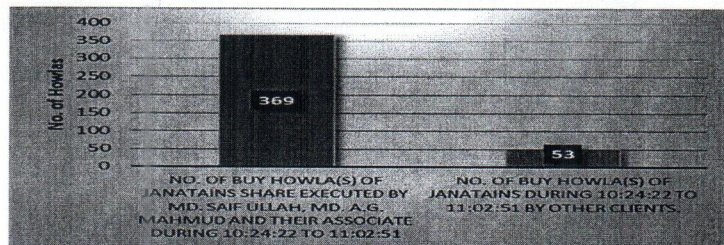
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It is observed from the above graphs and screenshot that Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 95.26% of the total trades of JANATAINS shares by executing 341 of total 381 howlas from 10:00:58 to 10:10:00 on 23-08-2021. From 10:00:58 to 10:10:00, Md. Saif Ullah, Md. A.G. Mahmud and their associate induced the price to rise from Tk. 48.50 to Tk. 53.60.

Again, on that day, Md. Saif Ullah, Md. A.G. Mahmud and their associate started series of trading at 10:24:22 at price Tk. 53.00 and induced the same to rise to Tk. 53.60 up to 10:36:46 which was the upper limit of circuit breaker. The price of JANATAINS became halted at Tk. 53.60. It was found that the said clients traded at the halted price of Tk. 53.60 from 10:36:46 to 11:02:51. It is mentionable here that from 10:24:22 to 11:02:51, Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 1,622,957 shares of JANATAINS compared to the total traded share of 1,726,363. This is shown in the following Pie Chart.

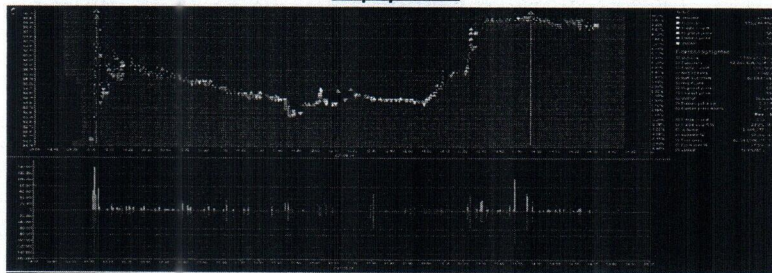


It is also found that during the aforementioned period, Md. Saif Ullah, Md. A.G. Mahmud and their associate executed 369 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 422 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 94.01% of the total trades of JANATAINS shares by executing 369 of total 422 howlas from 10:24:22 to 11:02:51 on 23-08-2021. From 10:24:22 to 11:02:51, the said clients traded at the halted price of Tk. 53.60 and kept the price stagnant. Thus it seems that Md. Saif Ullah, Md. A.G. Mahmud and their associate were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 4.60 which is approximately 9.43% higher than YCP.

24/8/2021



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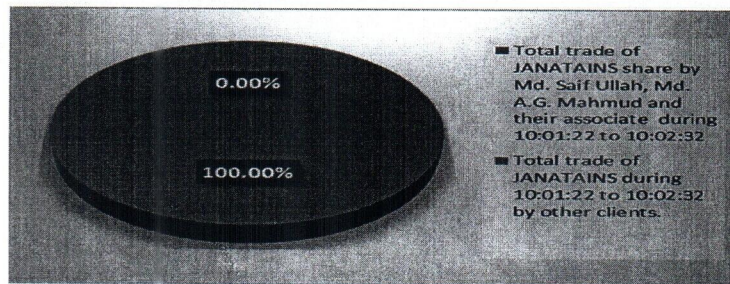
Enforcement Department

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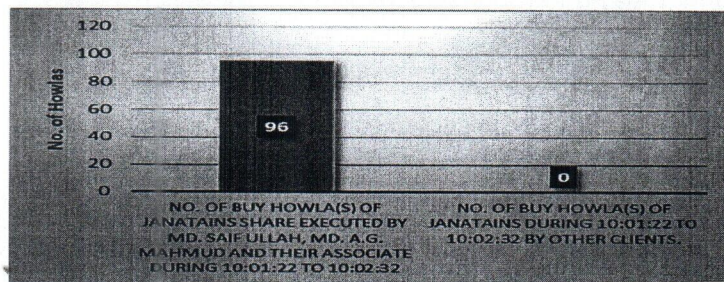
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It was observed in the above graph that on 24-08-2021, total number of trades of JANATAINS in the market was 1429, whereas number of trades (buy) executed by Md. Saif Ullah, Md. A.G. Mahmud and their associate were 555 which is approximately 38.84% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 1,944,620 whereas buy volume by the said client(s) was 1,109,277 which is approximately 57.04% of the total traded volume in the market. It is evident that the client had significant participation in the market on 24-08-2021 in trading of JANATAINS share.

On 24-08-2021, trading of JANATAINS share was started at Tk. 52.10 which is Tk. -1.30 less than the YCP of Tk. 53.40. On that day, Md. Saif Ullah, Md. A.G. Mahmud and their associate started series of trading at 10:01:22 at price Tk. 53.30 and induced the same to rise to Tk. 58.60 up to 10:02:32. It can also be observed from the above graph that Md. Saif Ullah, Md. A.G. Mahmud and their associate executed significant trades during this time period. It is mentionable here that from 10:01:22 to 10:02:32, Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 255,000 shares of JANATAINS compared to the total traded share of 255,000. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Saif Ullah, Md. A.G. Mahmud and their associate executed 96 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 96 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 100.00% of the total trades of JANATAINS shares by executing 96 of total 96 howlas from 10:01:22 to 10:02:32 on 24-08-2021. From 10:01:22 to 10:02:32, Md. Saif Ullah, Md. A.G. Mahmud and their associate induced the price to rise from Tk. 53.30 to Tk. 58.60.

Again on that day, Md. Saif Ullah, Md. A.G. Mahmud and their associate started series of trading at 13:28:40 at price Tk. 58.00 and induced the same to rise to Tk. 58.40 up to 14:26:35. It can also be observed from the above graph that Md. Saif Ullah, Md. A.G. Mahmud and their associate executed significant trades during this time period. It is mentionable here that from 13:28:40 to 14:26:35, Md. Saif Ullah, Md. A.G. Mahmud and their associate

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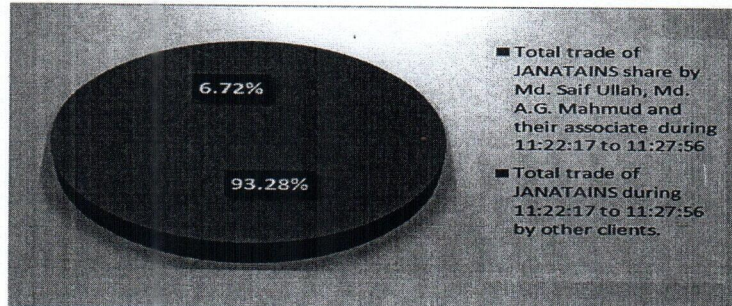
Enforcement Division

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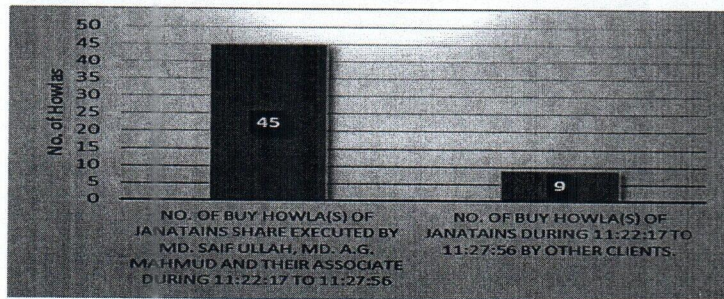
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bought 380,549 shares of JANATAINS compared to the total traded share of 488,799. This is shown in the following Pie Chart.

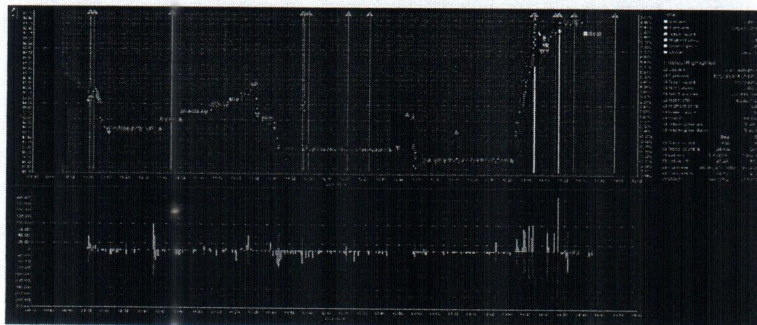


It is also found that during the aforementioned period, Md. Saif Ullah, Md. A.G. Mahmud and their associate executed 156 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 244 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 77.85% of the total trades of JANATAINS shares by executing 156 of total 244 howlas from 13:28:40 to 14:26:35 on 24-08-2021. From 13:28:40 to 14:26:35, Md. Saif Ullah, Md. A.G. Mahmud and their associate induced the price to rise from Tk. 58.00 to Tk. 58.40. Thus it seems that Md. Saif Ullah, Md. A.G. Mahmud and their associate were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 4.80 which is approximately 8.99% higher than YCP.

31/8/2021



It was observed in the above graph that on 31-08-2021, total number of trades of JANATAINS in the market was 1770, whereas number of trades (buy) executed by Md. Saif Ullah, Md. A.G. Mahmud and their associate were 608 which is approximately 34.35% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 3,492,148 whereas buy volume by the said client(s) was 1,480,197

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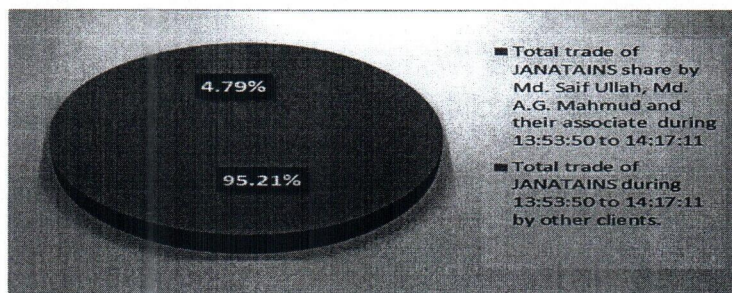
Enforcement Department

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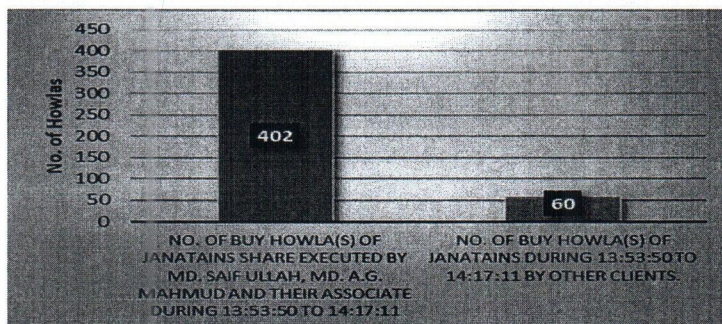
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which is approximately 42.39% of the total traded volume in the market. It is evident that the client had significant participation in the market on 31-08-2021 in trading of JANATAINS share.

On 31-08-2021, trading of JANATAINS share was started at Tk. 59.40 which is Tk. 1.60 more than the YCP of Tk. 57.80. On that day, Md. Saif Ullah, Md. A.G. Mahmud and their associate started series of trading at 13:53:50 at price Tk. 57.80 and induced the same to rise to Tk. 63.50 up to 14:17:11. It can also be observed from the above graph that Md. Saif Ullah, Md. A.G. Mahmud and their associate executed significant trades during this time period. It is mentionable here that from 13:53:50 to 14:17:11, Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 812,822 shares of JANATAINS compared to the total traded share of 853,722. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Saif Ullah, Md. A.G. Mahmud and their associate executed 402 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 462 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Saif Ullah, Md. A.G. Mahmud and their associate bought 95.21% of the total trades of JANATAINS shares by executing 402 of total 462 howlas from 13:53:50 to 14:17:11 on 31-08-2021. From 13:53:50 to 14:17:11, Md. Saif Ullah, Md. A.G. Mahmud and their associate induced the price to rise from Tk. 57.80 to Tk. 63.50. Thus it seems that Md. Saif Ullah, Md. A.G. Mahmud and their associate were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 5.10 which is approximately 8.82% higher than YCP.

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iv) Gain/Loss of Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate by trading shares of JANATAINS from 17.08.2021 to 31.08.2021:

Summary										
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
11120700	53.67	596849187.50	6756743	56.23	379957756.90	52.78	356633605.60	4363957	55.05	240215581.90

Realized Capital gain(loss)per unit	3.45	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	6.54%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	2,33,24,151.30	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (31-08-2021)	62.90	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	7.85	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	14.27%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	3,42,77,313.40	Quantity of Stock Position x Unrealized gain (loss) per unit

As per DSE trade data, Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate bought total 17877443 shares of "JANATAINS" from 17.08.2021 to 31.08.2021. They traded 71.34% of total trade volume of shares of "JANATAINS" with the said BO accounts and realized a capital gain of BDT 2,33,24,151.30 by trading of shares of "JANATAINS" during the investigation period. Moreover, his unrealized gain is BDT 3,42,77,313.40 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 Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate were involved directly and indirectly in a series of transaction of share of "JANATAINS" in order to create the appearance of active trading of the said share.

## **Contravention:**

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Through the aforesaid activities it appears that **Mr. Md. Saif Ullah (BOID: 1605170064096113)**, **Md. A.G. Mahmud (BOID: 1605170069260129)** and their associate have violated the following:

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

## B. Observations - 2:

After analyzing ledger, instrument ledger and portfolio statements of Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate collected from DSE TREC Holder companies, it was observed that they had collectively acquired more than 10% shares of "JANATAINS" on the following date(s). Details are given below:

BO ID	Client Code	Client Name	23-08-22	24-08-22	25-08-22	26-08-22	29-08-22	31-08-22
1605170064096113	CM411	Md. Saif Ullah	3,000,050.00	4,109,327.00	4,916,711.00	4,239,929.00	2,604,502.00	3,981,595.00
1605170069260129	CM529	Md. A. G. Mahmud and S. M. Motaharul Janan	1,555,000.00	1,555,000.00	1,555,000.00	1,731,760.00	1,731,760.00	137,152.00
1605170069219894	CM521	Hasina Akter	400,000.00	400,000.00	400,000.00	400,000.00	400,000.00	245,210.00
Total holding of share of Md. Saif Ullah, Md. A. G. Mahmud and associates			4,955,050.00	6,064,327.00	6,871,711.00	6,371,689.00	4,736,262.00	4,363,957.00
Number of total paid up shares			42,283,821.00	42,283,821.00	42,283,821.00	42,283,821.00	42,283,821.00	42,283,821.00
% of holding of shares			11.72%	14.34%	16.25%	15.07%	11.20%	10.32%

## Findings:

However, 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 না থাকিলে, এই বিধিমালায়, (ক) "অধিগ্রহণকারী" অর্থ এমন কোন ব্যক্তি যে নিজে বা অন্য কাহারো সহিত সম্মিলিত হইয়া (persons acting in concert) কোন কোম্পানির ভোটাধিকারযুক্ত শেয়ার অথবা ভোটাধিকারযুক্ত শেয়ারে রূপান্তরযোগ্য সিকিউরিটিজ অধিগ্রহণ করে বা উহার জন্য প্রস্তাব করে....."

And as per বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮:

"----৪। 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।....."

From the above, it appears that **Mr. Md. Saif Ullah, Md. A.G. Mahmud and their associate** have collectively bought more than 10% shares of "JANATAINS" as on the aforesaid dates.

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**Contravention:**

Through the aforesaid activities it appears that Mr. Md. Saif Ullah (BOID: 1605170064096113), Md. A.G. Mahmud (BOID: 1605170069260129) and their associate have violated the following:

- বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ by jointly acquiring more than 10% shares of "JANATAINS" without following the above mentioned law.

**C. Trade pattern of Md. Saif Ullah:**

**Observation 01:**

Mr. Md. Saif Ullah (Client code # CM411 of City Bank Capital Resources Ltd.) traded shares of "JANATAINS" from 17.08.2021 to 31.08.2021, details of the same is delineated as follows:

Sl No.	BO ID	Client Code	Client Name	Name of TREC Holder
01.	1605170064096113	CM411	Md. Saif Ullah	City Bank Capital Resources Limited

**Individual Trade Patterns, Effects of "JANATAINS" at DSE in Public and Block Market by the said client. Trade monitoring screenshots and gain and loss statement are given below:**

**i) Individual Trade Pattern of Mr. Md. Saif Ullah (Only Public Market):**

Date	Code # CM411				Total					
	BO ID # 1605170064096113									
	Md. Saif Ullah									
	City Bank Capital Resources Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
19-08-2021	1482604	44.79	0	0.00	1482604	44.79	66412378.30	0	0.00	0.00
22-08-2021	1272341	47.36	0	0.00	1272341	47.36	60266911.60	0	0.00	0.00
23-08-2021	1716841	53.56	1471736	51.97	1716841	53.56	91947111.40	1471736	51.97	76484825.50
24-08-2021	1109277	56.65	0	0.00	1109277	56.65	62843506.70	0	0.00	0.00
25-08-2021	807384	59.96	0	0.00	807384	59.96	48413532.70	0	0.00	0.00
26-08-2021	436784	60.21	1113566	58.03	436784	60.21	26297331.40	1113566	58.03	64622027.50
29-08-2021	683512	59.97	2318939	56.69	683512	59.97	40990935.50	2318939	56.69	131459063.50
31-08-2021	1377093	60.94	0	0.00	1377093	60.94	83926300.50	0	0.00	0.00
<b>Total</b>	<b>8885836</b>		<b>4904241</b>		<b>8885836</b>			<b>4904241</b>		

**ii) Effects of 'JANATAINS' at DSE by Mr. Md. Saif Ullah (Public and Block Market):**

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																		
16-08-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	367980	39.00	0.00%	0.00%	0.00%	0.00%
17-08-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	477256	40.50	3.85%	0.00%	0.00%	0.00%
18-08-2021	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	376396	40.80	0.74%	0.00%	0.00%	0.00%
19-08-2021	1482604	44.79	66412378.30	0	0.00	0.00	0	0.00	0.00	1482604	44.79	66412378.30	2988417	44.50	9.07%	49.61%	0.00%	49.61%
22-08-2021	1272341	47.36	60266911.60	0	0.00	0.00	0	0.00	0.00	2754945	45.98	126669289.90	3955444	48.80	9.66%	32.17%	0.00%	32.17%
23-08-2021	1716841	53.56	91947111.40	1471736	51.97	76484825.50	0	48.89	71950139.83	3000050	48.89	146666261.47	5219895	53.40	9.43%	32.89%	28.19%	61.09%
24-08-2021	1109277	56.65	62843506.70	0	0.00	0.00	0	0.00	0.00	4109327	50.98	209509768.17	1944620	58.20	8.99%	57.04%	0.00%	57.04%
25-08-2021	807384	59.96	48413532.70	0	0.00	0.00	0	0.00	0.00	4916711	52.46	257923300.87	1623766	58.20	0.00%	49.72%	0.00%	49.72%
26-08-2021	436784	60.21	26297331.40	1113566	58.03	64622027.50	0	53.09	59119964.17	4239929	53.09	225100668.10	1847725	56.90	-2.23%	23.64%	60.27%	83.91%
29-08-2021	683512	59.97	40990935.50	2318939	56.69	131459063.50	0	54.05	125329052.82	2604502	54.05	140762550.78	3132441	57.80	1.58%	21.82%	74.03%	95.85%
31-08-2021	1377093	60.94	83926300.50	0	0.00	0.00	0	0.00	0.00	3981595	56.43	224688851.28	3492148	62.90	8.82%	39.43%	0.00%	39.43%
<b>Total</b>	<b>8885836</b>	<b>54.14</b>	<b>481088008.10</b>	<b>4904241</b>	<b>55.38</b>	<b>272565916.50</b>	<b>0</b>	<b>52.28</b>	<b>256399156.82</b>	<b>3981595</b>	<b>56.43</b>	<b>224688851.28</b>						

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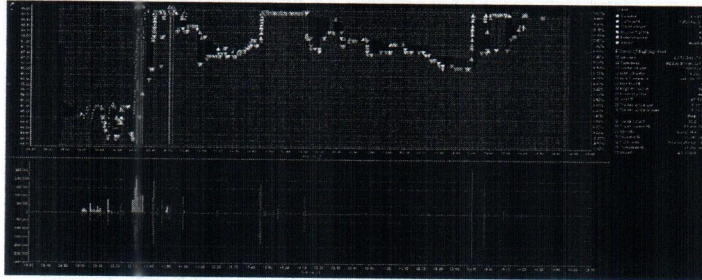
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## iii) Trade monitoring screenshots of Md. Saif Ullah (Public market):

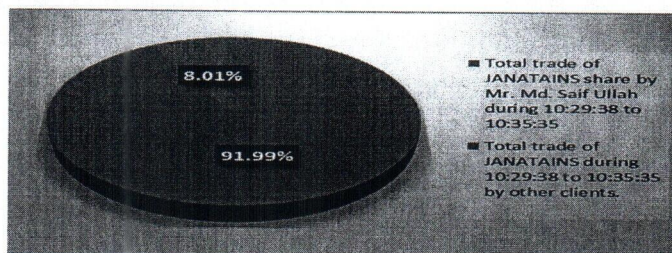
After scrutinizing the Trade monitoring screenshots collected from Surveillance Department, it is found that Md. Saif Ullah was involved in trading of shares of 'JANATAINS' which influenced price of shares of the said company on several dates as follows:

22.08.2021

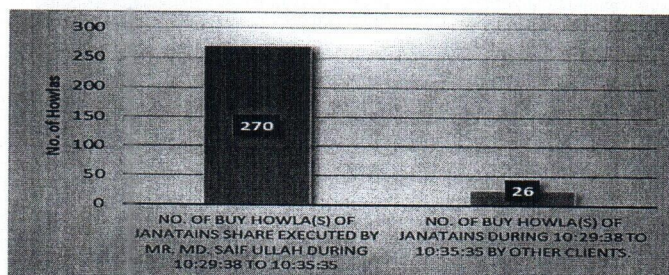


It was observed in the above graph that on 22-08-2021, total number of trades of JANATAINS in the market was 1776, whereas number of trades (buy) executed by Mr. Md. Saif Ullah were 550 which is approximately 30.97% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 3,955,444 whereas buy volume by the said client(s) was 1,272,341 which is approximately 32.17% of the total traded volume in the market. It is evident that the client had significant participation in the market on 22-08-2021 in trading of JANATAINS share.

On 22-08-2021, trading of JANATAINS share was started at Tk. 45.10 which is Tk. 0.60 more than the YCP of Tk. 44.50. On that day, Mr. Md. Saif Ullah started series of trading at 10:29:38 at price Tk. 45.20 and induced the same to rise to Tk. 48.90 up to 10:35:35. It can also be observed from the above graph that Mr. Md. Saif Ullah executed significant trades during this time period. It is mentionable here that from 10:29:38 to 10:35:35, Mr. Md. Saif Ullah bought 749,986 shares of JANATAINS compared to the total traded share of 815,286. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Md. Saif Ullah executed 270 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 296 as shown in the following Bar Chart.



*Handwritten signature/initials*



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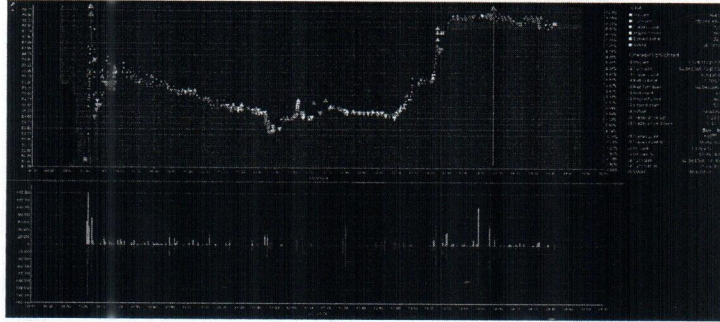
Enforcement Department

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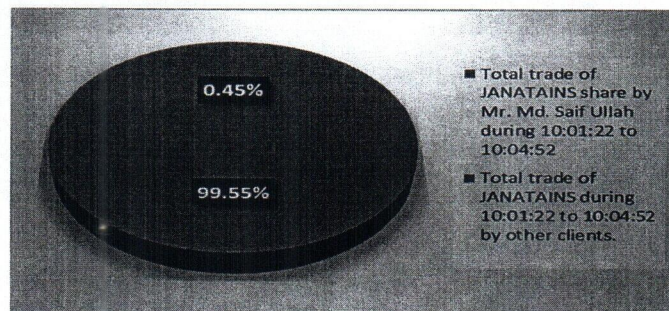
It is observed from the above graphs and screenshot that Mr. Md. Saif Ullah bought 91.99% of the total trades of JANATAINS shares by executing 270 of total 296 howlas from 10:29:38 to 10:35:35 on 22-08-2021. From 10:29:38 to 10:35:35, Mr. Md. Saif Ullah induced the price to rise from Tk. 45.20 to Tk. 48.90. Thus it seems that Mr. Md. Saif Ullah were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 4.30 which is approximately 9.66% higher than YCP.

**24.08.2021**



It was observed in the above graph that on 24-08-2021, total number of trades of JANATAINS in the market was 1429, whereas number of trades (buy) executed by Mr. Md. Saif Ullah were 555 which is approximately 38.84% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 1,944,620 whereas buy volume by the said client(s) was 1,109,277 which is approximately 57.04% of the total traded volume in the market. It is evident that the client had significant participation in the market on 24-08-2021 in trading of JANATAINS share.

On 24-08-2021, trading of JANATAINS share was started at Tk. 52.10 which is Tk. 1.30 less than the YCP of Tk. 53.40. On that day, Mr. Md. Saif Ullah started series of trading at 10:01:22 at price Tk. 53.30 and induced the same to rise to Tk. 57.90 up to 10:04:52. It can also be observed from the above graph that Mr. Md. Saif Ullah executed significant trades during this time period. It is mentionable here that from 10:01:22 to 10:04:52, Mr. Md. Saif Ullah bought 335,000 shares of JANATAINS compared to the total traded share of 336,500. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Md. Saif Ullah executed 128 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 130 as shown in the following Bar Chart.

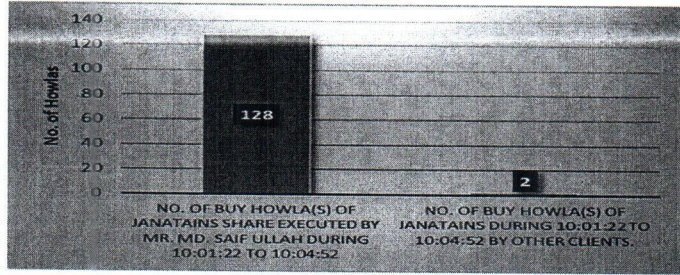
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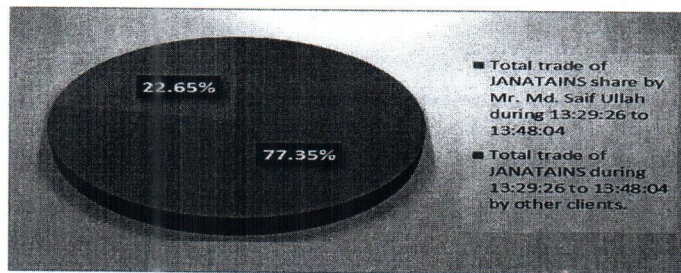
Market, Market Intermediaries and Other Affairs Section

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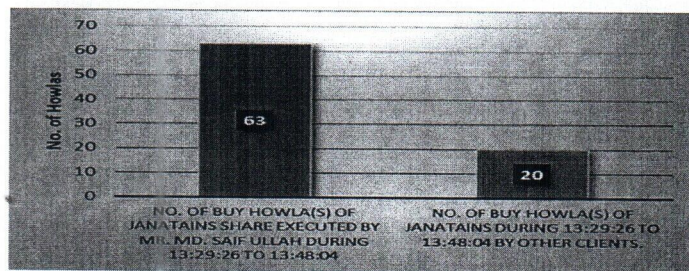


It is observed from the above graphs and screenshot that Mr. Md. Saif Ullah bought 99.55% of the total trades of JANATAINS shares by executing 128 of total 130 howlas from 10:01:22 to 10:04:52 on 24-08-2021. From 10:01:22 to 10:04:52, Mr. Md. Saif Ullah induced the price to rise from Tk. 53.30 to Tk. 57.90.

Again on that day, Mr. Md. Saif Ullah started series of trading at 13:29:26 at price Tk. 57.90 and induced the same to rise to Tk. 58.50 up to 13:48:04. It can also be observed from the above graph that Mr. Md. Saif Ullah executed significant trades during this time period. It is mentionable here that from 13:29:26 to 13:48:04, Mr. Md. Saif Ullah bought 140,523 shares of JANATAINS compared to the total traded share of 181,682. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Md. Saif Ullah executed 63 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 83 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Md. Saif Ullah bought 77.35% of the total trades of JANATAINS shares by executing 63 of total 83 howlas from 13:29:26 to 13:48:04 on 24-08-2021. From 13:29:26 to 13:48:04, Mr. Md. Saif Ullah induced the price to rise from Tk. 57.90 to Tk. 58.50. Thus it seems that Mr. Md. Saif Ullah were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 4.80 which is approximately 8.99% higher than YCP.

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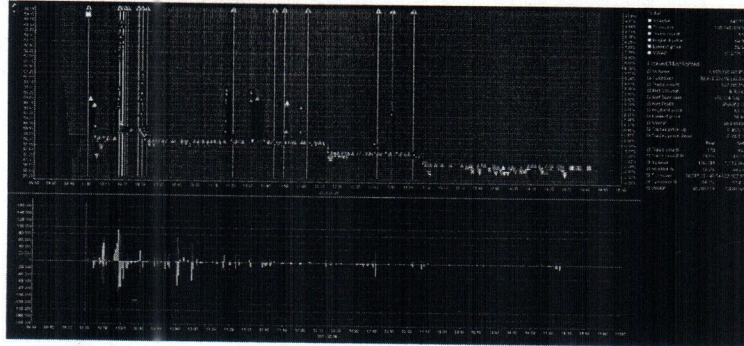
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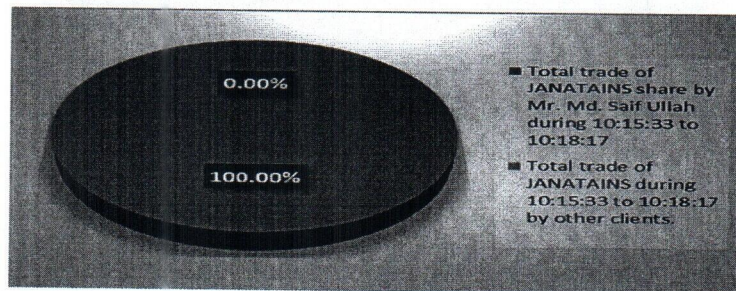
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26.08.2021

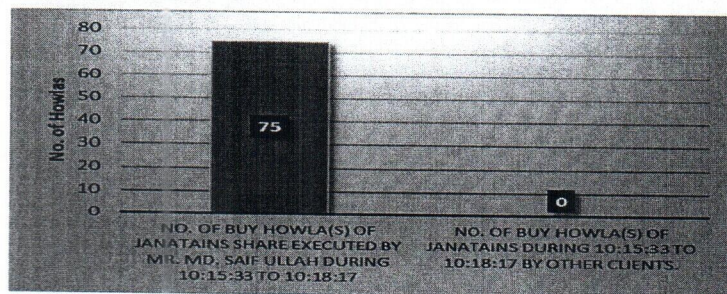


It was observed in the above graph that on 26-08-2021, total number of trades of JANATAINS in the market was 933, whereas number of trades (buy) executed by Mr. Md. Saif Ullah were 178 which is approximately 19.08% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 1,847,725 whereas buy volume by the said client(s) was 436,784 which is approximately 23.64% of the total traded volume in the market. It is evident that the client had significant participation in the market on 26-08-2021 in trading of JANATAINS share.

On 26-08-2021, trading of JANATAINS share was started at Tk. 64.00 which is Tk. 5.80 more than the YCP of Tk. 58.20. On that day, Mr. Md. Saif Ullah started series of trading at 10:15:33 at price Tk. 59.60 and induced the same to rise to Tk. 63.70 up to 10:18:17. It can also be observed from the above graph that Mr. Md. Saif Ullah executed significant trades during this time period. It is mentionable here that from 10:15:33 to 10:18:17, Mr. Md. Saif Ullah bought 186,807 shares of JANATAINS compared to the total traded share of 186,807. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Md. Saif Ullah executed 75 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 75 as shown in the following Bar Chart.



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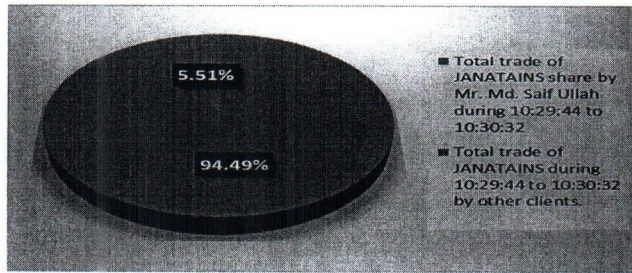
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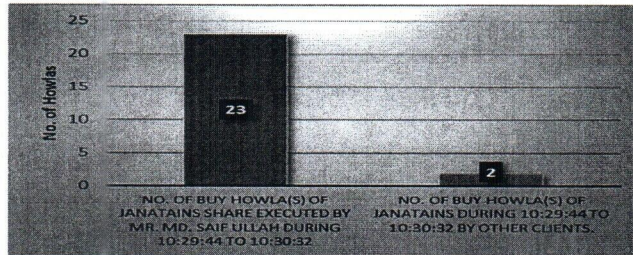
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It is observed from the above graphs and screenshot that Mr. Md. Saif Ullah bought 100.00% of the total trades of JANATAINS shares by executing 75 of total 75 howlas from 10:15:33 to 10:18:17 on 26-08-2021. From 10:15:33 to 10:18:17, Mr. Md. Saif Ullah induced the price to rise from Tk. 59.60 to Tk. 63.70.

Again on that day, Mr. Md. Saif Ullah started series of trading at 10:29:44 at price Tk. 59.30 and induced the same to rise to Tk. 61.20 up to 10:30:32. It can also be observed from the above graph that Mr. Md. Saif Ullah executed significant trades during this time period. It is mentionable here that from 10:29:44 to 10:30:32, Mr. Md. Saif Ullah bought 34,330 shares of JANATAINS compared to the total traded share of 36,330. This is shown in the following Pie Chart.

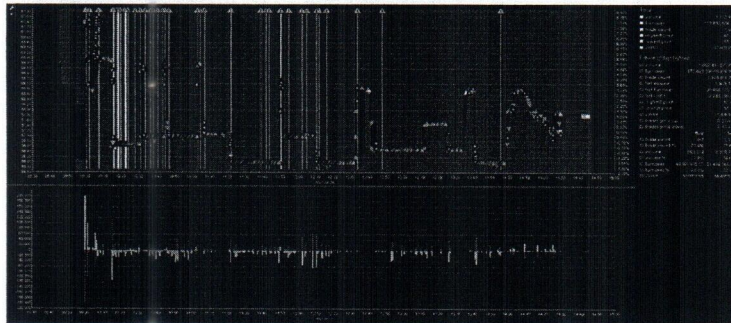


It is also found that during the aforementioned period, Mr. Md. Saif Ullah executed 23 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 25 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Md. Saif Ullah bought 94.49% of the total trades of JANATAINS shares by executing 23 of total 25 howlas from 10:29:44 to 10:30:32 on 26-08-2021. From 10:29:44 to 10:30:32, Mr. Md. Saif Ullah induced the price to rise from Tk. 59.30 to Tk. 61.20.

**29-08-2021**



It was observed in the above graph that on 29-08-2021, total number of trades of JANATAINS in the market was 1643, whereas number of trades (buy) executed by Mr. Md.

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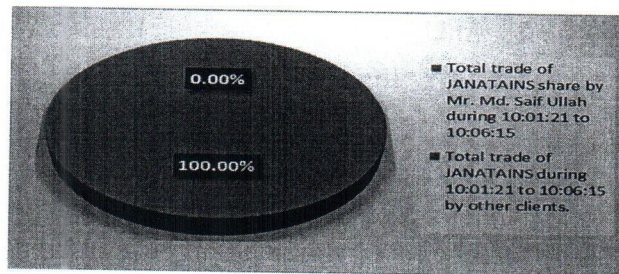
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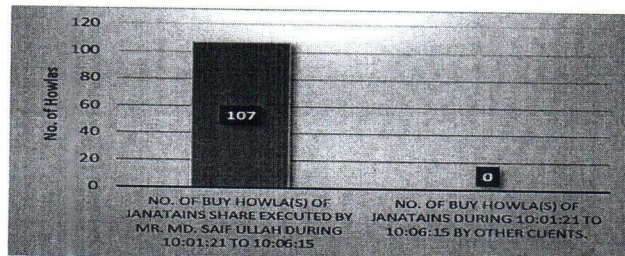
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Saif Ullah were 352 which is approximately 21.42% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 3,132,441 whereas buy volume by the said client(s) was 683,512 which is approximately 21.82% of the total traded volume in the market. It is evident that the client had significant participation in the market on 29-08-2021 in trading of JANATAINS share.

On 29-08-2021, trading of JANATAINS share was started at Tk. 61.40 which is Tk. 4.50 more than the YCP of Tk. 56.90. On that day, Mr. Md. Saif Ullah started series of trading at 10:01:21 at price Tk. 59.00 and induced the same to rise to Tk. 61.60 up to 10:06:15. It can also be observed from the above graph that Mr. Md. Saif Ullah executed significant trades during this time period. It is mentionable here that from 10:01:21 to 10:06:15, Mr. Md. Saif Ullah bought 228,174 shares of JANATAINS compared to the total traded share of 228,174. This is shown in the following Pie Chart.

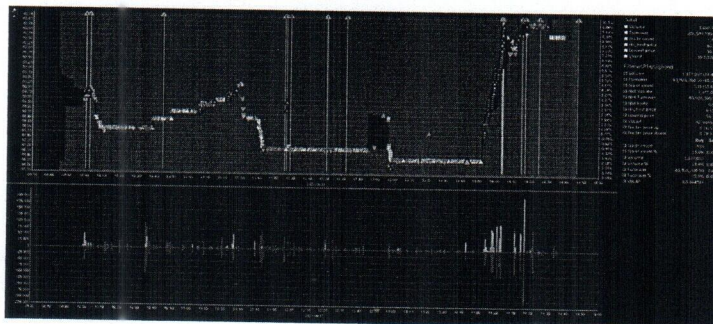


It is also found that during the aforementioned period, Mr. Md. Saif Ullah executed 107 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 107 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Md. Saif Ullah bought 100.00% of the total trades of JANATAINS shares by executing 107 of total 107 howlas from 10:01:21 to 10:06:15 on 29-08-2021. From 10:01:21 to 10:06:15, Mr. Md. Saif Ullah induced the price to rise from Tk. 59.00 to Tk. 61.60. Thus it seems that Mr. Md. Saif Ullah were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 0.90 which is approximately 1.58% higher than YCP.

31.08.2021



*Handwritten signature*

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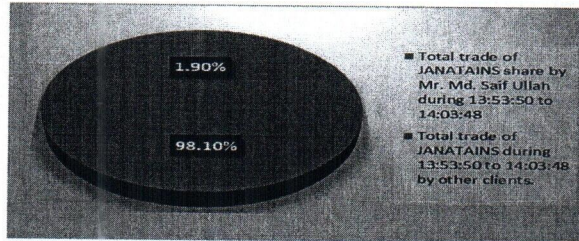
Enforcement Department

Market, Market Intermediaries and Other Affairs Section

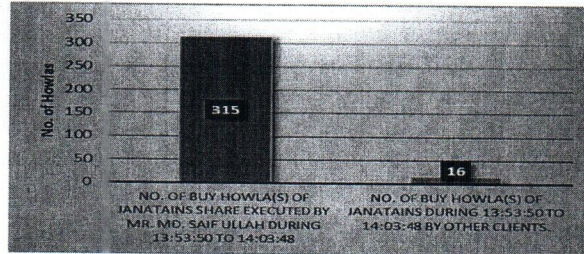
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It was observed in the above graph that on 31-08-2021, total number of trades of JANATAINS in the market was 1770, whereas number of trades (buy) executed by Mr. Md. Saif Ullah were 595 which is approximately 33.62% of the total number of trades in the market. Again, total traded volume of JANATAINS in the market on that day was 3,492,148 whereas buy volume by the said client(s) was 1,377,093 which is approximately 39.43% of the total traded volume in the market. It is evident that the client had significant participation in the market on 31-08-2021 in trading of JANATAINS share.

On 31-08-2021, trading of JANATAINS share was started at Tk. 59.40 which is Tk. 1.60 more than the YCP of Tk. 57.80. On that day, Mr. Md. Saif Ullah started series of trading at 13:53:50 at price Tk. 57.80 and induced the same to rise to Tk. 63.40 up to 14:03:48. It can also be observed from the above graph that Mr. Md. Saif Ullah executed significant trades during this time period. It is mentionable here that from 13:53:50 to 14:03:48, Mr. Md. Saif Ullah bought 545,908 shares of JANATAINS compared to the total traded share of 556,508. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Mr. Md. Saif Ullah executed 315 howlas to purchase of shares of JANATAINS compared to the total number of howlas of 331 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Mr. Md. Saif Ullah bought 98.10% of the total trades of JANATAINS shares by executing 315 of total 331 howlas from 13:53:50 to 14:03:48 on 31-08-2021. From 13:53:50 to 14:03:48, Mr. Md. Saif Ullah induced the price to rise from Tk. 57.80 to Tk. 63.40. Thus it seems that Mr. Md. Saif Ullah were actively trying to lift the price of JANATAINS share. At the end of the day price of JANATAINS share was increased by Tk. 5.10 which is approximately 8.82% higher than YCP.

#### iv) Gain/Loss of Mr. Md. Saif Ullah by trading shares of JANATAINS from 17.08.2021 to 31.08.2021:

Summary										
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
8885836	54.14	481088008.10	4904241	55.58	272565916.50	52.28	256399156.82	3981595	56.43	224688851.28

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Realized Capital gain(loss)per unit	3.30	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	6.31%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	16,166,759.68	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (31-08-2021)	62.90	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	6.47	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	11.46%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	25,753,474.22	Quantity of Stock Position x Unrealized gain (loss) per unit

As per DSE trade data, Md. Saif Ullah bought total 8,885,836 shares and sold total 4,904,241 shares of "JANATAINS" from 17.08.2021 to 31.08.2021. He traded 55.03% of total trade volume of shares of "JANATAINS" with the said BO account and realized a capital gain of BDT 16,166,759.68 by trading of shares of "JANATAINS" during the investigation period. Moreover, his unrealized gain is BDT 25,753,474.22 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 Mr. Md. Saif Ullah was involved directly and indirectly in a series of transaction of share of "JANATAINS" in order to create the appearance of active trading of the said share.

### Contravention:

Through the aforesaid activities it appears that **Mr. Md. Saif Ullah** (BOID: 1605170064096113) has violated the following:

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

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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক আগস্ট ০৩, ২০২২ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৩৩৩/২০২২/১০৪৭ স্মারকমূলে Mr. Md. Saif Ullah -কে আগস্ট ২১, ২০২২ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। শুনানীতে উপস্থিত হয়ে Mr. Md. Saif Ullah নিম্নলিখিত বক্তব্য দাখিল করেন;

*“Regarding your letter BSEC/Enforcement/3333/2022/1047 dated August 03, 2022, for showcause cum hearing notice: non-compliance with securities laws found through inquiry conducted by BSEC, please find the response of myself, Md Saif Ullah BO ID #1605170064096113, against following observations for your record and reference:*

**For Observation 1:**

*I am an active investor in the capital market and have been participating in the market since 1996. I started investing in the shares of JANATAINS in August, 2021. During the period of my holding, I have realized capital gain to increase my equity size and reinvest in the shares of JANATAINS as my analysis regarding the company's earnings, dividend policy, the shareholding structure, sectoral position, etc. led me to believe that the share price of JANATAINS was significantly undervalued and thus will provide a good return in the future. I could purchase a net of 3,981,595 shares of JANATAINS in eight (8) working days which is only 8.97% of the paidup capital of JANATAINS.*

*Unfortunately, those trading/trading patterns have been deemed as a series of transactions by the Surveillance department of DSE. I regret that my action appears as a series of trades, but my intention was never to manipulate the price of JANATAINS.*

**For Observation 2:**

*I have traded via telephonic communication with my authorized trader from home during both the lock-down period and regular period, owing to my health concern. Therefore, I didn't know that my brother was also purchasing the shares of JANATAINS. As an individual, I have never held more than 10% shares of JANATAINS.*

*As a capital market veteran, I have shared my view regarding JANATAINS in good faith with my close ones, which might generate interest regarding investment in the shares of JANATAINS by others. I have always shared my views about the capital market with my close ones but never urged or instructed anyone to invest in any specific shares.*

*I regret that my action appears inducing, but I never intended to persuade anyone in the capital market. I apologize for the inconvenience the issue caused to the inquiry committee and would like to place the matter into your kind consideration for pardon. I do regret the unintentional mistake and stating my assurance to be more cautious in the future so that these sorts of unintentional errors do not recur.”*



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যেহেতু, Mr. Md. Saif Ullah -এর উল্লিখিত বক্তব্য থেকে প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছে যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mr. Md. Saif Ullah -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Md. Saif Ullah - উপর্যুক্ত কর্মকান্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর 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;

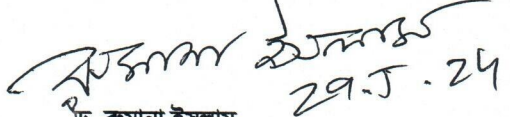
যেহেতু, Mr. Md. Saif Ullah -এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mr. Md. Saif Ullah -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 [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. Md. Saif Ullah -কে ৪০.০০ (চল্লিশ) লক্ষ টাকা অর্থদণ্ড ধার্য 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,

  
ড. রুমান ইসলাম  
কমিশনার

## বিতরণ:

১। Mr. Md. Saif Ullah  
(BOID: 1605170064096113,  
City Bank Capital Resources Limited)  
House No. 34, Road No. 04, Block- C  
Banasree, Rampura, Dhaka.