

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৮৪
তারিখঃ জানুয়ারি ৩০, ২০২৫

Mrs. Risana Karim
(BO ID # 1203710043493921,
1205590043493921, 1205590075153283)
Floralia B-1, House # 20, Road # 79
Gulshan-2, Dhaka.

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৮৩ তারিখঃ জানুয়ারি ৩০, ২০২৫ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


৩০/০২/২০২৫

মোঃ সুলতান সালাহ উদ্দিন

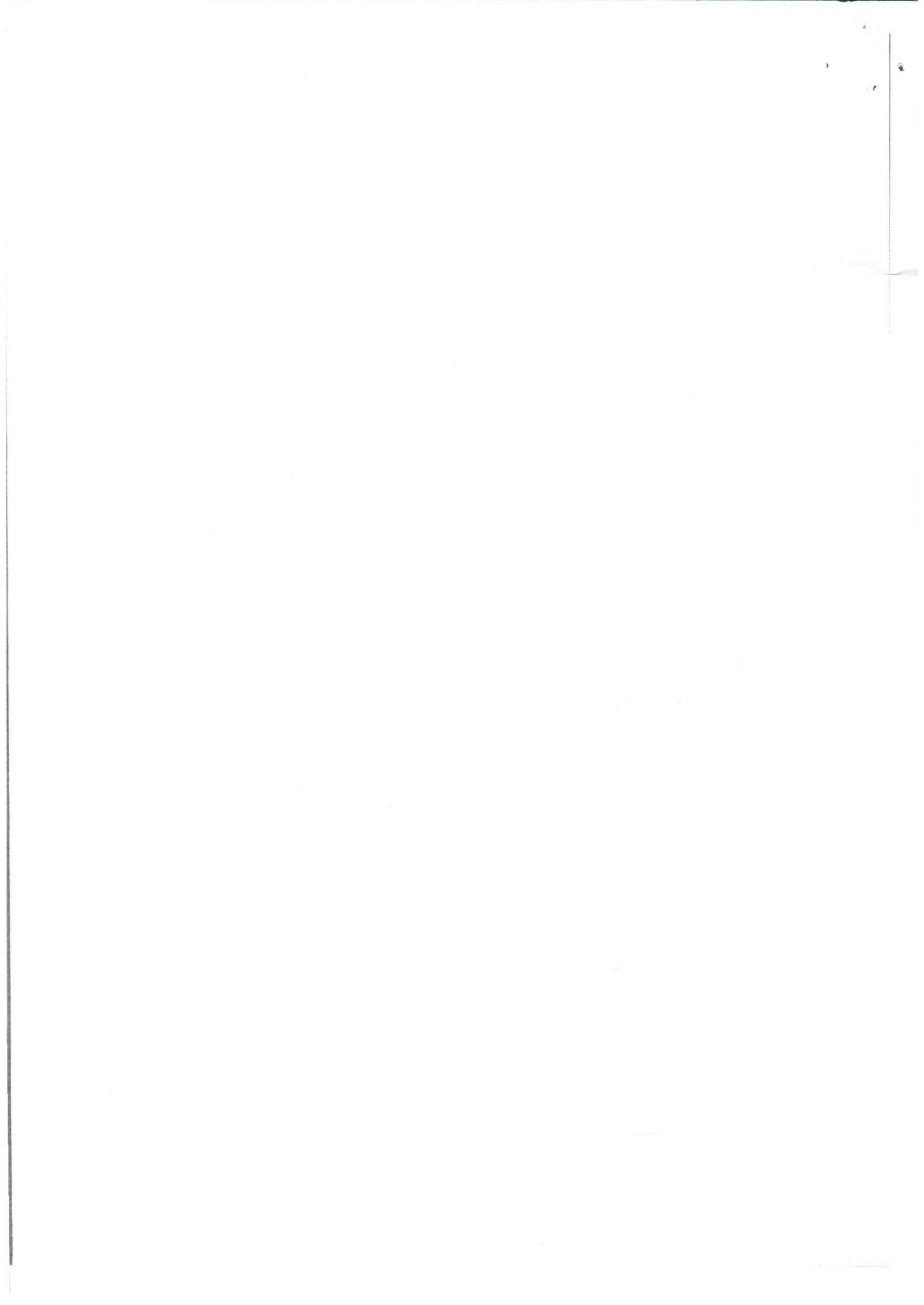
উপপরিচালক (এনফোর্সমেন্ট)

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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/MSI/2003-0170]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।



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তারিখঃ জানুয়ারি ৩০, ২০২৫

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, অক্টোবর ১২, ২০২২ তারিখের কমিশনের পত্র নং BSEC/MSI/2003-0170/134 অনুযায়ী ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ২১.০৬.২০২২ থেকে ১২.১০.২০২২ পর্যন্ত সময়ে Orion Infusion Limited (ORIONINFU)-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:

A. Top Traders:

1. Major buyers of the period (Both Public and Block Market):

The price of ORIONINFU shares was increased by Tk. 80.40 to Tk. 839.20 which was increased by 1043.78% from 21.06.2022 to 12.10.2022. Major buyers of the period were as follows (as per DSE trade data):

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	23176	Md.Sohel Alam	1601880043377493	MTB Securities Limited	3817677	2839973	6657650	68371890	9.74%
2	3371	Mohammad Ebadul Karim	1203710046187231	AB Securities Limited	2805154	2625762	5430916	68371890	7.94%
3	9726	Mohammad Ekhlashur Rahman	1601880069342424	MTB Securities Limited	2362338	2111981	4474319	68371890	6.54%
4	5058	Beacon Medicare Ltd.	1203710064190682	AB Securities Limited	1296393	1028022	2324415	68371890	3.40%
5	026	Abil - Mda	1601760000002612	AB Investment Limited	1028000	897000	1925000	68371890	2.82%
6	3214	Risana Karim	1203710043493921	AB Securities Limited	1024806	930793	1955599	68371890	2.86%
7	11776	Md. Azad Hossain Patwary	1205590068957657	UCB Stock Brokerage Limited	764065	661581	1425646	68371890	2.09%
8	11771	Md. Akter Hosen	1205590068957614	UCB Stock Brokerage Limited	686450	532596	1219046	68371890	1.78%
9	11755	Risana Karim	1205590043493921	UCB Stock Brokerage Limited	564426	533947	1098373	68371890	1.61%
10	D3386	Md. Jashim Mizi	1204780074143621	United Securities Limited	557200	15671	572871	68371890	0.84%
11	J3632	Md. Abul Kashem	1605400075149491	Janata Capital and Investment Ltd	516217	240	516457	68371890	0.76%
12	J3635	Farid Hossain	1605400075149797	Janata Capital and Investment Ltd	512410	468	512878	68371890	0.75%
13	J3636	Md. Rafiqul Islam	1605400075149901	Janata Capital and Investment Ltd	499900	270	500170	68371890	0.73%
14	9238	Tahsin Al Mueed Zaman	1601880073521315	MTB Securities Limited	475394	390619	866013	68371890	1.27%
15	D3397	Md. Mahfuzur Rahman	1204780074251631	United Securities Limited	451200	0	451200	68371890	0.66%

Findings:

- After analyzing documents, it is observed that Mr. Md. Sohel Alam (Client code # 23176 of MTB Securities Limited) was the top buyer of "ORIONINFU" share from 21.06.2022 to 12.10.2022. The said client bought 3,817,677 and sold 2,839,973 shares which is 9.74% of total traded share of "ORIONINFU" during the period. It was observed that the aforesaid client was involved with the following accounts through which they traded shares of "ORIONINFU" during the investigation period

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BO ID	Client Code	Client Name	Name of TREC Holder
1601880043377493	23176	MD SOHEL ALAM	MTB Securities Limited
1203710046187231	3371	MOHAMMAD EBADUL KARIM	AB Securities Limited
1601880046187231	10310	MOHAMMAD EBADUL KARIM	MTB Securities Limited
1203710043493921	3214	RISANA KARIM	AB Securities Limited
1205590043493921	11755	RISANA KARIM	UCB Stock Brokerage Limited
1205590075153283	11788	RISANA KARIM	UCB Stock Brokerage Limited
1203710064190682	5058	BEACON MEDICARE LTD	AB Securities Limited
1605170064190682	CM489	BEACON MEDICARE LTD	City Bank Capital Resources Limited
1601880064821881	22936	BEACON PHARMACEUTICALS LTD-EPF	MTB Securities Limited
1601880065365037	22985	BEACON PHARMACEUTICALS LTD-EGF	MTB Securities Limited
1203710048667734	7053	Beacon Pharmaceuticals Ltd	AB Securities Limited
1203710075253110	5674	NURUNNAHAR KARIM	AB Securities Limited

II. Major sellers of the period (Both Public and Block Market):

The list of major sellers of ORIONINFU shares from 21.06.2022 to 12.10.2022 are as follows (as per surveillance data):

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	23176	Md Sohel Alam	1601880043377493	MTB Securities Limited	3817677	2839973	6657650	68371890	9.74%
2	3371	Mohammad Ebadul Karim	1203710046187231	AB Securities Limited	2805154	2625762	5430916	68371890	7.94%
3	9726	Mohammd Ekhlisar Rahman	1601880069342424	MTB Securities Limited	2362338	2111981	4474319	68371890	6.54%
4	JCIL	Janata Capital & Invest. Ltd	1201530034513871	ICB Securities Trading Company Limited	73553	1101439	1174992	68371890	1.72%
5	5058	Beacon Medicare Ltd	1203710064190682	AB Securities Limited	1296393	1028022	2324415	68371890	3.40%
6	3214	Risana Karim	1203710043493921	AB Securities Limited	1024806	930793	1955599	68371890	2.86%
7	026	Abil - Mda	1601760000002612	AB Investment Limited	1028000	897000	1925000	68371890	2.82%
8	RAJ3382	Mst. Israt Jahan	1203100070177244	ICB Securities Trading Co. Ltd.	0	868500	868500	68371890	1.27%
9	11776	Md. Azad Hossain Patwary	1205590068957657	UCB Stock Brokerage Limited	764065	661581	1425646	68371890	2.09%
10	11755	Risana Karim	1205590043493921	UCB Stock Brokerage Limited	564426	533947	1098373	68371890	1.61%
11	11771	Md. Akter Hosen	1205590068957614	UCB Stock Brokerage Limited	686450	532596	1219046	68371890	1.78%
12	9196	Md. Rasel Mia	1601880073433251	MTB Securities Limited	424118	399118	823236	68371890	1.20%
13	10310	Mohammad Ebadul Karim	1601880046187231	MTB Securities Limited	423618	394774	818392	68371890	1.20%
14	9238	Tahsin Al Mueed Zaman	1601880073521315	MTB Securities Limited	475394	390619	866013	68371890	1.27%
15	13965	Bipul Mia	1204490073749364	Bank Asia Securities Limited	388905	388611	777516	68371890	1.14%

Findings:

- After analyzing documents, it is observed that Mr. Md. Sohel Alam (Client code # 23176 of MTB Securities Limited) was the top seller of "ORIONINFU" share from 21.06.2022 to 12.10.2022. The said client bought 3,817,677 and sold 2,839,973 shares which is 9.74% of total traded share of "ORIONINFU" during the period. However, the aforesaid client was involved with the accounts mentioned earlier from which they traded shares of "ORIONINFU" during the investigation period.

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B. Trade details of Md. Sohel Alam, Mohammad Ebadul Karim and their associates:

Observations- 1:

Mr. Md. Sohel Alam was the top buyer and Mohammad Ebadul Karim was the 2nd top buyer of "ORIONINFU" share for the period from 21.06.2022 to 12.10.2022. It may be mentioned that Mr. Md. Sohel Alam is the brother-in-law of Mohammad Ebadul Karim. However, the aforesaid clients were involved with the following accounts from which they traded shares of "ORIONINFU" during the investigation period. Details are as follows:

Client Code	Client Name	Name of TREC Holder	Remarks
23176	Md. Sohel Alam	MTB Securities Limited	Own
3371	Mohammad Ebadul Karim	AB Securities Limited	Mohammad Ebadul Karim is the brother-in-law of Md. Sohel Alam
10310	Mohammad Ebadul Karim	MTB Securities Limited	
3214	Risana Karim	AB Securities Limited	Daughter of Mohammad Ebadul Karim
11755	Risana Karim	UCB Stock Brokerage Limited	
11788	Risana Karim	UCB Stock Brokerage Limited	
5058	Beacon Medicare Ltd.	AB Securities Limited	Mohammad Ebadul Karim is the contact person of the BO Account and he is the Managing Director of Beacon Medicare Ltd.
CM489	Beacon Medicare Ltd.	City Bank Capital Resources Ltd.	
22936	Beacon Pharmaceuticals Ltd-EPF	MTB Securities Limited	Mohammad Ebadul Karim is the contact person of the BO Account and he is the Managing Director of Beacon Pharmaceuticals Ltd.
22985	Beacon Pharmaceuticals Ltd-EGF	MTB Securities Limited	
7053	Beacon Pharmaceuticals Ltd.	AB Securities Limited	
5674	Nurunnahar Karim	AB Securities Limited	Sister of Md. Sohel Alam and Spouse of Mohammad Ebadul Karim

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Individual Trade Patterns, Trade monitoring screenshots, Effects of "ORIONINFU" at DSE in public market by the said client and gain and loss statement of Md. Sohel Alam, Mohammad Ebadul Karim and their associates are given below (as per DSE trade data):

Date	Code #23176				Code #3371				Code #10310				Code #3214				Code #11755				Code #11788			
	BO ID # 1601880043377493				BO ID # 1203710046187231				BO ID # 1601880046187231				BO ID # 1203710043493921				BO ID # 1205590043493921				BO ID # 1205590075153283			
	MD. SOHEL ALAM				MOHAMMAD EBADUL KARIM				MOHAMMAD EBADUL KARIM				RISANA KARIM				RISANA KARIM				RISANA KARIM			
	MTB Securities Limited				AB Securities Limited				MTB Securities Limited				AB Securities Limited				UCB Stock Brokerage Limited				UCB Stock Brokerage Limited			
	Buy Qty	Rate	Sale Qty	Rate	Buy Qty	Rate	Sale Qty	Rate	Buy Qty	Rate	Sale Qty	Rate	Buy Qty	Rate	Sale Qty	Rate	Buy Qty	Rate	Sale Qty	Rate	Buy Qty	Rate	Sale Qty	Rate
21-06-22	0	0.00	0	0.00	10000	80.93	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-06-22	0	0.00	0	0.00	3100	87.28	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-06-22	141783	85.87	0	0.00	12123	85.04	8000	84.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-06-22	60062	84.63	0	0.00	4982	84.45	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-06-22	0	0.00	0	0.00	21771	84.09	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-06-22	0	0.00	0	0.00	72839	85.05	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-06-22	32623	87.54	0	0.00	74156	86.56	25868	87.12	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-06-22	0	0.00	22385	86.70	186728	87.42	100	87.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-07-22	3000	86.20	0	0.00	71735	87.52	23664	86.44	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-07-22	101000	89.50	0	0.00	1145	87.20	129264	89.07	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-07-22	0	0.00	0	0.00	179157	93.42	27938	92.57	0	0.00	0	0.00	0	0.00	0	0.00	40000	92.78	0	0.00	0	0.00	0	0.00
06-07-22	35000	95.07	0	0.00	16421	93.30	16437	94.91	0	0.00	0	0.00	91273	94.86	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-07-22	0	0.00	262295	95.66	195517	97.19	76000	96.49	0	0.00	0	0.00	18160	96.72	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-07-22	50000	96.00	0	0.00	19965	94.76	60800	95.97	0	0.00	0	0.00	4100	95.59	9000	96.30	0	0.00	0	0.00	0	0.00	0	0.00
17-07-22	37341	96.98	0	0.00	27620	96.85	5000	98.70	0	0.00	0	0.00	0	0.00	28000	97.46	0	0.00	0	0.00	0	0.00	0	0.00
18-07-22	44689	100.56	0	0.00	80162	99.40	106530	100.06	0	0.00	0	0.00	18000	99.51	30000	100.76	0	0.00	0	0.00	0	0.00	0	0.00
19-07-22	0	0.00	0	0.00	46000	98.23	2951	99.30	0	0.00	0	0.00	19000	98.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-07-22	0	0.00	0	0.00	3000	99.50	30000	102.12	0	0.00	0	0.00	1110	98.61	21000	101.57	22000	106.13	22000	105.61	0	0.00	0	0.00
21-07-22	50343	106.75	0	0.00	118230	107.13	71000	106.16	0	0.00	0	0.00	3000	105.88	13000	107.15	0	0.00	0	0.00	0	0.00	0	0.00
24-07-22	54000	110.77	0	0.00	36331	108.34	41331	110.40	0	0.00	0	0.00	50000	107.22	41000	109.36	20000	108.10	20000	109.30	0	0.00	0	0.00
25-07-22	0	0.00	0	0.00	21791	107.60	52822	107.75	0	0.00	0	0.00	33875	108.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-07-22	143586	109.21	50000	108.54	53175	108.25	0	0.00	0	0.00	0	0.00	0	0.00	38002	109.47	39000	108.51	39000	109.06	0	0.00	0	0.00
27-07-22	0	0.00	0	0.00	0	0.00	25000	109.91	0	0.00	0	0.00	10000	107.31	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-07-22	0	0.00	0	0.00	15550	104.77	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10004	104.70	10004	104.70	0	0.00	0	0.00
31-07-22	0	0.00	0	0.00	16820	108.03	55825	112.11	0	0.00	0	0.00	2600	107.30	20600	113.89	29996	116.26	29996	111.99	0	0.00	0	0.00
01-08-22	376968	118.33	0	0.00	44257	116.18	30500	118.17	0	0.00	0	0.00	18000	116.66	12000	118.23	0	0.00	0	0.00	0	0.00	0	0.00
02-08-22	12416	117.57	0	0.00	52000	116.02	151000	117.90	0	0.00	0	0.00	25441	116.32	26091	117.60	0	0.00	0	0.00	0	0.00	0	0.00
03-08-22	78319	125.07	0	0.00	11505	123.08	175100	125.19	0	0.00	0	0.00	2000	118.25	25000	119.97	40000	119.93	40000	124.35	0	0.00	0	0.00
04-08-22	150700	132.20	0	0.00	0	0.00	31204	130.79	0	0.00	0	0.00	60069	127.95	36865	128.70	0	0.00	0	0.00	0	0.00	0	0.00
07-08-22	0	0.00	180000	131.90	320027	130.42	0	0.00	0	0.00	0	0.00	0	0.00	21986	130.25	38000	129.38	38000	130.28	0	0.00	0	0.00
08-08-22	100000	132.40	0	0.00	0	0.00	115000	132.50	0	0.00	0	0.00	117440	135.22	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-08-22	57487	133.83	0	0.00	163006	134.65	0	0.00	0	0.00	0	0.00	0	0.00	42084	133.98	20000	133.77	20000	134.03	0	0.00	0	0.00
11-08-22	20000	131.80	0	0.00	26920	130.65	24237	133.01	0	0.00	0	0.00	52921	131.55	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-08-22	87599	130.10	0	0.00	12100	130.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	40000	127.51	20000	130.30	0	0.00	0	0.00
16-08-22	0	0.00	0	0.00	0	0.00	60000	131.92	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-08-22	1088	143.61	258	144.00	40595	143.57	0	0.00	0	0.00	0	0.00	0	0.00	15000	143.21	39000	145.76	40000	142.26	0	0.00	0	0.00
21-08-22	3352	158.43	0	0.00	0	0.00	69000	150.32	0	0.00	0	0.00	6300	149.35	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-08-22	10000	173.80	0	0.00	24050	163.29	0	0.00	0	0.00	0	0.00	0	0.00	36000	168.45	39000	166.15	38000	172.54	0	0.00	0	0.00
23-08-22	0	0.00	0	0.00	0	0.00	31000	186.23	0	0.00	0	0.00	2000	185.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-08-22	59910	200.30	0	0.00	9797	194.80	103833	198.65	0	0.00	0	0.00	62000	194.87	0	0.00	36000	191.64	35000	198.95	0	0.00	0	0.00
25-08-22	0	0.00	0	0.00	8513	212.50	0	0.00	0	0.00	0	0.00	0	0.00	85000	209.36	0	0.00	500	220.00	0	0.00	0	0.00
28-08-22	145245	230.11	35	222.40	135501	234.07	3134	236.44	0	0.00	0	0.00	75627	236.50	0	0.00	19500	235.25	0	0.00	0	0.00	0	0.00
29-08-22	16557	244.95	0	0.00	0	0.00	71006	237.22	0	0.00	0	0.00	0	0.00	0	0.00	753	236.94	18000	244.40	0	0.00	0	0.00
30-08-22	154939	264.25	0	0.00	0	0.00	36130	256.96	0	0.00	0	0.00	36085	261.12	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-08-22	86000	287.56	0	0.00	280452	287.16	0	0.00	0	0.00	0	0.00	0	0.00	11000	287.72	0	0.00	0	0.00	0	0.00	0	0.00
01-09-22	0	0.00	0	0.00	187743	306.69	0	0.00	0	0.00	0	0.00	9200	307.47	0	0.00	44153	301.02	42753	313.80	83652	295.71	0	0.00
04-09-22	298292	313.18	0	0.00	0	0.00	14410	314.74	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-09-22	40100	325.88	0	0.00	0	0.00	6000	326.25	0	0.00	0	0.00	4800	328.20	0	0.00	13000	317.25	13400	308.77	500	319.10	0	0.00
06-09-22	0	0.00	0	0.00	0	0.00	6000	354.50	98703	354.90	0	0.00	185	332.10	20000	341.77	27000	336.38	6485	354.88	0	0.00	0	0.00
07-09-22	140000	382.83	0	0.00	2000	346.20	0	0.00	20000	385.40	0	0.00	0	0.00	16800	372.69	0	0.00	0	0.00	0	0.00	0	0.00
08-09-22	0	0.00	0	0.00	0	0.00	0	0.00	78052	416.10	0	0.00	1000	418.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-09-22	544752	428.52	0	0.00	17230	410.46	7991	429.02	0	0.00	0	0.00	45232	412.88	1000</									

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i. Effects of "ORIONINFU" at DSE (both Public Market and Block Market) by Md. Sohel Alam, Mohammad Ebadul Karim and their associates:

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market					Client's Total (%)
	Qty.	Price	Amount	Qty.	Price	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 (%)	
21-06-22	10000	80.93	809307.80	0	0.00	0.00	0.00	0.00	10000	80.93	809307.80	334986	82.10	2.11%	2.99%	0.00%	1.99%
22-06-22	3100	82.28	255059.30	0	0.00	0.00	0.00	0.00	13100	81.25	1064367.10	177510	83.10	1.22%	1.75%	0.00%	1.75%
23-06-22	153916	85.81	13207339.30	8000	84.61	676900.00	85.45	683609.06	159016	85.45	13588097.34	724333	85.30	2.65%	21.25%	1.10%	23.35%
26-06-22	109934	84.55	9295185.10	0	0.00	0.00	0.00	0.00	268950	85.08	22883282.44	230949	84.40	-1.06%	47.60%	0.06%	47.60%
27-06-22	82771	84.09	6960530.60	0	0.00	0.00	0.00	0.00	351721	84.85	29843813.04	135884	84.20	-0.24%	60.91%	0.00%	60.91%
28-06-22	72839	85.05	6194966.90	0	0.00	0.00	0.00	0.00	424560	84.89	36038779.94	279044	85.10	1.07%	26.10%	0.00%	26.10%
29-06-22	106779	86.86	9274727.40	25868	87.12	2253559.00	85.28	2206067.70	505471	85.28	43107439.63	770145	87.20	2.47%	13.86%	3.36%	17.22%
30-06-22	186728	87.42	16324191.60	39485	86.40	3411615.50	85.86	3390149.31	652714	85.86	56041481.93	465637	87.30	0.11%	40.10%	8.48%	48.58%
03-07-22	74735	87.46	6536657.20	23664	86.44	2045569.60	86.02	2035674.09	703785	86.02	60542465.03	329656	87.60	0.34%	22.67%	7.18%	29.85%
04-07-22	102145	89.48	9139429.90	149264	89.00	13283933.00	86.46	12905585.31	656666	86.46	56776309.63	594468	89.80	2.51%	17.18%	25.11%	42.29%
05-07-22	219157	93.30	20447721.20	27938	92.57	2586117.60	88.17	2463380.13	847885	88.17	74760650.70	779820	93.40	4.01%	28.10%	3.58%	31.69%
06-07-22	301429	94.20	28394845.40	16437	94.91	1560100.50	89.75	1475286.03	1132877	89.75	101680210.07	1725375	95.00	1.71%	17.47%	0.95%	18.42%
07-07-22	213877	97.15	20777269.50	338295	95.85	32424529.40	90.93	30760445.52	1008459	90.93	91697034.05	1282519	96.60	1.68%	16.68%	26.38%	43.05%
14-07-22	74065	95.64	7083893.00	69800	96.02	6701960.00	91.25	6369289.46	1012724	91.25	92411637.58	519240	95.70	0.21%	14.26%	13.44%	27.71%
17-07-22	64963	96.92	6296485.70	33000	97.65	3222460.00	91.59	3022554.85	1044687	91.59	95685568.43	767784	98.10	2.51%	8.46%	4.30%	12.76%
18-07-22	142851	99.78	14253451.30	136530	100.21	13681929.30	92.58	12639573.95	1051008	92.58	97299445.79	1383331	100.20	2.14%	10.33%	9.87%	20.20%
19-07-22	75000	98.40	7380150.00	2951	99.30	293034.30	92.97	274340.40	1123057	92.97	104405255.38	621949	98.40	-1.80%	12.06%	0.47%	12.53%
20-07-22	26110	105.05	2742884.90	73000	103.01	7519978.20	93.24	6806507.88	1076167	93.24	100341632.40	1634961	105.50	7.22%	1.60%	4.46%	6.06%
21-07-22	171573	106.98	18354516.60	84000	106.49	8944879.30	95.13	7990828.63	1163740	95.13	110705320.37	1201045	107.10	1.52%	14.29%	6.99%	21.28%
24-07-22	572229	110.20	63060558.60	102331	109.89	11244736.50	100.10	10243060.88	1633638	100.10	163522818.09	2162191	108.30	1.12%	26.47%	4.73%	31.20%
25-07-22	93666	107.45	10064063.70	166557	106.70	17771034.80	100.50	16738287.11	1560747	100.50	156848594.68	1057758	107.80	-0.46%	8.86%	15.75%	24.60%
26-07-22	235741	108.88	25667106.20	159429	108.90	17362539.40	101.60	16197322.60	1637059	101.60	166318378.29	1045216	108.90	1.02%	22.55%	15.25%	37.81%
27-07-22	205200	107.18	21993050.00	39294	108.67	4270072.40	102.22	4016541.25	1802965	102.22	184294887.04	803203	106.80	-1.93%	25.55%	4.89%	30.44%
28-07-22	60554	104.78	6345076.80	10004	104.70	1047418.80	102.30	1023419.78	1853515	102.30	189616544.06	336194	104.70	-1.97%	18.01%	2.98%	20.99%
31-07-22	49416	112.99	5583433.20	106421	112.42	11963994.50	102.58	10916516.04	1796510	102.58	184283461.22	1645491	116.30	11.08%	3.00%	6.47%	9.47%
01-08-22	439225	118.04	51847012.90	219940	118.68	26102709.50	105.62	23229289.91	2015795	105.62	212901184.21	1612628	117.70	1.20%	27.24%	13.64%	40.88%
02-08-22	257857	116.72	30098332.00	177091	117.85	20871052.50	106.88	18916831.07	2096561	106.88	224072685.14	1317898	117.10	-0.51%	19.57%	13.44%	33.00%
03-08-22	132844	123.23	16370777.80	286505	124.12	35506660.80	107.85	30899838.45	1942900	107.85	209543624.49	1621332	125.50	7.17%	8.19%	17.67%	25.86%
04-08-22	210769	130.99	27608106.50	218069	131.41	28655884.80	110.12	24012715.43	1935600	110.12	213139015.56	1354912	132.30	5.42%	15.56%	16.09%	31.65%
07-08-22	538022	130.84	70393999.40	239986	131.49	31556465.60	114.62	27507822.18	2236366	114.62	256025192.77	1254586	131.40	-0.68%	42.88%	19.13%	62.01%
08-08-22	219577	132.83	29166915.40	360736	132.81	47910937.10	116.25	41936456.53	2092477	116.25	243255651.64	1291450	133.90	1.90%	17.00%	27.93%	44.93%
10-08-22	272843	134.02	36566062.60	62084	134.00	8318986.30	118.30	7344651.59	2303236	118.30	272477062.05	862063	133.70	-0.15%	31.65%	7.20%	38.85%
11-08-22	277252	130.64	36220800.30	144237	127.09	18331797.50	119.63	17254741.61	2436251	119.63	291443121.34	1353321	130.50	-2.39%	20.49%	10.66%	31.14%
14-08-22	139669	129.37	18068848.70	20900	130.30	2606000.00	120.16	2403117.88	2555920	120.16	307108852.17	557873	129.10	-1.07%	25.04%	3.59%	28.62%
16-08-22	0	0.00	0.00	60000	131.92	7915150.00	120.16	7209353.63	2495920	120.16	299899498.54	1352919	141.30	9.45%	0.00%	4.43%	4.43%
17-08-22	80673	144.63	11667992.40	75258	142.71	10739861.60	120.92	9100368.68	2501335	120.92	302467122.26	762354	145.80	3.18%	10.58%	9.87%	20.45%
21-08-22	9652	152.51	1471997.70	69000	150.32	10371897.30	121.04	8352044.28	2441987	121.04	295587105.68	1370333	158.10	8.44%	0.70%	5.04%	5.74%
22-08-22	73050	166.25	12144771.50	90500	168.99	15293767.50	122.36	11073290.33	2424537	122.36	296658586.85	1367866	173.90	9.99%	5.34%	6.62%	11.96%
23-08-22	6660	185.83	1237596.00	31000	186.23	5773120.00	122.58	398450.59	2400197	122.58	294097732.27	1076925	191.20	9.95%	0.62%	2.88%	3.50%
24-08-22	167707	196.11	32889463.20	138333	198.73	27589676.70	127.34	17678169.80	2429071	127.34	309308725.67	1683329	200.00	4.60%	9.96%	8.25%	18.21%
25-08-22	8513	212.50	1809017.00	85500	210.02	17956893.60	127.63	10912672.06	2352084	127.63	300205065.61	897663	220.00	10.00%	0.95%	9.52%	10.47%
28-08-22	375975	233.09	87635854.00	98529	203.30	20031125.80	142.17	14007606.86	2629530	142.17	373833312.75	1952979	231.10	5.05%	19.25%	5.05%	24.30%
29-08-22	81810	218.11	17843628.50	484906	216.23	104850270.00	144.16	9008942.47	2226434	144.16	321627999.07	1373157	244.20	5.67%	5.96%	35.31%	41.27%
30-08-22	265494	257.05	68245550.90	611630	227.59	139202347.00	146.47	96699115.10	1880298	146.47	294181234.88	1274144	265.50	8.72%	20.84%	48.00%	68.84%
31-08-22	439952	287.18	126346452.30	11000	287.72	3164950.00	154.74	1993666.44	2099250	154.74	418534020.74	1270924	288.70	8.74%	34.62%	0.87%	35.48%
01-09-22	348896	303.23	105794124.80	298753	283.85	83889391.40	159.75	98348263.60	2462983	159.75	465989881.94	2090917	310.30	7.48%	16.69%	14.14%	30.83%
04-09-22	377275	312.66	117958424.20	417718	284.29	119772985.60	163.43	30044777.88	2321950	163.43	494913278.86	1943211	313.60	1.06%	19.42%	21.50%	40.91%
05-09-22	58400	324.09	18926942.10	19000	314.17	6000090.00	163.58	4387899.64	2360950	163.58	509652391.61	828902	326.40	4.08%	7.05%	2.34%	9.39%

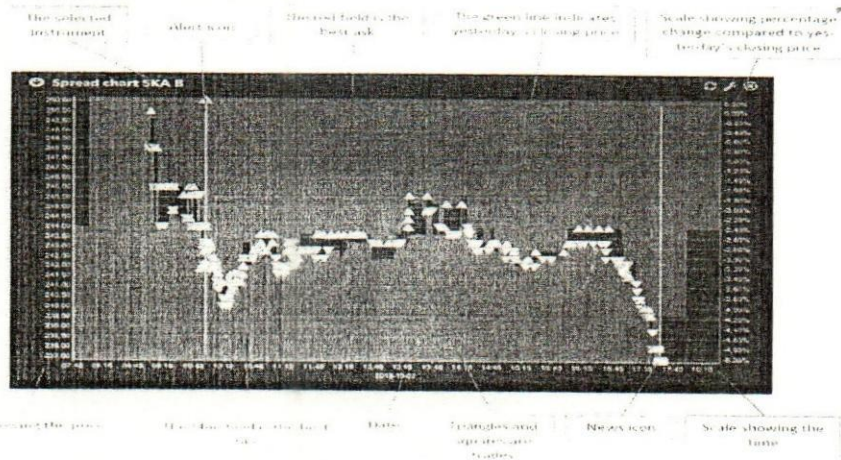
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06-09-22	125888	350.89	44173280.70	255485	304.14	77703854.30	222.70	56897213.20	2231353	222.70	496928459.11	1155440	354.40	8.58%	10.90%	22.11%	33.01%
07-09-22	274750	378.22	103914811.10	150000	329.58	49437128.80	239.75	35962803.82	2356103	239.75	564880466.39	1490653	385.40	8.75%	18.43%	10.06%	38.49%
08-09-22	176052	398.80	70209947.60	515990	356.87	184142970.00	250.81	129415577.92	2016165	250.81	505674836.07	1455825	419.00	8.72%	12.09%	35.44%	47.54%
11-09-22	607224	426.84	259190273.30	298491	385.72	115132971.70	291.56	87026876.82	2324898	291.56	677838232.55	1357765	407.60	-2.72%	44.72%	21.98%	66.71%
12-09-22	218477	399.62	87308814.60	100000	372.50	37250000.00	300.84	30083925.77	2443375	300.84	735063121.37	675535	400.80	-1.67%	32.34%	14.80%	47.14%
13-09-22	142124	401.30	57034847.20	141625	378.16	53556309.10	306.36	43388481.22	2443874	306.36	748709487.36	805037	395.30	-1.37%	17.65%	17.59%	35.25%
14-09-22	17000	428.82	7289882.50	711123	364.91	259493167.20	307.21	218462440.54	1749751	307.21	537536929.32	1304047	429.80	8.73%	1.30%	54.53%	55.84%
15-09-22	69480	467.40	32474812.00	9374	455.76	4272282.00	313.33	2937114.67	1809857	313.33	567074626.65	464646	467.40	8.75%	14.95%	2.02%	16.97%
18-09-22	115420	502.85	58039117.90	180250	436.43	78666320.00	324.69	58524956.39	1745027	324.69	566588788.16	1437759	508.20	8.73%	8.03%	12.54%	20.56%
19-09-22	134977	545.48	73626588.40	100599	477.17	48003079.60	340.54	34257920.02	1779405	340.54	605957456.54	414861	546.30	7.50%	32.54%	24.25%	56.78%
20-09-22	132492	585.05	77513825.00	11457	584.23	6693558.00	357.48	4095686.36	1900440	357.48	679375595.18	511515	583.10	6.74%	25.90%	2.24%	28.14%
21-09-22	315955	614.56	194174626.10	8490	586.59	4980145.90	394.13	3346173.12	2307905	394.13	870204048.16	782367	603.50	3.50%	40.38%	1.09%	41.47%
22-09-22	19429	579.70	11263010.90	118857	585.56	69598114.00	395.75	47037637.93	2108477	395.75	834429421.13	426402	575.60	-4.62%	4.56%	27.87%	32.43%
25-09-22	114706	567.41	65085086.10	40450	572.85	23171712.00	404.61	16366336.83	2182733	404.61	883148170.40	413576	565.70	-1.72%	27.74%	9.78%	37.52%
26-09-22	38630	569.42	21996587.50	0	0.00	0.00	0.00	0.00	2221363	407.47	905144757.90	210776	570.30	0.81%	18.33%	0.00%	18.33%
27-09-22	37156	568.32	21116512.80	82618	548.19	45289982.50	410.12	33883201.19	2175901	410.12	892378069.51	294784	570.40	0.02%	12.60%	28.03%	40.63%
28-09-22	67194	562.93	37825438.00	3000	570.00	1710000.00	414.70	1244089.32	2240095	414.70	928959418.19	295591	564.60	-1.02%	22.73%	1.01%	23.75%
29-09-22	1008	566.09	570620.00	41223	552.94	22794047.20	414.76	17097838.33	2199880	414.76	912432199.87	183670	584.10	3.45%	0.55%	22.44%	22.99%
02-10-22	8000	618.49	4947908.00	62600	559.14	35002410.00	415.50	26010469.21	2145280	415.50	891369638.66	282499	618.50	5.89%	2.83%	22.16%	24.99%
03-10-22	64193	649.42	41688420.00	6580	640.76	4216189.00	422.30	2778726.88	2202893	422.30	930279331.78	308072	652.50	5.50%	20.84%	2.14%	22.97%
04-10-22	9341	699.69	6535833.70	59341	618.94	36728477.40	423.47	25129144.90	2152893	423.47	911686020.58	425765	701.40	7.49%	2.19%	13.94%	16.13%
06-10-22	90	740.20	66618.00	25000	736.52	18413115.20	423.48	10587085.90	2127983	423.48	901165552.68	246954	753.70	7.46%	0.04%	10.12%	10.16%
10-10-22	51519	790.85	40743781.70	122473	742.44	90929107.90	432.17	52928816.72	2057029	432.17	888980517.65	555119	799.70	6.10%	9.28%	22.06%	31.34%
11-10-22	8797	850.60	7482701.20	10000	840.63	8406309.40	433.95	4339490.45	2055826	433.95	892123728.41	191924	859.60	7.49%	4.58%	5.21%	9.79%
12-10-22	6363	915.39	5824641.00	18900	887.51	16774029.90	435.43	8229713.27	2043289	435.43	889718656.14	344616	919.60	6.98%	1.85%	5.48%	7.33%
Total	10947158	136.30	2586852257.00	8903869	252.27	2246147181.80	190.61	1697133600.86	2043289	435.43	889718656.14						

ii. Trade monitoring screenshots of Md. Sohel Alam, Mohammad Ebadul Karim and their associates (public market):

IED collected Trade monitoring screenshots from Surveillance Department on some trading date(s) where appearance of active trading of Md. Sohel Alam, Mohammad Ebadul Karim and their associates were observed which influenced the price of ORIONINFU.

The details of the graphs are given below:



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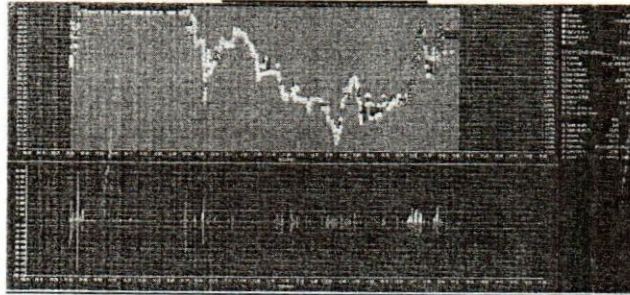
▲ Green triangle represents trade of **ORIONINFU** by Md. Sohel Alam, Mohammad Ebadul Karim and their associates

△ White triangle represents trade of **ORIONINFU** by other clients

After scrutinizing the trade monitoring screenshots collected from Surveillance Department, it is found that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were involved in trading of shares of **ORIONINFU** which influenced price of the said shares on several dates:

BOIDs: 1601880043377493; 1203710046187231; 1601880046187231; 1203710043493921;
1205590043493921; 1205590075153283; 1203710064190682; 1605170064190682;
1601880064821881; 1601880065365037; 1203710048667734; 1203710075253110
(Combined)

Date: 28-08-2022



It was observed in the above graph that on 28-08-2022, total number of trades of **ORIONINFU** in the market was 3303, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 525 which is approximately 15.89% of the total number of trades in the market. Again, total traded volume of **ORIONINFU** in the market on that day was 1,389,879 whereas buy volume by the said client(s) was 375,975 which is approximately 27.05% of the total traded volume in the market.

On 28-08-2022, trading of **ORIONINFU** share was started at Tk. 227.90 which is Tk. 7.90 more than the YCP of Tk. 220.00. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:26:16 at price Tk. 220.60 and induced the same to rise to Tk. 238.00 up to 13:35:27. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:26:16 to 13:35:27, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 170,040 shares of **ORIONINFU** compared to the total traded share of 205,672. This is shown in the following Pie Chart.



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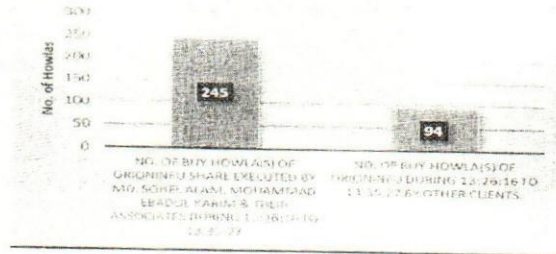
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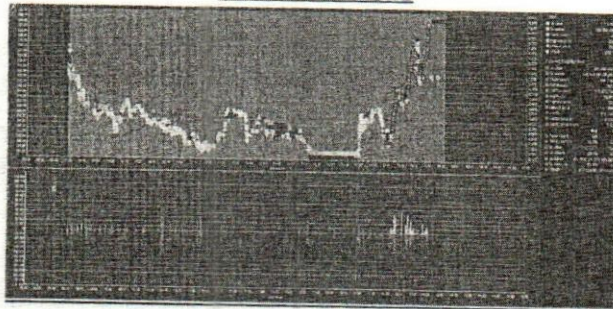
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 245 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 339 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 82.68% of the total trades of ORIONINFU shares by executing 245 of total 339 howlas from 13:26:16 to 13:35:27 on 28-08-2022. From 13:26:16 to 13:35:27, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 220.60 to Tk. 238.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share. At the end of the day price of ORIONINFU share was increased by Tk. 11.10 which is approximately 5.05% higher than YCP.

Date: 04-09-2022



It was observed in the above graph that on 04-09-2022, total number of trades of ORIONINFU in the market was 4000, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 649 which is approximately 16.23% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 1,539,903 whereas buy volume by the said client(s) was 377,275 which is approximately 24.50% of the total traded volume in the market.

On 04-09-2022, trading of ORIONINFU share was started at Tk. 324.00 which is Tk. 13.70 more than the YCP of Tk. 310.30. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:23:16 at price Tk. 292.50 and induced the same to rise to Tk. 330.00 up to 13:38:33. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:23:16 to 13:38:33, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 276,508 shares of ORIONINFU compared to the total traded share of 316,360. This is shown in the following Pie Chart.

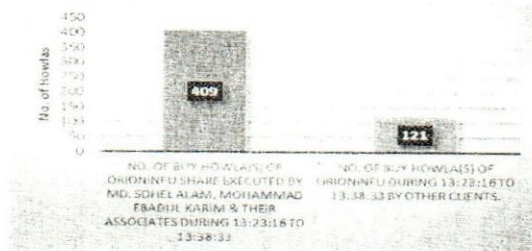
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■ Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 13:23:16 to 13:38:33

■ Total trade of ORIONINFU during 13:23:16 to 13:38:33 by other clients

It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 409 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 530 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 87.40% of the total trades of ORIONINFU shares by executing 409 of total 530 howlas from 13:23:16 to 13:38:33 on 04-09-2022. From 13:23:16 to 13:38:33, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 292.50 to Tk. 330.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:44:42 at price Tk. 312.20 and induced the same to rise to Tk. 334.90 up to 13:49:56. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:44:42 to 13:49:56, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 58,597 shares of ORIONINFU compared to the total traded share of 77,091. This is shown in the following Pie Chart.

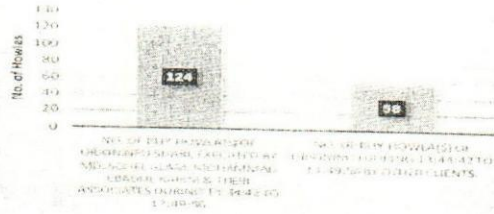


■ Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 13:44:42 to 13:49:56

■ Total trade of ORIONINFU during 13:44:42 to 13:49:56 by other clients

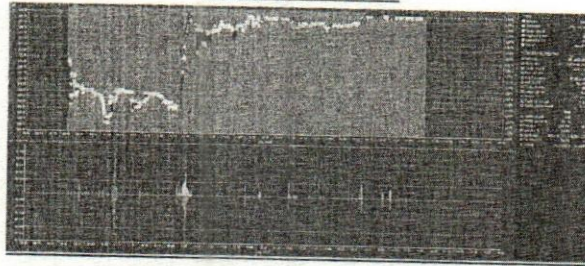
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 124 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 182 as shown in the following Bar Chart.

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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 76.01% of the total trades of ORIONINFU shares by executing 124 of total 182 howlas from 13:44:42 to 13:49:56 on 04-09-2022. From 13:44:42 to 13:49:56, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 312.20 to Tk. 334.90. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Date: 07-09-2022



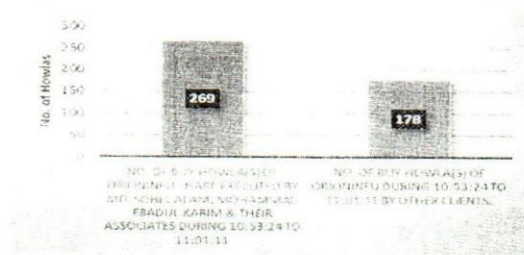
It was observed in the above graph that on 07-09-2022, total number of trades of ORIONINFU in the market was 2876, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 440 which is approximately 15.30% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 809,923 whereas buy volume by the said client(s) was 274,750 which is approximately 33.92% of the total traded volume in the market. It is evident that the client had significant participation in the market on 07-09-2022 in trading of ORIONINFU share.

On 07-09-2022, trading of ORIONINFU share was started at Tk. 368.70 which is Tk. 14.30 more than the YCP of Tk. 354.40. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:53:24 at price Tk. 354.60 and induced the same to rise to Tk. 385.00 up to 11:01:11. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 10:53:24 to 11:01:11, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 144,187 shares of ORIONINFU compared to the total traded share of 184,118. This is shown in the following Pie Chart.

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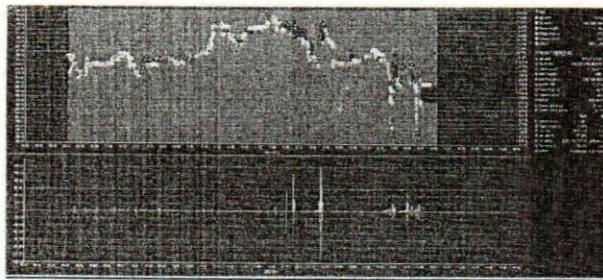


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 269 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 447 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 78.31% of the total trades of ORIONINFU shares by executing 269 of total 447 howlas from 10:53:24 to 11:01:11 on 07-09-2022. From 10:53:24 to 11:01:11, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 354.60 to Tk. 385.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share. At the end of the day price of ORIONINFU share was increased by Tk. 31.00 which is approximately 8.75% higher than YCP.

Date: 11-09-2022



It was observed in the above graph that on 11-09-2022, total number of trades of ORIONINFU in the market was 4040, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 1067 which is approximately 26.41% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 1,054,222 whereas buy volume by the said client(s) was 607,224 which is approximately 57.60% of the total traded volume in the market. It is evident that the client had significant participation in the market on 11-09-2022 in trading of ORIONINFU share.

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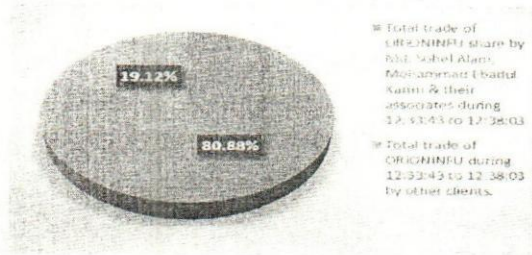
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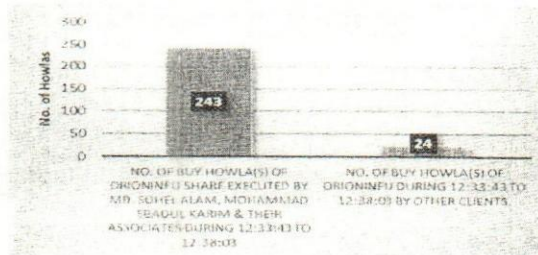
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On 11-09-2022, trading of ORIONINFU share was started at Tk. 420.00 which is Tk. 1.00 more than the YCP of Tk. 419.00. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 12:33:43 at price Tk. 415.40 and induced the same to rise to Tk. 435.00 up to 12:38:03. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 12:33:43 to 12:38:03, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 216,878 shares of ORIONINFU compared to the total traded share of 268,138. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 243 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 267 as shown in the following Bar Chart.



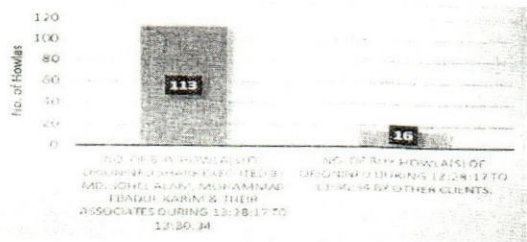
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 80.88% of the total trades of ORIONINFU shares by executing 243 of total 267 howlas from 12:33:43 to 12:38:03 on 11-09-2022. From 12:33:43 to 12:38:03, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 415.40 to Tk. 435.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:28:17 at price Tk. 392.10 and induced the same to rise to Tk. 422.50 up to 13:30:34. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:28:17 to 13:30:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 40,710 shares of ORIONINFU compared to the total traded share of 43,530. This is shown in the following Pie Chart.

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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 113 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 129 as shown in the following Bar Chart.



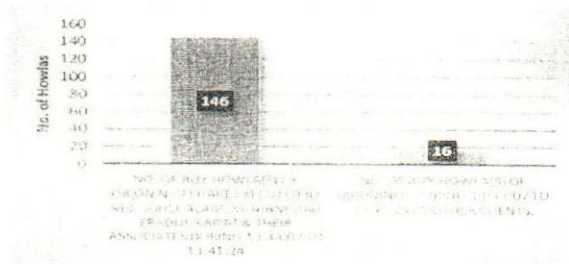
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 93.52% of the total trades of ORIONINFU shares by executing 113 of total 129 howlas from 13:28:17 to 13:30:34 on 11-09-2022. From 13:28:17 to 13:30:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 392.10 to Tk. 422.50. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:33:07 at price Tk. 406.40 and induced the same to rise to Tk. 417.80 up to 13:41:24. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:33:07 to 13:41:24, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 45,000 shares of ORIONINFU compared to the total traded share of 46,381. This is shown in the following Pie Chart.



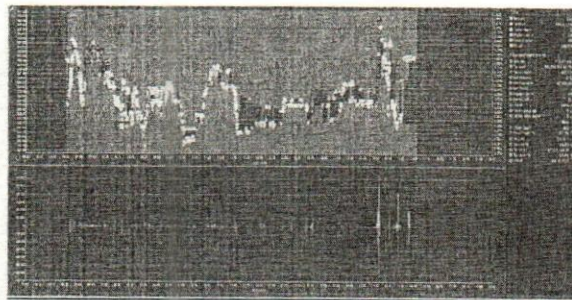
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 146 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 162 as shown in the following Bar Chart.

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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 97.02% of the total trades of ORIONINFU shares by executing 146 of total 162 howlas from 13:33:07 to 13:41:24 on 11-09-2022. From 13:33:07 to 13:41:24, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 406.40 to Tk. 417.80. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Date: 12-09-2022



It was observed in the above graph that on 12-09-2022, total number of trades of ORIONINFU in the market was 2711, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 465 which is approximately 17.15% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 555,535 whereas buy volume by the said client(s) was 218,477 which is approximately 39.33% of the total traded volume in the market. It is evident that the client had significant participation in the market on 12-09-2022 in trading of ORIONINFU share.

On 12-09-2022, trading of ORIONINFU share was started at Tk. 400.00 which is Tk. 7.60 less than the YCP of Tk. 407.60. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:28:45 at price Tk. 390.80 and induced the same to rise to Tk. 410.00 up to 13:32:35. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:28:45 to 13:32:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 99,490 shares of ORIONINFU compared to the total traded share of 104,491. This is shown in the following Pie Chart.

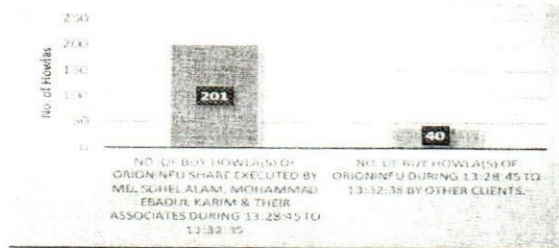
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Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 13:28:45 to 13:32:35

Total trade of ORIONINFU during 13:28:45 to 13:32:35 by other clients

It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 201 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 241 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 95.21% of the total trades of ORIONINFU shares by executing 201 of total 241 howlas from 13:28:45 to 13:32:35 on 12-09-2022. From 13:28:45 to 13:32:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 390.80 to Tk. 410.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:47:08 at price Tk. 390.00 and induced the same to rise to Tk. 404.00 up to 13:48:15. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:47:08 to 13:48:15, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 50,000 shares of ORIONINFU compared to the total traded share of 50,000. This is shown in the following Pie Chart.

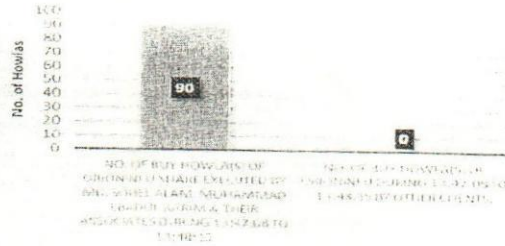


Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 13:47:08 to 13:48:15

Total trade of ORIONINFU during 13:47:08 to 13:48:15 by other clients

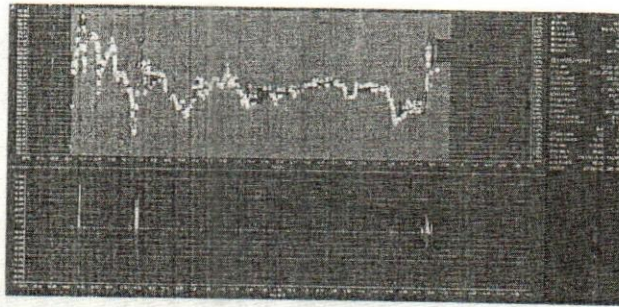
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 90 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 90 as shown in the following Bar Chart.

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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 100.00% of the total trades of ORIONINFU shares by executing 90 of total 90 howlas from 13:47:08 to 13:48:15 on 12-09-2022. From 13:47:08 to 13:48:15, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 390.00 to Tk. 404.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Date: 21-09-2022



It was observed in the above graph that on 21-09-2022, total number of trades of ORIONINFU in the market was 3376, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 530 which is approximately 15.70% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 664,877 whereas buy volume by the said client(s) was 315,955 which is approximately 47.52% of the total traded volume in the market. It is evident that the client had significant participation in the market on 21-09-2022 in trading of ORIONINFU share.

On 21-09-2022, trading of ORIONINFU share was started at Tk. 565.00 which is Tk. 18.10 less than the YCP of Tk. 583.10. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 9:37:40 at price Tk. 615.00 and induced the same to rise to Tk. 626.50 up to 9:38:35. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 9:37:40 to 9:38:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 100,000 shares of ORIONINFU compared to the total traded share of 108,783. This is shown in the following Pie Chart.

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■ Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 09:37:40 to 09:38:35

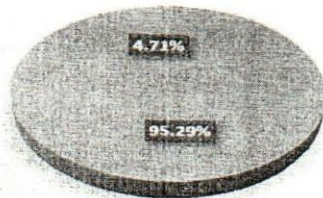
● Total trade of ORIONINFU during 09:37:40 to 09:38:35 by other clients

It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 98 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 137 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 91.93% of the total trades of ORIONINFU shares by executing 98 of total 137 howlas from 9:37:40 to 9:38:35 on 21-09-2022. From 9:37:40 to 9:38:35, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 615.00 to Tk. 626.50. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:17:33 at price Tk. 595.00 and induced the same to rise to Tk. 616.00 up to 10:19:17. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 10:17:33 to 10:19:17, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 215,639 shares of ORIONINFU compared to the total traded share of 145,489. This is shown in the following Pie Chart.

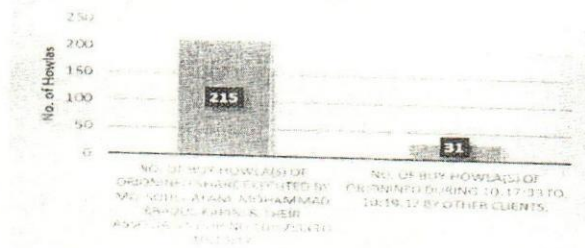


■ Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 10:17:33 to 10:19:17

● Total trade of ORIONINFU during 10:17:33 to 10:19:17 by other clients

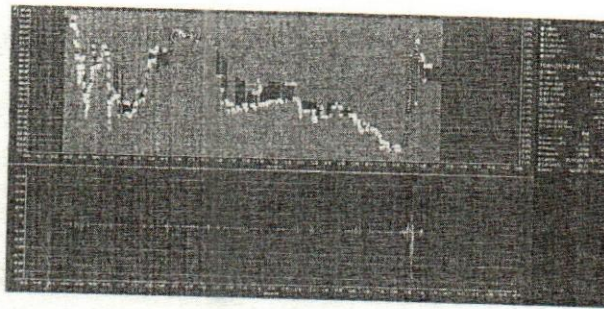
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 215 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 246 as shown in the following Bar Chart.

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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 95.29% of the total trades of ORIONINFU shares by executing 215 of total 246 howlas from 10:17:33 to 10:19:17 on 21-09-2022. From 10:17:33 to 10:19:17, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 595.00 to Tk. 616.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share. At the end of the day price of ORIONINFU share was increased by Tk. 20.40 which is approximately 3.50% higher than YCP.

Date: 25-09-2022



It was observed in the above graph that on 25-09-2022, total number of trades of ORIONINFU in the market was 2567, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 715 which is approximately 27.85% of the total number of trades in the market. Again, total traded volume of ORIONINFU in the market on that day was 393,576 whereas buy volume by the said client(s) was 114,706 which is approximately 29.14% of the total traded volume in the market.

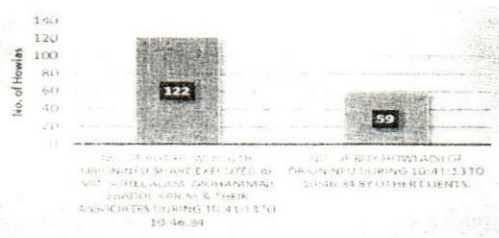
On 25-09-2022, trading of ORIONINFU share was started at Tk. 577.00 which is Tk. 1.40 more than the YCP of Tk. 575.60. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 10:41:13 at price Tk. 567.90 and induced the same to rise to Tk. 575.00 up to 10:46:34. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 10:41:13 to 10:46:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 15,042 shares of ORIONINFU compared to the total traded share of 18,560. This is shown in the following Pie Chart.

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Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 10:41:13 to 10:46:34
 Total trade of ORIONINFU during 10:41:13 to 10:46:34 by other clients.

It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 122 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 181 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 81.05% of the total trades of ORIONINFU shares by executing 122 of total 181 howlas from 10:41:13 to 10:46:34 on 25-09-2022. From 10:41:13 to 10:46:34, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 567.90 to Tk. 575.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Besides, on that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 13:33:23 at price Tk. 537.50 and induced the same to rise to Tk. 573.00 up to 13:42:39. It can also be observed from the above graph that Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed significant trades during this time period. It is mentionable here that from 13:33:23 to 13:42:39, Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 61,100 shares of ORIONINFU compared to the total traded share of 87,134. This is shown in the following Pie Chart.



Total trade of ORIONINFU share by Md. Sohel Alam, Mohammad Ebadul Karim & their associates during 13:33:23 to 13:42:39
 Total trade of ORIONINFU during 13:33:23 to 13:42:39 by other clients.

It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 176 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 237 as shown in the following Bar Chart.

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It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 70.12% of the total trades of ORIONINFU shares by executing 176 of total 237 howlas from 13:33:23 to 13:42:39 on 25-09-2022. From 13:33:23 to 13:42:39, Md. Sohel Alam, Mohammad Ebadul Karim and their associates induced the price to rise from Tk. 537.50 to Tk. 573.00. Thus it seems that Md. Sohel Alam, Mohammad Ebadul Karim and their associates were actively trying to lift the price of ORIONINFU share.

Summary of the trade by Md. Sohel Alam, Mohammad Ebadul Karim and their associates:

Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
317300	147.80	46896940.00	4577698	332.17	1520592361.40	10947158	236.30	2586852257.00	8903869	252.27	2246141781.80	190.61	1697133600.86	2043289	435.43	889718656.14

iv). Gain and Loss by Md. Sohel Alam, Mohammad Ebadul Karim and their associates from 21.06.2022 to 12.10.2022

Realized Capital gain(loss)per unit	61.66	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	32.35%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	549,008,180.94	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (44846)	919.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	484.17	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	111.19%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK ,	989,289,908.26	Quantity of Stock Positon x Unrealized gain (loss) per unit

As per DSE trade data, it was observed that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 10,947,158 shares and sold 8,903,869 shares of "ORIONINFU" from public market during the period from 21.06.2022 to 12.10.2022. With the said BO accounts, Mr. Md. Sohel Alam, Mohammad Ebadul Karim and their associates traded 80.35% shares of "ORIONINFU" during the investigation period and realized a capital gain of Tk. 549,008,180.94 from the trading of "ORIONINFU" share during the investigation period. They also had unrealized gain of TK. 989,289,908.26 during the period.

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Findings-1:

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 the 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 Mr. Md. Sohel Alam, Mohammad Ebadul Karim and their associates were involved directly and indirectly in a series of transactions of **ORIONINFU** share with his aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

Contravention(s)-1:

It appears that Md. Sohel Alam, Mohammad Ebadul Karim and their associates have violated the followings:

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

Observations- 2:

After analyzing the trade pattern of the clients, the investigation team found that Md. Sohel Alam (BOID# 1601880043377493), Mohammad Ebadul Karim (BOID#1203710046187231, 1601880046187231), Risana Karim (BOID# 1203710043493921, 1205590043493921, 1205590075153283), BEACON Medicare Ltd. (BOID# 1203710064190682, 1605170064190682), Beacon Pharmaceuticals Ltd-EPF (BOID# 1601880064821881, 1601880065365037), Nurunnahar Karim (BOID# 1203710075253110) were involved in trading of "ORIONINFU" shares by those accounts with misleading appearance of active trading on different date(s) from 21.06.2022 to 12.10.2022.

➤ Table: Counterparty trades:

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
04/07/2022	13:10:05	253520692	ORIONINFU	1000	88.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:10	253520746	ORIONINFU	700	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520897	ORIONINFU	1000	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520898	ORIONINFU	100	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public

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04/07/2022	13:10:21	253520899	ORIONINFU	900	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520900	ORIONINFU	200	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520901	ORIONINFU	800	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520902	ORIONINFU	300	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520903	ORIONINFU	700	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520904	ORIONINFU	400	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520905	ORIONINFU	600	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520906	ORIONINFU	500	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520907	ORIONINFU	500	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520908	ORIONINFU	600	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520909	ORIONINFU	400	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520910	ORIONINFU	700	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520911	ORIONINFU	300	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520912	ORIONINFU	800	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:21	253520913	ORIONINFU	100	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:10:27	253520968	ORIONINFU	1000	89	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	13:36:25	253540578	ORIONINFU	100	89	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	14:27:26	253589063	ORIONINFU	1647	89.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/07/2022	14:27:34	253589377	ORIONINFU	1000	89.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
05/07/2022	10:42:06	253639282	ORIONINFU	1000	92.8	DSEUBR	11755	1205590043493921	DSEABF	3371	1203710046187231	Public
07/07/2022	14:14:57	254072142	ORIONINFU	5000	95.7	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
14/07/2022	10:20:30	254396810	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396811	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396812	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396813	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396814	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396815	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396816	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396817	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396818	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396819	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396820	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396821	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396822	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396823	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396824	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396825	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396826	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396827	ORIONINFU	47	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
14/07/2022	10:20:30	254396828	ORIONINFU	4953	96	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
21/07/2022	10:06:51	255040895	ORIONINFU	150	107	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
21/07/2022	11:48:58	255103496	ORIONINFU	3193	106.1	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
24/07/2022	10:21:17	255201389	ORIONINFU	544	111.1	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
24/07/2022	10:22:18	255202212	ORIONINFU	4331	110.7	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
24/07/2022	10:51:00	255220908	ORIONINFU	525	112.4	DSEABF	5058	1203710064190682	DSEABF	3371	1203710046187231	Public
24/07/2022	10:51:00	255220909	ORIONINFU	153	112.4	DSEABF	5058	1203710064190682	DSEABF	3371	1203710046187231	Public
25/07/2022	10:44:29	255321024	ORIONINFU	1900	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:44:34	255321055	ORIONINFU	100	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:44:34	255321057	ORIONINFU	900	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:44:45	255321139	ORIONINFU	100	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255322870	ORIONINFU	981	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255322873	ORIONINFU	1000	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:11	255322874	ORIONINFU	904	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:18	255322945	ORIONINFU	96	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:18	255322946	ORIONINFU	904	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public

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25/07/2022	10:49:26	255323043	ORIONINFU	896	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:26	255323044	ORIONINFU	1000	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	10:49:43	255323159	ORIONINFU	904	106.2	DSEABF	3371	1203710046187231	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:23:44	255334170	ORIONINFU	347	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:25:24	255334841	ORIONINFU	377	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	11:40:39	255341730	ORIONINFU	1000	106.2	DSEABF	3214	1203710043493921	DSEMTB	22936	1601880064821881	Public
25/07/2022	14:29:30	255440853	ORIONINFU	495	108.4	DSEABF	3214	1203710043493921	DSEABF	3371	1203710046187231	Public
26/07/2022	13:13:07	255581303	ORIONINFU	1000	108.4	DSEABF	3371	1203710046187231	DSEABF	5058	1203710064190682	Public
26/07/2022	14:29:30	255635030	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635036	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635038	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635040	ORIONINFU	703	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635041	ORIONINFU	2797	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635043	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635045	ORIONINFU	2703	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635046	ORIONINFU	797	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635048	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635049	ORIONINFU	3500	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635050	ORIONINFU	1703	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:30	255635051	ORIONINFU	1297	109	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
26/07/2022	14:29:49	255635787	ORIONINFU	523	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635789	ORIONINFU	3962	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635790	ORIONINFU	10000	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635791	ORIONINFU	6038	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635792	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635793	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635794	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635795	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635796	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635797	ORIONINFU	525	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
26/07/2022	14:29:49	255635798	ORIONINFU	275	109.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
01/08/2022	14:25:18	256145462	ORIONINFU	9240	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145463	ORIONINFU	10000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145464	ORIONINFU	5760	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145465	ORIONINFU	4240	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145466	ORIONINFU	10000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145467	ORIONINFU	10000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145468	ORIONINFU	760	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145469	ORIONINFU	9240	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145470	ORIONINFU	10000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145471	ORIONINFU	5760	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:18	256145472	ORIONINFU	4240	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145588	ORIONINFU	20760	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145589	ORIONINFU	25000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145590	ORIONINFU	25000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145591	ORIONINFU	25000	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
01/08/2022	14:25:24	256145592	ORIONINFU	2440	118.8	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
02/08/2022	14:23:26	256751285	ORIONINFU	15000	117.4	DSEABF	5058	1203710064190682	DSEABF	3214	1203710043493921	Public
04/08/2022	14:13:30	256751601	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256751602	ORIONINFU	8300	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256751603	ORIONINFU	2700	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256751604	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256751605	ORIONINFU	6300	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256751606	ORIONINFU	4700	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
04/08/2022	14:13:30	256751607	ORIONINFU	11000	132.2	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public

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08/08/2022	10:04:21	256989005	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989006	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989007	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989008	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989009	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989010	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989011	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989012	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989013	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:04:21	256989014	ORIONINFU	10000	132.4	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
08/08/2022	10:16:14	257000652	ORIONINFU	675	131.8	DSEMTB	22985	1601880065365037	DSEABF	3371	1203710046187231	Public
08/08/2022	12:30:09	257088087	ORIONINFU	1090	131.9	DSEABF	3214	1203710043493921	DSEABF	5058	1203710064190682	Public
08/08/2022	12:30:25	257088188	ORIONINFU	383	131.8	DSEABF	3214	1203710043493921	DSEABF	5058	1203710064190682	Public
10/08/2022	11:50:02	257247206	ORIONINFU	581	134.4	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
10/08/2022	14:28:18	257332658	ORIONINFU	4140	132.6	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
14/08/2022	14:27:44	257575424	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:28:34	257576680	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:28:34	257576681	ORIONINFU	275	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578292	ORIONINFU	1725	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578294	ORIONINFU	625	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578295	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578296	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578297	ORIONINFU	625	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578298	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578299	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578300	ORIONINFU	625	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578301	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578302	ORIONINFU	2000	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578303	ORIONINFU	625	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
14/08/2022	14:29:26	257578304	ORIONINFU	1375	130.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
22/08/2022	12:32:54	258319843	ORIONINFU	654	173.8	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
24/08/2022	13:34:08	258866412	ORIONINFU	900	203.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:08	258866413	ORIONINFU	22	203.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:08	258866414	ORIONINFU	582	203.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:13	258866511	ORIONINFU	541	203.2	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:13	258866512	ORIONINFU	476	203.2	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:13	258866513	ORIONINFU	532	203.2	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:35	258866895	ORIONINFU	1011	203	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867390	ORIONINFU	145	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867391	ORIONINFU	12	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867392	ORIONINFU	355	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867393	ORIONINFU	1000	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:35:16	258867787	ORIONINFU	32	202.8	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:45:07	258881057	ORIONINFU	2000	199.7	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:45:21	258881478	ORIONINFU	1000	199.6	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:45:59	258882443	ORIONINFU	1000	199	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:46:19	258883024	ORIONINFU	2000	198.9	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:46:19	258883025	ORIONINFU	2000	198.9	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:46:19	258883026	ORIONINFU	1000	198.9	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
29/08/2022	13:30:35	259138873	ORIONINFU	8	237.7	DSEUBR	11755	1205590043493921	DSEABF	3371	1203710046187231	Public
29/08/2022	13:34:32	259743532	ORIONINFU	14500	211	DSEMTB	22985	1601880065365037	DSEABF	5058	1203710064190682	Block
29/08/2022	13:38:48	259749610	ORIONINFU	50000	211	DSEMTB	22936	1601880064821881	DSEABF	3214	1203710043493921	Block
30/08/2022	10:30:17	259850151	ORIONINFU	123	257.3	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:30:50	259850154	ORIONINFU	1000	257.7	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:30:54	259850157	ORIONINFU	67	257.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public

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30/08/2022	10:30:54	259850818	ORIONINFU	1033	257.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:31:22	259851280	ORIONINFU	900	258.1	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:29	259852363	ORIONINFU	66	258.7	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:29	259852364	ORIONINFU	1934	258.7	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:33	259852423	ORIONINFU	66	258.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:33	259852424	ORIONINFU	934	258.8	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:46	259852643	ORIONINFU	1000	259.2	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:55	259852807	ORIONINFU	66	259.3	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:55	259852808	ORIONINFU	1745	259.3	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:33:03	259852992	ORIONINFU	255	259.6	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:33:03	259852993	ORIONINFU	745	259.6	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	12:35:40	259965360	ORIONINFU	44500	223	DSEABF	5674	1203710075253110	DSEMTB	22936	1601880064821881	Block
31/08/2022	10:38:54	260159372	ORIONINFU	2000	288.7	DSEMTB	22985	1601880065365037	DSEABF	3214	1203710043493921	Public
01/09/2022	09:38:02	260399501	ORIONINFU	42000	313.8	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
04/09/2022	13:25:20	260953777	ORIONINFU	200	301.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/09/2022	13:25:41	260954110	ORIONINFU	200	303	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/09/2022	13:25:47	260954232	ORIONINFU	200	304	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/09/2022	13:26:00	260954505	ORIONINFU	200	307	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/09/2022	13:26:07	260954638	ORIONINFU	200	308.7	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
06/09/2022	13:04:21	261394140	ORIONINFU	61	354.7	DSEUBR	11755	1205590043493921	DSEABF	3371	1203710046187231	Public
07/09/2022	10:54:15	261558079	ORIONINFU	995	358.5	DSECBL	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	10:54:15	261558080	ORIONINFU	5	358.5	DSECBL	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	10:54:45	261558573	ORIONINFU	1000	359.9	DSECBL	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	10:57:38	261561928	ORIONINFU	625	374.9	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	10:57:38	261561929	ORIONINFU	375	374.9	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	10:58:21	261562640	ORIONINFU	100	378.9	DSECBL	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	10:58:31	261562780	ORIONINFU	430	378.9	DSECBL	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	10:58:40	261562961	ORIONINFU	370	378.9	DSECBL	CM489	1605170064190682	DSEABF	3214	1203710043493921	Public
07/09/2022	12:18:26	261633698	ORIONINFU	221	384.3	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	12:18:26	261633699	ORIONINFU	1000	384.3	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	13:13:13	261675217	ORIONINFU	279	384.5	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
07/09/2022	13:35:38	261703566	ORIONINFU	2279	385.4	DSEMTB	10310	1601880046187231	DSEABF	3214	1203710043493921	Public
11/09/2022	12:35:26	262145596	ORIONINFU	500	429.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
11/09/2022	12:35:46	262145887	ORIONINFU	500	432.6	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
11/09/2022	12:36:12	262146278	ORIONINFU	500	434.4	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
11/09/2022	12:37:09	262147015	ORIONINFU	500	433.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:41:34	262642118	ORIONINFU	63	400.3	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:41:34	262642119	ORIONINFU	937	400.3	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:45:34	262648774	ORIONINFU	9000	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:45:34	262648776	ORIONINFU	9000	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:45:40	262648931	ORIONINFU	2649	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:46:09	262649775	ORIONINFU	8375	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
13/09/2022	13:46:09	262649777	ORIONINFU	625	407.9	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710064190682	Public
15/09/2022	09:33:15	262885099	ORIONINFU	1000	467.4	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
15/09/2022	09:33:20	262885153	ORIONINFU	2000	467.4	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
15/09/2022	09:33:39	262885490	ORIONINFU	900	467.4	DSEUBR	11788	1205590075153283	DSEABF	3371	1203710046187231	Public
15/09/2022	12:33:03	263014249	ORIONINFU	3100	467.4	DSEMTB	23176	1601880043377493	DSEUBR	11788	1205590075153283	Block
19/09/2022	09:32:05	263375227	ORIONINFU	527	546	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
19/09/2022	09:32:21	263375554	ORIONINFU	861	546.2	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
19/09/2022	09:32:30	263375800	ORIONINFU	1000	546.3	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
21/09/2022	10:17:33	264032257	ORIONINFU	1000	595	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
21/09/2022	10:19:12	264034019	ORIONINFU	240	615	DSEMTB	10310	1601880046187231	DSEABF	3371	1203710046187231	Public
22/09/2022	13:51:02	264462870	ORIONINFU	2650	575.6	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
22/09/2022	13:51:02	264462872	ORIONINFU	5000	575.6	DSEABF	3371	1203710046187231	DSEMTB	23176	1601880043377493	Public
25/09/2022	11:06:00	264580789	ORIONINFU	165	574.5	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public

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25/09/2022	11:07:35	264582014	ORIONINFU	465	574.6	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
25/09/2022	11:07:40	264582094	ORIONINFU	135	574.5	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
25/09/2022	13:41:10	264709537	ORIONINFU	1000	568.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
27/09/2022	13:41:01	265138996	ORIONINFU	2500	573.6	DSEMTB	10310	1601880046187231	DSEABF	3214	1203710043493921	Public
28/09/2022	13:38:26	265346913	ORIONINFU	1852	570	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
28/09/2022	13:38:26	265346914	ORIONINFU	1148	570	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
10/10/2022	09:43:34	266393189	ORIONINFU	12	797	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public
10/10/2022	09:43:35	266393211	ORIONINFU	97	797	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710043493921	Public

(DSE trade data)

Findings-2:

As per section 17 of the Securities and Exchange Ordinance, 1969 (XVII of 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-

(ii) create a false and misleading appearance of active trading in any security.

It is observed that Mr. Md. Sohel Alam, Mohammad Ebadul Karim, Risana Karim, BEACON Medicare Ltd. Beacon Pharmaceuticals Ltd-EPF and Nurunnahar Karim traded 1,074,818 shares of ORIONINFU among each other during the investigation period.

Contravention(s)-2:

It appears that Md. Sohel Alam (BOID# 1601880043377493), Mohammad Ebadul Karim (BOID # 1203710046187231, 1601880046187231), Risana Karim (BOID# 1203710043493921, 1205590043493921, 1205590075153283), BEACON Medicare Ltd. (BOID# 1203710064190682, 1605170064190682), Beacon Pharmaceuticals Ltd-EPF (BOID# 1601880064821881, 1601880065365037), Nurunnahar Karim (BOID# 1203710075253110) have violated the following:

- Section 17 (e) (ii) of the Securities and Exchange Ordinance, 1969 by executing trade of "ORIONINFU" share by creating false and misleading appearance while trading in that security.

Observations- 3:

After analyzing the trade pattern of the clients, the investigation team found that Ms. RISANA KARIM (BOID# 1205590043493921 and 1203710043493921), daughter of Mohammad Ebadul Karim was involved in trading of "ORIONINFU" shares by those two (02)

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accounts which resulted no change in beneficial ownership on different dates from 21.06.2022 to 12.10.2022. Details of all the above mentioned trades are as follows:

➤ Trade within same client (BOID# 1205590043493921 and 1203710043493921):

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
03/08/2022	11:52:52	256469951	ORIONINFU	1000	119.7	DSEUBR	11755	1205590043493921	DSEABF	3214	1203710043493921	Public
03/08/2022	11:53:06	256470107	ORIONINFU	834	119.9	DSEUBR	11755	1205590043493921	DSEABF	3214	1203710043493921	Public
07/08/2022	12:32:07	256893567	ORIONINFU	3564	129.5	DSEUBR	11755	1205590043493921	DSEABF	3214	1203710043493921	Public
17/08/2022	14:07:12	257940574	ORIONINFU	1000	145	DSEUBR	11755	1205590043493921	DSEABF	3214	1203710043493921	Public
22/08/2022	10:32:57	258217927	ORIONINFU	1000	165.9	DSEUBR	11755	1205590043493921	DSEABF	3214	1203710043493921	Public
22/08/2022	10:34:06	258219231	ORIONINFU	900	167.4	DSEUBR	11755	1205590043493921	DSEABF	3214	1203710043493921	Public
06/09/2022	11:03:08	261308687	ORIONINFU	4	329.3	DSEUBR	11755	1205590043493921	DSEABF	3214	1203710043493921	Public

(DSE trade data)

Findings-3:

As per section 17 of the Securities and Exchange Ordinance, 1969 (XVII of 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-

(iii) effect any transaction in such security which involves no change in its beneficial ownership;

It is observed that Ms. RISANA KARIM (BOID# 1205590043493921 and 1203710043493921) traded 8,302 shares of ORIONINFU within same client which resulted no change in beneficial ownership during the investigation period.

Contravention(s)-3:

It appears that Ms. RISANA KARIM (BOID# 1205590043493921 and 1203710043493921) has violated the following:

➤ Section 17 (e) (iii) of the Securities and Exchange Ordinance, 1969 by executing trade of "ORIONINFU" share in such a manner where there was no change in beneficial ownership.

Observation - 4:

As per transaction ledger, instrument ledger, portfolio statement and DSE trade data of **Md. Sohel Alam, Mohammad Ebadul Karim & their Associates**, collected from the respective Depository Participants, it was observed that they had collectively acquired more than 10% shares of "ORIONINFU" as on different date(s) during the investigation period. Details are given below:

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Sl. No	Client Name	Client Code	Name of TREC Holder	07-08-22		08-08-22		10-08-22		11-08-22		14-08-22		16-08-22		17-08-22		21-08-22	
				Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	MD SOHEL ALAM	23176	MTB Securities Limited	85962.00	4.22%	85962.00	4.71%	1017339.00	5.00%	937339.00	4.60%	1024908.00	5.03%	1024908.00	5.03%	1025738.00	5.04%	1029090.00	5.05%
2	MOHAMMAD EBADUL KARM	3371	AB Securities Limited	658261.00	3.23%	543263.00	2.67%	646261.00	3.17%	648946.00	3.19%	661046.00	3.25%	601046.00	2.95%	641631.00	3.15%	572631.00	2.81%
3	MOHAMMAD EBADUL KARM	10310	MTB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
4	RSANA KARM	3214	AB Securities Limited	66784.00	0.33%	184274.00	0.90%	142140.00	0.70%	195061.00	0.96%	195061.00	0.96%	195061.00	0.96%	160061.00	0.79%	166361.00	0.82%
5	RSANA KARM	11755	UCB Stock Brokerage Limited	40000.00	0.20%	40000.00	0.20%	40000.00	0.20%	20000.00	0.10%	40000.00	0.20%	40000.00	0.20%	39000.00	0.19%		0.00%
6	RSANA KARM	11788	UCB Stock Brokerage Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
7	BEACON MEDICARE LTD	5058	AB Securities Limited	425817.00	2.09%	180101.00	0.88%	272457.00	1.34%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%
8	BEACON MEDICARE LTD	CM489	City Bank Capital Resources Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
9	BEACON PHARMACEUTICALS LTD-EFF	22936	MTB Securities Limited	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%
10	BEACON PHARMACEUTICALS LTD-EFF	22985	MTB Securities Limited	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%
11	Beacon Pharmaceuticals Ltd	7053	AB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
12	NURUNNAHAR KARM	5674	AB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
Total				2228735.00	10.95%	2087577.00	10.25%	2298336.00	11.29%	2431351.00	11.94%	2551020.00	12.53%	2491020.00	12.24%	2496435.00	12.26%	2398087.00	11.78%
Total No. of Outstanding Securities				20359760															

Sl. No	Client Name	Client Code	Name of TREC Holder	22-08-22		23-08-22		24-08-22		25-08-22		28-08-22		29-08-22		31-08-22		01-09-22	
				Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	MD SOHEL ALAM	23176	MTB Securities Limited	1039090.00	5.10%	1019090.00	5.10%	1099000.00	5.40%	1099000.00	5.40%	1244150.00	6.11%	947207.00	4.65%	1188116.00	5.84%	935116.00	4.59%
2	MOHAMMAD EBADUL KARM	3371	AB Securities Limited	596811.00	2.93%	565681.00	2.78%	471945.00	2.32%	480158.00	2.36%	612627.00	3.01%	541621.00	2.66%	285943.00	1.40%	473686.00	2.33%
3	MOHAMMAD EBADUL KARM	10310	MTB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
4	RSANA KARM	3214	AB Securities Limited	113861.00	0.56%	115861.00	0.57%	177861.00	0.87%	92861.00	0.46%	168488.00	0.83%	118488.00	0.58%	143573.00	0.71%		0.00%
5	RSANA KARM	11755	UCB Stock Brokerage Limited	39000.00	0.19%		0.00%	40000.00	0.20%	40500.00	0.20%	60000.00	0.29%	42753.00	0.21%	42753.00	0.21%	44153.00	0.22%
6	RSANA KARM	11788	UCB Stock Brokerage Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	83652.00	0.41%
7	BEACON MEDICARE LTD	5058	AB Securities Limited	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	449868.00	2.21%	424368.00	2.08%	391968.00	1.93%	436968.00	2.15%	436968.00	2.15%
8	BEACON MEDICARE LTD	CM489	City Bank Capital Resources Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%
9	BEACON PHARMACEUTICALS LTD-EFF	22936	MTB Securities Limited	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	133000.00	0.65%	78200.00	0.38%	128200.00	0.63%	115700.00	0.57%		0.00%
10	BEACON PHARMACEUTICALS LTD-EFF	22985	MTB Securities Limited	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	47137.00	0.23%	32137.00	0.16%	46637.00	0.23%	42137.00	0.21%	42137.00	0.21%
11	Beacon Pharmaceuticals Ltd	7053	AB Securities Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	24148.00	0.12%
12	NURUNNAHAR KARM	5674	AB Securities Limited	0.00	0.00%	4660.00	0.02%	4660.00	0.02%	4660.00	0.02%	4660.00	0.02%	4660.00	0.02%	49160.00	0.24%	49160.00	0.24%
Total				2418637.00	11.88%	2355297.00	11.57%	2423171.00	11.90%	2347184.00	11.53%	2624630.00	12.89%	2221534.00	10.91%	2304350.00	11.32%	2089020.00	10.26%
Total No. of Outstanding Securities				20359760															

Sl. No	Client Name	Client Code	Name of TREC Holder	04-09-22		05-09-22		06-09-22		07-09-22		11-09-22		12-09-22		13-09-22		21-09-22	
				Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	MD SOHEL ALAM	23176	MTB Securities Limited	1233358.00	6.06%	1277498.00	6.25%	1073498.00	5.27%	1213498.00	5.96%	1242270.00	6.10%	1142270.00	5.61%	1253887.00	6.16%	1041499.00	5.12%
2	MOHAMMAD EBADUL KARM	3371	AB Securities Limited	195968.00	0.96%	189968.00	0.94%	181968.00	0.90%	185968.00	0.91%	195207.00	0.96%	195207.00	0.96%	193397.00	0.95%	156986.00	0.77%
3	MOHAMMAD EBADUL KARM	10310	MTB Securities Limited	0.00	0.00%	0.00	0.00%	38700.00	0.18%	118703.00	0.58%	78555.00	0.38%	160104.00	0.79%	160104.00	0.79%	133843.00	0.66%
4	RISANA KARM	3214	AB Securities Limited	152773.00	0.75%	157573.00	0.77%	137773.00	0.68%	102758.00	0.50%	147990.00	0.73%	147990.00	0.73%	47990.00	0.24%	105888.00	0.52%
5	RISANA KARM	11755	UCB Stock Brokerage Limited	44153.00	0.22%	43753.00	0.21%	41768.00	0.20%	41768.00	0.20%	41268.00	0.20%	41268.00	0.20%	41268.00	0.20%	30474.00	0.15%
6	RISANA KARM	11788	UCB Stock Brokerage Limited	83652.00	0.41%	84152.00	0.41%	84152.00	0.41%	84152.00	0.41%	84152.00	0.41%	84152.00	0.41%	84152.00	0.41%	58949.00	0.29%
7	BEACON MEDICARE LTD	5058	AB Securities Limited	296968.00	1.46%	296968.00	1.46%	296968.00	1.46%	296968.00	1.46%	165868.00	0.81%	282596.00	1.39%	253471.00	1.24%	268471.00	1.32%
8	BEACON MEDICARE LTD	CM489	City Bank Capital Resources Limited	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%
9	BEACON PHARMACEUTICALS LTD-EFF	22936	MTB Securities Limited	115700.00	0.57%	115700.00	0.57%	115700.00	0.57%	700.00	0.00%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%
10	BEACON PHARMACEUTICALS LTD-EFF	22985	MTB Securities Limited	42137.00	0.21%	42137.00	0.21%	42137.00	0.21%	42137.00	0.21%	2137.00	0.01%	22137.00	0.11%	40144.00	0.20%	40144.00	0.20%
11	Beacon Pharmaceuticals Ltd	7053	AB Securities Limited	103141.00	0.51%	103141.00	0.51%	103141.00	0.51%	103141.00	0.51%	103141.00	0.51%	103141.00	0.51%	105141.00	0.52%	105141.00	0.52%
12	NURUNNAHAR KARM	5674	AB Securities Limited	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%
Total				2317050.00	11.38%	2356050.00	11.57%	2226453.00	10.94%	2238453.00	10.99%	2319998.00	11.40%	1438475.00	11.98%	2438974.00	11.98%	2201005.00	10.81%
Total No. of Outstanding Securities				20359760															

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Sl. No	Client Name	Client Code	Name of TREC Holder	22-09-22		25-09-22		28-09-22		17-09-22		28-09-22		29-09-22		02-10-22		03-10-22		04-10-22		12-10-22	
				Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent	Total Qty	Percent
1	MD. SOHEL ALAM	23176	MTB Securities Limited	981749.00	4.82%	1039222.00	5.16%	1039222.00	5.10%	992222.00	4.87%	1036276.00	5.09%	1017270.00	5.00%	1017270.00	5.00%	1017270.00	5.00%	987270.00	4.75%	977704.00	4.80%
2	MUHAMMAD EBADUL KARIM	3371	AB Securities Limited	178415.00	0.87%	136465.00	0.67%	158565.00	0.77%	191221.00	0.94%	188221.00	0.92%	165998.00	0.82%	173998.00	0.85%	167418.00	0.82%	175758.00	0.86%	164392.00	0.81%
3	MUHAMMAD EBADUL KARIM	10310	MTB Securities Limited	133843.00	0.64%	133843.00	0.64%	133843.00	0.64%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%
4	RISANA KARIM	3214	AB Securities Limited	46781.00	0.23%	9354.00	0.04%	11304.00	0.05%	7042.00	0.03%	99572.00	0.49%	108580.00	0.49%	17880.00	0.09%	102163.00	0.50%	93822.00	0.46%	94013.00	0.46%
5	RISANA KARIM	11755	UCB Stock Brokerage Limited	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%	30474.00	0.15%
6	RISANA KARIM	11788	UCB Stock Brokerage Limited	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%	58949.00	0.29%
7	BEACON MEDICARE LTD	5058	AB Securities Limited	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%	278471.00	1.37%
8	BEACON MEDICARE LTD	0M483	City Bank Capital Resources Limited	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%	112750.00	0.55%
9	BEACON PHARMACEUTICALS LTD-EFF	22936	MTB Securities Limited	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%	97700.00	0.48%
10	BEACON PHARMACEUTICALS LTD-EGF	22985	MTB Securities Limited	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%	40144.00	0.20%
11	Beacon Pharmaceuticals Ltd	1053	AB Securities Limited	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%	105141.00	0.52%
12	MURUNAHAR KARIM	5674	AB Securities Limited	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%	49160.00	0.24%
Total				1101577.00	10.32%	1175833.00	10.65%	1214463.00	10.88%	1169001.00	10.65%	1233195.00	10.97%	1210357.00	10.33%	1218380.00	10.50%	1235993.00	10.79%	1245993.00	10.54%	1203689.00	10.00%
Total No. of Outstanding Securities				20359760	10.32%		10.65%		10.88%		10.65%		10.97%		10.33%		10.50%		10.79%		10.54%		10.00%

From the above table, it is observed that **Md. Sohel Alam, Mohammad Ebadul Karim & their associates** jointly hold more than 10% shares of the total paid up shares of "ORIONINFU" which violates বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ since there was no declaration to buy more than 10% shares of the above instruments.

Findings - 4:

As per উপ-বিধি (১) (ক) of বিধি ২ 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....."

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।"

It is found that **Md. Sohel Alam, Mohammad Ebadul Karim & their Associates** jointly hold more than 10% shares of 'ORIONINFU' on the aforesaid dates during the investigation period. Through the aforesaid activities, it appears that **Md. Sohel Alam, Mohammad Ebadul Karim & their associates** violated বিধি ৪(১) of বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উল্লেখযোগ্য সংখ্যক শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮.

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Market, Market Intermediaries and Other Affairs Section
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Contravention - 4:

It appears that Md. Sohel Alam, Mohammad Ebadul Karim & their associates 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 "ORIONINFU" without declaration.

INDIVIDUAL TRADE PATTERN OF RISANA KARIM:

i. Individual Trade Patterns of Risana Karim (Only Public Market):

Date	Code # 3214				Code # 11755				Code # 11788				Total					
	BO ID # 1203710043493921				BO ID # 1205590043493921				BO ID # 1205590075153283									
	RISANA KARIM				RISANA KARIM				RISANA KARIM									
	AB Securities Limited		UCB Stock Brokerage Limited		UCB Stock Brokerage Limited		UCB Stock Brokerage Limited		UCB Stock Brokerage Limited		UCB Stock Brokerage Limited							
Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total	
05-07-2022	0	0.00	0	0.00	40000	92.78	0	0.00	0	0.00	0	0.00	40000	92.78	3711397.90	0	0.00	0.00
06-07-2022	91273	94.86	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	91273	94.86	8657997.00	0	0.00	0.00
07-07-2022	18360	96.72	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	18360	96.72	1775818.00	0	0.00	0.00
14-07-2022	4100	95.59	9000	96.30	0	0.00	0	0.00	0	0.00	0	0.00	4100	95.59	391920.00	9000	96.30	866700.00
17-07-2022	0	0.00	28000	97.46	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	28000	97.46	2728960.00
18-07-2022	18000	99.51	30000	100.76	0	0.00	0	0.00	0	0.00	0	0.00	18000	99.51	1791226.40	30000	100.76	3022860.50
19-07-2022	19000	98.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	19000	98.24	1866500.00	0	0.00	0.00
20-07-2022	1110	98.61	21000	101.57	22000	106.13	22000	105.61	0	0.00	0	0.00	23110	105.77	2444384.90	43000	103.64	4456400.00
21-07-2022	3000	105.88	13000	107.15	0	0.00	0	0.00	0	0.00	0	0.00	3000	105.88	317632.00	13000	107.15	1393000.00
24-07-2022	50000	107.22	41000	109.36	20000	108.10	20000	109.90	0	0.00	0	0.00	70000	107.47	7522753.00	61000	109.54	6681884.00
25-07-2022	33875	106.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	33875	106.90	3621282.00	0	0.00	0.00
26-07-2022	0	0.00	38002	109.47	39000	108.51	39000	109.06	0	0.00	0	0.00	39000	108.51	4231774.60	77002	109.26	8413345.70
27-07-2022	10000	107.31	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	10000	107.31	1073050.00	0	0.00	0.00
28-07-2022	0	0.00	0	0.00	10004	104.70	10004	104.70	0	0.00	0	0.00	10004	104.70	1047418.80	10004	104.70	1047418.80
31-07-2022	2600	107.30	20600	113.89	29996	116.26	29996	111.99	0	0.00	0	0.00	32596	115.54	3766293.20	50596	112.76	5705312.00
01-08-2022	18000	116.66	12000	118.23	0	0.00	0	0.00	0	0.00	0	0.00	18000	116.66	2099872.50	12000	118.23	1418700.00
02-08-2022	25441	116.32	26091	117.60	0	0.00	0	0.00	0	0.00	0	0.00	25441	116.32	2959330.40	26091	117.60	3068252.50
03-08-2022	2000	118.25	25000	119.97	40000	119.93	40000	124.35	0	0.00	0	0.00	42000	119.85	5033642.30	65000	122.66	7973200.40
04-08-2022	60069	127.95	36865	128.70	0	0.00	0	0.00	0	0.00	0	0.00	60069	127.95	7685706.50	36865	128.70	4744612.00
07-08-2022	0	0.00	21986	130.25	38000	129.38	38000	130.28	0	0.00	0	0.00	38000	129.38	4916297.60	59986	130.27	7814465.60
08-08-2022	117440	133.22	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	117440	133.22	15645293.90	0	0.00	0.00
10-08-2022	0	0.00	42084	133.98	20000	133.77	20000	134.03	0	0.00	0	0.00	20000	133.77	2675339.20	62084	134.00	8318986.30
11-08-2022	52921	131.55	0	0.00	0	0.00	20000	130.40	0	0.00	0	0.00	52921	131.55	6961805.00	20000	130.40	2607964.60
14-08-2022	0	0.00	0	0.00	40000	127.51	20000	130.30	0	0.00	0	0.00	40000	127.51	5100405.80	20000	130.30	2606000.00
17-08-2022	0	0.00	35000	143.21	39000	145.76	40000	142.26	0	0.00	0	0.00	39000	145.76	5684763.10	75000	142.70	10702709.60
21-08-2022	6300	149.35	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	6300	149.35	940930.00	0	0.00	0.00
22-08-2022	0	0.00	36000	168.45	39000	166.15	38000	172.54	0	0.00	0	0.00	39000	166.15	6479715.00	74000	170.55	12620767.50
23-08-2022	2000	185.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	2000	185.50	371000.00	0	0.00	0.00
24-08-2022	62000	194.87	0	0.00	36000	191.64	35000	198.95	0	0.00	0	0.00	98000	193.68	18980977.40	35000	198.95	6963306.60
25-08-2022	0	0.00	85000	209.96	0	0.00	500	220.00	0	0.00	0	0.00	0	0.00	0.00	85000	210.02	17956893.60
28-08-2022	75617	236.50	0	0.00	19500	235.25	0	0.00	0	0.00	0	0.00	95127	236.24	22473146.30	0	0.00	0.00
29-08-2022	0	0.00	0	0.00	753	236.94	18000	244.40	0	0.00	0	0.00	753	236.94	178414.50	18000	244.40	4399200.00
30-08-2022	36085	261.12	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	36085	261.12	9422563.30	0	0.00	0.00
31-08-2022	0	0.00	11000	287.72	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	11000	287.72	3164950.00
01-09-2022	9200	307.47	0	0.00	44153	301.02	42753	313.80	83652	295.73	0	0.00	137005	298.22	40858083.00	42753	313.80	13415891.40
05-09-2022	4800	328.20	0	0.00	13000	317.25	13400	308.77	500	319.10	0	0.00	18300	320.17	5859102.40	13400	308.77	4137490.00
06-09-2022	185	332.10	20000	341.77	27000	336.38	6485	354.88	0	0.00	0	0.00	27185	336.35	9143586.00	26485	344.98	9136854.30
07-09-2022	0	0.00	16800	372.69	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	16800	372.69	6261125.80
08-09-2022	1000	418.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1000	418.90	418900.00	0	0.00	0.00

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11-09-2022	45232	412.88	1000	421.40	0	0.00	0	0.00	0	0.00	0	0.00	45232	412.88	18675414.80	1000	421.40	421400.00
14-09-2022	0	0.00	0	0.00	17000	428.82	310	429.80	0	0.00	0	0.00	17000	428.82	7289882.50	310	429.80	133238.00
15-09-2022	0	0.00	0	0.00	0	0.00	0	0.00	40000	467.40	0	0.00	40000	467.40	18696000.00	0	0.00	0.00
18-09-2022	5000	499.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5000	499.60	2497987.20	0	0.00	0.00
19-09-2022	0	0.00	5000	545.92	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	5000	545.92	2729600.00
20-09-2022	11457	569.10	0	0.00	29500	587.20	0	0.00	58000	587.16	0	0.00	98957	585.08	57897939.90	0	0.00	0.00
21-09-2022	46441	615.65	0	0.00	515	616.32	0	0.00	360	516.00	0	0.00	47316	615.66	29130465.10	0	0.00	0.00
22-09-2022	0	0.00	59107	609.59	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	59107	609.59	36031014.00
25-09-2022	46733	567.61	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	46733	567.61	26526321.40	0	0.00	0.00
26-09-2022	18530	568.69	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	18530	568.69	10537879.20	0	0.00	0.00
27-09-2022	0	0.00	35618	573.50	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	35618	573.50	20426982.50
28-09-2022	23146	561.44	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	23146	561.44	12995097.40	0	0.00	0.00
29-09-2022	1008	566.09	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1008	566.09	570620.00	0	0.00	0.00
02-10-2022	0	0.00	9000	617.16	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	9000	617.16	5554450.00
03-10-2022	64183	649.43	0	0.00	5	630.70	0	0.00	5	637.84	0	0.00	64193	649.42	41688420.00	0	0.00	0.00
04-10-2022	0	0.00	8341	699.04	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	8341	699.04	5830677.40
06-10-2022	90	740.20	0	0.00	0	0.00	0	0.00	0	0.00	5000	754.00	90	740.20	66618.00	5000	754.00	3770000.00
10-10-2022	0	0.00	5999	796.76	0	0.00	0	0.00	13552	790.75	0	0.00	13552	790.75	10716189.20	5999	796.76	4779742.90
11-10-2022	2000	820.00	0	0.00	0	0.00	0	0.00	85	859.60	0	0.00	2085	821.61	1713066.00	0	0.00	0.00
12-10-2022	4100	911.41	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	4100	911.41	3736765.20	0	0.00	0.00
Total	992306		692493		564426		453448		196154		5000		1752886			1150941		

ii. Effects of 'ORIONINFU' at DSE by Risana Karim (Public and Block Market):

Date	Buy			Sale			Cost of shares sold		Stock Position			Comparison with the Market						
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Bonus Share Credited	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 (%)
Opening Balance										0	0.00	0.00						
05-07-2022	40000	92.78	3711397.90	0	0.00	0.00	0	0.00	0.00	40000	92.78	3711397.90	779820	93.40	4.01%	5.13%	0.00%	5.13%
06-07-2022	91273	94.86	8657997.00	0	0.00	0.00	0	0.00	0.00	131273	94.23	12369394.90	1725375	95.00	1.71%	5.29%	0.00%	5.29%
07-07-2022	18360	96.72	1775818.00	0	0.00	0.00	0	0.00	0.00	149633	94.53	14145212.90	1282519	96.60	1.68%	1.43%	0.00%	1.43%
14-07-2022	4100	95.59	391920.00	9000	96.30	866700.00	0	94.56	851048.22	144733	94.56	13686084.68	519240	95.70	0.21%	0.79%	1.73%	2.52%
17-07-2022	0	0.00	0.00	28000	97.46	2728960.00	0	94.56	2647705.58	116733	94.56	11038379.10	767784	98.10	2.51%	0.00%	3.65%	3.65%
18-07-2022	18000	99.51	1791226.40	30000	100.76	3022860.50	0	95.22	2856673.31	104733	95.22	9972932.19	1383331	100.20	2.14%	1.30%	2.17%	3.47%
19-07-2022	19000	98.24	1866500.00	0	0.00	0.00	0	0.00	0.00	123733	95.69	11839432.19	611949	98.40	-1.80%	3.05%	0.00%	3.05%
20-07-2022	23110	105.77	2444384.90	43000	103.64	4456400.00	0	97.27	4182726.69	103843	97.27	10101090.41	1634961	105.50	7.22%	1.41%	2.63%	4.04%
21-07-2022	3000	105.88	317632.00	13000	107.15	1393000.00	0	97.51	1267686.15	93843	97.51	9151036.26	1201045	107.10	1.52%	0.25%	1.08%	1.33%
24-07-2022	70000	107.47	7522753.00	61000	109.54	6681884.00	0	101.77	6207779.06	102843	101.77	10466010.20	2162191	108.30	1.12%	3.24%	2.82%	6.06%
25-07-2022	33875	106.90	3621282.00	0	0.00	0.00	0	0.00	0.00	136718	103.04	14087292.20	1057758	107.80	-0.46%	3.20%	0.00%	3.20%
26-07-2022	39000	108.51	4231774.60	77002	109.26	8413345.70	0	104.25	8027662.40	98716	104.25	10291404.40	1045216	108.90	1.02%	3.73%	7.37%	11.10%
27-07-2022	42500	107.84	4583050.00	0	0.00	0.00	0	0.00	0.00	141216	105.33	14874454.40	803203	106.80	-1.93%	5.29%	0.00%	5.29%
28-07-2022	10004	104.70	1047418.80	10004	104.70	1047418.80	0	105.29	1053315.83	141216	105.29	14868557.37	336194	104.70	-1.97%	2.98%	2.98%	5.95%
31-07-2022	32596	115.54	3766293.20	50596	112.76	5705312.00	0	107.21	5424532.83	123216	107.21	13210317.74	1645491	116.30	11.08%	1.98%	3.07%	5.06%
01-08-2022	18000	116.66	2099872.50	12000	118.23	1418700.00	0	108.42	1301001.89	129216	108.42	14009188.35	1612628	117.70	1.20%	1.12%	0.74%	1.86%
02-08-2022	25441	116.32	2959330.40	26091	117.60	3068252.50	0	109.72	2862629.06	128566	109.72	14105889.69	1317898	117.10	-0.51%	1.93%	1.98%	3.91%
03-08-2022	42000	119.85	5033642.30	65000	122.66	7973200.40	0	112.21	7293772.38	105566	112.21	11845759.61	1621332	125.50	7.17%	2.59%	4.01%	6.60%
04-08-2022	60969	127.95	7685706.50	36865	128.70	4744612.00	0	117.92	4347073.37	128770	117.92	15184392.74	1354912	132.30	5.42%	4.43%	2.72%	7.15%
07-08-2022	38000	129.38	4916297.60	59986	130.27	7814465.60	0	120.53	7230077.42	106784	120.53	12870612.92	1254586	131.40	-0.68%	3.03%	4.78%	7.81%
08-08-2022	117440	133.22	15645293.90	0	0.00	0.00	0	0.00	0.00	224224	127.18	28515906.82	1291450	133.90	1.90%	9.09%	0.00%	9.09%
10-08-2022	20000	133.77	2675339.20	62084	134.00	8318986.30	0	127.72	7929103.27	182140	127.72	23262142.75	862063	133.70	-0.15%	2.32%	7.20%	9.52%
11-08-2022	52921	131.55	6961805.00	20000	130.40	2606000.00	0	128.58	2571583.35	215061	128.58	27652364.39	1353321	130.50	-2.39%	3.91%	1.48%	5.39%
14-08-2022	40000	127.51	5100405.50	20000	130.30	2606000.00	0	128.41	2568230.36	235061	128.41	30184539.83	557873	129.10	-1.07%	7.17%	3.59%	10.76%
17-08-2022	39000	145.76	5684763.10	75000	142.70	10702709.60	0	130.88	9816054.53	199061	130.88	26053248.41	762354	145.80	3.18%	5.12%	9.84%	14.95%
21-08-2022	6300	149.35	940930.00	0	0.00	0.00	0	0.00	0.00	205361	131.45	26994178.41	1370333	158.10	8.44%	0.46%	0.00%	0.46%
22-08-2022	39000	166.15	6479715.00	90500	168.99	15293767.50	0	136.99	12397180.21	153861	136.99	21076713.20	1367866	173.90	9.99%	2.85%	6.62%	9.47%
23-08-2022	2000	185.50	371000.00	0	0.00	0.00	0	0.00	0.00	137.64	137.64	21447713.20	1076925	191.20	9.95%	0.19%	0.00%	0.19%
24-08-2022	98000	193.68	18980977.40	35000	198.95	6963306.60	0	159.26	5573932.86	218861	159.26	34854757.73	1683329	200.00	4.60%	5.82%	2.08%	7.90%
25-08-2022	0	0.00	0.00	85500	210.02	17956893.60	0	159.26	13616321.71	133361	159.26	21238436.02	897663	220.00	10.00%	0.00%	9.52%	9.52%
28-08-2022	95127	236.24	22473146.30	0	0.00	0.00	0	0.00	0.00	228488	191.31	43711582.32	1952979	231.10	5.05%	4.87%	0.00%	4.87%
29-08-2022	753	236.94	178414.50	63000	219.84	14949200.00	0	191.46	13019136.12	161241	191.46	30870860.70	1373157	244.20	5.67%	0.05%	4.95%	5.01%



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Date	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price	Amount	Gain (loss) %	Gain (loss) TK	Gain (loss) %	Gain (loss) TK			
01-08-2022	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	0	0.00	0.00	197326	204.20	40293424.00	1274144	265.50	8.72%	2.83%	0.00%	2.83%
01-09-2022	137005	298.22	40858083.00	42753	313.80	13415891.40	0	244.04	10433394.54	280578	244.04	68471942.85	2090917	310.30	7.48%	6.55%	2.04%	8.60%			
05-09-2022	18300	320.17	5859102.40	13400	308.77	4137490.00	0	248.70	3332583.89	285478	248.70	70998461.37	828902	326.40	4.08%	2.21%	1.62%	3.82%			
06-09-2022	27185	336.35	9143586.00	49485	323.15	15990854.30	0	256.32	12684037.49	263178	256.32	67458009.88	1155440	354.40	8.58%	2.35%	4.28%	6.64%			
07-09-2022	0	0.00	0.00	35000	347.92	12177125.80	0	256.32	89711229.91	228178	256.32	58486779.96	1490653	385.40	8.75%	0.00%	2.35%	2.35%			
08-09-2022	1000	418.90	418900.00	0	0.00	0.00	0	0.00	0.00	229178	257.03	58905679.96	1455825	419.00	8.72%	0.07%	0.00%	0.07%			
11-09-2022	45232	412.88	18675414.80	1000	421.40	421400.00	0	282.72	2827196.3	273410	282.72	77298375.13	1357765	407.60	-2.72%	3.33%	0.07%	3.41%			
13-09-2022	0	0.00	0.00	100000	366.90	36600000.00	0	282.72	28271963.40	173410	282.72	49026411.73	805037	395.30	-1.37%	0.00%	12.42%	12.42%			
14-09-2022	17000	428.82	7289882.50	65323	367.63	24014647.20	0	295.76	19320147.51	125087	295.76	36996146.72	1304047	429.80	8.73%	1.30%	5.01%	6.31%			
15-09-2022	40000	467.40	18696000.00	3100	467.40	1448940.00	0	337.35	1045785.89	161987	337.35	54646360.83	464646	467.40	8.75%	8.61%	0.67%	9.28%			
18-09-2022	5000	499.60	2497987.20	24350	469.69	11436920.00	0	342.21	8332773.66	142637	342.21	48811574.37	1437759	508.20	8.73%	0.35%	1.69%	2.04%			
19-09-2022	0	0.00	0.00	91599	475.96	43597179.60	0	342.21	31345943.91	51038	342.21	17465630.47	414861	546.30	7.50%	0.00%	22.08%	22.08%			
20-09-2022	98957	585.08	57897939.90	0	0.00	0.00	0	0.00	0.00	149995	502.44	75363570.37	511515	583.10	6.74%	19.35%	0.00%	19.35%			
21-09-2022	47316	615.66	29130465.10	0	0.00	0.00	0	0.00	0.00	197311	529.59	104494035.47	782367	603.50	3.50%	6.05%	0.00%	6.05%			
22-09-2022	0	0.00	0.00	59107	609.59	36031014.00	0	529.59	31302506.98	138204	529.59	73191528.49	426402	575.60	-4.62%	0.00%	13.86%	13.86%			
25-09-2022	46733	567.61	26526321.40	0	0.00	0.00	0	0.00	0.00	184937	539.20	99717849.89	413576	565.70	-1.72%	11.30%	0.00%	11.30%			
26-09-2022	18530	568.69	10537879.20	0	0.00	0.00	0	0.00	0.00	203467	541.89	110255729.09	210776	570.30	0.81%	8.79%	0.00%	8.79%			
27-09-2022	0	0.00	0.00	35618	573.50	20426982.50	0	541.89	19300862.34	176549	541.89	90954866.74	294784	570.40	0.02%	0.00%	12.08%	12.08%			
28-09-2022	23146	561.44	12995097.40	0	0.00	0.00	0	0.00	0.00	190995	544.25	103949964.14	295591	564.60	-1.02%	7.83%	0.00%	7.83%			
29-09-2022	1008	566.09	570620.00	0	0.00	0.00	0	0.00	0.00	192003	544.37	104520584.14	183670	584.10	3.45%	0.55%	0.00%	0.55%			
02-10-2022	0	0.00	0.00	62600	559.14	35002410.00	0	544.37	34077532.99	129403	544.37	70443051.15	282499	618.50	5.89%	0.00%	22.16%	22.16%			
03-10-2022	64193	649.42	41688420.00	0	0.00	0.00	0	0.00	0.00	193596	579.20	112131471.15	308072	652.50	5.50%	20.84%	0.00%	20.84%			
04-10-2022	0	0.00	0.00	8341	699.04	5830677.40	0	579.20	4831135.98	185255	579.20	107300335.17	425765	701.40	7.49%	0.00%	1.96%	1.96%			
06-10-2022	90	740.20	66618.00	15000	725.17	10877500.00	0	579.28	8689224.41	170345	579.28	98677728.77	246954	753.70	7.46%	0.04%	6.07%	6.11%			
10-10-2022	13552	790.75	10716189.20	5999	796.76	4779742.90	0	594.87	3568596.08	177898	594.87	105825321.88	555119	799.70	6.10%	2.44%	1.08%	3.52%			
11-10-2022	2085	821.61	1713066.00	0	0.00	0.00	0	0.00	0.00	179983	597.49	107538387.88	191924	859.60	7.49%	1.09%	0.00%	1.09%			
12-10-2022	4100	911.41	3736765.20	0	0.00	0.00	0	0.00	0.00	184083	604.48	111275153.08	344616	919.60	6.98%	1.19%	0.00%	1.19%			

Summary of the trade by Risana Karim:

Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty	Price (W.Avg.)	Amount
32500	105.00	3510000.00	450362	392.54	176783308.80	1785386	258.97	462356987.90	1601303	261.09	418087664.80	219.25	351081834.82	184083	604.48	111275153.08

iii. Gain/Loss by Risana Karim from 21.06.2022 to 12.10.2022:

Realized Capital gain(loss)per unit	41.84	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	19.09%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	67,005,829.98	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (12-10-2022)	919.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	315.12	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	52.13%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	58,007,573.72	Quantity of Stock Position x Unrealized gain (loss) per unit

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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক মার্চ ০৯, ২০২৩ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/২৬০ স্মারকমূলে Mrs. Risana Karim-কে মার্চ ২৭, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে Mrs. Risana Karim এর পক্ষে Mr. Mohiuddin Sheikh Jibon (on behalf) শুনানীতে উপস্থিত হয়ে মার্চ ২০, ২০২৩ তারিখের BPL/CA/BSEC/SHOWCAUSE-REPLY/2023/MAR/02 পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন:

"With reference to your letter No. BSEC/Enforcement/3406/2023/260, Dated 09 March, 2023 on the above subject, I like to inform that, I have been maintaining 3 (three) nos Beneficial Owner account bearing No. 1203710043493921, 1205590043493921 and 1205590075153283 maintaining with AB Securities Limited and UCB Stock Brokerage Limited respectively. As per Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 the series of transactions of shares are strictly prohibited. But unfortunately, I have made few transactions without knowing the restrictions of the Act from the period of 21 June 2022 to 12 October 2022. I do hereby inform that except those incidents I have been complying all the laws, rules and regulations of BSEC on the above mentioned period.

So, you are therefore requested to consider this issue as very generously and I like to assure you that I will comply all the laws, rules and regulations of BSEC in future."



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যেহেতু, Mrs. Risana Karim-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন থেকে প্রতীয়মান হয় যে, তার বিরুদ্ধে উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mrs. Risana Karim -এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

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

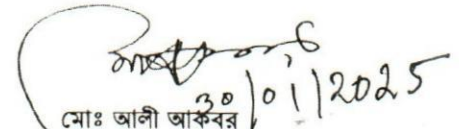
যেহেতু, Mrs. Risana Karim-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mrs. Risana Karim-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-

- Mrs. Risana Karim-কে মোট ৬.০০ (ছয়) কোটি টাকা অর্থদণ্ডে দণ্ডিত করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

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