

Bangladesh Securities and Exchange Commission

Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৮৬

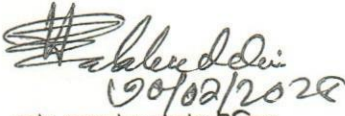
তারিখঃ জানুয়ারি ৩০, ২০২৫

Mrs. Nurunnahar Karim
(BO ID # 1203710075253110)
House # 20, Road # 79
Gulshan-2, Dhaka

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪০৬/২০২৩/৮৫ তারিখঃ জানুয়ারি ৩০, ২০২৫ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


৩০/০১/২০২৫

মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

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

ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/MSI/2003-0170]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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তারিখঃ জানুয়ারি ৩০, ২০২৫

সাদেশ

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:

I. 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 Ekhlasur 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	Mohammad Ekhlasur 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	268500	268500	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			
	BOID # 1601880043377493				BOID # 1203710046187231				BOID # 1601880046187231				BOID # 1203710043493921				BOID # 1205590043493921				BOID # 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	82.28	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	12133	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	49872	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	82771	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	0	0.00	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	0	0.00	0	0.00	40000	92.78	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	91273	94.86	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	18360	96.72	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-07-22	37343	96.98	0	0.00	27620	96.85	5000	98.70	0	0.00	0	0.00	4100	95.59	9000	96.30	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	18003	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	105.13	22000	105.61	0	0.00	0	0.00
21-07-22	50343	106.75	0	0.00	118230	107.10	71000	106.36	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	108.94	41331	110.40	0	0.00	0	0.00	50000	107.22	41000	109.36	20000	108.10	20000	109.90	0	0.00	0	0.00
25-07-22	0	0.00	0	0.00	22791	107.60	52822	107.75	0	0.00	0	0.00	33875	106.90	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-07-22	143566	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	109.01	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	78339	125.07	0	0.00	12505	123.08	179505	125.29	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	320022	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	133.22	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-08-22	57487	133.83	0	0.00	103000	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	87569	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	40585	143.57	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
21-08-22	3252	158.43	0	0.00	0	0.00	69000	150.32	0	0.00	0	0.00	6300	149.35	0	0.00	39000	145.76	40000	142.26	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	6300	149.35	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
23-08-22	0	0.00	0	0.00	0	0.00	31000	186.73	0	0.00	0	0.00	0	0.00	36000	168.45	39000	166.15	38000	172.54	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	2000	185.00	0	0.00	0	0.00	0	0.00	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	62000	194.87	0	0.00	36000	191.64	35000	198.95	0	0.00	0	0.00
28-08-22	145245	230.11	95	222.40	135603	234.07	3134	236.44	0	0.00	0	0.00	0	0.00	85000	209.96	0	0.00	500	220.00	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	75627	236.50	0	0.00	19500	235.25	0	0.00	0	0.00	0	0.00
30-08-22	154909	264.25	0	0.00	0	0.00	36130	256.96	0	0.00	0	0.00	0	0.00	0	0.00	753	236.94	18000	244.40	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	36085	261.12	0	0.00	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	0	0.00	11000	287.72	0	0.00	0	0.00	0	0.00	0	0.00
04-09-22	298282	313.18	0	0.00	0	0.00	14410	314.74	0	0.00	0	0.00	9200	307.47	0	0.00	44153	301.02	42753	313.80	83652	295.73	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	0	0.00	1000	418.90	0	0.00	0	0.00	0	0.00	0	0.00
11-09-22	544762	428.52	0	0.00	17230	410.46	7991	429.02	0															

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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

Date	Buy				Sale				Cost of shares sold				Stock Position				Comparison with the Market			
	Qty.	Price	Amount	Qty.	Price	Amount	Price (W.Avg)	Amount	Qty.	Price (W.Avg)	Amount	Price (W.Avg)	Amount	Mkt	Mkt	Change	Buy	Sale	Client	Client
21-06-22	10000	80.93	809307.80	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.99%	2.99%	0.00%	0.00%	2.99%
22-06-22	3100	82.28	25509.30	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.99%	2.99%	0.00%	0.00%	2.99%
23-06-22	153916	85.81	13207339.30	8000	84.61	676900.00	85.45	683609.06	159016	85.08	13588097.34	159016	85.08	13588097.34	159016	1.10%	2.25%	1.75%	0.00%	1.75%
26-06-22	109934	84.55	9295185.10	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.10%	2.65%	1.75%	0.00%	1.75%
27-06-22	82771	84.09	6960530.60	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.10%	2.65%	1.75%	0.00%	1.75%
28-06-22	77839	85.05	6194966.90	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.10%	2.65%	1.75%	0.00%	1.75%
29-06-22	106779	86.86	9274727.40	25868	87.12	2255559.00	85.28	2206067.70	505471	85.28	43107439.63	505471	85.28	43107439.63	770145	0.00%	26.10%	0.00%	0.00%	26.10%
30-06-22	186728	87.42	16324191.60	39485	86.40	3411615.50	85.86	3390149.31	652714	85.86	56041481.93	652714	85.86	56041481.93	465637	8.48%	3.36%	17.22%	48.58%	17.22%
03-07-22	74735	87.46	6536657.20	23664	86.44	2045569.60	86.02	2035674.09	703785	86.02	60542465.03	703785	86.02	60542465.03	329656	7.18%	29.85%	48.58%	29.85%	7.18%
04-07-22	102145	89.48	9139429.90	149264	89.00	13283933.00	86.46	12905585.31	656666	86.46	56776309.63	656666	86.46	56776309.63	594468	3.58%	42.29%	29.85%	42.29%	3.58%
05-07-22	219157	93.30	20441771.20	27938	92.57	2586117.60	88.17	2463380.13	847885	88.17	74760650.70	847885	88.17	74760650.70	779820	3.58%	31.69%	42.29%	31.69%	3.58%
06-07-22	301429	94.20	28394845.40	16437	94.91	1560100.50	89.75	1475286.03	1132877	89.75	101680210.07	1132877	89.75	101680210.07	1725375	1.71%	18.42%	31.69%	18.42%	1.71%
07-07-22	213877	97.15	20777269.50	338295	95.85	32424529.40	90.93	30760444.52	1008459	90.93	91697034.05	1008459	90.93	91697034.05	1282519	0.95%	43.05%	31.69%	43.05%	0.95%
14-07-22	74065	95.64	7083893.00	69800	96.02	6701960.00	91.25	6369289.46	1012724	91.25	92411637.58	1012724	91.25	92411637.58	519240	13.44%	27.11%	31.69%	27.11%	13.44%
17-07-22	64963	96.92	6296485.70	33000	97.65	3222460.00	91.59	3022554.85	1044687	91.59	95685568.43	1044687	91.59	95685568.43	767784	4.30%	12.76%	31.69%	12.76%	4.30%
18-07-22	142851	99.78	14253451.30	136530	100.21	13681929.30	92.58	1263973.95	1051008	92.58	97299445.79	1051008	92.58	97299445.79	1383331	10.33%	20.20%	31.69%	20.20%	10.33%
19-07-22	75000	98.40	7380150.00	2951	99.30	293034.30	92.97	274340.40	1123057	92.97	104405255.38	1123057	92.97	104405255.38	621949	12.06%	6.06%	31.69%	6.06%	12.06%
20-07-22	26110	105.05	2742884.90	73000	103.01	751978.20	93.24	6806507.88	1076167	93.24	100341632.40	1076167	93.24	100341632.40	1634961	4.46%	21.28%	31.69%	21.28%	4.46%
21-07-22	117573	106.98	125454516.60	84000	106.49	894497.30	95.13	7990828.63	1163740	95.13	110705320.37	1163740	95.13	110705320.37	1201045	14.29%	31.20%	31.69%	31.20%	14.29%
24-07-22	572229	110.20	63060558.60	102331	109.89	11244736.50	100.10	10243060.88	1633638	100.10	16332818.09	1633638	100.10	16332818.09	2162191	1.12%	4.73%	31.69%	4.73%	1.12%
25-07-22	93666	107.45	10064063.70	16657	106.70	17771034.80	100.50	16738287.11	1560747	100.50	156848594.68	1560747	100.50	156848594.68	1057758	0.46%	24.60%	31.69%	24.60%	0.46%
26-07-22	235741	108.88	2567106.20	159429	108.90	17362539.40	101.60	16197332.60	1637059	101.60	166318378.29	1637059	101.60	166318378.29	1045216	1.02%	37.81%	31.69%	37.81%	1.02%
27-07-22	205200	107.18	21993050.00	39294	108.67	4270072.40	102.22	4016541.25	1802965	102.22	1844294887.04	1802965	102.22	1844294887.04	803203	1.93%	30.44%	31.69%	30.44%	1.93%
28-07-22	60554	104.78	6345076.80	10004	104.70	1047418.80	102.30	1023419.78	1853515	102.30	189616544.06	1853515	102.30	189616544.06	336194	18.01%	20.99%	31.69%	20.99%	18.01%
31-07-22	49416	112.99	5583433.20	106421	112.42	11963994.50	102.58	10916516.04	196510	102.58	184283461.22	196510	102.58	184283461.22	1645491	3.00%	9.47%	31.69%	9.47%	3.00%
01-08-22	439225	118.04	51847012.90	219940	118.68	26102709.50	105.62	23229289.91	2015795	105.62	212901184.21	2015795	105.62	212901184.21	1612628	1.20%	40.88%	31.69%	40.88%	1.20%
02-08-22	257857	118.72	3069332.00	177091	117.88	2071052.80	106.88	1892631.07	2096561	106.88	22407288.14	2096561	106.88	22407288.14	1317898	0.51%	33.00%	31.69%	33.00%	0.51%
03-08-22	132844	123.23	16370777.80	286505	124.12	3556660.80	107.85	30899838.45	1942900	107.85	209543624.49	1942900	107.85	209543624.49	1621332	8.19%	25.86%	31.69%	25.86%	8.19%
04-08-22	210769	130.99	27608106.50	218069	131.41	2865884.80	110.12	24012715.43	1935600	110.12	213139015.56	1935600	110.12	213139015.56	1354912	5.42%	31.65%	31.69%	31.65%	5.42%
07-08-22	538022	130.84	7039999.40	239986	131.49	3156565.60	114.62	27507822.18	2233636	114.62	256025192.77	2233636	114.62	256025192.77	1254586	0.68%	62.01%	31.69%	62.01%	0.68%
08-08-22	219577	132.83	29166915.40	360736	132.81	47910937.10	116.25	41936456.53	2092477	116.25	243255651.64	2092477	116.25	243255651.64	1291450	1.90%	44.93%	31.69%	44.93%	1.90%
10-08-22	277843	134.02	3666062.60	62084	134.00	8318986.30	118.30	7344651.59	2303236	118.30	272477062.65	2303236	118.30	272477062.65	862063	0.15%	38.85%	31.69%	38.85%	0.15%
11-08-22	27722	130.64	3622080.30	144237	127.09	18331797.50	119.63	17254741.61	2436251	119.63	291443121.34	2436251	119.63	291443121.34	1353231	2.39%	31.14%	31.69%	31.14%	2.39%
14-08-22	139669	129.37	18068848.70	20000	130.30	2606000.00	120.16	2403117.88	255920	120.16	307108852.17	255920	120.16	307108852.17	557873	-1.07%	28.62%	31.69%	28.62%	-1.07%
16-08-22	0	0.00	0.00	60000	131.92	7915150.00	120.16	7209353.63	249520	120.16	299899498.54	249520	120.16	299899498.54	135219	0.00%	4.43%	31.69%	4.43%	0.00%
17-08-22	80673	144.63	1167992.40	72528	142.71	1079861.60	120.92	9100368.68	2501335	120.92	302467122.26	2501335	120.92	302467122.26	762354	3.18%	20.45%	31.69%	20.45%	3.18%
25-08-22	8513	212.50	1809017.00	85500	210.02	17956893.60	127.63	10912677.06	2352084	127.63	300205065.61	2352084	127.63	300205065.61	897663	10.00%	18.21%	31.69%	18.21%	10.00%
28-08-22	375975	233.09	87635854.00	98529	203.30	20031125.80	142.17	14007606.86	2629530	142.17	37383312.75	2629530	142.17	37383312.75	1952979	5.05%	24.30%	31.69%	24.30%	5.05%
29-08-22	81810	218.11	17843628.50	484906	216.23	104850270.00	144.46	70048942.17	2226434	144.46	321627999.07	2226434	144.46	321627999.07	1373157	5.67%	41.27%	31.69%	41.27%	5.67%
30-08-22	265494	257.05	68245550.90	611630	227.59	139202347.00	156.45	95627315.10	1880298	156.45	294181234.88	1880298	156.45	294181234.88	1274144	8.72%	68.84%	31.69%	68.84%	8.72%
31-08-22	43952	287.18	126346452.30	11000	287.72	3164950.00	181.24	1993666.44	2309250	181.24	418534020.74	2309250	181.24	418534020.74	1270924	8.74%	35.48%	31.69%	35.48%	8.74%
01-09-22	348896	303.23	105794124.80	295753	283.55	83859391.40	197.25	5838263.60	236293	197.25	465989881.94	236293	197.25	465989881.94	2090917	7.48%	30.83%	31.69%	30.83%	7.48%
04-09-22	37725	312.66	117958124.20	417718	284.29	118752205.60	213.15	8903427.28	221950	213.15	494913278.86	221950	213.15	494913278.86	1943211	1.06%	40.91%	31.69%	40.91%	1.06%
05-09-22	58400	312.66	18926942.40	19400	314.17	6094990.00	215.87	4187829.64	23609											

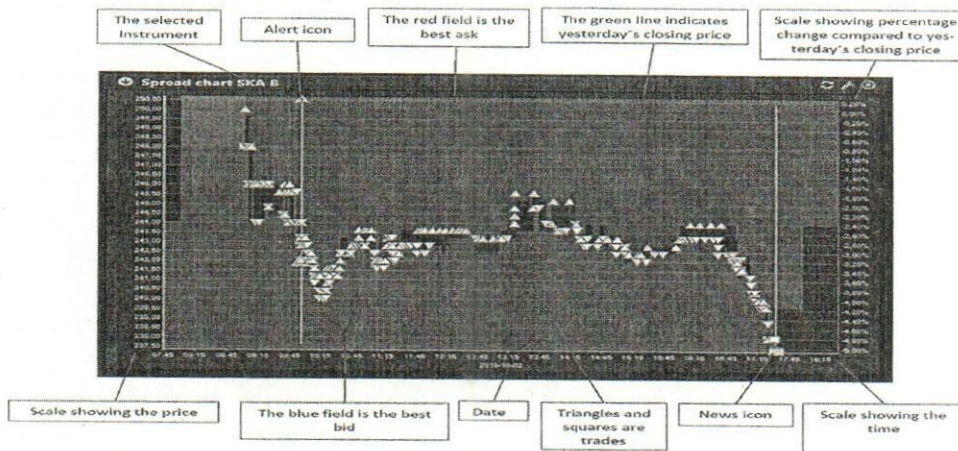
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06-09-22	125888	350.89	44173280.70	255485	304.14	77703854.30	222.70	56897213.20	2231353	222.70	496928459.11	1155440	354.40	8.58%	10.90%	22.11%	33.01%
07-09-22	274750	378.22	103914811.10	150000	329.58	49437125.80	239.75	35962803.82	2356103	239.75	564880466.39	1490653	385.40	8.75%	18.43%	10.06%	28.49%
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	115137972.70	291.56	87026876.82	7324898	291.56	677818232.55	1367765	407.60	2.72%	11.72%	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	113420	502.85	58039117.90	189250	430.43	78606320.00	324.69	58524958.39	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	2207905	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	236.30	2586852257.00	8903869	252.27	2246141781.80	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:



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

(Handwritten signature)

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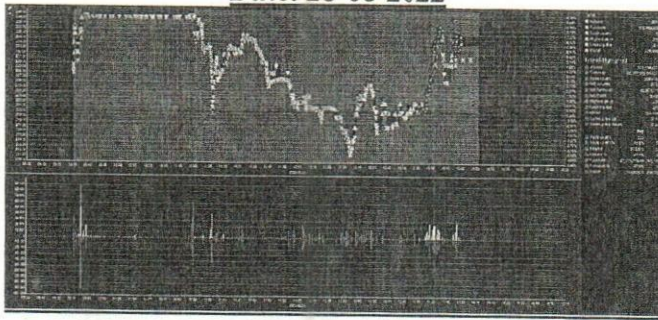
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△ White triangle represents trade of ORIONINFU by other clients

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:

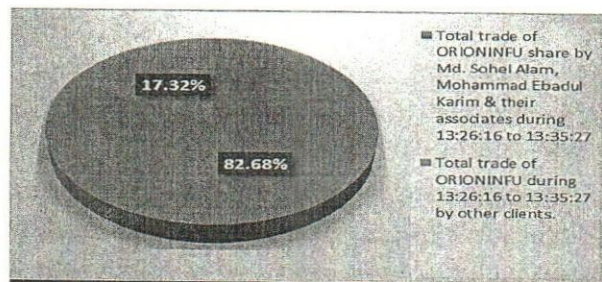
BOIDs: 1601880043377493; 1203710046187231; 1601880046187231; 1203710043493921;
1205590043493921; 1205590075153283; 1203710064196682; 1605170064196682;
1601880064821881; 1601880065365037; 1203710048667734; 1203710075253110
(Combined)

Date: 28-08-2022



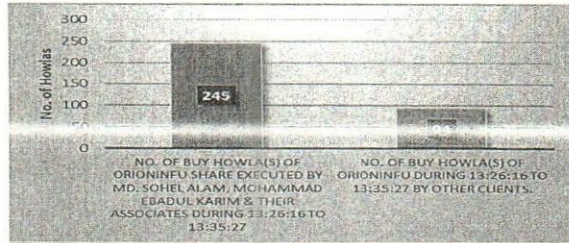
It was observed in the above graph that on 28-08-2022, total number of trades of ORIONINFU in the market was 3303, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 525 which is approximately 15.89% of the total number of trades in the market. 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.



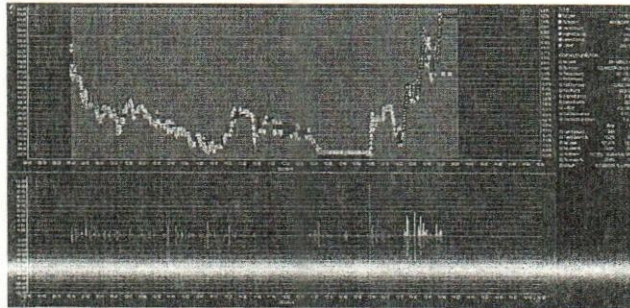
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It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 245 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 339 as shown in the following Bar Chart.



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.

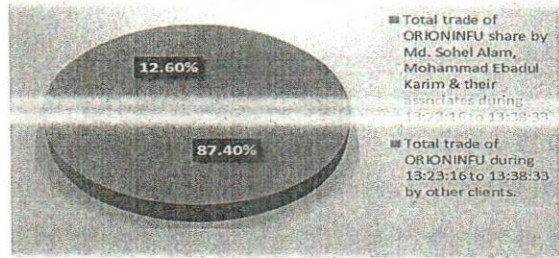
Date: 04-09-2022



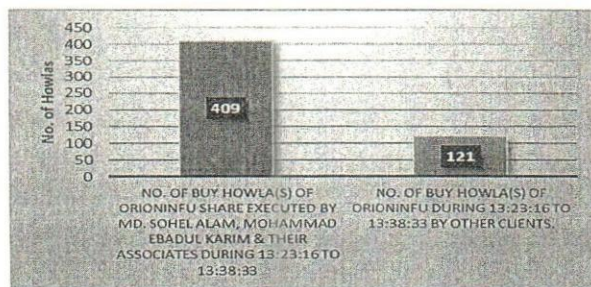
It was observed in the above graph that on 04-09-2022, total number of trades of ORIONINFU in the market was 4000, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 649 which is approximately 16.23% of the total number of trades in the market. 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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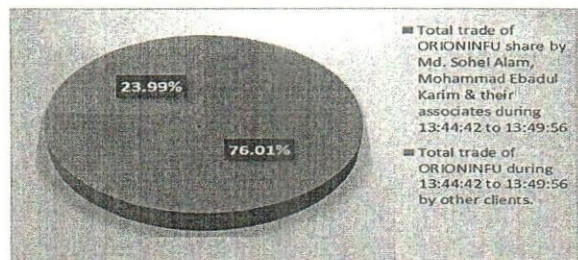


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 409 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 530 as shown in the following Bar Chart.



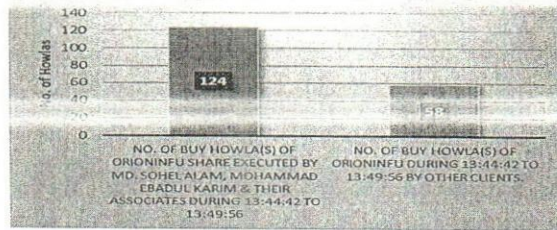
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 87.40% of the total trades of ORIONINFU shares by executing 409 of total 530 howlas from 13:23:16 to 13:38:33 on 04-09-2022. From 13:23:16 to 13:38:33, Md. Sohel Alam, Mohammad Ebadul 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.



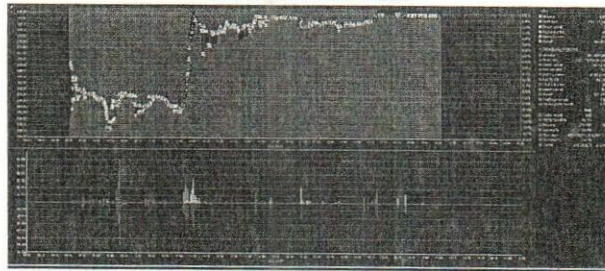
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 124 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 182 as shown in the following Bar Chart.

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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.

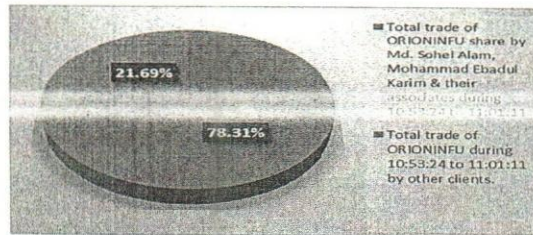
Date: 07-09-2022



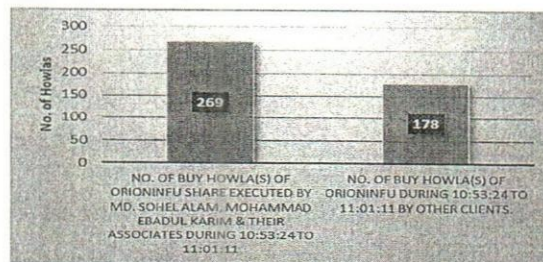
It was observed in the above graph that on 07-09-2022, total number of trades of ORIONINFU in the market was 2876, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 440 which is approximately 15.30% of the total number of trades in the market. 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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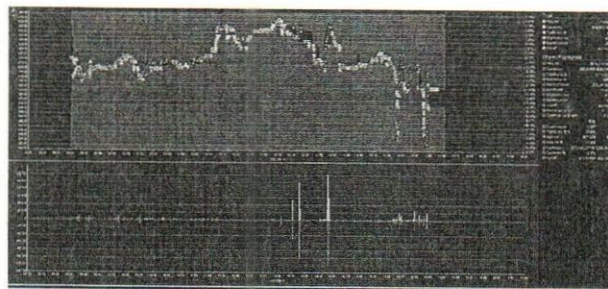


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 269 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 447 as shown in the following Bar Chart.



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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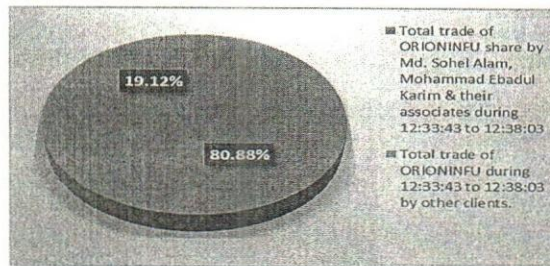
Enforcement Division

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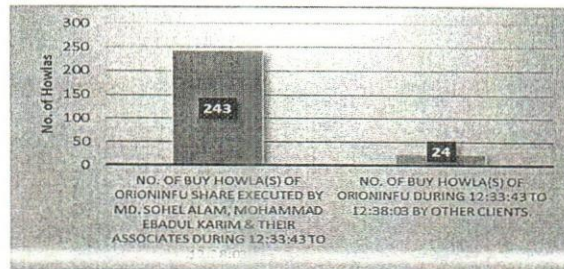
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On 11-09-2022, trading of ORIONINFU share was started at Tk. 420.00 which is Tk. 1.00 more than the YCP of Tk. 419.00. On that day, Md. Sohel Alam, Mohammad Ebadul Karim and their associates started series of trading at 12:33:43 at price Tk. 415.40 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.



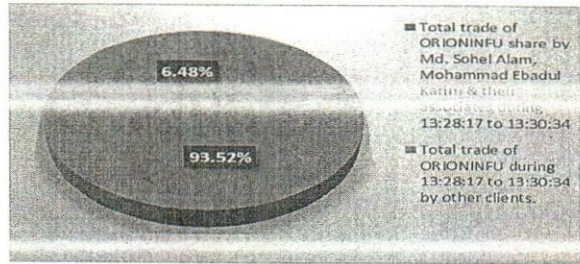
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 243 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 267 as shown in the following Bar Chart.



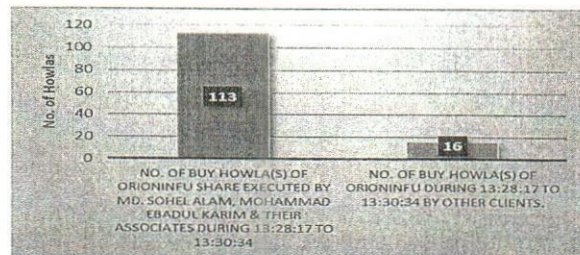
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 80.88% of the total trades of ORIONINFU shares by executing 243 of total 267 howlas from 12:33:43 to 12:38:03 on 11-09-2022. From 12:33:43 to 12:38:03, Md. Sohel Alam, Mohammad Ebadul 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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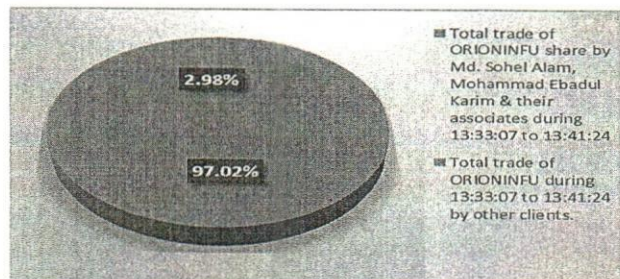


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 113 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 129 as shown in the following Bar Chart.



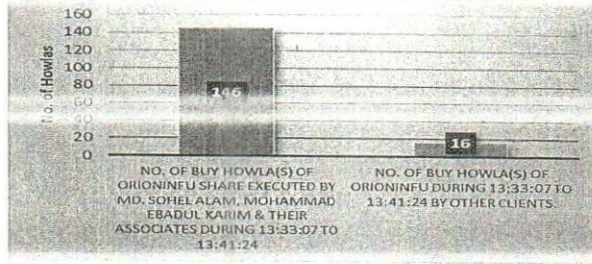
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 93.52% of the total trades of ORIONINFU shares by executing 113 of total 129 howlas from 13:28:17 to 13:30:34 on 11-09-2022. From 13:28:17 to 13:30:34, Md. Sohel Alam, Mohammad Ebadul 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.



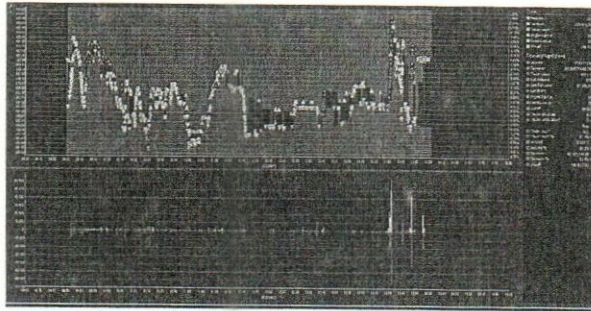
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 146 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 162 as shown in the following Bar Chart.

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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.

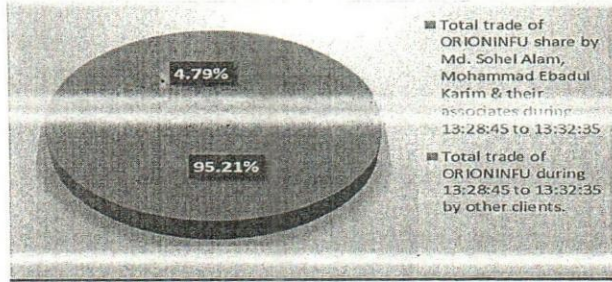
Date: 12-09-2022



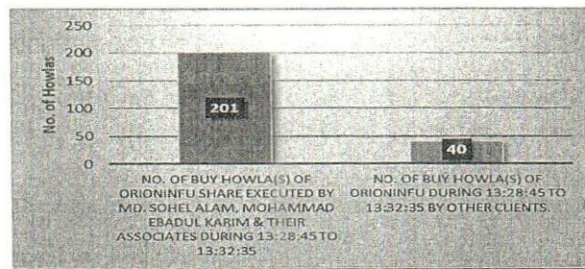
It was observed in the above graph that on 12-09-2022, total number of trades of ORIONINFU in the market was 2711, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 465 which is approximately 17.15% of the total number of trades in the market. 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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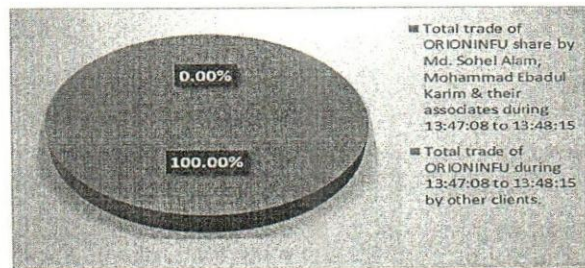


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 201 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 241 as shown in the following Bar Chart.



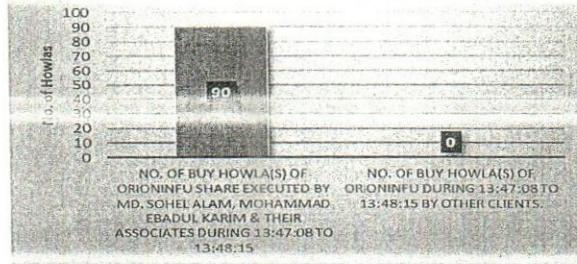
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 95.21% of the total trades of ORIONINFU shares by executing 201 of total 241 howlas from 13:28:45 to 13:32:35 on 12-09-2022. From 13:28:45 to 13:32:35, Md. Sohel Alam, Mohammad Ebadul 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.



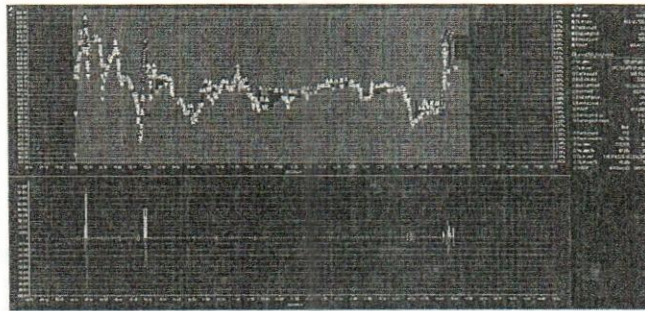
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 90 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 90 as shown in the following Bar Chart.

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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.

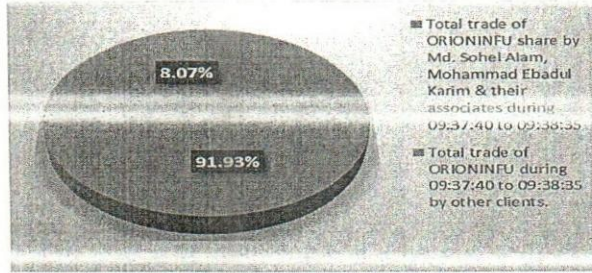
Date: 21-09-2022



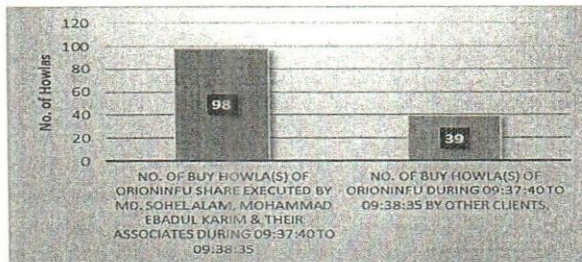
It was observed in the above graph that on 21-09-2022, total number of trades of ORIONINFU in the market was 3376, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 530 which is approximately 15.70% of the total number of trades in the market. 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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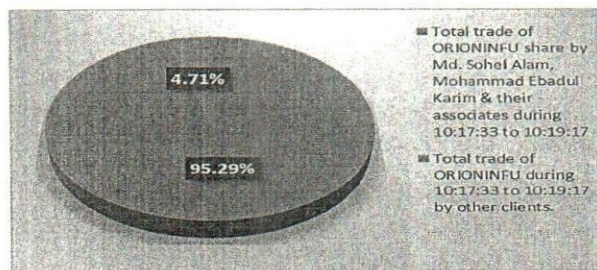


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 98 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 137 as shown in the following Bar Chart.



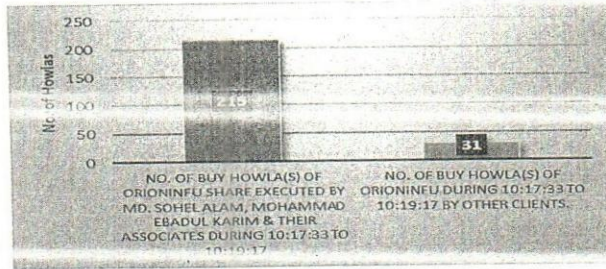
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 91.93% of the total trades of ORIONINFU shares by executing 98 of total 137 howlas from 9:37:40 to 9:38:35 on 21-09-2022. From 9:37:40 to 9:38:35, Md. Sohel Alam, Mohammad Ebadul 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 138,639 shares of ORIONINFU compared to the total traded share of 145,489. This is shown in the following Pie Chart.



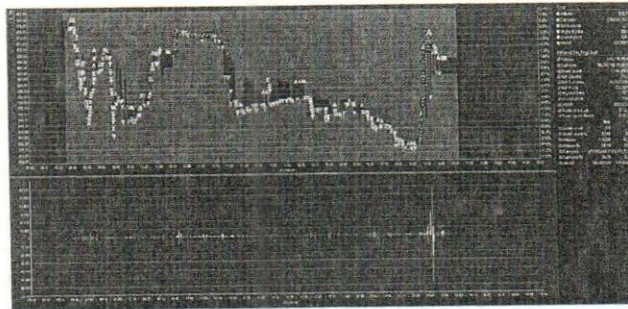
It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 215 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 246 as shown in the following Bar Chart.

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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.

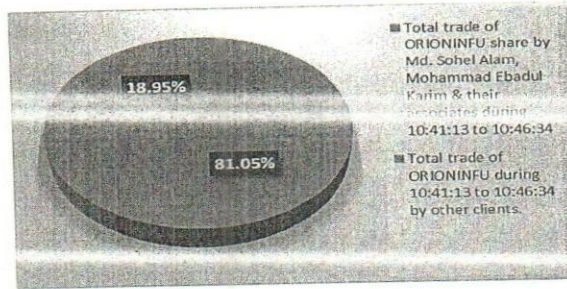
Date: 25-09-2022



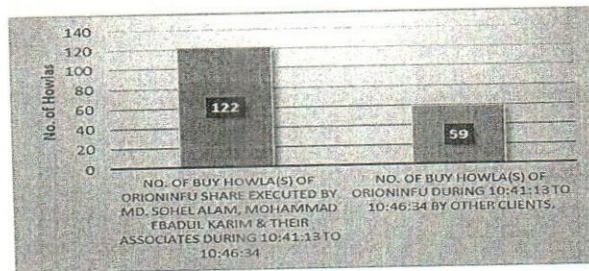
It was observed in the above graph that on 25-09-2022, total number of trades of ORIONINFU in the market was 2567, whereas number of trades (buy) executed by Md. Sohel Alam, Mohammad Ebadul Karim and their associates were 715 which is approximately 27.85% of the total number of trades in the market. 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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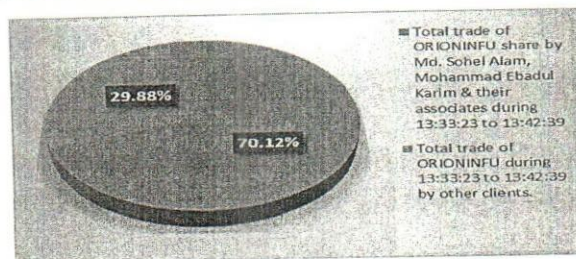


It is also found that during the aforementioned period, Md. Sohel Alam, Mohammad Ebadul Karim and their associates executed 122 howlas to purchase of shares of ORIONINFU compared to the total number of howlas of 181 as shown in the following Bar Chart.



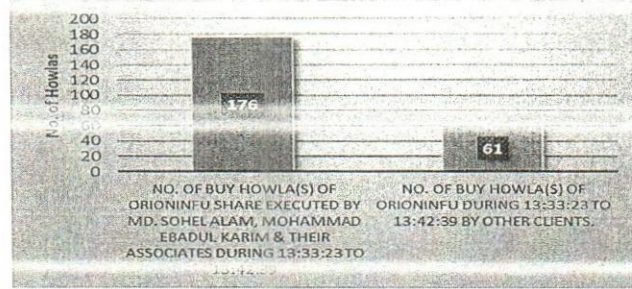
It is observed from the above graphs and screenshot that Md. Sohel Alam, Mohammad Ebadul Karim and their associates bought 81.05% of the total trades of ORIONINFU shares by executing 122 of total 181 howlas from 10:41:13 to 10:46:34 on 25-09-2022. From 10:41:13 to 10:46:34, Md. Sohel Alam, Mohammad Ebadul 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.



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
04/07/2022	13:10:21	253520899	ORIONINFU	900	88.9	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public

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24/08/2022	13:34:08	258866413	ORIONINFU	203.3	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:13	258866511	ORIONINFU	541	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:17	258866512	ORIONINFU	476	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:13	258866613	ORIONINFU	532	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:35	258866695	ORIONINFU	1011	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867390	ORIONINFU	145	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867391	ORIONINFU	12	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867392	ORIONINFU	355	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:34:56	258867393	ORIONINFU	1000	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:35:16	258867477	ORIONINFU	32	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:45:07	258881057	ORIONINFU	2000	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:45:21	258881478	ORIONINFU	1000	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:45:59	258882443	ORIONINFU	1000	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:46:19	258883024	ORIONINFU	2000	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:46:19	258883025	ORIONINFU	2000	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
24/08/2022	13:46:19	258883026	ORIONINFU	1000	DSEMTB	23176	1601880043377493	DSEUBR	11755	1205590043493921	Public
29/08/2022	13:30:35	259738873	ORIONINFU	5	DSEUBR	11755	1205590043493921	DSEUBR	11755	1205590043493921	Public
29/08/2022	13:34:32	259743332	ORIONINFU	14500	DSEMTB	22985	1601880065356037	DSEABF	5058	1203710046187231	Public
29/08/2022	13:38:48	259749610	ORIONINFU	50000	DSEMTB	22936	1601880064821881	DSEABF	3214	1203710046187231	Block
30/08/2022	10:30:50	259850744	ORIONINFU	1000	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:30:54	259850817	ORIONINFU	67	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:30:54	259850818	ORIONINFU	1033	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:31:22	259851280	ORIONINFU	900	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:29	259852363	ORIONINFU	66	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:29	259852644	ORIONINFU	1934	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:33	259852423	ORIONINFU	66	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:33	259852424	ORIONINFU	934	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:55	259852443	ORIONINFU	1000	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:55	259852807	ORIONINFU	66	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:32:55	259852808	ORIONINFU	1745	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:33:03	259852922	ORIONINFU	255	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	10:33:03	259852993	ORIONINFU	745	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
30/08/2022	12:30:30	259965200	ORIONINFU	44500	DSEABF	5674	1203710075253110	DSEMTB	22936	1601880064821881	Block
31/08/2022	10:38:54	260159372	ORIONINFU	2000	DSEABF	22985	1601880065356037	DSEABF	3214	1203710046187231	Public
01/09/2022	09:38:02	260399501	ORIONINFU	42000	DSEABF	3371	1203710046187231	DSEUBR	11755	1205590043493921	Public
04/09/2022	13:25:20	260953777	ORIONINFU	200	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/09/2022	13:25:41	260954110	ORIONINFU	200	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/09/2022	13:25:47	260954232	ORIONINFU	200	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
04/09/2022	13:26:07	260954638	ORIONINFU	200	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
06/09/2022	13:04:21	261394140	ORIONINFU	61	DSEUBR	11755	1205590043493921	DSEABF	3371	1203710046187231	Public
07/09/2022	10:54:15	261558079	ORIONINFU	995	DSEABF	358.5	1605170064190682	DSEABF	3214	1203710046187231	Public
07/09/2022	10:54:15	261558080	ORIONINFU	5	DSEABF	358.5	1605170064190682	DSEABF	3214	1203710046187231	Public
07/09/2022	10:54:45	261558573	ORIONINFU	1000	DSEABF	359.9	1605170064190682	DSEABF	3214	1203710046187231	Public
07/09/2022	10:57:38	261561928	ORIONINFU	625	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710046187231	Public
07/09/2022	10:57:38	261561929	ORIONINFU	375	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710046187231	Public
07/09/2022	10:58:21	261562640	ORIONINFU	100	DSEABF	378.9	1605170064190682	DSEABF	3214	1203710046187231	Public
07/09/2022	10:58:31	261562780	ORIONINFU	430	DSEABF	378.9	1605170064190682	DSEABF	3214	1203710046187231	Public
07/09/2022	10:58:50	261563698	ORIONINFU	370	DSEABF	378.9	1605170064190682	DSEABF	3214	1203710046187231	Public
07/09/2022	12:18:26	261633699	ORIONINFU	221	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710046187231	Public
07/09/2022	12:18:26	261636999	ORIONINFU	1000	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710046187231	Public
07/09/2022	13:13:13	261675217	ORIONINFU	279	DSEMTB	23176	1601880043377493	DSEABF	3214	1203710046187231	Public
07/09/2022	13:35:38	261703566	ORIONINFU	2279	DSEMTB	10310	1601880046187231	DSEABF	3214	1203710046187231	Public
11/09/2022	12:36:12	262146278	ORIONINFU	500	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
11/09/2022	12:37:09	262147015	ORIONINFU	500	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:41:34	262642118	ORIONINFU	63	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:41:34	262642119	ORIONINFU	937	DSEMTB	23176	1601880043377493	DSEABF	3371	1203710046187231	Public
13/09/2022	13:45:34	262648774	ORIONINFU	9000	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710046190682	Public
13/09/2022	13:45:34	262648776	ORIONINFU	9000	DSEMTB	23176	1601880043377493	DSEABF	5058	1203710046190682	Public

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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	09:32:05	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
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.

Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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Observation - 3:

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:

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	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage
1	MD. SOHEL ALAM	23176	MTB Securities Limited	859852.00	4.22%	959852.00	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 KARIM	3371	AB Securities Limited	658263.00	3.23%	543263.00	2.67%	646263.00	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 KARIM	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	RISANA KARIM	3214	AB Securities Limited	66784.00	0.33%	184224.00	0.90%	142140.00	0.70%	195061.00	0.96%	195061.00	0.96%	195061.00	0.96%	160061.00	0.79%	166361.00	0.81%
5	RISANA KARIM	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	RISANA KARIM	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	425837.00	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-EPF	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-EGF	22985	MTB Securities Limited	45000.00	0.22%	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 KARIM	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				2228736.00	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	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage	Total Qty	Per centage
1	MD. SOHEL ALAM	23176	MTB Securities Limited	1039090.00	5.10%	1039090.00	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 KARIM	3371	AB Securities Limited	596681.00	2.93%	565681.00	2.78%	471645.00	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 KARIM	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	RISANA KARIM	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	RISANA KARIM	11755	UCB Stock Brokerage Limited	35000.00	0.17%		0.00%	10000.00	0.05%	10000.00	0.05%	30000.00	0.15%	42753.00	0.21%	42753.00	0.21%	44153.00	0.22%
6	RISANA KARIM	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-EPF	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-EGF	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 KARIM	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															

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Bangladesh Securities and Exchange Commission
Enforcement Division
Enforcement Department
Market, Market Intermediaries and Other Affairs Section
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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			
				Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage		
1	MD. SOHEL ALAM	23176	MTB Securities Limited	1233398.00	6.06%	1273498.00	6.25%	1073498.00	5.27%	1213498.00	5.96%	1242270.00	6.10%	1142270.00	5.61%	1253887.00	6.16%	1041499.00	5.17%
2	MOHAMMAD EBADUL KARIM	3371	AB Securities Limited	195968.00	0.96%	189968.00	0.93%	183968.00	0.90%	185968.00	0.91%	192207.00	0.95%	195207.00	0.96%	193207.00	0.95%	156986.00	0.77%
3	MOHAMMAD EBADUL KARIM	10310	MTB Securities Limited	0.00	0.00%	0.00	0.00%	98703.00	0.48%	118703.00	0.58%	78355.00	0.38%	160104.00	0.79%	160104.00	0.79%	118841.00	0.66%
4	RISANA KARIM	3214	AB Securities Limited	152773.00	0.75%	157573.00	0.77%	137758.00	0.68%	102758.00	0.50%	147990.00	0.73%	147990.00	0.73%	47990.00	0.24%	105888.00	0.52%
5	RISANA KARIM	11755	UCB Stock Brokerage Limited	44153.00	0.22%	43753.00	0.21%	41268.00	0.20%	41268.00	0.20%	41268.00	0.20%	41268.00	0.20%	41268.00	0.20%	40474.00	0.15%
6	RISANA KARIM	11788	UCB Stock Brokerage Limited	8452.00	0.41%	8452.00	0.41%	8452.00	0.41%	8452.00	0.41%	8452.00	0.41%	8452.00	0.41%	8452.00	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	1.12%
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-EGF	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 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%
Total				2317050.00	11.38%	2356050.00	11.57%	2226453.00	10.94%	2238453.00	10.99%	2319998.00	11.40%	2438475.00	11.98%	2438974.00	11.98%	2201005.00	10.81%
Total No. of Outstanding Securities				20359760															

Sl. No	Client Name	Client Code	Name of TREC Holder	22-09-22		25-09-22		26-09-22		27-09-22		28-09-22		29-09-22		02-10-22		03-10-22		04-10-22		12-10-22	
				Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage	Total Qty	Percent tage
1	MD. SOHEL ALAM	23176	MTB Securities Limited	981749.00	4.82%	1039222.00	5.10%	1039222.00	5.10%	992222.00	4.87%	1036270.00	5.09%	1017270.00	5.00%	1017270.00	5.00%	1017270.00	5.00%	977270.00	4.75%	977104.00	4.80%
2	MOHAMMAD EBADUL KARIM	3371	AB Securities Limited	176415.00	0.87%	136465.00	0.67%	156565.00	0.77%	191221.00	0.94%	188221.00	0.92%	165998.00	0.82%	173998.00	0.85%	167418.00	0.82%	175759.00	0.86%	164997.00	0.81%
3	MOHAMMAD EBADUL KARIM	10310	MTB Securities Limited	133843.00	0.66%	133843.00	0.66%	133843.00	0.66%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	136343.00	0.67%	28844.00	0.14%
4	RISANA KARIM	3214	AB Securities Limited	46781.00	0.23%	93514.00	0.46%	112044.00	0.55%	78426.00	0.38%	99572.00	0.49%	100580.00	0.49%	37980.00	0.19%	102163.00	0.50%	93822.00	0.46%	94011.00	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%		0.00%	30474.00	0.15%	30479.00	0.15%	30479.00	0.15%	30479.00	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%		0.00%	58949.00	0.29%	58954.00	0.29%	58954.00	0.29%	57581.00	0.28%
7	BEACON MEDICARE LTD.	5058	AB Securities Limited	268471.00	1.32%	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.	CM489	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.	7053	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	NURUNNAHAR 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				2101577.00	10.32%	2175833.00	10.69%	2214463.00	10.88%	2169001.00	10.65%	2233195.00	10.97%	2103557.00	10.33%	2138380.00	10.50%	2195993.00	10.79%	2145993.00	10.54%	2036189.00	10.00%
Total No. of Outstanding Securities				20359760																			

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 - 3:

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....."

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

“ এক্সচেঞ্জে 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, এক্সচেঞ্জে 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 তাতাকে 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.

Contravention - 3:

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 NURUNNAHAR KARIM:

i. Individual Trade Patterns of NURUNNAHAR KARIM (Only Public Market):

Date	Code # 5674				Total					
	BO ID # 1203710075253110									
	NURUNNAHAR KARIM									
	AB Securities Limited									
Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total	
23-08-2022	4660	185.96	0	0.00	4660	185.96	866596.00	0	0.00	0.00
Total	4660		0		4660			0		

ii. Effects of 'ORIONINFU' at DSE by NURUNNAHAR 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						
23-08-2022	4660	185.96	866596.00	0	0.00	0.00	0	0.00	0.00	4660	185.96	866596.00	1076925	191.20	9.95%	0.43%	0.00%	0.43%
30-08-2022	44500	223.00	9923500.00	0	0.00	0.00	0	0.00	0.00	49160	219.49	10790096.00	1274144	265.50	8.72%	3.49%	0.00%	3.49%
Total	49160	219.49	10790096.00	0	0.00	0.00	0	0.00	0.00	49160	219.49	10790096.00						

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Summary of the trade by NURUNNAHAR 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
44500	223.00	9923500.00	0	0.00	0.00	49100	219.49	10790096.00	0	0.00	0.00	0.00	0.00	49100	219.49	10790096.00

iii. Gain/Loss by NURUNNAHAR KARIM from 21.06.2022 to 12.10.2022:

Realized Capital gain(loss)per unit	0.00	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	0.00%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	0.00	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	700.11	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	318.97%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	3,44,17,440.00	Quantity of Stock Position x Unrealized gain (loss) per unit

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. Nurunnahar Karim -কে মার্চ ২৭, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে Mrs. Nurunnahar Karim এর পক্ষে Mr. Mohiuddin Sheikh Jibon (on behalf) শুনানীতে উপস্থিত হয়ে মার্চ ২০, ২০২৩ তারিখের BPL/CA/BSEC/SHOWCAUSE-REPLY/2023/MAR/01 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 1 (one) nos Beneficial Owner account bearing No. 1203710075253110 maintaining with AB Securities Limited. 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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সেহেতু, Mrs. Nurunnahar Karim-এর উল্লিখিত নকল এবং উদত্ত প্রতিবেদন থেকে প্রতীয়মান হয় যে, তার বিনিয়োগ উপস্থাপিত আবেদনপত্রের সঠিক ও ইচ্ছাকৃত এবং উপযুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mrs. Nurunnahar Karim-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে গিনেচিত হয়নি;

সেহেতু, Mrs. Nurunnahar Karim উপর্যুক্ত কর্মকান্ডের মাধ্যমে Securities and Exchange Ordinance, 1969 এর Section 17(c)(v) ও Section 17 (c) (ii) এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন (উন্নয়নমূলক সংশোধন শেয়ার অর্জন, অধিগ্রহণ ও কর্তৃত্ব গ্রহণ) বিধিমালা, ২০১৮ এর বিধি ০৪(১) লংঘন করেছেন;

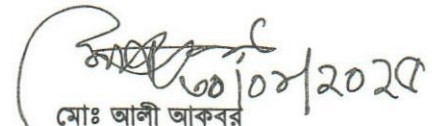
সেহেতু, Mrs. Nurunnahar Karim-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 এবং বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩ এর ধারা ১৮ অনুযায়ী শাস্তিযোগ্য অপরাধ;

সেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য Mrs. Nurunnahar 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. Nurunnahar Karim-কে মোট ১০.০০ (দশ) লক্ষ টাকা অর্থদণ্ডে দণ্ডিত করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। Mrs. Nurunnahar Karim
(BO ID # 1203710075253110)
House # 20, Road # 79, Gulshan-2, Dhaka.