

**Bangladesh Securities and Exchange Commission**  
Enforcement Division  
Enforcement Department  
Market, Market Intermediaries and Other Affairs Section  
[www.sec.gov.bd](http://www.sec.gov.bd)

নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/ ৬৪  
তারিখঃ জানুয়ারি ২৫, ২০২৬

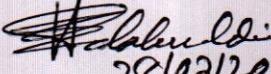
  
10/02/2026  
Mr. Niloy-AD

**The City Bank Limited**  
(BOID: 1204500000803683)  
City Bank Center  
136, Gulshan Avenue,  
Gulshan-2, Dhaka-1212.

**বিষয়: আদেশ।**

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৬৩ তারিখঃ জানুয়ারি ২৫, ২০২৬ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,

  
25/02/2026

মোঃ সুলতান সালাহ উদ্দিন  
উপপরিচালক (এনফোর্সমেন্ট)

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

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

**অবগতির জন্য অনুলিপি:**

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি (BSEC/Surveillance/2023-0097)।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৬৩

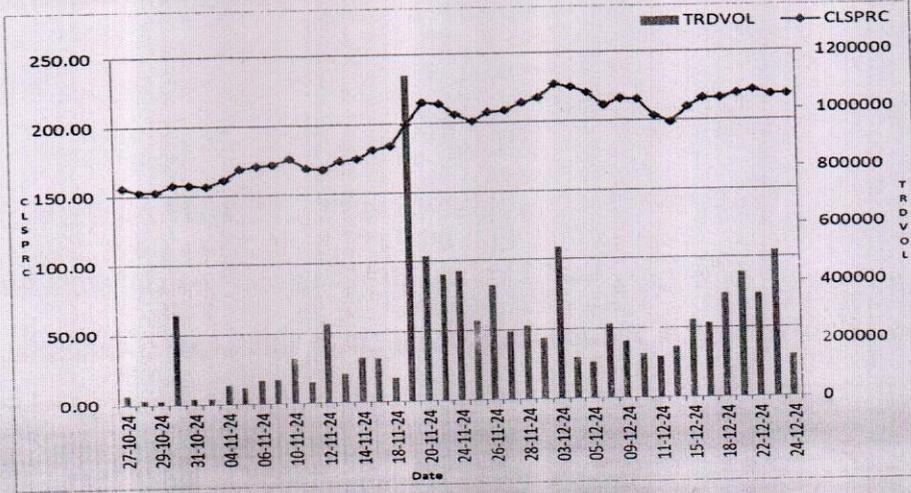
তারিখঃ জানুয়ারি ২৫, ২০২৬

**আদেশ**

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

যেহেতু, ডিসেম্বর ২৪, ২০২৪ তারিখের কমিশনের তদন্ত (investigation) আদেশ নং BSEC/Surveillance/2023-0097/403 দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড-এর একটি তদন্ত দল ২৮.১০.২০২৪ থেকে ২৪.১২.২০২৪ পর্যন্ত সময়ে Fine Foods Limited (FINEFOODS) এর শেয়ার লেনদেন সংক্রান্ত তদন্ত কার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। তদন্ত প্রতিবেদন থেকে অন্যান্যের নব্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

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



Yesterday Closing Price (YCP) of the share of FINEFOODS as on 28-10-2024 was Tk. 155.80 and closing price of the same was Tk. 218.60 as on 24-12-2024. During this period from 28-10-2024 to 24-12-2024, price of the share of FINEFOODS was increased by Tk. 62.80 which is approximately 40.31% higher compared to closing price of 27-10-2024.

**Observations and findings:**

**A. TRADE DETAILS OF THE CITY BANK LTD. AND ASSOCIATES:**

**Observation- 1:**

After analyzing documents, it is observed that The City Bank Ltd. (Client code # C082 of City Brokerage Limited) was the top buyer of FINEFOODS share from 28-10-2024 to 24-12-2024. It was observed that the aforesaid client was involved with the following accounts through which they traded shares of "FINEFOODS" during the investigation period.

As per letter reference CBL/HO/HR/2024/19 dated June 10, 2024 submitted by City Brokerage Limited that Md. Sanowar Khan is the "Portfolio manager, Capital Market" of The City Bank Limited since June 10, 2024.

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Details of the accounts associated with The City Bank Ltd. is given below:

BO ID	Client Code	Client Name	Name of TREC Holder	Top Buyer Ranking	Remarks
120450000803683	C082	THE CITY BANK LTD.	City Brokerage Limited	1st	Single Account
1604630060647405	FC1988	MD. SANOWAR KHAN	FAS Capital Management Limited	17th	Appointed Portfolio Manager for investment in Capital market of City Bank PLC with effect from June 10, 2024 by the bank.
1201820074929350	H049	MST. ASMAUL HUSNA	BRAC EPL Stock Brokerage Limited	8th	Wife of Mr. Md. Sanowar Khan
1604630073941167	FC2074	MD. ANWER PARVEZ KHAN	FAS Capital Management Limited		Brother of Mr. Md. Sanowar Khan
1201820076867468	H0530	SSS HOLDINGS LIMITED	BRAC EPL Stock Brokerage Limited	4th	Enterprise of Mr. Md. Sanowar Khan
1606190076868355	CL0139	SSS HOLDINGS LIMITED	Community Bank Investment Limited	10th	

**Individual Trade Patterns, Trade monitoring screenshots, Effects of "FINEFOODS" at DSE in public market by the said client and gain and loss statement of THE CITY BANK LTD. and associates are given below (as per DSE trade data):**

**I. Individual Trade Patterns of the City Bank Ltd. and associates (Only Public Market):**

Date	Code # C082				Code # FC1988				Code # H049				Code # FC2074				Code # H0530				Code # CL0139				Total											
	BO ID # 120450000803683				BO ID # 1604630060647405				BO ID # 1201820074929350				BO ID # 1604630073941167				BO ID # 1201820076867468				BO ID # 1606190076868355															
	THE CITY BANK LTD.				MD. SANOWAR KHAN				MST. ASMAUL HUSNA				Md. Anwer Parvez Khan				SSS HOLDINGS LIMITED				Community Bank Investment Limited															
	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty	Rate (W.Avg.)	Total	Sale Qty	Sale Rate (W.Avg.)	Total				
30-10-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	129000	154.60	0	0.00	119550	154.60	0	0.00	248550	154.60	0	0.00	38425475.00	0	0.00	0.00				
04-11-24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	13000	158.43	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	165.53	107157750.00	0	0.00	0.00			
12-11-24	647350	165.53	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	0	0.00	0	0.00	0	0.00	0	0.00	199630	168.30	33597780.00	0	0.00	0.00		
14-11-24	199630	168.30	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	20000	181.70	3634000.00	0.00		
17-11-24	0	0.00	0	0.00	50000	185.20	0	0.00	104363	186.30	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	0	0.00	0	0.00	0.00			
19-11-24	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00			
20-11-24	21090	214.07	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	62000	212.67	13183900.00	0	0.00	0.00
21-11-24	62000	212.67	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	22000	207.63	4567950.00	22539	208.30	4694553.80
24-11-24	0	0.00	4000	208.78	0	0.00	0	0.00	22000	207.63	18538	208.20	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	20000	204.25	4084940.70	19500	204.56	4009320.00
25-11-24	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
26-11-24	17000	209.13	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
27-11-24	60834	209.06	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
03-12-24	53014	225.21	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
08-12-24	119900	212.60	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
10-12-24	8516	214.89	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
12-12-24	35710	199.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
15-12-24	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
17-12-24	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
18-12-24	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
23-12-24	0	0.00	19010	212.05	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	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	
Total	1225044	43010	90000	65000	146363	47363	0	0	4000	239000	49000	119550	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		

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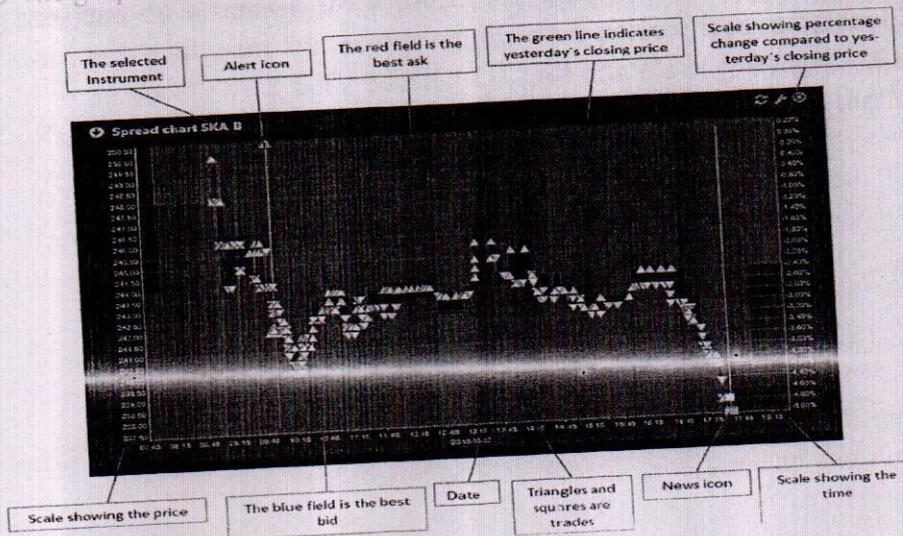
**II. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by The City Bank Ltd. and associates:**

Date	Buy				Sale			Cost of shares sold		Stock Position		Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Change d by	Client Buy (%)	Client Sale (%)	Client Trade (%)
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
30-10-24	248550	154.60	38425475.00	0	0.00	0.00	0.00	0.00	248550	154.60	38425475.00	309998	157.50	3.08%	80.18%	0.00%	80.18%
04-11-24	0	0.00	0.00	248550	156.60	38923214.40	154.60	38425475.00	0	0.00	0.00	305349	161.10	2.94%	0.00%	81.40%	81.40%
12-11-24	647350	165.53	107157750.00	0	0.00	0.00	0.00	0.00	647350	165.53	107157750.00	774406	168.00	-0.47%	83.59%	0.00%	83.59%
14-11-24	299630	168.20	50397780.00	0	0.00	0.00	0.00	0.00	946980	166.38	157555330.00	462703	175.10	0.75%	64.76%	0.00%	64.76%
17-11-24	4000	170.00	680000.00	42024	175.57	7378080.00	166.39	6992460.32	908956	166.39	151243069.68	179696	181.70	3.77%	2.23%	23.39%	25.61%
19-11-24	304363	185.01	56191742.00	30000	187.00	5610000.00	171.21	5136360.97	1183319	171.21	202598450.72	1598208	199.30	8.32%	19.04%	1.88%	20.92%
20-11-24	21090	214.07	4514796.00	0	0.00	0.00	0.00	0.00	1204409	171.96	207113246.72	591917	214.90	7.83%	3.56%	0.00%	3.56%
21-11-24	62000	212.67	13185300.00	0	0.00	0.00	0.00	0.00	1266409	173.96	220298546.72	491225	214.20	-0.33%	12.62%	0.00%	12.62%
24-11-24	22000	207.63	4567950.00	22539	208.30	4694953.80	174.53	3933739.96	1265870	174.53	220932756.76	444570	206.20	-3.73%	4.95%	5.07%	10.02%
25-11-24	20000	204.25	4084940.70	19600	204.56	4009320.00	174.99	3429854.39	1266270	174.99	221587843.06	358312	201.10	-2.47%	5.58%	5.47%	11.05%
26-11-24	17000	209.13	3555185.00	0	0.00	0.00	0.00	0.00	1283270	175.44	225143028.06	560254	207.70	3.28%	3.03%	0.00%	3.03%
27-11-24	60834	209.06	12718088.90	0	0.00	0.00	0.00	0.00	1344104	176.97	237861116.96	322214	209.00	0.63%	18.88%	0.00%	18.88%
28-11-24	0	0.00	0.00	44000	207.57	9133100.00	176.97	7786517.37	1300104	176.97	230074599.59	359872	214.00	2.39%	0.00%	12.23%	12.23%
02-12-24	0	0.00	0.00	33000	209.95	6928500.00	176.97	5839888.03	1267104	176.97	224234711.56	295443	217.50	1.64%	0.00%	11.17%	11.17%
03-12-24	53014	225.21	11939327.00	0	0.00	0.00	0.00	0.00	1320118	178.90	236174038.56	602105	227.20	4.46%	8.80%	0.00%	8.80%
04-12-24	40000	222.00	8880000.00	0	0.00	0.00	0.00	0.00	1360118	180.17	245054038.56	203491	224.80	-1.06%	19.66%	0.00%	19.66%
08-12-24	119900	212.60	25490740.00	0	0.00	0.00	0.00	0.00	1488534	182.98	272374806.56	175732	215.80	-0.14%	4.85%	0.00%	4.85%
10-12-24	8516	214.89	1830028.00	0	0.00	0.00	0.00	0.00	1318734	183.37	241820987.18	349373	198.40	-2.51%	10.22%	58.82%	69.04%
12-12-24	35710	199.70	7131287.00	205510	195.73	40224547.00	183.37	37685106.38	1310294	183.37	240273314.09	296257	209.90	5.80%	0.00%	2.85%	2.85%
15-12-24	0	0.00	0.00	8440	212.15	1790543.50	183.37	1547673.10	1310294	183.37	241820987.18	349373	198.40	-2.51%	10.22%	58.82%	69.04%
17-12-24	0	0.00	0.00	65423	213.58	13972775.30	183.37	11996850.35	1244871	183.37	228276463.74	330314	216.30	3.05%	0.00%	19.81%	19.81%
18-12-24	0	0.00	0.00	32851	219.77	7219624.20	183.37	6024005.79	1212020	183.37	222252457.95	405958	216.20	-0.05%	0.00%	8.09%	8.09%
23-12-24	0	0.00	0.00	19010	222.05	4221121.00	183.37	3485931.94	1193010	183.37	218766526.01	835356	218.30	-1.71%	0.00%	2.28%	2.28%
Total	1963957	178.75	351050389.60	770947	186.92	144105779.20	171.59	132283863.59	1193010	183.37	218766526.01						

**III. Trade monitoring screenshots of The City Bank Ltd. and Associates (public market):**

IED collected Trade monitoring screenshots from Surveillance Department on some trading date(s) where appearance of active trading of THE CITY BANK LTD. AND ASSOCIATES were observed which influenced the price of FINEFOODS.

The details of the graphs are given below:



*[Handwritten signature]*

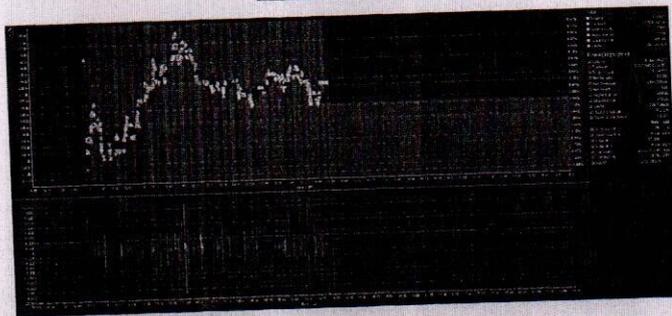
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- ▲ Green triangle represents trade of **FINEFOODS** by The City Bank Ltd. and Associates
- △ White triangle represents trade of **FINEFOODS** by other clients

After scrutinizing the trade monitoring screenshots collected from Surveillance Department, it is found that The City Bank Ltd. and associates were involved in trading of shares of FINEFOODS which influenced price of the said shares on several dates:

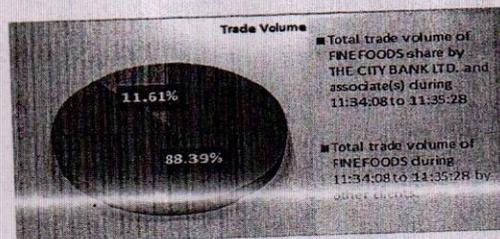
**BOIDs: 120450000803683, 1604630060647405, 1201820074929350, 1604630073941167, 1201820076867468, 1606190076868355 (Combined)**

26-11-2024



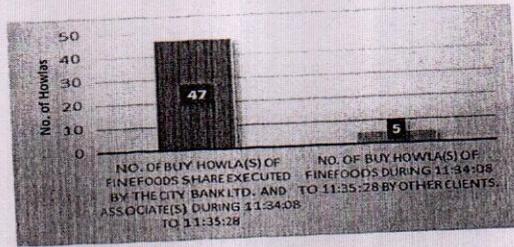
It was observed in the above graph that on 26-11-2024, total number of trades of FINEFOODS in the market was 2109, whereas number of trades (buy) executed by THE CITY BANK LTD. and associate(s) were 95 which is approximately 4.50% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 394,605 whereas buy volume by the said client(s) was 17,000 which is approximately 4.31% of the total traded volume in the market.

On 26-11-2024, trading of FINEFOODS share was started at Tk. 210.00 which is Tk. 8.90 more than the YCP of Tk. 201.10. On that day, THE CITY BANK LTD. and associate(s) started series of trading at 11:34:08 at price Tk. 208.20 and induced the same to rise to Tk. 209.80 up to 11:35:28. It can also be observed from the above graph that THE CITY BANK LTD. and associate(s) executed significant trades during this time period. It is mentionable here that from 11:34:08 to 11:35:28, THE CITY BANK LTD. and associate(s) bought 7,619 shares of FINEFOODS compared to the total traded share of 8,620. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, THE CITY BANK LTD. and associate(s) executed 47 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 52 as shown in the following Bar Chart.

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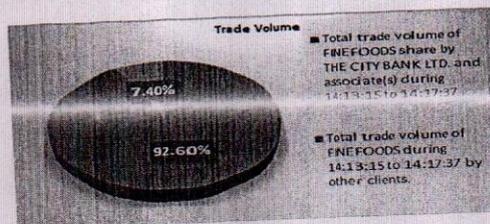
It is observed from the above graphs and screenshot that THE CITY BANK LTD. and associate(s) bought 88.39% of the total trades of FINEFOODS shares by executing 47 of total 52 howlas from 11:34:08 to 11:35:28 on 26-11-2024. From 11:34:08 to 11:35:28, THE CITY BANK LTD. and associate(s) induced the price to rise from Tk. 208.20 to Tk. 209.80 (induced the price by Tk. 1.60). Thus it seems that THE CITY BANK LTD. and associate(s) were actively trying to lift the price of FINEFOODS share.

**27-11-24**



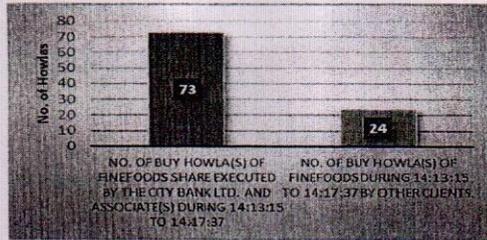
It was observed in the above graph that on 27-11-2024, total number of trades of FINEFOODS in the market was 1064, whereas number of trades (buy) executed by THE CITY BANK LTD. and associate(s) were 95 which is approximately 8.93% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 234,603 whereas buy volume by the said client(s) was 60,834 which is approximately 25.93% of the total traded volume in the market.

On 27-11-2024, trading of FINEFOODS share was started at Tk. 209.00 which is Tk. 1.30 more than the YCP of Tk. 207.70. On that day, THE CITY BANK LTD. and associate(s) started series of trading at 14:13:15 at price Tk. 207.90 and induced the same to rise to Tk. 209.90 up to 14:17:37. It can also be observed from the above graph that THE CITY BANK LTD. and associate(s) executed significant trades during this time period. It is mentionable here that from 14:13:15 to 14:17:37, THE CITY BANK LTD. and associate(s) bought 51,303 shares of FINEFOODS compared to the total traded share of 55,403. This is shown in the following Pie Chart.



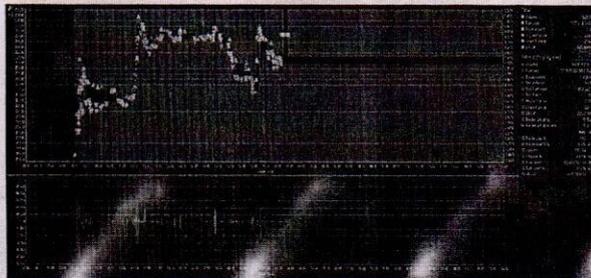
It is also found that during the aforementioned period, THE CITY BANK LTD. and associate(s) executed 73 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 97 as shown in the following Bar Chart.

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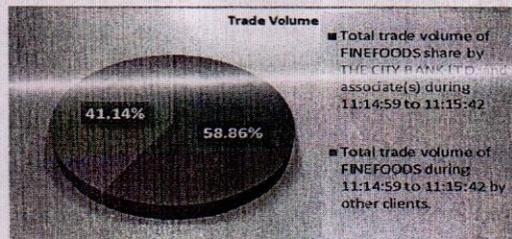
It is observed from the above graphs and screenshot that THE CITY BANK LTD. and associate(s) bought 92.60% of the total trades of FINEFOODS shares by executing 73 of total 97 howlas from 14:13:15 to 14:17:37 on 27-11-2024. From 14:13:15 to 14:17:37, THE CITY BANK LTD. and associate(s) induced the price to rise from Tk. 207.90 to Tk. 209.90 (induced the price by Tk. 2.00). Thus it seems that THE CITY BANK LTD. and associate(s) were actively trying to lift the price of FINEFOODS share.

03-12-24



It was observed in the above graph that on 03-12-2024, total number of trades of FINEFOODS in the market was 2043, whereas number of trades (buy) executed by THE CITY BANK LTD. and associate(s) were 113 which is approximately 5.53% of the total number of trades in the market. Again, total traded volume of FINEFOODS in the market on that day was 525,083 whereas buy volume by the said client(s) was 53,014 which is approximately 10.10% of the total traded volume in the market.

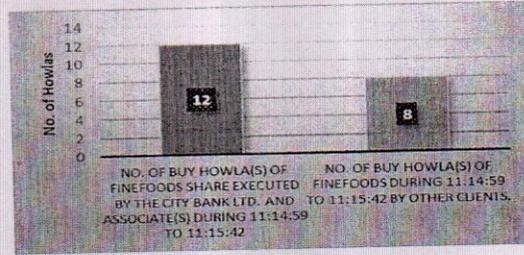
On 03-12-2024, trading of FINEFOODS share was started at Tk. 216.00 which is Tk. 1.50 less than the YCP of Tk. 217.50. On that day, THE CITY BANK LTD. and associate(s) started series of trading at 11:14:59 at price Tk. 222.00 and induced the same to rise to Tk. 223.00 up to 11:15:42. It can also be observed from the above graph that THE CITY BANK LTD. and associate(s) executed significant trades during this time period. It is mentionable here that from 11:14:59 to 11:15:42, THE CITY BANK LTD. and associate(s) bought 1,638 shares of FINEFOODS compared to the total traded share of 2,783. This is shown in the following Pie Chart.



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It is also found that during the aforementioned period, THE CITY BANK LTD. and associate(s) executed 12 howlas to purchase of shares of FINEFOODS compared to the total number of howlas of 20 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that THE CITY BANK LTD. and associate(s) bought 58.86% of the total trades of FINEFOODS shares by executing 12 of total 20 howlas from 11:14:59 to 11:15:42 on 03-12-2024. From 11:14:59 to 11:15:42, THE CITY BANK LTD. and associate(s) induced the price to rise from Tk. 222.00 to Tk. 223.00 (induced the price by Tk. 1.00). Thus it seems that THE CITY BANK LTD. and associate(s) were actively trying to lift the price of FINEFOODS share.

## I. Summary of the trade by The City Bank Ltd. and associate(s):

V	Block Buy		Block Sale		Total Buy			Total Sale			Cost of Shares Sold		Stock Position			
	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
100	183.06	26360000.00	562574	180.17	101359255.00	1,963,957.00	178.75	351050389.60	770,947.00	186.92	144105779.20	171.59	132283863.59	1193010	183.37	218766526.01

## II. Gain and Loss by The City Bank Ltd. and associate(s) from 28.10.2024 to 24.12.2024:

Realized Capital gain(loss)per unit	15.33	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	8.94%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	11,821,915.61	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	35.23	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	19.21%	Unrealized gain (loss) per unit / Average Price of Stock Position
Unrealized gain(loss) TK	42,025,459.99	Quantity of Stock Position x Unrealized gain (loss) per unit

As per DSE trade data, it was observed that THE CITY BANK LTD. and associate(s) bought 1963957 shares and sold 770947 shares of FINEFOODS from public market during the period from 28-10-2024 to 24-12-2024. With the said BO account(s), THE CITY BANK LTD. and associate(s) traded 20.36% shares of FINEFOODS and realized a capital gain of Tk. 11821915.61 from the trading of FINEFOODS share during the investigation period. The said client(s) had also unrealized gain of TK. 42025459.99 during the period.

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**Finding-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-  
.....

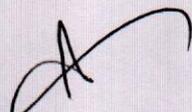
(v) directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of including its purchase by others or depressing its price for the purpose of inducing its sale by others;"

It is evident that THE CITY BANK LTD. and associate(s) were involved directly and indirectly in a series of transactions of **FINEFOODS** share with his aforesaid BO accounts in order to create the appearance of active trading and raising of price of the said share.

**Contravention-1:**

THE CITY BANK LTD and its 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 "FINEFOODS" shares creating the appearance of active trading therein and raising price of the said share.



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## Observation-2:

After analyzing the trade pattern of the clients, the investigation team found that THE CITY BANK LTD. (BOID# 1204500000803683) and associates were involved in trading of shares of "FINEFOODS" within the investigation period and these accounts are acting as counter party of each other for 4000 shares of "FINEFOODS" on 17-11-2024 in 1 howla in the block market.

Details of the above mentioned trades are as follows:

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
17-11-24	13:47:59	343289236	FINEFOODS	4000	170	DSEGRA	FC2074	1604630073941167 Md. Anwer Parvez Khan	DSECBL	C082	1204500000803683 THE CITY BANK LTD	Block

## Finding-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 securities; .....

It is found that THE CITY BANK LTD. and associates acted as counter party of each other for 4000 shares of FINEFOODS on 17-11-2024 in 1 howla in the block market.

## Contravention-2:

THE CITY BANK LTD. (BOID# 1204500000803683) and Md. Anwer Parvez Khan (BOID# 1604630073941167) have violated the following:

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

## INDIVIDUAL TRADE PATTERN OF THE CITY BANK LTD.:

### i. Individual Trade Patterns of THE CITY BANK LTD. (Only Public Market):

Date	Code # C082				Total					
	BO ID # 1204500000803683									
	THE CITY BANK LTD.									
	City Brokerage 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
12-11-24	647350	165.53	0	0.00	647350	165.53	107157750.00	0	0.00	0.00
14-11-24	199630	168.30	0	0.00	199630	168.30	33597780.00	0	0.00	0.00
17-11-24	0	0.00	20000	181.70	0	0.00	0.00	20000	181.70	3634000.00
20-11-24	21090	214.07	0	0.00	21090	214.07	4514796.00	0	0.00	0.00
21-11-24	62000	212.67	0	0.00	62000	212.67	13185300.00	0	0.00	0.00
24-11-24	0	0.00	4000	208.78	0	0.00	0.00	4000	208.78	835134.00
26-11-24	17000	209.13	0	0.00	17000	209.13	3555185.00	0	0.00	0.00
27-11-24	60834	209.06	0	0.00	60834	209.06	12718088.90	0	0.00	0.00
03-12-24	53014	225.21	0	0.00	53014	225.21	11939327.00	0	0.00	0.00
08-12-24	119900	212.60	0	0.00	119900	212.60	25490740.00	0	0.00	0.00
10-12-24	8516	214.89	0	0.00	8516	214.89	1830028.00	0	0.00	0.00
12-12-24	35710	199.70	0	0.00	35710	199.70	7131287.00	0	0.00	0.00
23-12-24	0	0.00	19010	222.05	0	0.00	0.00	19010	222.05	4221121.00
<b>Total</b>	<b>1225044</b>		<b>43010</b>		<b>1225044</b>			<b>43010</b>		

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## ii. Effects of "FINEFOODS" at DSE (both Public Market and Block Market) by THE CITY BANK LTD.:

Date	Buy			Sale			Cost of shares sold			Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Change by	Client Buy (%)	Client Sale (%)	Client Trade (%)	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
12-11-24	647350	165.53	107157750.00	0	0.00	0.00	0.00	0.00	647350	165.53	107157750.00	774406	168.00	-0.47%	83.59%	0.00%	83.59%	
14-11-24	299630	168.20	50397780.00	0	0.00	0.00	0.00	0.00	946980	166.38	157555530.00	462703	175.10	0.75%	64.76%	0.00%	64.76%	
17-11-24	0	0.00	0.00	42024	175.57	7378080.00	166.38	6991819.88	904956	166.38	150563710.12	179696	181.70	3.77%	0.00%	23.39%	23.39%	
19-11-24	0	0.00	0.00	30000	187.00	5610000.00	166.38	4991304.89	874956	166.38	145572405.23	1598208	199.30	8.32%	0.00%	1.88%	1.88%	
20-11-24	21090	214.07	4514796.00	0	0.00	0.00	0.00	0.00	896046	167.50	150087201.23	591917	214.90	7.83%	3.56%	0.00%	3.56%	
21-11-24	62000	212.67	13185300.00	0	0.00	0.00	0.00	0.00	958046	170.42	163272501.23	491225	214.20	-0.33%	12.62%	0.00%	12.62%	
24-11-24	0	0.00	0.00	4000	208.78	835134.00	170.42	681689.61	954046	170.42	162590811.62	444570	206.20	-3.73%	0.00%	0.90%	0.90%	
26-11-24	17000	209.13	3555185.00	0	0.00	0.00	0.00	0.00	971046	171.10	166145996.62	560254	207.70	3.28%	3.03%	0.00%	3.03%	
27-11-24	60834	209.06	12718088.90	0	0.00	0.00	0.00	0.00	1031880	173.34	178864085.52	322214	209.00	0.63%	18.88%	0.00%	18.88%	
28-11-24	0	0.00	0.00	44000	207.57	9133100.00	173.34	7626874.99	987880	173.34	171237210.53	359872	214.00	2.39%	0.00%	12.23%	12.23%	
02-12-24	0	0.00	0.00	33000	209.95	6928500.00	173.34	5720156.24	954880	173.34	165517054.29	295443	217.50	1.64%	0.00%	11.17%	11.17%	
03-12-24	53014	225.21	11939327.00	0	0.00	0.00	0.00	0.00	1007894	176.07	177456381.29	602105	227.20	4.46%	8.80%	0.00%	8.80%	
04-12-24	40000	222.00	8880000.00	0	0.00	0.00	0.00	0.00	1047894	177.82	186336381.29	203491	224.80	-1.06%	19.66%	0.00%	19.66%	
08-12-24	119900	212.60	25490740.00	0	0.00	0.00	0.00	0.00	1167794	181.39	211827121.29	262319	211.70	-4.25%	45.71%	0.00%	45.71%	
10-12-24	8516	214.89	1830028.00	0	0.00	0.00	0.00	0.00	1176310	181.63	213657149.29	175732	215.80	-0.14%	4.85%	0.00%	4.85%	
2-12-24	35710	199.70	7131287.00	0	0.00	0.00	0.00	0.00	1212020	182.17	220788436.29	349373	198.40	-2.51%	10.22%	0.00%	10.22%	
03-12-24	0	0.00	0.00	19010	222.05	4221121.00	182.17	3462969.40	1193010	182.17	217325466.89	835356	218.30	-1.71%	0.00%	2.28%	2.28%	
<b>Total</b>	<b>1365044</b>	<b>180.80</b>	<b>246800281.90</b>	<b>172034</b>	<b>198.25</b>	<b>34105935.00</b>	<b>171.33</b>	<b>29474815.01</b>	<b>1193010</b>	<b>182.17</b>	<b>217325466.89</b>							

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**iii. Summary of the trade by THE CITY BANK LTD.:**

Summary																
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
140000	183.43	25680000.00	129024	196.98	25415680.00	1,365,044.00	180.80	246800281.90	172,034.00	198.25	34105935.00	171.33	29474815.01	1193010	182.17	217325466.89

**iv. Gain and Loss by THE CITY BANK LTD. from 28.10.2024 to 24.12.2024**

Realized Capital gain(loss)per unit	26.92	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	15.71%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	4,631,119.99	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (24-12-2024)	218.60	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	36.43	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	20.00%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	43,466,519.11	Quantity of Stock Positon x Unrealized gain (loss) per unit



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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক আগস্ট ০৬, ২০২৫ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৭০১(২)/২০২৪/৮৮৬ স্মারকমূলে City Bank Ltd. and Associates (associates are Md. Sanowar Khan, Mst. Asmaul Husna, Md. Anwer Parvez Khan and SSS Holdings Limited)-কে আগস্ট ১৮, ২০২৫ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে নির্ধারিত সেপ্টেম্বর ১০, ২০২৫ তারিখে শুনানীতে City Bank Ltd. এর পক্ষে Mr. Md. Shah Alam, SEVP and Mr. Mohammad Shahazadul Alam Khan, SAVP (on behalf) উপস্থিত হয়ে সেপ্টেম্বর ০৯, ২০২৫ তারিখের পত্র নং CBPLC/HO/TRY/2025/110 এর মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

*“City Bank's capital market portfolio was formerly managed by City Bank Capital Resources Limited (CBCRL), a wholly owned subsidiary of City Bank. Subsequently, Mr. Md Sanowar Khan was appointed as the capital market Fund Manager, effective June 10, 2024 given his experience in the capital market investment and analytical ability (see Attachment 1). He was granted the authority to oversee stock market trading activities, making him solely responsible for share trading and the securities analysis process.*

*In response to your query, we wish to present our reply for your consideration.*

### Contravention 1:

*“The City Bank Ltd (BO ID #1204500000803683) and its associates have violated the followings:*

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

*The buy and sell information of City Bank's investment in FINEFOODS (Fine Foods Limited) is furnished below:*

Date	Buy		Sell		Remark
	Number of Unit Share	Weighted average Price	Number of Unit Share	Weighted average Price	
12-Nov-24	497,350	165.00	-	-	Regular Market
12-Nov-24	150,000	167.30	-	-	Regular Market
14-Nov-24	199,630	168.30	-	-	Block Trade
14-Nov-24	100,000	168.00	-	-	Regular Market
17-Nov-24	-	-	42,024.00	175.57	Regular Market
19-Nov-24	-	-	30,000.00	187.00	Regular Market
20-Nov-24	21,090	214.07	-	-	Regular Market
21-Nov-24	62,000	212.67	-	-	Regular Market
24-Nov-24	-	-	4,000.00	208.78	Regular Market
26-Nov-24	17,000	209.13	-	-	Regular Market
27-Nov-24	60,834	209.06	-	-	Regular Market
28-Nov-24	-	-	44,000.00	207.57	Block Trade
02-Dec-24	-	-	33,000.00	209.95	Regular Market
03-Dec-24	53,014	225.21	-	-	Regular Market
04-Dec-24	40,000	222.00	-	-	Regular Market
08-Dec-24	119,900	212.60	-	-	Regular Market
10-Dec-24	8,516	214.89	-	-	Regular Market
12-Dec-24	35,710	199.70	-	-	Regular Market
23-Dec-24	-	-	19,010.00	222.05	Regular Market

Table 1: Bank's trading list on FINEFOODS.

**Bangladesh Securities and Exchange Commission**  
Enforcement Division  
Enforcement Department  
Market, Market Intermediaries and Other Affairs Section  
www.sec.gov.bd

The trading activities conducted by the Fund Manager for The City Bank Ltd (BO ID #120450000803683) were executed based on his analysis, discretion, and judgment. These transactions were done by Fund Manager based on authority delegated (attachment-2) to him and in compliance with the bank's policies and procedures that govern capital market investments (attachment-3). The bank has implemented a monitoring system to oversee trading activities, assess portfolio performance and identify any suspicious incidents, all of which are integral components of its enhanced due diligence initiatives.

On November 14, 2024 and November 28, 2024, the bank flagged block transactions executed by the fund manager prompting the submission of justifications for these discretionary trading decisions. Additionally, the bank raised concern regarding same-day buy-sell transactions carried out by him (attachment-4). In both instances, the Fund Manager provided explanations for the trades in question.

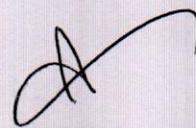
It is important to note that Mr. Md Sanowar Khan did not disclose to City Bank the trading activities conducted in his personal capacity or those of his relatives. The Bank only became aware of these trading activities due to the observations made by the Commission in the show-cause notice dated 06.08.2025. Furthermore, the monitoring of independent trading activities whether it is individual or institutional falls outside the scope of the bank's capital market portfolio oversight. City bank PLC had zero knowledge of or influence over the FINEFOODS trades in his or his related accounts. Thereby, we will request esteemed commission to consider the fact that if bank knew about those trades, bank would not have allowed the personal trades that Fund Manager did in his personal or associate accounts.

We would want to bring kind attention of commission to the fact that the bank's realized gain was only BDT 4,631,119.99. On the contrary Fund Manager Md Sanowar Khan, Asmaul Husna (wife of Fund Manager), Anwer Parvez khan (brother of Fund Manager) and SSS Holdings Limited (enterprise of Fund Manager) collectively had a realized gain of BDT 5,749,736.5. Bank had no information about these trades related to Fund Manager and his associates.

We would also want to address the fact that out of all the transactions under consideration 43.79% trades were done by Fund Manager and his related accounts. Unfortunately, bank did not have access to this information otherwise bank would have taken action against his personal trades.

Client name	Total Buy	Total Sell	Remaining position	Total Buy and Sell Volume	Percentage of total buy and sell volume
The City Bank Limited	13,65,044	1,72,034	11,93,010	15,37,078	56.2%
Md. Sanwar Khan	90,000	90,000	-	1,80,000	6.6%
Mst Asmaul Husna	1,46,363	1,46,363	-	2,92,726	10.7%
Md. Anwer Parvez Khan	4,000	4,000	-	8,000	0.3%
SSS Holdings Limited	3,58,550	3,58,550	-	7,17,100	26.2%
<b>Total</b>	<b>19,63,957</b>	<b>7,70,947</b>	<b>11,93,010</b>	<b>27,34,904</b>	<b>100.0%</b>

Table 2: Total FINEFOODS bought and sold by relevant accounts.



# Bangladesh Securities and Exchange Commission

Enforcement Division  
Enforcement Department  
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*Given the measures undertaken by the bank to monitor capital market trading activities, as evidenced by the flags raised, and in light of the absence of any disclosures by Fund Manager related to his personal or associated person trading activities, we firmly assert that Bank has not breached Section 17 (e)(v) of the Securities and Exchange Ordinance, 1969.*

## **Contravention 2:**

*"The City Bank Ltd. (BOID# 120450000803683) and Md. Anwer Parvez Khan (BOID#1604630073941167) have violated the following:*

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

*Mr. Md Sanowar Khan has been serving as the Fund Manager for the Capital Market since June 10, 2024. All transactions associated with City Bank BO ID# 120450000803683 have been executed under his discretion and judgment.*

*Commission has found that for 4,000 shares The City Bank Limited and Md Anwer Parvez Khan (brother of Fund Manager) were counterparties. We would like to state that transaction decisions were made by Fund Manager and city bank did not know of these counterparty transactions were happening. It is crucial to note that Md. Anwer Parvez Khan is not associated with the Bank. Furthermore, there has been no disclosure to the bank regarding any personal or associated person trading activities that could be linked to the transactions in question, which reinforces the argument that the bank has acted within its regulatory obligations.*

*In light of these circumstances, we request commission to consider that City Bank has not violated Section 17 (e)(ii) of the Securities and Exchange Ordinance, 1969, as it has not engaged in trades that would create a misleading appearance of active trading in securities.*

*After receiving recent BSEC enquiry letters, the bank issued show-cause letter to the Fund Manager and subsequently he has provided explanation. Additionally, the bank immediately removed Mr. Md Sanowar Khan from the capital market Fund Manager position, effective from August 19, 2025 (attachment-6). The bank has also initiated an internal enquiry through disciplinary proceeding against Mr. Md. Sanowar Khan, which is currently ongoing. Bank has also reviewed Investment Policy to introduce further rigid & ethical parameters on personal or associated trading activities (attachment-7). We also express to esteemed commission our intention to be more careful in conducting bank trades so that trades do not violate BSEC regulations."*



**Bangladesh Securities and Exchange Commission**

Enforcement Division  
Enforcement Department  
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যেহেতু, City Bank Ltd.-এর উল্লিখিত বক্তব্য এবং তদন্ত প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকান্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নেরও পরিপন্থী, সেহেতু এক্ষেত্রে City Bank Ltd.-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, City Bank Ltd.-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) এবং Section 17(e)(ii) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

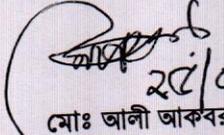
যেহেতু, City Bank Ltd.-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন ও বিধি-বিধান পরিপালনে আলোচ্য ব্যর্থতার জন্য, পুঁজিবাজারের শৃংখলা, স্বচ্ছতা এবং জনস্বার্থে আলোচ্য City Bank Ltd.-কে জরিমানা করা প্রয়োজন ও সমীচীন;

অতএব, সেহেতু, কমিশন উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর Section 22 [যা The Securities and Exchange (Amendment) Act, 2000 দ্বারা সংশোধিত] এ প্রদত্ত ক্ষমতাবলে-

- City Bank Ltd.-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে ৪১.০০ (একচল্লিশ) লক্ষ টাকা এবং Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) লঙ্ঘনের দায়ে ১.০০ (এক) লক্ষ টাকা [সর্বমোট ৪২ (বেয়াল্লিশ) লক্ষ টাকা] অর্থদন্ড ধার্য করল এবং তা ব্যক্তিগত দায় হিসেবে পরিশোধ করতে হবে। উক্ত অর্থদন্ড 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,

  
২৫/০১/২০২৫  
মোঃ আলী আকবর  
কমিশনার

বিতরণ:

- ১। The City Bank Limited  
(BOID: 1204500000803683)  
City Bank Center  
136, Gulshan Avenue,  
Gulshan-2, Dhaka-1212.

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