bs-GmBwm/Gb‡dvm‡g›U/2023/2013/674 ZwiLt 10 b‡f¤i 2014 Bs

dv÷ wmwKDwiwUR mwf‡mm wjwg‡UW
166-167 Avj ivRx Kg‡cø·, mCU- 702, 703, weRq bMi, civbv cëb XvKv-1000|
‡dvb bs- 9585325, 9585326

welq: Av‡`k|

Kwgk‡bi 10 b‡f¤i 2014 Bs Zwi‡Li Av‡`k bs-GmBwm/Gb‡dvm‡g›U/2023/2013/675 Gi mZ¨wqZ Abywjwc Avcbvi AeMwZ I c‡qvRbxq e¨e¯v Mn‡bi Rb¨ GZ`ms‡M msh³ Kiv n‡jv|

evsjv‡`k wmwKDwiwUR A¨vÛ G·‡PÄ Kwgk‡bi c‡¶

†gvnv¤§` †nv‡mb Lvb
Dc-cwiPvjK

<u>weZibt</u>

cavb wbevnx KgKZv, XvKv óK G·‡PÄ wjwg‡UW

cavb wbevnx KgKZv, PÆMvg óK G·‡PÄ wjwg‡UW

<u>AeMwZi Rb¨ Abywjwc:</u>

1| wbevnx cwiPvjK, AvBb, weGmBwm
2| wbevnx cwiPvjK, GgAvBGm, weGmBwm
3| wbevnx cwiPvjK, mv‡fBj¨vÝ, weGmBwm
4| †Pqvig¨vb g‡nv`‡qi `ßi, weGmBwm

bs-GmBwm/Gb‡dvm©‡g›U/2023/2013/675 ZvwiLt 10 b‡f¤^i 2014 Bs

Av‡`k

‡h‡nZ, Kwgkb Gi Av‡`k bs BSEC/Surveillance/2011-0754/27 dated September 15, 2013 Gi gva¨‡g GKwU Z`šÍ KwgwU MwVZ nq Ges D³ Z`šÍ KwgwUi `vwLjK…Z cÖwZ‡e`b Abhvqx findings and contraventions wbgœiƒc:

"**Quote**

Trading pattern in connection with the shares of Bangas

After analyzing the trading pattern of selected clients, some are found unusual and suspicious. They had exercised dominant role by trading larger percentages of total market trading of shares of Bangas. Through these activities some of them also realized significant profit during the period of March 3, 2013 to September 12, 2013. Details are delineated below:

It has been found that Kazi Saifur Rahman (Code # B0589), a client of LankaBangla Securities Ltd, bought 9,600 shares and sold 9,400 shares of BANGAS during the period from 12.05.2013 to 28.07.2013, which is almost 7.28% of total trade volume of BANGAS at DSE in those trading days in which the client traded. Realized gain of Kazi Saifur Rahman is 50.09%. Particulars and trade details are shown in the following table:

Brokerage Company: LankaBangla Securities Ltd.
Name of the client: Kazi Saifur Rahman
BO ID: 1204030007817574**, Client code:** B0589**, Instrument:** Bangas

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value		Trade volume		
								DSE	Kazi Saifur Rahman	Client Contribution
12-May-13	7,600	328.08	2,493,408			-		46,519	7,600	**16.34%**
10-Jun-13			-	2,400	424.91	1,019,784		27,250	2,400	**8.81%**
26-Jun-13	500	433.54	216,770			-		36,452	500	1.37%
21-Jul-13	1,500	589.00	883,500			-		43,750	1,500	3.43%
28-Jul-13			-	7,000	608.78	4,261,460		106,961	7,000	**6.54%**
Total	**9,600**	**374.34**	**3,593,678**	**9,400**	**561.83**	**5,281,244**		**260,932**	**19,000**	**7.28%**
Realized profit						**1,762,434**				
Realized gain (%)						**50.09%**				

First Securities Services Limited (Code # B1447), a client of LankaBangla Securities Ltd, bought 19,900 shares and sold 62,450 shares of BANGAS during the period from 08.04.2013 to 26.05.2013, which is almost 11.25% of total trade volume of BANGAS at DSE in those trading days in which the client traded. Realized gain of the client is 18.53%. Particulars and trade details are shown in the following table:

Brokerage Company: Lanka Bangla Securities Ltd.
Name of the client: First Securities Services Limited (FSSL)
BO ID: 1204030044806800**, Client code:** B1447**, Instrument:** Bangas

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value		Trade volume		
								DSE	FSSL	Client Contribution
8-Apr-13	7,500	191.35	**1,435,125**			**-**		84,888	7,500	**8.84%**
15-Apr-13	200	236.50	**47,300**			**-**		53,159	200	0.38%
16-Apr-13	2,500	242.00	**605,000**			**-**		57,357	2,500	4.36%
21-Apr-13			**-**	1,600	299.31	**478,896**		87,321	1,600	1.83%
22-Apr-13			**-**	23,000	290.18	**6,674,140**		74,267	23,000	**30.97%**
23-Apr-13			**-**	10,000	308.40	**3,084,000**		41,087	10,000	**24.34%**
24-Apr-13			**-**	5,500	334.02	**1,837,110**		54,411	5,500	**10.11%**
25-Apr-13			**-**	12,650	326.38	**4,128,707**		53,364	12,650	**23.71%**
8-May-13	5,000	324.10	**1,620,500**			**-**		44,297	5,000	**11.29%**
9-May-13	1,700	325.79	**553,843**			**-**		23,191	1,700	7.33%
15-May-13	3,000	343.54	**1,030,620**			**-**		93,487	3,000	3.21%
21-May-13			**-**	3,400	353.83	**1,203,022**		21,314	3,400	**15.95%**
22-May-13			**-**	4,200	358.97	**1,507,674**		19,836	4,200	**21.17%**
26-May-13			**-**	2,100	368.09	**772,989**		24,055	2,100	8.73%
Total	**19,900**	**265.95**	**5,292,388**	**62,450**	**315.24**	**19,686,538**		**732,034**	**82,350**	**11.25%**
Realized profit						**980,824**				
Realized gain (%)						**18.53%**				

Heritage Capital Management Limited (Code # B1582), a client of LankaBangla Securities Ltd, bought 69,900 shares and sold 67,000 shares of BANGAS during the period from 08.04.2013 to 28.07.2013, which is almost 11.26% of total trade volume of BANGAS at DSE in those trading days in which the client traded. The client contributed significant percentage of total traded volume of BANGAS at DSE in some trading days. Realized gain of the client is 36.26%. Particulars and trade details are shown in the following table:

Brokerage Company: LankaBangla Securities Ltd

Name of the client: Heritage Capital Management Ltd.

BO ID: 1204030048274120**, Client code:** B1582**, Instrument:** Bangas

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume		
							DSE	Heritage Capital Management Ltd.	Client Contribution
8-Apr-13	4,900	198.49	972,601			-	84,888	4,900	5.77%
9-Apr-13	20,300	219.08	4,447,324			-	89,200	20,300	**22.76%**
10-Apr-13	10,000	229.32	2,293,200			-	70,679	10,000	**14.15%**
11-Apr-13	2,000	216.95	433,900			-	53,759	2,000	3.72%
15-Apr-13	5,000	235.12	1,175,600			-	53,159	5,000	**9.41%**
16-Apr-13	9,000	240.62	2,165,580			-	57,357	9,000	**15.69%**
21-Apr-13			-	1,350	301.72	407,322	87,321	1,350	1.55%
22-Apr-13			-	16,550	289.73	4,795,032	74,267	16,550	**22.28%**

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume		
							DSE	Heritage Capital Management Ltd.	Client Contribution
23-Apr-13			-	3,000	308.40	925,200	41,087	3,000	7.30%
24-Apr-13			-	7,750	333.38	2,583,695	54,411	7,750	**14.24%**
25-Apr-13			-	11,050	328.19	3,626,500	53,364	11,050	**20.71%**
28-Apr-13			-	7,400	324.36	2,400,264	37,112	**7,400**	**19.94%**
29-Apr-13			-	1,200	339.72	407,664	54,615	**1,200**	2.20%
12-May-13	13,000	328.07	4,264,910			-	46,519	**13,000**	**27.95%**
13-May-13	4,000	326.65	1,306,600			-	33,572	**4,000**	**11.91%**
28-May-13			-	5,100	394.88	2,013,888	46,698	**5,100**	**10.92%**
29-May-13			-	3,700	416.26	1,540,162	50,127	**3,700**	7.38%
30-May-13			-	4,300	438.05	1,883,615	41,457	**4,300**	**10.37%**
10-Jun-13			-	3,700	425.17	1,573,129	27,250	**3,700**	**13.58%**
13-Jun-13			-	200	426.40	85,280	35,060	**200**	0.57%
23-Jun-13	1,700	438.30	745,110			-	16,820	**1,700**	**10.11%**
28-Jul-13			-	1,700	595.22	1,011,874	106,961	**1,700**	1.59%
Total	**69,900**	**254.72**	17,804,825	**67,000**	**347.07**	23,253,624	**1,215,683**	**136,900**	**11.26%**

Realized profit	6,187,483
Realized gain (%)	36.26%

Heritage Capital Management Limited (Code # 6353), a client of DBL Securities Limited, bought 22,500 shares and sold 22,500 shares of BANGAS during the period from 08.05.2013 to 28.07.2013, which is almost 10.25% of total trade volume of BANGAS at DSE in those trading days in which the client traded. The client contributed significant percentage of total traded volume of BANGAS at DSE in some trading days. Realized gain of the client is 69.82%. Particulars and trade details are shown in the following table:

Brokerage Company: DBL Securities Limited
Name of the client: Heritage Capital Management Limited
BO ID: 1201630048438095, **Client code:** 6353, **Instrument:** Bangas

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value		Trade volume		
								DSE	Heritage Capital Management Limited	Client Contribution
8-May-13	10,000	324.21	3,242,100			**-**		44,297	10,000	**22.57%**
9-May-13	6,000	327.90	1,967,400			**-**		23,191	6,000	**25.87%**
12-May-13	2,250	328.20	738,450			**-**		46,519	2,250	4.84%

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume		
							DSE	Heritage Capital Management Limited	Client Contribution
13-May-13	1,000	326.78	326,780			**-**	33,572	1,000	2.98%
14-May-13	3,250	321.89	1,046,143			**-**	34,319	3,250	**9.47%**
9-Jun-13			-	3,150	420.84	**1,325,646**	18,950	3,150	**16.62%**
17-Jun-13			-	1,000	431.45	**431,450**	25,980	1,000	3.85%
23-Jul-13			-	500	508.70	**254,350**	24,150	500	2.07%
24-Jul-13			-	850	490.81	**417,189**	25,615	850	3.32%
25-Jul-13			-	15,000	586.90	**8,803,500**	55,311	15,000	**27.12%**
28-Jul-13			-	2,000	600.00	**1,200,000**	106,961	2,000	1.87%
Total	**22,500**	**325.37**	7,320,873	**22,500**	**552.54**	**12,432,135**	**438,865**	**45,000**	**10.25%**
Realized profit						**5,111,262**			
Realized gain (%)						**69.82%**			

Kazi Saifur Rahman and Related Group (04 BO IDs)

It has been observed that there is relationship among the above-mentioned four client codes. Relationship details are shown in the table below:

Client Code	Name of Client	Name of Member Company	Remarks
B0589	Kazi Saifur Rahman	LankaBangla Securities Ltd	**Own Account of Kazi Saifur Rahman**
B1447	First Securities Services Limited (FSSL)	LankaBangla Securities Ltd	**Kazi Saifur Rahman is the CEO of FSSL**
B1582	Heritage Capital Management Ltd.	LankaBangla Securities Ltd	Mst. Shahana Tasmin Lopa (**Wife of Kazi Saifur Rahman)** is the Vice Chairman and authorized signatory of Heritage Capital Management Limited
6353	Heritage Capital Management Ltd.	DBL Securities Limited	Mst. Shahana Tasmin Lopa (**Wife of Kazi Saifur Rahman)** is the Vice Chairman and authorized signatory of Heritage Capital Management Limited

Collectively, Kazi Saifur Rahman, First Securities Services Limited and Heritage Capital Management Limited bought 1,21,900 shares and sold 1,61,350 shares of BANGAS during the period from 08.04.2013 to 28.07.2013, which is almost 16.60% of total trade volume of BANGAS at DSE in those trading days in which the clients traded. They contributed significant percentage of total traded volume of BANGAS at DSE in some trading days. Their collective realized gain is 42.30%. Particulars and trade details are shown in the following table:

Date	Buy Qty	Sale Qty	Trade volume (Bangas)		
			DSE	Kazi Saifur & related group	Contribution to Total Trade Volume
8-Apr-13	12,400	-	84,888	12,400	**14.61%**
9-Apr-13	20,300	-	89,200	20,300	**22.76%**
10-Apr-13	10,000	-	70,679	10,000	**14.15%**
11-Apr-13	2,000	-	53,759	2,000	3.72%
15-Apr-13	5,200	-	53,159	5,200	9.78%
16-Apr-13	11,500	-	57,357	11,500	**20.05%**
21-Apr-13	-	2,950	87,321	2,950	3.38%
22-Apr-13	-	39,550	74,267	39,550	**53.25%**
23-Apr-13	-	13,000	41,087	13,000	**31.64%**
24-Apr-13	-	13,250	54,411	13,250	**24.35%**
25-Apr-13	-	23,700	53,364	23,700	**44.41%**
28-Apr-13	-	7,400	37,112	7,400	**19.94%**
29-Apr-13	-	1,200	54,615	1,200	2.20%
8-May-13	15,000	-	44,297	15,000	**33.86%**
9-May-13	7,700	-	23,191	7,700	**33.20%**
12-May-13	22,850	-	46,519	22,850	**49.12%**
13-May-13	5,000	-	33,572	5,000	**14.89%**
14-May-13	3,250	-	34,319	3,250	9.47%
15-May-13	3,000	-	93,487	3,000	3.21%
21-May-13	-	3,400	21,314	3,400	**15.95%**
22-May-13	-	4,200	19,836	4,200	**21.17%**
26-May-13	-	2,100	24,055	2,100	8.73%
28-May-13	-	5,100	46,698	5,100	**10.92%**
29-May-13	-	3,700	50,127	3,700	7.38%
30-May-13	-	4,300	41,457	4,300	**10.37%**
9-Jun-13	-	3,150	18,950	3,150	**16.62%**
10-Jun-13	-	6,100	27,250	6,100	**22.39%**
13-Jun-13	-	200	35,060	200	0.57%
17-Jun-13	-	1,000	25,980	1,000	3.85%
23-Jun-13	1,700	-	16,820	1,700	**10.11%**
26-Jun-13	500	-	36,452	500	1.37%
21-Jul-13	1,500	-	43,750	1,500	3.43%
23-Jul-13	-	500	24,150	500	2.07%
24-Jul-13	-	850	25,615	850	3.32%
25-Jul-13	-	15,000	55,311	15,000	27.12%
28-Jul-13	-	10,700	106,961	10,700	10.00%
Total	**121,900**	**161,350**	**1,706,390**	**283,250**	**16.60%**

Name	Broker	Code	Realized profit(BDT)	Percentage of Gain
First Securities Services Limited	LankaBangla Securities Ltd.	B1447	980,824	18.53%
Heritage Capital Management Limited	DBL Securities Limited	6353	5,111,262	69.82%
Heritage Capital Management Ltd.	LankaBangla Securities Ltd	B1582	6,187,483	36.26%
Kazi Saifur Rahman	LankaBangla Securities Ltd.	B0589	1,762,434	50.09%
Total			**14,042,003**	**42.30%**

Mentionable that the board of directors of Bangas Limited, in its board meeting held on July 25, 2013, decided to issue Rights Share 1:5R (i.e. 5 rights shares for every 1 existing share) at par for setting up a new project subject to the approval of the shareholders at AGM and also the regulatory authority. Subsequently, the company entered "Issue Management Agreement" and "Underwriting Agreement" with First Securities Services Limited on September 01, 2013 and September 15, 2013 respectively.

Contraventions: Through the aforesaid activities, First Securities Services Limited violated Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969).**Unquote**

Quote

Trading pattern in connection with the shares of TALLUSPIN

After analyzing the trading pattern of selected clients, some are found unusual and suspicious. They had exercised dominant role by trading larger percentages of total market trading of shares of TALLUSPIN. Through these activities some of them also realized significant profit during the period of March 3, 2013 to September 12, 2013. Details are delineated below:

First Securities Services Limited (Code # 6360), a client of DBL Securities Limited, bought 8,11,000 shares and sold 8,11,000 shares of TALLUSPIN during the period from 16.05.2013 to 01.09.2013, which is almost 4.56% of total trade volume of TALLUSPIN at DSE in those trading days in which the client traded. The client contributed significant percentage of total traded volume of TALLUSPIN at DSE in some trading days. Realized gain of the client is 14.29%. Particulars and trade details are shown in the following table:

Brokerage Company: DBL Securities Limited
Name of the client: First Securities Services Limited
BO ID : 1201630044806800**, Client code:** 6360**, Instrument:** TALLUSPIN

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value		Trade volume		
								DSE	FSSL	Client Contribution
16-May-13	280,000	26.76	7,492,800			-		2,212,243	280,000	**12.66%**
19-May-13	30,000	27.35	820,500			-		1,806,676	30,000	1.66%
28-May-13			-	85,000	26.08	2,216,800		580,155	85,000	**14.65%**
29-May-13			-	149,200	26.59	3,967,228		1,016,860	149,200	**14.67%**
30-May-13			-	75,800	27.61	2,092,838		3,393,625	75,800	2.23%
17-Jun-13	100,000	32.91	3,291,000			-		3,234,304	100,000	3.09%
18-Jun-13	100,000	32.42	3,242,000			-		2,270,080	100,000	4.41%
19-Jun-13	200,000	33.37	6,674,000			-		3,471,600	200,000	**5.76%**
24-Jul-13			-	48,000	34.54	1,657,920		1,462,870	48,000	3.28%

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume DSE	Trade volume FSSL	Trade volume Client Contribution
28-Jul-13			-	5,000	34.49	172,450	1,014,010	5,000	0.49%
29-Jul-13			-	100,000	35.27	3,527,000	3,612,987	100,000	2.77%
30-Jul-13	10,000	33.80	338,000			-	1,212,480	10,000	0.82%
31-Jul-13			-	10,100	35.00	353,500	1,377,480	10,100	0.73%
1-Aug-13	91,000	33.90	3,084,900			-	728,630	91,000	**12.49%**
29-Aug-13			-	237,900	42.75	10,170,225	4,382,020	237,900	5.43%
1-Sep-13			-	100,000	43.49	4,349,000	3,767,194	100,000	2.65%
Total	**811,000**	**30.76**	**24,943,200**	**811,000**	**35.15**	**28,506,961**	**35,543,214**	**1,622,000**	**4.56%**
Realized profit						**3,563,761**			
Realized gain (%)						**14.29%**			

First Securities Services Limited (Code # B1447), a client of LankaBangla Securities Ltd, bought 4,83,500 shares and sold 6,76,000 shares of TALLUSPIN during the period from 08.04.2013 to 10.09.2013, which is almost 2.82% of total trade volume of TALLUSPIN at DSE in those trading days in which the client traded. Realized loss of the client is 3.46%. Particulars and trade details are shown in the following table:

Brokerage Company: LankaBangla Securities Ltd.

Name of the client: First Securities Services Limited

BO ID: 1204030044806800**, Client code:** B1447**, Instrument:** TALLUSPIN

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume DSE	Trade volume FSSL	Trade volume Client Contribution
8-Apr-13	15,000	20.05	300,750			-	644,050	15,000	2.33%
9-Apr-13	105,000	21.23	2,229,150			-	1,252,461	105,000	**8.38%**
10-Apr-13	35,000	23.81	833,350			-	1,676,188	35,000	2.09%
20-May-13			-	185,000	27.02	4,998,700	1,991,510	185,000	**9.29%**
29-May-13			-	100,000	26.51	2,651,000	1,016,860	100,000	**9.83%**
30-May-13			-	91,500	28.47	2,605,005	3,393,625	91,500	2.70%
2-Jun-13			-	15,500	31.20	483,600	4,228,400	15,500	0.37%
3-Jun-13	195,000	31.88	6,216,600			-	3,259,443	195,000	**5.98%**
10-Jun-13			-	105,000	32.88	3,452,400	2,080,240	105,000	5.05%
16-Jun-13			-	95,000	33.92	3,222,400	2,579,391	95,000	3.68%
17-Jun-13			-	30,000	34.50	1,035,000	3,234,304	30,000	0.93%
3-Jul-13	18,000	32.30	581,400			-	1,467,550	18,000	1.23%
25-Jul-13			-	18,000	33.49	602,820	1,040,370	18,000	1.73%
18-Aug-13	15,500	38.20	592,100			-	3,915,026	15,500	0.40%
29-Aug-13			-	15,500	43.00	666,500	4,382,020	15,500	0.35%
4-Sep-13	100,000	45.35	4,535,000			-	2,417,522	100,000	4.14%
10-Sep-13			-	20,500	44.81	918,605	2,488,792	20,500	0.82%
Total	**483,500**	**31.62**	**15,288,350**	**676,000**	**30.53**	**20,636,030**	**41,067,752**	**1,159,500**	**2.82%**
Realized profit						**-528,704**			
Realized gain(%)						**-3.46%**			

Kazi Saifur Rahman (Code # B0589), a client of LankaBangla Securities Limited, bought 5,21,000 shares and sold 3,73,000 shares of TALLUSPIN during the period from 30.04.2013 to 04.09.2013, which is almost 3.11% of total trade volume of TALLUSPIN at DSE in those trading days in which the client traded. The client contributed significant percentage of total traded volume of TALLUSPIN at DSE in some trading days. Realized loss of the client is 6.64%. Particulars and trade details are shown in the following table:

Brokerage Company: LankaBangla Securities Limited

Name of the client: Kazi Saifur Rahman

BO ID: 1204030007817574**, Client code:** B0589**, Instrument:** TALLUSPIN

Date	Buy Qty	Buy rate	Buy value	Sale Qty	Sale rate	Sale value	Trade volume		
							DSE	**Kazi Saifur Rahman**	**Client Contribution**
30-Apr-13	100,000	22.63	2,263,000			-	625,200	100,000	**15.99%**
12-May-13			-	102,000	24.69	2,518,380	1,369,780	102,000	**7.45%**
20-May-13	185,000	27.10	5,013,500			-	1,991,510	185,000	**9.29%**
30-May-13			-	25,000	27.74	693,500	3,393,625	25,000	0.74%
2-Jun-13	50,000	31.09	1,554,500			-	4,228,400	50,000	1.18%
9-Jun-13			-	86,400	31.73	2,741,472	2,167,700	86,400	3.99%
10-Jun-13			-	123,600	32.06	3,962,616	2,080,240	123,600	**5.94%**
27-Jun-13	23,000	30.60	703,800			-	1,165,810	23,000	1.97%
9-Jul-13	10,000	32.80	328,000			-	3,178,021	10,000	0.31%
21-Jul-13			-	33,000	34.57	1,140,810	1,609,407	33,000	2.05%
1-Aug-13	3,000	33.80	101,400			-	728,630	3,000	0.41%
1-Sep-13			-	3,000	45.50	136,500	3,767,194	3,000	0.08%
4-Sep-13	150,000	45.21	6,781,500			-	2,417,522	150,000	**6.20%**
Total	**521,000**	**32.14**	**16,745,700**	**373,000**	**30.01**	**11,193,278**	**28,723,039**	**894,000**	**3.11%**
Realized profit						-795,486			
Realized gain (%)						-6.64%			

<u>Kazi Saifur Rahman and Related Group (03 BO IDs)</u>

It has been observed that there is relationship among the above-mentioned three client codes. Relationship details are shown in the table below:

Client Code	Name of Client	Name of Member Company	Remarks
B0589	Kazi Saifur Rahman	Lanka Bangla Securities Ltd	**Own Account of Kazi Saifur Rahman**
B1447	First Securities Services Limited (FSSL)	LankaBangla Securities Ltd	**Kazi Saifur Rahman is the CEO of FSSL**
6330	First Securities Services Limited (FSSL)	DBL Securities Limited	**Kazi Saifur Rahman is the CEO of FSSL**

Collectively, through three client codes, Kazi Saifur Rahman and First Securities Services Limited bought 18,15,500 shares and sold 18,60,000 shares of TALLUSPIN during the period from 08.04.2013 to 10.09.2013, which is almost 4.92% of total trade volume of TALLUSPIN at DSE in those trading days in which the clients traded. They contributed significant percentage of total traded volume of TALLUSPIN at DSE in some trading days. Particulars and trade details are shown in the following table:

Date	Buy Qty	Sale Qty	Trade volume		
			DSE	Kazi Saifur and related Group	Contribution
8-Apr-13	15,000	-	644,050	15,000	2.33%
9-Apr-13	105,000	-	1,252,461	105,000	**8.38%**
10-Apr-13	35,000	-	1,676,188	35,000	2.09%
30-Apr-13	100,000	-	625,200	100,000	**15.99%**
12-May-13	-	102,000	1,369,780	102,000	7.45%
16-May-13	280,000	-	2,212,243	280,000	**12.66%**
19-May-13	30,000	-	1,806,676	30,000	1.66%
20-May-13	185,000	185,000	1,991,510	370,000	**18.58%**
28-May-13	-	85,000	580,155	85,000	**14.65%**
29-May-13	-	249,200	1,016,860	249,200	**24.51%**
30-May-13	-	192,300	3,393,625	192,300	5.67%
2-Jun-13	50,000	15,500	4,228,400	65,500	1.55%
3-Jun-13	195,000	-	3,259,443	195,000	5.98%
9-Jun-13	-	86,400	2,167,700	86,400	3.99%
10-Jun-13	-	228,600	2,080,240	228,600	**10.99%**
16-Jun-13	-	95,000	2,579,391	95,000	3.68%
17-Jun-13	100,000	30,000	3,234,304	130,000	4.02%
18-Jun-13	100,000	-	2,270,080	100,000	4.41%
19-Jun-13	200,000	-	3,471,600	200,000	5.76%
27-Jun-13	23,000	-	1,165,810	23,000	1.97%
3-Jul-13	18,000	-	1,467,550	18,000	1.23%
9-Jul-13	10,000	-	3,178,021	10,000	0.31%
21-Jul-13	-	33,000	1,609,407	33,000	2.05%
24-Jul-13	-	48,000	1,462,870	48,000	3.28%
25-Jul-13	-	18,000	1,040,370	18,000	1.73%
28-Jul-13	-	5,000	1,014,010	5,000	0.49%
29-Jul-13	-	100,000	3,612,987	100,000	2.77%
30-Jul-13	10,000	-	1,212,480	10,000	0.82%
31-Jul-13	-	10,100	1,377,480	10,100	0.73%
1-Aug-13	94,000	-	728,630	94,000	**12.90%**
18-Aug-13	15,500	-	3,915,026	15,500	0.40%
29-Aug-13	-	253,400	4,382,020	253,400	5.78%
1-Sep-13	-	103,000	3,767,194	103,000	2.73%
4-Sep-13	250,000	-	2,417,522	250,000	**10.34%**
10-Sep-13	-	20,500	2,488,792	20,500	0.82%
Total	**1,815,500**	**1,860,000**	74,700,075	3,675,500	4.92%

Mr. Kazi Saifur Rahman and related parties gain from the share trading of TALLUSPIN through these three codes are shown in the table below:

Name	Broker	Code	Realized profit (BDT)	Percentage of gain
First Securities Services Limited	DBL Securities Limited	6360	3,563,761	14.29%
First Securities Services Limited	LankaBangla Securities Ltd.	B1447	(528,704)	-3.46%
Kazi Saifur Rahman	LankaBangla Securities Limited	B0589	(795,486)	-6.64%
Total			**2,239,571**	**4.29%**

Contraventions: Through the aforesaid activities, First Securities Services Limited violated Section 17(e)(v) of the Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969)."

‡h‡nZ, Kwgkb Dc‡iwjøwLZ cwZ‡e`b Abhvqx wmwKDwiwUR AvBb cwicvj‡b e¨_Zvi Rb¨ dv÷ wmwKDwiwUR mvwf©‡mm wjwg‡UW Gi eive‡i GKwU show-cause-cum-hearing notice mÎ bs- SEC/Enforcement/2023/2013/168 ZvwiL 17 GwcÖj 2014 Bs †ciY K‡i Ges 05 ‡g 2014 Bs Zvwi‡L kbvbxi w`b avh© K‡i Ges avh©KZ Zvwi‡L dv÷ wmwKDwiwUR mvwf©‡mm wjwg‡UW Gi cwZwbwa Dcw¯'Z n‡q 05 ‡g 2014 Bs Zvwi‡Li c‡Îi gva¨‡g wjwLZ e³e¨ `vwLj K‡ib| hv‡Z Ab¨v‡b¨i g‡a¨, wb‡bv³ welq¸wji D‡jøL Av‡Q:-

> "1.Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 states as follows:
> "*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,- 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- directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of inducing its purchase by others or depressing its price for the purpose of inducing its sale by others.*"
>
> Accordingly, in order to violate/non-comply with Section 17 (e) (v) of the Securities and Exchange Ordinance, one must **<u>act fraudulently, deceitfully or manipulate</u>** to effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of inducing its purchase by others or depressing its price for the purpose of inducing its sale by others. Moreover, wewa 37(2) of wmwKDwiwUR I G·‡PÄ Kwgkb (gv‡P©U e¨vsKvi I †cvU©‡dvwjI g¨v‡bRvi) wewagvjv, 1996 provides that "e¨e¯'vcbv cwiPvjK/wmBI wnmv‡e wb‡qvMcÖvß e¨w³ †Kvb ÷K G·‡P‡Äi ev, ÷K G·‡P‡Äi †Kvb m`‡m¨i ev, †Kvb m¤ú` e¨e¯'vcK †Kv¤úvwbi ev, †Kvb Bm¨yqvi †Kv¤úvwbi ev, wmwKDwiwUR e¨emvi m‡½ cZ¨¶ ev c‡iv¶ †Kvbfv‡eB RwoZ nB‡Z cvwi‡eb bv| GKB m‡½

wZwb †Kvb gv‡P›U e¨vsKv‡ii †kqvi‡nvìvi ev, D‡`¨v³v ev, cwiPvjK wnmv‡e _wK‡Z cwi‡eb bv|” In view of the said two provisions the trading of shares of Bangas Limited and Tallu Spinning Limited may be reviewed to see whether any non-compliance of the said provisions occurred.

2. Trading of Bangas Limited (Bangas)

The BSEC report states that FSSL bought 19,900 shares and sold 62,450 shares from 08.04.2013 to 26.05.2013 and earned profit Tk. 980,824.00 which is 18.53%. It has also been stated that our trade volume of Bangas at DSE was almost 11.25% in those trading days. It would appear that there may be an error in the calculation in that it would be impossible for us to sell 62,450 shares of Bangas if we had only bought only 19,900 shares of Bangas from 08.04.2013 to 26.05.2013. In reality as is apparent from the summary of purchase and sale of shares of Bangas we had actually bought 79,500 shares of Bangas Ltd and sold the same from 16.09.12 to 26.05.2013.

In this regard it is important to note that, further to your show-cause cum hearing notice we have verified and cross checked our portfolio accounts and it was evident that we had commenced purchase of Bangas shares from 16.09.2012 and we have completed transactions between 16.09.12 to 26.05.2013 instead of transacting from 08.04.2013 to 26.05.2013. As such, by concentrating solely on the period 08.04.2013 to 26.05.2013 it is impossible to obtain a complete picture of the sale and purchase. It is also mentionable that there is no evidence of any short sale (like buying 19,900 shares of Bangs and selling 62,450 shares) or sale of un-matured shares or nil shares or buy and sale the same shares in our own single account in the same day which could attract fraud, deceit or manipulation upon any person, in particular- directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of inducing its purchase by others or depressing its price for the purpose of inducing its sale by others and thereby earn profit or loss. The summary of sale and purchase of the Bangas shares is provided below for your kind review:

Brokerage Company :LankaBangla Securities Limited
Name of the Client :First Securities Services Limited
BO ID :120630044806800
Client Code :B-1447
Instrument :Bangas

Date	Buy			Sell		
	Qunatity	Rate	Value (Tk)	Qunatity	Rate	Value (Tk)
16:09:12	1,000	156.30	156,300			-
18:09:12	9,900	181.00	1,791,900			-
19:09:12	100	188.10	18,810			-
20:09:12	1,050	188.50	197,925			-
23:09:12	4,000	205.00	820,000			-
27:09:12			-	6,050	243.00	1,470,150
2:10:12			-	10,000	250.20	2,502,000
15:01:13	4,300	185.10	795,930			-
30:01:13	5,500	191.00	1,050,500			-
3:02:13	3,000	194.10	582,300			-
4:02:13	7,000	191.60	1,341,200			-
5:02:13	2,000	190.10	380,200			-
6:02:13	3,550	190.70	676,985			-
7:02:13	1,000	190.10	190,100			-
11:02:13	4,000	188.00	752,000			-
14:02:13	3,000	187.10	561,300			-
17:02:13	3,300	187.60	619,080			-
18:02:13	3,000	188.00	564,000			-
19:02:13	2,000	185.40	370,800			-
20:02:13	900	181.00	162,900			-
25:02:13	500	177.50	88,750			-
26:02:13	500	179.00	89,500			-
8:04:13	7,500	190.70	1,430,250			-
15:04:13	200	236.50	47,300			-
16:04:13	2,500	242.00	605,000			-
21:04:13				1,600	301.00	481,600
22:04:13			-	23,000	291.00	6,693,000
23:04:13			-	10,000	308.40	3,084,000
24:04:13			-	6,400	335.00	2,144,000
25:04:13			-	12,750	320.10	4,081,275
8:05:13	5,000	324.30	1,621,500			-
9:05:13	1,700	324.80	552,160			552,160
15:05:13	3,000	341.00	1,023,000			-
21:05:13			-	3,400	352.50	1,198,500
22:05:13			-	4,200	354.00	1,486,800
26:05:13			-	2,100	365.90	768,390
Total	**79,500**		**16,489,690**	**79,500**		**24,461,875**

In your show-cause cum hearing notice you have stated that we have not complied with Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 and such statement has been made by you by emphasizing on the trade volume of Bangas at DSE only as well as looking at the proportion of profit earned by FSSL from the said trading of the shares. We shall consider both propositions herein below:

Trade Volume: As regards the volume of trade we would like to humbly submit that we have no control over the trade volume since trading of shares are originated by authorized dealers of brokerage houses through different workstations in and all around the country. We can and had only made orders to buy shares to brokerage houses through their authorized dealers if we have sufficient debit balance in our account. The execution power of the buy and sales of shares is vested with the authorized dealers and not with us. In addition to that some of the listed securities are traded insignificantly in a day or even in a week or month or years. So much so that even trading of 10 or 25 or 50 or 100 shares of a particular security in a day in any brokerage house can amount to 100% of the total trade volume of the same shares at DSE in the same trading day(s). Such trading can be done innocently and in the course of business without any intention to defraud, manipulate and deceive. As such since the trades carried out by me was carried out innocently in the course of business we humbly submit that such trading does not attract non-compliance of Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 since it was not done by short sale or sale of un-matured shares or nil shares or buy and sale the same shares in own single account in the same day, etc for attracting investors to buy a particular share (like Bangas) or depressing investors to sale shares. In addition to that in calculating market trade volume of Bangas shares, CSE trade volume was not considered with DSE trade volume. Thus, the trade volume percentage will be reduced if we consider the CSE trade volume together with DSE.

Profit volume: Any trading is carried out for the purpose of making a profit. However, it is possible that any trade carried out may cause profit or loss, whether substantial or insignificant. Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 does not prohibit the earning of loss or provide compensation for loss. It prohibits inducing loss or profit by means of fraud, deceit and manipulation. As such the presence of fraud, deceit and manipulation is an essential element and it is our humble submission that since fraud, deceit and manipulation is clearly absent in the trades carried out by me non-compliance of Section 17(e) (v) of the Securities and Exchange Ordinance, 1969 has not occurred.

Therefore, it is our humble submission that the share trading of Bangas was carried out in compliance to the securities laws and on regular basis and does not violated Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 in any manner whatsoever.

It is further mentionable that buying and selling of company own shares are restricted by law for sponsors/directors of the respective company and its top executives and not for Issue Manager and or Underwriter unless it is an insider trading which could attract non-compliance of Section 17 (e) (v) of Securities and Exchange Ordinance, 1969. In this instant, inside trading would only be possible if the shares are traded in FSSL own portfolio account after the execution of issue management agreement.

From records it can be seen that we did not trade any Bangas shares after our Issue Management Agreement date on September 01, 2013. Accordingly, there is no possibility for insider trading of Bangas shares by us since our issue management agreement was made on September 01, 2013 which was far more beyond our last trading date (May 26, 2013) of Bangas shares.

3. Trading of Tallu Spinning (Tallu)

As per the BSEC report we bought 811,000 shares and sold 811,000 shares from 16.05.2013 to 01.09.2013 and earned profit Tk. 3,563,761.00 which is 14.29% on BO account held at DBL Securities Limited. It was further mentioned that our trade volume of Tallu Spinning at DSE was almost 4.56% in those trading days. The summary of the trading shares of Tallu Spinning is given below for your kind consideration:

Brokerage Company :DBL Securities Limited
Name of the Client :First Securities Services Limited
BO ID :120630044806800
Client Code :6360
Instrument :Tallu Spining

Date	Buy			Sell		
	Qunatity	Rate	Value (Tk)	Qunatity	Rate	Value (Tk)
16.05.13	280,000	26.76	7,492,800			-
19.05.13	30,000	27.35	820,500			-
28.05.13			-	85,000	26.08	2,216,800
29.05.13			-	149,200	26.59	3,967,228
30.05.13			-	75,800	27.61	2,092,838
17.06.13	100,000	32.91	3,291,000			-
18.06.13	100,000	32.42	3,242,000			-
19.06.13	200,000	33.37	6,674,000			-
24.07.14			-	48,000	34.54	1,657,920
28.07.14			-	5,000	34.49	172,450
29.07.14			-	100,000	35.27	3,527,000
30.07.14	10,000	33.80	338,000			
31.07.14			-	10,100	35.00	353,500
01.08.14	91,000	33.90	3,084,900			-
29.08.14			-	237,900	42.75	10,170,225
01.09.13			-	100,000	43.49	4,349,000
Total	**811,000**		**24,943,200**	**811,000**		**28,506,961**

It can be seen from the figures of buying and selling as provided below, there was no short selling or sale of un-matured shares or nil shares or buy and sale of the same shares in our own single account in the same day. As a result it is clear that there is no fraud, deceit or manipulation upon any person, in particular- directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of inducing its purchase by others or depressing its price for the purpose of inducing its sale by others and thereby earn profit or loss by the trading of the Tallu shares.

The BSEC report further stated that we bought 483,500 shares and sold 676,000 shares from 30.04.2013 to 04.09.2013 and earned loss Tk. 528,704.00 which is -3.46% on the BO Account held at LankaBangla Securities Limited. It was further mentioned that our trade volume of Tallu Spinning at DSE was almost 2.82% in those trading days.

In this regard, it is impossible to ascertain how we could sell 676,000 shares of Tallu Spinning if we bought only 483,500 shares of Tallu Spinning from 30.04.2013 to 04.09.2013. We actually bought 1,693,500 shares of Tallu Spinning and sold 1564,000 shares from 24.07.2012 to 10.09.2013.

In this regard it is important to note that, further to your show-cause cum hearing notice we have verified and cross checked our portfolio accounts and it was evident that we had commenced purchase of Bangas shares from 24.07.2012 instead of buying of shares from 08.04.2013. As such, by concentrating solely on the period 08.04.2013 to 26.05.2013 it is impossible to obtain a complete picture of the sale and purchase. It is also mentionable that there is no evidence of any short sale (like buying 19,900 shares of Bangs and selling 62,450 shares) or sale of un-matured shares or nil shares or buy and sale the same shares in our own single account in the same day which could attract fraud, deceit or manipulation upon any person, in particular- directly or indirectly effect a series of transactions in any security creating the appearance of active trading therein or of raising of price for the purpose of inducing its purchase by others or depressing its price for the purpose of inducing its sale by others and thereby earn profit or loss. We have made a summary of the Tallu Spinning shares as follows from our portfolio account for your kind review:

Brokerage Company :LankaBangla Securities Limited
Name of the Client :First Securities Services Limited
BO ID :120630044806800
Client Code :B-1447
Instrument :Tallu Spining

Date	Buy			Sell		
	Qunatity	Rate	Value (Tk)	Qunatity	Rate	Value (Tk)
24.07.12	850,000	10.00	8,500,000			-
24.07.12	-	-	-	560,700	26.00	14,578,200
25.07.12			-	289,300	25.70	7,435,010
13.09.12	7,500	33.90	254,250			-
19.09.12			-	7,500	37.80	283,500
04.11.12	75,000	39.20	2,940,000			-
05.11.12	25,000	39.80	995,000			
15.01.13	50,000	24.50	1,225,000			-
22.01.13	10,000	-	-			-
29.01.13	23,500	25.40	596,900			-
30.01.13	50,000	25.50	1,275,000			-
07.02.13			-	500	26.90	13,450
08.04.13	15,000	20.10	301,500			-
09.04.13	105,000	21.70	2,278,500			-
10.04.13	39,000	23.80	928,200			-
20.05.13			-	185,000	26.90	4,976,500
29.05.13			-	100,000	26.50	2,650,000
30.05.13			-	91,500	28.40	2,598,600
02.06.13			-	15,500	31.20	483,600
03.06.13	260,000	32.00	8,320,000			-
10.06.13			-	125,000	32.70	4,087,500
16.06.13			-	105,000	33.50	3,517,500
17.06.13			-	30,000	34.50	1,035,000
03.07.13	18,000	32.30	581,400			-
25.07.13			-	18,000	33.40	601,200
18.08.13	15,500	38.20	592,100			-
29.08.13			-	15,500	43.00	666,500
04.09.13	150,000	45.00	6,750,000			-
10.09.13			-	20,500	44.90	920,450
Total	**1,693,500**		**35,537,850**	**1,564,000**		**43,847,010**

In your show-cause cum hearing notice you have stated that we have not complied with Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 and such statement has been made by you by emphasizing on the trade volume of Tallu at DSE only as well as looking at the proportion of profit earned by FSSL from the said trading of the shares. We shall consider both propositions herein below:

Trade Volume: As regards the volume of trade we would like to humbly submit that we have no control over the trade volume since trading of shares are originated by authorized dealers of brokerage houses through different workstations in and all around the country. We can and had only made orders to buy shares to brokerage houses through their authorized dealers if we have sufficient debit balance in our account. The execution power of the buy and sales of shares is vested with the authorized dealers and not with us. In addition to that some of the listed securities are traded insignificantly in a day or even in a week or month or years. So much so that even trading of 10 or 25 or 50 or 100 shares of a particular security in a day in any brokerage house can amount to 100% of the total trade volume of the same shares at DSE in the same trading day(s). Such trading can be done innocently and in the course of business without any intention to defraud, manipulate and deceive. As such since the trades carried out by me was carried out innocently in the course of business we humbly submit that such trading does not attract non-compliance of Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 since it was not done by short sale or sale of un-matured shares or nil shares or buy and sale the same shares in own single account in the same day, etc for attracting investors to buy a particular share (like Tallu) or depressing investors to sale shares. In addition to that in calculating market trade volume of Tallu's shares, CSE trade volume was not considered with DSE trade volume. Thus, the trade volume percentage will be reduced if we consider the CSE trade volume together with DSE.

Profit volume: Any trading is carried out for the purpose of making a profit. However, it is possible that any trade carried out may cause profit or loss, whether substantial or insignificant. Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 does not prohibit the earning of loss or provide compensation for loss. It prohibits inducing loss or profit by means of fraud, deceit and manipulation. As such the presence of fraud, deceit and manipulation is an essential element and it is our humble submission that since fraud, deceit and manipulation is clearly absent in the trades carried out by me non-compliance of Section 17(e) (v) of the Securities and Exchange Ordinance, 1969 has not occurred.

Therefore, it is our humble submission that the share trading of Bangas was carried out in compliance to the securities laws and on regular basis and does not violated Section 17 (e) (v) of Securities and Exchange Ordinance, 1969 in any manner whatsoever.

Under the aforementioned facts and circumstances, we would humbly and earnestly request you to conclude that given the lack of fraud, deceit and manipulation there was no non-compliance of Section 17 (e) (v) of Securities and Exchange Ordinance, 1969. Notwithstanding the above, should you believe that we may be able to carry out our activities more diligently we would appreciate and be grateful for any guidance you may provide us so we may be able to carry out our business more positively."

‡h‡nZ, dv÷ wmwKDwiwUR mwf‡mm wjwg‡UW ZwiL 05 ‡g 2014 Bs c‡Îi gva¨‡g DwjøwLZ e¨_Zv Z_¨ wewa weavb jsNb msµvšÍ Awf‡hvM ¯^xKvi K‡i †h wjwLZ e¨vL¨v c`vb K‡i‡Q Zv Kwgk‡bi wbKU Mnb‡hvM¨ e‡j we‡ewPZ nqwb Ges dv÷ wmwKDwiwUR mwf‡mm wjwg‡UW Gi D³ jsNb B”QvKZ e‡j cZxqgvb nq;

‡h‡nZ, wmwKDwiwUR msµvšÍ DwjøwLZ AvBb I Dnvi Aaxb RvwiKZ wewa-weavb cwicvj‡b dv÷ wmwKDwiwUR mwf‡mm wjwg‡UW Gi D³iƒc e¨_Zv Securities and Exchange Ordinance, 1969 Gi section 22 Gi Aaxb kv¯‡hvM¨ Acivi;

‡h‡nZ, Kwgk‡bi we‡ePbvq, wmwKDwiwUR AvBb cwicvj‡b DwjøwLZ e¨_Zvi Rb¨, Z_¨ cwRevRv‡ii Dbœq‡bi cvkvcvwk evRv‡ii ksLjv I ¯^”QZv i¶vi ¯^v‡_ dv÷ wmwKDwiwUR mwf‡mm wjwg‡UW†K Rwigvbv Kiv c‡qvRb I mgxPxb;

AZGe, †m‡nZ, Kwgkb, DwjøwLZ hveZxq wel‡q we‡ePbvceK, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) Gi section 22 [hv The Securities and Exchange (Amendment) Act, 2000 Øviv ms‡kvwaZ] G c`Ë ¶gZve‡j dv÷ wmwKDwiwUR mwf‡mm wjwg‡UW Gi Dci 15 (c‡bi) j¶ UvKv Rwigvbv avh¨ Kij hv AÎ Av‡`‡ki ZvwiL n‡Z 15 (c‡bi) w`‡bi g‡a¨ ‘evsjv‡`k wmwKDwiwUR A¨vÛ G·‡PÄ Kwgkb’ Gi AbK‡j Bm¨KZ e¨vsK WvdU/†c-AW©v‡ii gva¨‡g Kwgk‡b Rgv Ki‡Z n‡e|

evsjv‡`k wmwKDwiwUR A¨vÛ G·‡PÄ Kwgk‡bi Av‡`kµ‡g,

Aa¨vcK W: Gg Lvqiæj †nv‡mb
‡Pqvig¨vb

weZibt
dv÷ wmwKDwiwUR mwf‡mm wjwg‡UW
166-167 Avj ivRx Kg‡cø·, mCU- 702, 703, weRq bMi, cievbv cëb XvKv-1000|
dvb bs- 9585325, 9585326