

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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বিএসইসি/এনফোর্সমেন্ট/৩৪২৭ (পার্ট-২)/২০২৩/৫৫২

তারিখঃ এপ্রিল ১৫, ২০২৫

Mr. Ulfat Karim

(BO ID: 1202090065562496)

Floralia, Flat # B1, House # 20,

Road # 79, Gulshan -2, Dhaka.

বিষয়: আদেশ।

কমিশনের আদেশ নং- নং-বিএসইসি/এনফোর্সমেন্ট/৩৪২৭ (পার্ট-২)/২০২৩/৫৫১ তারিখঃ এপ্রিল ১৫, ২০২৫ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,


১৫/০৪/২০২৫

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, এমএসআই, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি। [BSEC/Surveillance/2003-0103]
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৪২৭ (পার্ট-২)/২০২৩/৫৫১

তারিখঃ এপ্রিল ১৫, ২০২৫

আদেশ

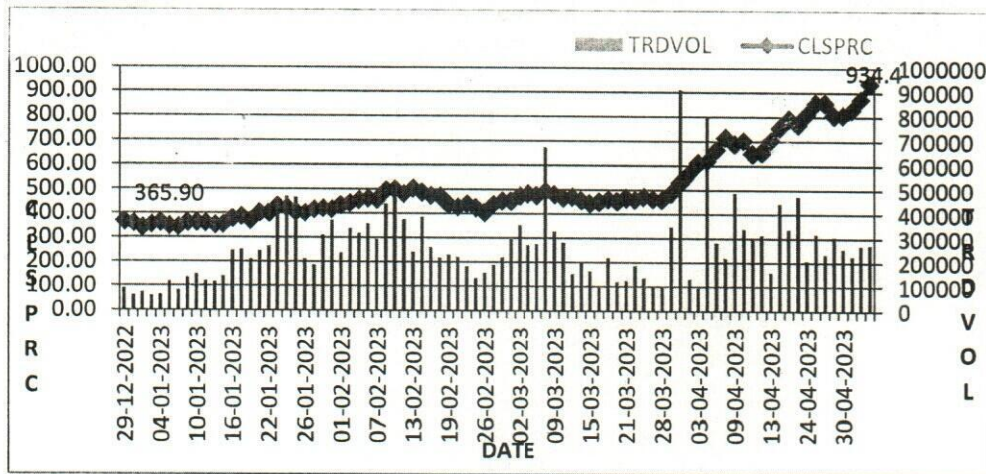
যেহেতু, Securities and Exchange Ordinance, 1969 এর Section 2 (cc) মোতাবেক কমিশন অর্থ বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন যা বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন আইন, ১৯৯৩-এর অধীনে গঠিত;

যেহেতু, কমিশনের পত্র নং BSEC/Surveillance/2003-0103 (Vol:II)/249 তারিখ: মে ০৯, ২০২৩ দ্বারা প্রদত্ত ক্ষমতাবলে ঢাকা স্টক এক্সচেঞ্জ লিমিটেড ০১ জানুয়ারি ২০২৩ হতে ০৭ মে ২০২৩ পর্যন্ত সময়ে Gemini Sea Food Ltd. (GEMINISEA)-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:

Description of alleged violation of securities laws:

Whereas, Pursuant to the letter No. BSEC/Surveillance/2003-0103 (Vol:II)/249 dated May 09, 2023 received from the Bangladesh Securities and Exchange Commission (BSEC), the investigation team of Dhaka Stock Exchange Ltd. (DSE) investigated the share trading of Gemini Sea Food Ltd. (GEMINISEA) for the period from 01.01.2023 to 07.05.2023 and prepared this report. The investigation team randomly examined the documents collected from different TREC holders of clients regarding share trading of Gemini Sea Food Limited. From the investigation report it appears, among others, that:

OBSERVATION ON THE PRICE MOVEMENT OF GEMINI SEA FOOD LTD.:



YCP of GEMINISEA share as on 01.01.2023 was Tk. 365.90 and closing price of the same was Tk. 934.40 as on 07.05.2023. During this period from 01.01.2023 to 07.05.2023, price of GEMINISEA shares was increased by Tk. 568.50 which is approximately 158.71% higher compared to closing price of 29.12.2022.

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Observations and findings:

The investigation team collected required documents from different TREC holders regarding share trading of Gemini Sea Food Ltd. After examining the relevant documents, our findings are as follows:

- After analyzing documents, it is observed that Ms. Risana Karim (Client code # 11788 of UCB Stock Brokerage Limited) and her brother Mr. Ulfat Karim (Client code # H0840 of NCCB Securities and Financial Services Ltd.) was the top and 2nd top buyer of "GEMINISEA" share from 01.01.2023 to 07.05.2023. Through the aforesaid code Ms. Risana Karim bought 652,872 and sold 453,479 shares which is 4.74% of total traded share of "GEMINISEA" and Mr. Ulfat Karim bought 587,174 and sold 337,090 shares which is 3.96% of total traded share of "GEMINISEA" during the investigation period. It was observed that the aforesaid clients were involved with the following accounts through which they traded shares of "GEMINISEA" during the investigation period.

Sl. No.	CLIENT_ID	BO_NAME	DP_NAME
1	3214	RISANA KARIM	AB Securities Limited
2	11755	RISANA KARIM	UCB Stock Brokerage Limited
3	11788	RISANA KARIM	UCB Stock Brokerage Limited
4	10114	RISANA KARIM	MTB Securities Limited
5	H0840	ULFAT KARIM	NCCB Securities and Financial Services Ltd.
6	3371	MOHAMMAD EBADUL KARIM	AB Securities Limited
7	23176	MD.SOHEL ALAM	MTB Securities Limited
8	7397	FATEMA SOHEL	AB Securities Limited

A. Trade details of Risana Karim and her associates:

Observations- 1:

After analyzing documents, it is observed that Ms. Risana Karim (Client code # 11788 of UCB Stock Brokerage Limited) and her brother Mr. Ulfat Karim (Client code # H0840 of NCCB Securities and Financial Services Ltd.) was the top and 2nd top buyer of "GEMINISEA" share from 01.01.2023 to 07.05.2023. It was observed that the aforesaid clients were involved with the following accounts through which they traded shares of "GEMINISEA" during the investigation period.

Sl. No.	BOID	CLIENT_ID	BO_NAME	DP_NAME	Remarks
1	1203710043493921	3214	RISANA KARIM	AB Securities Limited	Single Account
2	1205590043493921	11755	RISANA KARIM	UCB Stock Brokerage Ltd	Single Account
3	1205590075153283	11788	RISANA KARIM	UCB Stock Brokerage Ltd	Joint Account
4	1601880075153283	10114	RISANA KARIM	MTB Securities Limited	Joint Account
5	1202090065562496	H0840	ULFAT KARIM	NCCB Securities and Financial Services Ltd.	Brother of RISANA KARIM
6	1203710046187231	3371	MOHAMMAD EBADUL KARIM	AB Securities Limited	Father of RISANA KARIM and ULFAT KARIM
7	1601880043377493	23176	MD. SOHEL ALAM	MTB Securities Limited	Brother-in-law of MOHAMMAD EBADUL KARIM
8	1203710061475661	7397	FATEMA SOHEL	AB Securities Limited	Fatema Sohel is the nominee and spouse of Md. Sohel Alam.

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Individual Trade Patterns, Trade monitoring screenshots, Effects of "GEMINISEA" at DSE in public market by the said client and gain and loss statement of Risana Karim and her associates are given below (as per DSE trade data):

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

Date	Code # 3214				Code # 11755				Code # 11788				Code # 10114				Code # H0840			
	BO ID # 1203710043493921				BO ID # 1205590043493921				BO ID # 1205590075153283				BO ID # 1601880075153283				BO ID # 1202090065562496			
	Risana Karim				Risana Karim				Risana Karim				Risana Karim				Ulfat Karim			
	AB Securities Limited				UCB Stock Brokerage Limited				UCB Stock Brokerage Limited				MTB Securities Limited				NCCB Securities and Financial Services			
	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.)
22-01-2023	400	410.20	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
24-01-2023	400	427.68	400	440.18	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-01-2023	200	407.62	100	419.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-01-2023	0	0.00	200	411.85	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-01-2023	200	414.75	200	426.10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-01-2023	100	413.20	100	422.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-02-2023	0	0.00	100	422.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
02-02-2023	0	0.00	200	446.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-03-2023	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
29-03-2023	200	464.40	0	0.00	0	0.00	0	0.00	101935	481.80	0	0.00	0	0.00	0	0.00	9999	456.87	0	0.00
30-03-2023	1773	526.74	0	0.00	400	528.10	0	0.00	62327	527.67	0	0.00	0	0.00	0	0.00	21810	492.87	0	0.00
02-04-2023	0	0.00	200	567.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
03-04-2023	0	0.00	773	610.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
04-04-2023	2000	630.71	1000	656.00	0	0.00	0	0.00	154031	655.08	0	0.00	5800	639.43	0	0.00	0	0.00	0	0.00
05-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	3123	658.01	0	0.00	5000	664.97	0	0.00	0	0.00	0	0.00
06-04-2023	0	0.00	2000	712.75	0	0.00	0	0.00	4300	713.60	0	0.00	20000	714.80	0	0.00	0	0.00	0	0.00
09-04-2023	2000	700.14	0	0.00	0	0.00	0	0.00	35422	737.97	44936	696.90	11000	730.40	0	0.00	12749	699.83	0	0.00
10-04-2023	1000	700.00	0	0.00	0	0.00	0	0.00	10000	713.45	10332	700.80	0	0.00	0	0.00	0	0.00	0	0.00
11-04-2023	3400	695.27	1200	710.66	0	0.00	0	0.00	5100	702.23	0	0.00	0	0.00	0	0.00	6048	720.08	0	0.00
12-04-2023	1800	639.26	1800	656.30	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	22274	654.88
13-04-2023	0	0.00	3400	686.43	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-04-2023	1800	734.00	1800	756.20	0	0.00	0	0.00	20000	756.20	40000	752.41	0	0.00	0	0.00	65529	755.38	0	0.00
17-04-2023	400	752.73	0	0.00	0	0.00	0	0.00	41100	768.54	264	766.10	0	0.00	0	0.00	11469	777.30	0	0.00
18-04-2023	4111	772.94	1800	789.25	0	0.00	0	0.00	57593	774.36	0	0.00	0	0.00	0	0.00	1951	801.54	2000	769.10
24-04-2023	200	761.10	400	775.50	0	0.00	0	0.00	320	771.00	0	0.00	0	0.00	0	0.00	3437	809.51	0	0.00
25-04-2023	2138	829.97	4111	843.15	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-04-2023	2800	848.61	200	859.00	0	0.00	0	0.00	25820	848.68	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	10000	818.46	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-04-2023	1000	813.39	600	813.40	0	0.00	0	0.00	17918	806.53	0	0.00	0	0.00	0	0.00	4250	812.44	0	0.00
02-05-2023	600	823.70	600	835.10	0	0.00	0	0.00	4000	827.89	1874	829.68	0	0.00	0	0.00	0	0.00	0	0.00
03-05-2023	600	846.07	2100	865.03	0	0.00	0	0.00	28133	865.48	8155	850.75	0	0.00	0	0.00	0	0.00	0	0.00
07-05-2023	720	903.42	2520	919.79	0	0.00	0	0.00	26712	934.98	0	0.00	6000	919.50	0	0.00	0	0.00	0	0.00
Total	27842		25804		400		0		607834		105561		47800		0		296074		24274	

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Date	Code # 23176				Code # 3371				Code # 7397				Total					
	BOID #1601880043377493				BOID #1203710046187231				BOID #1203710061475661									
	MD.SOHEL ALAM				MOHAMMAD EBADUL KARIM				FATEMA SOHEL									
	MTB Securities Limited				AB Securities Limited				AB Securities Limited									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
22-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	400	410.20	164080.00	0	0.00	0.00
24-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	400	427.68	171070.00	400	440.18	176070.00
26-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	200	407.62	81524.00	100	419.60	41960.00
29-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	200	411.85	82370.00
30-01-2023	0	0.00	0	0.00	300	421.10	0	0.00	0	0.00	0	0.00	500	418.56	209279.60	200	426.10	85220.00
31-01-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	100	413.20	41320.00	100	422.00	42200.00
01-02-2023	0	0.00	0	0.00	0	0.00	300	433.17	0	0.00	0	0.00	0	0.00	0.00	400	430.38	172150.00
02-02-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	200	446.30	89260.00
28-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	9999	456.87	4568224.00	0	0.00	0.00
29-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	123945	483.72	59954454.50	0	0.00	0.00
30-03-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	223332	527.91	117898905.60	0	0.00	0.00
02-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	200	567.80	113560.00
03-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	773	610.30	471761.90
04-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	161831	654.22	105873049.10	1000	656.00	656000.00
05-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	8123	662.29	5379815.90	0	0.00	0.00
06-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	24300	714.59	17364498.00	2000	712.75	1425490.00
09-04-2023	4500	740.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	65671	728.28	47827202.90	44936	696.90	31315765.20
10-04-2023	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	11000	712.23	7834526.80	10332	700.80	7240695.70
11-04-2023	0	0.00	0	0.00	500	697.90	0	0.00	0	0.00	0	0.00	15048	707.69	10649292.30	1200	710.66	852790.00
12-04-2023	0	0.00	0	0.00	1000	653.94	0	0.00	0	0.00	0	0.00	2800	644.50	1804604.00	24074	654.98	15768094.70
13-04-2023	0	0.00	0	0.00	0	0.00	500	674.00	0	0.00	0	0.00	0	0.00	0.00	3900	684.84	2670870.00
16-04-2023	0	0.00	0	0.00	1000	741.80	1000	756.20	0	0.00	0	0.00	88329	754.97	66686155.00	42800	752.65	32213624.60
17-04-2023	0	0.00	0	0.00	200	745.10	0	0.00	0	0.00	3000	780.00	53169	770.22	40951785.20	3264	778.88	2542251.20
18-04-2023	0	0.00	0	0.00	500	800.56	500	813.00	0	0.00	0	0.00	64155	775.30	49739322.20	4300	782.64	3365349.50
24-04-2023	0	0.00	0	0.00	600	764.33	700	778.37	0	0.00	0	0.00	4557	798.73	3639812.30	1100	777.33	855060.00
25-04-2023	0	0.00	0	0.00	4452	847.01	500	834.80	0	0.00	0	0.00	6590	841.48	5545380.80	4611	842.24	3883570.40
26-04-2023	0	0.00	0	0.00	12300	859.46	500	862.73	3000	852.00	0	0.00	43920	851.92	37416371.50	700	861.66	603165.00
27-04-2023	0	0.00	0	0.00	2400	822.40	50	829.40	0	0.00	0	0.00	12400	819.22	10158326.60	50	829.40	41470.00
30-04-2023	0	0.00	0	0.00	1000	815.30	2200	813.95	0	0.00	0	0.00	24168	808.22	19533033.30	2800	813.83	2278723.90
02-05-2023	0	0.00	0	0.00	3500	816.18	2500	829.60	0	0.00	0	0.00	8100	822.52	6662386.10	4974	830.29	4129872.60
03-05-2023	0	0.00	0	0.00	1146	848.32	4646	860.92	0	0.00	0	0.00	29879	864.43	25828260.90	14901	855.93	12754276.20
07-05-2023	0	0.00	0	0.00	2420	909.28	4420	922.91	0	0.00	0	0.00	35852	930.02	33343102.60	6940	921.78	6397164.00
Total	4500		0		31318		17816		3000		3000		1018768			176455		

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ii. Effects of "GEMINISEA" at DSE (both Public Market and Block Market) by Risana Karim and her associates:

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance										0	0.00	0.00						
22-01-2023	400	410.20	164080.0	0	0.00	0.0	0	0.00	0.0	400	410.20	164080.0	265928	400.00	-0.50%	0.15%	0.00%	0.15%
24-01-2023	400	427.68	171070.0	400	440.18	176070.0	0	418.94	167575.0	400	418.94	167575.0	475374	424.30	-1.10%	0.08%	0.08%	0.17%
26-01-2023	200	407.62	81524.0	100	419.60	41960.0	0	415.17	41516.5	500	415.17	207582.5	214295	401.30	-0.94%	0.09%	0.05%	0.14%
29-01-2023	0	0.00	0.0	200	411.85	82370.0	0	415.17	83033.0	300	415.17	124549.5	188119	416.70	3.84%	0.00%	0.11%	0.11%
30-01-2023	500	418.56	209279.6	200	426.10	85220.0	0	417.29	83457.3	600	417.29	250371.8	311969	420.20	0.84%	0.16%	0.06%	0.22%
31-01-2023	100	413.20	41320.0	100	422.00	42200.0	0	416.70	41670.3	600	416.70	250021.6	375521	416.30	-0.93%	0.03%	0.03%	0.05%
01-02-2023	0	0.00	0.0	400	430.38	172150.0	0	416.70	166681.0	200	416.70	83340.5	238624	434.00	4.25%	0.00%	0.17%	0.17%
02-02-2023	0	0.00	0.0	200	446.30	89260.0	0	416.70	83340.5	0	0.00	0.0	339553	444.10	2.33%	0.00%	0.06%	0.06%
28-03-2023	9999	456.87	4568224.0	0	0.00	0.0	0	0.00	0.0	9999	456.87	4568224.0	98778	456.70	-1.17%	10.12%	0.00%	10.12%
29-03-2023	123945	483.72	59954454.5	0	0.00	0.0	0	0.00	0.0	133944	481.71	64522678.5	499595	485.70	6.35%	24.81%	0.00%	24.81%
30-03-2023	223332	527.91	117898905.6	9999	485.70	4856514.3	0	510.59	5105390.3	347277	510.59	177316193.8	1007118	528.20	8.75%	22.18%	0.99%	23.17%
02-04-2023	0	0.00	0.0	25507	502.79	12824770.7	0	510.59	13023621.4	321770	510.59	164292572.5	161203	567.80	7.50%	0.00%	15.82%	15.82%
03-04-2023	0	0.00	0.0	121268	561.35	68074039.8	0	510.59	61918238.7	200502	510.59	102374333.7	313217	610.30	7.49%	0.00%	38.72%	38.72%
04-04-2023	313531	611.10	191599619.1	164735	566.47	93318070.0	0	571.90	94211459.4	349298	571.90	199762493.4	960113	618.60	1.36%	32.66%	17.16%	49.81%
05-04-2023	13873	628.23	8715390.9	33222	579.65	19257130.0	0	574.05	19071049.9	329949	574.05	189406834.4	360313	665.00	7.50%	3.85%	9.22%	13.07%
06-04-2023	24300	714.59	17364498.0	12773	634.33	8102356.8	0	583.69	7455462.8	341476	583.69	199315869.6	258805	714.80	7.49%	9.39%	4.94%	14.32%
09-04-2023	99271	741.86	73645442.9	51696	692.30	35788968.2	0	619.32	32016118.1	389051	619.32	240945194.4	534887	687.80	-3.78%	18.56%	9.66%	28.22%
10-04-2023	11000	712.23	7834526.8	10332	700.80	7240695.7	0	621.87	6425161.0	389719	621.87	242354560.2	352059	701.50	1.99%	3.12%	2.93%	6.06%
11-04-2023	30726	687.41	21121278.3	1200	710.66	852790.0	0	626.66	751991.4	419245	626.66	262723847.2	318116	648.90	-7.50%	9.66%	0.38%	10.04%
12-04-2023	2806	644.50	1804604.0	24074	654.98	15768094.7	0	626.78	15098044.6	397971	626.78	249439401.6	314968	654.50	0.86%	0.84%	7.64%	8.53%
13-04-2023	0	0.00	0.0	82756	660.65	54672779.6	0	626.78	51869626.5	315215	626.78	197569775.1	243696	703.50	7.49%	0.00%	33.96%	33.96%
16-04-2023	88329	754.97	66686155.0	43801	750.54	32874284.6	0	654.84	28682557.5	359743	654.84	235573372.6	450007	756.20	7.49%	19.63%	9.73%	29.36%
17-04-2023	53169	770.22	40951785.2	10694	724.33	7745937.2	0	669.70	7161719.8	402218	669.70	269363438.0	348005	790.40	4.52%	15.28%	3.07%	18.35%
18-04-2023	183155	781.60	143154322.2	125800	783.89	98612849.5	0	704.71	88652422.0	459573	704.71	323865338.2	601478	769.10	-2.69%	30.45%	20.92%	51.37%
24-04-2023	4557	798.73	3639812.3	5105	726.08	3706620.0	0	705.63	3602253.2	459025	705.63	323902897.2	213298	810.40	5.37%	2.14%	2.39%	4.53%
25-04-2023	14990	821.04	12307380.8	22417	790.59	17722658.4	0	709.28	1589973.2	451598	709.28	320310304.8	392826	855.90	5.61%	3.82%	5.71%	9.52%
26-04-2023	43920	851.92	37416371.5	5530	807.95	4467984.0	0	721.92	3992243.5	489988	721.92	353734432.8	249792	855.40	-0.06%	17.58%	2.21%	19.80%
27-04-2023	12400	819.22	10158326.6	50	829.40	41470.0	0	724.33	36216.3	502338	724.33	363856543.1	342063	805.40	-5.85%	3.63%	0.01%	3.64%
30-04-2023	24168	808.22	19533033.3	2800	813.83	2278723.9	0	728.18	2038895.7	523706	728.18	381350680.7	263057	806.60	0.15%	9.19%	1.06%	10.25%
02-05-2023	8100	822.52	6662386.1	12290	785.79	9657392.6	0	729.61	8966955.2	519516	729.61	379046111.6	256747	827.30	2.57%	3.15%	4.79%	7.94%
03-05-2023	41879	845.97	35428260.9	53001	812.43	43059466.2	0	738.29	39130302.6	508394	738.29	375344069.9	319935	870.50	5.22%	13.09%	16.57%	29.66%
07-05-2023	35852	930.02	33343102.6	36939	846.62	31273294.0	0	750.92	27738367.3	507307	750.92	380948805.2	318327	934.40	7.34%	11.26%	11.60%	22.87%
Total	1364896	669.98	914455154.2	857589	668.02	572886120.2	0	622.10	533506349.0	507307	750.92	380948805.2						

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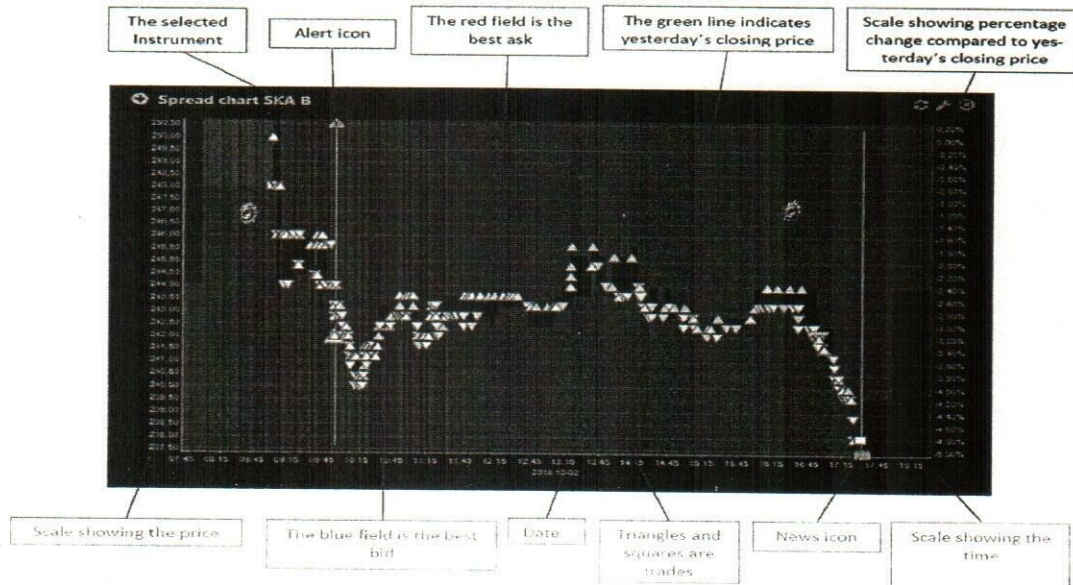
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iii. Trade monitoring screenshots of Risana Karim and her associates (public market):

IED collected Trade monitoring screenshots from Surveillance Department on some trading date(s) where appearance of active trading of Risana Karim and her associates were observed which influenced the price of GEMINISEA.

The details of the graphs are given below:



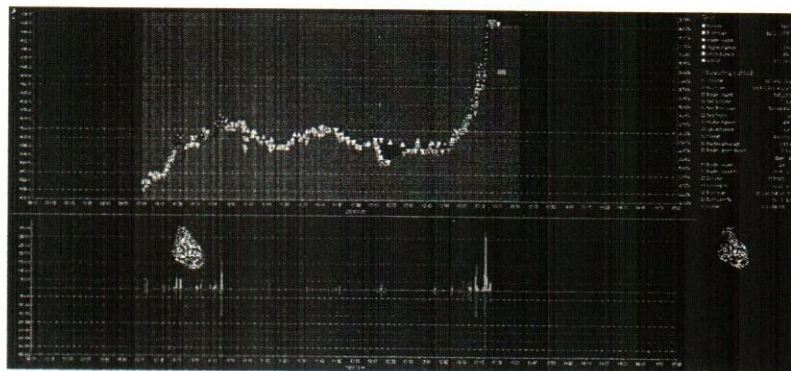
▲ Green triangle represents trade of **GEMINISEA** by Risana Karim and her associates

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

After scrutinizing the trade monitoring screenshots collected from Surveillance Department, it is found that Risana Karim and her associates were involved in trading of shares of GEMINISEA which influenced price of the said shares on several dates:

1203710043493921, 1205590043493921, 1205590075153283, 1601880075153283,
1202090065562496, 1601880043377493, 1203710046187231, 1203710061475661

29-03-2023



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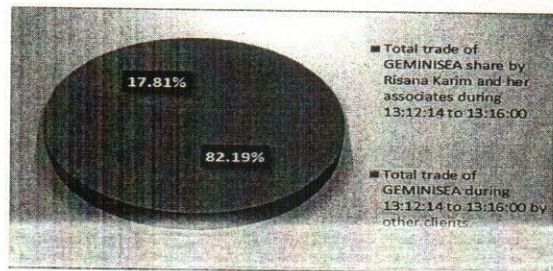
Enforcement Department

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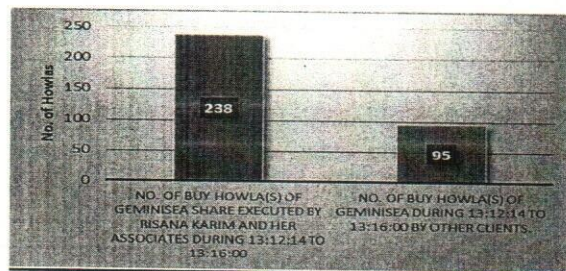
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It was observed in the above graph that on 29-03-2023, total number of trades of GEMINISEA in the market was 3369, whereas number of trades (buy) executed by Risana Karim and her associates were 740 which is approximately 21.96% of the total number of trades in the market. Again, total traded volume of GEMINISEA in the market on that day was 348,165 whereas buy volume by the said client(s) was 123,945 which is approximately 35.60% of the total traded volume in the market. It is evident that the client had significant participation in the market on 29-03-2023 in trading of GEMINISEA share.

On 29-03-2023, trading of GEMINISEA share was started at Tk. 459.90 which is Tk. 3.20 more than the YCP of Tk. 456.70. On that day, Risana Karim and her associates started series of trading at 13:12:14 at price Tk. 487.40 and induced the same to rise to Tk. 496.60 up to 13:16:00. It can also be observed from the above graph that Risana Karim and her associates executed significant trades during this time period. It is mentionable here that from 13:12:14 to 13:16:00, Risana Karim and her associates bought 57,883 shares of GEMINISEA compared to the total traded share of 70,422. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Risana Karim and her associates executed 238 howlas to purchase of shares of GEMINISEA compared to the total number of howlas of 333 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Risana Karim and her associates bought 82.19% of the total trades of GEMINISEA shares by executing 238 of total 333 howlas from 13:12:14 to 13:16:00 on 29-03-2023. From 13:12:14 to 13:16:00, Risana Karim and her associates induced the price to rise from Tk. 487.40 to Tk. 496.60. Thus it seems that Risana Karim and her associates were actively trying to lift the price of GEMINISEA share. At the end of the day price of GEMINISEA share was increased by Tk. 29.00 which is approximately 6.35% higher than YCP.

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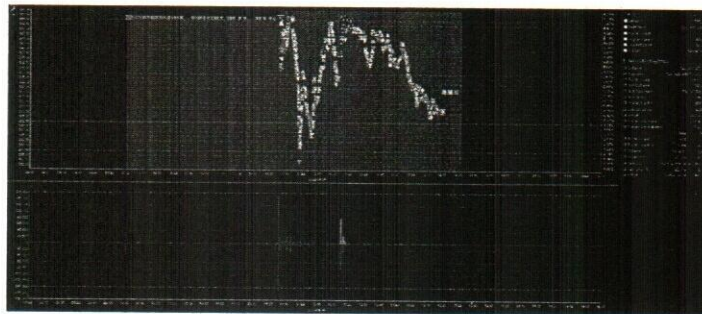
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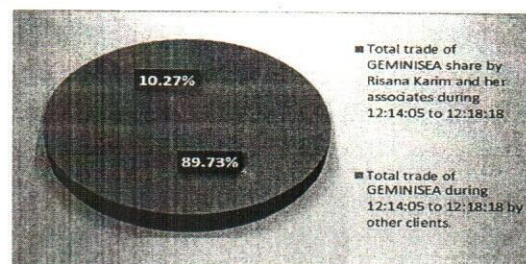
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04-04-2023

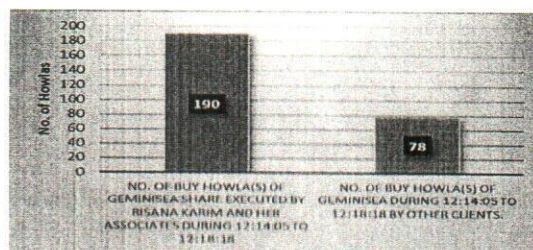


It was observed in the above graph that on 04-04-2023, total number of trades of GEMINISEA in the market was 3970, whereas number of trades (buy) executed by Risana Karim and her associates were 314 which is approximately 7.91% of the total number of trades in the market. Again, total traded volume of GEMINISEA in the market on that day was 795,378 whereas buy volume by the said client(s) was 161,831 which is approximately 20.35% of the total traded volume in the market. It is evident that the client had significant participation in the market on 04-04-2023 in trading of GEMINISEA share.

On 04-04-2023, trading of GEMINISEA share was started at Tk. 656.00 which is Tk. 45.70 more than the YCP of Tk. 610.30. On that day, Risana Karim and her associates started series of trading at 12:14:05 at price Tk. 638.80 and induced the same to rise to Tk. 656.00 up to 12:18:18. It can also be observed from the above graph that Risana Karim and her associates executed significant trades during this time period. It is mentionable here that from 12:14:05 to 12:18:18, Risana Karim and her associates bought 132,731 shares of GEMINISEA compared to the total traded share of 147,923. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Risana Karim and her associates executed 190 howlas to purchase of shares of GEMINISEA compared to the total number of howlas of 268 as shown in the following Bar Chart.



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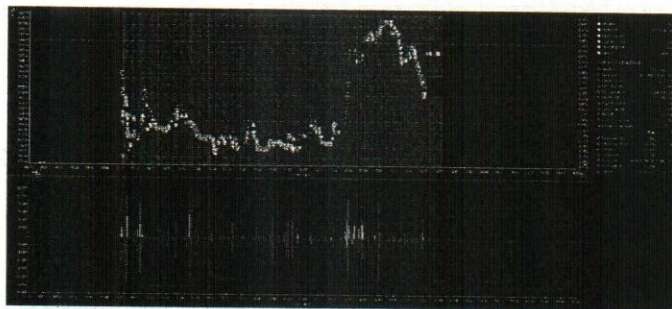
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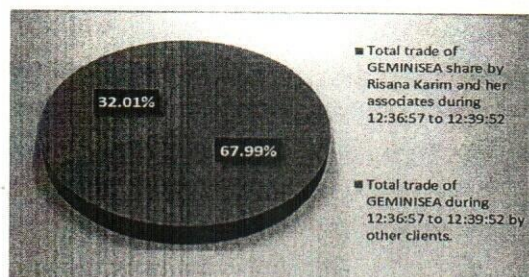
It is observed from the above graphs and screenshot that Risana Karim and her associates bought 89.73% of the total trades of GEMINISEA shares by executing 190 of total 268 howlas from 12:14:05 to 12:18:18 on 04-04-2023. From 12:14:05 to 12:18:18, Risana Karim and her associates induced the price to rise from Tk. 638.80 to Tk. 656.00. Thus it seems that Risana Karim and her associates were actively trying to lift the price of GEMINISEA share. At the end of the day price of GEMINISEA share was increased by Tk. 8.30 which is approximately 1.36% higher than YCP.

17-04-2023



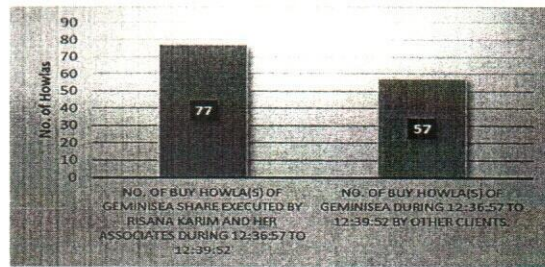
It was observed in the above graph that on 17-04-2023, total number of trades of GEMINISEA in the market was 3211, whereas number of trades (buy) executed by Risana Karim and her associates were 388 which is approximately 12.08% of the total number of trades in the market. Again, total traded volume of GEMINISEA in the market on that day was 338,185 whereas buy volume by the said client(s) was 53,169 which is approximately 15.72% of the total traded volume in the market. It is evident that the client had significant participation in the market on 17-04-2023 in trading of GEMINISEA share.

On 17-04-2023, trading of GEMINISEA share was started at Tk. 780.00 which is Tk. 23.80 more than the YCP of Tk. 756.20. On that day, Risana Karim and her associates started series of trading at 12:36:57 at price Tk. 786.10 and induced the same to rise to Tk. 798.00 up to 12:39:52. It can also be observed from the above graph that Risana Karim and her associates executed significant trades during this time period. It is mentionable here that from 12:36:57 to 12:39:52, Risana Karim and her associates bought 8,106 shares of GEMINISEA compared to the total traded share of 11,923. This is shown in the following Pie Chart.



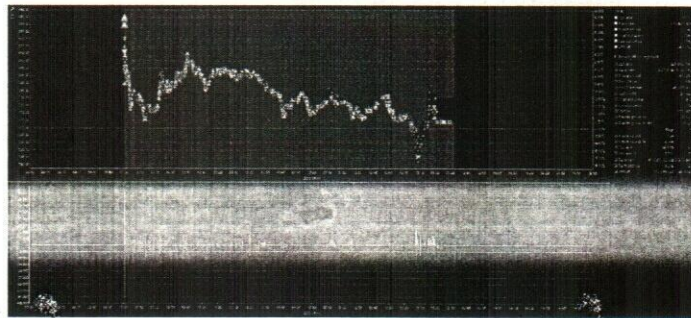
It is also found that during the aforementioned period, Risana Karim and her associates executed 77 howlas to purchase of shares of GEMINISEA compared to the total number of howlas of 134 as shown in the following Bar Chart.

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It is observed from the above graphs and screenshot that Risana Karim and her associates bought 67.99% of the total trades of GEMINISEA shares by executing 77 of total 134 howlas from 12:36:57 to 12:39:52 on 17-04-2023. From 12:36:57 to 12:39:52, Risana Karim and her associates induced the price to rise from Tk. 786.10 to Tk. 798.00. Thus it seems that Risana Karim and her associates were actively trying to lift the price of GEMINISEA share. At the end of the day price of GEMINISEA share was increased by Tk. 34.20 which is approximately 4.52% higher than YCP.

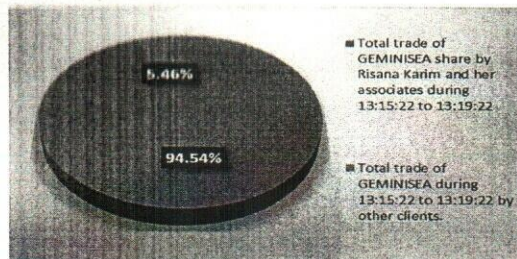
18-04-2023



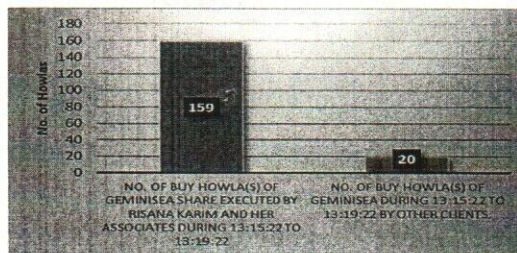
It was observed in the above graph that on 18-04-2023, total number of trades of GEMINISEA in the market was 4576, whereas number of trades (buy) executed by Risana Karim and her associates were 389 which is approximately 8.50% of the total number of trades in the market. Again, total traded volume of GEMINISEA in the market on that day was 474,303 whereas buy volume by the said client(s) was 64,155 which is approximately 13.53% of the total traded volume in the market. It is evident that the client had significant participation in the market on 18-04-2023 in trading of GEMINISEA share.

On 18-04-2023, trading of GEMINISEA share was started at Tk. 835.00 which is Tk. 44.60 more than the YCP of Tk. 790.40. On that day, Risana Karim and her associates started series of trading at 13:15:22 at price Tk. 770.00 and induced the same to rise to Tk. 786.00 up to 13:19:22. It can also be observed from the above graph that Risana Karim and her associates executed significant trades during this time period. It is mentionable here that from 13:15:22 to 13:19:22, Risana Karim and her associates bought 25,689 shares of GEMINISEA compared to the total traded share of 27,173. This is shown in the following Pie Chart.

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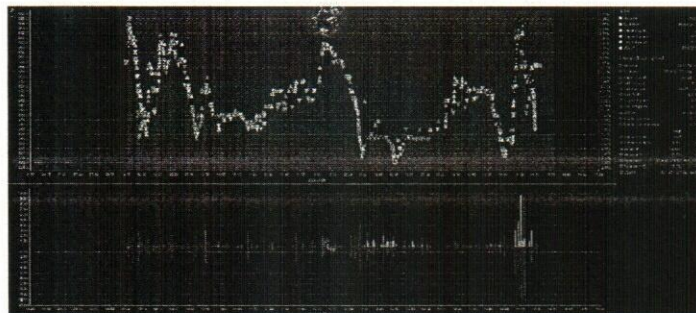


It is also found that during the aforementioned period, Risana Karim and her associates executed 159 howlas to purchase of shares of GEMINISEA compared to the total number of howlas of 179 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Risana Karim and her associates bought 94.54% of the total trades of GEMINISEA shares by executing 159 of total 179 howlas from 13:15:22 to 13:19:22 on 18-04-2023. From 13:15:22 to 13:19:22, Risana Karim and her associates induced the price to rise from Tk. 770.00 to Tk. 786.00. Thus it seems that Risana Karim and her associates were actively trying to lift the price of GEMINISEA share.

26-04-2023



It was observed in the above graph that on 26-04-2023, total number of trades of GEMINISEA in the market was 3813, whereas number of trades (buy) executed by Risana Karim and her associates were 603 which is approximately 15.81% of the total number of trades in the market. Again, total traded volume of GEMINISEA in the market on that day was 234,962 whereas buy volume by the said client(s) was 43,920 which is approximately 18.69% of the total traded volume in the market. It is evident that the client had significant participation in the market on 26-04-2023 in trading of GEMINISEA share.

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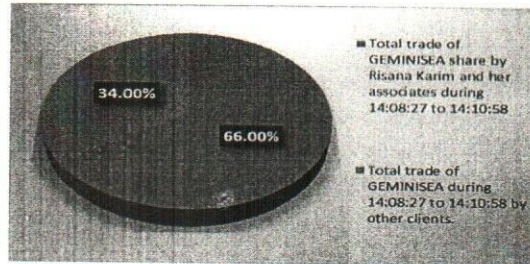
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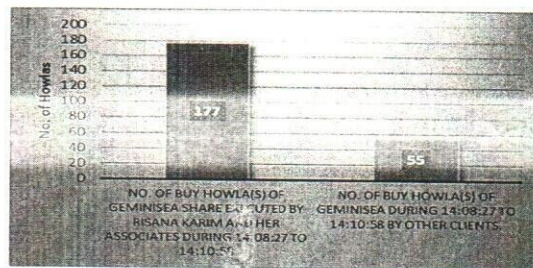
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On 26-04-2023, trading of GEMINISEA share was started at Tk. 855.90 which is similar as the YCP of Tk. 855.90. On that day, Risana Karim and her associates started series of trading at 14:08:27 at price Tk. 856.00 and induced the same to rise to Tk. 864.50 up to 14:10:58. It can also be observed from the above graph that Risana Karim and her associates executed significant trades during this time period. It is mentionable here that from 14:08:27 to 14:10:58, Risana Karim and her associates bought 16,805 shares of GEMINISEA compared to the total traded share of 25,463. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Risana Karim and her associates executed 177 howlas to purchase of shares of GEMINISEA compared to the total number of howlas of 232 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Risana Karim and her associates bought 66.00% of the total trades of GEMINISEA shares by executing 177 of total 232 howlas from 14:08:27 to 14:10:58 on 26-04-2023. From 14:08:27 to 14:10:58, Risana Karim and her associates induced the price to rise from Tk. 856.00 to Tk. 864.50. Thus it seems that Risana Karim and her associates were actively trying to lift the price of GEMINISEA share.

Summary of the trade by Risana Karim and her associates:

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
340378	680.99	231793796.00	681134	649.82	442617335.30	1359146	670.36	911119579.20	857589	668.02	572886120.20	622.58	533919350.44	501557	752.06	377200228.76

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iv). Gain and Loss by Risana Karim and her associates from 01.01.2023 to 07.05.2023

Realized Capital gain(loss)per unit	45.44	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	7.30%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	38,966,769.76	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (07-05-2023)	934.40	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	182.34	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	24.25%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	91,454,632.04	Quantity of Stock Positon x Unrealized gain (loss) per unit

As per DSE trade data, it was observed that Risana Karim and her associates bought 1,359,146 shares and sold 857,589 shares of "GEMINISEA" from public market during the period from 01.01.2023 to 07.05.2023. With the said BO accounts, Risana Karim and her associates traded 9.50% shares of "GEMINISEA" during the investigation period and realized a capital gain of Tk. 38,966,769.76 from the trading of "GEMINISEA" share during the investigation period. They also had unrealized gain of TK. 91,454,632.04 during the period.

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 Risana Karim and her associates were involved directly and indirectly in a series of transactions of **GEMINISEA** 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:

Risana Karim and her 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 "GEMINISEA" shares creating the appearance of active trading therein and raising price of the said share.



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Observations- 2:

After analyzing the trade pattern of the clients, the investigation team found that Risana Karim (BOID# 1203710043493921, 1205590075153283, 1601880075153283), Ulfat Karim (BOID# 1202090065562496), MOHAMMAD EBADUL KARIM (BOID# 1203710046187231), FATEMA SOHEL (BOID# 1203710061475661) were involved in trading of "GEMINISEA" shares by those accounts with misleading appearance of active trading on different date(s) from 01.01.2023 to 07.05.2023.

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
04/04/2023	12:09:46	280529438	GEMINISEA	142700	565.1	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Block
04/04/2023	12:10:38	280529949	GEMINISEA	9000	565.2	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Block
09/04/2023	12:42:08	280878020	GEMINISEA	300	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:08	280878021	GEMINISEA	100	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:17	280878052	GEMINISEA	140	703.4	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:26	280878127	GEMINISEA	195	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:26	280878128	GEMINISEA	300	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:26	280878129	GEMINISEA	300	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:26	280878130	GEMINISEA	300	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:26	280878131	GEMINISEA	300	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:26	280878132	GEMINISEA	105	703.8	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:40	280878188	GEMINISEA	309	704	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:40	280878189	GEMINISEA	195	704	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:46	280878233	GEMINISEA	300	704	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:46	280878234	GEMINISEA	300	704	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:42:46	280878235	GEMINISEA	300	704	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:47:22	280879671	GEMINISEA	10	703	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:51:04	280881065	GEMINISEA	1	704.9	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:51:30	280881200	GEMINISEA	1	704.9	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
09/04/2023	12:52:04	280881499	GEMINISEA	1	704.9	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
12/04/2023	13:03:10	281165343	GEMINISEA	136	657	DSEABF	3371	1203710046187231	DSENC	H0840	1202090065562496	Public
12/04/2023	13:03:10	281165344	GEMINISEA	64	657	DSEABF	3371	1203710046187231	DSENC	H0840	1202090065562496	Public
12/04/2023	13:07:45	281168251	GEMINISEA	100	654	DSEABF	3371	1203710046187231	DSENC	H0840	1202090065562496	Public
12/04/2023	13:07:45	281168252	GEMINISEA	13	654	DSEABF	3214	1203710043493921	DSENC	H0840	1202090065562496	Public
12/04/2023	13:07:45	281168253	GEMINISEA	187	654	DSEABF	3214	1203710043493921	DSENC	H0840	1202090065562496	Public
12/04/2023	13:10:54	281170739	GEMINISEA	120	650.8	DSEABF	3371	1203710046187231	DSENC	H0840	1202090065562496	Public
12/04/2023	13:11:26	281171149	GEMINISEA	200	650.8	DSEABF	3214	1203710043493921	DSENC	H0840	1202090065562496	Public
12/04/2023	13:15:47	281174494	GEMINISEA	488	654	DSEABF	3371	1203710046187231	DSENC	H0840	1202090065562496	Public
12/04/2023	13:15:47	281174495	GEMINISEA	12	654	DSEABF	3371	1203710046187231	DSENC	H0840	1202090065562496	Public
16/04/2023	10:49:55	281296771	GEMINISEA	1000	756.2	DSEUBR	11788	1205590075153283	DSEABF	3371	1203710046187231	Public
16/04/2023	10:51:46	281298169	GEMINISEA	2160	756.2	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
16/04/2023	10:53:54	281299451	GEMINISEA	1	756.2	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
17/04/2023	12:28:11	281420419	GEMINISEA	250	765	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Public
17/04/2023	12:28:55	281420960	GEMINISEA	400	775	DSEUBR	11788	1205590075153283	DSEABF	7397	1203710061475661	Public
17/04/2023	12:28:55	281420961	GEMINISEA	400	775	DSEUBR	11788	1205590075153283	DSEABF	7397	1203710061475661	Public
17/04/2023	12:28:55	281420962	GEMINISEA	400	775	DSEUBR	11788	1205590075153283	DSEABF	7397	1203710061475661	Public
17/04/2023	12:28:55	281420963	GEMINISEA	400	775	DSEUBR	11788	1205590075153283	DSEABF	7397	1203710061475661	Public
17/04/2023	12:28:55	281420964	GEMINISEA	198	775	DSEUBR	11788	1205590075153283	DSEABF	7397	1203710061475661	Public
17/04/2023	12:28:55	281420965	GEMINISEA	202	775	DSEUBR	11788	1205590075153283	DSEABF	7397	1203710061475661	Public
18/04/2023	11:17:01	281493417	GEMINISEA	105000	785	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Block
18/04/2023	11:40:13	281503754	GEMINISEA	14000	785	DSENC	H0840	1202090065562496	DSEUBR	11788	1205590075153283	Block
25/04/2023	13:54:59	281796431	GEMINISEA	8400	805	DSENC	H0840	1202090065562496	DSEMTB	10114	1601880075153283	Block
30/04/2023	14:18:35	282296844	GEMINISEA	5	812.7	DSENC	H0840	1202090065562496	DSEABF	3214	1203710043493921	Public
03/05/2023	14:18:07	282615907	GEMINISEA	500	875.6	DSEUBR	11788	1205590075153283	DSEABF	3371	1203710046187231	Public
03/05/2023	14:18:24	282616359	GEMINISEA	12000	800	DSENC	H0840	1202090065562496	DSEMTB	10114	1601880075153283	Block
03/05/2023	14:19:30	282618736	GEMINISEA	500	883	DSEUBR	11788	1205590075153283	DSEABF	3371	1203710046187231	Public

(DSE trade data)



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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 Risana Karim, Ulfat Karim, MOHAMMAD EBADUL KARIM, FATEMA SOHEL traded 302,293 shares of GEMINISEA among each other during the investigation period.

Contravention(s)-2:

Risana Karim (BOID# 1203710043493921, 1205590075153283, 1601880075153283), Ulfat Karim (BOID# 1202090065562496), MOHAMMAD EBADUL KARIM (BOID# 1203710046187231), FATEMA SOHEL (BOID# 1203710061475661) have violated the following:

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

INDIVIDUAL TRADE PATTERN

1. TRADE DETAILS OF MR. ULFAT KARIM

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

Date	Code # H0840				Total					
	BO ID # 1202090065562496									
	Ulfat Karim									
	NCCB Securities and Financial Services									
	Buy Qty	Rate (W.Avg.)	Sale Qty.	Rate (W.Avg.)	Buy Qty	Buy Rate (W.Avg.)	Total	Sale Qty.	Sale Rate (W.Avg.)	Total
28-03-2023	9999	456.87	0	0.00	9999	456.87	4568224.00	0	0.00	0.00
29-03-2023	21810	492.87	0	0.00	21810	492.87	10749447.40	0	0.00	0.00
30-03-2023	158832	528.01	0	0.00	158832	528.01	83865591.30	0	0.00	0.00
09-04-2023	12749	699.83	0	0.00	12749	699.83	8922081.90	0	0.00	0.00
11-04-2023	6048	720.08	0	0.00	6048	720.08	4355022.80	0	0.00	0.00
12-04-2023	0	0.00	22274	654.88	0	0.00	0.00	22274	654.88	14586754.70
16-04-2023	65529	755.38	0	0.00	65529	755.38	49499157.10	0	0.00	0.00
17-04-2023	11469	777.30	0	0.00	11469	777.30	8914852.10	0	0.00	0.00
18-04-2023	1951	801.54	2000	769.10	1951	801.54	1563796.60	2000	769.10	1538200.00
24-04-2023	3437	809.51	0	0.00	3437	809.51	2782272.30	0	0.00	0.00
30-04-2023	4250	812.44	0	0.00	4250	812.44	3452870.50	0	0.00	0.00
Total	296074		24274		296074			24274		

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

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance										0	0.00	0.00						
28-03-2023	9999	456.87	4568224.0	0	0.00	0.0	0	0.00	0.0	9999	456.87	4568224.0	98778	456.70	-1.17%	10.12%	0.00%	10.12%
29-03-2023	21810	492.87	10749447.4	0	0.00	0.0	0	0.00	0.0	31809	481.55	15317671.4	499595	485.70	6.35%	4.37%	0.00%	4.37%
30-03-2023	158832	528.01	83865591.3	9999	485.70	4856514.3	0	520.26	5202099.5	180642	520.26	93981163.2	1007118	528.20	8.75%	15.77%	0.99%	16.76%
02-04-2023	0	0.00	0.0	17807	502.40	8946210.7	0	520.26	9264304.9	162835	520.26	84716858.3	161203	567.80	7.50%	0.00%	11.05%	11.05%
03-04-2023	0	0.00	0.0	120495	561.04	67602277.9	0	520.26	62688966.4	42340	520.26	22027891.9	313217	610.30	7.49%	0.00%	38.47%	38.47%
04-04-2023	151700	565.11	85726570.0	7035	584.22	4110000.0	0	555.32	3906682.3	187005	555.32	103847779.6	960113	618.60	1.36%	15.80%	0.73%	16.53%
05-04-2023	0	0.00	0.0	33222	579.65	19257130.0	0	555.32	18448870.0	153783	555.32	85398909.6	360313	665.00	7.50%	0.00%	9.22%	9.22%
09-04-2023	12749	699.83	8922081.9	6760	661.72	4473203.0	0	566.38	3828753.0	159772	566.38	90492238.4	534887	687.80	-3.78%	2.38%	1.26%	3.65%
11-04-2023	6048	720.08	4355022.8	0	0.00	0.0	0	0.00	0.0	165820	571.99	94847261.2	318116	648.90	-7.50%	1.90%	0.00%	1.90%
12-04-2023	0	0.00	0.0	22274	654.88	14586754.7	0	571.99	12740489.1	143546	571.99	82106772.2	314968	654.50	0.86%	0.00%	7.07%	7.07%
13-04-2023	0	0.00	0.0	78856	659.45	52001909.6	0	571.99	45104786.1	64690	571.99	37001986.1	243696	703.50	7.49%	0.00%	32.36%	32.36%
16-04-2023	65529	755.38	49499157.1	1001	660.00	660660.0	0	664.27	664938.6	129218	664.27	85836204.5	450007	756.20	7.49%	14.56%	0.22%	14.78%
17-04-2023	11469	777.30	8914852.1	3430	700.20	2401686.0	0	673.49	2310065.1	137257	673.49	92440991.6	348005	790.40	4.52%	3.30%	0.99%	4.28%
18-04-2023	120951	785.27	94978796.6	2000	769.10	1538200.0	0	725.85	1451696.2	256208	725.85	185968091.9	601478	769.10	-2.69%	20.11%	0.33%	20.44%
24-04-2023	3437	809.51	2782272.3	4005	712.00	2851560.0	0	726.96	2911456.8	255640	726.96	185838907.4	213298	810.40	5.37%	1.61%	1.88%	3.49%
25-04-2023	8400	805.00	6762000.0	9406	752.40	7077088.0	0	729.44	6851097.3	254634	729.44	185739810.1	392826	855.90	5.61%	2.14%	2.39%	4.53%
26-04-2023	0	0.00	0.0	4200	800.00	3360000.0	0	729.44	3063641.2	250434	729.44	182676168.9	249792	855.40	-0.06%	0.00%	1.68%	1.68%
30-04-2023	4250	812.44	3452870.5	0	0.00	0.0	0	0.00	0.0	254684	730.82	186129039.4	263057	806.60	0.15%	1.62%	0.00%	1.62%
02-05-2023	0	0.00	0.0	4600	747.00	3436200.0	0	730.82	3361787.9	250084	730.82	182767251.6	256747	827.30	2.57%	0.00%	1.79%	1.79%
03-05-2023	12000	800.00	9600000.0	9000	768.49	6916400.0	0	733.99	6605917.4	253084	733.99	185761334.1	319935	870.50	5.22%	3.75%	2.81%	6.56%
07-05-2023	0	0.00	0.0	3000	808.00	2424000.0	0	733.99	2201972.5	250084	733.99	183559361.7	318327	934.40	7.34%	0.00%	0.94%	0.94%
Total	587174	637.25	374176886.0	337090	612.60	206499794.2	0	565.48	190617524.3	250084	733.99	183559361.7						

Summary of the trade by Ulfat Karim:

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.)	Qty	Price (W.Avg.)	Amount	Price (W.Avg.)	Qty	Price (W.Avg.)	Amount
291100	671.60	195503570.00	312816	608.58	190374839.50	587174	637.25	337090	612.60	206499794.20	565.48	250084	733.99	183559361.67

iii. Gain/Loss by Ulfat Karim from 01.01.2023 to 07.05.2023:

Realized Capital gain(loss)per unit	47.12	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	8.33%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	1,58,82,269.87	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (07-05-2023)	934.40	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	200.41	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	27.30%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	5,01,19,127.93	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 জুলাই ১১, ২০২৩ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪২৭(পার্ট-২)/২০২৩/৫১১ স্মারকমূলে Risana Karim and her associates (associates are Mrs. Risana Karim, Mr. Ulfat Karim, Mr. Mohammad Ebadul Karim, Mr. Md. Sohel Alam, Mrs. Fatema Sohel)-কে জুলাই ৩০, ২০২৩ তারিখে কারণ প্রদর্শন সহ শুনানিতে উপস্থিত হতে বলা হয়। নির্ধারিত তারিখে শুনানিতে Mr. Ulfat Karim এর পক্ষে Mr. Md. Al-Masum (on behalf) উপস্থিত হয়ে জুলাই ২৭, ২০২৩ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"With reference to your letter No. BSEC/Enforcement/3427(Part-2)/2023/511, Dated 11 July, 2023 on the above subject, I like to inform that, I have been maintaining a Beneficial Owner account bearing No. 1202090065562496 maintaining with NCCB Securities and Financial Services Ltd. As per Section 17(e)(v) and 17(e)(ii) of the Securities and Exchange Ordinance, 1969 the series of transactions of shares and trade of shares by creating false and misleading appearance while trading in that security are strictly prohibited. But unfortunately, I have made few transactions without knowing the restrictions of the law from the period of 01 January 2023 to 07 May 2023. 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."



Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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যেহেতু, Mr. Ulfat Karim-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 উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Mr. Ulfat Karim-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Mr. Ulfat Karim-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ও 17(e)(v) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

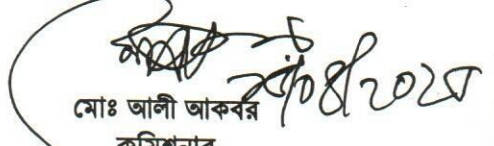
যেহেতু, Mr. Ulfat Karim-এর উপর্যুক্ত কর্মকান্ড Securities and Exchange Ordinance, 1969 এর Section 22 অনুযায়ী শাস্তিযোগ্য অপরাধ;

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

- Mr. Ulfat Karim-কে Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) ভঙ্গের দায়ে ১.০০ (এক) লক্ষ টাকা এবং Securities and Exchange Ordinance, 1969 এর Section 17(e)(v) ভঙ্গের দায়ে ১.৪০ (এক দশমিক চল্লিশ) কোটি টাকা [মোট ১.৪১ কোটি (এক কোটি একচল্লিশ লক্ষ) টাকা] অর্থদন্ড ধার্য করল যা অত্র আদেশের ৩০ (ত্রিশ) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে জমা প্রদান করতে হবে, অন্যথায় সিকিউরিটিজ আইন মোতাবেক পরবর্তী আইনানুগ ব্যবস্থা গ্রহণ করা হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মোঃ আলী আকবর
কমিশনার

বিতরণ:

- ১। Mr. Ulfat Karim
(BO ID: 1202090065562496)
Floralia, Flat # B1, House # 20,
Road # 79, Gulshan -2, Dhaka.