



BANGLADESH SECURITIES AND EXCHANGE COMMISSION

JIBON BIMA TOWER (14, 15, 16 & 20 FLOOR), 10 DILKUSHA C/A, DHAKA-1000, BANGLADESH

বিসেসি/এনফোর্সমেন্ট/২১৭৬/২০১৪/ ২৩৭

তারিখঃ ১৯ জুন ২০১৬ ইং

আদেশ

তু, কমিশন, SR Capital Limited (সিএসই টিআরইসি নং-০৩৮) কে তার আবেদনক্রমে, নির্ধারিত শর্তাধীনে সিকিউরিটিজ ত্রয়য় কর্মকন্ড পরিচালনা করার জন্য 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' (অতঃপর 'কমিশন' বলে উল্লিখিত) 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' আইন, ১৯৯৩ (১৯৯৩ সনের ১৫ নং আইন) এর ১০(১) এ প্রদত্ত ক্ষমতাবলে সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক-ডিলার, স্টক-ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ৫(৫) সহ পঠিত স্টকব্রোকার/ডিলার লাইসেন্স সার্টিফিকেট প্রদান করেছে;

তু, কমিশন এর আদেশ নং SEC/SRI/INS/CSE-MEM/2010/875 dated June 11, 2013 এর মাধ্যমে SR Capital Limited এ পরিদর্শনের জন্য একটি কমিটি গঠিত হয় এবং উক্ত পরিদর্শন কমিটির দাখিলকৃত প্রতিবেদন অনুযায়ী findings and contraventions নিম্নরূপ:

Surveillance department provided a list of short sale generated by automated surveillance system BSEC. Inspection Team collected relevant documents from S R Capital Ltd. to examine whether short sale genuinely took place in those account or not. After examination, it is found that S R Capital Ltd. was involved in short selling to the following BO accounts:

MASUK MIAH (BO ID- 1203550046717871 Account No. 56741)

Documents	Sale Date	Sale Qty	Holding of previous Day of selling shares (DP A6)	Share credit status on selling date (DP49) or Buy information (transaction ledger) of same script on T-3 or T-0 (for trading on spot market)	Sellable Quantity	Short Sell Quantity
TAS SAS	30/05/2013	3500	0	0	0	3500

SHAMEEM AHMED (BO ID- 1203550048415624 Account No.84190)

Documents	Sale Date	Sale Qty	Holding of previous Day of selling shares (DP A6)	Share credit status on selling date (DP49) or Buy information (transaction ledger) of same script on T-3 or T-0 (for trading on spot market)	Sellable Quantity	Short Sell Quantity
NGALW TL	20/05/2013	600	200	200	200	400



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D. BABUL HOSSAIN (BO ID- 1203550046710182 Account No.56738)

ments	Sale Date	Sale Qty	Holding of previous Day of selling shares (DP A6)	Share credit status on selling date (DP49) or Buy information (transaction ledger) of same script on T-3 or T-0 (for trading on spot market)	Sellable Quantity	Short Sell Quantity
JNA L	13/05/2013	200	0	0	0	200
JNA L	14/05/2013	800	0	0	0	800
TRO JM	14/05/2013	4000	900	900	900	4000
TRO JM	16/05/2013	1000	900	900	900	100
FAB TO	30/05/2013	2900	0	0	0	2900

BANU DEBNATH (BO ID- 1203550039463721 Account No.77157)

ments	Sale Date	Sale Qty	Holding of previous Day of selling shares (DP A6)	Share credit status on selling date (DP49) or Buy information (transaction ledger) of same script on T-3 or T-0 (for trading on spot market)	Sellable Quantity	Short Sell Quantity
CON HA	20/05/2013	6000	5500	5500	5500	500
SFIN	29/05/2013	1000	594	843	843	157

MD. YASIN (BO ID- 1203550047061867 Account No.56808)

ments	Sale Date	Sale Qty	Holding of previous Day of selling shares (DP A6)	Share credit status on selling date (DP49) or Buy information (transaction ledger) of same script on T-3 or T-0 (for trading on spot market)	Sellable Quantity	Short Sell Quantity
IMS STMF	21/05/2013	1000	0	0	0	1000
ELTAS PINN	21/05/2013	300	0	0	0	300

Violation: Through the aforesaid activities, S R Capital Ltd. violated regulation 4(1) of the Chittagong Stock Exchange (Short-Sale) Regulations, 2005 and বিধি ১১ of সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক ডিলার, ষ্টক ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ by allowing short sale facilities to the clients without complying the regulation.



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The Inspection officers found that S R Capital Ltd. provided credit facilities to MD. SIDDIQUR RAHMAN (Director of S.R Capital Ltd.) on various dates. Some of which are given below:

MD. SIDDIQUR RAHMAN

Client Code # 0032, Designation: Director

Date	Closing Ledger Balance
09-05-2012	-335,498.05
10-05-2012	-596,799.68
14-05-2012	-593,828.43
15-05-2012	-641,380.41
16-05-2012	-776,557.79
20-05-2012	-1,021,499.40
13-06-2012	-2,132,021.40
14-06-2012	-2,186,908.29
26-06-2012	-1,703,861.82
27-06-2012	-1,657,750.59
28-06-2012	-1,025,844.60
02-07-2012	-2,196,283.43
04-07-2012	-2,502,146.19
05-07-2012	-2,502,585.06
08-07-2012	-2,477,148.81
09-07-2012	-2,677,247.81
11-07-2012	-2,368,616.26
12-07-2012	-1,631,960.04
15-07-2012	-1,978,424.05
16-07-2012	-2,068,949.80
18-07-2012	-2,069,549.80
22-07-2012	-2,079,875.55
23-07-2012	-2,079,875.55
24-07-2012	-1,379,800.16
26-07-2012	-1,378,655.30
28-07-2012	-1,379,155.30
29-07-2012	-1,029,112.61
30-07-2012	-1,247,356.87
01-08-2012	-1,564,347.37
02-08-2012	-1,755,965.23
05-08-2012	-2,177,717.00
08-08-2012	-2,510,227.31
12-08-2012	-2,384,243.06
14-08-2012	-2,930,284.76
29-08-2012	-2,703,852.26
30-08-2012	-2,517,818.51
03-09-2012	-968,864.98
04-09-2012	-962,945.99
06-09-2012	-1,226,603.52
10-09-2012	-957,777.27
01-01-2013	-1,040,332.79
02-01-2013	-1,182,186.54
03-01-2013	-1,564,439.81
09-01-2013	-1,611,029.82
10-01-2013	-1,831,806.39
13-01-2013	-1,982,170.67
14-01-2013	-2,413,746.93
15-01-2013	-1,938,978.69
16-01-2013	-1,804,386.18
17-01-2013	-1,949,683.52



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MD. SIDDIQUR RAHMAN + MRS. SALMA RAHMAN

Client Code # 00256, Designation: Director

Date	Closing Ledger Balance
20-03-2012	-352,743.54
12-04-2012	-199,064.44
03-05-2012	-88,055.51

Contravention: Through the aforesaid activities S R Capital Ltd. violated SEC Directive No. SEC/CMRRCD/2001-43/51 dated July 22, 2010 by utilizing loan facilities to their Director.

03. In case of the following clients, the said stock-broker extended credit facilities to purchase shares of the listed "Z" category companies (Non-Marginable Securities):

A. MD. SANA ULLAH, CLIENT CODE # 00002

Date	Transaction type	Script name	Qty.	Rate	Amount used to buy	Opening Ledger Balance	Closing Ledger Balance
27.02.13	Buy	LAFSURCEM	10,000	33.83	3,38,343.76	216,817.28	-121,526.48
28.02.13	Buy	LAFSURCEM	10,000	32.78	3,27,817.50	-121,526.48	-449,343.98
03.03.13	Buy	LAFSURCEM	10,000	32.98	3,29,822.51	-449,343.98	-779,166.49
04.03.13	Buy	LAFSURCEM	5,000	33.08	1,65,412.50	-779,166.49	-944,578.99

B. SHAMSUDDIN AHMED AND MD. SAIFUL ISLAM , CLIENT CODE # 05939

Date	Transaction type	Script name	Qty.	Rate	Amount used to buy	Opening Ledger Balance	Closing Ledger Balance
16.04.12	Buy	LAFSURCEM	2,500	39.56	98,893.03	-149,147.43	-248,040.46
18.04.13	Buy	LAFSURCEM	5,500	39.21	2,15,666.17	-169,644.85	-385,311.02
12.09.12	Buy	LAFSURCEM	2,000	33.90	67,803.75	-175,994.93	-246,123.23



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C. MD. SIDDIQUR RAHMAN, Director of S.R Capital Ltd., CLIENT CODE # 00032

Date	Transaction type	Script name	Qty.	Rate	Amount used to buy	Opening Ledger Balance	Closing Ledger Balance
10.01.13	Buy	BEACONPHA	5,000	15.24	76,190.00	-1,611,029.82	-1,831,806.39

D. SURETUM NESSA KHANAM, CLIENT CODE # 05939

Date	Transaction type	Script name	Qty.	Rate	Amount used to buy	Opening Ledger Balance	Closing Ledger Balance
15.05.13	Buy	BSC	580	319.49	1,85,306.94	50,442.54	-22,106.04
12.06.13	Buy	BSC	275	413.27	1,13,647.92	-118,876.33	-167,634.55

Contravention: Through the aforesaid activities S R Capital Ltd. violated SEC Directive No. SEC/CMRRCD/2001-43/169 dated October 01, 2009 by extending credit facilities to purchase shares of the listed "Z" category companies (Non-Marginable Securities)

04. It appears from the transaction ledgers and portfolio statements of MD. SIDDIQUR RAHMAN (Director of S.R Capital Ltd.) that S.R Capital Ltd. allowed withdrawal of money from the Customers Consolidated Bank Account in spite of negative balance in the account (ACCOUNT TYPE:**CASH/NON-MARGIN**, As per SEC Directive No. SEC/CMRRCD/2001-43/51 dated July 22, 2010), which are shown in the following tables:

MD. SIDDIQUR RAHMAN, Director of S.R Capital Ltd.,

CLIENT CODE # 00032, ACCOUNT TYPE: CASH/ NON-MARGIN

Sl. No.	Date	Transaction type	Amount	Opening Ledger Balance	REMARKS
1	15.05.12	Payment	55,000.00	-593,828.43	MD. SIDDIQUR RAHMAN (Director of S.R Capital Ltd.) used money from the deposits of the clients
1	27.06.12	Payment	500,000.00	-1,703,861.82	

Contravention: Through the aforesaid activities S R Capital Ltd. violated Rule 8A of the Securities and Exchange Rules, 1987 & সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক ডিলার, স্টক ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ১১ দ্রষ্টব্য এর দ্বিতীয় তফসিল (১) by not maintaining the Consolidated Customer Account for the purpose of dealing money only for the deposit of the money received from and for, any payment of money to and for customers.



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05. Financial Statement Analysis:

After examining the Audited Financial Report of S R Capital Ltd. for the year ended on June 30, 2012 and for the year ended on June 30, 2011 the following observation was found in the Audited Financial Report:

- A. The Payable amount to Clients was Tk. 24,948,996.39 as per statement of back-office software as on June 30, 2012 whereas the amount of Tk. 10,885,030.00 as the Sundry Creditors (The Payable amount to Creditors) was reported in the Audited Financial Statement as on June 30, 2012, as a result the Payable amount to Clients was understated by the difference amount of Tk. - **14,063,966.39**, which are shown in the following tables:

Sl.	Particulars	Balance as on June 30,2012
A.	Sundry Creditors (As per Note. 06 of the Accounts For the Year Ended June 30,2012)	10,885,030.00
B.	Payable amount to Clients (as per statement of back-office software)	24,948,996.39
C.	Difference (A-B)	-14,063,966.39

3. The Receivable amount from Clients was Tk. 14,542,559.82 as per statement of back-office software as on June 30, 2012 whereas the amount of Tk. 48,303,095 as the Sundry Debtors (The Receivable amount from sundry Clients to Maintain the margin rule) was reported in the Audited Financial Statement as on June 30, 2012, as a result the Receivable amount from Clients was overstated by the difference amount of Tk. **33,760,535.18**, which are shown in the following tables:

Sl.	Particulars	Balance as on June 30,2012
A.	Sundry Debtors (As per Note. 04 of the Accounts For the Year Ended June 30,2012)	48,303,095.00
B.	Receivable amount from sundry Clients (as per statement of back-office software)	14,542,559.82
C.	Difference (A-B)	33,760,535.18



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C. S R Capital Ltd. provided credit facilities to different clients. Total accounts receivables was **48,303,095.00** (As per Note. 04 of the audited financial statement) for the year ended June 30, 2012, but they don't shows any **interest income** in their audited financial statement.

D. Total accounts receivables was **48,303,095.00** (As per Note. 04 of the audited financial statement) for the year ended June 30, 2012. The said stock-broker submitted a written Statement of " Fund source of margin loan given to the clients" stating, among others that:

"All of Directors are provided fund as margin loan for the client."

But, no records were found regarding "payable to directors" in the Statement of Financial Position as at June 30, 2012.

E. An income from FDR interest of Tk. **10, 07,524.00** was reported in the statement of profit & Loss for the year ended June 30, 2011, whereas no FDR amount was shown in the Statement of Financial Position As at June 30, 2011.

Contravention: Through the aforesaid activities S R Capital Ltd. violated the following Securities related Laws:

- i) সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক ডিলার, স্টক ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ১১।
- i) Rule 8 of the Securities and Exchange Rules, 1987 which is the violation of 5(1) of the Securities and Exchange Rules, 1987.
- ii) Section 18 of the Securities and Exchange Ordinance, 1969 by providing incorrect documents to the inspecting officers.

06. After checking of the relevant documents of the following clients collected from S R Capital Ltd., some mismatch were found between DPA6 and Port Folio Statement, which are shown in the following tables:



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A. Client Code: 56738

Client Name: Md. Babul Hossain

Date	Script name	Share Holding Position of DPA6	Share Holding Position of Port Folio Statement	Buy information (Transaction Ledger) during T-3 (For A,B,N) T-0(For Spot) T-9 (For Z)	No. of Mismatched Share
12.05.13	AFTABAUTO	0	2,900	0	(2,900)
	JAMUNAOIL	0	1,000	0	(1,000)
	LAFSURCEM	138,000	536,000	0	(398,000)
	MPETROLEUM	900	5,000	0	(4,100)
	NAVANACNG	0	4,800	0	(4,800)
	NBL	0	20,000	0	(20,000)
14.05.13	AFTABAUTO	0	2,900	0	(2,900)
	LAFSURCEM	138,000	536,000	0	(398,000)
	MPETROLEUM	900	1,000	0	(100)
	NAVANACNG	0	4,800	0	(4,800)
16.05.13	AFTABAUTO	0	2,900	0	(2,900)
	LAFSURCEM	138,000	536,000	0	(398,000)
	NAVANACNG	0	4,800	0	(4,800)
30.05.13	LAFSURCEM	138,000	536,000	0	(398,000)
	NAVANACNG	0	4,800	0	(4,800)

B. Client Code: 56741

Client Name: Masuk Miah

Date	Script name	Share Holding Position of DPA6	Share Holding Position of Port Folio Statement	Buy information (Transaction Ledger) during T-3 (For A,B,N) T-0(For Spot) T-9 (For Z)	No. of Mismatched Share
29.05.13	TITASGAS	0	3,750	0	(3,750)



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09.01.12	<u>SUMITPOWER</u>	5,000	0	0	5,000
	<u>MICEMENT</u>	0	37,300	0	(37,300)
	<u>ACTIVEFINE</u>	1,100	0	0	1,100
	<u>BEXIMCO</u>	5,000	0	0	5,000
	<u>OCEANCONTAIN</u>	100	0	0	100
	<u>POPULAR1MF</u>	20,500	0	0	20,500
	<u>SUMITPOWER</u>	5,000	0	0	5,000
	<u>MICEMENT</u>	0	37,300	0	(37,300)
18.01.12	<u>ACTIVEFINE</u>	1,100	0	0	1,100
	<u>BEXIMCO</u>	5,000	0	0	5,000
	<u>OCEANCONTAIN</u>	100	0	0	100
	<u>POPULAR1MF</u>	20,500	0	0	20,500
	<u>MICEMENT</u>	0	37,300	0	(37,300)
19.03.12	<u>ACTIVEFINE</u>	100	0	0	100
	<u>BEDL</u>	10,400	0	0	10,400
	<u>BEXIMCO</u>	5,000	0	0	5,000
	<u>MICEMENT</u>	32,255	71,300	0	(39,045)
	<u>MALEKSPIN</u>	2,000	0	0	2,000
	<u>OCEANCONTAIN</u>	100	0	0	100
	<u>POPULAR1MF</u>	20,500	0	0	20,500
	<u>PHPMF1</u>	48,500	105,000	0	(56,500)
02.09.12	<u>BEDL</u>	1,000	0	0	1,000
	<u>LANKABAFIN</u>	4,500	0	0	4,500
	<u>MALEKSPIN</u>	2,000	0	0	2,000
	<u>MICEMENT</u>	39,725	71,100	0	(31,375)
	<u>POPULAR1MF</u>	19,000	0	0	19,000
09.10.12,	<u>LANKABAFIN</u>	4,500	0	0	4,500
10.10.12	<u>MICEMENT</u>	34,123	0	0	34,123
& 11.10.12	<u>POPULAR1MF</u>	19,000	0	0	19,000



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E. Client Code: 84190

Client Name: Shameem Ahmed

Date	Script name	Share Holding Position of DPA6	Share Holding Position of Port Folio Statement	Buy information (Transaction Ledger) during T-3 (For A,B,N) T-0(For Spot) T-9 (For Z)	No. of Mismatched Share
29.05.13	BENGALWTL	200	600	0	(400)

F. Client Code: 02

Client Name: Md.Sana Ullah

Script name	02.04.2012			03.04.2012			04.04.2012		
	Share Holding Position of DPA6	Share Holding Position of Port Folio Statement	No. of Mismatched Share	Share Holding Position of DPA6	Share Holding Position of Port Folio Statement	No. of Mismatched Share	Share Holding Position of DPA6	Share Holding Position of Port Folio Statement	No. of Mismatched Share
ABBANK	500	0	500	500	0	500	500	0	500
ACTIVEFINE	1,075	0	1,075	1,075	0	1,075	1,075	0	1,075
AGNISYS	94	0	94	94	0	94	94	0	94
AIBL1STIME	500	0	500	500	0	500	500	0	500
AIMS1STMF	175	0	175	175	0	175	175	0	175
ALARABANK	392	0	392	392	0	392	392	0	392
AMBEEPHA	60	0	60	60	0	60	60	0	60
ANLIMAYARN	300	0	300	300	0	300	300	0	300
APEXWEAV	40	0	40	40	0	40	40	0	40
ASIAINS	1,125	0	1,125	1,125	0	1,125	1,125	0	1,125
BDTHAI	30	0	30	30	0	30	30	0	30
BXPHARMA	11,900	0	11,900	11,900	0	11,900	11,900	0	11,900
BXSYNTH	640	0	640	640	0	640	640	0	640
BRACBANK	2	0	2	2	0	2	2	0	2
DAFODILCOM	197	0	197	197	0	197	197	0	197
DESCO	22	0	22	22	0	22	22	0	22
DHAKABANK	500	0	500	500	0	500	500	0	500



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ECABLES	60	0	60	60	0	60	60	0	60
EASTLAND	100	0	100	100	0	100	100	0	100
EXIMBANK	192	0	192	192	0	192	192	0	192
1JANATAMF	500	0	500	500	0	500	500	0	500
GOLDENSON	500	0	500	500	0	500	500	0	500
GREENDELMF	200,500	0	200,500	200,500	0	200,500	199,000	0	199,000
IBBLPBOND	40	0	40	40	0	40	40	0	40
IFIC	230	0	230	230	0	230	230	0	230
INTECH	165	0	165	165	0	165	165	0	165
IPDC	50	0	50	50	0	50	50	0	50
ISLAMIBANK	2,020	0	2,020	2,020	0	2,020	2,020	0	2,020
ISLAMICFIN	30	0	30	30	0	30	30	0	30
JAMUNABANK	60	0	60	60	0	60	60	0	60
JAMUNAOIL	240	0	240	240	0	240	240	0	240
JANATAINS	80	0	80	80	0	80	80	0	80
KAY&QUE	20	0	60	20	0	60	20	0	60
KPCL	118	0	240	118	0	240	118	0	240
KOHINOOR	50	0	80	50	0	80	50	0	80
LAFSURCEML	29,000	0	29,000	28,000	0	28,000	25,500	0	25,500
LEGACYFOOT	6,500	0	6,500	6,500	0	6,500	6,500	0	6,500
MAKSONSPIN	500	0	500	500	0	500	500	0	500
MPETROLEUM	242	0	242	242	0	242	242	0	242
MERCINS	1,100	0	1,100	1,100	0	1,100	1,100	0	1,100
MJLBD	4,000	0	4,000	4,000	0	4,000	4,000	0	4,000
MONNOFEB	5,000	0	5,000	5,000	0	5,000	5,000	0	5,000
MTBL	120	0	120	120	0	120	120	0	120
NBL	11,099	0	11,099	11,099	0	11,099	11,099	0	11,099
NAVANACNG	224	0	224	224	0	224	224	0	224
NCCBANK	1,201	0	1,201	1,201	0	1,201	1,201	0	1,201
ONEBANKLTD	3,170	0	3,170	3,170	0	3,170	4,121	0	4,121
PADMACEM	3,000	0	3,000	3,000	0	3,000	3,000	0	3,000
PARAMOUNT	250	0	250	250	0	250	250	0	250
PEOPLESINS	2,885	0	2,885	2,885	0	2,885	2,885	0	2,885
PLFSL	1,023	0	1,023	1,023	0	1,023	1,023	0	1,023
PRIMEBANK	500	0	500	500	0	500	500	0	500
PRIME1ICBA	1,000	0	1,000	1,000	0	1,000	1,000	0	1,000
PRIMEFIN	40	0	40	40	0	40	40	0	40



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PRIMEINSUR	312	0	312	312	0	312	312	0	312
PROVATIINS	2,000	0	2,000	2,000	0	2,000	2,000	0	2,000
PUBALIBANK	4,941	0	4,941	4,941	0	4,941	4,941	0	4,941
QSM DRYCELL	12	0	12	12	0	12	12	0	12
RAKCERAMIC	1,040	0	1,040	1,040	0	1,040	1,040	0	1,040
RELIANCINS	185	0	185	185	0	185	185	0	185
REPUBLIC	650	0	650	650	0	650	650	0	650
SALAMCRST	290	0	290	290	0	290	290	0	290
SALVOCHEM	19,750	0	19,750	19,750	0	19,750	19,750	0	19,750
SANDHANINS	4	0	4	4	0	4	4	0	4
SHAHJABANK	3,775	0	3,775	3,775	0	3,775	3,775	0	3,775
SINGERBD	27	0	27	27	0	27	27	0	27
SIBL	143	0	143	143	0	143	143	0	143
SONARBAINS	120	0	120	120	0	120	120	0	120
SONARGAON	50	0	50	50	0	50	50	0	50
SOUTHEASTB	320	0	320	320	50,000	(49,680)	320	50,000	(49,680)
SQURPHARMA	40	0	40	40	0	40	40	0	40
STANDBANKL	240	0	240	240	0	240	240	0	240
SAPORTL	5	0	5	5	0	5	5	0	5
TAKAFULINS	4,520	0	4,520	4,520	0	4,520	4,520	0	4,520
TALLUSPIN	5	0	5	5	0	5	5	0	5
CITYBANK	210	0	210	210	0	210	210	0	210
IBNSINA	750	0	750	750	0	750	750	0	750
PREMIERBAN	7,458	0	7,458	7,458	0	7,458	7,458	0	7,458
TRUSTBANK	800	0	800	800	0	800	800	0	800
UCBL	-	-	-	213	0	213	213	0	213
UNITEDAIR	-	-	-	10,000	0	10,000	10,000	0	10,000
UTTARABANK	-	-	-	-	-	-	1,502	0	1,502

Contravention: Through the aforesaid activities S R Capital Ltd. violated the following Securities related Laws:

- সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক ডিলার, স্টক ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ১১ দ্রষ্টব্য এর দ্বিতীয় তফসিল (১)।
- Rules 8(cc) of the Securities and Exchange Rules, 1987** for not maintaining accurate and up to date customer Ledger.



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- iii. Section 18 of the Securities and Exchange Ordinance, 1969 by providing incorrect documents to the inspecting officers.

07. S R Capital Ltd. has deducted as a portfolio management fees Tk.11, 505/23 in the year 2011, Tk.3, 648/40 in the year 2012 and Tk.685/67 in the year 2013 from the clients which is illegal because S R Capital Ltd. cannot deduct fees from client account as port folio management fees. It appears that S R Capital Ltd. engaged with the clients Investment advisory services.

Contravention: S R Capital Ltd. violated সিকিউরিটিজ ও এক্সচেঞ্জ কমিশন (স্টক ডিলার, স্টক ব্রোকার ও অনুমোদিত প্রতিনিধি) বিধিমালা, ২০০০ এর বিধি ১১ দ্রষ্টব্য এর দ্বিতীয় তফসিল (১) ও (৪) by deducting portfolio management fees from the clients without consent of BSEC.

08. The said stock-broker submitted statement of Branch-wise work stations to the Inspection officers. the irregularities of the statement were given below:-

Sl. No.	Branch Name	Present No. of Work Stations	Minimum Approved No. of Work Stations
1.	Nabigonj Br.	01	02
2.	Borolekha Br.	01	02

Contravention: Through the aforesaid activities S R Capital Ltd. violated Para 2(d) of SEC Directives No. SEC/CMRRCD/2002-90/34 dated July 29, 2008 by not maintaining Minimum Approved No. of Work Stations.

SR Capital Limited এর লিখিত বক্তব্য কমিশনের বিবেচনায় গ্রহণযোগ্য হয়নি, যা সিকিউরিটিজ আইন পরিপালনে ব্যর্থতা বিধায় section 22 of the Securities and Exchange Ordinance, 1969 অনুযায়ী শাস্তিযোগ্য অপরাধ এবং যা ক্ষমার অযোগ্য;

যেহেতু, কমিশনের বিবেচনায়, সিকিউরিটিজ আইন পরিপালনে উল্লিখিত ব্যর্থতার জন্য, তথা পুঁজিবাজারের উন্নয়নের পাশাপাশি বাজারের শৃংখলা ও স্বচ্ছতা রক্ষার স্বার্থে উক্ত ব্রোকার/ডিলার কে জরিমানা করা প্রয়োজন ও সমীচীন;

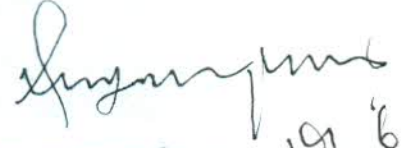


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অতএব, সেহেতু, কমিশন, উল্লিখিত যাবতীয় বিষয় বিবেচনাপূর্বক, Securities and Exchange Ordinance, 1969 (Ordinance No. XVII of 1969) এর section 22 [যা The Securities and Exchange (Amendment) Act, 2000 দ্বারা সংশোধিত] এ প্রদত্ত ক্ষমতাবলে SR Capital Limited এর উপর ১০ (দশ) লক্ষ টাকা জরিমানা ধার্য্য করল যা অত্র আদেশের তারিখ হতে ১৫ (পনের) দিনের মধ্যে 'বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশন' এর অনুকূলে ইস্যুকৃত ব্যাংক ড্রাফট/পে-অর্ডারের মাধ্যমে কমিশনে জমা করতে হবে।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের আদেশক্রমে,


মো: আ: সালাম সিকদার
কমিশনার

১৭.৬.১৬

বিতরণঃ

✓ এস.আর. ক্যাপিটাল লিমিটেড
আনন্দ টাওয়ার (৪র্থ তলা)
উত্তর ধোপা দিঘীর পাড়
জেল রোড, সিলেট