

Bangladesh Securities and Exchange Commission

Enforcement Division

Enforcement Department

Market, Market Intermediaries and Other Affairs Section

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বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬২৯

তারিখঃ এপ্রিল ২২, ২০২৫

Shatrong Agro Fisheries Ltd.

(BOID: 1201950064845550, 1205660064845550

and 1602170064845550)

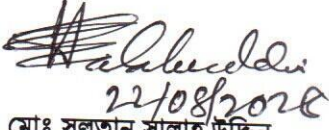
Vill: Chakrampur, PO: Chakrampur

Trishal, Maymenhsing..

বিষয়: আদেশ।

কমিশনের আদেশ নং- বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬২৮ তারিখঃ এপ্রিল ২২, ২০২৫ এর সত্যায়িত অনুলিপি আপনার অবগতি ও প্রয়োজনীয় ব্যবস্থা গ্রহণের জন্য এতদসঙ্গে সংযুক্ত করা হলো।

বাংলাদেশ সিকিউরিটিজ অ্যান্ড এক্সচেঞ্জ কমিশনের পক্ষে,



মোঃ সুলতান সালাহ উদ্দিন

উপপরিচালক (এনফোর্সমেন্ট)

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

ই-মেইল- ssuddin@sec.gov.bd

অবগতির জন্য অনুলিপি:

১. চেয়ারম্যান মহোদয়ের দপ্তর, বিএসইসি।
২. পিও টু সকল কমিশনার, বিএসইসি।
৩. পিও টু নির্বাহী পরিচালক, এনফোর্সমেন্ট, বিএসইসি।
৪. পিও টু নির্বাহী পরিচালক, এমআইএস, বিএসইসি।
৫. পিও টু নির্বাহী পরিচালক, এমআইএডি, বিএসইসি।
৬. পিও টু পরিচালক, এনফোর্সমেন্ট, বিএসইসি।

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নং-বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৬২৮

তারিখঃ এপ্রিল ২২, ২০২৫

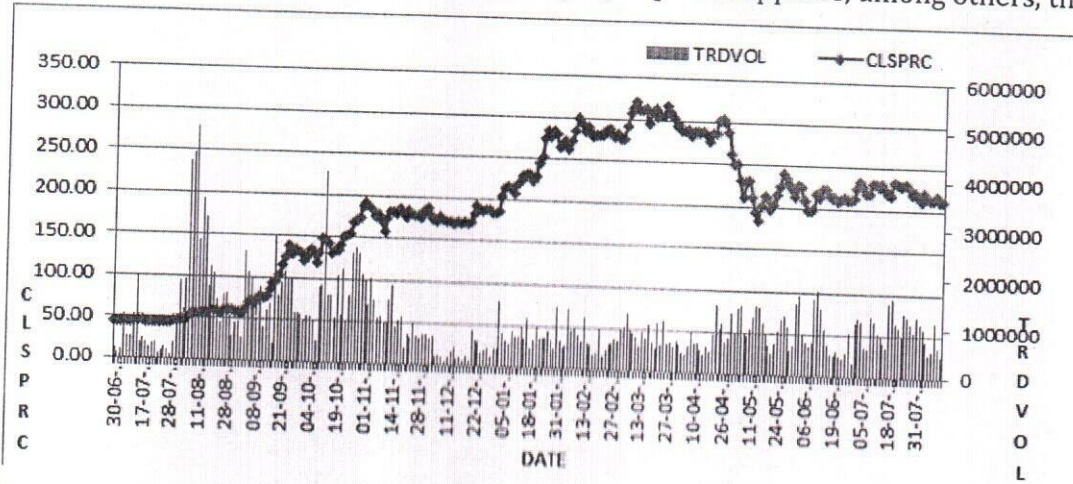
আদেশ

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, আগস্ট ২৩, ২০২৩ ও আগস্ট ২৪, ২০২৩ তারিখের কমিশনের অনুসন্ধান (Enquiry) আদেশ নং BSEC/IE & ID/Enquiry/2023/08/111 এবং BSEC/IE & ID/Enquiry/2023/08/114 দ্বারা প্রদত্ত ক্ষমতাবলে কমিশন Sea Pearl Beach Resort and Spa Limited (SEAPEARL) এর শেয়ার লেনদেনে সম্ভাব্য মূল্যকানসাজি সম্পর্কে অনুসন্ধানকার্যক্রম পরিচালনা করেছে এবং কমিশনে এ সংক্রান্ত একটি প্রতিবেদন দাখিল করেছে। অনুসন্ধান প্রতিবেদন থেকে অন্যান্যের মধ্যে নিম্নলিখিত বিষয়গুলি উপস্থাপিত হয়:

Description of alleged violation of securities laws:

Whereas, pursuant to Commission's Enquiry Order No. BSEC/IE & ID/Enquiry/2023/08/111 dated August 23, 2023 and Commission's Enquiry Order No. BSEC/IE & ID/Enquiry/2023/08/114 dated August 24, 2023 the Commission formed an enquiry committee to enquire regarding the possible price manipulation activities of the share of Sea Pearl Beach Resort and Spa Limited (SEAPEARL) by the parties including individuals, stock brokers, stock dealer, and institutions; identification of the Insider Trading of the said company and all other relevant issues. The enquiry committee enquired share trading of Sea Pearl Beach Resort and Spa Limited (SEAPEARL) for the period from 01.07.2022 to 10.08.2023 and prepared a report. From the enquiry report it appears, among others, that:



The Yesterday Closing Price (YCP) change in the price of SEAPEARL shares from 01/07/2022 to 10/08/2023 has been substantial. The details are as follows:

- The opening price of SEAPEARL shares on 01/07/2022 was Tk. 43.70.
- The closing price of SEAPEARL shares on 10/08/2023 was Tk. 211.00.

During this period:

- The price of SEAPEARL shares increased by Tk. 167.30.

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- This represents an impressive YCP increase of approximately 382.84% compared to the closing price on 30.06.2022.

This significant percentage increase indicates substantial market movement and investor interest in SEAPEARL shares during the specified period.

Mr. Loutful Goni Titu and His Associates:

It is apparent that the identified group of clients seems to be under the influence or leadership of a common beneficiary, namely M Loutful Goni Titu, Managing Director of Shatrong Agro Fisheries Limited.

While pursuing the mode of identification, the enquiry team notices some similar features among this group of clients on the basis of which the aforesaid clients are associated in the following manners:

SL	BOID	Client Code	Client's Name	Name of Depository Participant	Remarks
1	1201950064845550	43305	Shatrong Agro Fisheries Ltd.	EBL Securities Limited	Managing Director of Shatrong Agro Fisheries Limited; M Loutful Goni Titu is the brother of KAMRUL HASAN Md. IQBAL Goni.
2	1205660064845550	1754	Shatrong Agro Fisheries Ltd.	Trust Bank Securities Limited	
3	1602170064845550	5636	Shatrong Agro Fisheries Ltd.	Mercantile Bank Securities Limited	
4	1201570073660878	19456	KAMRUL HASAN Md. IQBAL Goni	SCL Securities Ltd.	
5	1201570073611471	19436	Md. Abu Nayeem	SCL Securities Ltd.	Md. Abu Nayeem signs as witness in the Margin Agreement signed between the Broker house and Shatrong Agro Fisheries Limited.
6	1201570074234392	19578	Ridoy Poultry Firm	SCL Securities Ltd.	1. All these Enterprises bearing trade licenses in the serial order from the same UNION PARISHAD .
7	1201570074232417	19583	Hasan Nursery	SCL Securities Ltd.	
8	1201570074232152	19582	Amanat Agro Fisheries	SCL Securities Ltd.	
9	1201570074232516	19584	Sabbir Store	SCL Securities Ltd.	2. As per MOA of Shatrong Agro Fisheries Limited and Trade Licenses of all these enterprises has the same address- Chakrampur, Trishal .
10	1201570074231696	19581	Sarker Agro Farm	SCL Securities Ltd.	
11	1201570074232706	19586	Mukta Fisheries	SCL Securities Ltd.	

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Observations:

a. Individual Trade Pattern of "Loutful Goni Titu and his Associates":

Date	Code # 43305				Code # 1754				Code # 5636				Code # 19456				Code # 19436				Code # 19578			
	BO ID # 1201950064845550				BO ID # 1205660064845550				BO ID # 1602170064845550				BO ID # 1201570073660878				BO ID # 1201570073611471				BO ID # 1201570074234392			
	Shatrong Agro Fisheries Limited				Shatrong Agro Fisheries Limited				Shatrong Agro Fisheries Limited				KAMRUL HASAN Md. IQBAL Goni				md. Abu Nayeem				Ridoy Poultry Firm			
	EBL Securities Limited				Trust Bank Securities Limited				Mercantile Bank Securities Limited				SCL Securities Ltd.				SCL Securities Ltd.				SCL Securities Ltd.			
	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate
07-08-2022	500000	52.99	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
08-08-2022	500399	54.54	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
10-08-2022	0	0.00	2865	55.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
11-08-2022	0	0.00	637534	54.73	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
14-08-2022	835000	55.78	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-09-2022	0	0.00	139793	58.82	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
11-09-2022	0	0.00	135652	72.16	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
22-09-2022	0	0.00	23000	123.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-10-2022	371343	147.08	259881	146.10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
16-10-2022	82477	145.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
17-10-2022	0	0.00	50000	132.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
18-10-2022	0	0.00	10000	134.20	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	0	0.00
19-10-2022	0	0.00	3000	135.10	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
20-10-2022	100400	139.33	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-10-2022	0	0.00	30000	153.75	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
25-10-2022	50750	154.59	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-10-2022	51104	162.15	30000	168.07	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-10-2022	36756	170.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
30-10-2022	550233	170.83	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
31-10-2022	101046	187.65	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-11-2022	0	0.00	45000	188.54	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
03-11-2022	0	0.00	452257	186.59	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
06-11-2022	170912	175.48	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
07-11-2022	20000	176.85	25408	177.01	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
08-11-2022	7081	173.52	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
09-11-2022	36795	167.56	18409	169.31	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
10-11-2022	13651	163.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
13-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	40000	182.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-11-2022	0	0.00	158000	177.85	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
21-11-2022	22811	176.36	23000	175.97	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
23-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
24-11-2022	0	0.00	0	0.00	0	0.00	0	0.00	10000	180.52	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
27-11-2022	0	0.00	0	0.00	67360	180.69	0	0.00	91300	181.80	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	4000	177.88	0	0.00
28-11-2022	0	0.00	0	0.00	44200	175.95	0	0.00	12000	179.32	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-11-2022	49910	181.80	0	0.00	50000	183.80	0	0.00	13600	183.60	0	0.00	0	0.00	0	0.00	5280	175.65	0	0.00	0	0.00	0	0.00
30-11-2022	3960	187.01	5000	183.39	60000	186.40	0	0.00	42500	186.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
01-12-2022	0	0.00	0	0.00	5000	178.70	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	4000	185.58
04-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
05-12-2022	0	0.00	870	175.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	5200	172.88	0	0.00	0	0.00	0	0.00
06-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
14-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
15-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
18-12-2022	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	10000	171.70	0	0.00
19-12-2022	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	350	172.30	0	0.00
20-12-2022	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	1000	171.90	0	0.00
21-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
22-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
26-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	100	191.30	0	0.00	0	0.00	0	0.00
27-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
28-12-2022	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
29-12-2022	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	42225	187.42	0	0.00
																					16699	186.58	0	0.00

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Code # 19583				Code # 19582				Code # 19584				Code # 19581				Code # 19586				Total							
BO ID # 1201570074232417				BO ID # 1201570074232152				BO ID # 1201570074232516				BO ID # 1201570074231696				BO ID # 1201570074232706											
Hasan nursery				Amanat Agro Fisharise				Sabbir Store				Sarker Agro Farm				Mukta Fisharise											
SCL Securities Ltd.				SCL Securities Ltd.				SCL Securities Ltd.				SCL Securities Ltd.				SCL Securities Ltd.											
Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Rate	Sale Qty.	Rate	Buy Qty	Buy Rate	Total	Sale Qty.	Sale Rate	Total		
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	2865	55.60	159294.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	637534	54.73	34891555.20
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	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	139793	58.82	8222572.50
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	135652	72.16	9787987.50
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	23000	123.00	2829000.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	259881	146.10	37968183.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	50000	132.00	6600030.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	10000	134.20	1342000.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	3000	135.10	405300.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	30000	153.75	4612625.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	30000	168.07	5041978.60
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	45000	188.54	8484389.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	452257	186.59	84384435.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	25408	177.01	4497555.80
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	18409	169.31	3116835.30
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
29516	179.39	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	158000	177.85	28100446.60
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	23000	175.97	4047240.00
0	0.00	29500	181.60	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	29500	181.60	5357200.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	9000	184.37	1659290.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	10055	172.25	1731951.10
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	870	175.60	152772.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	2764	170.99	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	4576	169.47	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	23175	171.96	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
31556	175.88	0	0.00	42756	175.59	0	0.00	0	0.00	0	0.00	0	0.00	50	170.80	0	0.00	0	0.00	0	0.00	0	0.00	0.00	0	0.00	0.00
0	0.00	0	0																								

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

b. Effects of "SEAPEARL" at DSE by "Loutful Goni Titu and his associates": (Both Public & Block Market)
Opening Balance: 27,045,528

Date	Buy			Sale			Bonus Share Credited	Cost of shares sold		Stock Position			Comparison with the Market					
	Qty.	Price	Amount	Qty.	Price	Amount		Price (W.Avg.)	Amount	Qty.	Price (W.Avg.)	Amount	Mkt Trade Qty at DSE	Mkt Close Price at DSE	Market price Changed by	Client Buy (%)	Client Sale (%)	Client Trade (%)
Opening Balance																		
07-08-2022	500000	52.99	26497450.00	0	0.00	0.00		0.00	0.00	500000	52.99	26497450.00	4758135	53.00	9.96%	10.51%	0.00%	10.51%
08-08-2022	500399	54.54	27293213.50	0	0.00	0.00		0.00	0.00	1000399	53.77	53790663.50	4498583	56.40	6.42%	11.12%	0.00%	11.12%
10-08-2022	0	0.00	0.00	2865	55.60	159294.00		53.77	154048.79	997534	53.77	53636614.71	4846980	55.60	-1.42%	0.00%	0.06%	0.06%
11-08-2022	0	0.00	0.00	637534	54.73	34891555.20		53.77	34279699.26	360000	53.77	19356915.45	2779965	53.80	-3.24%	0.00%	22.93%	22.93%
14-08-2022	835000	55.78	46575927.00	0	0.00	0.00		0.00	0.00	1195000	55.17	65932842.45	3577978	57.20	6.32%	23.34%	0.00%	23.34%
16-08-2022	800000	55.20	44160000.00	0	0.00	0.00		0.00	0.00	1995000	55.18	110092842.45	3968405	57.70	0.87%	20.16%	0.00%	20.16%
28-08-2022	880025	55.80	49105395.00	100000	56.20	5619999.20		55.37	5537281.85	2775025	55.37	153660955.60	3479367	60.30	1.69%	25.29%	2.87%	28.17%
31-08-2022	0	0.00	0.00	250001	55.00	13750055.00		55.37	13843259.99	2525024	55.37	139817695.61	1217838	58.80	-2.81%	0.00%	20.53%	20.53%
01-09-2022	0	0.00	0.00	139793	58.82	8222572.50		55.37	7740732.41	2385231	55.37	132076963.20	884818	58.70	-0.17%	0.00%	15.80%	15.80%
05-09-2022	0	0.00	0.00	20000	56.80	1136000.00		55.37	1107456.37	2365231	55.37	130969506.83	2665350	62.70	9.81%	0.00%	0.75%	0.75%
11-09-2022	0	0.00	0.00	135652	72.16	9787987.50		55.37	7511433.57	2229579	55.37	123458073.25	1321840	73.70	7.43%	0.00%	10.26%	10.26%
18-09-2022	0	0.00	0.00	10000	94.00	940000.00		55.37	553728.18	2219579	55.37	122904345.07	473076	94.00	9.94%	0.00%	2.11%	2.11%
22-09-2022	0	0.00	0.00	23000	123.00	2829000.00		55.37	1273574.83	2196579	55.37	121630770.24	2007441	125.20	9.63%	0.00%	1.15%	1.15%
13-10-2022	1492343	143.90	214746847.90	1379382	142.29	196266566.00		91.19	125780168.75	2309540	91.19	210597449.39	7166954	146.90	-0.47%	20.82%	19.25%	40.07%
16-10-2022	82477	145.60	12008384.80	0	0.00	0.00		0.00	0.00	2392017	93.06	222605834.19	1490536	142.20	-3.20%	5.53%	0.00%	5.53%
17-10-2022	0	0.00	0.00	50000	132.00	6600030.00		93.06	4653098.92	2342017	93.06	217952735.28	1450210	131.50	-7.52%	0.00%	3.45%	3.45%
18-10-2022	0	0.00	0.00	10000	134.20	1342000.00		93.06	930619.78	2332017	93.06	217022115.49	925852	134.20	2.05%	0.00%	1.08%	1.08%
19-10-2022	0	0.00	0.00	43100	137.61	5931080.00		93.06	4010971.27	2288917	93.06	213011144.23	2262407	135.10	0.67%	0.00%	1.91%	1.91%
20-10-2022	100400	139.33	13988342.30	199997	125.00	24999625.00		95.01	19000917.96	2189320	95.01	207998568.56	1189284	139.60	3.33%	8.44%	16.82%	25.26%
23-10-2022	300000	135.00	40500000.00	0	0.00	0.00		0.00	0.00	2489320	99.83	248498568.56	2808577	150.60	7.88%	10.68%	0.00%	10.68%
24-10-2022	0	0.00	0.00	30000	153.75	4612625.00		99.83	2994776.51	2459320	99.83	245503792.06	961272	153.10	1.66%	0.00%	3.12%	3.12%
25-10-2022	50750	154.59	7845236.90	50000	150.00	7500000.00		100.93	5046652.66	2460070	100.93	248302376.29	1837458	154.80	1.11%	2.76%	2.72%	5.48%
26-10-2022	51104	162.15	8286569.40	100100	149.81	14996178.60		102.18	10228105.84	2411074	102.18	246360839.85	2858310	168.70	8.98%	1.79%	3.50%	5.29%
27-10-2022	536756	168.84	90627829.20	0	0.00	0.00		0.00	0.00	2947830	114.32	336988669.05	3049412	169.00	0.18%	17.60%	0.00%	17.60%
30-10-2022	550233	170.83	93996345.00	25000	160.00	4000000.00		123.21	3080169.04	3473063	123.21	427904845.01	2426182	173.70	2.78%	22.68%	1.03%	23.71%
31-10-2022	101046	187.65	18961387.50	100510	165.50	16634070.00		125.03	12566635.50	3473599	125.03	434299597.01	2082485	188.00	8.23%	4.85%	4.83%	9.68%
01-11-2022	100000	180.10	18010000.00	45000	188.54	8484389.00		126.57	5695639.57	3528599	126.57	446613957.45	2311337	190.40	1.28%	4.33%	1.95%	6.27%
03-11-2022	0	0.00	0.00	452257	186.59	84384435.00		126.57	57242063.65	3076342	126.57	389371893.80	2010269	184.30	-1.71%	0.00%	22.50%	22.50%
06-11-2022	170912	175.48	29991321.80	0	0.00	0.00		0.00	0.00	3247254	129.14	419363215.60	2215627	174.70	-5.21%	7.71%	0.00%	7.71%
07-11-2022	120001	187.39	22487147.10	25408	177.01	4497555.80		131.22	3334031.43	3341847	131.22	438516331.26	1035839	176.80	1.20%	11.58%	2.45%	14.04%
08-11-2022	7081	173.52	1228710.70	0	0.00	0.00		0.00	0.00	3348928	131.31	439745041.96	1007159	169.20	-4.30%	0.70%	0.00%	0.70%
09-11-2022	36795	167.56	6165353.20	18409	169.31	3116835.30		131.70	2424523.35	3367314	131.70	443485871.81	876095	158.50	-6.32%	4.20%	2.10%	6.30%
10-11-2022	13651	163.70	2234713.00	0	0.00	0.00		0.00	0.00	3380965	131.83	445720584.81	883393	174.30	9.97%	1.55%	0.00%	1.55%
13-11-2022	198000	187.73	37170000.00	0	0.00	0.00		0.00	0.00	3578965	134.92	482890584.81	1612623	181.30	4.02%	12.28%	0.00%	12.28%
14-11-2022	50000	189.00	9450000.00	0	0.00	0.00		0.00	0.00	3628965	135.67	492340584.81	1822038	182.50	0.66%	2.74%	0.00%	2.74%
15-11-2022	0	0.00	0.00	158000	177.85	28100446.60		135.67	21435812.25	3470965	135.67	470904772.56	805993	180.40	-1.15%	0.00%	19.60%	19.60%
21-11-2022	22811	176.36	4023041.90	23000	175.97	4047240.00		135.94	3126514.04	3470776	135.94	471801300.42	334774	176.10	-1.62%	6.81%	6.87%	13.68%
23-11-2022	34371	179.44	6167477.00	0	0.00	0.00		0.00	0.00	3505147	136.36	477968777.42	613037	179.80	-2.49%	5.61%	0.00%	5.61%
24-11-2022	14000	179.76	2516700.00	0	0.00	0.00		0.00	0.00	3519147	136.53	480485477.42	864196	177.60	-1.22%	1.62%	0.00%	1.62%
27-11-2022	158660	181.33	28769340.00	29500	181.60	5357200.00		138.47	4084775.82	3648307	138.47	505170041.60	635770	178.50	0.51%	24.96%	4.64%	29.60%
28-11-2022	61480	176.58	10856068.50	0	0.00	0.00		0.00	0.00	3709787	139.10	516026110.10	547693	175.90	-1.46%	11.23%	0.00%	11.23%
29-11-2022	113510	182.90	20760821.10	59999	176.67	10599823.00		140.40	8423797.34	3763298	140.40	528363133.86	991251	183.80	4.49%	11.45%	6.05%	17.50%
30-11-2022	197460	182.39	36014346.00	9000	184.37	1659290.00		142.49	1202430.62	3951758	142.49	563095049.24	731938	187.10	1.80%	26.98%	1.23%	28.21%
01-12-2022	5000	178.70	893521.30	0	0.00	0.00		0.00	0.00	3956758	142.54	563988570.54	691189	178.40	-4.65%	0.72%	0.00%	0.72%
04-12-2022	0	0.00	0.00	40055	175.06	7011951.10		142.54	5709361.60	3916703	142.54	558279208.94	629388	173.70	-2.63%	0.00%	6.36%	6.36%
05-12-2022	0	0.00	0.00	870	175.60	152772.00		142.54	124008.10	3915033	142.54	558155200.84	191490	172.50	-0.69%	0.00%	0.45%	0.45%

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06-12-2022	8375	176.83	1480913.80	30000	176.00	5280000.00		142.61	4278336.79	3894208	142.61	555357777.85	263830	177.10	2.67%	3.17%	11.37%	14.55%
14-12-2022	4264	170.32	726224.10	0	0.00	0.00		0.00	0.00	3898472	142.64	556084001.95	156484	172.20	1.35%	2.72%	0.00%	2.72%
15-12-2022	12764	171.55	2189603.00	0	0.00	0.00		0.00	0.00	3911236	142.74	558273604.95	163814	169.80	-1.39%	7.79%	0.00%	7.79%
18-12-2022	4926	169.67	835814.70	0	0.00	0.00		0.00	0.00	3916162	142.77	559109419.65	203782	172.30	1.47%	2.42%	0.00%	2.42%
19-12-2022	24175	171.96	4157113.00	0	0.00	0.00		0.00	0.00	3940337	142.95	563266532.65	205144	169.80	-1.45%	11.78%	0.00%	11.78%
20-12-2022	50	170.80	8540.00	0	0.00	0.00		0.00	0.00	3940387	142.95	563275072.65	114367	171.90	1.24%	0.04%	0.00%	0.04%
21-12-2022	81312	175.56	14275528.00	0	0.00	0.00		0.00	0.00	4021699	143.61	577550600.65	1059747	182.50	6.17%	7.67%	0.00%	7.67%
22-12-2022	15100	189.91	2867630.00	0	0.00	0.00		0.00	0.00	4036799	143.78	580418230.65	1258808	190.70	4.49%	1.20%	0.00%	1.20%
26-12-2022	8000	189.86	1518900.00	26000	180.85	4702000.00		143.87	3740696.48	4018799	143.87	578196434.17	978443	186.60	-2.15%	0.82%	2.66%	3.47%
27-12-2022	14825	182.26	2702067.50	0	0.00	0.00		0.00	0.00	4033624	144.01	580898501.67	266749	186.40	-0.11%	5.56%	0.00%	5.56%
28-12-2022	50520	187.39	9467045.80	5120	170.00	870400.00		144.55	740099.17	4079024	144.55	589625448.30	353766	186.70	0.16%	14.28%	1.45%	15.73%
29-12-2022	16699	186.58	3115751.70	0	0.00	0.00		0.00	0.00	4095723	144.72	592741200.00	553780	186.70	0.00%	3.02%	0.00%	3.02%
04-01-2023	82441	196.84	16227917.90	28322	189.15	5357179.50		145.75	4127943.12	4149842	145.75	604841174.77	1579012	202.80	9.92%	5.22%	1.79%	7.01%
09-01-2023	0	0.00	0.00	16689	215.73	3600371.20		145.75	2432428.60	4133153	145.75	602408746.17	512717	212.00	-0.93%	0.00%	3.26%	3.26%
11-01-2023	0	0.00	0.00	30000	200.10	6003000.00		145.75	4372512.31	4103153	145.75	598036233.86	1665114	218.30	5.41%	0.00%	1.80%	1.80%
12-01-2023	0	0.00	0.00	65000	215.73	14022500.00		145.75	9473776.68	4038153	145.75	588562457.18	839048	223.00	2.15%	0.00%	7.75%	7.75%
15-01-2023	0	0.00	0.00	12801	213.91	2738215.00		145.75	1865751.00	4025352	145.75	586696706.18	1083167	227.60	2.06%	0.00%	1.18%	1.18%
16-01-2023	0	0.00	0.00	180	231.80	41724.00		145.75	26235.07	4025172	145.75	586670471.10	667706	229.80	0.97%	0.00%	0.03%	0.03%
19-01-2023	12999	203.50	2645296.50	0	0.00	0.00		0.00	0.00	4038171	145.94	589315767.60	1841712	228.30	2.51%	0.71%	0.00%	0.71%
22-01-2023	0	0.00	0.00	13000	234.62	3050100.00		145.94	1897172.01	4025171	145.94	587418595.59	1111662	245.00	7.31%	0.00%	1.17%	1.17%
23-01-2023	0	0.00	0.00	9000	248.90	2240120.00		145.94	1313426.77	4016171	145.94	586105168.82	883813	253.00	3.27%	0.00%	1.02%	1.02%
24-01-2023	0	0.00	0.00	50000	260.00	13000000.00		145.94	7296815.41	3966171	145.94	578808353.41	812064	273.70	8.18%	0.00%	6.16%	6.16%
26-01-2023	0	0.00	0.00	5500	281.48	1548114.70		145.94	802649.70	3960671	145.94	578005703.72	783785	275.10	-3.07%	0.00%	0.70%	0.70%
30-01-2023	0	0.00	0.00	5000	279.81	1399060.80		145.94	729681.54	3955671	145.94	577276022.18	459459	280.10	-1.13%	0.00%	1.09%	1.09%
31-01-2023	440074	270.36	118980002.20	438901	269.52	118293239.90		158.39	69518924.63	3956844	158.39	626737099.74	1873665	263.50	-5.93%	23.49%	23.42%	46.91%
01-02-2023	0	0.00	0.00	68930	269.39	18569300.00		158.39	10918041.82	3887914	158.39	615819057.92	855142	269.20	2.16%	0.00%	8.06%	8.06%
02-02-2023	0	0.00	0.00	4371	253.36	1107421.00		158.39	692336.59	3883543	158.39	615126721.33	979436	271.00	0.67%	0.00%	0.45%	0.45%
05-02-2023	141050	278.12	39228810.00	140450	277.89	39029242.00		162.59	22835659.25	3884143	162.59	631519872.08	903688	261.60	-3.47%	15.61%	15.54%	31.15%
06-02-2023	104000	268.56	27930000.00	256975	268.25	68933637.10		165.35	42491488.11	3731168	165.35	616958383.97	1932953	272.10	4.01%	5.38%	13.29%	18.67%
07-02-2023	0	0.00	0.00	139999	269.60	37743729.00		165.35	23149200.68	3591169	165.35	593809183.29	1671846	284.40	4.52%	0.00%	8.37%	8.37%
08-02-2023	300000	265.10	79530000.00	50625	278.00	14073750.00		173.04	8760297.01	3840544	173.04	664578886.28	1555248	298.90	5.10%	19.29%	3.26%	22.54%
09-02-2023	0	0.00	0.00	19050	277.76	5291400.00		173.04	3296467.32	3821494	173.04	661282418.96	792796	293.00	-1.97%	0.00%	2.40%	2.40%
12-02-2023	0	0.00	0.00	10000	288.69	2886874.00		173.04	1730429.04	3811494	173.04	659551989.92	715743	283.40	-3.28%	0.00%	1.40%	1.40%
15-02-2023	0	0.00	0.00	1000	277.45	277445.00		173.04	173042.90	3810494	173.04	659378947.02	573827	276.70	-2.16%	0.00%	0.17%	0.17%
19-02-2023	100000	278.00	27800000.00	4000	280.68	1122700.00		175.73	702907.56	3906494	175.73	686476039.46	527297	279.10	0.11%	18.96%	0.76%	19.72%
22-02-2023	0	0.00	0.00	9000	281.61	2534517.70		175.73	1581542.01	3897494	175.73	684894497.46	450978	285.10	1.93%	0.00%	2.00%	2.00%
23-02-2023	0	0.00	0.00	9400	288.14	2708520.00		175.73	1651832.76	3888094	175.73	683242664.69	573494	287.80	0.95%	0.00%	1.64%	1.64%
26-02-2023	0	0.00	0.00	16940	287.99	4878547.00		175.73	2976813.51	3871154	175.73	680265851.19	704429	280.70	-2.47%	0.00%	2.40%	2.40%
27-02-2023	0	0.00	0.00	18000	276.69	4980404.00		175.73	3163084.01	3853154	175.73	677102767.18	722688	277.30	-1.21%	0.00%	2.49%	2.49%
28-02-2023	50000	282.10	14104983.60	70700	281.02	19868146.00		177.09	12520230.56	3832454	177.09	678687520.22	900763	281.40	1.48%	5.55%	7.85%	13.40%
01-03-2023	0	0.00	0.00	16354	280.09	4580520.00		177.09	2896122.36	3816100	177.09	675791397.86	903752	276.30	-1.81%	0.00%	1.81%	1.81%
02-03-2023	0	0.00	0.00	21000	274.80	5770761.10		177.09	3718880.36	3795100	177.09	672072517.50	985233	275.20	-0.40%	0.00%	2.13%	2.13%
05-03-2023	48003	274.87	13194524.60	0	0.00	0.00		0.00	0.00	3843103	178.31	685267042.10	3046347	290.60	5.60%	1.58%	0.00%	1.58%
06-03-2023	0	0.00	0.00	20000	296.79	5935805.00		178.31	3566217.41	3823103	178.31	681700824.69	1691460	306.00	5.30%	0.00%	1.18%	1.18%
07-03-2023	0	0.00	0.00	16400	314.90	5164439.80		178.31	2924298.28	3806703	178.31	678776526.41	1564610	313.30	2.39%	0.00%	1.05%	1.05%
09-03-2023	0	0.00	0.00	12000	316.80	3801613.20		178.31	2139730.45	3794703	178.31	676636795.96	822159	320.10	2.17%	0.00%	1.46%	1.46%
12-03-2023	0	0.00	0.00	18000	313.28	5639055.00		178.31	3209595.67	3776703	178.31	673427200.28	740580	311.80	-2.59%	0.00%	2.43%	2.43%
13-03-2023	0	0.00	0.00	3900	310.95	1212710.00		178.31	695412.40	3772803	178.31	672731787.89	543444	311.60	-0.06%	0.00%	0.72%	0.72%
16-03-2023	3394	308.20	1046023.80	0	0.00	0.00		0.00	0.00	3776197	178.43	673777811.69	1625237	308.20	4.30%	0.21%	0.00%	0.21%
23-03-2023	0	0.00	0.00	19991	315.58	6300054.30		178.43	3566946.38	3756206	178.43	670210865.31	1499564	316.90	4.21%	0.00%	1.33%	1.33%
27-03-2023	0	0.00	0.00	23000	300.68	7099554.40		178.43	4103035.07	3733206	178.43	666107030.24	581648	308.50	-2.65%	0.00%	3.95%	3.95%
29-03-2023	2000	299.75	599500.00	0	0.00	0.00		0.00	0.00	3735206	178.49	666706530.24	511444	293.50	-3.07%	0.39%	0.00%	0.39%
06-04-2023	0	0.00	0.00	1000	282.00	282000.00		178.49	178492.57	3734206	178.49	666528037.67	725665	281.20	-2.56%	0.00%	0.14%	0.14%
09-04-2023	95001	271.00	25745271.00	0	0.00	0.00		0.00	0.00	3829207	180.79	692273308.67	1010600	287.70	2.31%	9.40%	0.00%	9.40%
17-04-2023	0	0.00	0.00	3717	282.96	1061711.00		180.79	671907.67	3825490	180.79	691601321.00	499386	285.60	3.29%	0.00%	0.74%	0.74%

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18-04-2023	0	0.00	0.00	2500	292.00	730000.00		180.79	451969.11	3822990	180.79	691149351.89	866731	285.90	0.11%	0.00%	0.29%	0.29%
24-04-2023	83800	296.62	24856430.00	0	0.00	0.00		0.00	0.00	3906790	183.27	716005781.89	1563852	301.80	5.56%	5.36%	0.00%	5.36%
25-04-2023	21600	306.81	6627098.80	0	0.00	0.00		0.00	0.00	3928390	183.95	722632880.69	1183857	303.50	0.56%	1.82%	0.00%	1.82%
03-05-2023	200000	251.17	50234866.70	194146	250.88	48707775.20		187.21	36345689.65	3934244	187.21	736522057.74	861399	250.60	0.32%	23.22%	22.54%	45.76%
08-05-2023	0	0.00	0.00	4539	214.26	972522.20		187.21	849737.24	3929705	187.21	735672320.50	1417238	210.10	-8.49%	0.00%	0.32%	0.32%
11-05-2023	0	0.00	0.00	800	217.07	173653.00		187.21	149766.42	3928905	187.21	735522554.08	1040602	211.30	-8.09%	0.00%	0.08%	0.08%
25-05-2023	144334	236.00	34063257.90	0	0.00	0.00		0.00	0.00	4073239	188.94	769585811.98	1213665	240.20	7.33%	11.89%	0.00%	11.89%
12-06-2023	0	0.00	0.00	40791	210.68	8594034.60		188.94	7706931.72	4032448	188.94	761878880.26	1984457	212.60	-2.34%	0.00%	2.06%	2.06%
10-07-2023	227000	217.00	49259000.00	0	0.00	0.00		0.00	0.00	4259448	190.43	811137880.26	2291924	230.30	5.74%	9.90%	0.00%	9.90%
17-07-2023	0	0.00	0.00	218000	220.00	47960000.00		190.43	41514313.10	4041448	190.43	769623567.16	836513	219.00	-2.28%	0.00%	26.06%	26.06%
18-07-2023	320000	217.40	69568000.00	0	0.00	0.00		0.00	0.00	4361448	192.41	839191567.16	2431898	217.40	-0.73%	13.16%	0.00%	13.16%
19-07-2023	20000	229.25	4585000.00	0	0.00	0.00		0.00	0.00	4381448	192.58	843776567.16	1742776	231.90	6.67%	1.15%	0.00%	1.15%
20-07-2023	37964	231.49	8788318.90	0	0.00	0.00		0.00	0.00	4419412	192.91	852564886.06	1156848	231.50	-0.17%	3.28%	0.00%	3.28%
24-07-2023	69427	228.54	15867072.20	0	0.00	0.00		0.00	0.00	4488839	193.46	868431958.26	857524	228.80	0.04%	8.10%	0.00%	8.10%
25-07-2023	286328	236.37	67678140.80	0	0.00	0.00		0.00	0.00	4775167	196.04	936110099.06	1616227	230.80	0.87%	17.72%	0.00%	17.72%
26-07-2023	34779	234.76	8164697.50	0	0.00	0.00		0.00	0.00	4809946	196.32	944274796.56	1247600	227.40	-1.47%	2.79%	0.00%	2.79%
30-07-2023	46718	220.36	10294893.20	0	0.00	0.00		0.00	0.00	4856664	196.55	954569689.76	1079483	220.00	0.50%	4.33%	0.00%	4.33%
01-08-2023	5450	209.35	1140976.60	10500	207.73	2181189.30		196.56	2063909.24	4851614	196.56	953646757.13	1133351	210.20	-1.73%	0.48%	0.93%	1.41%
02-08-2023	907939	210.55	191167171.50	505075	209.87	10599225.00		198.77	100392668.49	5254478	198.77	1044421260.13	2018400	220.90	5.09%	44.98%	25.02%	70.01%
03-08-2023	9632	217.65	2096358.60	0	0.00	0.00		0.00	0.00	5264110	198.80	1046517618.73	746428	214.70	-2.81%	1.29%	0.00%	1.29%
06-08-2023	57759	213.97	12358712.60	0	0.00	0.00		0.00	0.00	5321869	198.97	1058876331.33	577169	213.60	-0.51%	10.01%	0.00%	10.01%
07-08-2023	188000	205.16	38570000.00	0	0.00	0.00		0.00	0.00	5509869	199.18	1097446331.33	741880	213.10	-0.23%	25.34%	0.00%	25.34%
08-08-2023	44000	213.90	9411600.00	195000	200.25	39048400.00		199.29	38862511.27	5358869	199.29	1067995420.06	1508925	217.20	1.92%	2.92%	12.92%	15.84%
09-08-2023	0	0.00	0.00	575	218.60	125695.00		199.29	114594.58	5358294	199.29	1067880825.48	650377	211.50	-2.62%	0.00%	0.09%	0.09%
10-08-2023	0	0.00	0.00	20005	205.15	4104075.50		199.29	3986895.07	5338289	199.29	1063893930.41	545229	211.00	-0.24%	0.00%	3.67%	3.67%
Total	12408967	156.86	1946440546.60	7070678	173.85	1229225827.30	0	124.82	862546616.19	5338289	199.29	1063893930.41						

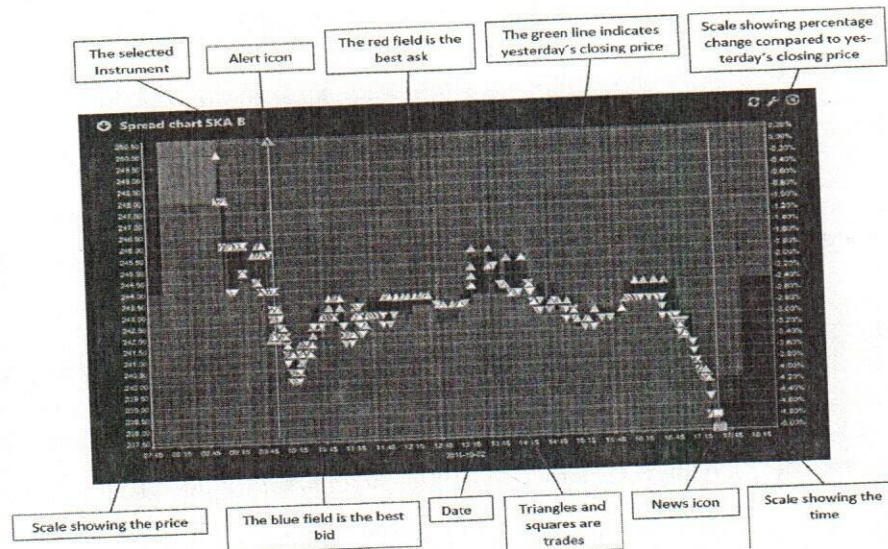
c. Influence of Market Price of SEAPEARL by "LOUTFUL GONI TITU AND HIS ASSOCIATES":

The enquiry team gathered trade monitoring screenshots from Surveillance Department pertaining to the public market trade of SEAPEARL conducted by "LOUTFUL GONI TITU AND HIS ASSOCIATES". The collected data reveals instances of active trading by this group on specific dates, exerting influence on the price of SEAPEARL by conducting trade by the following BOIDs:

[1201950064845550, 1205660064845550, 1602170064845550, 1201570073660878, 1201570073611471, 1201570074234392, 1201570074232417, 1201570074232152, 1201570074232516, 1201570074231696, 1201570074232706 (Combined)]

A demo of detailed information from the screenshots received from DSE surveillance system is as follows:

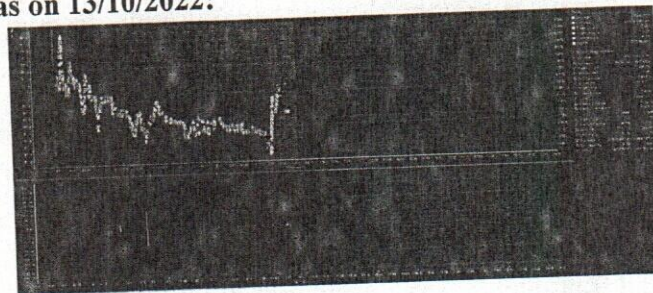
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- ▲ Green triangle represents trade of SEAPEARL by "Loutful Goni Titu and his associates"
- △ White triangle represents trade of SEAPEARL by other clients

After a thorough examination of the trade monitoring screenshots collected from the Surveillance Department, it has been determined that "Loutful Goni Titu and his associates" actively participated in the trading of SEAPEARL shares. Their involvement is noted to have influenced the price of these shares on several dates.

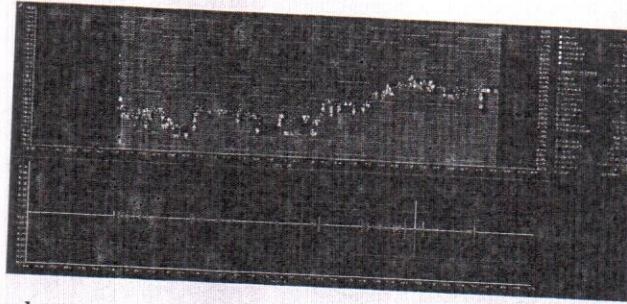
Active Participation as on 13/10/2022:



It was observed in the above graph that on 13-10-2022, total number of trades of SEAPEARL in the market was 3592, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 176 which is approximately 4.90% of the total number of trades in the market. Again, total traded volume of SEAPEARL in the market on that day was 3,891,385 whereas buy volume by the said client(s) was 371,343 which is approximately 9.54% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 13-10-2022 in trading of SEAPEARL share.

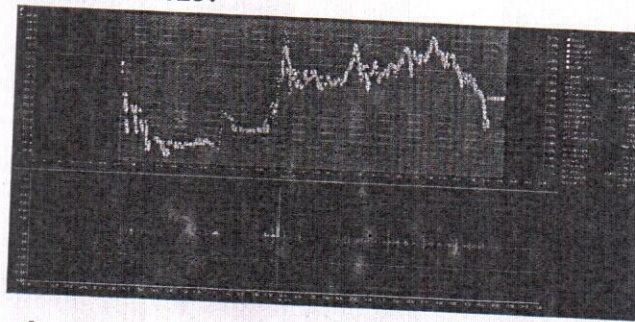
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Active Participation as on 29/11/2022:



It was observed in the above graph that on 29-11-2022, total number of trades of SEAPPEARL in the market was 1605, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 368 which is approximately 22.93% of the total number of trades in the market. Again, total traded volume of SEAPPEARL in the market on that day was 656,248 whereas buy volume by the said client(s) was 113,510 which is approximately 17.30% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 29-11-2022 in trading of SEAPPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPPEARL.

Active Participation as on 25/07/2023:



It was observed in the above graph that on 25-07-2023, total number of trades of SEAPPEARL in the market was 3921, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 302 which is approximately 7.70% of the total number of trades in the market. Again, total traded volume of SEAPPEARL in the market on that day was 1,306,227 whereas buy volume by the said client(s) was 183,428 which is approximately 14.04% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 25-07-2023 in trading of SEAPPEARL share.

Active Participation as on 02/08/2023:



A

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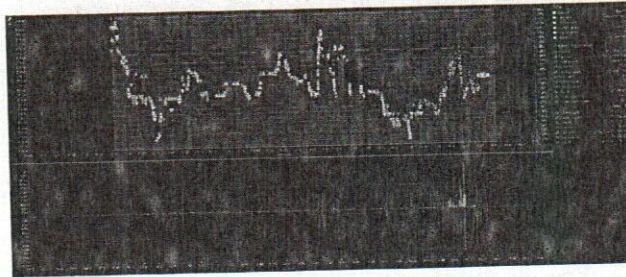
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It was observed in the above graph that on 02-08-2023, total number of trades of SEAPEARL in the market was 3613, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 140 which is approximately 3.87% of the total number of trades in the market. Again, total traded volume of SEAPEARL in the market on that day was 998,917 whereas buy volume by the said client(s) was 41,939 which is approximately 4.20% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 02-08-2023 in trading of SEAPEARL share.

Active Participation as on 06/08/2023:



It was observed in the above graph that on 06-08-2023, total number of trades of SEAPEARL in the market was 2282, whereas number of trades (buy) executed by Loutful Goni Titu and his associates were 246 which is approximately 10.78% of the total number of trades in the market. Again, total traded volume of SEAPEARL in the market on that day was 469,757 whereas buy volume by the said client(s) was 57,759 which is approximately 12.30% of the total traded volume in the market. It is evident from **the green triangles** as plotted in the graph that the client had significant participation in the market on 06-08-2023 in trading of SEAPEARL share. Specially these trades were executed during the closing session of the market and also at higher price to set a higher closing price of shares of SEAPEARL.

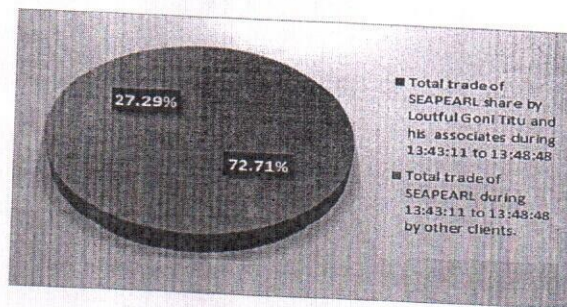
d. Manipulation:

Manipulations of market price of SEAPEARL by LOUTFUL GONI TITU AND HIS ASSOCIATES are given below:

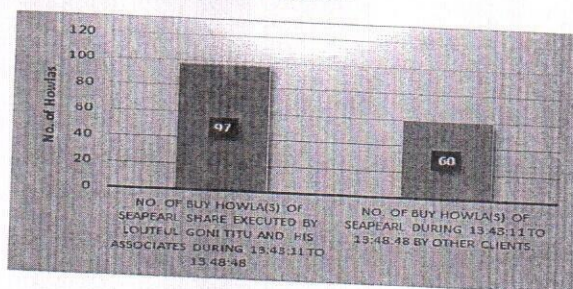
Manipulation of market price as on 13-10-2022:

On 13-10-2022, trading of SEAPEARL share was started at Tk. 152.00 which is Tk. 4.40 more than the YCP of Tk. 147.60. On that day, Loutful Goni Titu and his associates started series of trading at 13:43:11 at price Tk. 135.00 and induced the same to rise to Tk. 151.80 up to 13:48:48. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 13:43:11 to 13:48:48, Loutful Goni Titu and his associates bought 64,377 shares of SEAPEARL compared to the total traded share of 88,542. This is shown in the following Pie Chart.

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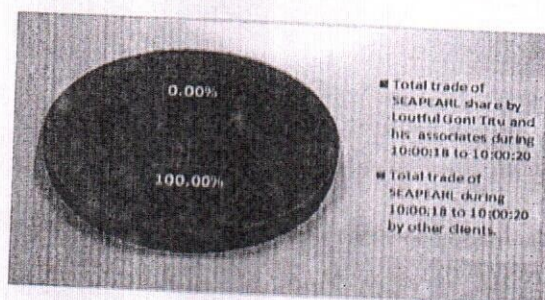
It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 97 howlas to purchase of shares of SEPEARL compared to the total number of howlas of 157 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 72.71% of the total trades of SEPEARL shares by executing 97 of total 157 howlas from 13:43:11 to 13:48:48 on 13-10-2022. From 13:43:11 to 13:48:48, Loutful Goni Titu and his associates induced the price to rise from Tk. 135.00 to Tk. 151.80. Thus, it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEPEARL share.

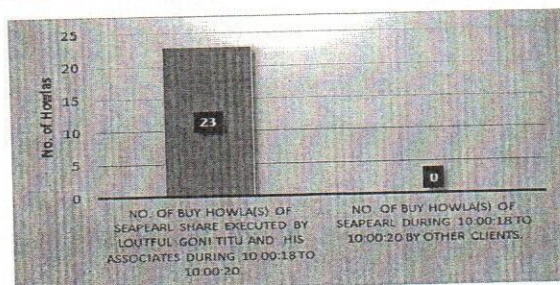
Manipulation of market price as on 29-11-2022:

On 29-11-2022, the trading of SEPEARL shares commenced at Tk. 179.90, indicating a Tk. 4.00 increase from the Yearly Compound Percentage (YCP) of Tk. 175.90. Notably, on that day, Loutful Goni Titu and his associates initiated a series of trades starting at 10:00:18 with a price of Tk. 179.90, and influenced the price to rise to Tk. 185.80 by 10:00:20. The accompanying graph illustrates the substantial trades executed by Loutful Goni Titu and his associates during this specific time frame. It is noteworthy that from 10:00:18 to 10:00:20, Loutful Goni Titu and his associates purchased 7,550 shares of SEPEARL, constituting the entire total traded shares of 7,550. This distribution is visually represented in the following Pie Chart.



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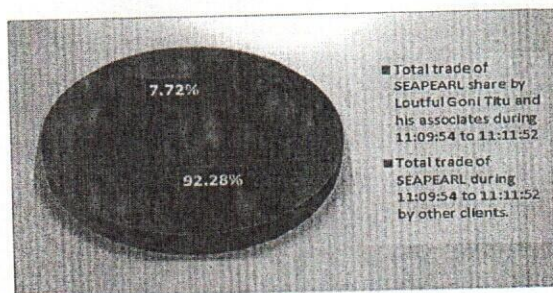
It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 23 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 23 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 100.00% of the total trades of SEAPEARL shares by executing 23 of total 23 howlas from 10:00:18 to 10:00:20 on 29-11-2022. From 10:00:18 to 10:00:20, Loutful Goni Titu and his associates induced the price to rise from Tk. 179.90 to Tk. 185.80. Thus it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share. At the end of the day price of SEAPEARL share was increased by Tk. 7.90 which is approximately 4.49% higher than YCP.

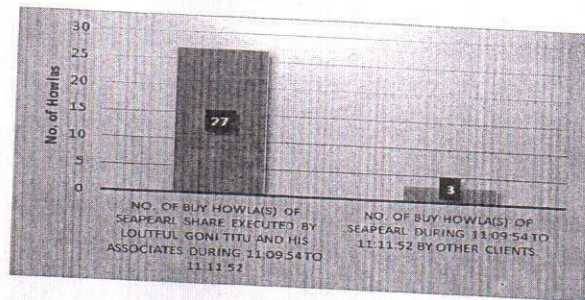
Manipulation of market price as on 25-07-2023:

On 25-07-2023, trading of SEAPEARL share was started at Tk. 231.50 which is Tk. 2.70 more than the YCP of Tk. 228.80. On that day, Loutful Goni Titu and his associates started series of trading at 11:09:54 at price Tk. 226.70 and induced the same to rise to Tk. 229.20 up to 11:11:52. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 11:09:54 to 11:11:52, Loutful Goni Titu and his associates bought 21,039 shares of SEAPEARL compared to the total traded share of 22,799. This is shown in the following Pie Chart:



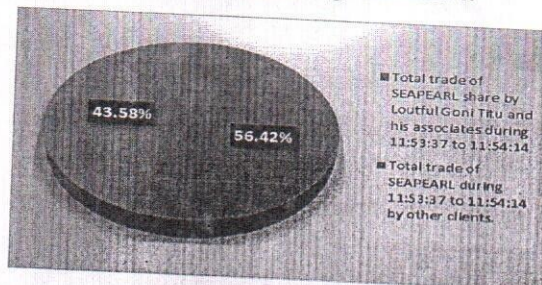
It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 27 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 30 as shown in the following Bar Chart:

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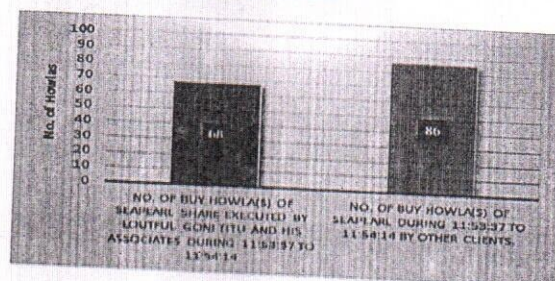


It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 92.28% of the total trades of SEPEARL shares by executing 27 of total 30 howlas from 11:09:54 to 11:11:52 on 25-07-2023. From 11:09:54 to 11:11:52, Loutful Goni Titu and his associates induced the price to rise from Tk. 226.70 to Tk. 229.20. Thus, it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEPEARL share. At the end of the day price of SEPEARL share was increased by Tk. 2.00 which is approximately 0.87% higher than YCP.

On 25-07-2023, Loutful Goni Titu and his associates initiated a series of trades at 11:53:37 with a starting price of Tk. 232.90. They influenced the price to rise to Tk. 234.90 by 11:54:14, as depicted in the provided graph. Notably, Loutful Goni Titu and his associates executed significant trades during this specific time period. It is noteworthy that from 11:53:37 to 11:54:14, Loutful Goni Titu and his associates purchased 50,000 shares of SEPEARL, constituting a substantial portion of the total traded shares amounting to 88,620. This distribution is visually represented in the following Pie Chart:



It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 68 howlas to purchase of shares of SEPEARL compared to the total number of howlas of 154 as shown in the following Bar Chart:



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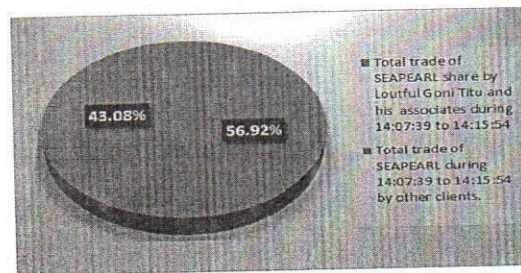
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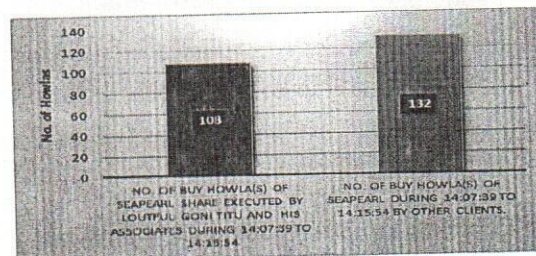
It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 56.42% of the total trades of SEAPEARL shares by executing 68 of total 154 howlas from 11:53:37 to 11:54:14 on 25-07-2023. From 11:53:37 to 11:54:14, Loutful Goni Titu and his associates induced the price to rise from Tk. 232.90 to Tk. 234.90. Thus, it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share.

Manipulation of market price as on 02-08-2023:

On 02-08-2023, trading of SEAPEARL share was started at Tk. 212.00 which is Tk. 1.80 more than the YCP of Tk. 210.20. On that day, Loutful Goni Titu and his associates started series of trading at 14:07:39 at price Tk. 218.90 and induced the same to rise to Tk. 222.30 up to 14:15:54. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 14:07:39 to 14:15:54, Loutful Goni Titu and his associates bought 32,739 shares of SEAPEARL compared to the total traded share of 57,515. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 108 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 240 as shown in the following Bar Chart.

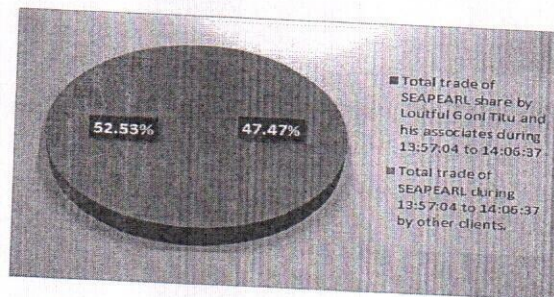


It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 56.92% of the total trades of SEAPEARL shares by executing 108 of total 240 howlas from 14:07:39 to 14:15:54 on 02-08-2023. From 14:07:39 to 14:15:54, Loutful Goni Titu and his associates induced the price to rise from Tk. 218.90 to Tk. 222.30. Thus it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share. At the end of the day price of SEAPEARL share was increased by Tk. 10.70 which is approximately 5.09% higher than YCP.

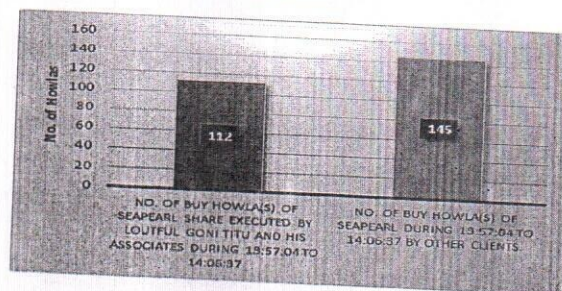
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Manipulation of market price as on 06-08-2023:

On 06-08-2023, trading of SEAPEARL share was started at Tk. 216.00 which is Tk. 1.30 more than the YCP of Tk. 214.70. On that day, Loutful Goni Titu and his associates started series of trading at 13:57:04 at price Tk. 213.00 and induced the same to rise to Tk. 215.00 up to 14:06:37. It can also be observed from the above graph that Loutful Goni Titu and his associates executed significant trades during this time period. It is mentionable here that from 13:57:04 to 14:06:37, Loutful Goni Titu and his associates bought 30,732 shares of SEAPEARL compared to the total traded share of 64,738. This is shown in the following Pie Chart.



It is also found that during the aforementioned period, Loutful Goni Titu and his associates executed 112 howlas to purchase of shares of SEAPEARL compared to the total number of howlas of 257 as shown in the following Bar Chart.



It is observed from the above graphs and screenshot that Loutful Goni Titu and his associates bought 47.47% of the total trades of SEAPEARL shares by executing 112 of total 257 howlas from 13:57:04 to 14:06:37 on 06-08-2023. From 13:57:04 to 14:06:37, Loutful Goni Titu and his associates induced the price to rise from Tk. 213.00 to Tk. 215.00. Thus it seems that Loutful Goni Titu and his associates were actively trying to lift the price of SEAPEARL share.

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e. Public Market Internal Transaction:

Report of internal transaction of sea pearl (Public Market)

Buyer Name	Buyer BOID	Seller Name	Seller BOID	No. Transaction	Trade Volume	Trade Amount	Market Type
Shatrong Agro Fisheries Limited	1201950064845550	Amanat Agro Fisharise	1201570074232152	11	118000	29641600	Public
Shatrong Agro Fisheries Limited	1201950064845550	Hasan nursery	1201570074232417	10	46546	11692355	Public
Shatrong Agro Fisheries Limited	1201950064845550	Hasan nursery	1201570074232417	6	28500	5175600	Public

- Buyer: Shatrong Agro Fisheries Limited (1201950064845550) and seller: Amanat Agro Fisharise (1201570074232152) 11 internal transactions of 118,000 volume of share amounting Tk. 29,641,600, Hasan nursery (1201570074232417) 10 internal transactions of 46,546 volume of share amounting Tk. 11,692,355.
- Buyer: Shatrong Agro Fisheries Limited (1602170064845550) seller: Hasan nursery (1201570074232417) 6 internal transactions of 28,500 volume of share amounting Tk. 5,175,600.

f. Total Gain and Loss by Loutful Goni Titu and his associates form 01.07.2022 to 10.08.2023

Summary																
Block Buy			Block Sale			Total Buy			Total Sale			Cost of Shares Sold		Stock Position		
Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Qty	Price	Amount	Price	Amount	Qty	Price	Amount
6373979	157.82	1005969786.60	3881881	176.03	683316884.30	12408967	156.86	1946440546.60	7070678	173.85	1229225827.30	124.82	882546616.19	5338289	199.29	1063893930.41

Realized Capital gain(loss)per unit	49.03	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	39.28%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	34,66,79,211.11	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (10-08-2023)	211.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	11.71	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	5.87%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	6,24,85,048.59	Quantity of Stock Positon x Unrealized gain (loss) per unit



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Individual Gain-Loss of Shatrong Agro Fisheries Limited:

I. Gain and Loss by "Shatrong Agro Fisheries Limited" from 01.07.2022 to 10.08.2023:

Realized Capital gain(loss)per unit	50.42	Average Sale Price - Average Cost Price
Realized Capital gain(loss)%	46.72%	Gain (loss) Per Unit/Cost Per Unit
Realized Capital gain(loss)TK	28,36,13,904.84	Total Sale Quantity x Gain (loss) Per Unit
Closing Price (10-08-2023)	211.00	Closing Price of Last Investigation Date
Unrealized gain(loss) per unit	24.15	Closing Price of Last Investigation Date - Average Price of Stock Position
Unrealized gain(loss) %	12.93%	Unrealized gain (loss) per unit /Average Price of Stock Position
Unrealized gain(loss) TK	12,22,55,918.06	Quantity of Stock Positon x Unrealized gain (loss) per unit

Contraventions:

Mr. LOUTFUL GONI TITU with his associates i.e. Shatrong Agro Fisheries Limited, Ridoy Poultry Firm, Hasan Nursery, Amanat Agro Fisharies, Sabbir Store, Sarker Agro Farm, Mukta Fisharies, Md. Abu Nayeem and Kamrul Hasan Md. Iqbal Goni manipulated the market price of shares of SEAPEARL by conducting active and aggressive trading jointly and made huge capital gain by deceiving general investors. Thus, "Shatrong Agro Fisheries Limited" has violated the followings:

- 1) Section 17(e)(v) of Securities and Exchange Ordinance, 1969** by directly or indirectly effecting a series of transactions in the shares of 'SEAPEARL' creating the appearance of active trading therein and raising price of the said share.
- 2) Section 17(e)(ii) of Securities and Exchange Ordinance, 1969** by executing trades that created a false and misleading appearance of active trading in security.

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যেহেতু, উপর্যুক্ত আলোচ্য বিষয়ে সংশ্লিষ্ট সিকিউরিটিজ সংক্রান্ত আইন ভঙ্গের কারণে কমিশনের এনফোর্সমেন্ট বিভাগ কর্তৃক এপ্রিল ১৫, ২০২৪ তারিখ বিএসইসি/এনফোর্সমেন্ট/৩৪২৬(২)/২০২৪/৩৫২ স্মারকমূলে Loutful Goni Titu and His Associates (associates are Shatrong Agro Fisheries Ltd., Mr. Kamrul Hasan Md. Iqbal Goni, Md. Abu Nayeem, Ridoy Poultry Firm, Hasan Nursery, Amanat Agro Fisheries, Sabbir Store, Sarker Agro Farm and Mukta Fisheries)-কে মে ০৫, ২০২৪ তারিখে কারণ প্রদর্শন সহ শুনানীতে উপস্থিত হতে বলা হয়। পরবর্তীতে পুনঃনির্ধারিত জুন ০৯, ২০২৪ তারিখে শুনানীতে Shatrong Agro Fisheries Ltd.-এর পক্ষে Mr. Md. Loutful Goni Titu (on behalf) উপস্থিত হয়ে জুন ০৯, ২০২৪ তারিখের পত্রের মাধ্যমে নিম্নলিখিত বক্তব্য দাখিল করেন;

"Please refer to your letter no. BSEC/Enforcement/3426(2)/2024/352 dated 15-April-2024 and subsequently my letter dated 29-April-2024 regarding the captioned subject. In this connection, I, M. Lutful Goni Titu, Managing Director of Shatrong Agro Fisheries Limited would like to brief my position as per following:

A. Regarding my Association with few other BO Holders:

1. Selection of Mr. Md. Abu Nayeem as my Associate:

Firstly, your letter denotes that I am associated with Mr. Md. Abu Nayeem bearing BO ID# 1201570073611471 of SCL Securities on the basis of Mr. Md. Abu Nayeem being the witness of Margin Account maintained with EBL Securities Limited. Please note that the witness is selected by the respective Brokerage House while opening the BO Account. As per practice, I had to sign all the selected areas in the Account Opening Form while opening the said margin code. So, before you raise such queries against my BO Account, I even didn't know the name of the person who has been selected as "Witness" of margin agreement in my BO Account.

Secondly, it is better to ask the respective brokerage house about the identity of Mr. Md. Abu Nayeem.

Thirdly, I have collected the margin agreement documents from EBL Securities Limited (EBLSL), Mercantile Bank Securities Limited (MBSL) and Trust Bank Securities Limited (TBSL). From those documents, it is observed that MBSL kept the "signature of the witness" option fully blanked for their margin agreement documents. On the other hand, TBSL does not maintain any "signature of the witness" for their margin agreement documents. So, it is evident that "signature of the witness" is not mandatory for margin account opening with a brokerage house. **Documents enclosed for your reference.**

2. Selection of Ridoy Poultry Firm, Hasan Nursery & Amanat Agro Fisheries as my Associate:

Your office is tagging me with Ridoy Poultry Firm, Hasan Nursery & Amanat Agro Fisheries as my Associate since those firms belong to trade license number(s) bearing the serial order and from the same Union Parishad.

I firmly declare that it is not known to me whether the said firms belong to the same Union Parishad named Uchakhila Union which is my birth place. Even if they belong to the same Union Parishad of Uchakhila, doesn't it validate that only Mr. Titu shall take



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trade license from Uchakhila Union Parishad to do business while others are not allowed to take trade license from Uchakhila Union?

3. Selection of Sabbir Store, Sarker Agro Farm & Mukta Fisheries as my Associate:

Again I clearly state that I have no business relationship with Sabbir Store, Sarker Agro Farm & Mukta Fisheries whose you are trying to tag with me.

B. Regarding influence of Market Price of SEAPEARL:

We can summarize the BSEC letter regarding influence of market price of SEAPEARL as per following:-

Date	Total No. of Trade	Done by me & others	% of Trade	Total Volume	Done by me & others	% of Volume
13-10-22	3,592	176	4.90%	3,891,385	371,343	9.54%
29-11-22	1,605	368	22.93%	656,248	113,510	17.30%
25-07-23	3,921	302	7.70%	1,306,227	183,428	14.04%
02-08-23	3,613	140	3.87%	998,917	41,939	4.20%
06-08-23	2,282	246	10.78%	469,757	57,759	12.30%

From the above table it is evident that % of trade by me and others ranges from 3.87% to 22.93% whereas the % of volume by me and others ranges from 4.20% to 17.30%. My polite assumption is that if I buy/sale a single share in a day, it can somehow influence the share price of a particular stock. But it is not realistic to accuse me of influencing market price of SEAPEARL because of the above trade participation which might have very insignificant impact on market price of the said stock.

C. Regarding manipulation of Market Price of SEAPEARL:

We can summarize the BSEC letter regarding manipulation of market price of SEAPEARL as per following:-

Date	Total Volume	Done by me & others	Time Frame	Total Time Lapsed	Our Bought Qty	Total Executed Volume	% Qty Bought	Our Howla	Total Howla	% Of Howla executed
13-10-22	3,891,385	371,343	13:43:11 to 13:48:48	5 min 37 Sec	64,377	88,542	72.71%	97	157	61.78%
29-11-22	656,248	113,510	10:00:18 to 10:00:20	2 Sec	7,550	7,550	100.00%	23	23	100.00%
25-07-23	1,306,227	183,428	11:09:54 to 11:11:52	1 min 58 Sec	21,039	22,799	92.28%	27	30	90.00%
02-08-23	998,917	41,939	14:07:39 to 14:15:54	8 min 15 Sec	32,739	57,515	56.92%	108	240	45.00%
06-08-23	469,757	57,759	13:57:04 to 14:06:37	9 min 33 Sec	30,732	64,738	47.47%	112	257	43.58%

From the above table we can see that your designated time lapsed ranging from 02 Seconds to 9 min 33 Sec against total trade hour of 4.30 of DSE based on which you are assuming that I have manipulated shares price of SEAPEARL in the above mentioned date.

Refer to row no. 1: Dated 13-10-22: if you compare total buy volume by me and others of quantity 371,343 against buy of 64,377 during the time frame from 13:43:11 to 11:48:48; you will find it very insignificant quantity against my demand for trade during the whole day.

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Same argument is also applicable for other days of trade executed by me.

Refer to row no. 2: Dated 29-11-22: Please note that you have only considered 02 (two) Seconds of time against 4.30 hours of trading hour to accuse me of manipulating market price of SEPEARL while executing my trades on 29-11-22. Furthermore, someone might have placed the sale order of 7,550 quantity in as "drip quantity" that's why it shows 23 howla executed in that 02 (two) Seconds of time.

D. Regarding Market Internal Transaction:

Since I don't know Amanat Agro Fisheries and Hasan Nursery, I am not involved with any „public market internal transaction“. Moreover, it is not possible for me to check out "who is my counter party" in transaction. Hence, I placed my buy/sale order where I was supposed to get maximum benefit. However, if I were interested to make such transaction, block market could have been better option for me. So, I firmly believe that I have not done anything like „public market internal transaction" as stated by you letter.

E. Regarding Capital Gain and Loss:

From your letter we can summarize the Statement of Capital Gain as per following:

Sl	Name of the Party	Capital Gain (BDT)
1.	Satrong Agro Fisheries Ltd.	283,613,904
2.	Kamrul Hasan Md. Iqbal Goni	(1,522,573)
3.	Md. Abu Nayeem	(40,681)
4.	Ridoy Poultry Firm	1,229,774
5.	Hasan Nursery	(706,668)
6.	Amanat Agro Fisheries	4,441,474
7.	Sabbir Store	1,105,798
8.	Sarker Agro Farm	(1,529,628)
9.	Mukta Fisheries	478,218
Total		287,069,618

The above table is articulated as per information of capital gain calculated by you which shows that between 01-07-2022 to 10-08-2023 the total capital gain made by me and my so-called associates is BDT 287,069,618 (Twenty Eight Crore Seventy Lac Sixty Nine Thousand Six Hundred and Eighteen) only but you are claiming that we have made total capital gain of BDT 346,679,211 (Thirty Four Crore Sixty Six Lac Seventy Nine Thousand Two Hundred and Eleven) only.

However, I have made BDT 189,781,471 (Eighteen Crore Ninety Seven Lac Eighty One Thousand Four Hundred and Seventy One) only from the Account of Satrong Agro Fisheries Limited & Kamrul Hasan Md. Iqbal Goni which is furnished below for your reference (**supporting enclosed**):-

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Statement of Capital Gain

Sl	BO ID	Client ID	BO Name	Capital Gain (Tk.)
1.	12019500-64845550	43305	Satrong Agro Fisheries Ltd.	231,166,413.00
2.	12056600-64845550	1754	Satrong Agro Fisheries Ltd.	4,489,844.00
3.	16021700-64845550	5636	Satrong Agro Fisheries Ltd.	(47,479,029.00)
4.	12015700-73660878	19456	Kamrul Hasan Md. Iqbal Goni	1,604,243.00
Total				189,781,471.00

F. Regarding Contraventions:

As per letter, it is stated that I have violated Section 17(e) (v), 17(e) (ii) and 17(e) (iii) of Securities and Exchange Ordinance-1969 which is tantamount to non-compliance of Securities and Exchange Ordinance-1969.

Please note that for the first time I came to know that even an investor will have adhere all the clauses relating to Securities and Exchange Ordinance-1969. In fact, I was not aware of such clauses earlier and if anything happened here like violating the said sections which was quite unintentional and unwanted from my point of view. However, I shall remain vigilant while executing my trades in future.

In view of the above I would like to state that I am really privileged to get a chance of being heard here in the office of BSEC. Now, I would request your good office to vacate the charge against me regarding the trading of „SEAPEARL“ and thus provide me an opportunity to do the trading activities at capital market in a complied way in future.”

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যেহেতু, Shatrong Agro Fisheries Ltd.-এর উল্লিখিত বস্তব্য এবং অনুসন্ধান প্রতিবেদন পর্যালোচনায় প্রতীয়মান হয় যে, উপস্থাপিত অভিযোগসমূহ সঠিক ও ইচ্ছাকৃত এবং উপর্যুক্ত কর্মকাণ্ডের ফলে পুঁজিবাজারের সাধারণ বিনিয়োগকারীগণ ক্ষতিগ্রস্ত হয়েছেন যা পুঁজিবাজার উন্নয়নের পরিপন্থী, সেহেতু এক্ষেত্রে Shatrong Agro Fisheries Ltd.-এর ব্যাখ্যা কমিশনের নিকট গ্রহণযোগ্য হিসেবে বিবেচিত হয়নি;

যেহেতু, Shatrong Agro Fisheries Ltd.-এর উপর্যুক্ত কর্মকাণ্ড Securities and Exchange Ordinance, 1969 এর Section 17(e)(ii) এবং Section 17(e)(v) লংঘন করেছে, যা সিকিউরিটিজ আইনের পরিপন্থী;

যেহেতু, Shatrong Agro Fisheries Ltd.-এর উপর্যুক্ত কর্মকাণ্ড 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 Shatrong Agro Fisheries Ltd.-কে জরিমানা করা প্রয়োজন ও সমীচীন;

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

- Shatrong Agro Fisheries Ltd.-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 ২৫.৫০ (পঁচিশ দশমিক পঞ্চাশ) কোটি টাকা সর্বমোট ২৫.৫১ (পঁচিশ দশমিক একান্ন) কোটি 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,


22/08/2024
মোঃ আলী আকবর
কমিশনার

বিতরণ:

১। Shatrong Agro Fisheries Ltd.

(BOID: 1201950064845550, 1205660064845550
and 1602170064845550)

Vill: Chakrampur, PO: Chakrampur
Trishal, Maymenhsing.