

April 15, 2009

Investigation Report

On the Manipulative and Other Prohibitive Activities into

Azgard Nine Limited (ANL)

Period under review April 2, 2007 to July 13, 2007

&

November 29, 2007 to April 22, 2008

**Securities & Exchange Commission of Pakistan
Securities Market Division**

Submitted By:


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15/04/09

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1. EXECUTIVE SUMMARY

- 1.1 This is a typical price manipulation case where the price of Azgard Nine Limited (ANL) shares was ramped up. The investigation revealed gross deviations of specific provisions of the securities market law. During the review period from April 02, 2007 to July 13, 2007 (first review period), and November 29, 2007 to April 22, 2008 (second review period) unusual trading activities were observed in ANL that warranted critical review of the whole situation. From the analysis of trading information of the subject review period, it transpired that a 'Group' of individuals and companies were directly involved in price manipulation of ANL with the connivance and active participation of their respective brokerage houses.
- 1.2 During both review periods, the said Group indulged in active manipulative trading in the scrip of ANL and built up unusually large positions in the company's shares resulting in distortion of the market and creation of artificial market in these shares. It was noted that the major trading activities were carried out by the clients of JS Global Capital Limited, member Karachi Stock Exchange
- 1.3 As part of the scheme, substantial quantity of ANL shares; 105 million shares, constituting 40% of total market trade, were bought by the Group, out of which 87 million shares, constituting 33% of total market trade were sold during the first review period, while the same activity was observed in the second review period with 154 million shares as Buy Volume (27% of total market) and 155 million of Selling Volume (27% of total market), traded by the said 'Group'.
- 1.4.1 The above trading volumes were executed with a view to generating artificial trading in ANL for the purpose of inducing others to purchase ANL shares. The following mentioned table provides a synopsis about the total trade and the cross trade executed by the Group members:

SHARES BOUGHT					
Review Period	Market Volume	Group Buy	Sw Tr. Total Mkt Vol	Group Cross Buy	Sw Tr. Group Buy
First	264,314,500	104,985,000	39.72%	50,328,000	47.94%
Second	565,273,000	154,696,500	27.37%	76,013,500	49.14%
Total	829,587,500	259,681,500	31.30%	126,341,500	48.65%

SHARES SOLD					
Review Period	Market Volume	Group Sell	Sw Tr. Total Mkt Vol	Group Cross Sell	Sw Tr. Group Sell
First	264,314,500	86,915,500	32.88%	50,328,000	57.90%
Second	565,273,000	155,265,000	27.47%	76,013,500	48.96%
Total	829,587,500	242,180,500	29.19%	126,341,500	52.17%

1.5 During the first review period (April 02 to July 13, 2007) the price of ANL increased from Rs.22.85 to 53 (132%), while during the second review period (Nov 29, 2007 to April 22, 2008) the price increased from Rs.35 to Rs.96 (174%).

1.6 Based on the review of the trading information and records, it is prima facie evident that there is potential violation of following laws:

1.6.1 Violation of Securities and Exchange Ordinance 1969.

1. Section 17 (a)

....employ any device, scheme or artifice, or engage in any act, practice or course of business which operates or is intended or calculated to operate as a fraud or deceit upon any person;

2. Section 17 (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;

(Hi) effect any transaction in such security which involves no change in beneficial ownership;

(iv) enter into an order or orders for the purchase and sale of security which will ultimately cancel out each other and will not result in any change in the beneficial ownership of such security,

(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 inducing its purchase by others or depressing its price for the purpose of inducing its sale by others;

1.6.2 Violation of Companies Ordinance 1984 - S-222 Submission of statements of beneficial owners of listed securities, and S-224 trading by directors, officers and principal shareholders.

1.6.3 Violation of Brokers and Agents Registration Rules, 2001- R-12 Brokers to abide by code of conduct

Violation of KSE General Regulations

1.6.4 Clause 9 of Account Opening Form

2. INQUIRY OFFICERS, TERMS OF REFERENCE AND THE REVIEW PERIOD

2.1 In order to conduct investigation into the matter, the Commission appointed Waqar Ahmed Siddiqui and Shazia Baig of Market Surveillance Wing (MSW) as Investigation officers under Section 21 of the Securities and Exchange Ordinance, 1969 read with Section 29(2) of the Securities & Exchange Commission of Pakistan Act, 1997.

2.2 The review period of the report is from April 2, 2007 to July 13, 2007 and November 29, 2007 to April 22, 2008.

2.3 The terms of reference for the investigation included:

To inquire into and to investigate the dealings, business, or other transactions pertaining to the shares of ANL and to do all such things as are necessary or incidental thereto.

2.3.1 Any and all the acts or omissions constituting the violation of the Securities and Exchange Ordinance, 1969 and the Rules made there under.

2.3.2 Any violations of any applicable laws, including but not limited to the Securities and Exchange Ordinance, 1969, Listed Companies (Substantial Acquisitions of voting shares and takeovers) Ordinance, 2002, Brokers and Agents Registration Rules, 2001, Companies Ordinance, 1984, and all Rules and Regulations made there under, by any person.

3. METHODOLOGY ADOPTED TO CONDUCT ENQUIRY INTO ANL

3.1 Both broker and client level analysis for Ready and CFS market trading activities over the review periods, i.e. from April 2, 2007 to July 13, 2007 and November 29, 2007 to April 22, 2008. Detailed investigation methodology comprises of the following set of data analysis;

Analysis of scrip level trading details i.e., ready turnover, price, CFS quantum etc.;

Analysis of Client level Ready market trading activities through UIN Utilities (Software developed by SECP IT department, based on UIN functionalities);

Analysis of broker and client level Ready and CFS market trading activities based on the information extracted from UIN Utilities and obtained from KSE and brokers;

Analysis of CDC data relating to the balances and movement of scrip of ANL particularly in relation with the identified concerned brokers and clients;

Information collected from various banks accounts through State Bank of Pakistan (SBP) and NIFT.

Azgard-9 is a specialized textile company and manufactures specialized yarns, denim fabrics and denim garments. These products are marketed through a global sales and distribution network including offices in five countries.

CORPORATE INFORMATION OF ANL

The total paid up capital of the company is 378,883,890 shares of Rs; 10/- each out of which ordinary shares are 312,710,057 and preference shares are 66,173,833. Following are the major share holders of the company as at December 31, 2006:

Shareholding positions as at December 31,2006					
S.No	Shareholder's Name	Ordinary Shares	% w.r.t Ordinary Shares	Preference	% w.r.t Preference Share Capital
1.	Ahmed Shaikh	28,072,270	8.98%	Nil	
2.	Aehsun Shaikh	17,672,270	5.65%	Nil	
3.	Nasreen Shaikh	55,369,989	17.71%	16,922,299	25.57%
4.	JS & Company	64,264,827	20.55%	12,605,042	19.05%
5.	JS Securities Services	Nil		9,160,542	13.84%
6.	Others	147,330,701	47.11%	27,485,950	41.54%
	TOTAL	312,710,057		66.173.833	

List of Directors and officials of the Company as at	Chairman	March 31, 2007 is given below:
	Chief Executive/Director	
Mr. Mueen Afzal	Director	
Ahmed H. Shaikh	Director	
Mr. Aehsun M. H. Shaikh	Director	
Chief Justice (R) Mian Mahboob Ahmad	Director	
Mr. Ali Jehangir Siddiqui	Director	
Mr. Khalid A. H. Al-Sagar	Company Secretary Chief	
Mr. Mohammed Khaishgi	Financial Officer	
Mr.Muhammad Ijaz Haider		
Mr.Abid Amin		

It may be worth-mentioning that the abovementioned persons hold the respective offices during both the review periods.

5.1 PRICE AND VOLUME HISTORY

5.1.5.1 EVENTS LEADING TO INITIATION OF ENQUIRY

FACTS LEADING TO INITIATION OF ENQUIRY
During the first review period i.e. April 02, 2007 to July 13, 2007, significantly high turnover and price hike was observed in ANL The price of the scrip was Rs.22.85 on April 02, 2007 and touched its maximum, Rs.53 on June 29, 2007, showing a substantial increase of 132%. While the average daily turnover in the scrip increased from 1 million shares to 2 million shares during this review period.

During the second review period i.e November 29, 2007 to April 22, 2008, the price was changed from Rs.35 to Rs.96, showing a substantial change of 174% in the scrip price. While the average daily turnover increased to 7 million shares, touching the maximum high of **15 million** shares in a single day.

A month wise comparison of average daily turnover along with fortnightly change in the price of the scrip is as follows:

	..				
Jan-07	579,605	02.01.07	21.80	(0.75)	-3.44%
		16.01.07	21.05		
		17.01.07	21.00	1.50	7.14%
		31.01.07	22.50		
Feb-07	1,005,842	01.02.07	22.90	(1.15)	•5.02%
		15.02.07	21.75		
		16.02.07	21.65	1.45	6.70%
		26.02.07	23.10		
Mar-07	1,927,071	01.03.07	23.90	0.55	2.30%
		15.03.07	24.45		
		16.03.07	24.90	3.65	14.66%
		30.03.07	28.55		

Aug-07	2,964,000	01.08.07	43.00	(2.50)	-5.81%
		15.08.07	40.50		
		16.08.07	40.00	(3.00)	-7.50%
		31.08.07	37.00		
Sep-07	1,758,200	03.09.07	37.05	4.95	13.36%
		14.09.07	42.00		
		17.09.07	42.20	(3.25)	-7.70%
		28.09.07	38.95		
Oct-07	2,185,813	01.10.07	40.00		0.00%
		17.10.07	40.00		
		18.10.07	40.70	(2.40)	-5.90%
		31.10.07	38.30		

Report Review Period					
Nov-07	1362,100	01.11.07	37.45	5.35	13.25%
		15.11.07	35.50		
		16.11.07	35.85	6.05	13.25%
		30.11.07	35.90		
Dec-07	6225,800	03.12.07	36.70	15.20	25.83%
		14.12.07	60.90		
		17.12.07	50.10	(4.85)	9.68%
		31.12.07	45.25		
Jan-08	4903,364	01.01.08	43.00	2.20	26.57%
		15.01.08	55.20		
		16.01.08	52.15	4.35	13.25%
		31.01.08	54.40		
Feb-08	2729,200	01.02.08	52.80	10.80	15.25%
		14.02.08	52.00		
		15.02.08	50.85	5.95	11.70%
		29.02.08	56.80		
Mar-08	7486,895	03.03.08	59.60	3.70	9.56%
		14.03.08	65.80		
		17.03.08	65.20	2.45	3.50%
		31.03.08	67.35		

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May-08	3,568,800	02.05.08	84.00	(8.70)	-10.36%
		15.05.08	75.30		
		16.05.08	72.50	(18.50)	-25.52%
		30.05.08	54.00		
Jun-08	2,110,714	02.06.08	53.30	12.70	23.83%
		13.06.08	66.00		
		16.06.08	62.70	(1.14)	-1.82%
		30.06.08	61.56		
Jul-08	588,370	01.07.08	60.95	(8.60)	-14.11%
		15.07.08	52.35		
		16.07.08	52.35	(7.55)	-14.42%
		31.07.08	44.80		
August-08	954,684	01.08.08	42.56	(3.14)	-7.38%
		15.08.08	39.42		
		18.08.08	41.39	(10.86)	-26.24%
		29.08.08	30.53		

5.1.2 Day wise Price and Volume History has been provided in Annexure 5.1.2

PERIOD	Total Working Days	Upper Locks	.Lower Locks
April 02,2007 to July 13 2007	73	18	6
November 29,2007 to April 22,2008	96	32	11

The following table reveals the upper and lower locks details during the first review period:

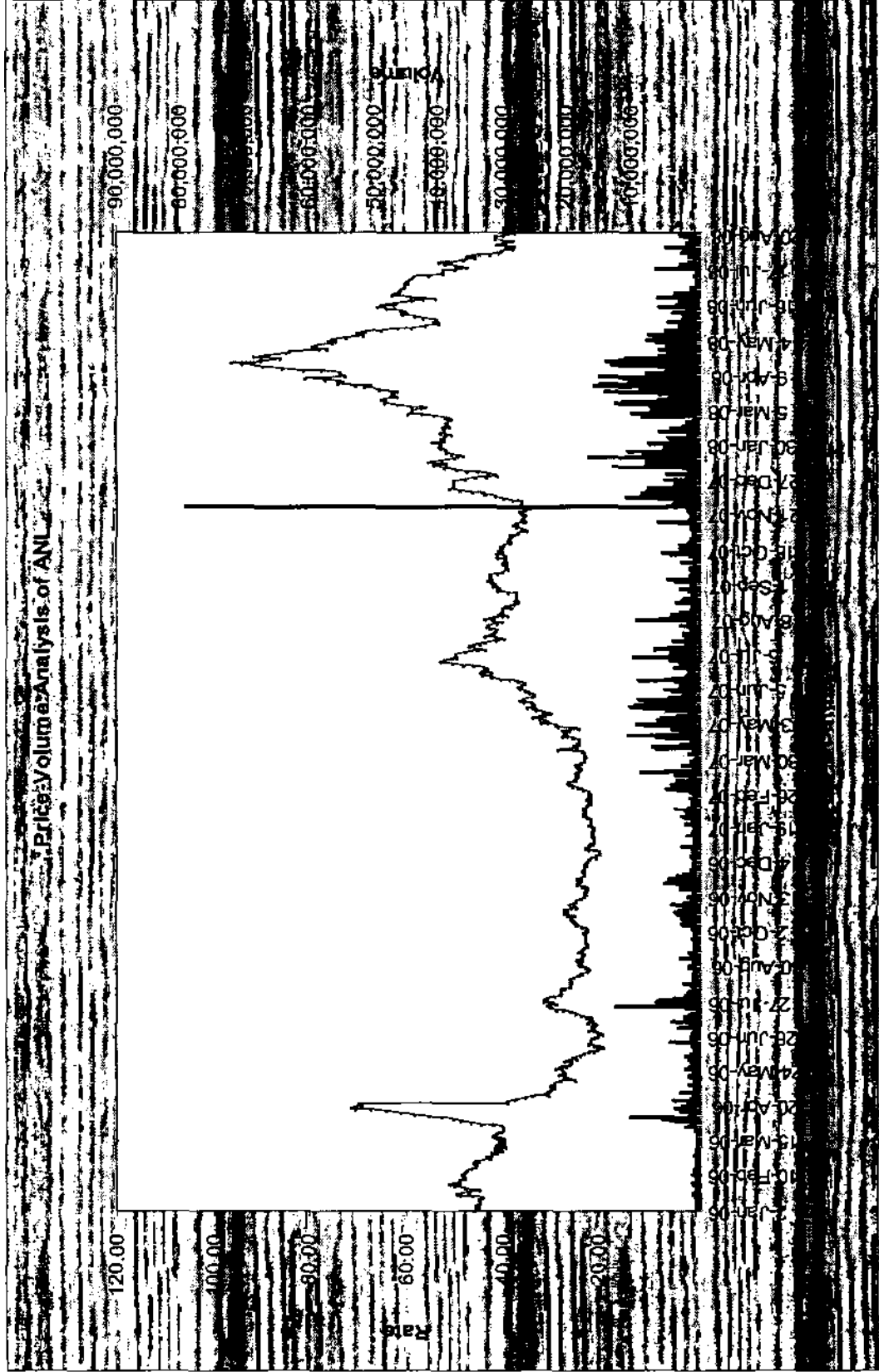
5.1.3 During both the review periods frequent upper locks were observed in the price of ANL.

Date	Open Rate	High Rate	Low Rate	Closing Rate	Turnover	Price Change	% Change
18-Apr-07	24.1	25	24	25.3	4,716,000	1.2	4.98%
19-Apr-07	25.3	27	25	26.55	6,357,500	1.25	4.94%
26-Apr-07	26.05	27	26	27.35	3,854,500	1.3	4.99%
27-Apr-07	27.35	29	28	28.7	6,186,500	1.35	4.94%
3-May-07	28.9	30	28	30.3	9,364,500	1.40	4.84%
4-May-07	30.3	32	31	31.8	3,106,500	1.50	4.95%
8-May-07	30.6	32	31	32.1	2,535,000	1.50	4.90%
9-May-07	32.1	34	32	33.5	5,576,000	1.40	4.36%
10-May-07	33.5	34	32	31.95	3,025,500	(1.55)	-4.63%
15-May-07	30.05	32	30	31.55	2,553,000	1.50	4.99%
16-May-07	31.55	33	31	33.1	4,659,500	1.55	4.91%
21-May-07	34.9	35	33	33.25	9,469,000	(1.65)	-4.73%
24-May-07	33.95	36	34	35.6	7,850,000	1.65	4.86%
29-May-07	35.5	36	34	33.75	4,195,500	(1.75)	-4.93%
12-Jun-07	35.05	36.8	35	37	3,421,000	1.65	4.71%
13-Jun-07	36.7	38.5	36.95	39	9,020,000	1.8	4.90%
14-Jun-07	38.5	40.4	39	40	3,677,500	1.9	4.94%
18-Jun-07	41.9	43.95	42.5	44	1,472,000	2.05	4.89%
20-Jun-07	44.2	43.8	42	42	724,500	-2.2	-4.98%
21-Jun-07	42	43.8	40.2	44	1,036,000	1.8	4.29%
26-Jun-07	43.55	45.7	43.95	46	2,513,500	2.15	4.94%
27-Jun-07	45.7	47.95	47	48	757,000	2.25	4.92%
3-Jul-07	52.1	52.5	49.5	49.5	1,321,500	-2.6	-4.99%
9-Jul-07	49.75	50.35	47.3	47.5	3,979,500	-2.25	-4.52%
10-Jul-07	47.5	47.85	45.15	45.15	3,924,000	-2.35	-4.95%

The following table reveals the upper and lower locks data during the second review period:

Date	Open Rate	High Rate	Low Rate	Closing Rate	Turnover	Price Change	% Change
5-Dec-07	35.85	37.6	35.75	37.6	5,949,500	1.75	
6-Dec-07	37.6	39.45	37.9	39.45	11,098,000	1.85	
7-Dec-07	39.45	41.4	40	41.4	7,072,500	1.95	
10-Dec-07	41.4	43.45	41.5	43.45	5,959,500	2.05	
12-Dec-07	44	46.2	44	46.2	7,759,000	2.2	
13-Dec-07	46.2	48.5	46.3	48.5	5,411,000	2.3 IHEK	
14-Dec-07	48.5	50.9	49.25	50.9	7,485,000	2.4	
1-Jan-08	45.25	43	43	43	637,500	-2.25	
2-Jan-08	43	43.75	40.85	40.85	4,536,500	-2.15	
3-Jan-08	40.85	42.85	42	42.85	1,955,000	2	
4-Jan-08	42.85	44.95	44.5	44.95	931,000	2.1	
7-Jan-08	44.95	47.15	45.4	47.15	1,027,500	2.2	
8-Jan-08	47.15	49.5	49	49.5	1,788,500	2.35	
9-Jan-08	49.5	51.95	49	51.95	12,888,500	2.45	
10-Jan-08	51.95	54.5	50.7	54.3	8,016,000	2.35	
11-Jan-08	54.3	56.1	51.6	51.6	6,717,000	-2.7	
14-Jan-08	51.6	54.15	49.05	54.15	7,651,500	2.55	
16-Jan-08	55.2	55.75	52.45	52.45	5,556,000	-2.75	
17-Jan-08	52.45	51.6	49.85	49.85	5,517,500	-2.6	
22-Jan-08	48.05	50.35	45.8	50.35	7,754,500	2.3	
28-Feb-08	51.55	54.1	52	54.1	8,627,500	2.55	
29-Feb-08	54.1	56.8	55.1	56.8	7,855,500	2.7	
3-Mar-08	56.8	59.6	57.5	59.6	10,145,000	2.8	
10-Mar-08	56	58.8	56	58.8	7,392,500	2.8	
11-Mar-08	58.8	61.7	57.65	61.7	12,510,500	2.9	
12-Mar-08	61.7	64.7	61.8	64.5	9,994,000	2.8	
18-Mar-08	65.2	65.65	61.95	61.95	4,219,000	-3.25	
27-Mar-08	62.5	65.6	63.05	65.6	8,672,500	3.1	
28-Mar-08	65.6	68.85	66.7	68.85	6,344,500	3.25	
1-Apr-08	67.35	70.7	65.7	70.7	15,102,500	3.35	
2-Apr-08	70.7	74.2	71	74.2	6,852,000	3.5	
4-Apr-08	73.3	76.95	73	76.95	9,903,000	3.65	
7-Apr-08	76.95	80.75	76.3	80.75	11,274,500	3.8	
8-Apr-08	80.75	82.2	76.75	76.75	15,035,000	-4	
9-Apr-08	76.75	77.4	72.95	72.95	4,187,500	-3.8	
14-Apr-08	73.9	77.55	72.35	77.55	4,607,500	3.65	
15-Apr-08	77.55	81.4	79	81.4	2,908,500	3.85	
16-Apr-08	81.4	85.45	84.45	85.45	5,679,000	4.05	
17-Apr-08	85.45	89.7	88.1	89.7	9,821,000	4.25	
18-Apr-08	89.7	94.15	88	94.15	13,057,000	4.45	
22-Apr-08	96.4	97.75	91.6	91.6	13,954,500	-4.8	

5.1.4 A graphical presentation of price-volume analysis during the subject review period is also given below.



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5.1.5 What makes it abnormal?

- 5.1.5.1 The significant increase in price per share as well as volume, as discussed above, was not prompted or accompanied by any significant change in fundamentals underlying the valuation of price of a share or any market dynamics.
- 5.1.5.2 There were no high expectations from the corporate results. On April 30, 2007 quarterly results were announced, declaring PAT of Rs. 76.94 million (a decrease of 58% from the comparable period) and EPS of Rs.0.20 as compared to Rs1.92 for the same period in 2006. This trend continues till second review period and an EPS of Rs.0.42 was announced at first quarter of new financial year, ended March 31, 2008. Furthermore, there was no cash; bonus or right shares were announced during the review periods. The considerable increase in the trading activities and the share price despite the slump in the performance as depicted by the financial results is itself a strong indication of market manipulation.
- 5.1.5.3 The market as a whole was also performing in normal and steady manner. Following table reveals the KSE 100 index increase during both the review periods, which is in no means in conformity with the increase in ANL price:

PERIOD ,	KSE 100-INDEX ;	CHANGE	96 CHANGE in KSE INDEX.:-	% CHANGE in ANLPRICE
April 02,2007	11,276.51			
July 13,2007	14,202,23	2,925.72	^+25.95%	..+132%
November 29,2007	13,963.59			
April 30,2008	15,543.52	1,579.93		+174%

5.2 TOP BUYERS AND SELLERS DURING THE REVIEW PERIODS:

Review Period 1:

While reviewing the trading at client/UIN level, the top buyers and sellers were identified as individuals and companies who were clients of JS Global Capital (Brokerage House) including JS Group companies, JS Group mutual funds being managed by JS Investments, sponsors / directors of Azgard Nine Limited, Aziz Fidahussein brokerage house and his family members and client and associate of Live Securities. Details of major buyers and sellers are given hereunder during the period April 02,2007 to July 13,2007:

Buyer Name	UIN	Buy Volume	Sell Volume	Ratio
*Saad Saeed Farooqui'	JSGCL	27,359,500	17,617,500	64%
*Zehra	AFH	18,473,000	19,235,500	104%
*Jahangir Siddiqui & Company Limited	JSGCL	11,920,500		0%
*Shazia	JSGCL	11,289,500	10,389,500	92%
*Cross By Dragon Fund	JSGCL	7,081,000	5,610,500	79%
*Jahangir Siddiqui & Sons	JSGCL	6,161,000	113,500	2%
*Muhammad Iqbal	AFH	5,897,000	5,022,500	85%
*Amna Humayun Shaikh	JSGCL	2,755,500	2,320,000	84%
*Syed Nizam Shah	JSGCL	2,315,500	2,315,500	100%
*Khalid Rafi	JSGCL	2,226,SOD	2,226,500	100%

Review Period 2

While reviewing the trading at client level, the top buyers and sellers were again identified as JS Global Clients. Details of major buyers and sellers are given hereunder during the period November 29, 2007 to April 22, 2008:

*Muhammad Asif Mendha	Live	27,353,500	23,525,000	86.00%
*Saad Saeed Faruqui	JSGCL	20,005,500	21,284,500	106.39%
*Crosby Dragon Fund	JSGCL	19,251,000	19,252,000	100.01%
*Zehra	AFH	11,301,500	11,378,500	100.68%
*Jahangir Siddiqui Securities Services Ltd	JSGCL	11,004,000		0.00%
*Saba Irfan Aziz	AFH	10,877,000	11,968,500	110.03%
*Muhammad Riaz	JSGCL	9,104,500	6,095,500	66.95%
*Rashid Siddiqui	JSGCL	7,402,000	7,452,000	100.68%
*Shazia Sadiq	JSGCL	6,951,000	6,951,000	99.99%
*Zaibunisa	JSGCL	5,385,000	5,385,000	100.00%
*Nasreen Humayun Sheikh	JSGCL	4,709,500	4,700,000	99.80%

*Muhammad Asif Mendha	Live	23,525,000	27,353,500	116%
*Saad Saeed Faruqui	JSGCL	21,284,500	20,005,500	94%
*Crosby Dragon Fund	JSGCL	19,252,000	19,251,000	100%
*Saba	AFH	11,968,500	10,877,000	91%
*Zehra	AFH	11,378,500	11,301,500	99%
*Jahangir Siddiqui & Sons Pvt Limited	JSGCL	9,679,500		0%
*Rashid Siddiqui	JSGCL	7,452,000	7,402,000	99%
*Shazia	JSGCL	6,951,000	6,951,000	100%
*JS Investments Limited	JSGCL	6,366,000	3,485,000	55%
*Muhammad Riaz	JSGCL	6,095,500	9,104,500	149%
*Zaibunisa	JSGCL	5,385,000	5,385,000	100%

5.3 CFS MARKET
SYNOPSIS: Review
Period 1

During the analysis of CFS (Continuous Funding System) market of Azgard Nine it was found that JS Global Capital Limited (JSGCL) has been the major Financier of ANL shares and JS Global clients accused of manipulation were the major Financees during the two review periods. The following table reveals the market CFS and the JS Global share as financier and financee:

Review Period 1

DATE. S i. ■■■■* - ' *	MR i.Cf^Marltat ^	SGLOBA L ^CFS^	PARTICIPAT E ^Gfdbujas^:	SMI® fpts		v7-JS Global ;V'gcifeiHs^S	iiiijisip	V '■■■■
2-Apr-07	28,162,000	12.46	25,627,500	12.01	91%	21,157,000	12.24	75%
13-Apr-07	27,111,500	14.2	20,832,500	11.87	77%	23,458,000	11.99	87%
30-Apr-07	37,306,000	12.02	32,207,500	11.70	86%	34,204,500	11.92	92%
15-Jun-07	24,712,500	*	17,088,500	11.54	69%	21,007,000	11.71	85%
29-Jun-07	24,636,500	12.15	18,165,500	12.22	74%	19,328,000	13.69	78%
13-Jul-07	25,640,000	12.46	17,352,500	11.66	68%	16,663,000	11.75	65%

Figure not available at KSESite Review Period 2

DATE V	GLOBAL	PARTICIPATI	November	^ - Markctir	SCRIP	glgf		
	ON 1 Review	Period	^	Ew^tte^F	DEANL«&&			
	mm	Period			2&j2Q0StiM<Vt			
	mm	iid\$sG[obat?a			a			
	o Eatej]	sl	A Rata#		« H«			
		•mieri			yA'ttliertejs			
		•i^						
29-Nov-07	13,342,500	11.17	4,413,000	11.04	33.07%	8,044,000	11.04	60.28%
14-Dec-07	18,228,500	11.26	10,024,000	11.27	54.99%	12,238,000	12.12	67.14%
31-Dec-07	16,373,000	14.84	10,589,500	17.10	64.68%	13,014,500	17.36	79.49%
15-Jan-08	18,256,000	11.17	9,399,500	10.84	51.49%	13,014,000	10.98	71.29%
31-Jan-08	15,467,000	10.87	5,548,000	10.78	35.87%	6,543,000	10.79	42.30%
15-Feb-08	15,108,000	10.91	7,367,000	10.91	48.76%	7,301,000	10.91	48.33%
29-Feb-08	14,563,000	11.50	7,644,000	11.19	52.49%	8,015,000	11.59	55.04%
14-Mar-08	16,874,500	11.07	5,720,000	11.07	33.90%	12,374,500	11.15	73.33%
31-Mar-08	17,143,000	11.81	2,204,500	11.35	12.86%	11,606,000	11.47	67.70%
15-Apr-08	12,614,500	11.70	2,622,000	11.33	20.79%	9,734,500	11.63	77.17%
22-Apr-08	16,062,500	12.95	2,658,500	11.66	16.55%	10,595,500	11.83	65.96%

From the above mentioned statistics, it is evident that at the start of the surge in ANL, JSGCL supplied the major financing to the major traders all working through the same house. While subsequently during the second review period the share as Financier showed a slight decrease, however the Finanee side still showed some critical percentages of financing availed by the clients of JSGCL.

Who were involved in market manipulation?

From the analysis of trading information, it transpired that a 'Group' orchestrated a scheme of market manipulation in the scrip of ANL during the periods under review. An analysis of the trading pattern during both the review periods revealed concentration in the trading by the said group of persons who are interlinked with each other through professional or personal relationships and the nature of their trading and transactions indicated an attempt to artificially inflate the price of ANL.

The following table indicates the names of all the participants of the 'Group', including those who though not traded directly in the scrip of ANL but have been involved in designing the over ait scheme of manipulation indulging their funds and other resources mainly through their fronts or brokerage houses:

S. No		Brokerage House
	(A) J S Group Companies and Funds being managed by JS investment	
1	J S Global Capital Limited (JSGCL)	Member KSE
2	Jehangir Siddiqui & Co Limited	JSGCL
3	Jehangir Siddiqui & Sons (Pvt) Limited	JSGCL
4	J S Bank Limited	JSGCL
5	Jehangir Siddiqui Securities Services Limited	JSGCL
6	JS Investments Limited (AMC) including all the 5 mutual funds managed by JSIL	JSGCL
	(B) Front OF JS Group Officials	
7	Shazia Sadiq (wife of JSCL employee , working as front of Munaf Ibrahim, CED of JSCL)	JSGCL
8	Mehboob AN Kalyar (Personal Secretary of Jahangir Siddiqui)	JSGCL
9	Mashooq Ali Kaiyar (brother of Mehboob Kaiyar) Front of Mehboob Katyaf	JSGCL
ID	Muhammad Iqbal (Front for Mr. Abdul Ha meed Dagia, (Director/CEO of Jahangir Siddiqui Securities Limited) his sons Junaid Dagia, Mubashir Dagia and his wife Zubaida Dagia	AFH
	(C) Associates of JS Group and Client of JS Global Capital	
11	Crosby Dragon Fund (Business Associates)	JSGCL
12	Saad Saeed Farooqi (Business Partner)	JSGCL
13	Rubina Malkani (wife of Managing Director J S Global Mr. G.M.Malkani)	JSGCL
14	Syed Nizam Shah (Director in Jahangir Siddiqui & Co Ltd)	JSGCL
15	Zaibunnisa (Front of Ahmed Abdul-Razzak, a stock dealer working with JS group)	JSGCL
16	Muhammad Ibrahim (Client)	JSGCL
17	Khalid Rafi (Client)	JSGCL
18	Rashid Siddiqui (Client)	JSGCL
	(D) J S Group Officials/Associates traded through their Fronts	
19	Munaf Ibrahim CEO Jahangir Siddiqui & Co, fronted by Shazia Sadiq and M.Sadiq	JSGCL
20	Ali Jahangir Siddiqui (Director/CEO JSCL and ANL) fronted by Mehboob Kaiyar	JSGCL
21	Abdul Hameed Dagia and his Sons Mubashir Dagia and Junaid Dagia fronted by M.Iqbal	AFH
22	G.M.Malkani in position of JS Global CEO and fronted by Mrs.Rubina Malkani	JSGCL
23	Ahmed Abdul-Razzakfronted by Zaibunnisa	JSGCL

S.No	SHAIKH FAMILY GROUP	Brokerage House
	(A) Shaikh Famiyy (Sponsors of Azgard Nine Limited)	
1	Humayun Shaikh	JSGCL
2	Nasreen Shaikh w/o Humayun Shaikh (Having more than 10% shareholding in ANL)	JSGCL
3	Ahmed Shaikh (Director and CEO of Azgard Mine Limited) (Son of Humayun & Nasreen Shaikh)	JSGCL
4	Begum Aftab Kari (Mother of Nasreen Shaikh)	JSGCL
5	Aalia Sheeraz Monnoo (Daughter of Humayun & Nasreen Shaikh)	JSGCL
6	Amna Humayun Shaikh (Daughter of Humayun & Nasreen Shaikh)	JSGCL
7	Ahsan Shaikh Director ANL and Beneficiary of Riaz, Ijaz and BAK BANK accounts (Son of Humayun & Nasreen Shaikh)	
	(B) Fronts of Shaikh Famiyy	
9	Muhammad Riaz (Associate of Azgard Nine Limited)	JSGCL
10	Muhammad Ijaz (Employee of Azgard Nine Limited)	JSGCL

S.No	Aziz Fidahussein Brokerage House and his family members	Brokerage House
1	Aziz Fidahussein & Co Limited (Member Karachi Stock Exchange)	Member KSE
2	Zehra Nazim Aziz (Daughter-in-Law of Aziz Fidahussein)	AFH
3	Saba Irfan Aziz (Daughter-in-Law of Aziz Fidahussein)	AFH
4	Irfan Aziz (Director Aziz Fidahussein St Co) fronted by Zehra and Saba Aziz	AFH

S.No	Live Securities & Associates	Brokerage House
1	Live Securities (member Karachi Stock Exchange)	Member KSE
2	Muhammad Asif Mendha (Front of Irfan Amanullah-Attock Cement)	Live Securities
3	Irfan Amanullah fronted by Asif Mendha	Live Securities
4	Ashraf Dossani CEO Live Securities (Cousin of Irfan Amanullah)	Live Securities

5.4.1 All the above mentioned clients of JS Global, Aziz Fidahussein and Live Securities have been found in connection with each other. First of all it is important to note that *Jahangir Siddiqui & Company along with the Shaikh family is the major shareholders In Azgard Nine Limited with a cumulative shareholding of more than 50%.* Ali Jehangir Siddiqui is the common director in both Jahangir Siddiqui & Company Limited and Azgard Nine Limited.

JS GROUP COMPANIES AND FUNDS

5.4.2 Jahangir Siddiqui & Company Limited (JSCL) has been incorporated as an 'Investment Advisory' on May 4, 1991. The 2007 annual statement of Jahangir Siddiqui and Company shows their strategic interest in the following mentioned companies, which are also participants in our above mentioned 'Group':

- JS Bank
- JS Investment (Former JS ABAMCO) and all five funds managed under JSIL.
- Azgard Nine Limited
- JS Global Capital (the major Brokerage House involved in ANL trading).

Following are the board of directors of Jahangir Siddiqui & Company Limited and its associate companies JS Bank, JS Global and JS Investments Limited as per their annual reports of 2007:

JAHANGIR SIDDIQUI & Co Ltd		(Holding Company)	
Mr. Mazhar-ul-Haq Siddiqui		Chairman,	
Mr. Munaf Ibrahim		Chief Executive Officer	
Mr. Ali J. Siddiqui		Director	
Mr. Ali Raza Siddiqui		Director	
Mrs. Syed Nizam Ahmed Shah		Independent	Director
Mr. Chief Justice (R) Mahboob Ahmed		Independent	Director
Mr. Siraj Ahmed Dadabhoy		Independent	Director
Mr. Adil Matcheswalla		Independent	Director
Mr. Nauzer Aspi Dinshaw		Director	
JS BANK			
Mr. Jahangir Siddiqui	Chairman		
Mr. Mazhar-ul-Haq Siddiqui			
Mr. Maqbool A. Soomro			
Mr. Ashraf Nawabi			
Mrs. Rafique R. Bhimjee			
Mr. Syed Amjad Ali			
Mr. Basir Shamsie			
		JS GLOBAL CAPITAL (Brokerage House)	
Mr. Adil Matcheswalla	Mr.	Chairman, Non - Executive Director	
Omar M. El-Quqa	Mr. G.M.	Vice Chairman, Non - Executive Director	
Malkani	Mr. .Asiam Khaliq	Chief Executive	
Mrs. Maha K. Al Ghunaim		Non - Executive Director	
Mr. Eyad N. Abu-Huwaij		Non - Executive Director	
Mr. Syed Nadir Shah	Mr.	Non - Executive Director	
Ahsen Ahmed		Non - Executive Director	
Non - Executive Director			

5.4.3 Jahangir Siddiaui and Sons Pvt Limited (JS Sons) incorporated on August 04, 2005 with a purpose to invest in shares and securities. Jahangir Siddiqui is one of the major shareholders, having 98% shareholding and also a director as per the information submitted by the company on November 3D,

Bank. The	JS INVESTMENTS LIMITED (Asset Management Company)	2007. Jahangir Siddiqui is also a director in JS board of Directors of JS Sons is as following:
	<div> <div>Mr. Munawar Alarm Siddiqui Mr. Muhammad Najam Ali Mr. Ali Raza Siddiqui Mr. Nazar Mohammad Shaikh Mrs. Sher Afghan Zuhair Siddiqui Mr. Lt. General (R) Masood Parwaiz Mr. Sadeq Sayeed</div> <div>Chairman Chief Executive Executive Director Non - Executive Director Non - Executive Director Non - Executive Director Non - Executive Director</div> </div>	

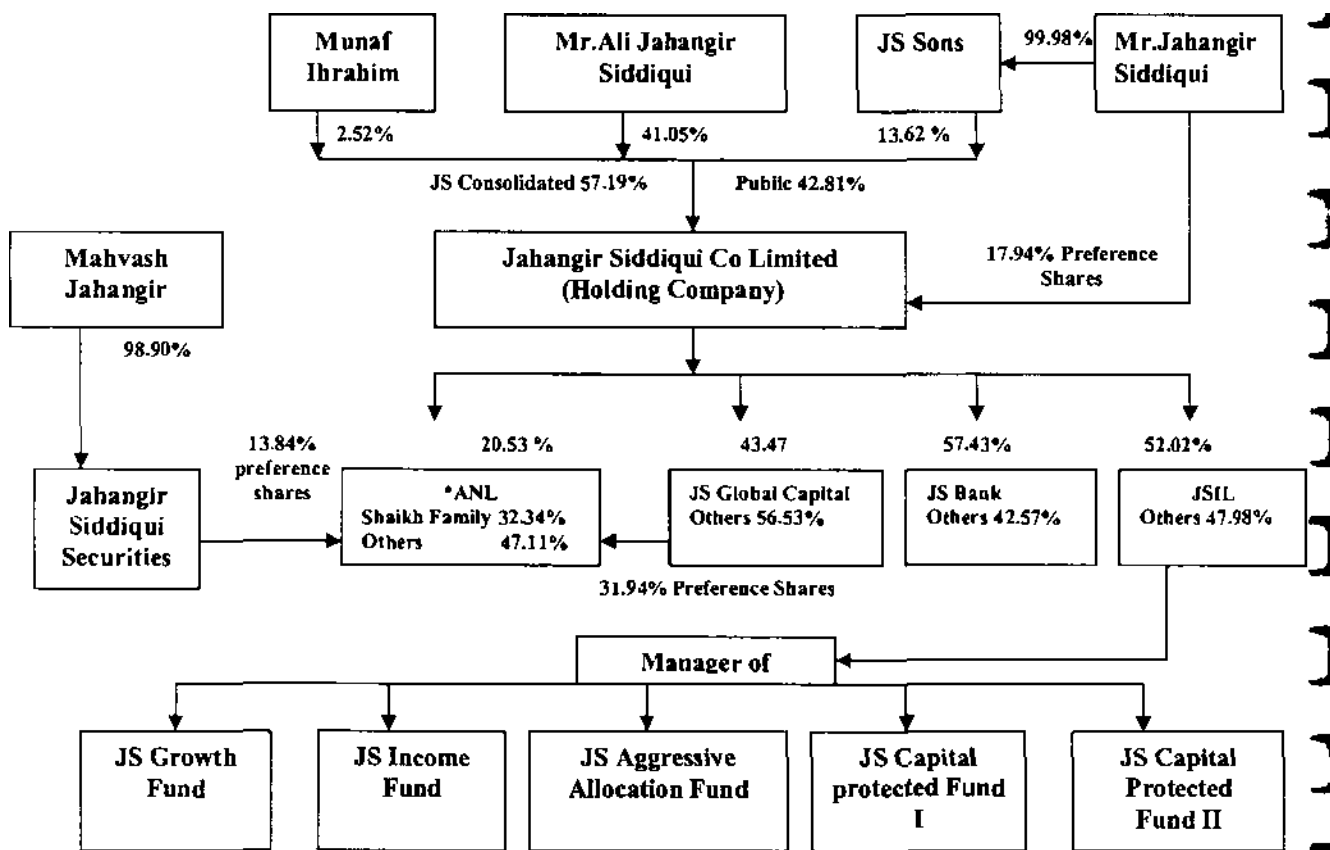
Mr. Jahangir
Siddiqui Mr.
Suleman Lalani
Mr. Muhammad Suleman Kanjiani Director

5.4.4 JS Investments Limited {former JS Management Company} on February 22, 1995. Following are the ANL Price manipulation and are managed by JS Investments (JS ABAMCO):

- a) JS Growth Fund formerly UTP Growth Fund
- b) JS Aggressive Allocation Fund formerly UTP Aggressive Assets Allocation Fund
- c) JS Income Fund formerly UTP Income Fund
- d) JS Capital Protected Fund
- e) JS Capital Protected Fund II

5.4.5 Jahangir Siddiaui Securities Services Limited. JS Securities incorporated on April 14, 1994, under the classification of 'Brokerage House'. Mrs.Mahvash Jahangir Siddiqui is the major shareholder of the company, while Abdul Hamid Dagia is one of the Directors of the company as per the information submitted by the company on June 29, 2007. Mr.Dagia has been identified as potential beneficial owner of Muhammad Iqbal client of Aziz Fida Hussein. The board of Directors of JS Securities is as following:

Mr. Sheikh Muhammad Abdullah	Chief Executive Officer	Mr. Tariq Usman Bhatti	Director
Mr. Abdul Hameed Dagia		Director	



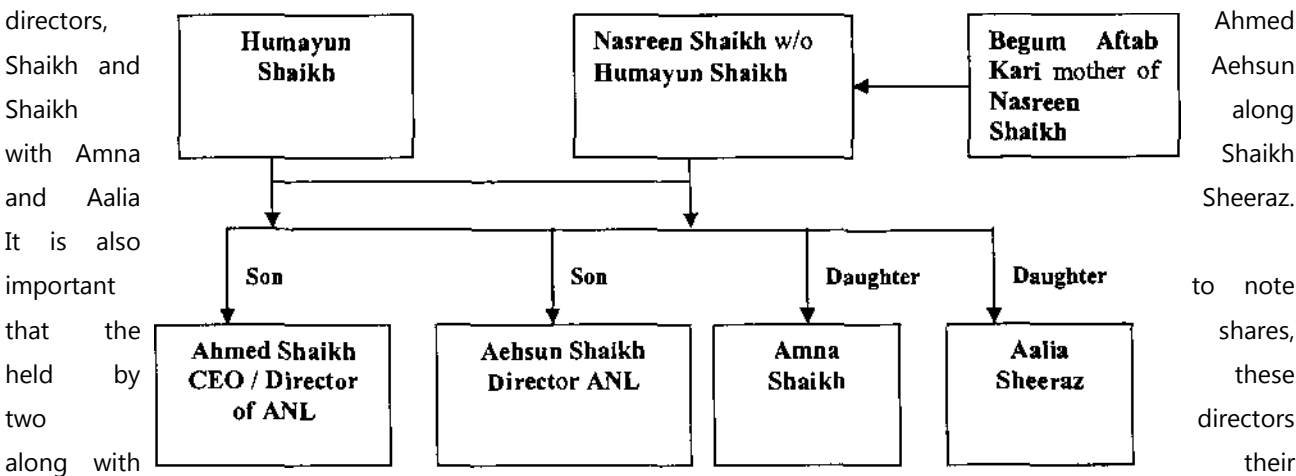
The detail pattern of cross shareholding has been provided in Annexure 5.4.1;
 *JSCL holding in ANL increased to 24.36% during the periods under review.

SHAIKH FAMILY (SPONSORS OF ANL)

5.4.6 The Shaikh family is the largest stake holder in Azgard Nine Limited and owned almost 30% of the shareholding at the start of first review period i.e April 02, 2007. This holding increased up to 36% of total ordinary shares as on April 30, 2008. The family consists of following members:

- (a) Nasreen H. Shaikh
- (b) Humayun Naseer Shaikh
- (c) Ahmed Shaikh
- (d) Amna Humayun Shaikh
- (c) Aalia Sheeraz Monnoo
- (e) Begum Aftab Kari

All the above mentioned names are the clients of JSGL. According to the CNIC data fetched from NADRA data base it has been found that Mr. & Mrs. Humayun Shaikh are the parents of both the



mother Ms. Nasreen Humayun Shaikh make them the largest shareholders in Azgard Nine Limited. Nasreen Humayun Shaikh is one of the beneficial owners (owning more than 10 %) of ANL shares. The last member of the family Begum Aftab Kan has been identified as mother of Nasreen Shaikh and thus a relative of all other family members.

Humayun Shaikh, the head of the family is a joint account holder with two of his daughters and has been co-authorized in his wife and son's trading account opening forms, while in Begum Aftab Kari account, he has identified as her nominee. He is also an authorized person to operate the bank accounts of Amna, Aalia and Begum Kari (who is reportedly expired during the period).

Using different accounts of aforementioned family members, the Shaikh family has done huge trading during both review periods. By virtue of cross trading among the family members, the ownership of shares remained in the family, which also used to transfer shares as 'Free Deliveries' to each *other* through CDS.

Therefore, there is no actual change of beneficial ownerships, their trading simply leads to change of hands and caused to generate artificial trading in the scrip of ANL. 10.610.500 numbers of shares were traded as cross trades amongst the family members during both the review periods. The details of total trading done by the Shaikh family and their cross trading have been provided in Annexure 5.4.6.

Mr.Ahmed Shaikh as CEO and Director of ANL was bound to declare the profit of Rs.3.3 million during the second review period, which he was failed to declare under the section 224 of Company Ordinance 1984.Detail has been covered under the individual head of Ahmed Shaikh.

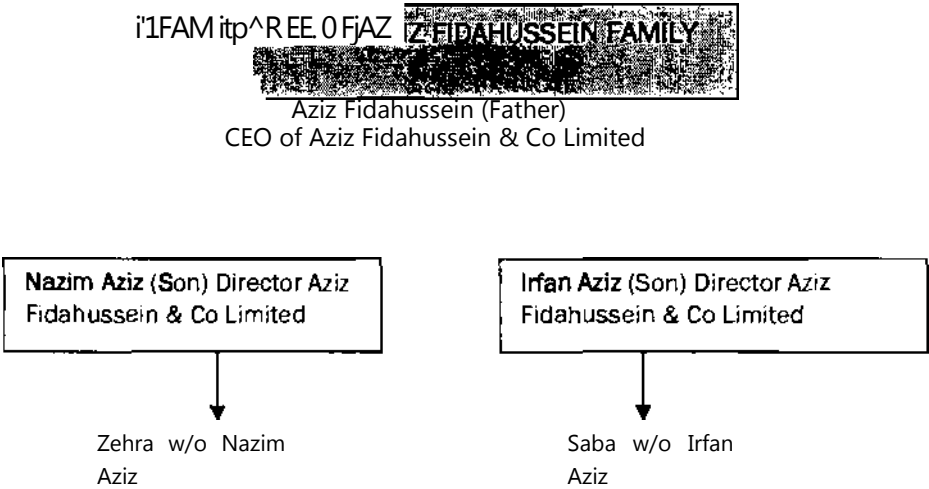
Aziz Fidahussein Brokerage House and his family members

5.4.7 Ms.Zehra Nazim Aziz and Ms.Saba Irfan Aziz are among the major traders, during both the review periods. Both of them are clients of Aziz Fidahussein & Co Limited and have also identified as daughters-in-law of Mr. Aziz Fidahussein, CEO of AFH & Co Limited. The account opening forms of Zehra and Saba showed them 'House-wives'.

Following are the Board of Directors of Aziz Fidahussein & Co:

Mr. Aziz Fidahussein	Chairman
Razia Aziz	Non-Executive Director
Sarfraz Aziz	Executive Director
Irfan Aziz	Executive Director
Nazim Aziz	Executive Director
MahnazAziz	Non-Executive Director

Irfan Aziz s/o Aziz Fidahussein is one of the Directors of AFH & Co Ltd. He is an authorized person to operate the trading account and related financial transactions of Zehra Nazim Aziz. Further, he is husband Saba Irfan Aziz and nominee of her trading account, while a joint account holder in both of her bank accounts. Since both Zehra and Saba are housewives, it is very likely that Irfan Aziz is responsible to use both the accounts of his family members along with the proprietary trading done by AFH & Co Ltd in the shares of ANL.



FRONT OF JS GROUP OFFICIALS

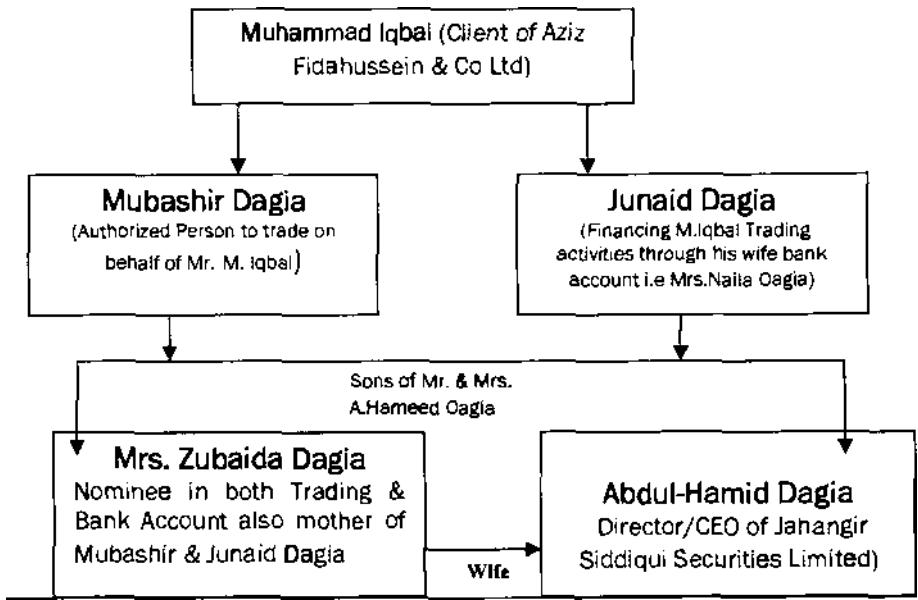
5.4.8 The following clients have been found in business association with JS Group:

MEHBOOB KALYAR: He is an employee of JS Group and has been working as PA to Jahangir Siddiqui.
MASHOOQ KALYAR: He is the brother of Mehboob Kaiyar.
SHAZIA SADIQ: She is the wife of an employee of JS Group, Sadiq Patni. The financial transactions show a link between the said client and Munaf Ibrahim, CEO of JSCL.

5.4.9 MUHAMMAD IQBAL has been identified as the front man of Abdul-Hamid Dagia and famiiy. Mr. Dagia has been a director in Jahangir Siddiqui and Securities Services. The information gathered from M.Iqbai account opening form reveals that Mubashir Ha meed Dagia is an authorized person to use his account, while Mrs.Zubaida Dagia is nominee of his account. The e-mail contact provide in his account opening form is ahdagia@email1.com.

Further, it has mentioned in his account opening form that the account has been opened C/O Mr.Sarfraz, who is son of Aziz Fidahussein, the CEO of Aziz Fidahussein & Co; the contact address of M.Iqbai also reveals the same address as of Aziz Fidahussein & Co.

The financial links covered in detail in section 5.7, later in the report reveals that M.Iqbai total trading was financed through Ms. Naila’s Account wife of Junaid Dagia, another son of Abdul Hameed Dagia. Junaid Dagia is CEO and Director in Technology Trade (Pvt) Ltd. The company is a share registrar company of all JS Group companies i.e JSCL, JS Global, JS Bank and JS Investments Limited. The company board of directors also includes Abdul Hameed Dagia, Mubashir Dagia and Haris Dagia. The following table reveals his relationship with Dagia Family:



FRONT OF SHAIKH FAMILY

- 5.4.10 MUHAMMAD UAZ: is a JS Global client. His bank account's information reveals that he is an employee of Azgard Nine Limited and has also authorized Humayun Shaikh, Ahmed Shaikh and Aehsun Shaikh to use his bank account, where major proceedings from ANL transaction were taken place.
- 5.4.11 MUHAMMAD RIAZ: has been identified as client of JS Global Capital and his bank account information and financial transactions indicate his links with Shaikh family.

CLIENTS/ASSOCIATES OF JS GROUP

- 5.4.12 CROSBY DRAGON FUND (CDF):

Crosby Dragon Fund is an open end fund established under a trust deed, executed on September 20, 2003 between Crosby Assets Management (Pakistan) Limited as management company and JS Bank Ltd (Formerly Jahangir Siddiqui Investment Bank Limited) as Trustee. Crosby Assets Management Pakistan which is also established in 2003 is wholly owned by the Crosby Asset Management Inc. an asset management group. Crosby Asset Management Inc. is listed on the London Stock Exchange's AIM and is part of Crosby Capital Limited, an independent merchant banking group.

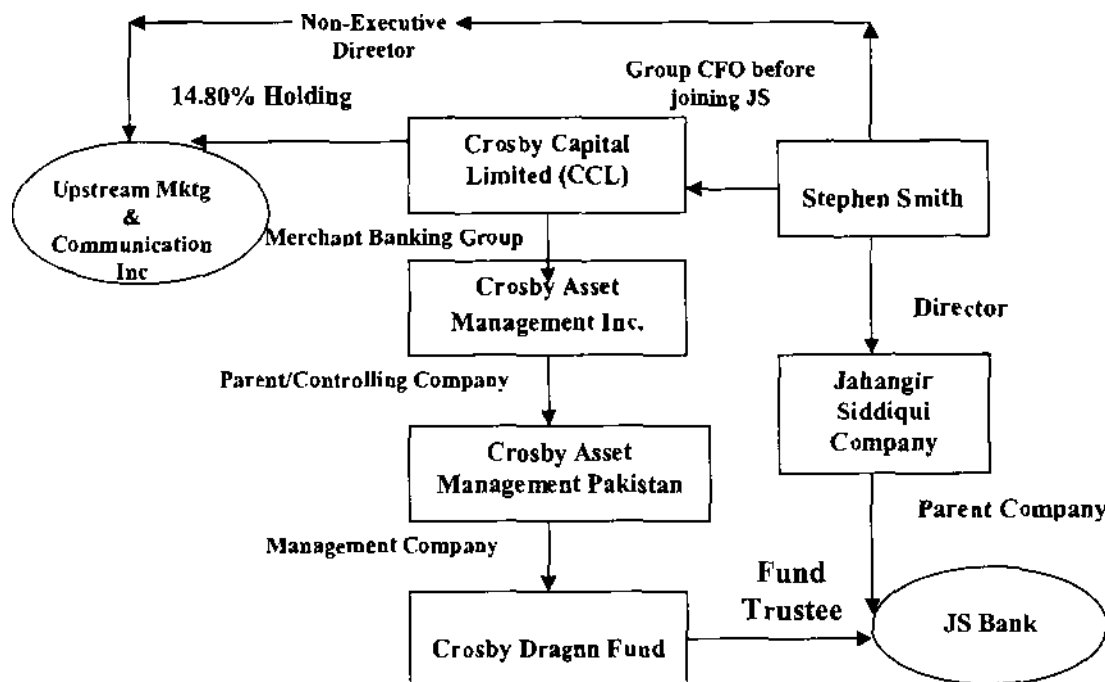
CLJ- is not only a client of JSGL but also have a multi dimensional business association with JS Group. JS Bank not only a trustee of the fund but also a distributor along with Jahangir Siddiqui Company.

Stephen Smith works for the JS Group, he sits on several JS boards including the holding company (Jahangir Siddiqui & Co Ltd), its international mutual funds and private equity business. Prior to JS, Stephen worked at Crosby Tech Pacific Capital, (now renamed Crosby Capital Limited or "CCL"), an investment holding company based in Hong Kong where he became Group CFO before joining JS.

In Regulatory Announcement on June 06, 2008 by London Stock Exchange, Stephen Smith has joined 'Upstream Marketing and Communication Inc' (UPS) as non-executive director. Crosby Capital Limited (CCL) is a 14.8% shareholder of UPS.

Further, as per the Jahangir Siddiqui and Co Ltd Annual Report 2007, Ali Jahangir Siddiqui (currently a Director in JSCL) was also a Director with Crosby, the Investment and Merchant Bank, and was based in Hong Kong





The supporting documents of the aforementioned information have been provided in [Annexure 5.4.12](#).

5.4.13 SAAD FAROOQUI:

Saad Farooqui is a close associate of JS Group. He is currently running a company 'Optimus Limited* in partnership with JS Private Equity Fund 1 LLC, owning 48% and 52% shares respectively. Mr-Ali Jahangir Siddiqui and Mr. Stenhen Smith are on Company's board along with Saad Saeed Farooqui.

Both Ali Jahangir Siddiqui and Saad Farooqui are the graduates of Cornell University (USA). Saad Farooqui has managed Mustang Securities Services (Pvt) Ltd, his family owned security services company. Mr.Ali Jahangir Siddiqui has been one of the Directors of the same company since December 1999 to December 2002.

He has also served on the board of directors of several listed and unlisted companies of JS Group:

- | | | |
|-----|-------------------------------------------|-------------|
| (a) | Jahangir Siddiqui Investment Bank Limited | (Listed) |
| (b) | Dadex Eternit | (Listed) |
| (c) | Al-Abbas Industries | (Un-listed) |
| (d) | Cinepax Limited | (Un-listed) |

The supporting documents of the aforementioned information have been provided in [Annexure 5.4.13](#).

5.4.14 SYED NIZAM SHAH: He is on Board of Directors of Jahangir Siddiqui Company Limited and holds 61,673 number of JSCL shares.

5.4.15 RUBINA MALKANI: She is the wife of GM Malkani, the CEO of JS Global Capital Limited.

5.4.16 MS .ZAIBUNNISA (ZB):

Mrs. Zaibunnisa has also been identified as client of JS Global Capital. She is 50 years old 'House Wife' living in Meethadar Karachi. The brokerage house account opening form reveals that ZB maintains a single account, her husband Noor Muhammad as nominee, with JS Global, while she has joint bank account with Ahmed Abdul Razzak in JS Bank, who also lives in the same vicinity of Meethadar (as per CNIC info).

Ahmed Abdul Razzak has also signed JS Global account opening form of ZB as witness and 'Introducer'⁷. It is learnt during the investigation that Mr. Razzak has been working with JS Group in the capacity of a 'Stock Dealer'.

It has been covered in the Financial Section of ZB that all the money transactions were carried out through Ahmed Razzak in form of CASH transactions, leaving fewer clues where the money transferred from the Joint account of ZB and Ahmed, received in form of ANL and other scrips proceeds from JS Global Capital.

5.4.17 Following are the clients of JS Global Capital, The Commission views the role of the following mentioned clients of the Group as indirect and secondary in nature. The said Group members prima facie facilitated the scheme of price manipulation and may have permitted their trading/ CDS / bank accounts to be used for the subject purpose. The names and activities of these persons are, however, made part of the investigation report, as failing to make a reference to the same would result in an incomplete picture of the scheme designed to manipulate the price of the subject share.

Khalid Rafi: working as Chairman System innovations (Si3).

Rashid Siddiqui: is a retired army personnel traded only in the scrip of ANL JSCL and has found involved in wash trades.

Muhammad Ibrahim: Client of JS Global, his account was used to carry out the wash trades/circular trades among the Shaikh family members.

Muhammad Asif Mendha:

He is the client of Live Securities and the biggest trader in the scrip of ANL during the second review period. His bank account statement and financial transaction indicate his link with Irfan Amanullah, Company Secretary of Attock Cement. His funds movement from his bank account also creates his links with his brokerage house 'Live Securities' **5.4.18** and its CEO Ashraf Dossani. It is pertinent to mention here that Irfan Amanullah has been identified as cousin of Ashraf Dossani,

The supporting documents for Attock Cement Corporate information and Irfan Amanullah CNIC have been provided in Annexure 5.4.18.

5.5 How Market Manipulation was achieved?

5.5.1 PUMPING AND DUMPING

In order to artificially inflate the price of ANL, the group used the technique of “pumping and dumping”. The following table reveals the large quantities bought and sold by the Group. Date wise Group Break up has been provided in Annexure 5.5.1:

AZGARD NINE LIMITED BUYING AND SELLING DETAILS									
		FIRST SURGE				SECOND SURGE			
		APRIL 02 TO JULY 13 2007				NOV 29 TO APRIL 22 2008			
S.NO	NAME	BUY VOLUME	SELL VOLUME	Client Buy	Client Sell	BUY VOLUME	SELL VOLUME	Client Buy	Client Sell
				**%wrt total Mkt-Vol during the review period	%wrt total Mkt-Vol during the review period			**%wrt total Mkt-Vol during the review period	%wrt total Mkt-Vol during the review period
1	SAAD SAEED FARUQUI	27,359,500	17,617,500	10.35%	6.67%	20,005,500	21,284,500	3.54%	3.77%
2	ZEHRA	18,473,000	19,235,500	6.99%	7.26%	11,301,500	11,378,500	2.00%	2.01%
3	JAHANGIR SIDDIQUI & COMPANY LIMITED	11,920,500	-	4.51%	-	-	-	0.00%	0.00%
4	SHAZIA	11,289,500	10,389,500	4.27%	3.93%	6,951,000	6,951,000	1.23%	1.23%
5	GROSBY DRAGON FUND	7,081,000	5,610,500	2.68%	2.12%	19,251,000	19,252,000	3.41%	3.41%
6	JAHANGIR SIDDIQUI & SONS (PRIVATE) LIMITED	6,181,000	113,500	2.34%	0.04%	-	9,679,500	0.00%	1.71%
7	MUHAMMAD IQBAL	6,133,000	5,022,500	1.70%	1.90%	-	-	-	-
8	AMNA SHAIKH	2,755,500	2,320,000	1.04%	0.88%	-	-	-	-
9	SYED NIZAM SHAH	2,315,500	2,315,500	0.88%	0.88%	-	-	-	-
10	KHALID RAFT	2,226,500	2,226,500	0.84%	0.84%	-	-	-	-
11	AALIYA SHEERAZ MONNDD	2,200,000	-	0.83%	-	-	-	-	-
13	JS BANK LIMITED	252,500	2,041,500	0.10%	0.77%	-	1,700,000	0.00%	0.30%
14	MEHBOOB KALYAR	1,531,500	2,621,500	0.58%	0.99%	-	-	0.00%	0.00%
15	RUBINA MALKANI	1,259,000	1,279,000	0.48%	0.48%	1,915,000	1,915,000	0.34%	0.34%
16	MUHAMMAD IBRAHIM	1,115,500	1,115,500	0.42%	0.42%	-	-	-	-
17	MASHOOQ KALYAR	1,087,000	12,000	0.41%	0.00%	-	-	-	-
18	JAHANGIR SIDDIQUI SECURITIES SERVICES LIMITED	1,075,000	1,075,000	0.41%	0.41%	11,004,000	-	1.95%	0.00%
19	BEAGUM AFTAB KARI	729,500	9,613,000	0.28%	3.26%	9500	990,000	0.00%	0.16%
20	NASREEN HUMAYUN SHEIKH	650,000	-	0.25%	0.00%	4,709,500	4,700,000	0.83%	0.83%
21	MUHAMMAD ASIF MENDHRA	-	-	-	-	27,353,500	23,526,000	4.84%	4.16%
22	SABA	-	-	-	-	10,877,000	11,968,500	1.92%	2.12%
23	MUHAMMAD RIAZ	-	-	-	-	9,104,500	6,095,500	1.81%	1.08%
24	RASHID SIDDIQUI	-	-	-	-	7,402,000	7,452,000	1.31%	1.32%
25	ZABUNNISA	-	-	-	-	5,385,000	5,385,000	0.95%	0.95%
26	MUHAMMAD UAZ	-	-	-	-	4,404,000	3,663,500	0.78%	0.65%
27	JS INVESTMENTS LIMITED-ABAMCO	-	-	-	-	3,485,000	6,366,000	0.62%	1.13%
28	JS INCOME FUND-UTP INCOME FUND	-	-	-	-	2,925,000	124,000	0.52%	0.02%
29	AZIZ FIOAHUSEIN & COMPANY (PRIVATE) LIMITED	-	-	-	-	2,852,000	3,719,000	0.50%	0.66%
30	HUMAYUN NASEER SHEIKH	-	-	-	-	2,100,000	2,100,000	0.37%	0.37%
31	AHMEQ HUMAYUN SHEKH	-	-	-	-	1,700,000	1,700,000	0.30%	0.30%
32	JS GROWTH FUND-UTP GROWTH	-	-	-	-	1,100,000	500,000	0.19%	0.09%
33	JS CAPITAL PROTECTED FUNDO II	-	-	-	-	114,000	4,270,500	0.02%	0.76%
34	JS AGGRESSIVE ASSET ALLOCATION FUNDO	-	5,307,000	-	2.01%	-	-	-	-
35	JS CAPITAL PROTECTED FUNDO	-	-	-	-	-	546,500	0.00%	0.10%
	TOTAL VOLUME	105,635,000	86,915,500	39.87%	32.88%	153,948,000	155,265,000	27.23%	27.4%

** Total Market Volume was 264,342,995 and 565,127,119 shares during First and Second Review period respectively.

5.5.2 PRICE RAMPING

As a part of this technique, general public holding shares were induced to purchase the shares of ANL at increasingly higher prices by giving an impression of increased liquidity and activity in the trading of the scrip. The following tables reveal the data of selected dates from both the review periods, when the price was closed on upper lock.

The Group members trading activity was creating an impression of high price surge and liquidity in the ANL scrip by trading large quantities of shares (more than 50% of the market) and placing the orders on increasing queued prices:

								JSEBROUPE W ^iE^Xcrivity:-FOI						
Date	Open	High	Low	Close	Total Turnover	Price Change	% Change	Group Member	Member Volume	Buyer's Mkt w.r.t	Min QP	Max QP	Rating	
18-4-07	24.1	25.3	23.9	25.3	4,716,000	1.2	4.98%	Crosby Dragon	964,500	20.45%	25.1	25.3	0.2	
								Saad Farooqui						
19-4-07	25.3	26.55	25.3	26.55	6,357,500	1.25	4.94%	Shazia Sadiq	1,572,500	24.73%	25.3	26.5	1.25	
								Saad Farooqui	713,500	11.22%	25.9	26.6	0.65	
										96*1				
27-4-07	27.35	28.7	28.1	28.7	6,186,500	1.35	4.9%	Saad Farooqui	2,681,000	43.34%	28.5	28.7	0.25	
										43 34% t				
3-5-07	28.9	30.3	28.4	30.3	9,364,500	1.4	4.84%	Saad Farooqui	5,494,000	58.67%	28.9	30.3	1.4	
								Shazia Sadiq	1,271,500	13.58%	28.5	30.3	1.85	
11-5-07	31.55	33.1	30.7	33.1	4,659,500	1.55	4.91%	Zehra	2,050,000	44.00%	31.7	33.1	1.45	
13-6-07	36.7	38.5	37	38.5	9,020,000	1.8	4.90%	JSSons	3,040,500	33.71%	37.9	38.5	0.65	
								JS Securitie	1,075,000	11.92%	37.1	38.4	1.3	
								Zehra	1,403,500	15.56%	37.8	38.5	0.7	
12-6-07	50.3	52.8	48.7	52.8	4,199,000	2.5	4.97%	M.Iqbai	1,618,000	38.53%	49.5	52	2.5	
								Saad Farooqui	943,500	22.47%	49	52.8	3.8	
										ei.00% -				
6-12-07	37.6	39.45	37.9	39.45	11,098,000	1.85	4.92%	Zehra	6,000,000	54.06%	39.5	39.4	0.05	
								Crosby Dragon - Fimff	1,332,000	13.32%	39.1	38.7	0.8	
12-12-07	44	46.2	44	46.2	7,759,000	2.2	5.00%	Zehra	1,509,500	19.45%	45	46	1	
								Saad Farooqui	1,083,000	13.96%	44.5	46	1.5	
										i3Mi9g				

*4

MARKET DATA FOR REVIEW PERIOD 2 *r.Ig											R£yiEWJ*ER10D2T		
Date	Open	High	Low	Close	Turnover	Price Chan g	• % Chang ■ e	‘ r , ^’ . • < i’ ■ ‘ ‘ ‘ Group Mem	Mem Buy Vol	% w.r.t - Mkt	Min QP	Max QP	i
3-1-08	40.85	42.85 —	—42 -	- 42τ85	-1-955,000	-.... 2 .	4.90%	Crosby Drapoa£u»d-	—950,00©'''	"48759%~	42.0	42.0	
										m			
9-1-08	49.5	51.95	49	51.95	12,888,500	2.45	4.95%	JS Securities	5,681,000	44.08%	51.0	52.0	
								Agtf Monriha	912,000	7.08%	50.3	51.5	
29-2-08	54.1	56.8	55.1	56.8	7,855,500	2.7	4.99%	Stiazia Sadiq	1,942,000	24.72%	55.1	56.8	
								Asif Mondha	1,000,000	12.73%	55.7	56.8	
										m			
3-3-08	56.8	59.6	57.5	59.6	10,145,000	2.8	4.93%	Stiazia Sadiq	1,759,000	17.34%	57.5	59.6	
								Asif Mendha	1,652,000	16.28%	58.7	59.6	
10-3-08	56	58.8	56	58.8	7,392,500	2.8	5.00%	Crosby Dragon	^l',01gg0CH	■*4.^84%	-W- iU.	^58.8	
								Saad Farooqui	1,301,000	17.60%	58.8	58.8	
								Shazia Sadiq	663,000	8.97%	56.0	58.8	
1-4-08	67.35	70.7	65.7	70.7	15,102,500	3.35	4.97%	Crosby Diiijxn	-2?reoxinn"				
								Saad Farooqui	1,740,000	11.52%	69.5	70.7	
								Zalbunisa	1,000,000	6.62%	66.0	66.5	



5.5.3 CROSS TRADING:

For this purpose, large volumes of shares of ANL were traded within the group. Analysis of the trading pattern clearly reflects that substantial quantity of ANL shares was changing hands between persons who had some common connection between them. Day wise Cross /wash trade has been provided in Annexure 6.1.1 to 6.35.1

Following tables provide the simultaneous trades (Cross trades) of each member of the Group, the details have been provided under individual client's name:

	; Cross Buy amppg Group mem	bereDuringiIR 3\$ii'-rrpf. -■ - ,V/j ■■■■■#■■■•KL.-'- 1 ; N ^ j - - ■ yrtv.iS ^ ^ aJB ^ ^ nngjT	m88M ^Gcdup Crosses 30	m88M m88M^SM^
1	Aalia Sheeraz Monnoo v'''	2,200,000	2,200,000	100.00%
2	Mehboob Kalyar v'	1,531,500	1,482,500	96.80%
3 ----	-frtatiammacJ Ibidlrinr	1,115,500	1,026,000	91.98%
4	Jahangir Siddiqui Investment Bank	252,500	222,500	88.12%
5	Muhammad Iqbal v"	6,133,000	5,327,000	86.86%
6	Amna Shaikh	2,755,500	2,004,000	72.73%
7	Zehra Nazim Aziz ^	18,488,000	12,131,000	65.62%
-8 ----	■ KTIalkTfrdTi	2,226,500	1,420,500	63.80%
9	Jahangir Siddiqui & Sons (Private) Limited	6,181,000	3,263,000	52.79%
10	Crosfjy~Bra'gtmTtmti	7,081,000	3,53,6,500	49.66%
11	Jahangir Siddiqui & Co Ltd v	11,920,500	5,859,500	49.15%
12	8egum Aftab Kari	729,500	339,000	46.47%
13	Jahangir Siddiqui Securities Sen/ices v	1,075,000	468,000	43.53%
14	Shazia Sadiq v-	11,289,500	4,669,500	41.36%
±5	RubtrcrMattami	1,259,000	419,500	33.32%
16	Syed Nizam Shah ^	2,315,500	637,500	27.53%
17	Saad Saeed Faruqui v	27,359,500	5,280,000	19.30%
IS ----	■ MasfToacf-Kaiyaf	1,087,000	62,000	5.70%
			s&mmm	mMm

S.NO	Cross Seljampng*G^u^me	mpersDunng>F.irs		ft o iv,jrtj i'j r *
1	Jahangir Siddiqui Securities Services	1,075,000	1,054,000	98.05%
2---	■M uhann iidUiUdfilii i	1,115,500	1,030,000	92.34%
3	Mehboob Kaiyar	2,616,500	2,044,000	77.97%
4	Begum Aftab Kari	8,613,000	6,711,000	77.92%
5	Syed Nizam Shah	2,315,500	1,600,000	69.10%
6	Saad Saeed Faruqui	17,617,500	12,056,500	68.43%
7	JS Aggressive Allocation Fund	5,307,000	3,492,500	65.81%
8	JS Bank Limited	2,041,500	1,306,000	63.97%
9	Amna Shaikh	2,320,000	1,465,500	63.17%
10	Shazia .	10,389,500	6,494,500	62.51%
11	Zehra Nazim Aziz	19,235,500	11,467,000	59.61%
42---	■ RubiTia"Maikdiii	1,279,000	285,500	22.32%
13	Crosby DraguifTtffld	5,610,500	1,0915,000	19.53%
44---		2,226,500	2^5,500	10.13%
		AWWISKsgJ'SEJS		mmm

S.NO	muMi	MS-	SIBis	tu
1	Humayun Naseer Sheikh	2,100,000	2,055,000	97.86%
2	Nasreen Humayun Sheikh	4,709,500	3,800,000	80.69%
3	Jahangir Siddiqui Securities Services	11,004,000	8,868,000	80.59%
4	JS Income Fund	2,925,000	2,325,000	79.49%
5	Ahmed Humayun Shaikh	1,700,000	1,255,500	73.85%
6	Aziz Fidahusein & Co(Pvt) Ltd	2,852,000	1,663,500	58.33%
7	Zaibunisa	5,385,000	3,130,500	58.13%
8	Zehra Nazim Aziz	11,301,500	6,303,500	55.78%
\$-----	TroyLiy Diagon-Fu«d---	19,251,000	10,302,500	53.52%
10 ____	-Ekjbina-Metiorci	1,915,000	960,000	50.13%
Mr--	' Rashid SiddiqDi	7,402,000	3,564,500	48.16%
12	JS Growth Fund	1,100,000	498,000	45.27%
13	Saad Saeed Faruqui	20,005,500	8,639,500	43.19%
14	Shazia Sadiq	6,951,000	2,971,000	42.74%
1*>	MuTiammad-Acif Mondha	27,353,500	11,459,500	41.89%
16	JS Investments Limited	3,485,000	1,235,500	35.45%
17	Saba Irfan Aziz	10,877,000	3,281,500	30.17%
18	Muhammad Riaz	9,104,500	2,455,000	26.96%
19	Muhammad Ijaz	4,404,000	1,146,500	26.03%
20	Aalia Shiraz	757,000	89,000	11.76%
21	JS Capital Protected Fund II	114,000	10,000	8.77%
;		wnm		KHht

	CrpssSeifamqngGroupmef	TfceMfapjSpsS	0-a	RBrailiSl
		^Ppviewpenod.v.*'-	Wmmmm	
1	Humayun Naseer Sheikh	2,100,000	2,100,000	100.00%
2	Ahmed Humayun Shaikh	1,700,000	1,700,000	100.00%
3	JS Capital Protected Fund	546,500	546,500	100.00%
4	JS Capital Protected Fund II	4,270,500	3,426,500	80.24%
5	Nasreen Humayun Sheikh	4,700,000	3,310,500	70.44%
6	Begum Aftab Kari	990,000	689,000	69.60%
7	Aziz Fidahusein &Company	3,718,000	2,343,500	63.03%
8	Saad Saeed Faruqui	21,284,500	13,105,500	61.57%
9	Jahangir Siddiqui & Sons (Pvt) Ltd	9,679,500	5,471,000	56.52%
10	Muhammad Riaz	6,095,500	3,410,000	55.94%
u_.	RasbidS^d^qtH-*	7,452,000	4,092,500	54.92%
12....	CrosfayDrogon Fund -	19,252,000	9,310,000	48.36%
13	Shazia Svi. ■*/	6,951,000	3,171,500	45.63%
14	Zaibunisa	5,385,000	2,434,500	45.21%
15	Zehra ./'A	11,378,500	4,669,000	41.03%
16	MuhammadTjaz	3,663,500	1,451,500	39.62%
17	JS Bank Limited	1,700,000	661,500	38.91%
18	Muhammad Asif Mendha	23,525,000	8,704,000	37.00%
19	JS Growth Fund	500,000	181,500	36.30%
20----	- Rubina Malkani	1,915,000	511,000	26.68%
21	Saba V< fAjt. fc?*V	11,968,500	3,069,500	25.65%
22	l\ 'Q w	6,366,000	1,639,500	25.75%
23	JS Investments Limited JS Income Fund	124,000	15,000	12.10%
* : .		;4f;i^l55,265,bCK)^		Il\$iaS6lli

The following table reveals the explicit cross trades among the Shaikh family members during the first review period:

SHAIKH FAMILY WASH TRADES

All the members of Sheikh Family maintain their trading accounts with JS Global Capital Limited; the following table reveals the trading links among the family members:

Account Holder	Linked Account	Trading Partner	Remarks
Begum Aftab Kari	<ul style="list-style-type: none">Humayun ShaikhNasreen Shaikh	Nil	Humayun Shaikh is Nominee in BAK account. While BAK has allegedly expired Humayun Shaikh is the ultimate beneficiary of her account.
Amna Shaikh	Nil	<ul style="list-style-type: none">Humayun Shaikh	Nil
Aalia Shaikh	Nil	<ul style="list-style-type: none">Humayun ShaikhNasreen Shaikh	Nil
Humayun Shaikh	<ul style="list-style-type: none">Ahmed ShaikhAehsun ShaikhNasreen Shaikh	Nil	Nil
Nasreen Shaikh	<ul style="list-style-type: none">Ahmed ShaikhAehsun ShaikhHumayun Shaikh	Nil	Nil
Ahmed Shaikh	<ul style="list-style-type: none">Humayun ShaikhNasreen ShaikhAehsun Shaikh	Nil	Nil

Keeping in view the above mentioned relationships of Humayun Shaikh, it is our belief that he is the common beneficial owner of BAK, Amna Shaikh and Aalia Shaikh accounts, so that any kind of trading among the Shaikh family members does not change the beneficial ownership of ANL shares and thus lead to occurrence of wash trades.

In addition to this, free deliveries among the Shaikh family members have also been observed in the CDS system, which are not supported by any underlying transaction. Since the family members can transfer shares to each other’s account with out doing any actual buy or sale, any trade among the family member executed on KATS was not justified as genuine trade rather it will be considered as wash sale with a

5.5.4 WASH TRADES:

Besides Cross trades, wash trades were also noted among the Group members.

malafide intention to mis-lead the common public.

The following table reveals the explicit cross trades among the Shaikh family members during the first review period:

EXPLICIT CROSS OF SHAIKH FAMILY TRADES IN AZGARD NINE LIMITED :									
Date	Time	Ticket	Order	Mem	Client Name	Counter-Mem	Counter-Client	Volume	Rate
3-Apr-07	1353310008	40643684	BUY	JSGCL	Nasreen Shaikh	JSGCL	Aftab Kari	500,000	22.75
7-Jun-07	1115580006	45371536	BUY	JSGCL	Amna Shaikh	JSGCL	Aftab Kari	500,000	36.65
10-Jul-07	1116570007	48024463	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	500,000	47.70
10-Jul-07	1117460028	48024838	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	500,000	47.70
9-Jul-07	1209470005	47928699	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	300,000	48.20
9-Jul-07	1136480030	47916915	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	200,000	48.50
9-Jul-07	1206560019	47927726	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	200,000	48.20
3-Apr-07	1353440017	40643724	BUY	JSGCL	Nasreen Shaikh	JSGCL	Aftab Kari	150,000	22.75
7-Jun-07	1116590025	45371859	BUY	JSGCL	Amna Shaikh	JSGCL	Aftab Kari	150,000	36.65
9-Jul-07	1113190045	47909359	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	100,000	48.90
9-Jul-07	1125280006	47913188	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	100,000	48.90
9-Jul-07	1130240019	47914749	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	100,000	48.80
10-Jul-07	1118320024	48025065	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	100,000	47.60
10-Jul-07	1126270062	48028343	BUY	JSGCL	Aalia Sheeraz	JSGCL	Aftab Kari	100,000	47.50

Following mentioned table reveals a classic case of wash trade, conducted by the Shaikh family within fraction of seconds and shows that M.Ibrahim was actually used as an intermediary to facilitate the wash sale.

DATE, I			fcPEg!	aapRicEn	^Voiume*^	
20070625	1113300040	M.Ibrahim	Buy	43.15	500,000	Begum Aftab Kari Sell
20070625	1113520027	M. Ibrahim	Buy	43.2	500,000	Begum Aftab Kari Sell
20070625	1114480023	M.Ibrahim	Sell	43.2	500,000	Amna Humayun Shaikh Buy
20070625	1115020007	M.Ibrahim	Sell	43.2	500,000	Amna Humayun Shaikh Buy

The following substantial cross trades conducted among the Shaikh Family Members during second review period:

PatBjfe	mm			
19-Mar-08	Nasreen Shaikh	3,800,000	2,100,000	Humayun Shaikh
			1,700,000	Ahmed Shaikh
25-Mar-08	Humayun Shaikh	2,055,000	3,310,500	Nasreen Shaikh
	Ahmed Shaikh	1,255,500		

AZIZ FI DA HUSSEIN FAMILY WASH TRADES:

Aziz Ftdahussein & Co played an important role in the scheme of manipulation in the scrip of ANL; the said brokerage house executed huge transactions in concert with other Group members through its proprietary as well as family members’ accounts.

In section 5.4.7 the family tree of Aziz Fidahussein has been explained according to which Ms.Zehra and Saba are the daughters-in-law of Aziz Fidahussein and their husbands Mr.Nazim Aziz and Irfan Aziz respectively are the directors in the said brokerage house. Since Aziz Fidahussein & Co has been 100% owned by Aziz family, trading between the said brokerage house and their daughters-in-law does not actually change the beneficial ownership. Therefore the following mentioned transactions carried out by them will be considered as Wash Trades:

Aziz Fidahussein & Co	2,852,000	Zehra Nazim Aziz	782,000
Aziz Fidahussein & Co		Saba Irfan Aziz	610,000
	Emm		

Following table reveals the blatant wash trades carried out by the few members of the Group, where the buyer and the seller is the same client.

OTHER GROUP MEMBERS WASH TRADES

WASH TRADES CARRIED OUT BY THE GROUP MEMBERS

Client	Date	Ticket#	Mem	TIME	Quantity	Rate	Amount	Counter-Mem
JS Bank	20-JUL-07	49125739	JS Global	1554310025	305,000	39.25	11,971,250	Aziz Fidahusseini
					305,000		U.971.25D	
Saba irfan	26-Dec-07	59752585	Aziz Fidahusseini	1342490011	37,500	51.00	1,912,500	Aziz Fidahusseini
					37.50D		1,912,500	
JS Growth Fund	14-Mar-08	65571935	Capital one Equity	1159270042	7,500	65.35	490,125	BMA
JS Growth Fund	14-Mar-08	65572010	Capital one Equity	1159340026	25,000	65.45	1,636,250	BMA
JS Growth Fund	14-Mar-08	65571928	Capital one Equity	1159270035	25,000	65.25	1,631,250	BMA
JS Growth Fund	14-Mar-08	65571933	Capital one Equity	1159270040	25,000	65.30	1,632,500	8MA
JS Growth Fund	14-Mar-08	65571991	Capital one Equity	1159340007	17,500	65.35	1,143,625	BMA
JS Growth Fund	14-Mar-08	65571996	Capital one Equity	1159340012	25,000	65.40	1,635,000	BMA
					125,00D		8,168,750	
Rashid Siddiqui	23-Jan-08	61655705	JS Global	1009260039	50,000	52.00	2,600,000	JS Global
					50,000		2,600,000	

5.5.5 Order Matching:

During the analysis of order data, it was revealed that the above mentioned Group members used to place buying and selling Order with a fractional difference of time. It is worth mentioning here that substantial order matching activity has been found during the trading session rather than in 'Pre-open' session. The scheme for creating artificial turn over and to move the share price up to the desired level can easily be seen through the order placement activity of all the Group members. The Annexure 5.5.5 reveals such activities, where the Group members can be identified placing their buying and selling orders with a difference of less than one minute and most of the time with same quantity and same rate for buying and selling the shares.

The following table reveals some substantial quantities of ANL shares, moved from one group member to another group member. This movement of shares shows the connection among the group members to facilitate each other in back drop of ANL price manipulation. The supporting CDC documents have been provided in **Annexure 5.5.6**.

i.6 Cross Movement of shares in CDC accounts of Group Members:

Date	Transfer From	Transfer To	No of Shares
08-05-2007	Nasreen Shaikh	Aftab Kari	1,575,000
08-05-2007	Nasreen Shaikh	Aftab Kari	425,000
02-06-2007	Nasreen Shaikh	Humayun Shaikh	4,763,466
1-08-2007	Nasreen Shaikh	Jehangir Siddiqui & Sons	7,200,000
28-08-2007	Nasreen Shaikh	Jehangir Siddiqui & Sons	1,200,000
17-09-2007	Jehangir Siddiqui Securities	Aziz Fidahussein & Co	2,800,000
01-11-2007	Jehangir Siddiqui S Sons	Nasreen Shaikh	8,400,000
10-01-2008	Jehangir Siddiqui Securities	Aziz Fidahussein & Co	1,500,000
22-01-2008	Aziz Fidahussein & Co	Jehangir Siddiqui Securities	1,500,000

Beside the above mentioned movement of shares among group members, other discrepancies have also been identified while reconciling individual group members trading transactions. Group members whose trading balances did not match with their CDC positions have been covered in later sections of the report under their individual heads.

5.6 What were Members (Brokerage Houses) Roles?

As mentioned earlier that following two members of Karachi Stock Exchange were found to facilitate the major trading of ANL Shares during both the review period:

5.6.1 JS GLOBAL CAPITAL (149):

During both the review periods, JS Global Capital has appeared as the top member both in terms of buying and selling of ANL shares. The said brokerage house provided a platform for majority of Group members to trade in aforementioned pattern. All the top buyers and sellers are clients of JS Global Capital and their cumulative trading constitutes 31% of total market turnover during the review period of April 02, 2007 to July 13, 2007, while 21.57% during second Review period Nov 29, 2007 to April 22,2008.

During both the review periods following errors were found in CDS system made by the said brokerage house in its clients' account:

15/05/2007	58,500	Shares purchased in Begum Aftab Kari Account while the delivery of shares made in Amna Shaikh account
13/06/2007	1,070,000	Mashooq Kaiyar released shares from CFS sale made from Mehboob Kaiyar account
18/03/2008	1,463,500	Actual sale made by M.Ijaz but the same transaction was also appearing in M.Riaz KATS trading detail, however only Mr.Ijaz CDS showed the delivery against the sale. This showed that a wrong entry of substantial quantity was made in Mr.Riaz account.

It has also been noted that following mentioned clients have cropped up as investors during the review period and has only traded in ANL or maximum in JSCL:

Begum Aftab Kari	ANL
Humayun Shaikh	ANL
Ahmed Shaikh	ANL
Aalia Sheeraz	ANL, JSCLEFU
M.Riaz	ANL, JSCL
M.Ijaz	ANL,JSCL
Rashid Siddiqui	ANLJSCL

Review Period 2

4-Dec-07	Jahangir Siddiqui & Sons Limited	4,042,500	147,875,308	14,171,000	29%				
11-Dec-07	Rubina Malkani	475,000	20,000,413	16,787,000	3%				
2-Jan-08	Saad Saeed Faruqi	7,817,500	344,472,515	16,627,500	47%				
7-Feb-08	Rashid Siddiqui	1,629,500	85,464,576	13,589,500	12%				
3-Mar-08	Shazia	3,173,500	185,168,744	17,618,000	18%				
31-Mar-08	JS Investments Limited					2,984,500	197,284,611	17,143,000	17%
31-Mar-08	Zaibunisa	2,200,000	147,872,840	17,143,000	13%				
15-Apr-08	Muhammad Riaz	4,196,500	318,054,288	12,614,500	33%				
15-Apr-08	Muhammad Ijaz	1,972,000	145,424,644	12,614,500	16%				

The quarterly statement of JS1L for the period March 31. 2008. shows an investment of Rs.197 million in ANL. which constitutes 63% of total investment of JSIL in unrelated parties.

5.6.2 AZIZ FIDAHUSSEIN & Co LIMITED (087):

Aziz Fidahussein & Co Limited was found as another key player of the price manipulation scheme, who played an important role to facilitate JS Global Capital for doing cross trading among various clients of the Group. Besides doing its proprietary trading in the second surge, the said brokerage house used two of its clients' accounts, which were in family connection with the CEO and other directors of the brokerage house. Ms Zehra Nazim Aziz and Saba Irfan Aziz both are daughters-in-law of Aziz Fidahussein and wives of two of the Directors of AFH.

The AFH own trading and two of its clients namely Zehra and Saba cross trading with other Group members and the financial links between the two ladies and the brokerage house also reveals the nexus among all the Fidahussein family members. The details have been discussed later in the individual clients section of the report.

Further, it was also found that the copies of payments received from and paid to the client were not maintained by the relevant brokerage house, while clause 9 of Account Opening Form (KSE General Regulations) has made it mandatory for all the brokerage houses to pay any amount of Rs.25,000 and over, through a cross cheque/bank draft or pay order and retention of copy of instrument for minimum periods of Five years.

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5.6.3 LIVE SECURITIES:

Live Securities is an Associate company of Khanani and Kalia Group, which is mainly involved in Foreign/Money exchange business. During the second review period, Live Securities client Mr.Asif Mendha appeared as the Top Buyer with 27 million shares worth Rs.1.6 billion and the Top Seller with 23 million shares worth Rs.1.3 billion of ANL respectively.

During the investigation, it was revealed that Mr.Mendha's account was personally handled by Mr.Jtehrat Dossani, CEO Live Securities and even the Head of Operation and Head of Settlement had no idea about the transactions taken place under the account head of Asif Mendha. All the explanation and details were personally provided by Mr.Dossani.

TRADING ACCOUNT INFORMATION:

While investigating the trading details of Asif Mendha through Live Securities, it was noted that two Financial Ledgers were maintained by the brokerage house for Asif Mendha. Initially only one ledger (014026) was provided to the Commission. However on further enquiry that 'why substantial payments were being made to Asif Mendha despite huge debit balances appearing in his account', the brokerage house provided second ledger (001294) to the Commission, showing credit balances. This account was subsequently closed on 08 February 2008, transferring all the credit either to other Financial Ledger (014026) and thereafter substantial payments were made to other individuals on behalf of Mr.Asif Mendha.

Analyzing the two Financial Ledgers provided by the brokerage house, we made the following observations:

- o Financial Ledger (001294), revealing credit balances not justified with the transactions mentioned by the brokerage house. The quantity and rates for various scrips to calculate the credit in Asif Mendha account were not matched with transactions carried out by Asif Mendha on KATS.
- o Transferring total credit of 21 million from account 001294 to 014026 not justified the Commission query regarding the substantial payments made to Asif Mendha despite of huge debit balances appearing in his account.
- o Maintaining two financial ledgers simultaneously, merely on client request does not provide any proper justification.
- o The copies of substantial payments made to Asif Mendha were not retained by the brokerage house; however the same were provided later arranging from the relevant banks on Commission advice.

As a reply of all the abovementioned queries, Mr.Ashraf Dossani informed us that the account no 01294 was being used as part of over all risk management plan. The client had surplus credit balance [Source of this credit balance has not been provided by the Brokerage House] in his account no 01294, which he had desired to mobilize through Live Securities for earning some income thereon. Accordingly whenever funding opportunity was available in the market, Mr.Mendha instructed the brokerage house to advance the money to the counter parties to earn some profit. However when the funds remain idle the brokerage house as an incentive to him to keep the funds with House, had agreed to mobilize his funds as per his desire. For the purpose of timely reconciliation and verification and to avoid complex calculations, a separate trading account No. 14026 was maintained.

The abovementioned reply did not justify the queries raised by the Commission on the following mentioned grounds:

- Account No 01294 was closed on Feb 02, 2008 and total credit of Rs.20 million was transferred to other account i.e 14026. The credit transfer was *not* sufficient to *carry* out the substantial transactions by Asif Mendha therefore the debit balance started appearing in his account and again despite huge debit balance the Brokerage House kept issuing substantial payment to the client.
- Mr.Mendha trading in ANL shares was completely carried out using CFS facility and he did not put any amount of equity to carry out billion of rupees transactions despite of credit available in his another account as mentioned by the Live Securities. Keeping this point in mind there was no logical reason for the client to pay premium on the borrowed funds while he himself had enough credit in his account.
- Not a single share activity has been identified in Asif Mendha CFS account as Financier to justify the claim if Live Securities to use his credit amount for the financing in the market.

PAYMENTS ISSUED TO ASIF MENDHA:

Extending the investigations to probe the substantial payments issued to Asif Mendha despite of huge debit balances, it was noted that these payments were not only issued in the name of Asif Mendha but also issued to other individuals on behalf of Asif Mendha.

During the verification of payment record of Mr.Asif Mendha, the following payments were issued to other individuals on behalf of Mr.Asif Mendha, which were subsequently identified as associates/employees of Live Securities.

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16/01/2008	1034741	BankAlfalah	Live Securities	Abdul-Rasheed	5,124,000
11/02/2008	1036004	Bank Alfalah	Live Securities	Mr. Amir	13,832,000
21/02/2008	1035574	BankAlfalah	Live Securities	Mr.Sameer	8,560,940
28/02/2008	1141760	Bank Alfalah	Live Securities	MrArif Razzak	5,502,900
28/02/2008	1141761	BankAlfalah	Live Secu rities	Mr.Sameer	5,500,000
28/02/2008	1141762	Bank Alfalah	Live Securities	Mr.Sameer	4,500,000
28/02/2008	1141763	BankAlfalah	Live Securities	Mr.Sameer	5,000,000

SAMEER AHMED WARSI:

Rs.23.5 million payments were made to Mr.Sameer on behalf of Mr.Asif Mendha by Live Securities. The bank account opening form and CNIC of Sameer shows that he is 20 years old and involved in shares business. The contact number (021-2631013) mentioned on his bank account opening form reveals the address 'Khanani and Kalia .Office No 119, First Floor, Saima Trade Tower, I.I Chundrigar Road'.

It is also important to mention here that Sameer has account in UBL Al-Rehman Branch, where Khanani and Kalia (KKI) and Mr.Qasim's accounts (an alleged employee of Live Securities, whose information has been mentioned in the following section) are also opened,

AMIR ZAKARIA:

Another huge payment of Rs. 13.83 million was made by Live Securities to Mr Amir on behalf of Asif Mendha. The bank account opening form and CNIC of Amir shows that he is 29 years old and also involved in shares business. The contact number (021-2440443) mentioned on his bank account opening form reveals the address 'Room No 50-51,Old Stock Exchange Building, I.I Chundrigar Road', which was subsequently confirmed as 'LIVE SECURITIES OFFICE'.

ABDUL-RASHEED AND ARIF -ABDUL RAZZAK:

Abdul Rasheed and Arif Abdul Razzak both have their bank accounts in NIB Bank in their Bolton Market and DHA Phase II branches respectively. Total payment of Rs. 10,626,900 was paid to these individuals by Live Securities on behalf of Mr.Asif Mendha.

The bank account opening form of MR. Abdul Rasheed showed him as a broker in bond market .The account was opened in November 2007 and closed in March 2008 (the duration of account opening matched almost the same period of second review period). It is also pertinent to mention here that during this period MrAbdui Rasheed have authorized M.Rafiq, Abdul Qadir and Noor uddin as authorized people to operate his account

Further the contact number (021-2433177) provided on the bank account opening form shows the address as '56 Booth, Room No 50-51, Old Stock Exchange Building, I.I Chundrigar Road',. This is the same address which is confirmed as Live Securities office in the above mentioned case of Amir Zakaria. The contact number of Mr. Jawed who is an introducer of Abdul Rasheed bank account also provides the same address.

MrArif Abdul Razzak bank account opening form reveals that his account was opened in January 2008. Further the occupation of Mr.Arif has been mentioned as Self Employed and name of employer shows 'Advance Telecom'. While The contact number (021-2634162) mentioned on account opening form provides the same address 'Khanani and Kalia, Office No 119, First Floor, Saima Trade Tower, I.I Chundrigar Road' as mentioned in the above mentioned case of Mr.Sameer.

CASH PAYMENTS:

Following are the cash payments issued by Asif Mendha to other individuals and the further scrutiny of these payments revealed that these payments were also received by the officials of Live Securities or its parent company i.e Khanani and Kalia.

Sl e	Issuer	Beneficiary	Date	Instrument	Amount	Recd Received
1	Asif Mendha	Cash Cheque	9-Apr-08	7294877	1,000,000	Nasir Shah
2	Asif Mendha	Cash Cheque	21-May-08	7294892	4,591,892	Mohd Nawaz
3	Asif Mendha	Cash Cheque	29-May-08	7294897	2,000,000	Mohd Rafiq
4	Asif Mendha	Mr.Qasim	29-May-08	7294900	3,000,000	Cross Cheque

Cheque mentioned on S.No 1 en-cashed by Nasir Shah a resident of Orangi Town, Karachi. The back of Cheque shows a reference of 'Live Security Money Exchange'

Cheque mentioned in S.No 2 en-cashed by Mr.Mohd Nawaz, a resident of Nishter road, Karachi. The back of Cheque shows a reference of 'Kalia. Stock Exchange'.

The Cheque on S.No 3 has en-cashed by Mr.Mohd Rafiq a resident of Mohammadi Colony, Kemari, Karachi. The back of Cheque shows a reference of 'Ashraf Dossani (Kalia Saima Tower 11th FloorV.

Similarly Cheque mentioned on S.No 4 also shows a reference of Mr Ashraf Dossani name. CEO of Live Securities. The bank account opening form of Mr.Qasim reveals the same address 'Khanani and Kalia, Office No 119, Rrst Floor, Saima Trade Tower, I.I Chundrigar Road' and contact number as mentioned in above mentioned Sameer Warsl's information.

In continuation of the above following is the payment which was issued by Asif Mendha to Mr.Abdul Rauf having his bank account in Habib Metropolitan Bank. His Bank account opening form revealed his profession as 'Cement Dealer":

Asif Mendha	Abdul-Rauf	20-05-200B	7294893	1,020,737

On further probing it was revealed that the same payment was transferred to Live Securities account on very next day. Details are as following:

Abdul-Rauf	Live Securities	21-05-2008	25269261	1,020,737

ADDITIONAL LINK:

During the investigation, we also discovered that Asif Mendha was not merely operating as client of Live Securities but also had some business links with its parent company Khanani & Kalia. Following are the payments transferred by Asif Mendha to Khanani & Kalia, which have been traced from the other account of Asif Mendha with JS Bank:

Asif Mendha	Cash received at UBL Al-Rehman Branch	03-06-08	387119	9,325,000
Asif Mendha	Khanani & Kalia	18-06-08	387124	6,000,000
Asif Mendha	Khanani & Kalia	18-06-08	387125	6,000,000

EXCAHNGE OF FUNDS WITH LIVE SECURITIES CEO ASHRAF DOSSANI:

During the investigation the Commission found following mentioned one to one financial transactions between Ashraf Dossani, having his joint bank account with his wife in Bank Alfalah and Asif Mendha.

ISSUER	BENEFICIARY	DATE	INSTRUMENT#	AMOUNT
Asif Mendha	Ashraf Dossani	24.01.2008	6562135	3,375,000
Ashraf Dossani	Asif Mendha	13.03.2008	1241930	7,64D,000
Asif Mendha	Ashraf Dossani	09.05.2008	387109	1,538,000
Ashraf Dossani	Asif Mendha	27.05.2008	1241933	8,500,000

PAYMENTS TRANSFERRED TO IRFAN AMANULLAH/Attock Cement Officials:

In addition to funds transferred to Live Securities and its associates, Asif Mendha also passed substantial 17.6 million to different officials of Attock Cement mainly Irfan Amanullah, company secretary of Attock Cement.

The link between Asif Mendha and Irfan Amanullah established through the bank account opening form of Asif Mendha with MCB. *The 'Authority to contact' or 'Next to Kin' section of the account opening form revealed the name of Mr/Irfan Amanullah C/O Attock Cement*

The following note, written by the bank official has also been found or account opening form:
'Account Is being introduced by the official of M/S Attack Cement and they have a/so informed us that Mr. Muhammad Asif Mendha will keep substantial baiance In his account "

Following table reveals the detail of these payments

Issue	Beneficiary	Position	Date	Account No	Amount
Asif Mendha	Babar Bashir	CEO	01.12.07	5395189	1,000,000
Asif Mendha	Irfan Amanullah	Company Secretary	23-10.07	5395186	*2,156,000
Asif Mendha	Irfan Amanullah	Company Secretary	07-01-08	6562126	*1,600,000
Asif Mendha	Irfan Amanullah	Company Secretary	21-04-08	729488B	6,500,000
Asif Mendha	Moinuddin Nasim	internal-Audit Official	29-05-08	1052826/3 2922508	4,175,000
Asif Mendha	Sheikh Tariq Jamil	I.T Manager Attock	03-05-08	0387105	*1,200,000
Asif Mendha	Sheikh Tariq Jamil	Cement	09-05-08	0387111	*1,000,000
					17,631,000

Transferred through JS Bank

In addition to the above, the following two payments were issued to First Capital Equities (Brokerage House) by Asif Mendha:

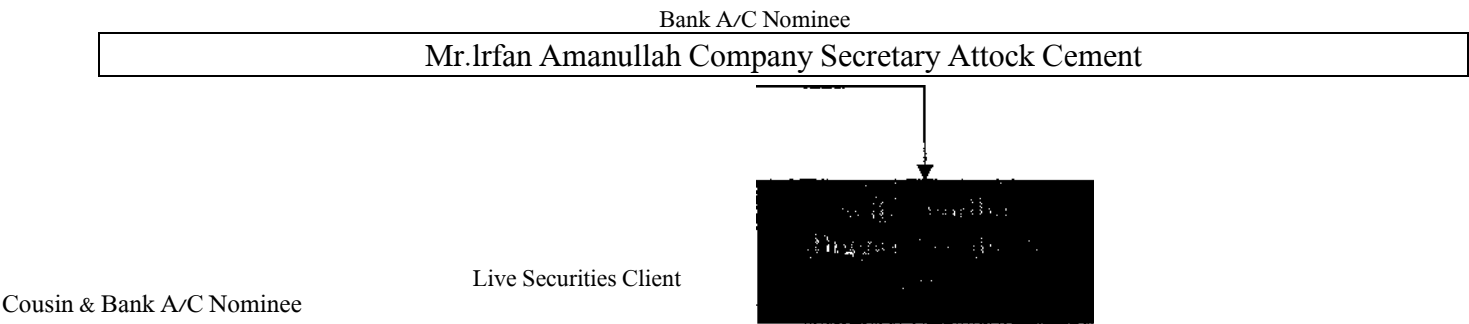
Mr.Asif Mendha	First Capital Equity	19.05.2008	f&l VII Tfa'dt' jV 7294889	1,154,958
Mr.Asif Mendha	First Capital Equity	22.05.2008	7294894	1,790,329

On enquiry from FCEL It was revealed that these two payments have been paid on behalf of Ms.Shafaq Irfan, who is the wife of Mr.Irfan Amanullah as mentioned in her account opening form with FCEL. Mr.Irfan is also a nominee in his wife trading account.

CARTEL OF ASIF MENDHA. ASHRAF DOSSANI & IRFAN AMANULLAH:

The bank account opening form of Ashraf Dossani revealed his relationship with Irfan Amanullah, an official of Attock Cement. The bank account opening form of Ashraf Dossani has revealed Irfan Amanullah and Dossani as Cousins.

It is pertinent to mention here that in earlier section of the report Mr.Irfan Amanullah has been mentioned as beneficial owner of Mr.Mendha bank account, similarly his name has mentioned in Mr.Ashraf Dossani bank account as nominee or Next to Kin.



Ashraf Dossani CEO Live Securities

it is also interesting to mention here that Mr.Ashraf has mentioned himself as un-employed person but has given the contacts number of Live Securities on his bank account opening form.

The following table shows the one instance of funds movement among Asif Mendha, Ashraf Dossani and other related people such as M.Yousuf brother of Ashraf Dossani, Qasim (an alleged employee of Live Securities) and Moinuddin Nasir (Irfan Amanullah Colleague in Attock Cement):

ISSUER	BENEFICIARY	DATE :	INSTRUMENT #	AMOUNT
Asif Mendha (JS Bank)	M.Yousuf (Brother of Ashraf Dossani)	24.05.08	387114	8,500,000
M .Yousuf (MCB)	Ashraf Dossani (BAFL)	26.05.08	510328	3,500,000
			510329	5,000,000
Ashraf Dossani (BAFL)	Asif Mendha (MCB)	27.05.08	1241933	8,500,000
Asif Mendha (MCB)	Qasim (An alleged employee of Live Securities)	29.05.08	7294900	3,000,000
	Cash received by Live Securities Staff	29.05.08	7294879	2,000,000
	Moinuddin Nasir (Irfan Amanullah Colleague in Attock Cement)	29.D5.08	1052826	4,175,000

The supporting documents of these transactions have been provided in [Annexure 5.6.3.](#)

All the above mentioned information led the investigator to conclude that Ashraf Dossani CEO of Live Securities in connivance with his cousin Irfan Amanullah used the account of Asif Mendha to artifice a scheme of manipulation in the scrip of ANL. The dubious information of Asif Mendha trading account showing a severe non-compliance of established rules of Risk Management.

Moreover, keeping in view the aforementioned Cheques which have been issued to other individuals who prima facie are the employees and associates of Live Securities, we may also conclude that the Live Securities was itself involved in the trading of ANL shares in connivance with its CEO Ashraf Dossani.

5.6.4 CONNECTION AMONG THE THREE BROKERAGE HOUSES:

The earlier sections of the report have entailed the various facts & figures to reveal the manipulation scheme, carried out in the scrip of ANL The clients involved in the said scheme mainly belong to JS Global capital, Aziz Fidahussein & Co and Live Securities, all are the members of Karachi Stock Exchange.

The substantial cross volume showed that all three brokerage houses along with their clients were trading in concert. These cross volumes among the clients were not possible without the help of their respective brokerage houses. Details have been covered in earlier section 5.5.5 of Order Matching to show how these clients matched each other trades in an un-disclosed market. The following section will show the statistics of their matched/cross trades along with the other facts revealing the links among the three brokerage houses.

JS Global Capital & Aziz Fidahussein & Co:

Both the brokerage houses have been involved in both surges of ANL. Initially in the first review period only two clients namely Zehra Nazim Aziz and M.Iqbal were involved from Aziz Fidahussein side. Zehra Nazim Aziz is the family member of Aziz Fidahussein while M. Iqbal is the front man of Dagia family, an associate of JS Group.

The following table reveals the huge percentages of both these clients cross trades, where the substantial quantities of both the clients trading are crossed with other JS Global clients. The detail of cross trading has been given under the individual head of each client.

CROSS TRADES BETWEEN AFH & JS GLOBAL						
During the First Review Period						
AFH Clients	Total Buy during the review period	Cross Sale with JS Global Clients	Cross trade% w.r.t Total Buy	Total Sell during the review period	Cross Buy with JS Global Clients	Cross trade% w.r.t Total Sell
M.Iqbal	6,133,000	5,327,000	86.86%	1,115,500	1,030,000	92.34%
Zehra	18,488,000	12,131,000	65.62%	19,235,500	11,467,000	59.61%
Total	24,621,000	17,458,000	70.91%	20,351,000	12,497,000	61.41%

Following are the few instances which show how cross trades, carried out between Zehra and JS Global clients ^ used to maneuver the trading volume in the scrip of ANL.

Instance # 1

On June 13, 2007, Jahangir Siddiqui Securities Services sold 1,075,000 shares of ANL, out of that ZNA bought 1 million (98%) shares from JSSSL and at the same time she sold 822,000 (78%) shares to Jahangir Siddiqui & Sons Limited.

"V^u[TX"				
ZNA	20070613	BUY		Jahangir Siddiqui Securities Services Limited
ZNA	20070613	SALE		Jahangir Siddiqui & Sons (Private) Limited

Instance# 2

On May 18, 2007 ZNA bought 2 million shares from Saad Farooqui a member of Group and sold the same quantity to Jahangir Siddiqui & Co on the next working day of May 21, 2007. Following is the detail of the transactions;

BUYER	DATE	TYPE	PRICE	VOLUME	COUNTER PARTY
ZNA	20070518	BUY	39.00	2,000,000	Saad Farooqui
ZNA	20070521	SELL	39.50	2,000,000	JS Company Limited

During the second review period Aziz Fidahussein & Co not only did proprietary trading but also used the trading account of another family member, Saba Irfan Aziz. However M.Iqbai involved in first surge did not appear in the second surge. The following table covers the detail of cross trades among the AFH and JS Global clients during the second review period:

	-t: .CROSS TRADES BE HWEEEN AFH IIS GLOBAL & During the Second Review J period:						' " t '
AFH Clients	Total Buy during the review period	Cross the with JS Clients	Sale JS Global		Total Sell during the review period	Cross Buy with JS Global Clients	
Aziz Fidahussein & Co	2,852,000	1,570,500			3,718,000	2,179,000	wiii
Zehra Nazim Aziz	11,301,500	6,303,500			11,378,500	4,669,000	
Saba Irfan Aziz	10,877,000	2,958,500	/; #30.17%p:		11,968,500	2,677,000	
.Total '	25,030.500	10,832,500 >:	?il43.28%If		*27,065^000	9,525,000 ;}	H\$"35ll9%/S'.>'

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V/

CPC CROSS MOVEMENTS:

The following instances showed the CDC movement of ANL shares among the Aziz Fidahussein & Co and JS Giobal client JS Securities. These transactions have not occurred as result of any trading in the scrip rather these are simply landing borrowing of shares among the related parties.

17-09-2DD7	Aziz Fidahussein & Co Participant A/C # 03053 (Proprietary Book)	Jahangir Siddiqui Securities Sub A/C # 3413 with JSGCL	2,8D0,DDD	17-09-2D07
10-01-2008	Jahangir Siddiqui Securities Sub A/C # 3413 with JSGCL	Aziz Fidahussein & Co Participant A/C # 03053 (Proprietary Book)	1,500,ODD	22-pl-2008

Wash Trade

JSBL was found doing a wash trade on July 20, 2007 selling 3D5.000 shares from its client code (2490) with JS Global Capital to HJSB another JSBL client code maintaining with Aziz Fidahussein & Company. Following are the details of the transactions:

fHfi	C9I			M BS	H HI	pS		
20-Jul-07	49125739	2490	1554310025	SELL	305,000	39.25	11,971,250	HJSB

FINANCIAL LINKS:

Following are the few financial links have been discovered during the investigation of ANL scrip showing the strong link among the officials of two brokerage houses.

Ouringthe first review period, a payment of Rs3.8 million in form of cash was deposited by MJqbal (Front of Oagia family) in Aziz Fidahussein & Co account and this payment released from Ms. Nail a Umer account (member of Oagia family) as Cash Cheque.

The cash amount was received by Sadia Patni husband of JS Global client Shazia Sadiq and also the employee of JSCL. He has been identified as front man of Munaf Ibrahim CEO of JSCL in the late sections of the report.

Similarly another payment bank transfer of Rs.5.4 million was made from Shazia Sadiq & M.Sadiq Bank Account, to Aziz Fidahussein & Co (Brokerage House) on account of Mubina Amanullah (Alleged sister of Mr. Munaf Ibrahim). The payment transfer form was signed by Mr, Sadiq Patni, husband and joint account holder of Ms. Shazia Sadiq.

During the investigation of AFH’s client Zehra Nazim Aziz bank account, we found the two instances where the payments were made from Zehra’s bank account on behalf of.MrsAmina (mother of Munaf Ibrahim, CEO of JSCL) and Munawar Alam Siddiqui, brother of Mr Jehangir Siddiqui.

The following table reveals the detail of such payments including two Cheques issued to Mrs.Amina which were subsequently used to issue pay orders to Aziz Fidahusseini & Co for trading purpose in Mrs.Amina account.

Date	Amount		Beneficiary	-Ultimate Beneficiary
20.04.2007	5,000,000	Zehra Nazim Aziz	Mrs.Amina	Aziz Fidahusseini & Co
20.04.2007	4,260,000	Zehra Nazim Aziz	Mrs Amina	Aziz Fidahusseini & Co

The following instance showed the movement of funds among AFH, Zehra and Munawar Alam Siddiqui.

F-					
16.08.07	10,000,000	Aziz Fidahusseini & Co	Zehra/Razia Aziz	i	
17.08.07		Zehra/Razia Aziz	Munawar Alam Siddiqui		10,000,000
20.08.07		Munawar Alam Siddiqui	Zehra/Razia Aziz		10,000,000
22.08.07		Zehra/Razia Aziz		Aziz Fidahusseini & Co	10,000,000

CONNECTION WITH LIVE SECURITIES:

As it has mentioned earlier that Live Securities only appeared in the second review period and only one client Asif Mendha of the brokerage house traded the largest quantities in the second review period. The following tables reveal the substantial cross trades of Asif Mendha with other clients of two brokerage houses. These cross trades supported to manipulate the price of ANL in the second review period.

WCRQSSfTRA DE		;MBE^g^0073C^At>R[L'g^	IS .&■ vis*0'
Asif Mendha	27,353,500	Saad Saeed Farooqui	3,676,000
Asif Mendha		Rashid Siddiqui	3,663,000
Asif Mendha		Shazia	2,225,500
Asif Mendha		Crosby Dragon Fund	1,100,000
Asif Mendha		Saba	323,000
Asif Mendha		JS investments Limited	259,000
Asif Mendha		Aziz Fidahussein	93,000
Asif Mendha		JS Bank Limited	76,000
Asif Mendha		Rubina Malkani	44,000
	immzsk	^^K^4M89%CrossiTrfefes?	gffifiOMIM f

tea		EMBER29^2no7--rn APRiHnaajta	
Asif Mendha	23,525,000	Crosby Dragon Fund	2,623,000
Asif Mendha		Shazia	1,690,000
Asif Mendha		Rashid Siddiqui	1,555,000
Asif Mendha		Saad Saeed Farooqui	1,182,000
Asif Mendha		Saba	392,500
Asif Mendha		JS Growth Fund	368,000
Asif Mendha		Rubina Malkani	200,000
Asif Mendha		Aziz Fidahussein & Co	164,500
Asif Mendha		Zaibunnisa	156,500
Asif Mendha		M.Riaz	149,500
Asif Mendha		M.Ijaz	81,000
Asif Mendha		JS Investment Ltd	69,000
Asif Mendha		JS Income	50,000
Asif Mendha		JS Securities	13,000
Asif Mendha		JS Protected Fund II	10,000
			::<^8JQ4,000, ritfcGroupmember a

The following table reveals the instances where Asif Mendha along with other JS Global clients constituted the major volume of a particular day and also ramped up the price of the scrip.

								GROUP MEMBERS					
Date	Open	High	Low	Close	Turn over	Price Change	% Change	Group Mem	Mem Buy	% w.r.t Mkt	Min OP	Max QP	Rank
09-1-08	49.5	51.95	49	51.95	12,888.500	2.45	4.95%	JS Securities	5,681,000	44.08%	51.0	52.0	0.9
								Asif Mendha	912,000	7.08%	50.3	51.5	1.2
29-2-08	54.1	56.8	55.1	56.8	7,855,500	2.7	4.99%	Shazia Sadiq	1,942,000(T	24.72%	55.1	56.8	1.7
								Asif Mendha	1,000,000	12.73%	55.7	56.8	1.1
3 3 08	56.8	59.6	57.5	59.6	10,145,000	2.8	4.93%	Shazia Sadiq	1,759,000	17.34%	57.5	59.6	2.1
								Asif Mendha	1,652,000	16.28%	58.7	59.6	0.9

Though no financial link was found between the two brokerage houses and Live securities, however one of Asif Mendha bank account has been found with JS Bank (one of the accused in the manipulation scheme). Following are the details of this bank account:

Bank Name:

JS Bank DHA 8branch

A/C number:

200009737

Opening Date:

13-02-200B

Introduced By:

Not mentioned Joint /VC

Holder:

Nil

Nominee/Next to Kin:

Rizwana Abdul Sattar (wife)

5.7 FINANCIAL LINKS:

In continuation aforementioned trading information of the Group members, following financial links were also discovered during the verification of some clients' bank information. The following section has covered only the basic information of any particular client bank account; the details of payment issued to/from clients have been covered in later sections of the report under individual heads of each client.

The Account opening forms of all the following mentioned clients have been provided in [Annexure 5.7](#):

Under the head of Financial Links it is important to mention here that JS BANK, one of the accused, has been used as strong Group ally to hide some crucial financial matters of Group members. Following Group members have their accounts in JS Bank; details pertaining to these Group members have been covered under their individual heads:

- Saba Irfan Aziz ■
Zaibunnisa
- Asif Mendha
- Mehboob Kaiyar
- Aziz Fidahussein & Co Ltd

SHAIKH FAMILY BANK ACCOUNTS

Bank Name: ■...■ 2.i'' ■''JF	s. MCB, Premier Branch Lahore	NIB Gulberg Branch Lahore	MCB, Premier Branch Lahore	NIB Gulberg Branch Lahore	MgBflrMaFiLiai MCB, Premier Branch Lahore
tyC numbec.	20151288	498110	10117521	497310	6270-1
Opening'''^	13-05-2005	17-03-2006	11-07-2005	17-03-2006	16-05-2006
Introduced , By:	Naimatullah	Jawaid Raza C/O Azgard Nine	Amna Humayun Shaikh (Daughter)	Jawaid Raza C/O Azgard Nine	Naimatullah
Joint A/C^' Hoider	Nil	Nil	Nil	Nil	Nil
Nominee/N ext	Nasreen Shaikh	Nasreen Shaikh	Humayun Shaikh	Humayun Shaikh	Humayun Shaikh

The above mentioned table reveals that all the family members are also financially linked with each other. Follwing are the information we have gathered from their bank account opening forms:

-
- 2 All Cheques issued from Begum Aftab Kari account were signed by Humayun Shaikh. Authority has been given from BAK to Humayun Shaikh and Nasreen Shaikh.

MI2 is a resident of 430 Township Lahore, while his CNIC shows his permanent address as Bhera Municipal Committee, Tehsil Bhalwal, District Sargodha. The account opening form reveals that MI2 is a salaried employee of Azgard Nine Limited having an education up to Metric.

During the verification of said client's bank account, we made the following observations:

- Account has been opened on 30-07-2007 and purpose of account opening has been mentioned salary transfers and Shares investment with an expected turnover of 8-10 million.
- An authority letter has been provided by MCB in which Mr.Ijaz has authorized Mr.Humayun Shaikh, Ahmed Shaikh and Aehsun Shaikh to operate his account.
- Scrutinizing the deposits and withdrawals appearing in his bank account statement, it was revealed that MI2 account was used by Shaikh family to manipulate the scrip of ANL, in connivance with JS Global Capital .The details of funds movement has been provided under the individual head of M.Ijaz

The above mentioned points proved that the account of Mr.Ijaz has actually been used by thfe sponsors of Azgard Nine Limited.

MUHAMMAD RIAZ (MR):

Bank Name: NIB (former PICIC Commercial Bank), Gulberg Branch Lahore
A/C number: 040201-36700-0010
Opening Date: 31-10-2007
Introduced By: Naimatullah (Also introduced M.Ijaz and BAK account)
Joint A/C Holder: Nil
Nominee/Next to Kin: Muhammad Nawaz

MR is a resident of Gulberg III, Lahore, while his CNIC shows his permanent address as Jabalpur Saidaan, District Khushab. The account opening form reveals that Mr.M.Riaz account has been opened On 31.10.2007 C/O Azgard Nine Limited and showed his monthly income/salary Rs.15000.

Similar to M.Ijaz account, MR Bank account was also used by Shaikh family to manipulate the scrip of ANL, in connivance with JS Global Capital .The details of funds movement has been provided under the individual head of M.Riaz

SHAZIA SADIQ (S.S):

Bank Name: Muslim Commercial Bank-Stock Exchange Branch
VC number: 1063-02-01-0052512
Opening Date: 04-09-2001
Introduced By: Tariq Usman Bhatti (Ex-Director JSCL)
Joint VC Holder Sadiq Patni Nominee/Next to Kin: Muhammad Hanif

The above information shows that S.S has joint account with her husband Sadiq Patni, residents of Patni Society, Baldia Town, Karachi. The account opening form reveals that Mr.Sadiq Patni is an employee (apparently an Office Assistant) of Jahangir Siddiqui & Co Ltd, getting Rs. 15,699 per month while SS as a house hold lady.

It is also mentioned there that the account was introduced by Mr.Tariq Usman Bhatti an ex-Director of JS Group. It is very strange that a Director of JSCL should take an extra ordinary interest in opening a low level employee account with MCB.

During the verification of said client's bank statement, we made following observations:

- Millions of rupees transactions were carried out which are not in conformity with Mr.Patni employment status.
- Payments of Rs. 8 million and 10 million have been made to Mr.Munaf Ibrahim, the CEO of Jahangir Siddiqui & Co.
- A pay order of Rs.5.4 million was issued from S.S account to Ms.Mubina Amanullah (sister of Munaf Ibrahim) with a beneficiary name of Aziz Fidahusseini & Co.
- Another cash cheque withdrawn by M.Sadiq, amounting Rs. 17.8 million dated 05-11-2007 was partially deposited (Rs.12 million) in Munaf Ibrahim Account
- A payment of Rs. 3,435,000 withdrawn in form of cash on 24.07.2007 was deposited in Syed Nizam Shah Account, a Director of Jahangir Siddiqui and Company.
- During the review period 'Cash Cheques' of substantial amounts have been issued. All the payments have been issued by the signatures of Mr.Sadiq Patni and most of the cash cheques also received by

The abovementioned points provide a strong possibility that the SS bank and trading accounts have been misused by JSCL officials especially by CEO Mr.Munaf Ibrahim through her husband Mr.Sadiq Patni, who is an employee of JSCL.

MEHBOOB ALI KALYAR (MAKk

During the investigation it was revealed that MAK maintains his bank accounts with different banks such as MyBank, MCB, JS Bank,, Faisal Bank and Habib Bank. Following are the details of MyBank where major transactions pertaining to his trading details have taken place:

Bank Name:	My Bank-Stock Exchange Branch
A/C number:	01-010-127-7
Opening	06-05-2006
Date:	<u>M.labal Rangila (Apparently an employee of JS Bank)</u>
introduced	Nil
By:	Arshat Mehboob Kalyar (Wife)
Joint A/C Holder:	
Nominee/Next to Kin:	MAK has an account in MyBank, Stock Exchange branch and a resident of KDA Scheme, Gulshan_e_Umair, Karachi. The account opening form reveals that Mr.Mehboob Ali Kalyar is also an employee of Jahangir Siddiqui & Co Ltd and has been working as personal assistant of Chairman, namely Jahangir Siddiqui.

In his account also millions of Rupees payments were observed, details have been covered under the individual head of the client. However following two points are worth mentioning here:

- The Kaiyar has "Running Facility" of Rs.8.9 million against the shares of AABS, ANL, EFUL, JSCL and JSGCL, all pertaining to JS Group companies.
- Three major Payment transfers of Rs. 3,685,484 have been found from Ali Jahangir Siddiqui's (Director in JSCL and ANL) bank account to his account.

MUHAMMAD IQBAL (MK»:

M!Q is a client of Aziz Fidahussein and resident of sector III-F, Nazimabad, Karachi. It is important to note that M.Iqbai bank account information is not available consequently to carry out huge transactions in ANL shares, he made following two payments during the first review period, using Ms. Naila Bank Account.

'mmM: ;■			
Muhammad Iqbal	Aziz Fidahussein	10/08/2007	50,000,000
Muhammad Iqbal	Aziz Fidahussein	13/08/2007	3,807,430

On verification of the supporting instruments of these payments, following information of MS. Naila bank account was gathered:

Bank Name:My Bank-Stock Exchange Branch

A/C number:01-100-037-7

Opening05-09-2006

Oate:Muhammad Bilal

IntroducedUmer Mashoo

By:Zubaida Dagia (Mother-in-Law of Ms. Naila)

Joint A/C Holder:

Nominee/Next to Kin:Scrutinizing the bank account opening form and the bank statement of Ms.Naila, following observations were made, details of which have been provided under the individual head of Mr.M.Iqbal.

- It was revealed that both of these payments have been made from a joint account of Ms.Naila, who is wife of Mr., Junaid Dagia s/o Abdul Hameed Dagia and Mr. Umer s/o Mashoo, which apparently have no personal or business link with each other.
- Further Mrs. Zubaida Dagia (ZD) is the nominee of Ms. Naila and Umer bank account, ZD relationship with Ms. Naila has been written as 'Mother-in-Law' in the bank account opening form.
- Husband of Ms. Naila, MrJunaid Oagia s/o Abdul Hameed Dagia is CEO and a Director in Technology Trade (Pvt) Limited, a share registrar company of all the JS Group companies. Please note that Mr.Mubashir Oagia, another son of Abdul Hameed Dagia is allowed to operate M.Iqbai brokerage account with Aziz Fidahussein.

A payment of Rs3.8 million in form of cash was deposited by M.Iqbal in Aziz Fidahussein account and this payment was also released from Ms.Naila Umer account as Cash cheque and the amount was received by Mr.Sadig Patni. front man of Munaf Ibrahim. This is ample proof that all the parties are hand in manipulating ANL shares

RUBINA MALKANI (RM):

It has mentioned earlier that Ms.Rubina Malkani wife of Mr.Ghulam Muhammad Maikani, CEO of JS Global trading has also been found in nexus with other Group members. The financial records retrieved from the brokerage house (JS Global Capital) revealed that all the transactions were being carried out in name of G.M Malkani. Following are the Cheques issued and received during the review periods on behalf of Mrs.Rubina Malkani, all entitling Mr.Malkani instead of Mrs.Rubina herself:

***** ?3-■					
1	JS Global Capital	G.M.Malkani	17-06-08	448271	4,900,000
2	JS Global Capital	G.M.Malkani	23-06-08	448382	15,000,000
3	JS Global Capital	G.M.Malkani	26-06-08	448464	3,717,000
4	G.M.Malkani	JS Global Capital	13-06-08	7761024	23,500,000

Bank Name:

SAAD SAEED FAROOQUI fSSR:

A/C number:

MCB Clifton Branch 0074-01-01-0073412 12-03-2008 Sher Nabi Khan

Opening Date:

Nil

Introduced By:

Shahrukh S.Fraooqui (Brother)

Joint A/C Holder:

Nominee/Next to Kin:

Scrutinizing the above mentioned bank account of SSF following observations were made:

The only payment of Rs.7.5 million paid by SSF to JS Global as deposit of his huge trading activities was not issued by his above mentioned bank account. It is pertinent to mention here that the Cheque of the aforementioned amount was issued by the same bank account. [However the details of deposit slip showing the clearing stamp of MC8 has been sent to bank for further clarification on the issue]

- 3
- Ms. Naila Connection with Dagia family will establish who was using M.Iqbai as a front to trade in ANL shares, namely Abdul Hameed Dagia. While Umer's name (a resident of Damori, Tehsil Alpuri, District Shangla) as a joint account holder might have used to disguise the crucial information of Ms. Naila Account.

Payments of substantial amounts, Rs.180 million received from JS Global were transferred to Mr_Ali Jehangir Siddiqui account.

Another substantial payment of Rs.90 million received from JS Global was transferred to Crosby Securities Pakistan Pvt Limited.

ZAIBUHISSA (ZB1:

Bank Name:	JS Bank, Shaheen Complex Branch
A/C number:	0000109644
Opening	24-11-2007
Oate:	not clear from Bank account opening form Ahmed s/o A.Razzak Nil
Introduced	
By:	As it has stated earlier that ZB maintains her bank account with JS Bank jointly with Ahmed s/o A.Razzak. It is important to mention here that HBL Account # 8121-2, Rampat Road Achi Kabar, Karachi has been given in JS Global account opening form as client (ZB) bank account instead of JS Bank.
Joint A/C Holder:	
Nominee/Next to Kin:	

While not a single transaction has been carried out through HBL bank account instead all transactions have taken place in JS Bank , which itself is an accused in ANL price manipulation and an associate company of JS Group.

Further not a single fund transfer was signed by ZB. Ouring the period of almost one year ail funds received in the joint account of ZB and Ahmed, were withdrawn by Ahmed Abdul Razzak and all in from of Cash.

MUHAMMAD ASIF MENDHA (MA1W:

Bank Name:	MCB, PNSC Branch
A/C number:	0069-01-02-4887-7
Opening Oate:	23-12-2003 Nayyar A.
introduced By:	Farooqui Nil
Joint A/C Holder:	

Nominee/Next to Kin: Irfan Amanullah C/O Attock Cement Pakistan Limited

Mr.Mendha is a resident of Garden West Karachi; his occupation has been mentioning "Business" in his bank account opening form.

The following note, written by the bank official has also been found on account opening form:

'Account is being introduced by the official of M/S Attock Cement and they have also Informed us that Mr. Muhammad Asif Mendha will keep substantial balance in his account'

Asif Mendha also opened another bank account during the second review period with JS Bank (one of the accused). The details of this bank account are as following:

Bank Name: JS Bank DHA Branch
A/C number: 200009737
Opening Date: 13-02-2008
Introduced By: Not
mentioned Joint A/C Holder: Nil
Nominee/Next to Kin: Rizwana Abdul Sattar (wife)

It is pertinent to mention here that the bank account opening form of Mr Ashraf Dossani the CEO of Live Securities reveals Mr.Irfan Amanullah as his cousin. Live Securities is the brokerage house which has been used to carry out hefty transactions on behalf of Mr.Mendha.

ZEHRA NAZIM AZIZ fZNAV

Zehra w/o Nazim Aziz maintains her account with Bank Al-Habib Stock Exchange branch. During the investigation, the brokerage house (Aziz Fidahusseini & Co) provided a power of attorney mentioning that Mr.Irfan Aziz is an authorized person to use the proceedings of Ms.Zehra account. However, following are the basic account information of ZNA:

Bank Name: Bank Al-Habib Limited Stock Exchange Branch
A/C number: 071-003644-01-6
Opening Date: 14-04-2005
Introduced By: irfan Aziz
Joint A/C Holder: Razia Bano w/o Aziz Fidahusseini

Nominee/Next to Kin: Aziz Fidahusseini

The details of ZNA bank account further strengthened the fact that the financial transactions taken place in her account as a result of her trading proceeds were all in the family. Not only Mrs.Razia Bano wife of Mr.Aziz Fidahussein has issued various Cheques as a joint account holder but also major payments received have ultimately transferred to Aziz Fidahussein & Co account. Details have been given under the individual head of ZNA.

SABA IRFAN AZIZ (SIA1:

During the investigation it was disclosed that Ms. Saba maintains her accounts with Bank Al-Falah and JS Bank but her main transactions were carried out through JS Bank. Further all the major funds received in their joint account were subsequently transferred to Aziz Fidahussein & Co or just withdrawn in the form of Cash. Details have been provided under the individual head of Saba Irfan Aziz.

Following are the bank account information pertains to both JS Bank and Bank Al-Falah, where she has joint account with her husband Mr.Irfan Aziz:

JS BANK

Bank Name:	JS Bank- Stock Exchange Branch
A/C number:	240002474
Opening Date:	30-11-2007
Introduced By:	Iqbal Rangila (who introduced the account of Mehboob Kaiyar also)
Joint A/C Holder:	Irfan
Aziz Nominee/Next to	
Kin:	Nil

The purpose of opening this account was shown as investing in shares.

Bank Al-Falah

Bank Al-Faiah Stock	Bank Name:	Exchange Branch 02001180
06-11-2007	VC number:	
Aziz Fidahussein & Co	Opening	Pvt (Ltd)
Irfan Aziz Nil	Date:	
	Introduced	

The purpose of By: opening this account was shown as investing in shares
however no major transactions were carried out through this account and
ultimately the account Joint A/C Holder: was closed.
Nominee/Next to Kin:

6.1 to 6.8 6.9

6. DETAILS OF GROUP MEMBERS

Shaikh Family and Fronts

to 6.18 6.19

JS Group Companies & Funds managed by JS Investment JS

to 6.29 6.30

Associates/Employees/Clients Aziz Fidahussein & Co/Associates Asif

to 6.33 6.34

Mendha (Live Securities)

6.1 Begum Aftab Kari (BAK):

Begum Aftab Kari w/o Muhammad Sadiq is a JS Global client; she is the mother of Nasreen Humayun Shaikh, the main sponsor of ANL Her account revealed major trading in ANL shares and the bulk was conducted with other group clients. BAK account opening form revealed that Humayun N. Shaikh is the nominee as well as the authorized person to operate BAK’s account along with Nasreen.H.Shaikh and Ahmed Shaikh. As per BAK CNIC, she is a resident of Karachi but the details on account opening form, at the brokerage house provides a Lahore address which is the same as that of Mr. & Mrs. Humayun Shaikh.

Reportedly, Mrs.Nasreen Shaikh has told in one of her an interview to a leading newspaper that her mother Mrs.Aftab Kari has been expired. The copy of news paper clipping has been attached in Annexure 6.1A. It is therefore our belief that BAK is front of Humayun Shaikh and that her account is being used by him to manipulate the price of ANL shares.

Trading Pattern in Ready & CFS Market in Review Period 1:

During the period under review, daily trading pattern in ready & CFS market of BAK is as

DATE	Opening CFS	READY TRANSC AL	MARKET 'IONS	Closing CFS
	Finartcee	BUY QTY	SALE QTY	Finance
20070402	4,011,500			4,011,500
20070403	4,011,500		650,000	3,833,500
20070411	3,833,500	1,000	”	3,833,500
20070420	3,833,500	-	883,000	3,833,500
20070423	3,833,500	100,000		3,833,500
20070427	3,833,500		604,500	3,833,500
20070502	3,833,500	.	202,500	3,833,500
20070503	3,833,500	-	2,149,000	3,833,500
20070507	3,833,500			1,572,500
20070509	1,572,500	570,000	274,000	1,572,500
20070515	1,572,500	58,500		1,280,000
20070528	1,280,000			880,000
20070607	880,000		650,000	880,000
20070608	880,000			335,000
20070612				

	3db,000			107,500
20070622	107,500			94,500
20070625	94,500	.	1,000,000	94,500
20070709	94,500	-	1,000,000	94,500
20070710	94,500	-	1,200,000	94,500
20070713	94,500			94,500
Grand Total		729,500	8,613,000	

CDC Information:

CDC Information of Begum Aftab Kari		
BALANCE AS AT	CDC A/C#	BALANCE
April 02,2007	Sub VC # 6168	11,499,313
July 18,2007		9,610,313

, < ^!*v .iA^itecogpt^eran^iliatioq.of.B^K^ccpunt tn.ljirst.Review	^Ssharra?®'	iiiiiiiifi iiHSlii
Opening CDC Balance As on April 2nd,07	11,499,313	
Opening CFS Balance As on April 2nd,07	4,011,500	
Total ■	wmmmm	.15;510,813
Total Buy During the Period	729,500	
Total Setl During the Period	(8,613,000)	
		f&62f313v
AdjustmentfffCDS •- .?■ i*.'.		
No of shares received from Nasreen Shaikh during review period	2,000,000	
No of shares Purchased on 11-04-07 but not received in CDS	(1,000)	
No of shares received from Saira Ghaffar on 04-05-2007	124,113	
No of shares Purchased on 15-D5-07 but not received in CDS	(58,500)	
Less no of shares out from CDS on 03-05-2007	14,000	
Spot Purchase on 04-05-2007	(113)	
Excess no of shares out from CDS on 03-D5-2D07	(1,000)	
Adjustment Balance	2,077,500	
	Riiiiiitiitt	- 9,704,813
Closing CDC Bal As on July 18, 2007	(9,610,313)	
Closing CFS Balance July 13 2007	(94,500)	
Totaf Cluing Balanc^app^iirig^atJulyl8,2<X)7:^^^k^		WJ04,813)
Diffe rrice1h`Cldsfrtg"^IanqppliS^^^lii^ffi^ ^pPt8^^^Rj^^^ppPi		

Trading Pattern in Ready & CFS Market in Review Period 2:

AljnanbeeJIB^	mmmm	9,500	58000	pnancee.-
-				4-Mar-08
	490,000			7-Mar-08
	500,000			10-Mar-08
	t®!390i000	9,500	GrandTotalRV^ £*i:	

CDC Information:

CDC Information of Begum Aftab Kari ;		
BALANCE AS AT	CDC A/C#	BALANCE
November 29,2007	Sub A/C # 6168	9,646,813
April 22,2008		6,724,313

onlReiiw;PerIpdC^		
Opening COC Balance As on Nov 29,2007	9,646,813	
Opening CFS Balance As on Nov 29,2007	58,000	
T j i r t f l i i / ^ v : : v o V		
Total Buy During the Period	9,500	
Total Sell During the Period	(990,000)	
CDCbalanceafteracyustinibuyin&^elling	iiHffiMBSS, ■ •i'-L-	IM8;724^313^'
Off-Market Sale of 700,000 shares on 04-04-2008	(700,000)	
Sale of 1.3 million shares (appearing in CDS 07-04-08) has no supporting entry	(1,300,000)	
Balance should be appeared on July 182007 , ^ , r ; •		
Closing COC Bal As on April 22,2008	(6,724,313)	
Closing CFS Balance April 22,2008	-	
		fti&8\$
Difference in Closl ng		»*lloI\$»

Payment Details:

We examined the financial records of the brokerage house entries pertaining to BAK during the both the Review Periods and found the following mentioned payments which are also crossed checked with SBP:

PAYMENTS ISSUED BY JS GLOBAL TO BAK			
Date	Instrument	Amount	Cross verification from SBP
04-05-2007	0087247	5,000,000	Received on 07-05-2007
08-05-2007	0087312	57,000,000	Received on 08-05-2007
28-06-2007	0088585	21,500,200	Received on 28-06-2007
28-06-2007	0088592	21,500,200	Received on 28-06-2007
12-07-2007	0088841	105,000,000	Received on 12-07-2007
12-03-2008	30787635	29,000,000	Received on 12-03-2008
04-04-2008	33207004	51,900,000	Received on 04-04-2008
07-04-2008	33207009	95,700,000	Received on 07-04-2008
Total Payments		2,65,700,000	

The further verification of all the above mentioned payments received, from JS Global revealed the fact that all these funds were subsequently transferred to other beneficiaries mostly to Shaikh family and JS Global itself, the following movement of funds in BAK account showed that her account was only using as 'Parking account' among the other beneficiaries:

1	} "TIEEr--"					
	4/5/2007	5,000,000	JS Global Capital	Begum Aftab Kari		
			Begum Aftab Kari		JS Global Capital	3,436,000
					Nasreen H.Shaikh	1,564,000
2	8/5/2007	57,000,000	JS Global Capital	Begum Aftab Kari		
			Begum Aftab Kari		Invest & Financee Securities	56,911,360
						^6^11,360.
3	28/06/2007	21,500,200	JS Global Capital	Begum Aftab Kari	Jahangir Siddiqui & Sons	21,500,000
		21,500.200	Begum Aftab Kari		Cash Withdrawal	21,207,500
				MS		:f£2,7P7,5qq,;;
4	12/7/2007	105,000,000	JS Global Capital	Begum Aftab Kari		
			Begum Aftab Kari		First Dawood Bank Ltd	104,487,671

		TV,,";	...			wmSTO ^{1"1} .
5	12/3/2008	29,000,000	JS Global Capital	Begum Aftab Kari		
			Begum Aftab Kari		Ahmed H.Shaikh	29,000,000
.	•	ir'w'-W				mammy
6	4/4/2008	51,900,000	JS Global Capital	Begum Aftab Kari		
			Begum Aftab Kari		JS Global Capital	11,900,000
					JS Global Capital	40,000,000
		L'- ii-v.,,"				
7	7/4/2008	95,700,000	JS Global Capital	Begum Aftab Kari		
			Begum Aftab Kari		Nasreen Shaikh	44,700,000
					JS Global Capital	11,000,000
					JS Global Capital	34,000,000
					Humayun Shaikh	6,000,000
				'V,		^^^polbbd

It is important to mention here that all the aforementioned Cheques issued by BAK, was signed by Mr.Humayun Shaikh as Humayun Shaikh and his wife has taken authority to use her bank account.

Following mentioned is one payment was made by BAK to JS Global during the first review period, which Humayun Shaikh paid from his own account:

		Amount-	
19-06-2007	44161404	10,000,000	issued from Humayun Shaikh Account

The supporting documents of the above mentioned information have been provided in Annexure 6.1

Details of Alleged Violations

Cross Trades

The trading details of BAK showed that she bought 729,500 shares and sold 8,613,000 during the first review period. Of the above mentioned shares, she bought **46.47% from group** members and sold **85.46% to group** members including Humayun Shaikh family. Please see **Annexure 6,1.1** for details of trades, which were crossed with group members.

REVIEW PERiOD#:

BEGUM AFTAB KARI CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD APRIL 02 TO JULY 13,2007 .7 7			
Client	BAK Total Quantity Bought /	Counter -Client	.Quantity Sold
Begum Aftab Kari	729,500	Shazia Sadiq	264,000
Begum Aftab Kari		Khalid Rafi	75,000
Total			. 339,000
V . ■; 'S-:v!jV ■■ ; ■ : • 46.47% Cross Trades wjth Group members			

BEGUM A FTAB KARI CROSS \DES WiTH OTHER GROUP s			
TR/ MEMBER			
FOR THE PERI00 APRil 02 TO JULY 13, 2007			
Client	^ BAK Total Quantity	Counter K^ient / ;> S.	Quantity Bought
Begum Aftab Kari	8,613,000	Saad Saeed Farooqui'	2,653,500
Begum Aftab Kari		Aalia Sheeraz Monnoo	2,200,000
Begum Aftab Kari		Muhammad Ibrahim	1,000,000
Begum Aftab Kari		Amna Shaikh	650,000
Begum Aftab Kari		*Nasreen Shaikh	650,000
Begum Aftab Kari		Shazia Sadiq	207,500
Total	8,613,000		7,361,000
-A :- - ' 85.46% Cross Trades w			Wlmupmemtos
. 47.54% Cross Trades with Family Members			

REVIEW PERIOD # 2

Similarly, the trading details of BAK during the second review period showed that she sold 990,000 shares out of which 69.60% shares were sold to group members. Please see the Annexure 6.1.2 for details of cross trades.

AETAB KARI WADES WITH OTHER CROSS GROUBMEiViBE			
. ^!-; ^^^^pR^HE;PERIOD:NOVEMBER,29^2007,TP;A^t22^0P8^.			
		-M^awssii	SiIW
BEGUM AFTAB KARI	990,000	SAAD SAEED FARUQUI	6D2,000
BEGUM AFTAB KARI		SHAZIA	87,000
	;^9P,OpO ^	.. ""A-	
u si4 ' * ! ' / ' : i f ? 1 " " k A ^			

Wash Trades:

As mentioned earlier in section 5.5.4 that Mr.Humayun Shaikh shares the following trading links with his other

4Nasreen Shaikh trade has been shown here as she is an integral part of Humayun Shaikh family and is her daughter .CDC transactions also showed free deliveries were made to BAK account from Nasreen Shaikh Account

Family members with respect to their trading accounts:

XITSSI'FE		
Begum Aftab Kari	Authorized and Nominee in BAK account. While allegedly expired Mr.Humayun Shaikh is the beneficiary of her account.	BAK has ultimate
Amna Shaikh	Joint Account Holder	
Aalia Shaikh	Joint Account Holder	

Keeping in view the above mentioned relationships of Mr.Humayun Shaikh, it can be concluded that he is the common beneficial owner of BAK, Amna Shaikh and Aalia Shaikh accounts, so that any kind of trading among these Shaikh family members does not change the beneficial ownership of ANL shares and thus lead to wash trades.

The following table reveals the BAK transactions with other family members:

BEGUM AFTAB KARI CROSS TRADES WITH SHAIKH FAMILY					
DATE	TIME	TYPE	PRIC	VOLUME	' Counter-Client ' #"
20070607	1115580006	SELL	36.65	500,000	AMNA HUMAYUN SHAIKH
20070607	1116590025	SELL	36.65	150,000	AMNA HUMAYUN SHAIKH
20070709	1113190045	SELL	48.9	100,000	AALIA SHERAZ MONNOO
20070709	1125280006	SELL	48.9	100,000	AALIA SHERAZ MONNOO
20070709	1130240019	SELL	48.8	100,000	AALIA SHERAZ MONNOO
20070709	1136480030	SELL	48.5	200,000	AALIA SHERAZ MONNOO
20070709	1206560019	SELL	48.2	200,000	AALIA SHERAZ MONNOO
20070709	1209470005	SELL	48.2	300,000	AALIA SHERAZ MONNOO
20070710	1116570007	SELL	47.7	500,000	AALIA SHERAZ MONNOO
20070710	1117460028	SELL	47.7	500,000	AALIA SHERAZ MONNOO
20070710	1118320024	SELL	47.6	100,000	AALIA SHERAZ MONNOO
20070710	1126270062	SELL	47.5	100,000	AALIA SHERAZ MONNOO
20070403	1353310008	SELL	22.75	500,000	NASREEN HUMAYUN SHEIKH
20070403	1353440017	SELL	22.75	150,000	NASREEN HUMAYUN SHEIKH
				3,500,000	

Overall Conclusion:

Based on the observations noted above it is evident that the account of Begum Aftab Kari was used by Humayun Shaikh and Nasreen Shaikh who were acting in concert with other members of the ‘Group’, and were involved in price manipulation of Azgard Nine shares during the two review periods. Humayun Shaikh has also been found violating the securities law by doing wash sales. By indulging in above referred manipulative and prohibitive activities Humayun Shaikh through BAK has violated the law and regulation such as:

6.2 Aalia Sheeraz Monnoo (ASM):

Aalia Sheeraz Monnoo w/o Sheeraz Jahangir Monnoo is a JS Global client. Her account opening form revealed that Mr. Humayun Shaikh and Mrs. Nasreen Shaikh are the joint account holders and are authorized to operate her account. Further investigation pointed out that both the joint account holders are the parents of ASM.

Trading Pattern in Ready & CFS Market in Review Period 1

During the period under review, daily trading pattern in ready & CFS market of ASM is as:

DATE	Opening CFS	READY MARKET TRANSACTIONS		Closing CFS
	Finanee	BUYQTY	SALEQTY	Finanee
20070709		1,000,000	.	1,000,000
20070710	1,000,000	1,200,000	-	2,200,000
20070713	2,200,000			2,200,000
Grand Total		2,200,000	-	

CDC Information:

CDC information of Aalia Sheeraz Monnoo		
BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	Sub VC# 7265	Nil
July 18,2007		Nil

IrstReweiiiperjod.^		
■:\F'if "»: & Period ^ ■ : ^'/. " t		ISPal%e'.
Opening CDC Balance As on April 2nd,07	0	
Opening CFS Balance As on April 2nd,07	0	
Total Opening Balance as at April 2nd,07 ■ v ^ i		Wm-^.
Total Buy During the Period	2,200,000	
Total Sell During the Period	-	
	-e--	
Closing CDC Bal As on July 18, 2007	-	
Closing CFS Balance July 13 2007	(2,200,000)	
Total Closing Balance appearing as at July		izzmboy
^Difference in Closing BalanM-^' ' ' , ^- ^ *^		

Trading Pattern in Ready & CFS Market: in Review Period 2

During the period under review, daily trading pattern In ready & CFS market of ASM is as:

DATE				
inwmm				
29-Feb-08	1,999,500	1,500	-	1,999,500
3-Mar-08	1,999,500	-	-	1,999,500
4-Mar-08	1,999,500	193,500	-	1,999,500
17-Apr-08	1,999,500	262,000	-	2,261,500
18-Apr-08	2,261,500	300,000	-	2,311,500
21-Apr-08	2,311,500	-	-	2,311,500
22-Apr-08	2,311,500	-	-	2,311,500
Grand Total		757,000	0	2,311,500

CDC Information:

CDC Information of Aalia Sheera; Monnao		
BALANCE AS AT	CDC A/C#	BALANCE
Nov 29 2007	Sub VC # 7265	200,500
April 22 2008		645,500

	Balance	Balance
Opening CDC Balance As on Nov 29,2007	200,500	
Opening CFS Balance As on Nov 29,2007	1,999,500	
Total Opening Balance		\$2,200,000
Total Buy During the Period	757,000	
Total Sell During the Period	0	
Closing CDC Bal As on April 22,2008	(645,500)	
Closing CFS Balance April 22,2008	(2,311,500)	
Total Closing Difference In		\$2,200,000

Payment Details:

During the course of investigation we examined the financial records of JS Global Capital and it was found that no payment has been made during the first review period either from the client to the brokerage house or vice versa. The huge quantities of shares (2.2 million) were found in CFS for almost for a year i.e from July 2007 to April 22, 2008.

However following two substantial payment transfers were traced from M.Ijaz account (another accused and an alleged employee of Azgard Nine) to her bank account

				18,000,000
M.Ijaz	Aalia Sheeraz	27-05-2008	819908	
M.Ijaz	Aalia Sheeraz	25-06-20Q8	819913	30,000,000

Similarly following two payments have been issued from her account on behalf of Riaz & Ijaz, other accused and alleged employees of Azgard Nine Limited the company owned by her family:

			1jil\^*!. 1 ^l:~ - t• - j _____.V	
Aalia Sheeraz	M.Riaz	11-02-2008	819930	15,000,000
Aalia Sheeraz	M.Ijaz	11-01-2008	819929	10,000,000

Both aforementioned payments have been issued from Account # 1002067 with MCB Premier Branch Lahore. It is also important to mention here that both these payments have been issued with the signature of Mr.Humayun Shaikh, her father.

The supporting documents of the above mentioned information have been provided in Annexure 6.1

Details of Alleged Violations

Cross Trades

ASM total trading volume is 100% cross trade with Begum Aftab Kari in first review period. Details of ASM Cross trading has been provided in Annexure 6.2.1 and 6.2.2.

Review Period 1

ASM CROSS TRADES WriH OTHER FAMILYMEMBERS		
Client	ASM Total Buy ' "v Counter-Client^ ■ .J	Quantity Sold
Aalia Sheeraz Monnoo	2,200,000 Begum Aftab Kari	2,200,000
Total	2,200,000 .. , ■ y ■■	% 2,200,000
-V 100%:CrossTrades wi		th Group members

Review Period 2

		SfRADESWrTHO'^HERGRpURiME M	
Aalia Sheeraz Monnoo	757,000	Crosby Dragon Fund	47,000
Aalia Sheeraz Monnoo		JS Investment Ltd	25,000
Aalia Sheeraz Monnoo		Shazia Sadiq	14,500
Aalia Sheeraz Monnoo		Aziz Fidahussein	2,500
Total ;:! p. ^	-, "757,000^	^.'11.76. % CrpssjTradTes	

Wash Sales

Mr.Humayun Shaikh is the joint account holder with ASM and also a nominee and authorized person to operate BAK account therefore there was no actual change of beneficial ownership took place hence a wash trade.

Overall Conclusion:

Based on the observations noted above it is evident that Mr.Humayun Shaikh and Nasreen Shaikh used Aalia Sheeraz Monnoo, as a front and acting in concert with other members of the 'Group', were involved in price manipulation of Azgard Nine Limited shares during the first review period. Thus Humayun Shaikh and Nasreen Shaikh have also been found violating the securities law by conducting wash sales. By indulging in above referred manipulative and prohibitive activities has violated the law and regulation such as:

- *Securities and Exchange Ordinance 1969, S-17(e), (ii), (Hi), (iv), (V)*

6.3 Amna Humavun Shaikh (AHS):

Amna Humayun Shaikh is a client of JS Global and daughter of Humayun and Nasreen Shaikh. Her name in account opening form has written as Amna Abid Farooq (may be name of her husband). Mr.Humayun Shaikh is the joint account holder. AHS has deposited 168,000 shares of ANL as the security against her trading in JS Global Capital

Trading Pattern in Ready & CFS Market in Review Period 1

During the period under review, daily trading pattern in ready & CFS market of AHS is as:

DATE ;	Opening CFS :	REDAY MARKET TRANSACTIONS		Closing CFS
	Finanee	BUY QTY	SALE QTY	Finanee
2007051a		277,5D0	-	277,500
20070523	277,500	25,000	.	277,500
20070524	277,500	-	637,500	-
20070528		259,000	-	159,500
20070529	159,500	250,000		190,000
20070530	190,000	25,000		190,000
20070531	190,000	25,000	.	190,000
20070601	190,000	141,500		190,000
20070604	190,000	12,500	-	202,500
20070607	202,500	650,000	150,000	852,500
20070612	852,500	-	357,500	487,500
20070613	487,500	.	975,000	
20070615	487,500	.	200,000	
20070620		90,000	-	
20070625		1,000,000		1,000,000
20070713	1,000,000			500,000
Grand Total		2,755,500	2,320,000	

CDC Information of Amna Humayun Shaikh		
BALANCE AS AT	CDC A/C#	BALANCE
April 02,2007	Sub A/C # 6150	10,072,669
July 18,2007		10,041,669

Opening CDC Balance As on April 2nd,07	10,072,669	
Opening CFS Balance As on April 2nd,07		
Total Buy During the Period	2,755,500	
Total Sell During the Period	(2,320,000)	
	WBSKM	nn^
CDS showing Purchase, made on 18-05-2007 not found in KATS data	58,500	
512,500 shares out from CDS against the sale of 487,500 in KATS	(25,000)	
Balance should be #, M		
Closing CDC Bal As on July 18, 2007	(10,041,669)	
Closing CFS Balance July 13 2007	(500,000)	
Differed* in		<i>mmmmm</i>

Payment Details:

We examined the financial records of the brokerage house entries pertaining to AHS during the First Review Period and found the following mentioned payment which is also crossed checked with SBP. This payment was subsequently transferred to Ahmed Shaikh account:

	kj&SjjgSfi&PAYMEf S	pg^UEDgjSBIGLQBat	
19-06-2007	0088382	26,000,000	Received in her account # 10062703 in MCB Premier Branch
20.06.2007	35476403	26,000,000	Transferred to Ahmed Shaikh Account

Similarly another substantial amount received in Amna Shaikh account was subsequently transferred to Humayun Shaikh account:

iMMLip aite-S MP			
04.10.2007	2095676	9,446,251	Received in her account # 10062703 in MCB Premier Branch
05.10.2007	35476405	9,436,000	Transferred to Humayun Shaikh Account

Following payment was issued by Amna Shaikh bank account on behalf of M.Riaz:

		.5. Date^iv':-		
JS Global	Amna Shaikh	11.01.2008	On-Line	5,800,000
Amna Shaikh	JS Global on behalf of M.Riaz	11-01-2008	35476407	5,800,000

Just like Aalia Sheeraz payments, all aforementioned payments issued from Amna Account were signed by Humayun Shaikh, her father.

It is important to mention here that like Begum Aftab Kari, Amna Shaikh also authorized Humayun Shaikh and Nasreen Shaikh to use her bank account. The authority letter received from MCB does not reveal any date on the authority letter.

The supporting documents of the above mentioned information have been provided in Annexure 6.1.

Details of Alleged Violations

Cross Trades

The trading details of AHS showed that she bought 2,755,500 shares and sold 2,320,500 during the review period. She bought 72.73 % of the above mentioned shares from the group members and sold 63.17% of the above mentioned shares to the group members. The details of cross trading have been provided in Annexure 6.3.1.

Review Period 1

Amna Shaikh	2,755,500	Muhammad Ibrahim	1,000,000
Amna Shaikh		Begum Aftab Kari	650,000
Amna Shaikh		Khalid Rafi	100,000
Amna Shaikh		Crosby Dragon Fund	225,000
Amna Shaikh		Saad Farooqui'	25,000
Amna Shaikh		Zehra	4000
Total	■ ■ ■ ■ C't		
			ffGroup members

AHS CROSS TRADES WITH OTHER GROUP MEMBERS .			
FOR THE PERIOD APRIL 02 TO JULY 13, 2007			
Client .	AHS Total Sale	Counter-Client	Quantity Bought
Amna Shaikh	2,320,500	JS Sons	920,000
Amna Shaikh		Saad Farooqui'	232,000
Amna Shaikh		Syed Nizam Shah	278,500
Amna Shaikh		Zehra	35,000
Total	2,320,500		1,465,500
63.17% Cross Trades with Group members			

Wash Sales

AHS being family member of Humayun Shaikh family traded large amount of quantity with other family member either directly or indirectly. On 25.06.2007, she bought 1 million shares from MI who bought these shares from BAK on the same day. On 07.06.2007 she bought 650,000 shares directly from BAK.

Since Mr.Humayun Shaikh is the joint account holder with AHS and also a nominee and authorized person to operate BAK account therefore there was no actual change of beneficial ownership and hence a wash trade.

Overall Conclusion:

Based on the observations noted above it is evident that Humayun Shaikh and Nasreen Shaikh used Amna Humayun Shaikh as a front and acting in concert with other members of the 'Group', were involved in price manipulation of Azgard Nine Limited shares during the review period. Humayun Shaikh and Nasreen Shaikh have also been found violating the securities law by conducting wash sales. By indulging in above referred manipulative and prohibitive activities they have violated the law and regulation such as:

Securities and Exchange Ordinance 1969, S-17(e), (ii), (iii), (iv), (v)

6.4 Nasreen Humavun Shaikh (NHS):

Nasreen Humayun Shaikh w/o Humayun Shaikh is the mother of two of the directors and CEO of ANL and holds the substantial shareholding in the company; she is also the client of JS Global Capital. NHS trading details revealed that she traded 4.7 miiiion shares during the second review period and almost 100% of her trading took place with other Shaikh family member's i.e Humayun Shaikh (Husband) and Ahmed Shaikh (son).

TRADING DETAILS OF NASREEN SHAIKH DURING REVIEW PERIOD 2:

DATE~^3]				
	•FinanceaTS			
4-Mar-08		9,500	-	-
19-Mar-08	-	4,700,000		-
25-Mar-08			4,700,000	
GrandTptall	mmmmmm			

CDC Information:

BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	A/C # 955	33,293,216
July 31,2007		48,663,750
November 29,2007		44,929,620
April 22,2008		51,475,120

^ ^Account R^ntliaUKMWHSAccount In Second	mraw	ppfe.*
Opening CDC Balance As on Nov 29,2007	44,929,620	
Opening CFS Balance As on Nov 29,2007		
Total		
Total Buy During the Period	4,709,500	
Total Sell During the Period	(4,700,000)	
	iSiSiiltt?	
Shares transferred from Faysai Bank against Repo Transaction	6,536,000	
Balance		# 5ii4Z542.0.
Closing CDC Bal As on April 22,2008	(51,475,120)	
Closing CFS Balance April 22,2008	-	
	PPSS	mmzs.mr

Payment Information:

Du ring the course of investigation we examined the financial records of JSGCL but no payment was found made to or received by the client during the second review period. However we obtain her bank account information which was ultimately closed down June 28, 2D07.The basic info of her account is as following:

Bank Name: MCB, Premier Branch Lahore

A/C number 14D0010117521

Opening 11-07-2005

Date: Amna Abid Farooq (Daughter)

Introduced Nil
Humayun Shaikh

She has also been found as Nominee in Begum Aftab Kari and Humayun Shaikh bank accounts. Following are the payments which have been transferred to her account from BAK account:
Joint A/C Holder

Nominee/Next to Kin				
Aftab Kari	Nasreen Shaikh	4/5/2007	1 7 0 4 2 2 1	1,564,000
Aftab Kari	Nasreen Shaikh	7/4/2008	485063	44,700,000

Further following are the payments which have been transferred in her account from M.Ijaz account (another accused and an alleged employee of Azgard Nine) to her account

M.Ijaz	Nasreen Shaikh	28-03-2008	819907	64,000,000
M.Ijaz	Nasreen Shaikh	25-06-2008	819912	19,300,000

The supporting documents of the above mentioned information have been provided in Annexure 6.1

Details of Alleged Violations

Cross Trades

The detail of

NHS CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
Client	Total Buy	Counter-Client	Quantity Sold
Nasreen Shaikh	4,709,500	Humayun Shaikh	2,100,000
Nasreen Shaikh		Ahmed Humayun Shaikh	1,700,000
Total	4,709,500		3,800,000
80.69% Cross Trades with Group members			

NHS CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
Client	Total Sell	Counter-Client	Quantity Bought
Nasreen Shaikh	4,700,000	Humayun Shaikh	2,055,000
Nasreen Shaikh		Ahmed Humayun Shaikh	1,255,500
Total	4,700,000		3,310,500
70.44% Cross Trades with Group members			

Wash Sales

NHS being family member of Humayun Shaikh family traded large amount of quantity with other family members. Since Mr.Humayun Shaikh and Mr.Ahmed Shaikh are the co-authorized persons with NHS therefore there was no actual change of beneficial ownership took place hence showed a wash trade, done by NHS.

Overall Conclusion:

Based on the observations noted above it is evident that Nasreen Shaikh, acting in concert wrth other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. She has also been found violating the securities law by doing wash sales. By indulging in above referred manipulative and prohibitive activities has violated the law and regulation such as:

Payment Information:
6.5 Humavun NaseerShaikh (HNS):

Humayun Shaikh is the father of two of the directors and CEO of ANL and the client of JS Global Capital. He is also the co-authorized persons for Nasreen and Ahmed Shaikh accounts and the joint account holder with both of his daughters' i.e Aalia and Amna Shaikh. HNS trading details revealed that he traded 2.1 million shares during the second review period and almost 100% of his trading took place with other Shaikh famiiy member's i.e Nasreen Humayun Shaikh (Wife) and Ahmed Shaikh (son).

TRADING DETAILS OF HUMAYUN SHAIKH DURING REVIEW PERIOD 2:

DATE A	Opening CFS	■ ■ ; - READY MARKETMiSiIg . ' .TR/WSCATIONS		
.. "I • • ■ s'y	Finances v	BUY QTY	^SALEQTYigI Si	
19-Mar-08		-	2,100,000	-
25-Mar-D8	.	2,100,000		-
:-GrandTotal #	tftlpviif^.	S'2;iCHD,OOGi		

CDC Information

- ^ ® CDC information of H		
BALANCE AS AT	CDC A/C#	BALANCE
April 02,2007	A/C # 2159	9,431,006
July 31,2007		14,194,472
November 29,2007		14,194,472
April 22,2008		14,194,472

; 5 - : Acco unt Reconciliation, Of HNS Accounting		Kon^eyiavM	
vfli;:. vr ;i		Itlhlii^	
Opening CDC Balance As on Nov 29,2007		14,194,472	
Opening CFS Balance As on Nov 29,2007		0	
Total Buy During the Period		2,100,000	
Total Sell During the Period		(2,100,000)	
CDC balance after adjusting buying/selling during the period		:IS §gIMilf	liMC94'472'^^
Closing CDC Bal As on April 22,2008		(14,194,472)	
Closing CFS Balance April 22,2008		-	
■T(^IClbs)^Baia<;aj^			
: Difference fit Clafng Balance			

5 Securities and Exchange Ord/nance 1969, S-17(e), (ii), (Hi), (iv), (v)

During the course of investigation we examined the financial records of the said client and only one payment of Rs.3.7 million was found which made to Mr.Humayun Shaikh during the review period of his trading. We also obtained his bank account and the basic information of his account is as following:

Bank Name: NIB Gulberg Branch Lahore
VC number Opening 040210498110
Date: 17-03-2006
Introduced By: Jawaid Raza C/O Azgard Nine Nil
Joint VC Holder Nasreen Shaikh
Nominee/Next to Kin

This is very important to note that Humayun Shaikh is one of the key players of ANL price manipulation scheme. Being head of sponsor family of ANL shares, he used substantial quantities of ANL shares to create artificial activity in connivance with his other family members and JS Group officials. Besides doing his own trade and his family members' trade in the scrip of ANL he also used other clients' accounts both trading and bank to affect or manipulate the ANL price.

It has been earlier discussed in the report that he not only used his mother-in-law (BAK) trading account to do manipulative activities but also maliciously used her bank account to receive and send payments for various business purposes. He not only signed the Cheques on her behalf [bank confirmation required] but also received the following is the payment he has received from BAK bank account:

Issuer	Beneficiary	Date	Instrument #	Amount
Aftab Kari	Humayun Shaikh	07-04-2008	485062	6,000,000

Following mentioned is one payment which Humayun Shaikh paid from his own account on behalf of BAK to JS Global during the first review period:

	Bar ft lyr-"; ■ J -		BUI
19-06-2007	44161404	10,000,000 issued from Humayun Shaikh Account	

In the similar way, he helped his employees to open their bank accounts and than used them for his own manipulative purposes. Ijaz and Riaz bank accounts have been opened with this purpose.

Following are the payments he has received from M.Riaz bank account:

	mBeheficiaW			
M.Riaz	Humayun Shaikh	30-10-2007	NIB Internal Transfer	76,064,000
M.Riaz	Humayun Shaikh	22-03-2008		50,700,000
M.Riaz	Humayun Shaikh	27-03-2008		46,000,000
M.Riaz	Humayun Shaikh	05-06-2008		6,000,000

In the similar way he also used M.Ijaz account wherein he was an authorized person to use his account along with his two sons. Following is the payment he has received from M.Ijaz bank account:

M.Ijaz	Humayun Shaikh	18-06-2008	819911	3,999,000

Further he also funded the trading of both his fronts in the scrip of ANL. Following payments were issued by Humayun Shaikh on behalf of Riaz& Ijaz to JS Global Capital:

	:^,Pefjflciary;a			MwWNUW!6 'IfiPIIfiiHWH M ^{1*} F".i
Humayun Shaikh	M.Riaz	17-12-2007	13671114	49,000,000
Humayun Shaikh	M.Ijaz	17-12-2007	13671115	3,000,000

Humayun Shaikh has also availed the Running Finance Facility against the ANL shares for the purpose of meeting their capital requirement and to invest in stocks and shares as reported by the *NIB* Bank. Following are the details pertaining to their Running Finance facility:

am^' vmm*			
Humayun Shaikh Azgard Nine Ltd	5,765,000	30.53	176,005,450

The supporting Documents of the above mentioned information have been provided in Annexure 6.1.
Details of Alleged Violations

Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.5.1.

6 Securities and Exchange Ordinance 1969, S-17(e), (ii), (Hi), (iv), (v))

HNS CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
Client	Total Buy	Counter Client	Quantity Sold
Humayun Shaikh	2,100,000	Nasreen Humayun Sheikh	2,055,000
Total	2,100,000		2,055,000
97.86% Cross Trades with Group members			

	^QSSiRADE^EFMiST^ ERGTOLJ		
	FyMEWB£		
	mmmmmm		
Humayun Shaikh	2,100,000	Nasreen Humayun Sheikh	2,100,000
.Total			
			iiisiii®

Wash Sales

HNS being family member of Shaikh family traded large amount of quantity with other family members. Since Nasreen Humayun Shaikh and Ahmed Shaikh are the co-authorized persons therefore there was no actual change of beneficial ownership took place hence showed a wash trade, done by HNS.

Overall Conclusion:

Based on the observations noted above it is evident that Humayun Shaikh, acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. He has also been found violating the securities law by doing wash sales. By indulging in above referred manipulative and prohibitive activities has violated the law and regulation such as:

6.6 Ahmed Humavun Shaikh (AHS1:

Ahmed Shaikh is the Director and CEO of Azgard Nine Limited and belongs to Shaikh family as described earlier in various clients accounts. AHS trading details revealed that he traded 1.7 million shares during the second review period and 100% of his trading took place with other Shaikh family member i.e Nasreen Humayun Shaikh (mother)

TRADING DETAILS OF AHMED SHAIKH DURING REVIEW PERIOD 2:

Payment Information:

During the course of investigation we examined the financial records of the said client and only one payment of Rs.3.1 million was found which made to Mr.Ahmed Shaikh during the review period of his trading. We also obtained his bank account and the basic information of his account is as following:

NIB

Bank Name:

Gulberg Branch Lahore 040210497310

17-

A/C number

03-2006

Opening Date:

Jawaid Raza C/O Azgard Nine Nil

Introduced By:

Humayun Shaikh

JointtyC Holder

Nominee/Next to Kin

Similar to his mother and father he was also beneficiary of other people payment transfers following are the details:

			NIB Internal Transfer	
M.Riaz	Ahmad Shaikh	27-05-2008		39,900,000
M.Riaz	Ahmad Shaikh	27-03-2008		97,000,000
M.Riaz	Ahmed Ahsan FVt Limited	28-03-2008		51,500,000
Begum Aftab Kari	Ahmad Shaikh	12-03-2008	485057	29,000,000
Begum Aftab Kari	Ahmad Shaikh	11-03-2008	485056	4.000.000

He also like his father funded the trading of one of his family front; following payment was issued by Ahmed Shaikh on behalf of Riaz to JS Global Capital:

Issuer	Beneficiary	Date	Instrument	Amount
Ahmed Shaikh	M.Riaz	10-04-2008	72422186	90,000,000

Ahmad Shaikh has also availed the Running Finance Facility against the ANL and JSCL shares for the purpose of meeting their capital requirement and to invest in stocks and shares as reported by the NIB Bank. Following are the details pertaining to their Running Finance facility:

Running Finance Facility				
Ahmed Shaikh	Azgard Nine Ltd	4,400,000	30.53	134,332,000
	Jahangir Siddiqui &Co	119,000	96.67	11,503,730

The supporting Documents of the above mentioned information have been provided in Annexure 6.1.

The detail of cross trade for second review period has been provided in Annexure 6.6.1.

Details of Alleged Violations

Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.6.1.

	fifrotalJBuyi#		
Ahmed Humayun	1,700,000	Nasreen Humayun Shaikh	1,255,500
Total/; :• ■ '.fe®	;; 1,700,000 >		
	v5^ ^3^%Crc^Tradesy		iliiiiE!

EipERIOpeNOVEMBEK29^2OeTOMPRII^ ^;2Opa»Wi«gii'			
	ajSTotalSeli	\.ii!';^:::Counter gC1ient^QuaMtyiEtoJJghtiS	
Ahmed Humayun	1,700,000	Nasreen Humayun Shaikh	1,700,000
Total - • >.y.'-	. 1,700,000		
y;3. ■.....	^n^SiIGQK Crossgrade , with Group		

Wash Sales

AHS being family member of Shaikh family traded large amount of quantity with other family members. Since Ms.Nasreen Humayun Shaikh and Mr.Humayun Shaikh are the co-authorized persons with AHS therefore there was no actual change of beneficial ownership took place hence showed a wash trade, done by AHS.

Non-Declaration of Profit

Following table reveals the profit made by Ahmed Shaikh he bought 1.7 million shares at an average rate of Rs.60.7 and sold at an average of Rs.62.60 and made profit of Rs.3.3 million but did not declare under the section 224 of company ordinance.

	STKTINOa		13TRA		imm	mm	mmmm
19-Mar-08	65876468	1217300001	SELL	.	200,000	62.6	(12,520,000)
19-Mar-08	65876371	1217120001	SELL		300,000	62.6	(18,780,000)
19-Mar-08	65874987	1214030053	SELL	.	300,000	62.75	(18,825,000)
19-Mar-08	65874923	1213540034	SELL	.	300,000	62.75	(18,825,000)
19-Mar-08	65876310	1216560025	SELL	-		62.6	(18,780,000)

19-Mar-08	65876340	1217040013	SELL	-	300,000	62.6	(18,780,000)
25-Mar-08	66248241	1348500045	Buy	156,000	-	60.7	9,469,200
25-Mar-08	66248210	1348460003	Buy	294,000	-	60.7	17,845,800
25-Mar-08	66248209	1348460002	Buy	6,000	-	60.7	364,200
25-Mar-08	66248268	1348560034	Buy	56,000	-	60.7	3,399,200
25-Mar-08	66248248	1348520009	Buy	144,000	-	60.7	8,740,800
25-Mar-08	66248145	1348360045	Buy	299,500	-	60.7	18,179,650
25-Mar-08	66248238	1348500037	Buy	6,000	-	60.7	364,200
25-Mar-08	66248166	1348410005	Buy	294,000	-	60.7	17,845,800
25-Mar-08	66248165	1348410004	Buy	500	-	60.7	30,350
25-Mar-08	66248160	1348400017	Buy	299,500	-	60.7	18,179,650
25-Mar-08	66248159	1348400016	Buy	500	-	60.7	30,350
25-Mar-08	66248239	1348500038	Buy	144,000	-	60.7	8,740,800
				1,700,000	1,700,000		(3,320,000)

Overall Conclusion:

Based on the observations noted above it is evident that Ahmed Shaikh, acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. He has also been found violating the securities law by doing wash sales. By indulging in above referred manipulative and prohibitive activities has violated the law and regulation such as:

- *Securities and Exchange Ordinance 1969, S-17(e), (ii), (Hi), (iv), (v)*
- *S-224 trading by directors, officers and principal shareholders.*
Muhammad Riaz (MR):

Muhammad Riaz has been identified as client of JS Global Capital and front of Shaikh family. His trading history shows that his major trading pertains to ANL and JSCL. During the second review period he bought 9 million shares and sold 6 million, out of which 27% were bought from the Group members while substantial 56% were sold to Group members.

It is also important to mention here that MR actually started trading in ANL shares, in the month of August 2007 (period does not come under both the review periods) and his major portion of trading was carried out as cross trades with other Group members. The following table shows the trading details carried out by him in the subject month:

	.CJierrt Name ."	Bought Qty	nts			-Jibs Qty
Aug 7 2007	MUHAMMAD RIAZ	2,050,000	M.lqbai	1,664,ODD	39	81.17%
		• 2,970,000				

After the month of August 2007, MR remained passive and reactivated in the second review

period. TRADING DETAILS OF MUHAMMAD RIAZ FOR REVIEW PERIOD 2:

	iFS		mmmm	mm
10-Dec-07	634,000	250000	0	884000
12-Dec-07	884,000	100000	0	984000
13-Dec-07	984,000	1041500	0	984000
17-Dec-07	984,000	152500	0	984000
2-Jan-08	709,000	114000	0	1098000
lCkJan-08	1,098,000	150000	0	1248000
ll-Jan-08	1,248,000	75000	0	1323000
15-Jarv08	1,073,000	105500	0	1428500
17-Jan-08	1,328,500	375000	0	1803500
18-Jan-08	1,803,500	100000	0	1903500
30-Jan-08	1,903,500	75000	0	1978500
31-Jarv08	1,978,500	5000	0	1983500
12-Feb-08	1,444,500	0	30000	1564500
29-Feb-08	1,564,500	601500	0	2066000
3-Mar-08	2,066,000	537000	0	2496000
4-Mar-08	2,496,000	9500	0	2496000
6-Mar-08	2,416,000	0	100000	2416000
ll-Mar-08	2, < +ie> ,uu u	103500	0	2416000
12-Mar-08	2,416,000	248000	0	2416000
13-Mar-08	2,057,000	250000	0	2557000
14-Mar-08	2,557,000	200000	0	2557000
18-Mar-08	2,557,000	0	1463500	2557000
25-Mar-08	1,531,500	2000	3602000	1531500
26-Mar-08	1,531,500	0	900000	1531500
31-Mar-08	1,531,500	200000	0	1731500
3-Apr-08	1,436,000	334500	0	1989500
4-Apr-08	1,758,500	735000	0	2483500
7-Apr-08	2,483,500	2000000	0	4142500
8-Apr-08	4,092,500	1000000	0	4198500
ll-Apr-08	4,198,500	120000	0	4198500
16-Apr-08	3,698,500	220000	0	3868500
,Grant^ paji^#?	iMim	mmmmm	•Wit	

CDC information:

I-,-,----- CnnUnfnmrt;		
BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	22058	2,336,000
April 22,2008		2,275,500

' *' 1 latforVof jyi tfr		Si^ - «% IPaiance.J
Opening CDC Balance As on Nov 29,2007	2,336,000	
Opening CFS Balance As on Nov 29,2007	634,000	
		≈ 1∞
Total Buy During the Period	9,104,500	
Total Sell During the Period	{6,095,500)	1
	'a'-X&jir*"M&i	mmf
Less: shares received in CDS against 13-12-2007 purchase 1,041,500 shares	(60,000)	1
Excess delivery received on 31-12-2007	225,000	
Balance a f t e r i j s mSW^MH		
Closing CDC Bal As on April 22,2D08	(2,275,5D0)	1
Closing CFS Balance April 22,2008	{3,868,500)	
Total		- ffct lp^44,00<j

Payment Information:

During the course of investigation we examined the financial records of JS Global. MR has an account in NIB, Gulberg Branch Lahore. The account opening form reveals that Mr.M.Riaz monthly income/salary is Rs.15000, other details of the account is as following:

NIB

Bank Name:

(former P1CIC Commercial Bank), Gulberg Branch Lahore

tyC number:

040201-36700-0010

Opening

2007

31-10-

Date:

Naimatullah (Also introduced M.Ijaz and BAK account)

Nil

Introduced

By:

Muhammad Nawaz

Joint A/C Holder:

Financial Records as provided by the Brokerage House:

The

Nominee/Next to Kin:

following mentioned two tables show the online transfers from M.Riaz to JSGCL and

JSGCL

to Riaz as provided by the brokerage house i.e JS Global Capital.

We independently verified this information from the bank account statement of the MR as acquired from SBP. The bank of MR i.e NIB Bank informed us that the following payments which have been reported by the brokerage house as payments ‘issued’ by M.Riaz, have not actually been issued from Riaz account, rather the payments were issued from different family members of Shaikh Family:

s ?' TV ; 'd;]-.' i					
i	Muhammad Riaz	JS Global Capital	27-12-2007	49,000,000	Issued from Humayun Shaikh account with difference in date
2	Muhammad Riaz	JS Global Capital	11-01-2008	58,600,000	issued from Humayun Shaikh Saudi Pak Bank account
3	Muhammad Riaz	JS Global Capital	11-01-2008 :	5,800,000	Issued from Amna Humayun Shaikh account
4	Muhammad Riaz	JS Global Capital	11-02-2008	15,000,000	Issued from Aalia Sheeraz Monnoo account
5	Muhammad Riaz	JS Global Capital	14-03-2008	15,000,000	Issued from Humayun Shaikh Saudi Pak Bank account
6	Muhammad Riaz	JS Global Capital	08-04-2008	13,000,000	To be checked from JS Bank
7	Muhammad Riaz	JS Global Capital	10-04-2008	90,000,000	Issued from Ahmed Shaikh account

Muhammad KiazJS Giooai uapitai21-04-200841,DUU,UU0NO such payment was traced in JSGCL Bank account. Further no supporting documents such as deposit slip or bank statement copy was provided by the brokerage house as provided in other cases.

However the following mentioned payments issued by JS Global to MR have been found in his account with NIB Bank.

1	JS Global Capital	Muhammad Riaz	20-03-2008	sojooloo^	Found
2	JS Global Capital	Muhammad Riaz	27-03-2008	172,600,000	Found
3	JS Global Capital	Muhammad Riaz	28-03-2008	55,600,000	Found

In continuation of the above, it is important to mention here that all the aforementioned payments received from JS | Global were further transferred to Shaikh family members by M.Riaz, Since all Shaikh Family members also maintain their accounts in the same bank all these payments have been transferred through internal transfers, details are as following:

20-03-2008	50,700,000	JS Global Capital	Muhammad Riaz		
22-03-2008 gigjgfSiii		Muhammad Riaz		Humayun Shaikh	50,700,000
					<u>0,700,000</u>
					-]
27-03-2008	172,600,000	JS Global Capital	Muhammad Riaz		
		Muhammad Riaz		Ahsan Shaikh	29,600,000
				Humayun Shaikh	46,000,000
				Ahmed Shaikh	97,000,000
					172,600,000
					*3
28-03-2008	55,600,000	JS Global Capital	Muhammad Riaz		
		Muhammad Riaz		Ashen Shaikh	4,100,000
				Ahmed Ashen Pvt Limited	51,500,000
					<u>aiigfess.eoo^QQ</u>

we runner extended our praoe and ooiainea ine aeians OT other major transacxidns tanen place in MH accoum ana the following details strengthened the link between MR and the Shaikh Family:

		""7W^ff7 ^				
i	30-10-2007	176,064,000	JS Global Capital	Muhammad Riaz		
	30-10-2007		Muhammad Riaz		Ashen Shai kh	100,000,000
	30-10-2007		Muhammad Riaz		Humayun Shaikh	76,064,000
fv,::				if*		*t76'064.000
2	5-Jun-08	30,000,000	JS Global Capital	Muhammad Riaz		
	5J un^08		Muhammad Riaz		Humayun Shaikh	6,000,000
	5-Jun-08		Muhammad Riaz		JS Global Capital	24,000,000
		pfiiiSlti&i?It				i\$o;ooo_ooog s
3	15-05-2008	25,600,000	JS Global Capital	Muhammad Riaz		
	15-05-2008		Muhammad Riaz		JS Global Capital	25,600,000
					*- ~ ft	
4	27-05-2008	39,900,000	JS Global Capita!	Muhammad Riaz		
	27-05-2008		Muhammad Riaz		Ahmed Shaikh	39,900,000
	'V '!...;■ WV					\$139.900,
5	28-05-2008	14,000,000	JS Globa! Capital	Muhammad Riaz		
	28-05-2008		Muhammad Riaz		JS Global Capital	14,000,000
	j,:-- >!			fiiswi		^;poo^pc>;i;
6	2/1/2008	130,000,000	JS Global Capital	Muhammad Riaz		
	2/7/2008		Muhammad Riaz		JS Global Capital	130,000,000
						Mi(?pp,pop3

The aforementioned payment details of MR bank account further reiterate the fact that his account was being used by the Shaikh family, the sponsors of Azgard Nine Limited in connivance with JS Global capital. The supporting Documents of the above mentioned information have been provided in Annexure 6.1.

Details of Alleged Violations

Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.7.1.

Muhammad Riaz	9,104,500	SAAD SAEED FARUQUI	819,000
Muhammad Riaz		ZEHRA	675,500
Muhammad Riaz		JS INVESTMENTS LIMITED	215,500
Muhammad Riaz		JS BANK LIMITED	166,500
Muhammad Riaz		MUHAMMAD ASIF MENDHA	149,500
Muhammad Riaz		CROSBY DRAGON FUND	147,500
Muhammad Riaz		SHAZIA	112,500
Muhammad Riaz		JS GROWTH FUND	56,500
Muhammad Riaz		SABA	42,000
Muhammad Riaz		RUBINA MALKANI	40,500
Muhammad Riaz		AZIZ F1DAHUSEIN & COMPANY (PRIVATE) LIMITED	20,000
Muhammad Riaz		JS INCOME FUND	10,000
Totaj			
■■ 'Vr.			

MR CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
Client	Total Sell	Counter Client	Quantity Bought
Muhammad Riaz	6,095,500	JS INCOME FUND	1,974,500
Muhammad Riaz		JAHANGIR SIDDIQUI SECURITIES SERVICES LIMITED	1,431,000
Muhammad Riaz		Rubina Malkani	4,500
Total	6,095,500		3,410,000
55.94% Cross Trades with Group members			

Overall Conclusion:

Based on the observations noted above it is evident that the account of M.Riaz was used by Humayun Shaikh and Ahmed Shaikh who were acting in concert with other members of the ‘Group’, and were involved in price manipulation of Azgard Nine shares during the two review periods. Humayun Shaikh has also been found violating the securities law by doing wash sales. By indulging in above referred manipulative and prohibitive activities Humayun Shaikh through BAK has violated the law and regulation such as:

6.8 Muhammad Ijaz (MI2):

Muhammad Ijaz has also been identified as client of JS Global Capital and front of Shaikh family. His trading history also shows that his major trading pertains to ANL and JSCL. During the second review period he bought 4.4 million shares and sold 3.6 million, out of which 26% were bought from the Group members while substantial 40% were sold to Group members.

It is also important to mention here that MI2 also started trading in ANL shares, in the month of August 2007 (period does not come under both the review periods) and his major portion of trading was carried out as cross trades with other Group members. The following table shows the trading details carried out by him in the subject month:

;; Date ; '		^ BoO^hlt Qty	Wierrt^ ^	i^Cross^Soj d ^	Rate ■	m
Aug 7 2007	MUHAMMAD IJAZ	2,002,000	M. Iqbal	1,758,000	39	87.81%
Total 'v^ .		2,884,500				

After the month of August 2007, MI2 remained passive and reactivated in the second review period.

TRADING DETAILS OF MUHAMMAD UAZ FOR REVIEW PERIOD 2:

	^Finanee ■■■;	(fl>gREADY: i mmsm MDyqw^'		podngjr
10-Dec-07	264,500	225,000	-	489,500
12-Dec-07	489,500	100,000	.	589,500
17-Dec-07	589,500	152,000	-	589,500
2-Jan-08	589,500	95,000		684,500
10-Jan-08	684,500	157,000	.	841,500
11-Jan-08	841,500	175,000		1,016,500
15-Jan-08	791,500	102,000		1,118,500
17-Jan-08	1,018,500	375,000	.	1,493,500

18-Jan-08	1,493,500	100,000		1,593,500
29-Feb-08	1,498,500	1,500	-	1,498,500
4-Mar-08	1,498,500	9,500	-	1,498,500
12-Mar-08	1,498,500	226,000	-	1,498,500
13-Mar-08	1,234,000	250,000		1,524,000
14-Mar-08	1,524,000	200,000	-	1,524,000
18-Mar-08	1,524,000	-	1,463,500	1,524,000
26-Mar-08	390,000	-	2,200,000	390,000
31-Mar-08	390,000	200,000	-	590,000
4-Apr-08	590,000	675,000	.	1,122,000
8-Apr-08	1,122,000	1,000,000	-	1,972,000
11-Apr-08	1,972,000	141,000	-	1,972,000
16-Apr-08	1,682,000	220,000	-	1,855,500
fraldrllil				

CDC Information:

BALANCE AS AT	CDC VC#	BALANCE
November 29,2007		2,749,500
April 22,2008		2,404,500

MKi		
Opening CDC Balance As on Nov 29,2007	2,749,500	
Opening CFS Balance As on Nov 29,2007	264,500	
Total Buy During the Period	4/404,000	
Total Sell During the Period	(3,663,500)	
CDCbalanceaftBMdlcltinfewn^^UMmilfngthiB-p^od^/Mg-^y		
Excess Delivery received on 31-12-2007	225,000	
Excess Delivery received on 12-12-2007	25,000	
Excess Delivery received on 17-12-2007	55,000	
Short delivery of 2,000,000 shares against the sale of 2,200,000 shares	200,000	
BalanM		4,260,000
Closing CDC Bal As on April 22,2008	(2,404,500)	
Closing CFS Balance April 22,2008	(1,855,500)	
Total Closing Balande"ap^'ng as at'April 22^008 \$\$		^(4,260,000)

Payment Information:

During the course of investigation we examined the financial records of the said client and various online transfers both from the brokerage house and the clients were observed. We independently verified this information form the bank account statement of the said client as acquired from SBP.

Following are the bank account details of MI2:

Bank Name: MCB, Premier Gulberg Lahore branch

A/C number: 007-858203-1002068

Opening Date: 30-07-2007

Introduced By: Naimatullah (Also introduced M.Riaz and BAK account)

Joint A/C Holder: Nil

Nominee/Next to Kin: Shahid Aslam

The following table reveals the payments issued by MI2 to JS Global but no such payment has been debited from his above mentioned bank account

7						
1	Mohd.Ijaz	JS Global Capital	27-11-2007	On line transfer	24,906,000	To be checked from JS Bank
2	Mohd.Ijaz	JS Global Capital	17-12-2007	On line transfer	3,000,000	Issued from Humayun Shaikh account
3	Mohd.Ijaz	JS Global Capital	11-01-2008	On line transfer	40,500,000	No such payment was traced in JSGCL Bank account. Further no supporting documents such as deposit slip or bank statement copy was provided by the brokerage house as provided in other cases.
4	Mohd.Ijaz	JS Global Capital	11-01-2008	On line transfer	10,000,000	Issued from Aalia Sheeraz account
5	Mohd.Ijaz	JS Global Capital	14-03-2008	On line transfer	14,000,000	Issued from Humayun Shaikh Saudi Pak Bank account
6	Mohd.Ijaz	JS Global Capital	08-04-2008	On line transfer	9,000,000	To be checked from JS Bank

]

]

]

]

Following are the payment issued by JS Global in name of MI2 during the second review period as stated by the brokerage house:

[REDACTED]						
1	JS Global Capital	Mohd.Ijaz !	2003-08	On line transfer	57,800,000	Found
2	JS Global Capital	Mohd.Ijaz :	28-03-08	: On line transfer	64,000,000	Found

Extending the probe of MI2 bank account following trend was observed where the funds received from JS Global Capital were ultimately transferred to other Group members prominently Shaikh family members:

31	[REDACTED]					
i	30-10-2007	175,840,000	JS Global Capital	Muhammad Ijaz		1
			Muhammad Ijaz		Jahangir Siddiqui & Sons	175,840,000 [
						^175^,000 f
2	20-03-2008	57,800,000	JS Global Capital	Muhammad Ijaz		
			Muhammad Ijaz		JS Global Capital	57,700,000
						;f^ ^oo,p(WfsJ
3	28-03-2008	64,000,000	JS Global Capital	Muhammad Ijaz		64,000,000 1
			Muhammad Ijaz		Nasreen Shaikh	
						*64.000,000
4	27-05-2008	43,000,000	NiB Guiberg Br	Muhammad Ijaz		
			Muhammad Ijaz		Aalia Sheeraz Monnoo	18,000,000 ■
					JS Global Capita!	25,000,000
			%■	i		7^/XX),QQ0
5	11/6/2008	j 1,275,000	NiB Guiberg Br	Muhammad Ijaz		*
			Muhammad Ijaz		Azgard Nine Limited	1,175,000 J,
		iSSfKSfSti		Ai	msmmmm	

	1 (•ut>-zuuts	j,yyy,uuu	Jii uiooai Capital	munammaa Ijaz		
	18-06-2008		Muhammad Ijaz		Humayun Shaikh	3,999,000
■ • ^ "						f£g ^ £M,qg&--'.
7	25-06-2008	49,300,000	JS Global Capital	Muhammad Ijaz		
			Muhammad Ijaz		Nasreen Shaikh	19,300,000
					Aalia Sheeraz Monnoo	30,000,000
			:-T ■ .. ~ ■			

The supporting Documents of the above mentioned information have been provided in Annexure 6.1.
Details of Alleged Violations

Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.8.1.

Client iiiSifi			
Muhammad Ijaz	4,404,000	Saad Saeed Faruqui	536,500
Muhammad Ijaz		Crosby Dragon Fund	331,000
Muhammad Ijaz		Zehra	147,500
Muhammad ijaz		Muhammad Asif Mendha	81,000
Muhammad Ijaz		JS Bank Limited	30,000
Muhammad Ijaz		Saba	7,500
Muhammad Ijaz		Aziz Fidahusein & Company	5,000
Muhammad Ijaz		Rubina Malkani	4,500
Muhammad Ijaz		Shazia Sadiq	3,500
L ■ Jpj J?			

Muhammad ijaz 1 3,663,500	JAHANGIR SIDDIQUI SECURITIES SERVICES LIMITED	1,451,500
Total		m&sscat
	m&Bww&w*	!Mil ^iTIbe.rs

Overall Conclusion:

Based on the observations noted above it is evident that the account of M.Ijaz was used by Humayun Shaikh and Ahmed Shaikh who were acting in concert with other members of the 'Group', and were involved in price manipulation of Azgard Nine shares during the two review periods. Humayun Shaikh has also been found violating the securities law

by doing wash sales. By indulging in above referred manipulative and prohibitive activities Humayun Shaikh through BAK has violated the law and regulation such as:

6.9 Jehangir Siddiaui & Company Limited fJSCU:

Jahangir Siddiqui and Co is an investment company and second largest shareholder in Azgard Nine Limited, owing 20.43% shareholding at the starting of first review period. During this period the company bought 11.9 million shares, which increased its total shareholding up to 24.36%. JSCL has been found as an active trader in ANL shares during the review period April 02 to July 13, 2007. The company is primarily involved in financial services and listed on KSE. Mr.Ali Jehangir Siddiqui is simultaneously on the board of directors of Jahangir Siddiqui & Co and Azgard Nine Limited.

JSCL has been working through various brokerage houses including JSGCL during the first review period only. The brokerage house wise break up of the trading has been provided in the following table:

Brokerage House	Buy Qty	Avg-Rate	Buy Value	, % wj.t total trading
BMA Capital	1,398,500	35.24	49,294,500	11.73%
Live Securities	500,500	36.04	18,040,825	4.19%
Alfalah Securities	200,000	33.97	6,794,750	1.67%
JS Global Capital	5,421,500	33.72	182,818,675	45.48%
First National Equity	4,400,000	34.19	150,462,400	36.91%
				iiisiSH;

Trading Pattern in Ready & CFS Market

During the period JSCL has only bought the shares of ANL the date wise trading detail in the Ready & CFS Market is as following:

Date	Opening CFS	READY MARKET TRANSACTIONS		Closing CFS
	Finanee	Buy-Qty	Sale Qty	Finanee ' '
20070402	2,600,000	-	-	2,600,000
20070403	2,600,000	-	-	1,850,000
20070404	1,850,000	-	-	600,000
20070409	600,000	-	-	-
20070515	-	884,000	-	-
20070516		35,000	-	-
20070517	-	868,000	-	-
20070518		3,726,500	-	-
20070521	-	4,134,500	-	-
20070524	-	400,000	-	-
20070525	-	1,872,500		-
Grand Total	-	11,920,500	< -	

Opening CDC Balance As on April 2nd,07		61,664,827	
Opening CFS Balance As on April 2nd,07		2,600,000	
Total			
Total Buy During the Period		11,920,500	
Total Sell During the Period		-	
Closing CDC Bal As on July 18, 2007		(76,185,327)	
Closing CFS Balance July 13 2007			r
			y* m&m&m

CDC Information:

mmwtfSK&m					
April 02,2007	Sub A/C # 1276	7,400,000	House A/C 00422	54,264,827	61,664,827
July 18,2007		10,000,000		66,185,327	76,185,327
November 29, 2007		10,000,000		66,185,327	76,185,327
April 22,2008		10,000,000		66,185,327	76,185,327

Payment Information:

During the course of investigation we examined the financial records of the said client and the following payments were found:

JAHANGIR SIDDIQUI & CO.			
Issued by	Received by	Date	Amount (Rs.)
JS &CO	JS GLOBAL	6/4/2007	5,922,499
JS&CO	JS GLOBAL	6/4/2007	76,780,093
JS GLOBAL	JS&CO	23/05/07	19,031,103
JS &CO	JS GLOBAL	22/05/07	25,151,718
JS &CO	JS GLOBAL	18/05/07	16,003,188
JS &CO	JS GLOBAL	12/4/2007	90,663,516
JS GLOBAL	JS&CO	9/4/2007	57,273,444
JS GLOBAL	JS&CO	21/05/07	120,481,918

Details of Alleged Violations Cross Trades

The trading details of JSCL showed that it has bought 11,920,500 shares during the review period. JSCL played a major role in creating the artificial volume in the scrip of ANL. Following table reveals the JSCL cross trading (49.15% of total JSCL traded with other Group members during the review period April 02 to July 13, 2007.The detail of cross trade has been provided in Annexure 6.9.1

1	EIERII @F?Iip^n	3JULY.132Q0i7.^ ^	m&gmm9
		j^GoOlfttia^irenfc^	
Jahangir Siddiqui & Company	11,920,500	Zehra	5,479,500
Jahangir Siddiqui & Company		Shazia	325,000
Jahangir Siddiqui & Company		Rubina Malkani	55,000
iiTotali;			iMHRgKSB
§ 49^5^ <>0£&Trade			

Following are the two instances revealing specific Cross trades among the JSCL, ZNA and SSF:

Instance# 1

On May 18,2007, JSCL bought 3.7 million shares out of which 84% (3.12 million shares) were bought from ZNA a client of Aziz Fidahussein & Co Limited. While ZNA has bought 2 million shares on the same day from SSF another client of JSGCL. The average rate JS & Co buying was Rs.34.02 while ZNA bought these shares on average rate of 33.98 from SSF.

It is to note further that on May 18, 2005 the total turnover in the scrip of ANL was 10 million shares out of which 50% (5.3 million shares) was created by the cross trade of JSCL, ZNA and SSF.

9 Securities and Exchange Ordinance 1969, S-17(e), (ii), (v)

Instance# 2

On May 21, 2007, JSCL bought 4.1 million shares out of which 49.51% (2.34 million shares) were bought from ZNA. While ZNA has bought 642,000 shares on the same day from SSF and RM, other clients of JSGCL.

It is to note further that *on May 21, 2007* the total turnover in the scrip of ANL was 9 million shares out of which 45% (4.1 million shares) was created by the cross trade of JSCL, ZNA and SSF.

Overall Conclusion:

Based on the observations noted above it is evident that Jahangir Siddiqui and Company, acting in concert with other members of the ‘Group’, was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, JSCL has violated the law and regulation such as:

6-10 Jehangir Siddiqui & Sons (Private) Limited (JSSPL):

JSSPL is a private limited company of JS Group, the main business of JSSPL is to invest in securities market. As per Form A, submitted on November 30, 2007 MrJehangir Siddiqui holds 99% holding in the said company.

Following are the directors of the company:

1.

Jahangir Siddiqui

Director/Member
2.

Mohammad Suleman Kanjiani

CEO/Director
3.

Suleman Lalani

Director

Trading Pattern in Ready & CFS Market in Review Period 1:

During the period JSSPL has mainly bought the shares of ANL, the date wise trading detail in the Ready Market & CFS is as following:

Date	OpeningCFS	READY MARKET TRANSACTIONS		Closing CFS
	Finanee	Buy-Qty	Sale Qty	Finanee
20070605		-	113,500	
20070611		113,500		-
20070613		3,040,500		3,040,500
20070614	3,040,500	2,097,000		5,122,500
20070622	5,122,500	930,000		6,052,500
20070713	6,052,500			6,052,500
Grand Total		6,181,000	113,500	

CDC Information:

CDC Information of Jahangir Siddiqui Sons (Pvt) Limited		
BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	Sub A/C # 11218	7,254,500
July 18,2007		7,269,500

;AO ■ ifi Account R^ntiliation of JS Sons Aocoi		
		jfilBafancerh^
Opening CDC Balance As on April 2nd,07	7,254,500	
Opening CFS Balance As on April 2nd,07	-	
		IiiSZSBspgs;
Total Buy During the Period	6,181,000	
Total Sell During the Period	(113,500)	
CDCpalanceafteradJustlngbuying/sdllng during t h e ^		
Closing CDC 8al As on July 18, 2007	(7,269,500)	
Closing CFS Balance July 13 2007	(6,052,500)	
Tota/ Closing Balance appearing as at July18,2007MM		mi3,32Z000)
· Differem^'in"Ciffiing Bai^cQ^";ift^"^^^"^^		

Trading Pattern in Ready & CFS Market in Review Period 2:

asm	m n&n reaafeSffK		t^T3RANSi^TO^fPjP	^BjrtRlntf- P Esv'K	
6-Dec-07	4,042,500	-	5,625,000	-	
23-Jan-08	-	-	3,254,500	-	
25-Jan-08	-	-	800,000	-	
H\$tu					

C TO C (Off -Market Transactions)

					Rate
12-Mar-08	JS Sons	Pak Oman Asset Management	JS Global	1,500,000	64.5
12-Mar-08	JS Sons	Rashid Munir	JS Global	1,733,000	64.5

CDC Information:

CDC Information of Jahangir,Siddiqui Sons (Pvt) Limrted		
BALANCE AS AT	CDC A/C#	BALANCE
November 29,2007	Sub A/C #11218	8,837,000
April 22,,2008		3,233,000

		IHWBM&
Opening CDC Balance As on Nov 29,2007	8,837,000	
Opening CFS Balance As on Nov 29,2007	4,042,500	
Total Opening Balance As on Nov 29,2007		^i2am5m
Total Buy During the Period		
Total Sell During the Period	(9,679,500)	
CDC balance as on April 22,2008		
Spot Purchase on 29-01-2008	33,000	
Off market sell on 12-03-2008	(3,233,000)	
Spot Purchase on 15-03-2008	3,233,000	
Closing CDC Balance As on April 22,2008	(3,233,000)	
Closing CFS Balance April 22,2008	0	
Difference In Closing Balance		ifet^33_ <X)0) % MMMRNHto

During the course of investigation we examined the financial records of the said client and the following payments were found:

j K+ fc; ■ 5^1 £ •/->? • :M i .m , \ 11 I10			
JS GLOBAL	JS & SONS	8/6/2007	4,104,639
JS & SONS	JS GLOBAL	13/6/2007	4,078,364
JS GLOBAL	JS&SONS	18/06/2007	489,646
JS&SONS	JS GLOBAL	19/06/2007	364,946
JS&SONS	JS GLOBAL	28/06/2007	9,365,093
JS&SONS	JS GLOBAL	28/06/2007	100,000,000
JS&SONS ;	JS GLOBAL	3/7/2007 !	3,516
JS GLOBAL	JS&SONS	19/07/2007	13,718,701
JS&SONS	JS GLOBAL	20/7/2007	17,676,323

Details of Alleged Violations

Cross Trades

JSSPL is also a major player in creating the artificial volume in the scrip of ANL. During the review period April 02 to July 13, 2007, JSSSPL bought 6,181,000 shares out of which 3,263,000 shares were bought from Group members constituting 52.79% of its total trading volume. The detail of cross trade for first review period has been provided in Annexure 6.10.1.

10 Securities and Exchange Ordinance 1969, S-17(e), (ii),(v)

Review Period 1
Payment Information:

		₹	HBMWMBIM;
■ i y- '■ ∴ ?£ ■.*>'!•(> v .			illllliyf
Jahangir Siddiqui & Sons	6,181,000	Amna Shaikh	920,000
Jahangir Siddiqui & Sons		JS Investment Bank	831,500
Jahangir Siddiqui & Sons		Zehra	822,000
Jahangir Siddiqui & Sons		Syed Nizam Shah	400,000
Jahangir Siddiqui & Sons		Crosby Dragon Fund - 203,000
Jahangir Siddiqui & Sons		Saad Saeed	40,000
Jahangir Siddiqui & Sons		Rubina Maikani 46,500
Total	■ - ' 6,181,000 ..		
■ J s; i*_*_* \ f'			

Specific Instance Of Cross Trade:

On June 13, 2007 JSSPL bought 3 million shares, out of which 68% were bought from Group members to create artificial turnover. The break up is as following:

Counter Parties	Sharessdd	Brokerage House 4 i K f :	^wjritotaUSSPLVol
Zehra Nazim Aziz	822,000	Aziz Fidahussein	27%
Amna Humayun Shaikh	920,000	JS Global Capital	30%
JS Investment Bank	212,000	JS Global Capital	7%
Other JSGCL clients	119,000	JS Global Capital	4%

Review Period 2:

Similarly, the trading details of JSSPL during the second review period showed that it has sold 9,679,500 shares. In percentage terms, JSSPL sold 56.52% of the above mentioned shares to the group members. The detail of cross trade for second review period has been provided in Annexure 6.10.2

JAHANGIR SIDDIQUI & SONS CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
JAHANGIR SIDDIQUI & SONS	MHBMMWtotal SfrtrSsMSBfe	Counter Client	Quantity Bought
	9,679,500	ZEHRA	5,471,000
Total	9,679,500		5,471,000
56.52% Cross Trades with Group members			

Overall Conclusion:

Based on the observations noted above it is evident that Jahangir Siddiqui and Sons, acting in concert with other members of the 'Group'¹, was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, JSSL has violated the law and regulation such as:

6.11 J S Bank Limited formerly Jahangir Siddiaul Investment Bank (JSBU):

JSBL is also a part of JS Group and working as an investment bank. JSBL is a JSGCL client and sold large number of shares during our review period April 02 to July 13, 2007. Mr Jahangir Siddiqui is on board of directors. JSBL is also a JSGCL client and sold large number of shares during our review period April 02 to July 13, 2007.

Trading Pattern in Ready & CFS Market in Review Period 1

During the period JSBL has mainly sold the shares of ANL, the date wise trading detail in the Ready & CFS Market is as following:

Date	Opening CFS	READY MARKET TRANSACTIONS		Closing CFS
	Financee	Buy-Qty	■SaleQty;'-.-.-;W	Financee
20070402				
20070424				
20070427				
20070502			85,000	
20070503		-	275,000	
20070608		-	51,000	
20070611		-	300,000	
20070612		-	128,000	
20070613		2,500	602,500	
20070614		-	300,000	
20070615		-	1,000	
20070622			299,000	
20070709		250,000	-	
Grand Total		252,500	2,041,500	

C TO C (OUT OF KATS1 TRANSACTIONS

	>. VT;CLIENT				
				iiitiiii®	
30/04/2007	Saad Farooqi	5,000,000	29		
30/04/2007	JS Bank			5,000,000	29
2/5/2007	JS Bank	5,000,000	29		
2/5/2007	Saad Farooqi			5,000,000	29

CDC Information of Jahangir Siddiqui Bank Limited		
BALANCE AS AT	CDC A/C#	BALANCE
April 02,2007	Sub A/C # 3590	5,939,109
July 18,2007		4,150,000

Opening CDC Balance As on April 2nd,07	5,939,109	
Opening CFS Balance As on April 2nd,07	-	
		MK&ggii
Total Buy During the Period	252,500	
Total Sell During the Period	(2,041,500)	
Spot Sale 109	(109)	
	i&s	
Closing CDC Bal As on July 18, 2007	(4,150,000)	
Closing CFS Balance July 13 2007	-	
	iiiiigggi	iiiiisg

Trading Pattern in Ready & CFS Market in Review Period 2

isap	i£penin&^^			jBsseai
	;FinanceeJ^®R			
28-Mar-08			300,000	
7-Apr-08	-	-	200,000	
10-Apr-08	.		342,500	
14-Apr-08		.	157,500	
15-Apr-08	-		150,000	
16-Apr-08	.		450.000	
17-Apr-08		.	100,000	

CDC Information:

CDC Information of Jahangir Siddiqui Bank Limited ^ IM		
BALANCE AS AT	cocyyc#	BALANCE
November, 29 2007	Sub A/C # 3590	4,300,000
April 22,2008		2,600,000

s'^tt^'^ii'Accburrt' R^ncjliation^pf JS; Ban^Ac^		smmm-
: V ^Period ■? V" v^ ' "• V-^		
Opening CDC Balance As on Nov 29,2007	4,300,000	
Opening CFS Balance As on Nov 29,2007	-	
Total Buy During the Period	-	
Total Sell During the Period	(1,700,D00)	
cDcmmmmmmm^mmeüünmring mmm		mmmm'i
Closing CDC Bal As on April 22,2008	(2,600,000)	
Closing CFS Balance April 22,2008	0	
		mmrnoom^
:Differenceiin/ptcs^iigfeaian®^i i'i'^s^'^'^'^'^'^^		

Payment information:

Ouring the course of investigation we examined the financial records of the said client and the following payments were issued:

T£us39/" .''			
sSv^':->»v.		■■■■■■	
JS GLOBAL	JS BANK	4/5/2007	144,735,500
JS BANK LTD	JS GLOBAL	15-06-07	11,477,293
JS BANK LTD	JS GLOBAL	12/7/2007	24,268,597
JS GLOBAL	JS BANK LTO	27/06/07	54,750,764
JS GLOBAL	JS BANK LTD	19/06/07	11,973,801
JS GLOBAL	JS BANK LTD	18/06/2007	22,831,139
JS GLOBAL	JS BANK LTD	8/5/2007	8,221,026

Details of Alleged Violations Wash

Trade

JSBL was found doing a wash trade on July 20, 2007 selling 305,000 shares from its client code (2490) with JS Global Capital to HJSB another JSBL client code maintaining with Aziz Fidahusseini & Company. Following are the details of the transactions:

20-Jul-07	49125739	2490	1554310025	SELL	305,000	39.25	11,971,250	HJSB

Cross Trades in Review Period 1

JSBL's trades mainly contributed to SALE during the first review period, its total selling volume was 2,041,500 shares out of which 1,302,000 shares were sold to JSGCL clients, constituting 64% of total JSBL trading. The detail of cross trade for first review period has been provided in Annexure 6.11.1.

JS Bank CROSS TRADES WITH OTHER GRDUP MEMBER			
r; ■ FDR THER ERIOD iPRIL 02 sTO JULY 13 20Q7 /;			
Client	JSBL Total Buy .-V w	Counter -Client; r; "";	Quantity Sold
JS Bank Limited	252,500	Saad Farooqui'	197,500
JS Bank Limited		Crosby Dragon Fund	25,000
Total	. 252,500 .		. ■ 222,500
88.12% Cross Trad^with Group members			

11 Securities and Exchange Ordinance 1969, S-17(e), (ii), (Hi), (iv), (v)

■" :.ft ft ^ijOientrj^^		HEtIGROURMFMBFRaa^^g	
JS Bank Limited	2,041,500	JS SONS	831,500
JS Bank Limited		Saad Farooqui'	285,000
JS Bank Limited		Mashooq Ali Kaiyar	57,000
JS Bank Limited		Syed Nizam Shah	50,000
JS Bank Limited		JS Securities	39,500
JS Bank Limited		Shazia	22,000
JS Bank Limited		Crosby Dragon Fund	21,000
			iM.3G6.000

Review Period 2

Similarly, the trading details of JSBL during the second review period showed that it sold 1,700,000 shares. In percentage terms, it has sold 38.91% of the above mentioned shares to the group members. The detail of cross trade for second review period has been provided in Annexure 6.11.2.

		<i>mmmmamm</i>	
JS Bank Limited	1,700,000	Saba	300,000
JS Bank Limited		Muhammad Riaz	166,500
JS Bank Limited		Asif Mendha	76,000
JS Bank Limited		Js investments Limited	54,000
JS Bank Limited		Muhammad Ijaz	30,000
JS Bank Limited		Js income Fund	24,000
JS Bank Limited		Shazia	11,000
		<i>mamm</i>	

Overall Conclusion:

Based on the observations noted above it is evident that JS Bank, acting in concert with other members of the Group', was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, JSBL has violated the law and regulation such as:

6.12 Jahangir Siddiaui Securities Services Limited (JSSSL):

JSSSL deals in marketable securities and another stakeholder in Azgard Nine Limited besides Jahangir Siddiqui and Company. Mr. Abdul-Hamid Dagia is the CEO of the company. JSSSL is also a client of JSGCL.

Trading Pattern in Ready & CFS Market in Review Period 1

Following are the details of JSSSL in Ready and CFS markets:

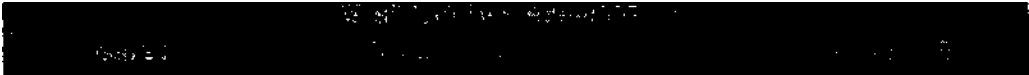
fijjp	lpjMning CFS A	^CREADY^FitKiS^	WSCATIONSH.	
20080102		1,131,500	-	-
20080103		395,000	-	-
20080104		221,000	-	-
20080107	"	56,000	-	-
20080108	-	592,500	-	-
20080109	-	5,681,000	-	-
20080318	-	2,927,000	-	-
	-! 'y-yy	¥S:S^li^6d4,obo>		

CDC Information:

CDC Information of Jahangir Siddiqui Securities Services Limited		
BALANCE AS AT	CDC A/C#	BALANCE
November 29,2007	Sub A/C # 3413	155
April 22,2008		11,004,155

	SetxindiReview^Ee	-y 0^ jfl '
Opening CDC Balance As on Nov 29,2007	155	
Opening CFS Balance As on Nov 29,2007	-	
Total Opening	smmmm	
Total Buy Ouringthe Period	11,004,000	
Total Sell During the Period	-	
		ij\$a4 ttj£E55^
	■ \ »V: ?-'*\$£ r-*V--	
Closing CDC Bal As on April 22,2008	(11,004,155)	
Closing CFS 8aiance April 22,2008		
Total Closing Balance appearIngas at April 22,2008 -;^ti0-\$4,		mil*004;t 55fe

During the course of investigation we examined the financial records of the said client and the following payments were issued:



JS GLOBAL	JS SEC SER LTD	3/7/2007	154,235
JS GLOBAL	JS SEC SER LTD	28/06/2007	56,411,867
JS GLOBAL	JS SEC SER LTD	27/04/07	6,634,850
JS SEC SER LTD	JS GLOBAL CAP	31-05-07	13,538,550
JS GLOBAL CAP	JS SEC SER LTD	14/06/07	51,617,917
JS SEC SER LTD	JS GLOBAL CAP	16/06/07	80,648,713

Details of Alleged Violations

Cross Trades

The trading details of JSSSL showed that it has bought 1,075,000 shares and sold 1,075,000 during the review period. JSSSL trading was found only on June 13, 2007 revealing the same quantity of shares bought and sold during the day. Following two tables revealed that JSSSL has bought 43.53% shares from the Group members and sold 98.05 % to another group client Zehra. The detail of cross trade for first review period has been provided in Annexure 6.12.1

JS SECURITIES CROSS TRADES WITH OTHER GROUP MEMBER			
Client Name	JSSSL Total Buy	Counter Party Client Name	Quantity Sold
JS Securities Services	1,075,000	Mehboob Ali Kaiyar	428,500
JS Securities Services		JS Investment Bank	39,500
Total	1,075,000		468,000
43.53% Cross Trades with Group members			

JS SECURITIES CROSS TRADES WITH OTHER GROUP MEMBER			
Client Name	JSSSL Total Sold	Counter Party Client Name	Quantity Bought
JS Securities Services	1,075,000	Zehra	1,054,000
Total	1,075,000		1,054,000
98.05% Cross Trades with Group members			

Review Period 2

Similarly, the trading details of JSSSL during the second review period showed that it bought 11,004,000 shares. In percentage terms, JSSSL bought 80.6% of the above mentioned shares from the group members. The detail of cross trade for second review period has been provided in Annexure 6.12.2.

12 Securities and Exchange Ordinance 1969, S-17(e), (ii) (v)

r.Xİientg^lil	SISSMIMi\$1^	J.' i^6urte^rtiT		
JS Securities Services	11,004,000	JS Capital Protected Fund İi	3,328,000	
JS Securities Services		Muhammad İjaz	1,451,500	
JS Securities Services		Muhammad Riaz	1,431,000	
JS Securities Services		JS Investments Limited	800,000	
JS Securities Services		Saad Saeed Faruqui	777,500	
JS Securities Services		JS Capital Protected Fund	546,500	
JS Securities Services		Crosby Dragon Fund	390,500	
JS Securities Services		Aziz Fidahusein & Company	89,000	
JS Securities Services		fly feina-Malkani	41,000	
JS Securities Services		'WOffammacTAsifM end ha	13,000	
Total				

Overall Conclusion:

Based on the observations noted above it is evident that Jahangir Siddiqui and Securities Services Limited, acting in concert with other members of the ‘Group’, was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, JSSSL has violated the law and regulation such as:

6.13 JS Aggressive Assets Allocation Fund (Formerly) UTP Aggressive Assets Allocation Fund:

UTP is a fund managed by JS Abamco. As per the account opening form MrAli Raza Siddiqui and Mr. Suleman Lalani (JS Group Directors) are the authorized persons to invest in the securities market on behalf of the UTP AAA Fund. UTP AAA Fund sold large quantities of shares during the month of April 2007. The major chunk was sold to JSGCL clients to create demand in the market.

Trading Pattern in Ready & CFS Market in Review Period 1

Date	Opening CFS	READYMARKET TRANSACTIONS		Closing CFS
	Finanee	Buy<Jty	Sale Qty ;	Finanee
20070409	-	0	20,000	-
20070410	-	0	100,000	-
20070411	-	0	900,000	-
20070412	-	0	400,000	-
20070418	-	0	887,000	-
20070420	-	0	3,000,000	-
Grand Total r;			5,307,000	

C TO C (OUT OF KATS TRANSACTIONS)

	ni=-=V ■ -s ■ ■ /ff			9MPK
22/06/2007	Atlas Bank	2,000,000	43.00	
22/06/2007	UTP Aggressive Fund			2,000,000 43.00
25/06/2007	UTP Aggressive Fund	2,000,000	43.02	
25/06/2007	Atlas Bank			2,000,000 43.02

CDC Information:

CDC Information of UTP Aggressive Allocation Fund		
BALANCE AS AT	CDC A/C#	BALANCE
April 02,2007	tyC # 6221	7,307,000
July 18,2007		2,000,000

■ ti; ^ Ac^untR^riciliatioabfUTP.AAARAcx»uinti^F	[#13teviem enod -	iSll
Opening CDC Balance As on April 2nd,07	7,307,000	
Opening CFS Balance As on April 2nd,07	-	
Total Opening Balance as at April 2nd,07 . V ; V : -		
Total Buy During the Period	-	
Total Sell During the Period	(5,307,000)	
CDC ba/ance after adjustfng buying/selling during the period V- - ^		mmem
Closing CDC Bal As on July 18, 2007	(2,000,D00)	
Closing CFS Balance July 13 2007	-	
		^QQtiOQOf
Wffare^In jciaa^ . ' \	PFSEy^ . ■ ~ flKjTj*®?; sj s /■ jj ¹⁴ ;	

Payment Information:

During the course of investigation we examined the financial records of the said client and the following payments were issued by JS Global to UTP Aggressive allocation fund:

UTP AGGRESSIVE FUND			
Issued by	Received by	Date	Amount (Rs.)
JS GLOBAL	UTP AGGRESSIVE FUND	27/06/D7	85,828,000

Details of Alleged Violations Cross Trades

UTP trading details revealed that UTP has only been a seller of shares during the first review period and out of 5,307,0 shares UTP has sold 3,492,500 shares to Group clients, which constitutes 65,81% of total UTP turnover. The detail of cross trade for first review period has been provided in Annexure 6.13.1

UTP CROSS TRADES WITH OTHER GROUP MEMBER			
FOR THE PERIOD APRIL 02 TO JULY 13 2007			
■ Client ■	UTP Total	Counter-Client :	Quantity
JS AGGRESSIVE ALLOCATION FUND	5,307,000	Shazia	1,973,500
JS AGGRESSIVE ALLOCATION FUND		Saad Farooqui'	1,050,000
JS AGGRESSIVE ALLOCATION FUND		Crosby Dragon Fund	469,000
Total	5,307,000		3,492,500
65.81% Cross Trades with Group members			

13 Securities and Exchange Ordinance 1969, S-17(e), (ii), (v)

Instance# 1

On April 20, 2007, total 3 million shares sold by UTP, out of which 2.9 shares were mainly sold to two clients of JSGCL i.e Saad Saeed Farooqui’ (1 million shares) and Shazia Sadiq (1.9 million shares). Who are members of manipulating Group.

The average price of selling to these two clients was Rs.26.25. The price history on April 20, 2007 has mentioned below:

Date	Opening Rate	High Rate	Low Rate	Closing Rate	Closing Rate Change		Turnover
					Price Percentile		
20-Apr-07	26.55	27.85	26.20	27.35	0.80	3.01%	10,820,500

Overall Conclusion:

Based on the observations noted above it is evident that UTP Aggressive Allocation Fund, acting in concert with other members of the ‘Group’, was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, UTP has violated the law and regulation such as:

JS INVESTMENTS LIMITED (JS ABAMCO):

JS Investments Limited formerly JS ABAMCO is an Assets Management subsidiary of Jahangir Siddiqui Company Limited as per their annual report 2007.The quarterly statement of JSIL for the period March 31, 2008. shows an investment of Rs.197 million in ANL. which constitutes 63% of total investment of JSIL in unrelated parties.

All five funds managed by the subject AMC, have acted as separate accused in the case of ANL. Except JS Aggressive Allocation Fund formerly UTP Aggressive Allocation fund, which has covered earlier in the first surge all other funds' trading activities have been depicted as following along with JS Investments own trading:

TRADING DETAILS OF JS INVESTMENTS (JS ABAMCO) DURING REVIEW PERIOD 2:

HI	0peWM::CR5M i-		TRANSCATIONS;	S
14-Dec07		0	2,000,000	
9-Janv08	0	0	800,000	
17-Jan-08	0	375,000	0	
18-Jan-08	0	200,000	0	
22-Jan-08	0	60,000	0	
l-Feb-08	0	265,000	0	
6-Feb-08	0	98,000	50,000	
12-Feb-08	0	250,000	400,000	
14-Feb-08	0	37,000	0	
15-Feb-08	0	400,000	0	
3-Mar-08	0	0	500,000	
10-Mar-08	0	0	200,000	
13-Mar-08	0	0	200,000	
19-Mar-08	0	200,000	0	
20-Mar-08	0	753,000	0	
26-Mar-08	0	49,500	0	
31-Mar-08	0	400,000	0	
3-Apr-08	0	100,000	0	
8-Apr-08	0	0	1,000,000	
10-Apr-08	0	216,000	216,000	
14-Apr-08	0	1500	0	
17-Apr-08	0	5000	1,000,000	
18-Apr-08	0	75,000	0	
■ Grar^ .TotalSlfe			i^ ^^366t000?	

^ig^ CDC k^:rgicg		
BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	740	Nil
April 30,2008		450,000

Sub-Account JS Global 5264		
Account Reconciliation of JS Investment Account in Second Review Period		
Period:	Shares	Balance

Opening CDC Balance As on Nov 29,2007	2,000,000	
Opening CFS Balance As on Nov 29.20D7		W.000
Total/Open/		
Total Buy During the Period	650,000	
		\$(1,550,000)
	2,000,000	

Closing CDC Bal As on April 22,2008	(450,000)	
Total Sell During the Period	(4,200,000)	
Closing CFS Balance April 22,2008		

CDC balance after adjusting buying/selling during the period		
Adjustment in CDC		0
Off Market purchase on 17-12-07		

		asm
Opening CDC Balance As on Nov 29,2007		
Opening CFS Balance As on Nov 29,2007	-	
Total Buy During the Period	2,619,000	
Total Sell During the Period	(1,950,000)	
		^11^669.000,'
	.v ~ir tf'''OE	
Closing CDC Bal As on April 22,2008	(669,000)	
Closing CFS Balance April 22,2008		
	5Tt Tjnnjc" v. ?^"lywajr	i»e9W:.
Difference in acisInffBala^ ^iBiBtSiMM^HMB^ ^ ^a^g^fBpr	t' ~v ,1m IU m.	



Details of Alleged Violations Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.14.1.

, ■ , \$j ^ ^ ^ ^ ^ ^ ^ ^ S J . L ' p R p ^ T R A P K ; V y T H ; £ n j E ^ R G S J J ^ _ 1 p y i p i R S ^ ^			
■ : ^ ^ f ^ f i C l l e r r t ^ ^ M ®	» T o t a r , B u y ^		^ Q u a r r t ^ S o l d W
J S I N V E S T M E N T S	3,485,000	Crosby Dragon Fund	590,500
J S I N V E S T M E N T S		Saad Saeed Faruqui	307,000
J S I N V E S T M E N T S		Rashid Siddiqui	99,000
J S I N V E S T M E N T S		Muhammad Asif Mendha	69,000
J S I N V E S T M E N T S		Js Capital Protected Fund ii	66,000
J S I N V E S T M E N T S		JS Bank Limited	54,000
J S I N V E S T M E N T S		Saba	50,000
Total	^ £ 3 i 485,000		
3 w t h G r o u p ;			

J S I N V E S T M E N T S C R O S S T R A D E S W I T H O T H E R G R O U P M E M B E R S			
F O R T H E P E R I O D N O V E M B E R 29 , 2007 T O A P R I L 22 , 2008			
Client	Total Sell	Counter Client	Quantity Bought
J S I N V E S T M E N T S	6,366,000	Jahangir Siddiqui Securities Services	800,000
J S I N V E S T M E N T S		Muhammad Asif Mendha	
J S I N V E S T M E N T S		Muhammad Riaz	
J S I N V E S T M E N T S		Shazia	
J S I N V E S T M E N T S		Saba	66,000
J S I N V E S T M E N T S		JS Income Fund	
			259,000
			215,500
			209,000
			65,000
J S I N V E S T M E N T S		Aalia Shiraz	
			25,000
			11,639,500
25.75% Cross Trades with Group members			

6.15 JS INCOME FUND Formerly UTP INCOME FUND:

TRADING DETAILS OF JS INCOME FUND DURING REVIEW PERIOD 2:

<i>mmzmm</i>		<i>mmmm</i>		
25-Mar-08		2,000,000	-	
26-Mar-08	-	54,500	-	
2-Apr-08	-	23,000	12,000	
3-Apr-08	-	12,500	76,000	
4-Apr-08	-	10,000	-	
8-Apr-08	-	522,500	-	
9-Apr-08	-	183,500	-	
10-Apr-08		84,500	.	
11-Apr-08	-	22,500	-	
14-Apr-08	*	12,000	12,000	
22-Apr-08	-	-	24,000	
	MM			

CDC Information:

BALANCE AS AT	CDC Trustee VC#	BALANCE
November 29,2007		Nil
April 22,2008		2,796,000

: iW^iAccountReconqfliationlqfJSIncome/ta^		
Opening CDC Balance As on Nov 29,2007	-	
Opening CFS Balance As on Nov 29,2007	-	
Total Buy During the Period	2,925,000	
Total Sell During the Period	(124,000)	
thdp&lod^MMSm	—	
Less Shares received against the purchase of 84,500 on 10-04-2008	(5,000)	
Balance after, CDC ^ustrwht^i ; ;*m ■ •: v -v?«.		i@52/796tp00;
Closing CDC Bal As on April 22,2008	(2,796,000)	
Closing CFS Balance April 22,2008	-	
Total Closing Balance appearing as at April 22£008 - •':. ' • r '»	&-j. . >■ '	
Difference in Closing Balance ^- ■ ; ■ . ■ ' ■ I i # ? ?] *		

Details of Alleged Violations
 Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.15.1.

cross trades www.QTEPSP.org/EMIERp smmm			
	IPERIO D;NOVEM BE1^^2001j@^^UI2^2pQ^^		
		^fe^untefe^ient^!#^:	
JS INCOME FUND	2,925,000	Muhammad Riaz	1,974,500
JS INCOME FUND		Crosby Dragon Fund	107,500
JS INCOME FUND		Saad Saeed Faruqui	68,000
mmmm		RUJMJ,MIWBQnBBIRBBai	nMUHI
JS INCOME FUND		Muhammad Asif Mendha	50,000
JS INCOME FUND		Saba	36,000
JS INCOME FUND		JS Bank Limited	24,000
Total^^^@« ^ ^ f	#^g g2,925,000		
•&■ i 170.40% Cross Trades with			l^raup^berej

CROSS TRADES .R.GROUP.MEM B ERSrf^@®ijjf			
-PERIOD NOVEMBER 007JP ARpiK22t2Q08 i- ntm			
JS INCOME FUND	124,000	Muhammad Riaz	10,000
JS INCOME FUND		Saba	5000
	^@iil24,000Sg «		«15,000.i
Si^^^»^%1^S .i.12.ip%VC^irrad^'w^,proUp@Mberai			

6.16 JS CAPITAL PROTECTED FUND:
TRADING DETAILS OF JS CAPITAL PROTECTED FUND DURING REVIEW PERIOD 2:

	SiPl&ffltigw			
&-Jan-08		0	250,000	
&-Jan-08	0	0	49,500	
&-Jan-08	0	0	200,500	
&-Jan-08	0	0	46,500	
Grandfotaliii				

CDC Information:

BALANCE AS AT	CDC Trustee A/C#	BALANCE
November 29,2007		546,500
April 22,2008		Nil

	Tiil1111	
Opening CDC Balance As on Nov 29,2007	546,500	
Opening CFS Balance As on Nov 29,2007	-	
		11^^5^5001
Total Buy During the Period	-	
Total Sell During the Period	(546,500)	
Closing CDC Bal As on April 22,2008		
Closing CFS Balance April 22,2008	-	
		Li

Details of Alleged Violations Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.16.1.

		mMKSSI'
	ittwrotafeselfciiiii®	iPQuantity-Baught^
JS CAPITAL PROTECTED FUND	546,500	Jahangir Siddiqui Securities Services Limited 546,500
■ Total;		mmmBmmmtos

6.17 JS CAPITAL PROTECTED FUND II:

TRADING DETAILS OF JS CAPITAL PROTECTED FUND II DURING REVIEW PERIOD 2:

DATE	Opening CF	UEADYIMAP	TRAISCATJOINS	
9-Jan-08	0	0	3,656,500	
21-Jan-08		114,000	0	
31-Mar-08	0	0	614,000	
Grand Total		.114,000 %	4^270^500	

CDC Information:

BALANCE AS AT	CDC Trustee A/C#	BALANCE
November 29,2007		3,656,500
April 22,2008		Nil

Opening CDC Balance As on Nov 29,2007	3,656,500	
Opening CFS Balance As on Nov 29,2007	-	
7bta/5ppen^ij^riii^iMtiNbyi29t2OT		
Total Buy During the Period	114,D00	
Total Sell During the Period	(4,270,500)	
		^KW^OQiPQO)
	#iPSfP8tSi®	
Purchase Bill entry appearing in CDS DN 23-01-2008 But same was missing in KATS data	500,000	
	.s. k-	
Closing CDC Bal As on April 22,2D08	-	
Closing CFS Balance April 22,2008	-	

Details of Alleged Violations

Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.17.1.

			B. &
JS Capital Protected Fund II	4,270,500	Jahangir Siddiqui Securities Services Limited	3,328,000
JS Capital Protected Fund II		Saad Saeed Faruqi	32,500
55-15		. <>... !iU.i»*v a+... -, ra«g.s-j-gf	

6.18 JS GROWTH FUND Formerly UTP GROWTH FUND :

)n the following mentioned trading details of JS Growth fund, the transactions carried out on January 11, 2008 and February 01, 2008 were not found in the CDS of the Fund. Same were verified from the trustees of JS Growth Fund i.e CDC Trustee and MCFSL, both the trustees informed that no such transactions have been notified to them by the Fund.

TRADING DETAILS OF JS GROWTH FUND FOR REVIEW PERIOD 2:				
	Opening CFS..			Closing
				liffcnfceet
		Htwrfnm	-	
28-Jan-08	-	300,000	-	
KEWsaa	-		-	
14-Mar-08	-	500,000	500,000	
GrandTptal#			«fQo;OT»i	

CDC Information:

„ ■Cr.W". i'CE C1 nformation of JS.Capitai		
BALANCE AS AT	CDC Trustee VC#	BALANCE
November 29,2007		3,656,500
April 22,2D08		Nil

Details of Alleged Violations Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.18.1.

JS GF CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
Client	Total Buy	Counter Party	Quantity Sold
JS GROWTH FUND	500,000	M. Riaz	56,500
Total	500,000		181,500
36.30% Cross Trades with Group members			

Payment Information:

During the course of investigation we examined the financial records of JS Global and it was found that all the payments pertaining to JS Investments and the funds managed under the AMC have been made through JS Bank, an associate company of JSCL along with JS Investment Limited

Overall Conclusion:

Based on the observations noted above it is evident that JS Investments and all the funds managed under this AMC, acting in concert with other members of the ‘Group’, was involved in price manipulation of Azgard Nine Limited during the review periods. Some of its funds have also been found violating the securities iaw by doing wash sales. By indulging in above referred manipulative and prohibitive activities the subject AMC has violated the law and regulation such as:

- Securities and Exchange Ordinance 1969, 5-17(e), (ii), (Hi), (iv), (v)



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Saad Saeed Farooai (SSF):

6.19

Mr. Saad has been the top buyer and seller among all the Group members and a client of JS Global Capital. Saad Farooqui is a close associate of JS Group. He is currently running a company 'Optimus Limited' in partnership with JS Private Equity Fund I LLC, owning 48% and 52% shares respectively. Mr. Jehangir Siddiqui and Mr. Stephen Smith are on Company's board along with Saad Saeed Farooqui.

Both Ali Jehangir Siddiqui and Saad Farooqui are the graduates of Cornell University. Saad Farooqui has managed Mustang Securities Services (Pvt) Ltd, his family owned security services company. Mr. Ali Jehangir Siddiqui has been one of the Directors of the same company since December 1999 to December 2002.

He has also served on the board of directors of several listed and unlisted companies of JS Group:

- Jahangir Siddiqui Investment Bank Limited (Listed)
- Dadex Eternit (Listed)
- » AJ-Abbas Industries (Un-listed)
- » Cinepax Limited (Un-listed)

Trading Pattern in Ready & CFS Market in Review Period 1:

SSF has been the most aggressive buyer amongst the Group members; he bought 27 million shares during the first review period (April 02 to July 13, 2007).

During the period under review, daily trading pattern in ready & CFS market of SSF is as follows:

DATE	Opening CFS	READY MARKET TRANSACTIONS		Closing CFS
	Finanee	BUY QTY	SALE QTY	Finanee
20070402	4,670,500			4,670,500
20070418	4,670,500	964,500	-	5,635,000
20070419	5,635,000	1,185,000	-	6,820,000
20070420	6,820,000	3,021,000	-	9,841,000
20070423	9,841,000	45,500	-	9,886,500
20070426	9,886,500	2,094,000	-	11,980,500
20070427	11,980,500	2,681,000	-	14,661,500
20070430	14,661,500	430,500	.	15,092,000
20070502		2,131,500	-	

	ib,uy^,uuu			l/7^d,bU0
20070503	17,223,500	5,494,000		22,717,500
20070504	22,717,500	1,475,500	-	24,193,000
20070507	24,193,000	907,500	-	25,100,500
20070508	25,100,500	1,268,500	-	26,369,000
20070509	26,369,000	703,500		27,072,500
20070518	27,072,500		2,406,500	19,666,000
20070521	19,666,000		2,666,000	17,000,000
20070522	17,000,000	900,000		17,900,000
20070524	17,900,000	579,000		18,479,000
20070525	18,479,000	-	4,000,000	14,479,000
20070529	14,479,000		506,000	14,479,000
20070530	14,479,000		479,000	14,000,000
20070601	14,000,000	106,500		14,106,500
20070604	14,106,500	71,500		14,178,000
20070605	14,178,000	1,000,000		15,178,000
20070606	15,178,000	700,000		15,878,000
20070607	15,878,000	657,000		16,535,000
20070613	16,535,000		80,000	15,235,000
20070625	15,235,000			13,635,000
20070626	13,635,000			12,700,000
20070629	12,700,000	943,500	1,000,000	11,641,000
20070703	11,641,000			11,316,000
20070704	11,316,000	-	4,695,500	7,116,000
20070709	7,116,000	-	500,000	6,616,000
20070710	6,616,000		1,000	6,615,000
20070711	6,615,000	.	283,500	6,500,000
20070712	6,500,000	-	1,000,000	5,500,000
20070713	5,500,000			5,500,000
Grand Total		27,359,500	17,617,500	

C TO C (OUT OF KATS TRANSACTIONS)

	^LXLIENT	-/iIQty		FLB	SMI
30/04/2007	Saad Farooqi	5,000,000	29		
30/04/2007	JS Bank			5,000,000	29
2/5/2007	JS Bank	5,000,000	29		
2/5/2007	Saad Farooqi			5,000,000	29

CDC Information:

CDC Information of Saad Saeed Farooqui		
BALANCE AS AT	CDCtyC#	BALANCE
April 02,2007	Sub A/C #1441	80,000
July 18,2007		8,992,500

: Accibuht Reconciliation of FAccount		
Opening CDC Balance As on April 2nd,07	80,000	
Opening CFS Balance As on April 2nd,07	4,670,500	
' Total Opening Balance as at April 2nd,07 3^	SRiHitIPfii	
Total Buy During the Period	27,359,500	
Total Sell During the Period	(17,617,500)	
CDC balance after adjusting buying/selling during the period*!	aii"—	
Closing CDC Bal As on July 18, 2007	(8,992,500)	
Closing CFS Balance July 13 2007	(5,500,000)	
Total Closing Balance appearing as at July 18,2007 .		^pt ^2iSog^
Difference In Closing Balances - 'HA^'• A # ^ \$. 1		

Trading Pattern in Ready & CFS Market in Review Period 2:

	lfjnance£ \$?	■>BUYQTY^lr		^RnanceefK
20071129	-	.	600,000	-
20071130		1,949,000	147,500	1,000,000
20071203	600,000		375,000	625,000
20071204	625,000	-	585,500	625,000
20071205	625,000	.	1,560,000	625,000

20071206	625,000	365,000	-	990,000
20071207	990,000	2,485,000	-	3,475,000
20071210	3,475,000	199,500	99,500	3,575,000
20071211	3,575,000	1,605,000	-	5,180,000
20071212	5,180,000	1,083,000	-	6,263,000
20071213	6,263,000	500,000	-	6,763,000
20071214	6,763,000	500,000	-	7,263,000
20071217	7,263,000	500,000	-	7,763,000
20071218	7,763,000	1,124,000	.	7,817,500
20071219	7,817,500	-	63,000	7,817,500
20080103	7,627,500	-	1,200,000	7,627,500
20080104	7,627,500	-	150,000	7,627,500
20080108	7,627,500		631,500	7,127,500
20080116	5,291,000		25,000	7,077,500
20080117	6,451,500	-	651,000	6,451,500
20080118	-	-	6,451,500	-
20080307	-	2,500,000	-	2,090,500
20080310	2,090,500	1,301,000	155,000	3,391,500
20080311	3,391,500	554,000	-	3,945,500
20080312	3,945,500	1,660,000	-	5,152,500
20080313	5,152,500	840,000	650,000	5,792,500
20080327	4,242,500	-	1,550,000	4,242,500
20080331	3,737,500	1,000,000	-	4,737,500
20080401	4,737,500	1,740,000	-	6,387,500
20080403	5,083,000	100,000	-	5,083,000
20080407	4,033,000	-	800,000	4,033,000
20080408	1,145,000	-	2,433,000	1,145,000
20080409	973,500	-	155,000	973,500
20080410	-	-	1,092,500	-
20080414	-	-	59,500	-
20080415				

	-	-	^Ub,SUU	-
20080416	.	-	1,643,500	
Grand Total-		20,005,500	0mmmm IS21,284;500*	

CDC Information:

CDC Information of Saad Saeed Farooqui'		
BALANCE AS AT	CDC A/C#	BALANCE
November 29,2007	Sub A/C #1441	2.229,000
April 22,2008		950,000

scond Review Penoc		
		HSBalance*'i'
Opening CDC Balance As on Nov 29,2007	2,229,000	
Opening CFS Balance As on Nov 29,2007		
Total Openirig'Balance'as at-Ncrv 29,2007 ' / 's ?.		
Total Buy During the Period	20,005,500	
Total Sell During the Period	(21,284,500)	
CDC bal ahreafte radjusti ng'luyi ng/sel 1 ingd uri rigthe		
Closing CDC Bal As on April 22.200B	(950,ODD)	
Closing CFS Balance April 22,2008	0	
Total^bsingBatan^Ip^H^i i ^April52,2008^^^j^		:11(950,000)

Payment Details:

During the investigation it was revealed that SSF maintains his bank account with MCB Clifton Branch. Following are the details of his bank account opening form:

Bank Name:	MCB Clifton	Branch OD74-01-01-0073412 12-03-2008 <u>Sher Nabi Khan</u> Nil
A/C number:	Shahrukh	S.Fraooqui (Brother)
Opening		

The foil owing the review Date: single payment was issued by Saad Farooqui' to JS Global during both periods:
Introduced

1 . Payments made bySaad Farooqui to JS Global toV *. : ' -c.:			
Date	V-' A' /c ■ N • Amount (Rs.)	■■ Cross chMk with SBP^«ti'	H In SSF; &nk iA£SDOunt \ ■
25/D7/07	7,500,000	Appearing in his account	7,500,000

Nominee/Next to Kin:

Following are the payments have been issued to SSF by JS Global including both the review periods:

Payments to Saad Farooqui			
Date	Amount	Remarks	Amount
26/06/2007	2,500,000	Received in A/C # 73412 MCB	2,500,000
09/08/2007	54,000,000		Not appearing
27/08/2007	17,500,000		17,500,000
28/08/2007	8,900,000		8,900,000
29/08/2007	61,000,000		61,000,000
15/11/2007	90,000,000	Payments found in /VC # 73412 MCB on date and amount matching criteria	90,000,000
16/11/2007	29,700,000		29,700,000
18/04/2008	143,000,000		143,000,000
13/05/2008	90,000,000		90,000,000

Extending the probe of SSF bank account, we found following substantial payments received by SSF from JS Global and immediately transferred to other beneficiaries' accounts.

Issuer	Beneficiary	Date	Instrument	Amount
JS Global Capital	Saad Farooqui	15-11-2007	9794477	90,000,000
Saad Farooqui	Crosby Securities Pakistan	16-11-2007	93502222	90,000,000
Crosby Securities Pakistan	Saad Farooqui	23-04-2008	04677738	91,742,054
Saad Farooqui	Ali Jehangir Siddiqui	24-04-2008	2819466	90,000,000
JS Global Capital	Saad Farooqui	13-05-2008	4526701	90,000,000
Saad Farooqui	Ali Jehangir Siddiqui	14-05-2008	2819480	90,000,000
JS Global Capital	Saad Farooqui	19-04-2008	5307303	143,000,000
Saad Farooqui	CASH	28-04-2008	2819475	23,000,000
Saad Farooqui	CASH	28-04-2008	2819474	60,000,000
Saad Farooqui	CASH	29-04-2008	2819473	60,000,000

The supporting documents of the above mentioned Information have been provided in Annexure 6.19 A

Review Period 2
Details of Alleged Violations
Cross Trades

Following two tables reveals that SSF was involved in Cross trades with other group member. The trading details of SSF showed that he bought 27,359,500 shares and sold 17,617,500 during the first review period He bought 19.03% of the above mentioned shares from the group members and sold 68.43% of the above mentioned shares to the group members. The detail of cross trading for first review period has been provided in Annexure 6.19.1.

Review Period 1:

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Saad Saeed Farooqui'	27,359,500	Begum Aftab Kari	2,653,500
Saad Saeed Farooqui'		UTP	1,050,000
Saad Saeed Farooqui'		Zehra	700,000
Saad Saeed Farooqui'		Jahangir Siddiqui Bank Ltd.	285,000
Saad Saeed Farooqui'		Amna Humayun Sheikh	232,000
Saad Saeed Farooqui'		Mehboob AH Kaiyar	207,500
Saad Saeed Farooqui'		Crosby Dragon Fund	104,500
Saad Saeed Farooqui'		Rubina Malkani	33,000
Saad Saeed Farooqui'		Shazia	14,500
.....		- , ' ' ' t&iQHISR;	

Saad Saeed Farooqui'	17.617,500	Zehra	5,813,500
Saad Saeed Farooqui'		Muhammad Iqbal	5,165,000
Saad Saeed Farooqui'		Crosby Dragon Fund	500,000
Saad Saeed Farooqui'		Shazia	290,500
Saad Saeed Farooqui'		Jahangir Siddiqui Bank Ltd.	197,500
Saad Saeed Farooqui'		JS SONS	40,000
Saad Saeed Farooqui'		Amna Humayun Sheikh	25,000
Saad Saeed Farooqui'		M Ibrahim	25,000
...:/			

Similarly, the trading details of SSF during the second review period showed that he bought 20,005,500 shares and sold 21,284,500 shares. He bought 43.19% of the above mentioned shares from the group members and sold 61.57% shares to the group members. Please note that the below mentioned table exhibits the daily consolidated position of cross trades executed between SSF & other group members. The detail of cross trading for second review period has been provided in [Annexure 6.19.2](#).

	MSSEiCgaSSitBABE		MBS
Saad Saeed Farooqui'	20,005,500	Aziz Fidahusein & Company (Private) Limited	1,972,500
Saad Saeed Farooqui'		Crosby Dragon Fund	1,855,500
Saad Saeed Farooqui'		Zehra	1,821,000
Saad Saeed Farooqui'		Muhammad Asif Mendha	1,182,000
Saad Saeed Farooqui'		Saba	697,000
Saad Saeed Farooqui'		Begum Aftab Kari	602,000
Saad Saeed Farooqui'		Zaibunisa	263,500
Saad Saeed Farooqui'		Rubina Malkani	52,500
Saad Saeed Farooqui'		Shazia Sadiq	161,000
Saad Saeed Farooqui'		JS Capital Protected Fund2	32,500
		£	

li\$fiS	gas		
Saad Saeed Farooqui'	21,284,500	Crosby Dragon Fund	4,522,000
Saad Saeed Farooqui'		Muhammad Asif Mendha	3,676,000
Saad Saeed Farooqui'		Shazia	974,000
Saad Saeed Farooqui'		Saba	871,000
Saad Saeed Farooqui'		Muhammad Riaz	819,000
Saad Saeed Farooqui'		Jahangir Siddiqui Securities Services Limited	777,500
Saad Saeed Farooqui'		Muhammad Ijaz	536,500
Saad Saeed Farooqui'		Zehra	325,000
Saad Saeed Farooqui'		Js Investments Limited	307,000
Saad Saeed Farooqui'		Rubina Malkani	193,500
Saad Saeed Farooqui'		Js Income Fund	68,000
Saad Saeed Farooqui'		Aziz Fida Hussein	36,000

Review Period 2

Overall Conclusion:

Based on the above it is evident that Saad Saeed Farooqui', acting in concert with other members of the 'Group', was actually involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, he has violated the law and regulation such as:

- Secur/t/es and Exchange Ordinance 1969, S-17(e), (ii), (v)

6.20 Shazia Sadiq (SS):

Shazia Sadiq w/o Muhammad Sadiq is a JS Global Capital client and the wife of low level JS employee. SS has been found primarily with other members of the Group in a premeditated manner. The account opening form revealed that Mr. Muhammad Sadiq her husband is the nominee of her account. Shazia Sadiq w/o Muhammad Sadiq is the second biggest trader within the Group.

Trading Pattern in Ready & CFS Market in Review Period 1:

DATE	Opening CFS	READY MARKET		Closing CFS
	Finanee v' -;	BUY QTY	SALE QTY '	Finanee
20070419	.	1,572,500	-	1,572,500 -
20070420	1,572,500	2,500,000	277,500	3,795,000
20070423	3,795,000	-	732,000	3,063,000
20070424	3,063,000	-	115,500	2,947,500
20070425	2,947,500	-	445,500	2,502,000
20070426	2,502,000	646,500	-	3,148,500
20070430	3,148,500	581,000	225,000	3,504,500
20070503	3,504,500	1,271,500	161,500	4,614,500
20070504	4,614,500	280,000	-	4,894,b00
20070507	4,894,500	1,179,000	1,500,000	4,573,500
20070508	4,573,500	-	123,500	4,445,500
20070509	4,445,500	325,000	575,000	4,195,500
20070510	4,195,500	.	699,000	3,495,000
20070516	3,495,000		801,000	2,572,500
20070517	2,572,500		2,600,000	-
20070522		700,000		700,000
20070524	700,000		700,000	-
20070525		-	100,000	
20070626		485,000	485,000	
20070628		140,000	140,000	
20070704		287,500	-	287,500
20070705		.	287,500	

				-
20070711		1,000,000	-	1,000,000
20070712	1,000,000	223,000	-	1,223,000
20070713	1,223,000	98,500	421,500	900,000
Grand Total		11,289,500	10,389,500	

CDC Information:

CDC Information of Shazia Sadiq		
BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	Sub A/C #3777	Nil
July 18,2007		Nil

; A(XX3Ujn)?ea?nciiiatipgp^^pMiy^		
... . V:' .Per'lod'V-:-H*^		
Opening CDC Balance As on April 2nd,07		
Opening CFS Balance As on April 2nd,07	-	
Teftal		«sii'
Total Buy Ouring the Period	11,289,500	
Total Sell Ouring the Period	(10,389,500)	
CDCbalanbe afteraditfeti ng ib uvlng/seili ngd u linilthe *		
Ba apge should: be appearedprTUul^S^tjoS^^^^^p		
Closing CDC Bal As on July 18,2007		
Closing CFS Balance July 13 2007	(900,000)	
^T^I^osi^Baialce-ip ■<&		
Different* iiiCleing Balance		

Trading Pattern in Ready & CFS Market in Review Period 2:

	tSIS^:		IRKEE^ltat	fsjamif
	'-Financee	fili®	mmw't	■a®*
29-Feb-08		1,942,000	340,000	1,448,500
3-Mar-08	1,448,500	1,759,000	161,000	3,173,500
4-Mar-08	2,964,500		207,000	2,966,500
5-Mar-08	1,338,500		1,627,500	1,338,500
7-Mar-08	1,338,500	333,500		1,672,000
10-Mar-08	1,672,000	663,000	111,500	2,223,000
11-Mar-08	-		2,175,500	-
12-Mar-08		850,000	75,000	775,000

13-Mar-08	-		850,000	-
16-Apr-08	-	1,403,500	603,500	800,000
17-Apr-08	-		800,000	-
GrandJcteLlti*		'^*63&tOQQi	m951*>0tt!	

CDC Information:

CDC Information of Shazia Sadiq		
BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	Sub A/C # 3777	Nil
April 22,2008		Nil

Account Reconciliation of SS Account In Second Review Period			
Period	Start	End	Balance
Opening CDC Balance As on Nov			
As on Nov 29,2007			
Total Opening Balance	»	V	44, wJ'-v l!i;'. 'U \r. 51,000

Total Buy During the Period (6,951,000)

Total Sell During the Period

CDC balance after

Closing CDC Bal As on April 22,2006
Closing CFS Balance April 22,2006

Total Closing Balance appearing as on April 22,2008		
Difference in Closing Balance		

Payment Information:

During the course of investigation we examined the financial records of the brokerage house with respect to SS and the following payments were issued by JS Global to Shazia Sadiq:

17/05/07	5,000,000	Received	5,000,000
19/05/07	5,000,000	Received	5,000,000
24/05/07	60,678	Received	60,678
9/6/2007	815,678	Received	815,678
12/7/2007	2,000,000	Received	2,000,000
18/07/2007	5,000,000	Received	5,000,000
13.09.2007	2,500,000	Received	2,500,000
19.10.2007	10,000,000	Received	10,000,000
02.11.2007	18,000,000	Received	18,000,000

We independently verified these records from SBP and obtained the Bank Account Statement of SS, which revealed that Ms.Shazia Sadiq has joint account with her husband Mr.Sadiq Patni (An employee in Jehangir Siddiaui & Co).

During the investigation we also obtained the bank account statement of Mr.Sadiq with Faisal Bank which reveals that the person getting salary of Rs.15,969 per month from Jahangir Siddiqui Company Ltd.

Please note that all the above mentioned amounts deposited in Shazia Sadiq Bank Account were withdrawn in cash on the very next day of the deposit. The following table reveals the cash transactions carried out by Mr.Sadiq Patni:

, 714 ■•"H i (it -3l j'Li ai '5U >!' 1? 1 '!■* ^				
1	Sadiq Patni	Sadiq Patni	17.05.2007	2,000,000
2	Sadiq Patni	Sadiq Patni	21.05.2007	2,000,000
3	i Sadiq Patni	Sadiq Patni	17.07.2007	1,000,000
i	miM			
5	Sadiq Patni	Cash collected by Mr.Abdul Hakeem Khan	25.07.2007	1,450,000
6	Sadiq Patni	Sadiq Patni	15.08.2007	2,200,000
7	Sadiq Patni	Sadiq Patni	13.09.2007	2,490,000
8	Sadiq Patni	Sadiq Patni	20.10.2007	9,800,000
§				BBSiH&IKiH

Comparing the Tale 2 with Table 1 clearly shows the payment received from the brokerage house i.e JS Global Capital was withdrawn very next day in form of cash. It is pertinent to note that the two payments mentioned on S.no 4 & 9 in the above table were deposited in JSCL officials’ account, namely Syed Nizam Shah (Director JSCL) and Munaf Ibrahim (CEO JSCL).

'j: i SIU							
i	JS Global Capital	M.Sadiq ¹	Cross	02.11.2007	2543786	18,000,000 !	MCB
2	M.Sadiq	M.Sadiq	Cash	03.11.2007	2260009	18,000,000	MCB
3	M.Sadiq	M.Sadiq	Cash	05.11.2007	1094265	18,000,000	Faysal Bank
4	M.Sadiq	Munaf Ibrahim	Cash	05.11.2007		12,000,000	Faysal Bank

The above mentioned table provides a money trail where the funds have been transferred from JS Global to Munaf Ibrahim account using the different accoounts of Shazia and M.Sadiq.

Starting from the information provided on S.no 1, where JS Global issued a cheque to M.Sadiq.

Info on S.no 2 shows the withdrawal of cash by M.Sadiq from his MCB Account and deposited the same in his other account with Faysal Bank.

He again withdrawn cash from his Faysal Bank account and partial amount of Rs.12 million deposited in Munaf Ibrahim account with the same bank and partial was again withdrawn inform of cash. Reference S. no 3 & 4.

Stretching the review period for the said client payment records, it was found that the following two crossed Cheque have also been issued to Mr.Munaf Ibrahim, the CEO of Jehangir Siddiqui Company Limited.

JS Global Capital	Shazia Sadiq	10.01.2007	4206946	18,771,317	MCB
SHAZIA	Munaf Ibrahim	11.01.2007	00106302	8,000,000	Habib Metropolitan Bank , Stock Exchange Branch
SHAZIA	Munaf Ibrahim	11.01.2007	00106301	10,000,000	

Similarly another payment bank transfer of Rs.5.4 million was made from SS Bank Account, to Aziz Fidahussein & Co (Brokerage House) on account of Mublna Amanullah (Alleged sister of Mr. Munaf Ibrahim). The payment transfer form was signed by Mr. Sadiq F*atni, husband and joint account holder of Ms. Shazia Sadiq.

The few of the above mentioned financial links between the Shazia Sadiq Husband and Munaf Ibrahim indicated strong evidence that Shazia Sadiq account was being operated through Munaf Ibrahim and her husband, who is an employee of Munaf Ibrahim. Since M.Sadiq is a salaried person, getting only Rs. 15,969 per month, it is prima-facie impossible for him to carry out the aforementioned millions of rupees transactions.

Moreover the movement of funds in form of cash, especially substantial amount of payments indicates the very likely fact of creating a long trail of funds transfer to hide the ultimate beneficiary.

This very similar pattern of withdrawing substantial amount of cash can be observed through out second review period as well. The following table reveals the major transactions of Shazia Sadiq and Muhammad Sadiq bank account for the period December 2007 to June 2008, wherein the major source of incoming funds are JS Global Capital and the transfer of these substantial funds in form of cash:

Date	Issued by -	Beneficiary	Instrument No.	Amount
27.12.2007	JS Global	Shazia Sadiq	2543877	1,500,000
10.01.2008	JS Global	Shazia Sadiq	2543827	3,000,000
11.01.2008	Shazia Sadiq	Cash Withdrawal	226013	4,500,000
11.01.2008	Cash Received	Shazia Sadiq	2773432	1,000,000
14.01.2008	JS Global	Shazia Sadiq	643859	3,000,000
14.01.2008	Shazia Sadiq	Cash Withdrawal	226014	5,400,000
18.01.2008	JS Global	Shazia Sadiq	2543865	4,500,000
18.01.2008	Shazia Sadiq	Cash Withdrawal	226015	4,000,000
29.01.2008	JS Global	Shazia Sadiq	1256624	1,450,000
30.01.2008	Shazia Sadiq	JS Global	226018	2,000,000
07.04.2008	JS Global	Shazia Sadiq	8327329	6,872,297
08.04.2008	Shazia Sadiq	Cash Withdrawal	809878	6,658,000
26.04.2008	JS Global	Shazia Sadiq	8327409	2,000,000
26.04.2008	Shazia Sadiq	Shazia Sadiq	809881	1,800,000
10.05.2008	JS Global	Shazia Sadiq	2543723	7,500,000
10.05.2008	Shazia Sadiq	Shazia Sadiq	809882	4,350,000
14.05.2008	JS Global	Shazia Sadiq	2543724	4,748,700
14.05.2008	Shazia Sadiq	Cash Withdrawal	809883	4,800,000
16.05.2008	Shazia Sadiq	Cash Withdrawal	809884	3,400,000
20.05.2008	JS Global	Shazia Sadiq	8327537	12,311,545
23.05.2008	Shazia Sadiq	Cash Withdrawal	809885	12,261,900
06.06.2008	JS Global	Shazia Sadiq	3469332	2,262,894
06.06.2008	Shazia Sadiq	Shazia Sadiq	809887	2,250,000
09.06.2008	JS Global	Shazia Sadiq	3469334	27,629,106
09.06.2008	Shazia Sadiq	Shazia Sadiq	809888	20,300,000
24.06.2008	Shazia Sadiq	Cash Withdrawal	809891	7,300,000

The supporting documents of the above mentioned information have been provided in Annexure 6.20 A

Details of Alleged Violations

Cross Trades

The trading activity of SS showed that she bought 11,289,500 shares and sold 10,389,500 during the review period. She bought 41.36% of the above mentioned shares from the group members and sold 62.51% of the above mentioned shares to the group members. The detail for first review period has been provided in Annexure 6.20.1.

Review Period 1			
" , mmt			
Shazia Sadiq	11,289,500	UTP AGGRESSIVE ALLOCATION FUND	1,973,500
Shazia Sadiq		Mehboob Ali Kalyar	1,099,000
Shazia Sadiq		Zehra	944,500
Shazia Sadiq		Saad Saeed Farooqui'	290,500
Shazia Sadiq		Begum Aftab Qari	207,500
Shazia Sadiq		Rubina Maikani	100,000
Shazia Sadiq		Crosby Dragon Fund	32,500
Shazia Sadiq		Jahangir Siddiqui Investment Bank Ltd.	22,000
Total .		sSgiSSMEgBBBSft	

1	^SHAZIAjSADIOC I		
Shazia Sadiq	10,389,500	Zehra	3,563,000
Shazia Sadiq		Mehboob Ali Kalyar	1,482,500
Shazia Sadiq		Khalid Rafi	769,500
Shazia Sadiq		JSCL	325,000
Shazia Sadiq		Begum Aftab Qari	264,000
Shazia Sadiq		Crosby Dragon Fund	75,000
Shazia Sadiq		Saad Saeed Farooqui'	14,500
Shazia Sadiq		Rubina Malkani	1000
Total 7			*S^&£afe\$^,494,500 e^wUtGioupjMmbers,

Specific of Cross Trades:

SS main trading was mainly attributed to Mehboob Ali Kaiyar another client of JS Global Capital. Their Cross trading includes 1.1 million shares buy and 1.4 million shares sale on May 07, 2007. The total trading volume on May 07, 2007 was 5.9 million shares thus these two JS clients generated average 20% volume just trading between them. The following table reveals the details of their Cross trading:

	•iTKil • v					
Shazia Sadiq	20070507	1019360019	31	SELL	482,500	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1019400047	31	SELL	17,500	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	! 1019400048	31	SELL	482,500	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1019440023	31	SELL	17,500	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1019440024	31	SELL	482,500	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1343510039	31.2	BUY	420,000	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1343550002	31.2	BUY	80,000	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1343550003	31.2	BUY	420,000	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1343590026	31.2	BUY	80,000	MEHBOOB ALI KALYAR
Shazia Sadiq	20070507	1343590027	31.2	BUY	99,000	MEHBOOB AU KALYAR

MSCIRCU LAR*TRADE.ON: MM		mmn200mE £RiYi	
Time Track	Client	Buy	Sell
10.19 A.M	SS		1.4B2.500
10.19 A.M	MK	1,482,500	
13.43 P.M	SS	1,099,000	
13.43 P.M	MK		1,099,000

Review Period 2

Similarly, the trading activity of SS during the second review period showed that she bought 6,951,000 shares and sold 6,951,000 shares. In percentage terms, she bought 42.74% of the above mentioned shares from the group members and sold 45.78% shares to the group members. The detail for second review period has been provided in Annexure 6.20.2

		 T14i i."
Shazia Sadiq	6,951,000	MUHAMMAD ASIF MENDHA	1,690,000
Shazia Sadiq		SAAD SAEED FARUQUI	974,000
Shazia Sadiq		JS INVESTMENTS LIMITED	209,000
Shazia Sadiq		BEAGUM AFTAB KARI	87,000
Shazia Sadiq		JS Bank Ltd	11,000
^ III»»	iiiiiii		

i"	wmmmm	SamH'OffIERi.GRQUBMEMBaSIII	Wkm
Shazia Sadiq	6,951,000	MUHAMMAD ASIF MENDHA	2,225,500
Shazia Sadiq		CROSBY DRAGON FUND	654,000
Shazia Sadiq		SAAD SAEED FARUQUI	161,000
Shazia Sadiq		MUHAMMAD RIAZ	112,500
Shazia Sadiq		Aalia Shiraz	14,500
Shazia Sadiq		MUHAMMAD IJAZ	14,500
Shazia Sadiq		Aziz Fida Hussein	500

Overall Conclusion:

Based on the observations noted above it is evident that Shazia Sadiq name was being used by her husband. Her trading account and bank account used by husband and the persons who employed her husband, so the real accused in this case is SS husband Sadiq Patni and Munaf Ibrahim. Who acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, she has violated the law and regulation such as:

6.21 Mehboob Ali Kalvar (MAK):

Mehboob Ali Kalyar s/o Mahmood Kalyar is a JS Global client and has been identified as a lower level employee of Jahangir Siddiqui & Company Limited. He serves as Personal Assistant (PA) to Jahangir Siddiqui. The trading detail of MAK revealed that he has bought 1,531,500 shares and sold 2,616,500 during our review period.

Trading Pattern in Ready & CFS Market

During the period under review, daily trading pattern in ready & CFS market of MHK is as:

14 Securities and Exchange Ordinance 1969, S-17(e), (ii), (v)

DATE	Opening CFS	READY MARKET TRANSACTIONS		Closing CFS
	Finanee	BUY QTY	SALE QTY	Finanee
20070507	-	1,531,500	1,531,500	-
20070608	-		15,000	-
20070613	-		1,070,000	-
Grand Total		1,531,500	2,616,500	

CDC Information:

CDC Information of Mehboob Ali Kalyar		
BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	Sub VC # 922	185,710
July 18,2007		170,710

		HbSSI
Opening CDC Balance As on April 2nd,07	i 185,710	
Opening CFS Balance As on April 2nd,07	~	
;7ota^b^nn^Ba^apc(^s'ati4^i^07^^S^I ■		
Total Buy During the Period	1,531,500	
Total Sell During the Period	(2,616,500)	
CDCbalanceafteratitiStingbuyfrig/seltipgjiuring		
:v." . "' j;... >' X': X.. X ^ ' . " . . .v "I		
Delivery against Sell on 13-06-2DD7, settled through shares received from Mashooq Kalyar	1,070,000	
^J^nceisfaiu/d be'aCT^recl^^^'^2Q07 \$i S ^ ^^		■ *^?17(Km
Closing CDC Bal As on July 18, 2007	(17D,71D)	
Closing CFS Balance July 13 2007 j	-	
Total Closing Balance appearing asat July 18,2007. . '		
Difference'rhXIostngBalarice		

Payment Information:

During the investigation it was found that MAK operates his bank accounts in more than six (6) banks i.e MyBank, MCB, JS Bank, Habib Bank, Standard Chartered Bank and Faysal Bank.

As it has been mentioned earlier that MAK has been an employee of JSCL, therefore during the investigation we also obtained the bank account statement of MAK with Faisal Bank, where the salaries account of JSCL employees have been maintained including MAK. The bank account reveals that MAK getting salary of Rs.22,437 per month from Jahangir Siddiqui & Company Ltd till the month of May 2007.

Bank Name:

A/C number:

Opening

Date:

Introduced

By:

Joint tyC Holder:

Nominee/Next to Kin:

Following are the bank account information pertaining to Mybank, which was mainly used in trading of ANL shares:

My Bank-Stock Exchange Branch

01-010-127-7

D6-05-2006

M .Iqbal Rangila (Apparently an employee of JS Bank)

Nil

Arshat Mehboob Kaiyar (Wife)

During the course of investigation, we examined the financial records of JS Global and the following payments were traced:

Mehboob Kaiyar	JS GLOBAL	16/04/07	200,000	4310338	Appearing in Mybank Statement
JS Global	Mehboob Kaiyar	12/05/07	389,135	87441	Appearing in MCB Statement
JS Global	Mehboob Kaiyar	25/05/07	33,330	87783	Appearing in Mybank Statement
JS Global	Mehboob Kaiyar	19/06/07	1,313,566	120014	Appearing in Mybank Statement
JS Global	Mehboob Kaiyar	26/07/07	1,139,081	123007	Appearing in Mybank Statement

Further we independently verified the above mentioned payments from SBP and obtained the Bank Account statements of the said client for both Mybank and MCB. The Bank statement of Mybank account showed huge debit balance of Rs.8.9 million, on enquiry the concerned bank informed that the said facility has been given against the shares listed on Karachi Stock Exchange. Following are the shares against which the Running Finance facility has been given to Mr. Kaiyar, it is important to mention here that all these shares pertain to JS Group companies:

AABS AL-Abbas Sugar
ANL Azgard Nine Limited
EFUL EFU Insurance Limited
JSCL Jehangir Siddiqui and Company Limited
JSGCL Jehangtr Siddiqui Global Capital Limited

We also selected few major transactions from his Mybank account statement and verified the issuer/beneficiary details from SBP. The following table reveals that the major funds received in his account made by Mr.Ali Jehangir Siddiqui, Director ANL and JSCL.

Issuer	Beneficiary	Date	Instrument#	Amount	Info Received from SBP
Mehboob Kaiyar	Malik Mohd Yousuf	29.08.2007	04312877	1,475,000	Malik Yousuf is in Private service.
Mehboob Kaiyar	Nawab & Sons	14.06.2007	04312858	1,375,000	Pay order has been re-deposited into the account of Mr.Mehboob Kaiyar.
Mehboob Kaiyar	Mr.Shabir Ahmed Mehar	26.08.2007	04312875	1,450,000	The beneficiary Bank Account Opening form shows the business address as Roma Car Show Room
Ali Jehangir Siddiqui	Mehboob Kaiyar	02.05.2007	03283640	1,152,833	Payment received from Ali Jahangir Siddiqui . Cheque pertains to account no 166-6 of the issuer
Ali Jehangir Siddiqui	Mehboob Kaiyar	07.06.07	14252147	1,118,933	Payment received from Ali Jahangir Siddiqui . Account Opening Form does not provide any info other than accountholder name.
Ali Jehangir Siddiqui	Mehboob Kaiyar	21.07.07	03625348	1,413,718	Payment received from Ali Jahangir Siddiqui .The account opening form provided by HBL shows that Ali Jehangir account was introduced by Mehboob Ali Kaiyar.
JS Global Capital	Mehboob Kaiyar	03.08.2007	04018342	7,632,686	It was also found from S8P info that Mehboob Kaiyar also operates his account in JS Bank .

The copies of supporting documents have been provided in Annexure 6.21 A

Details of Alleged Violations

Cross Trades

Following table reveals the break up of MHK cross trading with other group members and showed 96.80% Buy and 77.97% Sale respectively. The detail of cross trading has been provided in Annexure 6.21.1.

M HK CROSS TRADES WITH OTHER GROUP MEMBERS , FOR THE PERIOD APRIL 02 TO JULY 13, 2007 - ^			
Client	MHK Total Sale	Counter Client .	Quantity Bought
Mehboob Ali Kaiyar	2,616,500	Shazia Sadiq	1,099,000
Mehboob Ali Kaiyar		JS Securities Services	428,500
Mehboob Ali Kaiyar		Syed Nizam Shah	309,000
Mehboob Ali Kaiyar		Saad Saeed Farooqui'	207,500
Total	2,616.500	■ v.- ■ ^	- 2,044,000
-V 7T.97% Cross Trades with Group members			

Overall Conclusion:

Based on the observations noted above it is evident that Mr. Mehboob Ali Kaiyar, acting in concert with other members of the 'Group*', was involved in price manipulation of Azgard Nine Limited during the review period. He has also been found violating the securities law by short selling. By indulging in above referred manipulative and prohibitive activities has violated the law and regulation such as:

- Securities and Exchange Ordinance 1969, S-17(e), (ii) (v)

6.22 Mashooa Ati Kalvar (MSK):

Mashooq Ali Kalyar s/o Mehmood Kalyar is a JS Global client and brother of Mehboob Ali Kalyar, who has been in employment with JS Group.

Trading Pattern in Ready & CFS Market

During the period under review, daily trading pattern in ready & CFS market of MSK is as:

DATE	Opening CFS	READY MARKET		Closing CFS
	Finanee	BUY QTY	SALE QTY	Finanee
20070427		2,000	-	2,000
20070503	2,000		2,000	
20070510		5,000	-	5,000
20070518	5,000		5,000	
20070612		1,070,000		1,070,000
20070613	1,070,000			
20070704		5,000		5,000
20070705	5,000		5,000	5,000
20070712	5,000	5,000	-	5,000
20070713	5,000			5,000
Grand Total		1,087,000	12,000	

CDC Information:

CDC Information of Mashooq Ali Kalyar		
BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	Sub A/C #8677	1,600
July 18,2007		1600

Account Reconciliation of MAK Account in First Review.Period		ggijgjf
		SKf
Opening CDC Balance As on April 2nd,07	1,600	
Opening CFS Balance As on April 2nd,07	-	
Total Opening07^		immm
Total Buy During the Period	1,087,000	
Total Sell Duringthe Period	(12,000)	
COC balance after adjusting buying/selling during the period	.>•'f ¹ . iv?' i ifi pii 3 -	
Shares released from CFS and settled against Mehboob Kalyar Sell on 13-06-2007	1,070,000	
Balance should be appeared ori July 18 2007 '		
Closing CDC Bal As on July 18, 2007	(1,600)	
Closing CFS Balance July 13 2007	(5,000)	
Total Closing Balance appearIngas aJuly1S,2007 iSM\		mmooy.
Differericeln Closing		iisiiiite

Payment Details:

During the course of investigation we examined the financial records of the JS Global and it was found that no payment has been made during the review period either from the client or the brokerage house to settle the outstanding.

Details of Alleged Violations

Cross Trades

MSK bought 1,087,000 shares during our review period and sold 12,000 shares. During the period his trading mainly remained between 2000-5000 shares except on June 12, 2007, when he bought 1,070,000 shares 31% of total day trade, completely financed (CFS) by JSGCL He bought these shares in small lots through out the day and created false impression of buying in the shares of ANL, the price was closed on an upper lock that day. It is important to note that, the detail obtained from JS Global did not show this huge transaction made by MSK. Copy of Financial Ledger is attached in Annexure 6.8

Following table reveals the cross trades of MSK with other group members. The detail of these transactions has been provided in Annexure 6.22.1.

Client		JS Investment Bank	
Mashooq Ali Kalvar	1,087,000	Khalid Rafi	57,000
Total	1,087,000		5000
570% Cross trades With Group members			

Overall Conclusion:

Based on the observations noted above it is evident that that MSK account utilized illegally by the brokerage house to book trades and no payment has been made or received by him and shares never went to his CDC account Mashooq Ali Kaiyar, acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, he has violated the law and regulation such as:

Securities and Exchange Ordinance 1969, S-17(e), (ii), (v)

6.23 Zaibunnisa (ZB):

Mrs. Zaibunnisa has also been identified as client of JS Global Capital. She is 50 years old 'House Wife' living in Meethadar Karachi. During the second review period she bought 3.1 million shares and sold 2.4 million, out of which substantial 58% were bought from the Group members while 45% were sold to Group members.

The brokerage house account opening form reveals that ZB maintains a single account, her husband Noor Muhammad as nominee, with JS Global, while has joint bank account with Ahmed Abdul Razzak in JS Bank ,who also lives in the same vicinity of Meethadar.

Mr. Ahmed Abdul Razzak has also signed JS Global account opening form of ZB as witness and 'Introducer'. It is learnt during the investigation that Mr. Ahmed has been working with JS Group officials especially with Mr.Munaf Ibrahim CEO, Jehangir Siddiqui & Co Limited in the capacity of a 'Dealer', who fetch the clients for the brokerage house and makes commission out of their trading proceeds.

It has been covered in the Financial Section of ZB that all the money transactions were carried out through Mr.Ahmed in form of CASH transactions, leaving fewer clues where the money transferred from the Joint account of ZB and Ahmed, received in form of ANL and other scrips proceeds from JS Global Capital.

TRADING DETAILS OF ZAIBUNISA FOR REVIEW PERIOD 2:

	Opening	CE& j	i ^ a- gREADY-MAR KETIgliSiMSii ffiuvsomraMI	
m				
2D080115			2DD,D00	200,000
20080116	200,000		2DD,DDD	-
20080327	-	1,066,500	866,500	200,000
20080328	2D0,DD0	481,000	481,ODD	200,000
20080331	200,000	2,237,500	237,500	2,200,000
20080401	650,000	1,000,000	2,200,000	650,000
2008D4D2	50,000	400,000	500,000	450,000
20080403	450,000	.	9DD,0DD	
Grand Total - S.' '-/		1 #5,3^,000\	^5i385^)il	

CDC Information:

BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	14246	10,000
April 22,2008		Nil

Opening CDC Balance As on Nov 29,2007	10,000	NME
Opening CFS Balance As on Nov 29,2007	-	
Total Buy During the Period	5,385,000	
Total Sell During the Period	(5,385,000)	
Adi iia^jnr^rf^frfSsiX; Transfer to Sanober on 27-02-2008 * +^ . u lb i v,*—rr-vff-A	wmmmmim-
Closing CDC Bal As on April 22,2008	-	
Closing CFS Balance April 22,200B	-	
Total		

Payment information:

As it has stated earlier that ZB maintains her bank account with JS Bank jointly with Ahmed s/o A.Razzak. It is important to mention here that HBL Account # 8121-2, Rampat Road Achi Kabar, Karachi has been given in client bank details of JS Global account opening form instead of JS Bank.

While not a single transaction has been carried out through HBL bank account instead all transactions have taken place in JS Bank , which itself is an accused in ANL price manipulation and an associate company of JS Group.

It will also be important to mention here that it took almost three month to the Commission to get the bank account details from JS Bank, further not a single fund transfer was signed by ZB. During the period of almost one year all funds received in the joint account of ZB and Ahmed, were withdrawn by Ahmed Abdul Razzak and all in from of Cash.

Following are the bank account details:

JS Bank Name: Bank, Shaheen Complex Branch

A/C number: 0000109644

24-11- Opening 2007

not Date: clear from Bank account opening form Ahmed s/o A.Razzak Nil

Introduced

By: During the course of investigation we examined the financial records of JSGCL and following payments both from the brokerage house and the client were observed.

We Joint tyC Holder: independently verified these records from Bank account statement of the ZB as acquired from the SBP.

Nominee/Next to Kin:

PAYMENTS ISSUED BY ZB TO JS GLOBAL CAPITAL						
Sl. No.	Client Name	From	Date	Payment Order No.	Amount	Remarks
1	Zaibunnisa	JS Global Capital	17-12-2007	0105960	2,500,000	Found
2	Zaibunnisa	JS Global Capital	25-01-2008	0105963	4,465,774	Found
3	Zaibunnisa	JS Global Capital	02-02-2008	Cash Deposited	4,000,000	Cash not with drawn from the account
4	Zaibunnisa	JS Global Capital	04-03-2008	0105966	8,919,859	Found

"Sift? \ - J i*: i ^ iffiv						
1	JS Global Capital	Zaibunnisa	01-12-2007	N/A	620,218	Found
2	JS Global Capital	Zaibunnisa	13-12-2007	N/A	75,000	Found
3	JS Global Capital	Zaibunnisa	21-01-2008	0445717	4,465,774	Found

It was also observed that a payment of Rs. 4,465,774 was made by JS Global to the subject client on January 21 2008 and same payment was returned to JS Global by the client on January 25, 2008.

As it has been stated, that major payments of ZB and Ahmed bank account were either in form of cash transactions or intrabank transfers, we extended the probe of ZB bank account statement and the following payments details were obtained from SBP.

ISSUER : ■ ■ ■ ; ■ ■ ■ - • ■ " ■ ■ ■ ' - . "igffi	jHffg		I^MODBOpp	^INSTRUMENT	, ,AMOUNT J • VI, J. A. / n
JS Global	Zaibunnisa/Ahmed Razzak	23-11-07	Cross	0129660	24,048,00(1
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	26-11-07	Cash	0105951	8,000,000 j
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	27-11-07	Cash	0105952	9,000,00c :
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	27-11-07	Cash	0105953	4,000,000
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	28-11-07	Cash	0105955	2,000,000*
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	29-11-07	Cash	0105956	1,000,000-
JS Global	Zaibunnisa/Ahmed Razzak	01-12-07	Cross	0129717	620,218
Zaibunnisa/Ahmed Razzak	JS Global	14-12-07	Cross	0105960	2,500,000"
JS Global	Zaibunnisa/Ahmed Razzak	21-01-08	Cross	0445717	4,465,774^
Zaibunnisa/Ahmed Razzak	JS Global	22-01-08	Cross	10105963	4,465,77"*
Zaibunnisa/Ahmed Razzak	JS Global	04-03-08	Cross	0105966	8,919,859
Zaibunnisa/Ahmed Razzak	JS Global	24-05-08	Cash	0105976	7,500,00c
Zaibunnisa/Ahmed Razzak	JS Global	24-05-08	Cash	0105973	7,000,000
Zaibunnisa/Ahmed Razzak	JS Global	24-05-08	Cash	0105974	7,000,00P
Zaibunnisa/Ahmed Razzak	JS Globa!	10-06-08	Cross	0105979	12,500,001?
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	19-06-08	Cash	0105981	5,000,000,
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	24-06-08	Cash	0105982	10,000,00^,
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	24-05-08	Cash	0105983	5,000,000 ■

Following table is an extract of the above mentioned table, showing a bulk payment of Rs.24 million received from JS Global and subsequently withdrawn in form of cash indicates a potential form of breaking links of money trait:

.-■ ■ ■US2UER#*gffi«	^ ^ ^MBENEFICIARY:-^, ■* ■			JNSTRUMENT	yOUNTj
' ' j• ■ *'VCr ■	-*A.f ; y,"				
JS Global	Zaibunnisa/Ahmed Razzak	23-11-07	Cross	0129660	24^048,OGJ
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	26-11-07	Cash	0105951	8,000,000
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	27-11-07	Cash	0105952	9,000,00(J
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	27-11-07	Cash	0105953	4,000,00(T
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	28-11-07	Cash	0105955	2,000,00««
Zaibunnisa/Ahmed Razzak	Zaibunnisa/Ahmed Razzak	29-11-07	Cash	0105956	i,ooo,ooJ

Following are the payments which are inter bank transfers and the details of issuer/beneficiary have been asked *from* the concerned banks through SBP:

ISSUER ,			-MOQEÖš» lff	iINSmUMEHT #	igAMOUNT: ^.
FDM Capital Securities	Abdul Basit	03-03-08	Cross	24789578	9,220,459
JS Global	Zaibunn isa/Ahmed Razzak	24-05-08	Cross	0447917	11,055,400
JS Global	Zaibunnisa/Ahmed Razzak	24-05-08	Cross	0447918	18,261,508
JS Global	Zaibunnisa/Ahmed Razzak	05-06-08	Cross	0448097	13,929,604
JS Global	Zaibunnisa/Ahmed Razzak	18-06-08	Cross	0448303	31,229,600
JS Global	Zaibunnisa/Ahmed Razzak	27-06-08	Cross	0105984	5,000,000

The first payment mentioned in the above table was issued from FDM Capital to Mr.Abdul Basit but deposited in account of Ahmed Razzak in JS Bank. On obtaining the details from FDM (brokerage house) the Commission was informed that the said payment was made to Abdul Basit, who is son of FDM Director Operations Muhammad Munir. The cheque was deposited in Ahrtied account as proceeds of trading carried out through FDM capital using Abdul Basit account. The brokerage house further explained the Commission that Ahmed Abdul Razzak being a Dealer in the capital market, made an arrangement with FDM to do some trading on his behalf; therefore the payment was deposited in his account.

Keeping in view the aforementioned information, it has been concluded that Mrs. Zaibunnisa account was being operated through Ahmed Abdul Razzak. The conspicuous association of Ahmed Razzak with JS Group as dealer and anonymous financial transactions lead the Commission to the conclusion that ZB name was just used on face of trading account, while all the proceeds belong to Ahmed Razzak and his trading associates.

The supporting documents of the above mentioned information have been provided in Annexure 6.22 A
Details of Alleged Violations Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.22.1.

^mmm		
ZAIBUNNISA	5,385,000	CROSBY DRAGON FUND 2,017,500
ZAIBUNNISA		SABA 856,500
ZAIBUNNISA		MUHAMMAD ASIF MENDHA 156,500
ZAIBUNNISA		RUBINA MALKANI 100,000
'Jqta!.g ^ ^	■ ■ ' ■. -2k S ? ? ^ ji&?,**jj?	

	«Sj	WMM	tmmmmm
ZAIBUNNISA	5,385,000	CROSBY DRAGON FUND	1,415,000
ZAIBUNNISA I		SABA	756,000
ZAIBUNNISA J		SAAD SAEED FARUQUI	263,500
Total		WMM 7.1	igg

Overall Conclusion:

Based on the observations noted above it is evident that ZB name was being used by Ahmed Abdul Razzak and his associates. Who acting in concert with other members of the ‘Group’, was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, he has violated the law and regulation such as:

6.24 Muhammad Ibrahim (MU:

Muhammad Ibrahim s/o Wali Muhammad is a JS Global client. MI’s trading detail reveals that he has traded 1.1 million shares during the first review period and almost 90% of his trading was cross with other group members.

Trading Pattern in Ready & CFS Market

During the period under review, daily trading pattern in ready & CFS market of MI is as:

DATE	Opening CFS Finanee	READY MARKET TRANSACTIONS		Closing CFS Finanee
		BUY QTY	SALE QTY	
20070410		5,000	-	
20070411		-	5,000	
20070521		25,000	25,000	
20070522		25,000	-	
20070523		-	25,000	
20070620		500	-	
20070622		10,000	-	
20070625		1,000,000	1,000,000	
20070629		-	10,500	
20070711		50,000	25,000	25,000
20070712	25,000		25,000	
Grand Total		1,115,500	1,115,500	

CDC Information:

CDC information of Muhammad ibrahim		
BALANCE AS AT	CDC/VC#	BALANCE
April 02.2007	Sub A/C# 8131	Nil
July 18,2 DO 7		Nil

Opening CDC Balance As on April 2nd,07	0	
Opening CFS Balance As on April 2nd,07	0	
Total nimmnBmm		
Total Buy During the Period	1,115,500	
Total Sell During the Period	(1,115,500)	
Closing CDC Bal As on July 18, 2007	1	
Closing CFS Balance July 13 2007		

Payment Details:

During the course of investigation we examined the financial records of the JS Global with respect to MI and it was found that no payment has been made during the first review period either from the client or the brokerage house to settle the daily transactions.

Details of Alleged Violations

Cross Trades

The trading details of MI showed that he bought 1,115,500 shares and sold 1,115,500 during the review period. In percentage terms, she bought 91.98% of the above mentioned shares from the group members and sold 92.34% of the above mentioned shares to the group members. The details of cross trades have been provided in Annexure 6.23.1.

Following tables indicate that the cross trading of MI with other group members, mainly with Shaikh family.

MUHAMMAD IBRAHIM CROSS,TRADES WITH OTHERGROypMEM BERS			
• . ^ffORTHEPEIUQbli^BOS^JUUA «			
Client	MI Total Buy •	:7 '': Counter '-Client • . '	■ Quanta Sold
M.Ibrahim	1,115,500	Begum Aftab Kari	1,000,000
M.Ibrahim		Saad Farooqui'	25,000
M.Ibrahim		Zehra	1000
Total	1,115,500 - ■/ ,.	v . -V-	1,026,000
... 91.98% Cross Trades with Group members			

MUHAMMAD IBRAHIM CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD APRIL 02 TO JULY 13, 2007			
Client	MI Total Sale	Counter-Client	Quantity Bought
M.Ibrahim	1,115,500	Amna Shaikh	1,000,000
M.Ibrahim		Zehra	25,000
M.Ibrahim		Rubina Malkani	5000
Total	1,115,500		1,030,000
92.34% Cross Trades with Group members			

WASH TRADE

The following table indicates that MI has bought and sold substantial amount of ANL shares within few minutes with out any major change in buying and selling rates. These economically un-viable transactions corroborate the fact that MI has facilitated to carry out the wash trade among Sheikh Family.

DATE	TIME	TYPE	PRICE	Volume	Cross Client
20070625	1113300040	MI Buy	43.15	500,000	BEAGUM AFTAB KARI SELL
20070625	1113520027	MI Buy	43.2	500,000	BEAGUM AFTAB KARI SELL
20070625	1114480023	MI Sell	43.2	500,000	AMNA HUMAYUN SHAIKH BUY
20070625	1115020007	MI Sell	43.2	500,000	AMNA HUMAYUN SHAIKH BUY

Overall Conclusion:

Based on the observations noted above it is prima facie evident that M.Ibrahim trading account has been used to facilitate the wash trades among the Shaikh family members thus violating the securities law by indirectly conducting wash sales. By indulging in above referred manipulative and prohibitive activities he has violated the law and regulation such as:

6.25 Crosbv Dragon Fund (CDF):

Crosby Dragon Fund is an open end fund managed by Crosby Assets Management Pakistan. CDF link with JS group has described in earlier section (5.4.12) of the report.

CDF has been working through various brokerage houses along with JSGCL **Trading Pattern in Ready & CFS Market:**

in Review Period 1:

CDF has been working through various brokerage houses including JSGCL The brokerage house wise break up of First Review trading has been provided in the following table:

Brokerage House	Buy Qty v	Sale Qty	.Buy % w.r.t	s Sate % w.r.t total
BMA Capital Management	200,000		2.79%	
First Capital Equities		89,500		1.60%
FDM Capital Securities	1,738,000	1,250,500	24.29%	22.29%
Global Securities Pakistan	1,275,000		17.82%	
Taurus Securities	1,228,000	1,525,000	17.16%	27.18%
JS Global Capital	2,715,000	2,745,500	37.94%	48.94%
: .v	7,156,000.	5*10,500,	• 100.00%	;. 100.00%

During the period CDF, the data of trading is provided below:

Date	Opening CFS -rtf	READY MARKET XRANSCATIIONS		dosing CFS
	Financee ;	iBu^Qty	Sale Qty	Financee
20070402				
20070404		-	29,500	
20070409		147,000	43,500	
20070411		-	503,500	
20070418		1,904,500	0	
20070516		45,500	0	
20070523		25,000	0	
20070528		0	1,307,500	
20070529		0	767,500	
20070601		1,072,000	0	
20070604		1,028,000	0	
20070607		D	200,000	
20070612		831,000	0	
^UU/Ubn		2B,UUU	u	
20070622		0	259,000	
20070702		0	83,500	
20070704		0	368,000	
20070705		0	308,500	
20070706		0	8X500	
20070709		0	858,500	
20070710		0	800,000	
20070711		1,500,000	0	
20070712		500,000	0	
Grand Total		7,081,000	5,610,500	

CDC Information:

CDC Information of Crosby Dragon Fund		
BALANCE AS	CDC VC#	BALANCE
April 02,2007	A/C #2128	529,500
July 18,2007		2,000,000

Account		
Opening CDC Balance As on April 2nd,07	529,500	U/M/G
Opening CFS Balance As on April 2nd,07	-	
	¥0 ¹ & *F	
Total Buy Duringthe Period	7,081,000	
Total Sell During the Period	(5,610,500)	
Closing CDC Bal As on July 18, 2007	(2,000,000)	
Closing CFS Balance July 13 2007	-	
Total Closing Balance appearing as atJuly 18,2007m W\$		X(2,000,000)
Difference in Closing Saainoe^^^ X ■>: ' *'''M ■'■■■'		

Trading Pattern in Ready & CFS Market: in Review Period 2:

The brokerage house wise break up of second Review trading has been provided in the following table

Live Securities	350,000	4,918,500	1.82%	25.55%
Fortune Securities	1,400,000		7.27%	
First Capital Equities	1,905,000	1,110,000	9.90%	5.77%
FDM Capital Securities	3,438,000	1,050,000	17.86%	5.45%
Invest Capital Investment Bank	3,087,500	950,000	16.04%	4.93%
Elixir Securities Pakistan	412,500	1,300,000	2.14%	6.75%
Global Securities Pakistan	400,000	655,000	2.08%	3.40%
Invest & Finance Securities		2,000,000		10.39%
KASB Securities		800,000		4.16%
Taurus Securities	2,714,000	4,125,000 1	14.10%	21.43%
Foundation Securities	3,344,500	426,000	17.37%	2.21%
JS Global Capital	1,199,500	1,416,500	6.23%	7.36%
Pearl Securities	1,000,000	501,000	5.19%	2.60%
		g9.252i> 00f	wmasMm&	

During the period CDF, the data of trading is provided below:

<i>mm</i>				
20071205		1,621,500		
20071206		500,000	-	
20071206		1,000,000		
20071210		298,500	-	
20071212		180,000		
20071213		250,000		
20071214		-	650,000	
20071218		16,500	"	
20071227		500,000		
20080102		-	400,000	
20080102	-		416,500	
20080103	-	950,000	-	
20080110		50,000	-	
20080116	-	-	397,000	

20080117	m	—	1,303,000	
20080118	-	1,161,000	1,200,000	
20080121	-	300,000		
20080121		200,000	.	
20080121		100,000		
20080121		100,000	-	
20080121	-	539,000		
20080121	-	100,000	-	
20080206	-		110,000	
20080206	-	14,000	404,000	
20080211	-	-	21,000	
20080212	-	121,000	100,000	
20080213		-	200,000	
20080214	-	-	300,000	
20080215		-	800,000	
20080215	-		500,000	
20080215	-	-	352,000	
20080219		-	348,000	
20080228	-	500,000	-	
20080228	-	1,026,000	26,000	
20080305	-	500,000		
20080307	-		2,418,500	
20080310	-	1,318,500	-	
20080311	-	5,000	5,000	
20080311		687,500		
20080312		412,500		
20080312		500,000	-	
20080314			100,000	
20080318	-	-	112,500	
20080318		-	400,000	
20080320				

	-	-		
20080327		1,000,000	-	
20080328		250,000	-	
20080331		-	2,500,000	
20080401		50,000		
20080401		2,400,000		
20080404			300,000	
20080404		-	200,000	
20080407	-		251,000	
20080408			695,000	
20080408	-	-	250,000	
20080408		-	250,000	
20080408			250,000	
20080409			205,000	
20080410		1,200,000		
20080414		600,000	-i	
20080417		800,000		
20080418	-	-	1,200,000	
20080422	-	-	2,000,000	
	\ :r;>			mm

CDC Information:

CDC Information,of Crosby Dragon Fund %:-		
BALANCE AS AT	CDCA/C#	BALANCE
November 29,2007	A/C # 2128	Nil
April 22,2008		Nil

: Account Reconciliation of Crossby		
Dr	Cr	
Opening CDC Balance As on Nov 29,2007	-	
Opening CFS Balance As on Nov 29,2007	-	
Total Buy During the Period	19,251,000	
Total Sell During the Period	(19,252,000)	
Closing CDC Bal As on April 22,2008	-	
Closing CFS Balance April 22,2008	-	
. Difference fir Closing Balan		• , -v

Payment Information:

Ouring the course of investigation we examined the financial records of the said client and the following payments were issued by JS Global and Crosby Oragon Fund during the First Review Period:

CROSBY DRAGON			
Issued by	Received by	Date	Amount
JS GLOBAL	CROSSBY	9/4/2007	72,602,269
JS GLOBAL	CROSSBY	2/4/2007	4,154,583
JS GLOBAL	CROSSBY	13/07/07	71,315,025
JS GLOBAL	CROSSBY	12/07/07'	82,385,240
JS GLOBAL	CROSSBY	10/7/2007	10,680,565
JS GLOBAL	CROSSBY	9/7/2007	18,442,425
JS GLOBAL	CROSSBY	5/7/2007	41,048,885
CROSSBY	JS GLOBAL	21/06/07	1,215,703
CROSSBY	JS GLOBAL	6/6/2007	45,988,359
JS GLOBAL	CROSSBY	31/05/07	9,854,200
CROSSBY	JS GLOBAL	28/05/07	17,436,893
CROSSBY	JS GLOBAL	21/05/07	81,865,757
CROSSBY	JS GLOBAL	12/4/2007	102,684,341
CROSSBY	JS GLOBAL	23/04/07	41,057,583
JS GLOBAL	CROSSBY	16/04/07	31,026,090

Details of Alleged

Violations Cross Trades

CDF trading pattern has revealed many instances to be involved in cross trading with various Group members. Working through other brokerage houses CDF was trading shares with other Group members specially with ZNA, a client of Aziz Fidahusseini & Co Limited. The trading details of CDF showed that it has bought 7,081,000 shares and sold 5,610,500 during the review period. In percentage terms, it bought 49.66% of the above mentioned shares from the group members and sold 19.53% of the above mentioned shares to the group members. The detail of cross trade for first review period has been provided in Annexure 6.25.1

Review Period 1

7. suMgpgBQjEgl "r- * 1 • /,«. --^alaalFORjTHE .1-			SSuuk^r
Crosby Dragon Fund	7,081,000	Zehra	2,451,500
Crosby Dragon Fund		Saad Farooqui'	500,000
Crosby Dragon Fund		UTP Fund	469,000
Crosby Dragon Fund		Shazia	75,000
Crosby Dragon Fund		JS Bank	21,000

Crosby Dragon Fund	5,610,500	Zehra	344,000
Crosby Dragon Fund		Amna Shaikh	225,000
Crosby Dragon Fund		JS Sons	203,000
Crosby Dragon Fund		M Iqbal	162,000
Crosby Dragon Fund		Saad Farooqui'	104,500
Crosby Dragon Fund		Shazia	32,500
Crosby Dragon Fund		JS Bank	25,000
Total ,A-			1111096^30 0" iWmkTt-t:1 F- ^

Review Period 2

Similarly, the trading details of CDF during the second review period showed that it has bought 19,251,000 shares and sold 19,252,000 shares. In percentage terms, CDF has bought 53.52% of the above mentioned shares from the group members and sold 48.35% shares to the group members. The detail of cross trade for second review period has been provided in Annexure 6.25.2.

		wmmmmmmmmmm	
Client	Biirotai.-		hmmmm
Crosby Dragon Fund	19,251,000	Saad Saeed Faruqui	4,522,ODD
Crosby Dragon Fund		Muhammad Asif Mendha	2,623,000
Crosby Dragon Fund		Zaibunnisa	1,415,000
Crosby Dragon Fund		Zehra	715,000
Crosby Dragon Fund		Shazia	654,ODD
Crosby Dragon Fund		Rashid Siddiqui	121, DDD
Crosby Dragon Fund		Rubina Malkani	1D3.0D0
Crosby Dragon Fund		Aziz Fidahusein & Company (Private) Limited	84,500
Crosby Dragon Fund		Saba	65,DDD
Total .. : ■\$&		Jf*i^3«M;52%-eras^ Trades	fqfj^ &3Q2v^« 'witK^utememIMref

- ■ «a8\$g&gag9SIlfia!BfflB8l!!^^			
	MUSTotatSell ->/y	^BER^29,^2TO^g^^tMj^g8«i	MOdantit^BoughtM
Crosby Dragon Fund	19,252,000	Zaibunnisa	2,017,500
Crosby Dragon Fund		Saad Saeed Faruqui	1,855,500
Crosby Dragon Fund		Rashid Siddiqui	1,529,5DD
Crosby Dragon Fund		Muhammad Asif Mendha	1,100,000
Crosby Dragon Fund		Saba	616,000
Crosby Dragon Fund		Js Investments Limited	59D.500
Crosby Dragon Fund		Zehra	497,500
Crosby Dragon Fund		Jahangir Siddiqui Securities Services Limited	390,500
Crosby Dragon Fund		Muhammad Ijaz	331,000
Crosby Dragon Fund		Muhammad Riaz	147,500
Crosby Dragon Fund		Js Income Fund	107,500
Crosby Dragon Fund		Aziz Fidahusein & Co (Pvt) Ltd	69,500
Crosby Dragon Fund		Aalia Shiraz	47,000
Crosby Dragon Fund		Rubina Malkani	10,500
'9ta' siiliiiiM			mmmma^ioao i

Overall Conclusion:

Based on the observations noted above it is evident that Crosby Dragon Fund, acting in concert with other members of the ‘Group’, was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, CDF has violated the law and regulation such as:

Securities and Exchange Ordinance 1969, S-17(e), (ii),(v)
6.26 Sved Nizam Shah (SNS):

Syed Nizam Shah is the client of JS Global. He is a director of Jahangir Siddiqui and Company Limited and Pakistan International Container Terminal Limited (associates companies of JS Group). Syed Nizam Shah squared off his position during the period and has been found in Cross trading with other JSGCL members.

Trading Pattern in Ready & CFS Market

During the period under review, daily trading pattern in ready & CFS market of SNS is as:

DATE	Opening CFS	REDAY MARKET TRANSCATIONS > >		Closing CFS
	Finanee	BUY QTY	SALE QTY	Finanee
20070524		1,444,500	1,444,500	
20070612		561,000	-	561,000
20070613	561,000	310,000	-	871,000
2D070614	871,000	-	671,000	100,000
20070625	100,000	.	12,000	100,000
20070626	100,000		38,000	100,000
20070629	100,000		50,000	100,000
20070703	100,000		100,000	
Grand Total'		2,315,500	2,315,500	

CDC Information:

CDC information of Syed Nizam Shah		
BALANCE AS AT	CDC A/C#	BALANCE
April 02,2007	A/C # 3116	Nil
July 18,2007		Nil

Opening CDC Balance As on April 2nd,07	-	
Opening CFS Balance As on April 2nd,07	-	
Total Buy During the Period	2,315,500	
Total Sell During the Period	(2,315,500)	
c		•mmm
Closing CDC Bal As on July 18,2007		
Closing CFS Balance July 13 2007	-	
		lilt

Payment Information:

During the course of investigation we examined the financial records of the JS Global and it was found that only one payment was made during the review period:

Issuer	Beneficiary	^Dates^-r	Instrument#	.Og^AmOUqt
JS Global	Syed Nizam Shah	10-07-2007	0121682	7,000,000

Beside the aforementioned payment, a payment transfer of Rs.3,435,000 was also observed from Shazia Sadiq bank account to Nizam Shah Bank account during the first review period.

Details of Alleged Violations

Cross Trades

Following tables shows the SNS cross trading with other group members. His total cross buy is 637,500 shares constituted 28% of his total trading while he sold 1,600,000 shares to the group members constituting 69% of his total selling. The detail of cross trade for first review period has been provided in Annexure 6.26.1.

SNS CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD APRIL 02 TO JULY 13,2007			
Client	SNS Total Buy	Counter-Client	Quantity Sold
Syed Nizam Shah	2,315,500	Mehboob Ali Kaiyar	309,000
Syed Nizam Shah		Amna Shaikh	278,500
Syed Nizam Shah		Jahangir Siddiqui Investment Bank Ltd	50,000
Total	2,315,500		- 637,500
27.53% Cross Trades with Group members			

SNS CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD APRIL 02 TO JULY 13,2007			
Client	SNS Total Sale	Counter-Client	Quantity Bought
Syed Nizam Shah	2,315,500	Zehra	1,200,000
Syed Nizam Shah		JS SONS	400,000
Total	2,315,500	X y V; . . - U i	1,600,000
69.10% Cross Trades with Group members			

Overall Conclusion:

Based on the observations noted above it is evident that Syed Nizam Shah, acting in concert with other members of the ‘Group’, was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, he has violated the law and regulation such as:

6.27 Rubina Malkani (RM1:

Rubina Malkani is JS Global client and the wife of G.M.Malkani, CEO of JS Global Capital (Brokerage House).

Trading Pattern in Ready & CFS Market in Review Period 1:

DATE	Opening CFS	READY MARKET TRANSACTIONS >		-Closing CFS:
	Financier	BUY QTY	• SALE QTY ■;>-	Financier
20070411		120,000	120,000	
20070419			10,000	
20070420		103,500		
20070423		5,000		
20070424		1,000		
20070425		5,000		
20070430		13,000		
20070502		14,500	14,500	
20070504		85,500		
20070508		11,500		
20070509			10,500	
20070510			123,000	
20070511			74,000	
20070518			39,500	
20070521			300,000	
20070524		67,500		
20070531		9,500		
20070601		2,000		
20070605		786,000		
20070613				
20070619		23,000		
20070620		12,000		
20070622			100,000	
20070626			100,000	
20070702			100,000	
20070711			250,000	
20070712			10,000	
20070713			27,500	
Grand Total		1,259,000	1,279,000 '	

CDC Information:

BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	A/C# 807	332,500
July 18,2007		262,500

■ " ^ - -X		
Opening CDC Balance As on April 2nd,07	332,500	
Opening CFS Balance As on April 2nd,07	-	
· Tictraf Opening Bate/K&ais:	jt^^IISSSi t »rV	-^332,500- -
Total Buy Duringthe Period	1,259,000	
Total Sen Duringthe Period	(1,279,000)	
CDC balance after adjusting buying/spiling during the period.... j b...,iL'", :•	<' ' w V - ' v ^	
Shares out on 18-07-2007 not supported by any transaction	(50,000,00)	
	rU'fV '*-"?■>. 'i«	@2fe?,5Qo:iff
Closing CDC Bal As on July 18, 2007	(262,500)	
Closing CFS Balance July 13 2007	-	
Total Closing Bafance appearing as		
Difference in Closing'Balark»^4^:^;,'i^ ^ ^'''^ <*		

Trading Pattern in Ready & CFS Market in Review Period 2:

DATE	Opening CFS	READY MARKET TRANSACTIONS		.Closing CFS
	Financier	BUY QTY	SALE QTY	Financier :
29-Nov-07	-	-	50,000	-
7-Dec-07	-	350,000	-	350,000
10-Dec-07	350,000	-	-	350,000
11-Dec-07	350,000	125,000	-	475,000
12-Dec-07	418,500	-	50,000	425,000
13-Dec-07	425,000	66,500	30,000	461,500
14-Dec-07	425,000	-	36,500	425,000
17-Dec-07	425,000	-	-	425,000
18-Dec-07	4D1,500	-	10,000	415,000
19-Dec-07	415,DDO	-	-	415,000
20-Dec-07	415,000	-	-	415,000
24-Dec-07	399,000	-	15,000	400,OOD
26-Dec-0 7	198,500	-	200,000	200,000
27-Dec-07	200,000	300,000	-	200,000
28-Dec-07	200,000	-	-	200,000
31-Dec-07	200,000	-	300,000	200,000
1-Janv08	200,000	-	-	200,000
2-Jan-08	200,000	-	-	200,000
3-Jan-08	200,000	6,000	-	200,000
4-Jan-08	200,000	-	6,000	200,000
7-Jan-08	200,DOO	-	41,000	200,000
8-Jan-08	200,000	-	-	200,000
9-Jan-08	200,000		159,000	200,000
10-Jan-08	-	-	281,500	-
11-Jan-08		-	11,500	-
14-Jan-08	-	6,500	13,500	-
22 Jan-08	-	12,500	-	-

23-Jan-08	-	93,000	-	-
24-Jan-08	-	159,500	-	-
ffiiMllSecoMI			IHIPIM	
31-Jan-08	-	12,500		
1-Feb-08	-	99,000	-	-
14-Feb-08	-	7,000	-	-
15-Feb-08	-	16,500	-	-
19-Feb-08	-	15,000	-	-
20-Feb-08	-	21,500	-	-
28-Feb-08	-	45,500	-	-
5-Mar-08	-	100,000	-	-
6-Mar-08	-	42,000	-	-
7-Mar-08	-	-	5,500	-
10-Mar-08	-	-	18,500	-
12-Mar-08	-	-	247,500	-
13-Mar-08	-	48,000	228,000	-
17-Mar-08	-	16,500	-	-
18-Mar-08	-	11,000	-	-
19-Mar-08	-	1,500	-	-
25-Mar-08	-	10,000	-	-
27-Mar-08	-	-	211,500	-
16-Apr-08	-	200,000	-	200,000
17rApr-08	200,000	-	-	200,000
18-Apr-08	200,000	67,500	-	261,000
21-Apr-08	261,000	-	-	261,000
22-Apr-08	261,000	82,500	-	343,500

CDC Information:

BALANCE AS AT		
November 29,2007	CDC A/C#	BALANCE
April 18,2008	A/C # 807	50,000
		6,500

	was®*®®	HIbAiance-: ^:
Opening CDC Balance As on Nov 29,2007	50,000	
Opening CFS Balance As on Nov 29,2007	-	
row	mm*sx	
Total Buy During the Period	1,915,000	
Total Sell During the Period	{1,915,00D)	
	1,915,000	#^^50.000,
Off- Market Purchase on 10-01-2008	300,000	
mrn mtwsap* mapimmm ~		I^jfe':®>35b,000
Closing CDC Bal As on April 22,2008	(6,500)	
Closing CFS Balance April 22,2008	(343,500)	
Totd/ *fl -yOOffi	Li. ■■■£** Tp ->z m> ((350,000)	

Payment Information:

It has mentioned earlier that Mrs.Rubina Malkani wife of G.M.Malkani, CEO of JS Global trading has also been found in nexus with other Group members. The financial records retrieved from the brokerage house (JS Global Capital) revealed that *all* the transactions were being carried out in name of G.M Malkani. Following are the Cheques issued and received during the review periods on behalf of Mrs.Rubina Malkani, all entitling G.M.Malkani instead of Mrs.Rubina herself:

-? u'rS' "					
1	JS Global Capital	G.M.Malkani	17-06-08	448271	4,900,000
2	JS Global Capital	G.M.Malkani	23-06-08	448382	15,000,000
3	JS Global Capital	G.M.Malkani	26-06-08	448464	3,717,000
4	G.M.Malkani	JS Global Capital	13-06-08	7761024	23,500,000

The supporting documents of the above mentioned information have been provided in Annexure 6.27 A


Details of Alleged Violations

Cross Trades

The trading details of RM showed that she has bought 1,259,000 shares and sold 1,279,000 during the review period. In percentage terms, she bought 33.32% of the above mentioned shares from the group members and sold 22.32% of the above mentioned shares to the group members. The detail of cross trade for first review period has been provided in Annexure 6.27.1.

Review Period 1

Rubina Malkani	1,259,000	Zehra [413,500
Rubina Malkani		M.Ibrahim 5,000
Rubina Malkani		Shazia Sadiq 1000
• 7" L^_S • ^ « * * * 4 :	• 5 • yw > ,	

mmmvmm		mHER GROUfeM EM BERS - > Q2TO JUI^!-13a^QQ7a^asBjt	
Rubina Malkani	1,279,000	Shazia Sadiq	100,000
Rubina Malkani		JS & Company Limited	55,000
Rubina Malkani		JS Sons	46,500
Rubina Malkani		Zehra	51,000
Rubina Malkani		Saad Farooqui'	33,000
			wa
HMIlr			

Similarly, the trading details of RM during the second review period showed that she has bought 1,915,000 shares

Review Period 2

and sold 1,915,000 shares. In percentage terms, RM bought 50.13% of the above mentioned shares from the group members and sold 26.68% shares to the group members. The detail of cross trade for first review period has been provided in Annexure 6.27.2.

Rubina Malkani	1,915,000	ZEHRA	528,000
Rubina Malkani		MUHAMMAD ASIF MENDHA	200,000
Rubina Malkani		SAAD SAEED FARUQUI	193,500
Rubina Mafkani		SA8A	14,500
Rubina Malkani		CROSBY DRAGON FUND	10,500
Rubina Malkani		RASHID SIDDIQI	9,000
Rubina Malkani		M. Riaz	4,500
Total	ffllfHMafllgftOQpfllftl		

'mmfsmmem	RITHBREB10I1NQ VE		
Rubina Malkani	1,915,000	CROSBY DRAGON FUND	103,000
Rubina Malkani		ZAIBUNNISA	100,000
Rubina Malkani		SABA	87,000
Rubina Malkani		SAAD SAEED FARUQUI	52,500
Rubina Malkani		MUHAMMAD ASIF MENDHA	44,000
Rubina Malkani		JAHANGIR SIDDIQUI SECURITIES SERVICES LTD	41,000
Rubina Malkani		MUHAMMAD RIAZ	40,500
Rubina Malkani		RASHID SIDDIQI	27,500
Rubina Malkani		ZEHRA	10,000
Rubina Malkani		M.ljaz	4,500
Rubina Malkani		Aziz Fida Hussein	1,000
»Total^giBfiii«aM«Bil	tiSjMI'91S'CK^M		
" mmm mM&mmmwSm			

Overall Conclusion:

Based on the observations noted above it is evident that the account of Mrs.Rubina Malkani was used by her husband G.M.Malkani, who was acting in concert with other members of the 'Group', and were involved in price manipulation of Azgard Nine shares during the two review periods. By indulging in above referred manipulative and prohibitive activities G.M.Malkani through RM has violated the law and regulation such as:

6.28 Khalid Rafi (KR):

Khalid Rafi is the JS Giobai client and has been working as Chairman in System innovations (Si3). He has been identified as client of JSGCL and also actively found in cross trading with JS Global clients.

Trading Pattern in Ready & CFS Market

During the period under review, daily trading pattern in ready & CFS market of KR is as:

DATE	Opening CFS	READY MARKET TRANSACTIONS		Closing CFS
	Finanee	BUY QTY	SALE QTY	Finanee
20070402				
20070423		411,500		
20070425		695,000		
20070509			310,500	
20070510			600,000	
20070515		229,000		
20070516		91,000		
20070523		100,000		
20070525		700,000		
20070528			108,500	
20070529			1,207,500	
Grand Total		2,226,500	2,226,500	

CDC Information:

CDC Information of Khalid Rafi		
BALANCE AS AT	CDC VC#	BALANCE
April 02,2007	A/C # 6002	Nil
July 13,2007		Nil

tH!		
Opening CDC Balance As on April 2nd,07	-	
Opening CFS Balance As on April 2nd,07	-	
W6talflpen!ng:^imice^at:ApHl^nd^^^£		
Total Buy During the Period	2,226,500	
Total Sell During the Period	(2,226,500)	
;\$C0£ba/ance afteradjustingibuyIng/sellIng^f^Mi -msm.		
Closing CDC Bal As on July IB, 2007	-	
Closing CFS Balance July 13 2007	-	
Total Closing Balance appearing as atJu^jgp^M		
”Difference inclosing Eteiarice' '\$ ■'•"??	V m	*3\wQ:- .!v

Payment Information:

During the course of investigation we examined the financial records of the said client and it was found that no payment has been made during the review period either from the client or brokerage house to settle the daily transactions. As a result of this practice the large debit balances were appearing in the client account and maximum debit balance upto 56 million was noticed.

Details of Alleged

Violations Cross Trades

Following tables reveal the KR cross trades with other group members. The detail of cross trade for first review

period has been provided in Annexure 6.28.1.
6.29 Rashid Siddiqui (RS):

KHALIDJWF1 CROSS TRADE WITH OTHER GROUP MEMBERS ;			
- ^ FOR THE PERIOD 02 TO JULY 13, 2007 ;			
Client	/. KR Total	Counter-Client	Quantity Bought
Khalid Rafi	2,226,500	Shazia Sadiq	769,500
Khalid Rafi		Zehra	651,000
Total .	2,226,500 .		1,420,500
v. i "Si63.80%Cr^ members			

KHALID RAR CROSS TRADES WITH OTHER GROUP			
FOR THE PERIOD 02 TO JULY 13, 2007 ;			
Client	KRTotai Buy	Counter-Client	Quantity Bought
Khalid Rafi	2,226,500	Amna Shaikh	100,000
Khalid Rafi		Begum Aftab Kari	75,000
		Zehra	45,500
Khalid Rafi		Mashooq Ali Kaiyar	5000
Total .	2,226,500 .		225,500
MMI fili Silfe i. j. > v. £ << ih 10.13% Cross Trades with Group members			

Overall Conclusion:

The person mentioned hereunder, while being an integral part of the Group has not been nominated as an Accused under section 17 e of SEC Ordinance 1969. The reason for not getting him nominated as an Accused under the said law is that the Commission views the role of the aforesaid member of the Group as indirect and secondary in nature. The said Group member, although facilitated the whole scheme of price manipulation and permitted his trading / CDS / bank accounts to be used for the subject purpose, did not directly participate in the scheme. The names and activities of the above-said person is, however, made part of the investigation report, as failing to make a reference to the same would result in an incomplete picture of the scheme designed to manipulate the price of the subject share. The Commission, however, reserves the right to nominate the said persons as Accused at any later stage, if it finds sufficient evidence to support their direct and active involvement in the subject price rigging.

Rashid Siddiqui has also been identified as client of JS Global Capital and retired army personnel. His trading history also shows that his major trading pertains to ANL and JSCL. During the second review period he bought and sold 7.4 million shares, out of which 48% were bought from the Group members while substantial 55% were sold to Group members.

6.29 Rashid S

TRADING DETAILS DF RASHID SIDDIQUI FOR REVIEW PERIOD 2:				
			10NS*1 SS	PUB
10-Janv08	-	252,000	-	190,000
11-Jan-08	190,000	20,000	262,000	-
16-Jan-08		-	10,000	-
22-Jan-08		833,000	379,000	454,000
23-Jan-08	454,000	938,000	1,342,000	-
24-Jan-08	-	840,500	-	840,500
25-Jan-08	840,500	100,500	771,000	170,000
28-Janv08	170,000	313,000	270,000	213,000
29-Janv08	213,000	520,000	733,000	-
4-Feb-08	-	661,500	-	661,500
6-Feb-08	661,500	968,000	-	1,629,500
8-Feb-08	1,629,500	-	297,000	1,232,500
11-Feb-08	1,232,500	46,500	-	1,279,000
12-Feb-08	1,279,000	-	1,329,000	-
13-Feb-08	-	-	100,000	-
15-Feb-08	-	1,307,500		1,057,500
19-Feb-08	1,057,500	303,500	-	1,361,000
27-Feb-08	1,361,000	135,000	1,496,000	-
29-Feb-08	-	163,000	-	157,000
3-Mar-08	157,000	-	463,000	-
•:S^raHdTotal ji'		'Wm^oooM		

CDC Information:

BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	24138	Nil
April 22,2008		Nil

Account Reconciliation of RS Account in Second Review Period		
Period	Share	Balance
Opening CDC Balance As on Nov 29,2007	-	
Opening CFS Balance As on Nov 29,2007	-	
Total Opening Balance as at Nov 29,2007		
Total Buy During the Period	7,402,000	
Total Sell During the Period	(7,452,000)	
CDC balance after adjusting buying/selling during the period		(50,000)
Adjustment In CDC		
	50,000	

Excess shares received as CFS released on 25-01-2008
Closing CDC Bal As on April 22,2008
Closing CFS Balance
Pifferenoe'triQo
April 22,2008
April 22,2008

Payment Information:

Duringthe course of investigation we examined the financial records of JSJCL with respect to Mr. Rashid Siddiqui. He maintains his bank accounts in National Bank, D.H.A branch and HBL Phase 1 Branch.

The following mentioned payments issued and received by RS during the second review period:

Account						
1	Rashid Siddiqui	JS Global Capital	10-01-2008	2710181	15,000,000	Found in NBP

1	JS Global Capital	Rashid Siddiqui	14-02-2008	0446104	2!000!000	Found in HBL Account
2	JS Global Capital	Rashid Siddiqui	28-03-2003	0446738	2,000,000	Found in HBL Account

Details of Alleged Violations Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.25.1.

G v * . .			
	^ptaLBy*		
Rashid Siddiqui	7,402,000	Muhammad Asif Mendha	1,555,000
Rashid Siddiqui		Crosby Dragon Fund	1,529,500
Rashid Siddiqui		Saba	330,500
Rashid Siddiqui		Aziz Fidahussein & CO	72,000
BfisaiBiSHffl			HEketiSti
Rashid Siddiqui		Rubina Malkani	27,500
'Total		-■^402^.*#	i £ ,500,

	^ajgte SeljMg		
Rashid Siddiqui	7,452,000	Muhammad Asif Mendha	3,663,000
Rashid Siddiqui		Saba	150,500
Rashid Siddiqui		Crosby Dragon Fund	121,000
Rashid Siddiqui		Js investments Limited	99,000
Msiwmmm		«iE«	
Rashid Siddiqui		Rubina Malkani	9,000
Total			
SradesMth-Grdiap-			

Overall Conclusion:

The person mentioned hereunder, while being an integral part of the Group has not been nominated as an Accused under section 17 e of SEC Ordinance 1969. The reason for not getting him nominated as an Accused under the said law is that the Commission views the role of the aforesaid member of the Group as indirect and secondary in nature. The said Group member, although facilitated the whole scheme of price manipulation and permitted his trading / CDS / bank accounts to be used for the subject purpose, did not directly participate in the scheme. The names and activities of the above-said person is, however, made part of the investigation report, as failing to make a reference to the same would result in an incomplete picture of the scheme designed to manipulate the price of the subject share. The Commission, however, reserves the right to nominate the said persons as Accused at any later stage, if it finds sufficient evidence to support their direct and active involvement in the subject price rigging.

6.30 Zehra Nazim Aziz (ZNA):

Zehra Nazim Aziz w/o Nazim Aziz is a client of Aziz Fidahussein & Co Limited. She has been identified as the second biggest trader and actively involved in Cross trading with other JS clients during the first review period. Further investigation revealed that ZNA is the wife of one of the Aziz Fidahussein & Co’s Director, Mr.Nazim Aziz who is the son of Mr.Aziz Fidahussein, the CEO of the company.

Trading Pattern in Ready & CFS Market in Review Period 1:

DATE	Opening CFS ; ; - , 0			Closing CFS I'.V
	financee >		;SALEQTYK''	Financee
20070403		25,000		
20070405		2,500	27,500	
20070426		50,000		
20070427			50,000	
20070509		25,000	25,000	
20070611		30,000		
20070514		50,000		
20070515		35,000	100,000	
20070516		2,050,000	50,000	1,500,000
20070517	1,500,000	2,553,000	162,000	3,900,000
20070518	3,900,000	2,151,500	4,060,000	1,800,000
20070521	1,800,000	746,500	2,557,500	-
20070522			689,000	
20070524		2,551,500	1500	2,500,000
20070525	2,500,000	3,024,000	1,074,000	4,284,000
20070528	4,284,000	250,000	241,000	4,284,000
20070530	4,284,000	200,000		4,484,000
20070601	4,484,000		100,000	4,484,000
20070604	4,484,000		1,147,500	3,381,000
20070605	3,381,000		415,000	2,942,500
20070606	2,942,500		5,000	2,942,500
20070607	2,942,500		525,500	2,500,000
20070608	2,500,000		25,000	2,500,000
20070613	2,500,000	1,380,000	864,000	3,016,000
20070614	3,016,000			2,300,000
20070625	2,300,000	72,000	22,000	2,300,000
20070626	2,300,000	860,500	72,500	3,025,000
20070627	3,025,000		54,000	3,025,000
20070628	3,025,000	700,000	5,000	3,025,000
20070702	3,U<IS>,UUU	82,500	1,002,000	2,U2S>,UUU
20070703	2,025,000		644,500	1,025,000
20070704	1,025,000	150,000	718,500	1,025,000
20070705	1,025,000	72,500	85,000	1,025,000
20070706	1,025,000	327,500	799,500	1,125,000
20070709	1,125,000	135,500	50,000	1,125,000
20070710	1,125,000	174,000	96,500	1,125,000
20070711	1,125,000	559,500	3,173,000	-
20070712		200,000	200,000	150,000
20070713	150,000	30,000	193,500	150,000
Grand Total		18,488,000	19,235,500	

CDC Information:

CDC Information of Zehra Nazim Aziz		
BALANCE AS AT	CDCA/C#	BALANCE
Aprii 02,2007	Sub A/C # 9847	Nil
July 13,2007		Nil

; 7 Account Reconciliation of ZNA Account in Fi		
Opening CDC Balance As on Aprii 2nd,07	-	
Opening CFS Balance As on Aprii 2nd,07	-	
		Ilili&iiti
Total Buy During the Period	18,488,000	
Total Sell During the Period	(19,235,500)	
CDC .balance after acy usm^^@^ijing d^^tlw		
Adjustmerrrt in CDS V.		
Delivery not appearing in CDC- Tran Date 16-May-07	(15,000)	
Excess delivery received - Trans Date 18-May-07	17,500	
Excess delivery received - Trans Date 28-May-07	13,500	
Excess delivery made - Tran Date 07-Jun-07	(4,5DD)	
Delivery not appearing in CDC-Tran Date 26-Jun-07	(63,000)	
Excess delivery out - Trans Date 27-June-07	(649,000)	
Excess delivery received - Trans Date 28-Jul-07	717,000	
Delivery not inn in CDC- Tran Date 02-Jun-D7	(8D,500)	
Delivery not out from CDC- Tran Date 4-Jul-D7	287,500	
Excess delivery made - Trans Date 05-Jul-07	(21,000)	
Delivery not out from CDC-Tran Date 06-Jui-07	572,000	
Excess delivery received - Trans Date 10-Jui-07	2D,000	
Delivery not out from CDC- Tran Date II-Jul-07	976,000	
Delivery not out from CDC-Tran Date 13-Jul-07	48,500	
Delivery out not supported by any trans - Settlement Date 05-M-07	(864,500)	
Delivery out not supported by any trans - Settlement Date II-Jul-07	(62,000)	
Delivery not supported by any trans - Settlement Date II-Jul-07	5,000	
Balance should be appeared on July 18		
Closing CDC Bal As on July 18, 2007	-	
Closing CFS Balance July 13 2007	(150,000)	
Total Closing Balance appearing as at July 18,2007		1^350,000)
Differenceiri Closing Balance' 4^1 ^" v - i . 4 i		

Please note that no share was ever transferred into her CDC sub-account despite of buying such large quantities of shares, AFH breached the law by not transferring the shares in her sub account.

Trading Pattern in Ready & CFS Market: in Review Period 2:

DA				ffISI
20071206	-	6,000,000	-	6,000,000
20071207	3,500,000	-	2,500,000	3,500,000
20071210	3,500,000	-	1,100,000	2,400,000
20071211	2,400,000	485,500	1,172,000	1,650,000
20071212	1,650,000	1,509,500	195,000	2,935,000
20071213	2,935,000	312,500	1,395,000	1,833,000
20071214	1,833,000	1,629,500	386,500	3,083,000
20071217	3,083,000	174,000	1,272,500	1,870,000
20071218	1,870,000		505,000	1,470,000
20071219	1,470,000	30,000	30,000	1,470,000
20071226	1,470,000	2,000	432,000	1,470,000
20071227	1,470,000	-	1,470,000	-
20080117	"	525,000	-	500,000
20080118	500,000	633,500	920,500	
Grmmm			wmmmvsm	

CDC Information:

CDC Information of Zehra NazimAziz .		
BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	Sub A/C # 9847	Nil
April 22,2008		Nil

		.^BaranDe*
Opening CDC Balance As on Nov 29,2007	-	
Opening CFS Balance As on Nov 29,2007	-	
Total.Opening Balance as at" Nov 29,2007 ;y., •	il. VV-?	
Total Buy During the Period	11,301,500	
Total Sell Duringthe Period	(11,378,500)	
Excess delivery made on December 18,2007	(60,000)	
Shortage delivery on December 19,2007	(25,000)	
Shares not delivered against sale.	400,000	
Shares not received against purchase	(25,000)	
Shortage on Jan 22,2008	(74,500)	
Delivery out not backed by any transaction	(138,500)	
Balan&ftj\$ ^ ^ . \ ■-„vv	iSHf;. i vlitte. -hM	
Closing CDC Bal As on April 22,2008	-	
Closing CFS Balance April 22,2008	-	
22.2008		
^'Diff ere n ce,i ntciosfr^pa la		IMHM

Payment information:

Zehra w/o Nazim Aziz maintains her account with Bank Al-Habib Stock Exchange branch. During the investigation, the brokerage house (Aziz Fidahussein & Co} provided a power of attorney mentioning that Mr.Irfan Aziz is an authorized person to use the proceedings of Ms.Zehra account. However, following are the basic account information of ZNA:

Bank Name:

VC number: Bank Al-Habib Limited Stock Exchange Branch 071-003644-01-6 14-04-2005 Irfan Aziz

Opening Date: Razia Bano w/o Aziz Fidahussein Aziz Fidahussein

Introduced By:

Joint VC Holder: Duringthe course of investigation we examined the financial records of the ZNA at Aziz Fidahussein & Co. Following are the major payment detail provided by the brokerage house

No mi nee/Next to Kin: (Aziz Fidahussein) and the details verified from the State Bank record:

During the first review period, payment information provided by the brokerage house only contains the cheques issued to Ms. Zehra and no detail of cheques received from Ms. Zehra in terms of Margin/deposit collection was provided. Moreover, most of these payments have been issued in form of cash payments instead of cross Cheques in the name of Ms.Zehra.

Further the verification of these Cash Cheques from SBP provided us the important information that all the cash cheques were subsequently received by Aziz Fidahusein & Co itself, indicating the fact that the ultimate beneficiary of Zahra's trading in the scrip of ANL was Aziz Fidahussein & Co. The following table reveals the detail of such payments including two cheques issued to MrsAnina (mother of Munaf Ibrahim, CEO of JSCL) which were subsequently used to issue pay orders to Aziz Fidahussein & Co for trading purpose in Mrs.Amina account.

S.no:	'■i<'fedSgl				
I	05.07.2007	13,800,000	Khan Haider	Cross Chq	Khan Haider
	rqggfSEgpr: ■v'j'L.V„p; 's'1!~i 'Jil'lii.'Jtj*„.1<1s-				
4	26.05.2007	3,500,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
5	03.07.2007	2,297,165	Zehra Nazim Aziz	Bearer Cheque	Aziz Fidahussein & Co
6	18.05.2007	2,068,220	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
7	03.07.2007	2,000,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
8	03.07.2007	2,000,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
9	08.05.2007	1,821,600	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
10	03.07.2007	1,276,176	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
11	22.06.2007	1,224,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
12	18.06.2007	1,220,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
13	12.06.2007	1,220,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
14	14.06.2007	1,219,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
15	08.06.2007	1,217,400	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
16	13.07.2007	1,037,850	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
17	29.05.2007	1,000,000	Zehra Nazim Aziz	Cash Payment	Aziz Fidahussein & Co
18	04.07.2007	598,000	Zehra Nazim Aziz	Bearer Cheque	Aziz Fidahussein & Co

Extending the First review period, the following table reveals the same pattern where the funds received from Aziz Fidahusein & Co were ultimately transferred to AFH in form of cash.

Further the first instance where the funds received from AFH was first transferred to Munawar Alam Siddiqui, brother of Jehangir Siddiqui and than ultimately reached to AFH.

iiM i	16.08.2007	10,000,000	Aziz Fidahussein & Co .	Zehra/Razia Aziz		
	17.08.2007		^Zehra/Razia Aziz	Munawar Ali Siddiqui		10,000,000
	20.08.2007		TsfonawarAii Siddiqui	Zehra/Razia Aziz		10,000,000
	22.08.2007		Zehra/Razia Aziz		Aziz Fidahussein & Co	10,000,000
				mu		iglo,000,000
2	28.11.2007	20,000,000	Aziz Fidahussein & Co	Zehra/Razia Aziz		
			Zehra/Razia Aziz	Cash Collected by AFH staff	Aziz Fidahussein & Co	20,000,000
						120.009,000
3	04.12.2007	20,000,000	Aziz Fidahussein & Co	Zehra/Razia Aziz		
			Zehra/Razia Aziz	Cash Collected by AFH staff	Aziz Fidahussein & Co	5,000,000
						5,000,000
						5,000,000
						5,000,000
		' - " < ■:				20,000,000
4	10.12.2007	2,350,000	Aziz Fidahussein & Co	Zehra/Razia Aziz		
			Zehra/Razia Aziz	Cash Collected by AFH staff	Aziz Fidahussein & Co	2,345,550
I	:iii\$ISlt				£2,345,550
5	14.12.2007	5,500,000	Aziz Fidahussein & Co	Zehra/Razia Aziz		
			Zehra/Razia Aziz	Cash Collected by AFH staff	Aziz Fidahussein & Co	5,500,000
. > ■, '	' : vs					5,500,000
6	02.01.2008	5,678,236	Aziz Fidahussein & Co	Zehra/Razia Aziz		
			Zehra/Razia Aziz	Cross Cheque	Aziz Fidahussein & Co	5,678,000
			3f. V,;			i5,678,0qc)t
7	10.10.2008	8,691,630	Aziz Fidahussein & Co	Zehra/Razia Aziz		
			Zehra/Razia Aziz		Aziz Fidahussein & Co	8,691,630
		1\ .				18,69.1,630

The supporting documents of the above mentioned information have been provided in Annexure 6.30 A **Details of Alleged Violations Cross Trades**

ZNA has played major role in Cross trading of ANL shares, having huge quantities of cross trades with JSGCL clients. The trading details of ZNA showed that she bought 18,488,000 shares and sold 19,235,500 during the review period. She bought 65.62% of the above mentioned shares from the group members and sold 59.61% of the above mentioned shares to the group members. The details of cross trading for first review period have been provided in Annexure 6.30.1.

First Review Period:

Zehra	18,488,000	Saad Saeed Farooqui'	5,813,500
Zehra		Shazia Sadiq	3,563,000
Zehra		JS Securities Services	1,054,000
Zehra		Syed Nizam Shah	1,200,000
Zehra		Crosby Dragon Fund	344,000
Zehra		Rubina Malkani	51,000
Zehra		Khalid Rafi	45,500
Zehra		Amna Shaikh	35,000
Zehra		Muhammad Ibrahim	25,000

' ...;V v>'. BfcW			
Zehra	19,235,500	JS & Company Limited	5,479,500
Zehra		Crosby Dragon Fund	2,451,500
Zehra		Shazia Sadiq	944,500
Zehra		JS Sons	822,000
Zehra		Saad Saeed Farooqui'	700,000
Zehra		Khalid Rafi	651,000
Zehra		Rubina Malkani	413,500
Zehra		Amna Shaikh	4000
Zehra		Muhammad Ibrahim	1000
Total	gajsssslsii	SMBO	1

Following are the two instances which clearly indicate that ZNA was acting as a conduit to wash trade in ANL shares among group members to create artificial turnover in the market.

Instance # 1

On June 13, 2007, ZNA bought 1 million shares from Jahangir Siddiqui Securities Services and at the same time she sold 822,000 shares to Jahangir Siddiqui & Sons Limited.

BUYER	DATE	TYPE	PRICE	QUANTITY	SUPPLIER
ZNA	20070613	BUY	37.00	1,000,000	Jahangir Siddiqui Securities Services Limited
ZNA	20070613	SALE	37.35	822,000	Jahangir Siddiqui & Sons (Private) Limited

The details of these trades are referred in Annexure 6.5.1.1

Instance# 2

On May 18, 2007 ZNA bought 2 million shares from Saad Farooqui a member of Group and sold the same quantity to Jahangir Siddiqui & Co on the next working day of May 21, 2007,Following is the detail of the transactions;

BUYER	DATE	TYPE	PRICE	QUANTITY	SUPPLIER
ZNA	20070518	BUY	34.00	2,000,000	Saad Farooqui
ZNA	20070521	SELL	40.25	2,000,000	JS Company Limited

Review Period 2

Similarly, the trading details of ZNA during the second review period showed that she bought 11,301,500 shares and sold 11,378,500 shares. She bought 55.78% of the above mentioned shares from the group members and sold 41.03% shares to the group members. The details of cross trading for second review period have been provided in Annexure 6.30.2

Zehra	11,301,500	Jahangir Siddiqui & Sons (Private) Limited	5,471,000
Zehra		Crosby Dragon Fund	497,500
Zehra		Saad Saeed Faruqui	325,000
Zehra		Rubina Malkani	10,000
	jMHI		

Zeh ra	11,378,500	Saad Saeed Faruqui	1,821,000
Zehra		Aziz Fidahusein & Company (Private) Limited	782,000
Zehra 1		Crosby Dragon Fund	715,000
Zehra ~\		Muhammad Riaz	675,500
Zehra i		Rubina Malkani	528,000
Zehra		Muhammad Ijaz	147,500
Total			

Wash Sales

Zehra w/o Nazim Aziz being daughter-in-law of Aziz Fidahussein & Co's CEO and the Directors, traded 782.000 shares with Aziz Fidahussein & Co Limited in second Review period. Since Mr.Aziz Fidahussein (CEO of AFH & Co), Mr.Nazim Aziz (Director of AFH) and Irfan Aziz (Director of AFH) have direct stake in A2iz Fidahussein & Co therefore there was no actual change of beneficial ownership took place hence a wash trade.,

Overall Conclusion:

Based on the observations noted above it is evident that Irfan Aziz is the actual offender who used ZNA account for his ulterior motives and, acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, he has violated the law and regulation such as:

Securities and Exchange Ordinance 1969, S-17(e), (ii), (iii), (iv), (v)
6.31 Muhammad Iqbal (M10):

Muhammad Iqbal s/o Abdul Sattar is Aziz Fidahussein & Co's client; he has done 87% of his trading with Saad Saeed Farooqi, client of JSGCL MIQ relationship with Dacia family has been described in earlier sections of the report.

Trading Pattern in Ready Market

MIQ trading period has been extended to August 2007 as compare to other clients due to the reason he has sold a large quantity of ANL shares to JSGCL client on August 07, 2007. Detail of his trading is as following:

DATE	Opening CFS	READY MARKET TRANSACTIONS		Closing CFS
	Finanee	BUYQTY	SALE QTY	Finanee
20070629		1,618,000		1,555,500
20070704	1,555,500	3,875,500		4,993,500
20070709	4,993,500	4D3,500		4,993,500
20070710	4,993,500		403, SOD	4,993,500
2007D806	4,993,500			5,161,OOD
20070807	5,161,000	236,DOO	4,619,000	236,000
Grand Total		6,133,000	5,022,500	

CDC Information:

CDC Information of Muhammad Iqbal		
BALANCE AS	CDC A/C#	BALANCE
April 02,2007	Sub A/C # 12825	Nil
July 31,2007		Nil

k w i jApcourtrj^ipnci 1 ^J^IQ		""Balance
Opening CDC Balance As on April 2nd,07	-	
Opening CFS Balance As on April 2nd,07	-	
■ Total Opening Balance as at April 2nd,07 ^ .v		
Total Buy During the Period	6,133,000	
Total Sell During the Period	(5,022,500)	
∴ # C D C ∴ £ a l a n b S ∴ .		
Shares out from CDC on 09.07.07 not appearing in KATS	62,500	
Shares not coming in CDS against buy of 3,875,500 & after CFS Adjustment on D4.07.07	437,500	
Shares not coming in CDC after CFS adjustment on 07.08.07	374,500	
Balance After CDC adjustment		236,000
Balance should be appe^ral on July18 liliilfIMf■		
		W:~f.
Shares added in CFS 06.08.07not supported by any transaction	167,500	
Shares Released from CFS not supported by any transaction in CDC and CFS on 07.08.07	(167,500)	
Closing CDC Bal As on July 18, 2007	-	
Closing CFS Balance July 13 2D07	(236,000)	
Total CldsingBalAr^app^ring^atJuly18,2607gSSiii5!S^f I IP\$itilt		(236,000) .
Difference in Closing Balance		

Payment Details:

M.Iqbal is a client of Aziz Fidahussein. To carry out huge transactions in ANL shares he made following two payments during the first review period:

[REDACTED]			
Muhammad iqbal	Aziz Fidahussein	10/08/2007	50,000,000
Muhammad Iqbal	Aziz Fidahussein	13/08/2007	3,807,430

On verification of the supporting instruments of these payments, following information of MS. Naila bank account was gathered:

My Bank-	Bank Name:	Stock Exchange Branch
01-100037-7	A/C number:	
05-09-2006	Opening Date:	
Muhammad	Introduced By:	Bilal
Umer	Joint A/C Holder:	Mashoo
Zubaida	Nominee/Next to Kin:	Dagia (Mother-in-Law of Ms. Naila)

Scrutinizing the bank account opening form and the bank statement of Ms.Naila, following observations were made, details of which have been provided under the individual head of Mr.M.Iqbal.

It was revealed that both of these payments have been made from a joint account of Ms.Naila, who is wife of Mr., Junaid Dagia s/o Abdul Hameed Dagia and Mr. Umer s/o Mashoo, which apparently have no personal or business link with each other.

Further Mrs. Zubaida Dagia (ZD) is the nominee of Ms. Naila and Umer bank account, ZD relationship with Ms. Naila has been written as 'Mother-in-Law' in the bank account opening form.

Husband of Ms. Naila, Mr.Junaid Dagia s/o Abdul Hameed Dagia is CEO and a Director in Technology Trade (Pvt) Limited, a share registrar company of all the JS Group companies. Please note that Mr.Mubashir Dagia, another son of Abdul Hameed Dagia is allowed to operate M.Iqbal brokerage account with Aziz Fidahussein.

- A payment of Rs3.8 million in form of cash was deposited by M.Iqbai in Aziz Fidahussein account and this payment was also released from Ms.Naila Umer account as Cash cheque and the amount was received by **Mr.Sadia Patni. front man of Munaf Ibrahim.** This is ample proof that all the parties are hand in manipulatingANLshares

The supporting documents of the above mentioned transactions have been provided in Annexure 6.31A

Details of Alleged Violations Cross Trades

The trading details of MIQ showed that he bought 6,133,000 shares and sold 5,022,500 during the review first period. He bought 86.86% of the above mentioned shares from the group members and sold 85.01% of the above mentioned shares to the group members. He bought 5.3 million shares from SSF and sold 3.4 million shares to Muhammad Riaz and Muhammad Ijaz, both are JS Clients and front of ANL Sponsors i.e Shaikh family.

The review period for Muhammad Iqbal has been extended to August 07, 2007 to include some major sale transactions. The following table reveals the quantities of shares that MIQ sold to other Group members. The detail of cross trades has been provided in Annexure 6.10.1.

M.IQ CIRCELAR TRADES WITH DTH ER GROUP MEMBERS			
FOR TH E PERIOD APRIL 02 TO AUGUST 07, 2007			
Client	MIQ Total Buy	Counter -Client	Quantity Sold
Muhammad Iqbal	6,133,000	Saad Saeed Farooqui'	5,165,D00
Muhammad Iqbal		Crosby Dragon Fund	162,000
Total	6,133,000		5,327,000
86.86% Cross Trades wi			th Group members

M.IQ CIRCELAR TRADES WITH OTHER GROUP MEMBERS			
FDR THE PERIOD APRIL 02 TO AUGUST 07,2007			
Client	MIQ Total Sale	Counter -Client .	Quantity Bought
Muhammad Iqbal	5,022,500	Muhammad Ijaz	1,758,000
Muhammad Iqbal		Muhammad Riaz	1,644,000
Muhammad Iqbal		Khalid Rafi	695,000
Muhammad Iqbal		Saad Farooqui'	172,500
Total	5.022.500		4,269,500
85.01% Cross Trades with Group members			

Overall Conclusion:

Based on the observations noted above it is evident that Muhammad Iqbal lent his name and trading account. Actual offender are the family members of Dagia family, including Mubashir Dagia and J unaid Dagia acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activity, they have violated the law and regulation such as:

- *Securities and Exchange Ordinance 1969, S-17(e), (ii) (v)*

6.32 Saba Irfan Aziz (SIA):

Saba is wife of Irfan Aziz, one of the Directors in Aziz Fidahussein & Co and also a client of Aziz

Fidahussein & Co Limited. She traded huge quantity of 11 miiion shares duringthe second review period. The trading detaii of Saba has been provided as under:

TRADING DETAILS OF SABA DURING REVIEW PERIOD 21

DATE	ISS	BEADYMARK		
		+		
26-Dec-07	-	900,000	692,000	
27-Dec-07		45,500	253,500	-
2-Jan-08			600,000	-
10-Jan-08			10,000	.
15-Jan-08		594,500	108,000	486,500
16-Jan-08	486,500	533,500	528,500	491,500
17-Jan-08		25,500	547,000	-
18-Jan-08		500	352,000	.
21-Jan-08		150,000	m	150,000
22Jan-08		180,000	330,000	-
25-Jan-08		276,500	276,500	-
6-Feb-08	-	400,000	400,000	-
12-Feb-08	-	558,500	47,500	511,000
13-Feb-08	511,000	569,000	480,000	600,000
14-Feb-08	600,000	25,000	25,000	600,000
15-Feb-08	600,000	490,500	290,500	800,000
19-Feb-08	764,000	176,500	211,000	764,000
20-Feb-08	764,000	13,500	370,000	764,000
21-Feb-08	175,000	-	159,000	175,000
22-Feb-08	-	.	250,000	-
27-Mar08		1,510,500	-	1,374,500
28-Mar-08				2,599,000

	1,24r,000	1,0^0,uuu		
31-Mar-08	998,000	-	1,441,000	998,000
1-Apr-08		-	1,159,000	-
3-Apr-08		50,000		-
4-Apr-08		1,600,000	650,000	878,000
7-Apr-08	-		1,000,000	-
8-Apr-08		500,000	400,000	-
9-Apr-08		139,500	239,500	-
10-Apr-08	-	300,000	300,000	-
14-Apr-08		100,000	100,000	
15-Apr-08	-	110,000	110,000	
16-Apr-08		100,000	100,000	-
	wmm		«RBW«55\$5	

CDC Information:

■: % V ; * ' D C ^ I ^ j j n a t t d r t		
BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	9839	Nil
April 22,2008		Nil

	mmm-:	
■ v-r»s ■ ■, r.iH		Balarice. .
Opening CDC Balance As on Nov 29,2007	-	
Opening CFS Balance As on Nov 29,2007	-	
Total Opening Balance as at N6v29^2007' "• ;' • • ^ -,	'**■ ' **	
Total Buy Duringthe Period	10,877,000	
Total Sell During the Period	(11,968,500)	
	S ■ » ■ *- v--:	fe691500)'
Oelivery not received in CDC 2612-2007	(208,000)	
Oelivery not out from CDC 27-12-2007	208,000	
Delivery not out from CDC 02-01-2008	600,000	
Delivery not out from CDC 10-01-2008	10,000	
Oelivery not out from CDC 17-01-2008	30,000	
Oelivery not out from CDC 18-01-2008	351,500	
Excess delivery made on 17-01-2008	5,000	
Delivery out not supported by any trans 21-012008	(5,000)	
Feb 22,2008 Delivery received in COS not supported by any transaction	13,500	
Excess Delivery received Feb 25,2008	60,000	
Delivery not out in CDC Feb 20,2008	356,500	
Delivery not received in CDC Feb 21,2008	(430,000)	
Delivery not out in CDC Mar 28,2008	100,000	
Sa/ance After CDC Adjustments J.		fe^ 1,091,500;
Closing CDC Bal As on April 22,2008	-	
Closing CFS Balance April 22,2008	0	
Tota/ Closing Balance appearing as at April 222008 i^s;		

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Bank Al-Falah

Joint A/C Hoider: Nominee/Next to

]

Bank Name:

Kin:

]

Payment Information:

During the course of investigation we examined the financial records of Aziz Fidahussein & Co and it was found that the copies of payments received from and paid to the client were not maintained by the relevant brokerage house, while clause 9 of Account Opening Form (KSE General Regulations) has made it mandatory for ali the brokerage houses to pay any amount of Rs.25,000 and over through a cross cheque/bank draft or pay order and retention of copy of instrument for minimum periods of Five (5) years.

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During the investigation it was found that Ms. Saba maintains her accounts with Bank Al-Falah and JS Bank. In both the bank accounts Irfan Aziz her husband and Director of Aziz Fidahussein & Co is a joint account hoider. As it is apparent from the trading details that SiA actively traded during the second review periods and both of her bank account were opened just a month before the review period. Following are the details of both Bank accounts:

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A/C number:	Bank Al-Falah Stock Exchange
Dopening	Branch 02001180
Date:	6- 11-2 DO 7
Introduced	Aziz Fidahussein & Co Pvt (Ltd)
By:	Irfan Aziz Nil

]

The purpose of opening this account was shown as investing in shares however no major transactions were carried out through this account and ultimately the account was closed.

Following are the bank account information pertains to JS Bank, where she has joint account with her husband Mr.irfan Aziz:

JS	Bank Name:	Bank- Stock Exchange Branch
	A/C number:	240002474
	Opening Date:	11-2007
30-Iqbal	introduced By:	Rangiia (who also introduced the account of Mehboob Kaiyar in the same bank)
irfan	Joint A/C Hoider:	Aziz
Nil	Nominee/Next to Kin:	

The purpose of opening this account was shown as investing in shares.

It is also important to mention here that all the substantial payments as proceedings of her trading in the scrip of ANL were received in JS Bank (one of the accused) and all these substantial payments were transferred from Aziz Fidahussein & Co bank account with JS Bank.

Following payments of considerable amounts issued to SIA by Aziz Fidahussein & Co and all these payments made through JS Bank, an associate bank of JS Group.

JS Bank - Payments Received by Aziz Fidahussein & Co						
31-12-2007	123602	AFH	SABA	10,539,905	Received on 01-01-08	Aziz Fidahussein & Co
17-01-2007	123619	AFH	SABA	10,638,230	Returned to AFH	Aziz Fidahussein & Co
12-03-2008	123630	AFH	SABA	3,250,000	Received on 12-03-08	
17-03-2008	123635	AFH	SABA	4,000,000	Received on 17-03-08	Sarfraz Aziz (Director AFH)
17-03-2008	123637	AFH	SABA	5,500,000	Received on 18-03-08	Cash Withdrawal
28-03-2008	123643	AFH	SABA	12,500,000	Received on 28-03-08	
31-03-2008	123650	AFH	SABA	5,000,000	Received on 01-04-08	
14-04-2008	123669	AFH	SABA	2,000,000	Received on 15-04-08	Cash Withdrawal
16-04-2008	123673	AFH	SABA	1,879,750	Received on 16-04-08	Cash Withdrawal
16-04-2008	123674	AFH	SABA	2,004,000	Received on 16-04-08	Cash Withdrawal

Extending the probe of the Saba and Irfan Aziz, JS Bank account, we gathered the following mentioned info. The following table reveals that all the major funds received in their joint account were subsequently transferred to Aziz Fidahusein & Co or just withdrawn in the form of Cash. The withdrawal of Rs.100 million cheque in form of cash strengthened the fact that the purpose of issuing Cheques in form of cash was to hide the ultimate of beneficiary of the subject substantial amounts.

Unlike Zehra payment detail where the Bank Al-Habib provided us the info of ultimate beneficiary of Zehra’s cash cheques i.e Aziz Fidahussein & Co, JS Bank just informed us that all the cash payments were received by Saba and Irfan Aziz.

	JIS^Beneficiaries >: *■			mmmmmm
Saba/ Irfan Aziz	Cash Cheque	19-12-2007	113682	100,000,000
Saba/ Irfan Aziz	JS Global	27-12-2007	113684	20,000,000
Saba/ Irfan Aziz	Aziz Fidahussein & Co	31-12-2007	113686	58,445,974.93
Saba/ Irfan Aziz	Aziz Fidahussein & Co	02-01-2008	113688	10,535,000
Saba/ Irfan Aziz	Aziz Fidahussein & Co	04-01-2008	113689	32,000,000
Saba/ Irfan Aziz	Cash Cheque	09-01-2008	113691	6,000,000
Saba/ Irfan Aziz	Cash Cheque	09-01-2008	113690	9,000,000
Saba/ Irfan Aziz	Sarfraz Aziz	17-03-2008	107013	4,000,000
Saba/ Irfan Aziz	Cash Cheque	19-03-2008	107014	5,430,000

saDa/ irtan Aziz	uasn Cheque	'/1-U3-2U<JfcS	1U fUlf<	
Saba/ Irfan Aziz	Cash Cheque	27-03-2008	107017	5,400,000
Saba/ Irfan Aziz	Cash Cheque	27-03-2008	107015	5,000,000
Saba/ Irfan Aziz	Cash Cheque	15-04-2008	107025	2,000,000
Saba/ Irfan Aziz	Cash Cheque	16-04-2008	107027	2,000,000
Saba/ Irfan Aziz	Cash Cheque	16-04-2008	107026	1,876,000
Saba/ Irfan Aziz	Aziz Fidahussein & Co	29-04-2008	Account to Account Transfer	1,099,000
Saba/ Irfan Aziz	Aziz Fidahussein & Co	02-05-2008		1,050,000
Saba/ Irfan Aziz	Cash Cheque	09-05-2008	107037	1,737,500
Saba/ Irfan Aziz	Cash Cheque	13-05-2008	107040	3,750,000
Saba/ Irfan Aziz	Cash Cheque	20-05-2008	107044	30,354,558
Saba/ Irfan Aziz	Cash Cheque	21-05-2008	107048	2,230,000
Saba/ Irfan Aziz	Cash Cheque	21-05-2008	107045	2,300,000
Saba/ Irfan Aziz	Cash Cheque	21-05-2008	107047	2,400,000
Saba/ Irfan Aziz	Cash Cheque	21-05-2008	107046	2,200,000
Saba/ Irfan Aziz	Aziz Fidahussein & Co	23-05-2008	Account to Account Transfer	7,992,944.86

In continuation of the above we noted that the instrument used for the following mentioned payment issued to Sarfraz Aziz, brother of Irfan Aziz and another Director of Aziz Fidahussein & Co was different and showing the name of Aziz Fidahussein & Co at the place of signatory instead of Saba and Irfan Aziz as mentioned in the rest of the instruments used.

ISSUER	Beneficiary	DATE	INSTR	AMOUNT
Aziz Fidahussein & Co	Sarfraz Aziz	17-03-2008	107013	4,000,000

Following two major payments were provided by Aziz Fidahusein & Co, as Saba margins/deposit payments for her trading account:

					The information received from SBP revealed th the payment was receiv. from Growth Securities and no such payme I withdrawnfrom Saba/Irfan Aziz ba account.
02-04-08	873773	SABA	Aziz Fidahussein & Co	7,532,264	
					Payment was made form of cash but no su, amount om withdrawn from any of SI A a bo mentioned account on the mentioned date the
29-04-08	445509	SABA	Aziz Fidahussein & Co	3,000,000	

All the above mentioned facts reveal that Aziz Fidahusein & Co and Irfan Aziz are the ultimate beneficiaries of all the proceedings from the Saba trading account.

The supporting documents of the above mentioned information have been provided in Annexure 6.32 A

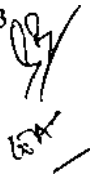
Details of Alleged Violations Cross Trades

The detail of cross trade for second review period has been provided in **Annexure 6.32.1.**

SIAQROSS JI			
Client -			
SABA	10,877,000	Saad Saeed Faruqui	871,000
SABA		Zaibunnisa	756,000
SABA		Crosby Dragon Fund	616,000
SABA		Muhammad Asif Mendha	392,500
SABA		Js Bank Limited	300,000
SABA		Rashid Siddiqui -	150,500
SABA		Rubina Malkani	87,000
SABA		Js Investments Limited	66,000
SfiM		Mfii	Mwaaa
SABA		Js income Fund	5,000
Total I,.	10,877,000	- J,'	
16% CrossTrad«^iJtflC^j^errib[rB:]			

> f-is^i.cii			
SABA	11,968,500	Zaibunnisa	856,500
SABA		Saad Saeed Faruqui	697,000
SABA		Aziz Fidahusein & Company (Private) Limited	610,000
SABA		Rashid Siddiqui	330,500
SABA		Muhammad Asif Mendha	323,000
SABA		Crosby Dragon Fund	65,000
SABA		Js Investments Limited	50,000
sms		mm	nasBsari
SABA		M Riaz	42,000
SABA		Js Income Fund	36,000
SABA		Rubina Malkani	14,500
SABA		M Ijaz	7,500
Total -s'f	111,968,5001		?SiSi\$^il£^>069,500;
; ; 'iTLi			

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Wash Sales

The above mentioned Cross trades showed that Saba not only traded with Aziz Fida Hussein & Co but also with her own account during the second Review period. Since Mr.Aziz Fidahussein (CEO of AFH & Co), Mr.Nazim Aziz (Director of AFH and Husband of Zehra) and Irfan Aziz (Director of AFH and Husband of Saba) have direct stake in Aziz Fidahussein & Co therefore there was no actual change of beneficial ownership took place hence showed a wash trade, done by AFH

Overall Conclusion:

Based on the observations noted above it is evident that Saba Irfan Aziz account was used by his husband Irfan Aziz, acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. He has also been found violating the securities law by doing wash sales. By indulging in above referred manipulative and prohibitive activities has violated the law and regulation such as:

6.33 Aziz Fidahussein & Co Limited (AFH):

AFH role as broker in the manipulation scheme of ANL shares has been discussed in the beginning of the report. Following information covers the trading aspects of the brokerage house carried out in the name of AFH:

TRADING DETAILS OF AZIZ FIDA HUS&CO DURING REVIEW PERIOD 2:

■•DATE^i^sfr- .Mp!				
	:flfanc\$ellffi ■w2< • ΔI*	BUYQTY.		
20071129		-	30,000	-
20071130		-	2,000,000	-
20071211		15,000	15,000	-
20071212	*	42,000	.	-
20071213		14,500	.	
20071214	-	141,000	-	
20071217		364,500	71,000	-
20071218		24,000	25,000	*
20071219	-	40,500	20,000	•4
20071224		-	10,000	-
20071226	-	457,000	10,000	290,000
20071227	30,000	201,500	5,000	30,000
20080102	30,000	610,000	114,500	583,500
20080104	583,500	-	5,000	583,500
20080109	553,500	-	85,000	553,500
20080110	73,500	30,500	307,000	277,000
20080111	277,000	127,500	15,000	277,000
20080114	277,000	9,000	75,000	277,000
20080115	277,000	71,500	167,000	227,000
20080116	227,000	152,000	15,000	227,000
20080117	227,000	30,000	10,000	247,000

20080118	247,000	185,000	80,000	385,500
20080121	344,000	50,000	10,000	384,000
20080122	384,000	10,000	45,000	384,000
20080123	329,000	w	21,500	329,000
20080124	289,000	-	30,000	289,000
20080128	242,000	w	55,000	242,000
20080129	192,000	-	15,000	192,000
20080130	138,500		20,000	172,000
20080131	33,500		40,000	132,000
20080201	132,000		10,000	132,000
20080204	132,000	5,000	5,000	132,000
20080206	132,000		20,000	132,000
20080207	132,000	-	3,500	132,000
20080208	132,000		5,000	132,000
20080211	117,000		10,000	117,000
20080212	117,000		10,000	117,000
20080213	101,000	-	5,000	101,000
20080214	101,000		5,000	101,000
20080220	101,000		10,000	101,000
20080225	2,500	.	20,000	2,500
20080226			10,000	-
20080227			15,000	-
20080228		-	2,000	.
20080229	-	-	6,000	.
20080303			10,000	-
20080304	-	-	8,500	,
20080305			10,000	-
20080306		20,000	-	-
20080307		15,000	10,000	-
20080310		.	13,000	-
20080311				-

	-	b,UUU	D,UUU	
20080312		2,500	7,500	
20080313	-	39,000	-	39,000
20080314	39,000	25,000	10,000	54,000
20080317	54,000	55,000		54,000
20080318	54,000	15,000		54,000
20080319	54,000	.	10,000	54,000
20080326	54,000	10,000	-	54,000
20080401	-		146,500	
20080410		30,000	-	-
20080411	-	15,000	-	-
20080414	-		35,000	
20080418		-	10,000	-
20080421	-	10,000	-	-
20080422	-	30,000	10,000	
GrandTotal#-			fBSBIWS	

CDC Information:

		i Ji
BALANCE AS AT	CDC A/C#	BALANCE
April 02,2007	House A/C 51	Nil
July 31,2007		Nil
November 29,2007		2,000,000
April 22,2008		30,000

		ifill
Opening CDC Balance As on Nov 29,2007	2,000,000	
Opening CFS Balance As on Nov 29,2007	-	
Total Opening Balance as at Nov 29,2007 '1'...		r^ooo,poo;
Total Buy Duringthe Period	2,852,000	
Total Sell Duringthe Period	(3,718,000)	
: CDCtatant^wwwjngbringseilM^wlepet^www	Wii	IlfJlaio
Delivery not out from CDC - Tran. Date Jan 02,2007	30,000	
Delivery not received in CDC - Tran. Date Dec 19,2007	(500)	
Delivery not received In CDC - Tran- Date Dec 26,2007	(157,000)	
Delivery not received in CDC - Tran. Date Dec 27,2007	(243,000)	
Delivery not out from CDC - Tran. Date Jan 02,2007	58,000	
Delivery out not supported by any trans - Sett Date Jan 04,2008	(648,000)	

Excess delivery made - Sett on January 17,2008	(5,000)	
Delivery not received in CDC-Tran. Date Jan 18,2008	(105,000)	
Delivery not out from CDC-Sett. Date Jan 25,2008	1,500	
Excess delivery received - Sett on Mar 26,2008	33,000	
Delivery out not supported by trans - Sett Date Jan 24,2008	(8,D00)	
Delivery out not supported by trans - Sett Date Jan 25,2008	(27,000)	
Delivery out not supported by trans-Sett Date Mar 27, 2008	(33,000)	
Closing CDC Bal As on April 22,2008	(30,000)	
Closing CFS Balance April 22,2008	-	
		»J..T ¹ ^i...£1

Payment Information:

Since the Aziz Fidahusseini & Co Ltd was trading for its own house therefore we didn't review the payment details of AFH. However the payments paid to Zehra & Saba other major clients of the house have been covered under the individual heads of these two clients.

Details of Alleged

Violations Cross Trades

The detail of cross trade for second review period has been provided in Annexure 6.33.1.

AFH CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
Client	Total Buy	Counter Client	Quantity Sold
AZIZ FI DA HUS&CO	2,852,000	Zehra	782,000
AZIZ FI DA HUS&CO		Saba	610,000
AZIZ FI DA HUS&CO		Muhammad Asif Mendha	
AZIZ FI DA HUS&CO		Crosby Dragon Fund	
AZIZ FIDA HUS&CO		Saad Saccd Faruqui	
AZIZ FIDA HUS&CO		Shazia Sadiq	164,500
			69,500
AZIZ FIDA			36,000
HUS&CO Total J			500
		Rubina Malkani	1000

AZIZ FIDA HUS&CO CROSS TRADES WITH OTHER GROUP MEMBERS			
FOR THE PERIOD NOVEMBER 29, 2007 TO APRIL 22, 2008			
Client	Total Sell	Counter Client	Quantity Sold
AZIZ FIDA HUS&CO		Saad Saeed Faruqui	1,972,500
AZIZ FIDA HUS&CO		Muhammad Asif Mendha	93,000
AZIZ FIDA HUS&CO		Jahangir Siddiqui Securities Services	89,000
AZIZ FIDA HUS&CO		Crosby Dragon Fund	84,500
AZIZ FIDA HUS&CO		Rashid Siddiqui	72,000
AZIZ FIDA HUS&CO		Muhammad Riaz	20,000
AZIZ FIDA HUS&CO		Js Growth Fund	5,000
AZIZ FIDA HUS&CO		Muhammad Ijaz	5000
AZIZ FIDA HUS&CO		Aalia Shiraz	2500
AZIZ FIDA HUS&CO			ik/. L
AZIZ FIDA HUS&CO			

Wash Sales

The above mentioned Cross trades showed that AFH has traded with both Zehra AND Saba during the second Review period. Since Mr.Aziz Fidahussein (CEO of AFH & Co), Mr.Nazim Aziz (Director of AFH and Husband of Zehra) and irfan Aziz (Director of AFH and Husband of Saba) have direct stake in Aziz Fidahussein & Co therefore there was no actual change of beneficial ownership took place hence showed a wash trade, done by AFH.

Overall Conclusion:

Based on the observations noted above it is evident that Aziz Fidahussein & Co Limited, acting in concert with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. Mr. Irfan Aziz one of the Director of AFH has also been found violating the securities law by doing wash sales on behalf of his company and other two members of the family. By indulging in above referred manipulative and prohibitive activities AFH & Irfan Aziz has violated the law and regulation such as:

- Securities and Exchange Ordinance 1969, § 17(e), (ii), (Hi), (iv), fvj
- Brokers and Agents Registration Rules, 2001- R-12 Brokers to abide by code of conduct Brokers

6.34 Muhammad Asif Mendha (MAM):

Asif Mendha appeared as the biggest trader in the scrip of ANL as a client of Live Securities. He bought substantial quantity of 27 million ANL shares and sold 23 million during the second review period, out of which he bought 42% from the Group members and sold 37% of shares to them.

TRADING DETAILS OF MUHAMMAD ASIF MENDHA FOR REVIEW PERIOD 2:				
m				
26-Dec-07	0	65,000	0	0
27-Dec-07	0	0	65,000	0
7-Jan-08	0	596,500	0	596,500
8-Jan-08	596,500	0	0	596,500
9-Jan-08	596,500	1,523,500	620,000	1,500,000
10-Jan-08	1,500,000	575,000	0	2,075,000
11-Jan-08	0	20,000	2,075,000	20,000
14-Jan-08	20,000	1,485,000	0	1,500,000
15-Jan-08	1,500,000	500,000	0	2,000,000
16-Jan-08	0	0	2,120,000	0
18-Jan-08	0	3,064,000	0	3,064,000
21-Jan-08	0	0	3,164,000	0
22-Jan-08	0	756,000	0	756,000
23-Jan-08	756,000	2,000,000	0	2,756,000
24-Jan-08	1,992,000	0	763,500	1,992,500
25-Jan-08	1,992,500	790,000	0	2,782,500
28-Jan-08	2,000,000	0	782,500	2,000,000
29-Jan-08	2,000,000	1,000,500	500,500	2,500,000
30-Jan-08	2,500,000	0	0	2,500,000
31-Jan-08	2,500,000	0	65,000	2,500,000
1-Feb-08	1,000,000	0	1,435,000	1,000,000
4-Feb-08	0	2,000	1,002,000	0
12-Feb-08	0	1,005,000	0	1,005,000
13-Feb-08	1,005,000	0	0	1,005,000
14-Feb-08	1,005,000	0	0	1,005,000
15-Feb-08	1,005,000	0	0	1,005,000
18-Feb-08	1,005,000	0	0	1,005,000
19-Feb-08	1,005,000	150,000	0	1,155,000
20-Feb-08	1,155,000	0	0	1,155,000
21-Feb-08	1,155,000	0	0	1,155,000
22-Feb-08	1,155,000	0	0	1,155,000
25-Feb-08	1,155,000	0	0	1,155,000
26-Feb-08	1,155,000	0	0	1,155,000
27-Feb-08	1,155,000	1,386,500	0	2,541,500
28-Feb-08	541,500	0	2,000,000	541,500
29-Feb-08	486,000	1,000,000	1,041,500	486,000

3-Mar-08	486,000	1,652,000	500,000	1,638,000
4-Mar-08	1,638,000	362,000	14,000	1,986,000
5-Mar-08	1,986,000	520,500	6,500	2,500,000
6-Mar-08	2,500,000	0	0	2,500,000
7-Mar-08	2,500,000	0	0	2,500,000
10-Mar-08	1,000,000	0	1,500,000	1,000,000
11-Mar-08	1,000,000	1,541,000	7,000	2,534,000
12-Mar-08	698,500	200,000	2,034,000	700,000
13-Mar-08	700,000	1,688,500	1,188,500	1,200,000
14-Mar-08	0	301,000	1,000	300,000
17-Mar-08	300,000	0	20,500	300,000
18-Mar-08	300,000	0	25,000	300,000
19-Mar-08	300,000	0	0	300,000
20-Mar-08	300,000	0	0	300,000
21-Mar-08	300,000	0	0	300,000
24-Mar-08	300,000	0	0	300,000
25-Mar-08	300,000	1,154,500	108,500	1,346,000
26-Mar-08	324,500	7,500	978,500	325,500
27-Mar-08	500	0	325,000	500
14-Apr-08	0	37,500	0	37,500
15-Apr-08	37,500	62,500	0	100,000
16-Apr-08	100,000	644,500	0	719,500
17-Apr-08	719,500	1,080,500	0	1,800,000
18-Apr-08	1,800,000	517,000	17,000	2,203,500
21-Apr-08	2,203,500	0	0	2,203,500
22-Apr-08	2,203,500	1,665,500	1,165,500	2,703,500
Grand Total \$				filSI

CDC Information:

BALANCE AS AT	CDC VC#	BALANCE
November 29,2007	7922	Nil
April 22,2008		Nil

. : Account Reconciliation of MAM Account in Second Review Period --Wmmt^		
	'■'Shares'--i ■	
Opening CDC Balance As on Nov 29,2007		
Opening CFS Balance As on Nov 29,2007		
Total auy During the Period	27,353,500	
Total Sell During the Period	-23,525,000	
(^balan(^aftera(^ust}ngb^ng/sell!ngdt^lngthefxrlcKl^<\$^ ^	? . 4.	
Adjustment		
Delivery of Shares not received in CDS	(65,000)	
Delivery of shares not found in CDS	65,000	
Less shares received in CDS	(5,000)	

Less shares out from CDS	120,000	
Less shares out from COS	100,000	
Delivery of shares not found in COS	65,000	
Delivery of Shares not received in COS	(65,000)	
Less shares received in CDS	(14,000)	
Shares released from CFS should received in CDS	(1,200,000)	
Delivery of shares not found in CDS	20,500	
Delivery of shares not found in CDS	25,000	
Less shares received in CDS	(49,500)	
Less shares received in COS	(500)	
Less shares received in CDS	(25,000)	
Less shares received in CDS	(96,500)	
Total ¹		mmmmmm
Closing CDC Bal As on April 22,2008	-	
Closing CFS Balance April 22,2008	(2,703,500.00)	
<i>Tntiti</i> Differerice ¹		

Payment Information:

The Financial Ledger of the said client, maintained with the brokerage house reveals that Mr.Mendha is an active trader in the capital market, investing in different shares including ANL. However despite of huge investment made by the said client only two payments were noticed, which were paid by the client to the brokerage house during the period November 27, 2007 to April 30, 2008.

Provided this scenario huge debit balances were appearing in the client account, some times more than two or three month's period. For instance for the period of 28.02.2008 to 16.04.2008 a continuing debit balance appearing in Mr.Mendha account, despite of which various payments of substantial amounts, made to him during the aforementioned period.

On enquiry about this lack of risk management in the aforementioned account of Asif Mendha, the brokerage house provided the Commission another ledger of the client showing credit balances. However on further scrutiny it was revealed by the CEO of Live Securities that this ledger does not contain any real transactions carried out by MAM and fake entries have been shown to incorporate the interest rate on the deposit amount given by MAM Details have been covered in earlier section 5.7.3 of the report.

As it has mentioned earlier in Live Securities section (5.7,3) that the copies of payments received from and paid to the client were not maintained by the relevant brokerage house. However, on strict demand of SECP the brokerage house arranged some copies from the relevant banks and sent a status sheets revealing all the Cheques issued to Mr.Mendha. We further sent this information to SBP to independently verify the record and acquired the bank statement of Mr.Mendha, copies of cheques and other information related to beneficiaries. The following section will cover the information obtained from aforementioned SBP records:

Following two payments were made by Asif Mendha, during the period November 27, 2007 to April 30,

PAYMENTS ISSUED ON BEHALF OF ASIF MENDHA BY LIVE SECURITIES:

20Q8.These two credits were transferred from another account of MAM maintained with Live Securities:

08-02-2008	Live Securities	6,902,781
09-02-2008	Live Securities	20,767,797

FINANCIAL LINKS AMONG ASIF MENDHA, LIVE SECURITIES AND IRFAN AMANULLAH:

As it has mentioned in earlier section 5.6.3 of Live Securities that Asif Mendha was trading in the scrip of ANL in connivance with CEO of Live Securities, Ashraf Dossani and company secretary of Attock Cement., Irfan Amanullah. irfan Amanullah has also been identified as cousin of Ashraf Dossani and the ultimate beneficiary of Asif Mendha.

The following details will reveal the Financial Links among all the aforementioned three individuals and Live Securities.

ASIF MENDHA & IRFAN AMANULLAH

The following info confirmed the link between the two individuals. As mentioned earlier in section 5.5.S of Financial Li nks that Asif Mendha has an account in MCB PNSC Branch. *The 'Authority to contact' or 'Next to Kin' section of the account opening form revealed the name of Mr.Irfan Amanullah c/o Attock cement*

The following note, written by the bank official has also been found on account opening form:
'Account *is being* introduced by the official of M/S Attock Cement and they have also Informed us that Mr. Muhammad Asif Mendha will keep substantial balance In his account'

Asif Mendha also opened another bank account, duringthe second review period with JS Bank tone of the accused). The details of this bank account are as following:

Bank Name: JS Bank DHA Branch
A/C number: 200009737
Opening Date: 13-02-2008
Introduced By: Not mentioned Joint
A/C Holder: Nil

In continuation of the above Asif Mendha received the huge amounts of payments in his MCB bank account from Live

Securities and passed substantial 17.6 million to different officials of Attock Cement mainly Irfan Amanullah using both bank accounts. Following table reveals the detail of these payments:

Asif Mendha	Babar Bashir	CEO	01.12.2007	5395189	1,000,000
Asif Mendha	Irfan Amanullah	Company Secretary	23-10.2007	5395186	*2,156,000
Asif Mendha	Irfan Amanullah	Company Secretary	07-01-2008	6562126	*1,600,000
Asif Mendha	Irfan Amanullah	Company Secretary	21-04-2008	7294888	6,500,000
Asif Mendha	Moinuddin Nasim	Internal-Audit Official	2905-2008	1052826/3 2922508	4,175,000
Asif Mendha	Sheikh Tariq Jamil	I.T Manager Attock	03-05-2008	0387105	*1,200,000
Asif Mendha	Sheikh Tariq Jamil	Cement	09-05-2008	0387111	*1,000,000
					17,631,000

Transferred through JS Bank

In addition to the above, the following two payments were issued by Asif Mendha to First Capital Equities (Brokerage House):

' iiKISSLJSES^HHS	First Capital Equity	19.05.2008	7294889	1,154,958
Mr.Asif Mendha				
MrAsif Mendha	First Capital Equity	22.05.2008	7294894	1,790,329

On enquiry from FCEL it was revealed that these two payments have been paid by Asif Mendha on behalf of Ms.Shafaq Irfan, who is the wife of Mr.Irfan Amanullah as mentioned in her account opening form with FCEL Mr.Irfan is also a nominee in his wife trading account. The supporting documents have been provided in Annexure 6.31.5.

The following table reveals the other transactions taken place directly between FCEL and Irfan Amanullah and his wife Shafaq Irfan:

First Capital Equity	Irfan/Shafaq	24.03.2008	02667041	2,748,463
First Capital Equity	Irfan/Shafaq	15.04.2008	2901093	6,800,669
First Capital Equity	Irfan/Shafaq	23.04.2008	2902038	2,325,639
Irfan/Shafaq	First Capital Equity	17.03.2007	1788846	3,564,000
Irfan/Shafaq	First Capital Equity	01.04.2008	1788850	7,500,000

PAYMENTS ISSUED ON BEHALF OF ASIF MENDHA BY LIVE SECURITIES:

Despite the huge balances appearing in the client’s account, cumulative payments of Rs.84.82 million issued to the subject client by Live Securities. The details of payments have been provided in Annexure 6.31.3.

The following mentioned cheques have been issued to other individuals prima facie all are the employees and associates of Live Securities. Details have been covered under in the earlier section (5.6.3) of the report. The supporting documents have been provided in Annexure 6.31.4.

16/01/2008	1034741	Bank Alfalah	Live Securities	Abdul-Rasheed	5,124,000
11/02/08	1036004	BankAifalah	Live Securities	Mr. Amir	13,832,000
21/02/2008	1035574	Bank Alfalah	Live Securities	Mr.Sameer	8,560,940
28/02/2008	1141760	BankAifalah	Live Securities	Mr-Arif Razzak	5,502,900
28/02/2008	1141761	Bank Alfalah	Live Securities	Mr.Sameer	5,500,000
28/02/2008	1141762	BankAifalah	Live Securities	Mr.Sameer	4,500,000
28/02/2008	1141763	BankAifalah	Live Securities	Mr.Sameer	5,000,000

CASH PAYMNETS ISSUED BY Mr.MENDHA:

Large number of cash cheques were issued, details are as following:

1	Asif Mendha	23-Jan-Q8	6562133	1,000,000	Mohd Hanif
	Asif Mendha	23-Jan-08	6562132	1,000,000	Mohd Hanif
	Asif Mendha	23-Jan-08	6562192	1,000,000	Mohd Hanif
	Asif Mendha	23-Jan-08	6562130	1,000,000	Mohd Hanif
	Asif Mendha	23-Jan-08	6562134	1,000,000	Mohd Hanif
	Asif Mendha	23-Jan-08	6562131	1,000,000	Mohd Hanif
	Asif Mendha	9-Apr-08	7294877	1,000,000	Nasir Shah
	Asif Mendha	14-Apr-08	7294878	1,000,000	Not Known
	Asif Mendha	14-Apr-08	7294876	1,000,000	
10	Asif Mendha	14-Apr-08	7294882	1,000,000	
11	Asif Mendha	15-Apr-08	7294880	1,000,000	Mohd Rahil
12	Asif Mendha	21-May-08	7294892	4,591,892	Mohd Nawaz
13	Asif Mendha	29-May-08	7294897	2,000,000	Mohd Rafiq

- 1. Serial number 1-6 in the above mentioned table reveals that all the six (6) cheques have been issued on same day and collected by Mr. Mohd Hanif. The CNIC information of Mr.Hanif showed that he is a resident of Dada Terrace, Sharafabad, Karachi. The back side of ail the cheques showed the signature other than Mr.Hanif and last cheque showing a note 'Confirmed by Attock Cement Manager MrAmir*'.
- 2. Cheque mentioned on S.no 7 en-cashed by Nasir Shah a resident of Orangi Town, Karachi. The back of cheque shows a reference of 'Live Security Money Exchange*'.
- 3. Cheques mentioned in S.no 8-10 have been withdrawn at MCB North Napier Road Branch. The branch has provided us the scan copy of the front, while the copy of the back of the cheque is not available with them.
- 4. Cheque mentioned on S.no 11 has been received by Mr.Mohd Rahil, a resident of Fatima Colony, Jamshed Road, Karachi.
- 5. Cheque mentioned in S.no 12 en-cashed by Mr.Mohd Nawaz, a resident of Nishter road, Karachi. The back of cheque shows a reference of 'Kalla Stock Exchange'.
- 6. The last cheque on S.no 13 has en-cashed by Mr.Mohd Rafiq a resident of Mohammadi Colony, Kemari, Karachi. The back of cheque shows a reference of 'Ashraf Dossani and Kalia Saima Tower 11th Floor'. Another cheque # 7294900 of Rs:3,000,000 issued in the name of Mr.Qasim on 29-05-2008, also shows a reference of Mr.Ashraf Dossani name, CEO of Live Securities.

In continuation of the above following is the payment which was issued by Asif Mendha to Mr.Abdul Rauf having his bank account in Habib Metropolitan Bank. His Bank account opening form revealed his profession as 'Cement Dealer':

Issuer	Beneficiary	Date	Instrument	Amount
Asif Mendha	Abdul-Rauf	20-05-2008	7294893	1,020,737

On further probing it was revealed that the same payment was transferred to Live Securities account on very next day. Details are as following:

Id I ?) % <1 anjnS)»*,.■ .. ?				
Abdul-Rauf	Live Securities	21-05-2008	i 25269261	1,020,737

The supporting documents of all the above mentioned payments have been provided in Annexure 6.34A


PAYMENTS ISSUED ON BEHALF OF ASIF MENDHA BY LIVE SECURITIES:

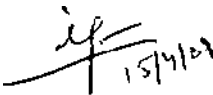
Overall Conclusion:

Based on the observations noted above it is evident that Asif Mendha, acting in concert with CEO of Live Securities Mr.Ashraf Dossani and Company Secretary Mr.Irfan Amanullah and also with other members of the 'Group', was involved in price manipulation of Azgard Nine Limited during the review period. By indulging in above referred manipulative and prohibitive activities they have collectively violated the law and regulation such as:

- Securities and Exchange Ordinance 1969, S-17(e), (ii), (v)

Submitted By:


Shazia Baig
Deputy Director-SMD (South)



Waqar Ahmed Siddiqui
Joint Director-SMD (South)

- Securities and Exchange Ordinance 1969, S-17(e), (ii), (Hi), (iv), (v)
- Securities and Exchange Ordinance 1969, S-1ZfeJ, (ii), (v)
- Securities and Exchange Ordinance 1969, S-17(e), (ii) (v)
- Securities and Exchange Ordinance 1969, S-17(e), (ii), (v)