

FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS

DEPARTMENT OF ENFORCEMENT,

Complainant,

v.

DAVID LERNER ASSOCIATES, INC.
(CRD No. 5397)

and

WILLIAM MASON
(CRD No. 1093049),

Respondents.

Disciplinary Proceeding
No. 20050007427

Hearing Officer – MAD

**EXTENDED HEARING PANEL
DECISION**

April 4, 2012

Respondent David Lerner Associates, Inc. (DLA):

- **For willfully charging unfair municipal bond prices in violation of MSRB Rules G-30 and G-17, as described in the First Cause of Action, DLA is fined \$1 million and required to pay restitution to the affected municipal bond customers, plus interest.**
- **For willfully failing to record the time of receipt on municipal bond customer order tickets, in violation of MSRB Rule G-8, as described in the Second Cause of Action, DLA is fined \$25,000.**
- **For willfully failing to supervise municipal bond pricing and establish and maintain adequate procedures for municipal bonds, in violation of MSRB Rule G-27, as described in the Third Cause of Action, DLA is (1) fined \$150,000, (2) required to revise its procedures to ensure that they are reasonably designed to comply with the requirements of MSRB Rules G-30 and G-8, including but not limited to the deficiencies found in this proceeding in connection with the excessive municipal bond markups, and (3) required to retain an independent consultant to review and approve DLA's revised procedures.**

- For charging unfair CMO prices in violation of NASD Conduct Rule 2440 and IM-2440-1, and NASD Conduct Rule 2110, as described in the Fifth Cause of Action, DLA is fined \$1 million and required to pay restitution to the affected CMO customers, plus interest.
- For failing to supervise CMO pricing and establish adequate procedures to monitor the fairness of prices for CMOs, in violation of NASD Conduct Rules 3010(a) and 2110, as described in the Sixth Cause of Action, DLA is (1) fined \$150,000, (2) required to revise its procedures to ensure that they are reasonably designed to comply with the requirements of NASD Conduct Rule 2440 and IM-2440-1, including but not limited to the deficiencies found in this proceeding in connection with the excessive CMO markups, and (3) required to retain an independent consultant to review and approve DLA's revised procedures.

Respondent William Mason:

- For willfully charging unfair municipal bond prices in violation of MSRB Rules G-30 and G-17, as described in the First Cause of Action, Mason is fined \$100,000 and suspended for 6 months from associating with any member firm in any capacity.
- For charging unfair CMO prices in violation of NASD Conduct Rule 2440 and IM-2440-1, and NASD Conduct Rule 2110, as described in the Fifth Cause of Action, Mason is fined \$100,000 and suspended for 6 months from associating with any member firm in any capacity, which shall run concurrently with his suspension for the excessive municipal bond markups in the First Cause of Action.
- The Hearing Officer dissented as to the suspension imposed on Mason for the markup violations in the First and Fifth Causes of Action. The Hearing Officer would have suspended Mason from associating with any member firm in any capacity for 18 months.

The Fourth Cause of Action charging Mason with supervisory violations relating to municipal bond pricing is dismissed. The Sixth Cause of Action charging supervisory violations relating to CMO pricing is dismissed solely with respect to Respondent Mason.

Respondents are also ordered to jointly and severally pay the costs of this proceeding.

Appearances

For the Complainant: Jeffrey Pariser and Matthew D. Meisner, FINRA,
DEPARTMENT OF ENFORCEMENT, Washington, DC.

For Respondents David Lerner Associates, Inc. and William Mason: Paul J. Bazil
and Anthony W. Djinis, PICKARD AND DJINIS, LLP, and Michael G. Shannon,
THOMPSON HINE, LLP, Washington, DC.

Table of Contents

I.	Introduction.....	6
II.	Background and Procedural History.....	6
III.	Findings of Fact	11
A.	Respondents	11
1.	David Lerner Associates, Inc.....	11
2.	William Mason.....	12
B.	Municipal Bonds.....	13
1.	Available Municipal Bond Data	13
2.	Industry Pricing Practices	14
3.	Respondents' Purchases and Sales.....	15
4.	Respondents' Pricing and Markups	16
C.	CMOs.....	22
1.	Industry Pricing Practices	22
2.	Respondents' Purchases and Sales.....	25
3.	Respondents' Pricing and Markups	26
D.	Time of Receipt on Customer Municipal Bond Orders.....	33
E.	Supervision and Written Supervisory Procedures	34
1.	Municipal Bond and CMO Pricing	34
2.	Municipal Bond Order Tickets	37
IV.	Conclusions of Law	37
A.	Municipal Bond Markups	37
1.	Legal Standard	37
2.	Prevailing Market Price	38
3.	Respondents' Arguments	40
4.	Conclusion	44
B.	CMO Markups	45
1.	Legal Standard	45
2.	Prevailing Market Price	47
3.	Respondents' Arguments	47
4.	Conclusion	53
C.	Time of Receipt on Municipal Bond Customer Orders	54
D.	Supervisory Systems and Procedures	55
1.	Legal Standard	55

2.	Municipal Bonds and CMOs	55
3.	Municipal Bond Order Tickets	58
V.	Sanctions	59
A.	Municipal Bond and CMO Markups	59
1.	Sanction Guidelines	59
2.	Principal Considerations	59
3.	Conclusion	64
B.	Recordation of Time on Customer Orders	66
C.	Supervision and Written Supervisory Procedures	66
VI.	Order	69
	DISSENT	73

DECISION

I. INTRODUCTION

The Department of Enforcement (“Enforcement”) brought this disciplinary proceeding against Respondents David Lerner Associates, Inc. (“DLA”) and William Mason (“Mason”), the Head of DLA’s Fixed Income Trading Department (“Trading Department”). The case concerns Respondents’ retail sales of municipal bonds and collateralized mortgage obligation (“CMO”) securities. Municipal bonds are debt securities issued by governmental entities such as cities, counties, or states to finance capital projects and fund day-to-day obligations. CMOs, a type of mortgage-backed security, are bonds that represent claims to specific cash flows from large pools of home mortgages. Enforcement alleges that the Respondents violated certain Municipal Securities Rulemaking Board (“MSRB”) Rules, and NASD Conduct Rules and an Interpretive Memorandum, relating to the pricing of their municipal bond and CMO securities transactions. Enforcement also alleges violations relating to DLA’s municipal bond customer order tickets and Respondents’ supervisory systems and procedures.

II. BACKGROUND AND PROCEDURAL HISTORY

This disciplinary proceeding arose from Enforcement’s investigation into concerns regarding DLA’s markups on its retail sales of municipal bonds and CMOs that FINRA staff uncovered during DLA’s 2005 examination. Ultimately, Enforcement’s examination of Respondents’ municipal bond sales encompassed the period from January 1, 2005, through January 31, 2007 (the “Municipal Bond Period”), and its examination of Respondents’ CMO sales from January 1, 2005, through August 31, 2007 (the “CMO Period”). Enforcement concluded from its investigation that Respondents charged unfair

prices to their retail customers when selling municipal bonds and CMOs. Additionally, Enforcement concluded that DLA failed to record the time of receipt on numerous customer order tickets.

Enforcement filed a Complaint with the Office of Hearing Officers on May 7, 2010. Respondents filed an Answer and requested a hearing. Enforcement's Complaint contains six causes of action. In the First Cause of Action, Enforcement alleges that during the Municipal Bond Period, DLA and Mason willfully violated MSRB Rules G-30 and G-17 by charging customers unfair and unreasonable prices for municipal bonds. Enforcement alleges that, during the Municipal Bond Period, DLA acquired municipal bonds from other broker-dealers and brokers' brokers, which were purchased for DLA's inventory and then sold to DLA's customers either on the same day, or the next business day.¹ Enforcement alleges that DLA entered into more than 1,500 municipal bond transactions (the "Identified Municipal Bond Trades") in which it charged excessive markups that caused its customers to purchase the municipal bonds at prices that were not fair and reasonable, resulting in lower yields for the customers.² The charged municipal bond markups ranged from approximately 3.01% to 5.78%.³

In the Second Cause of Action, Enforcement alleges that DLA willfully violated MSRB Rule G-8 by failing to record the time of receipt on 2,307 customer municipal bond orders between April 13 and June 30, 2005.⁴

¹ Compl. ¶¶ 6, 14.

² Compl. ¶¶ 8, 12.

³ Compl. ¶ 10.

⁴ Compl. ¶ 21.

In the Third Cause of Action, Enforcement alleges that DLA willfully violated MSRB Rule G-27 by failing to supervise the conduct of its municipal bond activities and establish and maintain adequate procedures to (1) monitor the fairness of pricing for municipal bonds, and (2) ensure that it recorded the time at which its customers placed municipal bond orders.

In the Fourth Cause of Action, Enforcement alleges that Mason willfully violated MSRB Rule G-27 by failing to supervise the pricing of DLA's municipal bonds and establish and maintain adequate procedures to monitor the fairness of pricing for municipal bonds.

In the Fifth Cause of Action, Enforcement alleges that, during the CMO Period, DLA and Mason violated NASD Conduct Rule 2440 and IM-2440-1, and Conduct Rule 2110, by charging customers unfair and unreasonable prices for CMOs. Enforcement alleges that, during the CMO Period, DLA acquired CMO securities, primarily through its Florida branch office and then sold them to its customers within one business day.⁵ Enforcement alleges that DLA entered into more than 1,700 CMO transactions (the "Identified CMO Trades") in which it charged excessive markups that caused its customers to purchase the CMOs at prices that were not fair and reasonable, resulting in lower yields for the customers.⁶ The charged CMO markups ranged from approximately 4.02% to 12.81%.⁷

Lastly, Enforcement alleges in the Sixth Cause of Action that DLA and Mason violated NASD Conduct Rules 3010(a) and 2110 by failing to supervise the pricing of

⁵ Compl. ¶¶ 33, 40.

⁶ Compl. ¶¶ 35, 42.

⁷ Compl. ¶ 37.

CMOs and establish adequate systems and procedures to monitor the fairness of prices for CMOs.

The Extended Hearing Panel ("Hearing Panel"), composed of two former members of FINRA's District 10 Committee and the Hearing Officer, conducted a hearing in New York, New York from June 6 through 16, 2011.⁸ During the hearing, the Hearing Panel heard testimony from nine fact witnesses, including Mason; James Ruppert ("Ruppert"), FINRA Principal Investigator; John Hanlon ("Hanlon"), FINRA Case Manager; Albert Akerman ("Akerman"), DLA's Director of Compliance and Chief

⁸ The hearing transcript is cited as "Tr." Enforcement's exhibits are cited as "CX-," Respondents' exhibits are cited as "RX-." The parties filed joint stipulations, which are cited as "Stip." At the request of the Hearing Panel, the parties filed joint exhibits after the hearing, which are cited as "JX-1" and "JX-2." When the parties prepared JX-1, relating to the relevant municipal bonds, Enforcement identified two additional DLA "buys" for New York State Environmental Facilities Corp on May 31, 2005, which are highlighted in JX-1 between lines 445 and 446. Given that the additional buy transactions were not originally included in Schedule A to the Complaint or CX-61, the Hearing Panel will disregard this transaction. Specifically, the Hearing Panel will disregard the DLA buy on May 31, 2005, and the 16 customer buys shown on lines 446-461. The Hearing Panel also disregards those particular transactions when citing to any CX or RX exhibits that correspond to the highlighted transactions in JX-1. Therefore, the relevant Identified Municipal Bond transactions are reduced from 1538 to 1522. The restitution amount will be reduced accordingly.

When the parties prepared JX-2, relating to the relevant CMO transactions, Respondents identified two additional DLA "buys" that they argue should have been included in Schedule B to the Complaint, which relate to Federal Home Loan Mortgage, highlighted in JX-2 immediately above line 1182, and Prime Mortgage Trust, highlighted in JX-2 immediately above line 1290. The Respondents were apprised of the relevant CMO specific buy transactions in Schedule B to the Complaint and CX-62. Respondents did not raise any issue with respect to the buys associated with Federal Home Loan Mortgage and Prime Mortgage Trust at any time pre-hearing or during the hearing. In the Hearing Officer's Order, dated May 26, 2011, she ordered Respondents to review CX-62 and identify any inaccuracies before the hearing. Respondents provided information to Enforcement that reduced the number of relevant CMOs from 1817 to 1746. Respondents did not identify any issues with the buys associated with Federal Home Loan Mortgage and Prime Mortgage Trust. In fact, Respondents offered RX-16 into evidence, which is identical to Schedule B of the Complaint except that it added line numbers, and RX-16 did not include the two additional purchases that Respondents now want included. Because Respondents have identified these two additional purchases after the hearing, the Hearing Panel is not able to question any of the witnesses about them. Further, Enforcement notes that a review of CX-40 reflects that the purchases that Respondents now want included did not result in customer purchases. Rather, the two additional purchases at issue were DLA purchases that were immediately sold to another broker-dealer. For all of the above reasons, the Hearing Panel will disregard the two additional purchases highlighted in JX-2, associated with Federal Home Loan Mortgage, immediately above line 1182, and Prime Mortgage Trust, immediately above line 1290.

The Identified Municipal Bond transactions are reflected in Schedule A of this decision, which was created from JX-1, CX-61, and CX-5. The Identified CMO transactions are reflected in Schedule B to this decision, which was created from JX-2, CX-62, and CX-6.

Compliance Officer (“CCO”) during the Municipal Bond and CMO Periods; Anthony Meere (“Meere”), Branch Manager at DLA’s headquarters; Joseph DeArce (“DeArce”), Executive Vice-President of Trading for DLA’s Florida branch office; Mark Reilly (“Reilly”), registered representative with DLA’s Trading Department; Steven Sormani (“Sormani”), DLA’s CCO; and Alan Chodosh, (“Chodosh”), DLA’s Chief Financial Officer. The parties also presented expert testimony.⁹ Enforcement called James McKinney (“McKinney”), Donna Levin (“Levin”), and John Olvany (“Olvany”). Respondents called Charles C. Cox (“Cox”) and Robert Lowry (“Lowry”). The parties filed post-hearing briefs and reply briefs with the Office of Hearing Officers on August 1 and August 19, 2011.

Based upon a preponderance of the evidence, the Hearing Panel makes the following findings of fact and conclusions of law.

⁹ On December 2, 2010, the Hearing Officer granted the parties’ joint motion to present expert testimony on certain agreed upon topics.

III. FINDINGS OF FACT¹⁰

A. Respondents

1. David Lerner Associates, Inc.

DLA has been a FINRA member since 1976. DLA is headquartered in Syosset, New York,¹¹ and employs approximately 350 registered representatives.¹² It operates a total of six offices: five in the New York tri-state area (New Jersey, New York, and Connecticut) and the sixth in Florida.¹³ In the Syosset headquarters, the Trading Department is primarily a retail trading desk that focuses on the following products, with the corresponding volumes: municipal bonds (65%), CMOs (30%), and other securities (5%).¹⁴ DLA's Florida branch office has a separate trading desk from the Trading Department.¹⁵ It is responsible for its own inventory, and has its own profit and loss statement.¹⁶ During the Municipal Bond Period, the Trading Department acquired the Identified Municipal Bonds from other broker-dealers and brokers' brokers. On the other hand, during the longer CMO Period, the Trading Department acquired CMO securities

¹⁰ The facts contained herein are either undisputed or are the findings of the Hearing Panel based upon the credibility or believability of each witness. In making credibility determinations, the Hearing Panel considered all of the circumstances under which the witness testified, including: the relationship of the witness to the parties; the interest, if any, the witness has in the outcome of the proceeding; the witness's appearance, demeanor, and manner while testifying; the witness's apparent candor and fairness, or lack thereof; the reasonableness or unreasonableness of the witness's testimony; the opportunity of the witness to observe or acquire knowledge concerning the facts to which he or she testified; the extent to which the witness was contradicted or supported by other credible evidence; and whether such contradiction related to an important detail at issue. When necessary and appropriate, the Hearing Panel comments on the credibility of a witness or the weight given to a witness's testimony.

¹¹ Compl. ¶ 2; Answer at 2, 8, ¶ 2.

¹² Compl. ¶ 2; see Answer at 2.

¹³ Compl. ¶ 2; Answer at 8, ¶ 2.

¹⁴ Tr. 605.

¹⁵ Tr. 618-19.

¹⁶ Tr. 618-19, 621-23.

primarily through the Florida branch office,¹⁷ which functioned as its dealer sales liaison. The Trading Department rarely transacted CMO business with any other CMO dealers.¹⁸

2. William Mason

Respondent Mason has been in the securities industry for approximately 28 years. He entered the securities industry in 1983, and joined DLA in November 1988. He is DLA's Executive Vice President of Trading and reports directly to DLA's president, David Lerner ("Lerner").¹⁹ In addition to his registration as a General Securities Representative, Mason has been registered with FINRA as a Municipal Securities Principal since 1990, and a General Securities Principal since 1993.²⁰

During the Municipal Bond and CMO Periods, Mason was (and currently is) the Head Trader of the Trading Department.²¹ As Head Trader, Mason determined which municipal bonds and CMOs to purchase,²² and was responsible for determining the retail pricing for all of the Identified Municipal Bond and CMO Trades.²³ He was ultimately responsible for the Trading Department's profit and loss,²⁴ and was compensated based on its profitability.²⁵

¹⁷ Tr. 611-13.

¹⁸ Tr. 2271, 2603.

¹⁹ Tr. 793; CX-7, at 20; RX-47, at 12; CX-8, at 11.

²⁰ Compl. ¶ 3; Answer at 8, ¶ 3; CX-10.

²¹ Compl. ¶ 1; Answer at 8, ¶ 1.

²² Tr. 606.

²³ Tr. 604-06, 609-10; CX-7, CX-8.

²⁴ Tr. 605.

²⁵ Tr. 627-28.

Since November 1992, Mason has also been DLA's designated supervisor for the Trading Department.²⁶ In that role, he supervised and directed DLA's purchases of the Identified Municipal Bonds and CMOs,²⁷ and was responsible for reviewing and approving the prices charged to retail customers for each of DLA's relevant retail sales prior to those sales being transacted.²⁸ Mason also supervised traders and was responsible for training them.²⁹

B. Municipal Bonds

1. Available Municipal Bond Data

From January 1, 2005, through January 31, 2007, most of the Municipal Bond Period, the MSRB required brokers and dealers to report municipal bond trade data within 15 minutes of the execution of any trade.³⁰ The trade data was immediately posted and made available to the public free of charge on The Bond Market Association's website, www.investinginbonds.com,³¹ allowing for complete market transparency.³² Consequently, all market participants, including the Respondents, had access to the municipal bond prices charged by other dealers in all interdealer and customer transactions on a real-time basis.³³ During the Municipal Bond Period, municipal bond

²⁶ CX-7, CX-8.

²⁷ Tr. 604-11.

²⁸ Tr. 528-30, 567-68, 604-11.

²⁹ CX-7; Tr. 604, 610. David Lerner, the president of DLA, also relied on Mason to work with DLA's investment counselors; Mason would regularly address them at their weekly meetings. Tr. 2950.

³⁰ MSRB Notice 2005-09 (Jan. 31, 2005) at ¶ 1. MSRB required real-time trade reporting effective January 31, 2005. Prior to that time, trade data was available on a "day after the trade" or "T + 1" basis, which was standard during the first month of the Municipal Bond Period. *Id.* at ¶ 2.

³¹ Stip. ¶ 3; MSRB Notice 2005-09 (Jan. 31, 2005), at 2.

³² Tr. 273-74.

³³ CX-1, at 6.

dealers, like DLA, also could learn the prevailing markup practices of other industry participants through interactions with industry groups and regulators.³⁴

2. Industry Pricing Practices

Enforcement presented James McKinney as an expert on, among other topics, municipal bond pricing and industry practices. McKinney, a Principal and Manager at FINRA member firm William Blair & Company (“William Blair”), has approximately 40 years of experience selling municipal bonds and supervising the sale of municipal bonds.³⁵ During the Municipal Bond Period, McKinney was responsible for supervising William Blair’s municipal bond business as well as for setting the firm’s policy on markups for its retail and institutional sales.³⁶ McKinney also participated in industry roundtables, attended dealer functions, read industry publications, and talked to other municipal bond dealers on a regular basis.³⁷ Further, he participated on the FINRA Fixed Income Committee where he directly interacted with the SEC specifically regarding markup policy.³⁸

McKinney emphasized that the industry’s municipal bond markups have significantly decreased in recent years as a result of new technologies in the market and the implementation of complete market transparency.³⁹ He explained that market participants understood that municipal bond markups had to be substantially less than

³⁴ *Id.*; Tr. 278-83.

³⁵ CX-1, at 21; Tr. 265-67.

³⁶ CX-1, at 3; Tr. 266-71.

³⁷ CX-1, at 6; Tr. 278-83.

³⁸ CX-1, at 6; Tr. 279-80.

³⁹ Tr. 273-74.

5%, and that markups greater than 3% would be subject to regulatory scrutiny.⁴⁰ This understanding was made clear at industry meetings and seminars.⁴¹

To illustrate the significant decrease in municipal bond markups in the industry, McKinney explained his firm's municipal bond markup policy. At William Blair, markups on retail municipal bond transactions generally ranged from 0.25% to 2.0%,⁴² and averaged approximately 0.5% to 1.0% during the Municipal Bond Period.⁴³ Any trades with markups higher than 2% required McKinney's approval, which he gave only if extraordinary circumstances justified the 2% markup.⁴⁴ This policy applied to all retail municipal bond transactions, including small, odd-lot trades.⁴⁵

3. Respondents' Purchases and Sales

As stated above, during the Municipal Bond Period, Respondents acquired the Identified Municipal Bonds from other broker-dealers and brokers' brokers.⁴⁶ Respondents generally purchased large blocks of municipal bonds into inventory, and then DLA's investment counselors sold the bonds on the same or next day in smaller

⁴⁰ CX-1, at 17; Tr. 278-83, 473, 478-79. McKinney stated that "what's really happening, what's really happening is half a point, three quarters of a point, 1 percent, it is all the way, way below anything near 3 percent." Tr. 479.

⁴¹ Tr. 278-80. In Mason's Answer, he stated that "[t]hroughout his career, [he] has attended numerous continuing education programs, conferences, and panels organized by FINRA (and formerly NASD) for the subject of fair pricing and markups in the fixed income sphere." Answer at 4.

⁴² CX-1, at 6; Tr. 270-71.

⁴³ CX-1, at 6; Tr. 271.

⁴⁴ CX-1, at 6; Tr. 270-72.

⁴⁵ Tr. 271.

⁴⁶ Tr. 668.

blocks to retail customers.⁴⁷ At the time of the sales, all the municipal bonds were investment grade and readily available.⁴⁸ The majority of the Identified Municipal Bonds were insured bonds.⁴⁹ DLA executed all of the Identified Municipal Bond trades on a principal basis.⁵⁰ DLA had minimal, if any, loss exposure, and never incurred a loss with respect to the Identified Municipal Bond transactions at issue.⁵¹

4. Respondents' Pricing and Markups

During the Municipal Bond Period, the municipal bond market was stable; the prices of the municipal bonds at issue did not change in any meaningful way between the time of DLA's purchases and its sales.⁵² Mason set the prices, or was involved in setting the prices, that customers would pay to purchase those municipal bonds.⁵³ Mason testified that yield to the customer was the most important factor in determining municipal bond retail prices.⁵⁴ He also considered DLA's cost (i.e., its purchase price) when setting these prices.⁵⁵ When Mason purchased the municipal bonds, he used MSRB's publically

⁴⁷ CX-1, at 15-16; Tr. 605-06. DLA purchased the Identified Municipal Bonds listed in JX-1 as "DLA Buy" transactions on the "Transaction Date" and at the "Transaction Time" and for the price listed as "DLA Price" and the "Number of Bonds" indicated on JX-1 for each purchase. DLA sold to retail customers the bonds listed in JX-1 as "Cust Buy" transactions on the "Transaction Date" and at the "Transaction Time" and for the "Customer Price" and the "Number of Bonds" indicated on JX-1 for each customer purchase.

⁴⁸ Tr. 667, 2389-90, 2531-32.

⁴⁹ Tr. 334-35, 679.

⁵⁰ CX-1, at 15-16; Tr. 484-86, 605-06. The proximity of DLA's purchases and sales suggests that DLA purchased inventory in reaction to measured demand from its client base; therefore, these transactions were essentially riskless principal transactions. CX-1, at 15-16; Tr. 303-04.

⁵¹ CX-1, at 16; Tr. 398-99.

⁵² Tr. 304.

⁵³ Tr. 604-06.

⁵⁴ Tr. 661, 2413-14. The "Yield Percentage" listed in Exhibit CX-61 is the yield to the customer on the bond based on the customer price charged by Respondents, and as reported by DLA to the MSRB. Tr. 91.

⁵⁵ Tr. 673-75. Mason acknowledged that he represented in previous testimony that the first thing he would look at when setting municipal bond prices was contemporaneous cost. Tr. 695.

available data to ensure he was getting a good price.⁵⁶ However, he never utilized MSRB's data to learn (1) what other dealers charged their customers for the same bonds sold at the same time, (2) the yields received by other customers, or (3) the markups charged by other firms (by comparing customer sales prices with interdealer prices).⁵⁷ Additionally, in pricing municipal bonds for DLA's customers, Mason never attempted to determine the markups charged by other firms.⁵⁸

At DLA, the municipal bond markups typically consisted of 3 points for the investment counselor's compensation, approximately 50% of which was shared with DLA, and an additional markup by the Trading Department.⁵⁹ DLA's markups on the Identified Municipal Bonds were not disclosed to customers.⁶⁰ Additionally, DLA did not disclose the firm's purchase price or the amount of the markups for the Identified Municipal Bonds to its investment counselors.⁶¹

a. *Calculation of the Markup*

McKinney stated that, absent countervailing evidence, a firm's contemporaneous cost is the best indication of the prevailing market price of a municipal bond.⁶² He explained that the type of countervailing evidence that could justify using closer in time interdealer trades to determine prevailing market price would typically be limited to a

⁵⁶ Tr. 686.

⁵⁷ Tr. 671-73, 676-77, 686-87, 2853-59.

⁵⁸ Tr. 2853-59.

⁵⁹ Tr. 2673-76.

⁶⁰ Tr. 688, 848-49.

⁶¹ Tr. 688. Respondents compare the Identified Municipal Bonds with mutual funds; however, mutual funds fully disclose the fees and costs through the prospectus. *See infra* footnotes 245 and 246 and accompanying text.

⁶² CX-1, at 6. The appropriate methodology for calculating markup percentages on the municipal bond transactions is the price at which DLA sold the bonds to its customers minus DLA's Contemporaneous Cost, divided by DLA's Contemporaneous Cost. Tr. 302-04, 323-26; CX-1, at 15-16.

substantial block-size transaction, which could indicate that the market has changed;⁶³ closer in time odd lot transactions do not set prevailing market price.⁶⁴ Here, Respondents purchased the Identified Municipal Bonds either on the same day, or one business day before, the sales to the customers.⁶⁵ In order to confirm that the markets had not significantly moved in the short period between Respondents' purchases and their sales to customers, McKinney reviewed Respondents' trades and thousands of comparative trades in the same municipal bonds one day forward and one day back from the trade date "to get a feel for the trading climate surrounding each bond."⁶⁶ He never found any "demonstrable change in the market."⁶⁷

Enforcement calculated the Identified Municipal Bond markups by using DLA's contemporaneous cost (the price at which Respondents purchased the municipal bonds).⁶⁸ Respondents' markups ranged from 3.01% to 5.78%, irrespective of the specific characteristics of the transactions.⁶⁹ McKinney analyzed the Identified Municipal Bond trades using the municipal bond industry's publically available pricing data.⁷⁰ He compared Respondents' trades to other trades in the municipal bond industry in the same

⁶³ Tr. 323-30.

⁶⁴ *Id.*

⁶⁵ *See generally* CX-61.

⁶⁶ CX-1, at 15.

⁶⁷ Tr. 304.

⁶⁸ CX-61, CX-1, at 16. DLA's markups on the sales of municipal bonds to customers identified in JX-1, calculated based on the difference between DLA's Contemporaneous Cost and the customer price, are listed in columns identified as "Markup Percentage" and "Markup in Dollars" in CX-61.

⁶⁹ CX-61, CX-1, at 12-13; Tr. 317-19. For example, DLA sold an odd lot of 10 bonds at a 3.37% markup on the same day it sold 100 of the same bonds at a 4.39% markup. *See* CX-61, at 15, lines 606-11. Additionally, it sold 20 bonds at a 3.46% markup on the same day it sold 190 of the same bonds at a 4.23% markup. *Id.* at 9, lines 325-30. Further, the relevant transactions did not fall into a dollar amount that could justify any extraordinary markups. Tr. 317-19.

⁷⁰ CX-1, at 4.

security at approximately the same time.⁷¹ Based on his review of comparative trades in the industry, he concluded that nothing in the contemporaneous market conditions justified the markups charged by Respondents.⁷² Respondents' municipal bond prices were inconsistent with industry practices during the Municipal Bond Period.⁷³ Specifically, Respondents' markups resulted in municipal bond prices that were consistently and significantly higher than the retail prices charged by other dealers for the same bonds.⁷⁴

b. *Yield*

Based on McKinney's analysis, Respondents' municipal bond markups substantially reduced the yields received by their customers.⁷⁵ McKinney found that significant yield-stripping occurred in every trade because Respondents significantly overpriced their municipal bonds.⁷⁶ As a result of its municipal bond prices, DLA's retail customers consistently received municipal bond yields that were significantly lower in comparison to customers who held the same bonds at other firms.⁷⁷ Three examples of the Respondents' yield-stripping follow:⁷⁸

⁷¹ *Id.*

⁷² *Id.* at 7.

⁷³ CX-1, at 19; Tr. 281-83, 477-79.

⁷⁴ CX-4, CX-1, at 16. Markups by other dealers on the same bonds were considerably less than Respondents' markups. Tr. 300, 453, 488-89. Reilly, a trader in the Trading Department, also testified about a pricing example in which DLA sold a new issue at approximately 4.25 points higher than any other firm's price. Tr. 2558-61.

⁷⁵ CX-1, at 16; Tr. 306-19.

⁷⁶ CX-1, at 16.

⁷⁷ CX-4; Tr. 98-103, 299-301.

⁷⁸ The Hearing Panel identified numerous examples exhibiting the same yield-stripping and excessive markups.

(1) DLA traded in a Bridgeport, Connecticut municipal bond, CUSIP 108151G9(6), initially offered to the public on March 30, 2006, with a 4.5% coupon⁷⁹ and an August 15, 2023 maturity date.⁸⁰ DLA purchased \$150 million of this bond late in the afternoon of April 24, 2006, at a price of \$99.75 to yield 4.52%.⁸¹ On April 25, 2006, the day after its purchase, DLA sold the bonds to its customers at \$104.00, with a markup of 4.26, which reduced the yield to 4.021%.⁸² DLA's markup stripped more than 10% of the yield at the customer purchase price, reducing the yield by more than 48 basis points.⁸³ McKinney concluded that the markup should have been no more than 2.5%.⁸⁴

(2) On March 28 and 29, 2005, DLA purchased blocks of Hartford, Connecticut General Obligation Bonds, CUSIP 4164144X8(8), at a price of \$97.511, with a 4.57% coupon and an August 1, 2024, maturity date.⁸⁵ On March 29, 2005, Respondents sold these bonds to their customers at \$101.625, a markup of 4.22%, which reduced the yield to the customer from 4.57% to 4.17%, or 40 basis points.⁸⁶ The markup stripped more than 9% of the yield at the purchase price.⁸⁷ McKinney concluded that the markup should have been no more than 2.5%.⁸⁸

⁷⁹ A "coupon" signifies the annual rate of interest that the borrower promises to pay the bondholder, usually semi-annually in the case of municipal bonds and monthly in the case of CMOs. CX-49, at 108.

⁸⁰ CX-1, at 8-9 (Example 1); *see* CX-61, at 31, line 1277.

⁸¹ CX-1, at 8.

⁸² *Id.*; CX-61, at 31, lines 1277-80.

⁸³ CX-1, at 8-9.

⁸⁴ *Id.* at 9.

⁸⁵ *Id.* at 9 (Example 2); *see* CX-61, at 6, line 225.

⁸⁶ CX-1, at 9, CX-61, at 6, lines 225-26, 228-30.

⁸⁷ CX-1, at 9.

⁸⁸ *Id.*

(3) On July 6, 2006, DLA purchased Norwalk, Connecticut municipal bonds, CUSIP 6688435R(2), with a 4.50% coupon, maturing July 1, 2025, and a July 1, 2011 call date.⁸⁹ DLA's purchase price was \$98.369, with a yield to the call of 4.87%.⁹⁰ Respondents marked the bonds up by 4.58% to \$102.875, yielding 3.86% to the call.⁹¹ The markup stripped more than 100 basis points from the yield to the call.⁹² In fact, the bonds were called and were scheduled to be redeemed at \$100 on July 1, 2011.⁹³ According to McKinney, the markup should not have exceeded 2.5%.⁹⁴

c. *Expenses and Services*

DLA's expenses and services do not justify their Identified Municipal Bond markups. Respondents' presented no evidence that DLA's expenses were greater than the expenses incurred by other municipal bond or CMO dealers in the market.⁹⁵ Here, DLA's sales came from its own inventory, and there is no evidence that DLA incurred extraordinary expenses in executing or filling its customers' orders that could justify a higher markup.

There is also no evidence that the services provided by DLA to its municipal bond and CMO customers exceeded those provided by other municipal bond dealers in the

⁸⁹ *Id.* at 12; *see* CX-61, at 34, line 1405. A "callable bond" is subject to redemption prior to maturity at the option of the issuer on a specific date at a specific price. CX-49, at 108.

⁹⁰ CX-1, at 12; Tr. 312-14. "Yield to call" represents the return to a client on a bond based on existing call features, assuming that the bond will be called. CX-49, at 110.

⁹¹ CX-1, at 12; Tr. 313; CX-61, at 34, lines 1410-14.

⁹² CX-1, at 12; Tr. 314.

⁹³ CX-1, at 12; Tr. 313-14.

⁹⁴ CX-1, at 12; Tr. 314.

⁹⁵ Tr. 804-05. Mason testified that he factored DLA's expenses when pricing the municipal bonds; however, he never mentioned this factor in his Wells response. *Compare* Tr. 697 with CX-18.

market.⁹⁶ Here, the bonds were sold almost immediately by members of DLA's large sales force of investment counselors.⁹⁷ Respondents did not provide any extraordinary services that could warrant their high markups.⁹⁸

d. *A Fair Markup*

McKinney analyzed every Identified Municipal Bond trade and calculated the *highest* fair markup for each municipal bond.⁹⁹ In doing so, he allowed for a "generous markup margin [that] still keeps DLA in the very high side of the markups experienced by other participants, on the same security at the same time."¹⁰⁰ Based on McKinney's determination of appropriate, fair markups, Respondents' total excess markups were \$765,345.28 on the 1,522 Identified Municipal Bonds.¹⁰¹

C. **CMOs**

1. Industry Pricing Practices

Enforcement presented Donna Levin as one of its experts regarding CMO pricing and industry practices. Levin, a former Trader and Senior Vice-President at FINRA

⁹⁶ Tr. 802-04. The Hearing Panel did not find Mason's testimony regarding DLA's services to be credible. He had no recollection of mentioning services as a factor in his investigative testimony. Tr. 694, 745. In addition, although Mason generally claimed that he knew DLA provided a high level of service, he admitted that he was not aware of all of DLA's services or the services that other firms provided. Tr. 698-99.

⁹⁷ Respondents' Answer implied that the municipal bond and CMO sales were made on a "face-to-face" basis, but there is no evidence of any face-to-face communications concerning the customer purchases at issue in this case. Enforcement sought discovery on this issue, and the Hearing Officer ordered Respondents to produce any evidence of such face-to-face sales for the securities at issue. *See* Order Denying Respondents' Motion to Quash (Dec. 6, 2010), at 2. Respondents were directed to provide evidence of any such communications by January 10, 2011. *Id.* at 3. Respondents presented no evidence that the transactions at issue were made as a result of face-to-face meetings.

⁹⁸ Tr. 317.

⁹⁹ CX-1, at 23-26.

¹⁰⁰ CX-1, at 18. McKinney testified that, in considering Respondents' markups, he gave them "the benefit of doubt" that DLA performed a lot of customer counseling and incurred high expenses. CX-1, at 17; Tr. 317, 322-23.

¹⁰¹ CX-5, at 45. The dollar amount and number of transactions provided in CX-5 were reduced to reflect the Hearing Panel's removal of 16 transactions. *See supra* footnote 8. Other than the 16 transactions referenced in footnote 8, the Hearing Panel accepts the calculations provided in CX-5.

member firm Ferris, Baker, Watts, Inc. (“Ferris Baker”), has approximately 20 years of experience pricing CMOs for sale to retail customers.¹⁰² During the CMO Period, while Levin was employed with Ferris Baker, she was responsible for purchasing CMOs, determining the prices, setting the bids, deciding which bonds to offer, as well as educating the registered representatives.¹⁰³ Unlike the municipal bond market, the CMO market was not transparent.¹⁰⁴ However, to ensure that she priced CMOs fairly, Levin regularly obtained and reviewed CMO market information from a number of industry sources, including but not limited to: other traders, Bloomberg messages, dealer inventory screens, and Treasury yields.¹⁰⁵

Levin considered several factors for her CMO pricing methodology: expected average life of the security,¹⁰⁶ yield, price, coupon, and yield spread compared to Treasury securities of similar maturity.¹⁰⁷ Levin emphasized that when pricing CMOs it is essential to be fair to the customer.¹⁰⁸ As she explained, because CMOs have prepayment risks, it is necessary for the customers “to be rewarded for the risk that they’re taking with the uncertainty of the product.”¹⁰⁹ Levin stressed that CMO markups must take into account

¹⁰² CX-2, at 3; Tr. 1147.

¹⁰³ Tr. 1143-44.

¹⁰⁴ Tr. 729, 1764, 2614.

¹⁰⁵ Tr. 1144-50, 1173-75. Levin talked with other CMO traders on a daily basis either by phone or through Bloomberg messages. Tr. 1144-45. She reviewed dealer inventories on a dealer-by-dealer basis. Tr. 1174.

¹⁰⁶ Unlike municipal bonds, CMOs do not necessarily mature on a fixed date. Rather, the underlying borrower is a homeowner whose monthly mortgage payments typically include principal, which is paid to the CMO holder over time. CMOs are subject to significant prepayment risk because a homeowner may choose to accelerate principal payments or to refinance the mortgage and pay off the entire principal. Both of these scenarios are especially likely to occur in a declining interest rate environment. *See* CX-3, at 5-7 ¶¶ 7-8.

¹⁰⁷ CX-2, at 3-4, 25.

¹⁰⁸ Tr. 1174.

¹⁰⁹ Tr. 1151.

average life.¹¹⁰ She charged lower markups on shorter average life CMOs because markups have a greater impact on the overall yield of fixed income instruments (like CMOs) with shorter durations.¹¹¹ To prevent this adverse impact on the yield, Levin utilized a “sliding scale” approach to calculate CMO markups, adding less of a markup (in the form of sales credit) for shorter average life CMOs, and more of a markup for longer average life CMOs.¹¹² In pricing CMOs, Levin typically took a quarter of a point for her trading desk, and then applied a sales credit of *up to* 3 points.¹¹³ The 3 point sales credit would be added only to the CMOs with the longest average lives; shorter average life CMOs would get less sales credit based on Levin’s sliding scale.¹¹⁴

During the CMO Period, Levin charged markups on CMOs of less than 4% “in order to be fair to ... customers.”¹¹⁵ As she explained, very high markups significantly reduce customer yield.¹¹⁶ Because of the relatively wide spread between the bid and offer side, it would be difficult for a customer to recover a high markup if a particular CMO needed to be sold.¹¹⁷ Further, Levin noted that the high markups prevent customers from investing more principal in CMOs or other fixed income products.¹¹⁸

¹¹⁰ Tr. 1151-56.

¹¹¹ CX-2 at 5; Tr. 1151-56; *see* CX-3, at 23; Tr. 1048-51 (markups have greater impact on yield of CMOs with shorter average lives).

¹¹² Tr. 1151-56.

¹¹³ Tr. 1151-53.

¹¹⁴ Tr. 1151-52.

¹¹⁵ CX-2, at 6; Tr. 1154-55. Levin’s Report noted “a few exceptions to this practice,” but none of the noted exceptions was applicable to the Identified CMOs. CX-2, at 6.

¹¹⁶ Tr. 1155-58.

¹¹⁷ CX-2, at 6.

¹¹⁸ *Id.*

2. Respondents' Purchases and Sales

During the CMO Period, Respondents purchased close to 100% of the Identified CMOs from DLA's Florida branch office.¹¹⁹ When selling CMOs out of its inventory, the Florida branch office charged DLA's Trading Department the same price that it charged other dealers.¹²⁰ When the Trading Department requested CMOs that were not in inventory, it paid the Florida branch office a 0.25% commission for the CMOs.¹²¹ Respondents purchased the CMOs from the Florida branch office in large blocks for DLA's inventory, and then DLA's investment counselors sold them either the same day or next day in smaller blocks to customers.¹²² DLA executed all of the Identified CMO trades on a principal basis.¹²³

Each of the Identified CMOs had unique, customized features.¹²⁴ At the time of DLA's sales, all of the Identified CMOs were investment grade and readily available.¹²⁵ Because the Identified CMOs were rated AAA¹²⁶ during the relevant period, the most

¹¹⁹ Tr. 611-13. During the CMO Period, DLA purchased the CMOs indicated in JX-2 under the "DLA Purchase Information" columns on the "DLA Purchase Date" for the "DLA Purchase Price" and in the "DLA Purchase Quantity" listed in JX-2.

¹²⁰ Tr. 1938-39, 2253, 2604.

¹²¹ Tr. 623, 2253-54, 2604-07.

¹²² Tr. 606, 609-10, 616-17; CX-62; JX-2. DLA sold to retail customers the CMOs indicated in JX-2 on the "DLA Sale Date to Customer" for the "DLA Sales Price to Customer" and in the "DLA Sale Quantity" listed in JX-2. The Yield to Average Life Percentage, provided by DLA and set forth in CX-62, reflects the yield, based on the average life information available at the time, as of the time of the customer purchase. Tr. 894.

¹²³ Tr. 606, 609-10.

¹²⁴ Tr. 2028-34.

¹²⁵ CX-2, at 24; CX-3, at 9; Tr. 719, 726, 1060-61, 1181-82, 2231-33, 2601.

¹²⁶ AAA is the highest rating assigned by Moody's and S&P, credit rating agencies, which indicates that the capacity to pay interest and repay principal is extremely strong. CX-49, at 8.

significant risk was prepayment risk.¹²⁷ More than half of the Identified CMOs were support bonds,¹²⁸ a class of CMOs that are the most volatile with respect to prepayment risk.¹²⁹

3. Respondents' Pricing and Markups

During the CMO Period, the CMO market was stable; there was no evidence of market turbulence impacting interest rates or credit quality of the CMOs at issue between the time of DLA's purchase and sale of such CMOs.¹³⁰ Although Reilly, another trader in the Trading Department, assisted Mason in pricing the Identified CMOs, Mason was responsible for determining the retail pricing of all CMOs.¹³¹ Mason testified that yield to the customer was the most important factor in determining the CMO retail prices.¹³² The Trading Department's contemporaneous cost was the starting point for CMO retail pricing.¹³³ Mason based the CMO prices on the spread between the Treasury yield curve

¹²⁷ CX-3, at 6; Tr. 1011-14, 2267. Prepayment risk relates to the uncertainty regarding the timing of principal and interest payments, because homeowners may prepay some principal during the life of a loan, or refinance the entire loan, making the timing of principal payments in CMOs uncertain. CX-3, at 6; Tr. 1011-14, 2267. The prepayment risk of CMOs is particularly significant during periods of declining interest rates because homeowners frequently refinance their mortgages as interest rates go down. Reductions in interest rates also make it difficult for these investors to find opportunities to reinvest the principal from the prepayments in comparable securities at comparable yields. CX-3, at 6-7; Tr. 1014. Mason acknowledged that CMOs have prepayment risk. Tr. 722-23.

¹²⁸ CX-3, at 9.

¹²⁹ *Id.* at 8-9; Tr. 720, 1016-17; CX-49, at 110.

¹³⁰ CX-3, at 11-12; Tr. 1025. Respondents claimed that the CMO market was not stable during this period because yields on 10-year and 20-year Treasury bonds increased by more than 100 basis points in the course of a calendar year. Tr. 2292-94. However, the pertinent question is whether the market was stable when the CMOs were bought and sold, the relevant two-business-day periods at issue (i.e., were there changes in the market such that it would not be appropriate to calculate markups based on Respondents' contemporaneous cost). Respondents did not present evidence of such intra-day volatility.

¹³¹ Tr. 604-05, 609-10. In pricing CMOs, Mason could only consider information that was available to him at the time of his pricing. Tr. 778.

¹³² Tr. 727, 2277, 2611-12.

¹³³ Tr. 2609.

and the yield on the CMO being priced.¹³⁴ Mason determined the average life of a CMO by using a tool on the Bloomberg system, and then compared the yield on the CMO with a Treasury bond of a comparable life.¹³⁵ Respondents priced CMOs for retail regardless of whether the CMOs were sourced from DLA's Florida branch office or from another broker-dealer.¹³⁶

At DLA, the CMO markups typically consisted of: (1) a quarter point or other initial markup added by the Florida branch office, (2) 3 points for the investment counselors representing sales credit (approximately 50% of which went to the firm), and (3) an additional markup by the Trading Department.¹³⁷ As a result, DLA customers sometimes experienced as much as a 9.5% markup on CMOs.¹³⁸ DLA's Florida branch office never disclosed its purchase price to the Trading Department when selling CMOs out of inventory.¹³⁹ Accordingly, Respondents did not consider the additional markup charged by the Florida branch office when setting retail CMO prices.¹⁴⁰

¹³⁴ Tr. 726-27, 738. CMO yields are often quoted in relation to yields above Treasury securities with maturities closest to the estimated average life for the underlying mortgages. CX-3, at 7; Tr. 1015-16, 2279-80, 2611. This relationship is referred to by market participants as "yield spread." CX-3, at 7; Tr. 1015-16. Investors in CMOs should receive yields that are well above the yields of comparable Treasury securities to compensate them for prepayment risk due to CMOs' uncertain average lives. CX-3, at 7; Tr. 2279-80.

¹³⁵ Tr. 738-43. CMOs have a higher yield than Treasury bonds. Tr. 720-21.

¹³⁶ Tr. 2609-10.

¹³⁷ Tr. 623, 2618, 2915-20. DLA always added 3 points of sales credit. Tr. 2915-20.

¹³⁸ The Florida branch office sometimes marked up its bonds up as much as 4 points over its acquisition price before selling to the Trading Department, which, when combined with the Trading Department's additional markups, resulted in markups to DLA customers of as much as 9.5%. Tr. 2384-88, 2622-33.

¹³⁹ Tr. 2621-22.

¹⁴⁰ Tr. 2631-32.

DLA's markups on the Identified CMO sales were not disclosed to its customers.¹⁴¹ Further, DLA did not disclose the firm's purchase price or the amount of the markups for the Identified CMOs to its investment counselors.¹⁴²

a. *Calculation of the Markup*

Enforcement calculated the markups for the Identified CMOs by using DLA's contemporaneous cost (DLA's purchase price for the CMOs).¹⁴³ Enforcement used the cost at which the CMOs were acquired by DLA's Florida branch office as the cost basis rather than the price the Trading Department paid to acquire the CMOs from the Florida branch office.¹⁴⁴ The markups on the CMO transactions at issue ranged from 4.02% to 12.39%.¹⁴⁵ The median markup for the CMO transactions at issue was approximately 4.9%.¹⁴⁶

Levin analyzed Respondents' CMO trades on a trade-by-trade basis.¹⁴⁷ Her analysis involved reviewing each CMO with the available information on Bloomberg (136 CUSIPs) and calculating the expected average life at the time of purchase based on

¹⁴¹ Tr. 688, 2618. Respondents compare the Identified CMOs with mutual funds; however, mutual funds fully disclose the fees and costs through the prospectus. *See infra* footnote 291 and accompanying text.

¹⁴² Tr. 746.

¹⁴³ CX-62. DLA's markups on the sales of CMOs identified in JX-2, calculated based on the difference between "DLA Purchase Price" and "DLA Sale Price to Customer," are listed in columns identified as "Markup Percentage" and "Markup in Dollars" in CX-62. Both Levin and Olvany, Enforcement's CMO experts, concluded that contemporaneous cost was the proper measure for calculating the markups on the Identified CMOs. Tr. 1183-87; CX-3, at 11-12.

¹⁴⁴ Tr. 1386-87. The Hearing Panel finds that it is proper to calculate DLA's contemporaneous cost using the Florida branch office's purchase price. Measuring the markup using the Trading Department's purchase price from DLA's Florida branch office would not represent the firm's actual cost. Further, such a practice would enable firms, such as DLA, to falsely make their markups appear lower by buying and selling CMOs through various branch offices and thereby increasing their "cost," which would result in a lower markup.

¹⁴⁵ CX-62. The upper limit of the markup range is lower than the upper limit described in the Complaint because certain transactions were removed prior to the hearing. *See supra* footnote 8.

¹⁴⁶ CX-3, at 15.

¹⁴⁷ Levin's report provides a detailed analysis of 35 of Respondents' trades, which she selected to constitute a cross section of Respondents' CMO trades, choosing "examples that showed a variety of yields, markups, and average lives." CX-2, at 10-23.

information provided by Respondents.¹⁴⁸ Based on that average life, Levin applied her sliding scale pricing methodology to determine the CMO price.¹⁴⁹ For example, Levin considered Respondents' trades of CUSIP 94982WAV6 on March 15, 2006.¹⁵⁰ Respondents purchased the CMO for \$90, and sold it on the same day with a 6.39% markup and a price of \$95.75, resulting in a yield of 5.84% at an average life of 9.86 years.¹⁵¹ Levin determined that \$92.25, which includes a 2.78% markup, would be a fair price for this CMO, resulting in a yield of 6.34% at the average life.¹⁵² Levin stated that Respondents' markups on this CMO were "especially high," particularly "for a shorter average life CMO."¹⁵³ In each instance, Respondents' trades were at prices higher than Levin would have charged; specifically, Respondents' markups were between 19.02% and 222.64% higher than Levin's.¹⁵⁴ Levin found that Respondents' customers received "a lower return and less interest income over the life of the investment than they would have received if the markups had been more fair across-the-board."¹⁵⁵ Levin concluded that Respondents' charged excessive markups, resulting in unfair prices for its customers.¹⁵⁶

¹⁴⁸ CX-2, at 8-10.

¹⁴⁹ CX-2, at 8-10, 30-35. Levin confirmed her methodology by checking it against actual trade data from Ferris Baker. CX-2, at 5. That data, although limited, was consistent with the methodology she applied in her analysis of Respondents' trades. *Id.*

¹⁵⁰ *Id.* at 12-13 (discussing Example 6).

¹⁵¹ *Id.* at 12; see CX-62, at 9, line 412 (Respondents' sale of CMO on Mar. 15, 2006). Respondents also sold the CMO on the same day at \$95.25, and then on the next day for \$95.75 and \$95.875. CX-62, at 9, lines 413-15. All of these prices were well over Levin's highest fair markup.

¹⁵² CX-2, at 12.

¹⁵³ *Id.* at 13. Nine of the 35 trades analyzed by Levin contained similar markups. *Id.* at 10-23.

¹⁵⁴ *Id.* at 24.

¹⁵⁵ *Id.* at 23.

¹⁵⁶ Tr. 1191.

b. *Yield*

Enforcement also presented expert testimony on CMOs from John Olvany. The Hearing Panel accepted Olvany's analysis and conclusions over that of Respondents' experts for the reasons discussed below.

Olvany spent more than two decades working in global fixed income markets, including trading products such as CMOs. During the CMO Period, Olvany was a Managing Director and Senior Manager of the Institutional Sales and Trading Group for the Chicago Office at Morgan Stanley.¹⁵⁷

Olvany conducted yield spread analyses, demonstrating that Respondents' markups in the Identified CMOs were unfair.¹⁵⁸ First, he conducted a yield spread analysis in which he compared the difference in the yield spread obtained by DLA at the market price (i.e., what DLA paid for the CMO) and the yield spread obtained by Respondents' customers at the price DLA charged for the CMO.¹⁵⁹ Based on his analysis, Olvany determined that DLA's markups reduced customers' yield spreads by approximately 17.3% to 62.89% from the prevailing market price.¹⁶⁰

Second, Olvany conducted a yield spread analysis that focused on the yield spreads on support bond CMOs, which have widely variable average lives and therefore

¹⁵⁷ CX-3, at 3, 32-35.

¹⁵⁸ Olvany analyzed the 185 CMO CUSIPs at issue to develop an appropriate cross-section to sample. He selected a sample of 28 CUSIPs, including both agency and non-agency CMOs, different types of CMOs (support bonds and sequential pay bonds), and bonds with the lowest and greatest markups. CX-3, at 4-5 ¶ 6 and App. 3. Olvany then conducted a detailed review of the trades in the 28-CUSIP sample, which captured 1,014 of the total 1,817 CMO trades originally at issue. *Id.* at 4-5 ¶ 6.

¹⁵⁹ *Id.* at 26 ¶ 34 and App. 6. Investors in CMOs "are only compensated for the incremental risk of these securities relative to U.S. Treasury securities by the yield spread;" yield spread is so important that CMOs are "often quoted in relation to yields above Treasury securities with maturity closest to the CMO's estimated average life for the underlying mortgage loans." CX-3, at 7 ¶ 10, 26 ¶ 34.

¹⁶⁰ *Id.* at 26 ¶ 34 and App. 6; Tr. 1057-59.

greater prepayment risk than the other types of CMOs sold by Respondents.¹⁶¹ Olvany compared the yield spreads on support tranches of CMOs to the yield spreads for BBB corporate bonds during the relevant period because, in his experience, investors view those as comparable securities when “analyzing differences in yield spreads for alternatives to US Treasury securities.”¹⁶² Olvany’s analysis revealed that in more than 92% of the support bonds analyzed, DLA’s markups reduced its customers’ yield spreads to well below the BBB corporate yield spread.¹⁶³

Olvany concluded that “[w]ith reduction in yields of this magnitude, the customers of DLA paid unfair prices due to markups which reduced the merits of these investments.”¹⁶⁴ In sum, the yield spreads showed that Respondents charged their customers “prices that were not fair and reasonable to purchase CMOs in the Relevant Period.”¹⁶⁵

c. *Expenses and Services*

Respondents’ expenses and services do not explain their CMO prices. Respondents presented no evidence that they incurred extraordinary costs in connection with the sales of the CMOs.¹⁶⁶ They obtained widely-available, investment-grade CMOs,¹⁶⁷ and immediately sold them to their customer base. Olvany noted that he did not uncover anything to indicate that Respondents’ costs of acquiring CMOs “were excessive

¹⁶¹ CX-3, at 8-9 ¶ 14.

¹⁶² *Id.* at 27-28 ¶ 37.

¹⁶³ *Id.* at 29 ¶ 40.

¹⁶⁴ *Id.* at 26 ¶ 34. Mason stated that the yield spread for the Identified CMOs when compared to a Treasury security would have been 80 to 100 basis points. Tr. 2958-60.

¹⁶⁵ CX-3, at 10 ¶ 18.

¹⁶⁶ Meere, the branch manager for the Syosset headquarters, could not compare DLA’s expenses to other firms’ expenses. Tr. 804.

¹⁶⁷ Answer at ¶ 39 (CMOs were investment grade); Tr. 719.

or extraordinary in the Relevant Period.”¹⁶⁸ Regarding services, as with their municipal bond sales, Respondents presented no evidence that their services warranted their high markups.

d. *Pattern*

Both Levin and Olvany concluded that Respondents engaged in a consistent pattern of high markups (above 4%) that significantly reduced the yield DLA’s customers obtained.¹⁶⁹ Respondents did not differentiate between shorter and longer average life CMOs when setting markups, but rather marked up almost all of the CMOs in a similar manner.¹⁷⁰ Respondents’ markups were mostly in the 4.0% to 6.0% range, regardless of the average life.¹⁷¹ More than a quarter of the trades had markups between 4.85% and 5.05%, with virtually no variation based on average life.¹⁷²

Respondents’ failure to consider average life in their pricing was particularly unfair to customers who purchased CMOs with shorter average lives because, as discussed above, markups have a greater impact on shorter duration fixed income securities. Similarly, Respondents’ CMO prices did not vary in relation to the size of the transaction.¹⁷³ Whether a DLA customer bought as much as \$225,000 or as little as \$8,000 of a CMO, the price was marked up “without consideration for the amount of

¹⁶⁸ CX-3, at 26.

¹⁶⁹ CX-2, at 23; Tr. 1178-80; CX-3, at 26; Tr. 1057-60. Hanlon also detected a pattern with Respondents’ CMO markups. Tr. 880. Further, independent of any expert or fact witness testimony, the Hearing Panel observed a pattern with Respondents’ CMO markups.

¹⁷⁰ CX-3, at 17; CX-2, at 23; Tr. 1033-37, 1048-51, 1162-63, 1304-08, 2612-14.

¹⁷¹ CX-62; CX-3, at 17; CX-2, at 23; Tr. 1033-37, 1048-51, 1162-63, 1308.

¹⁷² CX-3, at 17 ¶ 27 and Ex. C and C-1; *see id.* at 12-13 ¶¶ 22-23 and Ex. A-1.

¹⁷³ CX-3, at 24-25 ¶ 32 and Ex. H.

money involved in the transaction.”¹⁷⁴ DLA’s markups were primarily in the 4.0% to 6.0% range regardless of the total dollar amount of the transactions.¹⁷⁵

e. *A Fair Markup*

Levin determined the *highest* fair markup that Respondents could have charged by analyzing the Identified CMOs using her sliding scale methodology.¹⁷⁶ In doing so, she acknowledged that every trading desk is slightly different.¹⁷⁷ Accordingly, Levin was generous and flexible in her analysis, utilizing a greater markup for each Identified CMO than she would have charged.¹⁷⁸ She gave Respondents “the benefit of the doubt” while still ensuring that the price was fair to the customer.¹⁷⁹ Using Levin’s determination of appropriate, fair markups, Enforcement calculated that Respondents’ total excess markups were \$692,731.24 on the 1746 Identified CMOs.¹⁸⁰

D. Time of Receipt on Customer Municipal Bond Orders

MSRB Rule G-8(a)(vii) requires firms to record the date and time of receipt for all municipal bond customer orders. DLA’s order processing system did not record the *time of receipt* for customer municipal bond orders. While DLA’s investment counselors completed order tickets when a customer purchased a municipal bond,¹⁸¹ the tickets did *not* include the time of the customer’s order.¹⁸² Once the investment counselor completed

¹⁷⁴ *Id.* at 24 ¶ 32.

¹⁷⁵ CX-3, at 24; Tr. 1059-60.

¹⁷⁶ CX-2, at 10.

¹⁷⁷ Tr. 1177.

¹⁷⁸ Tr. 1176-78.

¹⁷⁹ *Id.*; CX-2, at 10, 31-35.

¹⁸⁰ CX-6.

¹⁸¹ Tr. 511.

¹⁸² CX-12; Tr. 511-12, 812.

the order ticket, he delivered the ticket to the Trading Department for execution;¹⁸³ however, the Trading Department did not stamp the tickets either.¹⁸⁴ After execution of the order, the Trading Department sent the order tickets to the Operations Department for processing.¹⁸⁵ The Operations Department time-stamped the order tickets;¹⁸⁶ but, at times, DLA did not process (and therefore did not time-stamp) municipal bond order tickets on the same day that it received orders from its customers.¹⁸⁷ Accordingly, the time-stamp on DLA's customer municipal bond order tickets did not accurately record the time of receipt of the customer order.

In 2,307 instances between April 13 and June 30, 2005, DLA did not record the time at which the firm received customer municipal bond orders.¹⁸⁸

E. Supervision and Written Supervisory Procedures

1. Municipal Bond and CMO Pricing

DLA's written supervisory procedures ("WSPs") did not provide adequate guidance for Respondents' municipal bond and CMO pricing. Additionally, there is no evidence that Mason established or maintained any additional procedures for reviewing DLA's retail prices for municipal bonds or CMOs. Prior to May 3, 2005, DLA's WSPs did not specify that the firm must charge fair prices for its municipal securities.¹⁸⁹ Prior to the revisions in April 2006, DLA's WSPs provided only that municipal securities and

¹⁸³ Tr. 512. Trades originating in the Syosset office were physically delivered to the Trading Department. Tr. 513. Trades originating from one of DLA's branch offices were faxed to the Trading Department; however, the fax times did not reflect the time of the customer order. Tr. 246-49, 512-13.

¹⁸⁴ Tr. 785-86.

¹⁸⁵ Tr. 151-56, 513-14, 599-600, 811-12.

¹⁸⁶ Tr. 514.

¹⁸⁷ Tr. 515-17, 786-87.

¹⁸⁸ Tr. 510-15, 811-12; CX-12.

¹⁸⁹ Compare CX-7, at 14 with RX-47, at 265-266; Tr. 519-20.

other transactions needed to be approved by a Branch Manager or the Trading Department.¹⁹⁰ The WSPs did not require the Branch Manager or Trading Department to review the transactions (except for swaps); nothing in the WSPs required a review to ensure that the securities were fairly priced.¹⁹¹

DLA modified its WSPs effective April 26, 2006. The revised procedures limited the Branch Manager's approval requirement to trades of more than \$1 million in municipal bonds.¹⁹² While the WSPs required a review of municipal bond markups based on the factors set forth in MSRB Rule G-30,¹⁹³ the procedures mistakenly relied on the same factors used to review CMO markups.¹⁹⁴ The WSPs also provided for Mason, the Trading Department's "designated supervisor," to review his own markups.¹⁹⁵

Mason was not the only person required to review municipal bond and CMO transactions during the Municipal Bond and CMO Periods; the Compliance Department had a supervisory role as well.¹⁹⁶ The Compliance Department only supervised the pricing of retail municipal bonds and CMOs through periodic spot checks conducted by either the CCO or another member of the Compliance Department;¹⁹⁷ it did not generate any surveillance reports relating to the prices Respondents set for municipal bonds and CMOs.¹⁹⁸ The spot checks reviewed only trades where the markups exceeded 5% of the

¹⁹⁰ CX-7, at 14.

¹⁹¹ *Id.*

¹⁹² CX-8, at 150.

¹⁹³ *Id.* at 266-67.

¹⁹⁴ *Id.* at 281; Tr. 530-31. Among other things, IM-2440-1 provides for review of the pattern of markups; MSRB Rule G-30 does not.

¹⁹⁵ RX-47, at 265; CX-8, at 266-67; Tr. 528-30, 535-36.

¹⁹⁶ Tr. 538-45.

¹⁹⁷ Tr. 541-47, 553.

¹⁹⁸ Tr. 542-43.

prices reflected in market data.¹⁹⁹ Akerman, the Director of Compliance and later the CCO during the CMO Period, was responsible for the spot checks; however, he was not aware of the applicable market price for purposes of the CMO spot checks.²⁰⁰

DLA's spot checks did not result in any changes to the Respondents' pricing or markup practices with respect to municipal bonds or CMOs.²⁰¹ Akerman could not recall ever advising Mason that a customer purchase price he had set was too high or requiring him to provide a refund to any customer.²⁰² Further, at no time did Akerman observe any patterns with respect to Respondents' municipal bond and CMO pricing.²⁰³

Other than the Compliance Department's spot checks, Mason provided the only supervision of the municipal bond and CMO pricing. However, DLA did not provide Mason with any formal training on setting municipal bond and CMO prices.²⁰⁴ Mason could not recall receiving any case law or guidance on setting retail prices or markups from the Compliance Department,²⁰⁵ and he never approached the Compliance Department to confirm that he was properly and fairly pricing municipal bonds and CMOs.²⁰⁶ Moreover, there was no evidence that Lerner, Mason's supervisor, provided any guidance or oversight.

¹⁹⁹ Tr. 545-50.

²⁰⁰ Tr. 508-09, 545, 553-66.

²⁰¹ Tr. 550-52, 566-68.

²⁰² Tr. 550-52, 566-67.

²⁰³ Tr. 552, 567.

²⁰⁴ Tr. 639-40, 2963-64.

²⁰⁵ Tr. 642-47.

²⁰⁶ Tr. 2945.

2. Municipal Bond Order Tickets

DLA's WSPs, effective between April and June 2005, did not require the firm to record the time of customer orders.²⁰⁷ DLA had no additional procedures or supervisory systems in place to ensure that the firm recorded the time at which customers placed municipal bond orders. As discussed above, DLA's actual process for handling municipal bonds did not result in order times ever being recorded.

IV. CONCLUSIONS OF LAW

A. **Municipal Bond Markups**

1. Legal Standard

MSRB Rule G-30 requires Respondents to sell municipal bonds to customers at prices that are "fair and reasonable."²⁰⁸ The Rule provides the following relevant factors to be considered when pricing municipal bonds:

- the fair market value of the securities at the time of the transaction, in the best judgment of the broker;
- the expense involved in effecting the transaction;
- the fact that the broker is entitled to a profit; and
- the total dollar amount of the transaction.²⁰⁹

The MSRB also issued interpretive notices setting forth additional factors that may be relevant, including:

²⁰⁷ CX-7, at 14-15; *cf.* RX-47, at 159; Tr. 520-21. As noted, DLA's revised WSPs, effective April 26, 2006, required "the [T]rading [D]epartment to maintain a record of orders in municipal securities consistent with the requirements of MSRB Rule G-8." CX-8, at 266 (Section 16.6.4). However, this change did not correct the problem. The Trading Department could not have placed an accurate time-stamp showing the time of the customer order because the investment counselors did not deliver the trading ticket to the Trading Department until well after the order was placed. The modified WSPs failed to take this into account. In fact, FINRA cited DLA on this issue as recently as January 29, 2010 (for conduct through June 30, 2008). CX-52.

²⁰⁸ MSRB Rule G-30.

²⁰⁹ *Id.*

- the availability of the security in the market;
- the price or yield of the security;
- the maturity of the security; and
- the nature of the professional's business.²¹⁰

The MSRB has advised that in determining whether a municipal bond has been fairly and reasonably priced, the “most important” factor to be considered is “the resulting yield to a customer.”²¹¹

MSRB Rule G-17 requires a dealer to deal fairly with customers and not to engage in deceptive, or unfair practices.²¹² “Inherent in this responsibility is that dealers charge fair prices in transactions with their customers.”²¹³

2. Prevailing Market Price

The “key issue” in a markup case is determining the “prevailing market price” for the securities at issue.²¹⁴ It is with reference to this price that the dealer must determine the appropriate markup. “[I]n the absence of countervailing evidence, a dealer’s contemporaneous cost [of acquiring the security] is the best evidence of current market.”²¹⁵ This standard “reflects the fact that prices paid for a security by a dealer in

²¹⁰ MSRB Interpretations of Rule G-30, Report on Pricing (Sept. 26, 1980) (available at <http://www.msrb.org/Rules-and-Interpretations/MSRB-Rules/General/Rule-G-30.aspx?tab=2>) (hereinafter “MSRB Report on Pricing”) (citing prior notices dated September 20, 1977 and October 28, 1978). MSRB has stated that “[a]s a general matter, the NASD’s rules of fair practices do not apply to municipal securities transactions. Accordingly, the ‘5% policy’ does not apply to municipal securities transactions.” MSRB Report on Pricing, at n.1.

²¹¹ *Id.* at 3, ¶ 13.

²¹² MSRB Rule G-17.

²¹³ See *Dep’t of Enforcement v. SFI Invs. Inc.*, No. C10970176, 2000 NASD Discip. LEXIS 52, at *42-43 (O.H.O. Mar. 28, 2000) (citations omitted).

²¹⁴ *Orkin v. SEC*, 31 F.3d 1056, 1063 (11th Cir. 1994).

²¹⁵ See *SFI Invs., Inc.*, 2000 NASD Discip. LEXIS 52, at *43 (citing *First Honolulu Sec., Inc.*, 51 S.E.C. 695, 697 (1993)).

actual transactions closely related in time to its retail sales in the same security are normally a highly reliable indication of prevailing market price.”²¹⁶ In fact, DLA recently utilized the contemporaneous cost methodology to calculate markups of its municipal bonds in a submission to FINRA.²¹⁷

A broker’s contemporaneous cost is presumptively the fair market value, and Respondents have the burden to show otherwise.²¹⁸ Respondents did not meet this burden.²¹⁹ Here, the Identified Municipal Bond sales were very close in time to Respondents’ purchases: the sales occurred on the same day that DLA purchased the municipal bonds, or the next business day.²²⁰ Further, during the Municipal Bond Period, the municipal bond market was generally stable on a day-to-day basis.²²¹ The Hearing Panel finds that DLA’s contemporaneous cost is the prevailing market price.

²¹⁶ *Dep’t of Enforcement v. McLaughlin, Piven, Vogel Sec., Inc.*, No. C02980073, 1999 NASD Discip. LEXIS 51, at *24 (O.H.O. Dec. 1, 1999).

²¹⁷ CX-53 (DLA’s Wells Statement relating to a more recent FINRA investigation that also involved municipal bond markups).

²¹⁸ *McLaughlin, Piven, Vogel Sec., Inc.*, 1999 NASD Discip. LEXIS 51, at *25-26 (citing *LSCO Sec., Inc.*, Exchange Act Rel. No. 26779, 1989 SEC LEXIS 781, at *4 (May 3, 1989); *Charles Michael West*, 47 S.E.C. 39, 42 (1979)); *SFI Invs., Inc.*, 2000 NASD Discip. LEXIS 52, at *43.

²¹⁹ McKinney explained that large block trades that “move the market” could constitute evidence of a change in the market price; however, McKinney did not find any trades that “moved the market” between DLA’s purchase of municipal bonds and its retail sales. He explained that during the relevant period, the municipal bond market was generally stable on a day-to-day basis. Tr. 304.

²²⁰ See CX-61; JX-1.

²²¹ Tr. 304.

3. Respondents' Arguments

a. *Market Reconstruction Approach*

Respondents presented Charles Cox, a former Commissioner of the Securities and Exchange Commission ("SEC"), as their expert in municipal bonds and CMOs.²²² Cox analyzed the Identified Municipal Bonds by attempting to "reconstruct" the market.²²³ Pursuant to Cox's market reconstruction approach, Respondents' markups declined from the average of 4.19% (using contemporaneous cost) to 3.97%.²²⁴

According to Cox, markups must be calculated from the purported "market price" set by closest in time interdealer trades.²²⁵ However, Mason acknowledged that he did not adjust retail municipal bond prices in response to every move in the market.²²⁶ In fact, generally the Identified Municipal Bond prices changed very little, if at all, over the one-to-two day periods at issue in this case.²²⁷ Additionally, Cox's analysis included interdealer trades before DLA's own purchase, which itself represents an interdealer trade.

Cox also acknowledged that Respondents' market reconstruction approach depends on the application of information that Mason did not know, and could not

²²² Tr. 1416. Cox never worked in the securities industry. Tr. 1642. Cox has not traded municipal bonds or CMOs, supervised the sale of municipal bonds or CMOs, or published any articles on markups. Tr. 1639-41. In developing his opinions, Cox did not discuss with Respondents how they determined the prevailing market price for municipal bonds. Tr. 1649. Cox did not know the data that Mason relied on when he priced the municipal bonds. Tr. 1663.

²²³ See RX-3.

²²⁴ RX-57, at 6.

²²⁵ Tr. 1438, 1448-50, 1748.

²²⁶ Tr. 707-15; see, e.g., CX-61, at 1, lines 1-8, 25-34; *id.* at 13, lines 521-529; *id.* at 17, lines 671-89.

²²⁷ E.g., CX-61, at 1, lines 1-8, 25-34; *id.* at 13, lines 521-529; *id.* at 17, lines 671-89.

possibly have known, at the time he set municipal bond retail prices.²²⁸ For example, in approximately 470 of the Identified Municipal Bond trades, Cox set the “market price” of a municipal bond by using interdealer trades that occurred up to several days *after* the retail sale in question.²²⁹ Further, in approximately 99 of the Identified Municipal Bond trades, Cox determined that “market price” could be based on an interdealer trade made within 15 minutes or less of the applicable Identified Municipal Bond retail sale.²³⁰ DLA’s retail sales, which are handled by its investment counselors, could not have reflected changes in market price so quickly.²³¹

For the above reasons, the Hearing Panel finds that Respondents’ market reconstruction approach is not reliable and rejects it.

b. *Comparison of Yield to MMD Scale*

Cox also compared the yields on the Identified Municipal Bond trades to the Municipal Market Data (“MMD”) scale, a composite index that shows yields in institutional trades for bonds with various credit ratings.²³² However, Cox uniformly used

²²⁸ RX-3; Tr. 1461-63, 1649-50. Mason disparaged Respondents’ experts’ market reconstruction efforts as constituting a “backwards” looking approach that failed to take into account the reality of his daily experience. Mason testified that he “heard somebody use the term reconstruct the market and they’re trying to go backwards and look and apply different standards to what was going on at the time. . . .” Tr. 2842. The “somebody” advocating for a market reconstruction was Respondents’ expert Robert Lowry. Tr. 1865.

²²⁹ Tr. 1461-63, 1649-50; *see, e.g.*, RX-3, at 3, lines 94-111; *id.* at 6, lines 210-24; *id.* at 8-9, lines 297-310. Cox’s approach would require Mason to have known entirely *new* information by foretelling future prices for specific instruments.

²³⁰ RX-3. Cox did not determine if Respondents were aware of these trades when they priced their municipal bonds. Tr. 1665-66. In fact, he did not discuss with Respondents how they determined the prevailing market price. Tr. 1649-50.

²³¹ Any pricing changes Mason made could not affect retail trades made within 15 minutes. Once Mason changed a price, inventory sheets had to be updated and delivered to the investment counselors. Tr. 687-88. Then, an investment counselor would have to contact a customer, obtain an order, and process the order. Tr. 624 (stating bonds sold by DLA’s registered representatives). Lastly, the order would have to be reported to the MSRB, which allowed firms to report up to 15 minutes after the trade. These steps could not all occur within 15 minutes.

²³² Tr. 1685. Cox learned about the MMD scale from Respondents’ counsel. Tr. 1688.

the wrong MMD scales; he failed to recognize that the majority of the relevant municipal bonds were insured.²³³ McKinney explained that Cox's reliance on the wrong MMD scales was fatal to his analysis because there are significant differences in the yields for "natural" bonds²³⁴ and bonds that have the same credit rating because of insurance.²³⁵

The Hearing Panel rejects Respondents' comparison to the MMD composite index, and finds that the best comparison for the yields on the Identified Municipal Bonds is the yields provided to the MSRB from other brokers for those specific bonds.²³⁶

c. Application of DBCC v. David Lerner Associates

Respondents also assert that they relied on *DBCC v. David Lerner Associates*, a FINRA decision issued in 1981 (the "1981 case") where DLA was successful in defending unfair municipal bond pricing allegations, as a standard for measuring municipal bond markups.²³⁷ Specifically, Respondents contend that the 1981 case set a "40 basis point standard" – as long as the yield to a customer was within 40 points of the yield at which DLA bought the bond, the trade was fair.²³⁸

²³³ CX-10; Tr. 1689-98. Cox admitted that he was unfamiliar with the MMD scale prior to working on his report in this proceeding. Tr. 1687-88.

²³⁴ "Natural" bonds are rare, premiere bonds that do not rely on insurance for their rating. Tr. 334-35. DLA did not sell "natural" triple A bonds. Tr. 334.

²³⁵ Tr. 337-42. An insured bond could have a single A underlying rating but with the added insurance, it is rated triple A. Tr. 335.

²³⁶ Cox never looked at the MSRB's data. Tr. 1682-84.

²³⁷ Respondents' assertion that they relied on the 1981 case when setting the Identified Municipal Bond prices lacks credibility. During Mason's investigative testimony, he was questioned about all the factors he relied upon when setting municipal bond prices; yet, he never mentioned anything about the 1981 case. Tr. 666-67. At the hearing, Mason claimed that he had heard about the 1981 case approximately five times, including early in his career at DLA; however, prior to this hearing, he never read the entire case or reviewed the schedule of trades attached to the decision. Tr. 648, 665-66. Similarly, Reilly, a trader in the Trading Department, never mentioned the 1981 case during his investigative testimony, when asked if he used any guidelines when setting municipal bond prices. Tr. 2538-45. Respondents also failed to mention the 1981 case in their Wells letters when responding to: (1) FINRA's concerns in this case; (2) multiple additional FINRA inquiries; and (3) Wells letters regarding other municipal bond pricing. See CX-18, CX-19, CX-37, CX-45, CX-53.

²³⁸ RX-57, at 10; Tr. 1503-04.

The Hearing Panel rejects Respondents' application of the 1981 case. First, the 1981 case did not create an industry "standard." Prior to being retained by Respondents, their expert Cox acknowledged that he had never heard of the 1981 case.²³⁹ Second, the municipal bond market is vastly different now than it was in 1981.²⁴⁰ Yields in 1981 were nearly twice as high as those during the Municipal Bond Period.²⁴¹ The bond market now is transparent, and such transparency has driven down markups.²⁴² Third, during the Municipal Bond Period, DLA's Compliance Department should have been aware that since 1981 even markups lower than those at issue have been found to be excessive.²⁴³ Fourth, while Mason stated that he relied on the 1981 case, he admitted that he never read it or reviewed the markup schedule attached to the case.²⁴⁴ In conclusion, the Hearing Panel finds that DLA's 1981 "standard" could not reasonably be relied on between 2005 and 2007.

²³⁹ Tr. 1715-16.

²⁴⁰ Tr. 273-74, 283-93, 297-98; 1816-18.

²⁴¹ The bonds at issue in 1981 had yields ranging from approximately 7% to 10%, with most in the 8% to 9% range. Tr. 291; RX-5, at 8-16. In contrast, most of the relevant bonds in this proceeding traded at yields in the 4.5% to 5% range. Tr. 292-93, 297-98; See CX-1, at 8-15. A 40 basis point yield reduction would have a commensurately greater impact on yield today: a 40 basis point reduction from the 1981 yield of 8% to 7.60% is a 5% reduction in yield to the customer; in contrast, a 40 basis point reduction from the 2005 yield of 4.5% slashes the yield by almost 9%. As such, DLA's "standard" has a much more severe impact when it is applied to bonds with lower yields. Both Mason and Cox lacked credibility when responding to questions regarding the impact of 40 basis points as applied to bonds with lower yields. Both contended, essentially, that "40 basis points is 40 basis points." Tr. 664-65; 1723-24.

²⁴² Tr. 273-74. Mason acknowledged that, unlike in 1981, the bond market now is transparent. Tr. 634-35.

²⁴³ See, e.g., *Mark David Anderson*, 56 S.E.C. 840 (2003) (finding municipal bond markups ranging from 1.87% to 5.64% and CMO markups ranging from 1.42% to 4.04% to be excessive); *Dist. Bus. Conduct Comm. v. Mid-State Sec. Corp.*, 1989 NASD Discip. LEXIS 58, at *12-13 (Aug. 8, 1989) (NASD Board of Governors affirming finding of District Committee that municipal bond markups ranging from 2.4% to 4.4% were "not fair and reasonable considering all relevant factors").

²⁴⁴ Tr. 648, 665-66.

d. *Comparison to Mutual Fund Loads*

Cox also contended that Respondents' markups compared favorably to mutual fund loads.²⁴⁵ The Hearing Panel rejects the comparison of these two different products. Notably, mutual fund loads are disclosed to customers whereas Respondents' markups were not.²⁴⁶

e. *Exceptional Services*

Finally, Respondents contended that the municipal bond markups were justified based on the exceptional services they provided. As stated above, there is no evidence that services provided by DLA to its municipal bond and CMO customers were superior to those provided by other municipal bond dealers in the market.²⁴⁷ Plus, the municipal bonds at issue were purchased and sold within a very short time period, at times within hours.²⁴⁸ While Mason claimed to have factored DLA's services into his pricing, he admitted he was not aware of all the services DLA provided or the services provided by other firms.²⁴⁹ Accordingly, the Hearing Panel finds that Respondents' markups are not justified by their asserted "exceptional services."

4. Conclusion

The Hearing Panel accepted McKinney's analysis over that of Respondents' experts for the reasons discussed above. The Hearing Panel finds that the Identified

²⁴⁵ Tr. 1533-35; RX-57, at 10-13. In Respondents' Wells submission, they never sought to justify their markups based on a comparison to mutual funds. CX-18, CX-19.

²⁴⁶ Tr. 319.

²⁴⁷ Tr. 802-04. Respondents' expert Cox conducted no investigation of DLA's services relative to other dealers' services. Tr. 1701-02. The Hearing Panel did not find Mason's testimony regarding DLA's services to be credible. *See supra* footnote 96. McKinney testified that William Blair provided the same types of services as DLA; yet, its markups are far lower. Tr. 274-76, 317.

²⁴⁸ *See, e.g.*, JX-1, at 1, lines 1-6 (DLA purchases at 11:19 and sells to customers at 14:43), *id.* at lines 25-26 (DLA purchases bonds at 10:03 and sells to customers at 12:54).

²⁴⁹ Tr. 698-99.

Municipal Bond prices were unfair and that Respondents' markups were excessive.

While DLA is entitled to a profit, Respondents did not present any evidence that their excessive markups were necessary for DLA to earn a profit. In fact, the Trading

Department never had an unprofitable month during the Municipal Bond Period.²⁵⁰

Respondents knew how the market was pricing the bonds sold to their customers, but chose to charge their customers unfair prices that were much higher than those charged by other market participants, resulting in lower yields for their customers. Accordingly, the Hearing Panel finds that Respondents violated MSRB Rules G-30 and G-17, as alleged in the First Cause of Action.

A finding of willfulness does not require a determination that Respondents intended to violate FINRA's or MSRB's rules.²⁵¹ Rather, the Hearing Panel need only find that Respondents voluntarily committed the act that constituted the violation,²⁵² i.e., charging unfair prices on the Identified Municipal Bonds. Accordingly, the Hearing Panel finds that Respondents' conduct was willful.

B. CMO Markups

1. Legal Standard

NASD Conduct Rule 2440 requires Respondents to sell securities to their customers "at a price which is fair, taking into consideration all relevant circumstances." Under the Rule, relevant circumstances include: (a) market conditions with respect to such security at the time of the transaction; (b) the expense involved; and (c) the fact that the broker is entitled to a profit.

²⁵⁰ Tr. 628. Most of the Trading Department's profit came from retail sales. *Id.*

²⁵¹ *Dep't of Enforcement v. Kraemer*, No. 2006006192901, 2009 FINRA Discip. LEXIS 39, at *16 (N.A.C. Dec. 18, 2009).

²⁵² *Id.*

NASD's markup policy, IM-2440-1, states that "[i]t shall be deemed a violation of [NASD] Rule 2110 and Rule 2440 for a member to enter into any transaction with a customer in any security at any price not reasonably related to the current market price of the security or to charge a commission which is not reasonable."²⁵³ The markup policy originates from the fundamental principle that, in dealings with its customers, a securities dealer impliedly represents that it will deal with them honestly and fairly and in accordance with the established standards of the business, which representation is rendered false when the dealer charges prices not reasonably related to the prevailing market prices without disclosing that fact.²⁵⁴ The policy likewise incorporates the long-held standard that "any person, regardless of his knowledge of the market or his access to market information, is entitled to rely on the implied representation, made by a registered dealer in securities, that customers will be treated fairly."²⁵⁵

IM-2440-1 sets forth some additional factors that "should" be taken into consideration in determining the fairness of Respondents' markups. Those factors are: (1) the type of security involved; (2) the availability of the security in the market; (3) the price of the security; (4) the amount of money involved in the transaction; (5) disclosure; (6) the pattern of markups; and (7) the nature of the member's business.²⁵⁶ "While each transaction must meet the test of fairness, the Board believes that particular attention

²⁵³ IM-2440-1.

²⁵⁴ See, e.g., *Charles Hughes & Co., Inc. v. SEC*, 139 F.2d 434, 437 (2d Cir. 1943). According to the shingle theory, a broker-dealer impliedly represents at the outset of a securities transaction that it will deal with its customers fairly and in accordance with the standards of the industry. *Duker & Duker*, 6 S.E.C. 386, 388-89 (1939).

²⁵⁵ *United Sec. Corp.*, 15 S.E.C. 719, 727 (1944).

²⁵⁶ IM-2440-1(b).

should be given to the pattern of a member's mark-ups."²⁵⁷ As the SEC explained, a pattern of high markups establishes a *prima facie* case of improper markups.²⁵⁸

2. Prevailing Market Price

IM-2440(a)(3) provides that "[i]n the absence of other bona fide evidence of the prevailing market, a member's own contemporaneous cost is the best indication of the prevailing market price of a security." As with municipal bonds, Respondents must overcome the presumption that the CMO markups should be calculated based on the firm's contemporaneous cost. Although DLA contends that the application of contemporaneous cost is inappropriate, DLA used contemporaneous cost to calculate CMO markups when responding to an SEC inquiry regarding CMO markups, most of which are the Identified CMOs at issue in this case.²⁵⁹ Here, the retail CMO sales occurred within one business day of DLA's purchase of the Identified CMOs. The Hearing Panel finds that DLA's contemporaneous cost (i.e., the firm's purchase price) is the best indicator of the prevailing market price.

3. Respondents' Arguments

a. *Market Reconstruction Approach*

Respondents' claim that their CMO markups were appropriate relies in significant part on their lower calculation of markups, based on their "reconstruction" of the CMO

²⁵⁷ IM-2440-1(b)(6)

²⁵⁸ *Inv. Planning, Inc.*, 51 S.E.C. 592, 596 n.19 (1993).

²⁵⁹ DLA created RX-59 in response to CX-66, an SEC request, dated November 20, 2007, seeking information regarding DLA's markups on CMO retail trades between January 1, 2006 and August 31, 2007, which constitute most of the Identified CMO markups. When the SEC requested that DLA calculate its markups, DLA used its contemporaneous cost. Tr. 1381-87.

market.²⁶⁰ Using their CMO market reconstruction approach, Respondents calculated the markups for approximately 726 of the Identified CMO trades (approximately 42%). For the remaining CMO trades, where there was no evidence of any relevant interdealer trades in the CMO CUSIPs at issue,²⁶¹ Respondents added an “imputed market maker’s spread” of 0.67% to DLA’s contemporaneous cost, and argued that the resulting sum is the market price against which the markups should be measured.²⁶² The Hearing Panel finds Respondents’ market reconstruction approach unreliable and rejects it for several reasons.

First, their CMO market reconstruction contains many of the same problems as their municipal bond market reconstruction. For example, it relies on interdealer trades that occurred *after* the retail sales, which Mason could not have known when pricing the Identified CMOs.²⁶³ Further, because the CMO data contains only the date, without the specific time of the trade,²⁶⁴ it is not possible to determine the sequence of several trades executed on a particular day.²⁶⁵

²⁶⁰ RX-24. Respondents’ “reconstruction” is based on trading data provided by approximately 80 firms chosen by Respondents. The Hearing Officer granted Respondents’ request to obtain interdealer trading data from 80 firms. *See* Order Granting Respondents’ Rule 9252 Request and Directing Enforcement to Issue Rule 8210 Requests, dated Feb. 23, 2011. Respondents’ request was not limited in any manner. *Id.*

²⁶¹ In approximately 1,020 of the 1,746 Identified CMO trades, there were no interdealer traders (at DLA or away from DLA) between the time of DLA’s purchase and DLA’s sale of the CMO at issue. Tr. 904-06, 1755-56. In approximately 200 of the CMO trades, there were no interdealer trades (at DLA or away from DLA) at prices higher than DLA’s contemporaneous cost between the time of DLA’s purchase and DLA’s sale. Tr. 905-06; CX-40.

²⁶² Tr. 1765. Cox did not rely on any information from Mason when determining whether to apply the “imputed market maker spread.” Tr. 1766. Mason disagreed with Respondents’ experts’ application of the “imputed market maker spread.” Tr. 2949-50.

²⁶³ Tr. 777-78.

²⁶⁴ Tr. 2064.

²⁶⁵ Tr. 761.

Second, unlike the municipal bond market, the CMO market is not even partially transparent. Accordingly, Mason could not have known about any of the trades, other than the Trading Department's purchases.²⁶⁶ Cox's methodology utilized interdealer trades regardless of whether Mason was aware of them at the time.²⁶⁷

Third, Cox did not consistently apply his methodology. When Cox encountered closer in time interdealer trades at prices less than or equal to DLA's acquisition cost (i.e., contemporaneous cost), he ignored them and instead applied the imputed market maker spread of 0.67, which resulted in lower markup calculations.²⁶⁸

Lastly, Respondents' "market reconstruction" approach relies on the incorrect assertion that DLA was a market maker in CMO securities.²⁶⁹ Respondents' expert Robert Lowry testified that DLA was a market maker in CMOS.²⁷⁰ Lowry justified his assertion that DLA is a "market maker in CMO securities" on the ground that the firm bought and sold many CMOs on an interdealer basis during the relevant period.²⁷¹ However, firms make markets in *particular* securities, not entire categories of securities. The Securities Exchange Act of 1934 ("Exchange Act") defines a market maker as one who "with

²⁶⁶ While Mason testified that he could know about interdealer trades even though DLA did not participate in them, he did not change the Identified CMO prices in response to interdealer trades. Tr. 755; *compare* CX-62, at 2, lines 46-63 *with* CX-40, at 2; *compare* CX-62, at 3-4, lines 135-177 *with* CX-40, at 5.

²⁶⁷ Tr. 1764-65.

²⁶⁸ Tr. 1780-88; *compare* RX-17 *with* CX-62 and CX-6.

²⁶⁹ Tr. 2024. The Hearing Panel finds that Respondents asserted market maker status lacks credibility. Presumably, had DLA been a market maker, Respondents would have notified FINRA (in their Wells response in this case) and the SEC (when responding to an SEC inquiry on August 17, 2009 regarding DLA's CMO pricing) of their market maker status. They did not do so. *See* CX-50, at 2; CX-18, at 20; CX-19. Akerman, DLA's CCO, authored the SEC response and testified that he intended the letter to be "accurate and thorough." Tr. 570-71. In preparing the SEC response, Akerman consulted with the relevant DLA employees, including Mason. Tr. 570.

²⁷⁰ Lowry worked at the SEC until 1995. He worked in the securities industry for one year between 1995 and 1996; however, he never obtained his registrations. Tr. 1974-76. His employment in the securities industry was unrelated to CMO sales to retail customers. Tr. 1977.

²⁷¹ Tr. 2032-33 (DLA's market maker status based on the "overall characteristics of the office").

respect to *a security*, holds himself out (by entering quotations in an interdealer communications system or otherwise) as being willing to buy and sell *such security* for his own account on a regular or continuous basis.”²⁷² Accordingly, Respondents must demonstrate market maker status on a CMO-by-CMO basis.

While Lowry admitted that, in order to determine whether DLA was a market maker, one would have to look at each CMO CUSIP and determine the trading activity in that particular CMO,²⁷³ he never conducted such an analysis. Lowry acknowledged that every CMO is unique and has its own characteristics,²⁷⁴ but his analysis ignored that fact and he failed to conduct the security-by-security analysis as required by the Exchange Act. In fact, Respondents failed to show that DLA was a market maker in even one of the specific relevant CMO CUSIPs. Instead, Lowry’s analysis aggregated CMOs traded by Respondents on an issuer-by-issuer basis, without regard to the characteristics of the CMOs. For example, Lowry’s analysis included many CMOs issued by Countrywide; however, he analyzed them as if they were all the same security.²⁷⁵

Lowry admitted that he had never before deemed a firm to be a market maker in CMOs. Indeed, Respondents have not cited any reported decision that has ever held a firm to be a market maker in CMOs generally or in any particular CMO. A market maker is required to buy at its stated bid price and sell at its stated offer price. In contrast, DLA’s CMO trader, DeArce, testified that he bought CMOs from other dealers at his bid price only when he was able to do so; if he could not get the CMO at his bid, he simply

²⁷² Section 3(a)(38) of the Securities Exchange Act of 1934 (emphases added).

²⁷³ Tr. 2031.

²⁷⁴ Tr. 2028-34.

²⁷⁵ See RX-22 (many different CMOs issued by Countrywide were analyzed as if they were all the same security even though any given issuer sold a wide variety of CMOs, with varying characteristics and maturities).

did not buy it.²⁷⁶ Further, in a two-sided market, a market maker must show both its bid and its offer prices. However, DLA never showed both its bid and offer prices at the same time.²⁷⁷ In addition, registration is required for market makers whereas there is no such market maker registration for CMOs.²⁷⁸ Simply put, the traditional hallmarks of a market maker are not present here.

b. *5% Policy*

Respondents contend that markups under 5% complied with FINRA's "5% Policy" and thus were fair.²⁷⁹ The Hearing Panel rejects this argument. At the outset, IM-2440 clearly states that the 5% Policy "is a guide, not a rule"²⁸⁰ and that "[a] mark-up pattern of 5% or even less may be considered unfair or unreasonable under the '5% Policy.'"²⁸¹ For example, as Levin noted, no one could reasonably claim that a 5% markup on a Treasury bond would be fair.²⁸² Levin explained that she would never have added such a high markup to a CMO,²⁸³ and, for the Identified CMOs, a 5% markup (or even a 4% markup) was simply unfair.²⁸⁴ Indeed, prior to the CMO Period, the SEC found CMO markups ranging from 1.42% to 4.04% to be excessive.²⁸⁵

²⁷⁶ Tr. 2209-11.

²⁷⁷ Tr. 2211-13.

²⁷⁸ Tr. 1123 (no "list of market makers" on Bloomberg). In addition, DLA's confirmation statements did not identify it as a market maker. RX-18A; Tr. 771.

²⁷⁹ Respondents' argument that they set their prices to comply with the 5% Policy is not credible because many of the Identified CMOs markups greatly exceeded 5%. See CX-62.

²⁸⁰ IM-2440-1(a)(1).

²⁸¹ IM-2440-1(a)(4).

²⁸² Tr. 1193-94.

²⁸³ *Id.*

²⁸⁴ Tr. 1178-80.

²⁸⁵ *Mark David Anderson*, 56 S.E.C. at 852, 860-62.

Plus, the determination of whether a markup is fair is based on “all the relevant factors, of which the percentage of mark-up is only one.”²⁸⁶ Respondents’ argument fails to consider the type of security involved. For a CMO, which is akin to a bond, the markup would typically be lower than the markup on, for example, shares of common stock.²⁸⁷

c. *Comparison to FINRA/ Bloomberg Corporate Bond Index*

Respondents also rely on Cox’s comparison of their CMO yields to the FINRA/Bloomberg Corporate Bond Index (“Bond Index”).²⁸⁸ However, the Identified CMOs are not comparable to the Bond Index. The securities in the Bond Index are principally corporate bonds with ratings of AA or A. As Olvany explained, the Identified CMOs are primarily support and sequential pay bonds (177 of the 185 relevant CMOs), which have greater risk due to their relatively volatile prepayment speeds.²⁸⁹ While the remaining eight CMOs were “PAC” bonds, which Olvany acknowledged were comparable to the bonds in the Bond Index, they represented a small fraction of the Identified CMOs. Accordingly, the majority of Cox’s comparison did not account for the fact that the yields on the Identified CMO trades should have been significantly higher than the Bond Index yields.²⁹⁰ For the above reasons, the Hearing Panel finds that Cox’s comparison is unreliable.

²⁸⁶ IM-2440-1(a)(5).

²⁸⁷ See IM-2440-1(b)(1). DLA offered only the top of the line and most conservative CMOs. Tr. 719.

²⁸⁸ Tr. 1620; see RX-57, at 21-22.

²⁸⁹ Tr. 1076.

²⁹⁰ Mason acknowledged that he never priced CMOs based on the Bond Index. Tr. 749. Neither did Levin. Tr. 1194.

d. *Comparison to Mutual Fund Loads*

Cox made the same mutual fund load comparison as he did for municipal bonds. In contrast to mutual funds, DLA never disclosed the markups on its CMOs.²⁹¹ The Hearing Panel rejects this argument based on the differences between the products.

e. *Exceptional Services*

As with the municipal bonds, Respondents contend that their markups were justified by the services they provided. The Hearing Panel rejects this argument for the same reasons delineated in the above section on municipal bonds. Further, as Levin explained, DLA provided “standard services that all” brokers provide.²⁹²

4. Conclusion

The Hearing Panel accepted Levin’s and Olvany’s analysis over that of Respondents’ experts for the reasons discussed above. The Hearing Panel also considered the relevant factors in NASD Conduct Rule 2440 and IM-2440-1 and concluded that Respondents charged unfair prices on the Identified CMOs. The CMOs were readily available in the market. Respondents’ markups exhibited a pattern; the markups were primarily in the 4.0% to 6.0% range regardless of the specific characteristics of the transactions or the type of security. By charging unfair CMO prices, which were not disclosed, Respondents significantly reduced the yields for their customers. While Respondents are entitled to a profit, they did not present any evidence that their excessive markups were necessary for DLA to earn a profit.²⁹³ Further, nothing in the nature of DLA’s business entitled Respondents to charge high markups. The Identified CMO

²⁹¹ Tr. 688, 746, 2618.

²⁹² Tr. 1178.

²⁹³ The Trading Department never had an unprofitable month during the CMO Period. Tr. 628.

prices were unfair and Respondents' markups were excessive. Accordingly, the Hearing Panel finds that Respondents violated NASD Conduct Rule 2440 and IM-2440-1, and NASD Conduct Rule 2110, as alleged in the Fifth Cause of Action.

C. Time of Receipt on Municipal Bond Customer Orders

MSRB Rule G-8(a) lists certain "books and records required to be made" by brokers and dealers of municipal securities. Rule G-8(a)(vii) requires, "in the event such purchase or sale [of municipal securities] is with a customer, a record of the customer's order, *showing the date and time of receipt*" of the order and additional information."²⁹⁴ This requirement "is designed to allow the dealer and the appropriate examining authority to determine whether the dealer has complied with rule G-18, on execution of transactions, and rule G-30, on pricing," because those rules require dealers to charge customers fair and reasonable prices, taking into account, among other things, "the market value of the securities at the time of the transaction."²⁹⁵

DLA failed to comply with the requirement in 2,307 instances between April 13 and June 30, 2005.²⁹⁶ Accordingly, DLA violated MSRB Rule G-8. Applying the above standard for willfulness, the Hearing Panel finds that DLA's violation was willful.²⁹⁷

²⁹⁴ MSRB Rule G-8(a)(vii) (emphasis added).

²⁹⁵ MSRB Interpretive Letters on Rule G-8, Interpretation of April 20, 1987 ("Time of receipt and execution of orders"); available at www.msrb.org/Rules-and-Interpretations/MSRB-Rules/General/Rule-G-8.

²⁹⁶ CX-12.

²⁹⁷ See *supra* footnotes 251 and 252 and accompanying text (discussing standard for finding of willfulness).

D. Supervisory Systems and Procedures

1. Legal Standard

“Assuring proper supervision is a critical component of broker-dealer operations.”²⁹⁸ MSRB Rule G-27 requires Respondents to “establish and maintain a system to supervise the municipal securities activities of each registered representative, registered principal, and other associated person that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable Board rules.”²⁹⁹ NASD Conduct Rule 3110(a) is nearly identical to MSRB Rule G-27, and requires Respondents to establish a “system to supervise the activities of each registered representative, registered principal, and other associated person that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable NASD Rules.”³⁰⁰ The standard of “reasonableness” is determined based on the particular circumstances of each case.³⁰¹ A violation of Conduct NASD Conduct Rule 3110 also is a violation of NASD Conduct Rule 2110, which requires member firms to observe high standards of commercial honor and just and equitable principles of trade.³⁰²

2. Municipal Bonds and CMOs

DLA’s supervisory system for its municipal bond and CMO pricing was inadequate on several levels. At the outset, DLA designated Mason as the supervisor for the Trading Department, which resulted in self-supervision as Mason reviewed his own

²⁹⁸ *Richard F. Kresge*, Exchange Act Rel. No. 55988, 2007 SEC LEXIS 1407, at *27 (June 29, 2007).

²⁹⁹ MSRB Rule G-27(b).

³⁰⁰ NASD Rule 3010(a).

³⁰¹ *See, e.g., Christopher Benz*, 52 S.E.C. 1280, 1284 (1997) (citing *Consol. Inv. Servs., Inc.*, 52 S.E.C. 582 (1996)).

³⁰² *Ronald Pellegrino*, Exchange Act Rel. No. 59125, 2008 SEC LEXIS 2843, at *33 (Dec. 19, 2008) (citation omitted); *Dep’t of Enforcement v. Midas Securities, LLC*, No. 2005000075703, 2011 FINRA LEXIS 71, at *22-23.

markups.³⁰³ DLA also failed to provide Mason with (1) any formal training on pricing municipal bonds or CMOs and (2) relevant markup case law. Further, Mason's compensation depended in part on the revenue generated by the Trading Department, so he had a financial incentive to set the highest prices possible in order to boost revenues. While Mason testified that Lerner, DLA's president, was his supervisor,³⁰⁴ there is no evidence that Lerner supervised Mason during the relevant periods. Left unsupervised, he overcharged customers. DLA also profited from Mason's unfair prices. Simply put, DLA failed to properly supervise Mason's municipal bond and CMO pricing.

As demonstrated above, the Identified Municipal Bond and CMO sales were at unfair and excessive prices, and violated MSRB Rule G-30 and NASD Conduct Rule 2440 and IM-2440-1, and NASD Conduct Rule 2110. DLA's investment counselors utilized Respondents' unfair prices when selling the municipal bonds and CMOs to DLA's customers. In comparison to the publicly available MSRB data, Respondents' prices signaled a red flag because they were significantly higher than other industry participants. Although the CMO market lacked the transparency of the municipal bond market, there was other information, such as yield spread data, to enable Respondents to properly supervise their CMO pricing and ensure their customers were charged fair prices. Respondents knew, or should have known, that the markups set on CMOs of shorter duration would have a greater impact on yield than equivalent markups on CMOs of longer duration. Respondents ignored the market information and set markups very close to 5%, regardless of the security or the relevant market conditions.

³⁰³ The SEC has consistently recognized that a registered representative cannot supervise his own activities. See, e.g., *Harry Gliksmann*, 54 S.E. C. 471, 485 (1999), *aff'd*, 24 F. App'x 702 (9th Cir. 2001); *Bradford John Titus*, 52 S.E.C. 1154, 1158 (1996).

³⁰⁴ Tr. 793.

DLA's Compliance Department played a limited and ineffective role in reviewing municipal bond and CMO pricing. DLA's Compliance Department did not generate any surveillance reports relating to the Identified Municipal Bonds and CMOs. While it conducted periodic spot checks of the trades, it limited its review to trades with markups that were more than 5% above market price.³⁰⁵ Given that a markup need not exceed 5% in total markup to be unfair to customers, spot checking prices where the markup was greater than 5% resulted in a review of only a sample of the most egregiously priced trades. Indeed, many of the unfair Identified CMO trades had markups under 5%. Moreover, because the Compliance Department's review was a periodic spot check many trades with markups higher than 5% above the market price were never reviewed at all.³⁰⁶

Lerner was responsible for supervising DLA's policies and procedures.³⁰⁷ During the relevant period, DLA, through Lerner, failed to ensure that the firm had adequate policies and procedures. Ninety-five percent of the Trading Department's business related to municipal bonds and CMOs;³⁰⁸ yet, DLA's WSPs were not reasonably designed to supervise Respondents' municipal bond and CMO pricing and ensure compliance with the applicable regulations. As discussed above, DLA's procedures were inadequate in a number of ways, including, but not limited to: (1) the designation of Mason as the supervisor of the Trading Department, (2) the utilization of the incorrect factors to review CMOs, and (3) for at least part of the review periods, the failure to require the firm to charge "fair" prices to customers.

³⁰⁵ Tr. 545-46, 553.

³⁰⁶ Tr. 545-46, 553.

³⁰⁷ RX-47, at 11; CX-8, at 11.

³⁰⁸ Tr. 605.

The Hearing Panel finds that DLA willfully failed to supervise its municipal bond pricing and establish reasonable procedures to monitor the fairness of the municipal bond pricing, in violation of MSRB Rule G-27, as described in the Third Cause of Action.³⁰⁹ The Hearing Panel also finds that DLA failed to supervise its CMO pricing and establish reasonable procedures to monitor the fairness of the CMO pricing, in violation of NASD Conduct Rules 3010(a) and 2110, as described in the Sixth Cause of Action.

The Fourth and Sixth Causes of Action allege that Mason failed to reasonably supervise the municipal bond and CMO pricing. However, because Mason is “substantively responsible” for the misconduct alleged in First and Fifth Causes of Action of the Complaint, he cannot also be responsible “for inadequate supervision with respect to those violations.”³¹⁰ Accordingly, the Fourth Cause of Action is dismissed, and the Sixth Cause of Action is dismissed solely as it relates to Mason.³¹¹

3. Municipal Bond Order Tickets

DLA also failed to implement procedures reasonably designed to ensure it complied with the MSRB Rule G-8(a)(vii) requirement that it record the time of the customer purchase of municipal bonds. DLA’s failure to address this requirement in its WSPs is consistent with DLA’s complete failure to comply with the MSRB’s mandate that it record the time of the customer order. DLA’s employees, including Akerman, DLA’s then-Director of Compliance (and later CCO), testified that DLA simply did not

³⁰⁹ See *supra* footnotes 251 and 252 and accompanying text (discussing standard for finding of willfulness).

³¹⁰ See *Dep’t of Enforcement v. Block*, No. C05990026, 2000 NASD Discip. LEXIS 33, at *26-27 (O.H.O. Sept. 5, 2000) (quoting *Market Surveillance Comm. v. Markowski*, No. CMS920091, 1998 NASD Discip. LEXIS 35, at *52-53 (N.A.C. July 13, 1998)); *Anthony J. Amato*, 45 S.E.C. 282, 286-87 (1973) (setting aside NASD’s finding that respondent failed to supervise in light of respondent’s active role in primary violation).

³¹¹ If Mason had not been charged as a primary violator under the First and Fifth Causes of Action, the Hearing Panel would conclude that Mason committed the supervisory violations.

record that information. The Hearing Panel finds that DLA willfully failed to implement a reasonable supervisory system and procedures to ensure compliance with MSRB Rule G-8(a)(vii), in violation of MSRB Rule G-27.³¹²

V. SANCTIONS

A. Municipal Bond and CMO Markups

1. Sanction Guidelines

The FINRA Sanction Guidelines (“Guidelines”) recommend a fine of \$5,000 to \$100,000 for matters involving excess markups in violation of NASD Conduct Rule 2440, IM-2440, and MSRB Rule G-30.³¹³ For individual respondents, the Guidelines for excessive markups suggest a suspension in any or all capacities for up to 30 business days, but recommend consideration of a longer suspension (up to two years or a bar) in egregious cases.³¹⁴

2. Principal Considerations

The Hearing Panel applied the Principal Considerations in Determining Sanctions and found several aggravating factors relevant to this proceeding.³¹⁵ The Hearing Panel reviewed DLA’s disciplinary history and found that it had engaged in past misconduct that “evidences disregard for regulatory requirements.”³¹⁶ DLA’s relevant disciplinary history consists of the following: In February 2006, DLA entered into an Acceptance Waiver and Consent (“AWC”) with FINRA containing findings that DLA violated Section 17(a) of the Exchange Act, Rules 17a-3 and 17a-4 promulgated thereunder, and

³¹² See *supra* footnotes 251 and 252 and accompanying text (discussing standard for finding of willfulness).

³¹³ *FINRA Sanction Guidelines* 90 (2011), www.finra.org/sanctionguidelines.

³¹⁴ *Id.*

³¹⁵ *Id.* at 6-7.

³¹⁶ *Id.* at 6 (Principal Consideration No. 1).

NASD Rules 1021, 2110, 3010, and 3110, by effecting variable life insurance and variable annuity replacement sales to public customers in contravention of New York State Insurance Department Regulation 60 (“Regulation 60”). In addition, DLA failed to observe high standards of commercial honor and just and equitable principles of trade and failed to prepare and maintain accurate books and records of variable life insurance and variable annuity replacement sales subject to Regulation 60. The AWC also stated that DLA, acting through an individual, permitted a registered representative to function as a principal without being properly registered in a principal capacity. FINRA also found that DLA, acting through representatives, failed to reasonably supervise the activities of its associated persons and registered representatives related to variable life insurance and variable annuity replacement sales subject to Regulation 60. Pursuant to the AWC, DLA accepted a censure, a \$400,000 fine, and a suspension from engaging in any variable life insurance or variable annuity business for 30 days for new customers.³¹⁷

In April 2004, DLA entered into an AWC with FINRA containing findings that it conducted sales contests in which DLA favored certain proprietary mutual funds or variable annuity contracts distributed or offered by DLA, in violation of NASD’s mutual fund and variable contract non-cash compensation provisions of NASD Conduct Rules 2830 and 2820, as well as NASD Conduct Rule 2110. Additionally, the AWC contained findings that DLA failed to establish and maintain a supervisory and compliance system or procedures governing the non-cash compensation provisions, in violation of NASD

³¹⁷ See CX-9, at 53-54.

Conduct Rules 3010 and 2110. Pursuant to the AWC, DLA accepted a censure and a \$100,000 fine.³¹⁸

In determining sanctions, the Hearing Panel considered DLA's prior warnings from FINRA. The MSRB Rule G-30 violation relating to municipal bond markups is a repeat violation from a 2004 routine examination in which DLA received a Letter of Caution.³¹⁹ Specifically, FINRA found that DLA charged excessive markups of more than 3.75% on 17 municipal securities transactions.³²⁰ The markups at issue ranged from 3.86% to 4.94%³²¹ The Letter of Caution advised the firm that "repeat violations will be taken into consideration in determining any future matter."³²² Notwithstanding this warning, Respondents charged DLA customers excessive markups on municipal bonds and CMOs throughout the respective relevant periods and beyond.³²³

The Hearing Panel finds that Respondents have neither acknowledged nor accepted responsibility for the misconduct at issue in this matter.³²⁴ Instead, despite Respondents' awareness of FINRA's concerns about their markups practices, they continued to charge excessive markups. Specifically, Respondents' misconduct continued after FINRA provided the Wells notices to them in July 2009, which stated that Enforcement had preliminarily determined to pursue the charges in this case. For example, on January 29, 2010, in a separate investigation, FINRA informed DLA that it made preliminary determinations to recommend that disciplinary actions be brought

³¹⁸ *See id.* at 38-39.

³¹⁹ CX-46; *see* CX-44 and CX-45.

³²⁰ CX-46, at 5.

³²¹ CX-44, at 2-3.

³²² CX-46, at 5.

³²³ *Guidelines*, at 7 (Principal Consideration No. 15).

³²⁴ *Id.* at 6 (Principal Consideration No. 2).

against it for unfair and unreasonable municipal bond pricing with respect to nine transactions, in violation of MSRB Rules G-17 and G-30.³²⁵ In fact, even after Enforcement filed the Complaint in this proceeding in May 2010, FINRA's Department of Market Regulation detected DLA transactions with markups exceeding 3% in which the firm bought and sold the municipal bond on the same day.³²⁶ Respondents' disregard for the security industry's regulatory requirements is evident through Respondents' refusal to take responsibility for their misconduct and their continued unfair pricing practice.

In keeping with their unwillingness to accept responsibility, Respondents have not taken any corrective measures to improve their fixed income markups policies and practices. The evidence indicates that DLA continues to charge their customers excessive markups on fixed income products.³²⁷ There is no evidence that Respondents have made any attempt to pay restitution to the affected customers or otherwise remedy their misconduct.³²⁸

The Hearing Panel observed that this case involves "numerous acts" that form a "pattern of misconduct" involving excessive markups on the Identified Municipal Bonds and CMOs over an "extended period of time."³²⁹ During the 25-month Municipal Bond Period, Respondents charged unfair and unreasonable prices with respect to 1,522

³²⁵ CX-52.

³²⁶ CX-54; *see also* CX-52 and CX-53 (Wells notice and response regarding recent municipal bond trades).

³²⁷ *Guidelines*, at 6 (Principal Consideration No. 3).

³²⁸ *Id.* (Principal Consideration No. 4).

³²⁹ *Id.* (Principal Consideration Nos. 8 and 9); *see id.* at 7 (Principal Consideration No. 18: "The number, size and character of the transactions at issue").

municipal bond transactions,³³⁰ with markups ranging from 3.01% to 5.78%. During the 32-month CMO Period, Respondents charged unfair and unreasonable prices with respect to 1,746 CMO transactions, with markups ranging from 4.02% to 12.39%.

Respondents' pattern of excessive markups was intentional or, at a minimum, extremely reckless.³³¹ In particular, during the Municipal Bond Period the municipal bond market was entirely transparent. Respondents admitted to closely monitoring trade activity, and thus were very aware of current market prices. Notwithstanding this knowledge, when setting retail prices, Respondents consistently and significantly imposed excessive, undisclosed markups on their customers. In addition, Respondents had sufficient information regarding the CMO market to have been aware that they were significantly overcharging their customers for CMOs. Instead, they engaged in a consistent pattern of markups, the majority of which hovered around 5%.

Respondents' excessive municipal bond and CMO markups caused customer harm in the form of overcharges, from which Respondents financially benefitted.³³² Indeed, the significant quantifiable customer losses totaled \$765,345.28 on municipal bond transactions³³³ and \$692,731.24 on CMO transactions,³³⁴ exclusive of pre-judgment interest.³³⁵

³³⁰ This number excludes the 16 transactions that the Hearing Panel disregarded. *See supra* footnote 8.

³³¹ *Guidelines*, at 7 (Principal Consideration No. 13).

³³² *Id.* at 7 (Principal Consideration No. 17).

³³³ *See* CX-5. The Hearing Panel reduced the total restitution amount to reflect the removal of the 16 transactions referenced in footnote 8.

³³⁴ CX-6.

³³⁵ *Guidelines*, at 11 (Restitution – Payment of Interest).

3. Conclusion

After careful consideration, the Hearing Panel finds that Respondents' markup violations are egregious due to the amount of customer harm, the number of transactions at issue, the extended time period of the violative trades, and the intentional, or at least reckless, nature of the misconduct. In light of the scope and severity of the misconduct, a substantial fine is appropriate. For Respondents' municipal bond and CMO markup violations, the Hearing Panel fines DLA a total of \$2 million and Mason a total of \$200,000.

Regarding the municipal bond markups, in violation of MSRB Rules G-30 and G-17, DLA is fined \$1 million. DLA is also required to pay restitution to the customers associated with the Identified Municipal Bond trades specified in Schedule A to this decision, in the total amount of \$765,345.28,³³⁶ plus interest thereon at the rate set forth in Section 6621(a) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2), from the date of the municipal bond customer sale until the date that restitution is paid.³³⁷ Each customer shall be repaid the amount shown in the column labeled "Excess Markup" on Schedule A to this decision, plus interest.³³⁸ DLA is ordered to pay the restitution within 60 days of the effective date of this Decision. DLA is required to provide to Enforcement proof of payment for each Identified Municipal Bond trade; if DLA cannot locate a customer, DLA must provide proof that it has made a bona fide attempt to locate the customer. Any amount of restitution not paid to customers shall be paid to FINRA in the form of a fine. The Hearing Panel eliminates the interest requirement on any sums paid to FINRA as a

³³⁶ CX-5. This restitution amount is reduced to reflect the removal of the trades identified in footnote 8.

³³⁷ *Guidelines*, at 4 (General Principles Applicable to All Sanction Determinations).

³³⁸ *Cf. Dist. Bus. Conduct Comm. v. Reed*, No. C06910024, 1995 NASD Discip. LEXIS 240, at *14, *19 (Jan. 11, 1995) (awarding restitution to customers involved in transactions in attached markup schedule).

fine.³³⁹ For the municipal bond markups, Mason is fined \$100,000 and suspended from associating with any member firm in any capacity. The majority determined that a 6-month suspension was the appropriate remedial sanction for Mason. The Hearing Officer dissents as to the length of Mason's suspension and would suspend Mason for 18 months.

Regarding the CMO markups, in violation of NASD Conduct Rule 2440 and IM-2440-1, and NASD Conduct Rule 2110, DLA is fined \$1 million. DLA is also required to pay restitution to the customers associated with the Identified CMO trades specified in Schedule B to this decision, in the total amount of \$692,731.24, plus interest thereon at the rate set forth in Section 6621(a) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2), from the date of the CMO customer sale until the date that restitution is paid. Each customer shall be repaid the amount shown in the column labeled "Excess Markup" on Schedule B to this decision, plus interest. DLA is ordered to pay the restitution within 60 days of the effective date of this Decision. DLA is required to provide to Enforcement proof of payment for each Identified CMO trade; if DLA cannot locate a customer, DLA must provide proof that it has made a bona fide attempt to locate the customer. Any amount of restitution not paid to customers shall be paid to FINRA in the form of a fine. The Hearing Panel eliminates the interest requirement on any sums paid to FINRA as a fine. For the CMO markups, Mason is fined \$100,000 and suspended for 6 months from associating with any member firm in any capacity, which will run concurrently with Mason's suspension associated with the municipal bond markups violation. As noted above, the Hearing Officer dissents with regard to Mason's suspension.

³³⁹ Cf. *Dist. Bus. Conduct Comm. v. Escalator Sec., Inc.*, No. C07930034, 1998 NASD Discip. LEXIS 21, at *1 (Feb. 19, 1998) (requiring restitution not paid to customers to be paid to FINRA as a fine).

B. Recordation of Time on Customer Orders

For recordkeeping violations, including violations of MSRB Rule G-8, the Guidelines recommend a fine of \$1,000 to \$10,000, increased to \$10,000 to \$100,000 in egregious cases. DLA's misconduct in this matter was egregious; it failed to record the time at which it received customer municipal bond orders in approximately 2,307 instances from April to June 2005. This misconduct occurred *after* a FINRA warning. Specifically, following a 2004 routine examination, DLA received a Letter of Caution from FINRA for its failure to comply with MSRB Rule G-8.³⁴⁰ The firm's WSPs in effect at the time had no provision addressing this recording requirement.³⁴¹ Moreover, DLA has not acknowledged this violation. The Hearing Panel determined that the appropriate remedial sanction for this violation is a \$25,000 fine.

C. Supervision and Written Supervisory Procedures

For the separate failures to supervise, in violation of MSRB Rule G-27 and NASD Conduct Rule 3010(a), the Guidelines recommend a fine of \$5,000 to \$50,000.³⁴² The Guidelines set forth the following considerations when determining the appropriate sanction for a failure to supervise: (1) the quality and degree of the supervisor's implementation of the firm's supervisory procedures and controls, (2) whether respondent ignored "red flag" warnings that should have resulted in additional supervisory scrutiny; and (3) the nature, extent, size and character of the underlying misconduct.³⁴³

³⁴⁰ CX-46, at 5.

³⁴¹ CX-7.

³⁴² *Guidelines*, at 103.

³⁴³ *Id.*

The Hearing Panel found no evidence of any effective supervisory controls for DLA's municipal bond and CMO pricing. At the outset, DLA's supervisory structure was deficient in that it designated Mason as the supervisor for the Trading Department. Because Mason was also responsible for setting and reviewing the municipal bond and CMO prices, the supervisory structure amounted to self-supervision for Mason and the Trading Department. Additionally, Mason was compensated based on the trading profit of the Trading Department.³⁴⁴

Furthermore, even utilizing its ineffective system, DLA did virtually nothing to oversee Mason's supervision of municipal bond and CMO pricing. As noted above, Akerman, DLA's Director of Compliance and CCO, did not ever recall advising Mason that a price he set was too high.³⁴⁵ In fact, Mason testified that no one at DLA ever told him that he was pricing municipal bonds and CMOs unfairly or improperly.³⁴⁶

While DLA's Compliance Department had a supervisory role with respect to the municipal bond and CMO transactions, it did not review *any* transactions in which the markups were less than 5% above the market price, which constituted many of violative trades in this matter. And, its review of transactions with markups greater than 5% consisted of ineffective spot-checks. DLA's failure to review any municipal bond and CMO pricing with markup below 5% was appalling, especially in light of the well-established guidance from regulators as well as case law that clearly stated that markups below 5% may be unfair and unreasonable. Further, by failing to focus on any markups below 5%, it tacitly endorsed Mason's pricing practices.

³⁴⁴ Tr. 627-28.

³⁴⁵ Tr. 550-51, 566-67.

³⁴⁶ Tr. 2923-24.

DLA ignored “red flag” warnings that should have resulted in additional supervisory scrutiny. The most blatant red flag was the publically-available MSRB data that demonstrated Respondents’ excessive markups. On a daily basis, DLA, through Mason, ignored the prices at which other customers purchased the exact same municipal bond. DLA also ignored the warning from FINRA. As discussed above, after DLA’s 2004 routine exam, it received a letter of caution regarding its excessive markups. Despite the warning, DLA did not alter its supervisory practices.

Lastly, the underlying misconduct facilitated by the DLA’s lack of supervision was egregious and pervasive, resulting in a pattern of unfair pricing in both municipal bond and CMO transactions that caused harm to retail customers in connection with the approximately 3,268 transactions at issue.

The evidence supports a fine for DLA exceeding the maximum called for under the Guidelines. The Hearing Panel determined that the appropriate remedial sanction for DLA is a total fine of \$300,000 for its supervisory violations. For DLA’s violation of MSRB Rule G-27, DLA is (1) fined \$150,000, (2) required to revise its procedures to ensure that they are reasonably designed to comply with the requirements of MSRB Rule G-30, including but not limited to the deficiencies found in this proceeding in connection with the excessive municipal bond markups, and (3) required to retain an independent consultant with experience in designing and evaluating broker-dealer procedures, who shall be not unacceptable to Enforcement, to review and approve DLA’s revised procedures as being reasonably designed to achieve compliance with the requirements of MSRB Rules G-30 and G-8. For DLA’s violation of NASD Conduct Rules 3010(a) and 2110, DLA is also (1) fined \$150,000, (2) required to revise its procedures to ensure that

they are reasonably designed to comply with the requirements of NASD Conduct Rule 2440 and IM-2440-1, including but not limited to the deficiencies found in this proceeding in connection with the excessive CMO markups, and (3) required to retain an independent consultant with experience in designing and evaluating broker-dealer procedures, who shall be not unacceptable to Enforcement, to review and approve DLA's revised procedures as being reasonably designed to achieve compliance with the requirements of NASD Conduct Rule 2440 and IM-2440-1.³⁴⁷

VI. ORDER

Based on careful consideration of all the evidence, the Hearing Panel imposes the following sanctions:³⁴⁸

A. First Cause of Action: DLA's and Mason's Unfair Municipal Bond Markups

1. For willfully charging excessive municipal bond markups in violation of MSRB Rules G-30 and G-17, DLA is fined \$1 million. DLA is also ordered to pay restitution to the customers associated with the Identified Municipal Bond Trades specified in Schedule A to this decision, in the total amount of \$765,345.28,³⁴⁹ plus interest thereon at the rate set forth in Section 6621(a) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2), from the date of the municipal bond customer sale until the date that restitution is paid. Each customer shall be repaid the amount shown in the column labeled "Excess Markup" on Schedule A, plus interest. DLA is ordered to pay the restitution within 60 days of the effective date of this Decision. DLA is required to provide to

³⁴⁷ Respondents may use the same consultant that they engage for the review of the municipal bond procedures provided the consultant has the necessary expertise in CMOs.

³⁴⁸ The Hearing Panel considered all of the parties' arguments. They are rejected or sustained to the extent that they are inconsistent with the views expressed herein.

³⁴⁹ CX-5. This restitution amount reflects the removal of the trades identified in footnote 8.

Enforcement proof of payment for each Identified Municipal Bond trade; if DLA cannot locate a customer, DLA must provide proof that it has made a bona fide attempt to locate the customer. Any amount of restitution not paid to customers shall be paid to FINRA in the form of a fine. The Hearing Panel eliminates the interest requirement on any sums paid to FINRA as a fine.

2. For willfully charging excessive municipal bond markups in violation of MSRB Rules G-30 and G-17, Mason is fined \$100,000 and suspended for 6 months from associating with any member firm in any capacity.

B. Second Cause of Action: DLA's Failure to Record Time on Municipal Bond Order Tickets

For willfully failing to record the time of receipt on municipal bond customer order tickets, in violation of MSRB Rule G-8, DLA is fined \$25,000.

C. Third Cause of Action: DLA's Inadequate Supervisory Systems and Procedures for Municipal Bonds

For willfully failing to supervise municipal bond pricing and establish and maintain adequate procedures to (1) monitor the fairness of pricing for municipal bonds, and (2) ensure that it recorded the time at which its customers placed municipal bond orders, in violation of MSRB Rule G-27, DLA is (1) fined \$150,000, (2) required to revise its procedures to ensure that they are reasonably designed to comply with the requirements of MSRB Rules G-30 and G-8, including but not limited to the deficiencies found in this proceeding in connection with the excessive municipal bond markups, and (3) required to retain an independent consultant with experience in designing and evaluating broker-dealer procedures, who shall be not unacceptable to Enforcement, to review and approve DLA's revised procedures as being reasonably designed to achieve compliance with the requirements of MSRB Rules G-30 and G-8.

D. Fourth Cause of Action: Mason's Inadequate Supervisory Systems and Procedures for Municipal Bonds

The Fourth Cause of Action is dismissed.

E. Fifth Cause of Action: DLA's and Mason's Unfair CMO Markups

1. For charging excessive CMO markups in violation of NASD Conduct Rule 2440 and IM-2440-1, and NASD Conduct Rule 2110, DLA is fined \$1 million. DLA is also ordered to pay restitution to the customers associated with the Identified CMO Trades specified in Schedule B to this decision, in the total amount of \$692,731.24, plus interest thereon at the rate set forth in Section 6621(a) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2), from the date of CMO customer sale until the date that restitution is paid. Each customer shall be repaid the amount shown in the column labeled "Excess Markup" on Schedule B, plus interest. DLA is ordered to pay the restitution within 60 days of the effective date of this Decision. DLA is required to provide to Enforcement proof of payment for each Identified CMO trade; if DLA cannot locate a customer, DLA must provide proof that it has made a bona fide attempt to locate the customer. Any amount of restitution not paid to customers shall be paid to FINRA in the form of a fine. The Hearing Panel eliminates the interest requirement on any sums paid to FINRA as a fine.

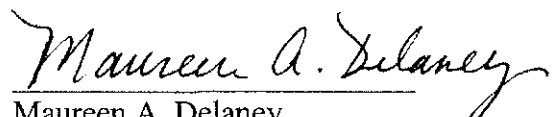
2. For charging excessive CMO markups in violation of NASD Conduct Rule 2440 and IM-2440-1, and NASD Conduct Rule 2110, Mason is fined \$100,000 and suspended for 6 months from associating with any member firm in any capacity. This suspension shall run concurrently with Mason's suspension in the First Cause of Action.

F. Sixth Cause of Action: DLA's and Mason's Inadequate Supervisory Systems and Procedures for CMOs

For failing to supervise CMO pricing and establish adequate procedures to monitor the fairness of prices for CMOs, in violation of NASD Conduct Rules 3010(a) and 2110, DLA is (1) fined \$150,000, (2) required to revise its procedures to ensure that they are reasonably designed to comply with the requirements of NASD Conduct Rule 2440 and IM-2440-1, including but not limited to the deficiencies found in this proceeding in connection with the excessive CMO markups, and (3) required to retain an independent consultant with experience in designing and evaluating broker-dealer procedures, who shall be not unacceptable to Enforcement, to review and approve DLA's revised procedures as being reasonably designed to achieve compliance with the requirements of NASD Conduct Rule 2440 and IM-2440-1. The Sixth Cause of Action is dismissed with respect to Respondent Mason.

In addition, the Respondents, jointly and severally, are ordered to pay the costs of this proceeding in the total amount of \$23,232.80, which include an administrative fee of \$750 and hearing transcript costs of \$22,482.80.

These sanctions shall become effective on a date set by FINRA, but not earlier than 30 days after this Decision becomes the final disciplinary action of FINRA; except, if this Decision becomes the final disciplinary action of FINRA, the suspension of Mason shall commence with the opening of business on June 4, 2012, and end at the close of business on December 3, 2012.


Maureen A. Delaney
Hearing Officer
For the Extended Hearing Panel

DISSENT

Hearing Officer Delancy, dissenting, in part:

I respectfully dissent from the sanction imposed on Respondent Mason as I would impose a lengthier suspension for his markup violations. I join in the remainder of the decision.

Here, the evidence supports a sanction for Mason at the higher end of the Guidelines. DLA is a large firm, employing approximately 350 registered representatives. Mason played an important role at DLA. He was (and still is) an Executive Vice-President and Head Trader, who reported directly to David Lerner.³⁵⁰ As the Head Trader, Mason determined which municipal bonds and CMOs to purchase.³⁵¹ He then set the prices, or was involved in setting the prices, that customers would pay to purchase those municipal bonds and CMOs.³⁵² Mason was responsible for everything in the Trading Department, including its profit and loss.³⁵³ DLA compensated Mason based on the trading profit of the Trading Department.³⁵⁴

Mason has held the Head Trader position since 1993.³⁵⁵ Mason testified that he knew the MSRB Rule G-30 and NASD Rule 2440 factors applied to the retail pricing, and it was his responsibility to comply with them.³⁵⁶ That said, he could not explain how much weight he gave to any particular factor when pricing the municipal bonds and

³⁵⁰ Tr. 793; CX-7, at 20; RX-47, at 12; CX-8, at 11.

³⁵¹ Tr. 606.

³⁵² Tr. 604-06, 609-10.

³⁵³ Tr. 604-05.

³⁵⁴ Tr. 627-28.

³⁵⁵ Tr. 604.

³⁵⁶ Tr. 641-42.

CMOs.³⁵⁷ Mason also refused to acknowledge that the DLA's WSPs contained the incorrect factors for pricing CMOs.³⁵⁸

Regarding municipal bond pricing, Mason testified that yield to the customer was the most important factor in determining municipal bond prices.³⁵⁹ Yet, DLA's customers received consistently below market yields. Mason used MSRB data to make sure he purchased municipal bonds at a good price.³⁶⁰ Conversely, in pricing municipal bonds for DLA's customers, Mason did not consider the prices other dealers charged customers for the same bonds at the same time, or the yields received by such customers, as reported to the MSRB and made publicly available.³⁶¹ He ignored this information even though it was on the same screen and intermingled with the interdealer prices.³⁶² He also failed to make any attempt to determine the markups charged by other firms, either through discussions with other dealers or through review of MSRB data.³⁶³

Regarding CMOs, Mason acknowledged that average life was an important factor,³⁶⁴ but his markups did not demonstrate a variation based on average life. While he wanted to pay the lowest possible price for the CMOs he purchased, which he accomplished by checking prices offered from other dealers,³⁶⁵ Mason failed to ensure that DLA's customers received a fair price.

³⁵⁷ Tr. 651, 704, 750, 765.

³⁵⁸ Tr. 644-45.

³⁵⁹ Tr. 661, 2413-14.

³⁶⁰ Tr. 669, 686, 696.

³⁶¹ Tr. 671, 676-77, 686-87, 696.

³⁶² Tr. 686-87.

³⁶³ Tr. 2853-59.

³⁶⁴ Tr. 738.

³⁶⁵ Tr. 615.

Mason's municipal bond and CMO pricing did not vary depending on the particular characteristics of the transactions such as size and amount. Instead, his markups reflected a pattern – generally a 4% or greater markup.

Mason lacked credibility. He testified that he factored in DLA's services when pricing the municipal bonds and CMOs;³⁶⁶ however, he had no recollection of mentioning this factor during his investigative testimony.³⁶⁷ Further, at the hearing, Mason admitted that he only knew of *some* of DLA's services.³⁶⁸ He also had no basis for comparing DLA's services to other brokers because he was unaware of the services they provided.³⁶⁹ Mason testified that he factored in DLA's expenses when pricing the municipal bonds and CMOs, but he failed to identify expenses as a factor in his Wells response.³⁷⁰ Mason also testified that he considered mutual fund loads as a factor when pricing his municipal bonds and CMOs; however, he never identified mutual fund loads as a factor in his Wells response and had no recollection this factor in his investigative testimony.³⁷¹

With regard to municipal bond pricing, Mason testified at the hearing that he relied on the 1981 case as a factor; however, he neglected to mention this in his prior investigative testimony and his Wells response.³⁷² Interestingly, while Mason claimed to have relied on this case, he admitted that he never read it or reviewed the markup schedule attached to the case.³⁷³ Mason argued that the 1981 case set a standard,

³⁶⁶ Tr. 694, 745.

³⁶⁷ Tr. 694-95, 731-32.

³⁶⁸ Tr. 698-99.

³⁶⁹ Tr. 698, 702-03.

³⁷⁰ Compare Tr. 697, 703, 717, 745 with CX-18.

³⁷¹ Compare Tr. 715-16, 750-52 with CX-18 and Tr. 733.

³⁷² Compare Tr. 650-53 with CX-18 and Tr. 667.

³⁷³ Tr. 648, 665-66.

permitting him to markup his bonds by 40 basis points.³⁷⁴ Yet, at the hearing, he refused to agree that a loss of 40 basis points on a bond that is yielding 8-9% is very different than a loss of 40 basis points on a bond that is yielding 4-5%.³⁷⁵ Mason also testified that when pricing municipal bonds he would look at the price at which *similar* bonds traded; however, he would not look at what customers paid for the exact same bond (i.e., the MSRB data).³⁷⁶

For his CMO pricing, at the hearing, Mason claimed that DLA was a market maker and that he considered DLA's market maker status when pricing the CMOs.³⁷⁷ However, he never mentioned DLA's market maker status in his Wells response.³⁷⁸

As the Head Trader, Mason was required to ensure that these markup violations did not occur. While Mason stated in his Answer that he attended numerous continuing education programs, conferences, and panels organized by FINRA on the subject of fair pricing and markups in the fixed income sphere, he ignored the regulatory requirements for fair pricing. The Hearing Officer finds that given (1) the manner in which Mason priced the municipal bonds and CMOs, (2) the pattern exhibited, (3) the amount of the markups and resulting customer harm, (4) the duration of the misconduct, and (5) Mason's lack of credibility, Mason's misconduct was intentional, or at a minimum extremely reckless.

While the Hearing Panel did not find Mason liable for the supervisory violations because he is liable as a primary violator, Mason had extensive supervisory

³⁷⁴ Tr. 655-56.

³⁷⁵ Tr. 656, 663-65.

³⁷⁶ Tr. 671, 677, 687, 696.

³⁷⁷ Tr. 761-65.

³⁷⁸ CX-18.

responsibilities at DLA. The SEC recently emphasized that “[p]roper supervision is the touchstone to ensuring that broker-dealer operations comply with the securities laws and NASD rules” and “is a critical component to ensuring investor protection.”³⁷⁹ Mason has been the “designated supervisor” for the Trading Desk since November 1992.³⁸⁰ He was responsible for supervising and training the traders.³⁸¹ David Lerner, the president of DLA, also relied on Mason to work with its investment counselors; Mason would regularly address them at their weekly meetings.³⁸²

He has been registered with FINRA as a Municipal Securities Principal since 1990, and a General Securities Principal since 1993.³⁸³ “[T]he registration requirements are intended to ensure that principals ‘maintain the requisite levels of knowledge and competence.’”³⁸⁴ As a registered principal and the designated principal for the Trading Department in charge of teaching other traders on the proper pricing methods, Mason had an obligation to know the requirements and ensure that he was properly pricing the municipal bonds and CMOs. The SEC has stressed that a Series 24 principal registration comes with certain important responsibilities.

NASD’s registration requirement “provides an important safeguard in protecting public investors,” and “strict adherence” to that requirement is “essential” because it “serves a significant purpose in the policing of the securities markets” and in the protection of the public interest....” As we also have observed, the “registered principal is the person at the broker-

³⁷⁹ *Dennis S. Kaminski*, Exchange Act Rel. No. 65347, 2011 SEC LEXIS 3225, at *35 (Sept. 16, 2011) (citations omitted).

³⁸⁰ CX-7, CX-8.

³⁸¹ CX-7; Tr. 604, 610.

³⁸² Tr. 2950.

³⁸³ Compl. ¶ 3; Answer at 8, ¶ 3; CX-10.

³⁸⁴ *Hans N. Beerbaum*, Exchange Act Rel. No. 55731, 2007 SEC LEXIS 971, at *14 n.17 (May 9, 2007).

dealer to whom the NASD looks to ensure compliance with regulatory requirements.”³⁸⁵

Given Mason’s principal registration and his supervisory role at DLA, he cannot credibly claim that his pricing complied with FINRA’s and MSRB’s regulatory requirements.

“It is especially imperative that those in authority exercise particular vigilance when indications of irregularity reach their attention.”³⁸⁶ As Head Trader and an Executive Vice-President at DLA, Mason was in a position of authority. The customer prices on the publically available MSRB data should have been a “red flag” for Mason, signaling that he was not charging a fair price to DLA’s customers. “The duty of supervision includes the responsibility to *investigate ‘red flags’* that suggest that misconduct may be occurring and to *act* upon the results of such investigation.”³⁸⁷ He ignored the red flags for 2 ½ years and refused to alter his unfair pricing.

All of the aggravating factors discussed in the Sanctions section are equally applicable to Mason. Accordingly, I conclude that Mason was, at a minimum, extremely reckless in pricing the municipal bonds and CMOs. He ignored market data that clearly demonstrated the extensive disparity between DLA’s pricing and that of other firms. No excuse can justify this conduct. Unlike the majority, I cannot agree that Mason’s misconduct warrants such a minor suspension. Mason is an experienced securities professional. Plus, as a registered general securities principal and municipal principal, he should have been a watchdog for potential securities violations in the Trading Department. Instead, Mason charged unfair prices on thousands of municipal bonds and

³⁸⁵ *Id.* at *14.

³⁸⁶ *Kaminski*, 2011 SEC LEXIS 3225, at *25-26.

³⁸⁷ *Id.* at *25 (quoting *Michael T. Studer*, 57 S.E.C. 1011, 1023-24 (2004)) (emphasis added).

CMOs, resulting in nearly \$1.5 million in customer harm. Thus, I would suspend Mason from associating with any member firm in any capacity for 18 months.

Copies to: David Lerner Associates, Inc. (*by overnight courier and first-class mail*)
William Mason (*by overnight courier and first-class mail*)
Paul J. Bazil, Esq. (*via electronic and first-class mail*)
Anthony W. Djinis, Esq. (*via electronic and first-class mail*)
Michael G. Shannon, Esq. (*via electronic and first-class mail*)
Jeffrey Pariser, Esq. (*via electronic and first-class mail*)
Matthew D. Meisner, Esq. (*via electronic mail*)
David R. Sonnenberg, Esq. (*via electronic mail*)

Department of Enforcement
V.
David Lerner Associates, Inc.
and William Mason

Disciplinary Proceeding No. 20050007427

Schedule A to Extended Hearing Panel Decision
Muni Customer Restitution Calculation

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
1	108151G96	DLA Buy	04/24/06	99.755	104.000	150	4.26%	424.50	2.50%	-	-
2	108151G96	Customer Buy	04/25/06		104.000	10	4.26%	424.50	2.50%	249.39	175.11
3	108151G96	Customer Buy	04/25/06		104.000	15	4.26%	636.75	2.50%	374.08	262.67
4	108151G96	Customer Buy	04/25/06		104.000	10	4.26%	424.50	2.50%	249.39	175.11
5	139522BN5	DLA Buy	11/28/05	99.375	103.625	185	4.28%	637.50	2.50%	-	-
6	139522BN5	Customer Buy	11/29/05		103.625	15	4.28%	1,275.00	2.50%	372.66	264.84
7	139522BN5	Customer Buy	11/29/05		103.000	15	3.65%	543.75	2.50%	372.66	529.69
8	139522BN5	Customer Buy	11/29/05		103.625	30	4.28%	1,275.00	2.50%	745.31	171.09
9	139522BN5	Customer Buy	11/29/05		103.625	20	4.28%	850.00	2.50%	466.88	529.69
10	162276ED7	DLA Buy	07/25/05	99.250	103.375	355	4.16%	4,125.00	2.50%	-	-
11	162276ED7	Customer Buy	07/26/05		103.375	100	4.16%	825.00	2.50%	2,481.25	1,643.75
12	162276ED7	Customer Buy	07/26/05		103.375	25	4.16%	1,031.25	2.50%	466.25	328.75
13	162276ED7	Customer Buy	07/26/05		103.375	65	4.16%	2,681.25	2.50%	620.31	410.94
14	162276EE5	DLA Buy	07/18/05	99.260	103.500	250	4.27%	424.00	2.50%	1,612.81	1,068.44
15	162276EE5	Customer Buy	07/19/05		103.000	10	4.27%	1,122.00	2.50%	248.15	175.85
16	162276EE5	Customer Buy	07/19/05		103.500	30	3.77%	1,272.00	2.50%	744.45	377.55
17	162276EE5	Customer Buy	07/19/05		103.500	50	4.27%	2,120.00	2.50%	744.45	527.55
18	165375ZC3	DLA Buy	01/31/05	98.774	102.750	100	4.03%	397.60	2.50%	1,240.75	879.25
19	165375ZC3	Customer Buy	02/01/05		102.750	10	4.03%	596.40	2.50%	246.94	150.67
20	165375ZC3	Customer Buy	02/01/05		102.750	15	4.03%	994.00	2.50%	370.40	226.00
					102.750	25	4.03%	994.00	2.50%	617.34	376.66

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
21	165375ZC3	Customer Buy	02/01/05		102.750	30	4.03%	1,192.80	2.50%	740.81	452.00
22	166042AY7	DLA Buy	02/28/05	99.625		150				-	-
	166042AY7	Customer Buy	03/01/05		102.750	20	3.14%	625.00	2.50%	498.13	126.88
	181576EG0	DLA Buy	07/25/05	98.500		200				-	-
	181576EG0	DLA Buy	07/25/05	98.500		255				-	-
	181576EG0	Customer Buy	07/26/05		102.625	20	4.19%	825.00	2.00%	394.00	431.00
23	181576EG0	Customer Buy	07/26/05		102.625	10	4.19%	412.50	2.00%	197.00	215.50
24	181576EG0	Customer Buy	07/26/05		102.625	15	4.19%	618.75	2.00%	295.50	323.25
25	181576EG0	Customer Buy	07/26/05		102.625	25	4.19%	1,031.25	2.00%	492.50	538.75
26	181576EG0	Customer Buy	07/26/05		102.625	60	4.19%	2,475.00	2.00%	1,182.00	1,293.00
27	181576EG0	Customer Buy	07/26/05		102.625	100	4.19%	4,125.00	2.00%	1,970.00	2,155.00
28	181576EG0	Customer Buy	07/26/05		102.625	15	4.19%	618.75	2.00%	295.50	323.25
29	181576EG0	Customer Buy	07/26/05		102.625	40	4.19%	1,650.00	2.00%	788.00	862.00
30	181576EG0	Customer Buy	07/26/05		102.625	25	4.19%	1,031.25	2.00%	492.50	538.75
31	181576EG0	Customer Buy	07/26/05		102.625	100	4.19%	4,125.00	2.00%	1,970.00	2,155.00
32	181576EL9	DLA Buy	07/11/05	98.750		250				-	-
33	181576EL9	Customer Buy	07/12/05		102.875	30	4.18%	1,237.50	2.50%	740.63	496.88
34	181576EL9	Customer Buy	07/12/05		102.875	20	4.18%	825.00	2.50%	493.75	331.25
35	181576EL9	Customer Buy	07/12/05		102.875	35	4.18%	1,443.75	2.50%	864.06	579.69
36	181576EL9	Customer Buy	07/12/05		102.875	10	4.18%	412.50	2.50%	246.88	165.63
37	181576EL9	Customer Buy	07/12/05		102.875	15	4.18%	618.75	2.50%	370.31	248.44
38	207743LY9	DLA Buy	03/07/05	98.275		150				-	-
	207743LY9	Customer Buy	03/08/05		102.375	10	4.17%	410.00	2.00%	196.55	213.45
	207743LY9	Customer Buy	03/08/05		102.375	50	4.17%	2,050.00	2.00%	982.75	1,067.25
40	20774L3V5	DLA Buy	06/15/05	94.785		30				-	-
	20774L3V5	DLA Buy	06/15/05	94.785		125				-	-
	20774L3V5	Customer Buy	06/15/05		98.500	10	3.92%	371.50	2.50%	236.96	134.54
	20774L3V5	Customer Buy	06/15/05		98.500	15	3.92%	557.25	2.50%	355.44	201.81
	20774L3V5	Customer Buy	06/15/05		98.500	30	3.92%	1,114.50	2.50%	710.89	403.61
42	20774L3V5	Customer Buy	06/15/05		98.750	20	4.18%	793.00	2.50%	473.93	319.08
43	20774L3V5	Customer Buy	06/15/05		98.750	20	4.18%	793.00	2.50%	473.93	319.08
44	20774L3V5	Customer Buy	06/15/05		98.750	25	4.18%	991.25	2.50%	592.41	398.84
45	20774L3V5	Customer Buy	06/16/05		98.750	15	4.18%	594.75	2.50%	355.44	239.31
46	20774LC78	DLA Buy	10/23/06	98.749		90				-	-
47	20774LC78	Customer Buy	10/24/06		102.875	25	4.18%	1,031.50	2.50%	617.18	414.32

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
48	20774LC78	Customer Buy	10/24/06		102.875	15	4.18%	618.90	2.50%	370.31	248.59
49	20774LC78	Customer Buy	10/24/06		102.875	25	4.18%	1,031.50	2.50%	617.18	414.32
50	20774LC78	Customer Buy	10/24/06		102.875	25	4.18%	1,031.50	2.50%	617.18	414.32
51	20774LN76	DLA Buy	04/26/05	103.642		100				-	-
	20774LN76	Customer Buy	04/27/05		107.875	15	4.08%	634.95	2.50%	388.66	246.29
52	20774UCF0	DLA Buy	05/04/06	93.280		300				-	-
	20774UCF0	Customer Buy	05/05/06		97.750	50	4.79%	2,235.00	2.50%	1,166.00	1,069.00
53	20774UCF0	Customer Buy	05/05/06		97.750	10	4.79%	447.00	2.50%	233.20	213.80
54	20774UCG8	DLA Buy	05/15/06	93.553		145				-	-
	20774UCG8	Customer Buy	05/16/06		97.875	10	4.62%	432.20	2.50%	233.88	198.32
55	20774UCG8	Customer Buy	05/16/06		97.875	20	4.62%	864.40	2.50%	467.77	396.64
56	20774UCH6	DLA Buy	03/20/06	99.125		100				-	-
	20774UCH6	Customer Buy	03/21/06		103.375	20	4.29%	850.00	2.50%	495.63	354.38
57	20774UCH6	DLA Buy	04/03/06	97.733		100				-	-
	20774UCH6	Customer Buy	04/04/06		102.000	10	4.37%	426.70	2.50%	244.33	182.37
58	20774UCH6	Customer Buy	04/04/06		101.000	20	3.34%	653.40	2.50%	488.67	164.73
59	20774UCH6	Customer Buy	04/04/06		102.000	15	4.37%	640.05	2.50%	366.50	273.55
60	20774UCH6	DLA Buy	04/10/06	97.438		100				-	-
	20774UCH6	Customer Buy	04/11/06		102.000	25	4.68%	1,140.50	2.50%	608.99	531.51
61	20774UCH6	Customer Buy	04/11/06		102.000	20	4.68%	912.40	2.50%	487.19	425.21
62	20774UCH6	Customer Buy	04/11/06		102.000	20	4.68%	912.40	2.50%	487.19	425.21
63	20774UCJ2	DLA Buy	04/17/06	96.198		150				-	-
	20774UCJ2	Customer Buy	04/18/06		100.375	10	4.34%	417.70	2.50%	240.50	177.21
64	20774UCJ2	Customer Buy	04/18/06		100.375	50	4.34%	2,088.50	2.50%	1,202.48	886.03
65	20774UCJ2	Customer Buy	04/18/06		100.375	15	4.34%	626.55	2.50%	360.74	265.81
66	20774UCJ2	Customer Buy	04/18/06		100.375	10	4.34%	417.70	2.50%	240.50	177.21
67	20774UCJ2	Customer Buy	04/18/06		100.375	15	4.34%	626.55	2.50%	360.74	265.81
68	20774UCJ2	Customer Buy	04/18/06		100.000	20	3.95%	760.40	2.50%	480.99	279.41
69	20774UCJ2	Customer Buy	04/18/06		100.000	10	3.95%	380.20	2.50%	240.50	139.71
70	20774UCK9	DLA Buy	05/30/06	100.250		250				-	-
	20774UCK9	Customer Buy	05/31/06		104.500	20	4.24%	850.00	2.50%	501.25	348.75
71	20774UCK9	Customer Buy	05/31/06		104.500	40	4.24%	1,700.00	2.50%	1,002.50	697.50

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
72	20774UGQ2	DLA Buy	11/27/06	98.125	101.375	425	3.31%	325.00	2.50%	245.31	-
73	20774UGQ2	Customer Buy	11/28/06		102.375	10	4.33%	1,062.50	2.50%	613.28	79.69
74	20774UGQ2	Customer Buy	11/28/06		102.375	25	4.33%	850.00	2.50%	490.63	449.22
75	20774UGQ2	Customer Buy	11/28/06		102.375	20	4.33%	425.00	2.50%	245.31	359.38
76	207758DF7	DLA Buy	02/13/06	100.738		10	4.33%	425.00	2.50%	245.31	179.69
77	207900BV2	DLA Buy	08/15/05	99.500		150	4.11%	620.55	2.50%	377.77	-
78	207900BV2	Customer Buy	02/14/06		104.875	15	4.11%	620.55	2.50%	377.77	242.78
79	207900BV2	Customer Buy	08/15/05		103.750	250	4.27%	2,125.00	2.50%	1,243.75	-
80	226003DJ7	DLA Buy	08/16/05		103.750	50	4.27%	4,250.00	2.50%	2,487.50	881.25
81	226003DJ7	Customer Buy	08/16/05		103.750	100	4.27%	2,125.00	2.50%	1,243.75	1,762.50
82	226003DJ7	Customer Buy	05/03/05		100.000	50	4.27%	2,125.00	2.50%	1,243.75	881.25
83	226003DJ7	Customer Buy	05/03/05		100.000	20	4.27%	678.80	2.50%	483.03	195.77
84	271299JD2	DLA Buy	05/02/05	96.606		100	3.51%	640.35	2.50%	362.27	-
85	271299JD2	Customer Buy	05/03/05		100.875	15	4.42%	640.35	2.50%	362.27	278.08
86	271299JD2	Customer Buy	05/03/05		100.875	15	4.42%	640.35	2.50%	362.27	278.08
87	271299JD2	Customer Buy	05/03/05		100.000	40	3.51%	1,357.60	2.50%	966.06	391.54
88	271299JD2	Customer Buy	05/03/05		100.000	20	3.51%	678.80	2.50%	483.03	195.77
89	276037DQ8	DLA Buy	03/09/05	98.500		150	4.19%	412.50	2.50%	246.25	-
90	276037DQ8	Customer Buy	03/09/05		102.625	10	4.19%	412.50	2.50%	246.25	166.25
91	276037DQ8	Customer Buy	03/09/05		102.625	40	4.19%	1,650.00	2.50%	985.00	665.00
92	276037DQ8	Customer Buy	03/09/05		102.625	10	4.19%	412.50	2.50%	246.25	166.25
93	276037DQ8	Customer Buy	03/10/05		102.625	30	4.19%	1,237.50	2.50%	738.75	498.75
94	277497HT3	DLA Buy	08/29/05	100.700		290	4.19%	412.50	2.50%	246.25	-
95	277497HT3	Customer Buy	08/30/05		105.000	10	4.27%	1,935.00	2.50%	1,132.88	802.12
96	277497HT3	Customer Buy	08/30/05		105.000	45	4.27%	1,935.00	2.50%	1,132.88	534.75
97	277497HT3	Customer Buy	11/21/05	98.219		205	4.23%	410.60	2.00%	196.44	-
98	277497HT3	Customer Buy	11/22/05		102.325	10	4.23%	2,078.00	2.00%	982.19	214.16
99	277497HT3	Customer Buy	11/22/05		102.375	50	4.23%	415.60	2.00%	196.44	1,095.81
100	277497HT3	Customer Buy	11/22/05		102.375	10	4.23%	415.60	2.00%	196.44	219.16
101	27779TBH0	DLA Buy	01/25/07	96.770		1000	4.19%	406.06	2.50%	242.04	-
102	27779TBH0	Customer Buy	01/26/07		100.875	10	4.19%	406.06	2.50%	242.04	164.03
103	27779TBH0	Customer Buy	01/26/07		100.875	250	4.19%	10,151.59	2.50%	6,050.90	4,100.69

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
96	295095BA0	DLA Buy	08/18/05	98.800	102.000	250	3.24%	640.00	3.00%	592.80	-
97	295095BA0	Customer Buy	08/18/05		103.000	25	4.25%	1,050.00	3.00%	741.00	47.20
98	295095BA0	Customer Buy	08/19/05		103.125	10	4.38%	432.50	3.00%	296.40	309.00
99	295095BA0	Customer Buy	08/19/05		103.125	10	4.38%	432.50	3.00%	296.40	136.10
100	295095BA0	Customer Buy	08/19/05		103.125	20	4.38%	865.00	3.00%	592.80	272.20
101	295095BB8	DLA Buy	01/04/06	93.649	98.000	500	4.65%	5,656.30	3.00%	3,652.31	-
102	295095BB8	Customer Buy	01/04/06		98.000	130	4.65%	2,175.50	3.00%	1,404.74	2,003.99
103	295095BB8	Customer Buy	01/04/06		98.000	50	4.65%	435.10	3.00%	280.95	770.77
104	295095BB8	Customer Buy	01/04/06		98.000	100	4.65%	4,351.00	3.00%	2,809.47	154.15
105	295095BB8	Customer Buy	01/04/06		98.000	35	4.65%	1,522.85	3.00%	983.31	1,541.53
106	295095BB8	Customer Buy	01/04/06		98.000	10	4.65%	435.10	3.00%	280.95	539.54
107	295095BB8	Customer Buy	01/04/06		98.000	30	4.65%	1,305.30	3.00%	842.84	154.15
108	295095BB8	Customer Buy	01/04/06		98.000	20	4.65%	870.20	3.00%	561.89	462.46
109	295095BB8	Customer Buy	01/04/06		98.000	10	4.65%	435.10	3.00%	280.95	308.31
110	295095BB8	Customer Buy	01/05/06		98.000	25	4.65%	1,087.75	3.00%	702.37	154.15
111	295095BB8	Customer Buy	01/05/06		98.000	25	4.65%	1,087.75	3.00%	702.37	385.38
112	295095BB8	DLA Buy	08/12/05	98.350	102.600	500	4.32%	850.00	3.00%	590.10	-
113	296804FL6	DLA Buy	05/24/05	99.625	103.750	250	4.14%	412.50	2.50%	249.06	163.44
114	296804FL6	Customer Buy	05/24/05		103.750	10	4.14%	412.50	2.50%	249.06	163.44
115	296804FL6	Customer Buy	05/24/05		103.750	20	4.14%	825.00	2.50%	498.13	326.88
116	296804FMA	DLA Buy	05/23/05	99.325	103.500	250	4.20%	417.50	2.50%	248.31	-
117	296804FMA	Customer Buy	05/24/05		103.500	10	4.20%	417.50	2.50%	248.31	169.19
118	296804FMA	Customer Buy	05/24/05		103.500	10	4.20%	417.50	2.50%	248.31	169.19
119	296804FMA	Customer Buy	05/24/05		103.500	10	4.20%	417.50	2.50%	248.31	169.19
120	296804FMA	Customer Buy	05/24/05		103.500	10	4.20%	417.50	2.50%	248.31	169.19
121	296804FMA	Customer Buy	05/24/05		103.500	15	4.20%	626.25	2.50%	372.47	253.78
122	296804FMA	Customer Buy	05/24/05		103.500	10	4.20%	417.50	2.50%	248.31	169.19
123	296804FMA	Customer Buy	05/24/05		103.000	10	3.70%	367.50	2.50%	248.31	119.19
124	296804FMA	Customer Buy	05/24/05		103.500	10	4.20%	417.50	2.50%	248.31	169.19
125	296804FMA	Customer Buy	05/24/05		103.500	10	4.20%	417.50	2.50%	248.31	169.19
126	296804FMA	Customer Buy	05/24/05		103.500	25	4.20%	1,043.75	2.50%	620.78	422.97
127	296804FMA	Customer Buy	05/24/05		103.500	35	4.20%	1,461.25	2.50%	869.09	592.16

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Markup in Dollars	Excess Markup in Dollars
128	296804FM4	Customer Buy	05/24/05		103.000	30	3.70%	1,102.50	2.50%	744.94	357.56
	296804FN2	DLA Buy	05/09/05	97.625		250				-	-
	296804FN2	DLA Buy	05/09/05	97.625		150				-	-
129	296804FN2	Customer Buy	05/09/05		101.750	40	4.23%	1,650.00	2.50%	976.25	673.75
130	296804FN2	Customer Buy	05/10/05		101.750	10	4.23%	412.50	2.50%	244.06	168.44
131	296804FN2	Customer Buy	05/10/05		101.000	20	3.46%	675.00	2.50%	488.13	186.88
132	296804FN2	Customer Buy	05/10/05		101.750	10	4.23%	412.50	2.50%	244.06	168.44
133	296804FN2	Customer Buy	05/10/05		101.750	190	4.23%	7,837.50	2.50%	4,637.19	3,200.31
134	296804FN2	Customer Buy	05/10/05		101.750	25	4.23%	1,031.25	2.50%	610.16	421.09
	296804FN2	DLA Buy	04/27/05	97.916		200				-	-
	296804FN2	DLA Buy	04/28/05	97.916		200				-	-
135	296804FN2	Customer Buy	04/28/05		102.125	40	4.30%	1,683.60	2.50%	979.16	704.44
136	296804FN2	Customer Buy	04/28/05		102.125	25	4.30%	1,052.25	2.50%	611.98	440.28
137	296804FN2	Customer Buy	04/28/05		102.125	45	4.30%	1,894.05	2.50%	1,101.56	792.50
	296804FN2	DLA Buy	06/07/05	100.325		250				-	-
138	296804FN2	Customer Buy	06/07/05		103.500	50	3.16%	1,587.50	2.50%	1,254.06	333.44
139	296804FN2	Customer Buy	06/08/05		104.500	20	4.16%	835.00	2.50%	501.63	333.37
140	296804FN2	Customer Buy	06/08/05		104.500	55	4.16%	2,296.25	2.50%	1,379.47	916.78
141	296804FN2	Customer Buy	06/08/05		104.500	125	4.16%	5,218.75	2.50%	3,138.16	2,080.59
	29680PBN9	DLA Buy	08/15/05	99.250		275				-	-
142	29680PBN9	Customer Buy	08/16/05		103.375	20	4.16%	825.00	2.50%	496.25	328.75
143	29680PBN9	Customer Buy	08/16/05		103.375	30	4.16%	1,237.50	2.50%	744.38	493.13
144	29680PBN9	Customer Buy	08/16/05		103.000	20	3.78%	750.00	2.50%	496.25	253.75
145	29680PBN9	Customer Buy	08/16/05		103.625	10	4.41%	437.50	2.50%	248.13	189.38
	303171CG5	DLA Buy	06/08/05	98.000		190				-	-
146	303171CG5	Customer Buy	06/08/05		102.125	25	4.21%	1,031.25	2.50%	612.50	418.75
	304243YT9	DLA Buy	02/14/05	101.746		100				-	-
147	304243YT9	Customer Buy	02/15/05		105.750	20	3.94%	800.80	2.00%	406.98	393.82
	356730C41	DLA Buy	11/30/06	102.847		150				-	-
148	356730C41	Customer Buy	11/30/06		106.700	50	3.75%	1,926.50	2.50%	1,286.59	640.91
149	356730C41	Customer Buy	11/30/06		106.700	100	3.75%	3,853.00	2.50%	2,571.18	1,281.83
	356730C58	DLA Buy	03/18/05	99.850		250				-	-
150	356730C58	Customer Buy	03/21/05		103.500	10	3.66%	365.00	2.50%	249.63	115.38

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	
151	356730C58	DLA Buy	02/10/06	101.361	105.240	110	3.83%	2,133.45	2.50%	-	-
152	356730C58	Customer Buy	02/10/06		105.240	55	3.83%	2,133.45	2.50%	1,393.71	739.74
153	405366DK8	DLA Buy	05/11/05	99.523	103.375	180	3.87%	4,237.20	2.50%	-	-
154	405366DK8	Customer Buy	05/12/05		103.375	110	3.87%	2,696.40	2.50%	2,736.88	1,500.32
155	405366DK8	Customer Buy	05/12/05		103.375	70	3.87%	385.20	2.50%	1,741.65	954.75
156	405366DK8	Customer Buy	05/12/05		103.375	10	3.87%	385.20	2.50%	248.81	136.39
157	405366DN2	DLA Buy	05/11/05	98.623		170				-	-
	405366DN2	DLA Buy	05/11/05	98.622		30				-	-
	405366DN2	Customer Buy	05/11/05		102.500	30	3.93%	1,163.15	2.50%	739.67	423.47
158	405366DN2	DLA Buy	05/11/05	98.622	102.500	20	3.93%	581.59	2.50%	-	-
159	405366DN2	Customer Buy	05/11/05		102.500	15	3.93%	1,938.62	2.50%	369.84	211.75
160	405366DN2	Customer Buy	05/11/05		102.500	50	3.93%	1,163.17	2.50%	1,232.78	705.84
161	405366DN2	Customer Buy	05/11/05		102.500	30	3.93%	1,744.76	2.50%	739.67	423.50
162	405366DN2	Customer Buy	05/11/05		102.500	45	3.93%	1,357.03	2.50%	1,109.51	635.25
163	405366DN2	Customer Buy	05/11/05		102.500	35	3.93%	387.72	2.50%	862.95	494.08
164	406792YG0	DLA Buy	08/01/05	98.192		150				-	-
	406792YG0	Customer Buy	08/02/05		102.375	20	4.26%	836.60	2.50%	490.96	345.64
165	406792YG0	Customer Buy	08/02/05		102.375	60	4.26%	2,509.80	2.50%	1,472.88	1,036.92
166	406792YJ4	DLA Buy	07/25/05	97.276	101.500	160	4.34%	422.40	2.50%	-	-
167	406792YJ4	Customer Buy	07/26/05		101.500	10	4.34%	1,056.00	2.50%	243.19	179.21
168	406792YJ4	Customer Buy	07/26/05		101.500	25	4.34%	422.40	2.50%	607.98	448.03
169	409095DR4	DLA Buy	11/30/06	101.958		150				-	-
	409095DR4	Customer Buy	11/30/06		105.800	50	3.77%	1,921.00	2.50%	1,274.48	646.52
170	409095DR4	Customer Buy	11/30/06		105.800	100	3.77%	3,842.00	2.50%	2,546.95	1,293.05
171	4164142T6	DLA Buy	05/31/05	98.875	102.000	100				-	-
	4164142T6	DLA Buy	05/31/05	99.000		195				-	-
172	4164142T6	Customer Buy	06/01/05		103.000	10	3.07%	304.24	2.50%	247.39	56.84
173	4164142T6	Customer Buy	06/01/05		103.000	20	4.08%	808.47	2.50%	494.79	313.69
174	4164142T6	Customer Buy	06/01/05		103.000	100	4.08%	4,042.37	2.50%	2,473.94	1,568.43
	4164142T6	Customer Buy	06/01/05		103.000	25	4.08%	1,010.59	2.50%	618.49	392.11

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup In Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
175	416414ZT6	Customer Buy	06/01/05		103.000	10	4.08%	404.24	2.50%	247.39	156.84
176	416414ZT6	Customer Buy	06/01/05		103.000	10	4.08%	404.24	2.50%	247.39	156.84
177	416414ZT6	Customer Buy	06/01/05		103.000	20	4.08%	808.47	2.50%	494.79	313.69
178	416414ZT6	Customer Buy	06/01/05		103.000	25	4.08%	1,010.59	2.50%	618.49	392.11
179	416414X88	DLA Buy	03/28/05	97.511		150				-	-
	416414X88	DLA Buy	03/29/05	97.511		150				-	-
180	416414X88	Customer Buy	03/29/05		101.625	10	4.22%	411.40	2.50%	243.78	167.62
181	416414X88	Customer Buy	03/29/05		101.625	100	4.22%	4,114.00	2.50%	2,437.78	1,676.23
182	416414X88	Customer Buy	03/29/05		100.625	25	3.19%	778.50	2.50%	609.44	169.06
183	416414X88	Customer Buy	03/29/05		101.625	40	4.22%	1,645.60	2.50%	975.11	670.49
184	416414X88	Customer Buy	03/29/05		101.625	20	4.22%	822.80	2.50%	487.56	335.25
	416414X88	Customer Buy	03/29/05		101.625	40	4.22%	1,645.60	2.50%	975.11	670.49
185	430650GB1	DLA Buy	03/11/05	98.125		150				-	-
	430650GB1	Customer Buy	03/14/05		102.000	20	3.95%	775.00	2.50%	490.63	284.38
186	443726XA7	DLA Buy	10/03/06	98.825		260				-	-
	443726XA7	Customer Buy	10/04/06		103.000	30	4.22%	1,252.50	2.50%	741.19	511.31
187	443726XA7	Customer Buy	10/04/06		102.875	15	4.10%	607.50	2.50%	370.59	236.91
188	464038GE2	DLA Buy	05/09/05	99.033		250				-	-
	464038GE2	Customer Buy	05/10/05		103.125	35	4.13%	1,432.20	2.50%	866.54	565.66
189	464038GE2	Customer Buy	05/10/05		103.125	20	4.13%	818.40	2.50%	495.17	323.24
190	464038GE2	Customer Buy	05/10/05		103.125	20	4.13%	818.40	2.50%	495.17	323.24
191	464038GE2	Customer Buy	05/10/05		103.125	20	4.13%	818.40	2.50%	495.17	323.24
192	464038GE2	Customer Buy	05/10/05		103.175	20	4.18%	828.40	2.50%	495.17	333.23
193	464038GE2	Customer Buy	05/10/05		102.125	100	3.12%	3,092.00	2.50%	2,475.83	616.17
194	464038GE2	Customer Buy	05/10/05		103.225	15	4.23%	628.80	2.50%	371.37	257.43
195	464038GE2	Customer Buy	05/10/05		103.125	10	4.13%	409.20	2.50%	247.58	161.62
196	464038GE2	DLA Buy	08/09/05	100.290		250				-	-
	464038GE2	Customer Buy	08/10/05		104.625	40	4.32%	1,734.00	2.50%	1,002.90	731.10
197	478238GH5	DLA Buy	06/27/05	99.575		250				-	-
	478238GH5	DLA Buy	06/27/05	99.575		250				-	-
198	478238GH5	Customer Buy	06/28/05		102.750	10	3.19%	317.50	2.50%	248.94	68.56
199	478238GH5	Customer Buy	06/28/05		103.750	40	4.19%	1,670.00	2.50%	995.75	674.25
200	478238GH5	Customer Buy	06/28/05		103.750	10	4.19%	417.50	2.50%	248.94	168.56
201	478238GH5	Customer Buy	06/28/05		103.750	45	4.19%	1,878.75	2.50%	1,120.22	758.53

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
202	478238GH5	Customer Buy	06/28/05		103.750	10	4.19%	417.50	2.50%	248.94	168.56
203	478238GH5	Customer Buy	06/28/05		103.750	150	4.19%	6,262.50	2.50%	3,734.06	2,528.44
204	478238GH5	Customer Buy	06/28/05		103.850	75	4.29%	3,206.25	2.50%	1,867.03	1,339.22
205	478238GK8	DLA Buy	07/25/05	99.160		500					
205	478238GK8	Customer Buy	07/26/05		103.375	15	4.25%	632.25	2.50%	371.85	260.40
206	478238GK8	Customer Buy	07/26/05		103.375	25	4.25%	1,053.75	2.50%	619.75	434.00
207	478238GK8	Customer Buy	07/26/05		103.375	25	4.25%	1,053.75	2.50%	619.75	434.00
208	478238GK8	Customer Buy	07/26/05		103.375	75	4.25%	3,161.25	2.50%	1,859.25	1,302.00
209	478238GK8	Customer Buy	07/26/05		103.375	25	4.25%	1,053.75	2.50%	619.75	434.00
210	478238GK8	Customer Buy	07/26/05		103.375	30	4.25%	1,264.50	2.50%	743.70	520.80
211	478238GK8	Customer Buy	07/26/05		102.375	10	3.24%	321.50	2.50%	247.90	73.60
212	478238GK8	Customer Buy	07/26/05		103.375	10	4.25%	421.50	2.50%	247.90	173.60
213	478238GK8	Customer Buy	07/26/05		103.375	70	4.25%	2,950.50	2.50%	1,735.30	1,215.20
214	478238GK8	Customer Buy	07/26/05		103.375	15	4.25%	632.25	2.50%	371.85	260.40
215	531116LJ8	DLA Buy	12/21/05	99.500		125					
215	531116LJ8	Customer Buy	12/21/05		103.325	10	3.84%	382.50	2.50%	248.75	133.75
216	531116LJ8	Customer Buy	12/21/05		103.325	40	3.84%	1,530.00	2.50%	995.00	535.00
217	531116LJ8	Customer Buy	12/21/05		103.325	50	3.84%	1,912.50	2.50%	1,243.75	668.75
218	531116LJ8	Customer Buy	12/21/05		103.325	25	3.84%	956.25	2.50%	621.88	334.38
219	538650GD8	DLA Buy	05/19/05	99.750		400					
219	538650GD8	Customer Buy	05/19/05		103.000	15	3.26%	487.50	2.50%	374.06	113.44
220	538650GD8	Customer Buy	05/20/05		104.000	30	4.26%	1,275.00	2.50%	748.13	526.88
221	538650GD8	Customer Buy	05/20/05		104.000	30	4.26%	1,275.00	2.50%	748.13	526.88
222	542690E24	DLA Buy	12/11/06	98.034		250					
222	542690E24	DLA Buy	12/11/06	98.034		850					
222	542690E24	Customer Buy	12/12/06		102.250	15	4.30%	632.40	2.50%	367.63	264.77
223	542690E24	Customer Buy	12/12/06		102.250	15	4.30%	632.40	2.50%	367.63	264.77
224	542690E24	Customer Buy	12/12/06		102.250	20	4.30%	843.20	2.50%	490.17	353.03
225	542690E24	Customer Buy	12/12/06		102.000	80	4.05%	3,172.80	2.50%	1,960.68	1,212.12
226	542690E24	Customer Buy	12/12/06		102.250	110	4.30%	4,637.60	2.50%	2,695.94	1,941.67
227	542690E24	Customer Buy	12/12/06		102.250	25	4.30%	1,054.00	2.50%	612.71	441.29
228	542690E24	Customer Buy	12/12/06		102.250	25	4.30%	1,054.00	2.50%	612.71	441.29
229	542690E24	Customer Buy	12/12/06		102.250	25	4.30%	1,054.00	2.50%	612.71	441.29
230	542690XW7	DLA Buy	03/13/06	99.000		500					
230	542690XW7	Customer Buy	03/14/06		103.250	20	4.28%	850.00	2.50%	495.00	355.00
231	542690XW7	Customer Buy	03/14/06		103.250	25	4.28%	1,062.50	2.50%	618.75	443.75

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
232	542690XW7	Customer Buy	03/14/06		103.250	25	4.29%	1,062.50	2.50%	618.75	443.75
233	542690XW7	Customer Buy	03/14/06		103.375	20	4.42%	875.00	2.50%	495.00	380.00
234	542690XW7	Customer Buy	03/14/06		103.375	10	4.42%	437.50	2.50%	247.50	190.00
235	542690XW7	Customer Buy	03/14/06		103.375	10	4.42%	437.50	2.50%	247.50	190.00
236	542690XW7	Customer Buy	03/14/06		103.375	85	4.42%	3,718.75	2.50%	2,103.75	1,615.00
237	542690XW7	Customer Buy	03/14/06		103.250	50	4.29%	2,125.00	2.50%	1,237.50	887.50
238	542690XW7	Customer Buy	03/14/06		103.250	15	4.29%	637.50	2.50%	371.25	266.25
239	542690XW7	Customer Buy	03/14/06		103.250	10	4.29%	425.00	2.50%	247.50	177.50
240	542690XW7	Customer Buy	03/14/06		103.250	30	4.29%	1,275.00	2.50%	742.50	532.50
241	542690YC0	DLA Buy	09/25/06	104.755		250				-	-
	542690YC0	Customer Buy	09/26/06		109.000	60	4.05%	2,547.00	2.50%	1,571.33	975.68
242	542690YC0	Customer Buy	09/26/06		109.000	75	4.05%	3,183.75	2.50%	1,964.16	1,219.59
243	542690YF3	DLA Buy	04/24/06	98.750		250				-	-
	542690YF3	Customer Buy	04/25/06		103.000	10	4.30%	425.00	2.50%	246.88	178.13
244	542690YF3	Customer Buy	04/25/06		103.000	15	4.30%	637.50	2.50%	370.31	267.19
245	542690YF3	Customer Buy	04/25/06		103.000	80	4.30%	3,400.00	2.50%	1,975.00	1,425.00
246	542690YF3	Customer Buy	04/25/06		103.000	10	4.30%	425.00	2.50%	246.88	178.13
247	542690YF3	Customer Buy	04/25/06		103.000	20	4.30%	850.00	2.50%	493.75	356.25
248	542690YF3	Customer Buy	04/25/06		103.000	10	4.30%	425.00	2.50%	246.88	178.13
249	542690YF3	Customer Buy	04/25/06		103.000	20	4.30%	850.00	2.50%	493.75	356.25
250	542690YF3	Customer Buy	04/25/06		103.000	20	4.30%	850.00	2.50%	493.75	356.25
251	542690YF3	Customer Buy	04/25/06		103.000	10	4.30%	425.00	2.50%	246.88	178.13
252	542690YF3	DLA Buy	05/04/06	97.500		250				-	-
	542690YF3	Customer Buy	05/05/06		101.750	20	4.36%	850.00	2.50%	487.50	362.50
253	542690YF3	Customer Buy	05/05/06		101.750	135	4.36%	5,737.50	2.50%	3,290.63	2,446.88
254	542690YF3	Customer Buy	05/05/06		102.000	20	4.62%	900.00	2.50%	487.50	412.50
255	542690YF3	Customer Buy	05/05/06		100.875	75	3.46%	2,531.25	2.50%	1,828.13	703.13
256	542690YF3	DLA Buy	05/08/06	97.625		250				-	-
	542690YF3	Customer Buy	05/09/06		101.875	25	4.35%	1,062.50	2.50%	610.16	452.34
257	542690YF3	DLA Buy	06/08/06	99.060		250				-	-
	542690YF3	Customer Buy	06/08/06		103.375	30	4.36%	1,294.50	2.50%	742.95	551.55
258	542690YF3	Customer Buy	06/09/06		103.375	15	4.36%	647.25	2.50%	371.48	275.78
259	542690YF3	Customer Buy	06/09/06		103.375	25	4.36%	1,078.75	2.50%	619.13	459.63
260	542690YF3	Customer Buy	06/09/06		102.375	15	3.35%	497.25	2.50%	371.48	125.78

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
261	542690YF3	DLA Buy	07/13/06	97.825	101.000	250	3.25%	952.50	2.50%	733.69	-
262	542690YF3	Customer Buy	07/14/06		102.050	15	4.32%	633.75	2.50%	366.84	218.81
263	542690YF3	Customer Buy	07/14/06		102.000	10	4.27%	417.50	2.50%	244.56	266.91
264	542690YF3	Customer Buy	07/14/06		102.000	15	4.27%	626.25	2.50%	366.84	172.94
											259.41
265	542690YF3	DLA Buy	07/18/06	97.850	102.000	250	4.24%	1,660.00	2.50%	978.50	-
266	542690YF3	Customer Buy	07/18/06		102.000	40	4.24%	8,715.00	2.50%	5,137.12	681.50
						210					3,577.88
267	565352FM8	DLA Buy	03/07/05	99.000	103.125	105	4.17%	412.50	2.50%	247.50	-
268	565352FM8	Customer Buy	03/08/05		103.125	10	4.17%	412.50	2.50%	247.50	165.00
269	565352FM8	Customer Buy	03/08/05		103.125	10	4.17%	412.50	2.50%	247.50	165.00
270	565352FM8	Customer Buy	03/08/05		103.125	30	4.17%	1,237.50	2.50%	742.50	495.00
271	59259RUT9	DLA Buy	05/02/05	101.968	106.250	250	4.20%	428.20	2.50%	254.92	-
272	59259RUT9	DLA Buy	05/02/05	101.968	106.250	225	4.20%	1,926.90	2.50%	1,147.14	173.28
273	59259RUT9	Customer Buy	05/02/05		106.250	45	4.20%	428.20	2.50%	254.92	779.76
274	59259RUT9	Customer Buy	05/03/05		106.250	10	4.20%	428.20	2.50%	254.92	173.28
275	59259RUT9	Customer Buy	05/03/05		106.250	10	4.20%	428.20	2.50%	254.92	173.28
276	59259RUT9	Customer Buy	05/03/05		106.250	10	4.20%	428.20	2.50%	254.92	173.28
277	59259RUT9	Customer Buy	05/03/05		106.250	10	4.20%	428.20	2.50%	254.92	173.28
278	59259RUT9	Customer Buy	05/03/05		106.250	45	4.20%	1,926.90	2.50%	1,147.14	779.76
279	59259RUT9	Customer Buy	05/03/05		106.250	95	4.20%	4,067.90	2.50%	2,421.74	1,646.16
280	59259RUT9	Customer Buy	05/03/05		106.250	100	4.20%	4,282.00	2.50%	2,549.20	1,732.80
281	59259RUT9	Customer Buy	05/03/05		106.500	10	4.44%	453.20	2.50%	254.92	198.28
282	59259RUX0	DLA Buy	02/17/05	99.250	103.375	250	4.16%	825.00	2.50%	496.25	-
283	59259RUX0	Customer Buy	02/17/05		103.375	20	4.16%	2,062.50	2.50%	1,240.63	328.75
284	59259RUX0	Customer Buy	02/18/05		102.375	50	3.15%	1,875.00	2.50%	1,488.75	821.88
285	59259RUX0	Customer Buy	02/18/05		102.375	60	3.15%	1,875.00	2.50%	1,488.75	386.25
286	59259RUX0	Customer Buy	02/18/05		102.375	60	3.15%	1,875.00	2.50%	1,488.75	386.25
	59259RUX0	DLA Buy	02/22/05	98.900		250				-	-
	59259RUX0	DLA Buy	02/22/05	99.000		250				-	-
	59259RUX0	DLA Buy	02/22/05	99.000		360				-	-
287	59259RUX0	Customer Buy	02/23/05		103.125	10	4.20%	415.41	2.50%	247.43	167.98

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
288	59259RUX0	Customer Buy	02/23/05		102.125	50	3.19%	1,577.03	2.50%	1,237.14	339.90
289	59259RUX0	Customer Buy	02/23/05		102.125	10	3.19%	315.41	2.50%	247.43	67.98
290	59259RUX0	Customer Buy	02/23/05		103.125	15	4.20%	623.11	2.50%	371.14	251.97
291	59259RUX0	Customer Buy	02/23/05		103.125	30	4.20%	1,246.22	2.50%	742.28	503.94
292	59259RUX0	Customer Buy	02/23/05		103.125	35	4.20%	1,453.92	2.50%	866.00	587.93
293	59259RUX0	Customer Buy	02/23/05		103.000	10	4.07%	402.91	2.50%	247.43	155.48
294	59259RUX0	Customer Buy	02/23/05		103.125	10	4.20%	415.41	2.50%	247.43	167.98
295	59259RUX0	Customer Buy	02/23/05		103.125	10	4.20%	415.41	2.50%	247.43	167.98
296	59259RUX0	Customer Buy	02/23/05		103.125	15	4.20%	623.11	2.50%	371.14	251.97
297	59259RUX0	Customer Buy	02/23/05		103.125	40	4.20%	1,661.63	2.50%	989.71	671.92
298	59259RUX0	Customer Buy	02/23/05		103.125	10	4.20%	415.41	2.50%	247.43	167.98
299	59259RUX0	Customer Buy	02/23/05		103.125	15	4.20%	623.11	2.50%	371.14	251.97
300	59259RUX0	Customer Buy	02/23/05		103.125	20	4.20%	830.81	2.50%	494.85	335.96
301	59259RUX0	Customer Buy	02/23/05		103.125	20	4.20%	830.81	2.50%	494.85	335.96
302	59259RUX0	Customer Buy	02/23/05		103.125	10	4.20%	415.41	2.50%	247.43	167.98
303	59259RUX0	Customer Buy	02/23/05		102.125	200	3.19%	6,308.14	2.50%	4,948.55	1,359.59
304	59259RUX0	DLA Buy	05/16/05	99.310		500					
305	59259RUX0	Customer Buy	05/17/05		103.500	10	4.22%	419.00	2.50%	248.28	170.73
306	59259RUX0	Customer Buy	05/17/05		103.500	20	4.22%	838.00	2.50%	496.55	341.45
307	59259RUX0	Customer Buy	05/17/05		103.500	55	4.22%	2,304.50	2.50%	1,365.51	938.99
308	59259RUX0	Customer Buy	05/17/05		103.500	45	4.22%	1,885.50	2.50%	1,117.24	768.26
309	59259RUX0	Customer Buy	05/17/05		103.500	10	4.22%	419.00	2.50%	248.28	170.73
310	59259RUX0	Customer Buy	05/17/05		103.500	15	4.22%	628.50	2.50%	372.41	256.09
311	59259RUX0	Customer Buy	05/17/05		103.500	40	4.22%	1,676.00	2.50%	993.10	682.90
312	59259RUX0	Customer Buy	05/17/05		103.500	15	4.22%	628.50	2.50%	372.41	256.09
313	59259RUX0	Customer Buy	05/17/05		103.500	25	4.22%	1,047.50	2.50%	620.69	426.81
314	59259RUX0	Customer Buy	05/17/05		103.500	40	4.22%	1,676.00	2.50%	993.10	682.90
315	59259RUX0	Customer Buy	05/17/05		103.500	15	4.22%	628.50	2.50%	372.41	256.09
316	59259RUX0	Customer Buy	05/17/05		103.500	85	4.22%	3,561.50	2.50%	2,110.34	1,451.16
317	59259RUX0	Customer Buy	05/17/05		103.500	25	4.22%	1,047.50	2.50%	620.69	426.81
318	59259RUX0	Customer Buy	05/17/05		103.550	10	4.27%	424.00	2.50%	248.28	175.73
319	59259RUX0	DLA Buy	11/21/05	97.314		250					
320	59259RUX0	Customer Buy	11/22/05		101.500	15	4.30%	627.90	2.50%	364.93	262.97
321	59259RUX0	Customer Buy	11/22/05		101.500	40	4.30%	1,674.40	2.50%	973.14	701.26
322	59259RUX0	Customer Buy	11/22/05		101.500	25	4.30%	1,046.50	2.50%	608.21	438.29
323	59259RUX0	Customer Buy	11/22/05		101.000	20	3.79%	737.20	2.50%	486.57	250.63
324	59259RUX0	Customer Buy	11/22/05		101.000	120	3.79%	4,423.20	2.50%	2,919.42	1,503.78
					101.500	20	4.30%	837.20	2.50%	486.57	350.63

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
325	59259RUX0	DLA Buy	11/28/05	97.875	102.125	500	4.34%	637.50	2.50%	367.03	-
326	59259RUX0	Customer Buy	11/29/05		102.125	15	4.34%	637.50	2.50%	367.03	270.47
327	59259RUX0	Customer Buy	11/29/05		102.125	30	4.34%	1,275.00	2.50%	734.06	540.94
328	59259RUX0	Customer Buy	11/29/05		102.125	50	4.34%	2,125.00	2.50%	1,223.44	901.56
329	59259RUX0	Customer Buy	11/29/05		102.125	15	4.34%	637.50	2.50%	367.03	270.47
330	59259RUX0	DLA Buy	08/04/05	100.250	104.500	250	4.24%	1,275.00	2.50%	-	-
331	59259RUX0	Customer Buy	08/04/05		104.000	10	3.74%	375.00	2.50%	751.88	523.13
332	59259RUX0	Customer Buy	08/04/05		104.500	80	4.24%	3,400.00	2.50%	2,005.00	1,395.00
333	59259RUX0	Customer Buy	08/05/05		103.500	40	3.24%	1,300.00	2.50%	1,002.50	297.50
334	59259RUX0	DLA Buy	05/23/06	97.625	101.375	150	3.84%	375.00	2.50%	244.06	-
335	59259RUX0	Customer Buy	05/24/06		101.500	50	3.97%	1,937.50	2.50%	1,220.31	130.94
336	59259RUY8	DLA Buy	03/31/05	95.625	100.875	500	5.07%	973.08	2.50%	-	-
337	59259RUY8	Customer Buy	03/31/05		100.875	20	5.07%	973.08	2.50%	480.05	493.03
338	59259RUY8	Customer Buy	03/31/05		100.000	60	4.16%	2,394.23	2.50%	1,440.14	954.09
339	59259RUY8	DLA Buy	06/07/05	101.000	105.250	250	4.21%	1,275.00	2.50%	-	-
340	59259RUY8	Customer Buy	06/08/05		105.250	30	4.21%	425.00	2.50%	757.50	517.50
341	59259RUY8	Customer Buy	06/08/05		105.250	30	4.21%	1,275.00	2.50%	757.50	172.50
342	59259RUY8	DLA Buy	07/05/05	99.310	103.500	250	4.22%	1,047.50	2.50%	-	-
343	59259RUY8	Customer Buy	07/06/05		103.500	20	4.22%	838.00	2.50%	620.69	426.81
344	59259RUY8	Customer Buy	07/06/05		103.500	35	4.22%	1,466.50	2.50%	486.55	341.45
345	59259RUY8	Customer Buy	07/06/05		103.500	30	4.22%	1,257.00	2.50%	868.96	597.54
346	59259RUY8	Customer Buy	07/06/05		103.000	10	3.72%	369.00	2.50%	744.83	512.17
347	59259RUY8	Customer Buy	07/06/05		103.500	30	4.22%	1,257.00	2.50%	248.28	120.73
348	59259RUY8	Customer Buy	07/06/05		103.500	30	4.22%	1,257.00	2.50%	744.83	512.17
349	59259RUY8	Customer Buy	07/06/05		103.500	20	4.22%	838.00	2.50%	744.83	512.17
350	59259RUY8	Customer Buy	07/06/05		103.500	20	4.22%	838.00	2.50%	486.55	341.45
351	59259RUY8	Customer Buy	07/06/05		103.500	20	4.22%	838.00	2.50%	486.55	341.45

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
352	59259RUY8	DLA Buy	08/02/05	100.000	104.250	500	4.25%	425.00	2.50%	250.00	-
353	59259RUY8	Customer Buy	08/02/05		104.000	10	4.00%	1,000.00	2.50%	625.00	175.00
354	59259RUY8	Customer Buy	08/02/05		104.250	25	4.25%	425.00	2.50%	250.00	375.00
355	59259RUY8	Customer Buy	08/02/05		104.250	10	4.25%	425.00	2.50%	250.00	175.00
356	59259RUY8	Customer Buy	08/02/05		104.250	50	4.25%	2,125.00	2.50%	1,250.00	875.00
357	59259RUY8	Customer Buy	08/02/05		104.250	15	4.25%	637.50	2.50%	375.00	262.50
358	59259RUY8	Customer Buy	08/02/05		104.250	10	4.25%	425.00	2.50%	250.00	175.00
359	59259RUY8	Customer Buy	08/02/05		104.250	25	4.25%	1,062.50	2.50%	625.00	437.50
360	59259RUY8	Customer Buy	08/03/05		104.250	25	4.25%	1,062.50	2.50%	625.00	437.50
361	59259RUY8	Customer Buy	08/03/05		104.000	10	4.00%	400.00	2.50%	250.00	150.00
362	59259RUY8	Customer Buy	08/03/05		103.750	55	3.75%	2,062.50	2.50%	1,375.00	687.50
363	59259RUY8	Customer Buy	08/03/05		104.250	75	4.25%	3,187.50	2.50%	1,875.00	1,312.50
364	59259RUY8	Customer Buy	08/03/05		104.300	35	4.30%	1,505.00	2.50%	875.00	630.00
365	59259RUY8	Customer Buy	08/03/05		104.250	10	4.25%	425.00	2.50%	250.00	175.00
366	59259RUY8	DLA Buy	04/26/05	98.500		250					-
367	59259RUY8	Customer Buy	04/27/05		102.625	10	4.19%	412.50	2.50%	246.25	166.25
368	59259RUY8	Customer Buy	04/27/05		102.625	25	4.19%	1,031.25	2.50%	615.63	415.63
369	59259RUY8	DLA Buy	05/11/05	99.250		65					-
370	59259RUY8	Customer Buy	05/12/05		103.100	25	3.88%	962.50	2.50%	620.31	342.19
371	59259RUY8	Customer Buy	05/12/05		103.100	40	3.88%	1,540.00	2.50%	992.50	547.50
372	59259RWX8	DLA Buy	06/22/05	98.252		280					-
373	59259RWX8	Customer Buy	06/23/05		103.000	50	4.83%	2,374.00	2.50%	1,228.15	1,145.85
374	59259RWX8	Customer Buy	06/23/05		103.000	50	4.83%	2,374.00	2.50%	1,228.15	1,145.85
375	59259RWX8	Customer Buy	06/23/05		103.000	15	4.83%	712.20	2.50%	368.45	343.75
376	59333HBA3	DLA Buy	07/19/06	99.250		65					-
377	59333HBA3	Customer Buy	07/20/06		103.000	40	3.78%	1,500.00	2.50%	992.50	507.50
378	59333HBA3	Customer Buy	07/20/06		103.000	25	3.78%	937.50	2.50%	620.31	317.19
379	59333NKK8	DLA Buy	06/27/05	69.294		385					-
380	59333NKK8	Customer Buy	06/27/05		72.125	20	4.09%	566.20	2.50%	346.47	219.73
381	59333NKK8	Customer Buy	06/27/05		72.125	40	4.09%	1,132.40	2.50%	692.94	439.46
382	59333NKK8	Customer Buy	06/27/05		72.125	30	4.09%	849.30	2.50%	519.71	329.60
383	59333NKK8	Customer Buy	06/27/05		72.125	70	4.09%	1,981.70	2.50%	1,212.65	769.06
384	59333NKK8	Customer Buy	06/28/05		72.125	100	4.09%	2,831.00	2.50%	1,732.35	1,098.65

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
380	595685JTG	DLA Buy	11/30/06	102.430	106.200	150	3.68%	3,770.00	2.50%	2,560.75	1,209.25
381	595685JTG	Customer Buy	11/30/06		106.200	50	3.68%	1,885.00	2.50%	1,280.38	604.62
382	597103QF0	DLA Buy	12/27/05	99.875	103.750	680	3.88%	387.50	2.50%	249.69	137.81
383	597103QF0	Customer Buy	12/28/05		103.750	15	3.88%	581.25	2.50%	374.53	206.72
384	597103QF0	Customer Buy	12/28/05		103.750	60	3.88%	2,325.00	2.50%	1,498.13	826.88
385	597103QF0	Customer Buy	12/28/05		103.750	50	3.88%	1,937.50	2.50%	1,248.44	689.06
386	597103QF0	Customer Buy	12/28/05		103.750	275	3.88%	10,656.25	2.50%	6,866.41	3,789.84
387	597103QF0	Customer Buy	12/28/05		103.750	30	3.88%	1,162.50	2.50%	749.06	413.44
388	597103QF0	Customer Buy	12/28/05		103.750	55	3.88%	2,131.25	2.50%	1,373.28	757.97
389	597103QF0	Customer Buy	12/28/05		103.750	185	3.88%	7,168.75	2.50%	4,619.22	2,549.53
390	600174DK9	DLA Buy	06/02/05	99.239	103.375	100	4.16%	2,065.56	2.00%	992.44	1,073.12
391	600174DK9	Customer Buy	06/02/05	99.250	103.375	50	4.16%	413.11	2.00%	198.49	214.62
392	600174DK9	Customer Buy	06/03/05		103.375	15	4.16%	619.67	2.00%	297.73	321.94
393	600174DK9	Customer Buy	06/03/05		103.375	100	4.16%	4,131.11	2.00%	1,984.88	2,146.23
394	603670MZ0	DLA Buy	11/27/06	99.500	103.800	70	4.32%	430.00	2.50%	248.75	181.25
395	603670MZ0	Customer Buy	11/28/06		103.750	25	4.27%	1,062.50	2.50%	621.88	440.63
396	61074PEK9	DLA Buy	07/20/05	99.500	103.625	250	4.15%	618.75	2.00%	298.50	320.25
397	61074PEK9	Customer Buy	07/20/05		103.625	50	4.15%	2,062.50	2.00%	995.00	1,067.50
398	61074PEM5	DLA Buy	07/12/05	98.685	102.750	150	4.12%	2,032.50	2.50%	1,233.56	798.94
399	611305HZ9	DLA Buy	04/03/06	98.250	102.500	150	4.33%	1,912.50	2.50%	1,105.31	807.19
400	611305HZ9	Customer Buy	04/03/06		101.500	50	3.31%	1,625.00	2.50%	1,228.13	396.88
401	611305HZ9	Customer Buy	04/04/06		102.500	20	4.33%	850.00	2.50%	491.25	358.75
402	611305HZ9	Customer Buy	04/04/06		102.500	20	4.33%	850.00	2.50%	491.25	358.75
403	611305HZ9	Customer Buy	04/04/06		102.500	10	4.33%	425.00	2.50%	245.63	179.38
404	611305JF1	DLA Buy	06/27/06	96.316	100.500	600	4.34%	4,184.00	2.50%	2,407.90	1,776.10
	611305JF1	Customer Buy	06/27/06			100					

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
405	611305JF1	Customer Buy	06/28/06		100.500	15	4.34%	627.80	2.50%	361.19	266.42
406	611305JF1	Customer Buy	06/28/06		100.500	20	4.34%	836.80	2.50%	481.58	355.22
407	611305JF1	Customer Buy	06/28/06		100.500	10	4.34%	418.40	2.50%	240.79	177.61
408	611305JF1	Customer Buy	06/28/06		100.000	100	3.82%	3,684.00	2.50%	2,407.90	1,276.10
409	611305JF1	Customer Buy	06/28/06		100.500	20	4.34%	836.80	2.50%	481.58	355.22
410	611305JF1	Customer Buy	06/28/06		99.750	60	3.57%	2,060.40	2.50%	1,444.74	615.66
411	611305JJ3	DLA Buy	07/17/06	100.000		250					
411	611305JJ3	Customer Buy	07/18/06		104.125	25	4.13%	1,031.25	2.50%	625.00	406.25
412	611305JJ3	Customer Buy	07/18/06		104.125	10	4.13%	412.50	2.50%	250.00	162.50
413	611305JJ3	Customer Buy	07/18/06		104.125	15	4.13%	618.75	2.50%	375.00	243.75
414	611305JJ3	Customer Buy	07/18/06		104.125	10	4.13%	412.50	2.50%	250.00	162.50
415	611305JJ3	Customer Buy	07/18/06		103.625	15	3.63%	543.75	2.50%	375.00	168.75
416	611305JJ3	Customer Buy	07/18/06		104.125	10	4.13%	412.50	2.50%	250.00	162.50
417	611305JJ3	Customer Buy	07/18/06		104.125	10	4.13%	412.50	2.50%	250.00	162.50
418	611305JJ3	Customer Buy	07/18/06		104.000	25	4.00%	1,000.00	2.50%	625.00	375.00
419	611305JJ3	Customer Buy	07/18/06		104.000	25	4.00%	1,000.00	2.50%	625.00	375.00
420	616021LC3	DLA Buy	05/05/05	98.625		250					
420	616021LC3	Customer Buy	05/06/05		102.500	10	3.93%	387.50	3.00%	295.88	91.63
421	616021LC3	Customer Buy	05/06/05		102.750	25	4.18%	1,031.25	3.00%	739.69	291.56
422	616021LC3	Customer Buy	05/06/05		101.750	20	3.17%	625.00	3.00%	591.75	33.25
423	623606TB6	DLA Buy	10/16/06	98.883		250					
423	623606TB6	Customer Buy	10/17/06		103.125	40	4.29%	1,696.80	3.00%	1,186.60	510.20
424	623606TB6	Customer Buy	10/17/06		103.125	10	4.29%	424.20	3.00%	296.65	127.55
425	623606TB6	Customer Buy	10/17/06		103.125	10	4.29%	424.20	3.00%	296.65	127.55
426	623606TB6	Customer Buy	10/17/06		103.125	15	4.29%	636.30	3.00%	444.97	191.33
427	62947YAD3	DLA Buy	12/16/05	92.903		200					
427	62947YAD3	Customer Buy	12/20/05		97.625	25	4.78%	1,112.91	3.00%	698.80	414.11
428	62947YAD3	Customer Buy	12/20/05		97.625	10	4.78%	445.16	3.00%	279.52	165.64
429	62947YAD3	Customer Buy	12/20/05	93.261		500					
429	62947YAD3	Customer Buy	12/20/05		97.625	35	4.78%	1,558.07	3.00%	976.32	579.75
430	62947YAD3	Customer Buy	12/20/05		97.625	10	4.78%	445.16	3.00%	279.52	165.64
431	62947YAD3	Customer Buy	12/20/05		97.625	25	4.78%	1,112.91	3.00%	698.80	414.11
432	62947YAD3	Customer Buy	12/20/05		97.625	10	4.78%	445.16	3.00%	279.52	165.64
433	62947YAD3	Customer Buy	12/20/05		97.625	30	4.78%	1,335.49	3.00%	838.56	496.93
434	62947YAD3	Customer Buy	12/20/05		97.625	10	4.78%	445.16	3.00%	279.52	165.64
435	62947YAD3	Customer Buy	12/20/05		97.625	10	4.78%	445.16	3.00%	279.52	165.64

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	
436	62947YAD3	Customer Buy	12/20/05		97.625	50	4.78%	2,225.81	3.00%	1,397.60	828.21
437	62947YAD3	Customer Buy	12/20/05		97.625	15	4.78%	667.74	3.00%	419.28	248.46
438	62947YAD3	DLA Buy	01/04/06	94.562		250					
439	62947YAD3	Customer Buy	01/04/06		98.750	160	4.43%	6,700.80	3.00%	4,538.98	2,161.82
440	62947YAD3	Customer Buy	01/04/06		98.750	15	4.43%	628.20	3.00%	425.53	202.67
441	62947YAD3	Customer Buy	01/04/06		98.750	30	4.43%	1,256.40	3.00%	851.06	405.34
442	62947YAD3	Customer Buy	01/04/06		98.750	35	4.43%	1,465.80	3.00%	992.90	472.90
443	62947YAD3	DLA Buy	01/26/06	97.059		195					
444	62947YAD3	Customer Buy	01/26/06		100.830	70	3.89%	2,639.70	3.00%	2,038.24	601.46
445	62947YAD3	Customer Buy	02/02/06	97.235		50					
446	63166MCB3	DLA Buy	07/05/06	97.291		60					
447	63166MCB3	Customer Buy	07/06/06		101.125	15	3.94%	575.10	3.00%	437.81	137.29
448	63166MCB3	Customer Buy	07/06/06		101.275	10	4.09%	398.40	3.00%	291.87	106.53
449	63166MCB3	Customer Buy	07/06/06		101.125	15	3.94%	597.60	3.00%	437.81	159.79
450	63166MCB3	DLA Buy	07/24/06	98.375		130					
451	63166MCB3	Customer Buy	07/25/06		102.200	45	3.89%	1,721.25	3.00%	1,328.06	393.19
452	63166MCB3	Customer Buy	07/25/06		102.200	15	3.89%	573.75	3.00%	442.69	131.06
453	63166MCB3	Customer Buy	07/25/06		101.800	15	3.48%	513.75	3.00%	442.69	71.06
454	63166MCB3	DLA Buy	04/05/06	98.500		60					
455	63166MCB3	DLA Buy	04/06/06	97.582		500					
456	63166MCB3	Customer Buy	04/06/06		101.875	25	4.29%	1,048.66	3.00%	732.60	316.06
457	63166MCB3	Customer Buy	04/06/06		101.875	15	4.29%	629.20	3.00%	425.53	202.67
458	63166MCB3	Customer Buy	04/06/06		101.870	250	4.29%	10,486.61	3.00%	7,326.03	3,160.58
459	63166MCB3	Customer Buy	04/07/06		101.875	25	4.29%	1,047.41	3.00%	732.60	314.81
460	642835KG6	DLA Buy	07/18/06	95.890		500					
461	642835KG6	Customer Buy	07/19/06		100.125	10	4.42%	423.50	2.50%	239.73	183.78
462	642835KG6	Customer Buy	07/19/06		100.000	15	4.29%	616.50	2.50%	359.59	256.91

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	
462	642835KG6	Customer Buy	07/19/06		100.125	15	4.42%	635.25	2.50%	359.59	275.66
463	642835KG6	Customer Buy	07/19/06		100.125	120	4.42%	5,082.00	2.50%	2,876.70	2,205.30
464	642835KG6	Customer Buy	07/19/06		99.625	85	3.90%	3,174.75	2.50%	2,037.66	1,137.09
465	642835KG6	Customer Buy	07/19/06		99.125	10	3.37%	323.50	2.50%	239.73	83.78
466	642835KG6	DLA Buy	06/26/06	96.007		50					
	642835KG6	DLA Buy	06/26/06	96.007		225					
	642835KG6	Customer Buy	06/27/06		100.125	15	4.29%	617.70	2.50%	360.03	257.67
	642835KG6	Customer Buy	06/27/06		100.125	100	4.29%	4,118.00	2.50%	2,400.18	1,717.82
	642835KG6	Customer Buy	06/27/06		99.732	50	3.88%	1,862.50	2.50%	1,200.09	662.41
468	642835KG6	Customer Buy	06/27/06		100.000	50	4.16%	1,996.50	2.50%	1,200.09	796.41
469	642835KG6	Customer Buy	06/27/06		100.000	20	4.16%	798.60	2.50%	480.04	318.56
470	643136SY1	DLA Buy	04/18/05	99.750		125					
471	643136SY1	Customer Buy	04/19/05		103.750	10	4.01%	400.00	2.00%	199.50	200.50
472	643136SY1	Customer Buy	04/19/05		103.750	20	4.01%	800.00	2.00%	399.00	401.00
473	643136SY1	Customer Buy	04/19/05		103.750	80	4.01%	3,200.00	2.00%	1,596.00	1,604.00
474	645020EY0	DLA Buy	04/18/05	96.750		190					
	645020EY0	Customer Buy	04/19/05		100.750	10	4.13%	400.00	2.50%	241.88	158.13
	645020EY0	Customer Buy	04/19/05		100.750	10	4.13%	400.00	2.50%	241.88	158.13
	645020EY0	Customer Buy	04/19/05		100.750	45	4.13%	1,800.00	2.50%	1,088.44	711.56
	645020EY0	Customer Buy	04/19/05		100.750	125	4.13%	5,000.00	2.50%	3,023.44	1,976.56
477	645020EY0	Customer Buy	04/19/05								
478	645020EZ7	DLA Buy	02/28/05	97.006		100					
	645020EZ7	Customer Buy	02/28/05		101.125	10	4.25%	411.90	2.50%	242.52	169.39
	645020EZ7	Customer Buy	02/28/05		101.125	15	4.25%	617.85	2.50%	363.77	254.08
479	645020FA1	DLA Buy	02/22/05	97.278		150					
480	645020FA1	Customer Buy	02/23/05		101.375	10	4.21%	409.70	2.50%	243.20	166.50
481	645020FA1	Customer Buy	02/23/05		101.375	25	4.21%	1,024.25	2.50%	607.99	416.26
482	645020FA1	Customer Buy	02/23/05		101.375	25	4.21%	1,024.25	2.50%	607.99	416.26
483	645788VA5	DLA Buy	10/24/05	98.000		400					
	645788VA5	Customer Buy	10/25/05		102.250	10	4.34%	425.00	2.00%	196.00	229.00
	645788VA5	Customer Buy	10/25/05		102.250	10	4.34%	425.00	2.00%	196.00	229.00
	645788VA5	Customer Buy	10/25/05		102.250	65	4.34%	2,762.50	2.00%	1,274.00	1,488.50
	645788VA5	Customer Buy	10/25/05		102.000	30	4.08%	1,200.00	2.00%	568.00	612.00
486	645788VA5	Customer Buy	10/25/05		102.250	10	4.34%	425.00	2.00%	196.00	229.00
487	645788VA5	Customer Buy	10/25/05		102.250	10	4.34%	425.00	2.00%	196.00	229.00
488	645788VA5	Customer Buy	10/25/05		102.250	10	4.34%	425.00	2.00%	196.00	229.00
489	645788VA5	Customer Buy	10/25/05		102.250	20	4.34%	850.00	2.00%	392.00	458.00

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max	
									Markup Percentage	Expert's Max Markup in Dollars
490	64579XBQ6 64579XBQ6	DLA Buy Customer Buy	09/19/05 09/20/05	97.125	101.250	250 20	4.25%	825.00	2.50%	485.63
491	645916XK8	DLA Buy	01/20/05	97.856	102.000	200	4.23%	828.80	2.50%	-
492	645916XK8	Customer Buy	01/20/05		102.000	50	4.23%	2,072.00	2.50%	489.28
493	645916XK8	Customer Buy	01/21/05		102.000	50	4.23%	2,072.00	2.50%	1,223.20
494	645916XK8	Customer Buy	01/21/05		101.000	80	3.21%	2,515.20	2.50%	1,223.20
495	645916XK8	DLA Buy	01/21/05	98.002		150				1,957.12
496	645916XK8	DLA Buy	03/03/05	97.500	101.625	100	4.23%	4,125.00	2.50%	-
497	645916XK8	Customer Buy	03/04/05	97.500	101.750	30	4.36%	1,275.00	2.50%	-
498	645916XK8	Customer Buy	03/04/05		101.750	50	4.36%	2,125.00	2.50%	-
499	645916XK8	DLA Buy	07/21/05	98.550	101.750	20	4.36%	850.00	2.50%	487.50
500	645916XK8	Customer Buy	07/21/05		102.875	500	3.37%	332.50	2.50%	2,437.50
501	645916XK8	Customer Buy	07/21/05		102.875	10	4.39%	432.50	2.50%	731.25
502	645916XK8	Customer Buy	07/21/05		102.875	10	4.39%	432.50	2.50%	1,218.75
503	645916XK8	Customer Buy	07/22/05		102.875	40	4.39%	1,730.00	2.50%	487.50
504	645916XK8	Customer Buy	07/22/05		102.875	60	4.39%	2,595.00	2.50%	2,437.50
505	64605L5X2 64605L5X2	DLA Buy Customer Buy	01/08/07 01/09/07	97.825	102.000	250 50	4.39%	4,325.00	2.50%	1,478.25
506	64605LB64	DLA Buy	11/07/05	96.577	100.000	150	4.39%	2,087.50	2.50%	2,463.75
507	64605LB64	Customer Buy	11/08/05		100.750	20	4.27%	834.60	2.50%	-
508	64605LB64	Customer Buy	11/08/05		100.750	40	3.54%	1,669.20	2.50%	-
509	64605LB64	Customer Buy	11/08/05		100.750	25	4.32%	1,043.25	2.50%	241.44
510	64605LB64	Customer Buy	11/08/05		100.750	15	4.32%	625.95	2.50%	965.77
511	64605LB64	Customer Buy	11/08/05		100.750	10	4.32%	417.30	2.50%	603.61
512	64605LB64	Customer Buy	11/08/05		100.750	10	4.32%	417.30	2.50%	362.16
513	64605LB64	Customer Buy	11/08/05		100.750	10	4.32%	417.30	2.50%	241.44
514	64605LB64	Customer Buy	11/08/05		100.000	20	4.32%	417.30	2.50%	241.44
515	64605LB64	Customer Buy	11/08/05		100.875	50	4.32%	684.60	2.50%	482.89
							4.45%	2,149.00	2.50%	1,207.21

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
516	64605LE38	DLA Buy	12/05/05	96.825	101.000	425	4.31%	2,087.50	2.50%	1,210.31	-
517	64605LE38	Customer Buy	12/06/05		101.000	30	4.31%	1,252.50	2.50%	726.19	877.19
518	64605LE38	Customer Buy	12/06/05		101.000	15	4.31%	626.25	2.50%	363.09	526.31
519	64605LE38	Customer Buy	12/06/05		101.000	30	4.31%	1,252.50	2.50%	726.19	263.16
520	64605LE38	Customer Buy	12/06/05		101.000	10	4.31%	417.50	2.50%	242.06	526.31
521	64605LE38	Customer Buy	12/06/05		101.000	20	4.31%	835.00	2.50%	484.13	175.44
522	64605LE38	Customer Buy	12/06/05		101.000	20	4.31%	835.00	2.50%	484.13	350.87
523	64605LE38	DLA Buy	06/14/06	97.500		250				-	-
524	64605LE38	Customer Buy	06/15/06		101.250	50	3.85%	1,875.00	2.50%	1,218.75	656.25
525	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
526	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
527	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
528	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
529	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
530	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
531	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
532	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
533	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
534	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
535	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
536	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
537	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
538	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
539	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
540	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
541	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13
542	64605LE38	Customer Buy	06/15/06		101.250	25	3.85%	937.50	2.50%	609.38	328.13

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
543	64605LH84	DLA Buy	04/17/06	96.750	99.875	250	3.23%	1,562.50	2.50%	1,209.38	-
544	64605LH84	Customer Buy	04/18/06		101.000	50	4.39%	850.00	2.50%	483.75	353.13
545	64605LH84	Customer Buy	04/18/06		101.000	20	4.39%	425.00	2.50%	241.88	366.25
546	64605LH84	Customer Buy	04/18/06		101.000	10	4.39%	2,762.50	2.50%	1,572.19	183.13
						65	4.39%				1,190.31
547	64605L TW8	DLA Buy	03/28/05	95.849		250				-	-
548	64605L TW8	DLA Buy	03/29/05	96.131		220				-	-
549	64605L TW8	Customer Buy	03/29/05		100.000	10	4.19%	401.90	2.50%	239.95	161.95
550	64605L TW8	Customer Buy	03/29/05		100.000	25	4.19%	1,004.75	2.50%	599.88	404.87
551	64605L TW8	Customer Buy	03/29/05		100.000	25	4.19%	1,004.75	2.50%	599.88	404.87
552	64605L TW8	Customer Buy	03/29/05		100.000	40	4.19%	1,607.60	2.50%	959.81	647.79
					100.000	60	4.19%	2,411.40	2.50%	1,439.72	971.68
					100.000	10	4.19%	401.90	2.50%	239.95	161.95
553	64605L TW8	DLA Buy	08/01/05	100.375		500				-	-
554	64605L TW8	Customer Buy	08/02/05		103.925	15	3.54%	532.50	2.50%	376.41	156.09
555	64605L TW8	Customer Buy	08/02/05		104.625	30	4.23%	1,275.00	2.50%	752.81	522.19
556	64605L TW8	Customer Buy	08/02/05		104.625	10	4.23%	425.00	2.50%	250.94	174.06
557	64605L TW8	Customer Buy	08/02/05		104.625	100	4.23%	4,250.00	2.50%	2,509.38	1,740.63
558	64605L TW8	Customer Buy	08/02/05		104.625	10	4.23%	425.00	2.50%	250.94	174.06
					104.625	315	4.23%	13,387.50	2.50%	7,904.53	5,482.97
559	64605L WA2	DLA Buy	07/12/05	95.557		150				-	-
560	64605L WA2	Customer Buy	07/12/05		99.750	20	4.39%	838.60	2.50%	477.79	360.82
561	64605L WA2	Customer Buy	07/12/05		98.750	40	3.34%	1,277.20	2.50%	955.57	321.63
562	64605L WA2	Customer Buy	07/13/05		99.250	10	3.86%	369.30	2.50%	238.89	130.41
					99.250	10	3.86%	369.30	2.50%	238.89	130.41
563	64605L WA2	DLA Buy	07/14/05	96.200		70				-	-
564	64605L WA2	Customer Buy	07/15/05		99.750	10	3.69%	355.00	2.50%	240.50	114.50
					99.750	60	3.69%	2,130.00	2.50%	1,443.00	687.00
565	64605L WF1	DLA Buy	09/26/05	96.712		150				-	-
566	64605L WF1	Customer Buy	09/27/05		101.000	100	4.43%	4,288.00	2.50%	2,417.80	1,870.20
					101.000	25	4.43%	1,072.00	2.50%	604.45	467.55
567	64605L WF1	DLA Buy	09/29/05	96.588		100				-	-
568	64605L WF1	Customer Buy	09/30/05		100.000	10	3.53%	341.20	2.50%	241.47	99.73
569	64605L WF1	Customer Buy	09/30/05		99.875	10	3.40%	328.70	2.50%	241.47	87.23
					100.875	10	4.44%	428.70	2.50%	241.47	187.23

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Markup in Dollars	Excess Markup in Dollars
570	64605LWF1	DLA Buy	11/01/05	93.136		250					
571	64605LWF1	Customer Buy	11/02/05		97.375	25	4.52%	1,051.75	2.50%	582.30	469.45
572	64605LWF1	Customer Buy	11/02/05		97.375	15	4.52%	631.05	2.50%	349.38	281.67
573	64605LWF1	Customer Buy	05/04/06		96.250	15	4.62%	637.50	2.50%	345.00	292.50
574	64605LWF1	Customer Buy	05/04/06		96.250	225	4.62%	9,562.50	2.50%	5,175.00	4,387.50
575	64605LWF1	Customer Buy	05/05/06		96.250	10	4.62%	425.00	2.50%	230.00	195.00
576	64605LXR4	DLA Buy	08/22/05	99.666		250					
577	64605LXR4	Customer Buy	08/23/05		103.875	25	4.22%	1,052.25	2.50%	622.91	429.34
578	64605LXR4	Customer Buy	08/23/05		103.875	15	4.22%	631.35	2.50%	373.75	257.60
579	64605LXT0	DLA Buy	08/08/05	99.125		500					
580	64605LXT0	Customer Buy	08/09/05		103.375	30	4.29%	1,275.00	2.00%	594.75	680.25
581	64605LXT0	Customer Buy	08/09/05		103.375	50	4.29%	2,125.00	2.00%	991.25	1,133.75
582	64605LXT0	Customer Buy	08/09/05		103.375	10	4.29%	425.00	2.00%	198.25	226.75
583	646136DX6	DLA Buy	06/06/06	98.050		150					
584	64966DWY1	DLA Buy	12/13/05	99.600		85					
585	64966DWY1	Customer Buy	12/13/05		103.425	15	3.84%	573.75	2.50%	373.50	200.25
586	64966DWY1	Customer Buy	12/13/05		103.425	15	3.84%	573.75	2.50%	373.50	200.25
587	64966DXN4	DLA Buy	01/06/05	99.300		30					
588	64966DXN4	DLA Buy	01/06/05	99.300		20					
589	64966DXP9	DLA Buy	03/29/05	101.788		250					
590	64966DXP9	Customer Buy	03/29/05		106.000	10	4.14%	421.20	2.50%	254.47	166.73
591	64966DXP9	Customer Buy	03/29/05		106.000	10	4.14%	421.20	2.50%	254.47	166.73
592	64966DXP9	Customer Buy	03/29/05		106.000	75	4.14%	3,159.00	2.50%	1,908.53	1,250.48

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup In Dollars
593	64966DXP9	DLA Buy	04/17/06	102.032	106.350	250	4.23%	431.80	2.50%	255.08	-
594	64966DXP9	Customer Buy	04/18/06		106.350	100	4.23%	4,318.00	2.50%	2,550.80	176.72
595	64966DXP9	Customer Buy	04/18/06		106.350	40	4.23%	1,727.20	2.50%	1,020.32	706.88
596	64966DXP9	Customer Buy	04/18/06		106.350	50	4.23%	2,159.00	2.50%	1,275.40	883.60
597	64966DXP9	Customer Buy	04/18/06		106.350	50	4.23%	2,159.00	2.50%	1,275.40	883.60
598	64966ECK1	DLA Buy	05/31/05	98.500	103.000	250	4.57%	450.00	3.00%	295.50	-
	64966ECK1	Customer Buy	06/01/05		103.000	10	4.57%	1,800.00	3.00%	1,182.00	154.50
	64966ECK1	Customer Buy	06/01/05		103.000	40	4.57%	1,800.00	3.00%	1,182.00	618.00
	64966ECK1	Customer Buy	06/01/05		103.000	25	4.57%	1,125.00	3.00%	738.75	386.25
	64966ECK1	Customer Buy	06/01/05		102.000	55	3.55%	1,925.00	3.00%	1,625.25	299.75
601	64966ECK1	Customer Buy	06/01/05		102.000	55	3.55%	1,925.00	3.00%	1,625.25	299.75
602	64966ECK1	Customer Buy	06/01/05		103.000	25	4.57%	1,125.00	3.00%	738.75	386.25
603	64966ECK1	Customer Buy	06/01/05		103.000	90	4.57%	4,050.00	3.00%	2,659.50	1,390.50
604	64966ECL9	DLA Buy	07/10/06	101.253	105.500	250	4.19%	424.70	2.50%	253.13	-
	64966ECL9	Customer Buy	07/11/06		105.500	10	4.19%	2,972.90	2.50%	1,771.93	171.57
	64966ECL9	Customer Buy	07/11/06		105.500	70	4.19%	2,972.90	2.50%	1,771.93	1,200.97
	64966ECL9	Customer Buy	07/11/06		105.500	30	4.19%	1,274.10	2.50%	759.40	514.70
	64966ECL9	Customer Buy	07/11/06		105.500	45	4.19%	1,911.15	2.50%	1,139.10	772.05
607	64966ECL9	Customer Buy	07/11/06		105.500	45	4.19%	1,911.15	2.50%	1,139.10	772.05
608	64966ECL9	Customer Buy	07/11/06		105.500	50	4.19%	2,123.50	2.50%	1,265.66	857.84
609	64966ECL9	DLA Buy	07/26/06	101.942	106.125	100	4.10%	418.30	2.50%	254.86	-
	64966ECL9	Customer Buy	07/26/06		106.125	10	4.10%	418.30	2.50%	254.86	163.45
610	64966ECL9	DLA Buy	02/23/05	103.744	107.000	150	3.14%	1,139.60	2.50%	907.76	-
	64966ECL9	Customer Buy	02/24/05		107.000	35	3.14%	1,139.60	2.50%	907.76	231.84
611	64966ECL9	DLA Buy	02/28/05	103.418	107.625	250	4.07%	1,893.15	2.50%	1,163.45	-
	64966ECL9	Customer Buy	03/01/05		107.625	45	4.07%	1,893.15	2.50%	1,163.45	729.70
	64966ECL9	Customer Buy	03/01/05		107.625	50	4.07%	2,103.50	2.50%	1,292.73	810.77
613	64966EF85	DLA Buy	06/02/05	105.632	109.750	250	3.90%	1,029.50	2.50%	660.20	-
	64966EF85	Customer Buy	06/03/05		109.750	25	3.90%	1,029.50	2.50%	660.20	369.30
614	64966EL21	DLA Buy	05/23/05	99.002	103.250	300	4.29%	637.20	2.50%	371.26	-
	64966EL21	Customer Buy	05/23/05		103.250	15	4.29%	637.20	2.50%	371.26	265.94
615	64966EL21	Customer Buy	05/24/05		103.250	20	4.29%	849.60	2.50%	495.01	354.59

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
616	64966EL54	DLA Buy	06/20/05	104.680		250				-	-
617	64966EL54	DLA Buy	06/20/05	105.014		350				-	-
618	64966EL54	Customer Buy	06/21/05		109.000	30	3.93%	1,237.55	2.50%	786.56	450.99
619	64966EL54	Customer Buy	06/21/05		109.000	45	3.93%	1,856.33	2.50%	1,179.84	676.48
620	64966EL54	Customer Buy	06/21/05		109.000	25	3.93%	1,031.29	2.50%	655.47	375.82
621	64966EL54	Customer Buy	06/21/05		109.000	70	3.93%	2,887.62	2.50%	1,836.31	1,052.31
622	64966EL54	Customer Buy	06/21/05		109.000	55	3.93%	2,268.84	2.50%	1,442.03	826.81
623	64966EL54	Customer Buy	06/21/05		109.000	100	3.93%	4,125.17	2.50%	2,621.87	1,503.30
624	64966EL54	Customer Buy	06/21/05		109.000	55	3.93%	2,268.84	2.50%	1,442.03	826.81
625	64966EL54	Customer Buy	06/21/05		109.000	50	3.93%	2,062.58	2.50%	1,310.94	751.65
626	64966EL54	Customer Buy	06/21/05		109.000	20	3.93%	825.03	2.50%	524.37	300.66
627	64966ETM9	DLA Buy	07/28/05	101.250		310				-	-
628	64966ETM9	Customer Buy	07/28/05		105.500	20	4.20%	850.00	3.00%	607.50	242.50
629	64966ETM9	Customer Buy	07/28/05		105.000	30	3.70%	1,125.00	3.00%	911.25	213.75
630	64966ETM9	Customer Buy	07/28/05		105.500	25	4.20%	1,062.50	3.00%	759.38	303.13
631	64966ETN7	DLA Buy	06/20/05	104.695		500				-	-
632	64966ETN7	Customer Buy	06/21/05		109.000	60	4.11%	2,583.00	2.50%	1,570.43	1,012.58
633	64966ETN7	Customer Buy	06/21/05		109.000	10	4.11%	430.50	2.50%	261.74	168.76
634	64966ETN7	Customer Buy	06/21/05		109.125	50	4.23%	2,215.00	2.50%	1,308.69	906.31
635	64966ETN7	Customer Buy	06/21/05		109.000	45	4.11%	1,937.25	2.50%	1,177.82	759.43
636	64966ETN7	DLA Buy	08/08/05	103.395		250				-	-
637	64966ETN7	Customer Buy	08/09/05		107.625	10	4.09%	423.00	2.50%	258.49	164.51
638	64966ETN7	Customer Buy	08/09/05		107.625	10	4.09%	423.00	2.50%	258.49	164.51
639	64966ETN7	Customer Buy	08/09/05		107.625	20	4.09%	846.00	2.50%	516.98	329.03
640	64966ETN7	Customer Buy	08/09/05		107.625	75	4.09%	3,172.50	2.50%	1,938.66	1,233.84
641	64966ETN7	Customer Buy	08/09/05		107.625	10	4.09%	423.00	2.50%	258.49	164.51
642	64966ETN7	Customer Buy	08/09/05		107.625	15	4.09%	634.50	2.50%	387.73	246.77
643	64966ETN7	Customer Buy	08/09/05		107.625	20	4.09%	846.00	2.50%	516.98	329.03
644	64966ETN7	Customer Buy	08/09/05		107.625	40	4.09%	1,692.00	2.50%	1,033.95	658.05
645	64966ETN7	Customer Buy	08/09/05		107.625	35	4.09%	1,480.50	2.50%	904.71	575.79
646	64966ETN7	Customer Buy	08/09/05		107.625	15	4.09%	634.50	2.50%	387.73	246.77

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max					
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars		
647	64966ETN7	DLA Buy	06/26/06	100.899	105.250	500	4.31%	435.10	2.50%	-	252.25	182.85	-
648	64966EUP0	DLA Buy	05/02/05	99.250	103.500	250	4.28%	425.00	2.50%	-	248.13	176.88	-
	64966EUP0	Customer Buy	05/03/05		103.500	10	4.28%	425.00	2.50%		248.13	176.88	
	64966EUP0	Customer Buy	05/03/05		103.500	10	4.28%	425.00	2.50%		248.13	176.88	
	64966EUP0	Customer Buy	05/03/05		103.500	10	4.28%	425.00	2.50%		248.13	176.88	
	64966EUP0	Customer Buy	05/03/05		103.500	30	4.28%	1,275.00	2.50%		744.38	530.63	
652	64966EUP0	Customer Buy	05/03/05		103.500	10	4.28%	425.00	2.50%		248.13	176.88	
653	64966EUP0	Customer Buy	05/03/05		103.650	25	4.43%	1,100.00	2.50%		620.31	479.69	
654	64966EUP0	Customer Buy	05/03/05		103.500	30	4.28%	1,275.00	2.50%		744.38	530.63	
656	64966EUX3	DLA Buy	04/28/05	99.900	104.125	110	4.23%	1,690.00	2.50%	-	999.00	691.00	-
	64966EUX3	Customer Buy	04/28/05		104.125	40	4.23%	1,690.00	2.50%		999.00	691.00	
	64966EUX3	Customer Buy	04/29/05		104.125	25	4.23%	1,056.25	2.50%		624.38	431.87	
659	64966EUX3	DLA Buy	05/24/05	100.900	105.125	160	4.19%	2,112.50	2.50%	-	1,261.25	851.25	-
	64966EUX3	Customer Buy	05/24/05		105.125	50	4.19%	1,267.50	2.50%		756.75	510.75	
	64966EUX3	Customer Buy	05/24/05		105.000	30	4.06%	410.00	2.50%		252.25	157.75	
	64966EUX3	Customer Buy	05/24/05		105.125	25	4.19%	1,056.25	2.50%		630.63	425.62	
	64966EUX3	Customer Buy	05/24/05		105.125	45	4.19%	1,901.25	2.50%		1,135.13	766.12	
664	64966F8L1	DLA Buy	12/26/06	97.084	101.375	600	4.42%	1,287.30	2.50%	-	728.13	559.17	-
	64966F8L1	Customer Buy	12/27/06		101.375	30	4.42%	1,287.30	2.50%		728.13	559.17	
665	64966FMM3	DLA Buy	09/20/05	97.578	101.625	325	4.15%	1,214.10	2.00%	-	585.47	628.63	-
	64966FMM3	Customer Buy	09/21/05		101.625	30	4.15%	1,214.10	2.00%		585.47	628.63	
666	64966FMM3	DLA Buy	10/20/05	96.750	100.000	100	3.36%	1,625.00	2.00%	-	967.50	657.50	-
	64966FMM3	Customer Buy	10/21/05		100.000	50	3.36%	1,625.00	2.00%		967.50	657.50	
667	64970KE78	DLA Buy	02/14/05	104.916	109.000	250	3.89%	1,021.00	2.50%	-	655.73	365.28	-
	64970KE78	Customer Buy	02/15/05		109.000	25	3.89%	1,021.00	2.50%		655.73	365.28	
668	64970KG68	DLA Buy	07/10/06	95.705	100.000	125	4.49%	1,503.25	2.50%	-	837.42	665.83	-
	64970KG68	Customer Buy	07/11/06		100.000	35	4.49%	859.00	2.50%		478.53	380.48	
669	64970KG68	Customer Buy	07/11/06		100.000	20	4.49%	859.00	2.50%		478.53	380.48	
670	64970KG68	Customer Buy	07/11/06		100.000	20	4.49%	859.00	2.50%		478.53	380.48	

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
671	64970KG68	Customer Buy	07/11/06		100.000	35	4.49%	1,503.25	2.50%	837.42	665.83
672	64970KG68	Customer Buy	07/11/06		100.000	15	4.49%	644.25	2.50%	358.89	285.36
673	64970KH83	DLA Buy	01/31/05	104.481		250					
	64970KH83	DLA Buy	01/31/05	104.540		250					
673	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
674	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
675	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
676	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
677	64970KH83	Customer Buy	02/01/05		108.625	15	3.94%	617.18	3.00%	470.30	146.88
678	64970KH83	Customer Buy	02/01/05		108.625	15	3.94%	617.18	3.00%	470.30	146.88
679	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
680	64970KH83	Customer Buy	02/01/05		108.675	10	3.98%	416.45	3.00%	313.53	102.92
681	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
682	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
683	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
684	64970KH83	Customer Buy	02/01/05		108.725	45	4.03%	1,896.53	3.00%	1,410.89	485.63
685	64970KH83	Customer Buy	02/01/05		108.625	20	3.94%	822.90	3.00%	627.06	195.84
686	64970KH83	Customer Buy	02/01/05		108.625	20	3.94%	822.90	3.00%	627.06	195.84
687	64970KH83	Customer Buy	02/01/05		108.625	20	3.94%	822.90	3.00%	627.06	195.84
688	64970KH83	Customer Buy	02/01/05		108.625	20	3.94%	822.90	3.00%	627.06	195.84
689	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
690	64970KH83	Customer Buy	02/01/05		108.625	10	3.94%	411.45	3.00%	313.53	97.92
691	64970KH83	Customer Buy	02/01/05		108.625	25	3.94%	1,028.63	3.00%	783.83	244.80
692	64970KH83	DLA Buy	07/11/05	105.820		500					
	64970KH83	Customer Buy	07/12/05		110.000	10	3.95%	418.00	3.00%	317.46	100.54
693	64970KH83	Customer Buy	07/12/05		110.000	15	3.95%	627.00	3.00%	476.19	150.81
694	64970KH83	Customer Buy	07/12/05		110.000	75	3.95%	3,135.00	3.00%	2,380.95	754.05
695	64970KH83	Customer Buy	07/12/05		109.000	10	3.01%	318.00	3.00%	317.46	0.54
696	64970KH83	Customer Buy	07/12/05		110.000	25	3.95%	1,045.00	3.00%	793.65	251.35
697	64970KH83	Customer Buy	07/12/05		110.000	50	3.95%	2,090.00	3.00%	1,587.30	502.70
698	64970KH83	Customer Buy	07/12/05		110.000	50	3.95%	2,090.00	3.00%	1,587.30	502.70
699	64970KL70	DLA Buy	09/06/05	105.810		250					
	64970KL70	Customer Buy	09/07/05		110.000	20	3.96%	838.00	2.50%	529.05	308.95
700	64970KL70	Customer Buy	09/07/05		110.000	10	3.96%	419.00	2.50%	264.53	154.48
701	64970KL70	Customer Buy	09/07/05		110.000	25	3.96%	1,047.50	2.50%	661.31	386.19

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
702	64970KL88	DLA Buy	12/21/05	101.476	105.350	325	3.82%	10,072.40	2.50%	-	-
703	64970KL88	Customer Buy	12/21/05		105.350	260	3.82%	10,072.40	2.50%	6,595.94	3,476.46
						65	3.82%	2,518.10	2.50%	1,648.99	869.11
704	64970KM38	DLA Buy	02/16/05	104.227	108.250	250	3.86%	1,005.75	2.50%	-	-
705	64970KM38	Customer Buy	02/17/05		108.125	20	3.74%	779.60	2.50%	651.42	354.33
						20				521.14	258.46
706	64970KM38	DLA Buy	03/08/05	103.134	107.125	250	3.87%	798.20	2.50%	-	-
		Customer Buy	03/09/05			20				515.67	282.53
707	64970KM38	DLA Buy	05/09/05	103.466	107.550	250	3.95%	612.60	2.50%	-	-
708	64970KM38	Customer Buy	05/10/05		107.550	15	3.95%	612.60	2.50%	388.00	224.60
						45	3.95%	1,837.80	2.50%	1,163.99	673.81
709	64970KM38	DLA Buy	05/31/05	105.038	109.300	140	4.06%	426.20	2.50%	-	-
710	64970KM38	Customer Buy	06/01/05		109.300	10	4.06%	426.20	2.50%	262.60	163.61
						10				262.60	163.61
711	64970KM46	DLA Buy	05/16/05	99.375	103.500	265	4.15%	2,062.50	2.50%	-	-
712	64970KM46	Customer Buy	05/17/05		103.500	50	4.15%	2,062.50	2.50%	1,242.19	820.31
713	64970KM46	Customer Buy	05/17/05		103.500	20	4.15%	825.00	2.50%	1,242.19	820.31
714	64970KM46	Customer Buy	05/17/05		103.500	20	4.15%	825.00	2.50%	496.88	328.13
						20				496.88	328.13
715	64972FAH9	DLA Buy	02/01/06	97.750	101.550	150	3.89%	3,800.00	2.50%	-	-
716	64972FAH9	Customer Buy	02/02/06		102.000	100	4.35%	850.00	2.50%	2,443.75	1,356.25
717	64972FAH9	Customer Buy	02/02/06		102.000	20	4.35%	850.00	2.50%	488.75	361.25
718	64972FAH9	Customer Buy	02/02/06		102.000	15	4.35%	637.50	2.50%	366.56	270.94
						15				366.56	270.94
719	64972FAH9	DLA Buy	02/08/06	98.375	102.625	350	4.32%	425.00	2.50%	-	-
720	64972FAH9	Customer Buy	02/08/06		102.625	10	4.32%	425.00	2.50%	245.94	179.06
721	64972FAH9	Customer Buy	02/08/06		102.625	15	4.32%	637.50	2.50%	245.94	179.06
722	64972FAH9	Customer Buy	02/08/06		102.625	35	4.32%	1,487.50	2.50%	368.91	268.59
723	64972FAH9	Customer Buy	02/09/06		102.625	10	4.32%	425.00	2.50%	860.78	626.72
724	64972FAH9	Customer Buy	02/09/06		102.625	10	4.32%	425.00	2.50%	245.94	179.06
725	64972FAH9	Customer Buy	02/09/06		101.625	10	3.30%	325.00	2.50%	245.94	179.06
726	64972FAH9	Customer Buy	02/09/06		102.500	25	4.19%	1,031.25	2.50%	245.94	179.06
727	64972FAH9	Customer Buy	02/09/06		102.500	10	4.19%	412.50	2.50%	614.84	416.41
						10				245.94	166.56

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
728	64972FBH8	DLA Buy	02/27/06	100.000	104.250	250	4.25%	425.00	2.50%	250.00	-
729	64972FBH8	Customer Buy	02/28/06		104.250	25	4.25%	1,062.50	2.50%	625.00	175.00
730	64972FBH8	Customer Buy	02/28/06		104.250	20	4.25%	850.00	2.50%	500.00	437.50
731	64972FBH8	Customer Buy	02/28/06		104.250	20	4.25%	850.00	2.50%	500.00	350.00
732	64972FBH8	Customer Buy	02/28/06		104.250	10	4.25%	425.00	2.50%	250.00	350.00
733	64972FBK1	DLA Buy	09/13/06	99.375	103.625	300	4.28%	8,500.00	2.50%	4,968.75	-
734	64972FBK1	Customer Buy	09/14/06		103.625	200	4.28%	2,125.00	2.50%	1,242.19	3,531.25
735	64972FBK1	DLA Buy	01/25/06	98.125	102.375	250	4.33%	425.00	2.50%	245.31	-
736	64972FBK1	Customer Buy	01/26/06		102.000	10	3.95%	775.00	2.50%	490.63	179.69
737	64972FBK1	Customer Buy	01/26/06		102.375	20	4.33%	850.00	2.50%	490.63	284.38
738	64972FBK1	Customer Buy	01/26/06		102.250	200	4.20%	8,250.00	2.50%	4,906.25	359.38
739	64972FBK1	DLA Buy	03/27/06	98.910	103.125	300	4.26%	843.00	2.50%	494.55	3,343.75
740	64972FBK1	Customer Buy	03/28/06		103.125	20	4.26%	843.00	2.50%	494.55	-
741	64972FBK1	Customer Buy	03/28/06		102.125	25	3.25%	803.75	2.50%	618.19	348.45
742	64972FBK1	Customer Buy	03/28/06		103.125	45	4.26%	1,896.75	2.50%	1,112.74	185.56
743	64972FBK1	Customer Buy	03/28/06		103.125	40	4.26%	1,686.00	2.50%	989.10	784.01
744	64972FBK1	Customer Buy	03/28/06		103.125	15	4.26%	632.25	2.50%	370.91	696.90
745	64972FBK1	Customer Buy	03/28/06		103.125	20	4.26%	843.00	2.50%	494.55	261.34
746	64972FBK1	Customer Buy	03/28/06		103.125	50	4.26%	2,107.50	2.50%	1,236.38	348.45
747	64972FBK1	Customer Buy	03/28/06		103.000	10	4.14%	409.00	2.50%	247.28	871.13
748	64972FBK1	Customer Buy	03/28/06		103.000	10	4.14%	409.00	2.50%	247.28	161.73
749	64972FBY1	DLA Buy	07/24/06	96.861	101.125	500	4.40%	1,279.20	2.50%	726.46	-
750	64972FBY1	Customer Buy	07/25/06		101.125	30	4.40%	639.60	2.50%	363.23	552.74
751	64972FBY1	Customer Buy	07/25/06		101.125	15	4.40%	852.80	2.50%	484.31	276.37
752	64972FBY1	Customer Buy	07/25/06		101.125	20	4.40%	639.60	2.50%	363.23	368.49
753	64972FBY1	Customer Buy	07/25/06		101.125	15	4.40%	639.60	2.50%	363.23	276.37
754	64972FBY1	Customer Buy	07/25/06		101.125	20	4.40%	852.80	2.50%	484.31	368.49
755	64972FBY1	Customer Buy	07/25/06		101.125	30	4.40%	1,279.20	2.50%	726.46	552.74
756	64972FBY1	Customer Buy	07/25/06		101.125	10	4.40%	426.40	2.50%	242.15	184.25
757	64972FBY1	Customer Buy	07/25/06		101.125	10	4.40%	426.40	2.50%	242.15	184.25
758	64972FBY1	Customer Buy	07/25/06		100.000	20	4.40%	852.80	2.50%	484.31	368.49
759	64972FBY1	Customer Buy	07/25/06		100.000	10	3.24%	313.90	2.50%	242.15	71.75
759	64972FBY1	Customer Buy	07/25/06		101.125	25	4.40%	1,066.00	2.50%	605.38	460.62

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA (Price/s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
760	64972FBY1	Customer Buy	07/25/06		101.125	20	4.40%	852.80	2.50%	484.31	368.49
761	64972FBY1	DLA Buy	04/03/06	97.075	101.375	305	4.43%	645.00	2.50%	364.03	-
762	64972FBY1	Customer Buy	04/04/06		101.375	20	4.43%	860.00	2.50%	485.38	374.62
763	64972FBY1	Customer Buy	04/04/06		101.375	45	4.43%	1,935.00	2.50%	1,092.09	842.91
764	64972FBY1	Customer Buy	04/04/06		101.375	20	4.43%	860.00	2.50%	485.38	374.62
765	64972FBY1	Customer Buy	04/04/06		100.000	50	3.01%	1,462.50	2.50%	1,213.44	249.06
766	64972FBY1	Customer Buy	04/04/06		101.375	55	4.43%	2,365.00	2.50%	1,334.78	1,030.22
767	64972FBY1	DLA Buy	05/01/06	96.375	100.625	500	4.41%	637.50	2.50%	361.41	-
768	64972FBY1	Customer Buy	05/02/06		100.625	15	4.41%	637.50	2.50%	361.41	276.09
769	64972FBY1	Customer Buy	05/02/06		100.625	15	4.41%	637.50	2.50%	361.41	276.09
770	64972FBY1	Customer Buy	05/02/06		100.625	50	4.41%	2,125.00	2.50%	1,204.69	920.31
771	64972FBY1	Customer Buy	05/02/06		100.775	25	4.57%	1,100.00	2.50%	602.34	497.66
772	64972FBY1	Customer Buy	05/02/06		100.625	50	4.41%	2,125.00	2.50%	1,204.69	920.31
773	64972FBY1	Customer Buy	05/02/06		100.625	40	4.41%	1,700.00	2.50%	963.75	736.25
774	64972FBY1	Customer Buy	05/02/06		100.625	10	4.41%	425.00	2.50%	240.94	184.06
775	64972FBY1	Customer Buy	05/02/06		100.625	20	4.41%	850.00	2.50%	481.88	368.13
776	64972FBY1	Customer Buy	05/02/06		100.000	50	3.76%	1,812.50	2.50%	1,204.69	607.81
777	64972FBY1	Customer Buy	05/02/06		100.625	55	4.41%	2,337.50	2.50%	1,325.16	1,012.34
778	64972FBY1	Customer Buy	05/02/06		100.625	25	4.41%	1,062.50	2.50%	602.34	460.16
779	64972FBY1	DLA Buy	05/23/06	97.625	101.875	250	4.35%	3,825.00	2.50%	2,196.56	1,628.44
780	64972FBY1	Customer Buy	05/24/06		101.875	20	4.35%	850.00	2.50%	488.13	361.88
781	64972FBY1	Customer Buy	05/24/06		101.875	20	4.35%	850.00	2.50%	488.13	361.88
782	64972FBY1	DLA Buy	06/26/06	94.800	99.000	500	4.43%	630.00	2.50%	355.50	-
783	64972FBY1	Customer Buy	06/27/06		98.000	15	3.38%	1,600.00	2.50%	1,185.00	415.00
784	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
785	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
786	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
787	64972FBY1	Customer Buy	06/27/06		99.000	50	4.43%	2,100.00	2.50%	1,185.00	915.00
788	64972FBY1	Customer Buy	06/27/06		99.000	30	4.43%	1,260.00	2.50%	711.00	549.00
789	64972FBY1	Customer Buy	06/27/06		99.000	20	4.43%	840.00	2.50%	474.00	366.00
790	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
791	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
792	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
793	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
794	64972FBY1	Customer Buy	06/27/06		99.000	25	4.43%	1,050.00	2.50%	592.50	457.50
795	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
796	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
797	64972FBY1	Customer Buy	06/27/06		99.000	55	4.43%	2,310.00	2.50%	1,303.50	1,006.50
798	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
799	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
800	64972FBY1	Customer Buy	06/27/06		99.000	65	4.43%	2,730.00	2.50%	1,540.50	1,189.50
801	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
802	64972FBY1	Customer Buy	06/27/06		99.000	20	4.43%	840.00	2.50%	474.00	366.00
803	64972FBY1	Customer Buy	06/27/06		99.000	25	4.43%	1,050.00	2.50%	592.50	457.50
804	64972FBY1	Customer Buy	06/27/06		99.000	25	4.43%	1,050.00	2.50%	592.50	457.50
805	64972FBY1	Customer Buy	06/27/06		99.000	25	4.43%	1,050.00	2.50%	592.50	457.50
806	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
807	64972FBY1	Customer Buy	06/27/06		99.000	50	4.43%	2,100.00	2.50%	1,185.00	915.00
808	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
809	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
810	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
811	64972FBY1	Customer Buy	06/27/06		99.000	10	4.43%	420.00	2.50%	237.00	183.00
812	64972FBY1	Customer Buy	06/27/06		99.000	15	4.43%	630.00	2.50%	355.50	274.50
813	64972FBY1	Customer Buy	06/27/06		99.000	60	4.43%	2,520.00	2.50%	1,422.00	1,098.00
814	64972FBY1	Customer Buy	06/27/06		99.000	20	4.43%	840.00	2.50%	474.00	366.00
815	64972FBZ8	DLA Buy	07/06/06	97.750		300				-	-
	64972FBZ8	DLA Buy	07/06/06	97.750		175				-	-
816	64972FBZ8	Customer Buy	07/06/06		101.000	140	3.32%	4,550.00	2.50%	3,421.25	1,128.75
817	64972FBZ8	Customer Buy	07/06/06		101.000	60	3.32%	1,950.00	2.50%	1,466.25	483.75
818	64972FBZ8	Customer Buy	07/07/06		102.000	50	4.35%	2,125.00	2.50%	1,221.88	903.13
	64972FBZ8	Customer Buy	07/07/06		101.500	10	3.84%	375.00	2.50%	244.38	130.63
819	64972FBZ8	DLA Buy	04/17/06	99.375		1000				-	-
	64972FBZ8	Customer Buy	04/18/06		103.625	25	4.28%	1,062.50	2.50%	621.09	441.41
820	64972FBZ8	Customer Buy	04/18/06		103.625	15	4.28%	637.50	2.50%	372.66	264.84
821	64972FBZ8	Customer Buy	04/18/06		103.625	25	4.28%	1,062.50	2.50%	621.09	441.41
822	64972FBZ8	Customer Buy	04/18/06		103.625	50	4.28%	2,125.00	2.50%	1,242.19	882.81
823	64972FBZ8	Customer Buy	04/18/06		103.625	45	4.28%	1,912.50	2.50%	1,117.97	794.53
824	64972FBZ8	Customer Buy	04/18/06		103.625	10	4.28%	425.00	2.50%	248.44	176.56
825	64972FBZ8	Customer Buy	04/18/06		103.750	50	4.40%	2,187.50	2.50%	1,242.19	945.31

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
826	64972FFS0	DLA Buy	07/20/06	96.872	101.000	500	4.26%	825.60	3.00%	581.23	244.37
827	64972FFS0	Customer Buy	07/21/06		101.000	20	4.26%	825.60	3.00%	581.23	244.37
828	64972FFS0	Customer Buy	07/21/06		101.000	30	4.26%	1,238.40	3.00%	871.85	366.55
829	64972FFS0	Customer Buy	07/21/06		101.000	25	4.26%	1,032.00	3.00%	726.54	305.46
830	64972FFS0	Customer Buy	07/21/06		101.000	20	4.26%	825.60	3.00%	581.23	244.37
831	64972FFS0	Customer Buy	07/21/06		101.000	25	4.26%	1,032.00	3.00%	726.54	305.46
832	64972FFS0	Customer Buy	07/21/06		101.000	20	4.26%	825.60	3.00%	581.23	244.37
833	64972FFS0	Customer Buy	07/21/06		101.125	10	4.39%	425.30	3.00%	290.62	134.68
834	64972FFS0	Customer Buy	07/21/06		99.875	70	3.10%	2,102.10	3.00%	2,034.31	67.79
835	649787M21	DLA Buy	03/07/05	98.381	102.500	250	4.19%	1,029.75	2.50%	614.88	414.87
836	649787M21	Customer Buy	03/08/05		102.500	10	4.19%	411.90	2.50%	245.95	165.95
837	649787M21	Customer Buy	03/08/05		102.500	50	4.19%	2,059.50	2.50%	1,229.76	829.74
838	649787M21	Customer Buy	03/08/05		102.500	25	4.19%	1,029.75	2.50%	614.88	414.87
839	649787M21	Customer Buy	03/08/05		102.500	15	4.19%	617.85	2.50%	368.93	248.92
840	649787M21	Customer Buy	03/08/05		102.500	40	4.19%	1,647.60	2.50%	983.81	663.79
841	649787M21	Customer Buy	03/08/05		102.625	10	4.31%	424.40	2.50%	245.95	178.45
842	649787M21	DLA Buy	03/21/05	97.500	100.625	500	3.21%	2,343.75	2.50%	1,828.13	515.63
843	649787M21	Customer Buy	03/22/05		101.625	75	4.23%	5,156.25	2.50%	3,046.88	2,109.38
844	649787M21	Customer Buy	03/22/05		101.625	15	4.23%	618.75	2.50%	365.63	253.13
845	649787M21	Customer Buy	03/22/05		101.625	25	4.23%	1,031.25	2.50%	609.38	421.88
846	649787M21	Customer Buy	03/22/05		101.625	15	4.23%	618.75	2.50%	365.63	253.13
847	649787M21	Customer Buy	03/22/05		101.625	20	4.23%	825.00	2.50%	487.50	337.50
848	649787M21	Customer Buy	03/22/05		101.000	30	3.59%	1,050.00	2.50%	731.25	318.75
849	649787M21	Customer Buy	03/22/05		101.625	20	4.23%	825.00	2.50%	487.50	337.50
850	649787M21	Customer Buy	03/22/05		101.625	50	4.23%	2,062.50	2.50%	1,218.75	843.75
851	649787M21	DLA Buy	03/29/05	96.550	100.625	250	4.22%	2,037.50	2.50%	1,206.88	830.63
852	649787M21	Customer Buy	03/29/05		100.000	15	3.57%	517.50	2.50%	362.06	155.44
853	649787M21	Customer Buy	03/29/05		100.000	35	3.57%	1,207.50	2.50%	844.81	362.69
854	649787M21	Customer Buy	03/29/05		100.625	10	4.22%	407.50	2.50%	241.38	166.13
855	649787M21	Customer Buy	03/30/05		100.625	15	4.22%	611.25	2.50%	362.06	249.19
856	649787M21	Customer Buy	03/30/05		100.625	40	4.22%	1,630.00	2.50%	965.50	664.50
857	649787M21	DLA Buy	04/13/05	97.500	101.750	500	4.36%	2,125.00	2.50%	1,218.75	906.25

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
858	649787M21	Customer Buy	04/13/05		101.750	60	4.36%	2,550.00	2.50%	1,462.50	1,087.50
859	649787M21	Customer Buy	04/14/05		101.750	20	4.36%	850.00	2.50%	487.50	362.50
860	649787M21	Customer Buy	04/14/05		102.500	10	5.13%	500.00	2.50%	243.75	256.25
861	649787M21	Customer Buy	04/14/05		102.500	10	5.13%	500.00	2.50%	243.75	256.25
862	649787M21	DLA Buy	08/23/05	100.250		1000					
863	649787M21	Customer Buy	08/23/05		104.500	10	4.24%	425.00	2.50%	250.63	174.38
864	649787M21	Customer Buy	08/23/05		104.500	10	4.24%	425.00	2.50%	250.63	174.38
865	649787M21	Customer Buy	08/23/05		104.500	65	4.24%	2,762.50	2.50%	1,629.06	1,133.44
866	649787M21	Customer Buy	08/23/05		104.500	30	4.24%	1,275.00	2.50%	751.88	523.13
867	649787M21	Customer Buy	08/24/05		104.500	15	4.24%	637.50	2.50%	375.94	261.56
867	649787M21	Customer Buy	08/24/05		104.500	25	4.24%	1,062.50	2.50%	626.56	435.94
868	649787Q68	DLA Buy	03/03/05	94.170		500					
869	649787Q68	Customer Buy	03/03/05		98.500	10	4.60%	433.00	2.50%	235.43	197.58
870	649787Q68	Customer Buy	03/03/05		98.500	10	4.60%	433.00	2.50%	235.43	197.58
871	649787Q68	Customer Buy	03/03/05		98.000	20	4.07%	766.00	2.50%	470.85	295.15
872	649787Q68	Customer Buy	03/03/05		98.500	20	4.60%	866.00	2.50%	470.85	395.15
873	649787Q68	Customer Buy	03/03/05		98.500	10	4.60%	433.00	2.50%	235.43	197.58
874	649787Q68	Customer Buy	03/03/05		98.500	10	4.60%	433.00	2.50%	235.43	197.58
875	649787Q68	Customer Buy	03/03/05		98.500	50	4.60%	2,165.00	2.50%	1,177.13	987.88
876	649787Q68	Customer Buy	03/03/05		98.500	45	4.60%	1,948.50	2.50%	1,056.41	889.09
877	649787Q68	Customer Buy	03/03/05		98.500	50	4.60%	2,165.00	2.50%	1,177.13	987.88
878	649787Q68	Customer Buy	03/03/05		97.500	100	3.54%	3,330.00	2.50%	2,354.25	975.75
879	649787Q68	Customer Buy	03/03/05		98.500	10	4.60%	433.00	2.50%	235.43	197.58
880	649787Q68	Customer Buy	03/03/05		98.500	15	4.60%	649.50	2.50%	353.14	296.36
881	649787Q68	Customer Buy	03/03/05		98.500	25	4.60%	1,082.50	2.50%	588.56	493.94
882	649787Q68	Customer Buy	03/04/05		98.000	20	4.07%	766.00	2.50%	470.85	295.15
883	649787Q68	Customer Buy	03/04/05		98.000	20	4.07%	766.00	2.50%	470.85	295.15
884	649787Q68	Customer Buy	03/04/05		98.500	20	4.60%	866.00	2.50%	470.85	395.15
885	649787Q68	Customer Buy	03/04/05		98.500	25	4.60%	1,082.50	2.50%	588.56	493.94
886	649787Q68	Customer Buy	03/04/05		98.500	10	4.60%	433.00	2.50%	235.43	197.58
887	649787Q68	Customer Buy	03/04/05		98.500	10	4.60%	433.00	2.50%	235.43	197.58
888	649787W79	DLA Buy	03/27/06	96.272		920					
889	649787W79	Customer Buy	03/28/06		100.625	50	4.52%	2,176.50	2.50%	1,203.40	973.10
890	649787W79	Customer Buy	03/28/06		100.625	15	4.52%	652.95	2.50%	361.02	291.93
891	649787W79	Customer Buy	03/28/06		100.625	15	4.52%	652.95	2.50%	361.02	291.93
892	649787W79	Customer Buy	03/28/06		100.625	10	4.52%	435.30	2.50%	240.68	194.62
892	649787W79	Customer Buy	03/28/06		100.625	25	4.52%	1,088.25	2.50%	601.70	486.55

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
893	649787W79	Customer Buy	03/28/06		100.625	15	4.52%	652.95	2.50%	361.02	291.93
894	649787W79	Customer Buy	03/28/06		100.000	30	3.87%	1,118.40	2.50%	722.04	396.36
895	649787W79	Customer Buy	03/28/06		100.625	15	4.52%	652.95	2.50%	361.02	291.93
896	649787W79	Customer Buy	03/28/06		100.625	50	4.52%	2,176.50	2.50%	1,203.40	973.10
897	649787W79	Customer Buy	03/28/06		100.000	10	3.87%	372.80	2.50%	240.68	132.12
898	649787W79	Customer Buy	03/28/06		100.500	35	4.39%	1,479.80	2.50%	842.38	637.42
899	649787W79	Customer Buy	03/28/06		100.275	25	4.16%	1,000.75	2.50%	601.70	399.05
900	649787W79	Customer Buy	03/28/06		100.625	25	4.52%	1,088.25	2.50%	601.70	486.55
901	64983QPV5	DLA Buy	11/21/05	98.250		250				-	-
901	64983QPV5	Customer Buy	11/22/05		102.375	10	4.20%	412.50	2.50%	245.63	166.88
902	64983QPV5	Customer Buy	11/22/05		101.375	50	3.18%	1,562.50	2.50%	1,228.13	334.38
903	64983QS67	DLA Buy	07/06/06	94.832		70				-	-
903	64983QS67	Customer Buy	07/07/06		99.500	20	4.92%	933.60	2.50%	474.16	459.44
904	64983QS67	Customer Buy	07/07/06		99.500	20	4.92%	933.60	2.50%	474.16	459.44
905	64983QS91	DLA Buy	08/14/06	101.328		500				-	-
905	64983QS91	Customer Buy	08/15/06		105.500	10	4.12%	417.20	2.50%	253.32	163.88
906	64983QS91	Customer Buy	08/15/06		105.500	15	4.12%	625.80	2.50%	379.98	245.82
907	64983QS91	Customer Buy	08/15/06		105.500	10	4.12%	417.20	2.50%	253.32	163.88
908	64983QS91	Customer Buy	08/15/06		104.500	25	3.13%	793.00	2.50%	633.30	159.70
909	64983QS91	Customer Buy	08/15/06		105.750	20	4.36%	884.40	2.50%	506.64	377.76
910	64983R5Q6	DLA Buy	10/17/05	97.125		200				-	-
910	64983R5Q6	Customer Buy	10/18/05		101.375	25	4.38%	1,062.50	2.50%	607.03	455.47
911	64983R5Q6	Customer Buy	10/18/05		101.375	25	4.38%	1,062.50	2.50%	607.03	455.47
912	64983R5Q6	Customer Buy	10/18/05		101.375	25	4.38%	1,062.50	2.50%	607.03	455.47
913	64983R5Q6	Customer Buy	10/18/05		100.375	10	3.35%	325.00	2.50%	242.81	82.19
914	64983R5Q6	Customer Buy	10/18/05		100.375	10	3.35%	325.00	2.50%	242.81	82.19
915	64983R5Q6	Customer Buy	10/18/05		101.375	20	4.38%	850.00	2.50%	485.63	364.38
916	64983R5Q6	Customer Buy	10/18/05		100.375	10	3.35%	325.00	2.50%	242.81	82.19
917	64983R5Q6	Customer Buy	10/18/05		101.375	25	4.38%	1,062.50	2.50%	607.03	455.47
918	64983R5Q6	Customer Buy	10/18/05		101.375	10	4.38%	425.00	2.50%	242.81	182.19
919	64983R5Q6	DLA Buy	01/09/06	99.125		500				-	-
919	64983R5Q6	Customer Buy	01/10/06		103.375	50	4.29%	2,125.00	2.50%	1,239.06	885.94
920	64983R5Q6	Customer Buy	01/10/06		103.375	10	4.29%	425.00	2.50%	247.81	177.19
921	64983R5Q6	Customer Buy	01/10/06		103.375	10	4.29%	425.00	2.50%	247.81	177.19
922	64983R5Q6	Customer Buy	01/10/06		103.375	25	4.29%	1,062.50	2.50%	619.53	442.97
923	64983R5Q6	Customer Buy	01/10/06		103.375	50	4.29%	2,125.00	2.50%	1,239.06	885.94

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
924	64983R5Q6	Customer Buy	01/10/06		103.375	200	4.29%	8,500.00	2.50%	4,956.25	3,543.75
925	64983R5Q6	Customer Buy	01/10/06		103.375	50	4.29%	2,125.00	2.50%	1,239.06	885.94
926	64983R5Q6	Customer Buy	01/10/06		103.000	15	3.91%	581.25	2.50%	371.72	209.53
927	64983R5Q6	Customer Buy	01/10/06		103.250	65	4.16%	2,681.25	2.50%	1,610.78	1,070.47
928	64983R7M3	DLA Buy	12/01/05	98.309		220				-	-
	64983R7M3	Customer Buy	12/02/05		103.000	25	4.77%	1,172.75	2.00%	491.55	681.21
929	64983R7M3	Customer Buy	12/02/05		102.000	10	3.75%	369.10	2.00%	196.62	172.48
930	64985W8X5	DLA Buy	06/27/05	100.500		250				-	-
	64985W8X5	Customer Buy	06/28/05		104.750	10	4.23%	425.00	2.00%	201.00	224.00
931	64985W8X5	Customer Buy	06/28/05		104.750	10	4.23%	425.00	2.00%	201.00	224.00
932	64985W8X5	Customer Buy	06/28/05		104.750	150	4.23%	6,375.00	2.00%	3,015.00	3,360.00
933	64985W8X5	Customer Buy	06/28/05		104.750	15	4.23%	637.50	2.00%	301.50	336.00
934	64985WMH4	DLA Buy	12/20/05	101.539		125				-	-
	64985WMH4	Customer Buy	12/20/05		105.400	15	3.80%	579.15	2.50%	380.77	198.38
935	64985WMH4	Customer Buy	12/20/05		105.400	10	3.80%	386.10	2.50%	253.85	132.25
936	64985WMH4	Customer Buy	12/20/05		105.400	10	3.80%	386.10	2.50%	253.85	132.25
937	64985WMH4	Customer Buy	12/20/05		105.400	70	3.80%	2,702.70	2.50%	1,776.93	925.77
938	64985WMH4	Customer Buy	12/20/05		105.400	20	3.80%	772.20	2.50%	507.70	264.51
939	64985WT53	DLA Buy	01/24/06	102.400		65				-	-
	64985WT53	Customer Buy	01/24/06		106.275	40	3.78%	1,550.00	2.00%	819.20	730.80
940	64985WT53	Customer Buy	01/24/06		106.275	25	3.78%	968.75	2.00%	512.00	456.75
941	64985YCU2	DLA Buy	02/15/06	98.264		115				-	-
	64985YCU2	Customer Buy	02/16/06		102.100	25	3.90%	959.00	2.50%	614.15	344.85
942	64985YCU2	Customer Buy	02/16/06		102.100	90	3.90%	3,452.40	2.50%	2,210.94	1,241.46
943	64986AGT2	DLA Buy	02/03/05	98.875		170				-	-
	64986AGT2	Customer Buy	02/03/05		102.875	50	4.05%	2,000.00	2.50%	1,235.94	764.06
944	64986AGT2	Customer Buy	02/04/05		103.500	60	4.68%	2,775.00	2.50%	1,483.13	1,291.88
945	64986AGT2	DLA Buy	02/28/05	98.825		250				-	-
	64986AGT2	DLA Buy	02/28/05	98.575		640				-	-
946	64986AGT2	Customer Buy	02/28/05		102.000	20	3.40%	670.96	2.50%	493.23	177.73
947	64986AGT2	Customer Buy	02/28/05		102.875	25	4.29%	1,057.44	2.50%	616.53	440.91
948	64986AGT2	Customer Buy	02/28/05		102.875	25	4.29%	1,057.44	2.50%	616.53	440.91
949	64986AGT2	Customer Buy	02/28/05		102.875	25	4.29%	1,057.44	2.50%	616.53	440.91

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max		
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars
950	64986AGT2	Customer Buy	02/28/05		102.875	10	4.29%	422.98	2.50%	246.61
951	64986AGT2	Customer Buy	02/28/05		102.875	20	4.29%	845.96	2.50%	493.23
952	64986AGT2	Customer Buy	02/28/05		102.875	10	4.29%	422.98	2.50%	246.61
953	64986AGT2	Customer Buy	02/28/05		102.875	40	4.29%	1,691.91	2.50%	986.45
954	64986AGT2	Customer Buy	02/28/05		102.875	50	4.29%	2,114.89	2.50%	1,233.07
955	64986AGT2	Customer Buy	02/28/05		102.875	50	4.29%	2,114.89	2.50%	1,233.07
956	64986AGT2	Customer Buy	02/28/05		102.875	10	4.29%	422.98	2.50%	246.61
957	64986AGT2	Customer Buy	02/28/05		102.875	25	4.29%	1,057.44	2.50%	616.53
958	64986AGT2	Customer Buy	03/01/05		101.875	20	3.27%	645.96	2.50%	493.23
959	64986AGT2	Customer Buy	03/01/05		102.875	25	4.29%	1,057.44	2.50%	616.53
960	64986AGT2	Customer Buy	03/01/05		102.875	50	4.29%	2,114.89	2.50%	1,233.07
961	64986AGT2	Customer Buy	03/01/05		102.875	50	4.29%	2,114.89	2.50%	1,233.07
962	64986AGT2	Customer Buy	03/01/05		101.875	25	3.27%	807.44	2.50%	616.53
963	64986AGT2	Customer Buy	03/01/05		102.875	10	4.29%	422.98	2.50%	246.61
964	64986AGT2	Customer Buy	03/01/05		102.875	15	4.29%	634.47	2.50%	369.92
965	64986AGT2	Customer Buy	03/01/05		102.875	15	4.29%	634.47	2.50%	369.92
966	64986AGT2	DLA Buy	03/14/05	97.875		150				
967	64986AGT2	Customer Buy	03/14/05		102.000	25	4.21%	1,031.25	2.50%	611.72
968	64986AGT2	Customer Buy	03/14/05		102.000	50	4.21%	2,062.50	2.50%	1,223.44
969	64986AGT2	Customer Buy	03/15/05		102.000	25	4.21%	1,031.25	2.50%	611.72
970	64986AGT2	Customer Buy	03/15/05		102.000	25	4.21%	1,031.25	2.50%	611.72
971	64986AGT2	Customer Buy	03/15/05		102.000	10	4.21%	412.50	2.50%	244.69
972	64986AKR1	DLA Buy	09/29/05	95.073		130				
973	64986AKR1	Customer Buy	09/29/05		99.539	95	4.70%	4,242.70	2.50%	2,257.98
974	64986AKR1	Customer Buy	09/30/05		98.539	10	3.65%	346.60	2.50%	237.68
975	64986AKW0	DLA Buy	06/07/06	96.780		55				
976	64986AKW0	Customer Buy	06/07/06		100.000	35	3.33%	1,127.00	2.50%	846.83
977	64986ANP2	DLA Buy	07/06/06	95.013		250				
978	64986ANP2	Customer Buy	07/06/06		99.375	50	4.59%	2,181.00	2.50%	1,187.66
979	64986ANP2	Customer Buy	07/07/06		99.375	50	4.59%	2,181.00	2.50%	1,187.66
980	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
981	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
982	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
983	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
984	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
985	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
986	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
987	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
988	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
989	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
990	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
991	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
992	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
993	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
994	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
995	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
996	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
997	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
998	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
999	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06
1000	64986ANP2	Customer Buy	06/20/06		100.500	50	4.59%	2,207.50	2.50%	1,201.06

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
981	64986ANP2	Customer Buy	06/20/06		100.500	25	4.59%	1,103.75	2.50%	600.53	503.22
982	64986ANP2	Customer Buy	06/20/06		100.550	40	4.65%	1,786.00	2.50%	960.85	825.15
983	64986ANP2	Customer Buy	06/20/06		100.500	100	4.59%	4,415.00	2.50%	2,402.13	2,012.88
984	649901U86	DLA Buy	04/10/06	96.777		250				-	-
985	649901U86	Customer Buy	04/11/06		101.000	20	4.36%	844.60	2.50%	483.89	360.72
986	649901U86	Customer Buy	04/11/06		101.000	25	4.36%	1,055.75	2.50%	604.86	450.89
987	649901U86	Customer Buy	04/11/06		101.000	30	4.36%	1,266.90	2.50%	725.83	541.07
988	649901U86	Customer Buy	04/11/06		101.000	10	4.36%	422.30	2.50%	241.94	180.36
989	649902AE3	DLA Buy	02/14/05	98.221		500				-	-
990	649902AE3	Customer Buy	02/15/05		102.250	20	4.10%	805.80	2.00%	392.88	412.92
991	649902AE3	Customer Buy	02/15/05		102.250	25	4.10%	1,007.25	2.00%	491.11	516.15
992	649902AE3	Customer Buy	02/15/05		102.250	30	4.10%	1,208.70	2.00%	589.33	619.37
993	649902AE3	Customer Buy	02/15/05		102.250	50	4.10%	2,014.50	2.00%	982.21	1,032.29
994	649902AE3	Customer Buy	02/15/05		102.250	10	4.10%	402.90	2.00%	196.44	206.46
995	649902AE3	Customer Buy	02/15/05		102.250	15	4.10%	604.35	2.00%	294.66	309.69
996	649902AE3	Customer Buy	02/15/05		102.250	10	4.10%	402.90	2.00%	196.44	206.46
997	649902AE3	Customer Buy	02/15/05		102.250	25	4.10%	1,007.25	2.00%	491.11	516.15
998	649902AE3	Customer Buy	02/15/05		102.250	40	4.10%	1,611.60	2.00%	785.77	825.83
999	6500345Z0	DLA Buy	08/18/05	107.755		90				-	-
1000	6500345Z0	Customer Buy	08/18/05		111.630	45	3.60%	1,743.75	2.00%	969.80	773.96
1001	6500348G9	DLA Buy	12/20/05	99.000		60				-	-
1002	6500348G9	Customer Buy	12/20/05		102.825	35	3.86%	1,338.75	2.50%	866.25	472.50
1003	6688435R2	DLA Buy	07/05/06	98.369		150				-	-
1004	6688435R2	Customer Buy	07/06/06		102.925	10	4.63%	455.60	2.50%	245.92	209.68
1005	6688435R2	Customer Buy	07/06/06		102.875	30	4.58%	1,351.80	2.50%	737.77	614.03
1006	6688435R2	Customer Buy	07/06/06		102.875	55	4.58%	2,478.30	2.50%	1,352.57	1,125.73
1007	6688435R2	Customer Buy	07/06/06		102.875	30	4.58%	1,351.80	2.50%	737.77	614.03
1008	6688435R2	Customer Buy	07/06/06		102.875	25	4.58%	1,126.50	2.50%	614.81	511.69
1008	6688435R2	Customer Buy	07/06/06		102.875	60	4.58%	2,703.60	2.50%	1,475.54	1,228.07

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
1009	702750AR1	DLA Buy	05/31/05	99.875	104.000	250	4.13%	2,268.75	2.50%	1,373.28	-
1010	702750AR1	Customer Buy	06/01/05		103.250	15	3.38%	506.25	2.50%	374.53	895.47
1011	702750AR1	Customer Buy	06/01/05		104.000	20	4.13%	825.00	2.50%	499.38	131.72
1012	702750AR1	Customer Buy	06/01/05		104.000	25	4.13%	1,031.25	2.50%	624.22	325.63
1013	702750AR1	Customer Buy	06/01/05		104.000	10	4.13%	412.50	2.50%	249.69	407.03
1014	702750AR1	Customer Buy	06/01/05		104.000	10	4.13%	412.50	2.50%	249.69	162.81
1015	702750AR1	Customer Buy	06/01/05		104.000	15	4.13%	618.75	2.50%	374.53	162.81
1016	702750AR1	Customer Buy	06/01/05		104.125	30	4.26%	1,275.00	2.50%	749.06	244.22
1017	702750AR1	Customer Buy	06/01/05		104.250	35	4.38%	1,531.25	2.50%	873.91	525.94
1018	73358TCR0	DLA Buy	02/21/06	104.728		585				-	-
	73358TCR0	Customer Buy	02/22/06		109.000	10	4.08%	427.20	2.50%	261.82	165.38
1019	73358TEB3	DLA Buy	06/30/05	99.875	103.750	500	3.88%	387.50	2.50%	249.69	-
1020	73358TEB3	Customer Buy	07/01/05		103.625	10	3.75%	750.00	2.50%	499.38	137.81
1021	73358TEB3	Customer Buy	07/01/05		103.250	20	3.38%	675.00	2.50%	499.38	250.63
1022	73358TEB3	Customer Buy	07/01/05		104.125	40	4.26%	1,700.00	2.50%	998.75	175.63
1023	73358TEB3	Customer Buy	07/01/05		104.250	10	4.38%	437.50	2.50%	249.69	701.25
1024	73358TEK3	DLA Buy	04/29/05	104.139		250				-	-
	73358TEK3	Customer Buy	05/02/05		108.250	35	3.95%	1,438.85	2.00%	728.97	709.88
1025	73358TKR1	DLA Buy	01/07/05	97.365	101.500	250	4.25%	413.50	2.50%	243.41	-
	73358TKR1	Customer Buy	01/10/05		101.500	10	4.25%	413.50	2.50%	243.41	170.09
1026	73358TKR1	Customer Buy	01/10/05		100.500	30	3.22%	940.50	2.50%	730.24	210.26
1027	73358TKX8	DLA Buy	01/05/05	95.566	99.875	500	4.51%	430.90	2.50%	238.92	-
	73358TKX8	Customer Buy	01/05/05		99.875	10	4.51%	430.90	2.50%	238.92	191.99
1028	73358TKX8	Customer Buy	01/05/05		99.875	15	4.51%	646.35	2.50%	358.37	287.98
1029	73358TKX8	Customer Buy	01/05/05		99.875	20	4.51%	861.80	2.50%	477.83	383.97
1030	73358TKX8	Customer Buy	01/05/05		99.875	35	4.51%	1,508.15	2.50%	836.20	671.95
1031	73358TKX8	Customer Buy	01/05/05		99.875	50	4.51%	2,154.50	2.50%	1,194.58	959.92
1032	73358TKX8	Customer Buy	01/05/05		99.875	80	4.51%	3,447.20	2.50%	1,911.32	1,535.88
1033	73358TKX8	DLA Buy	01/10/05	96.089	100.375	500	4.46%	857.20	2.50%	480.45	-
	73358TKX8	Customer Buy	01/10/05		99.875	20	4.46%	857.20	2.50%	480.45	376.76
1034	73358TKX8	Customer Buy	01/10/05		99.875	90	3.94%	3,407.40	2.50%	2,162.00	1,245.40
1035	73358TKX8	Customer Buy	01/10/05		100.375	20	4.46%	857.20	2.50%	480.45	376.76
1036	73358TKX8	Customer Buy	01/10/05		100.375	30	4.46%	1,285.80	2.50%	720.67	565.13

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1037	73358TKX8	Customer Buy	01/10/05		100.050	10	4.12%	396.10	2.50%	240.22	155.88
1038	73358TKX8	Customer Buy	01/10/05		100.375	10	4.46%	428.60	2.50%	240.22	188.38
1039	73358TKX8	Customer Buy	01/10/05		99.375	15	3.42%	492.90	2.50%	360.33	132.57
1040	73358TKX8	Customer Buy	01/11/05		100.375	15	4.46%	642.90	2.50%	360.33	282.57
1041	73358TKX8	Customer Buy	01/11/05		100.375	15	4.46%	642.90	2.50%	360.33	282.57
1042	73358TKX8	Customer Buy	01/11/05		100.375	10	4.46%	428.60	2.50%	240.22	188.38
1043	73358TKX8	Customer Buy	01/11/05		100.375	10	4.46%	428.60	2.50%	240.22	188.38
1044	73358TKX8	Customer Buy	01/11/05		100.000	45	4.07%	1,759.95	2.50%	1,081.00	678.95
1045	73358TKX8	Customer Buy	01/11/05		100.375	25	4.46%	1,071.50	2.50%	600.56	470.94
1046	73358TKX8	Customer Buy	01/11/05		100.375	15	4.46%	642.90	2.50%	360.33	282.57
1047	73358TLA7	DLA Buy	01/11/05	98.558		150					
1048	73358TLA7	Customer Buy	01/11/05		102.750	10	4.25%	419.20	2.50%	246.40	172.80
1049	73358TLA7	Customer Buy	01/11/05		102.750	10	4.25%	419.20	2.50%	246.40	172.80
1050	73358TLA7	Customer Buy	01/11/05		102.750	30	4.25%	1,257.60	2.50%	739.19	518.41
1051	73358TLA7	Customer Buy	01/12/05		102.750	25	4.25%	1,048.00	2.50%	615.99	432.01
1052	73358TLA7	Customer Buy	01/12/05		102.750	10	4.25%	419.20	2.50%	246.40	172.80
1053	73358TLA7	Customer Buy	01/12/05		102.750	15	4.25%	628.80	2.50%	369.59	259.21
1054	73358TLA7	DLA Buy	01/19/05	99.250		250					
1055	73358TLA7	Customer Buy	01/20/05		103.500	20	4.28%	850.00	2.50%	496.25	353.75
1056	73358TLA7	Customer Buy	01/20/05		103.500	50	4.28%	2,125.00	2.50%	1,240.63	884.38
1057	73358TLA7	Customer Buy	01/20/05		103.000	100	3.78%	3,750.00	2.50%	2,481.25	1,268.75
1058	73358TLA7	Customer Buy	01/20/05		103.500	25	4.28%	1,062.50	2.50%	620.31	442.19
1059	73358TLA7	Customer Buy	01/20/05		102.375	45	3.15%	1,406.25	2.50%	1,116.56	289.69
1060	73358TLC3	DLA Buy	01/24/05	99.325		225					
1061	73358TLC3	Customer Buy	01/25/05		103.625	10	4.33%	430.00	2.50%	248.31	181.69
1062	73358TLC3	Customer Buy	01/25/05		103.625	35	4.33%	1,505.00	2.50%	869.09	635.91
1063	73358TLC3	Customer Buy	01/25/05		103.625	35	4.33%	1,505.00	2.50%	869.09	635.91
1064	73358TLC3	Customer Buy	01/25/05		103.625	45	4.33%	1,935.00	2.50%	1,117.41	817.59
1065	73358TLC3	DLA Buy	01/26/05	99.243		250					
1066	73358TLC3	Customer Buy	01/27/05		103.600	155	4.39%	6,753.35	2.50%	3,845.67	2,907.68
1067	73358TLC3	Customer Buy	01/27/05		103.500	50	4.29%	2,128.50	2.50%	1,240.54	887.96
1068	73358TLC3	Customer Buy	01/27/05		103.500	10	4.29%	425.70	2.50%	248.11	177.59
1069	73358TMJ7	DLA Buy	12/05/05	98.500		250					
1070	73358TMJ7	Customer Buy	12/06/05		102.750	25	4.31%	1,062.50	2.50%	615.63	446.88
1071	73358TMJ7	Customer Buy	12/06/05		102.750	115	4.31%	4,887.50	2.50%	2,831.88	2,055.63
1072	73358TMJ7	Customer Buy	12/06/05		102.750	95	4.31%	4,037.50	2.50%	2,339.38	1,698.13

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1068	73358TMM07	Customer Buy	12/06/05		102.625	10	4.19%	412.50	2.50%	246.25	166.25
1069	73358TMM0	DLA Buy	05/09/05	98.750		335					
1070	73358TMM0	Customer Buy	05/10/05		102.000	10	3.29%	325.00	2.50%	246.88	78.13
1071	73358TMM0	Customer Buy	05/10/05		103.000	10	4.30%	425.00	2.50%	246.88	178.13
1072	73358TMM0	Customer Buy	05/10/05		103.000	10	4.30%	425.00	2.50%	246.88	178.13
1073	73358TMM0	Customer Buy	05/10/05		103.000	25	4.30%	1,062.50	2.50%	617.19	445.31
1074	73358TMM0	Customer Buy	05/10/05		103.000	30	4.30%	1,275.00	2.50%	740.63	534.38
1075	73358TMM0	Customer Buy	05/10/05		103.000	15	4.30%	637.50	2.50%	370.31	267.19
1076	73358TMM0	Customer Buy	05/10/05		103.000	20	4.30%	850.00	2.50%	493.75	356.25
1077	73358TMM0	Customer Buy	05/10/05		103.000	25	4.30%	1,062.50	2.50%	617.19	445.31
1078	73358TMM0	Customer Buy	05/10/05		103.000	55	4.30%	2,337.50	2.50%	1,357.81	979.69
1079	73358TMM0	Customer Buy	05/10/05		103.000	10	4.30%	425.00	2.50%	246.88	178.13
1080	73358TMM0	Customer Buy	05/10/05		102.000	10	3.29%	325.00	2.50%	246.88	78.13
1081	73358TMM0	Customer Buy	05/10/05		102.000	10	3.29%	325.00	2.50%	246.88	78.13
1082	73358TMM0	Customer Buy	05/10/05		103.000	10	4.30%	425.00	2.50%	246.88	178.13
1083	73358TMM0	Customer Buy	05/10/05		103.000	10	4.30%	425.00	2.50%	246.88	178.13
1084	73358TMM0	Customer Buy	05/10/05		103.000	15	4.30%	637.50	2.50%	370.31	267.19
1085	73358TMM0	Customer Buy	05/10/05		103.000	20	4.30%	850.00	2.50%	493.75	356.25
1086	73358TMM0	Customer Buy	05/10/05		103.000	10	4.30%	425.00	2.50%	246.88	178.13
1087	73358TMM0	Customer Buy	05/10/05		103.000	10	4.30%	425.00	2.50%	246.88	178.13
1088	73358TMM0	DLA Buy	12/06/05	97.250		250					
1089	73358TMM0	Customer Buy	12/06/05		101.500	15	4.37%	4,375.00	2.50%	2,502.76	1,872.24
1090	73358TMM0	Customer Buy	12/06/05		101.650	40	4.52%	1,760.00	2.50%	972.50	787.50
1091	73358TMM0	Customer Buy	12/06/05		101.625	100	4.50%	562.50	2.50%	312.59	249.91
1092	73358TMM0	Customer Buy	12/07/05		100.625	20	3.47%	675.00	2.50%	486.25	188.75
1093	73358TMM0	DLA Buy	12/13/05	97.750		360					
1094	73358TMM0	Customer Buy	12/14/05		102.000	100	4.35%	4,250.00	2.50%	2,443.75	1,806.25
1095	73358TMM0	Customer Buy	12/14/05		102.250	20	4.60%	900.00	2.50%	488.75	411.25
1096	73358TMM0	Customer Buy	12/14/05		102.250	30	4.60%	1,350.00	2.50%	733.13	616.88
1097	73358TMM0	Customer Buy	12/14/05		102.250	45	4.60%	2,025.00	2.50%	1,099.69	925.31
1098	73358TMM0	Customer Buy	12/14/05		102.250	35	4.60%	1,575.00	2.50%	855.31	719.69
1099	73358TMM0	Customer Buy	12/14/05		102.250	30	4.60%	1,350.00	2.50%	733.13	616.88
1100	73358TMM0	Customer Buy	12/14/05		102.250	10	4.60%	450.00	2.50%	244.38	205.63

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1101	73358TMM0	DLA Buy	12/27/05	98.700	102.525	325	3.88%	1,530.00	2.50%	987.00	-
1102	73358TMM0	Customer Buy	12/27/05		102.525	200	3.88%	7,650.00	2.50%	4,935.00	543.00
1103	73358TMM0	Customer Buy	12/27/05		102.525	85	3.88%	3,251.25	2.50%	2,097.38	2,715.00
1104	73358TMN8	DLA Buy	04/20/05	98.375	102.500	250	4.19%	412.50	2.50%	245.94	1,153.88
1105	73358TMN8	Customer Buy	04/20/05		102.500	10	4.19%	2,681.25	2.50%	1,598.59	166.56
1106	73358TMN8	Customer Buy	04/21/05		102.500	65	4.19%	825.00	2.50%	491.88	1,082.66
1107	73358TMN8	DLA Buy	05/16/05	98.750	103.000	20	4.30%	637.50	2.50%	370.31	333.13
1108	73358TNP2	DLA Buy	06/14/05	97.375	101.625	500	4.36%	1,700.00	2.50%	973.75	267.19
1109	73358TNP2	Customer Buy	06/14/05		101.625	15	4.36%	637.50	2.50%	370.31	726.25
1110	73358TNP2	Customer Buy	06/14/05		101.625	40	4.36%	1,700.00	2.50%	973.75	272.34
1111	73358TNP2	Customer Buy	06/15/05		101.500	55	4.24%	2,268.75	2.50%	1,338.91	726.25
1112	73358TNP2	DLA Buy	06/20/05	97.125	101.000	250	4.22%	3,729.17	2.50%	2,431.77	929.84
1113	73358TNP2	DLA Buy	06/21/05	97.375	101.375	100	4.22%	410.42	2.50%	243.18	1,297.40
1114	73358TNP2	DLA Buy	06/21/05	97.375	101.375	250	4.22%	2,052.08	2.50%	1,215.89	167.24
1115	73358TNP2	Customer Buy	06/21/05		101.375	50	4.22%	1,641.67	2.50%	972.71	836.20
1116	73358TNP2	Customer Buy	06/21/05		101.375	40	4.22%	2,052.08	2.50%	1,215.89	836.20
1117	73358TNP2	Customer Buy	06/21/05		101.500	80	4.35%	3,383.33	2.50%	1,945.42	1,437.92
1118	73358TNP2	Customer Buy	06/22/05		101.625	50	4.48%	2,177.08	2.50%	1,215.89	961.20
1119	73358TNP2	Customer Buy	06/22/05		101.625	100	4.48%	4,354.17	2.50%	2,431.77	1,922.40
1120	73358TQM6	DLA Buy	09/14/05	97.875	102.250	500	4.47%	437.50	2.50%	244.69	-
1121	73358TQM6	DLA Buy	09/14/05	97.875	102.250	500	4.47%	7,656.25	2.50%	4,282.03	192.81
1122	73358TQM6	Customer Buy	09/14/05		102.250	175	4.47%	2,187.50	2.50%	1,223.44	3,374.22
1123	73358TQM6	Customer Buy	09/14/05		101.250	50	3.45%	337.50	2.50%	244.69	964.06
1124	73358TQM6	Customer Buy	09/15/05		101.250	10	3.45%	337.50	2.50%	244.69	92.81
1125	73358TQM6	Customer Buy	09/15/05		102.250	10	4.47%	437.50	2.50%	244.69	192.81
1126	73358TQM6	Customer Buy	09/15/05		102.000	20	4.21%	825.00	2.50%	489.38	335.63
1127	73358TQM6	Customer Buy	09/15/05		102.250	15	4.47%	656.25	2.50%	367.03	289.22

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
1128	73358TQM6	Customer Buy	09/15/05		102.250	25	4.47%	1,093.75	2.50%	611.72	482.03
1129	73358TQM6	Customer Buy	09/15/05		102.250	15	4.47%	656.25	2.50%	367.03	289.22
1130	73358TQM6	Customer Buy	09/15/05		102.250	15	4.47%	656.25	2.50%	367.03	289.22
1131	73358TQM6	Customer Buy	09/15/05		102.000	10	4.21%	412.50	2.50%	244.69	167.81
1132	73358TQM6	Customer Buy	09/15/05		102.250	10	4.47%	437.50	2.50%	244.69	192.81
1133	73358TQM6	Customer Buy	09/15/05		102.250	10	4.47%	437.50	2.50%	244.69	192.81
1134	73358TQM6	Customer Buy	09/15/05		102.250	20	4.47%	875.00	2.50%	489.38	385.63
1135	73358TQM6	Customer Buy	09/15/05		101.250	65	3.45%	2,193.75	2.50%	1,590.47	603.28
1136	73358TQM6	Customer Buy	09/15/05		102.000	20	4.21%	825.00	2.50%	489.38	335.63
1137	73358TQM6	Customer Buy	09/15/05		102.125	15	4.34%	637.50	2.50%	367.03	270.47
1138	73358TQM6	DLA Buy	12/06/05	95.269		75				-	-
1138	73358TQM6	Customer Buy	12/06/05		99.000	55	3.92%	2,052.05	2.50%	1,309.95	742.10
1139	73358TQM6	Customer Buy	12/06/05		99.000	10	3.92%	373.10	2.50%	238.17	134.93
1140	73358TQM6	Customer Buy	12/06/05		99.000	10	3.92%	373.10	2.50%	238.17	134.93
1141	73358TQM6	Customer Buy	12/07/05		99.000	30	3.92%	1,119.30	2.50%	714.52	404.78
1142	73358TQM6	Customer Buy	12/07/05		99.000	20	3.92%	746.20	2.50%	476.35	269.85
1143	73358TQM6	DLA Buy	12/08/05	95.270		50				-	-
1143	73358TQM6	Customer Buy	12/08/05		99.000	20	3.92%	746.00	2.50%	476.35	269.65
1144	73358TQM6	Customer Buy	12/08/05		99.000	30	3.92%	1,119.00	2.50%	714.52	404.48
1145	73358TQM6	DLA Buy	02/06/06	96.819		130				-	-
1145	73358TQM6	Customer Buy	02/06/06		101.000	70				-	-
1145	73358TQM6	Customer Buy	02/06/06		101.000	50	4.32%	2,090.50	2.50%	1,210.24	880.26
1146	73358TQM6	Customer Buy	02/06/06		101.000	50	4.32%	2,090.50	2.50%	1,210.24	880.26
1147	73358TQM6	Customer Buy	02/07/06		101.000	10	4.32%	418.10	2.50%	242.05	176.05
1148	73358TQM6	Customer Buy	02/07/06		100.000	60	3.29%	1,908.60	2.50%	1,452.29	456.31
1149	73358TQM6	Customer Buy	02/07/06		100.000	25	3.29%	795.25	2.50%	605.12	190.13
1150	73358TRU7	DLA Buy	01/11/06	96.695		250				-	-
1150	73358TRU7	DLA Buy	01/12/06	96.695		250				-	-
1150	73358TRU7	Customer Buy	01/12/06		100.875	10	4.32%	418.00	2.50%	241.74	176.26
1151	73358TRU7	Customer Buy	01/12/06		99.875	50	3.29%	1,590.00	2.50%	1,208.69	381.31
1152	73358TRU7	Customer Buy	01/12/06		100.875	105	4.32%	4,389.00	2.50%	2,538.24	1,850.76
1153	73358TRU7	Customer Buy	01/12/06		100.000	60	3.42%	1,983.00	2.50%	1,450.43	532.58
1154	73358TRU7	Customer Buy	01/12/06		100.000	25	3.42%	826.25	2.50%	604.34	221.91
1155	73358TRU7	Customer Buy	01/12/06		100.925	20	4.37%	846.00	2.50%	483.48	362.53
1156	73358TRU7	Customer Buy	01/12/06		100.000	15	3.42%	495.75	2.50%	362.61	133.14
1157	73358TRU7	Customer Buy	01/12/06		100.875	10	4.32%	418.00	2.50%	241.74	176.26
1158	73358TRU7	Customer Buy	01/12/06		100.875	10	4.32%	418.00	2.50%	241.74	176.26

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1159	73358TRU7	Customer Buy	01/12/06		99.875	10	3.29%	318.00	2.50%	241.74	76.26
1160	73358TVW8	DLA Buy	10/18/06	98.095		250					
1161	73358TVW8	Customer Buy	10/18/06		101.375	25	3.34%	820.00	2.50%	613.09	206.91
1162	73358TVW8	Customer Buy	10/18/06		102.375	10	4.36%	428.00	2.50%	245.24	182.76
1163	73358TVW8	Customer Buy	10/19/06		102.375	85	4.36%	3,638.00	2.50%	2,084.52	1,553.48
1164	73358TVW8	DLA Buy	01/17/07	98.750		250					
1165	73358TVW8	Customer Buy	01/17/07		103.000	100	4.30%	4,250.00	2.50%	2,468.75	1,781.25
1166	745190EF1	DLA Buy	09/12/05	103.886		500					
1167	745190EF1	Customer Buy	09/13/05		107.625	20	3.60%	747.80	2.50%	519.43	228.37
1168	745190EF1	Customer Buy	09/13/05		107.625	10	3.60%	373.90	2.50%	259.72	114.19
1169	745190EF1	Customer Buy	09/13/05		108.125	20	4.08%	847.80	2.50%	519.43	328.37
1170	745190EF1	Customer Buy	09/13/05		108.125	75	4.08%	3,179.25	2.50%	1,947.86	1,231.39
1171	745190EF1	Customer Buy	09/13/05		108.125	10	4.08%	423.90	2.50%	259.72	164.19
1172	745190EF1	Customer Buy	09/13/05		108.125	50	4.08%	2,119.50	2.50%	1,298.58	820.93
1173	745190EF1	Customer Buy	09/13/05		108.125	25	4.08%	1,059.75	2.50%	649.29	410.46
1174	745190EF1	Customer Buy	09/13/05		108.125	35	4.08%	1,483.65	2.50%	909.00	574.65
1175	745190EF1	Customer Buy	09/13/05		108.125	25	4.08%	1,059.75	2.50%	649.29	410.46
1176	745190EF1	Customer Buy	09/13/05		108.125	25	4.08%	1,059.75	2.50%	649.29	410.46
1177	745190KG2	DLA Buy	03/09/05	101.485		250					
1178	745190KG2	DLA Buy	03/21/05	101.140		500					
1179	745190KG2	Customer Buy	03/22/05		105.375	10	4.19%	423.50	3.00%	303.42	120.08
1180	745190KG2	Customer Buy	03/22/05		104.375	75	3.20%	2,426.25	3.00%	2,275.65	150.60
1181	745190KG2	Customer Buy	03/22/05		105.375	15	4.19%	635.25	3.00%	303.42	20.08
1182	745190KG2	Customer Buy	03/22/05		104.375	25	3.20%	808.75	3.00%	455.13	180.12
1183	745190KG2	Customer Buy	03/22/05		104.375	25	3.20%	808.75	3.00%	455.13	180.12
1184	745190KG2	Customer Buy	03/22/05		105.375	15	4.19%	635.25	3.00%	455.13	180.12
1185	745190KG2	Customer Buy	03/22/05		105.375	15	4.19%	635.25	3.00%	455.13	180.12
1186	745190KG2	Customer Buy	03/22/05		105.375	20	4.19%	847.00	3.00%	606.84	240.16
1187	745190KG2	Customer Buy	03/22/05		105.375	25	4.19%	1,058.75	3.00%	758.55	300.20
1188	745190KG2	Customer Buy	03/22/05		105.375	15	4.19%	635.25	3.00%	455.13	180.12

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1189	745190KG2	Customer Buy	03/22/05		105.375	60	4.19%	2,541.00	3.00%	1,820.52	720.48
1190	745190KG2	Customer Buy	03/22/05		105.375	110	4.19%	4,658.50	3.00%	3,337.62	1,320.88
1191	745190KG2	Customer Buy	03/22/05		105.375	10	4.19%	423.50	3.00%	303.42	120.08
1192	745190KG2	Customer Buy	03/22/05		105.375	30	4.19%	1,270.50	3.00%	910.26	360.24
1193	745190KG2	DLA Buy	04/08/05	100.999		360				-	-
	745190KG2	Customer Buy	04/08/05		105.125	25	4.09%	1,031.50	3.00%	757.49	274.01
1194	745190KG2	DLA Buy	05/04/05	102.891		340				-	-
	745190KG2	Customer Buy	05/05/05		107.000	25	3.99%	1,027.25	3.00%	771.68	255.57
1195	745190KG2	Customer Buy	05/05/05		107.000	50	3.99%	2,054.50	3.00%	1,543.37	511.13
1196	745190KG2	Customer Buy	05/05/05		107.000	10	3.99%	410.90	3.00%	308.67	102.23
1197	745190KG2	Customer Buy	12/06/05	98.160	102.375	30	4.29%	1,264.50	3.00%	883.44	381.06
1198	745190KG2	Customer Buy	12/06/05	98.160	102.375	25	4.29%	1,053.75	3.00%	736.20	317.55
1199	745190KG2	Customer Buy	12/06/05		102.425	25	4.34%	1,066.25	3.00%	736.20	330.05
1200	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1201	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1202	745190KG2	Customer Buy	12/06/05		102.375	25	4.29%	1,053.75	3.00%	736.20	317.55
1203	745190KG2	Customer Buy	12/06/05		102.375	15	4.29%	632.25	3.00%	441.72	190.53
1204	745190KG2	Customer Buy	12/06/05		102.375	20	4.29%	843.00	3.00%	588.96	254.04
1205	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1206	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1207	745190KG2	Customer Buy	12/06/05		102.375	25	4.29%	1,053.75	3.00%	736.20	317.55
1208	745190KG2	Customer Buy	12/06/05		102.000	10	3.91%	384.00	3.00%	294.48	89.52
1209	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1210	745190KG2	Customer Buy	12/06/05		102.375	20	4.29%	843.00	3.00%	588.96	254.04
1211	745190KG2	Customer Buy	12/06/05		102.375	50	4.29%	2,107.50	3.00%	1,472.40	635.10
1212	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1213	745190KG2	Customer Buy	12/06/05		102.375	15	4.29%	632.25	3.00%	441.72	190.53
1214	745190KG2	Customer Buy	12/06/05		102.375	20	4.29%	843.00	3.00%	588.96	254.04
1215	745190KG2	Customer Buy	12/06/05		102.375	20	4.29%	843.00	3.00%	588.96	254.04
1216	745190KG2	Customer Buy	12/06/05		102.375	50	4.29%	2,107.50	3.00%	1,472.40	635.10
1217	745190KG2	Customer Buy	12/06/05		102.375	70	4.29%	2,950.50	3.00%	2,061.36	889.14
1218	745190KG2	Customer Buy	12/06/05		102.375	100	4.29%	4,215.00	3.00%	2,944.80	1,270.20
1219	745190KG2	Customer Buy	12/06/05		102.375	35	4.29%	1,475.25	3.00%	1,030.68	444.57
1220	745190KG2	Customer Buy	12/06/05		102.375	15	4.29%	632.25	3.00%	441.72	190.53
1221	745190KG2	Customer Buy	12/06/05		102.375	25	4.29%	1,053.75	3.00%	736.20	317.55

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
1222	745190KG2	Customer Buy	12/06/05		102.375	20	4.29%	843.00	3.00%	588.96	254.04
1223	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1224	745190KG2	Customer Buy	12/06/05		102.375	25	4.29%	1,053.75	3.00%	736.20	317.55
1225	745190KG2	Customer Buy	12/06/05		102.375	10	4.29%	421.50	3.00%	294.48	127.02
1226	745190SL3	DLA Buy	06/13/05	103.846		600	4.00%	415.40	2.50%	259.62	155.79
1227	745190SL3	Customer Buy	06/14/05		108.000	10	4.00%	415.40	2.50%	259.62	155.79
1228	745190SL3	Customer Buy	06/14/05		108.000	50	4.00%	2,077.00	2.50%	1,298.08	778.92
1229	745190SL3	Customer Buy	06/14/05		107.000	10	3.04%	315.40	2.50%	259.62	55.78
1230	745190SL3	Customer Buy	06/14/05		108.000	10	4.00%	415.40	2.50%	259.62	155.79
1231	745190SL3	Customer Buy	06/14/05		108.000	50	4.00%	2,077.00	2.50%	1,298.08	778.92
1232	745190SL3	Customer Buy	06/14/05		108.000	15	4.00%	623.10	2.50%	389.42	233.68
1233	745190SL3	Customer Buy	06/14/05		108.000	50	4.00%	2,077.00	2.50%	1,298.08	778.92
1234	745190SL3	Customer Buy	06/14/05		108.000	10	4.00%	415.40	2.50%	259.62	155.79
1235	745190SL3	Customer Buy	06/14/05		108.000	45	4.00%	1,869.30	2.50%	1,168.27	701.03
1236	745190TP3	DLA Buy	09/26/05	103.776		500	4.07%	422.40	2.50%	259.44	162.96
1237	745190TP3	Customer Buy	09/27/05		108.000	10	4.07%	844.80	2.50%	518.88	325.92
1238	745190TP3	Customer Buy	09/27/05		108.000	10	4.07%	422.40	2.50%	259.44	162.96
1239	745190TP3	Customer Buy	09/27/05		108.000	25	4.07%	1,056.00	2.50%	648.60	407.40
1240	745190TP3	Customer Buy	09/27/05		108.000	25	4.07%	1,056.00	2.50%	648.60	407.40
1241	745190TP3	Customer Buy	09/27/05		108.000	10	4.07%	422.40	2.50%	259.44	162.96
1242	745190TU2	DLA Buy	11/29/05	98.538		300	3.26%	1,606.00	2.50%	1,231.73	374.28
1243	745190TU2	Customer Buy	11/30/05		101.750	50	4.27%	421.20	2.50%	246.35	174.86
1244	745190TU2	Customer Buy	11/30/05		102.750	10	4.27%	421.20	2.50%	246.35	174.86
1245	745190TU2	Customer Buy	11/30/05		102.750	25	4.27%	1,053.00	2.50%	615.86	437.14
1246	745190TU2	Customer Buy	11/30/05		102.750	15	4.27%	631.80	2.50%	369.52	262.28
1247	745190TU2	Customer Buy	11/30/05		102.750	25	4.27%	1,053.00	2.50%	615.86	437.14
1248	745190TU2	Customer Buy	11/30/05		102.750	20	4.27%	842.40	2.50%	492.69	349.71
1249	745190TU2	DLA Buy	01/17/06	100.750		500	4.22%	1,275.00	2.50%	755.63	519.38
1250	745190TU2	Customer Buy	01/18/06		105.000	30	4.32%	435.00	2.50%	251.88	183.12
1251	745190TU2	Customer Buy	01/18/06		105.000	10	4.22%	425.00	2.50%	251.88	173.13
1252	745190TU2	Customer Buy	01/18/06		105.000	50	4.22%	2,125.00	2.50%	1,259.36	865.63
1253	745190TU2	Customer Buy	01/18/06		105.000	20	4.22%	850.00	2.50%	503.75	346.25
1254	745190TU2	Customer Buy	01/18/06		105.000	100	4.22%	4,250.00	2.50%	2,518.75	1,731.25

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Expert's Max Markup in Dollars	Excess Markup in Dollars
1255	745190TU2	Customer Buy	01/18/06		105.000	10	4.22%	425.00	2.50%	251.88	173.13
1256	745190TU2	Customer Buy	01/18/06		105.000	10	4.22%	425.00	2.50%	251.88	173.13
1257	745190TU2	Customer Buy	01/18/06		105.000	25	4.22%	1,062.50	2.50%	629.69	432.81
1258	745190TU2	Customer Buy	01/18/06		105.000	100	4.22%	4,250.00	2.50%	2,518.75	1,731.25
1259	745190TU2	Customer Buy	01/18/06		105.000	50	4.22%	2,125.00	2.50%	1,259.38	865.63
1260	745190TU2	Customer Buy	01/18/06		105.125	10	4.34%	437.50	2.50%	251.88	185.63
1261	745190TU2	Customer Buy	01/18/06		105.000	20	4.22%	850.00	2.50%	503.75	346.25
1262	745190TU2	Customer Buy	01/18/06		105.000	10	4.22%	425.00	2.50%	251.88	173.13
1263	745220EL3	DLA Buy	12/06/06	36.963		110				-	-
1263	745220EL3	Customer Buy	12/07/06		39.100	25	5.78%	534.25	2.50%	231.02	303.23
1264	745220EL3	Customer Buy	12/07/06		39.100	25	5.78%	534.25	2.50%	231.02	303.23
1265	745220EL3	Customer Buy	12/07/06		39.100	25	5.78%	534.25	2.50%	231.02	303.23
1266	745220EL3	Customer Buy	12/07/06		39.100	25	5.78%	534.25	2.50%	231.02	303.23
1267	745220EZ2	DLA Buy	06/06/05	104.084		500				-	-
1267	745220EZ2	Customer Buy	06/07/05		108.250	10	4.00%	416.60	3.00%	312.25	104.35
1268	745220EZ2	Customer Buy	06/07/05		108.250	15	4.00%	624.90	3.00%	468.38	156.52
1269	745220EZ2	Customer Buy	06/07/05		108.250	20	4.00%	833.20	3.00%	624.50	208.70
1270	745220EZ2	Customer Buy	06/07/05		107.250	20	3.04%	633.20	3.00%	624.50	8.70
1271	745220EZ2	Customer Buy	06/07/05		108.250	135	4.00%	5,624.10	3.00%	4,215.40	1,408.70
1272	745220EZ2	Customer Buy	06/07/05		108.250	25	4.00%	1,041.50	3.00%	780.63	260.87
1273	745220EZ2	Customer Buy	06/07/05		108.250	10	4.00%	416.60	3.00%	312.25	104.35
1274	745220EZ2	Customer Buy	06/07/05		108.250	25	4.00%	1,041.50	3.00%	780.63	260.87
1275	745220EZ2	Customer Buy	06/07/05		108.000	10	3.76%	391.60	3.00%	312.25	79.35
1276	745220EZ2	Customer Buy	06/07/05		108.000	55	3.76%	2,153.80	3.00%	1,717.39	436.41
1277	745220EZ2	Customer Buy	06/07/05		108.250	20	4.00%	833.20	3.00%	624.50	208.70
1278	745220EZ2	Customer Buy	06/07/05		108.250	15	4.00%	624.90	3.00%	468.38	156.52
1279	745220EZ2	Customer Buy	06/07/05		108.250	20	4.00%	833.20	3.00%	624.50	208.70
1280	745220EZ2	Customer Buy	06/07/05		107.250	10	3.04%	316.60	3.00%	312.25	4.35
1281	745220EZ2	Customer Buy	06/07/05		108.250	10	4.00%	416.60	3.00%	312.25	104.35
1282	745220EZ2	DLA Buy	12/06/05	98.362		600				-	-
1282	745220EZ2	Customer Buy	12/06/05		102.600	15	4.31%	635.70	3.00%	442.63	193.07
1283	745220EZ2	Customer Buy	12/06/05		102.600	10	4.31%	423.80	3.00%	295.09	128.71
1284	745220EZ2	Customer Buy	12/06/05		102.600	100	4.31%	4,238.00	3.00%	2,950.86	1,287.14
1285	745220EZ2	Customer Buy	12/07/05		102.600	20	4.31%	847.60	3.00%	590.17	257.43
1286	745220EZ2	Customer Buy	12/07/05		102.600	10	4.31%	423.80	3.00%	295.09	128.71
1287	745220EZ2	Customer Buy	12/07/05		102.600	125	4.31%	5,297.50	3.00%	3,688.58	1,608.93
1288	745220EZ2	Customer Buy	12/07/05		102.600	25	4.31%	1,059.50	3.00%	737.72	321.79
1289	745220EZ2	Customer Buy	12/07/05		102.600	15	4.31%	635.70	3.00%	442.63	193.07

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)		Customer Price	Number of Bonds	Markup Percentage	Expert's Max Markup		Excess Markup In Dollars
									Markup In Dollars	Markup Percentage	
1290	745220EZZ	Customer Buy	12/07/05			102.600	20	4.31%	847.60	3.00%	590.17
1291	745220EZZ	Customer Buy	12/07/05			102.600	85	4.31%	3,602.30	3.00%	2,508.23
1292	745220EZZ	Customer Buy	12/07/05			102.600	10	4.31%	423.80	3.00%	295.09
1293	745220EZZ	Customer Buy	12/07/05			102.000	40	3.70%	1,455.20	3.00%	1,180.34
1294	745220EZZ	Customer Buy	12/07/05			102.600	10	4.31%	423.80	3.00%	295.09
1295	745220EZZ	Customer Buy	12/07/05			102.600	10	4.31%	423.80	3.00%	295.09
1296	745220EZZ	Customer Buy	12/07/05			102.600	10	4.31%	423.80	3.00%	295.09
1297	745220EZZ	Customer Buy	12/07/05			102.600	60	4.31%	2,542.80	3.00%	1,770.52
1298	745220EZZ	Customer Buy	12/07/05			102.500	15	4.21%	620.70	3.00%	442.63
1299	745220EZZ	Customer Buy	12/07/05			102.600	10	4.31%	423.80	3.00%	295.09
1300	745220EZZ	Customer Buy	12/07/05			102.600	10	4.31%	423.80	3.00%	295.09
1301	745220EZZ	DLA Buy	12/12/05	98.750		103.000	500				
1302	745220EZZ	Customer Buy	12/13/05			103.000	25	4.30%	1,062.50	3.00%	740.63
1303	745220EZZ	Customer Buy	12/13/05			103.000	35	4.30%	1,487.50	3.00%	1,036.88
1304	745220EZZ	Customer Buy	12/13/05			103.000	10	4.30%	425.00	3.00%	296.25
1305	745220EZZ	Customer Buy	12/13/05			103.000	30	4.30%	1,275.00	3.00%	888.75
1306	745220EZZ	Customer Buy	12/13/05			103.000	50	4.30%	2,125.00	3.00%	1,481.25
1307	745220EZZ	Customer Buy	12/13/05			103.000	20	4.30%	850.00	3.00%	592.50
1308	745220EZZ	Customer Buy	12/13/05			103.000	85	4.30%	3,612.50	3.00%	2,518.13
1309	745220EZZ	Customer Buy	12/13/05			103.000	15	4.30%	637.50	3.00%	444.38
1310	74526QEX6	DLA Buy	03/28/05	98.558		102.750	200				
1311	74526QEX6	Customer Buy	03/29/05			102.750	10	4.25%	419.20	2.00%	197.12
1312	74526QEX6	Customer Buy	03/29/05			102.750	20	4.25%	838.40	2.00%	394.23
1313	74526QEX6	Customer Buy	03/29/05			101.750	50	4.25%	2,096.00	2.00%	985.58
1314	74526QEX6	Customer Buy	03/29/05			102.750	100	3.24%	3,192.00	2.00%	1,971.16
1315	751396F49	DLA Buy	11/30/06	101.836		105.700	150				
1316	751396F49	Customer Buy	11/30/06			105.700	100	3.79%	3,864.00	2.50%	2,545.90
1317	759049HN2	DLA Buy	02/07/05	100.432		104.125	100				
1318	759049HN2	Customer Buy	02/08/05			104.125	50	3.68%	1,846.50	2.50%	1,255.40
1319	805805HM3	DLA Buy	07/05/05	98.300		102.500	250				
1320	805805HM3	Customer Buy	07/06/05			102.500	10	4.27%	420.00	2.50%	245.75
1320	805805HM3	Customer Buy	07/06/05			102.500	10	4.27%	420.00	2.50%	245.75

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1321	835308ES2	DLA Buy	02/27/06	98.875	103.000	250	4.17%	412.50	2.50%	247.19	165.31
1322	835308ES2	Customer Buy	02/28/06		103.000	25	4.17%	1,031.25	2.50%	617.97	413.28
1323	835308ES2	Customer Buy	02/28/06		103.000	10	4.17%	412.50	2.50%	247.19	165.31
1324	835308ES2	Customer Buy	02/28/06		103.000	70	4.17%	2,887.50	2.50%	1,730.31	1,157.19
1325	838536DK3	DLA Buy	01/09/06	98.950	103.125	250	4.22%	626.25	2.50%	371.06	255.19
1326	838536DK3	Customer Buy	01/10/06		103.125	15	4.22%	1,043.75	2.50%	618.44	425.31
1327	838536DK3	Customer Buy	01/10/06		103.125	15	4.22%	626.25	2.50%	371.06	255.19
1328	838536DK3	Customer Buy	01/10/06		103.125	30	4.22%	1,252.50	2.50%	742.13	510.37
1329	838536DK3	Customer Buy	01/10/06		103.125	15	4.22%	626.25	2.50%	371.06	255.19
1330	838536DK3	Customer Buy	01/10/06		103.000	10	4.09%	405.00	2.50%	247.38	157.63
1331	838536DK3	Customer Buy	01/10/06		103.125	15	4.22%	626.25	2.50%	371.06	255.19
1332	838536DK3	DLA Buy	02/06/06	98.875	103.000	150	4.17%	412.50	2.50%	247.19	165.31
1333	838536DK3	Customer Buy	02/07/06		102.875	15	4.05%	600.00	2.50%	370.78	229.22
1334	838536DK3	DLA Buy	03/20/06	99.000	103.250	150	4.29%	425.00	2.50%	247.50	177.50
1335	838536DK3	Customer Buy	03/21/06		103.250	10	4.29%	425.00	2.50%	247.50	177.50
1336	8526317D6	DLA Buy	02/06/06	100.059	104.125	100	4.06%	406.60	2.50%	250.15	156.45
1337	8526317D6	Customer Buy	02/07/06		104.000	90	3.94%	3,546.90	2.50%	2,251.33	1,295.57
1338	8526317D6	DLA Buy	02/27/06	100.750	105.000	100	4.22%	425.00	2.50%	251.88	173.13
1339	8526317D6	Customer Buy	02/28/06		105.000	10	4.22%	425.00	2.50%	251.88	173.13
1340	8526317D6	Customer Buy	02/28/06		105.125	55	4.34%	2,406.25	2.50%	1,386.31	1,020.94
1341	852660BM0	DLA Buy	10/16/06	99.300	103.500	100	4.23%	1,050.00	2.50%	620.63	429.38
1342	852660BM0	Customer Buy	10/17/06		103.500	25	4.23%	1,050.00	2.50%	620.63	429.38
1343	8647796X6	DLA Buy	12/27/05	99.935	103.875	500	3.94%	394.00	2.50%	249.84	144.16
1344	8647796X6	Customer Buy	12/28/05		103.875	10	3.94%	1,970.00	2.50%	1,249.19	720.81
1345	8647796X6	Customer Buy	12/28/05		103.875	50	3.94%	1,970.00	2.50%	1,249.19	720.81
1346	8647796X6	Customer Buy	12/28/05		103.875	185	3.94%	7,289.00	2.50%	4,621.99	2,667.01

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max			Excess Markup in Dollars
								Markup in Dollars	Markup Percentage	Markup in Dollars	
1347	8647796X6	Customer Buy	12/28/05		103.875	45	3.94%	1,773.00	2.50%	1,124.27	648.73
1348	8647796X6	Customer Buy	12/28/05		103.875	25	3.94%	985.00	2.50%	624.59	360.41
1349	8647796X6	Customer Buy	12/28/05		103.875	70	3.94%	2,758.00	2.50%	1,748.86	1,009.14
1350	8647796X6	Customer Buy	12/28/05		103.875	35	3.94%	1,379.00	2.50%	874.43	504.57
1351	8647796X6	Customer Buy	12/28/05		103.875	10	3.94%	394.00	2.50%	249.84	144.16
1352	8647796X6	Customer Buy	12/28/05		103.875	15	3.94%	591.00	2.50%	374.76	216.24
1353	8647797B3	DLA Buy	11/30/05	98.125		250				-	-
1354	8647797B3	Customer Buy	11/30/05		102.375	10	4.33%	425.00	2.50%	245.31	179.69
1355	8647797B3	Customer Buy	12/01/05		102.375	50	4.33%	2,125.00	2.50%	1,226.56	898.44
1356	8647797B3	Customer Buy	12/01/05		102.375	115	4.33%	4,887.50	2.50%	2,821.09	2,066.41
1357	8647797B3	Customer Buy	12/01/05		102.500	25	4.46%	1,093.75	2.50%	613.28	480.47
1358	880252BY6	DLA Buy	01/03/06	99.750		100				-	-
1359	880252BY6	DLA Buy	01/03/06	99.750		100				-	-
1360	880252BY6	Customer Buy	01/04/06		104.000	35	4.26%	1,487.50	2.50%	872.81	614.69
1361	880252BY6	Customer Buy	01/04/06		104.000	30	4.26%	1,275.00	2.50%	748.13	526.88
1362	880252BY6	Customer Buy	01/04/06		104.000	25	4.26%	1,062.50	2.50%	623.44	439.06
1363	880252BY6	Customer Buy	01/04/06		104.000	50	4.26%	2,125.00	2.50%	1,246.88	878.13
1364	880252BY6	Customer Buy	01/04/06		104.000	50	4.26%	2,125.00	2.50%	1,246.88	878.13
1365	888794AB0	DLA Buy	06/03/05	98.750		50				-	-
1366	888794AB0	Customer Buy	06/03/05		102.500	40	3.80%	1,500.00	3.00%	1,186.00	315.00
1367	888804AY7	DLA Buy	05/30/06	95.729		1000				-	-
1368	888804AY7	Customer Buy	05/31/06		100.000	10	4.46%	427.10	3.00%	287.19	139.91
1369	888804AY7	Customer Buy	05/31/06		100.000	20	4.46%	854.20	3.00%	574.37	279.83
1370	888804AY7	Customer Buy	05/31/06		100.000	45	4.46%	1,921.95	3.00%	1,292.34	629.61
1371	888804AY7	Customer Buy	05/31/06		100.000	10	4.46%	427.10	3.00%	287.19	139.91
1372	888804AY7	Customer Buy	05/31/06		100.000	50	4.46%	2,135.50	3.00%	1,435.94	699.57
1373	888804AY7	Customer Buy	05/31/06		100.000	100	4.46%	4,271.00	3.00%	2,871.87	1,399.13
1374	888804AY7	Customer Buy	05/31/06		100.000	40	4.46%	1,708.40	3.00%	1,148.75	559.65
1375	888804AY7	Customer Buy	05/31/06		100.000	10	4.46%	427.10	3.00%	287.19	139.91
1376	888804AY7	Customer Buy	05/31/06		100.000	30	4.46%	1,281.30	3.00%	861.56	419.74
1377	88880NAG4	DLA Buy	05/26/05	99.250		250				-	-
1378	88880NAG4	Customer Buy	05/26/05		103.625	20	4.41%	875.00	2.00%	397.00	478.00
1379	88880NAG4	Customer Buy	05/26/05		103.625	20	4.41%	875.00	2.00%	397.00	478.00
1380	88880NAG4	Customer Buy	05/26/05		102.250	100	3.02%	3,000.00	2.00%	1,985.00	1,015.00
1381	88880NAG4	Customer Buy	05/26/05		103.500	35	4.28%	1,487.50	2.00%	694.75	792.75
1382	88880NAG4	Customer Buy	05/27/05		103.125	50	3.90%	1,937.50	2.00%	992.50	945.00

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1377	8960298R9	DLA Buy	12/20/05	102.730	106.605	265	3.77%	1,550.00	2.00%	821.84	-
1378	8960298R9	Customer Buy	12/20/05		106.605	40	3.77%	387.50	2.00%	205.46	728.16
1379	8960298R9	Customer Buy	12/20/05		106.605	10	3.77%	1,937.50	2.00%	1,027.30	182.04
1380	8960298R9	Customer Buy	12/20/05		106.605	50	3.77%	2,518.75	2.00%	1,335.49	910.20
1381	8960298R9	Customer Buy	12/20/05		106.605	65	3.77%	1,937.50	2.00%	1,027.30	1,183.26
1382	8960298R9	Customer Buy	12/20/05		106.605	50	3.77%	1,937.50	2.00%	1,027.30	910.20
1383	8960298R9	DLA Buy	01/24/06	103.656		100					-
1384	8960298R9	Customer Buy	01/25/06		107.500	35	3.71%	1,345.40	2.00%	725.59	619.81
	8960298R9	Customer Buy	01/25/06		107.500	65	3.71%	2,498.60	2.00%	1,347.53	1,151.07
1385	8960298Y4	DLA Buy	05/16/05	101.767		140					-
1386	8960298Y4	Customer Buy	05/17/05		105.875	10	4.04%	410.80	2.50%	254.42	156.38
1387	8960298Y4	Customer Buy	05/17/05		105.875	40	4.04%	1,643.20	2.50%	1,017.67	625.53
	8960298Y4	Customer Buy	05/17/05		105.000	70	3.18%	2,263.10	2.50%	1,780.92	482.18
1388	8960298Z1	DLA Buy	01/10/05	102.271		250					-
1389	8960298Z1	Customer Buy	01/10/05		106.500	20	4.14%	845.80	2.50%	511.36	334.45
1390	8960298Z1	Customer Buy	01/10/05		106.500	30	4.14%	1,268.70	2.50%	767.03	501.67
1391	8960298Z1	Customer Buy	01/10/05		106.500	15	4.14%	634.35	2.50%	383.52	250.83
	8960298Z1	Customer Buy	01/10/05		106.500	25	4.14%	1,057.25	2.50%	639.19	418.06
1392	898116WY0	DLA Buy	09/19/05	97.444		250					-
1393	898116WY0	Customer Buy	09/20/05		101.625	25	4.29%	1,045.25	2.50%	609.03	436.23
	898116WY0	Customer Buy	09/20/05		101.625	25	4.29%	1,045.25	2.50%	609.03	436.23
1394	914447DM6	DLA Buy	04/18/05	103.331		100					-
1395	914447DM6	Customer Buy	04/19/05		107.000	10	3.55%	366.90	2.50%	256.33	108.57
1396	914447DM6	Customer Buy	04/19/05		107.375	15	3.91%	606.60	2.50%	387.49	219.11
	914447DM6	Customer Buy	04/19/05		107.375	75	3.91%	3,033.00	2.50%	1,937.46	1,095.54
1397	915799DW7	DLA Buy	02/22/05	98.125		150					-
1398	915799DW7	Customer Buy	02/23/05		102.250	10	4.20%	412.50	2.50%	245.31	167.19
1399	915799DW7	Customer Buy	02/23/05		102.375	20	4.33%	850.00	2.50%	490.63	359.38
1400	915799DW7	Customer Buy	02/23/05		102.250	10	4.20%	412.50	2.50%	245.31	167.19
1401	915799DW7	Customer Buy	02/23/05		102.250	30	4.20%	1,237.50	2.50%	735.94	501.56
	915799DW7	Customer Buy	02/23/05		102.375	35	4.33%	1,487.50	2.50%	858.59	628.91
1402	925053BT6	DLA Buy	04/24/06	96.200		345					-
	925053BT6	Customer Buy	04/24/06		100.500	50	4.47%	2,150.00	2.50%	1,202.50	947.50

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1403	9250538T6	Customer Buy	04/25/06		99.500	10	3.43%	330.00	2.50%	240.50	89.50
1404	9250538T6	Customer Buy	04/25/06		100.500	10	4.47%	430.00	2.50%	240.50	189.50
1405	9250538T6	Customer Buy	04/25/06		100.500	40	4.47%	1,720.00	2.50%	962.00	758.00
1406	9250538T6	Customer Buy	04/25/06		99.500	30	3.43%	990.00	2.50%	721.50	268.50
1407	9250538T6	Customer Buy	04/25/06		100.500	10	4.47%	430.00	2.50%	240.50	189.50
1408	9250538T6	Customer Buy	04/25/06		100.500	25	4.47%	1,075.00	2.50%	601.25	473.75
1409	9250538T6	Customer Buy	04/25/06		99.750	25	3.69%	887.50	2.50%	601.25	286.25
1410	9250538T6	Customer Buy	04/25/06		99.500	25	3.43%	825.00	2.50%	601.25	223.75
1411	9250538T6	Customer Buy	04/25/06		99.500	15	3.43%	495.00	2.50%	360.75	134.25
1412	9250538T6	Customer Buy	04/25/06		99.750	40	3.69%	1,420.00	2.50%	962.00	458.00
1413	9250538T6	Customer Buy	04/25/06		99.875	10	3.82%	367.50	2.50%	240.50	127.00
1414	953140J27	DLA Buy	12/19/05	99.625		150				-	-
1414	953140J27	Customer Buy	12/20/05		103.875	45	4.27%	1,912.50	3.00%	1,344.94	567.56
1415	953140J27	Customer Buy	12/20/05		103.875	20	4.27%	850.00	3.00%	597.75	252.25
1416	953140E55	DLA Buy	05/16/05	99.300		100				-	-
1416	953140E55	Customer Buy	05/17/05		103.375	10	4.10%	407.50	2.00%	198.60	208.90
1417	953140E55	Customer Buy	05/17/05		103.375	10	4.10%	407.50	2.00%	198.60	208.90
1418	953140E55	Customer Buy	05/17/05		103.375	15	4.10%	611.25	2.00%	297.90	313.35
1419	953140E63	DLA Buy	05/02/05	98.475		650				-	-
1420	953140E63	Customer Buy	05/03/05		102.500	10	4.09%	402.50	2.00%	196.95	205.55
1420	953140E63	Customer Buy	05/03/05		102.500	15	4.09%	603.75	2.00%	295.43	308.33
1421	953140E63	Customer Buy	05/03/05		102.500	50	4.09%	2,012.50	2.00%	984.75	1,027.75
1422	953140E63	Customer Buy	05/03/05		102.500	100	4.09%	4,025.00	2.00%	1,969.50	2,055.50
1423	953140E63	Customer Buy	05/03/05		102.500	50	4.09%	2,012.50	2.00%	984.75	1,027.75
1424	953140E63	Customer Buy	05/03/05		102.500	135	4.09%	5,433.75	2.00%	2,658.83	2,774.93
1425	953140E63	Customer Buy	05/03/05		102.500	135	4.09%	5,433.75	2.00%	2,658.83	2,774.93
1426	953140E97	DLA Buy	05/09/05	98.290		150				-	-
1426	953140E97	DLA Buy	05/09/05	98.325		150				-	-
1427	953140E97	Customer Buy	05/10/05		102.500	10	4.26%	419.25	2.50%	245.77	173.48
1428	953140E97	Customer Buy	05/10/05		102.500	10	4.26%	419.25	2.50%	245.77	173.48
1428	953140E97	Customer Buy	05/10/05		102.500	25	4.26%	1,048.13	2.50%	614.42	433.70
1429	953140E97	Customer Buy	05/10/05		102.500	50	4.26%	2,096.25	2.50%	1,228.84	867.41
1430	953140E97	Customer Buy	05/10/05		102.500	50	4.26%	2,096.25	2.50%	1,228.84	867.41
1431	957480AE6	DLA Buy	11/28/05	94.699		955				-	-
1431	957480AE6	Customer Buy	11/29/05		99.000	15	4.54%	645.15	3.00%	426.15	219.00
1432	957480AE6	Customer Buy	11/29/05		99.000	15	4.54%	645.15	3.00%	426.15	219.00

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	
1433	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1434	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1435	957480AE6	Customer Buy	11/29/05		99.000	15	4.54%	645.15	3.00%	426.15	219.00
1436	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1437	957480AE6	Customer Buy	11/29/05		99.000	10	4.54%	430.10	3.00%	284.10	146.00
1438	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1439	957480AE6	Customer Buy	11/29/05		99.000	10	4.54%	430.10	3.00%	284.10	146.00
1440	957480AE6	Customer Buy	11/29/05		99.000	10	4.54%	430.10	3.00%	284.10	146.00
1441	957480AE6	Customer Buy	11/29/05		99.000	40	4.54%	1,720.40	3.00%	1,136.39	584.01
1442	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1443	957480AE6	Customer Buy	11/29/05		99.000	40	4.54%	1,720.40	3.00%	1,136.39	584.01
1444	957480AE6	Customer Buy	11/29/05		99.000	45	4.54%	1,935.45	3.00%	1,278.44	657.01
1445	957480AE6	Customer Buy	11/29/05		99.000	50	4.54%	2,150.50	3.00%	1,420.49	730.02
1446	957480AE6	Customer Buy	11/29/05		99.000	25	4.54%	1,075.25	3.00%	710.24	365.01
1447	957480AE6	Customer Buy	11/29/05		99.000	10	4.54%	430.10	3.00%	284.10	146.00
1448	957480AE6	Customer Buy	11/29/05		99.000	10	4.54%	430.10	3.00%	284.10	146.00
1449	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1450	957480AE6	Customer Buy	11/29/05		99.000	25	4.54%	1,075.25	3.00%	710.24	365.01
1451	957480AE6	Customer Buy	11/29/05		99.000	60	4.54%	2,580.60	3.00%	1,704.58	876.02
1452	957480AE6	Customer Buy	11/29/05		99.200	10	4.75%	450.10	3.00%	284.10	166.00
1453	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1454	957480AE6	Customer Buy	11/29/05		99.000	15	4.54%	645.15	3.00%	426.15	219.00
1455	957480AE6	Customer Buy	11/29/05		99.000	70	4.54%	3,010.70	3.00%	1,988.68	1,022.02
1456	957480AE6	Customer Buy	11/29/05		99.000	15	4.54%	645.15	3.00%	426.15	219.00
1457	957480AE6	Customer Buy	11/29/05		98.750	50	4.28%	2,025.50	3.00%	1,420.49	605.02
1458	957480AE6	Customer Buy	11/29/05		99.000	10	4.54%	430.10	3.00%	284.10	146.00
1459	957480AE6	Customer Buy	11/29/05		99.000	35	4.54%	1,505.35	3.00%	994.34	511.01
1460	957480AE6	Customer Buy	11/29/05		97.750	60	3.22%	1,830.60	3.00%	1,704.58	126.02
1461	957480AE6	Customer Buy	11/29/05		99.000	20	4.54%	860.20	3.00%	568.19	292.01
1462	957480AE6	Customer Buy	11/29/05		99.000	10	4.54%	430.10	3.00%	284.10	146.00
1463	957480AE6	Customer Buy	11/29/05		98.750	45	4.28%	1,822.95	3.00%	1,278.44	544.51
1464	957480AE6	Customer Buy	11/29/05		98.750	30	4.28%	1,215.30	3.00%	852.29	363.01
1465	957480AE6	DLA Buy	12/06/05	94.063	98.375	1000	4.58%	4,312.00	3.00%	2,821.89	1,490.11
1466	957480AE6	Customer Buy	12/06/05		98.375	100	4.58%	4,312.00	3.00%	2,821.89	1,490.11
1467	957480AE6	Customer Buy	12/06/05		98.375	15	4.58%	646.80	3.00%	423.28	223.52
1468	957480AE6	Customer Buy	12/07/05		98.375	50	4.58%	2,156.00	3.00%	1,410.95	745.05
1469	957480AE6	Customer Buy	12/07/05		98.375	50	4.58%	2,156.00	3.00%	1,410.95	745.05
1470	957480AE6	Customer Buy	12/07/05		98.375	30	4.58%	1,293.60	3.00%	846.57	447.03
1471	957480AE6	Customer Buy	12/07/05		98.375	10	4.58%	431.20	3.00%	282.19	149.01

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max		Excess Markup in Dollars
								Markup Percentage	Markup in Dollars	
1472	957480AE6	Customer Buy	12/07/05		98.375	90	4.58%	3.00%	3,880.80	1,341.10
1473	957480AE6	Customer Buy	12/07/05		98.375	15	4.58%	3.00%	646.80	223.52
1474	957480AE6	Customer Buy	12/07/05		98.375	50	4.58%	3.00%	2,156.00	745.05
1475	957480AE6	Customer Buy	12/07/05		98.375	120	4.58%	3.00%	5,174.40	1,788.13
1476	957480AE6	Customer Buy	12/07/05		98.375	50	4.58%	3.00%	2,156.00	745.05
1477	957480AE6	Customer Buy	12/07/05		98.375	40	4.58%	3.00%	1,724.80	596.04
1478	957480AE6	Customer Buy	12/07/05		98.375	145	4.58%	3.00%	6,252.40	2,160.66
1479	957480AE6	Customer Buy	12/07/05		98.375	10	4.58%	3.00%	431.20	149.01
1480	957480AE6	Customer Buy	12/07/05		98.525	10	4.74%	3.00%	446.20	164.01
1481	957480AE6	Customer Buy	12/07/05		98.525	10	4.74%	3.00%	446.20	164.01
1482	957480AE6	Customer Buy	12/07/05		98.375	15	4.58%	3.00%	646.80	223.52
1483	957480AE6	DLA Buy	12/13/05	94.135		1000			636.00	-
1484	957480AE6	Customer Buy	12/14/05		98.375	15	4.50%	3.00%	636.00	212.39
1485	957480AE6	Customer Buy	12/14/05		98.500	10	4.64%	3.00%	436.50	154.09
1486	957480AE6	Customer Buy	12/14/05		98.500	50	4.64%	3.00%	2,182.50	770.47
1487	957480AE6	Customer Buy	12/14/05		98.500	50	4.64%	3.00%	2,182.50	770.47
1488	957480AF3	DLA Buy	11/14/05	93.369		1275			638.40	-
1489	957480AF3	Customer Buy	11/15/05		97.625	15	4.56%	3.00%	851.20	218.24
1490	957480AF3	Customer Buy	11/15/05		97.625	20	4.56%	3.00%	851.20	290.99
1491	957480AF3	Customer Buy	11/15/05		97.625	50	4.56%	3.00%	2,128.00	727.47
1491	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	3.00%	1,064.00	363.73
1492	957480AF3	Customer Buy	11/15/05		97.625	10	4.56%	3.00%	425.60	145.49
1493	957480AF3	Customer Buy	11/15/05		97.625	40	4.56%	3.00%	1,702.40	581.97
1494	957480AF3	Customer Buy	11/15/05		97.625	10	4.56%	3.00%	425.60	145.49
1495	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	3.00%	1,064.00	363.73
1496	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	3.00%	1,064.00	363.73
1497	957480AF3	Customer Buy	11/15/05		97.625	10	4.56%	3.00%	425.60	145.49
1498	957480AF3	Customer Buy	11/15/05		96.625	30	3.49%	3.00%	976.80	136.48
1499	957480AF3	Customer Buy	11/15/05		97.625	10	4.56%	3.00%	425.60	145.49
1500	957480AF3	Customer Buy	11/15/05		97.625	15	4.56%	3.00%	638.40	218.24
1501	957480AF3	Customer Buy	11/15/05		97.625	100	4.56%	3.00%	4,256.00	1,454.93
1502	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	3.00%	1,064.00	363.73
1503	957480AF3	Customer Buy	11/15/05		97.625	50	4.56%	3.00%	2,128.00	727.47
1504	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	3.00%	1,064.00	363.73
1505	957480AF3	Customer Buy	11/15/05		97.625	15	4.56%	3.00%	638.40	218.24
1506	957480AF3	Customer Buy	11/15/05		97.625	20	4.56%	3.00%	851.20	290.99
1507	957480AF3	Customer Buy	11/15/05		97.625	10	4.56%	3.00%	425.60	145.49
1508	957480AF3	Customer Buy	11/15/05		97.625	20	4.56%	3.00%	851.20	290.99

Transaction Number	Muni CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Number of Bonds	Markup Percentage	Expert's Max		
								Markup in Dollars	Markup Percentage	Expert's Max Markup in Dollars
1509	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	1,064.00	3.00%	700.27
1510	957480AF3	Customer Buy	11/15/05		97.625	35	4.56%	1,489.60	3.00%	980.37
1511	957480AF3	Customer Buy	11/15/05		97.625	20	4.56%	851.20	3.00%	560.21
1512	957480AF3	Customer Buy	11/15/05		97.875	20	4.83%	901.20	3.00%	560.21
1513	957480AF3	Customer Buy	11/15/05		97.625	15	4.56%	638.40	3.00%	420.16
1514	957480AF3	Customer Buy	11/15/05		97.625	100	4.56%	4,256.00	3.00%	2,801.07
1515	957480AF3	Customer Buy	11/15/05		97.625	35	4.56%	1,489.60	3.00%	980.37
1516	957480AF3	Customer Buy	11/15/05		97.625	15	4.56%	638.40	3.00%	420.16
1517	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	1,064.00	3.00%	700.27
1518	957480AF3	Customer Buy	11/15/05		97.625	15	4.56%	638.40	3.00%	420.16
1519	957480AF3	Customer Buy	11/15/05		97.625	15	4.56%	638.40	3.00%	420.16
1520	957480AF3	Customer Buy	11/15/05		97.725	25	4.67%	1,089.00	3.00%	700.27
1521	957480AF3	Customer Buy	11/15/05		97.625	60	4.56%	2,553.60	3.00%	1,680.64
1522	957480AF3	Customer Buy	11/15/05		97.625	25	4.56%	1,064.00	3.00%	700.27

Total Excess Markup in Dollars

\$ 765,345.28

Total Transactions

1,522

Department of Enforcement
v.
David Lerner Associates, Inc.
and William Mason

Disciplinary Proceeding No. 20050007427

Schedule B to Extended Hearing Panel Decision
CMO Customer Restitution Calculation

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
1	225458JY5	DLA Buy	02/24/05	97.250	101.500	2,593.500	4.37%	1,019.96	3.95%	0.42%	98.03
2	225458JY5	Customer Buy	02/25/05		101.500	25.000	4.37%	1,062.46	3.95%	0.42%	102.11
3	225458JY5	Customer Buy	02/25/05		101.500	10.000	4.37%	424.98	3.95%	0.42%	40.85
4	225458JY5	Customer Buy	02/25/05		101.500	10.000	4.37%	424.98	3.95%	0.42%	40.85
5	31395PV90	DLA Buy	04/06/05	96.250	100.625	2,250.000	4.55%	481.73	3.95%	0.60%	63.53
6	31395PV90	Customer Buy	04/06/05		100.625	13.000	4.55%	569.32	3.95%	0.60%	75.08
7	31395PV90	Customer Buy	04/06/05		100.625	25.000	4.55%	1,094.84	3.95%	0.60%	144.38
8	31395PV90	Customer Buy	04/07/05		100.625	40.000	4.55%	1,751.75	3.95%	0.60%	231.00
9	31395PV90	Customer Buy	04/07/05		100.625	10.000	4.55%	437.94	3.95%	0.60%	57.75
10	31395PV90	Customer Buy	04/07/05		100.625	200.000	4.55%	8,758.75	3.95%	0.60%	1,155.00
11	31395PV90	Customer Buy	04/07/05		100.625	100.000	4.55%	4,379.38	3.95%	0.60%	577.50
12	31395PV90	Customer Buy	04/07/05		100.625	100.000	4.55%	4,379.38	3.95%	0.60%	577.50
13	31395PV90	Customer Buy	04/07/05		100.625	20.000	4.55%	875.88	3.95%	0.60%	115.50
14	31395PV90	Customer Buy	04/07/05		100.625	100.000	4.55%	4,379.38	3.95%	0.60%	577.50
15	31395PV90	Customer Buy	04/07/05		100.625	30.000	4.55%	1,313.81	3.95%	0.60%	173.25
16	31395PV90	Customer Buy	04/07/05		100.625	12.000	4.55%	525.53	3.95%	0.60%	69.30
17	31395PV90	Customer Buy	04/07/05		100.625	21.000	4.55%	919.67	3.95%	0.60%	121.28
18	31395PV90	Customer Buy	04/07/05		100.625	100.000	4.55%	4,379.38	3.95%	0.60%	577.50
19	31395PV90	Customer Buy	04/07/05		100.625	16.000	4.55%	700.70	3.95%	0.60%	92.40
20	31395PV90	Customer Buy	04/07/05		100.625	18.000	4.55%	788.29	3.95%	0.60%	103.95
21	31395PV90	Customer Buy	04/07/05		100.625	50.000	4.55%	2,189.69	3.95%	0.60%	288.75
22	31395PV90	Customer Buy	04/07/05		100.625	24.000	4.55%	1,051.05	3.95%	0.60%	138.60
23	31395PV90	DLA Buy	04/07/05	96.000	100.625	1,000.000	4.82%	925.06	3.95%	0.87%	166.66
	31395PV90	Customer Buy	04/08/05		100.625	20.000	4.82%	925.06	3.95%	0.87%	166.66

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage		
24	31395PV90	Customer Buy	04/08/05		100.500	100,000	4.69%	4,500.48	3.95%	0.74%	708.48
25	31395PV90	Customer Buy	04/08/05		100.500	25,000	4.69%	1,125.12	3.95%	0.74%	177.12
26	31395PV90	Customer Buy	04/08/05		100.500	19,000	4.69%	855.09	3.95%	0.74%	134.61
27	31395PV90	Customer Buy	04/08/05		100.500	19,000	4.69%	855.09	3.95%	0.74%	134.61
28	31395PV90	Customer Buy	04/08/05		100.500	50,000	4.69%	2,250.24	3.95%	0.74%	354.24
29	31395PV90	Customer Buy	04/08/05		100.500	40,000	4.69%	1,800.19	3.95%	0.74%	283.39
30	31395PV90	Customer Buy	04/08/05		100.500	20,000	4.69%	900.10	3.95%	0.74%	141.70
31	31395PV90	Customer Buy	04/08/05		100.500	50,000	4.69%	2,250.24	3.95%	0.74%	354.24
32	31395PV90	Customer Buy	04/08/05		100.500	40,000	4.69%	1,800.19	3.95%	0.74%	283.39
33	31395PV90	Customer Buy	04/08/05		100.500	30,000	4.69%	1,350.14	3.95%	0.74%	212.54
34	31395PV90	Customer Buy	04/08/05		100.500	14,000	4.69%	630.07	3.95%	0.74%	99.19
35	31395PV90	Customer Buy	04/08/05		100.000	89,000	4.17%	3,560.28	3.95%	0.22%	185.40
36	31395PV90	Customer Buy	04/08/05		100.000	20,000	4.17%	800.06	3.95%	0.22%	41.66
37	31395PV90	Customer Buy	04/08/05		100.000	13,000	4.17%	520.04	3.95%	0.22%	27.08
38	31395PV90	DLA Buy	04/11/05	96.000		1,000,000					
39	31395PV90	Customer Buy	04/11/05		100.625	12,000	4.82%	555.26	3.95%	0.87%	100.22
40	31395PV90	Customer Buy	04/11/05		100.625	25,000	4.82%	1,156.80	3.95%	0.87%	208.80
41	31395PV90	Customer Buy	04/11/05		100.625	15,000	4.82%	694.08	3.95%	0.87%	125.28
42	31395PV90	Customer Buy	04/11/05		100.625	25,000	4.82%	1,156.80	3.95%	0.87%	208.80
43	31395PV90	Customer Buy	04/11/05		100.625	40,000	4.82%	1,850.88	3.95%	0.87%	334.08
44	31395PV90	Customer Buy	04/11/05		100.625	60,000	4.82%	2,776.32	3.95%	0.87%	501.12
45	31395PV90	Customer Buy	04/11/05		100.500	135,000	4.69%	6,078.24	3.95%	0.74%	959.04
46	31395PV90	Customer Buy	04/11/05		100.500	20,000	4.69%	900.48	3.95%	0.74%	142.08
47	31395PV90	Customer Buy	04/11/05		100.500	16,000	4.69%	720.38	3.95%	0.74%	113.66
48	31395PV90	Customer Buy	04/11/05		100.500	17,000	4.69%	765.41	3.95%	0.74%	120.77
49	31395PV90	Customer Buy	04/11/05		100.500	10,000	4.69%	450.24	3.95%	0.74%	71.04
50	31395PV90	Customer Buy	04/11/05		100.500	25,000	4.69%	1,125.60	3.95%	0.74%	177.60
51	31395PV90	Customer Buy	04/12/05		100.500	25,000	4.69%	1,125.60	3.95%	0.74%	177.60
52	31395PV90	Customer Buy	04/12/05		100.625	10,000	4.82%	462.72	3.95%	0.87%	83.52
53	31395PV90	Customer Buy	04/12/05		100.625	15,000	4.82%	694.08	3.95%	0.87%	125.28
54	31395PV90	Customer Buy	04/12/05		100.625	20,000	4.82%	925.44	3.95%	0.87%	167.04
55	31395PV90	Customer Buy	04/12/05		100.625	15,000	4.82%	694.08	3.95%	0.87%	125.28
56	31395PV90	Customer Buy	04/12/05		100.625	30,000	4.82%	1,388.16	3.95%	0.87%	250.56
57	31395PV90	Customer Buy	04/12/05		100.625	10,000	4.82%	462.72	3.95%	0.87%	83.52
58	31395PV90	Customer Buy	04/12/05		100.625	100,000	4.82%	4,627.20	3.95%	0.87%	835.20
59	31395PV90	Customer Buy	04/12/05		100.625	10,000	4.82%	462.72	3.95%	0.87%	83.52
60	31395PV90	Customer Buy	04/12/05		100.625	25,000	4.82%	1,156.80	3.95%	0.87%	208.80
61	31395PV90	Customer Buy	04/12/05		100.625	25,000	4.82%	1,156.80	3.95%	0.87%	208.80
62	31395PV90	Customer Buy	04/12/05		100.625	25,000	4.82%	1,156.80	3.95%	0.87%	208.80

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA		Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
				Price(s)					Markup in Dollars	Markup Percentage		
63	31395PV90	Customer Buy	04/12/05			100.625	10,000	4.82%	462.72	3.95%	0.87%	83.52
64	31395PV90	Customer Buy	04/12/05			100.625	60,000	4.82%	2,776.32	3.95%	0.87%	501.12
65	31395PV90	Customer Buy	04/12/05			100.625	9,000	4.82%	416.45	3.95%	0.87%	75.17
66	31395PV90	Customer Buy	04/12/05			100.625	9,000	4.82%	416.45	3.95%	0.87%	75.17
67	31395PV90	Customer Buy	04/12/05			100.500	25,000	4.69%	1,125.60	3.95%	0.74%	177.60
68	31395PV90	Customer Buy	04/12/05			100.500	10,000	4.69%	450.24	3.95%	0.74%	71.04
69	31395PV90	Customer Buy	04/12/05			100.500	19,000	4.69%	855.46	3.95%	0.74%	134.98
70	31395PV90	Customer Buy	04/12/05			100.500	11,000	4.69%	495.26	3.95%	0.74%	78.14
71	31395PV90	Customer Buy	04/12/05			100.500	20,000	4.69%	900.48	3.95%	0.74%	142.08
72	31395PV90	Customer Buy	04/12/05			100.500	10,000	4.69%	450.24	3.95%	0.74%	71.04
73	31395PV90	Customer Buy	04/12/05			100.500	10,000	4.69%	450.24	3.95%	0.74%	71.04
74	31395PV90	Customer Buy	04/12/05			100.500	18,000	4.69%	810.43	3.95%	0.74%	127.87
75	31395PV90	Customer Buy	04/12/05			100.500	12,000	4.69%	540.29	3.95%	0.74%	85.25
76	31395PV90	Customer Buy	04/12/05			100.000	10,000	4.17%	400.32	3.95%	0.22%	21.12
77	31395PV90	Customer Buy	04/12/05			100.000	10,000	4.17%	400.32	3.95%	0.22%	21.12
78	31395PV90	Customer Buy	04/12/05			100.000	25,000	4.17%	1,000.80	3.95%	0.22%	52.80
79	31395PV90	Customer Buy	04/12/05			100.000	10,000	4.17%	400.32	3.95%	0.22%	21.12
80	31395PV90	Customer Buy	04/12/05			100.000	25,000	4.17%	1,000.80	3.95%	0.22%	52.80
81	31395PV90	Customer Buy	04/12/05			100.000	14,000	4.17%	560.45	3.95%	0.22%	29.57
82	31395PV90	Customer Buy	04/12/05			100.000	10,000	4.17%	400.32	3.95%	0.22%	21.12
83	172973N96	DLA Buy	05/04/05	93.500		98.750	1,000,000	5.61%	524.54	3.75%	1.86%	173.91
84	172973N96	Customer Buy	05/04/05			98.750	10,000	5.61%	2,203.05	3.75%	1.86%	730.42
85	172973N96	Customer Buy	05/05/05			98.875	10,000	5.75%	537.63	3.75%	2.00%	187.00
86	172973N96	Customer Buy	05/05/05			98.750	10,000	5.61%	524.54	3.75%	1.86%	173.91
87	172973N96	Customer Buy	05/05/05			98.875	8,000	5.75%	430.10	3.75%	2.00%	149.60
88	172973N96	Customer Buy	05/05/05			98.875	10,000	5.75%	537.63	3.75%	2.00%	187.00
89	172973N96	Customer Buy	05/05/05			98.875	20,000	5.75%	1,075.25	3.75%	2.00%	374.00
90	172973N96	Customer Buy	05/05/05			98.875	8,000	5.75%	430.10	3.75%	2.00%	149.60
91	172973N96	Customer Buy	05/05/05			98.875	20,000	5.75%	1,075.25	3.75%	2.00%	374.00
92	172973N96	Customer Buy	05/05/05			98.875	30,000	5.75%	1,612.88	3.75%	2.00%	561.00
93	172973N96	DLA Buy	05/20/05	94.953		99.625	1,000,000	4.92%	747.47	3.75%	1.17%	177.75
94	172973N96	DLA Buy	05/23/05	95.375		100.000	1,000,000	4.85%	462.57	3.75%	1.10%	104.91
95	172973N96	Customer Buy	05/23/05			100.000	11,000	4.85%	508.83	3.75%	1.10%	115.40
96	172973N96	Customer Buy	05/23/05			100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
97	172973N96	Customer Buy	05/23/05			100.000	18,000	4.85%	832.62	3.75%	1.10%	188.84

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Percentage		
98	172973N96	Customer Buy	05/23/05		99.750	12,000	4.58%	524.18	3.75%	0.83%	94.99
99	172973N96	Customer Buy	05/23/05		100.000	16,000	4.85%	740.11	3.75%	1.10%	167.86
100	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
101	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
102	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
103	172973N96	Customer Buy	05/24/05		100.000	17,000	4.85%	786.37	3.75%	1.10%	178.35
104	172973N96	Customer Buy	05/24/05		100.000	13,000	4.85%	601.34	3.75%	1.10%	136.39
105	172973N96	Customer Buy	05/24/05		100.000	11,000	4.85%	508.83	3.75%	1.10%	115.40
106	172973N96	Customer Buy	05/24/05		100.000	50,000	4.85%	2,312.84	3.75%	1.10%	524.56
107	172973N96	Customer Buy	05/24/05		100.000	30,000	4.85%	1,387.71	3.75%	1.10%	314.74
108	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
109	172973N96	Customer Buy	05/24/05		100.000	20,000	4.85%	925.14	3.75%	1.10%	209.83
110	172973N96	Customer Buy	05/24/05		100.000	36,000	4.85%	1,665.25	3.75%	1.10%	377.69
111	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
112	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
113	172973N96	Customer Buy	05/24/05		99.875	45,000	4.72%	2,025.77	3.75%	0.97%	416.31
114	172973N96	Customer Buy	05/24/05		100.000	90,000	4.85%	4,163.12	3.75%	1.10%	944.21
115	172973N96	Customer Buy	05/24/05		100.000	60,000	4.85%	2,775.41	3.75%	1.10%	629.48
116	172973N96	Customer Buy	05/24/05		100.000	15,000	4.85%	693.85	3.75%	1.10%	157.37
117	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
118	172973N96	Customer Buy	05/24/05		100.000	35,000	4.85%	1,618.99	3.75%	1.10%	367.19
119	172973N96	Customer Buy	05/24/05		99.750	10,000	4.58%	436.82	3.75%	0.83%	79.16
120	172973N96	Customer Buy	05/24/05		100.000	13,000	4.85%	601.34	3.75%	1.10%	136.39
121	172973N96	Customer Buy	05/24/05		100.000	9,000	4.85%	416.31	3.75%	1.10%	94.42
122	172973N96	Customer Buy	05/24/05		100.000	15,000	4.85%	693.85	3.75%	1.10%	157.37
123	172973N96	Customer Buy	05/24/05		100.000	9,000	4.85%	416.31	3.75%	1.10%	94.42
124	172973N96	Customer Buy	05/24/05		100.000	9,000	4.85%	416.31	3.75%	1.10%	94.42
125	172973N96	Customer Buy	05/24/05		100.000	64,000	4.85%	2,960.44	3.75%	1.10%	671.44
126	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
127	172973N96	Customer Buy	05/24/05		100.000	31,000	4.85%	1,433.96	3.75%	1.10%	325.23
128	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
129	172973N96	Customer Buy	05/24/05		100.000	43,000	4.85%	1,989.05	3.75%	1.10%	451.12
130	172973N96	Customer Buy	05/24/05		100.000	23,000	4.85%	1,063.91	3.75%	1.10%	241.30
131	172973N96	Customer Buy	05/24/05		100.000	50,000	4.85%	2,312.84	3.75%	1.10%	524.56
132	172973N96	Customer Buy	05/24/05		100.000	12,000	4.85%	555.08	3.75%	1.10%	125.90
133	172973N96	Customer Buy	05/24/05		100.000	12,000	4.85%	555.08	3.75%	1.10%	125.90
134	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
135	172973N96	Customer Buy	05/24/05		100.000	10,000	4.85%	462.57	3.75%	1.10%	104.91
136	172973N96	Customer Buy	05/24/05		100.000	13,000	4.85%	601.34	3.75%	1.10%	136.39

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
137	172973N96	DLA Buy	05/31/05	96.406	101.000	986,000	4.77%	413.44	3.75%	1.02%		88.07
138	172973N96	Customer Buy	06/01/05		101.250	9,000	5.02%	532.78	3.75%	1.27%		135.10
139	172973N96	Customer Buy	06/01/05		101.000	11,000	4.77%	1,010.62	3.75%	1.02%		215.27
140	172973N96	Customer Buy	06/01/05		101.250	22,000	5.02%	9,686.87	3.75%	1.27%		2,456.42
141	172973N96	Customer Buy	06/01/05		100.500	200,000	4.25%	982.42	3.75%	0.50%		114.76
142	172973N96	Customer Buy	06/01/05		101.000	24,000	4.77%	872.81	3.75%	1.02%		185.92
143	172973N96	Customer Buy	06/01/05		100.500	19,000	4.25%	614.01	3.75%	0.50%		71.73
144	172973N96	Customer Buy	06/01/05		101.000	15,000	4.77%	918.75	3.75%	1.02%		195.70
145	172973N96	Customer Buy	06/01/05		100.500	20,000	4.25%	736.81	3.75%	0.50%		86.07
146	172973N96	Customer Buy	06/01/05		100.500	18,000	4.25%	532.14	3.75%	0.50%		62.16
147	172973N96	Customer Buy	06/01/05		100.500	13,000	4.25%	532.14	3.75%	0.50%		62.16
148	172973N96	Customer Buy	06/01/05		100.500	13,000	4.25%	409.34	3.75%	0.50%		47.82
149	172973N96	Customer Buy	06/01/05		100.500	10,000	4.25%	777.75	3.75%	0.50%		90.85
150	172973N96	Customer Buy	06/01/05		100.500	19,000	4.25%	2,537.91	3.75%	0.50%		296.47
151	172973N96	Customer Buy	06/01/05		100.500	62,000	4.25%	409.34	3.75%	0.50%		47.82
152	172973N96	Customer Buy	06/01/05		100.500	10,000	4.25%	777.75	3.75%	0.50%		90.85
153	172973N96	Customer Buy	06/01/05		100.500	19,000	4.25%	409.34	3.75%	0.50%		47.82
154	172973N96	Customer Buy	06/01/05		100.500	10,000	4.25%	1,555.49	3.75%	0.50%		181.71
155	38374BND1	DLA Buy	06/01/05	93.750		200,000						
156	38374BND1	Customer Buy	06/01/05		98.125	11,000	4.67%	481.59	3.95%	0.72%		74.25
157	38374BND1	Customer Buy	06/02/05		98.175	24,000	4.72%	1,062.00	3.95%	0.77%		173.25
		Customer Buy	06/02/05		98.175	10,000	4.72%	442.50	3.95%	0.77%		72.19
158	172973N96	DLA Buy	06/10/05	96.500		440,000						
159	172973N96	Customer Buy	06/10/05		101.000	12,000	4.66%	539.98	3.75%	0.91%		105.73
160	172973N96	Customer Buy	06/10/05		101.000	23,000	4.66%	1,034.95	3.75%	0.91%		202.64
161	172973N96	Customer Buy	06/13/05		101.000	20,000	4.66%	899.96	3.75%	0.91%		176.21
		Customer Buy	06/13/05		101.000	20,000	4.66%	899.96	3.75%	0.91%		176.21
162	93934FBK7	DLA Buy	08/10/05	96.969		1,000,000						
163	93934FBK7	Customer Buy	08/10/05		101.500	43,000	4.64%	1,934.73	3.95%	0.69%		287.71
164	93934FBK7	Customer Buy	08/11/05		101.500	15,000	4.64%	674.90	3.95%	0.69%		100.36
165	93934FBK7	Customer Buy	08/11/05		101.500	30,000	4.64%	1,349.81	3.95%	0.69%		200.73
166	93934FBK7	Customer Buy	08/11/05		101.500	10,000	4.64%	449.94	3.95%	0.69%		66.91
167	93934FBK7	Customer Buy	08/11/05		101.500	10,000	4.64%	449.94	3.95%	0.69%		66.91
168	93934FBK7	Customer Buy	08/11/05		101.500	25,000	4.64%	1,124.84	3.95%	0.69%		167.27
		Customer Buy	08/11/05		101.500	35,000	4.64%	1,574.78	3.95%	0.69%		234.18

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup in Dollars		
169	31394FZ73	DLA Buy	09/19/05	94.875	99.500	200,000	4.87%	924.08	3.75%	1.12%	212.52	
170	31394FZ73	Customer Buy	09/20/05		99.500	20,000	4.87%	1,386.12	3.75%	1.12%	318.78	
171	31394FZ73	Customer Buy	09/20/05		99.500	30,000	4.87%	2,079.19	3.75%	1.12%	478.17	
172	31394FZ73	Customer Buy	09/20/05		99.500	45,000	4.87%	462.04	3.75%	1.12%	106.26	
173	31394FZ73	Customer Buy	09/20/05		99.500	10,000	4.87%	462.04	3.75%	1.12%	106.26	
174	31394FZ73	Customer Buy	09/20/05		99.500	10,000	4.87%	462.04	3.75%	1.12%	106.26	
175	31394FZ73	Customer Buy	09/20/05		99.500	100,000	4.87%	4,620.41	3.75%	1.12%	1,062.60	
176	31394FZ73	Customer Buy	09/20/05		99.500	20,000	4.87%	924.08	3.75%	1.12%	212.52	
177	31394FZ73	Customer Buy	09/20/05		99.500	10,000	4.87%	462.04	3.75%	1.12%	106.26	
178	31394FZ73	Customer Buy	09/20/05		99.500	10,000	4.87%	462.04	3.75%	1.12%	106.26	
179	31394FZ73	Customer Buy	09/20/05		99.500	15,000	4.87%	693.06	3.75%	1.12%	159.39	
180	31394FZ73	Customer Buy	09/20/05		99.500	10,000	4.87%	462.04	3.75%	1.12%	106.26	
181	31394FZ73	Customer Buy	09/20/05		99.500	13,000	4.87%	600.65	3.75%	1.12%	138.14	
182	31394FZ73	Customer Buy	09/20/05		99.500	75,000	4.87%	3,465.31	3.75%	1.12%	796.95	
183	31394FZ73	DLA Buy	09/21/05	95.250	99.500	150,000	4.46%	425.01	3.75%	0.71%	67.82	
184	31394FZ73	Customer Buy	09/21/05		99.750	10,000	4.72%	449.96	3.75%	0.97%	92.77	
185	31394FZ73	Customer Buy	09/21/05		99.500	10,000	4.46%	2,422.53	3.75%	0.71%	386.56	
186	31394FZ73	Customer Buy	09/21/05		99.500	57,000	4.46%	1,232.52	3.75%	0.71%	196.67	
187	31394FZ73	Customer Buy	09/22/05		99.750	29,000	4.72%	1,484.87	3.75%	0.97%	306.15	
188	31394FZ73	Customer Buy	09/22/05		99.750	9,000	4.72%	404.96	3.75%	0.97%	83.50	
189	31394FZ73	Customer Buy	09/22/05		99.750	10,000	4.72%	449.96	3.75%	0.97%	92.77	
190	93934FBK7	DLA Buy	09/21/05	97.250	101.750	2,115,000	4.63%	450.27	3.95%	0.68%	66.13	
191	93934FBK7	Customer Buy	09/22/05		101.750	10,000	4.63%	585.35	3.95%	0.68%	85.97	
192	93934FBK7	Customer Buy	09/22/05		101.750	13,000	4.63%	450.27	3.95%	0.68%	66.13	
193	93934FBK7	Customer Buy	09/22/05		101.750	10,000	4.63%	2,251.34	3.95%	0.68%	330.65	
194	93934FBK7	Customer Buy	09/22/05		101.750	50,000	4.63%	450.27	3.95%	0.68%	66.13	
195	93934FBK7	Customer Buy	09/22/05		101.750	10,000	4.63%	2,881.71	3.95%	0.68%	423.23	
196	93934FBK7	Customer Buy	09/22/05		101.750	64,000	4.63%	1,530.91	3.95%	0.68%	224.84	
197	93934FBK7	Customer Buy	09/22/05		101.750	34,000	4.63%	900.54	3.95%	0.68%	132.26	
198	93934FBK7	Customer Buy	09/22/05		101.750	20,000	4.63%	450.27	3.95%	0.68%	66.13	
199	31394FZ73	DLA Buy	09/27/05	94.250	99.250	250,000	5.31%	1,249.99	3.75%	1.56%	366.40	
200	31394FZ73	Customer Buy	09/27/05		99.250	25,000	5.31%	2,999.98	3.75%	1.56%	879.35	
201	31394FZ73	Customer Buy	09/27/05		99.000	60,000	5.03%	852.66	3.75%	1.28%	216.47	

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
202	31394FZ73	Customer Buy	09/27/05		99.250	9,000	5.31%	450.42	3.75%	1.56%		132.33
203	31394FZ73	Customer Buy	09/27/05		99.250	15,000	5.31%	750.70	3.75%	1.56%		220.55
204	31394FZ73	Customer Buy	09/27/05		99.000	25,000	5.03%	1,185.19	3.75%	1.28%		301.60
205	31394FZ73	Customer Buy	09/27/05		99.000	23,000	5.03%	1,090.38	3.75%	1.28%		277.47
206	31394FZ73	Customer Buy	09/28/05		99.000	16,000	5.03%	758.52	3.75%	1.28%		193.02
207	31394FZ73	Customer Buy	09/28/05		99.000	15,000	5.03%	711.12	3.75%	1.28%		180.96
208	31394FZ73	Customer Buy	09/28/05		99.000	10,000	5.03%	474.08	3.75%	1.28%		120.64
209	31394FZ73	DLA Buy	10/03/05	93.875		500,000						
	31394FZ73	Customer Buy	10/03/05		98.500	25,000	4.93%	1,157.01	3.75%	1.18%		276.93
210	31394FZ73	Customer Buy	10/04/05		98.500	27,000	4.93%	1,249.57	3.75%	1.18%		299.09
211	31394FZ73	Customer Buy	10/04/05		98.500	48,000	4.93%	2,221.46	3.75%	1.18%		531.71
212	31394FZ73	Customer Buy	10/04/05		98.500	15,000	4.93%	694.21	3.75%	1.18%		166.16
213	31394FZ73	Customer Buy	10/04/05		98.500	15,000	4.93%	694.21	3.75%	1.18%		166.16
214	31394FZ73	Customer Buy	10/04/05		98.500	10,000	4.93%	462.80	3.75%	1.18%		110.77
215	31394FZ73	DLA Buy	10/07/05	92.875		250,000						
	31394FZ73	Customer Buy	10/07/05		98.300	35,000	5.84%	1,898.69	3.75%	2.09%		679.71
216	31394FZ73	DLA Buy	10/11/05	93.375		750,000						
	31394FZ73	Customer Buy	10/11/05		98.375	15,000	5.35%	749.33	3.75%	1.60%		224.10
217	31394FZ73	Customer Buy	10/11/05		98.250	10,000	5.22%	487.42	3.75%	1.47%		137.26
218	31394FZ73	Customer Buy	10/11/05		98.375	10,000	5.36%	499.56	3.75%	1.60%		149.40
219	31394FZ73	Customer Buy	10/11/05		98.375	8,000	5.36%	399.65	3.75%	1.60%		119.52
220	31394FZ73	Customer Buy	10/11/05		98.375	15,000	5.36%	749.33	3.75%	1.60%		224.10
221	31394FZ73	Customer Buy	10/11/05		98.250	100,000	5.22%	4,874.18	3.75%	1.47%		1,372.61
222	31394FZ73	Customer Buy	10/11/05		98.250	25,000	5.22%	1,218.54	3.75%	1.47%		343.15
223	31394FZ73	Customer Buy	10/11/05		98.375	25,000	5.36%	1,248.89	3.75%	1.60%		373.50
224	31394FZ73	Customer Buy	10/11/05		98.375	25,000	5.36%	1,248.89	3.75%	1.60%		373.50
225	31394FZ73	Customer Buy	10/11/05		98.250	35,000	5.22%	1,705.96	3.75%	1.47%		480.41
226	31394FZ73	Customer Buy	10/11/05		98.375	12,000	5.36%	599.47	3.75%	1.60%		179.28
227	31394FZ73	Customer Buy	10/11/05		98.375	20,000	5.36%	999.11	3.75%	1.60%		298.80
228	31394FZ73	Customer Buy	10/11/05		98.375	25,000	5.36%	1,248.89	3.75%	1.60%		373.50
229	31394FZ73	Customer Buy	10/11/05		98.525	15,000	5.52%	772.44	3.75%	1.77%		247.21
230	31394FZ73	Customer Buy	10/11/05		98.375	10,000	5.35%	499.56	3.75%	1.60%		149.40
231	31394FZ73	Customer Buy	10/11/05		98.250	8,000	5.22%	389.93	3.75%	1.47%		109.81
232	31394FZ73	Customer Buy	10/11/05		98.250	14,000	5.22%	682.38	3.75%	1.47%		192.17
233	31394FZ73	Customer Buy	10/11/05		98.250	11,000	5.22%	536.16	3.75%	1.47%		150.99
234	31394FZ73	Customer Buy	10/11/05		98.375	10,000	5.35%	499.56	3.75%	1.60%		149.40
235	31394FZ73	Customer Buy	10/11/05		98.375	25,000	5.35%	1,248.89	3.75%	1.60%		373.50
236	31394FZ73	Customer Buy	10/11/05		98.375	40,000	5.35%	1,998.23	3.75%	1.60%		597.60

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	Percentage		
237	31394FZ73	Customer Buy	10/11/05		98.250	17,000	5.22%	828.61	3.75%		1.47%		233.34
238	31394FZ73	Customer Buy	10/11/05		98.375	25,000	5.35%	1,248.89	3.75%		1.60%		373.50
239	31394FZ73	Customer Buy	10/11/05		98.375	203,000	5.35%	10,140.99	3.75%		1.60%		3,032.82
240	31394FZ73	Customer Buy	10/12/05		98.375	10,000	5.35%	499.56	3.75%		1.60%		149.40
241	31394FZ73	Customer Buy	10/12/05		98.000	9,000	4.95%	415.99	3.75%		1.20%		100.85
242	31394FZ73	Customer Buy	10/12/05		98.375	8,000	5.35%	399.65	3.75%		1.60%		119.52
243	31394FZ73	Customer Buy	10/12/05		98.375	12,000	5.35%	599.47	3.75%		1.60%		179.28
244	31394FZ73	Customer Buy	10/12/05		98.000	32,000	4.95%	1,479.06	3.75%		1.20%		358.56
245	31394T3W3	DLA Buy	01/03/06	95.625		675,000							
245	31394T3W3	Customer Buy	01/04/06		100.500	10,000	5.10%	487.50	3.95%		1.15%		109.78
246	31394T3W3	Customer Buy	01/04/06		100.500	100,000	5.10%	4,875.00	3.95%		1.15%		1,097.78
247	05946X2U6	DLA Buy	01/05/06	96.125		720,000							
247	05946X2U6	Customer Buy	01/05/06		101.000	160,000	5.07%	7,800.00	3.00%		2.07%		3,185.97
248	05946X2U6	Customer Buy	01/05/06		101.000	50,000	5.07%	2,437.50	3.00%		2.07%		995.61
249	05946X2U6	Customer Buy	01/05/06		101.000	15,000	5.07%	731.25	3.00%		2.07%		298.68
250	05946X2U6	Customer Buy	01/06/06		101.000	35,000	5.07%	1,706.25	3.00%		2.07%		696.93
251	05946X2U6	Customer Buy	01/06/06		101.000	10,000	5.07%	487.50	3.00%		2.07%		199.12
252	05946X2U6	Customer Buy	01/06/06		101.000	25,000	5.07%	1,218.75	3.00%		2.07%		497.81
253	05946X2U6	Customer Buy	01/06/06		100.000	11,000	4.03%	426.25	3.00%		1.03%		109.04
254	05946X2U6	Customer Buy	01/06/06		101.000	10,000	5.07%	487.50	3.00%		2.07%		199.12
255	05946X2U6	Customer Buy	01/06/06		101.000	25,000	5.07%	1,218.75	3.00%		2.07%		497.81
256	05946X2U6	Customer Buy	01/06/06		101.000	50,000	5.07%	2,437.50	3.00%		2.07%		995.61
257	05946X2U6	Customer Buy	01/06/06		101.000	15,000	5.07%	731.25	3.00%		2.07%		298.68
258	12668AJL0	DLA Buy	01/10/06	93.375		500,000							
258	12668AJL0	Customer Buy	01/10/06		98.125	33,000	5.09%	1,567.50	3.95%		1.14%		350.35
259	12668AJL0	Customer Buy	01/10/06		98.125	19,000	5.09%	902.50	3.95%		1.14%		201.72
260	12668AJL0	Customer Buy	01/10/06		98.125	29,000	5.09%	1,377.50	3.95%		1.14%		307.89
261	12668AJL0	Customer Buy	01/11/06		98.125	13,000	5.09%	617.50	3.95%		1.14%		138.02
262	12668AJL0	Customer Buy	01/11/06		98.125	10,000	5.09%	475.00	3.95%		1.14%		106.17
263	12668AJL0	Customer Buy	01/11/06		98.125	21,000	5.09%	997.50	3.95%		1.14%		222.95
264	12668AJL0	Customer Buy	01/11/06		98.125	13,000	5.09%	617.50	3.95%		1.14%		138.02
265	12668AJL0	Customer Buy	01/11/06		98.125	11,000	5.09%	522.50	3.95%		1.14%		116.78
266	12668AJL0	Customer Buy	01/11/06		98.125	10,000	5.09%	475.00	3.95%		1.14%		106.17
267	12668AJL0	Customer Buy	01/11/06		98.125	20,000	5.09%	950.00	3.95%		1.14%		212.33
268	12668AJL0	Customer Buy	01/11/06		98.125	11,000	5.09%	522.50	3.95%		1.14%		116.78
269	12668AJL0	DLA Buy	01/11/06	93.250		250,000							
269	12668AJL0	Customer Buy	01/12/06		98.125	80,000	5.23%	3,900.00	3.95%		1.28%		953.31

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Excess Markup Percentage			
270	12668AJL0	Customer Buy	01/12/06		98.125	9,000	5.23%	438.75	3.95%	1.28%			107.25
271	12668AJL0	Customer Buy	01/12/06		98.125	14,000	5.23%	682.50	3.95%	1.28%			166.83
272	12668AJL0	Customer Buy	01/12/06		99.000	18,000	5.09%	855.00	3.95%	1.14%			191.99
273	12668AJL0	Customer Buy	01/12/06		99.125	11,000	5.23%	536.25	3.95%	1.28%			131.08
274	12668AJL0	Customer Buy	01/12/06		97.125	62,000	4.16%	2,402.50	3.95%	0.21%			118.81
275	12668AJL0	DLA Buy	01/17/06	93.750		1,000,000							
276	12668AJL0	Customer Buy	01/18/06		98.625	41,000	5.20%	1,998.75	3.95%	1.25%			480.47
277	12668AJL0	Customer Buy	01/18/06		98.625	9,000	5.20%	438.75	3.95%	1.25%			105.47
278	12668AJL0	Customer Buy	01/18/06		98.625	10,000	5.20%	487.50	3.95%	1.25%			117.19
279	12668AJL0	Customer Buy	01/18/06		98.625	9,000	5.20%	438.75	3.95%	1.25%			105.47
280	12668AJL0	Customer Buy	01/18/06		98.625	10,000	5.20%	487.50	3.95%	1.25%			117.19
281	12668AJL0	Customer Buy	01/18/06		98.625	30,000	5.20%	1,462.50	3.95%	1.25%			351.56
282	12668AJL0	Customer Buy	01/18/06		98.625	17,000	5.20%	828.75	3.95%	1.25%			199.22
283	12668AJL0	Customer Buy	01/18/06		98.625	9,000	5.20%	438.75	3.95%	1.25%			105.47
284	12668AJL0	Customer Buy	01/18/06		98.625	20,000	5.20%	975.00	3.95%	1.25%			234.38
285	12668AJL0	Customer Buy	01/18/06		98.625	153,000	5.20%	7,458.75	3.95%	1.25%			1,792.97
286	12668AJL0	Customer Buy	01/18/06		98.625	81,000	5.20%	3,948.75	3.95%	1.25%			949.22
287	12668AJL0	Customer Buy	01/18/06		98.625	46,000	5.20%	2,242.50	3.95%	1.25%			539.06
288	12668AJL0	Customer Buy	01/18/06		98.625	22,000	5.20%	1,072.50	3.95%	1.25%			257.81
289	12668AJL0	Customer Buy	01/18/06		98.625	10,000	5.20%	487.50	3.95%	1.25%			117.19
290	12668AJL0	Customer Buy	01/18/06		98.625	9,000	5.20%	438.75	3.95%	1.25%			105.47
291	12668AJL0	Customer Buy	01/18/06		98.625	10,000	5.20%	487.50	3.95%	1.25%			117.19
292	12668AJL0	Customer Buy	01/18/06		98.625	35,000	5.20%	1,706.25	3.95%	1.25%			410.16
293	12668AJL0	Customer Buy	01/18/06		98.750	22,000	5.33%	1,100.00	3.95%	1.38%			285.31
294	12668AJL0	Customer Buy	01/18/06		98.750	10,000	5.33%	500.00	3.95%	1.38%			129.68
295	12668AJL0	Customer Buy	01/18/06		98.625	12,000	5.20%	585.00	3.95%	1.25%			140.63
296	12668AJL0	Customer Buy	01/18/06		98.750	20,000	5.33%	1,000.00	3.95%	1.38%			259.37
297	31395HYV6	DLA Buy	01/17/06	93.500		25,000							
	31395HYV6	Customer Buy	01/18/06		97.500	20,000	4.28%	800.00	3.95%	0.33%			61.35
298	225470VV2	DLA Buy	01/19/06	94.500		3,000,000							
	225470VV2	Customer Buy	01/19/06		99.500	75,000	5.29%	3,749.29	3.00%	2.29%			1,623.04
299	225470VV2	DLA Buy	01/20/06	94.500		1,000,000							
300	225470VV2	Customer Buy	01/20/06		99.500	45,000	5.29%	2,249.57	3.00%	2.29%			973.82
	225470VV2	Customer Buy	01/20/06		99.625	30,000	5.42%	1,536.57	3.00%	2.42%			686.07
301	225470VV2	Customer Buy	01/20/06		99.625	30,000	5.42%	1,536.57	3.00%	2.42%			686.07

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
302	225470VV2	DLA Buy	01/24/06	94.375	99.500	1,500,000	5.43%	768.68	3.00%	2.43%		341.72
303	225470VV2	Customer Buy	01/24/06		99.500	18,000	5.43%	922.42	3.00%	2.43%		410.06
304	225470VV2	Customer Buy	01/24/06		99.500	20,000	5.43%	1,024.91	3.00%	2.43%		455.63
305	225470VV2	Customer Buy	01/24/06		99.500	60,000	5.43%	3,074.74	3.00%	2.43%		1,366.88
306	225470VV2	Customer Buy	01/24/06		99.500	25,000	5.43%	1,281.14	3.00%	2.43%		569.53
307	225470VV2	Customer Buy	01/24/06		99.625	50,000	5.56%	2,625.04	3.00%	2.56%		1,201.41
308	225470VV2	Customer Buy	01/24/06		99.500	10,000	5.43%	512.46	3.00%	2.43%		227.81
309	225470VV2	Customer Buy	01/24/06		99.500	10,000	5.43%	512.46	3.00%	2.43%		227.81
310	225470VV2	Customer Buy	01/24/06		99.500	10,000	5.43%	512.46	3.00%	2.43%		227.81
311	225470VV2	Customer Buy	01/24/06		99.500	50,000	5.43%	2,562.28	3.00%	2.43%		1,139.06
312	225470VV2	Customer Buy	01/24/06		99.625	10,000	5.56%	525.01	3.00%	2.56%		240.28
313	225470VV2	Customer Buy	01/24/06		99.500	10,000	5.43%	512.46	3.00%	2.43%		227.81
314	225470VV2	Customer Buy	01/24/06		99.500	14,000	5.43%	717.44	3.00%	2.43%		318.94
315	225470VV2	Customer Buy	01/24/06		99.500	60,000	5.43%	3,074.74	3.00%	2.43%		1,366.88
316	225470VV2	Customer Buy	01/24/06		99.500	10,000	5.43%	512.46	3.00%	2.43%		227.81
317	225470VV2	Customer Buy	01/25/06		99.375	10,000	5.30%	500.00	3.00%	2.30%		215.44
318	225470VV2	Customer Buy	01/25/06		99.250	35,000	5.17%	1,706.39	3.00%	2.17%		710.72
319	225470VV2	Customer Buy	01/25/06		99.250	24,000	5.17%	1,170.10	3.00%	2.17%		487.35
320	225470VV2	Customer Buy	01/25/06		99.250	10,000	5.17%	487.54	3.00%	2.17%		203.06
321	93934FGQ9	DLA Buy	01/25/06	97.750	102.000	2,596,525	4.35%	850.00	3.95%	0.40%		77.81
322	93934FGQ9	Customer Buy	01/25/06		102.000	20,000	4.35%	1,360.00	3.95%	0.40%		124.49
323	93934FGQ9	Customer Buy	01/25/06		102.090	60,000	4.44%	2,604.00	3.95%	0.49%		287.39
324	93934FGQ9	Customer Buy	01/26/06		102.000	32,000	4.35%	1,360.00	3.95%	0.40%		124.49
325	93934FGQ9	Customer Buy	01/26/06		102.000	15,000	4.35%	637.50	3.95%	0.40%		58.36
326	31395UAZ4	DLA Buy	01/31/06	95.625	100.000	925,000	4.58%	1,080.19	3.95%	0.63%		179.35
326	31395UAZ4	Customer Buy	02/01/06		100.000	30,000	4.58%	1,080.19	3.95%	0.63%		179.35
327	126694XR4	DLA Buy	02/03/06	95.000	99.625	1,000,000	4.87%	4,625.00	3.95%	0.92%		872.48
327	126694XR4	Customer Buy	02/03/06		99.625	100,000	4.87%	4,625.00	3.95%	0.92%		872.48
328	576434Y65	DLA Buy	02/13/06	96.875	101.625	2,750,000	4.90%	1,186.72	3.95%	0.95%		230.08
328	576434Y65	Customer Buy	02/14/06		101.625	25,000	4.90%	1,186.72	3.95%	0.95%		230.08
329	576434Y65	Customer Buy	02/14/06		101.625	25,000	4.90%	1,186.72	3.95%	0.95%		230.08
330	576434Y65	Customer Buy	02/14/06		101.625	40,000	4.90%	1,898.75	3.95%	0.95%		368.13
331	576434Y65	Customer Buy	02/14/06		101.625	10,000	4.90%	474.69	3.95%	0.95%		92.03
332	576434Y65	Customer Buy	02/14/06		101.625	27,000	4.90%	1,281.66	3.95%	0.95%		248.48
333	576434Y65	Customer Buy	02/14/06		101.625	30,000	4.90%	1,424.06	3.95%	0.95%		276.09

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
334	576434Y65	Customer Buy	02/14/06		101.625	11,000	4.90%	522.16	3.95%	0.95%	101.23
335	576434Y65	Customer Buy	02/14/06		101.625	15,000	4.90%	712.03	3.95%	0.95%	138.05
336	576434Y65	Customer Buy	02/14/06		101.500	10,000	4.77%	462.09	3.95%	0.82%	79.44
337	576434Y65	Customer Buy	02/14/06		101.500	25,000	4.77%	1,155.23	3.95%	0.82%	198.59
338	576434Y65	Customer Buy	02/14/06		101.625	23,000	4.90%	1,091.78	3.95%	0.95%	211.67
339	31396HRY8	DLA Buy	02/14/06	93.000		20,000					
	31396HRY8	Customer Buy	02/14/06		99.250	10,000	6.72%	625.00	3.95%	2.77%	257.65
340	31396FRR6	DLA Buy	02/28/06	93.000		15,000					
	31396FRR6	Customer Buy	02/28/06		99.375	14,000	6.85%	892.50	3.95%	2.90%	378.20
341	05949TAE9	DLA Buy	03/01/06	95.063		1,465,000					
	05949TAE9	Customer Buy	03/01/06		99.500	10,000	4.67%	443.75	3.00%	1.67%	158.57
342	05949TAE9	Customer Buy	03/01/06		99.500	80,000	4.67%	3,550.00	3.00%	1.67%	1,268.52
343	05949TAE9	Customer Buy	03/01/06		99.500	30,000	4.67%	1,331.25	3.00%	1.67%	475.70
344	05949TAE9	Customer Buy	03/01/06		99.500	25,000	4.67%	1,109.38	3.00%	1.67%	396.41
345	05949TAE9	Customer Buy	03/01/06		99.500	14,000	4.67%	621.25	3.00%	1.67%	221.99
346	05949TAE9	Customer Buy	03/01/06		99.500	10,000	4.67%	443.75	3.00%	1.67%	158.57
347	05949TAE9	Customer Buy	03/01/06		99.500	70,000	4.67%	3,106.25	3.00%	1.67%	1,109.96
348	05949TAE9	Customer Buy	03/01/06		99.500	50,000	4.67%	2,218.75	3.00%	1.67%	792.83
349	05949TAE9	Customer Buy	03/01/06		99.500	10,000	4.67%	443.75	3.00%	1.67%	158.57
350	05949TAE9	Customer Buy	03/01/06		99.500	10,000	4.67%	443.75	3.00%	1.67%	158.57
351	05949TAE9	Customer Buy	03/01/06		99.500	15,000	4.67%	665.63	3.00%	1.67%	237.85
352	05949TAE9	Customer Buy	03/01/06		99.500	90,000	4.67%	3,993.75	3.00%	1.67%	1,427.09
353	05949TAE9	Customer Buy	03/01/06		99.500	10,000	4.67%	443.75	3.00%	1.67%	158.57
354	05949TAE9	Customer Buy	03/01/06		99.500	50,000	4.67%	2,218.75	3.00%	1.67%	792.83
355	05949TAE9	Customer Buy	03/01/06		99.500	45,000	4.67%	1,996.88	3.00%	1.67%	713.54
356	05949TAE9	Customer Buy	03/02/06		99.500	10,000	4.67%	443.75	3.00%	1.67%	158.57
357	05949TAE9	Customer Buy	03/02/06		99.375	10,000	4.54%	431.25	3.00%	1.54%	146.06
358	05949TAE9	Customer Buy	03/02/06		99.375	11,000	4.54%	474.38	3.00%	1.54%	160.67
359	05949TAE9	Customer Buy	03/02/06		99.500	32,000	4.67%	1,420.00	3.00%	1.67%	507.41
360	576434Y65	DLA Buy	03/02/06	96.750		3,000,000					
	576434Y65	Customer Buy	03/03/06		101.500	89,000	4.91%	4,227.88	3.95%	0.96%	826.63
361	576434Y65	Customer Buy	03/02/06		101.625	11,000	5.04%	536.25	3.95%	1.09%	115.88
362	31396JYL4	DLA Buy	03/14/06	93.625		75,000					
	31396JYL4	Customer Buy	03/15/06		98.500	75,000	5.21%	3,656.25	3.95%	1.26%	882.58

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
363	94982WAV6	DLA Buy	03/15/06	90.000	95.750	18,000	6.39%	1,035.00	3.00%	3.39%		549.00
364	94982WAV6	Customer Buy	03/15/06		95.250	25,000	5.83%	1,312.50	3.00%	2.83%		637.49
365	94982WAV6	Customer Buy	03/16/06		95.750	20,000	6.39%	1,150.00	3.00%	3.39%		610.00
366	94982WAV6	Customer Buy	03/16/06		95.875	50,000	6.53%	2,937.50	3.00%	3.53%		1,587.51
367	12668AGC3	DLA Buy	03/20/06	92.125		200,000						
367	12668AGC3	Customer Buy	03/21/06		98.000	20,000	6.38%	1,175.00	3.75%	2.63%		484.06
368	12668AGC3	Customer Buy	03/21/06		98.000	10,000	6.38%	587.50	3.75%	2.63%		242.03
369	126694Z92	DLA Buy	04/06/06	94.781		2,000,000						
370	126694Z92	Customer Buy	04/06/06		99.500	40,000	4.98%	1,888.04	3.95%	1.03%		390.50
371	126694Z92	Customer Buy	04/06/06		99.500	54,000	4.98%	2,548.85	3.95%	1.03%		527.17
372	126694Z92	Customer Buy	04/06/06		99.500	100,000	4.98%	4,720.09	3.95%	1.03%		976.24
373	126694Z92	Customer Buy	04/06/06		99.500	40,000	4.98%	1,888.04	3.95%	1.03%		390.50
374	126694Z92	Customer Buy	04/06/06		99.500	9,000	4.98%	424.81	3.95%	1.03%		87.86
375	126694Z92	Customer Buy	04/06/06		99.500	12,000	4.98%	566.41	3.95%	1.03%		117.15
376	126694Z92	Customer Buy	04/06/06		99.500	12,000	4.98%	566.41	3.95%	1.03%		117.15
377	126694Z92	Customer Buy	04/06/06		99.500	20,000	4.98%	944.02	3.95%	1.03%		195.25
378	126694Z92	Customer Buy	04/06/06		99.500	17,000	4.98%	802.42	3.95%	1.03%		165.96
379	126694Z92	Customer Buy	04/06/06		99.500	25,000	4.98%	1,180.02	3.95%	1.03%		244.06
380	126694Z92	Customer Buy	04/06/06		99.500	200,000	4.98%	9,440.19	3.95%	1.03%		1,952.49
381	126694Z92	Customer Buy	04/06/06		99.500	15,000	4.98%	708.01	3.95%	1.03%		146.44
382	126694Z92	Customer Buy	04/06/06		99.500	38,000	4.98%	1,793.64	3.95%	1.03%		370.97
383	126694Z92	Customer Buy	04/07/06		99.000	20,000	4.98%	944.02	3.95%	1.03%		195.25
384	126694Z92	Customer Buy	04/07/06		99.500	40,000	4.45%	1,687.10	3.95%	0.50%		189.56
385	126694Z92	Customer Buy	04/07/06		99.500	50,000	4.98%	2,360.05	3.95%	1.03%		488.12
386	126694Z92	Customer Buy	04/07/06		99.500	18,000	4.98%	849.62	3.95%	1.03%		175.72
387	126694Z92	Customer Buy	04/07/06		99.500	20,000	4.98%	944.02	3.95%	1.03%		195.25
388	126694Z92	Customer Buy	04/07/06		99.500	50,000	4.98%	2,360.05	3.95%	1.03%		488.12
389	126694Z92	Customer Buy	04/07/06		99.500	10,000	4.98%	472.01	3.95%	1.03%		97.62
390	126694Z92	Customer Buy	04/07/06		99.500	30,000	4.98%	1,416.03	3.95%	1.03%		292.87
391	126694Z92	Customer Buy	04/07/06		99.500	19,000	4.98%	896.82	3.95%	1.03%		185.49
392	126694Z92	Customer Buy	04/07/06		99.500	14,000	4.98%	660.81	3.95%	1.03%		136.67
393	126694Z92	Customer Buy	04/07/06		99.500	10,000	4.98%	472.01	3.95%	1.03%		97.62
394	126694Z92	Customer Buy	04/07/06		99.500	28,000	4.98%	1,321.63	3.95%	1.03%		273.35
395	126694Z92	Customer Buy	04/07/06		99.500	10,000	4.98%	472.01	3.95%	1.03%		97.62
396	126694Z92	Customer Buy	04/07/06		99.500	10,000	4.98%	472.01	3.95%	1.03%		97.62
397	126694Z92	Customer Buy	04/07/06		99.500	10,000	4.98%	472.01	3.95%	1.03%		97.62
398	126694Z92	Customer Buy	04/07/06		99.500	15,000	4.98%	708.01	3.95%	1.03%		146.44
	126694Z92	Customer Buy	04/07/06		99.500	11,000	4.98%	519.21	3.95%	1.03%		107.39

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
399	126694Z92	Customer Buy	04/07/06		99.600	45,000	5.08%	2,168.40	3.95%	1.13%	483.67
400	126694Z92	Customer Buy	04/07/06		99.500	10,000	4.98%	472.01	3.95%	1.03%	97.62
401	126694Z92	Customer Buy	04/07/06		99.500	20,000	4.98%	944.02	3.95%	1.03%	195.25
402	126694Z92	Customer Buy	04/07/06		99.500	23,000	4.98%	1,085.62	3.95%	1.03%	224.54
403	126694Z92	Customer Buy	04/07/06		99.500	25,000	4.98%	1,180.02	3.95%	1.03%	244.06
404	126694Z92	Customer Buy	04/07/06		99.500	40,000	4.98%	1,888.04	3.95%	1.03%	390.50
405	126694Z92	Customer Buy	04/07/06		99.500	40,000	4.98%	1,888.04	3.95%	1.03%	390.50
406	126694Z92	Customer Buy	04/07/06		99.500	10,000	4.98%	472.01	3.95%	1.03%	97.62
407	126694Z92	DLA Buy	04/11/06	94.500	99.000	2,250,000	4.76%	5,625.00	3.95%	0.81%	959.06
408	126694Z92	Customer Buy	04/11/06		99.375	125,000	5.16%	9,750.00	3.95%	1.21%	2,284.50
409	126694Z92	Customer Buy	04/11/06		99.375	200,000	5.16%	9,750.00	3.95%	1.21%	2,284.50
410	126694Z92	Customer Buy	04/11/06		99.375	25,000	5.16%	1,218.75	3.95%	1.21%	285.56
411	126694Z92	Customer Buy	04/11/06		99.375	40,000	5.16%	1,950.00	3.95%	1.21%	456.90
412	126694Z92	Customer Buy	04/11/06		99.375	100,000	5.16%	4,875.00	3.95%	1.21%	1,142.25
413	126694Z92	Customer Buy	04/11/06		99.375	10,000	5.16%	487.50	3.95%	1.21%	114.23
414	126694Z92	Customer Buy	04/11/06		99.375	20,000	5.16%	975.00	3.95%	1.21%	228.45
415	126694Z92	Customer Buy	04/11/06		99.375	30,000	5.16%	1,462.50	3.95%	1.21%	342.68
416	126694Z92	Customer Buy	04/11/06		99.375	50,000	5.16%	2,437.50	3.95%	1.21%	571.13
417	126694Z92	Customer Buy	04/11/06		99.375	15,000	5.16%	731.25	3.95%	1.21%	171.34
418	126694Z92	Customer Buy	04/11/06		99.375	40,000	5.16%	1,950.00	3.95%	1.21%	456.90
419	126694Z92	Customer Buy	04/11/06		99.375	25,000	5.16%	1,218.75	3.95%	1.21%	285.56
420	126694Z92	Customer Buy	04/11/06		99.375	50,000	5.16%	2,437.50	3.95%	1.21%	571.13
421	126694Z92	Customer Buy	04/11/06		99.375	30,000	5.16%	1,462.50	3.95%	1.21%	342.68
422	126694Z92	Customer Buy	04/11/06		99.375	40,000	5.16%	1,950.00	3.95%	1.21%	456.90
423	126694Z92	Customer Buy	04/11/06		99.375	12,000	5.16%	585.00	3.95%	1.21%	137.07
424	126694Z92	Customer Buy	04/11/06		99.375	36,000	5.16%	1,755.00	3.95%	1.21%	411.21
425	126694Z92	Customer Buy	04/11/06		99.375	30,000	5.16%	1,462.50	3.95%	1.21%	342.68
426	126694Z92	Customer Buy	04/11/06		99.375	10,000	5.16%	487.50	3.95%	1.21%	114.23
427	126694Z92	Customer Buy	04/11/06		99.375	20,000	5.16%	975.00	3.95%	1.21%	228.45
428	126694Z92	Customer Buy	04/11/06		99.375	10,000	5.16%	487.50	3.95%	1.21%	114.23
429	126694Z92	Customer Buy	04/11/06		99.375	20,000	5.16%	975.00	3.95%	1.21%	228.45
430	126694Z92	Customer Buy	04/11/06		99.375	50,000	5.16%	2,437.50	3.95%	1.21%	571.13
431	126694Z92	Customer Buy	04/11/06		99.375	10,000	5.16%	487.50	3.95%	1.21%	114.23
432	126694Z92	Customer Buy	04/11/06		99.375	10,000	5.16%	487.50	3.95%	1.21%	114.23
433	126694Z92	Customer Buy	04/11/06		99.375	15,000	5.16%	731.25	3.95%	1.21%	171.34
434	126694Z92	Customer Buy	04/11/06		99.375	50,000	5.16%	2,437.50	3.95%	1.21%	571.13
435	126694Z92	Customer Buy	04/11/06		99.375	30,000	5.16%	1,462.50	3.95%	1.21%	342.68
436	126694Z92	Customer Buy	04/11/06		99.375	50,000	5.16%	2,437.50	3.95%	1.21%	571.13
437	126694Z92	Customer Buy	04/11/06		99.375	45,000	5.16%	2,193.75	3.95%	1.21%	514.01

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
438	126694Z92	Customer Buy	04/11/06		99.375	19,000	5.16%	926.25	3.95%	1.21%	217.03
439	126694Z92	Customer Buy	04/11/06		99.375	40,000	5.16%	1,950.00	3.95%	1.21%	456.90
440	126694Z92	Customer Buy	04/11/06		99.375	25,000	5.16%	1,218.75	3.95%	1.21%	285.56
441	126694Z92	Customer Buy	04/12/06		99.250	10,000	5.03%	475.34	3.95%	1.08%	102.06
442	126694Z92	Customer Buy	04/12/06		99.250	50,000	5.03%	2,376.68	3.95%	1.08%	510.30
443	126694Z92	Customer Buy	04/12/06		99.250	12,000	5.03%	570.40	3.95%	1.08%	122.47
444	126694Z92	Customer Buy	04/12/06		99.250	40,000	5.03%	1,901.34	3.95%	1.08%	408.24
445	126694Z92	Customer Buy	04/12/06		99.370	25,000	5.15%	1,216.69	3.95%	1.20%	283.50
446	126694Z92	Customer Buy	04/12/06		99.371	20,000	5.15%	973.35	3.95%	1.20%	226.80
447	126694Z92	Customer Buy	04/12/06		99.375	15,000	5.16%	731.43	3.95%	1.21%	171.52
448	126694Z92	Customer Buy	04/12/06		99.375	25,000	5.16%	1,219.05	3.95%	1.21%	285.86
449	126694Z92	Customer Buy	04/12/06		99.375	100,000	5.16%	4,876.20	3.95%	1.21%	1,143.45
450	126694Z92	Customer Buy	04/12/06		98.375	50,000	4.10%	1,937.72	3.95%	0.15%	71.35
451	126694Z92	Customer Buy	04/12/06		99.375	9,000	5.16%	438.86	3.95%	1.21%	102.91
452	126694Z92	Customer Buy	04/12/06		99.375	50,000	5.16%	2,438.10	3.95%	1.21%	571.73
453	126694Z92	Customer Buy	04/12/06		99.375	100,000	5.16%	4,876.20	3.95%	1.21%	1,143.45
454	126694Z92	Customer Buy	04/12/06		99.375	20,000	5.16%	975.24	3.95%	1.21%	228.69
455	126694Z92	Customer Buy	04/12/06		99.375	10,000	5.16%	487.62	3.95%	1.21%	114.35
456	126694Z92	Customer Buy	04/12/06		99.375	35,000	5.16%	1,706.67	3.95%	1.21%	400.21
457	126694Z92	Customer Buy	04/12/06		99.375	10,000	5.16%	487.62	3.95%	1.21%	114.35
458	126694Z92	Customer Buy	04/12/06		99.375	10,000	5.16%	487.62	3.95%	1.21%	114.35
459	225470N41	DLA Buy	04/10/06	92.500		1,000,000	5.14%	2,375.00	3.00%	2.14%	987.48
460	225470N41	Customer Buy	04/11/06		97.250	50,000	5.14%	2,375.00	3.00%	2.14%	987.48
461	225470N41	Customer Buy	04/11/06		97.250	45,000	5.14%	2,137.50	3.00%	2.14%	888.74
462	225470N41	Customer Buy	04/11/06		97.250	50,000	5.14%	2,375.00	3.00%	2.14%	987.48
463	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
464	225470N41	Customer Buy	04/11/06		97.250	34,000	5.14%	1,615.00	3.00%	2.14%	671.49
465	225470N41	Customer Buy	04/11/06		97.250	95,000	5.14%	4,512.50	3.00%	2.14%	1,876.22
466	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
467	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
468	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
469	225470N41	Customer Buy	04/11/06		97.250	50,000	5.14%	2,375.00	3.00%	2.14%	987.48
470	225470N41	Customer Buy	04/11/06		97.250	25,000	5.14%	1,187.50	3.00%	2.14%	493.74
471	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
472	225470N41	Customer Buy	04/11/06		97.250	12,000	5.14%	570.00	3.00%	2.14%	237.00
473	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
474	225470N41	Customer Buy	04/11/06		97.250	14,000	5.14%	665.00	3.00%	2.14%	276.50
475	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
476	225470N41	Customer Buy	04/11/06		97.250	100,000	5.14%	4,750.00	3.00%	2.14%	1,974.97

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
477	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
478	225470N41	Customer Buy	04/11/06		97.250	25,000	5.14%	1,187.50	3.00%	2.14%	493.74
479	225470N41	Customer Buy	04/11/06		97.250	10,000	5.14%	475.00	3.00%	2.14%	197.50
480	225470N41	Customer Buy	04/11/06		97.375	15,000	5.27%	731.25	3.00%	2.27%	315.00
481	225470N41	Customer Buy	04/11/06		96.375	50,000	4.19%	1,937.50	3.00%	1.19%	550.01
482	225470N41	Customer Buy	04/11/06		96.375	30,000	4.19%	1,162.50	3.00%	1.19%	330.00
483	225470N41	Customer Buy	04/11/06		97.375	17,000	5.27%	828.75	3.00%	2.27%	357.00
484	225470N41	Customer Buy	04/11/06		97.375	31,000	5.27%	1,511.25	3.00%	2.27%	651.01
485	058931AM8	DLA Buy	04/13/06	94.063		2,949,000					
	058931AM8	Customer Buy	04/13/06		98.750	20,000	4.98%	937.50	3.00%	1.98%	373.13
486	058931AM8	Customer Buy	04/13/06		98.750	25,000	4.98%	1,171.88	3.00%	1.98%	466.41
487	058931AM8	Customer Buy	04/13/06		98.750	25,000	4.98%	1,171.88	3.00%	1.98%	466.41
488	058931AM8	Customer Buy	04/13/06		98.750	13,000	4.98%	609.38	3.00%	1.98%	242.53
489	058931AM8	Customer Buy	04/13/06		98.750	50,000	4.98%	2,343.75	3.00%	1.98%	932.82
490	058931AM8	Customer Buy	04/13/06		98.750	50,000	4.98%	2,343.75	3.00%	1.98%	932.82
491	058931AM8	Customer Buy	04/13/06		98.750	45,000	4.98%	2,109.38	3.00%	1.98%	839.54
492	058931AM8	Customer Buy	04/13/06		98.750	25,000	4.98%	1,171.88	3.00%	1.98%	466.41
493	31395LJG7	DLA Buy	04/17/06	91.500		144,000					
	31395LJG7	Customer Buy	04/18/06		96.750	12,000	5.74%	630.00	3.95%	1.79%	196.29
494	31395LJG7	Customer Buy	04/18/06		97.500	110,000	6.56%	6,600.00	3.95%	2.61%	2,624.35
495	225470VT7	DLA Buy	04/18/06	94.125		329,000					
	225470VT7	Customer Buy	04/19/06		98.625	20,000	4.78%	900.00	3.95%	0.83%	156.42
496	225470VT7	Customer Buy	04/19/06		98.625	9,000	4.78%	405.00	3.95%	0.83%	70.39
497	225470VT7	Customer Buy	04/19/06		98.625	10,000	4.78%	450.00	3.95%	0.83%	78.21
498	225470VT7	Customer Buy	04/19/06		98.625	25,000	4.78%	1,125.00	3.95%	0.83%	195.52
499	225470VT7	Customer Buy	04/19/06		98.500	24,000	4.65%	1,050.00	3.95%	0.70%	157.70
500	225470VT7	Customer Buy	04/19/06		98.625	10,000	4.78%	450.00	3.95%	0.83%	78.21
501	225470VT7	Customer Buy	04/19/06		98.625	20,000	4.78%	900.00	3.95%	0.83%	156.42
502	05949AEC0	DLA Buy	04/19/06	88.500		420,000					
	05949AEC0	Customer Buy	04/19/06		95.875	9,000	8.33%	663.75	3.00%	5.33%	424.80
503	05949AEC0	Customer Buy	04/19/06		95.875	11,000	8.33%	811.25	3.00%	5.33%	519.20
504	05949AEC0	Customer Buy	04/19/06		95.500	20,000	7.91%	1,400.00	3.00%	4.91%	869.00
505	05949AEC0	Customer Buy	04/19/06		95.500	12,000	7.91%	840.00	3.00%	4.91%	521.40
506	05949AEC0	Customer Buy	04/20/06		95.500	59,000	7.91%	4,130.00	3.00%	4.91%	2,563.55
507	05949AEC0	Customer Buy	04/20/06		95.500	11,000	7.91%	770.00	3.00%	4.91%	477.95
508	05949AEC0	Customer Buy	04/20/06		95.500	31,000	7.91%	2,170.00	3.00%	4.91%	1,346.95
509	05949AEC0	Customer Buy	04/20/06		95.500	25,000	7.91%	1,750.00	3.00%	4.91%	1,086.25

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO In Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup In Dollars
								Markup In Dollars	Markup Percentage			
510	05949AIECO	Customer Buy	04/20/06		95,500	20,000	7.91%	1,400.00	3.00%		4.91%	869.00
511	05949AIECO	Customer Buy	04/20/06		95,500	9,000	7.91%	630.00	3.00%		4.91%	391.05
512	05949AIECO	Customer Buy	04/20/06		95,500	40,000	7.91%	2,800.00	3.00%		4.91%	1,738.00
513	05949AIECO	Customer Buy	04/20/06		95,500	6,000	7.91%	420.00	3.00%		4.91%	260.70
514	126694Z92	DLA Buy	04/20/06	93.688		2,100,000						
514	126694Z92	Customer Buy	04/20/06		98,000	20,000	4.60%	861.93	3.95%		0.65%	121.79
515	126694Z92	Customer Buy	04/20/06		98,500	20,000	5.14%	963.11	3.95%		1.19%	222.98
516	126694Z92	Customer Buy	04/20/06		98,500	10,000	5.14%	481.56	3.95%		1.19%	111.49
517	126694Z92	Customer Buy	04/21/06		98,500	25,000	5.14%	1,203.89	3.95%		1.19%	278.72
518	126694Z92	Customer Buy	04/21/06		98,500	12,000	5.14%	577.87	3.95%		1.19%	133.79
519	126694Z92	Customer Buy	04/21/06		98,500	46,000	5.14%	2,215.16	3.95%		1.19%	512.85
520	126694Z92	Customer Buy	04/21/06		98,500	18,000	5.14%	866.80	3.95%		1.19%	200.68
521	126694Z92	Customer Buy	04/21/06		98,500	21,000	5.14%	1,011.27	3.95%		1.19%	234.13
522	126694Z92	Customer Buy	04/21/06		98,500	10,000	5.14%	481.56	3.95%		1.19%	111.49
523	126694Z92	Customer Buy	04/21/06		98,500	40,000	5.14%	1,926.23	3.95%		1.19%	445.95
524	126694Z92	Customer Buy	04/21/06		98,500	50,000	5.14%	2,407.78	3.95%		1.19%	557.44
525	126694Z92	Customer Buy	04/21/06		98,625	21,000	5.27%	1,036.85	3.95%		1.32%	259.70
526	126694Z92	Customer Buy	04/21/06		98,625	30,000	5.27%	1,481.21	3.95%		1.32%	371.00
527	126694Z92	Customer Buy	04/21/06		98,625	20,000	5.27%	987.47	3.95%		1.32%	247.34
528	126694Z92	Customer Buy	04/21/06		98,625	20,000	5.27%	987.47	3.95%		1.32%	247.34
529	126694Z92	Customer Buy	04/21/06		98,625	60,000	5.27%	2,962.41	3.95%		1.32%	742.01
530	225470N25	DLA Buy	04/21/06	94.250		3,400,000						
530	225470N25	Customer Buy	04/21/06		98,875	25,000	4.91%	1,156.25	3.95%		0.96%	225.54
531	31396HBEB	DLA Buy	04/24/06	95.625		150,000						
531	31396HBEB	Customer Buy	04/25/06		100,125	30,000	4.71%	1,350.00	3.95%		0.76%	216.85
532	31396HBG3	DLA Buy	04/24/06	95.000		150,000						
532	31396HBG3	Customer Buy	04/25/06		99,625	25,000	4.87%	1,156.25	3.95%		0.92%	218.12
533	31396HBG3	Customer Buy	04/25/06		99,625	10,000	4.87%	462.50	3.95%		0.92%	87.25
534	31396HBG3	Customer Buy	04/25/06		99,125	18,000	4.34%	742.50	3.95%		0.39%	67.05
535	225470N25	DLA Buy	05/02/06	93.531		1,336,000						
535	225470N25	Customer Buy	05/02/06		98,750	17,000	5.58%	887.19	3.95%		1.63%	259.13
536	225470N25	Customer Buy	05/02/06		98,750	30,000	5.58%	1,565.63	3.95%		1.63%	457.28
537	225470N25	Customer Buy	05/02/06		98,750	45,000	5.58%	2,348.44	3.95%		1.63%	685.92
538	225470N25	Customer Buy	05/02/06		98,750	13,000	5.58%	678.44	3.95%		1.63%	198.16
539	225470N25	Customer Buy	05/02/06		98,750	30,000	5.58%	1,565.63	3.95%		1.63%	457.28
540	225470N25	Customer Buy	05/02/06		98,875	150,000	5.71%	8,015.63	3.95%		1.76%	2,473.85

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max				Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage				
541	225470N25	Customer Buy	05/02/06		98.750	14,000	5.58%	730.63	3.95%		1.63%		213.40
542	225470N25	Customer Buy	05/02/06		98.750	12,000	5.58%	626.25	3.95%		1.63%		182.91
543	225470N25	Customer Buy	05/02/06		98.750	27,000	5.58%	1,409.06	3.95%		1.63%		411.55
544	225470N25	Customer Buy	05/02/06		98.750	15,000	5.58%	782.81	3.95%		1.63%		228.64
545	225470N25	Customer Buy	05/02/06		98.750	10,000	5.58%	521.88	3.95%		1.63%		152.43
546	225470N25	Customer Buy	05/02/06		98.750	8,000	5.58%	417.50	3.95%		1.63%		121.94
547	225470N25	Customer Buy	05/02/06		98.750	15,000	5.58%	782.81	3.95%		1.63%		228.64
548	225470N25	Customer Buy	05/02/06		98.750	76,000	5.58%	3,966.25	3.95%		1.63%		1,158.45
549	225470N25	Customer Buy	05/02/06		98.750	30,000	5.58%	1,565.63	3.95%		1.63%		457.28
550	225470N25	Customer Buy	05/02/06		98.750	50,000	5.58%	2,609.38	3.95%		1.63%		762.14
551	225470N25	Customer Buy	05/02/06		98.625	58,000	5.45%	2,954.38	3.95%		1.50%		811.55
552	225470N25	Customer Buy	05/03/06		98.000	50,000	4.78%	2,234.38	3.95%		0.83%		387.12
553	225470N25	Customer Buy	05/03/06		98.625	14,000	5.45%	713.13	3.95%		1.50%		195.89
554	225470N25	Customer Buy	05/03/06		98.625	8,000	5.45%	407.50	3.95%		1.50%		111.94
555	225470N25	Customer Buy	05/03/06		98.625	9,000	5.45%	458.44	3.95%		1.50%		125.93
556	225470N25	Customer Buy	05/03/06		98.625	10,000	5.45%	509.38	3.95%		1.50%		139.92
557	225470N25	Customer Buy	05/03/06		98.625	15,000	5.45%	764.06	3.95%		1.50%		209.88
558	225470N25	Customer Buy	05/03/06		98.625	17,000	5.45%	865.94	3.95%		1.50%		237.87
559	225470N25	Customer Buy	05/03/06		98.625	10,000	5.45%	509.38	3.95%		1.50%		139.92
560	225470N25	Customer Buy	05/03/06		98.625	10,000	5.45%	509.38	3.95%		1.50%		139.92
561	225470N25	Customer Buy	05/03/06		97.625	10,000	4.38%	409.38	3.95%		0.43%		39.93
562	225470N25	Customer Buy	05/03/06		98.625	10,000	5.45%	509.38	3.95%		1.50%		139.92
563	225470N25	Customer Buy	05/03/06		98.625	15,000	5.45%	764.06	3.95%		1.50%		209.88
564	225470N25	Customer Buy	05/03/06		98.625	25,000	5.45%	1,273.44	3.95%		1.50%		349.81
565	225470N25	Customer Buy	05/03/06		98.625	25,000	5.45%	1,273.44	3.95%		1.50%		349.81
566	225470N25	Customer Buy	05/03/06		98.625	30,000	5.45%	1,528.13	3.95%		1.50%		419.77
567	225470N25	Customer Buy	05/03/06		98.625	10,000	5.45%	509.38	3.95%		1.50%		139.92
568	225470N25	Customer Buy	05/03/06		98.625	15,000	5.45%	764.06	3.95%		1.50%		209.88
569	225470N25	Customer Buy	05/03/06		98.625	10,000	5.45%	509.38	3.95%		1.50%		139.92
570	225470N25	Customer Buy	05/03/06		98.625	25,000	5.45%	1,273.44	3.95%		1.50%		349.81
571	225470N25	Customer Buy	05/03/06		98.625	20,000	5.45%	1,018.75	3.95%		1.50%		279.84
572	225470N25	Customer Buy	05/03/06		98.625	20,000	5.45%	1,018.75	3.95%		1.50%		279.84
573	225470N25	Customer Buy	05/03/06		98.625	65,000	5.45%	3,310.94	3.95%		1.50%		909.50
574	225470N25	Customer Buy	05/03/06		98.625	28,000	5.45%	1,426.25	3.95%		1.50%		391.78
575	31396JUK9	DLA Buy	05/08/06	96.563		350,000							
575	31396JUK9	Customer Buy	05/09/06		100.625	15,000	4.21%	609.38	3.95%		0.26%		37.24
576	31396JUK9	Customer Buy	05/09/06		100.625	44,000	4.21%	1,787.50	3.95%		0.26%		109.24
577	31396JUK9	Customer Buy	05/09/06		100.625	10,000	4.21%	406.25	3.95%		0.26%		24.83
578	31396JUK9	Customer Buy	05/09/06		100.625	18,000	4.21%	731.25	3.95%		0.26%		44.69
579	31396JUK9	Customer Buy	05/09/06		100.625	30,000	4.21%	1,218.75	3.95%		0.26%		74.48

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup in Dollars		
580	31396JUK9	Customer Buy	05/09/06		100.625	30,000	4.21%	1,218.75	3.95%		0.26%	74.48
581	31396JUK9	Customer Buy	05/09/06		100.625	38,000	4.21%	1,543.75	3.95%		0.26%	94.34
582	31396JUK9	Customer Buy	05/09/06		100.625	20,000	4.21%	812.50	3.95%		0.26%	49.65
583	31396JUK9	Customer Buy	05/09/06		100.625	29,000	4.21%	1,178.13	3.95%		0.26%	72.00
584	31396JUK9	Customer Buy	05/09/06		100.625	10,000	4.21%	406.25	3.95%		0.26%	24.83
585	31396JUK9	Customer Buy	05/09/06		100.625	25,000	4.21%	1,015.63	3.95%		0.26%	62.07
586	362334CT9	DLA Buy	05/08/06	92.000		425,000						
586	362334CT9	Customer Buy	05/09/06		96.500	25,000	4.89%	1,125.00	3.00%		1.89%	435.00
587	362334CT9	Customer Buy	05/09/06		96.500	25,000	4.89%	1,125.00	3.00%		1.89%	435.00
588	362334CT9	Customer Buy	05/09/06		96.500	40,000	4.89%	1,800.00	3.00%		1.89%	696.00
589	362334CT9	Customer Buy	05/09/06		96.500	80,000	4.89%	3,600.00	3.00%		1.89%	1,392.00
590	362334CT9	Customer Buy	05/09/06		96.500	91,000	4.89%	4,095.00	3.00%		1.89%	1,583.40
591	362334CT9	Customer Buy	05/09/06		96.500	25,000	4.89%	1,125.00	3.00%		1.89%	435.00
592	362334CT9	Customer Buy	05/09/06		96.500	25,000	4.89%	1,125.00	3.00%		1.89%	435.00
593	362334CT9	Customer Buy	05/09/06		96.500	34,000	4.89%	1,530.00	3.00%		1.89%	591.60
594	362334CT9	Customer Buy	05/09/06		96.500	25,000	4.89%	1,125.00	3.00%		1.89%	435.00
595	362334CT9	Customer Buy	05/09/06		96.550	25,000	4.95%	1,137.50	3.00%		1.95%	447.51
596	31396J7B5	DLA Buy	05/09/06	92.000		2,085,739						
596	31396J7B5	Customer Buy	05/09/06		96.625	50,000	5.03%	2,312.50	3.95%		1.08%	495.51
597	31396J7B5	Customer Buy	05/09/06		96.625	1,670,000	5.03%	77,237.50	3.95%		1.08%	16,550.10
598	31396J7B5	Customer Buy	05/09/06		96.625	44,000	5.03%	2,035.00	3.95%		1.08%	436.05
599	31396J7B5	Customer Buy	05/09/06		96.625	15,000	5.03%	693.75	3.95%		1.08%	148.65
600	31396J7B5	Customer Buy	05/10/06		96.625	25,000	5.03%	1,156.25	3.95%		1.08%	247.76
601	31396J7B5	Customer Buy	05/10/06		96.625	20,000	5.03%	925.00	3.95%		1.08%	198.20
602	31396J7B5	Customer Buy	05/10/06		96.625	110,000	5.03%	5,087.50	3.95%		1.08%	1,090.13
603	31396J7B5	Customer Buy	05/10/06		96.625	47,000	5.03%	2,173.75	3.95%		1.08%	465.78
604	31396J7B5	Customer Buy	05/10/06		96.500	56,000	4.89%	2,520.00	3.95%		0.94%	484.96
605	021469AD3	DLA Buy	05/10/06	93.875		1,955,000						
605	021469AD3	Customer Buy	05/11/06		98.375	13,000	4.79%	585.00	3.95%		0.84%	102.95
606	021469AD3	Customer Buy	05/11/06		98.375	11,000	4.79%	495.00	3.95%		0.84%	87.11
607	021469AD3	Customer Buy	05/11/06		98.375	25,000	4.79%	1,125.00	3.95%		0.84%	197.98
608	021469AD3	Customer Buy	05/11/06		98.375	30,000	4.79%	1,350.00	3.95%		0.84%	237.58
609	021469AD3	Customer Buy	05/11/06		98.375	60,000	4.79%	2,700.00	3.95%		0.84%	475.16
610	021469AD3	Customer Buy	05/11/06		98.375	50,000	4.79%	2,250.00	3.95%		0.84%	395.96
611	021469AD3	Customer Buy	05/11/06		98.375	53,000	4.79%	2,385.00	3.95%		0.84%	419.72
612	021469AD3	Customer Buy	05/11/06		98.375	50,000	4.79%	2,250.00	3.95%		0.84%	395.96
613	021469AD3	Customer Buy	05/11/06		98.395	10,000	4.81%	452.00	3.95%		0.86%	81.19
614	021469AD3	Customer Buy	05/11/06		98.375	10,000	4.79%	450.00	3.95%		0.84%	79.19

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO In Dollars	Markup Percentage	Markup In Dollars	Expert's Max			Excess Markup Percentage	Excess Markup In Dollars
									Markup Percentage				
615	021469AD3	Customer Buy	05/11/06		98.375	28,000	4.79%	1,260.00	3.95%		0.84%		221.74
616	021469AD3	Customer Buy	05/11/06		98.375	25,000	4.79%	1,125.00	3.95%		0.84%		197.98
617	225470WA7	DLA Buy	05/10/06	94.063		627,000							
	225470WA7	Customer Buy	05/10/06		98.125	220,000	4.32%	8,937.50	3.00%		1.32%		2,729.31
618	225470WA7	Customer Buy	05/10/06		98.625	20,000	4.85%	912.50	3.00%		1.85%		348.13
619	225470WA7	Customer Buy	05/10/06		98.500	35,000	4.72%	1,553.13	3.00%		1.72%		565.47
620	225470WA7	Customer Buy	05/10/06		98.625	75,000	4.85%	3,421.88	3.00%		1.85%		1,305.48
621	225470WA7	Customer Buy	05/10/06		98.625	20,000	4.85%	912.50	3.00%		1.85%		348.13
622	225470WA7	Customer Buy	05/10/06		98.625	25,000	4.85%	1,140.63	3.00%		1.85%		435.16
623	225470WA7	Customer Buy	05/10/06		98.625	10,000	4.85%	456.25	3.00%		1.85%		174.06
624	225470WA7	Customer Buy	05/10/06		98.625	25,000	4.85%	1,140.63	3.00%		1.85%		435.16
625	225470WA7	Customer Buy	05/10/06		98.625	20,000	4.85%	912.50	3.00%		1.85%		348.13
626	225470WA7	Customer Buy	05/10/06		98.500	20,000	4.72%	887.50	3.00%		1.72%		323.13
627	225470WA7	Customer Buy	05/10/06		98.625	50,000	4.85%	2,281.25	3.00%		1.85%		870.32
628	225470WA7	Customer Buy	05/10/06		98.625	10,000	4.85%	456.25	3.00%		1.85%		174.06
629	225470WA7	Customer Buy	05/10/06		98.625	20,000	4.85%	912.50	3.00%		1.85%		348.13
630	225470WA7	Customer Buy	05/10/06		98.625	15,000	4.85%	684.38	3.00%		1.85%		261.10
631	225470WA7	Customer Buy	05/10/06		98.625	25,000	4.85%	1,140.63	3.00%		1.85%		435.16
632	61748HRT0	DLA Buy	05/10/06	83.625		220,000							
	61748HRT0	Customer Buy	05/10/06		98.500	27,000	5.21%	1,316.25	3.00%		2.21%		557.88
633	61748HRT0	Customer Buy	05/10/06		98.500	12,000	5.21%	585.00	3.00%		2.21%		247.95
634	61748HRT0	Customer Buy	05/10/06		98.500	15,000	5.21%	731.25	3.00%		2.21%		309.93
635	61748HRT0	Customer Buy	05/10/06		98.500	10,000	5.21%	487.50	3.00%		2.21%		206.62
636	61748HRT0	Customer Buy	05/10/06		98.375	56,000	5.07%	2,660.00	3.00%		2.07%		1,087.08
637	61748HRT0	Customer Buy	05/10/06		98.500	25,000	5.21%	1,218.75	3.00%		2.21%		516.55
638	61748HRT0	Customer Buy	05/10/06		98.500	10,000	5.21%	487.50	3.00%		2.21%		206.62
639	61748HRT0	Customer Buy	05/10/06		98.500	50,000	5.21%	2,437.50	3.00%		2.21%		1,033.11
640	05949CDC7	DLA Buy	05/10/06	89.500		250,000							
	05949CDC7	Customer Buy	05/11/06		94.375	38,000	5.45%	1,852.50	3.95%		1.50%		509.10
641	05949CDC7	Customer Buy	05/11/06		94.375	20,000	5.45%	975.00	3.95%		1.50%		267.95
642	05949CDC7	Customer Buy	05/11/06		94.375	20,000	5.45%	975.00	3.95%		1.50%		267.95
643	31396HBH1	DLA Buy	05/15/06	91.825		619,000							
	31396HBH1	Customer Buy	05/16/06		96.500	25,000	4.89%	1,125.00	3.95%		0.94%		216.09
644	31396HBH1	Customer Buy	05/16/06		96.500	29,000	4.89%	1,305.00	3.95%		0.94%		250.66
645	31396HBH1	Customer Buy	05/16/06		96.500	73,000	4.89%	3,285.00	3.95%		0.94%		630.97
646	31396HBH1	Customer Buy	05/16/06		96.500	40,000	4.89%	1,800.00	3.95%		0.94%		345.74
647	31396HBH1	Customer Buy	05/16/06		96.500	26,000	4.89%	1,170.00	3.95%		0.94%		224.73

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup in Dollars		
648	31396HBH1	Customer Buy	05/16/06	93.813	96.500	30,000	4.89%	1,350.00	3.95%		0.94%	259.30
649	31396HBH1	Customer Buy	05/16/06		96.550	100,000	4.95%	4,550.00	3.95%		1.00%	914.30
650	31396HBH1	Customer Buy	05/16/06		96.550	100,000	4.95%	4,550.00	3.95%		1.00%	914.30
651	31396HBF5	DLA Buy	05/18/06		98.500	804,000	5.00%	468.75	3.95%		1.05%	98.19
652	31396HBF5	Customer Buy	05/18/06		98.500	10,000	5.00%	468.75	3.95%		1.05%	98.19
653	31396HBF5	Customer Buy	05/18/06		98.500	55,000	5.00%	2,578.13	3.95%		1.05%	540.07
654	31396HBF5	Customer Buy	05/18/06		98.500	20,000	5.00%	937.50	3.95%		1.05%	196.39
655	31396HBF5	Customer Buy	05/18/06		98.500	10,000	5.00%	468.75	3.95%		1.05%	98.19
656	31396HBF5	Customer Buy	05/18/06		98.500	10,000	5.00%	468.75	3.95%		1.05%	98.19
657	31396HBF5	Customer Buy	05/18/06		98.500	20,000	5.00%	937.50	3.95%		1.05%	196.39
658	31396HBF5	Customer Buy	05/18/06		98.500	22,000	5.00%	1,031.25	3.95%		1.05%	216.03
659	31396HBF5	Customer Buy	05/18/06		98.500	12,000	5.00%	562.50	3.95%		1.05%	117.83
660	31396HBF5	Customer Buy	05/18/06		98.500	15,000	5.00%	703.13	3.95%		1.05%	147.29
661	31396HBF5	Customer Buy	05/18/06		98.500	12,000	5.00%	562.50	3.95%		1.05%	117.83
662	31396HBF5	Customer Buy	05/19/06		98.500	15,000	5.00%	703.13	3.95%		1.05%	147.29
663	31396HBF5	Customer Buy	05/19/06		98.500	30,000	5.00%	1,406.25	3.95%		1.05%	294.58
664	31396HBF5	Customer Buy	05/19/06		98.500	35,000	5.00%	1,640.63	3.95%		1.05%	343.68
665	31396HBF5	Customer Buy	05/19/06		98.500	16,000	5.00%	750.00	3.95%		1.05%	157.11
666	31396HBF5	Customer Buy	05/19/06		98.500	50,000	5.00%	2,343.75	3.95%		1.05%	490.97
667	31396HBF5	Customer Buy	05/19/06		98.500	50,000	5.00%	2,343.75	3.95%		1.05%	490.97
668	31396HBF5	Customer Buy	05/19/06		98.500	25,000	5.00%	1,171.88	3.95%		1.05%	245.49
669	31396HBF5	Customer Buy	05/19/06		98.500	30,000	5.00%	1,406.25	3.95%		1.05%	294.58
670	31396HBF5	Customer Buy	05/19/06		98.500	50,000	5.00%	2,343.75	3.95%		1.05%	490.97
671	31396HBF5	Customer Buy	05/19/06		98.500	25,000	5.00%	1,171.88	3.95%		1.05%	245.49
672	31396HBF5	Customer Buy	05/19/06		98.500	15,000	5.00%	703.13	3.95%		1.05%	147.29
673	31396HBF5	Customer Buy	05/19/06		98.500	14,000	5.00%	656.25	3.95%		1.05%	137.47
674	31396HBF5	Customer Buy	05/19/06		98.750	10,000	5.26%	468.75	3.95%		1.05%	98.19
675	31396HBF5	Customer Buy	05/19/06		98.500	18,000	5.26%	888.75	3.95%		1.31%	221.75
						125,000	5.00%	5,859.38	3.95%		1.05%	1,227.43
676	05949CDC7	DLA Buy	05/19/06	89.500		168,000						
677	05949CDC7	Customer Buy	05/19/06		94.375	20,000	5.45%	975.00	3.95%		1.50%	267.95
678	05949CDC7	Customer Buy	05/19/06		94.375	32,000	5.45%	1,560.00	3.95%		1.50%	428.71
679	05949CDC7	Customer Buy	05/19/06		94.375	25,000	5.45%	1,218.75	3.95%		1.50%	334.93
680	05949CDC7	Customer Buy	05/19/06		94.375	20,000	5.45%	975.00	3.95%		1.50%	267.95
681	05949CDC7	Customer Buy	05/19/06		94.375	12,000	5.45%	585.00	3.95%		1.50%	160.77
682	05949CDC7	Customer Buy	05/19/06		94.375	21,000	5.45%	1,023.75	3.95%		1.50%	281.34
						30,000	5.45%	1,462.50	3.95%		1.50%	401.92

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Excess Markup Percentage			
683	31396JUK9	DLA Buy	05/22/06	96.000	100.000	262.000	4.17%	720.00	3.95%	0.22%			37.45
684	31396JUK9	Customer Buy	05/22/06		100.500	18.000	4.69%	630.00	3.95%	0.74%			99.12
685	31396JUK9	Customer Buy	05/23/06		100.000	14.000	4.17%	920.00	3.95%	0.22%			47.85
686	31396JUK9	Customer Buy	05/23/06		100.500	23.000	4.69%	1,125.00	3.95%	0.74%			177.00
687	31396JUK9	Customer Buy	05/23/06		100.500	25.000	4.69%	2,250.00	3.95%	0.74%			354.00
688	31396JUK9	Customer Buy	05/23/06		100.500	50.000	4.69%	900.00	3.95%	0.74%			141.60
689	31396JUK9	Customer Buy	05/23/06		100.500	20.000	4.69%	675.00	3.95%	0.74%			106.20
690	31396JUK9	Customer Buy	05/23/06		100.500	15.000	4.69%	630.00	3.95%	0.74%			99.12
691	31396JUK9	Customer Buy	05/23/06		100.500	14.000	4.69%	675.00	3.95%	0.74%			106.20
692	31396JUK9	Customer Buy	05/23/06		100.500	15.000	4.69%	675.00	3.95%	0.74%			106.20
693	05949QAN5	DLA Buy	05/22/06	89.938	94.500	2,000.000	5.07%	684.38	3.75%	1.32%			178.48
694	05949QAN5	Customer Buy	05/23/06		94.500	15.000	5.07%	456.25	3.75%	1.32%			118.99
695	05949QAN5	Customer Buy	05/23/06		94.500	10.000	5.07%	456.25	3.75%	1.32%			118.99
696	05949QAN5	Customer Buy	05/23/06		94.500	28.000	5.07%	1,277.50	3.75%	1.32%			333.17
697	05949QAN5	Customer Buy	05/23/06		94.500	10.000	5.07%	456.25	3.75%	1.32%			118.99
698	05949QAN5	Customer Buy	05/23/06		94.500	12.000	5.07%	547.50	3.75%	1.32%			142.79
699	05949QAN5	Customer Buy	05/23/06		94.500	10.000	5.07%	456.25	3.75%	1.32%			118.99
700	05949QAN5	Customer Buy	05/23/06		94.500	18.000	5.07%	821.25	3.75%	1.32%			214.18
701	05949QAN5	Customer Buy	05/23/06		94.500	10.000	5.07%	456.25	3.75%	1.32%			118.99
702	05949QAN5	Customer Buy	05/23/06		94.500	10.000	5.07%	456.25	3.75%	1.32%			118.99
703	05949QAN5	Customer Buy	05/23/06		94.500	20.000	5.07%	912.50	3.75%	1.32%			237.98
704	05949QAN5	Customer Buy	05/23/06		94.500	10.000	5.07%	456.25	3.75%	1.32%			118.99
705	05949QAN5	Customer Buy	05/23/06		94.500	35.000	5.07%	1,596.88	3.75%	1.32%			416.46
706	05949QAN5	Customer Buy	05/23/06		94.500	32.000	5.07%	1,460.00	3.75%	1.32%			380.76
707	05949QAN5	Customer Buy	05/23/06		94.500	40.000	5.07%	1,825.00	3.75%	1.32%			475.95
708	05949QAN5	Customer Buy	05/23/06		94.500	20.000	5.07%	912.50	3.75%	1.32%			237.98
709	05949QAN5	Customer Buy	05/23/06		94.500	106.000	5.07%	4,836.25	3.75%	1.32%			1,261.27
710	05949QAN5	Customer Buy	05/23/06		94.250	30.000	4.80%	1,293.75	3.75%	1.05%			281.96
711	05949QAN5	Customer Buy	05/23/06		94.500	21.000	5.07%	958.13	3.75%	1.32%			249.87
712	05949QAN5	Customer Buy	05/23/06		94.500	12.000	5.07%	547.50	3.75%	1.32%			142.79
713	05949QAN5	Customer Buy	05/23/06		94.250	25.000	4.80%	1,078.13	3.75%	1.05%			234.96
714	05949QAN5	Customer Buy	05/23/06		94.250	10.000	4.80%	431.25	3.75%	1.05%			93.99
715	05949QAN5	Customer Buy	05/23/06		94.375	20.000	4.93%	887.50	3.75%	1.18%			212.97
716	05949QAN5	Customer Buy	05/23/06		94.500	20.000	5.07%	912.50	3.75%	1.32%			237.98
717	05949QAN5	Customer Buy	05/23/06		94.375	20.000	4.93%	887.50	3.75%	1.18%			212.97
718	05949QAN5	Customer Buy	05/23/06		94.250	50.000	4.80%	2,156.25	3.75%	1.05%			469.93
719	05949QAN5	Customer Buy	05/23/06		94.250	21.000	4.80%	905.63	3.75%	1.05%			197.37
720	05949QAN5	Customer Buy	05/23/06		94.250	27.000	4.80%	1,164.38	3.75%	1.05%			253.76

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup in Dollars		
721	2254582A5	DLA Buy	05/22/06	94.313	98.625	2,000,000	4.57%	1,580.38	3.00%	1.57%	563.60	
722	2254582A5	Customer Buy	05/23/06		98.625	38,000	4.57%	415.89	3.00%	1.57%	148.32	
723	2254582A5	Customer Buy	05/23/06		98.625	10,000	4.57%	1,705.15	3.00%	1.57%	608.10	
724	2254582A5	Customer Buy	05/23/06		98.625	41,000	4.57%	623.84	3.00%	1.57%	222.47	
725	2254582A5	Customer Buy	05/23/06		98.625	15,000	4.57%	831.78	3.00%	1.57%	296.63	
726	2254582A5	Customer Buy	05/23/06		98.625	20,000	4.57%	623.84	3.00%	1.57%	222.47	
727	2254582A5	Customer Buy	05/23/06		98.625	15,000	4.57%	623.84	3.00%	1.57%	222.47	
728	2254582A5	Customer Buy	05/23/06		98.125	15,000	4.04%	2,757.53	3.00%	1.04%	737.34	
729	2254582A5	Customer Buy	05/23/06		98.125	75,000	4.57%	415.89	3.00%	1.57%	148.32	
730	2254582A5	Customer Buy	05/23/06		98.125	10,000	4.04%	2,757.53	3.00%	1.04%	737.34	
731	2254582A5	Customer Buy	05/23/06		98.625	75,000	4.57%	540.66	3.00%	1.57%	192.81	
732	2254582A5	Customer Buy	05/23/06		98.625	13,000	4.57%	2,495.34	3.00%	1.57%	889.90	
733	2254582A5	Customer Buy	05/23/06		98.625	60,000	4.57%	1,247.67	3.00%	1.57%	444.95	
734	2254582A5	Customer Buy	05/23/06		98.625	30,000	4.57%	3,119.18	3.00%	1.57%	1,112.37	
735	2254582A5	Customer Buy	05/23/06		98.625	75,000	4.57%	2,911.23	3.00%	1.57%	1,038.22	
736	2254582A5	Customer Buy	05/23/06		98.625	70,000	4.57%	457.48	3.00%	1.57%	163.15	
737	2254582A5	Customer Buy	05/23/06		98.500	11,000	4.44%	605.75	3.00%	1.44%	203.72	
738	2254582A5	Customer Buy	05/23/06		98.500	15,000	4.44%	1,090.36	3.00%	1.44%	366.69	
739	2254582A5	Customer Buy	05/23/06		98.500	27,000	4.44%	1,211.51	3.00%	1.44%	407.43	
740	2254582A5	Customer Buy	05/23/06		98.500	30,000	4.44%	1,615.34	3.00%	1.44%	543.24	
741	2254582A5	Customer Buy	05/23/06		98.500	40,000	4.44%	807.67	3.00%	1.44%	271.62	
742	2254582A5	Customer Buy	05/23/06		98.125	20,000	4.04%	919.18	3.00%	1.04%	245.78	
743	2254582A5	Customer Buy	05/23/06		98.125	25,000	4.04%	919.18	3.00%	1.04%	245.78	
744	31393XSN8	DLA Buy	05/22/06	89.750	94.750	152,000	5.57%	6,250.00	3.95%	1.62%	1,818.56	
745	31393XSN8	Customer Buy	05/23/06		94.500	125,000	5.29%	712.50	3.95%	1.34%	180.73	
746	31394WYW2	DLA Buy	05/22/06	89.563	94.875	116,000	5.93%	6,162.50	3.95%	1.98%	2,058.75	
747	31395GTP7	DLA Buy	06/06/06	91.500	96.375	176,000	5.39%	975.00	3.50%	1.83%	334.51	
748	31395GTP7	Customer Buy	06/07/06		96.375	20,000	5.39%	2,096.25	3.50%	1.83%	719.19	
749	05946XU43	DLA Buy	06/08/06	91.875	96.875	2,000,000	5.44%	1,000.00	3.50%	1.94%	356.88	
750	05946XU43	Customer Buy	06/08/06		96.875	20,000	5.44%	1,550.00	3.50%	1.94%	553.16	
751	05946XU43	Customer Buy	06/08/06		96.875	31,000	5.44%	500.00	3.50%	1.94%	178.44	
752	05946XU43	Customer Buy	06/08/06		96.875	10,000	5.44%	950.00	3.50%	1.94%	339.04	

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
753	05946XU43	Customer Buy	06/08/06		96.875	17,000	5.44%	850.00	3.50%	1.94%	303.35
754	05946XU43	Customer Buy	06/08/06		96.875	10,000	5.44%	500.00	3.50%	1.94%	178.44
755	05946XU43	Customer Buy	06/08/06		96.875	20,000	5.44%	1,000.00	3.50%	1.94%	356.88
756	05946XU43	Customer Buy	06/08/06		96.875	35,000	5.44%	1,750.00	3.50%	1.94%	624.54
757	05946XU43	Customer Buy	06/08/06		96.875	31,000	5.44%	1,550.00	3.50%	1.94%	553.16
758	05946XU43	Customer Buy	06/09/06		96.875	25,000	5.44%	1,250.00	3.50%	1.94%	446.10
759	05946XU43	Customer Buy	06/09/06		96.875	64,000	5.44%	3,200.00	3.50%	1.94%	1,142.01
760	05946XU43	Customer Buy	06/09/06		96.875	25,000	5.44%	1,250.00	3.50%	1.94%	446.10
761	05946XU43	Customer Buy	06/09/06		96.875	40,000	5.44%	2,000.00	3.50%	1.94%	713.76
762	05946XU43	Customer Buy	06/09/06		96.875	20,000	5.44%	1,000.00	3.50%	1.94%	356.88
763	05946XU43	Customer Buy	06/09/06		96.875	50,000	5.44%	2,500.00	3.50%	1.94%	882.20
764	05946XU43	Customer Buy	06/09/06		96.875	20,000	5.44%	1,000.00	3.50%	1.94%	356.88
765	05946XU43	Customer Buy	06/09/06		96.875	28,000	5.44%	1,400.00	3.50%	1.94%	499.63
766	31396GCJ8	DLA Buy	06/13/06	95.500		1,000,000					
766	31396GCJ8	Customer Buy	06/14/06		100.000	15,000	4.71%	675.00	3.95%	0.76%	109.16
767	31396GCJ8	Customer Buy	06/14/06		100.000	90,000	4.71%	4,050.00	3.95%	0.76%	654.94
768	74161BAB1	DLA Buy	06/15/06	95.375		3,000,000					
768	74161BAB1	Customer Buy	06/15/06		100.125	16,000	4.98%	760.00	3.95%	1.03%	157.22
769	74161BAB1	Customer Buy	06/15/06		100.000	10,000	4.85%	462.50	3.95%	0.90%	85.77
770	74161BAB1	Customer Buy	06/16/06		100.125	35,000	4.98%	1,662.50	3.95%	1.03%	343.93
771	74161BAB1	Customer Buy	06/16/06		100.000	14,000	4.85%	647.50	3.95%	0.90%	120.08
772	74161BAB1	Customer Buy	06/16/06		100.000	10,000	4.85%	462.50	3.95%	0.90%	85.77
773	74161BAB1	Customer Buy	06/16/06		100.000	28,000	4.85%	1,295.00	3.95%	0.90%	240.16
774	74161BAB1	Customer Buy	06/16/06		99.500	10,000	4.33%	412.50	3.95%	0.38%	35.77
775	74161BAB1	Customer Buy	06/16/06		100.125	11,000	4.98%	522.50	3.95%	1.03%	108.09
776	74161BAB1	Customer Buy	06/16/06		100.125	20,000	4.98%	950.00	3.95%	1.03%	196.53
777	74161BAB1	Customer Buy	06/16/06		100.125	17,000	4.98%	807.50	3.95%	1.03%	167.05
778	74161BAB1	Customer Buy	06/16/06		100.125	25,000	4.98%	1,187.50	3.95%	1.03%	245.66
779	74161BAB1	Customer Buy	06/16/06		100.125	50,000	4.98%	2,375.00	3.95%	1.03%	491.32
780	74161BAB1	Customer Buy	06/16/06		100.125	15,000	4.98%	712.50	3.95%	1.03%	147.40
781	74161BAB1	Customer Buy	06/16/06		100.000	17,000	4.85%	786.25	3.95%	0.90%	145.81
782	74161BAB1	Customer Buy	06/16/06		100.125	10,000	4.98%	475.00	3.95%	1.03%	98.26
783	74161BAB1	Customer Buy	06/16/06		100.125	15,000	4.98%	712.50	3.95%	1.03%	147.40
784	74161BAB1	Customer Buy	06/16/06		100.125	11,000	4.98%	522.50	3.95%	1.03%	108.09
785	74161BAB1	Customer Buy	06/16/06		100.125	33,000	4.98%	1,567.50	3.95%	1.03%	324.27
786	74161BAB1	Customer Buy	06/16/06		100.000	40,000	4.85%	1,850.00	3.95%	0.90%	343.08
787	74161BAB1	Customer Buy	06/16/06		100.125	10,000	4.98%	475.00	3.95%	1.03%	98.26
788	74161BAB1	Customer Buy	06/16/06		100.125	11,000	4.98%	522.50	3.95%	1.03%	108.09

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup in Dollars		
789	225470VV2	DLA Buy	06/20/06	84.750	95.250	48,000	12.39%	630.00	3.00%		9.39%	477.45
790	225470VV2	Customer Buy	06/20/06		95.250	6,000	12.39%	630.00	3.00%		9.39%	
791	31396RMR5	DLA Buy	06/27/06	93.250	98.250	100,000	5.36%	750.00	3.95%		1.41%	197.49
792	31396RMR5	Customer Buy	06/28/06		98.250	15,000	5.36%	1,250.00	3.95%		1.41%	329.15
793	31396RMR5	Customer Buy	06/28/06		98.250	25,000	5.36%	1,000.00	3.95%		1.41%	263.32
794	31396RMR5	Customer Buy	06/28/06		98.250	20,000	5.36%	1,300.00	3.95%		1.41%	342.32
795	46628YANO	DLA Buy	06/29/06	96.625	101.375	2,000,000	4.92%	1,187.50	3.50%		1.42%	342.03
796	46628YANO	Customer Buy	06/29/06		101.375	25,000	4.92%	950.00	3.50%		1.42%	273.62
797	46628YANO	Customer Buy	06/30/06		101.375	20,000	4.92%	475.00	3.50%		1.42%	136.81
798	46628YAG5	DLA Buy	06/30/06	96.172	100.625	1,575,807	4.63%	667.97	3.50%		1.13%	163.07
799	46628YAH3	DLA Buy	07/12/06	95.375	99.875	500,000	4.72%	1,125.00	3.75%		0.97%	230.86
800	46628YAH3	Customer Buy	07/12/06		99.875	25,000	4.72%	900.00	3.75%		0.97%	184.68
801	46628YAH3	Customer Buy	07/12/06		99.875	20,000	4.72%	675.00	3.75%		0.97%	138.51
802	46628YAH3	Customer Buy	07/12/06		99.875	15,000	4.72%	2,250.00	3.75%		0.97%	461.71
803	46628YAH3	Customer Buy	07/13/06		99.875	50,000	4.72%	1,575.00	3.75%		0.97%	323.20
804	46628YAH3	Customer Buy	07/13/06		99.875	35,000	4.72%	450.00	3.75%		0.97%	92.34
805	46628YAH3	Customer Buy	07/13/06		100.000	10,000	4.85%	1,387.50	3.75%		1.10%	314.54
806	46628YAH3	Customer Buy	07/13/06		100.000	30,000	4.85%	462.50	3.75%		1.10%	104.85
807	46628YAH3	Customer Buy	07/13/06		99.925	10,000	4.77%	1,274.00	3.75%		1.02%	272.55
808	31395DD97	DLA Buy	07/12/06	96.438	101.000	500,000	4.73%	456.25	3.95%		0.78%	75.32
809	31396HBF5	DLA Buy	07/17/06	93.500	98.750	375,000	5.62%	2,625.00	3.95%		1.67%	778.39
810	31396HBF5	Customer Buy	07/18/06		98.750	50,000	5.62%	1,575.00	3.95%		1.67%	467.03
811	31396HBF5	Customer Buy	07/18/06		98.750	30,000	5.62%	787.50	3.95%		1.67%	233.52
812	31396HBF5	Customer Buy	07/18/06		98.750	15,000	5.62%	525.00	3.95%		1.67%	155.68
813	31396HBF5	Customer Buy	07/18/06		98.750	10,000	5.62%	420.00	3.95%		1.67%	124.54
814	31396HBF5	Customer Buy	07/18/06		98.750	8,000	5.62%	1,312.50	3.95%		1.67%	389.19
815	31396HBF5	Customer Buy	07/18/06		98.750	25,000	5.62%	525.00	3.95%		1.67%	155.68
816	31396HBF5	Customer Buy	07/18/06		98.750	10,000	5.62%	525.00	3.95%		1.67%	155.68

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO In Dollars	Markup Percentage	Expert's Max				Excess Markup Percentage	Excess Markup In Dollars
								Markup In Dollars	Markup Percentage				
817	31396HBF5	Customer Buy	07/18/06		97.500	85,000	4.28%	3,400.00	3.95%			0.33%	260.76
	94983SAM4	DLA Buy	07/17/06	94.844		750,000							
	94983SAM4	DLA Buy	07/17/06	94.844		500,000							
818	94983SAM4	Customer Buy	07/18/06		99.500	25,000	4.91%	1,164.06	3.50%			1.41%	334.18
819	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%			1.41%	133.67
820	94983SAM4	Customer Buy	07/18/06		99.500	25,000	4.91%	1,164.06	3.50%			1.41%	334.18
821	94983SAM4	Customer Buy	07/18/06		99.500	50,000	4.91%	2,328.13	3.50%			1.41%	668.37
822	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%			1.41%	133.67
823	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%			1.41%	133.67
824	94983SAM4	Customer Buy	07/18/06		99.500	30,000	4.91%	1,396.88	3.50%			1.41%	401.02
825	94983SAM4	Customer Buy	07/18/06		99.500	15,000	4.91%	698.44	3.50%			1.41%	200.51
826	94983SAM4	Customer Buy	07/18/06		99.500	15,000	4.91%	698.44	3.50%			1.41%	200.51
827	94983SAM4	Customer Buy	07/18/06		99.500	19,000	4.91%	884.69	3.50%			1.41%	253.98
828	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%			1.41%	133.67
829	94983SAM4	Customer Buy	07/18/06		99.500	34,000	4.91%	1,583.13	3.50%			1.41%	454.49
830	94983SAM4	Customer Buy	07/18/06		99.500	11,000	4.91%	512.19	3.50%			1.41%	147.04
831	94983SAM4	Customer Buy	07/18/06		99.500	27,000	4.91%	1,257.19	3.50%			1.41%	360.92
832	94983SAM4	Customer Buy	07/18/06		99.500	15,000	4.91%	698.44	3.50%			1.41%	200.51
833	94983SAM4	Customer Buy	07/18/06		99.500	81,000	4.91%	3,771.56	3.50%			1.41%	1,082.75
834	94983SAM4	Customer Buy	07/18/06		99.500	100,000	4.91%	4,656.25	3.50%			1.41%	1,336.73
835	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%			1.41%	133.67
836	94983SAM4	Customer Buy	07/18/06		99.500	25,000	4.91%	1,164.06	3.50%			1.41%	334.18
837	94983SAM4	Customer Buy	07/18/06		99.500	31,000	4.91%	1,443.44	3.50%			1.41%	414.39
838	94983SAM4	Customer Buy	07/18/06		99.500	47,000	4.91%	2,188.44	3.50%			1.41%	628.26
839	94983SAM4	Customer Buy	07/18/06		99.500	100,000	4.91%	4,656.25	3.50%			1.41%	1,336.73
840	94983SAM4	Customer Buy	07/18/06		99.500	25,000	4.91%	1,164.06	3.50%			1.41%	334.18
841	94983SAM4	Customer Buy	07/18/06		99.500	15,000	4.91%	698.44	3.50%			1.41%	200.51
842	94983SAM4	Customer Buy	07/18/06		99.500	15,000	4.91%	698.44	3.50%			1.41%	200.51
843	94983SAM4	Customer Buy	07/18/06		99.500	30,000	4.91%	1,396.88	3.50%			1.41%	401.02
844	94983SAM4	Customer Buy	07/18/06		99.500	15,000	4.91%	698.44	3.50%			1.41%	200.51
845	94983SAM4	Customer Buy	07/18/06		99.500	9,000	4.91%	419.06	3.50%			1.41%	120.31
846	94983SAM4	Customer Buy	07/18/06		99.500	11,000	4.91%	512.19	3.50%			1.41%	147.04
847	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%			1.41%	133.67
848	94983SAM4	Customer Buy	07/18/06		99.375	25,000	4.78%	1,132.81	3.50%			1.28%	302.93
849	94983SAM4	Customer Buy	07/18/06		99.375	45,000	4.78%	2,039.06	3.50%			1.28%	545.28
850	94983SAM4	Customer Buy	07/18/06		99.500	25,000	4.91%	1,164.06	3.50%			1.41%	334.18
851	94983SAM4	Customer Buy	07/18/06		99.500	16,000	4.91%	745.00	3.50%			1.41%	213.88
852	94983SAM4	Customer Buy	07/18/06		99.500	30,000	4.91%	1,396.88	3.50%			1.41%	401.02
853	94983SAM4	Customer Buy	07/18/06		99.500	20,000	4.91%	931.25	3.50%			1.41%	267.35
854	94983SAM4	Customer Buy	07/18/06		99.500	26,000	4.91%	1,210.63	3.50%			1.41%	347.55

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup		
855	94983SAM4	Customer Buy	07/18/06		99.500	40,000	4.91%	1,862.50	3.50%		1.41%	534.69
856	94983SAM4	Customer Buy	07/18/06		99.500	18,000	4.91%	838.13	3.50%		1.41%	240.61
857	94983SAM4	Customer Buy	07/18/06		99.375	10,000	4.78%	453.13	3.50%		1.28%	121.17
858	94983SAM4	Customer Buy	07/18/06		99.375	25,000	4.78%	1,132.81	3.50%		1.28%	302.93
859	94983SAM4	Customer Buy	07/18/06		99.500	15,000	4.91%	698.44	3.50%		1.41%	200.51
860	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%		1.41%	133.67
861	94983SAM4	Customer Buy	07/18/06		99.500	10,000	4.91%	465.63	3.50%		1.41%	133.67
862	94983SAM4	Customer Buy	07/18/06		99.500	25,000	4.91%	1,164.06	3.50%		1.41%	334.18
863	94983SAM4	Customer Buy	07/18/06		99.500	20,000	4.91%	931.25	3.50%		1.41%	267.35
864	31395E2N6	DLA Buy	07/19/06	89.750		30,000						
	31395E2N6	Customer Buy	07/19/06		96.000	23,000	6.96%	1,437.50	3.95%		3.01%	622.12
865	22942JAG8	DLA Buy	07/20/06	93.250		2,253,000						
	22942JAG8	Customer Buy	07/20/06		97.875	50,000	4.96%	2,312.50	3.95%		1.01%	470.82
	22942JAG8	Customer Buy	07/20/06		97.875	10,000	4.96%	462.50	3.95%		1.01%	94.16
	22942JAG8	Customer Buy	07/20/06		97.875	18,000	4.96%	832.50	3.95%		1.01%	169.49
	22942JAG8	Customer Buy	07/20/06		97.875	28,000	4.96%	1,295.00	3.95%		1.01%	263.66
	22942JAG8	Customer Buy	07/21/06		97.000	25,000	4.02%	937.50	3.95%		0.07%	16.65
	22942JAG8	Customer Buy	07/21/06		98.000	17,000	5.09%	807.50	3.95%		1.14%	181.32
	22942JAG8	Customer Buy	07/21/06		97.875	10,000	4.96%	462.50	3.95%		1.01%	94.16
	22942JAG8	Customer Buy	07/21/06		98.000	15,000	5.09%	712.50	3.95%		1.14%	159.99
	22942JAG8	Customer Buy	07/21/06		98.000	30,000	5.09%	1,425.00	3.95%		1.14%	319.98
874	22942JAG8	Customer Buy	07/21/06		97.875	10,000	4.96%	462.50	3.95%		1.01%	94.16
875	31396FGE7	DLA Buy	07/24/06	90.000		1,500,000						
	31396FGE7	Customer Buy	07/25/06		94.625	16,000	5.14%	740.00	3.95%		1.19%	171.20
	31396FGE7	Customer Buy	07/25/06		94.625	11,000	5.14%	508.75	3.95%		1.19%	117.70
	31396FGE7	Customer Buy	07/25/06		94.625	50,000	5.14%	2,312.50	3.95%		1.19%	535.01
	31396FGE7	Customer Buy	07/25/06		94.625	15,000	5.14%	693.75	3.95%		1.19%	160.50
	31396FGE7	Customer Buy	07/25/06		94.625	10,000	5.14%	462.50	3.95%		1.19%	107.00
	31396FGE7	Customer Buy	07/25/06		94.625	15,000	5.14%	693.75	3.95%		1.19%	160.50
	31396FGE7	Customer Buy	07/25/06		94.625	35,000	5.14%	1,618.75	3.95%		1.19%	374.50
	31396FGE7	Customer Buy	07/25/06		94.625	14,000	5.14%	647.50	3.95%		1.19%	149.80
	31396FGE7	Customer Buy	07/25/06		94.625	10,000	5.14%	462.50	3.95%		1.19%	107.00
884	31396FGE7	Customer Buy	07/25/06		94.625	20,000	5.14%	925.00	3.95%		1.19%	214.00
885	31396FGE7	Customer Buy	07/25/06		94.625	10,000	5.14%	462.50	3.95%		1.19%	107.00
886	31396FGE7	Customer Buy	07/25/06		94.625	14,000	5.14%	647.50	3.95%		1.19%	149.80
887	31396FGE7	Customer Buy	07/25/06		94.625	64,000	5.14%	2,960.00	3.95%		1.19%	684.81
888	31396FGE7	Customer Buy	07/25/06		94.625	50,000	5.14%	2,312.50	3.95%		1.19%	535.01
889	31396FGE7	Customer Buy	07/25/06		94.625	12,000	5.14%	555.00	3.95%		1.19%	128.40

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars		
890	31396FGE7	Customer Buy	07/25/06		94.625	15,000	5.14%	693.75	3.95%		1.19%		160.50
891	31396FGE7	Customer Buy	07/25/06		94.625	40,000	5.14%	1,850.00	3.95%		1.19%		428.00
892	05950BAF1	DLA Buy	07/31/06	93.750		1,870,800							
		Customer Buy	08/01/06		98.375	20,000	4.93%	925.00	3.95%		0.98%		184.37
893	05950BAF1	Customer Buy	08/01/06		98.375	18,000	4.93%	832.50	3.95%		0.98%		165.93
894	05950BAF1	Customer Buy	08/01/06		98.375	15,000	4.93%	693.75	3.95%		0.98%		138.28
895	05950BAF1	Customer Buy	08/01/06		98.375	25,000	4.93%	1,156.25	3.95%		0.98%		230.46
896	05950BAF1	Customer Buy	08/01/06		98.375	10,000	4.93%	462.50	3.95%		0.98%		92.18
897	05950BAF1	Customer Buy	08/01/06		98.375	18,000	4.93%	832.50	3.95%		0.98%		165.93
898	05950BAF1	Customer Buy	08/01/06		98.375	30,000	4.93%	1,387.50	3.95%		0.98%		276.55
899	05950BAF1	Customer Buy	08/01/06		98.375	25,000	4.93%	1,156.25	3.95%		0.98%		230.46
900	05950BAF1	Customer Buy	08/01/06		98.375	10,000	4.93%	462.50	3.95%		0.98%		92.18
901	05950BAF1	Customer Buy	08/01/06		98.375	10,000	4.93%	462.50	3.95%		0.98%		92.18
902	05950BAF1	Customer Buy	08/01/06		98.375	24,000	4.93%	1,110.00	3.95%		0.98%		221.24
903	05950BAF1	Customer Buy	08/01/06		98.375	19,000	4.93%	878.75	3.95%		0.98%		175.15
904	05950BAF1	Customer Buy	08/01/06		98.375	30,000	4.93%	1,387.50	3.95%		0.98%		276.55
905	05950BAF1	Customer Buy	08/01/06		98.375	70,000	4.93%	3,237.50	3.95%		0.98%		645.29
906	05950BAF1	Customer Buy	08/01/06		98.375	100,000	4.93%	4,625.00	3.95%		0.98%		921.84
907	05950BAF1	Customer Buy	08/01/06		98.375	25,000	4.93%	1,156.25	3.95%		0.98%		230.46
908	05950BAF1	Customer Buy	08/01/06		98.375	10,000	4.93%	462.50	3.95%		0.98%		92.18
909	05950BAF1	Customer Buy	08/01/06		98.375	40,000	4.93%	1,850.00	3.95%		0.98%		368.74
910	05950BAF1	Customer Buy	08/01/06		98.375	200,000	4.93%	9,250.00	3.95%		0.98%		1,843.69
911	05950BAF1	Customer Buy	08/01/06		97.875	50,000	4.40%	2,062.50	3.95%		0.45%		210.94
912	05950BAF1	Customer Buy	08/01/06		98.375	25,000	4.93%	1,156.25	3.95%		0.98%		230.46
913	05950BAF1	Customer Buy	08/01/06		98.375	100,000	4.93%	4,625.00	3.95%		0.98%		921.84
914	05950BAF1	Customer Buy	08/01/06		98.375	50,000	4.93%	2,312.50	3.95%		0.98%		460.92
915	05950BAF1	Customer Buy	08/01/06		98.375	14,000	4.93%	647.50	3.95%		0.98%		129.06
916	05950BAF1	Customer Buy	08/01/06		98.375	12,000	4.93%	555.00	3.95%		0.98%		110.62
917	94983SAMA	DLA Buy	07/31/06	95.422		500,000							
		Customer Buy	08/01/06		100.000	30,000	4.80%	1,373.44	3.50%		1.30%		371.52
918	94983SAMA	Customer Buy	08/01/06		100.000	22,000	4.80%	1,007.19	3.50%		1.30%		272.45
919	94983SAMA	Customer Buy	08/01/06		100.000	10,000	4.80%	457.81	3.50%		1.30%		123.84
920	94983SAMA	Customer Buy	08/01/06		100.000	15,000	4.80%	686.72	3.50%		1.30%		185.76
921	94983SAMA	Customer Buy	08/01/06		100.000	30,000	4.80%	1,373.44	3.50%		1.30%		371.52
922	94983SAMA	Customer Buy	08/01/06		100.000	23,000	4.80%	1,052.97	3.50%		1.30%		284.83
923	94983SAMA	Customer Buy	08/01/06		100.000	15,000	4.80%	686.72	3.50%		1.30%		185.76
924	94983SAMA	Customer Buy	08/01/06		100.000	40,000	4.80%	1,831.25	3.50%		1.30%		495.35
925	94983SAMA	Customer Buy	08/01/06		100.000	83,000	4.80%	3,799.84	3.50%		1.30%		1,027.86
926	94983SAMA	Customer Buy	08/01/06		100.000	100,000	4.80%	4,578.13	3.50%		1.30%		1,238.39

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Percentage		
927	94983SAM4	Customer Buy	08/01/06		100.000	10,000	4.80%	457.81	3.50%	1.30%	123.84
928	05948XWT4	DLA Buy	08/01/06	84.531		54,000					
	05948XWT4	Customer Buy	08/02/06		92.125	36,000	8.98%	2,733.75	3.95%	5.03%	1,531.72
929	02147QAF9	DLA Buy	08/02/06	93.750		2,817,000					
	02147QAF9	Customer Buy	08/03/06		98.375	50,000	4.93%	2,312.50	3.95%	0.98%	460.92
930	02147QAF9	Customer Buy	08/03/06		98.375	100,000	4.93%	4,625.00	3.95%	0.98%	921.84
931	02147QAF9	Customer Buy	08/03/06		98.500	13,000	5.07%	617.50	3.95%	1.12%	136.10
932	02147QAF9	Customer Buy	08/03/06		98.500	10,000	5.07%	475.00	3.95%	1.12%	104.69
933	02147QAF9	Customer Buy	08/03/06		98.375	80,000	4.93%	3,700.00	3.95%	0.98%	737.48
934	94983SAM4	DLA Buy	08/02/06	95.578		250,000					
	94983SAM4	Customer Buy	08/03/06		100.000	20,000	4.63%	884.38	3.50%	1.13%	215.34
	94983SAM4	Customer Buy	08/03/06		100.125	10,000	4.76%	454.69	3.50%	1.26%	120.16
	94983SAM4	Customer Buy	08/03/06		100.000	16,000	4.63%	707.50	3.50%	1.13%	172.27
937	94983SAM4	Customer Buy	08/03/06		100.125	10,000	4.76%	454.69	3.50%	1.26%	120.16
938	12668AC29	DLA Buy	08/07/06	90.500		43,000					
	12668AC29	Customer Buy	08/08/06		99.125	43,000	9.53%	3,708.75	3.50%	6.03%	2,346.73
939	61749JAL0	DLA Buy	08/07/06	94.875		300,000					
	61749JAL0	Customer Buy	08/08/06		99.375	150,000	4.74%	6,750.00	3.95%	0.79%	1,128.68
940	05950GBJ1	DLA Buy	08/14/06	96.625		1,763,732					
	05950GBJ1	Customer Buy	08/15/06		101.250	15,000	4.79%	693.75	3.95%	0.84%	121.24
941	05950GBJ1	Customer Buy	08/15/06		101.250	56,000	4.79%	2,590.00	3.95%	0.84%	452.63
942	05950GBJ1	Customer Buy	08/15/06		101.250	35,000	4.79%	1,618.75	3.95%	0.84%	282.89
943	05950GBJ1	Customer Buy	08/15/06		101.250	10,000	4.79%	462.50	3.95%	0.84%	80.83
944	05950GBJ1	Customer Buy	08/15/06		101.250	20,000	4.79%	925.00	3.95%	0.84%	161.65
945	05950GBJ1	Customer Buy	08/15/06		101.250	15,000	4.79%	693.75	3.95%	0.84%	121.24
946	05950GBJ1	Customer Buy	08/15/06		101.250	13,000	4.79%	601.25	3.95%	0.84%	105.07
947	05950GBJ1	Customer Buy	08/15/06		101.250	13,000	4.79%	601.25	3.95%	0.84%	105.07
948	05950GBJ1	Customer Buy	08/15/06		101.250	16,000	4.79%	740.00	3.95%	0.84%	129.32
949	05950GBJ1	Customer Buy	08/15/06		101.250	85,000	4.79%	3,931.25	3.95%	0.84%	687.03
950	05950GBJ1	Customer Buy	08/15/06		101.250	21,000	4.79%	971.25	3.95%	0.84%	169.74
951	05950GBJ1	Customer Buy	08/15/06		101.250	25,000	4.79%	1,156.25	3.95%	0.84%	202.07
952	05950GBJ1	Customer Buy	08/15/06		101.500	20,000	5.05%	975.00	3.95%	1.10%	211.67
953	05950GBJ1	Customer Buy	08/15/06		101.250	45,000	4.79%	2,081.25	3.95%	0.84%	363.72
954	05950GBJ1	Customer Buy	08/15/06		101.250	100,000	4.79%	4,625.00	3.95%	0.84%	808.27
955	05950GBJ1	Customer Buy	08/15/06		101.250	100,000	4.79%	4,625.00	3.95%	0.84%	808.27

Transaction Number	CMO Cusip	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO In Dollars	Markup Percentage	Markup In Dollars	Expert's Max			Excess Markup Percentage	Excess Markup In Dollars
									Markup Percentage				
956	05950GBJ1	Customer Buy	08/15/06		101.500	70,000	5.05%	3,412.50	3.95%			1.10%	740.83
957	05950GBJ1	Customer Buy	08/15/06		101.625	10,000	5.17%	500.00	3.95%			1.22%	118.33
958	05950GBJ1	Customer Buy	08/15/06		101.300	50,000	4.84%	2,337.50	3.95%			0.89%	429.16
959	126694AD0	DLA Buy	08/15/06	84.750		200,000							
960	126694AD0	Customer Buy	08/15/06		90.250	15,000	6.49%	825.00	3.95%			2.54%	322.86
	126694AD0	Customer Buy	08/15/06		90.250	40,000	6.49%	2,200.00	3.95%			2.54%	860.96
961	05950FAC8	DLA Buy	08/15/06	94.625		2,898,000							
962	05950FAC8	Customer Buy	08/16/06		99.250	10,000	4.89%	462.50	3.95%			0.94%	88.73
963	05950FAC8	Customer Buy	08/16/06		99.500	100,000	5.15%	4,875.00	3.95%			1.20%	1,137.30
964	05950FAC8	Customer Buy	08/16/06		99.250	150,000	4.89%	6,937.50	3.95%			0.94%	1,330.95
965	05950FAC8	Customer Buy	08/16/06		99.250	100,000	4.89%	4,825.00	3.95%			0.94%	887.30
966	05950FAC8	Customer Buy	08/16/06		99.000	25,000	4.62%	1,093.75	3.95%			0.67%	159.32
967	05950FAC8	Customer Buy	08/16/06		99.250	125,000	4.89%	5,781.25	3.95%			0.94%	1,109.12
968	05950FAC8	Customer Buy	08/16/06		99.000	375,000	4.62%	16,406.25	3.95%			0.67%	2,389.87
	05950FAC8	Customer Buy	08/16/06		99.550	30,000	5.20%	1,477.50	3.95%			1.25%	356.21
969	172973N96	DLA Buy	08/16/06	83.000		31,000							
	172973N96	Customer Buy	08/17/06		88.750	17,000	6.93%	977.54	3.75%			3.18%	448.42
970	172973N96	DLA Buy	08/22/06	83.000		60,000							
	172973N96	Customer Buy	08/22/06		89.000	10,000	7.23%	600.00	3.75%			3.48%	288.75
971	93934FBK7	DLA Buy	08/22/06	88.000		10,000							
	93934FBK7	Customer Buy	08/23/06		93.625	10,000	6.39%	562.50	3.95%			2.44%	214.90
972	94984AAV2	DLA Buy	21/06	95.781		2,000,000							
973	94984AAV2	Customer Buy	22/06		100.000	19,000	4.40%	801.56	3.00%			1.40%	255.61
974	94984AAV2	Customer Buy	22/06		100.250	10,000	4.67%	446.88	3.00%			1.67%	159.53
975	94984AAV2	Customer Buy	22/06		100.250	25,000	4.67%	1,117.19	3.00%			1.67%	398.83
976	94984AAV2	Customer Buy	22/06		100.250	30,000	4.67%	1,340.63	3.00%			1.67%	478.60
977	94984AAV2	Customer Buy	22/06		100.250	35,000	4.67%	1,564.06	3.00%			1.67%	558.36
978	94984AAV2	Customer Buy	22/06		100.250	25,000	4.67%	1,117.19	3.00%			1.67%	398.83
979	94984AAV2	Customer Buy	22/06		100.250	15,000	4.67%	670.31	3.00%			1.67%	239.30
980	94984AAV2	Customer Buy	22/06		99.750	30,000	4.14%	1,190.63	3.00%			1.14%	328.61
981	94984AAV2	Customer Buy	22/06		100.250	10,000	4.67%	446.88	3.00%			1.67%	159.53
982	94984AAV2	Customer Buy	22/06		100.250	150,000	4.67%	6,703.13	3.00%			1.67%	2,392.99
983	94984A	Customer Buy	22/06		100.250	10,000	4.67%	446.88	3.00%			1.67%	159.53
	94984A	Customer Buy	22/06		100.000	100,000	4.40%	4,218.75	3.00%			1.40%	1,345.34
984	94984A	Customer Buy	22/06		100.250	18,000	4.67%	804.38	3.00%			1.67%	287.16

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
985	94984AAV2	Customer Buy	08/22/06		100.250	24,000	4.67%	1,072.50	3.00%		1.67%	382.88
986	94984AAV2	Customer Buy	08/22/06		100.250	10,000	4.67%	446.88	3.00%		1.67%	159.53
987	94984AAV2	Customer Buy	08/22/06		100.000	100,000	4.40%	4,218.75	3.00%		1.40%	1,345.34
988	94984AAV2	Customer Buy	08/22/06		100.000	57,000	4.40%	2,404.69	3.00%		1.40%	766.84
989	94984AAV2	Customer Buy	08/22/06		100.250	10,000	4.67%	446.88	3.00%		1.67%	159.53
990	94984AAV2	Customer Buy	08/22/06		100.250	20,000	4.67%	893.75	3.00%		1.67%	319.07
991	94984AAV2	Customer Buy	08/22/06		100.250	15,000	4.67%	670.31	3.00%		1.67%	239.30
992	05950GAU7	DLA Buy	08/23/06	95.313	100.000	2,052,301	4.92%	703.13	3.95%		0.97%	138.39
993	05950GAU7	Customer Buy	08/24/06		100.000	15,000	4.92%	6,656.25	3.95%		0.97%	1,310.13
994	05950GAU7	Customer Buy	08/24/06		100.000	14,000	4.92%	656.25	3.95%		0.97%	129.17
995	05950GAU7	Customer Buy	08/24/06		100.000	49,000	4.92%	2,296.88	3.95%		0.97%	452.09
996	05950GAU7	Customer Buy	08/24/06		100.000	40,000	4.92%	1,875.00	3.95%		0.97%	369.05
997	05950GAU7	Customer Buy	08/24/06		100.000	80,000	4.92%	3,750.00	3.95%		0.97%	738.10
998	31396TTP8	DLA Buy	08/23/06	96.875	101.750	1,711,345	5.03%	487.50	3.95%		1.08%	104.85
999	31396TTP8	Customer Buy	08/23/06		101.750	10,000	5.03%	487.50	3.95%		1.08%	104.85
1000	31396EP26	DLA Buy	09/07/06	95.375	100.125	3,700,000	4.98%	4,750.00	3.95%		1.03%	982.65
1001	31396EP26	Customer Buy	09/08/06		100.000	100,000	4.85%	3,468.75	3.95%		0.90%	643.28
1002	31395M2L2	DLA Buy	09/12/06	91.000	97.125	35,000	6.73%	612.50	3.95%		2.78%	253.05
1003	31393DKT7	DLA Buy	09/18/06	86.250	90.500	40,000	4.93%	1,275.00	3.95%		0.98%	252.93
1004	31393DKT7	Customer Buy	09/19/06		90.500	10,000	4.93%	425.00	3.95%		0.98%	84.31
1005	31395M2T5	DLA Buy	09/19/06	90.750	95.625	250,000	5.37%	4,875.00	3.95%		1.42%	1,290.37
1006	31394BGT5	DLA Buy	09/20/06	86.000	91.875	45,000	6.83%	528.75	3.95%		2.88%	223.02
1007	31394BGT5	Customer Buy	09/21/06		91.000	29,000	5.81%	1,450.01	3.95%		1.86%	464.88
1008	02146TAB3	DLA Buy	09/27/06	97.156	101.875	1,100,000	4.86%	471.88	3.00%		1.86%	180.41
1009	02146TAB3	Customer Buy	09/28/06		101.875	10,000	4.86%	23,593.75	3.00%		1.86%	9,020.45

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		
									Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
1010	22942KAF7	DLA Buy	09/27/06	96.500	101.000	1,000.000	4.66%	675.00	3.95%	0.71%	103.24
1011	22942KAF7	Customer Buy	09/28/06		101.000	15,000	4.66%	675.00	3.95%	0.71%	103.24
1012	126694CZ9	DLA Buy	09/28/06	92.000		146,000	5.16%	712.50	3.95%	1.21%	167.39
1013	31394UTZ5	DLA Buy	10/03/06	94.500		1,679,000	4.06%	3,293.75	3.75%	0.31%	247.08
1014	31394UTZ5	Customer Buy	10/04/06		99.375	85,000	4.06%	7,207.50	3.75%	0.31%	540.67
1015	05948KPR4	DLA Buy	10/10/06	94.250		50,000	5.97%	2,812.50	3.95%	2.02%	951.08
1016	05946XNW9	DLA Buy	10/11/06	90.250		20,000	9.42%	1,700.00	3.95%	5.47%	987.03
1017	225470UT8	DLA Buy	10/11/06	94.125		50,000	6.24%	2,350.00	3.00%	3.24%	1,220.50
1018	05946XV42	DLA Buy	10/16/06	95.750		96,000	4.70%	2,070.00	3.95%	0.75%	330.21
1019	05946XV42	Customer Buy	10/17/06		100.250	46,000	4.70%	2,250.00	3.95%	0.75%	358.92
1020	23242WAM1	DLA Buy	10/16/06	97.188		225,000	4.05%	1,968.75	3.95%	0.10%	49.27
1021	23242WAM1	Customer Buy	10/17/06		101.125	50,000	4.05%	1,968.75	3.95%	0.10%	49.27
1022	02147MAK7	DLA Buy	10/17/06	95.859		5,250,000	4.97%	1,429.69	3.95%	1.02%	293.76
1023	225470N25	DLA Buy	10/19/06	94.250		20,000	6.10%	977.50	3.95%	2.15%	344.61
1024	02146TAD9	DLA Buy	10/23/06	96.125		325,000	4.55%	14,218.75	3.95%	0.60%	1,878.81
1025	17310FAK1	DLA Buy	10/30/06	96.750		1,000,000	4.52%	656.25	3.75%	0.77%	112.04
1026	17310FAK1	Customer Buy	10/31/06		101.625	12,000	5.04%	585.00	3.75%	1.29%	149.63
1027	17310FAK1	Customer Buy	10/31/06		101.375	22,000	4.78%	1,017.50	3.75%	1.03%	219.32

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Markup in Dollars	Excess Markup Percentage		
1028	31396LVU1 31396LVU1	DLA Buy Customer Buy	10/31/06 10/31/06	96.375	100.375	115,000 115,000	4.15%	4,600.00	3.95%		0.20%		222.22
1029	172973N96 172973N96	DLA Buy Customer Buy	11/01/06 11/01/06	83.250	89.750	64,000 10,000	7.81%	650.00	3.75%		4.06%		337.81
1030	22541SULO	DLA Buy	11/02/06	91.750		184,000							
1031	22541SULO	Customer Buy	11/02/06		96.500	25,000	5.18%	1,187.50	3.95%		1.23%		281.47
1032	22541SULO	Customer Buy	11/02/06		96.500	10,000	5.18%	475.00	3.95%		1.23%		112.59
1033	22541SULO	Customer Buy	11/03/06		96.125	70,000	5.18%	3,325.00	3.95%		1.23%		788.10
1034	31394XCF1	DLA Buy	11/02/06	95.000		31,000	4.77%	1,356.25	3.95%		0.82%		232.77
1035	31394XCF1 31394XCF1	Customer Buy Customer Buy	11/03/06 11/03/06		99.875 99.875	100,000 50,000	5.13%	2,437.50	3.95%		1.18%		561.26
1036	31396LVU1	DLA Buy	11/02/06	96.375		25,000	5.13%	1,218.75	3.95%		1.18%		280.63
1037	31396LVU1 31396LVU1	DLA Buy Customer Buy	11/03/06 11/03/06		100.750	75,000 75,000	4.54%	3,281.25	3.95%		0.59%		426.17
1038	31396LVU1	DLA Buy	11/06/06	96.000		125,000							
1039	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	50,000 75,000	4.30%	2,062.50	3.95%		0.35%		166.51
1040	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1041	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1042	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1043	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1044	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1045	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1046	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1047	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1048	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1049	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1050	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77
1051	31396LVU1 31396LVU1	Customer Buy Customer Buy	11/07/06 11/07/06		100.125 100.125	75,000 75,000	4.30%	3,093.75	3.95%		0.35%		249.77

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
1052	45660LL56	Customer Buy	11/14/06		98.750	15,000	4.71%	665.63	3.95%	0.76%	106.82
1053	45660LL56	Customer Buy	11/14/06		98.750	30,000	4.71%	1,331.25	3.95%	0.76%	213.65
1054	45660LL56	Customer Buy	11/14/06		98.750	15,000	4.71%	665.63	3.95%	0.76%	106.82
1055	172973N96	DLA Buy	11/14/06	84.000		16,000					
	172973N96	Customer Buy	11/14/06		92.000	10,000	9.52%	800.00	3.75%	5.77%	485.00
1056	45660LL56	DLA Buy	11/16/06	94.438		500,000					
	45660LL56	Customer Buy	11/16/06		99.000	36,000	4.83%	1,642.50	3.95%	0.88%	299.59
	45660LL56	Customer Buy	11/16/06		99.000	30,000	4.83%	1,368.75	3.95%	0.88%	249.66
	45660LL56	Customer Buy	11/17/06		99.000	30,000	4.83%	1,368.75	3.95%	0.88%	249.66
	45660LL56	Customer Buy	11/17/06		99.000	10,000	4.83%	456.25	3.95%	0.88%	83.22
1060	45660LL56	Customer Buy	11/17/06		99.000	17,000	4.83%	775.63	3.95%	0.88%	141.47
1061	31394UTU6	DLA Buy	11/20/06	96.750		723,000					
	31394UTU6	Customer Buy	11/21/06		101.375	200,000	4.78%	9,250.00	3.95%	0.83%	1,606.82
1062	31394UTU6	Customer Buy	11/21/06		101.375	10,000	4.78%	462.50	3.95%	0.83%	80.34
1063	31394UTZ5	DLA Buy	11/20/06	96.125		1,128,000					
	31394UTZ5	Customer Buy	11/21/06		100.500	20,000	4.55%	875.00	3.75%	0.80%	154.07
	31394UTZ5	Customer Buy	11/21/06		100.500	200,000	4.55%	8,750.00	3.75%	0.80%	1,540.69
	31394UTZ5	Customer Buy	11/21/06		100.500	50,000	4.55%	2,187.50	3.75%	0.80%	385.17
	31394UTZ5	Customer Buy	11/21/06		100.500	12,000	4.55%	525.00	3.75%	0.80%	92.44
1066	31394UTZ5	Customer Buy	11/21/06		100.500	45,000	4.55%	1,968.75	3.75%	0.80%	346.66
1067	31394UTZ5	Customer Buy	11/21/06		100.500	50,000	4.55%	2,187.50	3.75%	0.80%	385.17
1068	31394UTZ5	Customer Buy	11/21/06		100.500	41,000	4.55%	1,793.75	3.75%	0.80%	315.84
1070	45660LL56	DLA Buy	11/20/06	94.625		250,000					
	45660LL56	Customer Buy	11/20/06		99.250	83,000	4.89%	3,838.75	3.95%	0.94%	736.46
	45660LL56	Customer Buy	11/21/06		99.250	34,000	4.89%	1,572.50	3.95%	0.94%	301.68
	45660LL56	Customer Buy	11/21/06		99.250	19,000	4.89%	878.75	3.95%	0.94%	168.59
	45660LL56	Customer Buy	11/21/06		99.250	10,000	4.89%	462.50	3.95%	0.94%	88.73
1073	45660LL56	Customer Buy	11/21/06		99.250	30,000	4.89%	1,387.50	3.95%	0.94%	266.19
1074	45660LL56	Customer Buy	11/21/06		99.250	20,000	4.89%	925.00	3.95%	0.94%	177.46
1075	45660LL56	Customer Buy	11/21/06		99.250	50,000	4.89%	2,312.50	3.95%	0.94%	443.65
1076	31396FGL1	DLA Buy	11/21/06	96.375		25,000					
1077	31396FGL1	Customer Buy	11/21/06		101.250	11,000	5.06%	536.25	3.95%	1.11%	117.50
1078	05946XSS3	DLA Buy	11/28/06	95.625		141,000					
	05946XSS3	Customer Buy	11/28/06		100.125	130,000	4.71%	5,850.00	3.50%	1.21%	1,499.08

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1079	05946XSS3	Customer Buy	11/29/06		100.125	11,000	4.71%	495.00	3.50%		1.21%	126.85
1080	05946XN66	DLA Buy	11/30/06	93.625		115,000	4.94%	1,988.75	3.95%		0.99%	398.52
1081	05946XN66	Customer Buy	12/01/06		98.250	43,000	5.15%	2,412.50	3.95%		1.20%	563.39
1082	05948XC82	DLA Buy	12/01/06	94.750		27,000	5.15%	1,316.25	3.00%		2.15%	548.77
1083	12667GLC5	DLA Buy	12/01/06	94.250		75,000	5.04%	570.00	3.75%		1.29%	145.88
1084	126694CL0	DLA Buy	12/01/06	93.000		40,000	5.38%	500.00	3.95%		1.43%	132.65
1085	45660LL56	DLA Buy	12/04/06	95.094		1,250,000	4.90%	1,164.06	3.95%		0.95%	225.02
1086	45660LL56	Customer Buy	12/05/06		99.750	25,000	4.90%	605.31	3.95%		0.95%	117.01
1087	45660LL56	Customer Buy	12/05/06		99.750	13,000	4.90%	465.63	3.95%		0.95%	90.01
1088	45660LL56	Customer Buy	12/05/06		99.750	10,000	4.90%	1,862.50	3.95%		0.95%	360.03
1089	45660LL56	Customer Buy	12/05/06		99.750	40,000	4.90%	1,257.19	3.95%		0.95%	243.02
1090	45660LL56	Customer Buy	12/05/06		99.750	27,000	4.90%	1,164.06	3.95%		0.95%	225.02
1091	45660LL56	Customer Buy	12/05/06		99.750	25,000	4.90%	465.63	3.95%		0.95%	90.01
1092	45660LL56	Customer Buy	12/05/06		99.750	10,000	4.90%	2,328.13	3.95%		0.95%	450.03
1093	45660LL56	Customer Buy	12/05/06		99.750	50,000	4.90%	1,396.88	3.95%		0.95%	270.02
1094	45660LL56	Customer Buy	12/05/06		99.750	30,000	4.90%	485.63	3.95%		0.95%	90.01
1095	45660LL56	Customer Buy	12/05/06		99.750	10,000	4.90%	1,164.06	3.95%		0.95%	225.02
1096	45660LL56	Customer Buy	12/05/06		99.750	25,000	4.90%	931.20	3.95%		0.95%	180.01
1097	45660LL56	Customer Buy	12/05/06		99.750	20,000	4.90%	2,514.38	3.95%		0.95%	486.03
1098	45660LL56	Customer Buy	12/05/06		99.750	54,000	4.90%	465.63	3.95%		0.95%	90.01
1099	45660LL56	Customer Buy	12/05/06		99.750	10,000	4.90%	931.25	3.95%		0.95%	180.01
1100	45660LL56	Customer Buy	12/05/06		99.750	20,000	4.90%	931.25	3.95%		0.95%	180.01
1101	45660LL56	Customer Buy	12/05/06		99.750	13,000	4.90%	605.31	3.95%		0.95%	117.01
1102	45660LL56	Customer Buy	12/05/06		99.750	15,000	4.90%	698.44	3.95%		0.95%	135.01
1103	45660LL56	Customer Buy	12/05/06		99.750	35,000	4.90%	1,629.69	3.95%		0.95%	315.02
1104	45660LL56	Customer Buy	12/05/06		99.750	20,000	4.90%	931.25	3.95%		0.95%	180.01
1105	45660LL56	Customer Buy	12/05/06		99.750	13,000	4.90%	605.31	3.95%		0.95%	117.01
1106	93934FEZ1	DLA Buy	12/06/06	94.750		231,900	6.07%	460.00	3.50%		2.57%	194.70
1107	93934FEZ1	Customer Buy	12/07/06		100.500	8,000	6.07%	690.00	3.50%		2.57%	292.05

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO In Dollars	Markup Percentage	Markup in Dollars	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage	Excess Markup Percentage			
1108	93934FEZ1	Customer Buy	12/07/06		100.500	10,000	6.07%	575.00	3.50%	2.57%			243.37
1109	93934FEZ1	Customer Buy	12/07/06		99.500	50,000	5.01%	2,375.00	3.50%	1.51%			716.88
1110	93934FEZ1	Customer Buy	12/07/06		99.500	25,000	5.01%	1,187.50	3.50%	1.51%			358.44
1111	93934FEZ1	Customer Buy	12/07/06		100.500	10,000	6.07%	575.00	3.50%	2.57%			243.37
1112	93934FEZ1	Customer Buy	12/07/06		99.500	10,000	5.01%	475.00	3.50%	1.51%			143.38
1113	93934FER9	DLA Buy	12/07/06	91.250		12,000							
	93934FER9	Customer Buy	12/08/06		98.000	12,000	7.40%	810.00	3.95%	3.45%			377.48
1114	12667GAE3	DLA Buy	12/12/06	93.000		391,000							
1115	12667GAE3	Customer Buy	12/13/06		98.750	18,000	6.18%	1,035.00	3.95%	2.23%			373.77
1116	12667GAE3	Customer Buy	12/13/06		98.750	11,000	6.18%	632.50	3.95%	2.23%			228.42
	12667GAE3	Customer Buy	12/13/06		98.750	30,000	6.18%	1,725.00	3.95%	2.23%			622.95
1117	225458KH0	DLA Buy	12/12/06	92.031		39,000							
	225458KH0	Customer Buy	12/13/06		97.500	15,000	5.94%	820.31	3.95%	1.99%			275.03
1118	31396FGL1	DLA Buy	12/12/06	94.250		30,000							
	31396FGL1	Customer Buy	12/12/06		100.750	23,000	6.90%	1,495.00	3.95%	2.95%			638.75
1119	126694MNS	DLA Buy	12/13/06	93.750		60,000							
1120	126694MNS	Customer Buy	12/14/06		98.125	25,000	4.67%	1,093.75	3.95%	0.72%			167.98
1121	126694MNS	Customer Buy	12/14/06		98.125	15,000	4.67%	656.25	3.95%	0.72%			100.79
	126694MNS	Customer Buy	12/14/06		97.625	20,000	4.13%	775.00	3.95%	0.18%			34.37
1122	31395VXZ7	DLA Buy	12/28/06	96.406		2,000,000							
	31395VXZ7	Customer Buy	12/28/06		100.875	58,000	4.64%	2,591.88	3.75%	0.89%			495.02
1123	05949AEV8	DLA Buy	01/04/07	94.844		100,000							
	05949AEV8	Customer Buy	01/05/07		99.500	100,000	4.91%	4,656.25	3.75%	1.16%			1,099.62
1124	12667GVD2	DLA Buy	01/04/07	93.000		180,000							
	12667GVD2	Customer Buy	01/05/07		97.625	180,000	4.97%	8,325.00	3.95%	1.02%			1,712.67
1125	74958EAP1	DLA Buy	01/05/07	95.563		2,409,000							
	74958EAP1	Customer Buy	01/05/07		100.250	20,000	4.91%	937.50	3.95%	0.96%			182.56
1126	02149CBL4	DLA Buy	01/08/07	98.000		300,000							
	02149CBL4	Customer Buy	01/09/07		102.000	45,000	4.08%	1,800.00	3.95%	0.13%			58.04
1127	02149CBL4	Customer Buy	01/09/07		102.000	15,000	4.08%	600.00	3.95%	0.13%			19.35
1128	02149CBL4	Customer Buy	01/09/07		102.000	32,000	4.08%	1,280.00	3.95%	0.13%			41.27

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1129	61748HRT0	DLA Buy	01/10/07	95.625		30,000						
1130	61748HRT0	Customer Buy	01/11/07		101.000	10,000	5.62%	537.50	3.00%		2.62%	250.62
		Customer Buy	01/11/07		101.000	20,000	5.62%	1,075.00	3.00%		2.62%	501.25
1131	05948X3X7	DLA Buy	01/16/07	92.781		50,000						
1132	05948X3X7	Customer Buy	01/17/07		99.125	15,000	6.84%	951.56	3.00%		3.84%	534.04
1133	05948X3X7	Customer Buy	01/17/07		99.125	10,000	6.84%	634.38	3.00%		3.84%	356.03
		Customer Buy	01/17/07		99.125	25,000	6.84%	1,585.94	3.00%		3.84%	890.07
1134	05948XWW7	DLA Buy	01/16/07	92.063		85,000						
1135	05948XWW7	Customer Buy	01/17/07		98.000	10,000	6.45%	593.75	3.00%		3.45%	317.56
1136	05948XWW7	Customer Buy	01/17/07		98.750	20,000	7.26%	1,337.50	3.00%		4.26%	785.13
1137	05948XWW7	Customer Buy	01/17/07		98.750	15,000	7.26%	1,003.13	3.00%		4.26%	588.85
1138	05948XWW7	Customer Buy	01/17/07		98.750	15,000	7.26%	1,003.13	3.00%		4.26%	981.41
		Customer Buy	01/17/07									588.85
1139	31393X4Z7	DLA Buy	01/22/07	95.875		70,000						
1140	31393X4Z7	Customer Buy	01/23/07		100.625	45,000	4.95%	2,137.50	3.95%		1.00%	433.34
		Customer Buy	01/23/07			25,000	4.95%	1,187.50	3.95%		1.00%	240.74
1141	31394KUQ5	DLA Buy	01/22/07	94.875		65,000						
1142	31394KUQ5	Customer Buy	01/23/07		99.875	25,000	5.27%	1,250.00	3.95%		1.32%	313.11
		Customer Buy	01/23/07		99.875	40,000	5.27%	2,000.00	3.95%		1.32%	500.98
1143	31394PBJ1	DLA Buy	01/22/07	94.750		60,000						
1144	31394PBJ1	Customer Buy	01/23/07		99.875	15,000	5.41%	768.75	3.95%		1.46%	207.36
		Customer Buy	01/23/07		99.875	15,000	5.41%	768.75	3.95%		1.46%	207.36
1145	751155AC6	DLA Buy	01/30/07	96.406		1,500,000						
1146	751155AC6	Customer Buy	01/30/07		100.875	25,000	4.64%	1,117.19	3.95%		0.69%	165.17
1147	751155AC6	Customer Buy	01/30/07		100.875	20,000	4.64%	893.75	3.95%		0.69%	132.13
1148	751155AC6	Customer Buy	01/30/07		100.875	10,000	4.64%	446.88	3.95%		0.69%	66.07
1149	751155AC6	Customer Buy	01/30/07		100.875	100,000	4.64%	4,468.75	3.95%		0.69%	660.67
1150	751155AC6	Customer Buy	01/30/07		100.875	50,000	4.64%	2,234.38	3.95%		0.69%	330.34
1151	751155AC6	Customer Buy	01/30/07		100.875	40,000	4.64%	1,787.50	3.95%		0.69%	264.27
1152	751155AC6	Customer Buy	01/30/07		100.875	20,000	4.64%	893.75	3.95%		0.69%	132.13
1153	751155AC6	Customer Buy	01/30/07		100.875	10,000	4.64%	446.88	3.95%		0.69%	66.07
1154	751155AC6	Customer Buy	01/30/07		100.875	10,000	4.64%	446.88	3.95%		0.69%	66.07
1155	751155AC6	Customer Buy	01/30/07		100.875	12,000	4.64%	536.25	3.95%		0.69%	79.28
1156	751155AC6	Customer Buy	01/30/07		100.875	20,000	4.64%	893.75	3.95%		0.69%	132.13

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1157	751155AC6	Customer Buy	01/30/07		100.875	20,000	4.64%	893.75	3.95%	0.69%		132.13
1158	751155AC6	Customer Buy	01/30/07		100.875	10,000	4.64%	446.88	3.95%	0.69%		66.07
1159	751155AC6	Customer Buy	01/30/07		100.875	12,000	4.64%	536.25	3.95%	0.69%		79.28
1160	751155AC6	Customer Buy	01/30/07		100.875	10,000	4.64%	446.88	3.95%	0.69%		66.07
1161	751155AC6	Customer Buy	01/30/07		100.875	15,000	4.64%	670.31	3.95%	0.69%		99.10
1162	751155AC6	Customer Buy	01/30/07		100.875	30,000	4.64%	1,340.63	3.95%	0.69%		198.20
1163	751155AC6	Customer Buy	01/30/07		100.875	20,000	4.64%	893.75	3.95%	0.69%		132.13
1164	751155AC6	Customer Buy	01/30/07		100.875	15,000	4.64%	670.31	3.95%	0.69%		99.10
1165	751155AC6	Customer Buy	01/30/07		100.875	30,000	4.64%	1,340.63	3.95%	0.69%		198.20
1166	751155AC6	Customer Buy	01/30/07		100.875	10,000	4.64%	446.88	3.95%	0.69%		66.07
1167	751155AC6	Customer Buy	01/30/07		100.875	25,000	4.64%	1,117.19	3.95%	0.69%		165.17
1168	751155AC6	Customer Buy	01/31/07		100.875	19,000	4.64%	849.06	3.95%	0.69%		125.53
1169	751155AC6	Customer Buy	01/31/07		100.875	10,000	4.64%	446.88	3.95%	0.69%		66.07
1170	751155AC6	Customer Buy	01/31/07		101.000	10,000	4.77%	459.38	3.95%	0.82%		78.57
1171	751155AC6	Customer Buy	01/31/07		101.000	10,000	4.77%	459.38	3.95%	0.82%		78.57
1172	751155AC6	Customer Buy	01/31/07		101.125	20,000	4.88%	943.75	3.95%	0.94%		182.15
1173	751155AC6	Customer Buy	01/31/07		101.100	10,000	4.87%	469.38	3.95%	0.92%		88.57
1174	05946XU43	DLA Buy	01/31/07	91.500		17,000	6.83%	562.50	3.95%	2.88%		237.22
	05946XU43	Customer Buy	01/31/07		97.750	9,000						
1175	05949QAN5	DLA Buy	02/12/07	91.250		100,000	6.44%	1,175.00	3.75%	2.69%		490.63
	05949QAN5	Customer Buy	02/13/07		97.125	20,000						
1176	12566TAB3	DLA Buy	02/12/07	92.750		2,000,000	4.31%	2,480.00	3.00%	1.31%		754.87
1177	12566TAB3	Customer Buy	02/13/07		96.750	62,000	4.31%	1,200.00	3.00%	1.31%		365.26
1178	12566TAB3	Customer Buy	02/13/07		96.750	30,000	4.31%	3,200.00	3.00%	1.31%		974.02
1179	12566TAB3	Customer Buy	02/13/07		96.750	80,000	4.31%	1,800.00	3.00%	1.31%		547.89
1180	12566TAB3	Customer Buy	02/13/07		96.750	45,000	4.31%	1,000.00	3.00%	1.31%		304.38
1181	12566TAB3	Customer Buy	02/13/07		96.750	25,000	4.31%	600.00	3.00%	1.31%		182.63
1182	12566TAB3	Customer Buy	02/13/07		96.750	15,000	4.31%	960.00	3.00%	1.31%		292.21
1183	12566TAB3	Customer Buy	02/13/07		96.750	24,000	4.31%	1,200.00	3.00%	1.31%		365.26
1184	126694HG6	DLA Buy	02/14/07	89.750		30,000	7.66%	1,925.00	3.75%	3.91%		982.63
	126694HG6	Customer Buy	02/15/07		96.625	28,000						
1185	12668AGC3	DLA Buy	03/06/07	92.125		18,000	7.19%	1,192.50	3.75%	3.44%		570.65
	12668AGC3	Customer Buy	03/07/07		98.750	18,000						
	05946XEK5	DLA Buy	03/08/07	95.125		35,000						

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Percentage			
1186	05946XEXK5	Customer Buy	03/09/07		99.875	10,000	4.99%	475.00	3.00%		1.99%	189.62
1187	05946XEXK5	Customer Buy	03/09/07		99.875	25,000	4.99%	1,187.50	3.00%		1.99%	474.06
	05946XNV5	DLA Buy	03/08/07	95.375		20,000						
1188	05946XNV5	Customer Buy	03/09/07		99.875	20,000	4.72%	900.00	3.00%		1.72%	327.75
	05948XHIG9	DLA Buy	03/08/07	94.750		31,000						
1189	05948XHIG9	Customer Buy	03/09/07		99.875	31,000	5.41%	1,588.75	3.95%		1.46%	428.54
	05949AEV8	DLA Buy	03/08/07	95.000		60,000						
1190	05949AEV8	Customer Buy	03/09/07		99.625	45,000	4.87%	2,081.25	3.50%		1.37%	584.99
1191	05949AEV8	Customer Buy	03/09/07		99.500	15,000	4.74%	675.00	3.50%		1.24%	176.24
	05949ANX4	DLA Buy	03/08/07	95.781		15,000						
1192	05949ANX4	Customer Buy	03/09/07		100.800	15,000	5.24%	752.81	3.75%		1.49%	214.04
	12668AFM2	DLA Buy	03/08/07	94.500		60,000						
1193	12668AFM2	Customer Buy	03/09/07		99.250	60,000	5.03%	2,841.34	3.75%		1.28%	723.78
	172973H44	DLA Buy	03/08/07	93.375		14,000						
1194	172973H44	Customer Buy	03/09/07		98.250	14,000	5.22%	682.50	3.95%		1.27%	166.14
	172973UB3	DLA Buy	03/08/07	93.375		25,000						
1195	172973UB3	Customer Buy	03/09/07		98.375	25,000	5.35%	1,250.00	3.00%		2.35%	549.70
	57643MJD7	DLA Buy	03/08/07	93.625		15,000						
1196	57643MJD7	Customer Buy	03/09/07		98.625	15,000	5.34%	750.00	3.50%		1.84%	258.48
	929227H90	DLA Buy	03/08/07	92.875		750,000						
1197	929227H90	Customer Buy	03/08/07		97.625	35,000	5.11%	1,662.50	3.95%		1.16%	378.50
1198	929227H90	Customer Buy	03/09/07		97.625	100,000	5.11%	4,750.00	3.95%		1.16%	1,081.44
1199	929227H90	Customer Buy	03/09/07		97.675	26,000	5.17%	1,248.00	3.95%		1.22%	294.16
	949814AM9	DLA Buy	03/08/07	93.500		37,000						
1200	949814AM9	Customer Buy	03/09/07		98.375	23,000	5.21%	1,121.25	3.95%		1.26%	271.80
	12544AAQ8	DLA Buy	03/13/07	96.500		235,500						
1201	12544AAQ8	Customer Buy	03/13/07		101.250	14,000	4.92%	665.00	3.95%		0.97%	131.36
	94982JAG8	DLA Buy	03/13/07	95.500		141,000						
1202	94982JAG8	Customer Buy	03/13/07		100.000	10,000	4.71%	450.00	3.95%		0.76%	72.77

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			
								Markup in Dollars	Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
1203	94982JAG8	Customer Buy	03/13/07		99.500	25,000	4.19%	1,000.00	3.95%	0.24%	56.94
1204	94982JAG8	Customer Buy	03/13/07		100.000	15,000	4.71%	675.00	3.95%	0.76%	109.16
1205	94982JAG8	Customer Buy	03/14/07		100.000	85,000	4.71%	3,825.00	3.95%	0.76%	618.55
1206	05946XWH2	DLA Buy	03/14/07	95.375		137,000					
1207	05946XWH2	Customer Buy	03/15/07		100.000	20,000	4.85%	925.00	3.95%	0.90%	171.54
1208	05946XWH2	Customer Buy	03/15/07		100.000	20,000	4.85%	925.00	3.95%	0.90%	171.54
1209	126694AC2	DLA Buy	03/19/07	92.000		110,000					
1210	126694AC2	Customer Buy	03/20/07		97.625	25,000	6.11%	1,406.25	3.95%	2.16%	497.74
1211	126694AC2	Customer Buy	03/20/07		97.625	11,000	6.11%	618.75	3.95%	2.16%	219.01
1212	172973M89	DLA Buy	03/19/07	91.000		100,000					
1213	172973M89	Customer Buy	03/20/07		94.875	16,000	4.26%	620.00	3.95%	0.31%	44.87
1214	31394LZ54	DLA Buy	03/19/07	95.250		25,000					
1215	05948XWT4	DLA Buy	03/20/07	92.500		15,000					
1216	05948XWT4	Customer Buy	03/21/07		97.625	17,000	5.54%	871.25	3.95%	1.59%	735.61
1217	05949AAD2	DLA Buy	03/20/07	92.375		30,000					
1218	05949AAD2	Customer Buy	03/21/07		97.750	20,000	5.82%	1,075.00	3.95%	1.87%	345.24
1219	05948XGA3	DLA Buy	03/22/07	93.750		40,000					
1220	86359BH38	DLA Buy	03/22/07	89.750		13,000					
1221	31394GV2	DLA Buy	04/13/07	92.250		15,000					
1222	12638PAZ2	DLA Buy	04/17/07	97.063		675,000					
1223	12638PAZ2	Customer Buy	04/18/07		101.750	50,000	4.83%	2,343.75	3.95%	0.88%	426.79

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup In Dollars
								Markup in Dollars	Markup Percentage			
1223	74162FAB1	DLA Buy	04/18/07	97.563	101.875	500,000	4.42%	690.00	3.75%	0.67%		104.62
1224	74162FAB1	Customer Buy	04/18/07		102,000	16,000	4.55%	443.75	3.75%	0.80%		77.89
1225	74162FAB1	Customer Buy	04/19/07		102,000	10,000	4.55%	665.63	3.75%	0.80%		116.84
1226	74162FAB1	Customer Buy	04/19/07		102,000	15,000	4.55%	2,662.53	3.75%	0.80%		467.37
1227	74162FAB1	Customer Buy	04/19/07		102,000	60,000	4.55%	532.50	3.75%	0.80%		93.47
1228	74162FAB1	Customer Buy	04/19/07		102,000	12,000	4.55%	443.75	3.75%	0.80%		77.89
1229	74162FAB1	Customer Buy	04/19/07		102,000	10,000	4.55%	576.88	3.75%	0.80%		101.26
1230	173107AG8	DLA Buy	04/23/07	96.875	101.750	194,000	5.03%	4,631.25	3.95%	1.08%		996.05
	173107AG8	Customer Buy	04/24/07			95,000						
1231	31394NU89	DLA Buy	04/23/07	94.250	99.125	327,000	5.17%	487.50	3.95%	1.22%		115.21
1232	31394NU89	Customer Buy	04/24/07		99.125	10,000	5.17%	487.50	3.95%	1.22%		115.21
1233	31394NU89	Customer Buy	04/24/07		99.125	27,000	5.17%	1,316.25	3.95%	1.22%		311.07
1234	31394NU89	Customer Buy	04/24/07		99.125	70,000	5.17%	3,412.50	3.95%	1.22%		806.48
1235	31394NU89	Customer Buy	04/24/07		99.125	60,000	5.17%	2,925.00	3.95%	1.22%		691.27
1236	32053NAD0	DLA Buy	04/23/07	96.875	101.750	413,000	5.03%	3,900.00	3.95%	1.08%		838.78
	32053NAD0	Customer Buy	04/24/07			80,000						
1237	05949TAL3	DLA Buy	04/24/07	94.250	99.750	127,000	5.84%	3,575.00	3.95%	1.89%		1,155.10
1238	05949TAL3	Customer Buy	04/24/07		99.750	65,000	5.84%	880.00	3.95%	1.89%		284.33
1239	05949TAL3	Customer Buy	04/25/07		99.750	16,000	5.84%	1,815.00	3.95%	1.89%		586.44
1240	05949TAL3	Customer Buy	04/25/07		99.750	33,000	5.84%	715.00	3.95%	1.89%		231.02
1241	22942KAF7	DLA Buy	04/24/07	96.750	100.875	130,000	4.26%	5,362.50	3.95%	0.31%		394.43
	22942KAF7	Customer Buy	04/25/07			130,000						
1242	05946XVL4	DLA Buy	04/25/07	91.500	96.750	166,000	5.74%	1,260.00	3.95%	1.79%		392.58
1243	05946XVL4	Customer Buy	04/25/07		96.750	24,000	5.74%	1,312.50	3.95%	1.79%		408.94
1244	05946XVL4	Customer Buy	04/26/07		96.500	25,000	5.46%	500.00	3.95%	1.51%		138.58
1245	05946XVL4	Customer Buy	04/26/07		96.750	10,000	5.74%	1,575.00	3.95%	1.79%		490.72
1246	05946XVL4	Customer Buy	04/26/07		96.750	30,000	5.74%	1,050.00	3.95%	1.79%		327.15
1247	31396CHK9	DLA Buy	04/25/07	94.500	99.500	100,000	5.29%	1,150.00	3.95%	1.34%		291.47
1248	31396CHK9	Customer Buy	04/26/07		99.500	23,000	5.29%	2,800.00	3.95%	1.34%		709.66
	31396CHK9	Customer Buy	04/26/07			56,000						

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup Dollars
								Markup in Dollars	Markup Percentage			
1249	05949AAC4	DLA Buy	04/30/07	91.250	97.625	50,000	6.99%	765.00	3.95%	3.04%		332.47
	05949AAC4	Customer Buy	05/01/07			12,000						
1250	05949AEW6	DLA Buy	05/07/07	90.875	96.750	81,000	6.46%	3,280.00	3.95%	2.51%		1,279.83
	05949AEW6	Customer Buy	05/08/07			56,000						
1251	05949ANX4	DLA Buy	05/07/07	96.500	101.125	128,000	4.79%	3,376.25	3.00%	1.79%		1,262.87
1252	05949ANX4	Customer Buy	05/08/07		101.125	73,000	4.79%	462.50	3.00%	1.79%		173.00
1253	05949ANX4	Customer Buy	05/08/07		100.875	30,000	4.53%	1,312.50	3.00%	1.53%		444.01
1254	12667GTQ6	DLA Buy	05/07/07	92.500	97.000	110,000	4.86%	2,250.00	3.95%	0.91%		423.14
1255	12667GTQ6	Customer Buy	05/08/07		97.000	50,000	4.86%	2,700.00	3.95%	0.91%		507.77
1256	05949AEV8	DLA Buy	05/08/07	94.000	98.750	114,000	5.05%	855.00	3.50%	1.55%		262.80
1257	05949AEV8	Customer Buy	05/09/07		98.750	18,000	5.05%	950.00	3.50%	1.55%		292.00
1258	05949AEV8	Customer Buy	05/09/07		98.750	20,000	5.05%	807.50	3.50%	1.55%		248.20
1259	126694DF2	DLA Buy	05/09/07	92.000	97.875	140,000	6.39%	587.50	3.75%	2.64%		242.50
	126694DF2	Customer Buy	05/10/07			10,000						
1260	76111XZY2	DLA Buy	05/09/07	92.500	99.375	25,000	7.43%	687.50	3.50%	3.93%		363.75
	76111XZY2	Customer Buy	05/09/07			10,000						
1261	74162FAB1	DLA Buy	05/14/07	97.500	102.000	1,105,000	4.62%	900.00	3.75%	0.87%		168.75
1262	74162FAB1	Customer Buy	05/15/07		102.000	20,000	4.62%	765.00	3.75%	0.87%		143.44
1263	74162FAB1	Customer Buy	05/15/07		102.000	17,000	4.62%	1,575.00	3.75%	0.87%		295.32
1264	74162FAB1	Customer Buy	05/15/07		102.000	35,000	4.62%	1,800.00	3.75%	0.87%		337.51
1265	74162FAB1	Customer Buy	05/15/07		102.000	40,000	4.62%	1,800.00	3.75%	0.87%		337.51
1266	74162FAB1	Customer Buy	05/15/07		101.500	40,000	4.10%	1,200.00	3.75%	0.35%		103.14
1267	74162FAB1	Customer Buy	05/15/07		101.500	30,000	4.10%	1,800.00	3.75%	0.35%		154.70
1268	74162FAB1	Customer Buy	05/15/07		102.000	45,000	4.62%	450.00	3.75%	0.87%		84.38
1269	74162FAB1	Customer Buy	05/15/07		102.000	10,000	4.62%	900.00	3.75%	0.87%		168.75
1270	74162FAB1	Customer Buy	05/15/07		102.000	20,000	4.62%	1,800.00	3.75%	0.87%		337.51
1271	74162FAB1	Customer Buy	05/15/07		102.000	40,000	4.62%	450.00	3.75%	0.87%		84.38
1272	74162FAB1	Customer Buy	05/15/07		102.000	10,000	4.62%	900.00	3.75%	0.87%		168.75
1273	74162FAB1	Customer Buy	05/15/07		102.000	20,000	4.62%	1,125.00	3.75%	0.87%		210.94
1274	74162FAB1	Customer Buy	05/15/07		102.000	25,000	4.62%	900.00	3.75%	0.87%		168.75
	74162FAB1	Customer Buy	05/15/07		102.000	20,000	4.62%	900.00	3.75%	0.87%		168.75

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1275	74162FAB1	Customer Buy	05/15/07		102.000	10,000	4.62%	450.00	3.75%		0.87%	84.38
1276	74162FAB1	Customer Buy	05/15/07		102.000	20,000	4.62%	900.00	3.75%		0.87%	168.75
1277	74162FAB1	Customer Buy	05/15/07		102.000	15,000	4.62%	675.00	3.75%		0.87%	126.56
1278	74162FAB1	Customer Buy	05/15/07		102.000	10,000	4.62%	450.00	3.75%		0.87%	84.38
1279	74162FAB1	Customer Buy	05/15/07		102.000	10,000	4.62%	450.00	3.75%		0.87%	84.38
1280	74162FAB1	Customer Buy	05/15/07		102.000	20,000	4.62%	900.00	3.75%		0.87%	168.75
1281	74162FAB1	Customer Buy	05/15/07		102.000	75,000	4.62%	3,375.00	3.75%		0.87%	632.82
1282	74162FAB1	Customer Buy	05/15/07		102.000	45,000	4.62%	2,025.00	3.75%		0.87%	379.69
1283	74162FAB1	Customer Buy	05/15/07		102.050	50,000	4.67%	2,275.00	3.75%		0.92%	446.89
1284	12669FRL9	DLA Buy	05/16/07	90.063		57,000						
	12669FRL9	Customer Buy	05/17/07		94.500	13,000	4.93%	576.88	3.95%		0.98%	114.40
1285	23246KAD3	DLA Buy	05/21/07	96.656		3,500,000						
	23246KAD3	Customer Buy	05/21/07		101.500	55,000	5.01%	2,664.06	3.75%		1.26%	670.52
1286	23246KAD3	Customer Buy	05/22/07		101.375	59,000	4.88%	2,784.06	3.75%		1.13%	645.55
1287	23246KAD3	Customer Buy	05/22/07		101.375	100,000	4.88%	4,718.75	3.75%		1.13%	1,094.15
1288	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%		1.13%	109.41
1289	23246KAD3	Customer Buy	05/22/07		101.375	30,000	4.88%	1,415.63	3.75%		1.13%	328.24
1290	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%		1.13%	218.83
1291	23246KAD3	Customer Buy	05/22/07		101.375	83,000	4.88%	3,916.56	3.75%		1.13%	908.14
1292	23246KAD3	Customer Buy	05/22/07		101.375	22,000	4.88%	1,038.13	3.75%		1.13%	240.71
1293	23246KAD3	Customer Buy	05/22/07		101.375	77,000	4.88%	3,633.44	3.75%		1.13%	842.49
1294	23246KAD3	Customer Buy	05/22/07		101.375	55,000	4.88%	2,595.31	3.75%		1.13%	601.78
1295	23246KAD3	Customer Buy	05/22/07		101.000	15,000	4.49%	651.56	3.75%		0.74%	107.87
1296	23246KAD3	Customer Buy	05/22/07		101.375	15,000	4.88%	707.81	3.75%		1.13%	164.12
1297	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%		1.13%	109.41
1298	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%		1.13%	218.83
1299	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%		1.13%	109.41
1300	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%		1.13%	218.83
1301	23246KAD3	Customer Buy	05/22/07		101.375	18,000	4.88%	849.38	3.75%		1.13%	196.95
1302	23246KAD3	Customer Buy	05/22/07		101.375	15,000	4.88%	707.81	3.75%		1.13%	164.12
1303	23246KAD3	Customer Buy	05/22/07		101.375	25,000	4.88%	1,179.69	3.75%		1.13%	273.54
1304	23246KAD3	Customer Buy	05/22/07		101.375	52,000	4.88%	2,453.75	3.75%		1.13%	568.96
1305	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%		1.13%	218.83
1306	23246KAD3	Customer Buy	05/22/07		101.375	40,000	4.88%	1,887.50	3.75%		1.13%	437.66
1307	23246KAD3	Customer Buy	05/22/07		101.375	9,000	4.88%	424.69	3.75%		1.13%	98.47
1308	23246KAD3	Customer Buy	05/22/07		101.375	22,000	4.88%	1,038.13	3.75%		1.13%	240.71
1309	23246KAD3	Customer Buy	05/22/07		101.375	75,000	4.88%	3,539.06	3.75%		1.13%	820.61
1310	23246KAD3	Customer Buy	05/22/07		101.375	146,000	4.88%	6,889.38	3.75%		1.13%	1,597.45
1311	23246KAD3	Customer Buy	05/22/07		101.375	120,000	4.88%	5,662.50	3.75%		1.13%	1,312.98

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO In Dollars	Markup Percentage	Expert's Max		Excess Markup Percentage	Excess Markup In Dollars
								Markup In Dollars	Markup Percentage		
1312	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%	1.13%	218.83
1313	23246KAD3	Customer Buy	05/22/07		101.375	25,000	4.88%	1,179.69	3.75%	1.13%	273.54
1314	23246KAD3	Customer Buy	05/22/07		101.375	28,000	4.88%	1,321.25	3.75%	1.13%	306.36
1315	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%	109.41
1316	23246KAD3	Customer Buy	05/22/07		101.375	41,000	4.88%	1,934.69	3.75%	1.13%	448.60
1317	23246KAD3	Customer Buy	05/22/07		101.375	24,000	4.88%	1,132.50	3.75%	1.13%	262.60
1318	23246KAD3	Customer Buy	05/22/07		101.375	50,000	4.88%	2,359.38	3.75%	1.13%	547.07
1319	23246KAD3	Customer Buy	05/22/07		101.375	88,000	4.88%	4,152.50	3.75%	1.13%	962.85
1320	23246KAD3	Customer Buy	05/22/07		101.375	50,000	4.88%	2,359.38	3.75%	1.13%	547.07
1321	23246KAD3	Customer Buy	05/22/07		101.375	92,000	4.88%	4,341.25	3.75%	1.13%	1,006.61
1322	23246KAD3	Customer Buy	05/22/07		101.375	18,000	4.88%	849.38	3.75%	1.13%	196.95
1323	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%	109.41
1324	23246KAD3	Customer Buy	05/22/07		101.375	30,000	4.88%	1,415.63	3.75%	1.13%	328.24
1325	23246KAD3	Customer Buy	05/22/07		101.375	475,000	4.88%	22,414.06	3.75%	1.13%	5,197.19
1326	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%	109.41
1327	23246KAD3	Customer Buy	05/22/07		101.375	100,000	4.88%	4,718.75	3.75%	1.13%	1,094.15
1328	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%	1.13%	218.83
1329	23246KAD3	Customer Buy	05/22/07		101.375	16,000	4.88%	755.00	3.75%	1.13%	175.06
1330	23246KAD3	Customer Buy	05/22/07		101.375	15,000	4.88%	707.81	3.75%	1.13%	164.12
1331	23246KAD3	Customer Buy	05/22/07		101.375	30,000	4.88%	1,415.63	3.75%	1.13%	328.24
1332	23246KAD3	Customer Buy	05/22/07		101.375	15,000	4.88%	707.81	3.75%	1.13%	164.12
1333	23246KAD3	Customer Buy	05/22/07		101.375	45,000	4.88%	2,123.44	3.75%	1.13%	492.37
1334	23246KAD3	Customer Buy	05/22/07		101.375	30,000	4.88%	1,415.63	3.75%	1.13%	328.24
1335	23246KAD3	Customer Buy	05/22/07		101.375	12,000	4.88%	566.25	3.75%	1.13%	131.30
1336	23246KAD3	Customer Buy	05/22/07		101.375	13,000	4.88%	613.44	3.75%	1.13%	142.24
1337	23246KAD3	Customer Buy	05/22/07		101.375	17,000	4.88%	802.19	3.75%	1.13%	186.00
1338	23246KAD3	Customer Buy	05/22/07		101.375	30,000	4.88%	1,415.63	3.75%	1.13%	328.24
1339	23246KAD3	Customer Buy	05/22/07		101.375	25,000	4.88%	1,179.69	3.75%	1.13%	273.54
1340	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%	109.41
1341	23246KAD3	Customer Buy	05/22/07		101.375	40,000	4.88%	1,887.50	3.75%	1.13%	437.66
1342	23246KAD3	Customer Buy	05/22/07		101.375	100,000	4.88%	4,718.75	3.75%	1.13%	1,094.15
1343	23246KAD3	Customer Buy	05/22/07		101.375	109,000	4.88%	5,143.44	3.75%	1.13%	1,192.62
1344	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%	109.41
1345	23246KAD3	Customer Buy	05/22/07		101.375	25,000	4.88%	1,179.69	3.75%	1.13%	273.54
1346	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%	1.13%	218.83
1347	23246KAD3	Customer Buy	05/22/07		101.375	228,000	4.88%	10,758.75	3.75%	1.13%	2,494.65
1348	23246KAD3	Customer Buy	05/22/07		101.375	50,000	4.88%	2,359.38	3.75%	1.13%	547.07
1349	23246KAD3	Customer Buy	05/22/07		101.375	45,000	4.88%	2,123.44	3.75%	1.13%	492.37
1350	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%	109.41
1351	23246KAD3	Customer Buy	05/22/07		101.375	12,000	4.88%	566.25	3.75%	1.13%	131.30
1352	23246KAD3	Customer Buy	05/22/07		101.375	50,000	4.88%	2,359.38	3.75%	1.13%	547.07

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1353	23246KAD3	Customer Buy	05/22/07	97.188	101.375	20,000	4.88%	943.75	3.75%	1.13%		218.83
1354	23246KAD3	Customer Buy	05/22/07		101.375	25,000	4.88%	1,179.69	3.75%	1.13%		273.54
1355	23246KAD3	Customer Buy	05/22/07		101.375	225,000	4.88%	10,617.19	3.75%	1.13%		2,461.83
1356	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%		109.41
1357	23246KAD3	Customer Buy	05/22/07		101.375	67,000	4.88%	3,161.56	3.75%	1.13%		733.08
1358	23246KAD3	Customer Buy	05/22/07		101.375	25,000	4.88%	1,179.69	3.75%	1.13%		273.54
1359	23246KAD3	Customer Buy	05/22/07		101.375	33,000	4.88%	1,557.19	3.75%	1.13%		361.07
1360	23246KAD3	Customer Buy	05/22/07		101.375	14,000	4.88%	660.63	3.75%	1.13%		153.18
1361	23246KAD3	Customer Buy	05/22/07		101.375	30,000	4.88%	1,415.63	3.75%	1.13%		328.24
1362	23246KAD3	Customer Buy	05/22/07		101.375	40,000	4.88%	1,887.50	3.75%	1.13%		437.66
1363	23246KAD3	Customer Buy	05/22/07		101.375	29,000	4.88%	1,368.44	3.75%	1.13%		317.30
1364	23246KAD3	Customer Buy	05/22/07		101.000	25,000	4.49%	1,085.94	3.75%	0.74%		179.78
1365	23246KAD3	Customer Buy	05/22/07		101.000	15,000	4.49%	651.56	3.75%	0.74%		107.87
1366	23246KAD3	Customer Buy	05/22/07		101.375	20,000	4.88%	943.75	3.75%	1.13%		218.83
1367	23246KAD3	Customer Buy	05/22/07		101.375	34,000	4.88%	1,604.38	3.75%	1.13%		372.01
1368	23246KAD3	Customer Buy	05/22/07		101.375	53,000	4.88%	2,500.94	3.75%	1.13%		579.90
1369	23246KAD3	Customer Buy	05/22/07		101.375	15,000	4.88%	707.81	3.75%	1.13%		164.12
1370	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%		109.41
1371	23246KAD3	Customer Buy	05/22/07		101.375	10,000	4.88%	471.88	3.75%	1.13%		109.41
1372	23246KAD3	Customer Buy	05/22/07		101.375	23,000	4.88%	1,085.31	3.75%	1.13%		251.65
1373	23246KAD3	Customer Buy	05/22/07		101.375	50,000	4.88%	2,359.38	3.75%	1.13%		547.07
1374	23246KAD3	Customer Buy	05/22/07		101.375	30,000	4.88%	1,415.63	3.75%	1.13%		328.24
1375	23246KAD3	Customer Buy	05/22/07		101.000	18,000	4.49%	781.88	3.75%	0.74%		129.44
1376	23246KAD3	Customer Buy	05/22/07		101.375	40,000	4.88%	1,887.50	3.75%	1.13%		437.66
1377	23246KAD3	Customer Buy	05/22/07		101.375	38,000	4.88%	1,793.13	3.75%	1.13%		415.78
1378	74958YAC6	DLA Buy	05/21/07	97.188	101.625	1,100,000	4.57%	1,331.25	3.50%	1.07%		310.78
1379	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		517.96
1380	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		258.98
1381	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		1,201.68
1382	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		258.98
1383	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		113.95
1384	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		207.19
1385	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		103.59
1386	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		103.59
1387	74958YAC6	Customer Buy	05/22/07				4.57%		3.50%	1.07%		414.37
1388	74958YAC6	Customer Buy	05/22/07		101.625	40,000	4.57%	1,775.00	3.50%	1.07%		113.95
1389	74958YAC6	Customer Buy	05/22/07		101.625	11,000	4.57%	488.13	3.50%	1.07%		258.98
1390	74958YAC6	Customer Buy	05/22/07		101.625	25,000	4.57%	1,109.38	3.50%	1.07%		103.59
1391	74958YAC6	Customer Buy	05/22/07		101.625	10,000	4.57%	443.75	3.50%	1.07%		258.98
						25,000	4.57%	1,109.38	3.50%	1.07%		

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup in Dollars	Expert's Max		Excess Markup Percentage	Excess Markup in Dollars
									Markup Percentage			
1392	74958YAC6	Customer Buy	05/22/07		101.625	150,000	4.57%	6,656.25	3.50%	1.07%		1,553.89
1393	74958YAC6	Customer Buy	05/22/07		101.625	16,000	4.57%	710.00	3.50%	1.07%		165.75
1394	74958YAC6	Customer Buy	05/22/07		101.625	10,000	4.57%	443.75	3.50%	1.07%		103.59
1395	225470UT8	DLA Buy	05/22/07	96.000		115,000						
1396	225470UT8	Customer Buy	05/23/07		100.500	58,000	4.69%	2,610.00	3.00%	1.69%		939.60
1397	225470UT8	Customer Buy	05/23/07		100.500	20,000	4.69%	900.00	3.00%	1.69%		324.00
1398	23246KAD3	DLA Buy	05/22/07	96.656		2,371,000						
1399	23246KAD3	Customer Buy	05/23/07		101.000	30,000	4.49%	1,303.13	3.75%	0.74%		215.74
1400	23246KAD3	Customer Buy	05/23/07		101.375	18,000	4.88%	849.38	3.75%	1.13%		196.95
1401	23246KAD3	Customer Buy	05/23/07		101.375	10,000	4.88%	471.88	3.75%	1.13%		109.41
1402	23246KAD3	Customer Buy	05/23/07		101.000	30,000	4.49%	1,303.13	3.75%	0.74%		215.74
1403	23246KAD3	Customer Buy	05/23/07		101.375	25,000	4.88%	1,179.69	3.75%	1.13%		273.54
1404	23246KAD3	Customer Buy	05/23/07		101.375	10,000	4.88%	471.88	3.75%	1.13%		109.41
1405	23246KAD3	Customer Buy	05/23/07		101.375	38,000	4.88%	1,793.13	3.75%	1.13%		415.78
1406	23246KAD3	Customer Buy	05/23/07		101.000	30,000	4.49%	1,303.13	3.75%	0.74%		215.74
1407	23246KAD3	Customer Buy	05/23/07		101.375	37,000	4.88%	1,745.94	3.75%	1.13%		404.83
1408	23246KAD3	Customer Buy	05/23/07		101.375	30,000	4.88%	1,415.63	3.75%	1.13%		328.24
1409	31393WFZ7	DLA Buy	05/22/07	90.000		50,000						
	31393WFZ7	Customer Buy	05/23/07		95.250	40,000	5.83%	2,100.00	3.95%	1.88%		677.99
1410	05948XQF1	DLA Buy	05/29/07	90.375		100,000						
1411	05948XQF1	Customer Buy	05/30/07		96.500	10,000	6.78%	612.50	3.75%	3.03%		273.59
1412	05948XQF1	Customer Buy	05/30/07		96.500	20,000	6.78%	1,225.00	3.75%	3.03%		547.18
1413	05948XQF1	Customer Buy	05/30/07		96.500	10,000	6.78%	612.50	3.75%	3.03%		273.59
1414	05948XQF1	Customer Buy	05/30/07		96.500	20,000	6.78%	1,225.00	3.75%	3.03%		547.18
1415	05948XQF1	Customer Buy	05/30/07		96.500	20,000	6.78%	1,225.00	3.75%	3.03%		547.18
1416	126694DGO	DLA Buy	05/29/07	91.000		200,000						
1417	126694DGO	Customer Buy	05/30/07		95.750	30,000	5.22%	1,425.00	3.95%	1.27%		346.66
1418	126694DGO	Customer Buy	05/30/07		95.750	25,000	5.22%	1,187.50	3.95%	1.27%		288.88
	126694DGO	Customer Buy	05/30/07		95.000	110,000	4.40%	4,400.00	3.95%	0.45%		446.05
1419	05946XQAA	DLA Buy	05/30/07	90.750		211,000						
1420	05946XQAA	Customer Buy	05/31/07		95.125	72,000	4.82%	3,150.00	3.95%	0.87%		569.05
	05946XQAA	Customer Buy	05/31/07		95.375	14,000	5.10%	647.50	3.95%	1.15%		145.65

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1421	05946XQA4	Customer Buy	05/31/07		95.375	20,000	5.10%	925.00	3.95%		1.15%	208.07
1422	05946XQA4	Customer Buy	05/31/07		95.375	40,000	5.10%	1,850.00	3.95%		1.15%	416.14
1423	05946XQA4	Customer Buy	05/31/07		95.375	12,000	5.10%	555.00	3.95%		1.15%	124.84
1424	05946XQA4	Customer Buy	05/31/07		95.375	25,000	5.10%	1,156.25	3.95%		1.15%	260.09
1425	94985JBFO	DLA Buy	05/30/07	95.813		1,627,000						
1425	94985JBFO	Customer Buy	05/31/07		100.625	15,000	5.02%	721.88	3.95%		1.07%	154.18
1426	94985JBFO	Customer Buy	05/31/07		100.625	50,000	5.02%	2,406.25	3.95%		1.07%	513.94
1427	16162WFG9	DLA Buy	06/04/07	92.750		50,000						
1427	16162WFG9	Customer Buy	06/05/07		99.125	10,000	6.87%	637.50	3.00%		3.87%	359.25
1428	749580AH9	DLA Buy	06/05/07	95.188		2,500,000						
1428	749580AH9	Customer Buy	06/05/07		99.875	25,000	4.92%	1,171.88	3.95%		0.97%	231.90
1429	749580AH9	Customer Buy	06/05/07		99.875	20,000	4.92%	937.50	3.95%		0.97%	185.52
1430	749580AH9	Customer Buy	06/06/07		99.875	55,000	4.92%	2,578.13	3.95%		0.97%	510.18
1431	749580AH9	Customer Buy	06/06/07		99.875	15,000	4.92%	703.13	3.95%		0.97%	139.14
1432	749580AH9	Customer Buy	06/06/07		99.875	50,000	4.92%	2,343.75	3.95%		0.97%	463.80
1433	749580AH9	Customer Buy	06/06/07		99.875	25,000	4.92%	1,171.88	3.95%		0.97%	231.90
1434	749580AH9	Customer Buy	06/06/07		99.875	30,000	4.92%	1,406.25	3.95%		0.97%	278.28
1435	749580AH9	Customer Buy	06/06/07		99.875	10,000	4.92%	488.75	3.95%		0.97%	92.76
1436	749580AH9	Customer Buy	06/06/07		99.875	15,000	4.92%	703.13	3.95%		0.97%	139.14
1437	749580AH9	Customer Buy	06/06/07		99.875	12,000	4.92%	562.50	3.95%		0.97%	111.31
1438	749580AH9	Customer Buy	06/06/07		99.875	20,000	4.92%	937.50	3.95%		0.97%	185.52
1439	749580AH9	Customer Buy	06/06/07		99.875	25,000	4.92%	1,171.88	3.95%		0.97%	231.90
1440	749580AH9	Customer Buy	06/06/07		99.875	10,000	4.92%	468.75	3.95%		0.97%	92.76
1441	749580AH9	Customer Buy	06/06/07		99.875	15,000	4.92%	703.13	3.95%		0.97%	139.14
1442	749580AH9	Customer Buy	06/06/07		99.875	20,000	4.92%	937.50	3.95%		0.97%	185.52
1443	749580AH9	Customer Buy	06/06/07		99.875	25,000	4.92%	1,171.88	3.95%		0.97%	231.90
1444	749580AH9	Customer Buy	06/06/07		99.875	22,000	4.92%	1,031.25	3.95%		0.97%	204.07
1445	749580AH9	Customer Buy	06/06/07		99.875	50,000	4.92%	2,343.75	3.95%		0.97%	463.80
1446	749580AH9	Customer Buy	06/06/07		99.875	10,000	4.92%	468.75	3.95%		0.97%	92.76
1447	05953YBL4	DLA Buy	06/13/07	93.500		600,000						
1447	05953YBL4	Customer Buy	06/13/07		97.750	79,000	4.55%	3,357.50	3.75%		0.80%	587.60
1448	05953YBL4	Customer Buy	06/13/07		97.625	13,000	4.41%	536.25	3.75%		0.66%	80.44
1449	05953YBL4	Customer Buy	06/13/07		97.750	15,000	4.55%	637.50	3.75%		0.80%	111.57
1450	05953YBL4	Customer Buy	06/13/07		97.750	20,000	4.55%	850.00	3.75%		0.80%	148.76
1451	05953YBL4	Customer Buy	06/13/07		97.750	15,000	4.55%	637.50	3.75%		0.80%	111.57
1452	05953YBL4	Customer Buy	06/13/07		98.000	30,000	4.81%	1,350.00	3.75%		1.06%	298.12
1453	05953YBL4	Customer Buy	06/13/07		97.625	10,000	4.41%	412.50	3.75%		0.66%	61.88

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO In Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup In Dollars
								Markup in Dollars	Markup Percentage			
1454	05953YBL4	Customer Buy	06/13/07		97.625	30,000	4.41%	1,237.50	3.75%		0.66%	185.63
1455	05953YBL4	Customer Buy	06/13/07		97.750	52,000	4.55%	2,210.00	3.75%		0.80%	386.77
1456	05953YBL4	Customer Buy	06/14/07		97.625	50,000	4.41%	2,062.50	3.75%		0.66%	309.39
1457	05953YBL4	Customer Buy	06/14/07		98.000	10,000	4.81%	450.00	3.75%		1.06%	99.37
1458	05953YBL4	Customer Buy	06/14/07		98.000	15,000	4.81%	675.00	3.75%		1.06%	149.06
1459	05953YBL4	Customer Buy	06/14/07		98.000	15,000	4.81%	675.00	3.75%		1.06%	149.06
1460	05953YBL4	Customer Buy	06/14/07		98.000	15,000	4.81%	675.00	3.75%		1.06%	149.06
1461	05953YBL4	Customer Buy	06/14/07		98.000	12,000	4.81%	540.00	3.75%		1.06%	119.25
1462	05953YBL4	Customer Buy	06/14/07		97.875	20,000	4.68%	875.00	3.75%		0.93%	173.74
1463	05953YBL4	Customer Buy	06/14/07		98.000	36,000	4.81%	1,620.00	3.75%		1.06%	357.74
1464	05953YBL4	Customer Buy	06/14/07		98.000	50,000	4.81%	2,250.00	3.75%		1.06%	496.86
1465	05953YBL4	Customer Buy	06/14/07		98.000	10,000	4.81%	450.00	3.75%		1.06%	99.37
1466	05953YBL4	Customer Buy	06/14/07		98.000	33,000	4.81%	1,485.00	3.75%		1.06%	327.93
1467	05953YBL4	Customer Buy	06/14/07		98.000	55,000	4.81%	2,475.00	3.75%		1.06%	546.54
	05953YBL4	DLA Buy	06/18/07	93.813		1,000,000						
1468	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1469	05953YBL4	Customer Buy	06/19/07		98.375	21,000	4.86%	958.13	3.75%		1.11%	219.35
1470	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1471	05953YBL4	Customer Buy	06/19/07		98.375	100,000	4.86%	4,562.50	3.75%		1.11%	1,044.51
1472	05953YBL4	Customer Buy	06/19/07		98.375	25,000	4.86%	1,140.63	3.75%		1.11%	261.13
1473	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1474	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1475	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1476	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1477	05953YBL4	Customer Buy	06/19/07		98.500	10,000	5.00%	468.75	3.75%		1.25%	116.96
1478	05953YBL4	Customer Buy	06/19/07		98.375	25,000	4.86%	1,140.63	3.75%		1.11%	261.13
1479	05953YBL4	Customer Buy	06/19/07		97.875	12,000	4.33%	487.50	3.75%		0.58%	65.34
1480	05953YBL4	Customer Buy	06/19/07		98.375	25,000	4.86%	1,140.63	3.75%		1.11%	261.13
1481	05953YBL4	Customer Buy	06/19/07		98.375	50,000	4.86%	2,281.25	3.75%		1.11%	522.26
1482	05953YBL4	Customer Buy	06/19/07		98.375	20,000	4.86%	912.50	3.75%		1.11%	208.90
1483	05953YBL4	Customer Buy	06/19/07		98.500	12,000	5.00%	562.50	3.75%		1.25%	140.35
1484	05953YBL4	Customer Buy	06/19/07		98.500	10,000	5.00%	468.75	3.75%		1.25%	116.96
1485	05953YBL4	Customer Buy	06/19/07		98.375	19,000	4.86%	866.88	3.75%		1.11%	198.46
1486	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1487	05953YBL4	Customer Buy	06/19/07		98.375	10,000	4.86%	456.25	3.75%		1.11%	104.45
1488	05953YBL4	Customer Buy	06/19/07		98.375	100,000	4.86%	4,562.50	3.75%		1.11%	1,044.51
1489	05953YBL4	Customer Buy	06/19/07		98.375	60,000	4.86%	2,737.50	3.75%		1.11%	626.71
1490	05953YBL4	Customer Buy	06/19/07		98.375	122,000	4.86%	5,566.25	3.75%		1.11%	1,274.31
1491	05953YBL4	Customer Buy	06/19/07		98.500	15,000	5.00%	703.13	3.75%		1.25%	175.44
1492	05953YBL4	Customer Buy	06/19/07		98.375	20,000	4.86%	912.50	3.75%		1.11%	208.90

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup In Dollars
								Markup in Dollars	Markup Percentage			
1493	05953YBL4	Customer Buy	06/19/07		98.375	100,000	4.86%	4,562.50	3.75%		1.11%	1,044.51
1494	05953YBL4	Customer Buy	06/19/07		98.375	25,000	4.86%	1,140.63	3.75%		1.11%	261.13
1495	05953YBL4	Customer Buy	06/19/07		98.375	15,000	4.86%	684.38	3.75%		1.11%	156.68
1496	05953YBL4	Customer Buy	06/19/07		98.500	15,000	5.00%	703.13	3.75%		1.25%	175.44
1497	05953YBL4	Customer Buy	06/19/07		98.375	20,000	4.86%	912.50	3.75%		1.11%	208.90
1498	05953YBL4	Customer Buy	06/19/07		98.375	21,000	4.86%	958.13	3.75%		1.11%	219.35
1499	12544RAG3	DLA Buy	06/18/07	93.375		625,000						
1500	12544RAG3	Customer Buy	06/19/07		98.125	18,000	5.09%	855.00	3.75%		1.34%	224.72
1501	12544RAG3	Customer Buy	06/19/07		98.125	10,000	5.09%	475.00	3.75%		1.34%	124.84
1502	12544RAG3	Customer Buy	06/19/07		98.125	20,000	5.09%	950.00	3.75%		1.34%	249.68
1503	12544RAG3	Customer Buy	06/19/07		98.125	15,000	5.09%	712.50	3.75%		1.34%	187.26
1504	12544RAG3	Customer Buy	06/19/07		98.125	10,000	5.09%	475.00	3.75%		1.34%	124.84
1505	12544RAG3	Customer Buy	06/19/07		98.125	25,000	5.09%	1,187.50	3.75%		1.34%	312.11
1506	12544RAG3	Customer Buy	06/19/07		98.125	30,000	5.09%	1,425.00	3.75%		1.34%	374.53
1507	12544RAG3	Customer Buy	06/19/07		98.125	25,000	5.09%	1,187.50	3.75%		1.34%	312.11
1508	12544RAG3	Customer Buy	06/19/07		98.125	17,000	5.09%	807.50	3.75%		1.34%	212.23
1509	12544RAG3	Customer Buy	06/19/07		98.125	20,000	5.09%	950.00	3.75%		1.34%	249.68
1510	12544RAG3	Customer Buy	06/19/07		98.125	20,000	5.09%	950.00	3.75%		1.34%	249.68
1511	12544RAG3	Customer Buy	06/19/07		98.125	10,000	5.09%	475.00	3.75%		1.34%	124.84
1512	12544RAG3	Customer Buy	06/19/07		98.125	20,000	5.09%	950.00	3.75%		1.34%	249.68
1513	12544RAG3	Customer Buy	06/19/07		98.125	25,000	5.09%	1,187.50	3.75%		1.34%	312.11
1514	12544RAG3	Customer Buy	06/19/07		97.500	15,000	4.42%	618.75	3.75%		0.67%	93.52
1515	12544RAG3	Customer Buy	06/19/07		98.125	20,000	5.09%	950.00	3.75%		1.34%	249.68
1516	12544RAG3	Customer Buy	06/19/07		98.125	13,000	5.09%	617.50	3.75%		1.34%	162.30
1517	12544RAG3	Customer Buy	06/19/07		98.125	10,000	5.09%	475.00	3.75%		1.34%	124.84
1518	12544RAG3	Customer Buy	06/19/07		98.125	170,000	5.09%	8,075.00	3.75%		1.34%	2,122.32
1519	12544RAG3	Customer Buy	06/19/07		98.125	50,000	5.09%	2,375.00	3.75%		1.34%	624.21
1520	12544RAG3	Customer Buy	06/19/07		98.125	20,000	5.09%	950.00	3.75%		1.34%	249.68
1521	12544RAG3	Customer Buy	06/19/07		98.125	10,000	5.09%	475.00	3.75%		1.34%	124.84
1522	172973ZF9	DLA Buy	06/18/07	90.531		50,000						
1523	172973ZF9	Customer Buy	06/19/07		96.750	20,000	6.87%	1,243.75	3.95%		2.92%	528.56
1524	172973ZF9	Customer Buy	06/19/07		96.750	10,000	6.87%	621.88	3.95%		2.92%	264.28
1525	31395XA70	DLA Buy	06/18/07	89.625		145,000						
	31395XA70	Customer Buy	06/19/07		95.625	50,000	6.69%	3,000.00	3.95%		2.74%	1,229.92

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max				Excess Markup Percentage	Excess Markup Dollars
								Markup in Dollars	Markup Percentage				
1526	9393362T9	DLA Buy	06/18/07	87.750	92.625	238,000	5.56%	1,950.00	3.75%			1.81%	633.77
1527	9393362T9	Customer Buy	06/19/07		92.625	40,000	5.56%	438.75	3.75%			1.81%	142.60
1528	9393362T9	Customer Buy	06/19/07		92.625	9,000	5.56%	1,121.25	3.75%			1.81%	364.42
1529	9393362T9	Customer Buy	06/19/07		92.625	23,000	5.56%	438.75	3.75%			1.81%	142.60
1530	9393362T9	Customer Buy	06/19/07		92.625	9,000	5.56%	731.25	3.75%			1.81%	237.66
1531	9393362T9	Customer Buy	06/19/07		92.625	15,000	5.56%	2,925.00	3.75%			1.81%	950.65
1532	9393362T9	Customer Buy	06/19/07		92.625	60,000	5.56%	1,462.50	3.75%			1.81%	475.32
1533	9393362T9	Customer Buy	06/19/07		92.625	30,000	5.56%	487.50	3.75%			1.81%	158.44
1534	9393362T9	Customer Buy	06/19/07		92.625	10,000	5.56%	1,316.25	3.75%			1.81%	427.79
1535	12544RAF5	DLA Buy	06/19/07	94.844	99.500	471,000	4.91%	465.63	3.75%			1.16%	109.96
1536	12544RAF5	Customer Buy	06/19/07		99.500	10,000	4.91%	698.44	3.75%			1.16%	164.94
1537	12544RAF5	Customer Buy	06/20/07		99.500	15,000	4.91%	465.63	3.75%			1.16%	109.96
1538	12544RAF5	Customer Buy	06/20/07		99.500	10,000	4.91%	5,354.69	3.75%			1.16%	1,264.56
1539	12544RAF5	Customer Buy	06/20/07		99.500	115,000	4.91%	465.63	3.75%			1.16%	109.96
1540	12544RAF5	Customer Buy	06/20/07		99.500	10,000	4.91%	465.63	3.75%			1.16%	109.96
1541	05953YBL4	DLA Buy	06/20/07	93.875	98.500	1,000,000	4.93%	925.00	3.75%			1.18%	220.94
1542	05953YBL4	Customer Buy	06/20/07		98.000	20,000	4.39%	701.25	3.75%			0.64%	102.79
1543	05953YBL4	Customer Buy	06/20/07		98.500	17,000	4.93%	508.75	3.75%			1.18%	121.52
1544	05953YBL4	Customer Buy	06/20/07		98.550	11,000	4.98%	2,197.25	3.75%			1.23%	542.69
1545	05953YBL4	Customer Buy	06/21/07		98.500	47,000	4.93%	1,063.80	3.75%			1.18%	254.13
1546	05953YBL4	Customer Buy	06/21/07		98.500	23,000	4.93%	1,156.31	3.75%			1.18%	276.23
1547	05953YBL4	Customer Buy	06/21/07		98.500	25,000	4.93%	1,156.31	3.75%			1.18%	276.23
1548	05953YBL4	Customer Buy	06/21/07		98.500	25,000	4.93%	2,590.12	3.75%			1.18%	618.75
1549	05953YBL4	Customer Buy	06/21/07		98.375	56,000	4.79%	2,115.17	3.75%			1.04%	480.63
1550	05953YBL4	Customer Buy	06/21/07		98.375	47,000	4.79%	675.06	3.75%			1.04%	147.01
1551	05953YBL4	Customer Buy	06/21/07		98.375	15,000	4.79%	1,935.16	3.75%			1.04%	421.42
1552	05953YBL4	Customer Buy	06/21/07		98.375	43,000	4.79%	765.06	3.75%			1.04%	166.61
1553	05953YBL4	Customer Buy	06/21/07		98.375	17,000	4.79%	945.08	3.75%			1.04%	205.81
1554	05953YBL4	Customer Buy	06/21/07		98.375	21,000	4.79%	450.04	3.75%			1.04%	98.01
1555	31395XKM6	DLA Buy	06/20/07	85.813	90.625	100,000	4.79%	1,299.38	3.75%			1.86%	430.54
1556	05953YBL4	DLA Buy	06/21/07	93.797	98.250	200,000	5.61%	445.31	3.75%			1.00%	93.57
1557	05953YBL4	Customer Buy	06/22/07		98.375	10,000	4.88%	457.81	3.75%			1.13%	106.08

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			
								Markup In Dollars	Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
1558	05953YBL4	Customer Buy	06/22/07	94.219	98.250	31,000	4.75%	1,380.47	3.75%	1.00%	290.07
1559	05953YBL4	Customer Buy	06/22/07		97.875	25,000	4.35%	1,019.53	3.75%	0.60%	140.18
1560	05953YBL4	Customer Buy	06/22/07		97.875	10,000	4.35%	407.81	3.75%	0.60%	56.07
1561	05953YBL4	DLA Buy	06/26/07			2,101,000					
1562	05953YBL4	Customer Buy	06/26/07		98.750	120,000	4.81%	5,437.50	3.75%	1.06%	1,197.67
1563	05953YBL4	Customer Buy	06/26/07		98.750	15,000	4.81%	679.69	3.75%	1.06%	149.71
1564	05953YBL4	Customer Buy	06/26/07		98.750	15,000	4.81%	679.69	3.75%	1.06%	149.71
1565	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1566	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1567	05953YBL4	Customer Buy	06/26/07		98.750	100,000	4.81%	4,531.25	3.75%	1.06%	998.06
1568	05953YBL4	Customer Buy	06/26/07		98.750	30,000	4.81%	1,359.38	3.75%	1.06%	299.42
1569	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1570	05953YBL4	Customer Buy	06/26/07		98.750	19,000	4.81%	860.94	3.75%	1.06%	189.63
1571	05953YBL4	Customer Buy	06/26/07		98.750	33,000	4.81%	1,495.31	3.75%	1.06%	329.36
1572	05953YBL4	Customer Buy	06/26/07		98.750	25,000	4.81%	1,132.81	3.75%	1.06%	249.52
1573	05953YBL4	Customer Buy	06/26/07		98.750	38,000	4.81%	1,721.88	3.75%	1.06%	379.26
1574	05953YBL4	Customer Buy	06/26/07		98.750	25,000	4.81%	1,132.81	3.75%	1.06%	249.52
1575	05953YBL4	Customer Buy	06/26/07		98.750	44,000	4.81%	1,993.75	3.75%	1.06%	439.15
1576	05953YBL4	Customer Buy	06/26/07		98.750	25,000	4.81%	1,132.81	3.75%	1.06%	249.52
1577	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1578	05953YBL4	Customer Buy	06/26/07		98.750	12,000	4.81%	543.75	3.75%	1.06%	119.77
1579	05953YBL4	Customer Buy	06/26/07		98.375	10,000	4.41%	415.63	3.75%	0.66%	62.31
1580	05953YBL4	Customer Buy	06/26/07		98.875	10,000	4.94%	465.63	3.75%	1.19%	112.31
1581	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1582	05953YBL4	Customer Buy	06/26/07		98.750	15,000	4.81%	679.69	3.75%	1.06%	149.71
1583	05953YBL4	Customer Buy	06/26/07		98.750	14,000	4.81%	634.38	3.75%	1.06%	139.73
1584	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1585	05953YBL4	Customer Buy	06/26/07		98.750	55,000	4.81%	2,492.19	3.75%	1.06%	548.93
1586	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1587	05953YBL4	Customer Buy	06/26/07		98.750	25,000	4.81%	1,132.81	3.75%	1.06%	249.52
1588	05953YBL4	Customer Buy	06/26/07		98.750	16,000	4.81%	725.00	3.75%	1.06%	159.69
1589	05953YBL4	Customer Buy	06/26/07		98.750	20,000	4.81%	906.25	3.75%	1.06%	199.61
1590	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1591	05953YBL4	Customer Buy	06/26/07		98.250	10,000	4.81%	453.13	3.75%	1.06%	99.81
1592	05953YBL4	Customer Buy	06/26/07		98.750	15,000	4.81%	604.69	3.75%	0.53%	74.71
1593	05953YBL4	Customer Buy	06/26/07		98.750	15,000	4.81%	679.69	3.75%	1.06%	149.71
1594	05953YBL4	Customer Buy	06/26/07		98.250	20,000	4.81%	906.25	3.75%	1.06%	199.61
1595	05953YBL4	Customer Buy	06/26/07		98.750	10,000	4.28%	403.13	3.75%	0.53%	49.80
1596	05953YBL4	Customer Buy	06/26/07		98.875	50,000	4.81%	2,265.63	3.75%	1.06%	499.03
						490,000	4.94%	22,815.63	3.75%	1.19%	5,503.14

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			
								Markup In Dollars	Markup Percentage	Excess Markup Percentage	Excess Markup in Dollars
1597	05953YBL4	Customer Buy	06/27/07		99.125	15,000	5.21%	735.94	3.75%	1.46%	205.96
1598	05953YBL4	Customer Buy	06/27/07		99.125	150,000	5.21%	7,359.38	3.75%	1.46%	2,059.58
1599	05953YBL4	Customer Buy	06/27/07		98.750	25,000	4.81%	1,132.81	3.75%	1.06%	249.52
1600	05953YBL4	Customer Buy	06/27/07		99.125	15,000	5.21%	735.94	3.75%	1.46%	205.96
1601	05953YBL4	Customer Buy	06/27/07		98.125	90,000	4.15%	3,515.63	3.75%	0.40%	335.71
1602	05953YBL4	Customer Buy	06/27/07		98.750	10,000	4.81%	453.13	3.75%	1.06%	99.81
1603	05953YBL4	Customer Buy	06/27/07		99.125	30,000	5.21%	1,471.88	3.75%	1.46%	411.92
1604	05953YBL4	Customer Buy	06/27/07		98.750	11,000	4.81%	498.44	3.75%	1.06%	109.79
1605	05953YBL4	Customer Buy	06/27/07		98.750	19,000	4.81%	860.94	3.75%	1.06%	189.63
1606	05953YBL4	Customer Buy	06/27/07		99.125	15,000	5.21%	735.94	3.75%	1.46%	205.96
1607	06051GCAS	DLA Buy	06/28/07	88.750		75,000					
1607	06051GCAS	Customer Buy	06/28/07		94.875	20,000	6.90%	1,225.00	3.50%	3.40%	603.75
1608	06051GCAS	Customer Buy	06/29/07		94.875	25,000	6.90%	1,531.25	3.50%	3.40%	754.69
1609	12566QAC7	DLA Buy	06/28/07	93.359		1,904,000					
1610	12566QAC7	Customer Buy	06/28/07		98.125	12,000	5.10%	571.88	3.00%	2.10%	235.78
					98.125	21,000	5.10%	1,000.78	3.00%	2.10%	412.62
1611	05950NBN7	DLA Buy	07/09/07	95.500		180,000					
1611	05950NBN7	Customer Buy	07/09/07		100.000	13,000	4.71%	585.00	3.00%	1.71%	212.54
1612	05950NBN7	Customer Buy	07/10/07		99.750	30,000	4.45%	1,275.00	3.00%	1.45%	415.51
1613	05950NBN7	Customer Buy	07/10/07		100.000	20,000	4.71%	900.00	3.00%	1.71%	326.99
1614	05950NBN7	Customer Buy	07/10/07		99.750	117,000	4.45%	4,972.50	3.00%	1.45%	1,620.49
1615	761118QA9	DLA Buy	07/10/07	96.000		65,000					
1615	761118QA9	Customer Buy	07/11/07		100.625	10,000	4.82%	462.50	3.00%	1.82%	174.50
1616	761118QA9	Customer Buy	07/11/07		100.625	15,000	4.82%	693.75	3.00%	1.82%	261.75
1617	9393365C3	DLA Buy	07/10/07	87.500		73,000					
	9393365C3	Customer Buy	07/11/07		92.375	73,000	5.57%	3,558.75	3.95%	1.62%	1,035.67
1618	12566QAC7	DLA Buy	07/11/07	93.250		1,000,000					
1618	12566QAC7	Customer Buy	07/11/07		98.125	42,000	5.23%	2,047.50	3.00%	2.23%	872.56
1619	12566QAC7	Customer Buy	07/11/07		98.125	13,000	5.23%	633.75	3.00%	2.23%	270.08
1620	12566QAC7	Customer Buy	07/11/07		98.125	50,000	5.23%	2,437.50	3.00%	2.23%	1,038.76
1621	12566QAC7	Customer Buy	07/11/07		98.000	10,000	5.08%	475.00	3.00%	2.09%	195.25
1622	12566QAC7	Customer Buy	07/11/07		98.125	50,000	5.23%	2,437.50	3.00%	2.23%	1,038.76
1623	12566QAC7	Customer Buy	07/11/07		98.000	57,000	5.09%	2,707.50	3.00%	2.09%	1,112.91
1624	12566QAC7	Customer Buy	07/12/07		98.000	18,000	5.09%	855.00	3.00%	2.09%	351.44
1625	12566QAC7	Customer Buy	07/12/07		98.125	67,000	5.23%	3,266.25	3.00%	2.23%	1,391.94

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1626	12566QAC7	Customer Buy	07/12/07		97.750	100,000	4.83%	4,500.00	3.00%		1.83%	1,702.47
1627	12566QAC7	Customer Buy	07/12/07		98.000	25,000	5.09%	1,187.50	3.00%		2.09%	488.12
1628	12566QAC7	Customer Buy	07/12/07		97.750	17,000	4.83%	765.00	3.00%		1.83%	289.42
1629	12566QAC7	Customer Buy	07/12/07		97.750	35,000	4.83%	1,575.00	3.00%		1.83%	595.86
1630	12566QAC7	Customer Buy	07/12/07		97.750	11,000	4.83%	495.00	3.00%		1.83%	187.27
1631	12566QAC7	Customer Buy	07/12/07		97.750	12,000	4.83%	540.00	3.00%		1.83%	204.30
1632	12566QAC7	Customer Buy	07/12/07		98.000	50,000	5.09%	2,375.00	3.00%		2.09%	976.23
1633	12566QAC7	Customer Buy	07/12/07		98.000	15,000	5.09%	712.50	3.00%		2.09%	292.87
1634	12566QAC7	Customer Buy	07/12/07		97.750	14,000	4.83%	630.00	3.00%		1.83%	238.35
1635	31395E2E6	DLA Buy	07/12/07	89.250		100,000	6.16%	5,500.00	3.95%		2.21%	1,974.66
	31395E2E6	Customer Buy	07/12/07		94.750	100,000						
1636	31397GY20	DLA Buy	07/13/07	95.250		40,000	4.72%	1,800.00	3.95%		0.77%	295.05
	31397GY20	Customer Buy	07/13/07		99.750	40,000						
1637	021469AD3	DLA Buy	07/16/07	94.000		1,000,000	4.65%	43,750.00	3.75%		0.90%	8,500.42
	021469AD3	Customer Buy	07/17/07		98.375	1,000,000						
1638	74162JAB3	DLA Buy	07/16/07	94.000		1,605,000	5.05%	2,849.89	3.75%		1.30%	734.89
	74162JAB3	Customer Buy	07/17/07		98.750	60,000	5.05%	1,187.45	3.75%		1.30%	306.21
1639	74162JAB3	Customer Buy	07/17/07		98.750	25,000	5.05%	18,999.28	3.75%		1.30%	4,899.28
1640	74162JAB3	Customer Buy	07/17/07		98.750	400,000	5.05%	712.47	3.75%		1.30%	183.72
1641	74162JAB3	Customer Buy	07/17/07		98.750	20,000	5.05%	949.96	3.75%		1.30%	244.96
1642	74162JAB3	Customer Buy	07/17/07		98.750	13,000	5.05%	614.66	3.75%		1.30%	159.23
1643	74162JAB3	Customer Buy	07/17/07		98.750	20,000	4.26%	799.00	3.75%		0.51%	94.94
1644	74162JAB3	Customer Buy	07/17/07		98.750	20,000	5.05%	949.96	3.75%		1.30%	244.96
1645	74162JAB3	Customer Buy	07/17/07		98.750	11,000	5.05%	522.48	3.75%		1.30%	134.73
1646	74162JAB3	Customer Buy	07/17/07		98.750	14,000	5.05%	664.97	3.75%		1.30%	171.47
1647	74162JAB3	Customer Buy	07/17/07		98.750	16,000	5.05%	759.97	3.75%		1.30%	195.97
1648	74162JAB3	Customer Buy	07/17/07		98.750	50,000	5.05%	2,374.91	3.75%		1.30%	612.41
1649	74162JAB3	Customer Buy	07/17/07		98.750	10,000	5.05%	474.98	3.75%		1.30%	122.48
1650	74162JAB3	Customer Buy	07/17/07		98.375	29,000	4.65%	1,268.68	3.75%		0.90%	246.43
1651	74162JAB3	Customer Buy	07/17/07		98.750	10,000	5.05%	474.98	3.75%		1.30%	122.48
1652	74162JAB3	Customer Buy	07/17/07		98.750	15,000	5.05%	712.47	3.75%		1.30%	183.72
1653	74162JAB3	Customer Buy	07/17/07		98.750	12,000	5.05%	664.97	3.75%		1.30%	171.47
1654	74162JAB3	Customer Buy	07/17/07		98.750	14,000	5.05%	2,707.40	3.75%		1.30%	698.15
1655	74162JAB3	Customer Buy	07/17/07		98.750	57,000	5.05%	1,399.92	3.75%		0.90%	271.92
1656	74162JAB3	Customer Buy	07/17/07		98.375	32,000	4.52%	4,844.70	3.75%		0.77%	826.20
1657	74162JAB3	Customer Buy	07/17/07		98.250	114,000						
1658	74162JAB3	Customer Buy	07/17/07									

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup In Dollars
								Markup In Dollars	Markup Percentage			
1659	31397CXU8 31397CXU8	DLA Buy Customer Buy	07/17/07 07/17/07	92.875	97.375	75,000 75,000	4.85%	3,375.00	3.95%	0.90%		623.56
1660	74162JAB3 74162JAB3	DLA Buy Customer Buy	07/17/07 07/18/07	93.438	98.750	2,000,000 8,000	5.69%	425.00	3.75%	1.94%		144.69
1661	74162JAB3	Customer Buy	07/18/07		98.750	8,000	5.69%	425.00	3.75%	1.94%		144.69
1662	31397HZ50 31397HZ50	DLA Buy Customer Buy	07/18/07 07/18/07	97.625	102.000	25,000 10,000	4.48%	437.50	3.95%	0.53%		51.88
1663	31394NB72 31394NB72	DLA Buy Customer Buy	08/09/07 08/10/07	87.750	93.750	64,000 54,000	6.84%	3,240.00	3.95%	2.89%		1,368.29
1664	94985JBC2 94985JBC2	DLA Buy Customer Buy	08/09/07 08/09/07	94.375	99,000	500,000 75,000	4.90%	3,468.75	3.00%	1.90%		1,345.34
1665	94985JBC2 94985JBC2	Customer Buy	08/09/07		99,000	50,000	4.90%	2,312.50	3.00%	1.90%		896.89
1666	94985JBC2 94985JBC2	Customer Buy	08/09/07		99,000	120,000	4.90%	5,550.00	3.00%	1.90%		2,152.54
1667	94985JBC2	Customer Buy	08/10/07		99,000	200,000	4.90%	9,250.00	3.00%	1.90%		3,587.57
1668	74162JAB3 74162JAB3	DLA Buy Customer Buy	08/13/07 08/14/07	94.375	99,000	300,000 100,000	4.90%	4,625.00	3.75%	1.15%		1,085.97
1669	74162JAB3	Customer Buy	08/14/07		99,000	160,000	4.90%	7,400.00	3.75%	1.15%		1,737.56
1670	94985JBC2 94985JBC2	DLA Buy DLA Buy	08/13/07 08/13/07	94.375 94.375		500,000 500,000						
1671	94985JBC2 94985JBC2	DLA Buy DLA Buy	08/13/07 08/13/07									
1672	94985JBC2 94985JBC2	DLA Buy Customer Buy	08/13/07 08/14/07	94.375	99,000	750,000 9,000	4.90%	2,035.00	3.00%	1.90%		789.27
1673	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	50,000	4.90%	416.25	3.00%	1.90%		161.44
1674	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	2,312.50	4.90%	3,237.50	3.00%	1.90%		896.89
1675	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	70,000	4.90%	3,237.50	3.00%	1.90%		1,255.65
1676	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	50,000	4.90%	2,312.50	3.00%	1.90%		896.89
1677	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	15,000	4.90%	693.75	3.00%	1.90%		269.07
1678	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	20,000	4.90%	925.00	3.00%	1.90%		358.76
1679	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	18,000	4.90%	832.50	3.00%	1.90%		322.88
1680	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	10,000	4.90%	462.50	3.00%	1.90%		179.38
1681	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	15,000	4.90%	693.75	3.00%	1.90%		269.07
1682	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	4,625.00	4.90%	4,625.00	3.00%	1.90%		1,793.79
1683	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	1,156.25	4.90%	1,156.25	3.00%	1.90%		448.45
1684	94985JBC2 94985JBC2	Customer Buy	08/14/07		99,000	25,000	4.90%	462.50	3.00%	1.90%		179.38
						10,000	4.90%	462.50	3.00%	1.90%		179.38
						11,000	4.90%	508.75	3.00%	1.90%		197.32

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Expert's Max			Excess Markup Percentage	Excess Markup in Dollars
								Markup in Dollars	Markup Percentage			
1685	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1686	94985JBQ2	Customer Buy	08/14/07		99.000	25,000	4.90%	1,156.25	3.00%		1.90%	448.45
1687	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1688	94985JBQ2	Customer Buy	08/14/07		99.000	90,000	4.90%	4,162.50	3.00%		1.90%	1,614.41
1689	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1690	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1691	94985JBQ2	Customer Buy	08/14/07		99.000	50,000	4.90%	2,312.50	3.00%		1.90%	886.89
1692	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1693	94985JBQ2	Customer Buy	08/14/07		99.000	15,000	4.90%	693.75	3.00%		1.90%	269.07
1694	94985JBQ2	Customer Buy	08/14/07		99.000	12,000	4.90%	555.00	3.00%		1.90%	215.25
1695	94985JBQ2	Customer Buy	08/14/07		99.000	25,000	4.90%	1,156.25	3.00%		1.90%	448.45
1696	94985JBQ2	Customer Buy	08/14/07		99.000	55,000	4.90%	2,543.75	3.00%		1.90%	986.58
1697	94985JBQ2	Customer Buy	08/14/07		99.000	25,000	4.90%	1,156.25	3.00%		1.90%	448.45
1698	94985JBQ2	Customer Buy	08/14/07		99.000	110,000	4.90%	5,087.50	3.00%		1.90%	1,973.16
1699	94985JBQ2	Customer Buy	08/14/07		99.000	40,000	4.90%	1,850.00	3.00%		1.90%	717.51
1700	94985JBQ2	Customer Buy	08/14/07		99.000	30,000	4.90%	1,387.50	3.00%		1.90%	538.14
1701	94985JBQ2	Customer Buy	08/14/07		99.000	40,000	4.90%	1,850.00	3.00%		1.90%	717.51
1702	94985JBQ2	Customer Buy	08/14/07		99.000	40,000	4.90%	1,850.00	3.00%		1.90%	717.51
1703	94985JBQ2	Customer Buy	08/14/07		99.000	30,000	4.90%	1,387.50	3.00%		1.90%	538.14
1704	94985JBQ2	Customer Buy	08/14/07		99.000	25,000	4.90%	1,156.25	3.00%		1.90%	448.45
1705	94985JBQ2	Customer Buy	08/14/07		99.000	25,000	4.90%	1,156.25	3.00%		1.90%	448.45
1706	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1707	94985JBQ2	Customer Buy	08/14/07		99.000	30,000	4.90%	1,387.50	3.00%		1.90%	538.14
1708	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1709	94985JBQ2	Customer Buy	08/14/07		99.000	10,000	4.90%	462.50	3.00%		1.90%	179.38
1710	94985JBQ2	Customer Buy	08/14/07		99.000	60,000	4.90%	2,775.00	3.00%		1.90%	1,076.27
	31396HN54	DLA Buy	08/14/07	88.500		83,000						
1711	31396HN54	Customer Buy	08/15/07		94.750	30,000	7.06%	1,875.00	3.95%		3.11%	826.26
1712	31396HN54	Customer Buy	08/15/07		94.750	30,000	7.06%	1,875.00	3.95%		3.11%	826.26
	31396LNS5	DLA Buy	08/14/07	94.625		150,000						
1713	31396LNS5	Customer Buy	08/14/07		99.500	150,000	5.15%	7,312.50	3.00%		2.15%	3,054.35
	31397HUW6	DLA Buy	08/17/07	96.250		100,000						
1714	31397HUW6	Customer Buy	08/17/07		100.500	100,000	4.42%	4,250.00	3.95%		0.47%	448.14
	05950NBC1	DLA Buy	08/20/07	90.500		156,000						
1715	05950NBC1	Customer Buy	08/21/07		95.500	32,000	5.52%	1,600.00	3.95%		1.57%	456.09
1716	05950NBC1	Customer Buy	08/21/07		95.500	25,000	5.52%	1,250.00	3.95%		1.57%	356.32
1717	05950NBC1	Customer Buy	08/21/07		95.500	43,000	5.52%	2,150.00	3.95%		1.57%	612.87

Transaction Number	CMO CUSIP	Transaction Type	Date	DLA Price(s)	Customer Price	Face Value of CMO in Dollars	Markup Percentage	Markup In Dollars	Expert's Max		
									Markup Percentage	Excess Markup Percentage	Excess Markup In Dollars
1718	31396GR52	DLA Buy	08/20/07	97.625	102.000	350,000	4.48%	743.75	3.95%	0.53%	88.19
1719	31396GR52	Customer Buy	08/21/07		102.000	17,000	4.48%	437.50	3.95%	0.53%	51.88
1720	31396GR52	Customer Buy	08/21/07		102.000	55,000	4.48%	2,406.25	3.95%	0.53%	285.33
1721	31396GR52	Customer Buy	08/21/07		102.000	13,000	4.48%	568.75	3.95%	0.53%	67.44
1722	31396GR52	Customer Buy	08/21/07		102.000	10,000	4.48%	437.50	3.95%	0.53%	51.88
1723	31396GR52	Customer Buy	08/21/07		102.000	15,000	4.48%	656.25	3.95%	0.53%	77.82
1724	31396GR52	Customer Buy	08/21/07		102.000	10,000	4.48%	437.50	3.95%	0.53%	51.88
1725	31396GR52	Customer Buy	08/21/07		102.000	25,000	4.48%	1,093.75	3.95%	0.53%	129.69
1726	31396GR52	Customer Buy	08/21/07		102.000	17,000	4.48%	743.75	3.95%	0.53%	88.19
1727	31396GR52	Customer Buy	08/21/07		102.000	50,000	4.48%	2,187.50	3.95%	0.53%	259.39
1728	31396GR52	Customer Buy	08/21/07		102.000	25,000	4.48%	1,093.75	3.95%	0.53%	129.69
1729	749580AG1	DLA Buy	08/20/07	94.750	99.500	500,000	5.01%	950.00	3.75%	1.26%	239.38
1730	749580AG1	Customer Buy	08/21/07		99.500	20,000	5.01%	950.00	3.75%	1.26%	239.38
1731	749580AG1	Customer Buy	08/21/07		99.500	15,000	5.01%	712.50	3.75%	1.26%	179.53
1732	749580AG1	Customer Buy	08/21/07		99.500	10,000	5.01%	475.00	3.75%	1.26%	119.69
1733	749580AG1	Customer Buy	08/21/07		99.500	35,000	5.01%	1,662.50	3.75%	1.26%	418.91
1734	749580AG1	Customer Buy	08/21/07		99.500	10,000	5.01%	475.00	3.75%	1.26%	119.69
1735	749580AG1	Customer Buy	08/21/07		99.500	25,000	5.01%	1,187.50	3.75%	1.26%	299.22
1736	749580AG1	Customer Buy	08/21/07		99.500	50,000	5.01%	2,375.00	3.75%	1.26%	598.44
1737	749580AG1	Customer Buy	08/21/07		99.500	25,000	5.01%	1,187.50	3.75%	1.26%	299.22
1738	749580AG1	Customer Buy	08/21/07		99.500	10,000	5.01%	475.00	3.75%	1.26%	119.69
1739	749580AG1	Customer Buy	08/21/07		99.500	20,000	5.01%	950.00	3.75%	1.26%	239.38
1740	05948XQP9	DLA Buy	08/27/07	84.375	89.250	195,000	5.78%	487.50	3.95%	1.83%	154.22
1741	05948XQP9	Customer Buy	08/28/07		89.250	10,000	5.78%	2,730.00	3.95%	1.83%	863.64
1742	05948XQP9	Customer Buy	08/28/07		89.250	10,000	5.78%	487.50	3.95%	1.83%	154.22
1743	05948XQP9	Customer Buy	08/28/07		89.250	9,000	5.78%	438.75	3.95%	1.83%	138.80
1744	05948XQP9	Customer Buy	08/28/07		89.250	15,000	5.78%	731.25	3.95%	1.83%	231.33
1745	05948XQP9	Customer Buy	08/28/07		89.250	47,000	5.78%	2,291.25	3.95%	1.83%	724.84
1746	05948XQP9	Customer Buy	08/28/07		89.250	40,000	5.78%	1,950.00	3.95%	1.83%	616.88

Total Excess Markup in Dollars

\$ 692,731.24

Total Transactions

1746