

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20070104513-01**

TO: Department of Market Regulation
Financial Industry Regulatory Authority ("FINRA")

RE: Citigroup Global Markets Inc., Respondent
Broker-Dealer
CRD No. 7059

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Citigroup Global Markets Inc. (the "firm") submits this Letter of Acceptance, Waiver and Consent ("AWC") for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against the firm alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. The firm hereby accepts and consents, without admitting or denying the findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA is a party, prior to a hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by FINRA:

BACKGROUND

The firm has been a member of FINRA since October 16, 1936, and its registration remains in effect.

RELEVANT DISCIPLINARY HISTORY

The firm has the following prior relevant disciplinary history:

- On October 25, 2010, FINRA accepted an AWC in which the firm was censured and fined, among other fines, \$68,500 for equity trade reporting violations.

20070104513 (includes, 20070119351, 20080130047, 20080152616, 20090169584, 20090183751, 20090192320, 20090201004, 20090201017, 20100231644, 20100234094, 20090192819, 20100239538, 20100251268, 20100251295, 20110283996, 20110298007, and 20110297989) JSM

- On February 18, 2009, FINRA accepted an AWC in which the firm was censured and fined, among other fines, \$325,000 for Order Audit Trail System ("OATS") reporting violations.
- On January 6, 2009, FINRA accepted an AWC in which the firm was censured, ordered to pay restitution, and fined among other fines, \$5,000 for equity trade reporting violations, \$5,000 for trade reporting supervision, and \$10,000 for OATS reporting violations.

SUMMARY

The Trade Reporting Section, the OATS Section, and the Customer Issues Section of the Department of Market Regulation (collectively "the staff") reviewed the firm's compliance with certain NASD, FINRA, and SEC Rules in the following matters:

In matter nos. 20080152616, 20090192320, 20100234094, 20080130047, 20090169584, 20090183751, 20090201004, 20090201017, 20100231644, 20100251268, 20100251295, 20110283996, 20110298007, and 20110297989, the staff reviewed the firm's compliance with equity trade reporting obligations for various time periods between February 1, 2002 and August 31, 2011.

In matter nos. 20090192819 and 20100239538, the staff reviewed the firm's compliance with OATS reporting rules during the period of January 1, 2009 through April 30, 2009, and January 1, 2010 through March 31, 2010, respectively.

In matter no. 20070119351, the staff reviewed the firm's compliance with the NASD and Exchange Act Rules applicable to effecting transactions in securities while trading halts were in effect during the first half of 2007.

In matter no. 20070104513, the staff reviewed the firm's compliance with the NASD Rules applicable to the handling and execution of market orders during the period of January 1, 2007 through March 31, 2007.

FACTS AND VIOLATIVE CONDUCT

Matter no. 20080152616

1. During the period from February 2002 through August 2007, the firm failed to report to the FINRA/Nasdaq Trade Reporting Facility ("FNTRF") 67,875 last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(b).
2. During the period from May 1, 2008 through August 31, 2008, the firm failed, within 90 seconds after execution, to transmit to the FNTRF 4,054 last sale reports of transactions in designated securities. These transactions constitute two percent of the transactions the firm reported to the FNTRF during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(a) and a pattern or practice of late reporting without exceptional circumstances in violation of NASD Rule 2110.
3. During the period from May 1, 2008 through August 31, 2008, the firm failed, within 90 seconds after execution, to transmit to the FNTRF 1,634 last sale reports of transactions in designated securities and failed to designate through the FNTRF such last sale reports as late. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(a).
4. During the period from May 1, 2008 through August 31, 2008, the firm failed to report the correct time of execution to the FNTRF in 5,965 last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(c)(5).
5. During the period from May 1, 2008 through August 31, 2008, the firm incorrectly designated as ".PRP" to the FNTRF 569 last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(a)(5)(G).

Matter no. 20090192320

6. During the period from September 1, 2006 through May 11, 2009, the firm incorrectly reported the second leg of 75,612 riskless principal transactions to the Nasdaq Trade Reporting Facility ("NNTRF") or the FNTRF. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(d) (for reports prior to December 15, 2008) and FINRA Rule 6380A (for reports on and after December 15, 2008).

Matter no. 20100234094

7. During the period from July 9, 2007 through March 14, 2008, the firm failed to report to the FNTRF 17,675 last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(b).

Matter no. 20080130047

8. During the period from September 1, 2007 through April 30, 2008, the firm failed to report to the FNTRF 161 last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 4632(b).
9. During the period reviewed, the firm failed to report to the OTC Trade Reporting Facility ("OTCTRF") 148 last sale reports of transactions in OTC Equity securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 6620(b).

Matter no. 20090169584

10. During the period from September 1, 2008 through December 31, 2008, the firm failed to report to the OTCTRF 148 trade reports by 6:30 p.m. Eastern Time (or the end of the reporting session that was in effect at that time) on the trade date. These transactions constitute 98 percent of all eligible transactions (150) in PORTAL securities the firm reported to the OTCTRF during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 6732(a) and a pattern or practice of late reporting without exceptional circumstances in violation of NASD Rule 2110.¹
11. During the period reviewed, the firm failed to report to the OTCTRF the correct time of execution for 148 transactions in Reportable Securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 6732(a)(1).

Matter no. 20090183751

12. During the period from January 1, 2009 through April 30, 2009, the firm: (a) failed to accept or decline in the FNTRF 167 trade reports in Reportable Securities within 20 minutes after execution, in violation of FINRA Rule 7230A(b); and (b) failed to accept or decline in the OTCTRF 1,435 trade reports in Reportable Securities within 20 minutes after execution in violation of FINRA Rule 7330(b). In total, the firm failed to accept or decline 1,602 trade reports in Reportable Securities within 20 minutes after execution, or six percent of all transactions (27,503) that the firm had an obligation to accept or decline during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rules 7230A(b) and 7330(b).

¹ On December 15, 2008, NASD Rule 2110 was superseded by FINRA Rule 2010.

Matter no. 20090201004

13. During the period from January 1, 2009 through April 30, 2009, the firm failed, within 90 seconds after execution, to transmit to the FNTRF 4,108 last sale reports of transactions in designated securities. These transactions constitute five percent of the transactions that the firm reported to the FNTRF during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.
14. During the period reviewed, the firm failed, within 90 seconds after execution, to transmit to the FNTRF 86 last sale reports of transactions in designated securities and failed to designate through the FNTRF such last sale reports as late. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A.
15. During the period reviewed, the firm failed to report the correct time of execution to the FNTRF in 30 last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A(c)(5).

Matter no. 20090201017

16. During the period from July 1, 2009 through August 31, 2009, the firm erroneously reported 135 transactions in foreign equity securities which were executed and reported in foreign countries to the OTCTRF, in violation of FINRA Rule 6622(g)(2).

Matter no. 20100231644

17. During the period from January 1, 2010 through April 30, 2010, the firm: (a) failed to accept or decline in the FNTRF 406 trade reports in Reportable Securities within 20 minutes after execution, in violation of FINRA Rule 7230A(b); and (b) failed to accept or decline in the OTCTRF 404 trade reports in Reportable Securities within 20 minutes after execution in violation of FINRA Rule 7330(b). In total, the firm failed to accept or decline 810 trade reports in Reportable Securities within 20 minutes after execution, approximately three percent of all transactions (29,709) that the firm had an obligation to accept or decline during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rules 7230A(b) and 7330(b).

Matter no. 20100251268

18. During the period from May 1, 2010 through August 31, 2010, the firm failed, within 90 seconds after execution, to transmit to the FNTRF 85,731 last sale reports of transactions in designated securities. These transactions constitute 39 percent of the eligible transactions the firm reported to the FNTRF during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of

FINRA Rule 6380A and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.

19. During the period reviewed, the firm failed to report the correct time of execution to the FNTRF for seven last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A(c)(5).

Matter no. 20100251295

20. During the period from May 1, 2010 through August 31, 2010, the firm failed, within 90 seconds after execution, to transmit to the OTCTRF 277 last sale reports of transactions in OTC Equity securities. These transactions constitute two percent of the eligible transactions the firm reported to the OTCTRF during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.
21. During the period reviewed, the firm failed to designate to the OTCTRF 39 last sale reports as late. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(a).
22. During the period reviewed, the firm failed to report the correct time of execution to the OTCTRF for 15 late, last sale reports for transactions in OTC Equity securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(c)(5).

Matter no. 20110283996

23. During the period from January 1, 2011 through April 30, 2011, the firm failed to accept or decline in the FNTRF 2,224 transactions in Reportable Securities within 20 minutes after execution. These 2,224 transactions represent 31 percent of all eligible transactions the firm was required to accept or decline within 20 minutes during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 7230A(b).

Matter no. 20110298007

24. During the period from May 1, 2011 through August 31, 2011, the firm failed, within 30 seconds after execution, to transmit to the OTCTRF 349 last sale reports of transactions in OTC Equity securities. These transactions constitute seven percent of the eligible transactions the firm reported to the OTCTRF during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.

25. During the period reviewed, the firm failed to designate to the OTCTRF 28 last sale reports as late. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(a).
26. During the period reviewed, the firm failed to report the correct time of execution to the OTCTRF for nine late, last sale reports for transactions in OTC Equity securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(c)(5).

Matter no. 20110297989

27. During the period from May 1, 2011 through August 31, 2011, the firm failed, within 30 seconds after execution, to transmit to the FNTRF 35,414 last sale reports of transactions in designated securities. These transactions constitute seven percent of the eligible transactions the firm reported to the FNTRF during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.
28. During the period reviewed, the firm failed to mark 17,902 transactions reported to the FNTRF as riskless principal transactions. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A(d).
29. During the period reviewed, the firm failed to report the correct time of execution to the FNTRF for 9,377 last sale reports of transactions in designated securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A(c)(5).
30. In the fourteen equity trade reporting matters outlined in paragraphs 1 through 29 above, the staff has identified reporting deficiencies at the firm spanning a period from February 2002 through August 2011. During this period the firm's supervisory system did not provide for supervision reasonably designed to achieve compliance with respect to the applicable securities laws and regulations, and the Rules of NASD, concerning equity trade reporting. The conduct described in this paragraph constitutes a violation of NASD Rules 2110 and 3010 for the period prior to December 15, 2008, and a violation of FINRA Rule 2010 and NASD Rule 3010 for the period on and after December 15, 2008.

Matter no. 20090192819

31. During the period from January 1, 2009 through March 31, 2009, the firm transmitted to OATS 95 Execution or Combined Order/Execution Reports that contained inaccurate, incomplete, or improperly formatted data. Because of the inaccurate, missing, or improperly formatted data, the OATS system was unable to link the execution reports to the related trade reports in a FINRA trade reporting system. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 7450.

Matter no. 20100239538

32. During the period from January 1, 2010 through March 31, 2010, the firm transmitted to OATS 50 reports that contained inaccurate and incomplete data. Specifically, the reports failed to include a "Desk Receipt Time." The conduct described in this section constitutes 50 distinct violations of FINRA Rule 7450.
33. During the period reviewed, the firm failed to show the time of order receipt on the memorandum of 50 brokerage orders. The conduct described in this paragraph constitutes separate and distinct violations of SEC Rule 17a-3 and NASD Rule 3110.

Matter no. 20070119351

34. During the period from January 1, 2007 through June 30, 2007, the firm effected 16 transactions in seven securities while a trading halt was in effect for each of the securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rules 2110 and 3340.
35. During the period of January 1, 2007 through June 30, 2007, the firm effected four transactions in one security after the securities registration was revoked pursuant to Section 12(j) of the Exchange Act. The conduct described in this paragraph constitutes separate and distinct violations of Section 12(j) of the Exchange Act.

Matter no. 20070104513

36. During the period of January 1, 2007 through March 31, 2007, the firm failed to fully and promptly execute a customer market order in 78 instances in violation of NASD Rules 2110 and 2111(a); and, for 37 of those 78 orders, as reflected on Exhibit A which is attached, the firm failed to use reasonable diligence to ascertain the best inter-dealer market for the subject securities so that the resultant prices to its customers would be as favorable as possible under prevailing market conditions in violation of NASD Rules 2320 and 2110.

B. The firm also consents to the imposition of the following sanctions:

1. A censure and a fine of \$800,000 which is comprised of: \$477,500 for the equity trade reporting violations; \$225,000 for the supervision violation; \$55,000 for the OATS reporting violations; \$15,000 for the market order timeliness and best execution violations; \$12,500 for the record keeping violations; \$15,000 for the violations related to trading during a halt, and restitution by Respondent to the customers involved in the transactions in matter no. 20070104513 identified on Exhibit A in the amount of \$1,055.85 plus interest 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 violative conduct until the date this AWC is accepted by the National Adjudicatory Council. A registered principal of the firm shall submit satisfactory proof of payment of the restitution, or of reasonable and documented efforts undertaken to effect restitution, to the COMPLIANCE ASSISTANT, LEGAL SECTION, MARKET REGULATION DEPARTMENT, 9509 KEY WEST AVENUE, ROCKVILLE, MD 20850 or in an e-mail from a work-related account of the registered principal to MarketRegulationComp@finra.org, no later than 120 days after acceptance of this AWC. If for any reason, Respondent cannot locate any customer after reasonable and documented efforts within such period, or such additional period agreed to by the staff, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed-property or abandoned-property fund for the state in which the customer is known to have last resided.
2. An undertaking to: (1) report through the electronic Form T process the 309 unreported transactions identified in matter no. 20080130047, the 67,875 unreported transactions identified in matter no. 20080152616, and the 17,675 transactions identified in matter no. 20100234094, no later than 60 days after the approval of this AWC by the Office of Disciplinary Affairs ("ODA") or the National Adjudicatory Council ("NAC") Review Subcommittee; and, (2) pay the fees assessed for these previously unreported transactions pursuant to Section 31 of the Securities Exchange Act of 1934 (Exchange Act).
3. An undertaking to provide three reports, written and oral, to FINRA on dates that are no more than six months, 12 months, and 18 months after the date of the Notice of Acceptance of this AWC, regarding the implementation and effectiveness of the firm's equity trade reporting systems and supervision of equity trade reporting. The written reports shall be certified by an officer of the firm and shall address, at a minimum, the implementation and performance of the firm's new equity trade reporting system; the steps taken by supervisory personnel to review for equity trade reporting compliance and the results of supervisory reviews; training; and modifications or recommendations for improvements to the system. In addition, the firm will provide a summary, written and oral, and any subsequent updates of the results of a review of the new trade reporting system to be performed by the firm's Quality Assurance Team.

Upon written request showing good cause, FINRA staff may extend any of the procedural dates set forth herein.

The firm agrees to pay the monetary sanctions upon notice that this AWC has been accepted and that such payments are due and payable. It has submitted an Election of Payment form showing the method by which it proposes to pay the fine imposed.

The firm specifically and voluntarily waives any right to claim that it is unable to pay, now or at any time hereafter, the monetary sanctions imposed in this matter.

The sanctions imposed herein shall be effective on a date set by FINRA staff.

II.

WAIVER OF PROCEDURAL RIGHTS

The firm specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against the firm;
- B. To be notified of the Complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made and to have a written decision issued; and
- D. To appeal any such decision to the National Adjudicatory Council ("NAC") and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, the firm specifically and voluntarily waives any right to claim bias or prejudgment of the General Counsel, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including acceptance or rejection of this AWC.

The firm further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

III.

OTHER MATTERS

The firm understands that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against the firm; and
- C. If accepted:
 - 1. this AWC will become part of the firm's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against the firm;
 - 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about the firm's disciplinary record;
 - 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and
 - 4. the firm may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. The firm may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects the firm's: (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.
- D. The firm may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. The firm understands that it may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

The undersigned, on behalf of the Firm, certifies that a person duly authorized to act on its behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that it has agreed to the AWC's provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce the firm to submit it.

April 12, 2013
Date

Respondent
Citigroup Global Markets Inc.

By: Elaine H. Mandelbaum
Name: Elaine H. Mandelbaum
Title: Managing Director

Reviewed by:

W. Hardy Calhoun
W. Hardy Calhoun
Sidley Austin LLP
555 California St. Suite 2000
San Francisco, CA 94104

Accepted by FINRA:

5/30/13
Date

Signed on behalf of the
Director of ODA, by delegated authority

Thomas R. Gira
Thomas R. Gira
Executive Vice President
Department of Market Regulation

EXHIBIT A

Matter no. 20070104513.

(Order Handling)

Item No.	Date	Issue	Quantity	Trade Time	Restitution
1	1/4/2007	HEES	40	9:31:22	N/A
2	1/9/2007	BLKB	9	9:31:09	N/A
3	1/10/2007	LHCG	48	9:31:21	\$23.04
4	1/10/2007	SONC	43	9:31:21	N/A
5	1/11/2007	FCFS	60	9:31:18	\$1.20
6	1/16/2007	MRVC	130	9:31:22	\$1.30
7	1/19/2007	CELL	33	9:31:22	\$1.32
8	1/19/2007	MIDD	19	9:31:25	N/A
9	1/22/2007	STSI	300	9:31:24	\$6.00
10	1/24/2007	CTXS	400	9:31:13	N/A
11	1/31/2007	MATR	35	9:31:31	N/A
12	1/31/2007	NTGR	41	9:31:21	\$1.64
13	2/1/2007	WSTM	2000	9:31:20	N/A
14	2/5/2007	MALL	250	9:31:20	\$7.50
15	2/6/2007	CVBF	512	9:31:29	\$5.12
16	2/6/2007	PWAV	500	9:31:13	\$5.00
17	2/6/2007	NAVI	2000	9:42:00	N/A
18	2/13/2007	NDAQ	40	11:17:23	N/A
19	2/14/2007	MICC	141	9:31:21	\$7.05
20	2/27/2007	AFCE	68	9:31:24	\$1.36
21	2/27/2007	CENT	188	9:31:13	\$3.76
22	2/27/2007	CVBF	220	9:31:17	\$15.40
23	2/27/2007	CROX	181	15:16:10	\$10.86
24	3/1/2007	TOMO	1000	11:16:11	N/A
25	3/1/2007	AKAM	1000	11:24:41	\$75.00
26	3/2/2007	INTC	500	15:47:32	\$25.00
27	3/8/2007	GENR	60	12:38:23	N/A
28	3/13/2007	PMTI	64	9:31:21	\$4.48
29	3/14/2007	ABCO	90	9:31:35	N/A
30	3/14/2007	GLYT	125	9:31:30	\$13.75
31	3/20/2007	GILD	283	9:31:29	N/A
32	3/20/2007	HCSG	104	9:31:26	\$6.24
33	3/20/2007	COLM	2	9:32:00	N/A
34	3/21/2007	SNDK	1	9:31:13	N/A
35	3/21/2007	SHLD	50	9:31:34	\$1.00
36	3/26/2007	DLLR	31	9:31:38	N/A
37	3/26/2007	ISRG	40	9:31:37	N/A
38	3/26/2007	ALXA	300	10:18:39	N/A
39	3/27/2007	DLLR	6	9:31:36	N/A
40	3/27/2007	NOVL	36	9:31:35	N/A
41	3/29/2007	INSU	300	9:31:35	\$13.50
42	3/30/2007	PRGX	246	9:31:34	N/A
43	1/9/2007	AINV	1003	11:54:05	\$10.03
44	1/10/2007	BIDU	500	10:38:08	N/A

EXHIBIT A

Matter no. 20070104513

(Order Handling)

45	1/12/2007	MSFT	100	11:51:46	\$2.00
46	1/19/2007	RIMM	100	9:31:24	N/A
47	1/22/2007	EASY	1745	9:31:23	\$1.35
48	1/22/2007	DIGE	450	9:31:18	\$180.00
49	1/24/2007	NTLI	400	9:31:24	\$8.00
50	1/29/2007	CYAN	2500	9:43:19	\$19.00
51	2/1/2007	LCAPA	50	9:31:28	N/A
52	2/7/2007	EBAY	15	9:31:19	N/A
53	2/7/2007	CSCO	579	9:32:35	N/A
54	2/9/2007	CINF	45	9:31:20	N/A
55	2/12/2007	SBUX	100	12:44:33	N/A
56	2/12/2007	IRBT	25	13:20:54	N/A
57	2/14/2007	PACR	150	10:11:39	\$1.50
58	2/27/2007	AAPL	200	14:37:28	\$28.00
59	2/27/2007	MXIM	199	15:16:50	N/A
60	2/28/2007	GOOG	500	9:52:14	N/A
61	2/28/2007	AAPL	100	9:57:48	N/A
62	3/1/2007	DAKT	100	9:32:19	N/A
63	3/1/2007	AMGN	5	9:59:12	N/A
64	3/1/2007	ACTS	1400	10:43:01	\$155.00
65	3/2/2007	HAWK	1000	14:51:49	N/A
66	3/2/2007	PALM	300	15:24:10	N/A
67	3/2/2007	LRCX	59	15:41:19	\$2.95
68	3/2/2007	MSFT	20	15:48:07	\$1.00
69	3/5/2007	ARCC	367	9:32:12	N/A
70	3/6/2007	HMIN	200	10:05:14	\$20.00
71	3/9/2007	CLWR	150	10:49:41	\$166.50
72	3/15/2007	SNDK	100	9:30:50	N/A
73	3/16/2007	GOOG	2	9:31:22	N/A
74	3/21/2007	ACAS	2100	9:36:33	\$45.00
75	3/21/2007	CSCO	100	14:48:36	N/A
76	3/22/2007	HERO	150	9:31:36	\$3.00
77	3/30/2007	ARCC	5000	9:31:46	N/A
78	3/30/2007	DNDN	700	15:26:17	\$183.00
				Total Restitution:	\$1,055.85