

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NOS. 2008013629601 & 2010023001602**

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

RE: StateTrust Investments, Inc., Respondent
Member
CRD No. 104651

and

Joseph Luis Turnes (a/k/a Jose Luis Turnes), Respondent
General Securities Representative
CRD No. 2023535

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, StateTrust Investments, Inc. ("StateTrust") and Joseph Luis Turnes ("Turnes") (collectively, "Respondents") submit 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 Respondents alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondents hereby accept and consent, 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

StateTrust Investments, Inc.

StateTrust is a FINRA member and has been a member since April 2001. The firm maintains its headquarters in Miami, Florida and has a branch office in Caracas, Venezuela. Approximately 17 registered persons are currently associated with the firm. StateTrust conducts a general retail securities business. The firm generates the majority of its revenues from commissions and markups/markdowns.

Joseph Luis Turnes

Since November 1989, Turnes has been associated with three FINRA members at different times. In January 1990, Turnes registered with FINRA as a General Securities Representative ("GSR"). He subsequently acquired Series 3, 63, and 65 licenses. On March 1, 2002, StateTrust filed a Form U4 for Turnes, commencing his association with the firm as of that date. Turnes is currently associated with StateTrust and registered with FINRA, through the firm, as a GSR and an Operations Professional.

RELEVANT DISCIPLINARY HISTORY

StateTrust Investments, Inc.

In October 2012, FINRA accepted AWC No. 2010024689901 from StateTrust, wherein the firm was censured and fined \$20,000 for Trade Reporting Compliance Engine ("TRACE") reporting deficiencies in the second quarter of 2010 and first quarter of 2011, in violation of FINRA Rules 6730(a), (c)(6), (c)(8) and 2010.

In June 2011, FINRA accepted AWC No. 20100216427101 from StateTrust, wherein the firm was censured and fined \$12,500 for TRACE reporting and related supervisory deficiencies in the fourth quarter of 2009, in violation of FINRA Rules 6730(a), (c)(8) and 2010 and NASD Rule 3010.

In October 2008, FINRA accepted AWC No. 2006006160101 from StateTrust, wherein the firm was censured and fined \$10,000 for TRACE reporting and related supervisory deficiencies in the second quarter of 2006, in violation of NASD Rules 6230(a), (c)(8), 3010, and 2110.

In February 2007, NASD accepted AWC No. 2005000179201 from StateTrust, wherein the firm was censured and fined \$7,500 for TRACE reporting deficiencies in the third quarter of 2004, in violation of NASD Rule 6230(c)(8).

Joseph Luis Turnes

Turnes does not have a relevant disciplinary history.

OVERVIEW

In 563 corporate bond transactions executed between March 2007 and June 2010 (the "Review Period"), StateTrust, acting through Turnes, charged unfair prices to customers, in violation of NASD Rules 2440 and 2110, IM-2440-1, IM-2440-2, and FINRA Rule 2010.

In 85 of the 563 transactions, StateTrust, acting through Turnes, charged excessive markups/markdowns of 8% or more above/below the prevailing market price of the bonds to customers. By acting in contravention of Sections 17(a)(2) and (a)(3) of the Securities Act of 1933, StateTrust and Turnes violated NASD Rule 2110 and FINRA Rule 2010.¹

In connection with the 563 transactions, StateTrust failed to reasonably supervise the trading activity of Turnes during the Review Period, which resulted in the aforementioned markup/markdown and pricing violations. As a result of the foregoing, StateTrust violated NASD Rules 3010 and 2110 and FINRA Rule 2010.

Between September 2008 and March 2009, StateTrust failed to report 64 transactions to TRACE, in violation of NASD Rule 6230 and FINRA Rule 6730.²

Lastly, from 2006 through 2009, StateTrust, through its clearing firm and registered representatives, distributed prospectuses for its affiliated mutual funds that contain a material misstatement of fact, in violation of NASD Rule 2110 and FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

Background Information

StateTrust is affiliated with several entities that are directly or indirectly owned by the same investors. StateTrust's affiliates include: a bank incorporated in St. Lucia; an insurance company incorporated in the British Virgin Islands; and several mutual funds incorporated in the British Virgin Islands (collectively, the "Affiliated Entities"). The Affiliated Entities maintain accounts with, and execute transactions through, StateTrust.

During all relevant periods, Turnes was the Chairman of StateTrust's affiliated bank and life insurance company and also was indirectly the largest shareholder of StateTrust and the bank and insurance affiliates, with an ownership interest of approximately 30% in those entities. From at least June 2008 through the present, Turnes has served as its head trader. As such, he sets the prices at which StateTrust buys and sells certain securities, including corporate bonds. From the inceptions of the Affiliated Entities through the present, Turnes has served as their head trader and has managed their securities portfolios, which are held in accounts with StateTrust. In that capacity, Turnes sets the prices at which the Affiliated Entities buy and sell certain securities, including corporate bonds.

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

² On December 15, 2008, FINRA Rule 6730 superseded NASD Rule 6230.

Transactions with Markups/Markdowns over 8%

In 85 corporate bond transactions with customers executed between September 2008 and September 2009, StateTrust, acting through Turnes, charged markups/markdowns of 8% or more above/below the prevailing market price of the bonds. In 78 of the 85 transactions, StateTrust, acting through Turnes, acquired the bonds from its bank or insurance affiliates and then sold them at a markup from that price to a customer at a price of 8% or more above the prevailing market price of the bonds. In the other seven transactions, StateTrust, acting through Turnes, bought the bonds from customers at prices of 8% or more below the prevailing market price of the bonds and then sold the bonds at a slight markup from that price to its bank or insurance affiliates. The excessive markups/markdowns on the 85 transactions range from a high of 23.58% to a low of 8.03%. The charges in excess of the prevailing market prices on the transactions total \$124,644.02.

One example of the transactions described above occurred on November 18, 2008. On that day, a customer sold 10 corporate bonds (total par value of \$10,000) to StateTrust at 86.00 per bond. Later that day, StateTrust sold the 10 bonds to its insurance affiliate at 87.00 per bond. That day, numerous transactions in the same bonds were executed before and after the subject transactions, which established that the prevailing market price for the bonds was 95.21 per bond. Therefore, StateTrust bought the bonds from the customer at a price that was 9.67% below the prevailing market price for the bonds and sold them to its insurance affiliate at a price that was 8.62% below the prevailing market price for the bonds.

Turnes determined the prices at which StateTrust bought and sold the bonds in the 85 transactions. He used his telephone and/or Bloomberg terminal to price the bonds. Turnes' failure to properly price the bonds caused StateTrust to charge, and its customer to be charged, excessive markups/markdowns on the transactions.

StateTrust caused confirmations and account statements reflecting the 85 transactions to be mailed or otherwise provided to its customers. The confirmations and account statements did not disclose the excessive nature of the markups/markdowns. StateTrust and Turnes also failed to otherwise disclose those markups/markdowns to the customers in the 85 transactions.

In connection with the 85 transactions, by use of the means or instruments of communication in interstate commerce and/or by use of the mails, StateTrust, acting through Turnes, obtained money by means of an omission to state a material fact necessary in order to make statements made, in light of the circumstances under which they were made, not misleading, and also engaged in transactions which operate as a fraud or deceit upon the customers. As a result of the foregoing, StateTrust and Turnes acted in contravention of Sections 17(a)(2)

and (a)(3) of the Securities Act and thus violated NASD Rule 2110 and FINRA Rule 2010.

Fair Pricing Violations

In 563 corporate bond transactions executed between March 2007 and June 2010, StateTrust, acting through Turnes, charged unfair prices to customers.³ Turnes determined the prices at which StateTrust bought and sold the bonds to the customers. In 324 of the transactions, StateTrust bought the bonds from a customer at an unfair price and then sold them to either its bank or insurance affiliates or bought the bonds from one of those affiliates and then sold them to another customer at an unfair price. In most of the other 239 transactions, StateTrust bought the bonds from the street and then sold them to a customer at an unfair price or bought the bonds from a customer at an unfair price and sold them to the street. In 227 of the 563 transactions, StateTrust charged markups/markdowns of 5% or more. The excessive charges on all 563 transactions total \$336,472.03. By charging unfair prices on the transactions, StateTrust and Turnes violated NASD Rules 2440 and 2110, IM-2440-1, IM-2440-2, and FINRA Rule 2010.

Related Supervisory Violations

During the Review Period, StateTrust's written supervisory procedures included provisions regarding the determination of the appropriate amount of markups/markdowns and surveillance tools and activities to detect excessive markups/markdowns and other trading irregularities. Despite these procedures, StateTrust failed to detect or identify the 563 bond transactions in which Turnes caused it to charge excessive markups/markdowns. Therefore, the firm failed to implement a system reasonably designed to achieve compliance with its pricing obligations. More specifically, StateTrust failed to supervise Turnes in a manner reasonably designed to prevent the aforementioned pricing violations. As a result of the foregoing, StateTrust violated NASD Rules 3010 and 2110 and FINRA Rule 2010.⁴

Related TRACE Reporting Violations

Between September 2008 and March 2009, StateTrust, through its clearing firm, attempted to report 64 transactions in TRACE-eligible securities to TRACE. However, TRACE rejected the submissions because the transactions were executed at prices outside the range of prices at which other transactions in the same bonds were executed. StateTrust, however, failed to resubmit the

³ As referenced above, the 563 transactions include the aforementioned 85 transactions.

⁴ In April 2012, FINRA accepted AWC No. 2010023001601 from JWC, the former Chief Compliance Officer of StateTrust, wherein JWC was fined \$20,000 and suspended for five months in a principal capacity for failing to reasonably supervise the subject trading activity, in violation of NASD Rules 3010 and 2110 and FINRA Rule 2010.

transactions to TRACE. By failing to report the 64 transactions to TRACE, StateTrust violated NASD Rule 6230 and FINRA Rule 6730.

Distribution of Prospectuses Containing a Material Misstatement

From at least 2006 through 2009, StateTrust sold shares of its affiliated mutual funds to customers. In connection with the sales, StateTrust, through its clearing firm and registered representatives, provided those customers with prospectuses that contain a material misstatement of fact. Specifically, the prospectuses provide that the funds' investment managers have "complete discretion-regarding the selection of such brokers and the amount of brokerage commissions and fees paid to such brokers, *none of whom are currently affiliated with the Investment Manager . . .*" (Emphasis added.) In fact, between 2006 and 2009, StateTrust, which was, and still is, affiliated with the funds' investment managers, generated significant revenue from sales charges and commissions for transactions executed for its affiliated mutual funds. As a result of the foregoing, StateTrust violated NASD Rule 2110 and FINRA Rule 2010.

B. Respondents also consent to the imposition of the following sanctions:

StateTrust consents to a censure, a fine of \$1,045,000, and the payment of restitution in the total amount of \$353,319.05, plus interest; and

Turnes consents to a \$75,000 fine and a six-month suspension from association with any FINRA member in all capacities.

Respondents agree to pay the monetary sanctions upon notice that this AWC has been accepted and that such payments are due and payable. Respondents have submitted Election of Payment forms showing the method(s) by which they propose to pay the fines imposed.

Respondents specifically and voluntarily waive any right to claim that they are unable to pay, now or at any time hereafter, the monetary sanctions imposed in this matter.

Restitution is ordered to be paid to the customers listed on Attachment A hereto in the total amount of \$353,319.05, plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. 6621(a)(2), from the latter of January 1, 2009 or the date of each transaction as set forth in Attachment A, until the date this AWC is accepted by the NAC.

A registered principal on behalf of StateTrust shall submit satisfactory proof of payment of restitution or of reasonable and documented efforts undertaken to effect restitution. Such proof shall be submitted to Tina Gubb, Esq., Chief Counsel, FINRA – Department of Market Regulation, 9509 Key West Avenue, Rockville, MD, 20850, either by letter that identifies StateTrust and AWC Nos.

2008013629601 and 2010023001602 or by e-mail from a work-related account of the registered principal of StateTrust to EnforcementNotice@FINRA.org. This proof shall be provided to the FINRA staff member listed above no later than 120 days after acceptance of the AWC.

If for any reason StateTrust cannot locate any customer identified in Attachment A after reasonable and documented efforts within 120 days from the date the AWC is accepted, or such additional period agreed to by a FINRA staff member in writing, StateTrust 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 last known to have resided. StateTrust shall provide satisfactory proof of such action to the FINRA staff member identified above and in the manner described above, within 14 days of forwarding the undistributed restitution and interest to the appropriate state authority.

StateTrust has specifically and voluntarily waived any right to claim an inability to pay at any time hereafter the monetary sanctions imposed in this matter.

The imposition of a restitution order or any other monetary sanction herein, and the timing of such ordered payments, does not preclude customers from pursuing their own actions to obtain restitution or other remedies.

Turnes understands that if he is barred or suspended from associating with any FINRA member, he becomes subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, Turnes may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension (see FINRA Rules 8310 and 8311).

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

II.

WAIVER OF PROCEDURAL RIGHTS

Respondents specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against them;
- 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, Respondents specifically and voluntarily waive any right to claim bias or prejudice 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.

Respondents further specifically and voluntarily waive 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

Respondents understand 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 them; and
- C. If accepted:
 - 1. this AWC will become part of their permanent disciplinary records and may be considered in any future actions brought by FINRA or any other regulator against them;
 - 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about their disciplinary records;
 - 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and
 - 4. Respondents 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. Respondents 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 their: (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.

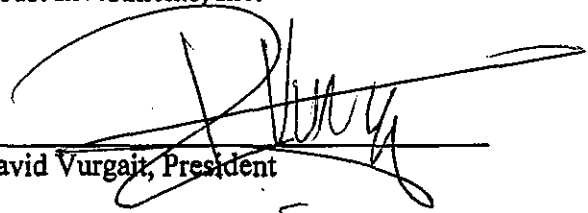
- D. Respondents may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondents understand that they may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement 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 StateTrust, 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 StateTrust has agreed to its 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.

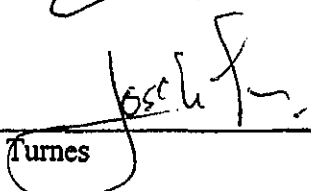
I, Joseph Luis Turnes, certify that I have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that I have agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce me to submit it.

StateTrust Investments, Inc.

6/10/2013
Date (mm/dd/yyyy)

By: 
David Vurgait, President

6/16/2013
Date (mm/dd/yyyy)


Joseph Luis Turnes

Reviewed by:

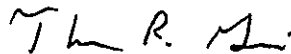


Mitchell E. Herr, Esq.
Counsel for Respondents
Holland & Knight LLP
701 Brickell Avenue, Suite 3000
Miami, FL 33131
(305) 789-7736

Accepted by FINRA:

6/11/13
Date

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



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Tina Gubb, Chief Counsel
Shannon D. Rozner, Counsel
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FINANCIAL INDUSTRY REGULATORY AUTHORITY

In re the Matter of:

StateTrust Investments, Inc. and Joseph
Luis Turnes,

FINRA STAR Nos.: 2008013629601 and
2010023001602

/

STATEMENT OF CORRECTIVE ACTION

StateTrust Investments, Inc. ("StateTrust") sincerely regrets that an issue arose with regard to its pricing in certain corporate bond transactions. In addition to returning all of the markups/markdowns (with interest) at issue to its clients, StateTrust has taken the following corrective actions:

- (1) StateTrust now documents its price discovery efforts so that it can demonstrate the reasonableness of its pricing.
- (2) To ensure that there is no concern about the role of StateTrust's affiliates in client transactions, StateTrust does not cross trades between its retail customers and its affiliates.
- (3) StateTrust has strengthened its relevant written supervisory procedures.

This Statement of Corrective Action is submitted by StateTrust. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA, or its staff.

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
1	03/13/07	ABS.HA	01310QCT0	10	94.00	\$351.50
2	03/14/07	ABS.HA	01310QCT0	10	104.00	\$351.50
3	10/10/07	SLM.GHC	78442FED6	15	87.00	\$469.13
4	10/11/07	SLM.GHC	78442FED6	15	96.00	\$469.13
5	11/27/07	SLM.GHC	78442FED6	20	86.50	\$747.17
6	11/27/07	SLM.GHC	78442FED6	10	86.50	\$373.59
7	11/27/07	SLE.HH	803111AQ6	10	85.00	\$365.00
8	11/28/07	SLE.HH	803111AQ6	10	95.00	\$365.00
9	11/28/07	SLM.GHC	78442FED6	10	98.00	\$151.41
10	11/28/07	SLM.GHC	78442FED6	10	98.00	\$151.41
11	11/28/07	SLM.GHC	78442FED6	10	98.00	\$151.41
12	01/03/08	SLM.OR	78442FBH0	60	84.00	\$1,375.50
13	01/03/08	SLM.OR	78442FBH0	11	84.00	\$252.18
14	01/03/08	SLM.OR	78442FBH0	11	84.00	\$252.18
15	01/03/08	SLM.OR	78442FBH0	14	84.00	\$320.95
16	01/03/08	SLM.OR	78442FBH0	14	84.00	\$320.95
17	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
18	01/03/08	SLM.OR	78442FBH0	16	84.00	\$366.80
19	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
20	01/03/08	SLM.OR	78442FBH0	14	84.00	\$320.95
21	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
22	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
23	01/03/08	SLM.OR	78442FBH0	18	84.00	\$412.65
24	01/03/08	SLM.OR	78442FBH0	25	84.00	\$573.13
25	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
26	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
27	01/03/08	SLM.OR	78442FBH0	22	84.00	\$504.35
28	01/03/08	SLM.OR	78442FBH0	22	84.00	\$504.35
29	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
30	01/03/08	SLM.OR	78442FBH0	16	84.00	\$366.80
31	01/03/08	SLM.OR	78442FBH0	97	84.00	\$2,223.73
32	01/03/08	SLM.OR	78442FBH0	20	84.00	\$458.50
33	01/17/08	JNJ.GL	478160AM6	15	96.00	\$354.17
34	01/17/08	GE.TK	36962GUL6	20	101.50	\$214.26
35	01/22/08	BRKA.IJ	084664AD3	10	95.00	\$556.36
36	01/22/08	GS.TV	38143UAW1	20	96.25	\$208.68
37	01/24/08	CS.JE	22541LAB9	12	99.50	\$502.91
38	01/24/08	GS.TV	38143UAW1	20	105.00	\$560.54
39	01/24/08	S.IS	65332VBG7	35	90.50	\$218.17
40	01/25/08	JPM.RM	46625HAX8	29	95.50	\$584.35
41	01/29/08	S.IS	65332VBG7	10	99.75	\$231.00
42	01/29/08	S.IS	65332VBG7	10	99.75	\$231.00
43	01/29/08	S.IS	65332VBG7	15	99.75	\$346.50
44	01/30/08	JPM.RM	46625HAX8	9	104.00	\$88.43
45	01/30/08	JPM.RM	46625HAX8	10	104.00	\$98.26
46	01/30/08	JPM.RM	46625HAX8	10	104.00	\$98.26
47	02/12/08	COF.HN	14040HAQ8	10	92.75	\$82.50
48	03/11/08	BSC.HB	073902BR8	12	95.00	\$301.80

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
49	03/12/08	BSC.HB	073902BR8	12	103.25	\$58.72
50	03/28/08	S.IS	65332VBG7	10	82.00	\$247.48
51	03/28/08	F.GAA	345397TZ6	10	83.00	\$170.87
52	06/18/08	BUD.HF	035229CU5	10	92.25	\$160.08
53	06/23/08	BUD.HA	035229CP6	15	89.00	\$667.04
54	06/23/08	HD.GG	467076AN2	100	95.25	\$1,939.95
55	08/28/08	BUD.HA	035229CP6	20	91.25	\$577.29
56	09/16/08	RCL.GN	780153AQ5	14	85.00	\$235.20
57	09/17/08	RCL.GN	780153AQ5	10	95.00	\$466.50
58	09/17/08	RCL.GN	780153AQ5	4	95.00	\$186.60
59	09/19/08	RCL.GN	780153AQ5	8	95.00	\$206.74
60	09/26/08	GS.WD	38141GES9	12	81.00	\$818.64
61	09/26/08	GS.WD	38141GES9	10	81.00	\$682.20
62	09/26/08	GS.WD	38141GES9	20	81.00	\$1,364.40
63	09/26/08	AXP.LX	0258M0CY3	10	104.75	\$375.75
64	09/26/08	WWY.GB	982526AB1	10	91.00	\$243.62
65	09/26/08	WWY.GB	982526AB1	10	91.00	\$243.62
66	09/26/08	WWY.GB	982526AB1	25	91.00	\$609.04
67	09/26/08	C.HFP	172967EU1	10	101.00	\$248.41
68	09/26/08	C.HFP	172967EU1	12	101.00	\$298.09
69	09/26/08	C.HFP	172967EU1	10	101.00	\$248.41
70	09/26/08	C.HFP	172967EU1	12	101.00	\$298.09
71	09/30/08	MER.GLS	5901884M7	20	91.00	\$1,505.00
72	09/30/08	MER.GLS	5901884M7	15	91.00	\$1,128.75
73	09/30/08	C.HFP	172967EU1	14	100.00	\$1,120.00
74	09/30/08	C.HFP	172967EU1	12	100.00	\$960.00
75	09/30/08	C.HFP	172967EU1	14	100.00	\$1,120.00
76	09/30/08	FCX.GL	35671DAS4	20	107.00	\$1,201.50
77	09/30/08	FCX.GL	35671DAS4	14	107.00	\$841.05
78	09/30/08	WWY.GB	982526AB1	18	91.00	\$560.56
79	09/30/08	WWY.GB	982526AB1	20	91.00	\$622.84
80	09/30/08	WWY.GB	982526AB1	12	91.00	\$334.97
81	09/30/08	SBC.OB	78387GAP8	20	100.25	\$497.45
82	09/30/08	SBC.OB	78387GAP8	12	100.25	\$298.47
83	09/30/08	GE.HFA	36962G3U6	20	93.00	\$225.91
84	09/30/08	GE.HFA	36962G3U6	14	93.00	\$158.14
85	09/30/08	WWY.GB	982526AB1	15	91.00	\$116.65
86	10/01/08	DOW.LG	260543BV4	12	100.00	\$368.10
87	10/01/08	DOW.LG	260543BV4	8	100.00	\$245.40
88	10/01/08	SBC.OB	78387GAP8	10	100.50	\$124.32
89	10/02/08	DOW.LG	260543BV4	50	99.75	\$2,905.88
90	10/02/08	BAC.GWY	060505DA9	50	91.50	\$2,343.02
91	10/02/08	C.HFP	172967EU1	60	98.25	\$2,084.63
92	10/06/08	BAC.GWY	060505DA9	15	99.00	\$2,100.00
93	10/06/08	BAC.GWY	060505DA9	10	99.00	\$1,400.00
94	10/06/08	BAC.GWY	060505DA9	14	99.00	\$1,960.00
95	10/06/08	FCX.GL	35671DAS4	50	105.00	\$3,918.35
96	10/06/08	FCX.GL	35671DAS4	14	105.00	\$1,097.14

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
97	10/06/08	JPM.HGH	46625HGN4	60	98.75	\$2,644.88
98	10/06/08	SBC.OB	78387GAP8	10	99.00	\$278.82
99	10/06/08	SBC.OB	78387GAP8	15	99.00	\$418.22
100	10/06/08	SBC.OB	78387GAP8	14	99.00	\$377.13
101	10/06/08	SBC.OB	78387GAP8	50	99.00	\$1,346.88
102	10/06/08	DEO.HW	25243YAM1	15	100.00	\$252.00
103	10/06/08	DEO.HW	25243YAM1	14	100.00	\$235.20
104	10/06/08	DEO.HW	25243YAM1	14	100.00	\$235.20
105	10/06/08	GE.HFA	36962G3U6	10	92.00	\$115.75
106	10/06/08	GE.HFA	36962G3U6	14	92.00	\$162.05
107	10/06/08	GE.HFA	36962G3U6	14	92.00	\$162.05
108	10/06/08	GE.HFA	36962G3U6	12	92.00	\$138.90
109	10/06/08	GE.HFA	36962G3U6	10	92.00	\$115.75
110	10/08/08	FCX.GL	35671DAS4	10	101.50	\$532.88
111	10/08/08	FCX.GL	35671DAS4	10	101.50	\$532.88
112	10/08/08	FCX.GL	35671DAS4	10	101.50	\$532.88
113	10/08/08	FCX.GL	35671DAS4	10	101.50	\$532.88
114	10/08/08	BAC.GWY	060505DA9	10	89.00	\$374.00
115	10/08/08	BAC.GWY	060505DA9	10	89.00	\$374.00
116	10/08/08	BAC.GWY	060505DA9	10	89.00	\$374.00
117	10/08/08	BAC.GWY	060505DA9	10	89.00	\$374.00
118	10/09/08	BAC.GWY	060505DA9	11	88.50	\$956.34
119	10/09/08	BAC.GWY	060505DA9	10	88.50	\$869.40
120	10/09/08	FCX.GL	35671DAS4	14	102.75	\$1,230.32
121	10/09/08	C.HFP	172967EU1	10	99.50	\$810.00
122	10/09/08	AXP.LX	0258M0CY3	10	102.50	\$789.80
123	10/09/08	AXP.LX	0258M0CY3	15	102.50	\$1,184.70
124	10/09/08	BAC.GWY	060505DA9	12	88.50	\$388.80
125	10/09/08	BAC.GWY	060505DA9	12	88.50	\$388.80
126	10/09/08	BAC.GWY	060505DA9	15	88.50	\$486.00
127	10/09/08	BAC.GWY	060505DA9	10	88.50	\$324.00
128	10/09/08	BAC.GWY	060505DA9	10	88.50	\$324.00
129	10/09/08	BAC.GWY	060505DA9	15	88.50	\$486.00
130	10/09/08	HD.GH	437076AP7	12	90.50	\$324.06
131	10/09/08	HD.GH	437076AP7	10	90.50	\$270.05
132	10/09/08	HD.GH	437076AP7	10	90.50	\$270.05
133	10/09/08	HD.GH	437076AP7	15	90.50	\$405.07
134	10/09/08	HD.GH	437076AP7	10	90.50	\$270.05
135	10/14/08	FCX.GL	35671DAS4	10	94.50	\$850.00
136	10/14/08	FCX.GL	35671DAS4	30	94.50	\$2,550.00
137	10/14/08	BAC.GWY	060505DA9	35	93.00	\$2,828.35
138	10/15/08	FCX.GL	35671DAS4	10	95.50	\$950.00
139	10/15/08	AXP.LX	0258M0CY3	10	101.00	\$907.70
140	10/15/08	MER.GLS	5901884M7	10	88.75	\$765.00
141	10/15/08	JPM.HGH	46625HGN4	10	96.00	\$370.81
142	10/15/08	AXP.LX	0258M0CY3	20	101.00	\$132.84
143	10/16/08	FCX.GL	35671DAS4	11	95.50	\$1,732.50
144	10/16/08	FCX.GL	35671DAS4	11	95.50	\$1,732.50

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
145	10/16/08	MER.GLS	5901884M7	14	88.75	\$967.40
146	10/16/08	JPM.HGH	46625HGN4	15	96.00	\$398.94
147	10/16/08	JPM.HGH	46625HGN4	11	96.00	\$292.55
148	10/16/08	GE.HFA	36962G3U6	6	92.00	\$102.64
149	10/17/08	ORCL.GH	68402LAC8	10	92.00	\$432.53
150	10/17/08	T.KG	00206RAJ1	12	87.50	\$362.59
151	10/20/08	FCX.GL	35671DAS4	25	91.00	\$2,632.50
152	10/20/08	ORCL.GH	68402LAC8	12	93.00	\$375.34
153	10/22/08	FCX.GL	35671DAS4	10	91.00	\$900.00
154	10/22/08	FCX.GL	35671DAS4	15	90.50	\$1,275.00
155	10/22/08	AXP.LX	0258M0CY3	14	98.00	\$788.90
156	10/22/08	DEO.HW	25243YAM1	10	92.00	\$439.74
157	10/22/08	DEO.HW	25243YAM1	10	92.00	\$439.74
158	10/22/08	AXP.LX	0258M0CY3	10	98.00	\$385.88
159	10/22/08	AXP.LX	0258M0CY3	15	98.00	\$578.81
160	10/22/08	AXP.LX	0258M0CY3	12	98.00	\$463.05
161	10/22/08	AXP.LX	0258M0CY3	14	98.00	\$540.23
162	10/22/08	AXP.LX	0258M0CY3	12	98.00	\$463.05
163	10/22/08	CVS.GT	126650BH2	10	86.00	\$74.30
164	10/23/08	DEO.HW	25243YAM1	10	93.00	\$361.81
165	10/23/08	DEO.HW	25243YAM1	10	92.00	\$261.81
166	10/24/08	CVS.GT	126650BH2	22	86.75	\$987.43
167	10/24/08	AXP.LX	0258M0CY3	25	96.00	\$1,068.61
168	10/24/08	DEO.HW	25243YAM1	25	92.00	\$637.01
169	10/24/08	CVS.GT	126650BH2	10	86.75	\$202.29
170	10/27/08	BAC.GWY	060505DA9	25	86.00	\$1,021.11
171	10/27/08	BAC.GWY	060505DA9	10	86.00	\$408.44
172	10/28/08	AZO.GC	053332AC6	10	81.50	\$468.75
173	10/28/08	MER.GLS	5901884M7	16	88.00	\$682.00
174	10/28/08	MER.GLS	5901884M7	10	88.00	\$426.25
175	10/28/08	MER.GLS	5901884M7	13	88.00	\$554.13
176	10/28/08	KFT.GD	50075NAB0	15	91.00	\$229.64
177	10/29/08	FCX.GL	35671DAS4	12	87.25	\$1,113.60
178	10/29/08	AZO.GC	053332AC6	10	92.50	\$368.75
179	10/29/08	KFT.GD	50075NAB0	15	99.75	\$220.13
180	10/30/08	BAC.GWY	060505DA9	10	88.00	\$836.70
181	10/30/08	BAC.GWY	060505DA9	12	88.00	\$1,004.04
182	10/30/08	BAC.GWY	060505DA9	10	88.00	\$836.70
183	10/30/08	FCX.GL	35671DAS4	12	86.00	\$820.80
184	10/30/08	FCX.GL	35671DAS4	16	86.00	\$1,094.40
185	10/30/08	AXP.LX	0258M0CY3	10	97.00	\$463.50
186	10/30/08	FCX.GL	35671DAS4	10	86.00	\$200.88
187	10/31/08	HOT.GB	450912AC4	20	67.00	\$2,582.00
188	10/31/08	TGT.HZ	87612EAM8	10	82.00	\$773.00
189	10/31/08	DEO.HW	25243YAM1	12	92.00	\$857.24
190	10/31/08	GS.WO	38141GEV2	20	83.00	\$1,031.50
191	10/31/08	KFT.GD	50075NAB0	10	90.00	\$360.46
192	11/03/08	WWY.GB	982526AB1	14	78.00	\$1,328.74

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
193	11/03/08	HD.GH	437076AP7	10	85.00	\$485.36
194	11/03/08	HD.GH	437076AP7	14	84.00	\$549.30
195	11/03/08	CVS.GT	126650BH2	10	86.00	\$67.00
196	11/06/08	HD.GH	437076AP7	10	85.70	\$454.67
197	11/06/08	HD.GH	437076AP7	10	85.70	\$454.67
198	11/06/08	CVS.GT	126650BH2	10	93.00	\$483.30
199	11/06/08	CVS.GT	126650BH2	10	93.00	\$483.30
200	11/06/08	BDX.GH	075887AS8	10	89.00	\$408.25
201	11/07/08	DEO.HW	25243YAM1	10	93.00	\$446.87
202	11/07/08	HOT.GB	450912AC4	10	85.00	\$402.33
203	11/07/08	HOT.GB	450912AC4	10	85.00	\$402.33
204	11/07/08	JNJ.GL	478160AM6	10	93.00	\$488.63
205	11/07/08	DEO.HW	25243YAM1	18	93.00	\$711.73
206	11/07/08	DEO.HW	25243YAM1	10	93.00	\$395.41
207	11/07/08	BDX.GH	075887AS8	10	100.00	\$408.25
208	11/07/08	BAC.GWY	060505DA9	12	87.00	\$364.83
209	11/07/08	FO.GJ	349631AM3	7	99.00	\$161.78
210	11/07/08	FO.GJ	349631AM3	8	99.00	\$184.89
211	11/07/08	COST.GF	22160KAC9	10	99.00	\$200.66
212	11/07/08	TGT.HZ	87612EAM8	10	95.00	\$145.76
213	11/07/08	GS.WO	38141GEV2	10	96.50	\$135.39
214	11/07/08	GS.WO	38141GEV2	10	96.50	\$135.39
215	11/07/08	KFT.GD	50075NAB0	10	101.00	\$52.52
216	11/10/08	C.OG	172967BJ9	15	90.00	\$618.99
217	11/10/08	FCX.GL	35671DAS4	12	87.00	\$306.24
218	11/10/08	CVS.GT	126650BH2	15	90.00	\$166.40
219	11/10/08	CVS.GT	126650BH2	12	90.00	\$133.12
220	11/11/08	KFT.GD	50075NAB0	10	91.00	\$479.13
221	11/11/08	C.OG	172967BJ9	15	100.00	\$277.43
222	11/12/08	WWY.GB	982526AB1	13	81.00	\$877.50
223	11/12/08	IP.IP	460146CA9	11	92.00	\$267.33
224	11/12/08	IP.IP	460146CA9	13	92.00	\$315.94
225	11/13/08	WWY.GB	982526AB1	30	82.00	\$2,400.00
226	11/13/08	HOT.GL	85590AAK0	30	84.00	\$1,974.00
227	11/13/08	HOT.GL	85590AAK0	10	84.00	\$658.00
228	11/18/08	BUD.HI	035229CX9	10	86.00	\$921.00
229	11/21/08	FCX.GL	35671DAS4	12	79.00	\$1,104.60
230	11/21/08	FO.GJ	349631AM3	10	89.25	\$566.46
231	11/25/08	FCX.GL	35671DAS4	18	78.00	\$2,352.60
232	11/25/08	FO.GH	349631AK7	15	95.75	\$1,162.50
233	11/26/08	FCX.GL	35671DAS4	12	79.00	\$1,688.40
234	11/26/08	SLM.GHC	78442FED6	10	84.00	\$800.00
235	11/26/08	CVS.GT	126650BH2	23	91.50	\$968.30
236	11/26/08	FO.GJ	349631AM3	10	98.00	\$20.48
237	12/01/08	FCX.GL	35671DAS4	14	80.25	\$1,024.80
238	12/01/08	DEO.HW	25243YAM1	10	97.75	\$134.94
239	12/01/08	DEO.HW	25243YAM1	10	97.75	\$134.94
240	12/02/08	DEO.HW	25243YAM1	15	97.75	\$599.78

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
241	12/03/08	DEO.HW	25243YAM1	12	97.25	\$338.22
242	12/04/08	DEO.HW	25243YAM1	10	97.75	\$187.31
243	12/04/08	DEO.HW	25243YAM1	13	97.75	\$243.50
244	12/08/08	FCX.GL	35671DAS4	10	78.00	\$1,154.00
245	12/08/08	FCX.GL	35671DAS4	20	78.00	\$2,308.00
246	12/08/08	FCX.GL	35671DAS4	13	78.00	\$1,500.20
247	12/08/08	FCX.GL	35671DAS4	13	78.00	\$1,500.20
248	12/08/08	RIG.GZ	893830AS8	10	95.50	\$514.28
249	12/08/08	RIG.GZ	893830AS8	10	95.50	\$514.28
250	12/08/08	RIG.GZ	893830AS8	20	95.50	\$1,028.55
251	12/08/08	RIG.GZ	893830AS8	10	95.50	\$514.28
252	12/10/08	FCX.GL	35671DAS4	8	77.00	\$700.00
253	12/10/08	FCX.GL	35671DAS4	12	77.00	\$797.76
254	12/10/08	FCX.GL	35671DAS4	30	77.00	\$1,994.40
255	12/11/08	FCX.GL	35671DAS4	60	78.00	\$5,718.00
256	12/11/08	FCX.GL	35671DAS4	40	78.00	\$3,812.00
257	12/11/08	FCX.GL	35671DAS4	10	78.00	\$953.00
258	12/11/08	FCX.GL	35671DAS4	20	78.00	\$1,906.00
259	12/11/08	FCX.GL	35671DAS4	10	78.00	\$953.00
260	12/11/08	FCX.GL	35671DAS4	12	78.00	\$1,143.60
261	12/12/08	FCX.GL	35671DAS4	10	78.75	\$688.00
262	12/12/08	FCX.GL	35671DAS4	10	78.75	\$688.00
263	12/12/08	FCX.GL	35671DAS4	40	78.75	\$2,752.00
264	12/15/08	FCX.GL	35671DAS4	12	78.00	\$225.00
265	12/15/08	FCX.GL	35671DAS4	18	78.00	\$337.50
266	12/15/08	AXP.LX	0258MOCY3	14	96.00	\$274.16
267	12/16/08	IP.IP	460146CA9	12	84.50	\$840.00
268	12/16/08	FCX.GL	35671DAS4	12	81.00	\$729.96
269	12/16/08	YUM.GE	988498AA9	10	105.50	\$497.73
270	12/16/08	FCX.GL	35671DAS4	12	79.00	\$355.11
271	12/16/08	FCX.GL	35671DAS4	28	79.00	\$828.59
272	12/17/08	FCX.GL	35671DAS4	40	80.00	\$2,600.00
273	12/17/08	AA.GH	013817AF8	40	98.00	\$2,303.94
274	12/18/08	FCX.GL	35671DAS4	14	84.25	\$910.00
275	12/18/08	FCX.GL	35671DAS4	30	83.25	\$1,856.25
276	12/18/08	YUM.GE	988498AA9	30	106.75	\$1,764.31
277	12/18/08	YUM.GE	988498AA9	10	106.50	\$563.10
278	12/18/08	YUM.GE	988498AA9	10	106.50	\$563.10
279	12/19/08	FCX.GL	35671DAS4	12	84.50	\$780.00
280	12/19/08	FCX.GL	35671DAS4	10	84.50	\$650.00
281	12/19/08	YUM.GE	988498AA9	10	106.75	\$483.28
282	12/19/08	YUM.GE	988498AA9	10	106.75	\$483.28
283	12/19/08	FCX.GL	35671DAS4	10	82.50	\$333.00
284	12/22/08	FCX.GL	35671DAS4	22	84.50	\$685.14
285	12/22/08	FCX.GL	35671DAS4	10	84.50	\$311.43
286	12/22/08	FCX.GL	35671DAS4	12	84.50	\$373.71
287	12/22/08	YUM.GE	988498AA9	10	106.50	\$140.08
288	12/22/08	YUM.GE	988498AA9	15	106.50	\$205.25

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
289	12/23/08	FCX.GL	35671DAS4	10	84.50	\$431.50
290	12/23/08	YUM.GE	988498AA9	10	106.50	\$136.83
291	12/26/08	BRKA.IJ	084664AD3	10	95.25	\$875.44
292	12/29/08	FO.GB	349631AD3	50	104.25	\$2,364.63
293	12/29/08	FCX.GL	35671DAS4	10	86.50	\$334.11
294	12/29/08	FCX.GL	35671DAS4	50	86.00	\$1,420.53
295	12/30/08	FCX.GL	35671DAS4	10	89.50	\$757.00
296	12/30/08	FCX.GL	35671DAS4	15	89.50	\$1,135.50
297	12/30/08	FCX.GL	35671DAS4	10	89.50	\$757.00
298	12/31/08	FCX.GL	35671DAS4	12	91.25	\$210.29
299	01/12/09	YUM.GG	988498AC5	10	97.75	\$139.61
300	01/13/09	AMGN.GI	031162AJ9	15	96.50	\$617.66
301	01/13/09	AMGN.GI	031162AJ9	15	96.50	\$617.66
302	01/16/09	YUM.GG	988498AC5	10	104.13	\$545.17
303	01/20/09	AMGN.GI	031162AJ9	10	106.00	\$183.06
304	01/20/09	AMGN.GI	031162AJ9	10	106.00	\$183.06
305	01/20/09	AMGN.GI	031162AJ9	10	106.00	\$183.06
306	03/10/09	HD.GJ	437076AR3	10	88.00	\$775.00
307	03/16/09	MAR.GS	571903AH6	10	97.30	\$942.00
308	03/17/09	MAR.GS	571903AH6	10	97.30	\$942.00
309	03/18/09	BAC.NA	06050XDC4	18	40.50	\$2,250.00
310	03/19/09	BAC.NA	06050XDC4	18	65.50	\$2,250.00
311	03/19/09	HD.GJ	437076AR3	10	101.25	\$68.38
312	05/01/09	MAR.GS	571903AH6	15	86.00	\$840.75
313	06/24/09	GE.HBO	36962G2G8	10	92.50	\$262.15
314	07/06/09	BAC.HMC	59018YVV0	50	96.25	\$1,125.00
315	07/13/09	GE.HBO	36962G2G8	10	101.80	\$121.35
316	07/14/09	WYE.GG	983024AA8	40	102.75	\$1,138.38
317	07/16/09	VZ.RW	92343VAQ7	10	115.25	\$622.36
318	07/17/09	RAI.GP	761713AU0	20	101.91	\$980.69
319	08/12/09	HUM.GD	444859AY8	60	101.50	\$2,283.75
320	08/12/09	HUM.GD	444859AY8	40	101.50	\$1,522.50
321	08/12/09	HUM.GD	444859AY8	30	101.50	\$1,141.88
322	08/12/09	HUM.GD	444859AY8	25	101.50	\$951.56
323	08/12/09	HUM.GD	444859AY8	25	101.50	\$951.56
324	08/12/09	HUM.GD	444859AY8	25	101.50	\$951.56
325	08/12/09	SLM.GHC	78442FED6	20	83.75	\$389.00
326	08/21/09	FO.GH	349631AK7	39	93.00	\$1,376.70
327	09/16/09	SU.GD	86722TAA0	40	99.50	\$782.00
328	09/16/09	FCX.GL	35671DAS4	100	104.00	\$1,518.13
329	09/17/09	KLAC.GA	482480AA8	60	99.00	\$2,454.65
330	09/17/09	KLAC.GA	482480AA8	46	99.00	\$1,881.90
331	09/17/09	KLAC.GA	482480AA8	20	99.00	\$818.22
332	09/17/09	DOW.LG	260543BV4	80	95.25	\$1,024.00
333	09/17/09	DOW.LG	260543BV4	16	95.25	\$204.80
334	09/17/09	DOW.LG	260543BV4	14	95.25	\$179.20
335	09/17/09	DOW.LG	260543BV4	10	95.25	\$128.00
336	09/17/09	DOW.LG	260543BV4	26	95.25	\$332.80

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
337	09/21/09	GE.GO	36158FAD2	70	91.50	\$7,709.10
338	09/21/09	BBY.GG	086516AJ0	25	99.63	\$1,257.81
339	09/21/09	BBY.GG	086516AJ0	25	99.63	\$1,257.81
340	09/21/09	HUM.GC	444859AV4	50	93.75	\$1,882.50
341	09/21/09	HUM.GC	444859AV4	40	93.75	\$1,506.00
342	09/21/09	SBUX.GA	855244AC3	29	100.50	\$1,117.62
343	09/21/09	VIA.GK	925524AH3	50	90.00	\$1,474.27
344	09/21/09	BAC.GBY	060505BD5	90	96.25	\$2,774.98
345	09/21/09	SBC.OB	78387GAP8	50	103.13	\$1,445.77
346	09/21/09	SBC.OB	78387GAP8	29	103.13	\$838.55
347	09/21/09	HIG.QK	416515AV6	50	88.50	\$791.10
348	09/25/09	GS.VS	38143YAC7	60	93.50	\$2,623.53
349	09/25/09	VZ.RJ	92343VAC8	50	103.25	\$1,668.43
350	09/25/09	VZ.NH	92344GAT3	30	108.13	\$1,017.24
351	09/25/09	MET.GZ	59156RAJ7	35	103.50	\$1,008.00
352	09/28/09	HUM.GC	444859AV4	15	104.50	\$204.88
353	09/28/09	HUM.GC	444859AV4	10	104.50	\$136.59
354	09/28/09	HUM.GC	444859AV4	10	104.50	\$136.59
355	09/28/09	HUM.GC	444859AV4	15	104.50	\$204.88
356	09/29/09	HUM.GC	444859AV4	15	104.50	\$287.85
357	09/30/09	HUM.GC	444859AV4	10	104.50	\$218.80
358	09/30/09	HUM.GC	444859AV4	15	104.50	\$328.20
359	09/30/09	FCX.GL	35671DAS4	6	109.95	\$80.88
360	10/01/09	FCX.GL	35671DAS4	10	109.88	\$162.53
361	10/06/09	FCX.GL	35671DAS4	8	109.88	\$78.86
362	10/06/09	FCX.GL	35671DAS4	8	109.88	\$78.86
363	10/06/09	FCX.GL	35671DAS4	8	109.88	\$78.86
364	04/01/10	GS.WO	38141GEV2	15	102.50	\$345.16
365	04/05/10	SLE.GF	803111AK9	25	102.50	\$493.51
366	04/09/10	HD.GJ	437076AR3	10	103.75	\$244.68
367	04/09/10	HD.GJ	437076AR3	10	103.75	\$244.68
368	04/09/10	VZ.MX	92344TAA6	15	102.25	\$237.86
369	04/26/10	CAT.GIR	14912L2R1	15	102.13	\$372.15
370	04/26/10	CAT.GIR	14912L2R1	15	102.13	\$339.06
371	04/26/10	COST.GF	22160KAC9	15	107.25	\$283.64
372	04/26/10	COST.GF	22160KAC9	10	107.25	\$189.10
373	05/05/10	BBV.HH	P1R23DAA4	40	104.75	\$1,706.00
374	05/05/10	BBV.HH	P1R23DAA4	20	104.75	\$853.00
375	05/05/10	BBV.HH	P1R23DAA4	10	104.75	\$401.13
376	05/05/10	BBV.HH	P1R23DAA4	10	104.75	\$401.13
377	05/05/10	BBV.HH	P1R23DAA4	10	104.75	\$401.13
378	05/05/10	BBV.HH	P1R23DAA4	10	104.75	\$401.13
379	05/05/10	BBV.HH	P1R23DAA4	10	104.75	\$401.13
380	05/05/10	BBV.HH	P1R23DAA4	10	104.75	\$388.44
381	05/05/10	BBV.HH	P1R23DAA4	10	104.75	\$388.44
382	05/05/10	AXP.IN	025816AQ2	20	102.25	\$542.71
383	05/06/10	BBV.HH	P1R23DAA4	10	104.75	\$454.92
384	05/06/10	BBV.HH	P1R23DAA4	15	104.75	\$682.38

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
385	05/06/10	BBV.HH	P1R23DAA4	10	104.75	\$454.92
386	05/06/10	BBV.HH	P1R23DAA4	10	104.75	\$454.92
387	05/06/10	BBV.HH	P1R23DAA4	10	104.75	\$454.92
388	05/07/10	BBV.HH	P1R23DAA4	10	104.75	\$578.75
389	05/07/10	BBV.HH	P1R23DAA4	20	104.75	\$1,157.50
390	05/07/10	BBV.HH	P1R23DAA4	10	104.75	\$578.75
391	05/07/10	BBV.HH	P1R23DAA4	15	104.75	\$868.13
392	05/07/10	BBV.HH	P1R23DAA4	10	104.75	\$578.75
393	05/07/10	BBV.HH	P1R23DAA4	15	104.75	\$868.13
394	05/07/10	BBV.HH	P1R23DAA4	15	104.75	\$868.13
395	05/07/10	RIO.GU	767201AH9	10	119.25	\$289.00
396	05/07/10	RIO.GU	767201AH9	10	119.25	\$289.00
397	05/07/10	RIO.GU	767201AH9	15	119.25	\$433.50
398	05/07/10	RIO.GU	767201AH9	10	119.25	\$289.00
399	05/07/10	RIO.GU	767201AH9	10	119.25	\$289.00
400	05/07/10	RIO.GU	767201AH9	15	119.25	\$433.50
401	05/07/10	RIO.GU	767201AH9	10	119.25	\$289.00
402	05/07/10	RIO.GU	767201AH9	15	119.25	\$433.50
403	05/07/10	RIO.GU	767201AH9	15	119.25	\$433.50
404	05/07/10	RIO.GU	767201AH9	15	119.25	\$433.50
405	05/07/10	RIO.GU	767201AH9	15	119.25	\$433.50
406	05/07/10	RIO.GU	767201AH9	25	119.25	\$722.50
407	05/07/10	RIO.GU	767201AH9	20	119.25	\$578.00
408	05/10/10	BBV.HH	P1R23DAA4	10	104.75	\$160.06
409	05/10/10	BBV.HH	P1R23DAA4	15	104.75	\$240.09
410	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
411	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
412	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
413	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
414	05/11/10	BBV.HH	P1R23DAA4	25	104.75	\$431.88
415	05/11/10	BBV.HH	P1R23DAA4	13	104.75	\$224.58
416	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
417	05/11/10	BBV.HH	P1R23DAA4	12	104.75	\$207.30
418	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$96.63
419	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$96.63
420	05/11/10	BBV.HH	P1R23DAA4	10	104.75	\$96.63
421	05/11/10	BBV.HH	P1R23DAA4	12	104.75	\$115.95
422	05/12/10	SLE.GF	803111AK9	14	102.50	\$317.73
423	05/12/10	KFT.GD	50075NAB0	15	102.25	\$309.82
424	05/12/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
425	05/12/10	BBV.HH	P1R23DAA4	20	104.75	\$345.50
426	05/12/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
427	05/12/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
428	05/12/10	BBV.HH	P1R23DAA4	10	104.75	\$172.75
429	05/12/10	BBV.HH	P1R23DAA4	15	104.75	\$259.13
430	05/13/10	KFT.GD	50075NAB0	9	102.25	\$173.21
431	05/13/10	KFT.GD	50075NAB0	10	102.25	\$192.46
432	05/13/10	JNJ.GL	478160AM6	15	102.75	\$286.23

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
433	05/13/10	GIL.JM	370334BB9	10	108.13	\$193.69
434	05/13/10	GIL.JM	370334BB9	13	108.13	\$251.80
435	05/13/10	HD.GJ	437076AR3	15	105.00	\$269.06
436	05/13/10	HD.GJ	437076AR3	10	105.00	\$179.37
437	05/13/10	HD.GJ	437076AR3	20	105.00	\$358.74
438	05/13/10	BUD.HA	035229CP6	20	101.75	\$320.03
439	05/13/10	DIS.HY	25468PCE4	10	109.75	\$170.28
440	05/13/10	DIS.HY	25468PCE4	10	109.75	\$170.28
441	05/17/10	BBV.HH	P1R23DAA4	10	104.75	\$294.55
442	05/17/10	BBV.HH	P1R23DAA4	10	104.75	\$294.55
443	05/17/10	BBV.HH	P1R23DAA4	10	104.75	\$294.55
444	05/17/10	BBV.HH	P1R23DAA4	10	104.75	\$294.55
445	05/17/10	CTL.GY	156700AJ5	20	97.75	\$507.36
446	05/18/10	BBV.HH	P1R23DAA4	10	104.75	\$299.63
447	05/18/10	BBV.HH	P1R23DAA4	15	104.75	\$449.44
448	05/18/10	CTL.GY	156700AJ5	35	97.75	\$849.26
449	05/19/10	BBV.HH	P1R23DAA4	12	104.75	\$402.18
450	05/19/10	BBV.HH	P1R23DAA4	10	104.75	\$335.15
451	05/19/10	BBV.HH	P1R23DAA4	10	104.75	\$335.15
452	05/19/10	BBV.HH	P1R23DAA4	15	104.75	\$502.73
453	05/19/10	SBUX.GA	855244AC3	70	107.00	\$1,386.28
454	05/19/10	SBUX.GA	855244AC3	29	107.00	\$574.32
455	05/19/10	SBUX.GA	855244AC3	10	107.00	\$198.04
456	05/19/10	SBUX.GA	855244AC3	10	107.00	\$198.04
457	05/19/10	SBUX.GA	855244AC3	30	107.00	\$594.12
458	05/19/10	SBUX.GA	855244AC3	10	107.00	\$198.04
459	05/21/10	SBUX.GA	855244AC3	12	107.00	\$327.48
460	05/21/10	SBUX.GA	855244AC3	15	107.00	\$409.35
461	05/21/10	SBUX.GA	855244AC3	8	107.00	\$218.32
462	05/21/10	SBUX.GA	855244AC3	15	107.00	\$409.35
463	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
464	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
465	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
466	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
467	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
468	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
469	05/21/10	SBUX.GA	855244AC3	20	107.00	\$545.80
470	05/21/10	SBUX.GA	855244AC3	15	107.00	\$409.35
471	05/21/10	SBUX.GA	855244AC3	15	107.00	\$409.35
472	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
473	05/21/10	SBUX.GA	855244AC3	12	107.00	\$327.48
474	05/21/10	SBUX.GA	855244AC3	15	107.00	\$409.35
475	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
476	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
477	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
478	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
479	05/21/10	SBUX.GA	855244AC3	25	107.00	\$682.25
480	05/21/10	SBUX.GA	855244AC3	12	107.00	\$327.48

Attachment A

No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
481	05/21/10	SBUX.GA	855244AC3	15	107.00	\$409.35
482	05/21/10	SBUX.GA	855244AC3	10	107.00	\$272.90
483	05/21/10	SBUX.GA	855244AC3	15	107.00	\$409.35
484	05/27/10	KFT.GD	50075NAB0	15	102.00	\$257.19
485	06/01/10	TEVA.GK	88163VAC3	200	108.25	\$5,721.91
486	06/01/10	TEVA.GK	88163VAC3	15	108.25	\$429.14
487	06/01/10	TEVA.GK	88163VAC3	15	108.25	\$429.14
488	06/01/10	TEVA.GK	88163VAC3	15	108.25	\$429.14
489	06/01/10	TEVA.GK	88163VAC3	20	108.25	\$572.19
490	06/01/10	TEVA.GK	88163VAC3	10	108.25	\$247.19
491	06/01/10	TEVA.GK	88163VAC3	20	108.25	\$494.38
492	06/01/10	TEVA.GK	88163VAC3	15	108.25	\$370.78
493	06/02/10	COST.GF	22160KAC9	15	107.50	\$379.41
494	06/03/10	COST.GF	22160KAC9	5	107.50	\$115.24
495	06/03/10	COST.GF	22160KAC9	15	107.50	\$345.73
496	06/03/10	COST.GF	22160KAC9	5	107.50	\$115.24
497	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
498	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
499	06/03/10	COST.GF	22160KAC9	20	107.50	\$460.97
500	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
501	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
502	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
503	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
504	06/03/10	COST.GF	22160KAC9	15	107.50	\$345.73
505	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
506	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
507	06/03/10	COST.GF	22160KAC9	10	107.50	\$230.48
508	06/04/10	AA.GH	013817AF8	14	100.25	\$295.57
509	06/07/10	MO.GZ	718172AA7	14	104.75	\$296.46
510	06/07/10	FO.GH	349631AK7	10	101.25	\$196.62
511	06/07/10	FO.GH	349631AK7	10	101.25	\$196.62
512	06/07/10	FO.GH	349631AK7	25	101.25	\$491.55
513	06/07/10	FO.GH	349631AK7	20	101.25	\$393.24
514	06/07/10	FO.GH	349631AK7	10	101.25	\$196.62
515	06/07/10	UNH.GQ	91324PAQ5	14	104.50	\$267.61
516	06/07/10	UNH.GQ	91324PAQ5	12	104.50	\$229.38
517	06/07/10	UNH.GQ	91324PAQ5	9	104.50	\$172.04
518	06/07/10	UNH.GQ	91324PAQ5	65	104.50	\$1,242.49
519	06/07/10	UNH.GQ	91324PAQ5	10	104.50	\$191.15
520	06/07/10	UNH.GQ	91324PAQ5	20	104.50	\$382.30
521	06/07/10	WFC.OZ	929903DT6	14	104.75	\$242.96
522	06/08/10	GIL.JM	370334BB9	10	109.13	\$287.44
523	06/08/10	CSX.PM	126408GJ6	20	105.75	\$402.19
524	06/10/10	AMGN.GI	031162AJ9	15	106.00	\$248.19
525	06/11/10	BUD.HA	035229CP6	15	102.13	\$265.18
526	06/14/10	CLX.GE	189054AF6	25	104.50	\$810.07
527	06/14/10	ORCL.GH	68402LAC8	10	107.00	\$306.09
528	06/14/10	CLX.GE	189054AF6	10	104.75	\$299.03

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No.	Trade Date	Issue	CUSIP	Quantity	Price	Restitution
529	06/14/10	CCE.GR	191219BJ2	20	102.00	\$424.87
530	06/17/10	AXP.LX	0258M0CY3	10	108.00	\$313.76
531	06/18/10	AXP.LX	0258M0CY3	5	108.00	\$150.62
532	06/18/10	AXP.LX	0258M0CY3	5	108.00	\$150.62
533	06/18/10	AXP.LX	0258M0CY3	6	108.00	\$180.75
534	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
535	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
536	06/18/10	AXP.LX	0258M0CY3	5	108.00	\$150.62
537	06/18/10	AXP.LX	0258M0CY3	15	108.00	\$451.87
538	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
539	06/18/10	AXP.LX	0258M0CY3	12	108.00	\$361.49
540	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
541	06/18/10	AXP.LX	0258M0CY3	20	108.00	\$602.49
542	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
543	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
544	06/18/10	AXP.LX	0258M0CY3	13	108.00	\$391.62
545	06/18/10	AXP.LX	0258M0CY3	12	108.00	\$361.49
546	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
547	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
548	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
549	06/18/10	AXP.LX	0258M0CY3	10	108.00	\$301.25
550	06/18/10	BBY.GG	086516AJ0	15	106.00	\$418.40
551	06/18/10	HD.GJ	437076AR3	30	104.75	\$686.99
552	06/23/10	ADM.GT	039483AY8	15	108.25	\$341.38
553	06/24/10	GIS.GD	370334AS3	15	104.00	\$273.23
554	06/24/10	GIS.GD	370334AS3	12	104.00	\$218.58
555	06/24/10	GIS.GD	370334AS3	10	104.00	\$182.15
556	06/24/10	GIS.GD	370334AS3	10	104.00	\$182.15
557	06/24/10	GIS.GD	370334AS3	10	104.00	\$182.15
558	06/24/10	GIS.GD	370334AS3	15	104.00	\$273.23
559	06/24/10	GIS.GD	370334AS3	10	104.00	\$182.15
560	06/24/10	GIS.GD	370334AS3	15	104.00	\$273.23
561	06/24/10	GIS.GD	370334AS3	10	104.00	\$182.15
562	06/25/10	UNH.GQ	91324PAQ5	15	104.00	\$356.70
563	06/29/10	ORCL.GH	68402LAC8	15	110.00	\$290.01
	TOTAL					\$353,319.05