

FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20080163813-01

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

RE: Deutsche Bank Securities Inc., Respondent
Broker-Dealer
CRD No. 2525

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Deutsche Bank Securities 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 became a member of FINRA on March 16, 1940, and its registration remains in effect.

RELEVANT DISCIPLINARY HISTORY

On September 28, 2007, an AWC became final wherein the firm was censured and fined \$20,000 for violations of NASD Rules 6230(a) and 2110.

On June 26, 2008, an AWC became final wherein the firm was censured and fined \$15,000 for violations of NASD Rules 6130(b), 4632(a) and 6420(a).

On February 5, 2009, an AWC became final wherein the firm was censured and fined \$43,000, including \$10,000 for violations of NASD Rule 6230(a), \$10,000 for violations of NASD Rule 6130(g), \$10,000 for violations of Municipal Securities Rulemaking Board ("MSRB") Rule G-14 and \$3,000 for violations of SEC Rule 10b-10.

20080163813 (Inc. 20090169990, 20090186450, 20090193329, 20090198606, 20090201042, 20090201043, 20090205149, 20100234339, 20100231619, 20100231673 and 20100215910).

SUMMARY

In connection with matters 20080163813, 20090193329, 20090198606 and 20100234339, the Trade Reporting and Compliance Engine ("TRACE") Corporate Bonds Team of FINRA's Department of Market Regulation reviewed the firm's reporting of transactions in TRACE-eligible securities during the periods July 1, 2007 through September 30, 2007, April 1, 2009 through June 30, 2009, July 1, 2008 through September 30, 2008, and April 1, 2009 through June 30, 2009, respectively.

In connection with matters 20090169990 and 20100215910, the staff of FINRA's Department of Market Regulation conducted the firm's Trading and Market-Making Surveillance ("TMMS") examinations for 2009 and 2010, respectively. For the 2009 examination, the TMMS staff reviewed the items listed in Exhibit 1 for trade dates April 15 and 16, 2009; and, for the 2010 examination, the TMMS staff reviewed the items listed in Exhibit 2 for trade dates July 28 and 29, 2010.

In connection with matters 20090186450 and 20090205149, the Municipal Securities Team of FINRA's Department of Market Regulation reviewed the firm's reporting of municipal securities transactions to the Real-time Transaction Reporting System ("RTRS") during the period January 1, 2009 through March 31, 2009, and July 1, 2009 through September 30, 2009, respectively.

In connection with matters 20090201042, 20100231619 and 201000231673, the Trade Reporting Section of FINRA's Department of Market Regulation reviewed the firm's trade reporting of equity transactions during the periods May 1, 2009 through August 31, 2009, January 1, 2010 through April 30, 2010, and January 1, 2010 through April 30, 2010, respectively.

In connection with matter 20090201043, the OTC Compliance Team of FINRA's Department of Market Regulation reviewed the firm's compliance with requirements regarding trading during a trading halt during the period July 1, 2008 through December 31, 2008.

FACTS AND VIOLATIVE CONDUCT

TRACE Matters 20080163813

1. During the period reviewed, the firm failed to report to TRACE the correct contra-party's identifier for 164 transactions in TRACE-eligible securities. These transactions constituted approximately 12 percent of the inter-dealer transactions

20080163813 (Inc. 20090169990, 20090186450, 20090193329, 20090198606, 20090201042, 20090201043, 20090205149, 20100234339, 20100231619, 20100231673 and 20100215910).

in TRACE-eligible securities that the firm reported to TRACE during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 6230(c)(6).

2. During the period reviewed, the firm failed to report to TRACE nine transactions in TRACE-eligible securities that it was required to report. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 6230(b).

20090193329

3. During the period reviewed, the firm failed to report to TRACE 100 transactions in TRACE-eligible securities within 15 minutes of the time of execution. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.
4. During the period reviewed, the firm failed to report to TRACE the correct time of trade execution for 100 transactions in TRACE-eligible securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(c)(8).
5. The firm failed to show the correct time of execution on the memorandum of 97 brokerage orders. The conduct described in this paragraph constitutes separate and distinct violations of SEC Rule 17a-3 and NASD Rule 3110.

20090198606

6. During the period reviewed, the firm failed to report to TRACE the correct contra-party's identifier for 502 transactions in TRACE-eligible securities. These transactions constituted nine percent of the inter-dealer transactions in TRACE-eligible securities that the firm reported to TRACE during the period. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 6230(c)(6).
7. During the period reviewed, the firm failed to report to TRACE 25 transactions in TRACE-eligible securities that it was required to report. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rule 6230(b).

20100234339

8. During the period reviewed, the firm failed to report to TRACE the correct contra-party's identifier for 627 transactions in TRACE-eligible securities. These transactions constituted six percent of the inter-dealer transactions in TRACE-eligible securities (10,386) that the firm should have reported to TRACE during the period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(c)(6).
9. During the period reviewed, the firm failed to report to TRACE 56 transactions in TRACE-eligible securities that it was required to report. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(b)(1).

2009 TMMS Examination

20090169990

10. In 157 instances, the firm failed to disclose required information on customer confirmations. Specifically: a) in 69 occasions failed to provide written notification disclosing to its customer (i) its correct capacity; and (ii) compensation type in the transaction; b) in 85 occasions failed to provide written notification disclosing the correct compensation type in the transaction; and c) in three occasions failed to provide written notification disclosing to its customer that the transaction was executed at an average price. The conduct described in this paragraph constitutes separate and distinct violations of SEC Rule 10b-10.

2010 TMMS Examination

20100215910

11. In 34 instances, the firm failed to disclose required information on customer confirmations. Specifically: a) In 22 instances the confirmation failed to disclose that the price received was an average price; b) In four instances the confirmation incorrectly disclosed that a commission was charged for an order filled in a principal capacity. In addition, the confirmation incorrectly disclosed that the price received by the customer was an average price; c) In two instances, the firm incorrectly disclosed that a commission was charged for an order filled in a principal capacity; d) In one instance, the firm: (i) incorrectly disclosed that the price received by the customer was an average price, (ii) incorrectly disclosed that the firm acted in an agency capacity, and (iii)

incorrectly disclosed that a commission was charged for an order filled in a principal capacity; e) In two instances, the firm failed to disclose a principal capacity on the confirmation. In addition, the confirmation incorrectly disclosed that a commission was charged for an order filled in a principal capacity; f) In one instance, the firm: (i) incorrectly disclosed that a commission was charged for an order filled in a principal capacity, (ii) incorrectly disclosed that the price received by the customer was an average price, and (iii) firm failed to disclose market maker status; g) In one instance, the firm: (i) failed to disclose the correct capacity on the confirmation, (ii) failed to disclose that the price received was an average price and (iii) failed to disclose the correct average price on the confirmation; and h) In one instance, the confirmation failed to disclose that the price received was an average price. The conduct described in this paragraph constitutes separate and distinct violations of SEC Rule 10b-10.

MSRB Matters
20090186450

12. During the period reviewed, the firm failed to report the correct Time of Trade to the RTRS in 142 reports of transactions in municipal securities. The conduct described in this paragraph constitutes separate and distinct violations of MSRB Rule G-14(b)(ii).
13. During the period reviewed, the firm failed to report information regarding 141 purchase and sale transactions effected in municipal securities to the RTRS in the manner prescribed by Rule G-14 RTRS Procedures and the RTRS Users Manual. Specifically, the firm failed to report information about such transactions within 15 minutes of Time of Trade to an RTRS Portal. These transactions constituted four percent of the transactions that the firm reported to the RTRS during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of MSRB Rule G-14.
14. The firm failed to show the correct time of trade on the memorandum of 142 brokerage orders. The conduct described in this paragraph constitutes separate and distinct violations of MSRB Rule G-8.

20090205149

15. During the period reviewed, the firm failed to report the correct Time of Trade to the RTRS in 93 reports of transactions in municipal securities. The conduct described in this paragraph constitutes separate and distinct violations of MSRB Rule G-14(b)(ii).

16. During the period reviewed, the firm failed to report information regarding 88 purchase and sale transactions effected in municipal securities to the RTRS in the manner prescribed by Rule G-14 RTRS Procedures and the RTRS Users Manual. Specifically, the firm failed to report information about such transactions within 15 minutes of Time of Trade to an RTRS Portal. These transactions constituted 30 percent of the transactions that the firm, under MPID "DBKS," reported to the RTRS during the period. The conduct described in this paragraph constitutes separate and distinct violations of MSRB Rule G-14.
17. The firm failed to show the correct time of trade on the memorandum of 91 brokerage orders. The conduct described in this paragraph constitutes separate and distinct violations of MSRB Rule G-8.

Equity Trade Reporting Matters
20090201042

18. The firm failed to accept or decline in the FINRA/Nasdaq TRF or the OTC Trade Reporting Facility ("OTC TRF") 567 transactions in Reportable Securities within 20 minutes after execution, approximately 24 percent of all transactions that the firm had an obligation to accept or decline as the OEID during the period reviewed. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rules 7230A(b) or 7330(b).

20100231619

19. During the period reviewed, the firm failed, within 90 seconds after execution, to transmit to the OTC TRF 100 last sale reports of transactions in OTC Equity securities. The transactions constituted approximately seven percent of all OTC Equity transactions (1,457) reported by the firm to the OTC TRF during the period. 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.
20. During the period reviewed, the firm failed, within 90 seconds after execution, to transmit to the OTC TRF 15 last sale reports of transactions in OTC Equity securities and failed to designate to the OTC TRF such last sale reports as late. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(a).
21. During the period reviewed, the firm failed to report the correct time of execution to the OTC TRF in 11 late, last sale reports of transactions in OTC Equity

securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6622(a).

20100231673

22. During the period reviewed, the firm failed, within 90 seconds after execution, to transmit to the FINRA/Nasdaq TRF 12,644 last sale reports of transactions in designated securities. The transactions constituted approximately two percent of all NMS transactions (572,900) reported by the firm to the FINRA/Nasdaq TRF during the period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6380A.

23. During the period reviewed, the firm failed to report to the FINRA/Nasdaq TRF the correct time of execution for 2,420 transactions in Reportable Securities. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 7230A(d)(4).

Trading Halt
20090201043

24. During the period reviewed, the firm effected 11 transactions in seven securities while a trading halt was in effect with respect to each of the securities. The conduct described in this paragraph constitutes separate and distinct violations of NASD Rules 3340 and 2110 or FINRA Rule 2010.¹

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

- A censure.
- A fine of \$215,000 (comprised of \$100,000 for the TRACE reporting violations, \$42,500 for the equity trade reporting violations, \$37,500 for the violations of MSRB Rules G-8 and G-14, \$30,000 for the customer confirmation violations and \$5,000 for the trading halt violations).

The firm agrees to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. The firm 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 sanction(s) imposed in this matter.

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

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

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 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.

12/18/12
Date

Respondent
Deutsche Bank Securities Inc.

By: Joseph Polizzotto Robert E. Rice
Name: JOSEPH POLIZZOTTO / ROBERT E. RICE
Title: Managing Director / Managing Director

Reviewed by:

Attorney Name
Counsel for Respondent
Firm Name
Address
City/State/Zip
Phone Number

Accepted by FINRA:

2/5/13
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

2009 Market Regulation Examination Samples
Deutsche Bank Securities
Exam No. 20090169990

<u>Sample</u>	
<u>Size</u>	<u>Sample Description</u>
76	Sales reviewed for compliance with SEC Rule 200(g) long/short sale recording requirements
19	Short Sales reviewed for compliance with SEC Rule 203(b) security location requirements
0	Sales reviewed for compliance with SEC Rule 204 fail-to-deliver requirements
656	Sell trades reported to a TRF or OTCRF for compliance with sale indicator requirements, FINRA Rules 6182 or 6624
65	Sell orders entered into Nasdaq Exchange execution system for compliance with Nasdaq Rule 4755(a)(1)(A) long/short reporting requirements
65	Buy and Sell orders entered into Nasdaq Exchange execution system for compliance with Nasdaq Rule 4611 capacity reporting requirements
0	Sell orders entered into BATS Exchange execution system for compliance with BATS Rule 11.19 long/short reporting requirements
0	Limit orders for NMS securities in which the member acts as an exchange market maker for compliance with the display requirements of SEC Rules 602 and 604, and Nasdaq Rule 3390
85	Orders for compliance with best execution requirements of NASD Rule 2320
20	from the Customer Sales Review
0	Held orders from the Held Order Protection Review
16	Not Held orders from the Not Held Order Review
0	Order executed with a .PRP (Prior Reference Price) trade modifier
42	from the Additional Desk Review (Emerging Markets)
7	Customer orders in OTC equity securities for compliance with NASD Rule 3110(b) requirements to ascertain and document best interdealer market related to execution of orders
0	Orders for compliance with order protection requirements of NASD Rules 2110, IM-2110-2, 2111, and Nasdaq Rules 2110, IM-2110-2, and 2111
0	Open Limit orders to buy and/or open Stop orders to sell securities that traded ex-dividend for compliance with NASD Rule 3220 and Nasdaq Rule 4761
0	Order memoranda and Net Trading agreements for compliance with NASD Rule 2441 requirements
50	Orders in securities required to be submitted to OATS for compliance with FINRA Rules 7440 and 7450, and Nasdaq Rules 6954 and 6955 requirements
169	Customer confirmations prepared and maintained in connection with select samples for compliance with SEC Rule 10b-10

2009 Market Regulation Examination Samples
 Deutsche Bank Securities
 Exam No. 20090169990

<u>Sample Size</u>	<u>Sample Description</u>
25	Orders for NMS securities in which the Firm acts as a market center for compliance with SEC Rule 605 order classification requirements
2	Data sets published for Month Year monthly order execution report for compliance with SEC Rule 605 requirement to publish accurate data (a 'data set' encompasses all required statistical data for single security and order type/size category as described in SEC Rule 605)
3rd quarter 2009	Quarterly Routing Report for compliance with SEC Rule 606 requirements
15	CRD registration records for persons conducting and/or supervising Firm's trading and/or market making activities for compliance with NASD Rule Series 1020, 1030, 1040; Nasdaq Rule Series 1020, 1030, 1040; and BATS Rule 11.4
7	Customer orders in OTC equity securities for compliance with NASD Rule 3110(b) requirements to ascertain and document best interdealer market related to execution of orders
1	Disclosures to customers relating to trading in the Extended Hours session for compliance with FINRA Rule 2265 and Nasdaq Rule 4631
4124	Records prepared and maintained in connection with the above samples for compliance with SEC Rules 17a-3 and 17a-4, and NASD Rule 3110
2620	Trades reported to a TRF or OTCRF for compliance with FINRA Rules 6380A and 7230A or 6622 and 7330
All Provided	Member's "Regular & Rigorous" review procedures regarding order execution quality for compliance with NASD Rules 2320 and 3010
All Provided	Member's supervisory and operational policies and procedures and documentation evidencing execution of the policies and procedures for compliance with SEC Regulation NMS Rule 611
All Provided	Member's supervisory system, written supervisory procedures ("WSPs") and documentation evidencing execution of the WSPs for compliance with NASD Rule 3010, Nasdaq Rule 3010, or BATS Rule 5.1 requirements

2010 Market Regulation Examination Samples
 Deutsche Bank Securities Inc. ("DBAB")
 Exam No. 20100215910

Sample

<u>Size</u>	<u>Sample Description</u>
247	Sales reviewed for compliance with SEC Rule 200(g) long/short sale recording requirements
15	Short Sales reviewed for compliance with SEC Rule 203(b) security location requirements
0	Sales reviewed for compliance with SEC Rule 204 fail-to-deliver requirements
483	Sell trades reported to a TRF or OTCRF for compliance with sale indicator requirements, FINRA Rules 6182 or 6624
231	Sell orders entered into Nasdaq Exchange execution system for compliance with Nasdaq Rule 4755(a)(1)(A) long/short reporting requirements
306	Buy and Sell orders entered into Nasdaq Exchange execution system for compliance with Nasdaq Rule 4611 capacity reporting requirements
22	Sell orders entered into Nasdaq OMX BX execution system for compliance with Nasdaq OMX BX Rule 4755(a) long/short reporting requirements
93	Sell orders entered into BATS Exchange execution system for compliance with BATS Rule 11.19 long/short reporting requirements
0	Limit orders for NMS securities in which the member acts as an exchange market maker for compliance with the display requirements of SEC Rules 602 and 604, and Nasdaq Rule 3390
19	Orders for compliance with best execution requirements of NASD Rule 2320
0	Held orders from the Held Order Protection Review
10	Not Held orders from the Not Held Order Review
0	Order executed with a .PRP (Prior Reference Price) trade modifier
9	Customer orders in OTC equity securities for compliance with NASD Rule 3110(b) requirements to ascertain and document best interdealer market related to execution of orders
0	Orders for compliance with order protection requirements of NASD Rules 2110, IM-2110-2, 2111, and Nasdaq Rules 2110, IM-2110-2, and 2111
0	Open Limit orders to buy and/or open Stop orders to sell securities that traded ex-dividend for compliance with NASD Rule 3220 and Nasdaq Rule 4761
0	Order memoranda and Net Trading agreements for compliance with NASD Rule 2441 requirements
261	Orders in securities required to be submitted to OATS for compliance with FINRA Rules 7440 and 7450, and Nasdaq Rules 6954 and 6955 requirements
143	Customer confirmations prepared and maintained in connection with select samples for compliance with SEC Rule 10b-10

* unless otherwise noted

2010 Market Regulation Examination Samples
 Deutsche Bank Securities Inc. ("DBAB")
 Exam No. 20100215910

<u>Sample Size</u>	<u>Sample Description</u>
22	Orders for NMS securities in which the Firm acts as a market center for compliance with SEC Rule 605 order classification requirements
0	Data sets published for monthly order execution report for compliance with SEC Rule 605 requirement to publish accurate data (a 'data set' encompasses all required statistical data for single security and order type/size category as described in SEC Rule 605)
1	Quarterly Routing Report for compliance with SEC Rule 606 requirements
15	CRD registration records for persons conducting and/or supervising Firm's trading and/or market making activities for compliance with NASD Rule Series 1020, 1030, 1040; Nasdaq Rule Series 1020, 1030, 1040; and BATS Rule 11.4
9	Customer orders in OTC equity securities for compliance with NASD Rule 3110(b) requirements to ascertain and document best interdealer market related to execution of orders
1	Disclosures to customers relating to trading in the Extended Hours session for compliance with FINRA Rule 2265 and Nasdaq Rule 4631
352	Records prepared and maintained in connection with the above samples for compliance with SEC Rules 17a-3 and 17a-4, and NASD Rule 3110
803	Trades reported to a TRF or OTCRF for compliance with FINRA Rules 6380A and 7230A or 6622 and 7330
All Provided	Member's "Regular & Rigorous" review procedures regarding order execution quality for compliance with NASD Rules 2320 and 3010
All Provided	Member's supervisory and operational policies and procedures and documentation evidencing execution of the policies and procedures for compliance with SEC Regulation NMS Rule 611
All Provided	Member's supervisory system, written supervisory procedures ("WSPs") and documentation evidencing execution of the WSPs for compliance with NASD Rule 3010, Nasdaq Rule 3010, or BATS Rule 5.1 requirements
XX	Trading Halts declared during the on-site portion of the examination for which FINRA Staff observed the operation of the ATS.
XX	Trades reported to the ADF/TRACS for compliance with FINRA Rule 6282
XX	ADF orders and quotes accessed by other market participants for compliance with FINRA Rule 6250 requirements to submit Order and Order Response reports