

FINANCIAL INDUSTRY REGULATORY AUTHORITY

OFFICE OF HEARING OFFICERS

Department of Enforcement,

Complainant,

v.

Wood (Arthur W.) Company, Inc.
(BD No. 3798),

Respondent.

DISCIPLINARY PROCEEDING
No. 2011025444501

COMPLAINT

The Department of Enforcement (“Enforcement”) alleges:

SUMMARY

1. Between June 2008 and September 2011, Respondent Wood (Arthur W.) Company, Inc. (“WCI” or the “Firm”) failed to implement its anti-money laundering (“AML”) procedures. The Firm failed to detect and investigate red flags indicative of potentially suspicious activity, and failed to adequately respond to additional red flags presented to it by the Firm’s clearing firm (the “Clearing Firm”). WCI also failed to conduct adequate annual independent testing of its AML program for calendar years 2008 through 2011.
2. On or about January 14, 2009 through September 8, 2011, the Firm charged excessive commissions on equity transactions ranging from over 5% to as high as over 18% of the principal amount of each transaction. The Firm also failed to establish, maintain, and enforce a supervisory system that was reasonably designed to achieve compliance with rules related to the fairness of commissions on equity transactions.

3. From October 2010 through November 2011, the Firm prepared inaccurate net capital computations and failed to record accurately its expenses and liabilities in its books and records. In addition, on Thursday, June 30, 2011, the Firm's net capital declined to below 120% of the Firm's required minimum net capital, and the Firm failed to file a notice pursuant to Rule 17a-11(c)(3) promulgated under the Securities Exchange Act of 1934 (Exchange Act). Furthermore, on three dates between June 2012 and August 2012, WCI conducted a securities business while failing to maintain its required minimum net capital.

RESPONDENT AND JURISDICTION

4. WCI has been a FINRA member firm since on or about January 22, 1937. The Firm's principal office is located in Boston, MA. The Firm conducts a retail brokerage business.
5. WCI is currently a FINRA-registered firm subject to FINRA's disciplinary jurisdiction.

FIRST CAUSE OF ACTION FAILURE TO IMPLEMENT AML PROCEDURES (VIOLATION OF NASD CONDUCT RULES 3011 AND 2110 AND FINRA RULES 3310 AND 2010)

6. The Department realleges and incorporates by reference paragraphs 1 through 5 above.
7. FINRA Rule 3310(a) (previously NASD Conduct Rule 3011(a)) requires firms to establish and implement policies, procedures, and internal controls that can be reasonably expected to detect and cause the reporting of transactions required by the Bank Secrecy Act and the implementing regulations thereunder.
8. The Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 ("USA PATRIOT Act") and its implementing regulations require, *inter alia*, all United States broker-dealers to file with

the Financial Crimes Enforcement Network (“FinCEN”), a bureau of the U.S. Treasury Department, a Suspicious Activity Report (“SAR”) for certain suspicious transactions.

9. Specifically, a broker-dealer must file a SAR to report to FinCEN transactions that are either conducted or attempted to be conducted involving assets or funds of an aggregate value of at least \$5,000, if the broker-dealer knows or has reason to suspect that the transaction, among other things:
 - a. Involves funds derived from illegal activity or is intended or conducted in order to hide or disguise funds or assets derived from illegal activity as part of a plan to violate or evade any Federal law or regulation;
 - b. Has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the broker-dealer knows of no reasonable explanation for the transaction after examining the available facts, including the background and possible purpose of the transaction; and
 - c. Involves the use of the broker-dealer to facilitate the criminal activity.

31 C.F.R. § 1023.320(a)(2)(i), (iii), and (iv).

10. Broker-dealers are required to file SARs no later than 30 calendar days after they initially detect facts that may constitute a basis for such a filing. 31 C.F.R. § 1023.320(b)(3).
11. As part of their obligations, and as explained in Special NASD Notice to Members (NTM) 02-21, broker-dealers must develop and implement a written AML compliance program to monitor accounts for suspicious activity that includes identifying and investigating any “red flags” associated with customer account activity.

12. NTM 02-21 provides a list of “red flags” associated with customer account activities that may be considered signs of potentially suspicious activity that may require further investigation. Several of those red flags are set forth in greater detail below.
13. The presence of red flags such as those discussed in NTM 02-21 should prompt broker-dealers to conduct additional due diligence as part of their obligation to monitor and detect instances of suspicious activity occurring in customer accounts.
14. From approximately June 2008 through September 2011, WCI’s written AML policies and procedures required the Firm to monitor for potentially suspicious activity and red flags, to investigate potentially suspicious activity, and to report suspicious activity by filing a SAR, as appropriate. Although the Firm listed specific red flags in its AML procedures, it failed to have an adequate system to monitor for potentially suspicious activity and also failed to adequately detect and investigate those red flags when they were present.
15. From approximately June 2008 through September 2011, WCI failed to implement its written AML program to ensure compliance with the Bank Secrecy Act. The Firm did not identify and investigate potentially suspicious activity, even though many red flags identified in the Firm’s written AML procedures were present, such as:
 - a. the customer (or a person publicly associated with the customer) had a questionable background or was the subject of news reporting indicating possible criminal, civil or regulatory violations;
 - b. the customer exhibits unusual concern about the firm’s compliance with government reporting requirements and the firm’s AML policies; and

- c. the customer exhibits a lack of concern regarding risks, commissions, or other transaction costs.

Red Flags Raised by Activity in Accounts

- 16. Several individuals (“CE, AG and GE”) who opened accounts at the Firm through one of the Firm’s registered representatives, EQ, between August 2008 and August 2010 had criminal backgrounds and alleged ties to organized crime. Other customers of EQ, TH and MH, who opened accounts at or around the same time appeared to be closely connected to these individuals.
- 17. The activity in the aforementioned customers’ accounts raised numerous red flags indicative of potentially suspicious activity related to the deposit and liquidation of low-priced securities. In fact, these customers, all serviced by EQ, made up the vast majority of the Firm’s trading activity in low-priced securities, which represented a departure from the Firm’s typical business model. Several of EQ’s customers deposited large blocks of shares of the same low-priced securities at or around the same time. Subsequently, these clients would sell their shares, often in concert, through coordinated liquidating transactions as evidenced by e-mails between these clients detailing plans for buying and selling securities. EQ was included on some of those e-mails.
- 18. AG, CE, GE, and TM all deposited blocks of shares of Brite-Strike Tactical Illumination Products, Inc. stock (BSTK) into their Firm accounts in or around August 2008. The amounts of the deposits ranged from 25,000 shares to 2,000,000 shares.
- 19. The BSTK sales proceeds were sent out of the customers’ accounts, rather than reinvested. The majority of the sales were within one and fourteen days of the deposits.

The sales proceeds were either sent out by wire transfer to accounts in the names of the customers or by first-party checks.

20. The commissions on the sales of the BSTK stock were over 8%, for all of the customers except CE.
21. A similar pattern took place with respect to another penny stock, INVO Bioscience, Inc. (IVOB). AG, GE, TM, MH, and LVH deposited blocks of shares of IVOB into their Firm accounts between March 2009 and August 2010.¹ The amounts of the deposits ranged from 50,000 shares to 300,000 shares.
22. The proceeds from all of the sales of the IVOB stock were sent out of the accounts, rather than reinvested, the majority within one and fourteen days of the sales. The sale proceeds were either sent out by wire transfer to accounts in the names of the customers or through first-party checks.
23. The commissions paid by the customers on the sale of IVOB stock ranged between 5.7% and 9.8% of the principal amount.

Red Flags Regarding Customers' Backgrounds

24. The Firm failed to conduct additional due diligence into these clients in response to the ongoing potentially suspicious trading activity, which would have revealed their criminal and otherwise questionable backgrounds and pre-existing relationships with one another.
25. On or about August 5, 2008, Customer AG opened an account at the Firm through EQ. At the time the account was established, there were several publicly-available news articles related to AG's criminal background. AG had been indicted in February 2000 in

¹ Prior to 11/2/2009, IVOB was named Emys Salsa.

connection with activities related to organized crime. The articles detailed AG's criminal record related to the operation of an illegal gambling business.

26. On or about August 5, 2008, Customer GE also opened an account at the Firm through EQ. GE was named as a defendant in the same February 2000 indictment as AG. GE's WCI account-opening documents stated that he was a fraud examiner for the Bureau of Investigations at the Commonwealth of Massachusetts. There is no such Bureau. GE's account-opening documents also contained an invalid social security number.
27. On or about July 28, 2010, GE also opened a corporate account at the Firm through EQ on behalf of a limited liability company named LVH. GE claimed to be the President and sole owner of LVH.
28. On or about August 5, 2008, customer CE opened an account at the Firm through EQ. CE is GE's brother, and CE's account application indicated that he was a Managing Partner at LVH. CE once worked in the securities industry. He has a long disciplinary history. He was sanctioned by the Massachusetts Securities Division in 1998 for fraud, dishonest and unethical sales practices, and failure to obey a Consent Order. The Massachusetts Securities Division prohibited him from being registered in Massachusetts for ten years and ordered him to pay \$10,000. CE received numerous customer complaints involving, among other issues, material misrepresentations and omissions, churning, excessive trading, and unauthorized trading.
29. The Firm failed to detect and investigate red flags, including negative news associated with their clients, in reaction to ongoing potentially suspicious trading in these clients' accounts.

Communications between EQ and Customers on Firm E-mail

30. There were also several e-mails sent to EQ concerning activity in these customers' accounts that should have raised red flags indicative of potentially manipulative trading to the Firm. Given the multiple red flags that were present, the Firm should have reasonably conducted additional due diligence into these clients and the ongoing trading activity to assess whether it had a reporting obligation.
31. For example, on November 3, 2010, CE wrote to EQ asking "is it true that you can deposit up to 100,000 shares without scrutiny?"
32. On August 12, 2008, EQ e-mailed CE and said that he had sold 39,800 shares of BSTK at \$0.5481 and asked him if he should continue selling. On that same day, CE responded to EQ, "Let's wait for it to firm up over .50 again...he has lots of pr starting this week."
33. On April 28, 2009, CE wrote to EQ asking if another individual was "unloading." CE stated that, "I'm trying to get something going but someone is in the way. . ." EQ responded, "It's not him that is in the way someone is hitting it."
34. On April 30, 2009, CE wrote to EQ asking him to "move away from .51....I'm trying to get something going for next week."
35. On May 27, 2009, CE wrote to EQ saying, "...anyway your buddies . . . have lots of power... they worked WWAG weeks ago...went crazy on huge volume...they have 5 different websites and coordinate with many other svcs...IVOB within 10 days...at \$.10 it's a steal. i'm bidding .08 myself."
36. On June 16, 2009, CE wrote to EQ saying:
- Yes, I've been tweeting on my www.twitter.com page . . . check it out..FOLLOW ME...I nailed SPNG on 4/30 at .015 cents...hit .28 Friday on 560 mill shs volume..my latest pick was WNBD at .0095 hit .023 today...massive volume coming in..I am getting 25-30 new

followers per day that are all getting messages of IVOB...IVOB has 5 MAJOR events starting later today over the next two weeks, including Live TV interviews with CEO on FOX BUSINESS NEWS AND NECN.

37. On September 4, 2009, CE wrote to EQ stating “BSTK is in play...best get in today...it gets more expensive in coming days...call [AG].”

WCI's Clearing Firm Also Raised Concerns to the Firm Regarding EQ Accounts

38. In addition to the red flags noted above, WCI's Clearing Firm raised additional red flags to the Firm that should have caused the Firm to conduct an independent inquiry into the activity in its clients' accounts..
39. On March 11, 2009, the Clearing Firm sent a low-priced security inquiry regarding deposits in AG's account to WCI.
40. On July 2, 2010, the Clearing Firm sent a similar inquiry regarding the deposits of a low-priced security into MH's account to WCI.
41. On September 3, 2010, the Clearing Firm inquired to WCI regarding a stock certificate deposited by PL, another customer of EQ. The Clearing Firm questioned, among other things, how PL became a customer of EQ and what the future intentions were for the account.
42. On September 22, 2010, a Clearing Firm representative e-mailed the Firm stating that she was not comfortable with the activity in PL's account, that she was requesting the account be closed, and that no further business be conducted with the customer. The e-mail stated:

Our head of Compliance regarding [*sic*] the RR is that he is not permitted to open any other accounts . . . that would be potentially involved in low price securities unless some form of prior approval is obtained from [Clearing Firm's] AML unit. Furthermore, going forward in the future, my recommendation to our head of Compliance is that

your firm not be permitted to open any accounts intending to conduct low price security transactions unless there is a special circumstance and someone in [Clearing Firm's] Anti Money Launder[ing] Unit is contacted for prior approval with full and complete details.

43. On September 22, 2010, EQ attempted to open an account for an individual, CF. The next day, the Clearing Firm notified WCI that CF had been barred from the securities industry, and asked for information regarding the type of transactions that he wished to conduct. CF's account ultimately was not opened.
44. It was not until October 2010 that WCI finally began to express concerns to EQ regarding his customers' penny stock activities.
45. Nevertheless, the activity continued at the Firm. On or about November 15, 2010, LVH deposited 700,000 shares of a penny stock into its account. Despite the numerous red flags that were present, including the Clearing Firm's concerns beginning in March 2009, the activity was allowed to continue. In fact, the activity continued even after EQ had left WCI in January 2011. One of the Firm's registered principals, DM, took over EQ's accounts, including the accounts discussed above.
46. On or about March 31, 2011, GE deposited 500,000 shares of a penny stock into his account. DM was the registered representative listed on the account at that time.
47. On or about September 29, 2011, GE was indicted on drug trafficking charges.
48. Between June 2008 and September 2011, the Firm's written supervisory procedures specifically listed the following red flags indicative of potentially suspicious activity:
 - a. The customer, or a person publicly associated with the customer, has a questionable background or is the subject of news reports indicating possible criminal, civil or regulatory violations.

- b. The customer exhibits unusual concern about the firm's compliance with government reporting requirements and the firm's AML policies.
 - c. The customer exhibits a lack of concern regarding risks, commissions or other transaction costs.
 - d. The customer, for no apparent reason or in conjunction with other red flags, engages in transactions involving certain types of securities such as penny stocks that, although legitimate, have been used in connection with fraudulent schemes and money laundering activity.
49. The activity discussed in paragraphs 16 through 46 above constituted activity that WCI was required to investigate and, if appropriate, report.
50. Despite the Firm's procedures requiring additional due diligence to ensure the legitimacy of the customer's activity in the presence of red flags, the Firm took no action to investigate the suspicious activity by EQ's customers. As a result, the Firm failed to implement and enforce its AML program.
51. By virtue of this conduct, WCI violated NASD Conduct Rules 3011(a) (for misconduct before January 1, 2010) and 2110 (for misconduct before December 15, 2008) and FINRA Rules 3310(a) (for misconduct after December 31, 2009) and 2010 (for misconduct after December 14, 2008).

**SECOND CAUSE OF ACTION
(FAILURE TO CONDUCT ADEQUATE INDEPENDENT AML TESTS)
(VIOLATION OF NASD CONDUCT RULES 3011(c) AND
2110 AND FINRA RULES 3310(c) AND 2010)**

52. The Department realleges and incorporates by reference paragraphs 1 through 51 above.

53. FINRA Rule 3310(c) (previously NASD Rule 3011(c)) requires firms that execute transactions on behalf of customers to conduct an annual independent test of their AML compliance programs on a calendar-year basis.
54. FINRA Rule 3310.01(c)(1) provides that the independent test may not be conducted by a person who performs the functions being tested.
55. During the calendar years 2008 through 2011, PFT conducted the Firm's annual independent AML test. PFT, however, was not independent because he performed some of the functions being tested. He was responsible for approving account applications, and therefore was required to ensure that the Firm's Customer Identification Program (CIP) procedures were followed. Because of these responsibilities, PFT was not independent for the purpose of performing the Firm's annual AML independent test.
56. In addition, WCI's AML tests were substantively inadequate. The tests evidence only a cursory review of AML procedures. The Firm did not test the adequacy of its suspicious activity monitoring program or Customer Identification Program. In addition, the 2008 through 2011 AML tests wrongfully asserted that that the Firm was not required to review 314(a) requests made by FinCEN.
57. The Firm failed to conduct tests of its AML program for calendar years 2008 through 2011 that were adequate and independent. As a result of the foregoing conduct, WCI violated NASD Conduct Rules 3011(c) (for misconduct before January 1, 2010) and 2110 (for misconduct before December 15, 2008) and FINRA Rules 3310(c) (for misconduct after December 31, 2009) and 2010 (for misconduct after December 14, 2008).

**THIRD CAUSE OF ACTION
EXCESSIVE COMMISSIONS
(VIOLATION OF NASD CONDUCT RULE 2440,
IM-2440-1, AND FINRA RULE 2010)**

58. The Department realleges and incorporates by reference paragraphs 1 through 57 above.
59. Between on or about January 14, 2009 through September 8, 2011, WCI charged customers commissions that were not fair and reasonable, in consideration of the factors set forth in IM-2240-1(b).
60. The Firm charged unreasonable and unfair commissions on 367 equity security transactions, as shown on Schedule A, attached hereto and incorporated herein by reference. The amount of the commissions ranged from over 5% to as high as over 18% of the principal amount of each transaction. The total amount of the excessive commissions charged on these transactions (i.e., the total amount charged above 5%) was \$40,229.28.
61. The high commission amount was not justified. The Firm did not provide services warranting extraordinary commissions. The majority of the transactions at issue involved low-priced securities, but the Firm's expenses in executing these customer orders were not extraordinary.
62. During the relevant period, WCI used a default commission schedule provided by the Firm's former clearing firm to determine commissions that would be charged to customers on equity transactions. The commission schedule used by WCI produced commissions that were not fair and reasonable.
63. By reason of the foregoing, WCI violated NASD Conduct Rule 2440, IM-2440-1, and FINRA Rule 2010.

**FOURTH CAUSE OF ACTION
SUPERVISORY DEFICIENCIES
(VIOLATION OF NASD CONDUCT RULE 3010
AND FINRA RULE 2010)**

64. The Department realleges and incorporates by reference paragraphs 1 through 63 above.
65. NASD Conduct Rule 3010(a) requires member firms to “establish and maintain a system . . . reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable NASD Rules.” NASD Conduct Rule 3010(b) requires member firms to “establish, maintain, and enforce written procedures . . . reasonably designed to achieve compliance with applicable securities laws and regulations, and with the applicable Rules of NASD.”
66. From January 2009 through September 2011, WCI failed to establish, maintain, and enforce a supervisory system, including written supervisory procedures (WSPs), that was reasonably designed to achieve compliance with the applicable securities laws and regulations and NASD and FINRA rules concerning the charging of fair and reasonable commissions.
67. Instead of conducting a reasonableness review of its commissions on equity transactions, WCI relied on a default commission schedule. No one at the Firm conducted an evaluation of the factors that were relevant to the amount of commissions charged, as set forth in NASD Conduct Rule 2440 and IM-2440-1.
68. The Firm’s WSPs required a reasonableness review of commissions to be conducted on transactions made at the Firm, including a review of the expense of executing and filling the customer order, the value of the services rendered by the broker-dealer, the amount of any other compensation received by the broker-dealer in connection with the transaction, and other relevant factors. The Firm, however, did not conduct the reviews. As a result,

the Firm failed to detect the aforementioned excessive commissions that it charged to its customers.

69. By virtue of the foregoing, WCI violated NASD Conduct Rule 3010 and FINRA Rule 2010.

**FIFTH CAUSE OF ACTION
(INACCURATE BOOKS AND RECORDS)
(WILLFUL VIOLATION OF SECTION 17(a) OF THE EXCHANGE ACT AND RULE
17a-3 THEREUNDER, AND VIOLATION OF NASD CONDUCT RULE 3110
AND FINRA RULES 4511 AND 2010)**

70. The Department realleges and incorporates by reference paragraphs 1 through 69 above.
71. From October 2010 through November 2011, WCI failed to ensure that its financial books and records accurately reflected all assets, liabilities, and expenses of the Firm. This caused WCI's records and net capital computations for those records to be inaccurate.
72. These inaccuracies arose from WCI's agreement with another member firm, DF&C, to purchase a substantial portion of that firm's business. On about October 18, 2000, WCI and DF&C signed a Letter of Understanding (LOU) regarding the arrangement.
73. The LOU established a quarterly payment schedule for WCI's payments to DF&C. DF&C also sent invoices to WCI pursuant to the LOU.
74. WCI failed to take into account in its net capital computations payments that it owed to DF&C pursuant to the LOU. As a result, the Firm prepared inaccurate net capital computations between October 2010 and November 2011.
75. By virtue of this conduct, WCI violated NASD Conduct Rule 3110 (for misconduct before December 5, 2011) and FINRA Rules 4511 (for conduct after December 4, 2011)

and 2010 and willfully violated Section 17(a) of the Exchange Act and Rule 17a-3 thereunder.

**SIXTH CAUSE OF ACTION
(FAILURE TO FILE NET CAPITAL NOTICE)
(VIOLATION OF FINRA RULE 2010 AND WILLFUL VIOLATION
OF SECTION 17(a) OF THE EXCHANGE ACT AND RULE 17a-11 THEREUNDER)**

- 76. The Department realleges and incorporates by reference paragraphs 1 through 75 above.
- 77. On or about June 30, 2011, the Firm's net capital declined to below 120% of the Firm's required minimum net capital. The Firm failed to file a notice of this event pursuant to Exchange Act Rule 17a-11(c)(3).
- 78. By virtue of this conduct, WCI violated FINRA Rule 2010 and willfully violated Section 17(a) of the Exchange Act and Rule 17a-11 thereunder.

**SEVENTH CAUSE OF ACTION
(NET CAPITAL DEFICIENCIES)
(VIOLATION OF FINRA RULE 2010 AND WILLFUL VIOLATION
OF SECTION 15(c) OF THE EXCHANGE ACT
AND RULE 15c3-1 THEREUNDER)**

- 79. The Department realleges and incorporates by reference paragraphs 1 through 78 above.
- 80. On Friday, June 29, 2012, the Firm's minimum required net capital was the greater of \$5,000 or \$11,093, pursuant to SEC Rule 15c3-1(a)(1)(i) (the Aggregate Indebtedness Standard). The Firm's actual net capital was \$10,012, a deficiency of \$1,081.
- 81. The Firm conducted a securities business while net capital deficient on June 29, 2012.
- 82. On Tuesday, July 31, 2012, the Firm's minimum required net capital was the greater of \$5,000 or \$10,387, pursuant to the Aggregate Indebtedness Standard. On this date, the Firm's actual net capital was \$1,653, a deficiency of \$8,734.
- 83. The Firm conducted a securities business while net capital deficient on July 31, 2012.

84. On Friday, August 31, 2012, the Firm's minimum required net capital was the greater of \$5,000 or \$12,478, pursuant to the Aggregate Indebtedness Standard. On this date, the Firm's actual net capital was \$2,501, a deficiency of \$9,977.
85. The Firm conducted a securities business while net capital deficient on August 31, 2012.
86. These deficiencies arose because the Firm improperly classified funds that were jointly held in a brokerage account at the Firm belonging to one of the Firm's principals and her mother as an allowable asset.
87. By conducting a securities business while net capital deficient on the aforementioned dates, WCI violated FINRA Rule 2010 and willfully violated Section 15(c) of the Exchange Act and Rule 15c3-1 thereunder.

RELIEF REQUESTED

WHEREFORE, the Department respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein;
- B. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed, including that Respondent be required to disgorge fully any and all ill-gotten gains and/or make full and complete restitution, together with interest;
- C. make specific findings that Respondent willfully violated Sections 15(c) and 17(a) of the Exchange Act and Exchange Act Rules 15c3-1, 17a-3, and 17a-11; and
- D. order that Respondent bear such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

FINRA DEPARTMENT OF ENFORCEMENT

Date: April 25, 2014



Bonnie S. McGuire, Senior Regional Counsel
William St. Louis, Regional Chief Counsel
FINRA Department of Enforcement
99 High Street, 9th Floor
Boston, MA 02110
Phone: (617) 532-3424
Fax: (202) 721-6531
bonnie.mcguire@finra.org

Schedule A

Schedule A

TRANSACTION NUMBER	BUY/SELL	SYMBOL	SHARE QTY	PRICE	PRINCIPAL AMOUNT	COMMISSION	TRADE DATE	CUSIP	COMMISSION %	COMMISSION AMOUNT CHARGED OVER 5%
1	B	ABK	3,000	\$1.1976	\$3,592.80	\$218.56	01/14/09	023139108	6.08%	\$38.92
2	S	AWP	1,000	\$3.3171	\$3,317.10	\$178.02	01/20/09	02083A103	5.37%	\$12.17
3	S	IVOB	5,000	\$0.5000	\$2,500.00	\$202.00	03/06/09	44984F104	8.08%	\$77.00
4	S	IVOB	5,000	\$0.5000	\$2,500.00	\$202.00	03/06/09	44984F104	8.08%	\$77.00
5	S	IVOB	5,000	\$0.5000	\$2,500.00	\$204.00	03/23/09	44984F104	8.16%	\$79.00
6	S	IVOB	5,000	\$0.4000	\$2,000.00	\$164.00	04/15/09	44984F104	8.20%	\$64.00
7	S	ABK	3,000	\$1.0624	\$3,187.20	\$194.23	04/17/09	023139108	6.09%	\$18.76
8	B	AIG	2,000	\$1.6500	\$3,300.00	\$183.76	04/17/09	026874107	5.57%	\$34.87
9	B	UBAA	2,000	\$1.2670	\$2,534.00	\$206.72	05/26/09	91707P208	8.16%	\$80.02
10	B	UBAA	2,500	\$1.3385	\$3,346.25	\$271.70	05/28/09	91707P208	8.12%	\$104.39
11	B	UBAA	2,500	\$1.3400	\$3,350.00	\$272.00	05/28/09	91707P208	8.12%	\$104.50
12	B	UBAA	4,000	\$1.3625	\$5,450.00	\$380.06	06/05/09	91707P208	6.97%	\$107.56
13	B	UBAA	7,500	\$1.2494	\$9,370.50	\$500.00	06/26/09	91707P208	5.34%	\$31.48
14	B	UBAA	5,000	\$1.2490	\$6,245.00	\$503.60	07/08/09	91707P208	8.06%	\$191.35
15	B	SSP	1,000	\$3.0694	\$3,069.40	\$174.36	07/24/09	811054402	5.68%	\$20.89
16	B	UBAA	4,000	\$1.3966	\$5,586.40	\$342.47	07/28/09	91707P208	6.13%	\$63.15
17	S	IVOB	20,000	\$0.2625	\$5,250.00	\$445.54	08/06/09	44984F104	8.49%	\$150.53
18	S	IVOB	10,000	\$0.2700	\$2,700.00	\$222.77	08/06/09	44984F104	8.25%	\$152.41
19	S	IVOB	10,000	\$0.2800	\$2,800.00	\$222.76	08/06/09	44984F104	7.96%	\$82.76
20	S	IVOB	10,000	\$0.2800	\$2,800.00	\$222.77	08/06/09	44984F104	7.96%	\$72.76
21	S	IVOB	20,000	\$0.2808	\$5,616.00	\$445.54	08/06/09	44984F104	7.93%	\$87.77
22	S	IVOB	20,000	\$0.2815	\$5,630.00	\$445.54	08/06/09	44984F104	7.91%	\$82.77
23	S	IVOB	10,000	\$0.3000	\$3,000.00	\$222.76	08/06/09	44984F104	7.43%	\$183.04
24	B	UBAA	5,000	\$1.3600	\$6,800.00	\$492.41	08/06/09	91707P208	7.24%	\$164.74
25	B	UBAA	5,000	\$1.3675	\$6,837.50	\$492.40	08/06/09	91707P208	7.20%	\$164.04
26	S	IVOB	25,000	\$0.3300	\$8,250.00	\$698.47	08/07/09	44984F104	8.47%	\$91.06
27	S	IVOB	20,000	\$0.3500	\$7,000.00	\$558.76	08/07/09	44984F104	7.98%	\$208.76
28	S	IVOB	20,000	\$0.3700	\$7,400.00	\$558.77	08/07/09	44984F104	7.55%	\$188.77
29	B	UBAA	2,000	\$1.4932	\$2,986.40	\$240.38	08/07/09	91707P208	8.05%	\$285.97
30	S	IVOB	20,000	\$0.3516	\$7,032.00	\$566.56	08/10/09	44984F104	8.06%	\$214.96
31	S	IVOB	10,000	\$0.2800	\$2,800.00	\$239.74	08/11/09	44984F104	8.56%	\$104.62
32	S	IVOB	10,000	\$0.2900	\$2,900.00	\$239.74	08/11/09	44984F104	8.27%	\$103.04
33	B	UBAA	3,000	\$1.5820	\$4,746.00	\$341.92	08/11/09	91707P208	7.20%	\$99.74
34	B	UBAA	3,000	\$1.5970	\$4,791.00	\$342.59	08/11/09	91707P208	7.15%	\$94.74
35	B	AAUKY	225	\$15.3600	\$3,456.00	\$213.75	08/12/09	03485P201	6.18%	\$40.95
36	B	CKKHF	11,000	\$0.9700	\$10,670.00	\$857.60	08/14/09	G2237F100	8.04%	\$324.10
37	B	CKKHF	50,000	\$0.9700	\$48,500.00	\$3,884.00	08/14/09	G2237F100	8.01%	\$1,459.00
38	S	BSTK	32,487	\$0.0700	\$2,274.09	\$185.93	08/20/09	11041N206	8.18%	\$72.23
39	S	IVOB	10,000	\$0.2500	\$2,500.00	\$204.80	08/20/09	44984F104	8.19%	\$79.80
40	S	IVOB	10,000	\$0.2600	\$2,600.00	\$204.80	08/20/09	44984F104	7.88%	\$74.80
41	S	IVOB	5,000	\$0.3600	\$1,800.00	\$152.80	08/26/09	44984F104	8.49%	\$122.45
42	S	IVOB	10,000	\$0.3700	\$3,700.00	\$305.60	08/26/09	44984F104	8.26%	\$123.28
43	S	IVOB	10,000	\$0.4000	\$4,000.00	\$305.60	08/26/09	44984F104	7.64%	\$143.90
44	B	UBAA	4,000	\$1.5794	\$6,317.60	\$438.33	08/26/09	91707P208	6.94%	\$62.80
45	B	UBAA	6,000	\$1.6388	\$9,832.80	\$635.54	08/26/09	91707P208	6.46%	\$120.60
46	B	UBAA	5,000	\$1.6700	\$8,350.00	\$540.78	08/26/09	91707P208	6.48%	\$105.60
47	B	UBAA	3,000	\$1.5988	\$4,796.40	\$342.67	08/31/09	91707P208	7.14%	\$102.85
48	S	BSTK	6,250	\$0.4273	\$2,670.63	\$217.65	09/09/09	11041N206	8.15%	\$84.12
49	S	BSTK	10,000	\$0.3800	\$3,800.00	\$335.34	09/10/09	11041N206	8.82%	\$125.33
50	S	BSTK	10,000	\$0.4200	\$4,200.00	\$335.33	09/10/09	11041N206	7.98%	\$109.08
51	S	BSTK	10,000	\$0.4525	\$4,525.00	\$335.33	09/10/09	11041N206	7.41%	\$145.34
52	B	UBAA	3,000	\$1.7448	\$5,234.40	\$349.16	09/15/09	91707P208	6.67%	\$87.44
53	B	CVM	3,000	\$1.3200	\$3,960.00	\$208.52	09/16/09	150837409	5.27%	\$10.52
54	B	CVM	3,000	\$1.3600	\$4,080.00	\$214.76	09/18/09	150837409	5.26%	\$10.76
55	S	UBAA	1,200	\$1.8080	\$2,169.60	\$172.41	09/22/09	91707P208	7.95%	\$63.93
56	B	CKKHF	65,000	\$0.7700	\$50,050.00	\$4,008.00	09/25/09	G2237F100	8.01%	\$98.86
57	S	UBAA	2,700	\$1.7951	\$4,846.77	\$321.21	09/25/09	91707P208	6.63%	\$1,505.50
58	B	UBAA	5,000	\$1.8057	\$9,028.50	\$550.28	09/25/09	91707P208	6.09%	\$78.87
59	S	UBAA	5,700	\$1.7075	\$9,732.75	\$611.94	09/29/09	91707P208	6.29%	\$125.30

Schedule A

TRANSACTION NUMBER	BUY/SELL	SYMBOL	SHARE QTY	PRICE	PRINCIPAL AMOUNT	COMMISSION	TRADE DATE	CUSIP	COMMISSION %	COMMISSION AMOUNT CHARGED OVER 5%
60	S	UBAA	5,000	\$1.7600	\$8,800.00	\$547.08	09/30/09	91707P208	6.22%	\$107.08
61	S	BSTK	18,175	\$0.1500	\$2,726.25	\$222.10	10/01/09	11041N206	8.15%	\$85.79
62	B	LAB	1,000	\$2.6663	\$2,666.30	\$168.39	10/23/09	505447102	6.32%	\$35.08
63	B	LAB	1,000	\$2.6692	\$2,669.20	\$168.43	10/23/09	505447102	6.31%	\$34.97
64	B	UBAA	2,000	\$1.6966	\$3,393.20	\$184.80	10/26/09	91707P208	5.45%	\$15.14
65	B	CKKHF	28,000	\$1.1100	\$31,080.00	\$2,490.40	10/27/09	G2237F100	8.01%	\$174.22
66	B	CKKHF	30,000	\$1.1100	\$33,300.00	\$2,658.84	10/27/09	G2237F100	7.98%	\$226.06
67	B	CKKHF	4,000	\$1.1200	\$4,480.00	\$398.22	10/27/09	G2237F100	8.89%	\$936.40
68	B	UBAA	22,200	\$1.6960	\$37,651.20	\$2,108.62	10/27/09	91707P208	5.60%	\$993.84
69	S	CLRT	2,000	\$2.5603	\$5,120.60	\$258.46	11/04/09	180489106	5.05%	\$2.43
70	B	UBAA	4,600	\$1.5685	\$7,215.10	\$495.29	11/17/09	91707P208	6.86%	\$134.54
71	B	UBAA	5,400	\$1.4851	\$8,019.54	\$565.75	11/23/09	91707P208	7.05%	\$164.77
72	B	UBAA	5,000	\$1.4632	\$7,316.00	\$526.30	11/24/09	91707P208	7.19%	\$70.49
73	B	UBAA	2,500	\$1.4722	\$3,680.50	\$289.15	11/24/09	91707P208	7.86%	\$105.13
74	B	UBAA	1,500	\$1.4775	\$2,216.25	\$181.30	11/24/09	91707P208	8.18%	\$160.50
75	S	IVOB	10,000	\$0.3400	\$3,400.00	\$277.79	12/07/09	44984F104	8.17%	\$107.79
76	B	CNPXF	3,000	\$1.4000	\$4,200.00	\$250.38	12/09/09	G2237F126	5.96%	\$40.38
77	S	IVOB	10,000	\$0.3027	\$3,027.00	\$246.16	12/10/09	44984F104	8.13%	\$94.81
78	B	UBAA	3,700	\$1.4632	\$5,413.84	\$300.00	12/14/09	91707P208	5.54%	\$105.38
79	B	UBAA	2,500	\$1.4694	\$3,673.50	\$289.05	12/14/09	91707P208	7.87%	\$29.31
80	S	UBAA	22,200	\$1.4200	\$31,524.00	\$2,070.63	12/15/09	91707P208	6.57%	\$91.42
81	B	UBAA	2,000	\$1.4570	\$2,914.00	\$237.12	12/15/09	91707P208	8.14%	\$494.43
82	S	FNM	4,000	\$1.1201	\$4,480.40	\$235.57	12/16/09	313586109	5.26%	\$11.55
83	S	UBAA	2,000	\$1.4022	\$2,804.40	\$228.35	12/17/09	91707P208	8.14%	\$88.13
84	S	UBAA	2,000	\$1.4280	\$2,856.00	\$232.48	12/17/09	91707P208	8.14%	\$89.68
85	B	UBAA	2,600	\$1.3945	\$3,625.70	\$292.15	12/21/09	91707P208	8.06%	\$110.87
86	B	ESLR	2,000	\$1.6587	\$3,317.40	\$245.28	12/23/09	30033R108	7.39%	\$79.41
87	B	FNM	10,000	\$1.2653	\$12,653.00	\$700.00	12/28/09	313586109	5.53%	\$67.35
88	S	UBAA	2,500	\$1.4990	\$3,747.50	\$290.14	01/11/10	91707P208	7.74%	\$32.07
89	S	UBAA	4,000	\$1.4999	\$5,999.60	\$433.87	01/11/10	91707P208	7.23%	\$32.07
90	S	LAB	1,000	\$2.7519	\$2,751.90	\$169.66	01/11/10	505447102	6.17%	\$102.77
91	S	LAB	1,000	\$2.7519	\$2,751.90	\$169.66	01/11/10	505447102	6.17%	\$133.89
92	B	CNPXF	3,000	\$1.5000	\$4,500.00	\$338.28	01/12/10	G2237F126	7.52%	\$113.28
93	S	UBAA	2,000	\$1.5322	\$3,064.40	\$241.53	01/12/10	91707P208	7.88%	\$88.31
94	S	UBAA	3,000	\$1.5300	\$4,590.00	\$339.61	01/22/10	91707P208	7.40%	\$110.11
95	S	UBAA	3,000	\$1.5604	\$4,681.20	\$340.96	01/25/10	91707P208	7.28%	\$106.90
96	S	UBAA	4,000	\$1.5665	\$6,266.00	\$437.60	01/25/10	91707P208	6.98%	\$124.30
97	S	UBAA	4,000	\$1.5713	\$6,285.20	\$437.87	01/25/10	91707P208	6.97%	\$123.61
98	S	UBAA	3,000	\$1.6431	\$4,929.30	\$344.63	01/27/10	91707P208	6.99%	\$98.17
99	S	FNM	20,000	\$1.0100	\$20,200.00	\$1,050.00	02/22/10	313586109	5.20%	\$137.41
100	S	CNPXF	5,700	\$1.1700	\$6,669.00	\$537.52	02/22/10	G2237F126	8.06%	\$164.81
101	S	UBAA	5,000	\$1.4393	\$7,196.50	\$524.63	02/22/10	91707P208	7.29%	\$204.07
102	S	UBAA	4,000	\$1.4755	\$5,902.00	\$432.51	02/22/10	91707P208	7.33%	\$40.00
103	B	TJIPF	22,000	\$0.3100	\$6,820.00	\$550.00	02/23/10	G88680106	8.06%	\$209.00
104	B	BNX	10,000	\$0.3898	\$3,898.00	\$315.84	03/01/10	066470105	8.10%	\$120.94
105	B	UBAA	1,400	\$1.5805	\$2,212.70	\$181.02	03/15/10	91707P208	8.18%	\$70.39
106	B	UBAA	3,200	\$1.6415	\$5,252.80	\$344.22	03/19/10	91707P208	6.55%	\$63.17
107	B	UBAA	1,200	\$1.6436	\$1,972.32	\$161.79	03/19/10	91707P208	8.20%	\$81.58
108	S	SBLK	1,078	\$2.8314	\$3,052.25	\$178.66	03/24/10	Y8162K105	5.85%	\$26.05
109	B	END	5,000	\$1.3884	\$6,942.00	\$521.07	03/25/10	29259G101	7.51%	\$173.97
110	B	END	5,000	\$1.3890	\$6,945.00	\$521.11	03/25/10	29259G101	7.50%	\$173.86
111	B	END	7,500	\$1.3486	\$10,114.50	\$750.48	03/26/10	29259G101	7.42%	\$21.93
112	B	UBAA	3,000	\$1.5408	\$4,622.40	\$340.09	03/26/10	91707P208	7.36%	\$108.97
113	B	UBAA	5,000	\$1.5766	\$7,883.00	\$534.24	03/26/10	91707P208	6.78%	\$140.09
114	B	DRAM	2,000	\$2.4752	\$4,950.40	\$269.45	03/26/10	238108203	5.44%	\$244.76
115	B	UBAA	3,000	\$1.6279	\$4,883.70	\$343.96	04/06/10	91707P208	7.04%	\$99.78
116	B	UBAA	4,000	\$1.5948	\$6,379.20	\$439.19	04/07/10	91707P208	6.88%	\$120.23
117	B	UBAA	9,000	\$1.5919	\$14,327.10	\$920.46	04/14/10	91707P208	6.42%	\$204.11
118	B	UBAA	4,000	\$1.5952	\$6,380.80	\$439.21	04/15/10	91707P208	6.88%	\$120.17

Schedule A

TRANSACTION NUMBER	BUY/SELL	SYMBOL	SHARE QTY	PRICE	PRINCIPAL AMOUNT	COMMISSION	TRADE DATE	CUSIP	COMMISSION %	COMMISSION AMOUNT CHARGED OVER 5%
119	B	UBAA	2,800	\$1.6623	\$4,654.44	\$325.77	04/20/10	91707P208	7.00%	\$93.05
120	B	UBAA	2,000	\$1.6930	\$3,386.00	\$246.29	04/21/10	91707P208	7.27%	\$76.99
121	B	UBAA	10,000	\$1.6995	\$16,995.00	\$1,031.81	04/21/10	91707P208	6.07%	\$111.54
122	B	UBAA	4,500	\$1.6996	\$7,648.20	\$493.95	04/21/10	91707P208	6.46%	\$182.06
123	B	UBAA	10,000	\$1.7065	\$17,065.00	\$1,032.79	04/21/10	91707P208	6.05%	\$179.54
124	B	UBAA	15,000	\$1.7065	\$25,597.50	\$1,489.48	04/21/10	91707P208	5.82%	\$209.61
125	S	DRAM	1,000	\$2.6219	\$2,621.90	\$167.73	04/21/10	238108203	6.40%	\$36.64
126	B	UBAA	5,000	\$1.6980	\$8,490.00	\$542.74	04/22/10	91707P208	6.39%	\$118.24
127	B	END	5,000	\$1.6184	\$8,092.00	\$537.17	04/23/10	29259G101	6.64%	\$73.68
128	B	END	5,000	\$1.6195	\$8,097.50	\$537.25	04/23/10	29259G101	6.63%	\$73.10
129	B	UBAA	5,000	\$1.7372	\$8,686.00	\$545.48	04/23/10	91707P208	6.28%	\$72.73
130	B	UBAA	2,000	\$1.7400	\$3,480.00	\$247.68	04/23/10	91707P208	7.12%	\$132.57
131	B	UBAA	2,000	\$1.7483	\$3,496.60	\$247.93	04/23/10	91707P208	7.09%	\$132.38
132	B	UBAA	2,000	\$1.7535	\$3,507.00	\$248.08	04/23/10	91707P208	7.07%	\$111.18
133	B	UBAA	6,500	\$1.7561	\$11,414.65	\$694.69	04/26/10	91707P208	6.09%	\$85.07
134	B	UBAA	4,000	\$1.7595	\$7,038.00	\$448.41	04/26/10	91707P208	6.37%	\$82.56
135	B	UBAA	3,000	\$1.7668	\$5,300.40	\$350.09	04/26/10	91707P208	6.60%	\$96.51
136	B	UBAA	5,000	\$1.7676	\$8,838.00	\$547.61	04/26/10	91707P208	6.20%	\$89.38
137	B	UBAA	5,000	\$1.7868	\$8,934.00	\$548.96	04/26/10	91707P208	6.14%	\$95.98
138	B	UBAA	3,000	\$1.7900	\$5,370.00	\$351.06	04/26/10	91707P208	6.54%	\$105.71
139	B	UBAA	4,500	\$1.7957	\$8,080.65	\$500.01	04/26/10	91707P208	6.19%	\$102.26
140	B	UBAA	4,000	\$1.8090	\$7,236.00	\$451.18	04/26/10	91707P208	6.24%	\$123.96
141	S	ABK	3,000	\$1.8319	\$5,495.70	\$352.82	04/26/10	023139108	6.42%	\$78.04
142	B	UBAA	5,000	\$1.7248	\$8,624.00	\$463.07	04/27/10	91707P208	5.37%	\$98.60
143	B	UBAA	4,000	\$1.7450	\$6,980.00	\$447.60	04/27/10	91707P208	6.41%	\$25.79
144	B	UBAA	5,000	\$1.7491	\$8,745.50	\$463.06	04/27/10	91707P208	5.29%	\$22.19
145	B	UBAA	5,000	\$1.7558	\$8,779.00	\$463.07	04/27/10	91707P208	5.27%	\$31.87
146	B	UBAA	5,000	\$1.7576	\$8,788.00	\$546.91	04/27/10	91707P208	6.22%	\$24.12
147	B	UBAA	5,000	\$1.7611	\$8,805.50	\$463.07	04/27/10	91707P208	5.26%	\$22.80
148	B	UBAA	5,000	\$1.7625	\$8,812.50	\$463.07	04/27/10	91707P208	5.25%	\$22.45
149	B	UBAA	5,000	\$1.7635	\$8,817.50	\$463.06	04/27/10	91707P208	5.25%	\$107.51
150	B	UBAA	2,000	\$1.7647	\$3,529.40	\$248.42	04/28/10	91707P208	7.04%	\$71.95
151	B	UBAA	4,000	\$1.6333	\$6,533.20	\$441.34	05/04/10	91707P208	6.76%	\$114.68
152	B	UBAA	3,500	\$1.5482	\$5,418.70	\$388.74	05/13/10	91707P208	7.17%	\$117.81
153	B	UBAA	3,500	\$1.4484	\$5,069.40	\$383.85	05/18/10	91707P208	7.57%	\$130.38
154	B	UBAA	2,000	\$1.3500	\$2,700.00	\$220.00	05/20/10	91707P208	8.15%	\$85.00
155	B	ECTE	1,500	\$1.3500	\$2,025.00	\$166.00	05/24/10	27876L107	8.20%	\$64.75
156	B	UBAA	3,500	\$1.3304	\$4,656.40	\$376.51	05/25/10	91707P208	8.09%	\$76.24
157	B	UBAA	2,000	\$1.3660	\$2,732.00	\$213.25	05/25/10	91707P208	7.81%	\$76.65
158	B	UBAA	2,000	\$1.3700	\$2,740.00	\$213.24	05/25/10	91707P208	7.78%	\$86.34
159	B	UBAA	2,000	\$1.3723	\$2,744.60	\$223.57	05/25/10	91707P208	8.15%	\$89.39
160	B	UBAA	5,000	\$1.3915	\$6,957.50	\$494.83	05/25/10	91707P208	7.11%	\$124.34
161	B	UBAA	3,000	\$1.3953	\$4,185.90	\$333.63	05/25/10	91707P208	7.97%	\$143.69
162	B	UBAA	4,000	\$1.3976	\$5,590.40	\$428.15	05/25/10	91707P208	7.66%	\$148.63
163	B	UBAA	5,000	\$1.4020	\$7,010.00	\$522.02	05/25/10	91707P208	7.45%	\$146.96
164	B	UBAA	5,000	\$1.4054	\$7,027.00	\$494.83	05/25/10	91707P208	7.04%	\$143.48
165	B	UBAA	2,000	\$1.4231	\$2,846.20	\$231.70	05/25/10	91707P208	8.14%	\$171.52
166	B	UBAA	5,000	\$1.3508	\$6,754.00	\$518.44	05/26/10	91707P208	7.68%	\$180.74
167	B	UBAA	5,000	\$1.4269	\$7,134.50	\$523.76	05/27/10	91707P208	7.34%	\$167.04
168	B	UBAA	5,000	\$1.4371	\$7,185.50	\$524.48	05/27/10	91707P208	7.30%	\$165.21
169	B	UBAA	1,500	\$1.4120	\$2,118.00	\$173.44	06/03/10	91707P208	8.19%	\$67.54
170	B	UBAA	2,000	\$1.4170	\$2,834.00	\$230.72	06/03/10	91707P208	8.14%	\$89.02
171	B	UBAA	2,000	\$1.4092	\$2,818.40	\$229.47	06/04/10	91707P208	8.14%	\$88.55
172	B	DRAM	2,000	\$1.7000	\$3,400.00	\$246.50	06/04/10	238108203	7.25%	\$76.50
173	B	UBAA	5,000	\$1.4355	\$7,177.50	\$524.37	06/08/10	91707P208	7.31%	\$165.50
174	S	END	2,500	\$1.0207	\$2,551.75	\$208.14	07/01/10	29259G101	8.16%	\$28.55
175	S	END	2,500	\$1.0219	\$2,554.75	\$208.38	07/01/10	29259G101	8.16%	\$80.55
176	S	END	4,000	\$1.0219	\$4,087.60	\$331.01	07/01/10	29259G101	8.10%	\$80.64
177	S	PXLW	1,000	\$2.8519	\$2,851.90	\$171.14	07/01/10	72581M305	6.00%	\$126.63

Schedule A

TRANSACTION NUMBER	BUY/SELL	SYMBOL	SHARE QTY	PRICE	PRINCIPAL AMOUNT	COMMISSION	TRADE DATE	CUSIP	COMMISSION %	COMMISSION AMOUNT CHARGED OVER 5%
178	B	YRCW	20,000	\$0.1363	\$2,726.00	\$166.56	07/06/10	984249102	6.11%	\$30.26
179	B	UBAA	5,600	\$1.2500	\$7,000.00	\$373.33	07/13/10	91707P208	5.33%	\$23.33
180	S	UBAA	5,600	\$1.2500	\$7,000.00	\$564.00	07/13/10	91707P208	8.06%	\$214.00
181	S	END	2,500	\$1.0705	\$2,676.25	\$218.10	07/15/10	29259G101	8.15%	\$9.24
182	S	PXLW	1,000	\$3.4004	\$3,400.40	\$179.26	07/15/10	72581M305	5.27%	\$84.29
183	S	END	3,500	\$1.0220	\$3,577.00	\$290.16	07/19/10	29259G101	8.11%	\$111.31
184	S	DRAM	4,000	\$1.4954	\$5,981.60	\$433.62	07/19/10	238108203	7.25%	\$134.54
185	S	END	2,500	\$1.0745	\$2,686.25	\$218.90	07/21/10	29259G101	8.15%	\$84.59
186	S	END	2,500	\$1.0800	\$2,700.00	\$220.00	07/21/10	29259G101	8.15%	\$85.00
187	S	END	5,000	\$1.1008	\$5,504.00	\$444.32	07/21/10	29259G101	8.07%	\$169.12
188	B	FNMA	30,000	\$0.3997	\$11,991.00	\$900.00	07/27/10	313586109	7.51%	\$77.02
189	B	FMCC	30,000	\$0.4196	\$12,588.00	\$900.00	07/27/10	313400301	7.15%	\$92.45
190	S	UBAA	5,000	\$1.1570	\$5,785.00	\$466.90	07/27/10	91707P208	8.07%	\$300.45
191	S	UBAA	5,000	\$1.1675	\$5,837.50	\$466.90	07/27/10	91707P208	8.00%	\$270.60
192	S	UBAA	5,000	\$1.1714	\$5,857.00	\$472.56	07/27/10	91707P208	8.07%	\$97.79
193	B	UBAA	10,000	\$1.2131	\$12,131.00	\$699.00	07/27/10	91707P208	5.76%	\$177.65
194	B	UBAA	2,000	\$1.2170	\$2,434.00	\$198.72	07/27/10	91707P208	8.16%	\$175.03
195	S	END	2,500	\$1.2505	\$3,126.25	\$254.10	07/27/10	29259G101	8.13%	\$179.71
196	S	IVOB	36,950	\$0.0500	\$1,847.50	\$154.92	08/20/10	44984F104	8.39%	\$59.50
197	B	VIZS	5,000	\$0.3700	\$1,850.00	\$152.00	08/20/10	92856X109	8.22%	\$62.55
198	S	UBAA	5,000	\$1.1610	\$5,805.00	\$350.00	08/24/10	91707P208	6.03%	\$59.75
199	S	UBAA	5,000	\$1.1743	\$5,871.50	\$350.00	08/24/10	91707P208	5.96%	\$56.43
200	S	FNMA	30,000	\$0.2908	\$8,724.00	\$700.00	08/25/10	313586109	8.02%	\$119.63
201	S	FMCC	30,000	\$0.3160	\$9,480.00	\$700.00	08/25/10	313400301	7.38%	\$193.37
202	S	UBAA	5,000	\$1.1310	\$5,655.00	\$350.00	08/25/10	91707P208	6.19%	\$67.25
203	B	UBAA	3,400	\$1.1336	\$3,854.24	\$312.34	08/25/10	91707P208	8.10%	\$263.80
204	B	UBAA	5,500	\$1.1477	\$6,312.35	\$508.99	08/25/10	91707P208	8.06%	\$226.00
205	S	UBAA	5,000	\$1.1260	\$5,630.00	\$454.40	08/26/10	91707P208	8.07%	\$172.90
206	S	UBAA	2,000	\$1.1335	\$2,267.00	\$179.09	08/27/10	91707P208	7.90%	\$65.74
207	S	SRCP	2,625,000	\$0.0035	\$9,187.50	\$739.00	09/10/10	812231108	8.04%	\$279.63
208	S	UBAA	4,500	\$1.1390	\$5,125.50	\$289.82	09/23/10	91707P208	5.65%	\$33.55
209	S	RRI	1,000	\$3.5308	\$3,530.80	\$181.19	09/24/10	74971X107	5.13%	\$4.65
210	S	RRI	1,000	\$3.5708	\$3,570.80	\$181.78	09/24/10	74971X107	5.09%	\$3.24
211	S	UBAA	5,000	\$1.1185	\$5,592.50	\$451.40	09/27/10	91707P208	8.07%	\$10.56
212	S	UBAA	10,000	\$1.1231	\$11,231.00	\$902.48	09/27/10	91707P208	8.04%	\$171.78
213	S	UBAA	5,000	\$1.1264	\$5,632.00	\$454.56	09/27/10	91707P208	8.07%	\$172.96
214	S	UBAA	3,500	\$1.1385	\$3,984.75	\$209.80	09/27/10	91707P208	5.27%	\$340.93
215	S	UBAA	10,000	\$1.1538	\$11,538.00	\$927.04	10/08/10	91707P208	8.03%	\$350.14
216	B	SONS	1,000	\$3.2500	\$3,250.00	\$177.03	10/20/10	835916107	5.45%	\$14.53
217	B	DNN	4,000	\$2.1492	\$8,596.80	\$470.24	10/26/10	248356107	5.47%	\$51.40
218	B	DNN	5,000	\$2.1492	\$10,746.00	\$574.32	10/26/10	248356107	5.34%	\$51.40
219	B	DNN	1,000	\$2.1592	\$2,159.20	\$159.36	10/26/10	248356107	7.38%	\$40.40
220	B	DNN	1,000	\$2.1592	\$2,159.20	\$159.36	10/26/10	248356107	7.38%	\$37.02
221	B	DNN	5,000	\$2.1592	\$10,796.00	\$575.02	10/26/10	248356107	5.33%	\$35.22
222	S	UBAA	1,600	\$1.2185	\$1,949.60	\$159.97	11/02/10	91707P208	8.21%	\$62.49
223	S	UBAA	2,500	\$1.2315	\$3,078.75	\$159.68	11/12/10	91707P208	5.19%	\$5.74
224	B	UBAA	4,000	\$1.2011	\$4,804.40	\$291.26	11/18/10	91707P208	6.06%	\$51.04
225	B	UBAA	10,000	\$1.1844	\$11,844.00	\$942.36	11/22/10	91707P208	7.96%	\$183.69
226	B	UBAA	5,000	\$1.1979	\$5,989.50	\$483.16	11/22/10	91707P208	8.07%	\$350.16
227	S	UBAA	11,000	\$1.1524	\$12,676.40	\$1,018.11	11/23/10	91707P208	8.03%	\$29.17
228	B	MNEAF	2,000	\$2.1175	\$4,235.00	\$258.86	11/23/10	602910101	6.11%	\$47.11
229	B	DNN	1,500	\$2.5192	\$3,778.80	\$218.11	11/23/10	248356107	5.77%	\$19.00
230	B	DNN	2,000	\$2.5192	\$5,038.40	\$270.92	11/23/10	248356107	5.38%	\$19.00
231	B	DNN	2,000	\$2.5192	\$5,038.40	\$270.92	11/23/10	248356107	5.38%	\$19.00
232	B	DNN	2,000	\$2.5192	\$5,038.40	\$270.92	11/23/10	248356107	5.38%	\$19.00
233	B	DNN	2,000	\$2.5192	\$5,038.40	\$270.92	11/23/10	248356107	5.38%	\$384.29
234	S	UBAA	5,000	\$1.1671	\$5,835.50	\$470.84	11/24/10	91707P208	8.07%	\$30.75
235	S	UBAA	3,500	\$1.1770	\$4,119.50	\$333.56	11/24/10	91707P208	8.10%	\$26.17
236	S	UBAA	4,000	\$1.1812	\$4,724.80	\$381.98	11/24/10	91707P208	8.08%	\$74.92

Schedule A

TRANSACTION NUMBER	BUY/SELL	SYMBOL	SHARE QTY	PRICE	PRINCIPAL AMOUNT	COMMISSION	TRADE DATE	CUSIP	COMMISSION %	COMMISSION AMOUNT CHARGED OVER 5%
237	S	UBAA	2,000	\$1.1820	\$2,364.00	\$193.12	11/24/10	91707P208	8.17%	\$127.59
238	B	DNN	1,000	\$2.7892	\$2,789.20	\$170.21	11/24/10	248356107	6.10%	\$145.74
239	B	DNN	1,000	\$2.9192	\$2,919.20	\$172.13	11/24/10	248356107	5.90%	\$179.07
240	S	SNDZ	15,000	\$0.1600	\$2,400.00	\$196.00	12/06/10	86771T102	8.17%	\$76.00
241	S	SNDZ	30,000	\$0.1710	\$5,130.00	\$427.03	12/08/10	86771T102	8.32%	\$170.53
242	S	SNDZ	30,000	\$0.1900	\$5,700.00	\$427.03	12/08/10	86771T102	7.49%	\$142.03
243	S	UBAA	4,500	\$1.2350	\$5,557.50	\$1,050.00	12/13/10	91707P208	18.89%	\$772.13
244	S	SNDZ	50,000	\$0.1000	\$5,000.00	\$415.07	12/14/10	86771T102	8.30%	\$57.04
245	S	SNDZ	50,000	\$0.1032	\$5,160.00	\$415.07	12/14/10	86771T102	8.04%	\$165.07
246	S	SNDZ	21,000	\$0.1117	\$2,345.70	\$174.32	12/14/10	86771T102	7.43%	\$157.07
247	S	DNN	1,000	\$3.2519	\$3,251.90	\$177.06	12/22/10	248356107	5.44%	\$14.47
248	S	UBAA	3,000	\$1.1834	\$3,550.20	\$288.02	12/23/10	91707P208	8.11%	\$58.86
249	B	UBAA	1,500	\$1.2190	\$1,828.50	\$150.28	12/23/10	91707P208	8.22%	\$110.51
250	S	NEI	3,000	\$1.4911	\$4,473.30	\$270.30	12/27/10	64121A107	6.04%	\$46.64
251	S	SNDZ	50,000	\$0.0800	\$4,000.00	\$322.30	12/28/10	86771T102	8.06%	\$122.30
252	S	SNDZ	50,000	\$0.0800	\$4,000.00	\$322.30	12/28/10	86771T102	8.06%	\$122.30
253	S	SNDZ	50,000	\$0.0805	\$4,025.00	\$322.30	12/28/10	86771T102	8.01%	\$121.05
254	S	SNDZ	50,000	\$0.0808	\$4,040.00	\$322.30	12/28/10	86771T102	7.98%	\$120.30
255	S	SNDZ	61,000	\$0.1002	\$6,112.20	\$492.98	12/31/10	86771T102	8.07%	\$187.37
256	S	SNDZ	29,000	\$0.0990	\$2,871.00	\$233.68	01/03/11	86771T102	8.14%	\$90.13
257	S	CVM	9,300	\$0.8056	\$7,492.08	\$422.35	01/04/11	150837409	5.64%	\$2.38
258	B	SNV	2,000	\$2.7500	\$5,500.00	\$277.38	01/04/11	87161C105	5.04%	\$11.68
259	S	DNN	1,000	\$3.3311	\$3,331.10	\$178.23	01/04/11	248356107	5.35%	\$47.75
260	B	MNKD	200	\$8.3681	\$1,673.62	\$160.00	01/05/11	56400P201	9.56%	\$76.32
261	S	MNEAF	2,000	\$2.5500	\$5,100.00	\$271.78	01/06/11	602910101	5.33%	\$16.78
262	S	TUCN	23,000	\$0.1100	\$2,530.00	\$204.04	01/10/11	89156Q107	8.06%	\$77.54
263	S	TUCN	30,000	\$0.1000	\$3,000.00	\$244.00	01/11/11	89156Q107	8.13%	\$94.00
264	B	MNKD	200	\$9.4481	\$1,889.62	\$160.00	01/13/11	56400P201	8.47%	\$65.52
265	S	SIRI	6,000	\$1.5800	\$9,480.00	\$630.60	01/14/11	82967N108	6.65%	\$156.60
266	S	TUCN	42,000	\$0.0906	\$3,805.20	\$308.42	01/19/11	89156Q107	8.11%	\$118.16
267	B	MNEAF	2,000	\$2.4886	\$4,977.20	\$269.84	01/24/11	602910101	5.42%	\$7.88
268	B	MNEAF	1,500	\$2.4890	\$3,733.50	\$217.44	01/24/11	602910101	5.82%	\$7.52
269	B	MNEAF	1,500	\$2.4890	\$3,733.50	\$217.44	01/24/11	602910101	5.82%	\$7.17
270	B	MNEAF	2,000	\$2.4909	\$4,981.80	\$269.91	01/24/11	602910101	5.42%	\$30.77
271	B	DNN	1,000	\$3.4389	\$3,438.90	\$179.83	01/24/11	248356107	5.23%	\$30.77
272	B	DNN	1,000	\$3.4489	\$3,448.90	\$179.97	01/24/11	248356107	5.22%	\$20.98
273	B	DNN	1,000	\$3.4589	\$3,458.90	\$180.12	01/24/11	248356107	5.21%	\$20.82
274	B	UBAA	4,700	\$1.2389	\$5,822.83	\$469.83	01/26/11	91707P208	8.07%	\$5.90
275	B	UBAA	3,000	\$1.2450	\$3,735.00	\$302.80	01/26/11	91707P208	8.11%	\$116.05
276	B	NEI	2,000	\$1.9790	\$3,958.00	\$203.80	01/26/11	64121A107	5.15%	\$178.69
277	S	IVOB	100,000	\$0.0425	\$4,250.00	\$344.00	01/27/11	44984F104	8.09%	\$131.50
278	S	IVOB	156,340	\$0.0406	\$6,347.40	\$511.79	02/04/11	44984F104	8.06%	\$1.93
279	B	FBC	4,000	\$1.6486	\$6,594.40	\$331.65	02/04/11	337930507	5.03%	\$194.42
280	S	UBAA	10,000	\$1.3401	\$13,401.00	\$917.48	02/15/11	91707P208	6.85%	\$247.43
281	S	UBAA	15,000	\$1.3787	\$20,680.50	\$1,376.21	02/15/11	91707P208	6.65%	\$342.19
282	S	SBLK	1,078	\$2.4408	\$2,631.18	\$172.43	02/16/11	Y8162K105	6.55%	\$9.34
283	B	CGR	3,000	\$2.4679	\$7,403.70	\$379.53	02/16/11	182873109	5.13%	\$40.87
284	B	CGR	2,000	\$2.4990	\$4,998.00	\$270.15	02/17/11	182873109	5.41%	\$20.25
285	B	PTQMF	7,000	\$1.2700	\$8,890.00	\$600.00	02/18/11	716013107	6.75%	\$123.05
286	S	UBAA	10,000	\$1.3294	\$13,294.00	\$784.00	02/18/11	91707P208	5.90%	\$155.50
287	B	ARREF	5,000	\$1.5078	\$7,539.00	\$500.00	02/18/11	03074G109	6.63%	\$119.30
288	S	UBAA	10,000	\$1.3519	\$13,519.00	\$983.15	02/22/11	91707P208	7.27%	\$307.20
289	B	UBAA	2,150	\$1.3395	\$2,879.93	\$234.39	02/25/11	91707P208	8.14%	\$90.39
290	B	CGR	1,000	\$2.7392	\$2,739.20	\$169.47	03/03/11	182873109	6.19%	\$32.51
291	S	CSEY	30,000	\$0.1900	\$5,700.00	\$322.00	03/10/11	147485106	5.65%	\$40.90
292	B	MNEAF	1,000	\$2.5000	\$2,500.00	\$165.90	03/10/11	602910101	6.64%	\$37.00
293	B	MDWGF	4,000	\$1.7599	\$7,039.60	\$448.43	03/11/11	598153104	6.37%	\$36.42
294	B	CGR	2,000	\$2.2693	\$4,538.60	\$263.35	03/11/11	182873109	5.80%	\$96.45
295	B	DNN	1,000	\$2.5571	\$2,557.10	\$166.78	03/14/11	248356107	6.52%	\$38.92

Schedule A

TRANSACTION NUMBER	BUY/SELL	SYMBOL	SHARE QTY	PRICE	PRINCIPAL AMOUNT	COMMISSION	TRADE DATE	CUSIP	COMMISSION %	COMMISSION AMOUNT CHARGED OVER 5%
296	B	DNN	1,000	\$2.5572	\$2,557.20	\$166.78	03/14/11	248356107	6.52%	\$38.93
297	B	DNN	2,000	\$2.5882	\$5,176.40	\$272.85	03/14/11	248356107	5.27%	\$14.03
298	B	CTIC	15,000	\$0.2954	\$4,431.00	\$268.86	03/15/11	150934503	6.07%	\$47.31
299	S	DNN	1,000	\$2.8437	\$2,843.70	\$171.02	03/21/11	248356107	6.01%	\$28.84
300	S	DNN	1,000	\$2.8437	\$2,843.70	\$171.02	03/21/11	248356107	6.01%	\$28.84
301	S	DNN	1,000	\$2.8037	\$2,803.70	\$170.42	03/22/11	248356107	6.08%	\$30.24
302	S	DNN	1,000	\$2.8037	\$2,803.70	\$170.42	03/22/11	248356107	6.08%	\$30.24
303	B	MDW	2,000	\$1.9999	\$3,999.80	\$255.38	03/23/11	598153104	6.38%	\$55.39
304	B	UBAA	1,400	\$1.3319	\$1,864.66	\$153.17	03/25/11	91707P208	8.21%	\$59.94
305	B	RTRAF	1,000	\$2.4850	\$2,485.00	\$165.61	03/25/11	775903206	6.66%	\$41.36
306	B	RTRAF	2,000	\$2.4850	\$4,970.00	\$269.74	03/25/11	775903206	5.43%	\$21.24
307	B	RTRAF	2,000	\$2.4888	\$4,977.60	\$269.85	03/25/11	775903206	5.42%	\$20.97
308	S	DNN	1,270	\$2.7115	\$3,443.61	\$197.51	03/25/11	248356107	5.74%	\$25.33
309	B	PTQMF	5,000	\$1.0400	\$5,200.00	\$400.00	03/28/11	716013107	7.69%	\$43.83
310	B	PTQMF	15,000	\$1.0400	\$15,600.00	\$1,200.00	03/28/11	716013107	7.69%	\$140.00
311	B	RTRAF	1,000	\$2.4050	\$2,405.00	\$164.08	03/28/11	775903206	6.82%	\$420.00
312	S	SNDZ	60,000	\$0.0790	\$4,740.00	\$383.20	03/29/11	86771T102	8.08%	\$146.20
313	S	SNV	2,022	\$2.5426	\$5,141.14	\$275.48	04/04/11	87161C105	5.36%	\$18.42
314	S	UBAA	8,700	\$1.4415	\$12,541.05	\$873.25	04/18/11	91707P208	6.96%	\$246.20
315	S	RTRAF	2,000	\$1.9605	\$3,921.00	\$254.21	04/21/11	775903206	6.48%	\$58.16
316	S	RTRAF	2,000	\$1.9610	\$3,922.00	\$254.23	04/21/11	775903206	6.48%	\$58.13
317	S	SOHAF	900	\$2.4500	\$2,205.00	\$150.74	04/25/11	836307108	6.84%	\$40.49
318	S	MNEAF	1,500	\$3.0000	\$4,500.00	\$228.78	04/25/11	602910101	5.08%	\$13.42
319	S	VGZ	1,000	\$3.2817	\$3,281.70	\$177.50	04/25/11	927926303	5.41%	\$3.78
320	B	MEAOF	40,000	\$0.2800	\$11,200.00	\$900.00	04/27/11	59138Q103	8.04%	\$340.00
321	S	UBAA	2,000	\$1.4470	\$2,894.00	\$235.52	05/03/11	91707P208	8.14%	\$90.82
322	B	FBC	4,000	\$1.4380	\$5,752.00	\$322.80	05/11/11	337930507	5.61%	\$3.97
323	B	BAA	1,000	\$3.5499	\$3,549.90	\$181.47	05/11/11	066800103	5.11%	\$35.20
324	B	SOHAF	2,000	\$2.1215	\$4,243.00	\$258.98	05/12/11	836307108	6.10%	\$46.83
325	B	MNEAF	2,000	\$2.6200	\$5,240.00	\$273.74	05/12/11	602910101	5.22%	\$11.74
326	B	CGR	4,000	\$1.8383	\$7,353.20	\$452.82	05/17/11	182873109	6.16%	\$59.45
327	B	CGR	1,000	\$1.8483	\$1,848.30	\$151.86	05/17/11	182873109	8.22%	\$45.83
328	B	MNEAF	1,000	\$2.3400	\$2,340.00	\$162.83	05/17/11	602910101	6.96%	\$30.74
329	B	MNEAF	2,000	\$2.3500	\$4,700.00	\$265.74	05/17/11	602910101	5.65%	\$85.16
330	B	CGR	2,000	\$2.1784	\$4,356.80	\$260.66	05/24/11	182873109	5.98%	\$10.11
331	B	MNEAF	2,000	\$2.3900	\$4,780.00	\$266.92	05/24/11	602910101	5.58%	\$42.82
332	B	BAA	1,000	\$3.3757	\$3,375.70	\$178.89	05/24/11	066800103	5.30%	\$27.92
333	B	CGR	2,000	\$2.2491	\$4,498.20	\$262.75	05/25/11	182873109	5.84%	\$42.75
334	B	MNEAF	1,000	\$2.4400	\$2,440.00	\$164.75	05/25/11	602910101	6.75%	\$10.87
335	B	BAA	1,000	\$3.3541	\$3,354.10	\$178.57	05/25/11	066800103	5.32%	\$37.84
336	S	PAL	1,000	\$3.6309	\$3,630.90	\$182.67	05/25/11	656912102	5.03%	\$1.12
337	S	ARREF	5,000	\$1.0600	\$5,300.00	\$400.00	06/10/11	03074G109	7.55%	\$135.00
338	B	LEI	2,000	\$2.7499	\$5,499.80	\$277.38	06/27/11	549333201	5.04%	\$10.29
339	B	LEI	2,000	\$2.7685	\$5,537.00	\$277.90	06/27/11	549333201	5.02%	\$2.39
340	B	CIM	800	\$3.5386	\$2,830.88	\$151.83	06/27/11	16934Q109	5.36%	\$1.05
341	B	SIRI	2,000	\$2.2300	\$4,460.00	\$262.19	07/20/11	82967N108	5.88%	\$39.19
342	S	SNV	2,500	\$1.9921	\$4,980.25	\$308.39	07/25/11	87161C105	6.19%	\$59.38
343	B	ATNAF	5,000	\$0.6742	\$3,371.00	\$273.68	07/26/11	04957F101	8.12%	\$1.86
344	S	CGR	2,000	\$1.8900	\$3,780.00	\$252.12	07/26/11	182873109	6.67%	\$105.13
345	S	CGR	2,000	\$1.8916	\$3,783.20	\$252.17	07/26/11	182873109	6.67%	\$63.12
346	B	UAMY	1,000	\$3.6100	\$3,610.00	\$182.36	07/26/11	911549103	5.05%	\$63.01
347	S	CTIC	2,500	\$1.2000	\$3,000.00	\$190.00	08/05/11	150934602	6.33%	\$40.00
348	S	PIP	2,000	\$1.8740	\$3,748.00	\$251.65	08/09/11	71714G102	6.71%	\$64.25
349	B	UBAA	5,000	\$0.9810	\$4,905.00	\$396.40	08/10/11	91707P208	8.08%	\$151.15
350	B	UBAA	5,000	\$0.9962	\$4,981.00	\$402.48	08/10/11	91707P208	8.08%	\$153.43
351	B	ETAK	1,000	\$2.7500	\$2,750.00	\$169.63	08/12/11	286202205	6.17%	\$32.13
352	B	SONS	1,500	\$2.4700	\$3,705.00	\$217.01	08/15/11	835916107	5.86%	\$31.76
353	S	ATNAF	1,500	\$0.7279	\$3,639.50	\$295.16	08/16/11	04957F101	8.11%	\$23.33
354	S	CGR	2,000	\$1.6716	\$3,343.20	\$245.66	08/16/11	182873109	7.35%	\$78.50

Schedule A

[illegible]