

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20140421360-01**

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

RE: Vandham Securities Corp., Respondent
Broker/Dealer
CRD No. 26258

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

I.

ACCEPTANCE AND CONSENT

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

BACKGROUND

The firm has been a member of FINRA since May 23, 1990, and its registration remains in effect. The firm has no relevant disciplinary history.

SUMMARY

In Review No. 20140421360, the Department of Market Regulation staff ("the staff") conducted an OTC Securities order protection review involving the firm, for the time period January 1, 2014 through March 31, 2014 ("the first review period").

In Review No. 20150469540, the staff conducted an OTC Securities order protection review involving the firm, for the time period October 1, 2014 through March 31, 2015 ("the second review period").

As described further below, during these review periods, the firm committed the following violations.¹

FACTS AND VIOLATIVE CONDUCT BY RESPONDENT

In connection with Review No. 20140421360:

1. During the first review period, in 97 instances, the firm accepted and held 84 customer orders, and failed to execute or immediately execute customer orders in OTC Securities up to the size and/or at the same or a better price that the firm executed or satisfied the customer orders. In addition, in 12 instances, the firm failed to execute customer orders in OTC Securities fully and promptly. These instances are reflected on Exhibit A, which is attached hereto. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rules 5320 and 2010.

In connection with Review No. 20150469540:

2. During the second review period, in 44 instances, the firm accepted and held 46 customer orders, and failed to execute or immediately execute customer orders in OTC Securities up to the size and/or at the same or a better price that the firm executed or satisfied the customer orders. These instances are reflected on Exhibit B, which is attached hereto. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rules 5320 and 2010.

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

A censure;

A fine of \$17,500 (\$7,500 for the order protection violations cited in Review No. 20140421360 and \$10,000 for the order protection violations cited in Review No. 20150469540); and

Restitution to the investors listed on Exhibits A and B attached hereto, in the total combined amount of \$734.22, plus interest at the rate set forth in Section 6621(a) of the Internal Revenue Code, 26 U.S.C. 6621(a)(2), from the date of the violative conduct until the date this AWC is accepted by the National Adjudicatory Council ("NAC").

¹ A systems issue contributed to limit order display violations committed by the firm during the review period of April 1, 2014 through June 30, 2014, and those limit order display violations were previously resolved by the firm through the acceptance of an AWC and the payment of a separate fine for the limit order display violations on April 1, 2016 (20120352200 (incl. 20130367100; 20130389990; 20140423060; 20150443056; and 20140397940)). 20140421360 (incl. 20150469540) (GEJ)

- A registered principal of the firm shall submit satisfactory proof of payment of the restitution, or of reasonable and documented efforts undertaken to effect restitution, to the **COMPLIANCE ASSISTANT, LEGAL SECTION, MARKET REGULATION DEPARTMENT, 9509 KEY WEST AVENUE, ROCKVILLE, MD 20850** no later than 120 days after acceptance of this AWC. If, for any reason, Respondent cannot locate any customer after reasonable and documented efforts within such period, or such additional period agreed to by the staff, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed-property or abandoned-property fund for the state in which the customer last resided. Respondent shall provide satisfactory proof of such action to FINRA in the manner described above, within 14 days of forwarding the undistributed restitution and interest to the appropriate state authority.

The imposition of a restitution order or 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.

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

The firm specifically and voluntarily waives any right to claim that the firm is unable to pay, now or 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.

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

II.

WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a Formal Complaint issued specifying the allegations against the firm;
- B. To be notified of the Formal 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 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 Chief Legal Officer, 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, 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;
- 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 accordance with FINRA Rule 8313;
 - 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and
 - 4. The firm may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or

indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. The firm may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects the firm's: (i) testimonial obligations or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

- D. The firm may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. The firm understands that it may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

The undersigned, on behalf of the firm, certifies that a person duly authorized to act on its behalf has read and understood all of the provisions to 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.

9/26/2016
Date

Vandham Securities Corp.

By: Frank P. Catrini

Name: FRANK P. CATRINI

Title: Chairman & CEO

Reviewed by:

[Signature]
Counsel for Respondent

Accepted by FINRA:

9/27/16
Date

October 3, 2016

[Signature]
James J. Nixon

Chief Litigation Counsel

Market Regulation

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

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Part I: Triggering Transactions																Part II: Order Details																Part III: Staff Analysis		
																																Order Protection Violation		
Item #	Exception #	Original Exception #	Trade Report Date	Trade Report Time	Execution Time	Firm	Capacity	Side	Trade Vol	Issue Symbol	Trade Price	Counter Party Firm ID	Counter Party Capacity	Market Center	Branch Sequence ID / Exchange Order ID	Final Order Letter	Original Order Letter	Event Type	Order Received Date	Order Received Time	Desk Received Time	MPID	Order to Buy/Sell	Quantity	Issue Symbol	Order Type	Limit Price	Firm Order ID	Account Type Code	TIF	Trading Ahead Violation	Failure to Execute a Marketable Customer Order Fully and Promptly	Restitution	
45	55		3/18/14	09:30:01	9:30:01	VNDM	P	B	875	MJNA	0.32	B/D	A	u	1403189900001017979	AM		NW	3/18/14	08:05:45			VNDM	B	1,000	MJNA	L	0.321	1403189900001007240	U	DAY	Yes	Yes	N/A
																AP		NW	3/18/14	08:06:28			VNDM	B	200	MJNA	L	0.3206	1403189900001007305	U	DAY	Yes	Yes	N/A
																AO		NW	3/18/14	08:32:00			VNDM	B	220	MJNA	L	0.32	1403189900001009826	U	DAY	Yes	Yes	N/A
46	56		3/18/14	09:30:01	9:30:01	VNDM	P	B	100	MJNA	0.32	B/D	A	u	1403189900001018281	AM		NW	3/18/14	08:05:45			VNDM	B	1,000	MJNA	L	0.321	1403189900001007240	U	DAY	Yes	Yes	N/A
																AP		NW	3/18/14	08:06:28			VNDM	B	200	MJNA	L	0.3206	1403189900001007305	U	DAY	Yes	Yes	N/A
																AO		NW	3/18/14	08:32:00			VNDM	B	220	MJNA	L	0.32	1403189900001009826	U	DAY	Yes	Yes	N/A
47	57		3/18/14	09:30:01	9:30:01	VNDM	P	S	4,500	MJNA	0.325	B/D	A	u	1403189900001018069	AQ		NW	3/18/14	08:31:11			VNDM	SL	5,000	MJNA	M		1403189900001009749	U		Yes	No	\$22.50
48	58	28	3/18/14	13:05:20	13:05:20	VNDM	P	B	545	MJNA	0.31	B/D	A	u	1403189900001176976	AR	S	NW	3/18/14	11:03:08			VNDM	B	150	MJNA	L	0.31	1403189900001117620	U	DAY	Yes	Yes	N/A
																AS	T	NW	3/18/14	12:29:46			VNDM	B	138	MJNA	L	0.31	1403189900001159622	U	DAY	Yes	Yes	N/A
49	59	29	3/18/14	14:49:24	14:30:14	VNDM	P	B	400	APLPP	25.10	B/D	P	u	1403189900001211019	AT	U	NW	3/18/14	14:28:27			VNDM	B	400	APLPP	M		1403189900001210127	U		Yes	No	\$20.00
50	60		3/19/14	09:30:22	9:30:22	VNDM	P	B	2,947	MJNA	0.314	B/D	A	u	1403199900001048698	AU		NW	3/19/14	08:01:30			VNDM	B	100	MJNA	L	0.32	1403199900001008610	U	DAY	Yes	No	N/A
																AV		NW	3/19/14	08:04:53			VNDM	B	5,000	MJNA	L	0.314	1403199900001009036	U	DAY	Yes	No	N/A
																AW		NW	3/19/14	09:02:42			VNDM	B	130	MJNA	L	0.314	1403199900001017049	U	DAY	Yes	Yes	N/A
51	61		3/19/14	09:38:00	9:38:00	VNDM	P	B	5,000	HEMP	0.118	B/D	P	u	10004850	AX		NW	3/19/14	09:10:59			VNDM	B	5,000	HEMP	L	0.12	1403199900001019146	U	DAY	Yes	No	\$10.00
52	62	30	3/19/14	12:35:01	12:35:01	VNDM	P	B	5,000	HEMP	0.119	B/D	P	u	10043268	AY	V	NW	3/19/14	12:34:24			VNDM	B	20,000	HEMP	L	0.119	1403199900001126674	U	DAY	Yes	No	N/A
53	63		3/19/14	15:22:38	15:22:37	B/D	P	S	2,500	HEMP	0.1176	VNDM	P	u	10069872	AZ		NW	3/19/14	15:22:13			VNDM	B	2,500	HEMP	L	0.118	1403199900001195439	U	DAY	Yes	No	N/A
54	64	31	3/20/14	10:22:42	10:22:42	VNDM	P	B	100	DKILY	102.01	B/D	P	u	10017466	BA	W	NW	3/20/14	10:20:15			VNDM	B	200	DKILY	L	102.01	1403209900001093625	U	DAY	Yes	No	N/A
55	65		3/21/14	09:30:09	9:30:09	VNDM	P	B	200	MJNA	0.32	B/D	A	u	1403219900001052442	BB		NW	3/21/14	07:46:03			VNDM	B	5,000	MJNA	M		1403219900000987214	U		Yes	No	\$1.28
																BC		NW	3/21/14	08:31:00			VNDM	B	137	MJNA	L	0.32	1403219900001018208	U	DAY	Yes	No	
																BD		NW	3/21/14	08:48:48			VNDM	B	5,000	MJNA	L	0.35	1403219900001020582	U	DAY	Yes	No	
56	66		3/21/14	09:30:13	9:30:13	VNDM	P	B	1,077	MJNA	0.32	B/D	A	u	1403219900001053011	BE		NW	3/21/14	07:46:03			VNDM	B	5,000	MJNA	M		1403219900000987214	U		Yes	No	
																BF		NW	3/21/14	08:31:00			VNDM	B	137	MJNA	L	0.32	1403219900001018208	U	DAY	Yes	No	
57	67		3/21/14	14:05:54	14:05:54	B/D	P	S	645	MJNA	0.317	VNDM	P	u	10049771	BG		NW	3/21/14	14:05:23			VNDM	B	645	MJNA	L	0.32	1403219900001185917	U	DAY	Yes	No	N/A
58	68		3/24/14	09:30:01	9:30:01	VNDM	P	B	1,000	MJNA	0.309	B/D	A	u	1403249900001026828	BH		NW	3/24/14	08:09:00			VNDM	B	100	MJNA	L	0.316	1403249900001010753	U	DAY	Yes	No	\$17.00
																BI		NW	3/24/14	08:30:09			VNDM	B	5,000	MJNA	L	0.32	1403249900001012650	U	DAY			
																BJ		NW	3/24/14	08:30:43			VNDM	B	300	MJNA	L	0.32	1403249900001012699	U	DAY			
																BK		NW	3/24/14	08:31:07			VNDM	B	100	MJNA	L	0.32	1403249900001012737	U	DAY			
																BL		NW	3/24/14	08:31:21			VNDM	B	100	MJNA	L	0.3199	1403249900001012759	U	DAY			
																BM		NW	3/24/14	08:31:24			VNDM	B	100	MJNA	L	0.3199	1403249900001012763	U	DAY			
																BN		NW	3/24/14	08:31:50			VNDM	B	759	MJNA	L	0.33	1403249900001012811	U	DAY			
																BO		NW	3/24/14	08:32:30			VNDM	B	1,500	MJNA	L	0.3199	1403249900001013010	U	DAY			
59	69		3/24/14	09:30:02	9:30:02	VNDM	P	S	759	MJNA	0.326	B/D	A	u	1403249900001026852	BP		NW	3/24/14	07:46:03			VNDM	SL	1,000	MJNA	M		1403249900000985049	U		Yes	No	\$12.90
60	71		3/24/14	09:59:06	9:59:06	VNDM	P	B	200	MJNA	0.315	B/D	P	u	10012291	BR		NW	3/24/14	08:31:21			VNDM	B	100	MJNA	L	0.3199	1403249900001012759	U	DAY	Yes	No	N/A
																BS		NW	3/24/14	08:31:24			VNDM	B	100	MJNA	L	0.3199	1403249900001012763	U	DAY			
61	72		3/25/14	09:30:01	9:30:01	VNDM	P	B	136	MJNA	0.30	B/D	A	u	1.40326E+18	BT	Y	NW	3/25/14	08:21:02			VNDM	B	100	MJNA	L	0.31	1403259900001015222	U	DAY	Yes	No	N/A
62	73	33	3/25/14	09:30:01	9:30:01	VNDM	P	B	500	MJNA	0.30	B/D	A	u	1403259900001025475	BU	Z	NW	3/25/14	08:30:18			VNDM	B	645	MJNA	L	0.31	1403259900001016178	U	DAY	Yes	No	\$6.45
63	74		3/25/14	09:30:01	9:30:01	VNDM	P	B	1,500	MJNA	0.30	B/D	A	u	1.40326E+18	BV		NW	3/25/14	08:30:54			VNDM	B	413	MJNA	L	0.32	1403259900001016237	U	DAY	Yes	No	\$4.13
64	75		3/25/14	09:30:01	9:30:01	VNDM	P	B	4,050	MJNA	0.30	B/D	A	u	1.40326E+18	BW	AA	NW	3/25/14	08:59:39			VNDM	B	1,475	MJNA	L	0.33	1403259900001018903	U	DAY	Yes	No	\$14.75
65	76		3/25/14	10:05:20	10:05:20	VNDM	P	B	50,000	HEMP	0.106	B/D	P	u	10013710	BX	AB	NW	3/25/14	10:04:21			VNDM	B	678,000	HEMP	L	0.11	1403259900001069061	U	DAY	Yes	No	\$317.24
66	77		3/25/14	10:05:26	10:05:26	VNDM	P	B	20,000	HEMP	0.1065	B/D	P	u	10013745																			
67	78		3/25/14	10:05:48	10:05:48	VNDM	P	B	10,600	HEMP	0.1065	B/D	P	u	10013844																			
68	79		3/25/14	10:06:15	10:06:15	VNDM	P	B	33,500	HEMP	0.1074	B/D	P	u	10013940																			
69	80		3/25/14	10:06:51	10:06:51	VNDM	P	B	5,000	HEMP	0.1085	B/D	P	u	10014118																			
70	81		3/25/14	10:07:06	10:07:06	VNDM	P	B	5,000	HEMP	0.1098	B/D	P	u	10014192																			
71	82		3/25/14	10:07:19	10:07:19	VNDM	P	B	10,000	HEMP	0.1075	B/D	P	u	10014243																			
72	83	34	3/25/14	10:07:28	10:07:28	VNDM	P	B	10,000	HEMP	0.1075	B/D	P	u	10014287																			
73	84		3/25/14	10:07:31	10:07:31	VNDM	P	B	24,000	HEMP	0.1087	B/D	P	u	10014304																			
74	85	35	3/25/14	10:07:38	10:07:38	VNDM	P	B	8,500	HEMP	0.107	B/D	P	u	10014344																			
75	86		3/25/14	10:07:53	10:07:53	VNDM	P	B	10,000	HEMP	0.1099	B/D	P	u	10014413																			
76	87		3/25/14	10:07:55	10:07:55	VNDM	P	B	176,200	HEMP	0.11	B/D	P	u	10014423																			
77	88		3/25/14	10:08:06	10:08:06	VNDM	P	B	31,451	HEMP	0.11	B/D	P	u	10014464																			
78	89	36	3/25/14	10:09:08	10:09:08	VNDM	P	B	5,000	HEMP	0.11	B/D	P	u	10014724																			
79	90	37	3/25/14	10:13:04	10:13:04	VNDM	P	B	5,280	HEMP	0.114	B/D	P	u	10015754																			
80	91	38	3/25/14	10:17:12	10:17:12	VNDM	P	B	5,000	HEMP	0.1174	B/D	P	u	10016801																			

Part I: Triggering Transactions																Part II: Order Details																Part III: Staff Analysis			
																																Order Protection Violation			
Item #	Exception #	Original Exception #	Trade Report Date	Trade Report Time	Execution Time	Firm	Capacity	Side	Trade Vol	Issue Symbol	Trade Price	Counter Party Firm ID	Counter Party Capacity	Market Center	Branch Sequence ID / Exchange Order ID	Final Order Letter	Original Order Letter	Event Type	Order Received Date	Order Received Time	Desk Received Time	MPID	Order to Buy/Sell	Quantity	Issue Symbol	Order Type	Limit Price	Firm Order ID	Account Type Code	TIF	Trading Ahead Violation	Failure to Execute a Marketable Customer Order Fully and Promptly	Restitution		
89	102	46	3/27/14	09:30:05	9:30:05	VNDM	P	B	2,607	MJNA	0.295	B/D	A	u	1403279900001052937	CE	AH	NW	3/27/14	08:06:02		VNDM	B	900	MJNA	L	0.32	1403279900001017009	U	DAY	Yes	No	\$4.50		
																CF	AI	NW	3/27/14	08:30:44		VNDM	B	150	MJNA	L	0.30	1403279900001019810	U	DAY	Yes	No	N/A		
90	103	47	3/27/14	13:43:01	13:43:01	VNDM	P	B	800	MJNA	0.2825	B/D	P	u	10047576	CG	AJ	NW	3/27/14	13:42:28		VNDM	B	800	MJNA	L	0.30	1403279900001236885	U	DAY	Yes	No	N/A		
91	104		3/27/14	15:18:39	15:18:37	B/D	P	B	100	MPSYF	94.70	VNDM	P	u	10058288	CH		NW	3/27/14	15:14:57		VNDM	SL	1,000	MPSYF	M		1403279900001281321	U		Yes	No	\$20.00		
92	105	48	3/27/14	15:30:45	15:30:45	VNDM	P	B	100	KSANF	14.32	B/D	P	u	10059974	CI	AK	NW	3/27/14	15:28:33		VNDM	B	100	KSANF	M		1403279900001288537	U		Yes	No	N/A		
93	106		3/28/14	09:30:18	9:30:18	VNDM	P	B	1,000	MJNA	0.28	B/D	A	u	1403289900001057925	CJ		NW	3/28/14	07:46:03		VNDM	B	6,500	MJNA	M		1403289900000993334	U		Yes	No	\$5.00		
																CK		NW	3/28/14	08:30:29		VNDM	B	350	MJNA	L	0.28	1403289900001021920	U	DAY	Yes	Yes	N/A		
																CL		NW	3/28/14	08:50:00		VNDM	B	140	MJNA	L	0.28	1403289900001023824	U	DAY	Yes	Yes	N/A		
94	107	49	3/28/14	09:30:50	9:30:49	VNDM	P	S	688	LDHL	0.41	B/D	P	u	10000911	CM	AL	NW	3/28/14	09:26:57		VNDM	SS	2,700	LDHL	L	0.41	1403289900001031995	U	DAY	Yes	No	N/A		
95	108		3/28/14	13:16:34	13:16:34	VNDM	P	B	140	MJNA	0.262	B/D	A	u	1403289900001193689	CN		CR	3/28/14	13:16:27		VNDM	B	7,000	MJNA	L	0.265	1403289900001193412	U	DAY	Yes	No	\$3.57		
96	109		3/28/14	13:16:46	13:16:46	B/D	P	S	6,860	MJNA	0.2625	VNDM	P	u	10035036																				
97	110	50	3/28/14	15:59:08	15:59:08	VNDM	P	B	2,000	MJNA	0.262	B/D	A	u	1403289900001308893	CO	AM	NW	3/28/14	15:53:24		VNDM	B	528	MJNA	L	0.2621	1403289900001300725	U	DAY	Yes	No	N/A		
																																Total Restitution:		\$573.02	

Part I: Triggering Transactions															Part II: Order Details												Part III: Staff's Analysis	
Item #	Exception #	Original Exception #	Trade Report Date	Trade Report Time	Execution Time	Firm	Capacity	Side	Trade Vol	Issue Symbol	Trade Price	Counter party ID	Counter party Capacity	Branch Sequence ID / Exchange Order ID	Order Letter	Event Type	Order Received Date	Order Received Time	MPID	Order to Buy/Sell	Quantity	Issue Symbol	Order Type	Limit Price	Firm Order ID	TIF	Trading Ahead Violation	Restitution Amount
1	3	3	10/10/2014	12:28:59	12:28:59	VNDM	P	S	49,500	BLAP	0.01	B/D	P	10019570	C	NW	10/9/2014	15:47:03	VNDM	SL	156,000	BLAP	L	0.01	1410099900000872106	GTC	Yes	N/A
2	4	4	10/13/2014	12:01:34	12:01:34	VNDM	P	S	7,000	PLRM	11.20	B/D	P	10018971	D	NW	10/13/2014	11:04:20	VNDM	SL	8,040	PLRM	L	11.20	1410139900000658707	GTC	Yes	N/A
3	5	5	10/14/2014	09:45:09	9:45:09	VNDM	P	B	10,000	HEMP	0.026	B/D	P	10004501	E	CR	10/13/2014	14:23:06	VNDM	B	80,000	HEMP	L	0.026	1410139900000767157	GTC	Yes	N/A
4	6	6	10/16/2014	09:30:05	9:30:05	VNDM	P	S	50,000	HEMP	0.0264	B/D	P	10000345	F	NW	10/16/2014	8:01:02	VNDM	SL	10,000	HEMP	L	0.001	1410169900000546937	GTC	Yes	\$9.00
5	7	7	10/16/2014	09:30:15	9:30:15	VNDM	P	S	50,000	HEMP	0.0264	B/D	P	10000545													Yes	
6	8c		10/20/2014		13:32:28	B/D		S	10,000	HEMP	0.0304	VNDM	P		G1	NW	10/20/2014	13:32:07	VNDM	B	10,000	HEMP	L	0.0309	1410209900000700000		Yes	\$4.00
7	9	9	10/21/2014	10:38:02	10:38:02	B/D	P	B	10,000	HEMP	0.033	VNDM	P	10011411	H	NW	10/21/2014	10:18:24	VNDM	SL	32,800	HEMP	L	0.033	1410219900000638294	DAY	Yes	N/A
8	10	10	10/21/2014	11:20:54	11:20:54	B/D	P	S	17,050	HEMP	0.0347	VNDM	P	10016232	I	CR	10/21/2014	11:20:38	VNDM	B	30,000	HEMP	L	0.035	1410219900000684890	DAY	Yes	\$1.70
9	11	11	10/22/2014	09:31:04	9:31:04	VNDM	P	B	300	MJNA	0.1545	B/D	A	1410229900000599128	J	NW	10/22/2014	9:14:52	VNDM	B	5,750	MJNA	L	0.16	1410229900000558842	DAY	Yes	N/A
10	12	12	10/22/2014	15:07:58	15:07:58	B/D	P	S	2,000	WMIH	2.165	VNDM	P	10031147	K	NW	10/22/2014	15:07:20	VNDM	B	2,000	WMIH	M		1410229900000806032		Yes	\$10.00
11	13	13	10/23/2014	11:13:09	11:13:09	B/D	P	S	10,000	FFFC	0.0001	VNDM	P	10014381	L	NW	10/22/2014	10:26:18	VNDM	B	218,700	FFFC	L	0.0001	1410229900000640927	GTC	Yes	N/A
12	15	15	10/29/2014	09:30:19	9:30:19	VNDM	P	B	3,925	MJNA	0.16	B/D	A	1410299900000594372	N	NW	10/29/2014	8:00:46	VNDM	B	600	MJNA	L	0.17	1410299900000548575	DAY	Yes	\$2.94
13	16	16	11/3/2014	10:45:23	10:45:23	B/D	P	S	5,000	MJNA	0.185	VNDM	P	10010748	O	NW	11/3/2014	10:37:59	VNDM	B	5,426	MJNA	L	0.185	1411029900000636405	DAY	Yes	N/A
14	17	17	11/7/2014	13:33:00	13:33:00	VNDM	P	S	15,000	MJNA	0.1539	B/D	P	10019277	P	NW	11/7/2014	12:34:14	VNDM	SL	500	MJNA	L	0.1538	1411079900000714387	DAY	Yes	N/A
15	18	18	11/7/2014	14:03:02	14:03:02	VNDM	P	S	600	MJNA	0.1539	B/D	P	10021220													Yes	
16	19	19	11/10/2014	09:53:13	9:53:13	B/D	P	S	500	MJNA	0.1559	VNDM	P	10004484	Q	NW	11/10/2014	9:52:55	VNDM	B	300	MJNA	L	0.1589	1411109900000625794	DAY	Yes	N/A
17	20	20	11/12/2014	13:05:24	13:05:24	B/D	P	S	5,000	DULMF	0.38	VNDM	P	10018390	R	NW	11/12/2014	13:05:00	VNDM	B	6,579	DULMF	M		1411129900000752863		Yes	N/A
18	21	21	11/13/2014	11:47:50	11:47:49	B/D	P	S	400	WMIH	1.945	VNDM	P	10014682	S	NW	11/13/2014	9:38:59	VNDM	B	2,000	WMIH	L	1.95	1411139900000618337	DAY	Yes	\$2.00
19	22	22	11/14/2014	15:21:34	15:21:33	B/D	P	S	100	OCINY	35.25	VNDM	P	10028668	T	NW	11/14/2014	15:21:12	VNDM	B	100	OCINY	L	35.25	1411149900000799118	DAY	Yes	N/A
20	23	23	11/17/2014	10:30:28	10:30:28	B/D	P	B	1,700	SGSVF	0.361	VNDM	P	10008604	U	NW	11/17/2014	10:29:08	VNDM	SL	1,700	SGSVF	M		14111799000002419900		Yes	\$6.80
21	24	24	11/18/2014	13:05:22	13:05:22	B/D	P	B	5,000	CCTC	0.072	VNDM	P	10018796	V	NW	11/18/2014	13:04:51	VNDM	SL	5,000	CCTC	M		1411189900000728862		Yes	N/A
22	25	25	11/18/2014	09:30:29	9:30:29	VNDM	P	B	160	MJNA	0.13	B/D	A		W	NW	11/18/2014	8:01:30	VNDM	B	150	MJNA	L	0.14	1411189900000557232	DAY	Yes	\$1.50
															X	NW	11/18/2014	9:28:19	VNDM	B	10,000	MJNA	L	0.133	1411189900000574572	DAY		N/A
23	26	26	11/18/2014	09:30:41	9:30:41	VNDM	P	B	520	MJNA	0.135	B/D	A		W	NW	11/18/2014	8:01:30	VNDM	B	150	MJNA	L	0.14	1411189900000557232	DAY	Yes	N/A
24	27	27	11/18/2014	09:30:41	9:30:41	VNDM	P	B	602	MJNA	0.135	B/D	A														Yes	
25	28	28	11/18/2014	09:30:41	9:30:41	VNDM	P	B	1,078	MJNA	0.135	B/D	A														Yes	
26	29	29	11/18/2014	09:30:51	9:30:51	VNDM	P	B	3,500	MJNA	0.1351	B/D	A														Yes	
27	31	31	11/25/2014	09:44:44	9:44:44	B/D	P	S	1,000	MJNA	0.145	VNDM	P	10003379	Z	NW	11/25/2014	8:03:52	VNDM	B	420	MJNA	L	0.149	1411259900000381467	DAY	Yes	N/A
															AA	NW	11/25/2014	8:30:05	VNDM	B	500	MJNA	L	0.149	1411259900000385674	DAY		N/A
28	32	32	11/26/2014	09:54:53	9:54:53	VNDM	P	S	1,600	HEMP	0.0372	B/D	P	10004200	AB	CR	11/26/2014	9:47:05	VNDM	SL	10,000	HEMP	L	0.0371	1411269900000441313	GTC	Yes	N/A
29	33	33	12/1/2014	09:30:07	9:30:07	VNDM	P	B	6,000	MJNA	0.141	B/D	A	1412019900000420147	AC	NW	12/1/2014	8:03:01	VNDM	B	200	MJNA	L	0.1425	1412019900000377135	DAY	Yes	N/A
30	34	34	12/2/2014	09:30:15	9:30:15	VNDM	P	B	300	MJNA	0.143	B/D	A	1412029900000424197	AD	NW	12/2/2014	8:04:04	VNDM	B	480	MJNA	L	0.143	1412029900000378501	DAY	Yes	N/A
31	35	35	12/3/2014	11:18:55	11:18:55	VNDM	P	B	500,000	HEMP	0.03175	B/D	A	1412039900000502749	AE	NW	11/11/2014	9:48:06	VNDM	B	5,000	HEMP	L	0.032	1411119900000627164	GTC	Yes	\$1.25
															AF	CR	12/2/2014	11:04:55	VNDM	B	10,000	HEMP	L	0.032	1412029900000506396	GTC		\$2.50
															AG	NW	12/2/2014	13:21:35	VNDM	B	1,000	HEMP	L	0.032	1412029900000602835	GTC		N/A
															AH	NW	11/24/2014	12:40:17	VNDM	B	1,000	HEMP	L	0.03	1411249900000590937	GTC		N/A
32	36	36	12/5/2014	12:08:47	12:08:47	VNDM	P	B	500,000	HEMP	0.02995	B/D	P	1412059900000554017	AI	NW	11/26/2014	11:27:56	VNDM	B	1,600	HEMP	L	0.03	1411269900000508689	GTC	Yes	N/A
33	37	37	12/8/2014	09:30:15	9:30:15	VNDM	P	B	5,518	MJNA	0.142	B/D	A	1412089900000424826	AJ	NW	12/8/2014	8:15:57	VNDM	B	1,000	MJNA	L	0.15	1412089900000381471	DAY	Yes	\$2.50
34	39a		12/15/2014		10:05:02	B/D	P	B	5,000	EORBF	0.201	VNDM	P	10005975	AL	NW	12/15/2014	10:04:18	VNDM	SL	200,000	EORBF	L	0.19	1412159900000469286	DAY	Yes	\$100.00
35	39b		12/15/2014		10:05:27	B/D	P	B	2,500	EORBF	0.201	VNDM	P	10005975													Yes	
36	39c		12/15/2014		10:05:27	B/D	P	B	2,500	EORBF	0.201	VNDM	P	10005975													Yes	
37	39d	39	12/15/2014	10:05:35	10:05:35	B/D	P	B	7,500	EORBF	0.201	VNDM	P	10005975													Yes	
38	39e		12/15/2014		10:05:52	B/D	P	B	7,500	EORBF	0.201	VNDM	P	10005975													Yes	
39	45	45	2/18/2015	09:34:36	9:34:36	VNDM	P	B	50,000	HEMP	0.0306	B/D	A	1502189900000448809	AQ	CR	2/17/2015	15:08:42	VNDM	B	5,000	HEMP	L	0.031	1502179900000639160	GTC	Yes	\$2.00
40	46	46	2/19/2015	10:07:15	10:07:15	VNDM	P	B	300,000	HEMP	0.03085	B/D	A	1502199900000483096	AR	NW	2/19/2015	9:51:41	VNDM	B	100	HEMP	L	0.0309	1502199900000470440	DAY	Yes	N/A
41	47	47	2/20/2015	13:32:41	13:32:41	B/D	P	B	5,000	SNXG	0.246	VNDM	P	10021453	AS	NW	2/20/2015	13:32:30	VNDM	SL	150,000	SNXG	L	0.245	1502209900000597304	DAY	Yes	N/A
42	48	48	2/20/2015	14:02:35	14:02:35	B/D	P	B	52,000	SNXG	0.245	VNDM	P	10023262	AT	NW	2/20/2015	14:02:31	VNDM	SL	100,000	SNXG	L	0.245	1502209900000611106	DAY	Yes	N/A
43	49	499																										