

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20150444762-01**

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

RE: Coastal Equities, Inc., Respondent
Broker-Dealer
CRD No. 23769

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Coastal Equities, 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 Respondent alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondent 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

Respondent became a member of FINRA in 1989 and its registration remains in effect. The firm has no relevant disciplinary history.

SUMMARY

In connection with STAR No. 20150444762, the Fixed Income Team of the Department of Market Regulation (the "Staff") reviewed Respondent's compliance with FINRA Rules 2010, 2121 and 3110 (for conduct after November 30, 2014) and NASD Rule 3010 (for conduct before December 1, 2014) during the period from October 1, 2014 through December 31, 2015 (the "4Q14-4Q15 review period").

In connection with STAR No. 20160511245, Staff reviewed Respondent's compliance with FINRA Rules 2010, 2121 and 3110 during the period from April 1, 2016 through September 30, 2016 (the "2Q16-3Q16 review period").

As a result of its reviews, Staff found that the firm violated FINRA Rules 2010 and 2121 and related supervision requirements, as described below.

FACTS AND VIOLATIVE CONDUCT

1. FINRA Rule 2121 provides, in relevant part, that if a member buys for his own account from his customer, or sells for his own account to his customer, he shall buy or sell at a price which is fair, taking into consideration all relevant circumstances, including market conditions with respect to such security at the time of the transaction, the expense involved, and the fact that he is entitled to a profit; and if he acts as agent for his customer in any such transaction, he shall not charge his customer more than a fair commission or service charge, taking into consideration all relevant circumstances, including market conditions with respect to such security at the time of the transaction, the expense of executing the order and the value of any service he may have rendered by reason of his experience in and knowledge of such security and the market therefor.

Matter No. 20150444762

2. During the 4Q14-4Q15 review period, in 149 transactions, Respondent bought and/or sold Corporate Bond securities for its own account from and/or to a customer at an aggregate price (including any markup or markdown) that was not fair and reasonable, taking into consideration all relevant circumstances. The transactions are identified in Exhibit A, which is attached. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rules 2121 and 2010.

Matter No. 20160511245

3. During the 2Q16-3Q16 review period, in 66 transactions, Respondent bought and/or sold Corporate Bond securities for its own account from and/or to a customer at an aggregate price (including any markup or markdown) that was not fair and reasonable, taking into consideration all relevant circumstances. The transactions are identified in Exhibit B, which is attached. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rules 2121 and 2010.

Matter Nos. 20150444762 and 20160511245

4. The firm's supervisory system concerning fair pricing of Corporate Bond securities did not provide for supervision reasonably designed to achieve compliance with respect to the applicable securities laws and regulations, and FINRA rules.
5. Specifically, the firm's corporate bond exception report was insufficiently designed as it did not calculate mark-ups/mark-downs in percentage terms, only in absolute dollar values; and the report did not account for trade desk markups/markdowns that were added to registered representative markups/markdowns. Additionally, the firm did not make its corporate bond

exception report available to the firm's Corporate Debt and Municipals Principal charged with reviewing the reasonableness of markups/markdowns. Finally, the firm's Corporate Debt and Municipals Principal also acted as the firm's corporate debt trader, and his conduct in adding trade desk markups/markdowns was not subjected to review during the review periods.

6. The conduct described in paragraphs 4 and 5 constitutes violations of FINRA Rules 2010 and 3110 (for conduct after November 30, 2014) and NASD Rule 3010 (for conduct before December 1, 2014).

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

- A censure;
- A fine of \$90,000 for violations of FINRA Rules 2121, 2010 and 3110 (for conduct after November 30, 2014) and NASD Rule 3010 (for conduct before December 1, 2014);¹
- Restitution to the firm's customers in the amount of \$60,244.46 (\$40,369.58 for the transactions from matter 20150444762 listed in Exhibit A; and \$19,874.88 for the transactions from matter 20160511245 listed in Exhibit B) 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"). 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 A VENUE, ROCKVILLE, MD 20850 or in an e-mail from a work-related account of the registered principal to MarketRegulationComp@finra.org, no later than 120 days after acceptance of this AWC. If for any reason, Respondent cannot locate any customer after reasonable and documented efforts within such period, or such additional period agreed to by the staff, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property or abandoned-property fund for the state in which the customer is known to have last resided. 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; and

Respondent agrees to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. It has submitted an Election of Payment form showing the method by which it proposes to pay the fine imposed.

Respondent specifically and voluntarily waives any right to claim that it is unable to pay,

¹ Pursuant to the General Principles Applicable to all Sanction Determinations contained in the Sanctions Guidelines, FINRA imposed a lower fine in this case after it considered, among other things, the firm's revenues and financial resources. See, Notice to Members 06-55.

now or at any time hereafter, the monetary sanction 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

Respondent 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, respondent 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.

Respondent 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

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

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

April 26, 2018

Date

Respondent
Coastal Equities, Inc.

By: 

Name: Charles F. Reiling III

Title: President

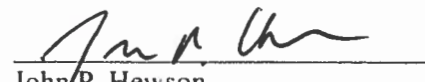
Reviewed by:


Counsel for Respondent

Accepted by FINRA:

4/30/18
Date

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


John P. Hewson
Principal Counsel
FINRA Department of Enforcement

Coastal Equities Inc. ("COAS")
Matter No. 20150444762
Exhibit A - Fair Pricing Violations

Violation Number	Summary Exhibit #	Trade Date - Purchase	Trade Time - Purchase	Trade Date - Sale	Trade Time - Sale	Volume	Bond	CUSIP	Contra 1	Purchase Price	Firm	Contra 2	Sale Price	Percent Profit	Dollar Profit	Proposed Restitution
1	1	10/29/2014	16:38:04	10/29/2014	16:38:04	40,000	WLT4062096	93317QAH8	C(S)	27.56	COAS	BD(B)	29.00	4.97%	\$ 576.00	\$ 117.80
2	2	10/30/2014	13:12:03	10/30/2014	13:12:03	15,000	DG3992947	256677AC9	C(S)	87.025	COAS	BD(B)	90.25	3.57%	\$ 483.75	\$ 83.75
3	5	11/06/2014	10:37:50	11/06/2014	10:37:50	20,000	AP03695541	179584AL1	C(S)	81.545	COAS	BD(B)	84.985	4.05%	\$ 688.00	\$ 179.71
4	6	11/12/2014	10:13:27	11/12/2014	10:13:27	15,000	MS4007805	61747YDU6	C(S)	97.227	COAS	BD(B)	101.043	3.78%	\$ 572.40	\$ 172.40
5	9	11/25/2014	14:54:10	11/25/2014	14:54:10	20,000	CLF.AA	18683KAA9	BD(S)	69.875	COAS	C(B)	72.965	4.42%	\$ 618.00	\$ 142.07
6a	10a	12/01/2014	15:05:36			108,000	SGMS3950904	80874YAM2	BD(S)	75.00	COAS					
6b	10b			12/01/2014	15:05:36	16,000	SGMS3950904	80874YAM2			COAS	C(B)	78.14	4.19%	\$ 502.40	\$ 102.40
6c	10c			12/01/2014	15:05:36	29,000	SGMS3950904	80874YAM2			COAS	C(B)	78.14	4.19%	\$ 910.60	\$ 260.30
6d	10d			12/01/2014	15:05:36	28,000	SGMS3950904	80874YAM2			COAS	C(B)	78.14	4.19%	\$ 879.20	\$ 251.32
7	11	12/01/2014	15:05:59	12/01/2014	15:05:59	18,000	CLF.AA	18683KAA9	BD(S)	66.94	COAS	C(B)	69.86	4.36%	\$ 525.60	\$ 125.60
8	12	12/03/2014	15:01:02	12/03/2014	15:01:02	20,000	CLF.AA	18683KAA9	BD(S)	67.68	COAS	C(B)	70.505	4.17%	\$ 565.00	\$ 152.32
9	13	12/04/2014	13:51:46	12/04/2014	13:51:46	40,000	CLF.AA	18683KAA9	BD(S)	63.845	COAS	C(B)	66.63	4.36%	\$ 1,114.00	\$ 335.39
10	14	12/09/2014	13:47:29	12/09/2014	13:47:29	30,000	MS4007805	61747YDU6	C(S)	98.00	COAS	BD(B)	101.725	3.66%	\$ 1,117.50	\$ 358.34
11	15	12/10/2014	13:59:02	12/10/2014	13:59:02	19,000	SGMS3950904	80874YAM2	C(S)	68.474	COAS	BD(B)	70.891	3.41%	\$ 459.23	\$ 59.23
12	16	12/11/2014	16:14:25	12/11/2014	16:14:25	27,000	CLF.AC	18683KAC5	C(S)	55.12	COAS	BD(B)	57.80	4.64%	\$ 723.60	\$ 156.68
13	18	12/12/2014	16:04:39	12/12/2014	16:04:39	25,000	MS4007805	61747YDU6	C(S)	98.40	COAS	BD(B)	102.034	3.56%	\$ 908.50	\$ 273.96
14a	19a	12/15/2014	12:34:01			34,000	CLF.AA	18683KAA9	BD(S)	60.913	COAS					
14b	19c			12/15/2014	12:34:01	26,000	CLF.AA	18683KAA9			COAS	C(B)	63.53	4.30%	\$ 680.42	\$ 207.07
15	20	12/15/2014	12:48:23	12/15/2014	12:48:23	20,000	CCCX3917899	20367QAB3	BD(S)	67.013	COAS	C(B)	69.728	4.05%	\$ 543.00	\$ 141.40
16	21	12/16/2014	15:06:38	12/16/2014	15:06:38	17,000	SGMS3950904	80874YAM2	BD(S)	69.625	COAS	C(B)	72.445	4.05%	\$ 479.40	\$ 79.40
17a	22a			12/17/2014	16:15:43	72,000	VZ3926361	92343VBG8			COAS	BD(B)	89.25			
17b	22b	12/17/2014	16:15:43			20,000	VZ3926361	92343VBG8	C(S)	85.945	COAS			3.70%	\$ 661.00	\$ 261.00
17c	22f	12/17/2014	16:15:43			30,000	VZ3926361	92343VBG8	C(S)	85.945	COAS			3.70%	\$ 991.50	\$ 591.50
18a	24a	12/22/2014	12:36:01			87,000	CLF.AA	18683KAA9	BD(S)	60.00	COAS					
18b	24g			12/22/2014	12:36:01	25,000	CLF.AA	18683KAA9			COAS	C(B)	62.50	4.17%	\$ 625.00	\$ 176.68
19	25	12/23/2014	15:06:28	12/23/2014	15:06:28	27,000	SGMS3950904	80874YAM2	BD(S)	70.335	COAS	C(B)	74.895	6.48%	\$ 1,231.20	\$ 663.41
20a	26a	12/29/2014	14:01:15			27,000	CLF.AA	18683KAA9	BD(S)	57.814	COAS					
20b	26c			12/29/2014	14:01:15	20,000	CLF.AA	18683KAA9			COAS	C(B)	60.485	4.62%	\$ 534.20	\$ 134.20
21a	27a			12/30/2014	16:27:00	57,000	SGMS3950904	80874YAM2			COAS	C(B)	74.76	5.10%	\$ 1,744.46	\$ 722.72
21b	27b	12/30/2014	16:23:40			50,000	SGMS3950904	80874YAM2	BD(S)	71.129	COAS					
22	28	01/09/2015	16:31:47	01/09/2015	16:31:47	19,000	SGMS3950904	80874YAM2	C(S)	65.755	COAS	BD(B)	68.391	3.85%	\$ 500.84	\$ 100.84
23a	29a			01/13/2015	16:22:34	45,000	MS4007805	61747YDU6			COAS	BD(B)	102.445			
23b	29b	01/13/2015	16:22:34			25,000	MS4007805	61747YDU6	C(S)	98.635	COAS			3.72%	\$ 952.50	\$ 425.68
23c	29c	01/13/2015	16:22:34			20,000	MS4007805	61747YDU6	C(S)	98.635	COAS			3.72%	\$ 762.00	\$ 340.54
24	30	01/14/2015	16:31:50	01/14/2015	16:31:50	14,000	CCCX3917899	20367QAB3	BD(S)	66.143	COAS	C(B)	69.71	5.39%	\$ 499.38	\$ 99.38
25a	31a	01/16/2015	12:56:31			58,000	RIG.HG	893830BB4	BD(S)	82.00	COAS					
25b	31b			01/16/2015	12:56:31	14,000	RIG.HG	893830BB4			COAS	C(B)	86.00	4.88%	\$ 560.00	\$ 160.00
25c	31c			01/16/2015	12:56:31	17,000	RIG.HG	893830BB4			COAS	C(B)	86.00	4.88%	\$ 680.00	\$ 215.74
26	32	01/20/2015	15:55:25	01/20/2015	15:55:25	26,000	VZ3926361	92343VBG8	C(S)	87.89	COAS	BD(B)	91.385	3.82%	\$ 908.70	\$ 508.70
27a	33a			01/21/2015	16:20:44	25,000	AP03695541	179584AL1			COAS	BD(B)	80.00			
27b	33b	01/21/2015	16:20:44			20,000	AP03695541	179584AL1	C(S)	76.875	COAS			3.91%	\$ 625.00	\$ 225.00
28	34	01/26/2015	10:15:05	01/26/2015	10:12:05	15,000	CLF.AA	18683KAA9	BD(S)	74.25	COAS	C(B)	77.475	4.34%	\$ 483.75	\$ 83.75
29	36	02/25/2015	15:09:41	02/25/2015	15:09:41	103,000	WFT3840081	94707VAC4	BD(S)	91.838	COAS	C(B)	95.178	3.64%	\$ 3,440.20	\$ 960.89

Coastal Equities Inc. ("COAS")
Matter No. 2015044762
Exhibit A - Fair Pricing Violations

Violation Number	Summary Exhibit #	Trade Date - Purchase	Trade Time - Purchase	Trade Date - Sale	Trade Time - Sale	Volume	Bond	CUSIP	Contra 1	Purchase Price	Firm	Contra 2	Sale Price	Percent Profit	Dollar Profit	Proposed Restitution
30a ¹	37a			02/26/2015	11:24:47	55,000	APO3695541	179584AL1			COAS	C(B)	66.24			
30b	37b	02/26/2015	11:24:47			25,000	APO3695541	179584AL1	C(S)	59.871	COAS			7.89%	\$ 1,592.25	\$ 1,192.25
31	38	02/27/2015	15:09:42	02/27/2015	15:09:42	14,000	WFT.GW	94707VAA8	C(S)	92.835	COAS	BD(B)	96.85	4.15%	\$ 562.10	\$ 162.10
32a	39a	03/03/2015	10:38:30			26,000	WFT3840081	94707VAC4	BD(S)	92.85	COAS					
32b	39c			03/03/2015	10:38:30	19,000	WFT3840081	94707VAC4			COAS	C(B)	96.585	4.02%	\$ 709.65	\$ 255.56
33	40	03/03/2015	16:07:23	03/03/2015	16:07:23	20,000	WFT3840081	94707VAC4	BD(S)	92.00	COAS	C(B)	95.553	3.86%	\$ 710.60	\$ 238.70
34	41	03/09/2015	16:51:30	03/09/2015	16:51:30	15,000	WFT3840081	94707VAC4	BD(S)	92.645	COAS	C(B)	96.07	3.70%	\$ 513.75	\$ 113.75
35	42	03/27/2015	15:31:14	03/27/2015	15:31:14	28,000	VZ3926361	92343VBG8	C(S)	86.33	COAS	BD(B)	89.638	3.69%	\$ 926.24	\$ 508.62
36a ²	43a	04/08/2015	16:03:06			21,000	TOY3916828	892335AN0	C(S)	84.61	COAS			9.27%	\$ 784.30	\$ 279.67
36b	43b			04/08/2015	16:03:06	20,000	TOY3916828	892335AN0			COAS	C(B)	92.453			
37	44	04/15/2015	15:49:26	04/15/2015	15:49:26	22,000	RIG.HG	893830BB4	C(S)	85.975	COAS	BD(B)	89.928	4.40%	\$ 869.66	\$ 432.43
38	45	04/20/2015	15:39:10	04/20/2015	15:39:10	15,000	TOY3916828	892335AN0	BD(S)	88.954	COAS	C(B)	93.40	5.00%	\$ 666.90	\$ 265.27
39	46	04/21/2015	12:34:28	04/21/2015	12:34:28	29,000	TOY3916828	892335AN0	BD(S)	88.625	COAS	C(B)	93.15	5.11%	\$ 1,312.25	\$ 538.64
40a	47a	04/28/2015	9:29:52			45,000	EAC4123496	29482PAB6	BD(S)	81.40	COAS					
40b	47b			04/28/2015	9:29:52	20,000	EAC4123496	29482PAB6			COAS	C(B)	84.706	4.06%	\$ 661.20	\$ 174.43
41a	48a	04/28/2015	12:04:28			81,000	EAC4123496	29482PAB6	BD(S)	81.40	COAS					
41b	48b			04/28/2015	12:04:28	20,000	EAC4123496	29482PAB6			COAS	C(B)	84.705	4.06%	\$ 660.00	\$ 173.96
41c	48c			04/28/2015	12:04:28	15,000	EAC4123496	29482PAB6			COAS	C(B)	84.705	4.06%	\$ 495.00	\$ 95.00
41d	48d			04/28/2015	12:04:28	16,000	EAC4123496	29482PAB6			COAS	C(B)	84.705	4.06%	\$ 528.00	\$ 128.00
41e	48e			04/28/2015	12:04:28	20,000	EAC4123496	29482PAB6			COAS	C(B)	84.705	4.06%	\$ 660.00	\$ 173.96
42a	49a	04/29/2015	15:27:57			76,000	EAC4123496	29482PAB6	BD(S)	81.40	COAS					
42b	49b			04/29/2015	15:27:57	20,000	EAC4123496	29482PAB6			COAS	C(B)	84.705	4.06%	\$ 661.00	\$ 174.23
42c	49c			04/29/2015	15:27:57	15,000	EAC4123496	29482PAB6			COAS	C(B)	84.705	4.06%	\$ 495.75	\$ 95.75
43a	50a	04/30/2015	14:25:19			20,000	TOY3916828	892335AN0	BD(S)	89.35	COAS					
43b	50b			04/30/2015	14:25:19	15,000	TOY3916828	892335AN0			COAS	C(B)	92.97	4.05%	\$ 543.00	\$ 139.58
44	51	05/11/2015	13:52:25	05/11/2015	13:52:25	15,000	NE3817865	65504LAJ6	BD(S)	92.30	COAS	C(B)	96.70	4.77%	\$ 660.00	\$ 248.81
45a	52a	05/12/2015	14:53:41			50,000	EAC4123496	29482PAB6	BD(S)	78.70	COAS					
45b	52b			05/12/2015	14:53:41	16,000	EAC4123496	29482PAB6			COAS	C(B)	81.865	4.02%	\$ 504.32	\$ 104.32
46a	53a	05/13/2015	15:27:29			32,000	EAC4123496	29482PAB6	BD(S)	78.40	COAS					
46b	53b			05/13/2015	15:27:29	26,000	EAC4123496	29482PAB6			COAS	C(B)	81.762	4.29%	\$ 874.12	\$ 270.75
47	54	05/19/2015	15:30:27	05/19/2015	15:30:27	30,000	EAC4123496	29482PAB6	BD(S)	77.775	COAS	C(B)	81.02	4.17%	\$ 973.50	\$ 282.86
48a	55a	05/19/2015	16:50:59			42,000	EAC4123496	29482PAB6	BD(S)	77.70	COAS					
48b	55b			05/19/2015	16:50:59	25,000	EAC4123496	29482PAB6			COAS	C(B)	81.091	4.36%	\$ 847.75	\$ 272.77
49a	56a	05/21/2015	15:42:08			64,000	EAC4123496	29482PAB6	BD(S)	76.75	COAS					
49b	56b			05/21/2015	15:42:08	30,000	EAC4123496	29482PAB6			COAS	C(B)	79.80	3.97%	\$ 915.00	\$ 233.46
49c	56c			05/21/2015	15:42:08	21,000	EAC4123496	29482PAB6			COAS	C(B)	79.80	3.97%	\$ 640.50	\$ 163.42
50	57	05/26/2015	15:40:29	05/26/2015	15:40:29	14,000	EAC4123496	29482PAB6	BD(S)	76.486	COAS	C(B)	79.80	4.33%	\$ 463.96	\$ 63.96
51a	58a	05/27/2015	14:51:28			41,000	EAC4123496	29482PAB6	BD(S)	76.20	COAS					
51b	58b			05/27/2015	14:51:28	21,000	EAC4123496	29482PAB6			COAS	C(B)	79.335	4.11%	\$ 658.35	\$ 184.69
52	59	05/28/2015	16:34:04	05/28/2015	16:37:21	15,000	JPM4004394	48126DT73	BD(S)	94.15	COAS	C(B)	99.49	5.67%	\$ 801.00	\$ 401.00
53	60	05/28/2015	17:05:02	05/28/2015	17:05:02	14,000	AAPL4208641	037833AZ3	BD(S)	95.452	COAS	C(B)	98.95	3.66%	\$ 489.72	\$ 89.72
54a	61a	06/02/2015	15:52:04			55,000	EAC4123496	29482PAB6	BD(S)	75.70	COAS					
54b	61b			06/02/2015	15:52:04	33,000	EAC4123496	29482PAB6			COAS	C(B)	78.77	4.06%	\$ 1,013.10	\$ 273.66

Coastal Equities Inc. ("COAS")
Matter No. 20150444762
Exhibit A - Fair Pricing Violations

Violation Number	Summary Exhibit #	Trade Date - Purchase	Trade Time - Purchase	Trade Date - Sale	Trade Time - Sale	Volume	Bond	CUSIP	Contra 1	Purchase Price	Firm	Contra 2	Sale Price	Percent Profit	Dollar Profit	Proposed Restitution
55a	62a	06/03/2015	15:49:12			54,000	EAC4123496	29482PAB6	BD(S)	75.40	COAS					
55b	62b			06/03/2015	15:49:12	27,000	EAC4123496	29482PAB6			COAS	C(B)	78.515	4.13%	\$ 841.05	\$ 238.45
56	63	06/08/2015	16:23:10	06/08/2015	16:23:10	28,000	SGMS3950904	80874YAM2	C(S)	75.97	COAS	BD(B)	78.96	3.79%	\$ 837.20	\$ 244.68
57	64	06/09/2015	11:58:36	06/09/2015	11:58:36	25,000	AP03695541	179584AL1	C(S)	43.515	COAS	BD(B)	45.50	4.36%	\$ 496.25	\$ 96.25
58	65	06/09/2015	12:55:34	06/09/2015	12:55:34	20,000	TOY3916828	892335AN0	BD(S)	88.068	COAS	C(B)	91.60	4.01%	\$ 706.40	\$ 177.99
59	66	06/10/2015	16:45:59	06/10/2015	16:45:59	15,000	FTR4161102	35906AAQ1	BD(S)	89.125	COAS	C(B)	92.765	4.08%	\$ 546.00	\$ 144.94
60	67	06/11/2015	11:44:23	06/11/2015	11:44:23	26,000	TOY3916828	892335AN0	BD(S)	88.02	COAS	C(B)	91.68	4.16%	\$ 951.60	\$ 265.04
61	68	06/11/2015	16:24:47	06/11/2015	16:24:47	15,000	EAC4123496	29482PAB6	BD(S)	76.20	COAS	C(B)	79.285	4.05%	\$ 462.75	\$ 62.75
62a	69a	06/12/2015	13:28:03			27,000	FTR4161102	35906AAQ1	BD(S)	88.643	COAS					
62b	69b			06/12/2015	13:28:03	12,000	FTR4161102	35906AAQ1			COAS	C(B)	92.585	4.45%	\$ 473.04	\$ 73.04
63	70	06/25/2015	12:46:45	06/25/2015	12:46:45	20,000	EAC4123496	29482PAB6	BD(S)	75.90	COAS	C(B)	79.024	4.12%	\$ 624.80	\$ 175.47
64	71	06/25/2015	12:51:38	06/25/2015	12:51:38	15,000	FTR4161102	35906AAQ1	BD(S)	86.625	COAS	C(B)	90.375	4.33%	\$ 562.50	\$ 162.50
65a	72a	07/07/2015	13:27:34			51,000	FTR4161102	35906AAQ1	BD(S)	84.287	COAS					
65b	72b			07/07/2015	13:27:34	15,000	FTR4161102	35906AAQ1			COAS	C(B)	87.805	4.17%	\$ 527.70	\$ 127.70
65c	72c			07/07/2015	13:27:34	16,000	FTR4161102	35906AAQ1			COAS	C(B)	87.805	4.17%	\$ 562.88	\$ 158.30
65d	72d			07/07/2015	13:27:34	15,000	FTR4161102	35906AAQ1			COAS	C(B)	87.805	4.17%	\$ 527.70	\$ 127.70
66	73	07/09/2015	14:09:42	07/09/2015	14:09:42	10,000	NE3817865	65504LAJ6	BD(S)	92.094	COAS	C(B)	96.70	5.00%	\$ 460.60	\$ 60.60
67	74	07/10/2015	15:51:16	07/10/2015	15:51:16	36,000	RIG.HG	893830BB4	C(S)	84.13	COAS	BD(B)	87.535	3.89%	\$ 1,225.80	\$ 346.60
68a	75a	07/13/2015	16:27:56			32,000	FTR4161102	35906AAQ1	BD(S)	85.50	COAS					
68b	75b			07/13/2015	16:27:56	16,000	FTR4161102	35906AAQ1			COAS	C(B)	88.84	3.91%	\$ 534.40	\$ 134.40
69	76	07/14/2015	16:55:32	07/14/2015	16:55:32	20,000	FTR4161102	35906AAQ1	BD(S)	85.75	COAS	C(B)	88.84	3.60%	\$ 618.00	\$ 175.53
70	77	07/15/2015	15:06:25	07/15/2015	15:06:25	26,000	FTR4161102	35906AAQ1	BD(S)	85.75	COAS	C(B)	89.095	3.90%	\$ 869.70	\$ 294.49
71	78	07/17/2015	09:58:16	07/17/2015	09:58:16	21,000	FTR4161102	35906AAQ1	BD(S)	86.75	COAS	C(B)	90.00	3.75%	\$ 682.50	\$ 212.49
72	79	07/17/2015	11:13:47	07/17/2015	11:13:47	50,000	WFT.GW	94707VAA8	C(S)	96.88	COAS	BD(B)	100.025	3.14%	\$ 1,572.50	\$ 702.28
73a	80a	07/20/2015	16:11:54			46,000	FTR4161102	35906AAQ1	BD(S)	86.50	COAS					
73b	80b			07/20/2015	16:11:54	25,000	FTR4161102	35906AAQ1			COAS	C(B)	89.87	3.90%	\$ 842.50	\$ 284.58
74a	81a	07/21/2015	16:02:20			76,000	FTR4161102	35906AAQ1	BD(S)	85.75	COAS					
74b	81b			07/21/2015	16:02:20	50,000	FTR4161102	35906AAQ1			COAS	C(B)	89.10	3.91%	\$ 1,675.00	\$ 568.82
74c	81c			07/21/2015	16:02:20	26,000	FTR4161102	35906AAQ1			COAS	C(B)	89.10	3.91%	\$ 871.00	\$ 295.79
75	82	07/22/2015	16:36:03	07/22/2015	16:36:03	20,000	TOY3916828	892335AN0	BD(S)	84.00	COAS	C(B)	87.805	4.53%	\$ 761.00	\$ 260.36
76a	83a	07/23/2015	13:45:37			83,000	FTR4161102	35906AAQ1	BD(S)	83.50	COAS					
76b	83b			07/23/2015	13:45:37	20,000	FTR4161102	35906AAQ1			COAS	C(B)	87.03	4.22%	\$ 706.00	\$ 215.82
76c	83c			07/23/2015	13:45:37	32,000	FTR4161102	35906AAQ1			COAS	C(B)	87.03	4.22%	\$ 1,129.60	\$ 345.30
76d	83d			07/23/2015	13:45:37	26,000	FTR4161102	35906AAQ1			COAS	C(B)	87.03	4.22%	\$ 917.80	\$ 280.56
77	84	07/29/2015	16:27:02	07/29/2015	16:27:02	22,000	FTR4161102	35906AAQ1	BD(S)	83.62	COAS	C(B)	86.775	3.77%	\$ 694.10	\$ 219.47
78a	85a			07/30/2015	10:55:52	40,000	AMD4155878	007903BC0			COAS	BD(B)	65.035			
78b	85b	07/30/2015	10:54:00			25,000	AMD4155878	007903BC0	C(S)	62.51	COAS			3.88%	\$ 631.25	\$ 231.25
79a	86a	07/30/2015	11:21:44			40,000	SGY3921538	861642AM8	C(S)	76.23	COAS			3.51%	\$ 1,108.00	\$ 687.72
79b	86b			07/30/2015	10:58:00	25,000	SGY3921538	861642AM8			COAS	BD(B)	79.00			
80a	87a	07/30/2015	14:01:34			35,000	TOY3916828	892335AN0	BD(S)	81.00	COAS					
80b	87b			07/30/2015	14:01:34	15,000	TOY3916828	892335AN0			COAS	C(B)	84.71	4.58%	\$ 556.50	\$ 156.50
81	88	07/31/2015	15:52:46	07/31/2015	15:52:46	25,000	FTR4161102	35906AAQ1	BD(S)	85.875	COAS	C(B)	89.10	3.76%	\$ 806.25	\$ 252.36
82	89	08/07/2015	10:50:00	08/07/2015	10:53:21	15,000	RIG.HE	893830AY5	C(S)	81.71	COAS	BD(B)	84.867	3.72%	\$ 473.55	\$ 73.55

Coastal Equities Inc. ("COAS")
Matter No. 20150444762
Exhibit A - Fair Pricing Violations

Violation Number	Summary Exhibit #	Trade Date - Purchase	Trade Time - Purchase	Trade Date - Sale	Trade Time - Sale	Volume	Bond	CUSIP	Contra 1	Purchase Price	Firm	Contra 2	Sale Price	Percent Profit	Dollar Profit	Proposed Restitution
83	90	08/12/2015	15:53:30	08/12/2015	15:53:30	86,000	TOY3916828	892335AN0	BD(S)	78.075	COAS	C(B)	80.99	3.73%	\$ 2,506.90	\$ 1,681.02
84	91	08/14/2015	10:08:29	08/14/2015	10:08:29	15,000	FTR4161102	35906AAQ1	BD(S)	85.833	COAS	C(B)	88.97	3.65%	\$ 470.55	\$ 70.55
85	92	08/25/2015	11:44:05	08/25/2015	11:44:05	25,000	VIA3980968	92553PAR3	BD(S)	89.73	COAS	C(B)	92.97	3.61%	\$ 810.00	\$ 291.80
86	93	08/26/2015	11:14:00	08/26/2015	11:19:38	25,000	VZ3926361	92343VBG8	C(S)	77.99	COAS	BD(B)	81.401	4.19%	\$ 852.75	\$ 431.50
87a	94a	08/27/2015	16:39:04			21,000	PSEC4233830	74348TAQ5	BD(S)	92.125	COAS					
87b	94b			08/27/2015	16:39:04	14,000	PSEC4233830	74348TAQ5			COAS	C(B)	96.07	4.28%	\$ 552.30	\$ 152.30
88	95	08/27/2015	16:39:38	08/27/2015	16:39:38	27,000	EAC4123496	29482PAB6	BD(S)	72.50	COAS	C(B)	75.415	4.02%	\$ 787.05	\$ 201.76
89	96	09/08/2015	11:08:07	09/08/2015	11:08:07	30,000	VIA3980968	92553PAR3	BD(S)	91.94	COAS	C(B)	95.49	3.86%	\$ 1,065.00	\$ 427.85
90	97	09/08/2015	11:20:39	09/08/2015	11:20:39	23,000	EAC4123496	29482PAB6	BD(S)	71.75	COAS	C(B)	74.635	4.02%	\$ 663.55	\$ 170.12
91	98	09/08/2015	11:29:45	09/08/2015	11:29:45	25,000	FTR4161102	35906AAQ1	BD(S)	85.50	COAS	C(B)	88.84	3.91%	\$ 835.00	\$ 238.63
92	99	09/15/2015	10:17:57	09/15/2015	10:17:57	23,000	KGC4204105	496902AN7	BD(S)	84.23	COAS	C(B)	87.716	4.14%	\$ 801.78	\$ 401.78
93a	100a	09/21/2015	15:51:48			25,000	TROX4051583	897050AB6	BD(S)	74.38	COAS					
93b	100b			09/21/2015	16:08:00	21,000	TROX4051583	897050AB6			COAS	C(B)	78.515	5.56%	\$ 868.35	\$ 406.00
94a	101a	09/23/2015	14:07:31			47,000	TROX4051583	897050AB6	BD(S)	71.125	COAS					
94b	101b			09/23/2015	14:07:31	18,000	TROX4051583	897050AB6			COAS	C(B)	73.99	4.03%	\$ 515.70	\$ 115.70
94c	101c			09/23/2015	14:07:31	29,000	TROX4051583	897050AB6			COAS	C(B)	73.99	4.03%	\$ 830.85	\$ 220.31
95	102	09/25/2015	16:05:47	09/25/2015	16:05:47	28,000	TROX4051583	897050AB6	BD(S)	68.95	COAS	C(B)	71.795	4.13%	\$ 796.60	\$ 225.15
96a	103a	09/29/2015	16:00:02			31,000	TROX4051583	897050AB6	BD(S)	65.00	COAS					
96b	103b			09/29/2015	16:00:02	19,000	TROX4051583	897050AB6			COAS	C(B)	67.67	4.11%	\$ 507.30	\$ 107.30
97a	104a			09/30/2015	16:49:30	78,000	TOY3916828	892335AN0			COAS	C(B)	82.435	4.06%	\$ 2,506.30	\$ 652.53
97b	104b	09/30/2015	16:49:30			74,000	TOY3916828	892335AN0	BD(S)	79.50	COAS					
98a	105a	10/01/2015	16:28:51			37,000	TROX4051583	897050AB6	BD(S)	61.00	COAS					
98b	105b			10/01/2015	16:28:51	26,000	TROX4051583	897050AB6			COAS	C(B)	63.275	3.73%	\$ 591.50	\$ 164.87
99a	106a	10/06/2015	16:23:46			59,000	KGC4204105	496902AN7	BD(S)	80.75	COAS					
99b	106b			10/06/2015	16:23:46	16,000	KGC4204105	496902AN7			COAS	C(B)	83.94	3.95%	\$ 510.40	\$ 110.40
99c	106c			10/06/2015	16:23:46	16,000	KGC4204105	496902AN7			COAS	C(B)	83.94	3.95%	\$ 510.40	\$ 110.40
99d	106d			10/06/2015	16:23:46	21,000	KGC4204105	496902AN7			COAS	C(B)	83.94	3.95%	\$ 669.90	\$ 176.44
100a	107a	10/09/2015	14:48:49			61,000	TROX4051583	897050AB6	BD(S)	73.50	COAS					
100b	107b			10/09/2015	14:48:49	45,000	TROX4051583	897050AB6			COAS	C(B)	76.24	3.73%	\$ 1,233.00	\$ 343.28
101	108	10/15/2015	13:51:08	10/15/2015	13:51:08	17,000	TROX4051583	897050AB6	BD(S)	74.368	COAS	C(B)	77.215	3.83%	\$ 483.99	\$ 83.99
102	109	10/19/2015	16:33:00	10/19/2015	16:33:00	15,000	EAC4123496	29482PAB6	C(S)	67.69	COAS	BD(B)	70.867	4.48%	\$ 476.55	\$ 76.55
103	110	10/30/2015	12:37:37	10/30/2015	12:37:37	16,000	KGC4204105	496902AN7	BD(S)	82.904	COAS	C(B)	86.293	4.09%	\$ 542.24	\$ 142.24
104	111	11/06/2015	11:42:42	11/06/2015	11:42:42	15,000	KTOS4166141	50077BAL2	BD(S)	78.133	COAS	C(B)	81.50	4.31%	\$ 505.05	\$ 105.05
105a	112a	11/12/2015	15:18:34			22,000	KTOS4166141	50077BAL2	BD(S)	73.75	COAS					
105b	112b			11/12/2015	15:18:34	17,000	KTOS4166141	50077BAL2			COAS	C(B)	76.70	4.00%	\$ 501.50	\$ 101.50
106	113	11/13/2015	15:56:30	11/13/2015	15:56:30	24,000	KTOS4166141	50077BAL2	BD(S)	66.75	COAS	C(B)	69.47	4.07%	\$ 652.80	\$ 252.80
107	114	11/13/2015	16:02:49	11/13/2015	16:02:49	26,000	KGC4204105	496902AN7	BD(S)	80.926	COAS	C(B)	84.93	4.95%	\$ 1,041.04	\$ 451.90
108	115	11/16/2015	16:21:32	11/16/2015	16:21:32	18,000	KTOS4166141	50077BAL2	BD(S)	69.081	COAS	C(B)	71.59	3.63%	\$ 451.62	\$ 51.62
109	116	11/17/2015	16:40:00	11/17/2015	16:41:56	30,000	WFT.GW	94707VAA8	C(S)	83.03	COAS	BD(B)	86.30	3.79%	\$ 981.00	\$ 581.00
110a	117a	11/17/2015	16:42:53			166,000	KTOS4166141	50077BAL2	BD(S)	70.035	COAS					
110b	117b			11/17/2015	16:42:53	57,000	KTOS4166141	50077BAL2			COAS	C(B)	72.58	3.63%	\$ 1,450.65	\$ 576.40
110c	117c			11/17/2015	16:42:53	57,000	KTOS4166141	50077BAL2			COAS	C(B)	72.58	3.63%	\$ 1,450.65	\$ 576.40
110d	117d			11/17/2015	16:42:53	35,000	KTOS4166141	50077BAL2			COAS	C(B)	72.58	3.63%	\$ 890.75	\$ 353.93

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Violation Number	Summary Exhibit #	Trade Date - Purchase	Trade Time - Purchase	Trade Date - Sale	Trade Time - Sale	Volume	Bond	CUSIP	Contra 1	Purchase Price	Firm	Contra 2	Sale Price	Percent Profit	Dollar Profit	Proposed Restitution
111a	118a	11/18/2015	16:30:37			49,000	KTOS4166141	50077BAL2	BD(S)	71.00	COAS					
111b	118b			11/18/2015	16:30:37	33,000	KTOS4166141	50077BAL2			COAS	C(B)	73.605	3.67%	\$ 859.65	\$ 346.53
112a	119a	11/19/2015	15:39:00			106,000	KTOS4166141	50077BAL2	BD(S)	69.625	COAS					
112b	119b			11/19/2015	15:39:00	57,000	KTOS4166141	50077BAL2			COAS	C(B)	72.31	3.86%	\$ 1,530.45	\$ 661.32
112c	119c			11/19/2015	15:39:00	33,000	KTOS4166141	50077BAL2			COAS	C(B)	72.31	3.86%	\$ 886.05	\$ 382.87
113a	120a	11/20/2015	15:33:23			41,000	KGC4204105	496902AN7	BD(S)	80.51	COAS					
113b	120b			11/20/2015	15:33:23	26,000	KGC4204105	496902AN7			COAS	C(B)	83.675	3.93%	\$ 822.90	\$ 364.48
113c	120c			11/20/2015	15:33:23	15,000	KGC4204105	496902AN7			COAS	C(B)	83.675	3.93%	\$ 474.75	\$ 74.75
114a	121a	11/20/2015	15:23:34			121,000	KTOS4166141	50077BAL2	BD(S)	69.75	COAS					
114b	121b			11/20/2015	15:23:34	23,000	KTOS4166141	50077BAL2			COAS	C(B)	72.315	3.68%	\$ 589.95	\$ 140.76
114c	121c			11/20/2015	15:23:34	33,000	KTOS4166141	50077BAL2			COAS	C(B)	72.315	3.68%	\$ 846.45	\$ 201.96
115a	122a	11/23/2015	14:33:19			84,000	KTOS4166141	50077BAL2	BD(S)	68.625	COAS					
115b	122b			11/23/2015	14:33:19	17,000	KTOS4166141	50077BAL2			COAS	C(B)	71.28	3.87%	\$ 451.35	\$ 51.35
115c	122c			11/23/2015	14:33:19	29,000	KTOS4166141	50077BAL2			COAS	C(B)	71.28	3.87%	\$ 769.95	\$ 334.11
115d	122d			11/23/2015	14:33:19	22,000	KTOS4166141	50077BAL2			COAS	C(B)	71.28	3.87%	\$ 584.10	\$ 184.10
116a	123a	11/25/2015	13:33:35			102,000	KTOS4166141	50077BAL2	BD(S)	68.00	COAS					
116b	123b			11/25/2015	13:33:35	35,000	KTOS4166141	50077BAL2			COAS	C(B)	70.64	3.88%	\$ 924.00	\$ 402.78
116c	123c			11/25/2015	13:33:35	42,000	KTOS4166141	50077BAL2			COAS	C(B)	70.64	3.88%	\$ 1,108.80	\$ 483.34
117a	124a	12/16/2015	15:59:24			57,000	KTOS4166141	50077BAL2	BD(S)	70.00	COAS					
117b	124b			12/16/2015	15:59:24	27,000	KTOS4166141	50077BAL2			COAS	C(B)	72.31	3.30%	\$ 623.70	\$ 223.70
118a	125a	12/17/2015	15:56:14			62,000	KTOS4166141	50077BAL2	BD(S)	69.00	COAS					
118b	125b			12/17/2015	15:56:14	37,000	KTOS4166141	50077BAL2			COAS	C(B)	71.795	4.05%	\$ 1,034.15	\$ 634.15
119a	126a	12/18/2015	16:10:02			47,000	KTOS4166141	50077BAL2	BD(S)	69.075	COAS					
119b	126b			12/18/2015	14:10:02	22,000	KTOS4166141	50077BAL2			COAS	C(B)	71.795	3.94%	\$ 598.40	\$ 198.40
119c	126c			12/18/2015	16:10:02	20,000	KTOS4166141	50077BAL2			COAS	C(B)	71.795	3.94%	\$ 544.00	\$ 144.00
120	127	12/18/2015	16:21:00	12/18/2015	16:21:33	14,000	AAPL4208641	037833AZ3	C(S)	92.345	COAS	BD(B)	95.70	3.51%	\$ 469.70	\$ 69.70
121a	128a	12/31/2015	10:12:52			72,000	KTOS4166141	50077BAL2	BD(S)	72.00	COAS					
121b	128b			12/31/2015	10:12:52	50,000	KTOS4166141	50077BAL2			COAS	C(B)	74.765	3.84%	\$ 1,382.50	\$ 756.10
121c	128c			12/31/2015	10:12:52	22,000	KTOS4166141	50077BAL2			COAS	C(B)	74.765	3.84%	\$ 608.30	\$ 208.30
Total																\$ 40,369.58

1 - The customer who sold to COAS was determined to be disadvantaged by the trade.

2 - The customer markdown was determined to be a violation, but the markup had comparable trades identified.

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8210 Item #	Trade Date - Purchase	Trade Time - Purchase	Trade Date - Sale	Trade Time - Sale	CUSIP	Bought From	Firm	Sold To	Volume	Purchase Price	Sale Price	Percent Profit	Proposed Restitution
1	04/13/2016	15:59:00	04/13/2016	15:59:50	496902AN7	C	COAS	SMRD	11,000	87.03	91.25	4.62%	\$ 64.20
2	04/20/2016	15:36:00	04/20/2016	15:42:15	893830BB4	C	COAS	INGRS	50,000	79.55	83.00	4.16%	\$ 425.41
35a			04/20/2016	15:44:56	892335AN0		COAS	SMRD	172,000		91.50		
35b	04/20/2016	15:49:35			892335AN0	C	COAS		78,000	88.24		3.56%	\$ 1,567.88
35c	04/20/2016	15:53:48			892335AN0	C	COAS		23,000	88.24		3.56%	\$ 349.80
36a			04/21/2016	12:13:08	892335AN0		COAS	SMRD	51,000		91.50		
36b	04/21/2016	12:05:00			892335AN0	C	COAS		20,000	88.24		3.56%	\$ 252.00
36c	04/21/2016	12:05:00			892335AN0	C	COAS		21,000	88.24		3.56%	\$ 284.60
3	04/21/2016	16:00:00	04/21/2016	16:01:46	892335AN0	C	COAS	SMRD	20,000	88.24	91.625	3.69%	\$ 277.00
4	04/26/2016	15:48:00	04/26/2016	15:59:39	897050AB6	C	COAS	INGRS	25,000	80.62	83.50	3.45%	\$ 320.00
5	04/26/2016	15:56:40	04/26/2016	15:56:40	80874YAM2	INGRS	COAS	C	30,000	64.50	66.89	3.71%	\$ 317.00
37a	04/29/2016	11:54:25			690070AC1	MACC	COAS		20,000	81.73			
37b			04/29/2016	11:54:25	690070AC1		COAS	C	15,000		85.167	4.21%	\$ 115.55
38a			05/02/2016	16:07:46	897050AB6		COAS	INGRS	33,000		83.875		
38b	05/02/2016	16:01:53			897050AB6	C	COAS		21,000	80.745		3.73%	\$ 257.30
6	05/04/2016	15:57:46	05/04/2016	15:57:46	80874YAM2	INGRS	COAS	C	20,000	66.00	68.435	3.69%	\$ 87.00
7	05/05/2016	09:20:00	05/05/2016	09:21:57	897050AB6	C	COAS	INGRS	29,000	78.33	81.00	3.30%	\$ 374.30
8	05/05/2016	12:00:00	05/05/2016	12:02:40	897050AB6	C	COAS	INGRS	18,000	78.815	82.375	4.32%	\$ 240.80
9	05/09/2016	16:03:35	05/09/2016	16:03:35	690070AC1	SMRD	COAS	C	29,000	84.25	87.288	3.61%	\$ 438.13
10	05/10/2016	13:34:10	05/10/2016	13:43:12	897050AB6	C	COAS	INGRS	32,000	73.01	75.625	3.46%	\$ 436.80
39a			06/15/2016	15:42:56	897050AB6		COAS	MACC	49,000		74.496		
39b	06/15/2016	15:51:56			897050AB6	C	COAS		30,000	71.895		3.49%	\$ 369.48
40a			06/15/2016	16:13:36	496902AN7		COAS	INGRS	49,000		97.375		
40b	06/15/2016	16:12:49			496902AN7	C	COAS		20,000	94.30		3.16%	\$ 215.00
40c	06/15/2016	16:13:25			496902AN7	C	COAS		15,000	94.30		3.16%	\$ 61.25
12	06/20/2016	16:44:23	06/20/2016	16:38:58	897050AB6	C	COAS	INGRS	19,000	70.65	73.25	3.55%	\$ 94.00
13	06/21/2016	14:51:50	06/21/2016	14:53:42	893830AK5	C	COAS	INGRS	35,000	97.65	101.00	3.32%	\$ 433.40
14	06/21/2016	15:15:13	06/21/2016	15:21:25	496902AN7	C	COAS	INGRS	15,000	94.525	98.00	3.55%	\$ 121.25
41a			06/21/2016	15:21:37	37247DAK2		COAS	SMRD	123,000		98.75		
41b	06/21/2016	15:16:01			37247DAK2	C	COAS		102,000	95.395		3.40%	\$ 1,033.00
41c	06/21/2016	15:16:36			37247DAK2	C	COAS		21,000	95.395		3.40%	\$ 212.67
15	06/21/2016	16:40:43	06/21/2016	16:43:29	496902AN7	C	COAS	INGRS	52,000	94.525	97.75	3.30%	\$ 635.49

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8210 Item #	Trade Date - Purchase	Trade Time - Purchase	Trade Date - Sale	Trade Time - Sale	CUSIP	Bought From	Firm	Sold To	Volume	Purchase Price	Sale Price	Percent Profit	Proposed Restitution
16	06/22/2016	11:27:42	06/22/2016	11:27:16	37247DAP1	C	COAS	SMRD	20,000	82.325	85.50	3.71%	\$ 216.69
17	06/23/2016	14:03:29	06/23/2016	14:00:07	35906AAP3	C	COAS	SMRD	20,000	91.70	95.125	3.60%	\$ 285.00
18	07/14/2016	16:04:05	07/14/2016	16:06:18	35906AAQ1	C	COAS	MACC	15,000	84.13	87.379	3.72%	\$ 87.35
42a			07/18/2016	16:21:04	37247DAK2		COAS	SMRD	23,000		99.00		
42b	07/18/2016	16:20:26			37247DAK2	C	COAS		17,000	95.62		3.42%	\$ 175.45
19	07/19/2016	09:12:53	07/19/2016	09:18:59	897050AB6	C	COAS	INGRS	21,000	75.523	78.25	3.48%	\$ 172.67
20	07/19/2016	15:34:57	07/19/2016	15:34:37	403777AB1	C	COAS	INGRS	42,000	62.52	64.75	3.44%	\$ 395.70
21	07/19/2016	15:37:14	07/19/2016	15:41:43	37247DAK2	C	COAS	SMRD	16,000	95.73	99.25	3.55%	\$ 163.20
22	08/10/2016	12:06:42	08/10/2016	12:05:32	257867BB6	C	COAS	MACC	30,000	93.326	96.71	3.50%	\$ 312.73
43a			08/12/2016	15:48:12	897050AB6		COAS	INGRS	84,000		88.25		
43b	08/12/2016	15:38:23			897050AB6	C	COAS		45,000	85.22		3.44%	\$ 499.73
43c	08/12/2016	15:39:06			897050AB6	C	COAS		16,000	85.22		3.44%	\$ 85.60
44a			08/15/2016	16:24:24	897050AB6		COAS	INGRS	79,000		89.25		
44b	08/15/2016	16:24:09			897050AB6	C	COAS		16,000	86.16		3.46%	\$ 94.40
44c	08/15/2016	16:26:08			897050AB6	C	COAS		17,000	86.16		3.46%	\$ 125.30
44d	08/15/2016	16:28:23			897050AB6	C	COAS		16,000	86.16		3.46%	\$ 94.40
23	08/15/2016	16:49:47	08/15/2016	16:47:22	897050AB6	C	COAS	INGRS	20,000	86.16	89.25	3.46%	\$ 218.00
45a			08/16/2016	16:15:12	897050AB6		COAS	INGRS	65,000		89.25		
45b	08/16/2016	16:00:59			897050AB6	C	COAS		16,000	86.16		3.46%	\$ 94.40
45c	08/16/2016	16:03:09			897050AB6	C	COAS		25,000	86.16		3.46%	\$ 285.93
24	08/17/2016	16:16:37	08/17/2016	16:19:45	897050AB6	C	COAS	INGRS	22,000	86.165	89.25	3.46%	\$ 250.51
25	08/23/2016	15:05:21	08/23/2016	15:07:14	897050AB6	C	COAS	MACC	21,000	86.16	89.386	3.61%	\$ 268.11
26	08/30/2016	15:47:25	08/30/2016	15:52:43	37247DAK2	C	COAS	SMRD	38,000	98.24	101.875	3.57%	\$ 615.99
27	09/07/2016	15:55:35	09/07/2016	15:56:49	897050AB6	C	COAS	INGRS	63,000	87.03	90.125	3.43%	\$ 728.82
46a			09/08/2016	16:36:02	897050AB6		COAS	INGRS	58,000		90.50		
46b	09/08/2016	16:30:01			897050AB6	C	COAS		18,000	87.42		3.40%	\$ 154.40
46c	09/08/2016	16:31:15			897050AB6	C	COAS		18,000	87.42		3.40%	\$ 154.40
46d	09/08/2016	16:31:55			897050AB6	C	COAS		16,000	87.42		3.40%	\$ 92.80
28	09/09/2016	13:15:43	09/09/2016	13:54:51	29482PAB6	C	COAS	MACC	40,000	44.725	46.475	3.77%	\$ 274.38
47a			09/09/2016	14:31:57	897050AB6		COAS	INGRS	48,000		89.10		
47b	09/09/2016	14:30:26			897050AB6	C	COAS		20,000	86.06		3.41%	\$ 207.40
47c	09/09/2016	14:31:16			897050AB6	C	COAS		28,000	86.06		3.41%	\$ 313.85

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