

**FINANCIAL INDUSTRY REGULATORY AUTHORITY**

**OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

Bruce Martin Zipper  
(CRD No. 1019731),

and

Dakota Securities International, Inc.  
(CRD No. 132700),

Respondents.

DISCIPLINARY PROCEEDING  
No. 2016047565702

**COMPLAINT**

The Department of Enforcement alleges:

**SUMMARY**

1. From May 31, 2016 through August 30, 2016, while statutorily disqualified and suspended in all capacities, Bruce Martin Zipper conducted a securities business, engaged in clerical and managerial activities on behalf of Dakota Securities International, Inc. ("Dakota"), and continued to associate with Dakota in violation of a suspension order he had entered into with FINRA. As a result, Zipper violated NASD Membership and Registration Rule 1031 and FINRA Rule 2010, and acted in contravention of Article III, Section 3(b) of FINRA's By-Laws.

2. During the Suspension Period,<sup>1</sup> Dakota permitted Zipper to associate with the firm and engage in a securities business and clerical and managerial activities on behalf of the firm in violation of the FINRA suspension order. As a result, Dakota violated NASD Membership and Registration Rule 1031, FINRA Rules 8311 and 2010, and acted in contravention of Article III, Section 3(b) of FINRA's By-Laws.
3. During the Suspension Period, Dakota failed to establish and maintain a supervisory system reasonably designed to ensure regular review of electronic correspondence and that individuals subject to a suspension were not acting in a capacity that required registration or otherwise acting in contravention of the suspension. As a result, Dakota violated FINRA Rules 3110 and 2010.
4. Further, from February 22, 2016 through November 16, 2016, Zipper and another associated person of Dakota caused the falsification of Dakota's books and records by misidentifying the broker of record for hundreds of trades. As a result, Zipper caused Dakota to maintain inaccurate books and records in violation of FINRA Rules 4511 and 2010, and Dakota maintained inaccurate books and records in violation of FINRA Rules 4511 and 2010, and Section 17(a) of the Securities and Exchange Act of 1934 ("Exchange Act") and Rule 17a-3 thereunder.

## **RESPONDENTS AND JURISDICTION**

5. Dakota is a broker-dealer located in Miami, Florida that is primarily involved in brokerage activities selling equities, options, and corporate debt to retail customers.

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<sup>1</sup> The "Suspension Period" refers to the time period of May 31, 2016 through August 30, 2016, when Zipper was suspended in all capacities pursuant to a Letter of Acceptance, Waiver, and Consent entered into with FINRA on April 22, 2016 (hereinafter, the "AWC"). Due to the nature of the agreed willful violation in the AWC, and during the Suspension Period due to Zipper's suspension from associating with a FINRA member, Zipper was subject to a statutory disqualification from association with any FINRA member (pursuant to Article III, Section 4(a) of FINRA's Bylaws of the Corporation).

Dakota has been a FINRA member since February 10, 2005. Dakota currently has approximately seven registered individuals and one branch location.

6. Zipper entered the securities industry in 1981. Zipper has been associated with several FINRA member firms. Most recently, from February 2005 through October 2017, Zipper was registered with Dakota as a General Securities Principal, General Securities Representative, and Registered Options Principal. Zipper was Dakota's founder and served at various times as Dakota's President, Chief Executive Officer ("CEO"), Chief Compliance Officer ("CCO"), and Financial and Operations Principal ("FINOP").
7. Zipper is not currently registered with FINRA; however he remains subject to FINRA's jurisdiction for purposes of this proceeding, pursuant to Article V, Section 4 of FINRA's By-Laws, because: (i) the Complaint was filed within two years after the effective date of revocation of Zipper's registrations with FINRA, namely, October 2, 2017; and (ii) the Complaint charges Zipper with misconduct committed while he was registered or associated with a FINRA member firm.
8. Dakota is, and at all relevant times to the Complaint was, a FINRA member firm. Dakota is subject to FINRA's jurisdiction pursuant to FINRA By-Laws Article IV, Section 1.

## **STATEMENT OF FACTS**

- I. **Zipper Entered Into An AWC With FINRA Resulting In An All Capacities Suspension From Association With Any Member Firm**

9. On April 1, 2016, Zipper entered into an AWC that was accepted by FINRA on April 22, 2016. A true and accurate copy of the AWC is attached and incorporated herein as **Exhibit 1**.
10. Pursuant to the AWC, Zipper acknowledged, without admitting or denying FINRA's findings of fact, that he willfully failed to timely amend his Form U4 to disclose unsatisfied judgments against him in contravention of Article V, Section 2(c) of FINRA's By-Laws and in violation of FINRA Rules 1122 and 2010.
11. Pursuant to the AWC, Zipper consented to a three month suspension from association with any FINRA member in all capacities and a reduced \$5,000 fine.
12. The AWC further provided:
- I understand that if I am barred or suspended from associating with any FINRA member, I become subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, I may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension (see FINRA Rules 8310 and 8311).
- I understand that this settlement includes a finding that I willfully omitted to state a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of FINRA's By-Laws, this omission makes me subject to a statutory disqualification with respect to association with a member.
- The sanctions imposed herein shall be effective on a date set by FINRA staff.
13. At the time Zipper entered into the AWC, he was Dakota's President, CEO, CCO, General Securities Principal, and FINOP.
14. Following acceptance of the AWC, FINRA staff advised Zipper, in writing, that his three month all capacities suspension would begin on May 16, 2016.

15. On April 26, 2016, Zipper submitted a written request to FINRA staff requesting an extension of the date on which the suspension would begin, stating:

I am at Dakota basically a one man business. I wear the hats of the CEO, FinOP, Compliance officer, and President of the firm. It is now up to me to replace myself with other personal (sic) to fill these positions. To accomplish this by May 16 would impose an unfair hardship to myself, my firm, and most importantly my clients. It is for these reasons that I am ask FINRA for an extension till (sic) Monday June 13, 2016 to begin my suspension and end on September 15, 2016.

16. On April 27, 2016, Zipper was notified by FINRA staff, in writing, that he would be provided a one-time two-week extension of time before the commencement of his suspension, which would begin May 31, 2016.
17. On April 27, 2016, FINRA staff sent a letter to Zipper providing in part: “This is to advise that the suspension in all capacities will be in effect from **May 31, 2016 through August 30, 2016**. We would like to bring your attention to Rule 8311 of the FINRA Manual, entitled ‘Effect of a Suspension, Revocation, Cancellation or Bar.’”
18. During the Suspension Period, Dakota’s Written Supervisory Procedures (“WSPs”) provided that while under suspension, “employees may not: Have direct or indirect contact with customers” or “Give investment advice or counsel.”

**II. Zipper Violated The AWC By Engaging In Activities Requiring Registration And Continuing to Associate With Dakota During His Suspension**

19. During the Suspension Period, RL was named Dakota’s acting President, CEO, and CCO. RL had no previous supervisory experience.
20. During the Suspension Period, Zipper engaged in activities requiring association and registration with a FINRA member firm. Specifically, Zipper e-mailed Dakota customers soliciting the sale of securities from his Dakota e-mail address;

communicated with customers regarding securities and account holdings; provided account statements to customers; and engaged in clerical and managerial functions on behalf of Dakota, including e-mailing with firm vendors.

21. During the Suspension Period, Dakota did not restrict Zipper's access to its e-mail or trading systems in any way.
22. Further, during the Suspension Period, Dakota did not conduct any reviews of the firm's electronic correspondence.
23. Additionally, during the Suspension Period, Dakota's operations continued out of Zipper's residence, the firm's principal place of business.
24. On May 31, 2016, the first day of the Suspension Period, Zipper immediately began violating the AWC and Dakota's WSPs by engaging in clerical and managerial activities on behalf of Dakota and by communicating with Dakota customers regarding securities business.
25. Specifically, on May 31, 2016, Zipper e-mailed with Dakota's e-mail archiving vendor regarding an outstanding Dakota invoice and informed the vendor "check going out today." This email—like almost all the e-mails sent by Zipper from his Dakota e-mail address during the Suspension Period—contained a signature block designating Zipper as President of Dakota Securities.<sup>2</sup>
26. On May 31, 2016, Zipper e-mailed RD at Dakota's clearing firm, CCL, from Zipper's personal gmail e-mail account, stating in part:

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<sup>2</sup> Unless otherwise noted, Zipper's e-mails referenced herein were sent from his Dakota e-mail address: [REDACTED].

Hi [RD], got your voicemail and will get back to you tomorrow. Having some medical issues with the family and am not in the office today. I know you are asking about the net cap excess to 25K for Dakota. The number for April rose to 18K and by May will show 25K or more. We did bring on to Dakota that broker you interviewed, [DA], he seems like a nice guy and good fit for the company. Listen [RD] we are slowly coming out of a bad tailspin and I appreciate all that you and [CCL] have done for me. I give you my word that the May numbers will be there. Thanks again, speak tomorrow, Bruce

27. On May 31, 2016, Zipper sent another e-mail to CCL from his personal gmail e-mail account, stating in part: "I see I got charged the 500 dollar penalty for the WDDD trade. Did they review my request for either a waiver or reduction due to financial ability? let me know, thx, Bruce".

28. On May 31, 2016, Zipper e-mailed CF, a Dakota shareholder and indirect lender, from Zipper's personal gmail e-mail account and stated:

Hi [CF], I am using my personal e-mail for privacy reasons. I got a call from [RM] today on my voice mail. He said [CCL] saw we are under the 25K minimum net cap excess and wants to talk to me. I know he is going to be upset and give me an ultimatum. I didn't want to speak to him and give any assurances about this until I spoke to you. As you, I and [AV] agreed, you would have a properly dated agreement writing off the outstanding debts Dakota has with [BT] in favor for an agreement that I said I would agree to in paying you the first 100K when I sell the company. I just need the assurance as does [AV] that this is what is happening before I call [RD]. Please get back to me soon, and help me with this, Best, Bruce

29. On May 31, 2016, Zipper e-mailed Dakota customer DG instructions on how to log into her Dakota account and obtain tax statements. Zipper provided DG with login information and a password and stated that he "tried this and it works" and offered that if the login and password provided did not work, he would "try and get your tax forms and e-mail them to you."

30. On June 1, 2016, Zipper sent at least two e-mails to Dakota customers discussing securities. In an e-mail to customer GZ, Zipper stated in part: "ESOA came out with a story yesterday announcing they are paying a dividend for the first time in their history. A .05 cents per share will be paid on June 30 to record holders on June 15th. This shows turnaround at the company and should be looked at to buy." In an e-mail to customer PM, Zipper stated in part: "ESOA announced a .05 per share dividend yesterday payable June 30 to stockholders of record June 15. So on June 30 ESOA will send your account about a thousand dollars."
31. On June 2, 2016, June 13, 2016, August 3, 2016, and August 10, 2016, Zipper e-mailed Dakota customer DG attaching her Dakota account statements.
32. On June 3, 2016, Zipper sent an e-mail to Dakota customers MG and JG soliciting their investment in RR Donnelley stock, stating in part:
- A stock I like a lot and has been getting high analyst praise is R.R. Donnelley & Sons...I strongly recommend this stock RRD to both of you. You both have large cash balances and this old time blue chip would look good in each of your portfolios. Let me know if interested, Bruce
33. On June 7, 2016, Zipper sent another e-mail to MG stating: "Hi [MG], any interest in RRD, R.R. Donnelley, highest dividend on NYSE. Started in 1864 and is spinning off 2 different divisions to existing shareholders in October."
34. On July 25, 2016, Zipper sent another e-mail to customer MG which discussed MG's investment in CalAmp (CAMP) stock holdings, stating in part: "... Your account is at its high mark of 294K of which 47K is in cash my suggestion is to buy another 700 shares (10K) and take your position to 1400 shares. let me know if interested. Bruce".

35. On June 6, 2016, Zipper sent an e-mail to customer DR, stating in part:

In reviewing your portfolio I would like to offer you a suggestion for you to consider. You still own about 8K shares of Willbros...You have 5K shares of Mechel (MTL) looks to me like dead money and a dead stock...My suggestion is sell them both, raise about 34K in cash and sit back and wait for an opportunity to add to other stocks in the portfolio making money or paying dividends. Kinder Morgan (KMI) which you own about 700 shares now and is in the black for you is one to consider...Just my thoughts to upgrade your portfolio and raise cash. Let me know if interested

36. On the same day, Zipper sent a follow up e-mail to customer DR stating: "I did forget another good company you own which is Bojangles (BOJA) 800 shares at 17.50 per share."

37. On July 29, 2016, Zipper e-mailed Dakota's e-mail archiving vendor, GR, with Zipper's e-mail signature designating himself as President of Dakota Securities, requesting that GR add new Dakota registered representative, FA, to Dakota's e-mail archives.

38. Additionally, two months into the Suspension Period, on August 1, 2016, Zipper sent an e-mail to GR from his personal gmail e-mail account, stating: "This note is to add [RL] to our management team. This note gives you guys the authorization to work with [RL] in Dakota's needs relating to our e-mail business archiving with [GR]. Thanks, Bruce Zipper, President." On the same day, Zipper requested an authorization form from GR via e-mail.

39. On August 22, 2016, Zipper sent an e-mail from his personal gmail e-mail account to Dakota shareholder and indirect lender, CF, stating:

Hi [CF], I spoke with the attorney for the claimants on the arb case today. He is drawing up a settlement where Dakota will pay 5K to settle the case. Should have the agreement by end of week. I spoke with [AV] today and he needs an e-mail from you to give forgiveness of the money's owed to

BT to complete the focus in good standing for Dakota. Please send him an e-mail and get him what he needs to complete focus. Let's meet later this week and come up with a strategy going forward for Dakota. I told you I would resolve all our issues and I did. Get back to me when you can, best, Bruce

**III. Dakota Maintained Inaccurate Books and Records Misidentifying The Broker of Record For Hundreds of Trades**

40. CM, another registered representative, was associated with Dakota from November 15, 2004 through March 8, 2016. According to Dakota's Form U5 filing for CM, CM was discharged from Dakota on February 19, 2016.
41. Despite the fact that CM had been terminated, from February 22, 2016 through November 16, 2016 (excluding the Suspension Period), Zipper placed 451 trades through Dakota's trading systems under CM's representative code, DS01, or CM's joint representative code with Zipper, DS03, as evidenced by Zipper's terminal identification. These trades are detailed in **Schedule A**, attached hereto.
42. During his investigative testimony, Zipper admitted placing trades under CM's representative code and continuing to use the joint representative code for himself and CM, despite the fact the CM had been terminated because Dakota had paid for CM's New Jersey state registration and Zipper was not registered in New Jersey.
43. As a result, Zipper caused the broker of record for the 451 trades detailed in **Schedule A** to be incorrectly recorded on Dakota's order memoranda and trade confirmations.
44. Additionally, during the Suspension Period, Dakota registered representative and principal, RL, placed 202 trades under CM's representative code or CM's joint representative code. As a result, Dakota's order memoranda and trade confirmations inaccurately stated that these 202 trades were placed by CM. Attached hereto as

**Schedule B** is a list of the above-referenced trades that RL placed under CM's representative codes.

45. Moreover, during the Suspension Period, RL placed 138 trades under Zipper's representative code, DS02, or joint representative code with CM, DS03, thereby causing the broker of record for these 138 trades to be incorrectly recorded on Dakota's order memoranda and trade confirmations. These 138 trades are reflected on **Schedule C**, attached hereto.
46. Accordingly, between February 22, 2016 through November 16, 2016, Dakota's books and records contained inaccurate and false information identifying the broker of record who entered 682 trades, as reflected on **Schedules A, B and C**.

**FIRST CAUSE OF ACTION**  
**VIOLATION OF FINRA AWC**  
**(Violation of FINRA Rule 2010)**  
**(Zipper)**

47. The Department realleges and incorporates by reference paragraphs 1-46 above.
48. FINRA Rule 2010 requires associated persons to observe high standards of commercial honor and just and equitable principles of trade. It is a violation of FINRA Rule 2010 to violate the terms of a FINRA AWC.
49. By virtue of the AWC, Zipper was suspended from association with a FINRA member firm in any capacity, including clerical or ministerial functions, until he served the term of his suspension and paid the required fine.
50. Zipper's suspension was effective from May 31, 2016 through August 30, 2016.

51. From May 31, 2016 through August 30, 2016, while Zipper was suspended in all capacities, Zipper did not comply with his suspension or Dakota's WSPs regarding suspended individuals. Instead, while suspended, Zipper continued to conduct a securities business and engage in clerical and managerial activities on behalf of Dakota. Specifically, Zipper solicited the sale of securities; communicated with customers regarding securities and account holdings; provided account statements to customers; accessed Dakota's trading systems, and engaged in clerical and managerial functions on behalf of the firm, including e-mailing with firm vendors.

52. Based upon the foregoing, Zipper violated FINRA Rule 2010.

**SECOND CAUSE OF ACTION**  
**ENGAGING IN ACTIVITIES REQUIRING REGISTRATION WHILE SUSPENDED**  
**AND/OR DISQUALIFIED FROM ACTING IN THAT CAPACITY**  
**(Violation of NASD Membership and Registration Rule 1031, Article III, Section 3(b) of**  
**FINRA's By-Laws, and FINRA Rule 2010)**  
**(Zipper)**

53. The Department realleges and incorporates by reference paragraphs 1-52 above.

54. By virtue of the AWC, Zipper was suspended from association with any FINRA member firm in all capacities from May 31, 2016 through August 30, 2016.

55. NASD Membership and Registration Rule 1031 requires all persons engaged or to be engaged in the investment banking or securities business of a member who are to function as representatives to be registered as such with FINRA in the category of registration appropriate to the function to be performed as specified in NASD Membership and Registration Rule 1032. A violation of NASD Membership and Registration Rule 1031 also constitutes a violation of FINRA Rule 2010.

56. In addition, Article III, Section 3(b) of FINRA's By-Laws states that no person shall become associated with a FINRA member firm or continue to be associated with a member if that person is subject to a disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws. A violation of Article III, Section 3(b) of FINRA's By-Laws also constitutes a violation of FINRA Rule 2010.
57. During the Suspension Period, from May 31, 2016 through August 30, 2016, Zipper solicited the sale of securities to Dakota's customers and e-mailed with Dakota's customers concerning securities. These activities required registration as a General Securities Representative. However, Zipper's General Securities Representative and other registrations with FINRA were suspended during this time and he was statutorily disqualified from associating with Dakota.
58. By performing activities that required association with a FINRA member firm and registration as a General Securities Representative while his registrations were suspended and while he was statutorily disqualified, Zipper violated NASD Membership and Registration Rule 1031, FINRA Rule 2010, and Article III, Section 3(b) of FINRA's By-Laws.

**THIRD CAUSE OF ACTION**

**ALLOWING SUSPENDED PERSONS TO BE ASSOCIATED IN A CAPACITY INCONSISTENT  
WITH IMPOSED SANCTIONS AND PERMITTING AN INDIVIDUAL TO ENGAGE IN  
ACTIVITIES REQUIRING REGISTRATION WHILE SUSPENDED AND/OR DISQUALIFIED  
FROM ACTING IN THAT CAPACITY  
(Violation of NASD Membership and Registration Rule 1031, Article III, Section  
3(b) of FINRA's By-Laws, FINRA Rules 8311 and 2010)  
(Dakota)**

59. The Department realleges and incorporates by reference paragraphs 1 through 58 above.

60. FINRA Rule 8311 provides, in pertinent part: “If a person is subject to a suspension ... with a member ... or other disqualification, a member shall not allow such person to be associated with it in any capacity that is inconsistent with the sanction imposed or disqualified status, including a clerical or ministerial capacity....” A violation of FINRA Rule 8311 also constitutes a violation of FINRA Rule 2010.
61. Zipper entered into the AWC with FINRA consenting to a three month suspension from association with any FINRA member in all capacities, including clerical or ministerial functions.
62. Dakota was notified, in writing, of Zipper’s suspension and that the three month suspension would be in effect May 31, 2016 through August 30, 2016.
63. From May 31, 2016 through August 30, 2016, while Zipper was suspended in all capacities, Dakota allowed Zipper to be associated with Dakota in capacities inconsistent with the sanctions imposed by allowing Zipper to conduct a securities business and engage in clerical and managerial activities on behalf of Dakota. Specifically, Dakota allowed Zipper to solicit the sale of securities to Dakota customers, communicate with Dakota customers regarding securities and account holdings, provide account statements to customers, and engage in clerical and managerial functions on behalf of Dakota, including e-mailing with firm vendors.
64. From May 31, 2016 through August 30, 2016, Dakota permitted Zipper to access and use Dakota’s e-mail and trading systems.

65. Based upon the foregoing, Dakota violated NASD Membership and Registration Rule 1031, Article III, Section 3(b) of FINRA's By-Laws, and FINRA Rules 8311 and 2010.

**FOURTH CAUSE OF ACTION**  
**FAILURE TO ESTABLISH, MAINTAIN, AND ENFORCE A SYSTEM AND WRITTEN**  
**PROCEDURES TO SUPERVISE ITS BUSINESS AND ASSOCIATED PERSONS**  
**(Violation of FINRA Rules 3110 and 2010)**  
**(Dakota)**

66. The Department realleges and incorporates by reference paragraphs 1 through 65 above.

67. FINRA Rule 3110 requires FINRA member firms, like Dakota, to establish and maintain a system to supervise the activities of each associated person, including its registered representatives and registered principals, that is reasonably designed to achieve compliance with applicable securities laws and regulations, and the applicable rules of FINRA. A violation of FINRA Rule 3110 also constitutes a violation of FINRA Rule 2010.

68. From May 31, 2016 through August 30, 2016, while Dakota's associated registered representative and principal, Zipper, was suspended in all capacities and statutorily disqualified, Dakota failed to establish and maintain a supervisory system reasonably designed to ensure that individuals subject to a suspension were not acting in a capacity that required registration or otherwise acting in contravention of the suspension.

69. During the Suspension Period, there were numerous red flags suggesting that Zipper was violating his suspension, including, but not limited to, numerous e-mails sent by

Zipper using Dakota's e-mail system and trades being placed through Dakota's trading system under Zipper's representative code.

70. From May 31, 2016 through August 30, 2016, Dakota also failed to establish and maintain a supervisory system reasonably designed to review Dakota's electronic correspondence in accordance with FINRA rules. In fact, Dakota failed to conduct any review of the firm's electronic correspondence during this time.
71. From February 22, 2016 through November 16, 2016, Dakota failed to reasonably supervise the creation of the firm's books and records with respect to identification of the broker of record entering trades. During this time, Dakota's registered principals, Zipper and RL, recorded trades with CM as the representative of record even though CM was no longer associated with the firm. Further, RL entered trades under Zipper's representative code when Zipper was suspended. The use of terminated or suspended representatives' codes by the firm's registered principals when entering trades should have alerted Dakota that its books and records with respect to these trades were inaccurate.
72. Based upon the foregoing, Dakota violated FINRA Rules 3110 and 2010.

**FIFTH CAUSE OF ACTION**  
**MAINTAINING INACCURATE BOOKS AND RECORDS**  
**WITH RESPECT TO IDENTIFYING THE BROKER ENTERING TRADES**  
**(Violation of FINRA Rules 4511 and 2010)**  
**(Zipper and Dakota)**

**(Willful Violation of Section 17(a) of the Exchange Act and Rule 17a-3)**  
**(Dakota)**

73. The Department realleges and incorporates by reference paragraphs 1 through 72 above.

74. FINRA Rule 4511 requires that every member “shall make and preserve books and records as required under the FINRA rules, the Exchange Act and the applicable Exchange Act rules.”
75. Exchange Act Rule 17a-3(a)(6) requires that every member firm make and keep current a memorandum of each brokerage order which shall state, *inter alia*, the identity of the associated person who entered or accepted the order on behalf of the customer.
76. From February 22, 2016 through November 16, 2016, Zipper placed 451 trades, as reflected on **Schedule A**, under CM’s joint or individual representative code when the trades were actually effected by Zipper. Zipper caused these trades to be incorrectly recorded on Dakota’s order memoranda and trade confirmations.
77. As a result of entering trades using CM’s joint or individual representative code, Zipper caused Dakota to maintain inaccurate books and records and caused Dakota to willfully violate Section 17(a) of the Exchange Act and Rule 17a-3 thereunder in violation of FINRA Rules 4511 and 2010.
78. Additionally, from May 31, 2016 through August 30, 2016, RL, another principal and associated person of Dakota, placed 202 trades, as reflected on **Schedule B**, under CM’s individual or joint representative code when these trades were actually effected by RL. RL caused these trades to be incorrectly recorded on Dakota’s order memoranda and trade confirmations.
79. Further, from May 31, 2016 through August 30, 2016, RL placed 138 trades, as reflected on **Schedule C**, under Zipper’s representative codes when these trades were

actually effected by RL. RL caused these trades to be incorrectly recorded on Dakota's order memoranda and trade confirmations.

80. As a result of both RL and Zipper's conduct, Dakota maintained inaccurate books and records in violation of Section 17(a) of the Exchange Act and Rule 17a-3 thereunder.
81. Zipper and RL, acting as principals of Dakota when they entered the trades at issue, knew the information they entered into Dakota's trading system identifying the broker of record for these trades was false and inaccurate, as they each knew that they were the representative actually responsible for these transactions and they knew CM was no longer associated with Dakota.
82. As a result of the foregoing conduct, Respondent Dakota willfully violated Rule 17(a) of the Exchange Act and Rule 17a-3 thereunder, and Dakota and Zipper violated FINRA Rules 4511 and 2010.

### **RELIEF REQUESTED**

WHEREFORE, the Department respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondents committed the violations charged and alleged herein;
- B. make specific findings that Respondent Dakota willfully violated Section 17(a) of the Exchange Act and Rule 17a-3 thereunder;
- C. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed; and
- D. order that Respondents 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:

11/8/2017



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# Exhibit 1



## NOTICE OF ACCEPTANCE OF AWC

### Certified, Return Receipt Requested

TO: Bruce Martin Zipper  


FROM: FINRA, Department of Enforcement  
5200 Town Center Circle  
Tower 1, Suite 200  
Boca Raton, FL 33486

DATE: April 22, 2016

RE: Notice of Acceptance of Letter of Acceptance, Waiver and Consent No. 2015046512101

Please be advised that your above-referenced Letter of Acceptance, Waiver and Consent ("AWC") has been accepted by FINRA's National Adjudicatory Council ("NAC") Review Subcommittee, or by the Office of Disciplinary Affairs on behalf of the NAC pursuant to FINRA Rule 9216. A copy of the executed AWC is enclosed.

You are hereby reminded of your obligation, if currently registered, to immediately update your Form U4 (Uniform Application for Securities Industry Registration or Transfer) to reflect the conclusion of this disciplinary action. Additionally, you must also notify FINRA in writing of any change of address or other changes required to be made to your Form U4. Please also note that this disciplinary action may change and/or advance the date by which you must complete your continuing education.

You will be notified by FINRA's Registration and Disclosure Department regarding sanctions if a suspension has been imposed. If a fine has been imposed, you will be contacted by FINRA's Finance Department regarding payment.

If you have any questions concerning this matter, please call me at 561-443-8015.

Sincerely,



Kevin D. Rosen  
Senior Regional Counsel

Enclosure

**FINANCIAL INDUSTRY REGULATORY AUTHORITY  
LETTER OF ACCEPTANCE, WAIVER AND CONSENT  
NO. 2015046512101**

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

**RE:** Bruce Martin Zipper, Respondent  
General Securities Principal  
CRD No. 1019731

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

**I.**

**ACCEPTANCE AND CONSENT**

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

**BACKGROUND**

Bruce Martin Zipper ("Zipper") entered the securities industry in 1981. At various times since 1981, Zipper was associated with FINRA members and obtained the following FINRA licenses: Series 7 (General Securities Representative), Series 4 (Registered Options Principal), Series 24 (General Securities Principal), Series 27 (Financial and Operations Principal) and Series 63 (State Agent). Since August 2004, Zipper has been associated with Dakota Securities International, Inc. ("DSI"). Zipper is subject to FINRA's jurisdiction because he is currently registered through a FINRA member.

**RELEVANT DISCIPLINARY HISTORY**

On or about January 27, 1989, FINRA accepted an Offer of Settlement wherein Zipper was censured and fined \$1,000, jointly and severally with Vanguard Securities. That firm, acting through Zipper, effected transactions in non-exempt securities while failing to maintain sufficient net capital to conduct a securities business.

On or about October 31, 1994, FINRA imposed a censure, \$5,000 fine and suspension from association with any FINRA member in any capacity for five business days, for Zipper's failure to honor an arbitration award. On or about April 17, 1995, the U.S. Securities and Exchange Commission sustained the sanctions.

On or about November 17, 1995, the Florida Department of Banking and Finance entered into a Stipulation and Consent Agreement. Zipper agreed to cease and desist from any and all future violations of Chapter 517, Florida statutes, and the rules thereunder, and pay a \$1,000 fine. Zipper violated the terms of his registration agreement, failed to timely notify the Department of a FINRA action, and failed to satisfy margin deficiencies in a manner prescribed by the Federal Reserve.

On or about November 24, 2009, the Florida Office of Financial Regulation entered into a Stipulation and Consent Agreement. DSI and Zipper were jointly and severally fined \$5,000 and required to amend DSI's written supervisory procedures to be consistent with its practices and comply with the independent testing requirements pursuant to NASD Rule 3011. DSI and Zipper had failed to provide independent testing of DSI's anti-money laundering compliance program in 2006 when Zipper had tested the program and failed to enforce DSI's written supervisory procedures.

### **OVERVIEW**

While Zipper was associated with DSI, Zipper willfully failed to timely amend his Uniform Application for Securities Industry Registration and Transfer ("Form U4") to disclose three unsatisfied judgments against him.

### **FACTS AND VIOLATIVE CONDUCT**

Article V, Section 2(c) of FINRA's By-Laws provides that every application for registration filed with FINRA shall be kept current at all times by supplementary amendments which must be filed within thirty days after learning of the facts or circumstances giving rise to the amendment.

Since at least 2009, Disclosure Question 14M of Form U4 has read: "Do you have any unsatisfied judgments or liens against you?"

FINRA Rule 1122 provides that: "No member or person associated with a member shall file with FINRA information with respect to membership or registration which is incomplete or inaccurate so as to be misleading, or which could in any way tend to mislead, or fail to correct such filing after notice thereof."

Zipper failed to timely amend his Form U4 to disclose three judgments. First, on or about November 25, 2009, Sutter Holding Company, Inc. f/k/a Shochet Holding Company, Inc. ("SHC") obtained a Final Judgment of Attorney's Fees against Zipper in the amount of \$11,083. Zipper knew or should have known about this judgment on or about November 25, 2009. Second, on or about June 11, 2012, SHC obtained a Final Judgment Awarding Appellate Fees against Zipper in the amount of \$1,872, plus post-judgment interest. Zipper knew or should have known about this judgment on or around June 11, 2012. Third, on or about October 14, 2014, Fidelity Bank obtained a Final Judgment against Zipper in the amount of \$8,227.17, plus interest. Zipper knew or should have known about this judgment on or around October 14, 2014. Zipper knew that none of these three judgments against him had been satisfied. Despite his knowledge of these unsatisfied judgments, Zipper willfully failed to timely amend his Form U4 to disclose the judgments within 30 days of learning of each of them. Indeed, Zipper failed to update his Form U4 to disclose the first and third judgments until November 13, 2015. Zipper failed to update his Form U4 to disclose the second judgment until March 16, 2016.

As a result of the foregoing conduct, Zipper willfully failed to timely amend his Form U4 to disclose the judgments, in contravention of Article V, Section 2 of FINRA's By-Laws, and in violation of FINRA Rules 1122 and 2010.

**B. I also consent to the imposition of the following sanctions:**

- A three-month suspension from association with any FINRA member in all capacities; and
- A fine in the amount of \$5,000.

Respondent has submitted a sworn financial statement and demonstrated a limited ability to pay. In light of the financial status of Respondent, a fine of \$5,000 has been imposed.

My limited ability to pay has been considered in connection with the monetary sanction imposed in this matter. I specifically and voluntarily waive any right to claim that I am unable to pay at any time hereafter the monetary sanction imposed in this matter.

I agree to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. I have submitted an Election of Payment form showing the method by which I propose to pay the fine imposed.

I understand that if I am barred or suspended from associating with any FINRA member, I become subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, I may not be associated with any

FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension (~~see~~ FINRA Rules 8310 and 8311).

I understand that this settlement includes a finding that I willfully omitted to state a material fact on a Form U4, and that under Section 3(a)(39)(F) of the Securities Exchange Act of 1934 and Article III, Section 4 of FINRA's By-Laws, this omission makes me subject to a statutory disqualification with respect to association with a member.

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

## **II.**

### **WAIVER OF PROCEDURAL RIGHTS**

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

- A. To have a Complaint issued specifying the allegations against me;
- 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, I specifically and voluntarily waive 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.

I further specifically and voluntarily waive any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

### **III.**

#### **OTHER MATTERS**

**I understand that:**

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs ("ODA"), pursuant to FINRA Rule 9216;**
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and**
- C. If accepted:**
  - 1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;**
  - 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. I 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. I 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 my: (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. I may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. I understand that I 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.**

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

04/17/16  
Date (mm/dd/yyyy)

Bruce Martin Zipper  
Bruce Martin Zipper, Respondent

Accepted by FINRA:

04/22/2016  
Date

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

Kevin D. Rosen  
Kevin D. Rosen, Senior Regional Counsel  
FINRA Department of Enforcement  
5200 Town Center Circle  
Tower I, Suite 200  
Boca Raton, Florida 33486  
Phone: (561) 443-8015; Fax (561) 443-7998  
E-mail: kevin.rosen@finra.org

### ELECTION OF PAYMENT FORM

I intend to pay the fine set forth in the attached Letter of Acceptance, Waiver and Consent by the following method (check one):

- ☐ A personal, business or bank check for the full amount;
- ☐ Wire transfer;
- ☐ Credit card authorization for the full amount;<sup>1</sup> or
- ☒ The installment payment plan (only if approved by FINRA staff and the Office of Disciplinary Affairs).<sup>2</sup>

Respectfully submitted,

Date

4/1/16

Bruce Martin Zippel Respondent

<sup>1</sup> You may pay a fine of \$50,000.00 or less using a credit card. Only Mastercard, Visa and American Express are accepted for payment by credit card. If this option is chosen, the appropriate forms will be mailed to you, with an invoice, by FINRA's Finance Department. Do not include your credit card number on this form.

<sup>2</sup> The installment payment plan is only available for fines of \$5,000 or more. Certain interest payments, minimum initial and monthly payments, and other requirements apply. You must discuss these terms with FINRA staff prior to requesting this method of payment.

# Schedule A

**Schedule A**

|    | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 1  | PS       | DS01   | 2/22/2016  | U S STEM CELL INC        | Buy              | 4,100          | \$40              | \$1,435          | BPVO        |
| 2  | SK       | DS01   | 2/22/2016  | ENERGY SERVICES          | Buy              | 1,000          | \$40              | \$1,450          | BPVO        |
| 3  | SK       | DS01   | 2/22/2016  | ENERGY SERVICES          | Buy              | 800            | \$25              | \$1,160          | BPVO        |
| 4  | PS       | DS01   | 2/23/2016  | CHESAPEAKE GOLD CORP     | Sell             | 500            | \$30              | \$900            | BPVO        |
| 5  | JA       | DS03   | 2/23/2016  | CALL NETFLIX INC         | Buy              | 10             | \$30              | \$1,240          | BPVO        |
| 6  | AF       | DS03   | 2/23/2016  | WORLDS INC NEW           | Buy              | 52,000         | \$40              | \$1,248          | BPVO        |
| 7  | SR       | DS03   | 2/24/2016  | ENERGY SERVICES          | Sell             | 1,000          | \$40              | \$1,450          | BPVO        |
| 8  | CD       | DS03   | 2/24/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$60              | \$1,140          | BPVO        |
| 9  | CD       | DS03   | 2/24/2016  | CALL KINDER MORGAN INC   | Sell             | 30             | \$60              | \$750            | BPVO        |
| 10 | CD       | DS03   | 2/24/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$43              | \$580            | BPVO        |
| 11 | JA       | DS03   | 2/25/2016  | CALL NETFLIX INC         | Sell             | 10             | \$38              | \$1,830          | BPVO        |
| 12 | CD       | DS03   | 2/26/2016  | GOLDCORP INC NEW         | Buy              | 1,000          | \$25              | \$14,410         | BPVO        |
| 13 | CD       | DS03   | 2/26/2016  | CALL KINDER MORGAN INC   | Buy              | 30             | \$60              | \$1,650          | BPVO        |
| 14 | CD       | DS03   | 2/26/2016  | CALL KINDER MORGAN INC   | Sell             | 30             | \$60              | \$900            | BPVO        |
| 15 | JA       | DS03   | 2/29/2016  | CALL GILEAD SCIENCES INC | Buy              | 10             | \$35              | \$1,310          | BPVO        |
| 16 | CD       | DS03   | 2/29/2016  | CALL KINDER MORGAN INC   | Buy              | 30             | \$60              | \$1,140          | BPVO        |
| 17 | JG       | DS03   | 3/1/2016   | CALL YAHOO INC           | Buy              | 37             | \$85              | \$3,404          | BPVO        |
| 18 | JG       | DS03   | 3/1/2016   | CALL YAHOO INC           | Sell             | 20             | \$65              | \$3,620          | BPVO        |
| 19 | JF       | DS01   | 3/1/2016   | ENERGY SERVICES          | Buy              | 2,500          | \$30              | \$4,125          | BPVO        |
| 20 | JF       | DS01   | 3/1/2016   | ENERGY SERVICES          | Buy              | 2,500          | \$30              | \$4,000          | BPVO        |
| 21 | SK       | DS01   | 3/2/2016   | ENERGY SERVICES          | Buy              | 1,135          | \$43              | \$1,703          | BPVO        |
| 22 | SK       | DS01   | 3/2/2016   | HERCULES OFFSHORE INC    | Sell             | 3,000          | \$45              | \$4,815          | BPVO        |
| 23 | SK       | DS01   | 3/2/2016   | WILLBROS GROUP INC DE    | Sell             | 3,300          | \$45              | \$5,610          | BPVO        |
| 24 | CD       | DS03   | 3/2/2016   | CALL GOLDCORP INC        | Sell             | 40             | \$78              | \$800            | BPVO        |
| 25 | CD       | DS03   | 3/3/2016   | CALL GOLDCORP INC        | Buy              | 40             | \$79              | \$2,080          | BPVO        |
| 26 | CD       | DS03   | 3/3/2016   | CALL GOLDCORP INC        | Sell             | 40             | \$78              | \$800            | BPVO        |
| 27 | CD       | DS03   | 3/3/2016   | CALL SILVER WHEATON CORP | Sell             | 20             | \$43              | \$460            | BPVO        |
| 28 | SR       | DS03   | 3/4/2016   | HERCULES OFFSHORE INC    | Sell             | 500            | \$30              | \$1,020          | BPVO        |
| 29 | SR       | DS03   | 3/4/2016   | WORLDS INC NEW           | Buy              | 39,000         | \$25              | \$936            | BPVO        |
| 30 | SK       | DS01   | 3/4/2016   | ENDEAVOUR SILVER CORP    | Sell             | 1,500          | \$45              | \$3,182          | BPVO        |
| 31 | SK       | DS01   | 3/4/2016   | ENDEAVOUR SILVER CORP    | Sell             | 2,000          | \$45              | \$4,462          | BPVO        |

**Schedule A**

|    | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 32 | SK       | DS01   | 3/4/2016   | ENDEAVOUR SILVER CORP    | Sell             | 100            | \$2               | \$222            | BPVO        |
| 33 | SK       | DS01   | 3/4/2016   | ENDEAVOUR SILVER CORP    | Sell             | 2,900          | \$50              | \$6,413          | BPVO        |
| 34 | SK       | DS01   | 3/4/2016   | ENDEAVOUR SILVER CORP    | Sell             | 5,000          | \$72              | \$11,264         | BPVO        |
| 35 | SK       | DS01   | 3/4/2016   | ENERGY SERVICES          | Buy              | 1,065          | \$35              | \$1,693          | BPVO        |
| 36 | CD       | DS03   | 3/4/2016   | ENERGY SERVICES          | Buy              | 100            | \$1               | \$147            | BPVO        |
| 37 | CD       | DS03   | 3/4/2016   | CALL SILVER WHEATON CORP | Sell             | 20             | \$43              | \$720            | BPVO        |
| 38 | CD       | DS03   | 3/4/2016   | CALL GOLDCORP INC        | Buy              | 40             | \$78              | \$4,320          | BPVO        |
| 39 | CD       | DS03   | 3/4/2016   | CALL SILVER WHEATON CORP | Buy              | 20             | \$43              | \$1,300          | BPVO        |
| 40 | SR       | DS03   | 3/7/2016   | HERCULES OFFSHORE INC    | Sell             | 700            | \$45              | \$1,863          | BPVO        |
| 41 | CD       | DS03   | 3/7/2016   | GOLDCORP INC NEW         | Sell             | 1,000          | \$25              | \$16,200         | BPVO        |
| 42 | CD       | DS03   | 3/7/2016   | GOLDCORP INC NEW         | Sell             | 1,000          | \$25              | \$15,790         | BPVO        |
| 43 | CD       | DS03   | 3/7/2016   | KINDER MORGAN INC DE     | Sell             | 1,000          | \$25              | \$18,740         | BPVO        |
| 44 | NG       | DS03   | 3/8/2016   | ENERGY SERVICES          | Sell             | 500            | \$25              | \$750            | BPVO        |
| 45 | JA       | DS03   | 3/8/2016   | CALL GILEAD SCIENCES INC | Sell             | 10             | \$40              | \$1,480          | BPVO        |
| 46 | CD       | DS03   | 3/8/2016   | ENERGY SERVICES          | Buy              | 1,800          | \$19              | \$2,700          | BPVO        |
| 47 | CD       | DS03   | 3/8/2016   | GOLDCORP INC NEW         | Buy              | 1,000          | \$25              | \$15,480         | BPVO        |
| 48 | CD       | DS03   | 3/8/2016   | CALL SILVER WHEATON CORP | Buy              | 20             | \$40              | \$280            | BPVO        |
| 49 | CD       | DS03   | 3/9/2016   | GOLDCORP INC NEW         | Sell             | 1,000          | \$25              | \$15,840         | BPVO        |
| 50 | CD       | DS03   | 3/9/2016   | PAN AMERN SILVER CORP    | Buy              | 2,000          | \$25              | \$19,960         | BPVO        |
| 51 | CD       | DS03   | 3/9/2016   | CALL PAN AMERN SILVER    | Sell             | 20             | \$43              | \$800            | BPVO        |
| 52 | PS       | DS01   | 3/10/2016  | ENTREE GOLD INC          | Sell             | 3,100          | \$9               | \$868            | BPVO        |
| 53 | SK       | DS01   | 3/10/2016  | CHESAPEAKE GOLD CORP     | Buy              | 4,000          | \$72              | \$6,760          | BPVO        |
| 54 | CD       | DS03   | 3/10/2016  | CALL GOLDCORP INC        | Sell             | 20             | \$43              | \$880            | BPVO        |
| 55 | CD       | DS03   | 3/10/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$43              | \$500            | BPVO        |
| 56 | PS       | DS01   | 3/11/2016  | CHESAPEAKE GOLD CORP     | Sell             | 1,500          | \$40              | \$2,520          | BPVO        |
| 57 | PS       | DS01   | 3/11/2016  | ENTREE GOLD INC          | Sell             | 6,900          | \$35              | \$1,882          | BPVO        |
| 58 | SR       | DS03   | 3/11/2016  | HERCULES OFFSHORE INC    | Sell             | 1,200          | \$40              | \$2,700          | BPVO        |
| 59 | SR       | DS03   | 3/11/2016  | WORLDS INC NEW           | Buy              | 74,930         | \$69              | \$1,499          | BPVO        |
| 60 | CD       | DS03   | 3/11/2016  | GOLDCORP INC NEW         | Buy              | 2,000          | \$25              | \$32,680         | BPVO        |
| 61 | CD       | DS03   | 3/11/2016  | KINDER MORGAN INC DE     | Sell             | 2,000          | \$25              | \$37,361         | BPVO        |
| 62 | CD       | DS03   | 3/11/2016  | CALL SILVER WHEATON CORP | Buy              | 20             | \$44              | \$700            | BPVO        |

**Schedule A**

|    | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 63 | SK       | DS01   | 3/14/2016  | CHESAPEAKE GOLD CORP     | Buy              | 2,393          | \$39              | \$3,757          | BPVO        |
| 64 | AF       | DS03   | 3/14/2016  | WORLDS INC NEW           | Buy              | 47,243         | \$38              | \$898            | BPVO        |
| 65 | CD       | DS03   | 3/14/2016  | GOLDCORP INC NEW         | Buy              | 1,000          | \$25              | \$15,880         | BPVO        |
| 66 | CD       | DS03   | 3/14/2016  | CALL PAN AMERN SILVER    | Buy              | 20             | \$43              | \$800            | BPVO        |
| 67 | RG       | DS03   | 3/15/2016  | PUT POWERSHARES QQQ TR   | Buy              | 8              | \$24              | \$272            | BPVO        |
| 68 | SK       | DS01   | 3/15/2016  | NEOTHETICS INC           | Buy              | 5,000          | \$50              | \$3,600          | BPVO        |
| 69 | CD       | DS03   | 3/15/2016  | KINDER MORGAN INC DE     | Buy              | 2,000          | \$25              | \$35,478         | BPVO        |
| 70 | CD       | DS03   | 3/15/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$65              | \$1,080          | BPVO        |
| 71 | JA       | DS03   | 3/16/2016  | NEOTHETICS INC           | Buy              | 3,000          | \$40              | \$2,129          | BPVO        |
| 72 | SK       | DS01   | 3/16/2016  | CHESAPEAKE GOLD CORP     | Buy              | 1,607          | \$50              | \$2,619          | BPVO        |
| 73 | SK       | DS01   | 3/16/2016  | NEOTHETICS INC           | Sell             | 5,000          | \$60              | \$4,100          | BPVO        |
| 74 | CD       | DS03   | 3/16/2016  | KINDER MORGAN INC DE     | Sell             | 2,000          | \$25              | \$37,341         | BPVO        |
| 75 | CD       | DS03   | 3/16/2016  | NEOTHETICS INC           | Buy              | 3,366          | \$24              | \$2,390          | BPVO        |
| 76 | CD       | DS03   | 3/16/2016  | NEOTHETICS INC           | Buy              | 3,500          | \$25              | \$2,554          | BPVO        |
| 77 | CD       | DS03   | 3/16/2016  | CALL GOLDCORP INC        | Buy              | 30             | \$60              | \$2,250          | BPVO        |
| 78 | CD       | DS03   | 3/17/2016  | ENDEAVOUR SILVER CORP    | Buy              | 10,000         | \$25              | \$25,690         | BPVO        |
| 79 | CD       | DS03   | 3/17/2016  | NEOTHETICS INC           | Buy              | 3,134          | \$25              | \$2,288          | BPVO        |
| 80 | CD       | DS03   | 3/17/2016  | PAN AMERN SILVER CORP    | Sell             | 2,000          | \$25              | \$21,660         | BPVO        |
| 81 | CD       | DS03   | 3/17/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$43              | \$380            | BPVO        |
| 82 | CD       | DS03   | 3/17/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$63              | \$990            | BPVO        |
| 83 | RG       | DS03   | 3/18/2016  | PUT SPDR S&P 500 ETF TR  | Buy              | 8              | \$25              | \$288            | BPVO        |
| 84 | SK       | DS01   | 3/18/2016  | NEOTHETICS INC           | Buy              | 6,000          | \$48              | \$4,200          | BPVO        |
| 85 | AF       | DS03   | 3/18/2016  | WORLDS INC NEW           | Buy              | 70,000         | \$40              | \$1,330          | BPVO        |
| 86 | CD       | DS03   | 3/18/2016  | CALL GOLDCORP INC        | Buy              | 30             | \$62              | \$120            | BPVO        |
| 87 | CD       | DS03   | 3/21/2016  | ENDEAVOUR SILVER CORP    | Sell             | 10,000         | \$25              | \$26,700         | BPVO        |
| 88 | CD       | DS03   | 3/21/2016  | KINDER MORGAN INC DE     | Buy              | 2,000          | \$25              | \$36,778         | BPVO        |
| 89 | CD       | DS03   | 3/21/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$63              | \$990            | BPVO        |
| 90 | SK       | DS01   | 3/22/2016  | NEOTHETICS INC           | Buy              | 4,000          | \$45              | \$2,670          | BPVO        |
| 91 | CD       | DS03   | 3/22/2016  | CALL KINDER MORGAN INC   | Sell             | 20             | \$43              | \$500            | BPVO        |
| 92 | CD       | DS03   | 3/22/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$44              | \$620            | BPVO        |
| 93 | DG       | DS01   | 3/24/2016  | ENTREE GOLD INC          | Sell             | 5,500          | \$25              | \$1,501          | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 94  | SK       | DS01   | 3/28/2016  | NEOTHETICS INC           | Sell             | 350            | \$2               | \$242            | BPVO        |
| 95  | SK       | DS01   | 3/28/2016  | NEOTHETICS INC           | Sell             | 9,650          | \$45              | \$6,466          | BPVO        |
| 96  | CD       | DS03   | 3/28/2016  | ENERGY SERVICES          | Buy              | 2,423          | \$25              | \$3,599          | BPVO        |
| 97  | CD       | DS03   | 3/28/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$45              | \$840            | BPVO        |
| 98  | RG       | DS03   | 3/29/2016  | PUT SPDR S&P 500 ETF TR  | Buy              | 9              | \$30              | \$288            | BPVO        |
| 99  | SG       | DS03   | 3/29/2016  | CALL FIRST SOLAR INC     | Sell             | 4              | \$78              | \$1,200          | BPVO        |
| 100 | SR       | DS03   | 3/30/2016  | NEOTHETICS INC           | Buy              | 3,000          | \$65              | \$1,800          | BPVO        |
| 101 | SG       | DS03   | 3/30/2016  | CALL TASER INTL INC      | Sell             | 12             | \$81              | \$1,080          | BPVO        |
| 102 | CD       | DS03   | 3/30/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$60              | \$930            | BPVO        |
| 103 | CD       | DS03   | 3/30/2016  | CALL KINDER MORGAN INC   | Sell             | 20             | \$44              | \$480            | BPVO        |
| 104 | SK       | DS01   | 4/1/2016   | PUT POWERSHARES QQQ TR   | Buy              | 10             | \$65              | \$2,380          | BPVO        |
| 105 | CD       | DS03   | 4/4/2016   | CALL SILVER WHEATON CORP | Sell             | 20             | \$44              | \$820            | BPVO        |
| 106 | CD       | DS03   | 4/4/2016   | CALL GOLDCORP INC        | Sell             | 30             | \$60              | \$1,050          | BPVO        |
| 107 | CD       | DS03   | 4/4/2016   | CALL KINDER MORGAN INC   | Sell             | 20             | \$45              | \$700            | BPVO        |
| 108 | JG       | DS03   | 4/5/2016   | CALL YAHOO INC           | Sell             | 37             | \$110             | \$7,030          | BPVO        |
| 109 | JG       | DS03   | 4/5/2016   | CALL YAHOO INC           | Buy              | 50             | \$88              | \$4,000          | BPVO        |
| 110 | JG       | DS03   | 4/5/2016   | CALL YAHOO INC           | Buy              | 35             | \$69              | \$2,765          | BPVO        |
| 111 | SK       | DS01   | 4/5/2016   | ENERGY SERVICES          | Buy              | 1,000          | \$25              | \$1,470          | BPVO        |
| 112 | SK       | DS01   | 4/5/2016   | XYLEM INC                | Sell             | 400            | \$58              | \$16,556         | BPVO        |
| 113 | SK       | DS01   | 4/5/2016   | XYLEM INC                | Sell             | 305            | \$76              | \$12,533         | BPVO        |
| 114 | CD       | DS03   | 4/5/2016   | WILLBROS GROUP INC DE    | Buy              | 5,000          | \$25              | \$10,150         | BPVO        |
| 115 | RG       | DS03   | 4/6/2016   | PUT POWERSHARES QQQ TR   | Buy              | 10             | \$30              | \$360            | BPVO        |
| 116 | MG       | DS03   | 4/6/2016   | FIRST SOLAR INC          | Buy              | 150            | \$88              | \$9,306          | BPVO        |
| 117 | SK       | DS01   | 4/7/2016   | CHESAPEAKE GOLD CORP     | Sell             | 1,000          | \$22              | \$1,850          | BPVO        |
| 118 | SK       | DS01   | 4/7/2016   | CHESAPEAKE GOLD CORP     | Sell             | 2,000          | \$65              | \$3,640          | BPVO        |
| 119 | SK       | DS01   | 4/7/2016   | PUT POWERSHARES QQQ TR   | Sell             | 10             | \$35              | \$2,770          | BPVO        |
| 120 | CD       | DS03   | 4/7/2016   | CALL SILVER WHEATON CORP | Buy              | 20             | \$43              | \$860            | BPVO        |
| 121 | CD       | DS03   | 4/7/2016   | CALL GOLDCORP INC        | Buy              | 30             | \$60              | \$1,140          | BPVO        |
| 122 | CD       | DS03   | 4/7/2016   | CALL GOLDCORP INC        | Sell             | 30             | \$60              | \$510            | BPVO        |
| 123 | SK       | DS01   | 4/8/2016   | CHESAPEAKE GOLD CORP     | Sell             | 2,500          | \$55              | \$4,675          | BPVO        |
| 124 | CD       | DS03   | 4/8/2016   | SILVER WHEATON CORP      | Sell             | 2,000          | \$25              | \$33,000         | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 125 | CD       | DS03   | 4/8/2016   | WILLBROS GROUP INC DE    | Sell             | 5,000          | \$25              | \$10,350         | BPVO        |
| 126 | CD       | DS03   | 4/8/2016   | CALL GOLDCORP INC        | Sell             | 30             | \$60              | \$840            | BPVO        |
| 127 | CD       | DS03   | 4/8/2016   | CALL GOLDCORP INC        | Buy              | 30             | \$60              | \$690            | BPVO        |
| 128 | SK       | DS01   | 4/11/2016  | CHESAPEAKE GOLD CORP     | Sell             | 2,500          | \$58              | \$4,825          | BPVO        |
| 129 | SG       | DS03   | 4/12/2016  | AMTRUST FINANCIAL SVCS   | Buy              | 100            | \$21              | \$2,437          | BPVO        |
| 130 | SG       | DS03   | 4/12/2016  | AMTRUST FINANCIAL SVCS   | Buy              | 300            | \$82              | \$7,313          | BPVO        |
| 131 | SG       | DS03   | 4/12/2016  | YAHOO INC                | Sell             | 300            | \$82              | \$10,956         | BPVO        |
| 132 | CD       | DS03   | 4/12/2016  | BARRICK GOLD CORP        | Buy              | 2,000          | \$25              | \$33,018         | BPVO        |
| 133 | CD       | DS03   | 4/12/2016  | CALL BARRICK GOLD CORP   | Sell             | 20             | \$45              | \$680            | BPVO        |
| 134 | CD       | DS03   | 4/12/2016  | CALL GOLDCORP INC        | Buy              | 30             | \$60              | \$2,400          | BPVO        |
| 135 | CD       | DS03   | 4/12/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$60              | \$750            | BPVO        |
| 136 | JA       | DS03   | 4/13/2016  | REPROS THERAPEUTICS INC  | Buy              | 1,000          | \$30              | \$1,040          | BPVO        |
| 137 | JA       | DS03   | 4/13/2016  | CALL REPROS THERAPEUTICS | Sell             | 30             | \$60              | \$900            | BPVO        |
| 138 | SK       | DS01   | 4/13/2016  | NEOTHETICS INC           | Buy              | 2,100          | \$13              | \$1,239          | BPVO        |
| 139 | BL       | DS01   | 4/13/2016  | ENERGY SERVICES          | Sell             | 2,000          | \$45              | \$3,003          | BPVO        |
| 140 | CD       | DS03   | 4/13/2016  | CALL KINDER MORGAN INC   | Buy              | 20             | \$43              | \$1,080          | BPVO        |
| 141 | CD       | DS03   | 4/13/2016  | CALL KINDER MORGAN INC   | Sell             | 20             | \$42              | \$500            | BPVO        |
| 142 | SK       | DS01   | 4/14/2016  | NEOTHETICS INC           | Sell             | 2,100          | \$25              | \$1,512          | BPVO        |
| 143 | CD       | DS03   | 4/14/2016  | NEOTHETICS INC           | Sell             | 10,000         | \$25              | \$7,300          | BPVO        |
| 144 | SK       | DS01   | 4/15/2016  | WORLDS INC NEW           | Buy              | 20,000         | \$25              | \$360            | BPVO        |
| 145 | CD       | DS03   | 4/15/2016  | BARRICK GOLD CORP        | Buy              | 1,000          | \$25              | \$15,500         | BPVO        |
| 146 | JA       | DS03   | 4/18/2016  | WORLDS INC NEW           | Buy              | 50,000         | \$35              | \$950            | BPVO        |
| 147 | SK       | DS01   | 4/18/2016  | PUT POWERSHARES QQQ TR   | Buy              | 10             | \$35              | \$1,960          | BPVO        |
| 148 | CD       | DS03   | 4/18/2016  | CALL KINDER MORGAN INC   | Sell             | 20             | \$43              | \$1,000          | BPVO        |
| 149 | CD       | DS03   | 4/19/2016  | CALL BARRICK GOLD CORP   | Sell             | 30             | \$62              | \$990            | BPVO        |
| 150 | CD       | DS03   | 4/19/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$62              | \$1,050          | BPVO        |
| 151 | RG       | DS03   | 4/20/2016  | HOOPER HOLMES INC        | Sell             | 2,397          | \$20              | \$314            | BPVO        |
| 152 | RG       | DS03   | 4/20/2016  | VIOLIN MEMORY INC        | Buy              | 1,800          | \$25              | \$630            | BPVO        |
| 153 | CD       | DS03   | 4/20/2016  | CALL BARRICK GOLD CORP   | Buy              | 27             | \$54              | \$108            | BPVO        |
| 154 | PM       | DS03   | 4/20/2016  | ENDEAVOUR SILVER CORP    | Sell             | 2,000          | \$75              | \$8,202          | BPVO        |
| 155 | SK       | DS01   | 4/21/2016  | PUT POWERSHARES QQQ TR   | Sell             | 10             | \$40              | \$2,080          | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 156 | RG       | DS03   | 4/21/2016  | WORLDS INC NEW           | Buy              | 20,000         | \$20              | \$330            | BPVO        |
| 157 | JA       | DS03   | 4/22/2016  | CALL FACEBOOK INC CL A   | Buy              | 10             | \$38              | \$1,300          | BPVO        |
| 158 | SR       | DS03   | 4/22/2016  | NEOTHETICS INC           | Sell             | 3,000          | \$60              | \$2,595          | BPVO        |
| 159 | SR       | DS03   | 4/22/2016  | WORLDS INC NEW           | Buy              | 40,000         | \$45              | \$676            | BPVO        |
| 160 | CD       | DS03   | 4/22/2016  | KINDER MORGAN INC DE     | Sell             | 2,000          | \$25              | \$36,220         | BPVO        |
| 161 | CD       | DS03   | 4/22/2016  | SILVER WHEATON CORP      | Buy              | 2,000          | \$25              | \$36,740         | BPVO        |
| 162 | CD       | DS03   | 4/22/2016  | CALL GOLDCORP INC        | Buy              | 30             | \$60              | \$60             | BPVO        |
| 163 | CD       | DS03   | 4/22/2016  | CALL KINDER MORGAN INC   | Buy              | 20             | \$42              | \$360            | BPVO        |
| 164 | CD       | DS03   | 4/22/2016  | CALL GOLDCORP INC        | Sell             | 30             | \$60              | \$990            | BPVO        |
| 165 | CD       | DS03   | 4/22/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$40              | \$500            | BPVO        |
| 166 | JA       | DS03   | 4/25/2016  | NEOTHETICS INC           | Sell             | 1,000          | \$35              | \$1,500          | BPVO        |
| 167 | JA       | DS03   | 4/26/2016  | NEOTHETICS INC           | Sell             | 2,000          | \$38              | \$2,360          | BPVO        |
| 168 | SK       | DS01   | 4/26/2016  | HERCULES OFFSHORE INC    | Buy              | 1,500          | \$45              | \$2,895          | BPVO        |
| 169 | JA       | DS03   | 4/27/2016  | CALL FACEBOOK INC CL A   | Buy              | 10             | \$38              | \$780            | BPVO        |
| 170 | SR       | DS03   | 4/27/2016  | WORLDS INC NEW           | Buy              | 108,000        | \$45              | \$1,674          | BPVO        |
| 171 | SK       | DS01   | 4/27/2016  | ENERGY SERVICES          | Buy              | 1,000          | \$35              | \$1,470          | BPVO        |
| 172 | SK       | DS01   | 4/27/2016  | HERCULES OFFSHORE INC    | Sell             | 1,501          | \$40              | \$3,362          | BPVO        |
| 173 | JLZ      | DS03   | 4/27/2016  | CHESAPEAKE GOLD CORP     | Sell             | 1,400          | \$40              | \$3,850          | BPVO        |
| 174 | JLZ      | DS03   | 4/27/2016  | WORLDS INC NEW           | Buy              | 30,000         | \$25              | \$480            | BPVO        |
| 175 | JLZ      | DS03   | 4/27/2016  | WORLDS INC NEW           | Buy              | 100,000        | \$35              | \$1,600          | BPVO        |
| 176 | JLZ      | DS03   | 4/27/2016  | WORLDS INC NEW           | Buy              | 100,000        | \$40              | \$1,600          | BPVO        |
| 177 | CD       | DS03   | 4/27/2016  | CALL BARRICK GOLD CORP   | Sell             | 30             | \$60              | \$1,200          | BPVO        |
| 178 | JA       | DS03   | 4/28/2016  | CALL FACEBOOK INC CL A   | Buy              | 10             | \$30              | \$1,250          | BPVO        |
| 179 | JA       | DS03   | 4/28/2016  | CALL FACEBOOK INC CL A   | Sell             | 10             | \$75              | \$3,200          | BPVO        |
| 180 | JA       | DS03   | 4/28/2016  | CALL FACEBOOK INC CL A   | Sell             | 10             | \$65              | \$2,150          | BPVO        |
| 181 | CD       | DS03   | 4/28/2016  | CALL BARRICK GOLD CORP   | Buy              | 30             | \$60              | \$3,060          | BPVO        |
| 182 | CD       | DS03   | 4/28/2016  | CALL BARRICK GOLD CORP   | Sell             | 30             | \$60              | \$1,800          | BPVO        |
| 183 | CD       | DS03   | 4/28/2016  | CALL BARRICK GOLD CORP   | Buy              | 30             | \$60              | \$2,430          | BPVO        |
| 184 | CD       | DS03   | 4/28/2016  | CALL BARRICK GOLD CORP   | Sell             | 30             | \$60              | \$900            | BPVO        |
| 185 | SK       | DS01   | 4/29/2016  | ENERGY SERVICES          | Buy              | 1,000          | \$40              | \$1,400          | BPVO        |
| 186 | SG       | DS03   | 4/29/2016  | FIRST SOLAR INC          | Sell             | 400            | \$78              | \$22,400         | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|-------------------------|------------------|----------------|-------------------|------------------|-------------|
| 187 | CD       | DS03   | 4/29/2016  | CALL GOLDCORP INC       | Buy              | 20             | \$43              | \$5,240          | BPVO        |
| 188 | CD       | DS03   | 5/2/2016   | TASER INTERNATIONAL INC | Buy              | 2,000          | \$25              | \$36,600         | BPVO        |
| 189 | CD       | DS03   | 5/2/2016   | CALL TASER INTL INC     | Sell             | 20             | \$43              | \$1,700          | BPVO        |
| 190 | JA       | DS03   | 5/3/2016   | CALL NETFLIX INC        | Buy              | 10             | \$38              | \$1,900          | BPVO        |
| 191 | CD       | DS03   | 5/3/2016   | CALL BARRICK GOLD CORP  | Buy              | 30             | \$60              | \$2,940          | BPVO        |
| 192 | SK       | DS01   | 5/4/2016   | CHESAPEAKE GOLD CORP    | Buy              | 3,000          | \$68              | \$8,370          | BPVO        |
| 193 | SK       | DS01   | 5/4/2016   | CHESAPEAKE GOLD CORP    | Buy              | 1,400          | \$28              | \$3,780          | BPVO        |
| 194 | SK       | DS01   | 5/4/2016   | TWITTER INC             | Buy              | 500            | \$69              | \$7,390          | BPVO        |
| 195 | SG       | DS03   | 5/4/2016   | KINDER MORGAN INC DE    | Sell             | 3,278          | \$110             | \$55,299         | BPVO        |
| 196 | NG       | DS03   | 5/5/2016   | PARNELL PHARMACEUTICALS | Buy              | 1,000          | \$25              | \$1,870          | BPVO        |
| 197 | MG       | DS03   | 5/5/2016   | TESLA MOTORS INC        | Sell             | 50             | \$75              | \$10,745         | BPVO        |
| 198 | CD       | DS03   | 5/5/2016   | CALL BARRICK GOLD CORP  | Sell             | 30             | \$60              | \$1,080          | BPVO        |
| 199 | CD       | DS03   | 5/6/2016   | CALL BARRICK GOLD CORP  | Sell             | 30             | \$60              | \$1,050          | BPVO        |
| 200 | CD       | DS03   | 5/6/2016   | CALL BARRICK GOLD CORP  | Buy              | 30             | \$60              | \$2,040          | BPVO        |
| 201 | CD       | DS03   | 5/6/2016   | CALL TASER INTL INC     | Buy              | 20             | \$40              | \$100            | BPVO        |
| 202 | CD       | DS03   | 5/6/2016   | CALL GOLDCORP INC       | Sell             | 20             | \$43              | \$800            | BPVO        |
| 203 | CD       | DS03   | 5/6/2016   | CALL TASER INTL INC     | Sell             | 20             | \$40              | \$500            | BPVO        |
| 204 | CD       | DS03   | 5/9/2016   | ENDEAVOUR SILVER CORP   | Buy              | 4,000          | \$25              | \$14,120         | BPVO        |
| 205 | CD       | DS03   | 5/9/2016   | CALL BARRICK GOLD CORP  | Buy              | 30             | \$60              | \$330            | BPVO        |
| 206 | CD       | DS03   | 5/9/2016   | CALL GOLDCORP INC       | Buy              | 20             | \$40              | \$220            | BPVO        |
| 207 | SK       | DS01   | 5/10/2016  | HERCULES OFFSHORE INC   | Buy              | 1,500          | \$45              | \$2,100          | BPVO        |
| 208 | CD       | DS03   | 5/10/2016  | CANARC RESOURCE CORP    | Buy              | 50,000         | \$25              | \$2,297          | BPVO        |
| 209 | CD       | DS03   | 5/10/2016  | CALL BARRICK GOLD CORP  | Sell             | 30             | \$60              | \$690            | BPVO        |
| 210 | RIG      | DS03   | 5/11/2016  | ENERGY SERVICES         | Buy              | 1,000          | \$35              | \$1,500          | BPVO        |
| 211 | SG       | DS01   | 5/12/2016  | TWITTER INC             | Buy              | 1,000          | \$83              | \$14,069         | BPVO        |
| 212 | SG       | DS01   | 5/12/2016  | CALL TWITTER INC        | Sell             | 10             | \$45              | \$1,170          | BPVO        |
| 213 | MG       | DS03   | 5/12/2016  | TWITTER INC             | Buy              | 1,000          | \$88              | \$14,290         | BPVO        |
| 214 | MG       | DS03   | 5/12/2016  | CALL TWITTER INC        | Sell             | 5              | \$40              | \$600            | BPVO        |
| 215 | SR       | DS03   | 5/13/2016  | ENERGY SERVICES         | Buy              | 2,000          | \$57              | \$2,600          | BPVO        |
| 216 | SK       | DS01   | 5/13/2016  | CHESAPEAKE GOLD CORP    | Sell             | 2,100          | \$33              | \$5,868          | BPVO        |
| 217 | CD       | DS03   | 5/13/2016  | ENDEAVOUR SILVER CORP   | Buy              | 3,000          | \$25              | \$11,007         | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|-------------------------|------------------|----------------|-------------------|------------------|-------------|
| 218 | CD       | DS03   | 5/13/2016  | CALL BARRICK GOLD CORP  | Buy              | 30             | \$60              | \$1,350          | BPVO        |
| 219 | RG       | DS03   | 5/16/2016  | PUT SPDR S&P 500 ETF TR | Buy              | 10             | \$30              | \$360            | BPVO        |
| 220 | SR       | DS03   | 5/16/2016  | WORLDS INC NEW          | Buy              | 50,000         | \$35              | \$550            | BPVO        |
| 221 | SR       | DS03   | 5/16/2016  | WORLDS INC NEW          | Buy              | 200,000        | \$50              | \$2,000          | BPVO        |
| 222 | SR       | DS03   | 5/16/2016  | WORLDS INC NEW          | Buy              | 19,100         | \$4               | \$191            | BPVO        |
| 223 | SK       | DS01   | 5/16/2016  | CHESAPEAKE GOLD CORP    | Sell             | 1,000          | \$22              | \$2,800          | BPVO        |
| 224 | SK       | DS01   | 5/16/2016  | HERCULES OFFSHORE INC   | Sell             | 1,500          | \$43              | \$2,235          | BPVO        |
| 225 | CD       | DS03   | 5/16/2016  | CALL BARRICK GOLD CORP  | Sell             | 30             | \$60              | \$1,650          | BPVO        |
| 226 | CD       | DS03   | 5/16/2016  | CALL GOLDCORP INC       | Sell             | 20             | \$43              | \$980            | BPVO        |
| 227 | SK       | DS01   | 5/17/2016  | CHESAPEAKE GOLD CORP    | Sell             | 100            | \$3               | \$284            | BPVO        |
| 228 | SK       | DS01   | 5/17/2016  | CHESAPEAKE GOLD CORP    | Sell             | 1,200          | \$40              | \$3,288          | BPVO        |
| 229 | SG       | DS01   | 5/17/2016  | SPDR DOW JONES          | Sell             | 201            | \$79              | \$35,212         | BPVO        |
| 230 | SG       | DS01   | 5/18/2016  | FIRST SOLAR INC         | Buy              | 400            | \$84              | \$19,312         | BPVO        |
| 231 | CD       | DS03   | 5/18/2016  | GOLDCORP INC NEW        | Buy              | 1,000          | \$25              | \$17,810         | BPVO        |
| 232 | CD       | DS03   | 5/18/2016  | CALL BARRICK GOLD CORP  | Buy              | 30             | \$60              | \$240            | BPVO        |
| 233 | CD       | DS03   | 5/18/2016  | CALL GOLDCORP INC       | Buy              | 20             | \$40              | \$120            | BPVO        |
| 234 | RG       | DS03   | 5/19/2016  | PUT SPDR S&P 500 ETF TR | Sell             | 5              | \$20              | \$315            | BPVO        |
| 235 | CD       | DS03   | 5/19/2016  | CANARC RESOURCE CORP    | Sell             | 50,000         | \$25              | \$2,500          | BPVO        |
| 236 | CD       | DS03   | 5/19/2016  | ENDEAVOUR SILVER CORP   | Buy              | 2,000          | \$25              | \$6,698          | BPVO        |
| 237 | CD       | DS03   | 5/19/2016  | CALL BARRICK GOLD CORP  | Sell             | 30             | \$60              | \$900            | BPVO        |
| 238 | JA       | DS03   | 5/20/2016  | CALL FACEBOOK INC CL A  | Buy              | 10             | \$35              | \$610            | BPVO        |
| 239 | SK       | DS01   | 5/20/2016  | GOPRO INC               | Buy              | 1,000          | \$76              | \$9,110          | BPVO        |
| 240 | SK       | DS01   | 5/23/2016  | WORLDS INC NEW          | Sell             | 38,000         | \$40              | \$1,710          | BPVO        |
| 241 | SG       | DS01   | 5/23/2016  | GOPRO INC               | Buy              | 2,000          | \$85              | \$18,560         | BPVO        |
| 242 | SG       | DS01   | 5/23/2016  | VALLEY NATIONAL BANCORP | Buy              | 2,000          | \$85              | \$18,340         | BPVO        |
| 243 | CD       | DS03   | 5/23/2016  | CALL GOLDCORP INC       | Sell             | 30             | \$63              | \$1,350          | BPVO        |
| 244 | RG       | DS03   | 5/24/2016  | PUT POWERSHARES QQQ TR  | Buy              | 10             | \$30              | \$270            | BPVO        |
| 245 | JA       | DS03   | 5/24/2016  | CALL NETFLIX INC        | Sell             | 10             | \$40              | \$3,000          | BPVO        |
| 246 | SK       | DS01   | 5/24/2016  | GOPRO INC               | Sell             | 1,000          | \$45              | \$9,751          | BPVO        |
| 247 | CD       | DS03   | 5/24/2016  | BARRICK GOLD CORP       | Buy              | 2,000          | \$25              | \$34,960         | BPVO        |
| 248 | CD       | DS03   | 5/24/2016  | ENDEAVOUR SILVER CORP   | Buy              | 1,000          | \$25              | \$3,240          | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|-------------------------|------------------|----------------|-------------------|------------------|-------------|
| 249 | CD       | DS03   | 5/24/2016  | CALL GOLDCORP INC       | Buy              | 30             | \$60              | \$180            | BPVO        |
| 250 | JA       | DS03   | 5/26/2016  | ENERGY SERVICES         | Buy              | 3,000          | \$45              | \$4,170          | BPVO        |
| 251 | SK       | DS01   | 5/26/2016  | TWITTER INC             | Buy              | 500            | \$72              | \$7,150          | BPVO        |
| 252 | RIG      | DS03   | 5/26/2016  | ENERGY SERVICES         | Buy              | 1,000          | \$45              | \$1,390          | BPVO        |
| 253 | SK       | DS01   | 5/27/2016  | TWITTER INC             | Sell             | 1,000          | \$65              | \$14,830         | BPVO        |
| 254 | SK       | DS01   | 8/31/2016  | FIRST SOLAR INC         | Buy              | 500            | \$60              | \$18,910         | BPVO        |
| 255 | SK       | DS01   | 8/31/2016  | CALL FIRST SOLAR INC    | Sell             | 10             | \$40              | \$300            | BPVO        |
| 256 | JLZ      | DS03   | 8/31/2016  | ATOMERA INC             | Buy              | 1,000          | \$45              | \$9,250          | BPVO        |
| 257 | JLZ      | DS03   | 8/31/2016  | ATOMERA INC             | Buy              | 700            | \$50              | \$6,482          | BPVO        |
| 258 | JLZ      | DS03   | 8/31/2016  | ENERGY SERVICES         | Sell             | 2,100          | \$50              | \$3,087          | BPVO        |
| 259 | JLZ      | DS03   | 8/31/2016  | ENERGY SERVICES         | Sell             | 4,700          | \$50              | \$6,909          | BPVO        |
| 260 | SG       | DS01   | 8/31/2016  | FACEBOOK INC CL A       | Buy              | 200            | \$75              | \$25,234         | BPVO        |
| 261 | CD       | DS03   | 8/31/2016  | GOPRO INC               | Buy              | 1,000          | \$25              | \$14,898         | BPVO        |
| 262 | CD       | DS03   | 8/31/2016  | CALL GOPRO INC          | Sell             | 10             | \$35              | \$280            | BPVO        |
| 263 | JLZ      | DS03   | 9/1/2016   | ENERGY SERVICES         | Sell             | 300            | \$6               | \$441            | BPVO        |
| 264 | RG       | DS03   | 9/2/2016   | PUT SPDR S&P 500 ETF TR | Buy              | 8              | \$25              | \$296            | BPVO        |
| 265 | JLZ      | DS03   | 9/2/2016   | ENERGY SERVICES         | Sell             | 2,100          | \$50              | \$3,087          | BPVO        |
| 266 | JLZ      | DS03   | 9/2/2016   | ENERGY SERVICES         | Sell             | 1,235          | \$17              | \$1,853          | BPVO        |
| 267 | JLZ      | DS03   | 9/2/2016   | ENERGY SERVICES         | Sell             | 2,400          | \$50              | \$3,600          | BPVO        |
| 268 | JLZ      | DS03   | 9/2/2016   | ENERGY SERVICES         | Sell             | 1,417          | \$15              | \$2,126          | BPVO        |
| 269 | SG       | DS01   | 9/2/2016   | AMTRUST FINANCIAL SVCS  | Sell             | 402            | \$69              | \$10,635         | BPVO        |
| 270 | SK       | DS01   | 9/6/2016   | OCULAR THERAPEUTIX INC  | Sell             | 1,000          | \$59              | \$6,650          | BPVO        |
| 271 | JLZ      | DS03   | 9/6/2016   | ATOMERA INC             | Buy              | 1,000          | \$45              | \$9,780          | BPVO        |
| 272 | CD       | DS03   | 9/6/2016   | CALL ENDEAVOUR SILVER   | Sell             | 70             | \$135             | \$2,100          | BPVO        |
| 273 | CD       | DS03   | 9/6/2016   | CALL GOPRO INC          | Sell             | 50             | \$98              | \$1,600          | BPVO        |
| 274 | SK       | DS01   | 9/7/2016   | OCULAR THERAPEUTIX INC  | Sell             | 500            | \$40              | \$3,435          | BPVO        |
| 275 | CD       | DS03   | 9/7/2016   | CALL GOLDCORP INC       | Sell             | 40             | \$78              | \$1,040          | BPVO        |
| 276 | NG       | DS03   | 9/8/2016   | ENERGY SERVICES         | Buy              | 300            | \$25              | \$444            | BPVO        |
| 277 | SK       | DS01   | 9/8/2016   | GOPRO INC               | Buy              | 1,000          | \$59              | \$13,590         | BPVO        |
| 278 | CD       | DS03   | 9/8/2016   | CALL GOLDCORP INC       | Buy              | 30             | \$60              | \$5,550          | BPVO        |
| 279 | RG       | DS03   | 9/9/2016   | PUT SPDR S&P 500 ETF TR | Sell             | 5              | \$20              | \$400            | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|-------------------------|------------------|----------------|-------------------|------------------|-------------|
| 280 | SK       | DS01   | 9/9/2016   | GOPRO INC               | Buy              | 1,000          | \$67              | \$13,020         | BPVO        |
| 281 | CD       | DS03   | 9/9/2016   | CALL ENDEAVOUR SILVER   | Buy              | 70             | \$137             | \$2,450          | BPVO        |
| 282 | SK       | DS01   | 9/12/2016  | ATOMERA INC             | Buy              | 1,000          | \$64              | \$9,100          | BPVO        |
| 283 | SK       | DS01   | 9/12/2016  | CALL GOPRO INC          | Sell             | 20             | \$40              | \$580            | BPVO        |
| 284 | SG       | DS01   | 9/12/2016  | DONNELLEY R R & SONS    | Buy              | 2,000          | \$88              | \$32,878         | BPVO        |
| 285 | CD       | DS03   | 9/12/2016  | GOLDCORP INC NEW        | Sell             | 2,000          | \$25              | \$32,910         | BPVO        |
| 286 | MG       | DS03   | 9/13/2016  | DONNELLEY R R & SONS    | Buy              | 1,000          | \$85              | \$15,910         | BPVO        |
| 287 | CD       | DS03   | 9/13/2016  | OCULAR THERAPEUTIX INC  | Buy              | 3,000          | \$25              | \$19,650         | BPVO        |
| 288 | CD       | DS03   | 9/13/2016  | CALL GOLDCORP INC       | Buy              | 30             | \$58              | \$3,600          | BPVO        |
| 289 | SR       | DS03   | 9/14/2016  | KERYX BIOPHARM INC      | Sell             | 900            | \$60              | \$4,177          | BPVO        |
| 290 | SR       | DS03   | 9/14/2016  | WILLBROS GROUP INC DE   | Buy              | 2,000          | \$60              | \$3,660          | BPVO        |
| 291 | SK       | DS01   | 9/14/2016  | DONNELLEY R R & SONS    | Buy              | 1,000          | \$65              | \$15,890         | BPVO        |
| 292 | SR       | DS03   | 9/14/2016  | KERYX BIOPHARM INC      | Sell             | 900            | \$60              | \$4,186          | BPVO        |
| 293 | SR       | DS03   | 9/14/2016  | WILLBROS GROUP INC DE   | Buy              | 2,000          | \$60              | \$3,640          | BPVO        |
| 294 | RG       | DS03   | 9/15/2016  | PUT SPDR S&P 500 ETF TR | Buy              | 8              | \$20              | \$184            | BPVO        |
| 295 | SK       | DS01   | 9/15/2016  | ATOMERA INC             | Sell             | 80             | \$4               | \$740            | BPVO        |
| 296 | SK       | DS01   | 9/15/2016  | ATOMERA INC             | Sell             | 100            | \$5               | \$920            | BPVO        |
| 297 | CD       | DS03   | 9/15/2016  | OCULAR THERAPEUTIX INC  | Sell             | 3,000          | \$25              | \$19,770         | BPVO        |
| 298 | CD       | DS03   | 9/15/2016  | CALL GOPRO INC          | Sell             | 50             | \$89              | \$700            | BPVO        |
| 299 | CD       | DS03   | 9/15/2016  | CALL GOLDCORP INC       | Sell             | 50             | \$90              | \$800            | BPVO        |
| 300 | SK       | DS01   | 9/16/2016  | PARNELL PHARMACEUTICALS | Buy              | 100            | \$1               | \$154            | BPVO        |
| 301 | JLZ      | DS03   | 9/16/2016  | ENERGY SERVICES         | Sell             | 100            | \$2               | \$149            | BPVO        |
| 302 | CD       | DS03   | 9/16/2016  | GOPRO INC               | Sell             | 1,000          | \$25              | \$14,850         | BPVO        |
| 303 | CD       | DS03   | 9/16/2016  | CALL GOPRO INC          | Buy              | 50             | \$90              | \$6,250          | BPVO        |
| 304 | CD       | DS03   | 9/16/2016  | CALL GOPRO INC          | Sell             | 4              | \$8               | \$268            | BPVO        |
| 305 | CD       | DS03   | 9/16/2016  | CALL GOPRO INC          | Sell             | 36             | \$75              | \$2,340          | BPVO        |
| 306 | SK       | DS01   | 9/19/2016  | CALL OCULAR THERAPEUTIX | Sell             | 30             | \$80              | \$1,350          | BPVO        |
| 307 | CD       | DS03   | 9/19/2016  | GOPRO INC               | Sell             | 4,000          | \$25              | \$61,844         | BPVO        |
| 308 | CD       | DS03   | 9/19/2016  | SILVER WHEATON CORP     | Buy              | 2,000          | \$25              | \$53,960         | BPVO        |
| 309 | CD       | DS03   | 9/19/2016  | WILLBROS GROUP INC DE   | Buy              | 5,000          | \$25              | \$8,900          | BPVO        |
| 310 | CD       | DS03   | 9/19/2016  | CALL GOPRO INC          | Buy              | 40             | \$75              | \$3,280          | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 311 | SK       | DS01   | 9/20/2016  | GOPRO INC                | Buy              | 1,000          | \$58              | \$14,060         | BPVO        |
| 312 | SK       | DS01   | 9/20/2016  | CALL GOPRO INC           | Sell             | 10             | \$25              | \$240            | BPVO        |
| 313 | CD       | DS03   | 9/20/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$40              | \$1,180          | BPVO        |
| 314 | SK       | DS01   | 9/21/2016  | DONNELLEY R R & SONS     | Sell             | 1,000          | \$40              | \$16,243         | BPVO        |
| 315 | CD       | DS03   | 9/21/2016  | ENDEAVOUR SILVER CORP    | Sell             | 3,000          | \$25              | \$16,200         | BPVO        |
| 316 | CD       | DS03   | 9/21/2016  | ENDEAVOUR SILVER CORP    | Sell             | 4,000          | \$25              | \$22,000         | BPVO        |
| 317 | CD       | DS03   | 9/21/2016  | CALL GOLDCORP INC        | Sell             | 50             | \$85              | \$1,100          | BPVO        |
| 318 | CD       | DS03   | 9/22/2016  | CALL GOLDCORP INC        | Sell             | 50             | \$90              | \$1,500          | BPVO        |
| 319 | CD       | DS03   | 9/22/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$40              | \$1,580          | BPVO        |
| 320 | CD       | DS03   | 9/23/2016  | WILLBROS GROUP INC DE    | Sell             | 5,000          | \$25              | \$9,000          | BPVO        |
| 321 | CD       | DS03   | 9/23/2016  | CALL GOLDCORP INC        | Buy              | 50             | \$88              | \$400            | BPVO        |
| 322 | CD       | DS03   | 9/23/2016  | CALL SILVER WHEATON CORP | Buy              | 20             | \$40              | \$420            | BPVO        |
| 323 | SK       | DS01   | 9/27/2016  | CALAMP CORP              | Buy              | 1,000          | \$68              | \$16,379         | BPVO        |
| 324 | SK       | DS01   | 9/27/2016  | CALL CALAMP CORP         | Sell             | 10             | \$35              | \$400            | BPVO        |
| 325 | SK       | DS01   | 9/28/2016  | ATOMERA INC              | Sell             | 820            | \$25              | \$6,552          | BPVO        |
| 326 | SK       | DS01   | 9/28/2016  | FIRST SOLAR INC          | Buy              | 500            | \$65              | \$19,335         | BPVO        |
| 327 | SK       | DS01   | 9/28/2016  | CALL FIRST SOLAR INC     | Sell             | 5              | \$25              | \$275            | BPVO        |
| 328 | JLZ      | DS03   | 9/28/2016  | ENERGY SERVICES          | Sell             | 2,000          | \$32              | \$2,880          | BPVO        |
| 329 | CD       | DS03   | 9/28/2016  | GOLDCORP INC NEW         | Sell             | 2,000          | \$25              | \$32,140         | BPVO        |
| 330 | CD       | DS03   | 9/28/2016  | CALL GOLDCORP INC        | Buy              | 30             | \$60              | \$5,160          | BPVO        |
| 331 | CD       | DS03   | 9/28/2016  | CALL SILVER WHEATON CORP | Sell             | 20             | \$38              | \$500            | BPVO        |
| 332 | SK       | DS01   | 9/29/2016  | CALAMP CORP              | Buy              | 500            | \$60              | \$8,205          | BPVO        |
| 333 | SK       | DS01   | 9/29/2016  | CALL CALAMP CORP         | Sell             | 5              | \$25              | \$331            | BPVO        |
| 334 | JLZ      | DS03   | 9/29/2016  | ENERGY SERVICES          | Sell             | 1,083          | \$18              | \$1,560          | BPVO        |
| 335 | CD       | DS03   | 9/29/2016  | OCULAR THERAPEUTIX INC   | Sell             | 3,000          | \$25              | \$20,310         | BPVO        |
| 336 | CD       | DS03   | 9/29/2016  | OCULAR THERAPEUTIX INC   | Buy              | 3,000          | \$25              | \$20,250         | BPVO        |
| 337 | CD       | DS03   | 9/29/2016  | SILVER WHEATON CORP      | Buy              | 500            | \$25              | \$13,740         | BPVO        |
| 338 | CD       | DS03   | 9/29/2016  | SILVER WHEATON CORP      | Sell             | 500            | \$25              | \$13,831         | BPVO        |
| 339 | RG       | DS03   | 9/30/2016  | ENERGY SERVICES          | Buy              | 600            | \$25              | \$816            | BPVO        |
| 340 | JLZ      | DS03   | 9/30/2016  | RESONANT INC             | Buy              | 1,100          | \$50              | \$5,687          | BPVO        |
| 341 | CD       | DS03   | 9/30/2016  | ENERGY SERVICES          | Buy              | 5,000          | \$25              | \$6,800          | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 342 | CD       | DS03   | 9/30/2016  | OCULAR THERAPEUTIX INC   | Sell             | 4,000          | \$25              | \$27,800         | BPVO        |
| 343 | CD       | DS03   | 9/30/2016  | OCULAR THERAPEUTIX INC   | Buy              | 4,000          | \$25              | \$26,760         | BPVO        |
| 344 | CD       | DS03   | 9/30/2016  | SILVER WHEATON CORP      | Buy              | 600            | \$25              | \$16,463         | BPVO        |
| 345 | CD       | DS03   | 10/3/2016  | FIRST MINING FINANCE     | Sell             | 1,825          | \$5               | \$1,183          | BPVO        |
| 346 | PM       | DS03   | 10/3/2016  | CORNING INC              | Sell             | 400            | \$70              | \$9,448          | BPVO        |
| 347 | PM       | DS03   | 10/3/2016  | TAKE-TWO INTERACTIVE INC | Sell             | 100            | \$50              | \$4,505          | BPVO        |
| 348 | SK       | DS01   | 10/4/2016  | CALAMP CORP              | Buy              | 1,000          | \$65              | \$13,640         | BPVO        |
| 349 | CD       | DS03   | 10/4/2016  | FIRST MINING FINANCE     | Sell             | 8,175          | \$25              | \$4,782          | BPVO        |
| 350 | MG       | DS03   | 10/5/2016  | CALL TWITTER INC         | Sell             | 5              | \$45              | \$875            | BPVO        |
| 351 | CD       | DS03   | 10/5/2016  | ENDEAVOUR SILVER CORP    | Buy              | 2,000          | \$25              | \$8,740          | BPVO        |
| 352 | CD       | DS03   | 10/5/2016  | OCULAR THERAPEUTIX INC   | Buy              | 2,000          | \$25              | \$13,960         | BPVO        |
| 353 | CD       | DS03   | 10/5/2016  | SILVER WHEATON CORP      | Sell             | 600            | \$25              | \$14,305         | BPVO        |
| 354 | CD       | DS03   | 10/5/2016  | CALL OCULAR THERAPEUTIX  | Sell             | 20             | \$35              | \$600            | BPVO        |
| 355 | SK       | DS01   | 10/6/2016  | TWITTER INC              | Buy              | 1,000          | \$55              | \$19,910         | BPVO        |
| 356 | SK       | DS01   | 10/6/2016  | CALL TWITTER INC         | Sell             | 10             | \$35              | \$390            | BPVO        |
| 357 | CD       | DS03   | 10/6/2016  | SILVER WHEATON CORP      | Sell             | 2,000          | \$25              | \$45,542         | BPVO        |
| 358 | CD       | DS03   | 10/6/2016  | CALL SILVER WHEATON CORP | Buy              | 20             | \$40              | \$2,920          | BPVO        |
| 359 | CD       | DS03   | 10/6/2016  | CALL SILVER WHEATON CORP | Buy              | 20             | \$40              | \$3,140          | BPVO        |
| 360 | SK       | DS01   | 10/7/2016  | TWITTER INC              | Sell             | 1,000          | \$25              | \$19,811         | BPVO        |
| 361 | SK       | DS01   | 10/7/2016  | CALL TWITTER INC         | Buy              | 10             | \$20              | \$20             | BPVO        |
| 362 | CD       | DS03   | 10/7/2016  | OCULAR THERAPEUTIX INC   | Buy              | 2,000          | \$25              | \$13,240         | BPVO        |
| 363 | CD       | DS03   | 10/10/2016 | FIRST MAJESTIC SILVER    | Buy              | 1,000          | \$25              | \$8,229          | BPVO        |
| 364 | RG       | DS03   | 10/11/2016 | HERCULES OFFSHORE INC    | Sell             | 208            | \$20              | \$345            | BPVO        |
| 365 | RG       | DS03   | 10/11/2016 | INTERCLOUD SYS INC NEW   | Buy              | 6,000          | \$25              | \$480            | BPVO        |
| 366 | SK       | DS01   | 10/12/2016 | DONNELLEY R R & SONS     | Buy              | 500            | \$58              | \$10,095         | BPVO        |
| 367 | SK       | DS01   | 10/12/2016 | DONNELLEY R R & SONS     | Buy              | 500            | \$58              | \$10,205         | BPVO        |
| 368 | CD       | DS03   | 10/13/2016 | OCULAR THERAPEUTIX INC   | Buy              | 3,000          | \$25              | \$22,500         | BPVO        |
| 369 | CD       | DS03   | 10/13/2016 | OCULAR THERAPEUTIX INC   | Sell             | 2,000          | \$25              | \$16,000         | BPVO        |
| 370 | CD       | DS03   | 10/13/2016 | CALL OCULAR THERAPEUTIX  | Sell             | 30             | \$60              | \$1,520          | BPVO        |
| 371 | SK       | DS01   | 10/14/2016 | DONNELLEY R R & SONS     | Sell             | 400            | \$26              | \$8,116          | BPVO        |
| 372 | SK       | DS01   | 10/14/2016 | DONNELLEY R R & SONS     | Sell             | 600            | \$65              | \$12,168         | BPVO        |

**Schedule A**

|     | Customer | Rep ID | Trade Date | Security Description     | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|--------------------------|------------------|----------------|-------------------|------------------|-------------|
| 373 | SK       | DS01   | 10/14/2016 | ENERGY SERVICES          | Buy              | 2,000          | \$29              | \$2,600          | BPVO        |
| 374 | RG       | DS03   | 10/18/2016 | PUT SPDR S&P 500 ETF TR  | Buy              | 10             | \$25              | \$310            | BPVO        |
| 375 | CD       | DS03   | 10/18/2016 | CALL SILVER WHEATON CORP | Sell             | 40             | \$80              | \$7,600          | BPVO        |
| 376 | CD       | DS03   | 10/18/2016 | CALL GOLDCORP INC        | Sell             | 30             | \$55              | \$1,650          | BPVO        |
| 377 | SK       | DS01   | 10/19/2016 | DONNELLEY R R & SONS     | Buy              | 1,000          | \$68              | \$19,529         | BPVO        |
| 378 | SK       | DS01   | 10/19/2016 | ENERGY SERVICES          | Buy              | 2,000          | \$65              | \$2,540          | BPVO        |
| 379 | RG       | DS03   | 10/19/2016 | ENERGY SERVICES          | Buy              | 785            | \$20              | \$989            | BPVO        |
| 380 | RG       | DS03   | 10/19/2016 | XTERA COMMUNICATIONS INC | Buy              | 2,500          | \$25              | \$738            | BPVO        |
| 381 | MAG      | DS03   | 10/20/2016 | ENERGY SERVICES          | Buy              | 2,500          | \$65              | \$3,250          | BPVO        |
| 382 | MG       | DS03   | 10/21/2016 | EATON VANCE MUNICIPAL    | Sell             | 1,364          | \$98              | \$17,870         | BPVO        |
| 383 | MG       | DS03   | 10/21/2016 | UNDER ARMOUR INC         | Buy              | 400            | \$88              | \$15,224         | BPVO        |
| 384 | MAG      | DS03   | 10/21/2016 | ENERGY SERVICES          | Buy              | 2,400          | \$62              | \$3,120          | BPVO        |
| 385 | SK       | DS01   | 10/24/2016 | DONNELLEY R R & SONS     | Sell             | 1,000          | \$30              | \$19,060         | BPVO        |
| 386 | SK       | DS01   | 10/24/2016 | CALL OCULAR THERAPEUTIX  | Sell             | 30             | \$85              | \$1,500          | BPVO        |
| 387 | CD       | DS03   | 10/24/2016 | FIRST MINING FINANCE     | Buy              | 10,000         | \$25              | \$5,650          | BPVO        |
| 388 | SK       | DS01   | 10/25/2016 | ENERGY SERVICES          | Buy              | 1,000          | \$30              | \$1,300          | BPVO        |
| 389 | SK       | DS01   | 10/25/2016 | OCULAR THERAPEUTIX INC   | Buy              | 1,500          | \$65              | \$9,779          | BPVO        |
| 390 | MG       | DS03   | 10/25/2016 | UNDER ARMOUR INC         | Buy              | 200            | \$59              | \$6,478          | BPVO        |
| 391 | MG       | DS03   | 10/25/2016 | UNDER ARMOUR INC         | Buy              | 200            | \$59              | \$6,502          | BPVO        |
| 392 | CD       | DS03   | 10/26/2016 | OCULAR THERAPEUTIX INC   | Buy              | 1,000          | \$25              | \$6,620          | BPVO        |
| 393 | CD       | DS03   | 10/27/2016 | FIRST MAJESTIC SILVER    | Buy              | 1,000          | \$25              | \$7,869          | BPVO        |
| 394 | CD       | DS03   | 10/27/2016 | CALL FIRST MAJESTIC      | Sell             | 20             | \$35              | \$1,000          | BPVO        |
| 395 | SK       | DS01   | 10/28/2016 | ENDEAVOUR SILVER CORP    | Buy              | 2,000          | \$65              | \$8,538          | BPVO        |
| 396 | SK       | DS01   | 10/28/2016 | PARNELL PHARMACEUTICALS  | Buy              | 1,200          | \$40              | \$1,379          | BPVO        |
| 397 | CM       | DS01   | 10/28/2016 | CALL GOLDCORP INC        | Buy              | 50             | \$88              | \$850            | BPVO        |
| 398 | RG       | DS03   | 10/28/2016 | PARNELL PHARMACEUTICALS  | Buy              | 600            | \$25              | \$732            | BPVO        |
| 399 | SK       | DS01   | 10/31/2016 | CALL OCULAR THERAPEUTIX  | Sell             | 15             | \$65              | \$1,500          | BPVO        |
| 400 | SK       | DS01   | 11/1/2016  | ENDEAVOUR SILVER CORP    | Sell             | 2,000          | \$65              | \$9,280          | BPVO        |
| 401 | CD       | DS03   | 11/1/2016  | CALL GOLDCORP INC        | Sell             | 50             | \$88              | \$1,600          | BPVO        |
| 402 | SK       | DS01   | 11/2/2016  | FIRST NBC BANK HLDG      | Buy              | 500            | \$50              | \$2,650          | BPVO        |
| 403 | CD       | DS03   | 11/2/2016  | FIRST MAJESTIC SILVER    | Buy              | 1,000          | \$25              | \$9,000          | BPVO        |

**Schedule A**

|     | <b>Customer</b> | <b>Rep ID</b> | <b>Trade Date</b> | <b>Security Description</b> | <b>Purchase or Sale</b> | <b>Trade Quantity</b> | <b>Commission Amount</b> | <b>Principal Amount</b> | <b>Terminal ID</b> |
|-----|-----------------|---------------|-------------------|-----------------------------|-------------------------|-----------------------|--------------------------|-------------------------|--------------------|
| 404 | CD              | DS03          | 11/2/2016         | FIRST MINING FINANCE        | Sell                    | 10,000                | \$25                     | \$6,350                 | BPVO               |
| 405 | CD              | DS03          | 11/2/2016         | CALL FIRST MAJESTIC         | Buy                     | 20                    | \$40                     | \$3,200                 | BPVO               |
| 406 | CD              | DS03          | 11/2/2016         | CALL FIRST MAJESTIC         | Sell                    | 10                    | \$35                     | \$650                   | BPVO               |
| 407 | CD              | DS03          | 11/2/2016         | CALL FIRST MAJESTIC         | Sell                    | 20                    | \$40                     | \$800                   | BPVO               |
| 408 | PM              | DS03          | 11/2/2016         | UNDER ARMOUR INC            | Buy                     | 300                   | \$79                     | \$9,222                 | BPVO               |
| 409 | SK              | DS01          | 11/3/2016         | FIRST NBC BANK HLDG         | Buy                     | 500                   | \$45                     | \$2,698                 | BPVO               |
| 410 | SK              | DS01          | 11/3/2016         | PARNELL PHARMACEUTICALS     | Buy                     | 1,700                 | \$55                     | \$2,055                 | BPVO               |
| 411 | SK              | DS01          | 11/3/2016         | CALL OCULAR THERAPEUTIX     | Buy                     | 20                    | \$30                     | \$200                   | BPVO               |
| 412 | SK              | DS01          | 11/3/2016         | CALL OCULAR THERAPEUTIX     | Buy                     | 10                    | \$25                     | \$100                   | BPVO               |
| 413 | SK              | DS01          | 11/3/2016         | CALL OCULAR THERAPEUTIX     | Sell                    | 10                    | \$23                     | \$800                   | BPVO               |
| 414 | SK              | DS01          | 11/3/2016         | CALL OCULAR THERAPEUTIX     | Sell                    | 10                    | \$35                     | \$750                   | BPVO               |
| 415 | SK              | DS01          | 11/3/2016         | CALL OCULAR THERAPEUTIX     | Sell                    | 10                    | \$70                     | \$670                   | BPVO               |
| 416 | CD              | DS03          | 11/4/2016         | ENDEAVOUR SILVER CORP       | Sell                    | 4,000                 | \$25                     | \$18,964                | BPVO               |
| 417 | CD              | DS03          | 11/4/2016         | FIRST MAJESTIC SILVER       | Buy                     | 2,000                 | \$25                     | \$16,478                | BPVO               |
| 418 | CD              | DS03          | 11/4/2016         | CALL FIRST MAJESTIC         | Sell                    | 20                    | \$39                     | \$600                   | BPVO               |
| 419 | CD              | DS03          | 11/4/2016         | CALL OCULAR THERAPEUTIX     | Sell                    | 60                    | \$100                    | \$600                   | BPVO               |
| 420 | SK              | DS01          | 11/7/2016         | CALAMP CORP                 | Sell                    | 500                   | \$55                     | \$6,516                 | BPVO               |
| 421 | SK              | DS01          | 11/7/2016         | FIRST NBC BANK HLDG         | Sell                    | 1,000                 | \$55                     | \$5,900                 | BPVO               |
| 422 | CD              | DS03          | 11/7/2016         | GOLDCORP INC NEW            | Buy                     | 1,000                 | \$25                     | \$14,570                | BPVO               |
| 423 | CD              | DS03          | 11/8/2016         | ENDEAVOUR SILVER CORP       | Sell                    | 4,000                 | \$25                     | \$18,812                | BPVO               |
| 424 | CD              | DS03          | 11/9/2016         | GOLDCORP INC NEW            | Sell                    | 1,000                 | \$25                     | \$14,985                | BPVO               |
| 425 | CD              | DS03          | 11/9/2016         | SILVER WHEATON CORP         | Buy                     | 1,000                 | \$25                     | \$23,899                | BPVO               |
| 426 | CD              | DS03          | 11/9/2016         | SILVER WHEATON CORP         | Buy                     | 1,000                 | \$25                     | \$23,630                | BPVO               |
| 427 | CD              | DS03          | 11/9/2016         | CALL SILVER WHEATON CORP    | Sell                    | 10                    | \$35                     | \$460                   | BPVO               |
| 428 | CD              | DS03          | 11/9/2016         | CALL SILVER WHEATON CORP    | Sell                    | 10                    | \$25                     | \$410                   | BPVO               |
| 429 | SK              | DS01          | 11/10/2016        | CALAMP CORP                 | Sell                    | 500                   | \$63                     | \$7,012                 | BPVO               |
| 430 | SK              | DS01          | 11/10/2016        | CALAMP CORP                 | Sell                    | 500                   | \$50                     | \$6,955                 | BPVO               |
| 431 | SK              | DS01          | 11/10/2016        | PARNELL PHARMACEUTICALS     | Buy                     | 2,000                 | \$58                     | \$2,479                 | BPVO               |
| 432 | SK              | DS01          | 11/10/2016        | SILVER WHEATON CORP         | Buy                     | 700                   | \$60                     | \$15,190                | BPVO               |
| 433 | SK              | DS01          | 11/10/2016        | CALL SILVER WHEATON CORP    | Sell                    | 7                     | \$30                     | \$364                   | BPVO               |
| 434 | RIG             | DS03          | 11/10/2016        | ENERGY SERVICES             | Buy                     | 1,000                 | \$40                     | \$1,300                 | BPVO               |

**Schedule A**

|     | <b>Customer</b> | <b>Rep ID</b> | <b>Trade Date</b> | <b>Security Description</b> | <b>Purchase or Sale</b> | <b>Trade Quantity</b> | <b>Commission Amount</b> | <b>Principal Amount</b> | <b>Terminal ID</b> |
|-----|-----------------|---------------|-------------------|-----------------------------|-------------------------|-----------------------|--------------------------|-------------------------|--------------------|
| 435 | CD              | DS03          | 11/10/2016        | SILVER WHEATON CORP         | Buy                     | 500                   | \$25                     | \$10,025                | BPVO               |
| 436 | BW              | DS01          | 11/10/2016        | PARNELL PHARMACEUTICALS     | Buy                     | 2,500                 | \$60                     | \$3,123                 | BPVO               |
| 437 | SK              | DS01          | 11/11/2016        | CALAMP CORP                 | Sell                    | 1,000                 | \$68                     | \$14,290                | BPVO               |
| 438 | SG              | DS01          | 11/11/2016        | PARNELL PHARMACEUTICALS     | Buy                     | 4,000                 | \$88                     | \$5,118                 | BPVO               |
| 439 | BW              | DS01          | 11/11/2016        | PARNELL PHARMACEUTICALS     | Buy                     | 2,000                 | \$55                     | \$2,500                 | BPVO               |
| 440 | SR              | DS03          | 11/14/2016        | WILLBROS GROUP INC DE       | Sell                    | 925                   | \$30                     | \$2,038                 | BPVO               |
| 441 | SR              | DS03          | 11/14/2016        | WILLBROS GROUP INC DE       | Sell                    | 1,075                 | \$65                     | \$2,362                 | BPVO               |
| 442 | SR              | DS03          | 11/14/2016        | WILLBROS GROUP INC DE       | Sell                    | 2,000                 | \$65                     | \$4,404                 | BPVO               |
| 443 | SG              | DS01          | 11/14/2016        | PARNELL PHARMACEUTICALS     | Buy                     | 600                   | \$12                     | \$750                   | BPVO               |
| 444 | SG              | DS01          | 11/14/2016        | PARNELL PHARMACEUTICALS     | Buy                     | 3,400                 | \$78                     | \$4,250                 | BPVO               |
| 445 | SK              | DS01          | 11/15/2016        | PARNELL PHARMACEUTICALS     | Buy                     | 2,000                 | \$63                     | \$2,356                 | BPVO               |
| 446 | SK              | DS01          | 11/15/2016        | CALL SILVER WHEATON CORP    | Sell                    | 7                     | \$20                     | \$301                   | BPVO               |
| 447 | SK              | DS01          | 11/15/2016        | CALL SILVER WHEATON CORP    | Buy                     | 7                     | \$20                     | \$35                    | BPVO               |
| 448 | CD              | DS03          | 11/15/2016        | CALL SILVER WHEATON CORP    | Sell                    | 25                    | \$45                     | \$750                   | BPVO               |
| 449 | CD              | DS03          | 11/16/2016        | CALL OCULAR THERAPEUTIX     | Buy                     | 30                    | \$58                     | \$4,800                 | BPVO               |
| 450 | CD              | DS03          | 11/16/2016        | CALL OCULAR THERAPEUTIX     | Sell                    | 30                    | \$58                     | \$1,800                 | BPVO               |
| 451 | RG              | DS03          | 11/16/2016        | XTERA COMMUNICATIONS INC    | Sell                    | 2,500                 | \$10                     | \$175                   | BPVO               |

# Schedule B

**Schedule B**

|    | Customer | Rep ID | Trade Date | Security Description    | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|----|----------|--------|------------|-------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 1  | SK       | DS01   | 06/01/2016 | AMARIN CORP PLC         | Buy                 | 2,500             | \$67                 | \$5,173             | BPAJ           |
| 2  | SK       | DS01   | 06/01/2016 | ENERGY SERVICES         | Sell                | 2,000             | \$67                 | \$2,900             | BPAJ           |
| 3  | SK       | DS01   | 06/02/2016 | AMARIN CORP PLC         | Buy                 | 2,500             | \$68                 | \$5,500             | BPAJ           |
| 4  | SK       | DS01   | 06/02/2016 | CORNING INC             | Sell                | 1,530             | \$97                 | \$32,057            | BPAJ           |
| 5  | SK       | DS01   | 06/02/2016 | ENERGY SERVICES         | Sell                | 456               | \$16                 | \$707               | BPAJ           |
| 6  | SK       | DS01   | 06/02/2016 | ENERGY SERVICES         | Sell                | 1,544             | \$67                 | \$2,316             | BPAJ           |
| 7  | SK       | DS01   | 06/02/2016 | INVENSENSE INC          | Buy                 | 1,000             | \$68                 | \$6,280             | BPAJ           |
| 8  | SK       | DS01   | 06/02/2016 | INVENSENSE INC          | Buy                 | 1,000             | \$68                 | \$6,480             | BPAJ           |
| 9  | CD       | DS03   | 06/03/2016 | BARRICK GOLD CORP       | Sell                | 2,000             | \$25                 | \$37,800            | BPVO           |
| 10 | CD       | DS03   | 06/03/2016 | GOLDCORP INC NEW        | Sell                | 1,000             | \$25                 | \$18,250            | BPVO           |
| 11 | SG       | DS01   | 06/06/2016 | DONNELLEY R R & SONS    | Buy                 | 1,000             | \$75                 | \$16,499            | BPAJ           |
| 12 | SG       | DS01   | 06/06/2016 | DONNELLEY R R & SONS    | Buy                 | 1,000             | \$75                 | \$16,599            | BPAJ           |
| 13 | SK       | DS01   | 06/07/2016 | AMARIN CORP PLC         | Sell                | 5,000             | \$85                 | \$11,600            | BPAJ           |
| 14 | CD       | DS03   | 06/07/2016 | GOLDCORP INC NEW        | Sell                | 2,000             | \$25                 | \$36,060            | BPVO           |
| 15 | SK       | DS01   | 06/08/2016 | CHESAPEAKE GOLD CORP    | Buy                 | 2,500             | \$75                 | \$6,525             | BPAJ           |
| 16 | SK       | DS01   | 06/09/2016 | FLUOR CORP NEW          | Sell                | 504               | \$75                 | \$26,750            | BPAJ           |
| 17 | SK       | DS01   | 06/10/2016 | AMARIN CORP PLC         | Buy                 | 3,000             | \$75                 | \$6,357             | BPAJ           |
| 18 | SK       | DS01   | 06/10/2016 | CHESAPEAKE GOLD CORP    | Sell                | 2,500             | \$75                 | \$7,132             | BPAJ           |
| 19 | JA       | DS03   | 06/13/2016 | WORLDS INC NEW          | Buy                 | 100,000           | \$35                 | \$1,100             | BPAJ           |
| 20 | SK       | DS01   | 06/14/2016 | GOPRO INC               | Buy                 | 1,500             | \$78                 | \$14,475            | BPAJ           |
| 21 | MG       | DS03   | 06/14/2016 | FIRST SOLAR INC         | Buy                 | 200               | \$88                 | \$9,630             | BPAJ           |
| 22 | MG       | DS03   | 06/14/2016 | GOPRO INC               | Buy                 | 1,000             | \$88                 | \$10,040            | BPAJ           |
| 23 | SK       | DS01   | 06/15/2016 | ENERGY SERVICES         | Sell                | 166               | \$5                  | \$257               | BPAJ           |
| 24 | SK       | DS01   | 06/15/2016 | GOPRO INC               | Sell                | 1,500             | \$75                 | \$15,075            | BPAJ           |
| 25 | SK       | DS01   | 06/15/2016 | INVENSENSE INC          | Sell                | 2,000             | \$75                 | \$12,720            | BPAJ           |
| 26 | SK       | DS01   | 06/16/2016 | AMARIN CORP PLC         | Buy                 | 3,000             | \$75                 | \$6,390             | BPAJ           |
| 27 | SK       | DS01   | 06/16/2016 | GOLDCORP INC NEW        | Buy                 | 1,000             | \$75                 | \$17,880            | BPAJ           |
| 28 | CD       | DS03   | 06/16/2016 | GOLDCORP INC NEW        | Buy                 | 2,000             | \$25                 | \$36,180            | BPAJ           |
| 29 | SK       | DS01   | 06/21/2016 | ENERGY SERVICES         | Sell                | 1,834             | \$75                 | \$2,843             | BPAJ           |
| 30 | SK       | DS01   | 06/21/2016 | GOLDCORP INC NEW        | Sell                | 1,000             | \$60                 | \$17,510            | BPAJ           |
| 31 | SK       | DS01   | 06/21/2016 | PARNELL PHARMACEUTICALS | Buy                 | 3,000             | \$68                 | \$4,500             | BPAJ           |
| 32 | CD       | DS03   | 06/21/2016 | BARRICK GOLD CORP       | Buy                 | 1,000             | \$25                 | \$19,350            | BPAJ           |
| 33 | CD       | DS03   | 06/21/2016 | BARRICK GOLD CORP       | Buy                 | 1,000             | \$25                 | \$19,250            | BPAJ           |

**Schedule B**

|    | Customer | Rep ID | Trade Date | Security Description    | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|----|----------|--------|------------|-------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 34 | CD       | DS03   | 06/21/2016 | FIRST MINING FINANCE    | Buy                 | 10,000            | \$25                 | \$5,470             | BPAJ           |
| 35 | SK       | DS01   | 06/22/2016 | AMARIN CORP PLC         | Buy                 | 2,000             | \$65                 | \$4,140             | BPAJ           |
| 36 | SK       | DS01   | 06/23/2016 | PARNELL PHARMACEUTICALS | Buy                 | 3,000             | \$68                 | \$4,755             | BPAJ           |
| 37 | CD       | DS03   | 06/23/2016 | BARRICK GOLD CORP       | Sell                | 2,000             | \$25                 | \$39,100            | BPAJ           |
| 38 | RG       | DS03   | 06/24/2016 | DAKOTA PLAINS HOLDINGS  | Buy                 | 3,000             | \$25                 | \$346               | BPVO           |
| 39 | SK       | DS01   | 06/24/2016 | DELPHI AUTOMOTIVE PLC   | Buy                 | 200               | \$65                 | \$12,516            | BPVO           |
| 40 | SK       | DS01   | 06/24/2016 | MOBILEYE N V            | Buy                 | 200               | \$65                 | \$8,240             | BPVO           |
| 41 | SK       | DS01   | 06/24/2016 | VALLEY NATIONAL BANCORP | Buy                 | 1,500             | \$68                 | \$13,440            | BPVO           |
| 42 | CD       | DS03   | 06/24/2016 | ENDEAVOUR SILVER CORP   | Sell                | 5,000             | \$25                 | \$18,900            | BPVO           |
| 43 | CD       | DS03   | 06/24/2016 | ENDEAVOUR SILVER CORP   | Sell                | 5,000             | \$25                 | \$18,663            | BPVO           |
| 44 | CD       | DS03   | 06/24/2016 | GOLDCORP INC NEW        | Sell                | 2,000             | \$25                 | \$36,840            | BPVO           |
| 45 | CD       | DS03   | 06/24/2016 | GOPRO INC               | Buy                 | 3,000             | \$25                 | \$32,145            | BPVO           |
| 46 | BZ       | DS03   | 06/27/2016 | CHESAPEAKE GOLD CORP    | Sell                | 3,500             | \$75                 | \$14,023            | BPAJ           |
| 47 | BZ       | DS03   | 06/27/2016 | CHESAPEAKE GOLD CORP    | Sell                | 3,500             | \$75                 | \$14,035            | BPAJ           |
| 48 | SK       | DS01   | 06/27/2016 | DELPHI AUTOMOTIVE PLC   | Buy                 | 200               | \$65                 | \$11,766            | BPAJ           |
| 49 | SK       | DS01   | 06/27/2016 | VALLEY NATIONAL BANCORP | Buy                 | 1,500             | \$65                 | \$12,779            | BPAJ           |
| 50 | CD       | DS03   | 06/27/2016 | WILLBROS GROUP INC DE   | Buy                 | 5,000             | \$25                 | \$13,300            | BPVO           |
| 51 | CD       | DS03   | 06/27/2016 | WILLBROS GROUP INC DE   | Buy                 | 5,000             | \$25                 | \$12,600            | BPAJ           |
| 52 | SK       | DS01   | 06/29/2016 | DELPHI AUTOMOTIVE PLC   | Sell                | 200               | \$65                 | \$12,302            | BPAJ           |
| 53 | SK       | DS01   | 06/29/2016 | DELPHI AUTOMOTIVE PLC   | Sell                | 200               | \$50                 | \$12,512            | BPAJ           |
| 54 | SK       | DS01   | 06/29/2016 | VALLEY NATIONAL BANCORP | Sell                | 1,500             | \$65                 | \$13,321            | BPAJ           |
| 55 | SK       | DS01   | 06/29/2016 | VALLEY NATIONAL BANCORP | Sell                | 1,500             | \$60                 | \$13,428            | BPAJ           |
| 56 | SG       | DS01   | 06/29/2016 | MOBILEYE N V            | Buy                 | 400               | \$88                 | \$16,676            | BPAJ           |
| 57 | CD       | DS03   | 06/29/2016 | GOPRO INC               | Sell                | 3,000             | \$25                 | \$32,321            | BPAJ           |
| 58 | PM       | DS03   | 06/29/2016 | ALPHABET INC            | Buy                 | 10                | \$50                 | \$6,829             | BPAJ           |
| 59 | SK       | DS01   | 06/30/2016 | MOBILEYE N V            | Sell                | 200               | \$65                 | \$9,132             | BPAJ           |
| 60 | SK       | DS01   | 07/01/2016 | AMARIN CORP PLC         | Sell                | 4,000             | \$65                 | \$8,650             | BPAJ           |
| 61 | SK       | DS01   | 07/01/2016 | AMARIN CORP PLC         | Sell                | 4,000             | \$65                 | \$8,680             | BPAJ           |
| 62 | SK       | DS01   | 07/01/2016 | PARNELL PHARMACEUTICALS | Sell                | 6,000             | \$65                 | \$9,841             | BPAJ           |
| 63 | CD       | DS03   | 07/01/2016 | ENDEAVOUR SILVER CORP   | Buy                 | 5,000             | \$25                 | \$20,150            | BPVO           |
| 64 | CD       | DS03   | 07/01/2016 | ENDEAVOUR SILVER CORP   | Buy                 | 5,000             | \$25                 | \$20,385            | BPVO           |
| 65 | CD       | DS03   | 07/01/2016 | WILLBROS GROUP INC DE   | Sell                | 100               | \$1                  | \$263               | BPVO           |
| 66 | CD       | DS03   | 07/01/2016 | WILLBROS GROUP INC DE   | Sell                | 4,900             | \$25                 | \$12,691            | BPVO           |

**Schedule B**

|    | Customer | Rep ID | Trade Date | Security Description     | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|----|----------|--------|------------|--------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 67 | CD       | DS03   | 07/01/2016 | WILLBROS GROUP INC DE    | Sell                | 5,000             | \$25                 | \$12,850            | BPVO           |
| 68 | CD       | DS03   | 07/05/2016 | GOLDCORP INC NEW         | Buy                 | 2,000             | \$25                 | \$39,900            | BPAJ           |
| 69 | CD       | DS03   | 07/05/2016 | HECLA MINING COMPANY     | Buy                 | 2,000             | \$25                 | \$11,060            | BPAJ           |
| 70 | CD       | DS03   | 07/05/2016 | CALL ENDEAVOUR SILVER    | Sell                | 100               | \$180                | \$2,000             | BPAJ           |
| 71 | CD       | DS03   | 07/05/2016 | CALL GOLDCORP INC        | Sell                | 20                | \$45                 | \$700               | BPAJ           |
| 72 | SG       | DS01   | 07/06/2016 | CALL GOPRO INC           | Sell                | 20                | \$84                 | \$1,040             | BPVO           |
| 73 | SG       | DS01   | 07/06/2016 | CALL MOBILEYE N V        | Sell                | 4                 | \$83                 | \$1,080             | BPAJ           |
| 74 | CD       | DS03   | 07/06/2016 | POTASH CORP              | Buy                 | 3,000             | \$25                 | \$47,490            | BPAJ           |
| 75 | CD       | DS03   | 07/06/2016 | CALL POTASH CORP         | Sell                | 30                | \$60                 | \$540               | BPAJ           |
| 76 | MAG      | DS03   | 07/07/2016 | CHESAPEAKE GOLD CORP     | Sell                | 1,500             | \$85                 | \$7,050             | BPAJ           |
| 77 | CD       | DS03   | 07/08/2016 | HECLA MINING COMPANY     | Sell                | 2,000             | \$25                 | \$11,480            | BPAJ           |
| 78 | CD       | DS03   | 07/08/2016 | CALL GOLDCORP INC        | Sell                | 20                | \$40                 | \$480               | BPVO           |
| 79 | CD       | DS03   | 07/08/2016 | CALL GOLDCORP INC        | Buy                 | 20                | \$40                 | \$20                | BPVO           |
| 80 | MAG      | DS03   | 07/08/2016 | CHESAPEAKE GOLD CORP     | Sell                | 1,500             | \$85                 | \$7,200             | BPAJ           |
| 81 | CD       | DS03   | 07/11/2016 | COEUR MINING INC         | Buy                 | 3,000             | \$25                 | \$38,550            | BPAJ           |
| 82 | CD       | DS03   | 07/11/2016 | FIRST MINING FINANCE     | Sell                | 10,000            | \$25                 | \$7,158             | BPAJ           |
| 83 | CD       | DS03   | 07/11/2016 | POTASH CORP              | Sell                | 3,000             | \$25                 | \$47,940            | BPAJ           |
| 84 | CD       | DS03   | 07/11/2016 | PUT POWERSHARES QQQ TR   | Buy                 | 20                | \$60                 | \$2,060             | BPAJ           |
| 85 | CD       | DS03   | 07/11/2016 | CALL COEUR D ALENE MINES | Sell                | 30                | \$60                 | \$1,050             | BPAJ           |
| 86 | MAG      | DS03   | 07/11/2016 | CHESAPEAKE GOLD CORP     | Sell                | 1,000             | \$65                 | \$4,450             | BPVO           |
| 87 | MAG      | DS03   | 07/11/2016 | CHESAPEAKE GOLD CORP     | Sell                | 926               | \$60                 | \$4,399             | BPAJ           |
| 88 | SG       | DS01   | 07/12/2016 | DONNELLEY R R & SONS     | Sell                | 2,000             | \$125                | \$39,500            | BPAJ           |
| 89 | MG       | DS03   | 07/12/2016 | CALL GOPRO INC           | Sell                | 5                 | \$40                 | \$450               | BPAJ           |
| 90 | CD       | DS03   | 07/12/2016 | ENDEAVOUR SILVER CORP    | Buy                 | 3,000             | \$25                 | \$14,670            | BPAJ           |
| 91 | MAG      | DS03   | 07/12/2016 | CHESAPEAKE GOLD CORP     | Sell                | 74                | \$25                 | \$344               | BPAJ           |
| 92 | SK       | DS01   | 07/13/2016 | PARNELL PHARMACEUTICALS  | Buy                 | 2,500             | \$65                 | \$3,898             | BPAJ           |
| 93 | RG       | DS03   | 07/14/2016 | PUT SPDR S&P 500 ETF TR  | Buy                 | 10                | \$30                 | \$310               | BPVO           |
| 94 | SK       | DS01   | 07/14/2016 | PARNELL PHARMACEUTICALS  | Buy                 | 600               | \$16                 | \$900               | BPAJ           |
| 95 | SK       | DS01   | 07/14/2016 | PARNELL PHARMACEUTICALS  | Buy                 | 1,900             | \$65                 | \$2,902             | BPVO           |
| 96 | CD       | DS03   | 07/15/2016 | GOPRO INC                | Buy                 | 3,000             | \$25                 | \$35,907            | BPVO           |
| 97 | CD       | DS03   | 07/15/2016 | CALL GOPRO INC           | Sell                | 30                | \$60                 | \$990               | BPAJ           |
| 98 | SK       | DS01   | 07/18/2016 | PROSHARES                | Buy                 | 300               | \$70                 | \$11,516            | BPAJ           |
| 99 | CD       | DS03   | 07/18/2016 | ENDEAVOUR SILVER CORP    | Buy                 | 2,000             | \$25                 | \$9,498             | BPAJ           |

**Schedule B**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|-----|----------|--------|------------|-------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 100 | CD       | DS03   | 07/18/2016 | ENDEAVOUR SILVER CORP   | Buy                 | 2,000             | \$25                 | \$9,438             | BPAJ           |
| 101 | CD       | DS03   | 07/18/2016 | WENDYS COMPANY          | Buy                 | 1,000             | \$25                 | \$9,510             | BPAJ           |
| 102 | CD       | DS03   | 07/19/2016 | GOPRO INC               | Buy                 | 1,000             | \$25                 | \$11,440            | BPAJ           |
| 103 | CD       | DS03   | 07/19/2016 | WENDYS COMPANY          | Sell                | 1,000             | \$25                 | \$9,800             | BPAJ           |
| 104 | SK       | DS01   | 07/20/2016 | CHESAPEAKE GOLD CORP    | Buy                 | 2,000             | \$68                 | \$6,999             | BPAJ           |
| 105 | CD       | DS03   | 07/20/2016 | PUT POWERSHARES QQQ TR  | Buy                 | 20                | \$40                 | \$820               | BPAJ           |
| 106 | CD       | DS03   | 07/20/2016 | CALL GOPRO INC          | Buy                 | 30                | \$55                 | \$90                | BPAJ           |
| 107 | SK       | DS01   | 07/21/2016 | CHESAPEAKE GOLD CORP    | Sell                | 2,000             | \$65                 | \$7,440             | BPVO           |
| 108 | CD       | DS03   | 07/21/2016 | CALL GOPRO INC          | Sell                | 40                | \$80                 | \$1,760             | BPAJ           |
| 109 | SK       | DS01   | 07/22/2016 | PARNELL PHARMACEUTICALS | Buy                 | 2,000             | \$65                 | \$2,960             | BPAJ           |
| 110 | SK       | DS01   | 07/22/2016 | PARNELL PHARMACEUTICALS | Buy                 | 1,000             | \$45                 | \$1,447             | BPVO           |
| 111 | RIG      | DS03   | 07/22/2016 | ENERGY SERVICES         | Buy                 | 1,000             | \$35                 | \$1,520             | BPAJ           |
| 112 | CD       | DS03   | 07/22/2016 | CALL GOLDCORP INC       | Sell                | 20                | \$40                 | \$580               | BPVO           |
| 113 | SK       | DS01   | 07/25/2016 | CALAMP CORP             | Buy                 | 1,000             | \$68                 | \$14,317            | BPAJ           |
| 114 | SG       | DS01   | 07/25/2016 | GOLDCORP INC NEW        | Buy                 | 1,500             | \$88                 | \$26,880            | BPAJ           |
| 115 | SG       | DS01   | 07/25/2016 | CALL GOLDCORP INC       | Sell                | 15                | \$70                 | \$1,125             | BPAJ           |
| 116 | RG       | DS03   | 07/25/2016 | INTERCLOUD SYS INC NEW  | Buy                 | 1,500             | \$25                 | \$825               | BPAJ           |
| 117 | JZ       | DS03   | 07/26/2016 | ALTRIA GROUP INC        | Sell                | 100               | \$50                 | \$6,775             | BPAJ           |
| 118 | JZ       | DS03   | 07/26/2016 | ENERGY SERVICES         | Sell                | 800               | \$25                 | \$1,200             | BPAJ           |
| 119 | SK       | DS01   | 07/26/2016 | CALAMP CORP             | Buy                 | 1,000             | \$75                 | \$14,460            | BPAJ           |
| 120 | SK       | DS01   | 07/26/2016 | PROSHARES               | Sell                | 300               | \$68                 | \$11,495            | BPAJ           |
| 121 | SG       | DS01   | 07/26/2016 | GOLDCORP INC NEW        | Buy                 | 500               | \$75                 | \$9,060             | BPAJ           |
| 122 | JZ       | DS03   | 07/27/2016 | ENERGY SERVICES         | Sell                | 2,000             | \$50                 | \$3,000             | BPAJ           |
| 123 | JZ       | DS03   | 07/27/2016 | ENERGY SERVICES         | Sell                | 2,000             | \$50                 | \$3,000             | BPAJ           |
| 124 | JZ       | DS03   | 07/27/2016 | ENERGY SERVICES         | Sell                | 2,000             | \$50                 | \$3,000             | BPAJ           |
| 125 | JZ       | DS03   | 07/27/2016 | ENERGY SERVICES         | Sell                | 3,746             | \$50                 | \$5,619             | BPAJ           |
| 126 | SK       | DS01   | 07/28/2016 | FOSTER L.B. COMPANY     | Buy                 | 1,000             | \$68                 | \$10,246            | BPAJ           |
| 127 | CD       | DS03   | 07/28/2016 | ENDEAVOUR SILVER CORP   | Sell                | 3,000             | \$25                 | \$14,220            | BPVO           |
| 128 | CD       | DS03   | 07/28/2016 | GOLDCORP INC NEW        | Buy                 | 1,000             | \$25                 | \$17,800            | BPVO           |
| 129 | JZ       | DS03   | 07/29/2016 | ENERGY SERVICES         | Sell                | 29                | \$0                  | \$44                | BPAJ           |
| 130 | CD       | DS03   | 07/29/2016 | CALL GOPRO INC          | Sell                | 20                | \$43                 | \$800               | BPVO           |
| 131 | CD       | DS03   | 07/29/2016 | CALL GOPRO INC          | Buy                 | 20                | \$45                 | \$800               | BPAJ           |
| 132 | SK       | DS01   | 08/01/2016 | CALAMP CORP             | Sell                | 1,000             | \$65                 | \$14,791            | BPAJ           |

**Schedule B**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|-----|----------|--------|------------|-------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 133 | SK       | DS01   | 08/01/2016 | CALAMP CORP             | Sell                | 1,000             | \$65                 | \$14,855            | BPAJ           |
| 134 | SK       | DS01   | 08/01/2016 | FOSTER L.B. COMPANY     | Buy                 | 1,000             | \$65                 | \$10,370            | BPAJ           |
| 135 | SG       | DS01   | 08/01/2016 | CALL FIRST SOLAR INC    | Sell                | 4                 | \$55                 | \$740               | BPAJ           |
| 136 | SK       | DS01   | 08/02/2016 | FOSTER L.B. COMPANY     | Buy                 | 1,000             | \$65                 | \$10,250            | BPAJ           |
| 137 | SK       | DS01   | 08/02/2016 | WILLBROS GROUP INC DE   | Buy                 | 2,500             | \$60                 | \$3,975             | BPAJ           |
| 138 | RIG      | DS03   | 08/02/2016 | ENERGY SERVICES         | Buy                 | 500               | \$35                 | \$755               | BPAJ           |
| 139 | CD       | DS03   | 08/02/2016 | WILLBROS GROUP INC DE   | Buy                 | 3,000             | \$25                 | \$4,669             | BPAJ           |
| 140 | CD       | DS03   | 08/02/2016 | CALL ENDEAVOUR SILVER   | Sell                | 40                | \$75                 | \$1,600             | BPAJ           |
| 141 | SK       | DS01   | 08/03/2016 | FOSTER L.B. COMPANY     | Sell                | 1,000             | \$65                 | \$10,650            | BPAJ           |
| 142 | SK       | DS01   | 08/03/2016 | FOSTER L.B. COMPANY     | Sell                | 1,000             | \$65                 | \$10,619            | BPAJ           |
| 143 | SK       | DS01   | 08/03/2016 | FOSTER L.B. COMPANY     | Sell                | 1,000             | \$65                 | \$10,750            | BPAJ           |
| 144 | SK       | DS01   | 08/03/2016 | PARNELL PHARMACEUTICALS | Sell                | 4,000             | \$65                 | \$6,800             | BPVO           |
| 145 | SK       | DS01   | 08/03/2016 | PARNELL PHARMACEUTICALS | Sell                | 2,000             | \$60                 | \$3,420             | BPAJ           |
| 146 | CD       | DS03   | 08/03/2016 | WILLBROS GROUP INC DE   | Buy                 | 100               | \$1                  | \$155               | BPAJ           |
| 147 | CD       | DS03   | 08/03/2016 | WILLBROS GROUP INC DE   | Buy                 | 2,900             | \$25                 | \$4,582             | BPAJ           |
| 148 | CD       | DS03   | 08/03/2016 | CALL GOLDCORP INC       | Sell                | 30                | \$55                 | \$780               | BPAJ           |
| 149 | SK       | DS01   | 08/04/2016 | PARNELL PHARMACEUTICALS | Sell                | 2,000             | \$60                 | \$3,287             | BPAJ           |
| 150 | SK       | DS01   | 08/04/2016 | WILLBROS GROUP INC DE   | Buy                 | 2,500             | \$65                 | \$4,200             | BPAJ           |
| 151 | CD       | DS03   | 08/05/2016 | GOLDCORP INC NEW        | Buy                 | 1,000             | \$25                 | \$17,490            | BPAJ           |
| 152 | SK       | DS01   | 08/08/2016 | WILLBROS GROUP INC DE   | Sell                | 5,000             | \$85                 | \$9,138             | BPAJ           |
| 153 | SR       | DS03   | 08/08/2016 | KERYX BIOPHARM INC      | Buy                 | 500               | \$68                 | \$2,105             | BPAJ           |
| 154 | CD       | DS03   | 08/08/2016 | DIGITAL ALLY INC NEW    | Buy                 | 2,000             | \$25                 | \$10,391            | BPAJ           |
| 155 | CD       | DS03   | 08/08/2016 | WILLBROS GROUP INC DE   | Sell                | 6,000             | \$25                 | \$10,920            | BPAJ           |
| 156 | SA       | DS01   | 08/08/2016 | ENERGY SERVICES         | Sell                | 1,254             | \$50                 | \$1,881             | BPAJ           |
| 157 | SR       | DS03   | 08/09/2016 | KERYX BIOPHARM INC      | Buy                 | 900               | \$68                 | \$3,824             | BPAJ           |
| 158 | SK       | DS01   | 08/09/2016 | FOSTER L.B. COMPANY     | Buy                 | 1,000             | \$65                 | \$9,792             | BPAJ           |
| 159 | SR       | DS03   | 08/09/2016 | KERYX BIOPHARM INC      | Buy                 | 400               | \$55                 | \$1,700             | BPAJ           |
| 160 | SK       | DS01   | 08/10/2016 | BOJANGLES INC           | Buy                 | 100               | \$7                  | \$1,668             | BPVO           |
| 161 | SK       | DS01   | 08/10/2016 | BOJANGLES INC           | Buy                 | 900               | \$68                 | \$15,030            | BPVO           |
| 162 | SK       | DS01   | 08/10/2016 | FOSTER L.B. COMPANY     | Buy                 | 1,000             | \$68                 | \$9,350             | BPVO           |
| 163 | CD       | DS03   | 08/10/2016 | WILLBROS GROUP INC DE   | Buy                 | 200               | \$2                  | \$360               | BPVO           |
| 164 | SG       | DS01   | 08/11/2016 | FIRST SOLAR INC         | Buy                 | 600               | \$98                 | \$23,514            | BPAJ           |
| 165 | MG       | DS03   | 08/11/2016 | FIRST SOLAR INC         | Buy                 | 400               | \$88                 | \$15,614            | BPAJ           |

**Schedule B**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|-----|----------|--------|------------|-------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 166 | CD       | DS03   | 08/11/2016 | WILLBROS GROUP INC DE   | Buy                 | 6,000             | \$25                 | \$10,740            | BPVO           |
| 167 | CD       | DS03   | 08/11/2016 | CALL GOLDCORP INC       | Sell                | 40                | \$75                 | \$720               | BPVO           |
| 168 | JA       | DS03   | 08/12/2016 | ENERGY SERVICES         | Sell                | 3,000             | \$47                 | \$4,830             | BPVO           |
| 169 | SK       | DS01   | 08/12/2016 | ENERGY SERVICES         | Sell                | 4,000             | \$68                 | \$6,440             | BPVO           |
| 170 | CD       | DS03   | 08/12/2016 | DIGITAL ALLY INC NEW    | Sell                | 2,000             | \$25                 | \$10,460            | BPVO           |
| 171 | CD       | DS03   | 08/12/2016 | WILLBROS GROUP INC DE   | Buy                 | 3,800             | \$25                 | \$6,726             | BPAJ           |
| 172 | SK       | DS01   | 08/15/2016 | BOJANGLES INC           | Sell                | 300               | \$20                 | \$5,151             | BPVO           |
| 173 | SK       | DS01   | 08/15/2016 | BOJANGLES INC           | Sell                | 700               | \$65                 | \$11,998            | BPVO           |
| 174 | SK       | DS01   | 08/15/2016 | FOSTER L.B. COMPANY     | Sell                | 2,000             | \$65                 | \$19,500            | BPVO           |
| 175 | JA       | DS03   | 08/16/2016 | WORLDS INC NEW          | Sell                | 15,000            | \$6                  | \$435               | BPAJ           |
| 176 | SK       | DS01   | 08/16/2016 | OCULAR THERAPEUTIX INC  | Buy                 | 2,000             | \$68                 | \$15,059            | BPAJ           |
| 177 | SK       | DS01   | 08/16/2016 | OCULAR THERAPEUTIX INC  | Buy                 | 1,000             | \$50                 | \$7,509             | BPAJ           |
| 178 | SK       | DS01   | 08/16/2016 | CALL OCULAR THERAPEUTIX | Sell                | 30                | \$88                 | \$2,400             | BPVO           |
| 179 | CD       | DS03   | 08/16/2016 | CALL GOLDCORP INC       | Sell                | 40                | \$75                 | \$960               | BPVO           |
| 180 | JA       | DS03   | 08/17/2016 | WORLDS INC NEW          | Sell                | 117,513           | \$35                 | \$3,290             | BPVO           |
| 181 | CD       | DS03   | 08/18/2016 | WILLBROS GROUP INC DE   | Sell                | 5,000             | \$25                 | \$9,950             | BPVO           |
| 182 | CD       | DS03   | 08/18/2016 | WILLBROS GROUP INC DE   | Sell                | 5,000             | \$25                 | \$9,950             | BPVO           |
| 183 | CD       | DS03   | 08/19/2016 | GOPRO INC               | Buy                 | 4,000             | \$25                 | \$59,756            | BPAJ           |
| 184 | CD       | DS03   | 08/19/2016 | CALL ENDEAVOUR SILVER   | Buy                 | 40                | \$75                 | \$2,400             | BPAJ           |
| 185 | CD       | DS03   | 08/19/2016 | CALL GOPRO INC          | Sell                | 40                | \$80                 | \$1,760             | BPVO           |
| 186 | RG       | DS03   | 08/22/2016 | DAKOTA PLAINS HOLDINGS  | Buy                 | 12,000            | \$25                 | \$324               | BPVO           |
| 187 | SK       | DS01   | 08/22/2016 | BOJANGLES INC           | Buy                 | 1,000             | \$68                 | \$16,529            | BPAJ           |
| 188 | CD       | DS03   | 08/22/2016 | OCULAR THERAPEUTIX INC  | Buy                 | 2,000             | \$25                 | \$13,920            | BPVO           |
| 189 | SK       | DS01   | 08/23/2016 | PARNELL PHARMACEUTICALS | Buy                 | 880               | \$18                 | \$1,382             | BPVO           |
| 190 | SK       | DS01   | 08/23/2016 | PARNELL PHARMACEUTICALS | Buy                 | 2,120             | \$62                 | \$3,434             | BPVO           |
| 191 | SK       | DS01   | 08/24/2016 | BOJANGLES INC           | Sell                | 1,000             | \$45                 | \$16,521            | BPVO           |
| 192 | JLZ      | DS03   | 08/24/2016 | ENERGY SERVICES         | Sell                | 1,188             | \$12                 | \$1,782             | BPVO           |
| 193 | CD       | DS03   | 08/24/2016 | ENDEAVOUR SILVER CORP   | Buy                 | 3,000             | \$25                 | \$14,757            | BPAJ           |
| 194 | CD       | DS03   | 08/24/2016 | OCULAR THERAPEUTIX INC  | Sell                | 2,000             | \$25                 | \$13,900            | BPVO           |
| 195 | SK       | DS01   | 08/25/2016 | PARNELL PHARMACEUTICALS | Buy                 | 3,000             | \$65                 | \$4,800             | BPVO           |
| 196 | SK       | DS01   | 08/25/2016 | PARNELL PHARMACEUTICALS | Buy                 | 2,000             | \$49                 | \$3,100             | BPVO           |
| 197 | JLZ      | DS03   | 08/25/2016 | ENERGY SERVICES         | Sell                | 500               | \$7                  | \$750               | BPVO           |
| 198 | SK       | DS01   | 08/26/2016 | FIRST SOLAR INC         | Buy                 | 500               | \$68                 | \$18,775            | BPVO           |

**Schedule B**

|     | <b>Customer</b> | <b>Rep ID</b> | <b>Trade Date</b> | <b>Security Description</b> | <b>Purchase<br/>or Sale</b> | <b>Trade<br/>Quantity</b> | <b>Commission<br/>Amount</b> | <b>Principal<br/>Amount</b> | <b>Terminal<br/>ID</b> |
|-----|-----------------|---------------|-------------------|-----------------------------|-----------------------------|---------------------------|------------------------------|-----------------------------|------------------------|
| 199 | CD              | DS03          | 08/29/2016        | CALL GOPRO INC              | Sell                        | 40                        | \$78                         | \$1,560                     | BPVO                   |
| 200 | RG              | DS03          | 08/30/2016        | HERCULES OFFSHORE INC       | Sell                        | 500                       | \$25                         | \$700                       | BPVO                   |
| 201 | SK              | DS01          | 08/30/2016        | OCULAR THERAPEUTIX INC      | Buy                         | 1,500                     | \$62                         | \$9,990                     | BPVO                   |
| 202 | JLZ             | DS03          | 08/30/2016        | ENERGY SERVICES             | Sell                        | 1,900                     | \$26                         | \$2,850                     | BPVO                   |

# Schedule C

**Schedule C**

|    | Customer | Rep ID | Trade Date | Security Description   | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|----|----------|--------|------------|------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 1  | CD       | DS03   | 06/03/2016 | BARRICK GOLD CORP      | Sell                | 2,000             | \$25                 | \$37,800            | BPVO           |
| 2  | CD       | DS03   | 06/03/2016 | GOLDCORP INC NEW       | Sell                | 1,000             | \$25                 | \$18,250            | BPVO           |
| 3  | CD       | DS03   | 06/07/2016 | GOLDCORP INC NEW       | Sell                | 2,000             | \$25                 | \$36,060            | BPVO           |
| 4  | JA       | DS03   | 06/13/2016 | WORLDS INC NEW         | Buy                 | 100,000           | \$35                 | \$1,100             | BPAJ           |
| 5  | DR       | DS02   | 06/14/2016 | CHESAPEAKE GOLD CORP   | Buy                 | 1,400             | \$79                 | \$4,325             | BPAJ           |
| 6  | MG       | DS03   | 06/14/2016 | FIRST SOLAR INC        | Buy                 | 200               | \$88                 | \$9,630             | BPAJ           |
| 7  | MG       | DS03   | 06/14/2016 | GOPRO INC              | Buy                 | 1,000             | \$88                 | \$10,040            | BPAJ           |
| 8  | CD       | DS03   | 06/16/2016 | GOLDCORP INC NEW       | Buy                 | 2,000             | \$25                 | \$36,180            | BPAJ           |
| 9  | CD       | DS03   | 06/21/2016 | BARRICK GOLD CORP      | Buy                 | 1,000             | \$25                 | \$19,350            | BPAJ           |
| 10 | CD       | DS03   | 06/21/2016 | BARRICK GOLD CORP      | Buy                 | 1,000             | \$25                 | \$19,250            | BPAJ           |
| 11 | CD       | DS03   | 06/21/2016 | FIRST MINING FINANCE   | Buy                 | 10,000            | \$25                 | \$5,470             | BPAJ           |
| 12 | CD       | DS03   | 06/23/2016 | BARRICK GOLD CORP      | Sell                | 2,000             | \$25                 | \$39,100            | BPAJ           |
| 13 | RG       | DS03   | 06/24/2016 | DAKOTA PLAINS HOLDINGS | Buy                 | 3,000             | \$25                 | \$346               | BPVO           |
| 14 | DR       | DS02   | 06/24/2016 | CHESAPEAKE GOLD CORP   | Sell                | 900               | \$23                 | \$3,537             | BPVO           |
| 15 | DR       | DS02   | 06/24/2016 | CHESAPEAKE GOLD CORP   | Sell                | 1,500             | \$60                 | \$5,835             | BPVO           |
| 16 | DR       | DS02   | 06/24/2016 | CHESAPEAKE GOLD CORP   | Sell                | 2,000             | \$68                 | \$7,781             | BPVO           |
| 17 | DR       | DS02   | 06/24/2016 | CHESAPEAKE GOLD CORP   | Sell                | 1,300             | \$50                 | \$5,096             | BPVO           |
| 18 | CD       | DS03   | 06/24/2016 | ENDEAVOUR SILVER CORP  | Sell                | 5,000             | \$25                 | \$18,900            | BPVO           |
| 19 | CD       | DS03   | 06/24/2016 | ENDEAVOUR SILVER CORP  | Sell                | 5,000             | \$25                 | \$18,663            | BPVO           |
| 20 | CD       | DS03   | 06/24/2016 | GOLDCORP INC NEW       | Sell                | 2,000             | \$25                 | \$36,840            | BPVO           |
| 21 | CD       | DS03   | 06/24/2016 | GOPRO INC              | Buy                 | 3,000             | \$25                 | \$32,145            | BPVO           |
| 22 | BZ       | DS03   | 06/27/2016 | CHESAPEAKE GOLD CORP   | Sell                | 3,500             | \$75                 | \$14,023            | BPAJ           |
| 23 | BZ       | DS03   | 06/27/2016 | CHESAPEAKE GOLD CORP   | Sell                | 3,500             | \$75                 | \$14,035            | BPAJ           |
| 24 | CD       | DS03   | 06/27/2016 | WILLBROS GROUP INC DE  | Buy                 | 5,000             | \$25                 | \$13,300            | BPVO           |
| 25 | CD       | DS03   | 06/27/2016 | WILLBROS GROUP INC DE  | Buy                 | 5,000             | \$25                 | \$12,600            | BPAJ           |
| 26 | CD       | DS03   | 06/29/2016 | GOPRO INC              | Sell                | 3,000             | \$25                 | \$32,321            | BPAJ           |
| 27 | PM       | DS03   | 06/29/2016 | ALPHABET INC           | Buy                 | 10                | \$50                 | \$6,829             | BPAJ           |
| 28 | DR       | DS02   | 06/30/2016 | CHESAPEAKE GOLD CORP   | Sell                | 2,700             | \$75                 | \$11,260            | BPVO           |
| 29 | DR       | DS02   | 06/30/2016 | CHESAPEAKE GOLD CORP   | Sell                | 3,000             | \$75                 | \$12,511            | BPVO           |
| 30 | CD       | DS03   | 07/01/2016 | ENDEAVOUR SILVER CORP  | Buy                 | 5,000             | \$25                 | \$20,150            | BPVO           |
| 31 | CD       | DS03   | 07/01/2016 | ENDEAVOUR SILVER CORP  | Buy                 | 5,000             | \$25                 | \$20,385            | BPVO           |
| 32 | CD       | DS03   | 07/01/2016 | WILLBROS GROUP INC DE  | Sell                | 100               | \$1                  | \$263               | BPVO           |

**Schedule C**

|    | Customer | Rep ID | Trade Date | Security Description     | Purchase<br>or Sale | Trade<br>Quantity | Commission<br>Amount | Principal<br>Amount | Terminal<br>ID |
|----|----------|--------|------------|--------------------------|---------------------|-------------------|----------------------|---------------------|----------------|
| 33 | CD       | DS03   | 07/01/2016 | WILLBROS GROUP INC DE    | Sell                | 4,900             | \$25                 | \$12,691            | BPVO           |
| 34 | CD       | DS03   | 07/01/2016 | WILLBROS GROUP INC DE    | Sell                | 5,000             | \$25                 | \$12,850            | BPVO           |
| 35 | CD       | DS03   | 07/05/2016 | GOLDCORP INC NEW         | Buy                 | 2,000             | \$25                 | \$39,900            | BPAJ           |
| 36 | CD       | DS03   | 07/05/2016 | HECLA MINING COMPANY     | Buy                 | 2,000             | \$25                 | \$11,060            | BPAJ           |
| 37 | CD       | DS03   | 07/05/2016 | CALL ENDEAVOUR SILVER    | Sell                | 100               | \$180                | \$2,000             | BPAJ           |
| 38 | CD       | DS03   | 07/05/2016 | CALL GOLDCORP INC        | Sell                | 20                | \$45                 | \$700               | BPAJ           |
| 39 | SD       | DS02   | 07/06/2016 | CALL GOPRO INC           | Sell                | 40                | \$75                 | \$2,160             | BPVO           |
| 40 | DR       | DS02   | 07/06/2016 | FIRST GUARANTY           | Buy                 | 275               | \$21                 | \$4,400             | BPVO           |
| 41 | CD       | DS03   | 07/06/2016 | POTASH CORP              | Buy                 | 3,000             | \$25                 | \$47,490            | BPAJ           |
| 42 | CD       | DS03   | 07/06/2016 | CALL POTASH CORP         | Sell                | 30                | \$60                 | \$540               | BPAJ           |
| 43 | MAG      | DS03   | 07/07/2016 | CHESAPEAKE GOLD CORP     | Sell                | 1,500             | \$85                 | \$7,050             | BPAJ           |
| 44 | DR       | DS02   | 07/08/2016 | FIRST GUARANTY           | Buy                 | 725               | \$54                 | \$11,600            | BPVO           |
| 45 | CD       | DS03   | 07/08/2016 | HECLA MINING COMPANY     | Sell                | 2,000             | \$25                 | \$11,480            | BPAJ           |
| 46 | CD       | DS03   | 07/08/2016 | CALL GOLDCORP INC        | Sell                | 20                | \$40                 | \$480               | BPVO           |
| 47 | CD       | DS03   | 07/08/2016 | CALL GOLDCORP INC        | Buy                 | 20                | \$40                 | \$20                | BPVO           |
| 48 | MAG      | DS03   | 07/08/2016 | CHESAPEAKE GOLD CORP     | Sell                | 1,500             | \$85                 | \$7,200             | BPAJ           |
| 49 | CD       | DS03   | 07/11/2016 | COEUR MINING INC         | Buy                 | 3,000             | \$25                 | \$38,550            | BPAJ           |
| 50 | CD       | DS03   | 07/11/2016 | FIRST MINING FINANCE     | Sell                | 10,000            | \$25                 | \$7,158             | BPAJ           |
| 51 | CD       | DS03   | 07/11/2016 | POTASH CORP              | Sell                | 3,000             | \$25                 | \$47,940            | BPAJ           |
| 52 | CD       | DS03   | 07/11/2016 | PUT POWERSHARES QQQ TR   | Buy                 | 20                | \$60                 | \$2,060             | BPAJ           |
| 53 | CD       | DS03   | 07/11/2016 | CALL COEUR D ALENE MINES | Sell                | 30                | \$60                 | \$1,050             | BPAJ           |
| 54 | MAG      | DS03   | 07/11/2016 | CHESAPEAKE GOLD CORP     | Sell                | 1,000             | \$65                 | \$4,450             | BPVO           |
| 55 | MAG      | DS03   | 07/11/2016 | CHESAPEAKE GOLD CORP     | Sell                | 926               | \$60                 | \$4,399             | BPAJ           |
| 56 | MG       | DS03   | 07/12/2016 | CALL GOPRO INC           | Sell                | 5                 | \$40                 | \$450               | BPAJ           |
| 57 | CD       | DS03   | 07/12/2016 | ENDEAVOUR SILVER CORP    | Buy                 | 3,000             | \$25                 | \$14,670            | BPAJ           |
| 58 | MAG      | DS03   | 07/12/2016 | CHESAPEAKE GOLD CORP     | Sell                | 74                | \$25                 | \$344               | BPAJ           |
| 59 | RG       | DS03   | 07/14/2016 | PUT SPDR S&P 500 ETF TR  | Buy                 | 10                | \$30                 | \$310               | BPVO           |
| 60 | DR       | DS02   | 07/14/2016 | FIRST GUARANTY           | Buy                 | 1,000             | \$88                 | \$16,250            | BPAJ           |
| 61 | DR       | DS02   | 07/14/2016 | MECHEL PAO               | Sell                | 5,250             | \$85                 | \$9,398             | BPAJ           |
| 62 | CD       | DS03   | 07/15/2016 | GOPRO INC                | Buy                 | 3,000             | \$25                 | \$35,907            | BPVO           |
| 63 | CD       | DS03   | 07/15/2016 | CALL GOPRO INC           | Sell                | 30                | \$60                 | \$990               | BPAJ           |
| 64 | CD       | DS03   | 07/18/2016 | ENDEAVOUR SILVER CORP    | Buy                 | 2,000             | \$25                 | \$9,498             | BPAJ           |

**Schedule C**

|    | <b>Customer</b> | <b>Rep ID</b> | <b>Trade Date</b> | <b>Security Description</b> | <b>Purchase<br/>or Sale</b> | <b>Trade<br/>Quantity</b> | <b>Commission<br/>Amount</b> | <b>Principal<br/>Amount</b> | <b>Terminal<br/>ID</b> |
|----|-----------------|---------------|-------------------|-----------------------------|-----------------------------|---------------------------|------------------------------|-----------------------------|------------------------|
| 65 | CD              | DS03          | 07/18/2016        | ENDEAVOUR SILVER CORP       | Buy                         | 2,000                     | \$25                         | \$9,438                     | BPAJ                   |
| 66 | CD              | DS03          | 07/18/2016        | WENDYS COMPANY              | Buy                         | 1,000                     | \$25                         | \$9,510                     | BPAJ                   |
| 67 | CD              | DS03          | 07/19/2016        | GOPRO INC                   | Buy                         | 1,000                     | \$25                         | \$11,440                    | BPAJ                   |
| 68 | CD              | DS03          | 07/19/2016        | WENDYS COMPANY              | Sell                        | 1,000                     | \$25                         | \$9,800                     | BPAJ                   |
| 69 | CD              | DS03          | 07/20/2016        | PUT POWERSHARES QQQ TR      | Buy                         | 20                        | \$40                         | \$820                       | BPAJ                   |
| 70 | CD              | DS03          | 07/20/2016        | CALL GOPRO INC              | Buy                         | 30                        | \$55                         | \$90                        | BPAJ                   |
| 71 | CD              | DS03          | 07/21/2016        | CALL GOPRO INC              | Sell                        | 40                        | \$80                         | \$1,760                     | BPAJ                   |
| 72 | RIG             | DS03          | 07/22/2016        | ENERGY SERVICES             | Buy                         | 1,000                     | \$35                         | \$1,520                     | BPAJ                   |
| 73 | CD              | DS03          | 07/22/2016        | CALL GOLDCORP INC           | Sell                        | 20                        | \$40                         | \$580                       | BPVO                   |
| 74 | RG              | DS03          | 07/25/2016        | INTERCLOUD SYS INC NEW      | Buy                         | 1,500                     | \$25                         | \$825                       | BPAJ                   |
| 75 | JZ              | DS03          | 07/26/2016        | ALTRIA GROUP INC            | Sell                        | 100                       | \$50                         | \$6,775                     | BPAJ                   |
| 76 | JZ              | DS03          | 07/26/2016        | ENERGY SERVICES             | Sell                        | 800                       | \$25                         | \$1,200                     | BPAJ                   |
| 77 | JZ              | DS03          | 07/27/2016        | ENERGY SERVICES             | Sell                        | 2,000                     | \$50                         | \$3,000                     | BPAJ                   |
| 78 | JZ              | DS03          | 07/27/2016        | ENERGY SERVICES             | Sell                        | 2,000                     | \$50                         | \$3,000                     | BPAJ                   |
| 79 | JZ              | DS03          | 07/27/2016        | ENERGY SERVICES             | Sell                        | 2,000                     | \$50                         | \$3,000                     | BPAJ                   |
| 80 | JZ              | DS03          | 07/27/2016        | ENERGY SERVICES             | Sell                        | 3,746                     | \$50                         | \$5,619                     | BPAJ                   |
| 81 | DR              | DS02          | 07/27/2016        | FOSTER L.B. COMPANY         | Buy                         | 1,000                     | \$79                         | \$11,086                    | BPAJ                   |
| 82 | DR              | DS02          | 07/27/2016        | TWITTER INC                 | Buy                         | 650                       | \$79                         | \$10,774                    | BPAJ                   |
| 83 | CD              | DS03          | 07/28/2016        | ENDEAVOUR SILVER CORP       | Sell                        | 3,000                     | \$25                         | \$14,220                    | BPVO                   |
| 84 | CD              | DS03          | 07/28/2016        | GOLDCORP INC NEW            | Buy                         | 1,000                     | \$25                         | \$17,800                    | BPVO                   |
| 85 | JZ              | DS03          | 07/29/2016        | ENERGY SERVICES             | Sell                        | 29                        | \$0                          | \$44                        | BPAJ                   |
| 86 | CD              | DS03          | 07/29/2016        | CALL GOPRO INC              | Sell                        | 20                        | \$43                         | \$800                       | BPVO                   |
| 87 | CD              | DS03          | 07/29/2016        | CALL GOPRO INC              | Buy                         | 20                        | \$45                         | \$800                       | BPAJ                   |
| 88 | RIG             | DS03          | 08/02/2016        | ENERGY SERVICES             | Buy                         | 500                       | \$35                         | \$755                       | BPAJ                   |
| 89 | CD              | DS03          | 08/02/2016        | WILLBROS GROUP INC DE       | Buy                         | 3,000                     | \$25                         | \$4,669                     | BPAJ                   |
| 90 | CD              | DS03          | 08/02/2016        | CALL ENDEAVOUR SILVER       | Sell                        | 40                        | \$75                         | \$1,600                     | BPAJ                   |
| 91 | CD              | DS03          | 08/03/2016        | WILLBROS GROUP INC DE       | Buy                         | 100                       | \$1                          | \$155                       | BPAJ                   |
| 92 | CD              | DS03          | 08/03/2016        | WILLBROS GROUP INC DE       | Buy                         | 2,900                     | \$25                         | \$4,582                     | BPAJ                   |
| 93 | CD              | DS03          | 08/03/2016        | CALL GOLDCORP INC           | Sell                        | 30                        | \$55                         | \$780                       | BPAJ                   |
| 94 | SD              | DS02          | 08/05/2016        | ENDEAVOUR SILVER CORP       | Buy                         | 10,000                    | \$25                         | \$49,900                    | BPVO                   |
| 95 | SD              | DS02          | 08/05/2016        | GOPRO INC                   | Sell                        | 4,000                     | \$75                         | \$55,680                    | BPVO                   |
| 96 | SD              | DS02          | 08/05/2016        | CALL ENDEAVOUR SILVER       | Sell                        | 100                       | \$160                        | \$2,500                     | BPVO                   |

**Schedule C**

|     | Customer | Rep ID | Trade Date | Security Description    | Purchase or Sale | Trade Quantity | Commission Amount | Principal Amount | Terminal ID |
|-----|----------|--------|------------|-------------------------|------------------|----------------|-------------------|------------------|-------------|
| 97  | SD       | DS02   | 08/05/2016 | CALL GOPRO INC          | Buy              | 40             | \$75              | \$7,880          | BPVO        |
| 98  | CD       | DS03   | 08/05/2016 | GOLDCORP INC NEW        | Buy              | 1,000          | \$25              | \$17,490         | BPAJ        |
| 99  | SR       | DS03   | 08/08/2016 | KERYX BIOPHARM INC      | Buy              | 500            | \$68              | \$2,105          | BPAJ        |
| 100 | CD       | DS03   | 08/08/2016 | DIGITAL ALLY INC NEW    | Buy              | 2,000          | \$25              | \$10,391         | BPAJ        |
| 101 | CD       | DS03   | 08/08/2016 | WILLBROS GROUP INC DE   | Sell             | 6,000          | \$25              | \$10,920         | BPAJ        |
| 102 | SR       | DS03   | 08/09/2016 | KERYX BIOPHARM INC      | Buy              | 900            | \$68              | \$3,824          | BPAJ        |
| 103 | SR       | DS03   | 08/09/2016 | KERYX BIOPHARM INC      | Buy              | 400            | \$55              | \$1,700          | BPAJ        |
| 104 | CD       | DS03   | 08/10/2016 | WILLBROS GROUP INC DE   | Buy              | 200            | \$2               | \$360            | BPVO        |
| 105 | SD       | DS02   | 08/11/2016 | ENERGY SERVICES         | Buy              | 1,000          | \$25              | \$1,450          | BPVO        |
| 106 | MG       | DS03   | 08/11/2016 | FIRST SOLAR INC         | Buy              | 400            | \$88              | \$15,614         | BPAJ        |
| 107 | CD       | DS03   | 08/11/2016 | WILLBROS GROUP INC DE   | Buy              | 6,000          | \$25              | \$10,740         | BPVO        |
| 108 | CD       | DS03   | 08/11/2016 | CALL GOLDCORP INC       | Sell             | 40             | \$75              | \$720            | BPVO        |
| 109 | JA       | DS03   | 08/12/2016 | ENERGY SERVICES         | Sell             | 3,000          | \$47              | \$4,830          | BPVO        |
| 110 | CD       | DS03   | 08/12/2016 | DIGITAL ALLY INC NEW    | Sell             | 2,000          | \$25              | \$10,460         | BPVO        |
| 111 | CD       | DS03   | 08/12/2016 | WILLBROS GROUP INC DE   | Buy              | 3,800          | \$25              | \$6,726          | BPAJ        |
| 112 | JA       | DS03   | 08/16/2016 | WORLDS INC NEW          | Sell             | 15,000         | \$6               | \$435            | BPAJ        |
| 113 | CD       | DS03   | 08/16/2016 | CALL GOLDCORP INC       | Sell             | 40             | \$75              | \$960            | BPVO        |
| 114 | JA       | DS03   | 08/17/2016 | WORLDS INC NEW          | Sell             | 117,513        | \$35              | \$3,290          | BPVO        |
| 115 | SD       | DS02   | 08/17/2016 | ENDEAVOUR SILVER CORP   | Sell             | 8,000          | \$25              | \$44,808         | BPVO        |
| 116 | SD       | DS02   | 08/17/2016 | ENDEAVOUR SILVER CORP   | Sell             | 2,000          | \$25              | \$11,267         | BPVO        |
| 117 | SD       | DS02   | 08/17/2016 | OCULAR THERAPEUTIX INC  | Buy              | 3,000          | \$25              | \$22,440         | BPVO        |
| 118 | SD       | DS02   | 08/17/2016 | CALL ENDEAVOUR SILVER   | Buy              | 100            | \$160             | \$6,000          | BPVO        |
| 119 | SD       | DS02   | 08/18/2016 | OCULAR THERAPEUTIX INC  | Buy              | 2,000          | \$25              | \$14,180         | BPAJ        |
| 120 | CD       | DS03   | 08/18/2016 | WILLBROS GROUP INC DE   | Sell             | 5,000          | \$25              | \$9,950          | BPVO        |
| 121 | CD       | DS03   | 08/18/2016 | WILLBROS GROUP INC DE   | Sell             | 5,000          | \$25              | \$9,950          | BPVO        |
| 122 | SD       | DS02   | 08/19/2016 | CALL OCULAR THERAPEUTIX | Sell             | 50             | \$78              | \$2,500          | BPVO        |
| 123 | CD       | DS03   | 08/19/2016 | GOPRO INC               | Buy              | 4,000          | \$25              | \$59,756         | BPAJ        |
| 124 | CD       | DS03   | 08/19/2016 | CALL ENDEAVOUR SILVER   | Buy              | 40             | \$75              | \$2,400          | BPAJ        |
| 125 | CD       | DS03   | 08/19/2016 | CALL GOPRO INC          | Sell             | 40             | \$80              | \$1,760          | BPVO        |
| 126 | RG       | DS03   | 08/22/2016 | DAKOTA PLAINS HOLDINGS  | Buy              | 12,000         | \$25              | \$324            | BPVO        |
| 127 | CD       | DS03   | 08/22/2016 | OCULAR THERAPEUTIX INC  | Buy              | 2,000          | \$25              | \$13,920         | BPVO        |
| 128 | SD       | DS02   | 08/24/2016 | ENDEAVOUR SILVER CORP   | Buy              | 2,000          | \$25              | \$9,220          | BPVO        |

**Schedule C**

|     | <b>Customer</b> | <b>Rep ID</b> | <b>Trade Date</b> | <b>Security Description</b> | <b>Purchase<br/>or Sale</b> | <b>Trade<br/>Quantity</b> | <b>Commission<br/>Amount</b> | <b>Principal<br/>Amount</b> | <b>Terminal<br/>ID</b> |
|-----|-----------------|---------------|-------------------|-----------------------------|-----------------------------|---------------------------|------------------------------|-----------------------------|------------------------|
| 129 | JLZ             | DS03          | 08/24/2016        | ENERGY SERVICES             | Sell                        | 1,188                     | \$12                         | \$1,782                     | BPVO                   |
| 130 | CD              | DS03          | 08/24/2016        | ENDEAVOUR SILVER CORP       | Buy                         | 3,000                     | \$25                         | \$14,757                    | BPAJ                   |
| 131 | CD              | DS03          | 08/24/2016        | OCULAR THERAPEUTIX INC      | Sell                        | 2,000                     | \$25                         | \$13,900                    | BPVO                   |
| 132 | JLZ             | DS03          | 08/25/2016        | ENERGY SERVICES             | Sell                        | 500                       | \$7                          | \$750                       | BPVO                   |
| 133 | DR              | DS02          | 08/25/2016        | BOJANGLES INC               | Sell                        | 800                       | \$75                         | \$13,152                    | BPVO                   |
| 134 | DR              | DS02          | 08/25/2016        | TWITTER INC                 | Buy                         | 700                       | \$75                         | \$12,830                    | BPVO                   |
| 135 | SD              | DS02          | 08/26/2016        | ENDEAVOUR SILVER CORP       | Sell                        | 2,000                     | \$25                         | \$10,002                    | BPVO                   |
| 136 | CD              | DS03          | 08/29/2016        | CALL GOPRO INC              | Sell                        | 40                        | \$78                         | \$1,560                     | BPVO                   |
| 137 | RG              | DS03          | 08/30/2016        | HERCULES OFFSHORE INC       | Sell                        | 500                       | \$25                         | \$700                       | BPVO                   |
| 138 | JLZ             | DS03          | 08/30/2016        | ENERGY SERVICES             | Sell                        | 1,900                     | \$26                         | \$2,850                     | BPVO                   |

**FINANCIAL INDUSTRY REGULATORY AUTHORITY**  
**OFFICE OF HEARING OFFICERS**

Department of Enforcement.

Complainant,

v.

Bruce Martin Zipper  
(CRD No. 1019731),

and

Dakota Securities International, Inc.  
(CRD No. 132700),

Respondents.

DISCIPLINARY PROCEEDING  
No. 2016047565702

Hearing Officer: TBD

**CERTIFICATE OF SERVICE**

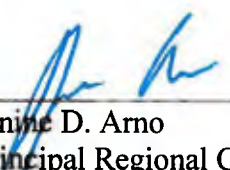
I hereby certify that on this 8<sup>th</sup> day of November, 2017, I caused a copy of the foregoing Notice of Complaint and Complaint to be sent via certified first class mail, return receipt requested and first class mail to:

Bruce Zipper  
7428 S.W. 189 Street  
Miami, FL 33157, receipt no. 9314869904300040420398

And

Dakota Securities International, Inc.  
C/o Elizabeth Dianne Alexander  
7428 S.W. 189 Street  
Miami, FL 33157, receipt no. 9314869904300040420640

And via electronic mail to [bzipper@dakotasi.com](mailto:bzipper@dakotasi.com) and [dalexander@dakotasi.com](mailto:dalexander@dakotasi.com)

  
\_\_\_\_\_  
Janine D. Arno  
Principal Regional Counsel