

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2017052790301**

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

RE: Dawson James Securities, Inc. (Respondent)
Member Firm
CRD No. 130645

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

I.

ACCEPTANCE AND CONSENT

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

BACKGROUND

Dawson James has been a member of FINRA since 2004. The firm currently employs approximately 40 registered representatives working out of three branch office locations. The firm's business includes securities underwriting and retail brokerage. Its principal place of business is Boca Raton, Florida.

Respondent does not have any relevant disciplinary history.

OVERVIEW

During the period June 2015 through April 2020, Dawson James charged customers excessive commissions on 236 transactions. As a result, the firm violated FINRA Rules 2121 and 2101.

FACTS AND VIOLATIVE CONDUCT

This matter originated from FINRA's Department of Member Supervision cycle examination of Dawson James.

FINRA Rule 2121 provides that:

[If a member] acts as agent for his customer ... [the member] shall not charge [its] customer more than a fair commission or service charge, taking into consideration all relevant circumstances[.]

FINRA Rule 2010 requires that “[a] member, in the conduct of its business, shall observe high standards of commercial honor and just and equitable principles of trade.” A violation of FINRA Rule 2121 constitutes a violation of FINRA Rule 2010.

FINRA Rule 2121 Supplementary Material .01 set a guideline of five percent for determining whether a commission is unfair or unreasonable. However, the “5% Policy” is a guide, not a rule. A commission pattern of five percent or even less may be considered unfair or unreasonable.

The percentage of the commission is only one of the factors to be considered in determining fairness. FINRA Rule 2121 Supplementary Material .01 identify seven other factors that members should take into consideration in determining the fairness of a commission, including: (i) the type of security involved; (ii) the availability of the security; (iii) the price of the security; (iv) the size of the transaction; (v) whether the member disclosed the transaction cost to the customer prior to the trade; (vi) any pattern of markups; and (vii) the nature of the member’s business, including the cost of providing services to customers, particularly when they are of a continuing nature.

During the period of June 2015 through April 2020, Dawson James charged commissions on certain transactions in equity securities that were not fair and reasonable, taking into consideration the factors set forth in Rule 2121 Supplementary Material .01, and that exceeded five percent. As a result, on a total of 236 transactions during the relevant period, the firm charged \$7,083.93 in excessive commissions. The commissions charged ranged from approximately five percent to 66 percent of the transactions’ principal value.

By virtue of the foregoing, Dawson James violated FINRA Rules 2121 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

- a censure
- a \$20,000 fine
- Restitution is ordered to be paid to the customers listed on Attachment A to this AWC in the total amount of \$7,083.93, plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2), from trade date until the date this AWC is accepted by the National Adjudicatory Council (NAC).

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

Respondent specifically and voluntarily waives any right to claim an inability to pay, now or at any time after the execution of this AWC, the monetary sanction imposed in this matter.

A registered principal on behalf of Respondent shall submit satisfactory proof of payment of restitution and prejudgment interest (separately specifying the date and amount of each paid to each customer listed on Attachment A) or of reasonable and documented efforts undertaken to effect restitution. Such proof shall be submitted by email to EnforcementNotice@FINRA.org from a work-related account of the registered principal of Respondent. The email must identify Respondent and the case number and include a copy of the check, money order, or other method of payment. This proof shall be provided by email to EnforcementNotice@FINRA.org no later than 120 days after the date of the notice of acceptance of the AWC.

If for any reason Respondent cannot locate any customer identified in Attachment A after reasonable and documented efforts within 120 days after the date of the notice of acceptance of the AWC, or such additional period agreed to by FINRA in writing, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property, or abandoned property fund for the state in which the customer is last known to have resided. Respondent shall provide satisfactory proof of such action to FINRA in the manner described above, within 14 calendar days of forwarding the undistributed restitution and interest to the appropriate state authority.

The imposition of a restitution order or any other monetary sanction in this AWC, and the timing of such ordered payments, does not preclude customers from pursuing their own actions to obtain restitution or other remedies.

Restitution payments to customers shall be preceded or accompanied by a letter, not unacceptable to FINRA, describing the reason for the payment and the fact that the payment is being made pursuant to a settlement with FINRA and as a term of this AWC.

The sanctions imposed in this AWC shall be effective on a date set by FINRA.

II.

WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a complaint issued specifying the allegations against it;
- 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 NAC and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, Respondent specifically and voluntarily waives any right to claim bias or prejudgment of the Chief Legal Officer, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

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

III.

OTHER MATTERS

Respondent understands that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and
- C. If accepted:
 - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
 - 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 its subject matter in accordance with FINRA Rule 8313; and
 - 4. Respondent may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression

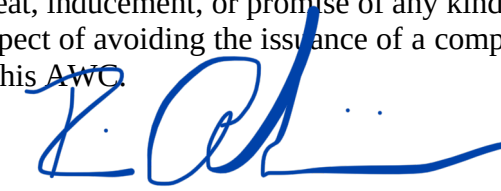
that the AWC is without factual basis. Respondent may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects Respondent's testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

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

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

3/30/21

Date



Dawson James Securities, Inc.

Respondent

Print Name: Richard Aulicino

Title: President

Reviewed by:



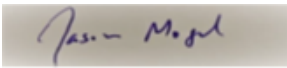
Ralph De Martino
Counsel for Respondent
Schiff Hardin LLP
901 K Street NW, Suite 700
Washington, DC 20001

Accepted by FINRA:

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

04/06/2021

Date



Jason Mogel
Senior Counsel
FINRA
Department of Enforcement
99 High Street, Suite 900
Boston, MA 02110

ATTACHMENT A

Transaction Number	Trade Date	Symbol / Security Description	Quantity	Principal Amount	Restitution (Excluding Interest)
1	6/2/2015	CYDY	2,000	\$1,920.00	\$4.00
2	6/4/2015	OCLS	1,000	\$1,480.00	\$26.00
3	6/8/2015	OCLS	1,000	\$1,670.10	\$16.50
4	6/9/2015	OCLS	1,000	\$1,670.10	\$16.50
5	6/18/2015	VRNG	750	\$458.93	\$77.05
6	6/22/2015	LLTI	10,000	\$900.00	\$55.00
7	6/22/2015	LLTI	10,000	\$800.00	\$60.00
8	6/22/2015	LLTI	10,000	\$700.00	\$65.00
9	6/22/2015	OPGNW	975	\$682.50	\$65.88
10	6/22/2015	LLTI	10,000	\$600.00	\$70.00
11	6/22/2015	LLTI	10,000	\$500.00	\$75.00
12	6/26/2015	CALL SOLAREEDGE TECHS A	10	\$1,050.00	\$47.50
13	6/29/2015	CALL SOLAREEDGE TECHS A	10	\$1,950.00	\$2.50
14	6/30/2015	GBSN	285	\$855.00	\$57.25
15	7/6/2015	CFMS	75	\$1,885.20	\$5.74
16	7/6/2015	CALL SOLAREEDGE TECHS A	9	\$1,530.00	\$23.50
17	7/6/2015	CALL SOLAREEDGE TECHS A	10	\$1,400.00	\$30.00
18	7/7/2015	RIG	125	\$1,940.00	\$3.00
19	7/15/2015	CVM	2,200	\$1,474.88	\$26.26
20	7/15/2015	HERO	4,800	\$978.72	\$51.06
21	7/16/2015	CALL SOLAREEDGE TECHS A	8	\$1,480.00	\$26.00
22	7/16/2015	CALL INTEL CORP	54	\$594.00	\$70.30
23	7/17/2015	OPGNW	2,734	\$1,868.96	\$6.55
24	7/17/2015	CALL SOLAREEDGE TECHS A	10	\$1,800.00	\$10.00
25	7/17/2015	CALL SOLAREEDGE TECHS A	10	\$1,750.00	\$12.50
26	7/20/2015	CALL SOLAREEDGE TECHS A	10	\$1,950.00	\$2.50
27	7/21/2015	CALL SOLAREEDGE TECHS A	10	\$1,300.00	\$35.00
28	7/21/2015	CALL SOLAREEDGE TECHS A	7	\$980.00	\$51.00
29	7/21/2015	CALL SOLAREEDGE TECHS A	7	\$840.00	\$58.00
30	7/22/2015	CLRBW	1,000	\$1,010.00	\$49.50
31	7/23/2015	CVSL	1,000	\$1,340.10	\$33.00
32	7/23/2015	PUT AUTOBYTEL INC NEW	20	\$800.00	\$60.00
33	7/24/2015	CVMWS	10,000	\$1,719.00	\$14.05
34	7/27/2015	CALL ANTHEM INC	5	\$1,800.00	\$10.00
35	7/27/2015	CALL SOLAREEDGE TECHS A	20	\$1,600.00	\$20.00
36	7/30/2015	CALL AGNICO EAGLE MINES	20	\$240.00	\$88.00
37	8/6/2015	CALL SOLAREEDGE TECHS A	10	\$1,100.00	\$45.00
38	8/10/2015	OCLS	1,000	\$1,090.00	\$45.50
39	8/11/2015	DGLY	250	\$1,950.00	\$2.50
40	8/11/2015	VPCOU	100	\$1,016.00	\$49.20
41	8/18/2015	APDNW	1,200	\$1,500.00	\$25.00
42	8/19/2015	CAPN	376	\$904.54	\$54.77

ATTACHMENT A

Transaction Number	Trade Date	Symbol / Security Description	Quantity	Principal Amount	Restitution (Excluding Interest)
43	8/20/2015	CALL ROSS STORES INC	10	\$1,600.00	\$20.00
44	8/24/2015	DGLY	250	\$1,585.00	\$20.75
45	8/25/2015	PULM	400	\$1,871.00	\$6.45
46	8/25/2015	GNL	185	\$1,502.20	\$24.89
47	8/25/2015	ATOS	1,500	\$1,199.10	\$40.05
48	8/25/2015	GBSN	1,000	\$798.70	\$60.07
49	8/25/2015	GBSN	1,080	\$789.37	\$60.53
50	8/27/2015	APP	10,000	\$1,898.00	\$5.10
51	9/1/2015	APP	7,900	\$1,531.02	\$23.45
52	9/1/2015	APP	8,050	\$1,586.66	\$20.67
53	9/2/2015	AMPE	500	\$1,480.00	\$26.00
54	9/2/2015	AMPE	500	\$1,470.00	\$26.50
55	9/3/2015	APP	7,700	\$1,366.16	\$31.69
56	9/11/2015	CALL FIBROGEN INC	10	\$1,500.00	\$25.00
57	9/11/2015	CALL FIBROGEN INC	10	\$1,250.00	\$37.50
58	9/16/2015	CVMWS	4,000	\$988.40	\$50.58
59	9/17/2015	APP	9,000	\$1,529.10	\$23.55
60	9/22/2015	AMPE	400	\$1,632.00	\$18.40
61	9/22/2015	DSS	5,000	\$1,399.50	\$30.03
62	9/23/2015	APP	11,000	\$1,760.00	\$12.00
63	9/24/2015	GBSN	24,404	\$1,927.92	\$3.60
64	9/28/2015	AMPE	500	\$1,535.00	\$23.25
65	10/5/2015	CALL HEWLETT PACKARD	9	\$1,980.00	\$1.00
66	10/5/2015	VRNG	3,900	\$1,381.38	\$30.93
67	10/8/2015	HK	1,600	\$1,520.00	\$24.00
68	10/9/2015	CFMS	70	\$1,404.21	\$29.79
69	10/16/2015	VRNG	2,500	\$1,019.68	\$49.02
70	10/19/2015	CALL FIBROGEN INC	10	\$1,750.00	\$12.50
71	10/21/2015	HK	1,300	\$1,144.00	\$42.80
72	10/28/2015	CALL JUNO THERAPEUTICS	10	\$750.00	\$62.50
73	10/29/2015	CALL GOPRO INC	25	\$850.00	\$57.50
74	11/3/2015	CALL HALLIBURTON CO	10	\$1,050.00	\$47.50
75	11/24/2015	CALL HALLIBURTON CO	10	\$1,410.00	\$29.50
76	12/8/2015	CAPN	1,000	\$1,847.20	\$7.64
77	12/8/2015	NEPH	4,105	\$1,108.35	\$44.58
78	12/10/2015	NEPH	4,105	\$1,038.75	\$48.06
79	12/11/2015	BBEP	1,500	\$1,232.70	\$38.37
80	12/18/2015	CALL ZIOPHARM ONCOLOGY	10	\$1,700.00	\$15.00
81	12/21/2015	PIP	1,000	\$1,579.60	\$21.02
82	12/24/2015	LINE	1,000	\$1,500.00	\$25.00
83	1/6/2016	AMDA	7,500	\$1,096.50	\$45.18
84	1/15/2016	PUT MGM RESORTS INTL	40	\$720.00	\$64.00

ATTACHMENT A

Transaction Number	Trade Date	Symbol / Security Description	Quantity	Principal Amount	Restitution (Excluding Interest)
85	1/21/2016	SKLNU	222	\$1,776.93	\$11.15
86	1/22/2016	DGLY	250	\$1,667.50	\$16.63
87	1/26/2016	DGLY	250	\$1,556.05	\$22.20
88	1/28/2016	LIGA	10,000,000	\$1,000.00	\$50.00
89	2/1/2016	CALL INTREXON CORP	13	\$1,820.00	\$9.00
90	2/1/2016	POT	105	\$1,652.70	\$17.37
91	2/2/2016	VPCO	104,000	\$1,508.00	\$24.60
92	2/2/2016	VPCO	91,000	\$1,192.10	\$40.40
93	2/3/2016	VPCO	144,000	\$1,728.00	\$13.60
94	2/12/2016	CALL VIRNETX HLDG CORP	54	\$1,890.00	\$5.50
95	2/12/2016	YGE	350	\$1,295.00	\$35.25
96	2/17/2016	CALL VIRNETX HLDG CORP	53	\$1,060.00	\$47.00
97	2/17/2016	CALL VIRNETX HLDG CORP	27	\$540.00	\$73.00
98	2/23/2016	CCCL	3,749	\$1,762.03	\$11.90
99	2/24/2016	RIG	218	\$1,720.02	\$14.00
100	2/24/2016	SSYS	97	\$1,718.85	\$14.06
101	2/24/2016	CALL HALLIBURTON CO	10	\$1,080.00	\$46.00
102	2/24/2016	CALL AMERICAN ARLINES	10	\$1,010.00	\$49.50
103	3/2/2016	SKLN	5,555	\$1,888.70	\$5.57
104	3/4/2016	SKLN	5,555	\$1,944.67	\$2.77
105	3/9/2016	SKLN	6,459	\$1,680.63	\$15.97
106	3/24/2016	AMDA	1,031	\$1,536.19	\$23.19
107	3/28/2016	PUT FREEPORT-MCMORAN	20	\$1,460.00	\$27.00
108	3/28/2016	PUT FREEPORT-MCMORAN	20	\$1,460.00	\$27.00
109	3/28/2016	PUT FREEPORT-MCMORAN	20	\$1,420.00	\$29.00
110	3/28/2016	SKLN	7,293	\$1,278.35	\$36.08
111	3/29/2016	AMDA	1,000	\$1,660.00	\$17.00
112	4/1/2016	CTRV	1,450	\$1,660.25	\$16.99
113	4/5/2016	CALL FITBIT INC	20	\$1,300.00	\$35.00
114	4/7/2016	CAPNW	5,507	\$1,652.10	\$17.40
115	4/12/2016	SKLN	7,761	\$1,375.02	\$31.25
116	4/13/2016	CHK	235	\$1,418.08	\$29.10
117	4/13/2016	VALE	216	\$1,183.57	\$40.82
118	4/14/2016	CCCL	2,500	\$1,160.50	\$41.98
119	4/14/2016	CALL INTREXON CORP	4	\$840.00	\$58.00
120	4/21/2016	PUT ALPHABET INC CL C	1	\$1,850.00	\$7.50
121	4/22/2016	CLRBZ	4,000	\$1,440.40	\$27.98
122	4/22/2016	CLRBZ	3,050	\$1,098.00	\$45.10
123	4/29/2016	CALL VIRNETX HLDG CORP	50	\$1,750.00	\$12.50
124	5/3/2016	CALL GENERAL ELECTRIC CO	10	\$1,200.00	\$40.00
125	5/3/2016	CALL VALEANT PHARMS	10	\$1,040.00	\$48.00
126	5/4/2016	H	41	\$1,987.27	\$0.64

ATTACHMENT A

Transaction Number	Trade Date	Symbol / Security Description	Quantity	Principal Amount	Restitution (Excluding Interest)
127	5/13/2016	EXEL	200	\$1,104.00	\$44.80
128	5/23/2016	CLRBZ	1,000	\$1,400.00	\$30.00
129	5/23/2016	CLRBZ	1,000	\$1,350.00	\$32.50
130	5/23/2016	CALL VIRNETX HLDG CORP	20	\$900.00	\$55.00
131	5/24/2016	VHC	400	\$1,908.00	\$4.60
132	6/2/2016	MNKD	1,600	\$1,616.00	\$19.20
133	6/2/2016	MNKD	1,100	\$1,111.00	\$44.45
134	6/3/2016	PTX	4,000	\$1,840.00	\$8.00
135	6/7/2016	IPCI	1,000	\$1,600.00	\$20.00
136	6/7/2016	CALL TRANSOCEAN LTD	15	\$1,125.00	\$43.75
137	6/9/2016	CALL FITBIT INC	20	\$1,300.00	\$35.00
138	6/9/2016	CALL FITBIT INC	15	\$975.00	\$51.25
139	6/10/2016	OCLSW	3,750	\$942.90	\$52.86
140	6/10/2016	OCLSW	3,750	\$919.50	\$54.03
141	7/28/2016	MNKD	1,700	\$1,666.00	\$16.70
142	8/5/2016	CALL FITBIT INC	10	\$820.00	\$59.00
143	8/8/2016	CALL COCA-COLA COMPANY	5	\$1,260.00	\$37.00
144	8/8/2016	CALL ARCHER DANIELS	6	\$1,146.00	\$42.70
145	8/12/2016	SKLN	16,372	\$1,887.17	\$5.64
146	8/12/2016	CALL JC PENNEY CO INC	10	\$600.00	\$70.00
147	8/17/2016	SKLN	18,735	\$1,792.94	\$10.35
148	8/23/2016	CALL FITBIT INC	15	\$1,200.00	\$40.00
149	8/26/2016	XCO	1,500	\$1,800.15	\$9.99
150	8/31/2016	SKLN	4,220	\$952.88	\$52.36
151	9/21/2016	SKLN	6,900	\$1,262.70	\$36.87
152	10/26/2016	MNKD	1,600	\$840.16	\$57.99
153	11/7/2016	CALL BANK AMER CORP	20	\$860.00	\$57.00
154	11/18/2016	DSS	1,250	\$1,062.50	\$46.88
155	11/21/2016	CALL BANK AMER CORP	10	\$940.00	\$53.00
156	11/22/2016	AMDA	1,975	\$1,441.73	\$27.91
157	11/25/2016	AMDA	2,700	\$1,941.03	\$2.95
158	12/13/2016	CALL JC PENNEY CO INC	10	\$610.00	\$69.50
159	12/19/2016	PULM	2,000	\$1,303.07	\$34.85
160	12/29/2016	OTIV	1,635	\$2,702.25	\$4.89
161	1/4/2017	ETRM	1,072	\$1,908.16	\$4.59
162	1/6/2017	CNDT	120	\$1,768.02	\$11.60
163	1/10/2017	CVM	10,000	\$1,487.45	\$25.63
164	2/6/2017	ONCS	1,000	\$1,150.00	\$42.50
165	2/22/2017	NSPRWS	3,636	\$1,487.12	\$25.64
166	3/22/2017	VHC	875	\$1,881.25	\$5.94
167	4/3/2017	TNXP	250	\$1,115.00	\$44.25
168	4/6/2017	CALL FIBROGEN INC	10	\$1,100.00	\$45.00

ATTACHMENT A

Transaction Number	Trade Date	Symbol / Security Description	Quantity	Principal Amount	Restitution (Excluding Interest)
169	4/26/2017	CALL ZIOPHARM ONCOLOGY	18	\$1,965.00	\$1.75
170	4/26/2017	CALL ZIOPHARM ONCOLOGY	15	\$1,650.00	\$17.50
171	4/26/2017	CALL FIAT CHRYSLER	20	\$1,600.00	\$20.00
172	4/26/2017	CALL FIAT CHRYSLER	10	\$850.00	\$57.50
173	5/4/2017	NSPR	2,500	\$1,625.00	\$18.75
174	5/31/2017	CALL TEMPUR PEDIC INTL	4	\$1,680.00	\$16.00
175	6/8/2017	ITUS	1,500	\$1,395.00	\$30.25
176	6/27/2017	CALL FIRST MAJESTIC	20	\$1,900.00	\$5.00
177	6/27/2017	CALL FIRST MAJESTIC	20	\$1,800.00	\$10.00
178	6/29/2017	CALL CRAFT BREWERS	10	\$1,600.00	\$20.00
179	8/3/2017	SNOAW	3,750	\$1,841.25	\$7.94
180	8/3/2017	SIGM	245	\$1,574.13	\$21.29
181	8/9/2017	VLRX	350	\$1,956.50	\$2.18
182	8/15/2017	DSS	838	\$540.32	\$72.98
183	8/16/2017	AMDA	2,900	\$1,014.13	\$49.29
184	8/30/2017	CHK	500	\$1,802.50	\$9.88
185	9/14/2017	ITUS	3,000	\$1,995.30	\$0.23
186	9/14/2017	VLRX	500	\$1,625.25	\$18.74
187	9/14/2017	VLRX	400	\$1,309.00	\$34.55
188	10/6/2017	VHC	250	\$1,900.00	\$5.00
189	10/23/2017	CTXRW	3,169	\$1,647.88	\$17.61
190	11/20/2017	FCAU	100	\$1,753.00	\$12.35
191	12/8/2017	VLRX	380	\$1,501.00	\$24.95
192	12/22/2017	SGLBW	3,631	\$1,488.71	\$25.56
193	12/26/2017	ICLK	200	\$1,904.00	\$4.80
194	1/3/2018	PUT VIACOM INC CLASS B	30	\$1,230.00	\$38.50
195	1/3/2018	PUT BOYD GAMING CORP	30	\$450.00	\$77.50
196	1/4/2018	TEVA	90	\$1,760.39	\$11.98
197	1/4/2018	VLRX	500	\$1,525.00	\$23.75
198	1/4/2018	PUT FREEPORT-MCMORAN	50	\$1,050.00	\$47.50
199	1/19/2018	VLRX	370	\$1,298.70	\$35.07
200	1/24/2018	TEVA	75	\$1,572.74	\$21.36
201	1/31/2018	SKLN	912	\$1,213.42	\$39.33
202	4/20/2018	PUT MGM RESORTS INTL	30	\$1,260.00	\$37.00
203	4/26/2018	DNJR	350	\$1,967.00	\$1.65
204	4/26/2018	DNJR	350	\$1,967.00	\$1.65
205	5/11/2018	PUT SYNEOS HEALTH INC	40	\$1,600.00	\$20.00
206	5/11/2018	SIGM	180	\$1,129.50	\$43.53
207	5/16/2018	HMNY	2,500	\$1,717.00	\$14.15
208	5/30/2018	SGLBW	2,500	\$1,500.00	\$25.00
209	6/13/2018	BFRA	100	\$1,325.00	\$33.75
210	6/15/2018	PUT WHEATON PRECIOUS	40	\$1,000.00	\$50.00

ATTACHMENT A

Transaction Number	Trade Date	Symbol / Security Description	Quantity	Principal Amount	Restitution (Excluding Interest)
211	6/15/2018	PUT RH	20	\$240.00	\$88.00
212	8/1/2018	LSCC	200	\$1,522.00	\$23.90
213	8/20/2018	SOLOW	2,450	\$1,637.30	\$18.14
214	8/20/2018	KOOL	4,560	\$1,155.73	\$42.21
215	8/23/2018	PUT WILLIAMS SONOMA	30	\$1,200.00	\$40.00
216	8/28/2018	TEUM	625	\$1,732.50	\$13.38
217	9/6/2018	PUT BRISTOL MYERS	30	\$150.00	\$92.50
218	10/17/2018	NAOV	400	\$1,692.00	\$15.40
219	10/26/2018	VHC	350	\$1,256.50	\$37.18
220	11/13/2018	CTXR	1,000	\$1,390.00	\$30.50
221	1/9/2019	TALN	49,000	\$1,960.00	\$2.00
222	3/27/2019	IMACW	1,950	\$1,955.00	\$2.25
223	5/8/2019	CALL KOHLS CORP	10	\$1,700.00	\$15.00
224	5/20/2019	CALL WEYERHAEUSER CORP	59	\$1,475.00	\$26.25
225	5/23/2019	CALL CVS HEALTH CORP	16	\$1,872.00	\$6.40
226	6/20/2019	SOLO	1,250	\$3,435.50	\$27.23
227	6/25/2019	CALL QUALCOMM INC	7	\$2,310.00	\$34.50
228	7/30/2019	CALL BOEING COMPANY	7	\$1,750.00	\$12.50
229	8/20/2019	KALTF	45,054	\$1,410.19	\$29.49
230	8/22/2019	PUT APPLE INC	200	\$1,801.00	\$9.95
231	8/27/2019	CALL PROSHARES ULTRA	10	\$1,750.00	\$12.50
232	10/16/2019	CALL MAGELLAN MIDSTREAM	10	\$1,350.00	\$32.50
233	11/5/2019	CALL TRANSOCEAN LTD	70	\$1,750.00	\$12.50
234	12/10/2019	VHC	500	\$1,935.50	\$3.22
235	1/7/2020	CALL QUDIAN INC ADR	50	\$3,250.00	\$12.50
236	2/27/2020	CALL FEDEX CORP	12	\$1,740.00	\$13.00
Total					\$7,083.93