

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2019061442702**

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

RE: Wells Fargo Clearing Services, LLC (Respondent)
Member Firm
CRD No. 19616

Pursuant to FINRA Rule 9216, Respondent Wells Fargo Clearing Services, LLC (WFCS) 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 WFCS alleging violations based on the same factual findings described in this AWC.

I.

ACCEPTANCE AND CONSENT

- A. Respondent accepts and consents to the following findings by FINRA without admitting or denying them:

BACKGROUND

WFCS has been a FINRA member since 1987, is headquartered in St. Louis, Missouri, and engages in a general securities business, among others. WFCS has approximately 19,000 registered representatives working in approximately 5,000 branches.¹

In December 2021, WFCS was censured and ordered to pay restitution of \$3,367,929 plus interest for failing to establish and maintain a supervisory system reasonably designed to supervise representatives' 529 plan share-class recommendations in violation of MSRB Rule G-27.

In December 2021, WFCS was censured and ordered to pay a fine of \$550,000 and restitution of \$2,083,624 plus interest for failing to establish and maintain a supervisory system that was reasonably designed to achieve compliance with FINRA's suitability rule as it pertains to early rollovers of Unit Investment Trusts in violation of NASD Rule 3010, and FINRA Rules 3110 and 2010.

In September 2020, WFCS was censured, ordered to pay a fine of \$625,000 and restitution of \$1,355,499 plus interest for failing to establish, maintain, and enforce a supervisory system, including written supervisory procedures, that was reasonably

¹ For more information about the firm, including prior regulatory events, visit BrokerCheck® at www.finra.org/brokercheck.

designed to achieve compliance with FINRA's suitability rule as it pertains to switches from variable annuities to investment company products in violation of NASD Rule 3010 and FINRA Rules 3110 and 2010.

In February 2020, WFCS, pursuant to an Offer of Settlement with the Securities and Exchange Commission, was censured and ordered to pay, together with an affiliate, a civil penalty of \$35,000,000. WFCS consented to findings that it failed to reasonably supervise certain of its financial advisors' unsuitable recommendations to buy and hold single-inverse exchange traded funds in violation of Section 17(a)(3) of the Securities Act of 1933.

OVERVIEW

From January 2017 to December 2018, WFCS failed to reasonably supervise a former registered representative who recommended to retail customers unsuitable, short-term trading of syndicate preferred stock, closed-end funds (CEFs), and medium-term notes (MTNs).² WFCS failed to reasonably follow-up on identified red flags of the representative's short-term trading of these products.

During the same period, WFCS failed to establish and maintain a reasonable supervisory system to assess whether its registered representatives recommended to retail customers short-term trades of syndicate preferred stocks and CEFs that were unsuitable. At least 40 of the firm's other representatives recommended that WFCS' retail customers purchase syndicate preferred stocks and CEFs and then sell the positions within 180 days, causing the customers to sustain losses on these transactions while the representatives collected concessions and commissions.

Based on the above conduct, WFCS violated FINRA Rules 3110(a) and (b), and 2010.

FACTS AND VIOLATIVE CONDUCT

A. WFCS' Sales of Syndicate Products

During the relevant period, WFCS permitted representatives to recommend that customers purchase syndicate preferred stocks, CEFs, and MTNs. These products are income-generating securities. They typically offer more consistent income payments than common stock, and in the case of preferred stocks and CEFs, higher payments than many bonds. Preferred stock, CEFs, and MTNs are generally purchased for their income features and held long-term.

For each of the products at issue here, WFCS was a member of the selling syndicate. Thus, when WFCS' customers purchased these products, the issuer paid WFCS a sales concession (typically 2% for preferred stock, and between 1% and 2% for CEFs and

² FINRA has barred this representative from associating with any FINRA member firm for failing to respond to a request made pursuant to FINRA Rule 8210 in connection with FINRA's investigation into those recommendations.

MTNs), a portion of which WFCS shared with the representatives.³ In addition, where customers later sold these securities, WFCS typically, but not always, charged customers sales commissions, which WFCS also shared with the representatives.

Trading in syndicate preferred stock, CEFs, and MTNs is subject to potential abuse where representatives make recommendations to customers to purchase the security, collect the sales concession, and then recommend a short-term sale of the security. This practice is particularly concerning if the representative then solicits the customer to purchase a different preferred stock, CEF, or MTN, again receiving a front-end sales concession. Multiple WFCS representatives engaged in repeated short-term buying and selling of these syndicate products.

B. WFCS failed to reasonably supervise a representative who recommended short-term trading of syndicate products to retail customers.

FINRA Rule 3110(a) requires a member firm to establish and maintain a system to supervise the activities of each associated person that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA rules.

The duty to supervise under FINRA Rule 3110(a) also includes the responsibility to reasonably investigate red flags that suggest that misconduct may be occurring and to act upon the results of such investigation.

During the relevant period, WFCS' supervisory obligations included maintaining a supervisory system to supervise the activities of its associated persons reasonably designed to achieve compliance with the suitability rule, FINRA Rule 2111. Prior to June 30, 2020, FINRA Rule 2111 required members and associated persons to have a reasonable basis to believe that a recommended transaction involving a security was suitable for the customer. Where a representative recommended short-term trading in syndicate preferred stock, CEFs, and MTNs, including for the purposes of obtaining selling compensation, these transactions may be unsuitable and may violate Rule 2111.⁴

FINRA Rule 2010 requires FINRA member firms, in the conduct of their business, to observe high standards of commercial honor and just and equitable principles of trade. Conduct that violates FINRA Rules 3110 also violates FINRA Rule 2010.

During the relevant period, WFCS maintained written procedures stating that syndicate products were generally supposed to be held long-term. Specifically, the firm's Syndicate Policy stated that "[s]ecurities purchased through a syndicate offering are generally intended to be long-term holdings and are not intended for short-term trading," and that "Registered Associates must not: Encourage or solicit short-term trading of new issues."

³ Generally, customers could only learn of the sales concession by consulting the prospectus or discussing with the representative.

⁴ FINRA Rule 2111 is still in effect, but as of June 30, 2020, it no longer applies to recommendations to retail customers that are subject to Regulation BI under the Securities Exchange Act of 1934.

During the relevant period, WFCS relied on an electronic system to identify short-term trading in syndicate preferred stock, CEFs, and MTNs. This system generated daily Syndicate Short-Term Hold alerts when there was a liquidation within 90 days of purchase of these types of securities. The system did not generate alerts for liquidations of these securities that occurred more than 90 days after purchase and the firm had no other automated system that identified such liquidations.

During the relevant period, WFCS failed to reasonably supervise a representative who recommended short-term trades in syndicate products to retail customers. Specifically, one representative recommended 118 purchases of syndicate preferred stock and CEFs to his customers, then recommended the customers sell the positions for a loss, even after including income generated from the investments, after holding the positions for a short-term (180 days or less). On multiple occasions, the representative recommended the purchase of another syndicate preferred stock or CEF soon after the sale of the first preferred stock or CEF, earning another sales concession. In four customer accounts, there were seven instances where the representative recommended a sale of one syndicate preferred stock or CEF position for a loss, then recommended the purchase of another syndicate preferred stock or CEF position within two days of the sale, and then recommended the sale of that position for a loss, each time earning a sales concession on the purchase. The representative also recommended 13 purchases of syndicate MTNs to his customers, then recommended the sale of the positions for a loss, even after including income generated from the investments, after holding the positions for a short-term (180 days or less).

Of the 118 short-term sales of preferred stock and CEFs that the representative's customers held for 180 days or less but sold at a loss, 111 positions were held between 91 and 180 days. Accordingly, WFCS' automatic surveillance system did not detect these transactions because it was not designed to generate alerts for liquidations of these securities that occurred more than 90 days after purchase.

When WFCS did flag the representative's short-term trades of syndicate preferred stock, CEFs, and MTNs through electronic and manual reviews, the firm notified the representative of the questionable nature of the trade's suitability yet failed to reasonably follow up and address with the representative these red flags of unsuitable trading. On multiple occasions during the relevant period, the firm detected that the representative was selling MTNs that customers had held short term and experienced losses and discussed its concerns with the representative. Despite these warnings, the representative continued short-term trading in MTNs and the firm took no further action to restrict the representative's trading activity for several additional months. Eventually, after identifying additional red flags, the firm sent the representative an email warning that his short-term transactions were not beneficial to customers, who were "incurring losses on the transactions and are being charged commissions on the opening buys and maximum commissions on the closing sells." After receiving this email, the representative ceased recommending short-term trading in MTNs, but continued to recommend that his customers trade preferred stocks and CEFs on a short term basis, even though his

customers experienced losses. Several months later, WFCS once again flagged the representative's short-term trading pattern as concerning, but the firm took no action to restrain the representative's short-term trading in preferred stocks and CEFs.

Between January 2017 and December 2018, the representative solicited 131 purchases of syndicate preferred stock, CEFs, and MTNs with a holding period of 180 days or less where there was a realized loss on the sale. WFCS earned approximately \$578,023 in selling concessions from the syndicate purchases (collected from the issuer) and approximately \$282,564 in sales commissions from the subsequent sales (collected from the customers).

By failing to reasonably supervise its representative's recommendations of short-term trading of syndicate products, WFCS violated FINRA Rules 3110(a) and 2010.

C. WFCS failed to establish and maintain a supervisory system reasonably designed to achieve compliance with its suitability obligations for syndicate preferred stock and CEFs.

FINRA Rule 3110(b) requires a member firm to establish, maintain, and enforce written procedures to supervise the types of business in which it engages and the activities of its associated persons that are reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA Rules.

During the relevant period, WFCS' procedures stated that syndicate preferred stock and CEFs were generally supposed to be held long-term, and required that the firm review trends of short-term syndicate trading. However, the procedures did not explain what constituted short-term trading or explicitly set forth the duration of an appropriate holding period. WFCS identified liquidations of syndicate preferred stock and CEFs within 90 days of purchase through an automatic alert system, which generated daily Syndicate Short-Term Hold alerts. WFCS performed daily review of these alerts and also used these alerts to create quarterly reports that identified certain representatives with a large number of short-term syndicate trades, a sub-set of which was then selected for follow-up review by the firm's reviewers. Additionally, short-term trading greater than 90 days was not subject to any automated supervisory alert. Even where short-term trades held less than 90 days were flagged by the automatic alert system, the firm did not take reasonable action to follow-up and investigate potentially unsuitable trades.

During the relevant period, firm-wide, at least 40 representatives (other than the representative described in Section B, above) recommended 1,504 syndicated preferred stock and CEF purchases where these positions were then sold with a holding period of 180 days or less where there was a realized loss on the solicited sale even after including income earned on the position. Of these positions, 1,253 positions were held between 91 and 180 days and thus were not detected by the firm's alert system. For these 1,504 positions, WFCS earned approximately \$1,453,948 in selling concessions from the syndicate purchases (collected from the issuer), and approximately \$316,460 in sales commissions from the subsequent sales (collected from the customers).

WFCS conducted a substantial syndicate preferred stock and CEFs business yet did not maintain a supervisory system reasonably designed to ensure that its representatives recommended short-term trading of syndicate preferred stocks and CEFs was suitable, and not, for example, for the purpose of capturing sales concessions and commissions.

By May 2024, WFCS implemented an improved trade review system and written procedures to provide for enhanced supervisory review of short-term trades of syndicate preferred stocks, CEFs, and MTNs.

Therefore, WFCS violated FINRA Rules 3110(a) and (b), and 2010.

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

- a censure;
- a \$400,000 fine;
- restitution of \$599,025.29 plus interest as described below;⁵
- disgorgement of \$2,031,972.10 plus interest as described below.⁶

Respondent agrees to pay the monetary sanctions 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.

Restitution is ordered to be paid to the customers listed on Attachment A to this AWC (Eligible Customers) in the total amount of \$599,025.29, 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 April 14, 2023 until the date this AWC is accepted by the National Adjudicatory Council (NAC).

A registered principal on behalf of Respondent shall submit satisfactory proof of payment of restitution and interest (separately specifying the date and amount of each paid to each Eligible Customer) 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.

⁵ The amount of restitution being paid to customers is equal to the commissions paid by the customers on the subsequent sales of the preferred stock, CEFs, and MTNs, including mark-downs.

⁶ The amount of disgorgement being paid is equal to the concessions received by WFCS for the purchases of the preferred stock, CEFs, and MTNs.

The restitution amount plus interest to be paid to each Eligible Customer shall be treated by the Respondent as the Eligible Customer's property for purposes of state escheatment, unclaimed property, abandoned property, and similar laws. If after reasonable and documented efforts undertaken to effect restitution Respondent is unable to pay all Eligible Customers within 120 days after the date of the notice of acceptance of the AWC, Respondent shall submit to FINRA in the manner described above a list of the unpaid Eligible Customers and a description of Respondent's plan, not unacceptable to FINRA, to comply with the applicable escheatment, unclaimed property, abandoned property, or similar laws for each such Eligible Customer.

The imposition of a restitution order or any other monetary sanctions 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.

Disgorgement of concessions received is ordered to be paid to FINRA in the amount of \$2,031,972.10, plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. § 6621 from April 14, 2023 until the date this AWC is accepted by the NAC.

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 sanctions imposed in this matter.

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 right to take legal or factual

positions in litigation or other legal proceedings in which FINRA is not a party. Nothing in this provision affects Respondent's testimonial obligations in any litigation or other legal proceedings.

- 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.

September 5, 2024

Date

Sol Gindi

Wells Fargo Clearing Services, LLC
Respondent

Print Name: Sol Gindi

Title: President

Reviewed by:

Shea Hicks

Shea Hicks
Counsel for Respondent
Norton Rose Fulbright US LLP
7676 Forsyth Blvd, Suite 2230
St. Louis, MO 63105

Accepted by FINRA:

September 12, 2024

Date

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

Josephine Vella

Josephine M. Vella
Principal Counsel
FINRA
Department of Enforcement
200 Liberty Street, 11th Floor
New York, NY 10281

ATTACHMENT A

SCHEDULE OF RESTITUTION

Customer #	Restitution Amount (Exclusive of Interest)
1	\$145,181.00
2	\$37,657.50
3	\$29,647.35
4	\$24,343.18
5	\$23,500.50
6	\$16,268.33
7	\$13,000.00
8	\$11,260.50
9	\$8,924.00
10	\$8,724.00
11	\$7,879.60
12	\$7,387.80
13	\$6,000.00
14	\$5,716.87
15	\$5,660.43
16	\$5,506.50
17	\$5,422.64
18	\$4,746.48
19	\$4,504.50
20	\$4,444.61
21	\$4,259.99
22	\$4,200.00
23	\$4,060.25
24	\$3,904.35
25	\$3,787.50
26	\$3,753.50
27	\$3,560.20
28	\$3,375.00
29	\$3,296.77
30	\$3,255.00
31	\$3,159.65
32	\$3,065.86
33	\$3,003.00

34	\$2,942.94
35	\$2,915.51
36	\$2,805.50
37	\$2,604.50
38	\$2,402.40
39	\$2,401.60
40	\$2,304.95
41	\$2,303.90
42	\$2,270.63
43	\$2,230.51
44	\$2,045.35
45	\$2,038.34
46	\$2,017.00
47	\$2,001.00
48	\$1,877.00
49	\$1,816.70
50	\$1,812.34
51	\$1,801.00
52	\$1,801.00
53	\$1,794.63
54	\$1,751.88
55	\$1,700.00
56	\$1,626.45
57	\$1,625.00
58	\$1,617.76
59	\$1,602.40
60	\$1,595.00
61	\$1,536.38
62	\$1,536.26
63	\$1,519.47
64	\$1,502.50
65	\$1,482.03
66	\$1,470.00
67	\$1,454.98
68	\$1,413.00
69	\$1,402.80
70	\$1,402.69
71	\$1,382.29

72	\$1,378.03
73	\$1,265.15
74	\$1,261.50
75	\$1,253.00
76	\$1,238.82
77	\$1,238.77
78	\$1,220.81
79	\$1,217.10
80	\$1,207.93
81	\$1,177.50
82	\$1,170.00
83	\$1,140.00
84	\$1,101.15
85	\$1,098.83
86	\$1,079.79
87	\$1,067.13
88	\$1,054.53
89	\$1,045.00
90	\$1,032.92
91	\$1,021.90
92	\$1,003.50
93	\$1,001.50
94	\$1,001.50
95	\$1,001.00
96	\$1,001.00
97	\$1,000.50
98	\$996.05
99	\$953.10
100	\$951.33
101	\$930.53
102	\$914.11
103	\$910.17
104	\$900.90
105	\$885.73
106	\$876.05
107	\$875.00
108	\$855.00
109	\$840.66

110	\$831.20
111	\$821.60
112	\$800.40
113	\$800.00
114	\$800.00
115	\$800.00
116	\$800.00
117	\$800.00
118	\$751.49
119	\$750.60
120	\$740.58
121	\$727.09
122	\$718.00
123	\$704.61
124	\$700.75
125	\$683.10
126	\$681.20
127	\$676.35
128	\$675.80
129	\$668.35
130	\$665.00
131	\$651.10
132	\$650.00
133	\$638.63
134	\$629.15
135	\$625.71
136	\$618.67
137	\$615.42
138	\$603.00
139	\$600.60
140	\$600.30
141	\$591.88
142	\$584.47
143	\$578.32
144	\$569.60
145	\$565.11
146	\$531.07
147	\$525.00

148	\$524.34
149	\$520.65
150	\$506.62
151	\$504.27
152	\$500.98
153	\$500.50
154	\$500.50
155	\$497.90
156	\$480.24
157	\$478.26
158	\$470.62
159	\$450.45
160	\$440.32
161	\$440.22
162	\$436.42
163	\$417.99
164	\$414.62
165	\$406.85
166	\$402.00
167	\$400.50
168	\$400.40
169	\$400.40
170	\$400.30
171	\$400.20
172	\$400.20
173	\$400.00
174	\$400.00
175	\$400.00
176	\$400.00
177	\$400.00
178	\$400.00
179	\$400.00
180	\$400.00
181	\$400.00
182	\$385.41
183	\$380.21
184	\$377.34
185	\$375.25

186	\$374.91
187	\$361.00
188	\$360.60
189	\$353.52
190	\$350.50
191	\$349.55
192	\$330.00
193	\$325.39
194	\$320.32
195	\$312.39
196	\$300.30
197	\$300.30
198	\$300.30
199	\$300.00
200	\$300.00
201	\$300.00
202	\$298.41
203	\$290.02
204	\$280.35
205	\$278.15
206	\$275.48
207	\$275.45
208	\$271.80
209	\$255.95
210	\$251.20
211	\$250.50
212	\$250.00
213	\$250.00
214	\$250.00
215	\$250.00
216	\$250.00
217	\$246.47
218	\$245.75
219	\$240.60
220	\$240.45
221	\$240.12
222	\$228.62
223	\$227.76

224	\$218.69
225	\$210.46
226	\$210.07
227	\$209.16
228	\$201.16
229	\$200.40
230	\$200.20
231	\$200.10
232	\$200.10
233	\$200.10
234	\$200.10
235	\$200.00
236	\$200.00
237	\$184.13
238	\$180.24
239	\$180.12
240	\$180.12
241	\$180.12
242	\$180.09
243	\$167.20
244	\$165.00
245	\$161.55
246	\$160.16
247	\$160.16
248	\$160.16
249	\$155.32
250	\$150.20
251	\$150.00
252	\$150.00
253	\$145.00
254	\$144.72
255	\$140.70
256	\$137.27
257	\$136.90
258	\$131.30
259	\$130.52
260	\$130.13
261	\$130.13

262	\$130.00
263	\$128.16
264	\$126.24
265	\$125.00
266	\$125.00
267	\$125.00
268	\$125.00
269	\$125.00
270	\$125.00
271	\$125.00
272	\$125.00
273	\$125.00
274	\$125.00
275	\$125.00
276	\$125.00
277	\$125.00
278	\$125.00
279	\$125.00
280	\$125.00
281	\$125.00
282	\$125.00
283	\$125.00
284	\$125.00
285	\$122.30
286	\$120.12
287	\$110.22
288	\$110.00
289	\$101.00
290	\$100.30
291	\$100.20
292	\$100.10
293	\$85.11
294	\$75.07
295	\$73.91
296	\$63.09
297	\$62.59
298	\$60.00
299	\$57.75

300	\$56.07
301	\$55.00
302	\$50.00
303	\$46.03
304	\$35.00
305	\$35.00
306	\$35.00
307	\$35.00
308	\$35.00
309	\$35.00
310	\$35.00
311	\$35.00
312	\$35.00
313	\$35.00
314	\$35.00
315	\$35.00
316	\$25.05
317	\$24.89
318	\$24.05
319	\$16.01
320	\$12.01
321	\$5.91
322	\$5.01
323	\$5.01
324	\$3.00
325	\$1.00
326	\$1.00
327	\$1.00