

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2019062531501**

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

RE: Royal Alliance Associates, Inc. (Respondent)
Member Firm
CRD No. 23131

Sagepoint Financial, Inc. (Respondent)
Member Firm
CRD No. 133763

FSC Securities Corporation (Respondent)
Member Firm
CRD No. 7461

Pursuant to FINRA Rule 9216, Respondents Royal Alliance, Sagepoint, and FSC 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 Respondents alleging violations based on the same factual findings described in this AWC.

I.

ACCEPTANCE AND CONSENT

- A. Respondents 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

Respondents are and were subsidiaries of Advisor Group, Inc. at all relevant times.¹

Royal Alliance has been a FINRA member firm since July 1989. Royal Alliance is headquartered in Jersey City, New Jersey. Royal Alliance has approximately 3,600 registered representatives and 1,300 branch offices.

¹ For more information about each firm named in this AWC, including prior regulatory events, visit BrokerCheck® at www.finra.org/brokercheck.

Sagepoint Financial, Inc. has been a FINRA member firm since May 2005. Sagepoint is headquartered in Phoenix, Arizona. Sagepoint has approximately 1,800 registered representatives and 780 branch offices.

FSC Securities Corporation has been a FINRA member firm since August 1977. FSC is headquartered in Atlanta, Georgia. FSC has approximately 1,100 registered representatives and 450 branch offices.

OVERVIEW

From January 1, 2013 through June 30, 2018, Royal Alliance, Sagepoint, and FSC failed to establish and maintain a supervisory system reasonably designed to supervise 529 plan share-class recommendations in violation of MSRB Rule G-27. These three Advisor Group firms shared written supervisory procedures that did not reasonably address the share-class suitability factors specific to 529 plan investments. In addition, the firms' transaction review system was not reasonably designed to identify 529 plan share-class recommendations that were inconsistent with the investment time horizon suggested by the age of the account beneficiary.

The firms voluntarily self-reported potential issues with their supervisory system to FINRA as part of the 529 Plan Share Class Initiative announced in Regulatory Notice 19-04 and proposed a plan to remediate affected customers. Accordingly, the AWC includes a censure for each firm and orders of restitution and estimated interest totaling \$485,441 but no fines.

FACTS AND VIOLATIVE CONDUCT

This matter originated from FINRA's 529 Plan Share Class Initiative, in which FINRA member firms were encouraged to review their supervisory systems and procedures governing 529 plans and self-report potential issues to FINRA.

Background—529 Plans

529 plans are tax-advantaged municipal securities that are designed to encourage saving for the future educational expenses of a designated beneficiary.² 529 plans are sponsored by states, state agencies, or educational institutions. States offer 529 plans directly, through designated broker-dealers, or both.

Shares of 529 plans are sold in different classes with different fee structures.³ One share class (Class A shares) will typically impose a front-end sales charge but charge lower

² 529 plans are named after Section 529 of the Internal Revenue Code (26 U.S.C. § 529), which grants tax-exempt status to qualified tuition programs.

³ A 529 plan is structured as a trust. A customer purchases "units" in the trust. For purposes of this AWC, the terms "unit class" and "share class" are used interchangeably.

annual fees compared to other classes.⁴ Another share class (Class C shares) will typically impose no front-end sales charge but impose higher annual fees than Class A shares. Because of their higher annual fees, Class C shares may be more expensive over extended holding periods and, consequently, Class A shares are frequently the suitable option for accounts with younger beneficiaries and longer investment horizons.⁵

The cost of a Class A share versus a Class C share can be meaningful for an investor. For example, applying the fee structure of one 529 plan commonly sold by Respondents during the relevant period, a customer who initially invested \$10,000 in Class C shares and held those shares for eighteen years would pay approximately \$1,300 more in fees and expenses than if the customer had invested the same amount in Class A shares. Moreover, the total value of the customer's 529 plan account for this period would be worth approximately \$1,500 less than an account that instead was invested in Class A shares.⁶

MSRB Rules Relating to 529 Plan Share-Class Recommendations

Because 529 plans are municipal securities, the sale of 529 plans is governed by the rules of the Municipal Securities Rulemaking Board (MSRB). MSRB Rule G-19 requires a broker, dealer or municipal securities dealer to have a reasonable basis to believe that a recommended transaction involving a municipal security is suitable for the customer, based on the information it obtained through reasonable diligence to ascertain the customer's investment profile. A customer's investment profile includes, among other factors, the customer's investment objectives.

The MSRB has stated that information regarding a 529 plan's designated beneficiary should be treated as information relating to the customer's investment objective for purposes of MSRB Rule G-19. Specifically, the MSRB has stated that information known about the designated beneficiary of a 529 plan generally would be relevant in weighing the investment objectives of the customer.⁷

MSRB Rule G-27(a) requires each broker, dealer, and municipal securities dealer to supervise the conduct of its municipal securities activities to ensure compliance with MSRB rules and federal securities laws. MSRB Rule G-27(b) and (c) require each firm to establish and maintain a system, and to establish, maintain and enforce written supervisory procedures, to supervise its municipal securities activities in a manner that is

⁴ Additionally, some 529 plans reduce front-end sales charges if the aggregate amount invested meets certain thresholds-known as breakpoint discounts. Some 529 plans may also have rights of accumulation, which entitle investors to breakpoint discounts based on aggregated holdings across households or other related investments.

⁵ Class C shares may be suitable for accounts with younger beneficiaries based on the customers' particular facts and circumstances. Additionally, as of January 1, 2018, amendments to the United States tax code permit 529 plan customers to withdraw tax-free up to \$10,000 per beneficiary, per year, for tuition in connection with enrollment or attendance at a public, private, or religious elementary or secondary school.

⁶ This example assumes a 5% annual rate of return for both Class A and Class C shares, no enrollment fees or annual maintenance fees and no share-class auto-conversion feature.

⁷ *Interpretation on Customer Obligations Related to Marketing of 529 College Savings Plans* (Aug. 7, 2006).

reasonably designed to achieve compliance with MSRB rules and the federal securities laws.

Respondents' 529 Plan Business

During the relevant period, these three Advisor Group firms were designated broker-dealers for 30 state-sponsored 529 plans.

Respondents' Supervisory System Regarding 529 Plans

These three Advisor Group firms shared written supervisory procedures that addressed 529 plan recommendations. The procedures identified general suitability factors for 529 plan investments, including fees and expenses.

The firms also shared a transaction review system to supervise 529 plan share-class recommendations. Under the firms' procedures, 529 plan recommendations required supervisory review and approval through the transaction review system. Using this system, supervisors were provided with certain information about the 529 plan transaction and the investment profile for the account in order to approve or reject the transaction.

The transaction review system alerted supervisors to potential suitability issues using predefined rules. For example, the system would generate an alert if the customer was purchasing a 529 plan from another state, which could have tax consequences. If the system generated an alert, the supervisor was required to provide an explanation addressing the alert in order to approve the transaction. If the system did not generate an alert, no explanation was necessary in order to approve the transaction. The firms' surveillance department also used the system to conduct reviews of representatives' activity, including 529 plan transactions. For example, the surveillance department used the system to review for total household Class C share positions exceeding a certain threshold.

Respondents' Supervisory System for 529 Plans Did Not Reasonably Address Share-Class Suitability and Did Not Detect Share-Class Recommendations That Were Inconsistent With The Time Horizon For 529 Plan Investments

These three Advisor Group firms' system for supervising representatives' 529 plan share-class recommendations during the relevant period was not reasonably designed.

The firms' written supervisory procedures for 529 plans did not specifically address the relationship between account beneficiary age, the number of years until funds would be needed to pay qualified higher education expenses, and 529 plan share-class suitability. Instead, they directed representatives to consider the client's investment objectives and associated costs, including "mutual fund load expenses," when making a 529 plan recommendation.

The firms' transaction review system did not include rules to identify 529 plan share-class recommendations that appeared to be inconsistent with the age of the account beneficiary or the account's stated time horizon. For example, the system would not generate an alert for the purchase of 529 plan Class C shares in an account for a one-year-old beneficiary. Because no alert would be generated for that recommendation, no explanation would be required to approve the transaction. In April 2017, the firm improved its transaction review system by adding a rule to detect share-class recommendations that were inconsistent with the stated time horizon for the account. However, the investment profile information that the system could use during the relevant period did not include account beneficiary age data. Accordingly, the system could not detect stated time horizons that appeared to conflict with the age of the account beneficiary or 529 plan share-class recommendations that were inconsistent with the time horizon suggested by the age of the account beneficiary.

As a result, the Advisor Group firms did not reasonably supervise 529 plan share-class recommendations and failed to identify Class C share recommendations that were inconsistent with the share-class recommendations suggested by the age of the account beneficiary. The firms have agreed to pay restitution and estimated interest of \$485,441 to affected customers who incurred excess fees from Class C share purchases.

Therefore, Royal Alliance, Sagepoint, and FSC each violated MSRB Rules G-27(a), (b) and (c).

CREDIT FOR EXTRAORDINARY COOPERATION

In resolving this matter, FINRA has recognized Respondents' extraordinary cooperation through their voluntary participation in the 529 Plan Share Class Initiative. They provided substantial assistance to FINRA by voluntarily: (i) conducting a qualitative review of their supervision of 529 plan share-class recommendations in coordination with each other; (ii) jointly self-reporting, pursuant to the Initiative, areas where their supervision may not have been reasonable; (iii) providing additional information relevant to the firms' assessments of their supervisory systems to assist FINRA in understanding the conduct at issue; (iv) providing information about the corrective actions taken prior to and during the Initiative with respect to the supervisory violations set forth in the AWC, including enhancements to the firms' transaction review system for 529 plan share-class recommendations; and (v) developing plans to identify and remediate affected customers more efficiently than otherwise may have been practicable.

B. Respondents also consent to the imposition of the following sanctions:

1. Royal Alliance consents to the imposition of the following sanctions:

- a censure; and
- restitution of \$224,362.66 plus interest as described below.

2. Sagepoint consents to the imposition of the following sanctions:

- a censure; and
 - restitution of \$63,274.73 plus interest as described below.
3. FSC consents to the imposition of the following sanctions:
- a censure; and
 - restitution of \$125,187.52 plus interest as described below.

Restitution is ordered to be paid to the customers listed on Attachments A - C to this AWC in the total amount of \$412,824.91 plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. § 6621(a)(2). Royal Alliance shall pay restitution to the customers on Attachment A to this AWC in the listed principal amounts plus interest. Sagepoint shall pay restitution to the customers on Attachment B to this AWC in the listed principal amounts plus interest. FSC shall pay restitution to the customers on Attachment C to this AWC in the listed principal amounts plus interest. The interest amounts shall be calculated based on the date that restitution amounts for each respective customer were first incurred until a calculation date, not unacceptable to FINRA staff, reasonably proximate to the actual date of payment.

A registered principal on behalf of each Respondent firm shall submit satisfactory proof of payment of restitution and pre-judgment interest (separately specifying the date and amount of each paid to each customer listed on Attachments A - C) or of reasonable and documented efforts undertaken to effect restitution. Such proof shall be submitted by email to 529Initiative@FINRA.org from a work-related account of the registered principal of each Respondent firm. The email must identify the Respondent and the case number and include adequate documentation demonstrating that payment has been provided. This proof shall be provided by email to 529Initiative@FINRA.org no later than 120 days after acceptance of the AWC.

If for any reason Respondents cannot locate any customer identified in Attachments A - C 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, Respondents shall forward any undistributed restitution and interest to an appropriate escheat account. Respondents shall follow the standard escheatment process, adhering with each state's required time frames based on the state in which a customer is last known to have resided. Respondents 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 account.

Respondents also will identify customers who may incur or may continue to incur excess fees and expenses following acceptance of this AWC as the result of having purchased 529 plan Class C shares instead of Class A shares, where those Class C shares do not automatically convert to A shares under the applicable plan documents ("eligible 529 plan account holders"). Respondents will identify eligible 529 plan account holders,

describe for them the difference in fees associated with Class C shares and Class A shares, along with the impact of those fees over time, and review with eligible 529 plan account holders their share class selection. Respondents will assist any eligible 529 plan account holder who requests that his/her Class C shares be converted to Class A shares, including effecting such conversion at no cost to the account holder where practical. Not later than 120 days after the date of the notice of acceptance of the AWC, or such additional period agreed to by FINRA in writing, Respondents shall certify completion of the steps identified in the preceding paragraph, including that conversion of share classes for any eligible 529 plan account holder who requested conversion occurred at no cost to the account holder where practical.

Upon written request showing good cause, FINRA may extend any of the procedural dates set forth above.

Respondents specifically and voluntarily waive 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.

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 as a result of Respondents' participation in FINRA's 529 Plan Share Class Initiative.

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

II.

WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a complaint issued specifying the allegations against them;
- 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, Respondents 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 its acceptance or rejection.

Respondents 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

Respondents 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 Respondents; and
- C. If accepted:
 - 1. this AWC will become part of Respondents' permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondents;
 - 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. Respondents 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. Respondents 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 Respondents' 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 Respondents' testimonial obligations in any litigation or other legal proceedings.

- D. Respondents may attach a corrective action statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondents understand that they 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 Royal Alliance, certifies that a person duly authorized to act on its behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Royal Alliance 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 the firm to submit this AWC.

10/29/2021

Date

Royal Alliance Associates, Inc.
Respondent

Print Name: Dmitry Goldin 

Title: President & CEO

The undersigned, on behalf of Respondent Sagepoint, certifies that a person duly authorized to act on its behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Sagepoint 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 the firm to submit this AWC.

October 29, 2021

Date

Sagepoint Financial, Inc.
Respondent

Print Name: Desiree Sii 

Title: President and CEO

The undersigned, on behalf of Respondent FSC, certifies that a person duly authorized to act on its behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that FSC 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 the firm to submit this AWC.

October 29, 2021

Date

FSC Securities Corporation
Respondent

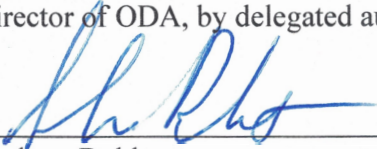
Print Name: Jeffery Sills 

Title: FSC President & CEO

Accepted by FINRA:

12/20/21
Date

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



Andrew Boldt
Senior Counsel
FINRA
Department of Enforcement
55 W. Monroe St., Ste. 2600
Chicago, IL 60603

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	1	\$4,609.44
RAA	2	\$4,566.35
RAA	3	\$3,451.23
RAA	4	\$2,793.27
RAA	5	\$2,454.91
RAA	6	\$2,325.89
RAA	7	\$2,198.88
RAA	8	\$2,267.91
RAA	9	\$2,183.69
RAA	10	\$2,110.14
RAA	11	\$2,065.26
RAA	12	\$1,981.56
RAA	13	\$1,933.77
RAA	14	\$1,911.59
RAA	15	\$1,838.13
RAA	16	\$1,926.51
RAA	17	\$1,843.62
RAA	18	\$1,670.97
RAA	19	\$1,600.65
RAA	20	\$1,582.88
RAA	21	\$1,583.56
RAA	22	\$1,397.98
RAA	23	\$1,481.66
RAA	24	\$1,462.02
RAA	25	\$1,462.02
RAA	26	\$1,444.78
RAA	27	\$1,343.34
RAA	28	\$1,300.80
RAA	29	\$1,328.55
RAA	30	\$1,332.33
RAA	31	\$1,256.18
RAA	32	\$1,246.28
RAA	33	\$1,249.24
RAA	34	\$1,210.56
RAA	35	\$1,092.15
RAA	36	\$1,100.05
RAA	37	\$1,083.78
RAA	38	\$1,054.79
RAA	39	\$1,072.64
RAA	40	\$1,064.31
RAA	41	\$1,069.49
RAA	42	\$981.48
RAA	43	\$1,038.46
RAA	44	\$1,034.65
RAA	45	\$943.87
RAA	46	\$964.49

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	47	\$946.37
RAA	48	\$944.66
RAA	49	\$917.12
RAA	50	\$915.05
RAA	51	\$946.82
RAA	52	\$946.82
RAA	53	\$946.82
RAA	54	\$866.97
RAA	55	\$907.84
RAA	56	\$871.75
RAA	57	\$891.20
RAA	58	\$899.09
RAA	59	\$889.45
RAA	60	\$825.04
RAA	61	\$854.15
RAA	62	\$846.27
RAA	63	\$838.09
RAA	64	\$792.09
RAA	65	\$771.51
RAA	66	\$701.44
RAA	67	\$790.16
RAA	68	\$786.78
RAA	69	\$721.81
RAA	70	\$779.66
RAA	71	\$753.29
RAA	72	\$756.74
RAA	73	\$744.59
RAA	74	\$723.18
RAA	75	\$694.95
RAA	76	\$673.69
RAA	77	\$696.22
RAA	78	\$695.27
RAA	79	\$694.80
RAA	80	\$663.65
RAA	81	\$612.87
RAA	82	\$649.91
RAA	83	\$666.88
RAA	84	\$657.85
RAA	85	\$657.85
RAA	86	\$657.85
RAA	87	\$657.85
RAA	88	\$655.66
RAA	89	\$649.68
RAA	90	\$652.28
RAA	91	\$642.99
RAA	92	\$637.87

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	93	\$644.73
RAA	94	\$638.75
RAA	95	\$630.54
RAA	96	\$570.42
RAA	97	\$615.39
RAA	98	\$565.63
RAA	99	\$565.63
RAA	100	\$605.51
RAA	101	\$603.25
RAA	102	\$544.38
RAA	103	\$547.23
RAA	104	\$520.46
RAA	105	\$562.53
RAA	106	\$536.06
RAA	107	\$536.06
RAA	108	\$522.51
RAA	109	\$519.80
RAA	110	\$517.43
RAA	111	\$498.05
RAA	112	\$540.16
RAA	113	\$515.09
RAA	114	\$524.92
RAA	115	\$489.46
RAA	116	\$457.89
RAA	117	\$483.36
RAA	118	\$487.34
RAA	119	\$496.36
RAA	120	\$473.84
RAA	121	\$473.84
RAA	122	\$492.54
RAA	123	\$469.38
RAA	124	\$475.99
RAA	125	\$474.02
RAA	126	\$457.40
RAA	127	\$476.56
RAA	128	\$455.92
RAA	129	\$469.36
RAA	130	\$431.56
RAA	131	\$462.86
RAA	132	\$459.12
RAA	133	\$437.96
RAA	134	\$434.58
RAA	135	\$400.48
RAA	136	\$387.59
RAA	137	\$413.73
RAA	138	\$430.48

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	139	\$393.89
RAA	140	\$424.36
RAA	141	\$418.63
RAA	142	\$407.15
RAA	143	\$399.90
RAA	144	\$404.93
RAA	145	\$393.06
RAA	146	\$389.34
RAA	147	\$388.36
RAA	148	\$401.48
RAA	149	\$398.17
RAA	150	\$381.03
RAA	151	\$381.03
RAA	152	\$375.55
RAA	153	\$375.40
RAA	154	\$372.56
RAA	155	\$371.88
RAA	156	\$371.25
RAA	157	\$370.19
RAA	158	\$380.99
RAA	159	\$360.22
RAA	160	\$357.95
RAA	161	\$357.70
RAA	162	\$357.29
RAA	163	\$357.29
RAA	164	\$343.76
RAA	165	\$353.99
RAA	166	\$350.05
RAA	167	\$336.34
RAA	168	\$336.10
RAA	169	\$335.94
RAA	170	\$357.03
RAA	171	\$349.34
RAA	172	\$335.18
RAA	173	\$353.85
RAA	174	\$324.54
RAA	175	\$351.82
RAA	176	\$350.43
RAA	177	\$339.53
RAA	178	\$327.40
RAA	179	\$344.45
RAA	180	\$344.18
RAA	181	\$344.18
RAA	182	\$326.20
RAA	183	\$338.65
RAA	184	\$338.02

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	185	\$317.42
RAA	186	\$331.76
RAA	187	\$295.06
RAA	188	\$309.83
RAA	189	\$309.76
RAA	190	\$308.76
RAA	191	\$288.92
RAA	192	\$318.45
RAA	193	\$320.27
RAA	194	\$294.29
RAA	195	\$318.79
RAA	196	\$315.32
RAA	197	\$312.31
RAA	198	\$292.38
RAA	199	\$304.70
RAA	200	\$301.50
RAA	201	\$295.81
RAA	202	\$288.25
RAA	203	\$287.34
RAA	204	\$296.90
RAA	205	\$282.51
RAA	206	\$294.81
RAA	207	\$294.65
RAA	208	\$294.65
RAA	209	\$293.96
RAA	210	\$289.68
RAA	211	\$292.55
RAA	212	\$267.94
RAA	213	\$276.20
RAA	214	\$287.59
RAA	215	\$271.44
RAA	216	\$285.80
RAA	217	\$272.63
RAA	218	\$272.63
RAA	219	\$272.24
RAA	220	\$272.24
RAA	221	\$272.13
RAA	222	\$271.99
RAA	223	\$281.69
RAA	224	\$268.61
RAA	225	\$264.66
RAA	226	\$262.45
RAA	227	\$259.93
RAA	228	\$259.22
RAA	229	\$265.57
RAA	230	\$263.01

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	231	\$259.88
RAA	232	\$250.43
RAA	233	\$238.11
RAA	234	\$237.54
RAA	235	\$245.96
RAA	236	\$245.77
RAA	237	\$255.35
RAA	238	\$244.27
RAA	239	\$244.14
RAA	240	\$232.03
RAA	241	\$239.94
RAA	242	\$240.29
RAA	243	\$224.02
RAA	244	\$239.11
RAA	245	\$243.91
RAA	246	\$235.65
RAA	247	\$235.30
RAA	248	\$235.76
RAA	249	\$224.61
RAA	250	\$241.35
RAA	251	\$222.96
RAA	252	\$219.91
RAA	253	\$230.86
RAA	254	\$227.06
RAA	255	\$230.55
RAA	256	\$232.63
RAA	257	\$229.99
RAA	258	\$229.99
RAA	259	\$229.90
RAA	260	\$229.90
RAA	261	\$209.76
RAA	262	\$209.76
RAA	263	\$221.76
RAA	264	\$227.39
RAA	265	\$222.64
RAA	266	\$208.43
RAA	267	\$213.97
RAA	268	\$213.21
RAA	269	\$197.11
RAA	270	\$199.19
RAA	271	\$199.19
RAA	272	\$199.17
RAA	273	\$215.91
RAA	274	\$200.50
RAA	275	\$200.50
RAA	276	\$199.44

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	277	\$197.82
RAA	278	\$214.34
RAA	279	\$204.71
RAA	280	\$189.57
RAA	281	\$189.57
RAA	282	\$202.56
RAA	283	\$191.78
RAA	284	\$205.78
RAA	285	\$206.16
RAA	286	\$191.37
RAA	287	\$196.53
RAA	288	\$203.32
RAA	289	\$191.46
RAA	290	\$183.61
RAA	291	\$189.01
RAA	292	\$188.97
RAA	293	\$197.43
RAA	294	\$197.25
RAA	295	\$181.74
RAA	296	\$193.46
RAA	297	\$186.63
RAA	298	\$186.63
RAA	299	\$178.45
RAA	300	\$188.71
RAA	301	\$192.40
RAA	302	\$187.67
RAA	303	\$181.90
RAA	304	\$175.87
RAA	305	\$181.32
RAA	306	\$187.24
RAA	307	\$174.02
RAA	308	\$188.58
RAA	309	\$188.58
RAA	310	\$188.58
RAA	311	\$178.69
RAA	312	\$178.69
RAA	313	\$182.60
RAA	314	\$185.23
RAA	315	\$183.13
RAA	316	\$185.22
RAA	317	\$184.92
RAA	318	\$176.36
RAA	319	\$176.34
RAA	320	\$184.26
RAA	321	\$169.59
RAA	322	\$175.60

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	323	\$183.28
RAA	324	\$174.09
RAA	325	\$179.29
RAA	326	\$180.79
RAA	327	\$180.79
RAA	328	\$176.69
RAA	329	\$173.47
RAA	330	\$166.10
RAA	331	\$173.32
RAA	332	\$165.25
RAA	333	\$170.92
RAA	334	\$174.17
RAA	335	\$173.99
RAA	336	\$173.99
RAA	337	\$157.15
RAA	338	\$165.22
RAA	339	\$165.19
RAA	340	\$165.17
RAA	341	\$165.14
RAA	342	\$164.05
RAA	343	\$171.64
RAA	344	\$153.69
RAA	345	\$156.39
RAA	346	\$167.92
RAA	347	\$159.96
RAA	348	\$166.81
RAA	349	\$165.66
RAA	350	\$161.36
RAA	351	\$147.27
RAA	352	\$158.86
RAA	353	\$161.06
RAA	354	\$149.05
RAA	355	\$159.36
RAA	356	\$158.49
RAA	357	\$154.52
RAA	358	\$158.18
RAA	359	\$145.36
RAA	360	\$142.35
RAA	361	\$156.56
RAA	362	\$155.32
RAA	363	\$154.07
RAA	364	\$149.99
RAA	365	\$153.05
RAA	366	\$153.02
RAA	367	\$145.78
RAA	368	\$152.27

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	369	\$152.08
RAA	370	\$151.70
RAA	371	\$144.53
RAA	372	\$144.25
RAA	373	\$150.40
RAA	374	\$150.40
RAA	375	\$143.76
RAA	376	\$143.26
RAA	377	\$149.80
RAA	378	\$141.68
RAA	379	\$142.79
RAA	380	\$141.14
RAA	381	\$144.97
RAA	382	\$146.48
RAA	383	\$133.38
RAA	384	\$141.08
RAA	385	\$140.57
RAA	386	\$140.57
RAA	387	\$140.18
RAA	388	\$137.14
RAA	389	\$140.59
RAA	390	\$129.47
RAA	391	\$140.00
RAA	392	\$139.65
RAA	393	\$139.63
RAA	394	\$138.12
RAA	395	\$126.87
RAA	396	\$126.47
RAA	397	\$126.15
RAA	398	\$136.12
RAA	399	\$136.12
RAA	400	\$125.28
RAA	401	\$124.79
RAA	402	\$135.31
RAA	403	\$132.98
RAA	404	\$134.42
RAA	405	\$128.44
RAA	406	\$121.89
RAA	407	\$133.54
RAA	408	\$127.41
RAA	409	\$132.43
RAA	410	\$132.76
RAA	411	\$132.58
RAA	412	\$132.58
RAA	413	\$125.73
RAA	414	\$131.14

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	415	\$130.68
RAA	416	\$120.60
RAA	417	\$124.25
RAA	418	\$127.36
RAA	419	\$123.92
RAA	420	\$118.88
RAA	421	\$128.71
RAA	422	\$126.28
RAA	423	\$122.50
RAA	424	\$122.08
RAA	425	\$126.21
RAA	426	\$126.21
RAA	427	\$127.07
RAA	428	\$126.79
RAA	429	\$125.98
RAA	430	\$125.79
RAA	431	\$121.31
RAA	432	\$119.82
RAA	433	\$123.27
RAA	434	\$112.25
RAA	435	\$117.41
RAA	436	\$112.74
RAA	437	\$122.00
RAA	438	\$112.16
RAA	439	\$120.58
RAA	440	\$120.80
RAA	441	\$121.06
RAA	442	\$119.02
RAA	443	\$114.81
RAA	444	\$119.55
RAA	445	\$119.55
RAA	446	\$109.27
RAA	447	\$112.58
RAA	448	\$112.46
RAA	449	\$116.21
RAA	450	\$111.68
RAA	451	\$111.91
RAA	452	\$107.22
RAA	453	\$113.95
RAA	454	\$106.99
RAA	455	\$110.12
RAA	456	\$105.35
RAA	457	\$112.39
RAA	458	\$103.71
RAA	459	\$110.36
RAA	460	\$103.29

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	461	\$110.72
RAA	462	\$110.80
RAA	463	\$99.92
RAA	464	\$105.74
RAA	465	\$109.46
RAA	466	\$104.52
RAA	467	\$109.08
RAA	468	\$109.08
RAA	469	\$100.30
RAA	470	\$105.60
RAA	471	\$99.48
RAA	472	\$107.87
RAA	473	\$88.38
RAA	474	\$107.06
RAA	475	\$107.06
RAA	476	\$106.33
RAA	477	\$102.95
RAA	478	\$104.30
RAA	479	\$100.18
RAA	480	\$100.27
RAA	481	\$100.27
RAA	482	\$100.27
RAA	483	\$96.55
RAA	484	\$102.65
RAA	485	\$99.17
RAA	486	\$97.37
RAA	487	\$93.76
RAA	488	\$101.46
RAA	489	\$96.57
RAA	490	\$100.72
RAA	491	\$100.34
RAA	492	\$98.86
RAA	493	\$91.31
RAA	494	\$91.31
RAA	495	\$93.51
RAA	496	\$86.05
RAA	497	\$94.37
RAA	498	\$92.18
RAA	499	\$85.78
RAA	500	\$95.72
RAA	501	\$91.36
RAA	502	\$94.79
RAA	503	\$91.08
RAA	504	\$91.61
RAA	505	\$90.66
RAA	506	\$94.61

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	507	\$90.47
RAA	508	\$94.52
RAA	509	\$94.52
RAA	510	\$94.52
RAA	511	\$93.34
RAA	512	\$92.56
RAA	513	\$92.56
RAA	514	\$91.26
RAA	515	\$89.34
RAA	516	\$89.34
RAA	517	\$93.29
RAA	518	\$89.07
RAA	519	\$92.90
RAA	520	\$92.65
RAA	521	\$88.57
RAA	522	\$90.09
RAA	523	\$88.19
RAA	524	\$92.00
RAA	525	\$87.74
RAA	526	\$87.66
RAA	527	\$87.62
RAA	528	\$88.55
RAA	529	\$88.55
RAA	530	\$88.71
RAA	531	\$90.17
RAA	532	\$89.91
RAA	533	\$89.91
RAA	534	\$89.90
RAA	535	\$82.80
RAA	536	\$85.99
RAA	537	\$87.36
RAA	538	\$89.27
RAA	539	\$79.59
RAA	540	\$88.72
RAA	541	\$88.45
RAA	542	\$87.90
RAA	543	\$87.90
RAA	544	\$87.60
RAA	545	\$86.93
RAA	546	\$86.71
RAA	547	\$83.28
RAA	548	\$84.22
RAA	549	\$84.04
RAA	550	\$77.13
RAA	551	\$83.25
RAA	552	\$79.94

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	553	\$75.80
RAA	554	\$74.82
RAA	555	\$81.14
RAA	556	\$77.11
RAA	557	\$79.81
RAA	558	\$77.78
RAA	559	\$72.33
RAA	560	\$77.81
RAA	561	\$73.62
RAA	562	\$73.54
RAA	563	\$76.49
RAA	564	\$70.38
RAA	565	\$70.38
RAA	566	\$75.76
RAA	567	\$74.05
RAA	568	\$74.78
RAA	569	\$74.62
RAA	570	\$73.78
RAA	571	\$70.86
RAA	572	\$71.54
RAA	573	\$72.46
RAA	574	\$70.95
RAA	575	\$70.65
RAA	576	\$70.65
RAA	577	\$68.84
RAA	578	\$68.84
RAA	579	\$67.05
RAA	580	\$69.47
RAA	581	\$68.58
RAA	582	\$69.05
RAA	583	\$69.05
RAA	584	\$67.97
RAA	585	\$65.32
RAA	586	\$65.65
RAA	587	\$65.65
RAA	588	\$65.65
RAA	589	\$66.62
RAA	590	\$61.31
RAA	591	\$66.29
RAA	592	\$60.01
RAA	593	\$62.19
RAA	594	\$59.48
RAA	595	\$59.48
RAA	596	\$59.39
RAA	597	\$55.91
RAA	598	\$62.46

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	599	\$55.12
RAA	600	\$58.76
RAA	601	\$61.81
RAA	602	\$62.05
RAA	603	\$57.85
RAA	604	\$62.51
RAA	605	\$58.38
RAA	606	\$56.76
RAA	607	\$61.32
RAA	608	\$61.00
RAA	609	\$60.88
RAA	610	\$60.88
RAA	611	\$60.88
RAA	612	\$60.88
RAA	613	\$60.88
RAA	614	\$57.91
RAA	615	\$59.38
RAA	616	\$59.32
RAA	617	\$54.07
RAA	618	\$58.26
RAA	619	\$57.31
RAA	620	\$55.06
RAA	621	\$56.37
RAA	622	\$56.97
RAA	623	\$56.90
RAA	624	\$56.90
RAA	625	\$55.71
RAA	626	\$56.07
RAA	627	\$56.07
RAA	628	\$51.46
RAA	629	\$54.09
RAA	630	\$54.09
RAA	631	\$54.09
RAA	632	\$55.01
RAA	633	\$50.88
RAA	634	\$50.88
RAA	635	\$50.88
RAA	636	\$50.68
RAA	637	\$50.68
RAA	638	\$50.68
RAA	639	\$50.33
RAA	640	\$49.96
RAA	641	\$49.80
RAA	642	\$49.79
RAA	643	\$53.06
RAA	644	\$52.51

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	645	\$49.36
RAA	646	\$52.02
RAA	647	\$52.02
RAA	648	\$53.19
RAA	649	\$52.89
RAA	650	\$48.51
RAA	651	\$52.61
RAA	652	\$49.79
RAA	653	\$50.96
RAA	654	\$48.53
RAA	655	\$46.69
RAA	656	\$50.28
RAA	657	\$48.99
RAA	658	\$45.90
RAA	659	\$46.84
RAA	660	\$47.87
RAA	661	\$47.65
RAA	662	\$43.60
RAA	663	\$47.34
RAA	664	\$46.05
RAA	665	\$45.74
RAA	666	\$41.74
RAA	667	\$44.20
RAA	668	\$43.86
RAA	669	\$43.86
RAA	670	\$44.88
RAA	671	\$44.87
RAA	672	\$38.82
RAA	673	\$38.76
RAA	674	\$42.92
RAA	675	\$44.61
RAA	676	\$44.60
RAA	677	\$44.59
RAA	678	\$43.55
RAA	679	\$40.08
RAA	680	\$42.45
RAA	681	\$39.05
RAA	682	\$36.75
RAA	683	\$41.65
RAA	684	\$38.37
RAA	685	\$38.14
RAA	686	\$39.52
RAA	687	\$37.75
RAA	688	\$38.11
RAA	689	\$36.87
RAA	690	\$37.99

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	691	\$37.99
RAA	692	\$37.99
RAA	693	\$32.14
RAA	694	\$33.67
RAA	695	\$33.43
RAA	696	\$36.25
RAA	697	\$31.94
RAA	698	\$34.79
RAA	699	\$34.79
RAA	700	\$34.79
RAA	701	\$34.79
RAA	702	\$34.79
RAA	703	\$34.79
RAA	704	\$32.26
RAA	705	\$32.59
RAA	706	\$29.56
RAA	707	\$29.30
RAA	708	\$30.17
RAA	709	\$29.00
RAA	710	\$29.00
RAA	711	\$29.00
RAA	712	\$30.64
RAA	713	\$30.64
RAA	714	\$29.58
RAA	715	\$29.03
RAA	716	\$29.20
RAA	717	\$26.39
RAA	718	\$27.80
RAA	719	\$26.86
RAA	720	\$26.02
RAA	721	\$25.36
RAA	722	\$26.80
RAA	723	\$26.71
RAA	724	\$23.55
RAA	725	\$25.22
RAA	726	\$24.84
RAA	727	\$23.67
RAA	728	\$21.50
RAA	729	\$21.92
RAA	730	\$20.38
RAA	731	\$21.99
RAA	732	\$19.35
RAA	733	\$19.75
RAA	734	\$17.43
RAA	735	\$18.60
RAA	736	\$19.33

Attachment A
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
RAA	737	\$19.33
RAA	738	\$18.93
RAA	739	\$16.56
RAA	740	\$18.06
RAA	741	\$17.19
RAA	742	\$16.12
RAA	743	\$17.23
RAA	744	\$16.03
RAA	745	\$16.21
RAA	746	\$15.80
RAA	747	\$15.85
RAA	748	\$15.30
RAA	749	\$15.30
RAA	750	\$14.91
RAA	751	\$14.66
RAA	752	\$14.65
RAA	753	\$14.65
RAA	754	\$14.18
RAA	755	\$13.32
RAA	756	\$11.54
RAA	757	\$12.31
RAA	758	\$10.92
RAA	759	\$11.76
RAA	760	\$11.42
RAA	761	\$10.89
RAA	762	\$10.89
RAA	763	\$9.45
RAA	764	\$7.98
RAA	765	\$9.14
RAA	766	\$7.99
RAA	767	\$7.87
RAA	768	\$7.00
RAA	769	\$5.29
RAA	770	\$5.88
RAA	771	\$4.99
RAA	772	\$5.07
RAA	773	\$4.79
RAA	774	\$4.30
RAA	775	\$4.22
RAA	776	\$3.84
RAA	777	\$1.81
RAA	778	\$0.37
RAA	779	\$0.36
RAA	780	\$0.04

Attachment B
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
SPF	1	\$2,253.81
SPF	2	\$1,244.66
SPF	3	\$1,346.40
SPF	4	\$1,222.23
SPF	5	\$958.23
SPF	6	\$996.21
SPF	7	\$943.87
SPF	8	\$895.44
SPF	9	\$833.12
SPF	10	\$779.55
SPF	11	\$755.88
SPF	12	\$721.75
SPF	13	\$726.93
SPF	14	\$708.34
SPF	15	\$704.15
SPF	16	\$703.86
SPF	17	\$638.07
SPF	18	\$675.21
SPF	19	\$658.13
SPF	20	\$645.42
SPF	21	\$645.42
SPF	22	\$601.83
SPF	23	\$614.35
SPF	24	\$546.50
SPF	25	\$544.21
SPF	26	\$517.87
SPF	27	\$547.88
SPF	28	\$534.78
SPF	29	\$536.50
SPF	30	\$536.50
SPF	31	\$527.05
SPF	32	\$495.71
SPF	33	\$516.06
SPF	34	\$494.16
SPF	35	\$455.64
SPF	36	\$493.09
SPF	37	\$492.22
SPF	38	\$485.97
SPF	39	\$465.88
SPF	40	\$455.42
SPF	41	\$403.99
SPF	42	\$406.92
SPF	43	\$390.05
SPF	44	\$362.52
SPF	45	\$388.73

Attachment B
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
SPF	46	\$385.65
SPF	47	\$371.41
SPF	48	\$361.52
SPF	49	\$372.42
SPF	50	\$357.34
SPF	51	\$353.66
SPF	52	\$335.94
SPF	53	\$307.77
SPF	54	\$321.49
SPF	55	\$318.26
SPF	56	\$319.72
SPF	57	\$319.72
SPF	58	\$300.37
SPF	59	\$307.27
SPF	60	\$297.03
SPF	61	\$309.36
SPF	62	\$293.10
SPF	63	\$293.10
SPF	64	\$302.24
SPF	65	\$301.16
SPF	66	\$299.59
SPF	67	\$295.30
SPF	68	\$288.06
SPF	69	\$284.60
SPF	70	\$279.84
SPF	71	\$289.50
SPF	72	\$264.56
SPF	73	\$263.40
SPF	74	\$278.60
SPF	75	\$275.06
SPF	76	\$254.74
SPF	77	\$263.48
SPF	78	\$246.27
SPF	79	\$246.27
SPF	80	\$266.84
SPF	81	\$266.84
SPF	82	\$266.84
SPF	83	\$260.68
SPF	84	\$253.05
SPF	85	\$254.46
SPF	86	\$254.46
SPF	87	\$234.10
SPF	88	\$251.54
SPF	89	\$229.08

Attachment B
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
SPF	90	\$246.97
SPF	91	\$236.50
SPF	92	\$215.42
SPF	93	\$225.60
SPF	94	\$222.86
SPF	95	\$225.95
SPF	96	\$225.95
SPF	97	\$203.54
SPF	98	\$214.97
SPF	99	\$222.28
SPF	100	\$213.83
SPF	101	\$208.14
SPF	102	\$216.93
SPF	103	\$190.42
SPF	104	\$180.48
SPF	105	\$197.62
SPF	106	\$181.65
SPF	107	\$192.80
SPF	108	\$188.63
SPF	109	\$186.43
SPF	110	\$179.20
SPF	111	\$183.41
SPF	112	\$177.99
SPF	113	\$177.99
SPF	114	\$176.74
SPF	115	\$176.74
SPF	116	\$169.50
SPF	117	\$159.87
SPF	118	\$156.30
SPF	119	\$168.48
SPF	120	\$165.50
SPF	121	\$152.77
SPF	122	\$161.83
SPF	123	\$156.19
SPF	124	\$161.85
SPF	125	\$154.38
SPF	126	\$158.00
SPF	127	\$158.07
SPF	128	\$158.56
SPF	129	\$153.66
SPF	130	\$153.44
SPF	131	\$140.59
SPF	132	\$140.44
SPF	133	\$150.82
SPF	134	\$144.01

Attachment B
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
SPF	135	\$147.78
SPF	136	\$147.16
SPF	137	\$141.52
SPF	138	\$145.24
SPF	139	\$144.16
SPF	140	\$128.16
SPF	141	\$135.94
SPF	142	\$137.92
SPF	143	\$133.18
SPF	144	\$129.37
SPF	145	\$129.37
SPF	146	\$118.97
SPF	147	\$118.97
SPF	148	\$122.77
SPF	149	\$122.66
SPF	150	\$113.64
SPF	151	\$121.79
SPF	152	\$121.65
SPF	153	\$124.10
SPF	154	\$120.10
SPF	155	\$116.28
SPF	156	\$120.17
SPF	157	\$114.88
SPF	158	\$119.54
SPF	159	\$119.37
SPF	160	\$112.04
SPF	161	\$118.60
SPF	162	\$117.89
SPF	163	\$112.69
SPF	164	\$116.51
SPF	165	\$112.83
SPF	166	\$112.83
SPF	167	\$107.72
SPF	168	\$106.91
SPF	169	\$102.75
SPF	170	\$109.51
SPF	171	\$100.68
SPF	172	\$108.91
SPF	173	\$108.79
SPF	174	\$106.68
SPF	175	\$106.96
SPF	176	\$104.50
SPF	177	\$105.95
SPF	178	\$101.55
SPF	179	\$104.33

Attachment B
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
SPF	180	\$98.17
SPF	181	\$101.67
SPF	182	\$101.67
SPF	183	\$97.09
SPF	184	\$98.61
SPF	185	\$97.41
SPF	186	\$86.66
SPF	187	\$92.18
SPF	188	\$90.66
SPF	189	\$90.37
SPF	190	\$94.04
SPF	191	\$91.90
SPF	192	\$83.92
SPF	193	\$78.69
SPF	194	\$87.73
SPF	195	\$85.91
SPF	196	\$84.76
SPF	197	\$84.55
SPF	198	\$83.58
SPF	199	\$83.07
SPF	200	\$83.07
SPF	201	\$83.07
SPF	202	\$82.55
SPF	203	\$75.24
SPF	204	\$75.20
SPF	205	\$80.38
SPF	206	\$78.34
SPF	207	\$77.85
SPF	208	\$78.13
SPF	209	\$71.89
SPF	210	\$75.39
SPF	211	\$75.32
SPF	212	\$68.76
SPF	213	\$68.76
SPF	214	\$71.31
SPF	215	\$66.75
SPF	216	\$64.40
SPF	217	\$64.85
SPF	218	\$59.10
SPF	219	\$57.31
SPF	220	\$57.31
SPF	221	\$61.79
SPF	222	\$60.07
SPF	223	\$60.80
SPF	224	\$60.80

Attachment B
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
SPF	225	\$60.80
SPF	226	\$59.75
SPF	227	\$58.51
SPF	228	\$58.16
SPF	229	\$56.98
SPF	230	\$56.98
SPF	231	\$53.25
SPF	232	\$53.25
SPF	233	\$53.75
SPF	234	\$55.40
SPF	235	\$55.40
SPF	236	\$55.89
SPF	237	\$53.72
SPF	238	\$52.02
SPF	239	\$53.11
SPF	240	\$52.19
SPF	241	\$51.96
SPF	242	\$51.13
SPF	243	\$49.89
SPF	244	\$49.89
SPF	245	\$44.16
SPF	246	\$47.78
SPF	247	\$47.78
SPF	248	\$43.57
SPF	249	\$43.57
SPF	250	\$46.69
SPF	251	\$45.24
SPF	252	\$45.47
SPF	253	\$45.12
SPF	254	\$43.92
SPF	255	\$44.51
SPF	256	\$43.39
SPF	257	\$39.65
SPF	258	\$39.65
SPF	259	\$39.65
SPF	260	\$39.55
SPF	261	\$35.68
SPF	262	\$36.02
SPF	263	\$31.84
SPF	264	\$29.00
SPF	265	\$29.00
SPF	266	\$29.00
SPF	267	\$28.26
SPF	268	\$25.88
SPF	269	\$27.30

Attachment B
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
SPF	270	\$24.53
SPF	271	\$22.11
SPF	272	\$22.56
SPF	273	\$20.99
SPF	274	\$20.58
SPF	275	\$19.85
SPF	276	\$19.70
SPF	277	\$17.29
SPF	278	\$17.15
SPF	279	\$15.05
SPF	280	\$11.78
SPF	281	\$11.78
SPF	282	\$11.65
SPF	283	\$10.78
SPF	284	\$5.50
SPF	285	\$4.45
SPF	286	\$4.65
SPF	287	\$1.83
SPF	288	\$1.83
SPF	289	\$2.04
SPF	290	\$1.01

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	1	\$4,215.24
FSC	2	\$4,048.41
FSC	3	\$2,851.86
FSC	4	\$2,730.18
FSC	5	\$2,730.06
FSC	6	\$2,518.37
FSC	7	\$2,322.90
FSC	8	\$1,973.44
FSC	9	\$1,944.69
FSC	10	\$1,772.71
FSC	11	\$1,741.34
FSC	12	\$1,636.92
FSC	13	\$1,637.73
FSC	14	\$1,675.12
FSC	15	\$1,621.51
FSC	16	\$1,473.25
FSC	17	\$1,468.53
FSC	18	\$1,312.68
FSC	19	\$1,332.48
FSC	20	\$1,156.08
FSC	21	\$1,179.99
FSC	22	\$1,116.47
FSC	23	\$1,165.98
FSC	24	\$1,112.51
FSC	25	\$1,013.97
FSC	26	\$950.17
FSC	27	\$986.09
FSC	28	\$964.98
FSC	29	\$897.68
FSC	30	\$883.15
FSC	31	\$903.65
FSC	32	\$892.65
FSC	33	\$892.65
FSC	34	\$861.17
FSC	35	\$832.09
FSC	36	\$768.00
FSC	37	\$768.00
FSC	38	\$796.39
FSC	39	\$782.71
FSC	40	\$755.57
FSC	41	\$706.91
FSC	42	\$734.73
FSC	43	\$722.08
FSC	44	\$724.42
FSC	45	\$724.42

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	46	\$708.51
FSC	47	\$703.83
FSC	48	\$641.17
FSC	49	\$665.64
FSC	50	\$638.08
FSC	51	\$638.08
FSC	52	\$640.50
FSC	53	\$648.14
FSC	54	\$638.21
FSC	55	\$600.91
FSC	56	\$616.45
FSC	57	\$617.94
FSC	58	\$617.94
FSC	59	\$574.37
FSC	60	\$578.69
FSC	61	\$538.57
FSC	62	\$537.14
FSC	63	\$510.57
FSC	64	\$546.08
FSC	65	\$498.16
FSC	66	\$475.09
FSC	67	\$494.42
FSC	68	\$488.44
FSC	69	\$486.13
FSC	70	\$483.09
FSC	71	\$435.11
FSC	72	\$446.52
FSC	73	\$446.91
FSC	74	\$443.53
FSC	75	\$408.19
FSC	76	\$406.66
FSC	77	\$403.99
FSC	78	\$437.13
FSC	79	\$429.56
FSC	80	\$412.06
FSC	81	\$424.38
FSC	82	\$429.27
FSC	83	\$427.97
FSC	84	\$427.97
FSC	85	\$411.55
FSC	86	\$386.26
FSC	87	\$372.11
FSC	88	\$381.52
FSC	89	\$353.28
FSC	90	\$378.04

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	91	\$360.54
FSC	92	\$349.26
FSC	93	\$361.47
FSC	94	\$328.80
FSC	95	\$355.95
FSC	96	\$341.21
FSC	97	\$341.21
FSC	98	\$339.60
FSC	99	\$322.68
FSC	100	\$313.01
FSC	101	\$298.25
FSC	102	\$273.08
FSC	103	\$275.99
FSC	104	\$275.99
FSC	105	\$271.78
FSC	106	\$283.36
FSC	107	\$271.91
FSC	108	\$278.87
FSC	109	\$276.65
FSC	110	\$262.75
FSC	111	\$262.14
FSC	112	\$249.96
FSC	113	\$260.98
FSC	114	\$247.57
FSC	115	\$256.16
FSC	116	\$255.50
FSC	117	\$245.31
FSC	118	\$245.26
FSC	119	\$256.86
FSC	120	\$248.64
FSC	121	\$254.93
FSC	122	\$258.28
FSC	123	\$246.71
FSC	124	\$254.83
FSC	125	\$253.82
FSC	126	\$231.75
FSC	127	\$247.54
FSC	128	\$242.45
FSC	129	\$237.02
FSC	130	\$238.01
FSC	131	\$231.30
FSC	132	\$231.76
FSC	133	\$231.80
FSC	134	\$228.73
FSC	135	\$226.09

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	136	\$226.34
FSC	137	\$224.04
FSC	138	\$205.25
FSC	139	\$210.34
FSC	140	\$202.03
FSC	141	\$198.86
FSC	142	\$215.05
FSC	143	\$215.05
FSC	144	\$198.16
FSC	145	\$203.42
FSC	146	\$191.77
FSC	147	\$192.73
FSC	148	\$195.13
FSC	149	\$190.41
FSC	150	\$195.48
FSC	151	\$179.12
FSC	152	\$185.33
FSC	153	\$185.01
FSC	154	\$174.20
FSC	155	\$179.82
FSC	156	\$186.54
FSC	157	\$186.54
FSC	158	\$186.53
FSC	159	\$177.01
FSC	160	\$183.94
FSC	161	\$175.10
FSC	162	\$167.28
FSC	163	\$177.97
FSC	164	\$177.44
FSC	165	\$172.93
FSC	166	\$177.50
FSC	167	\$177.50
FSC	168	\$168.46
FSC	169	\$168.39
FSC	170	\$167.06
FSC	171	\$174.46
FSC	172	\$171.84
FSC	173	\$172.43
FSC	174	\$171.91
FSC	175	\$171.91
FSC	176	\$171.91
FSC	177	\$172.19
FSC	178	\$170.63
FSC	179	\$170.63
FSC	180	\$161.82

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	181	\$160.89
FSC	182	\$163.64
FSC	183	\$158.65
FSC	184	\$158.64
FSC	185	\$164.41
FSC	186	\$164.16
FSC	187	\$164.09
FSC	188	\$164.09
FSC	189	\$159.77
FSC	190	\$154.49
FSC	191	\$161.72
FSC	192	\$154.28
FSC	193	\$158.94
FSC	194	\$157.86
FSC	195	\$151.22
FSC	196	\$150.92
FSC	197	\$143.27
FSC	198	\$143.27
FSC	199	\$137.80
FSC	200	\$137.56
FSC	201	\$137.97
FSC	202	\$137.96
FSC	203	\$137.25
FSC	204	\$142.17
FSC	205	\$134.73
FSC	206	\$138.97
FSC	207	\$138.97
FSC	208	\$138.97
FSC	209	\$127.91
FSC	210	\$126.21
FSC	211	\$130.87
FSC	212	\$131.03
FSC	213	\$127.67
FSC	214	\$127.95
FSC	215	\$121.46
FSC	216	\$121.26
FSC	217	\$124.85
FSC	218	\$120.37
FSC	219	\$113.59
FSC	220	\$122.72
FSC	221	\$120.87
FSC	222	\$110.26
FSC	223	\$110.26
FSC	224	\$114.54
FSC	225	\$118.47

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	226	\$115.88
FSC	227	\$108.19
FSC	228	\$117.00
FSC	229	\$114.89
FSC	230	\$114.89
FSC	231	\$104.48
FSC	232	\$112.71
FSC	233	\$107.59
FSC	234	\$102.85
FSC	235	\$106.64
FSC	236	\$106.55
FSC	237	\$106.66
FSC	238	\$110.59
FSC	239	\$106.10
FSC	240	\$109.98
FSC	241	\$99.37
FSC	242	\$99.37
FSC	243	\$109.07
FSC	244	\$106.01
FSC	245	\$108.25
FSC	246	\$108.19
FSC	247	\$108.19
FSC	248	\$104.50
FSC	249	\$105.88
FSC	250	\$92.75
FSC	251	\$96.65
FSC	252	\$94.74
FSC	253	\$94.74
FSC	254	\$102.15
FSC	255	\$99.22
FSC	256	\$91.93
FSC	257	\$95.00
FSC	258	\$99.35
FSC	259	\$99.35
FSC	260	\$96.92
FSC	261	\$90.23
FSC	262	\$93.19
FSC	263	\$89.09
FSC	264	\$94.35
FSC	265	\$94.30
FSC	266	\$93.46
FSC	267	\$88.25
FSC	268	\$90.50
FSC	269	\$91.13
FSC	270	\$93.50

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	271	\$93.50
FSC	272	\$92.05
FSC	273	\$89.45
FSC	274	\$88.39
FSC	275	\$87.94
FSC	276	\$83.77
FSC	277	\$83.77
FSC	278	\$85.54
FSC	279	\$88.49
FSC	280	\$82.04
FSC	281	\$80.07
FSC	282	\$87.49
FSC	283	\$82.98
FSC	284	\$79.36
FSC	285	\$79.36
FSC	286	\$85.76
FSC	287	\$85.76
FSC	288	\$80.15
FSC	289	\$79.85
FSC	290	\$74.24
FSC	291	\$78.80
FSC	292	\$82.13
FSC	293	\$81.99
FSC	294	\$78.68
FSC	295	\$74.05
FSC	296	\$78.85
FSC	297	\$70.39
FSC	298	\$74.72
FSC	299	\$74.82
FSC	300	\$74.48
FSC	301	\$71.66
FSC	302	\$70.94
FSC	303	\$66.27
FSC	304	\$69.22
FSC	305	\$64.85
FSC	306	\$64.85
FSC	307	\$64.72
FSC	308	\$62.80
FSC	309	\$68.14
FSC	310	\$68.58
FSC	311	\$68.43
FSC	312	\$68.43
FSC	313	\$67.96
FSC	314	\$63.37
FSC	315	\$64.64

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	316	\$64.64
FSC	317	\$64.29
FSC	318	\$58.77
FSC	319	\$61.59
FSC	320	\$57.23
FSC	321	\$61.53
FSC	322	\$59.76
FSC	323	\$55.13
FSC	324	\$54.50
FSC	325	\$56.01
FSC	326	\$53.25
FSC	327	\$54.19
FSC	328	\$56.54
FSC	329	\$51.67
FSC	330	\$51.67
FSC	331	\$51.67
FSC	332	\$53.62
FSC	333	\$52.75
FSC	334	\$53.39
FSC	335	\$53.27
FSC	336	\$50.82
FSC	337	\$51.20
FSC	338	\$50.78
FSC	339	\$45.91
FSC	340	\$49.35
FSC	341	\$49.26
FSC	342	\$48.13
FSC	343	\$48.13
FSC	344	\$45.16
FSC	345	\$44.57
FSC	346	\$44.57
FSC	347	\$44.57
FSC	348	\$44.57
FSC	349	\$44.11
FSC	350	\$41.70
FSC	351	\$40.20
FSC	352	\$40.20
FSC	353	\$38.42
FSC	354	\$39.03
FSC	355	\$37.29
FSC	356	\$36.45
FSC	357	\$36.97
FSC	358	\$36.86
FSC	359	\$36.26
FSC	360	\$33.99

Attachment C
AWC No. 2019062531501

BD	Cust. ID	Principal Amount
FSC	361	\$36.63
FSC	362	\$33.21
FSC	363	\$35.65
FSC	364	\$31.42
FSC	365	\$30.32
FSC	366	\$31.18
FSC	367	\$32.60
FSC	368	\$32.60
FSC	369	\$32.44
FSC	370	\$32.18
FSC	371	\$31.03
FSC	372	\$31.02
FSC	373	\$30.99
FSC	374	\$28.50
FSC	375	\$28.50
FSC	376	\$27.60
FSC	377	\$25.61
FSC	378	\$25.82
FSC	379	\$24.95
FSC	380	\$24.16
FSC	381	\$21.44
FSC	382	\$22.11
FSC	383	\$22.11
FSC	384	\$22.11
FSC	385	\$22.11
FSC	386	\$18.06
FSC	387	\$17.88
FSC	388	\$17.48
FSC	389	\$17.48
FSC	390	\$13.74
FSC	391	\$11.91
FSC	392	\$7.85
FSC	393	\$7.27
FSC	394	\$6.72
FSC	395	\$5.78
FSC	396	\$4.48
FSC	397	\$4.96
FSC	398	\$2.52
FSC	399	\$2.29
FSC	400	\$2.03
FSC	401	\$0.28