

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

Department of Enforcement,

Complainant,

v.

Sidney Lebental,
CRD No. 5543658,

Respondent.

Disciplinary Proceeding
No. 2019063152202

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. From October 2014 through February 2021 (the Relevant Period), Respondent Sidney Lebental engaged in 523 instances of “spoofing,” a type of fraudulent trading that involves the use of non–bona fide orders to induce executions of bona fide orders entered on the opposite side of the market in the same security or a correlated product.

2. Lebental engaged in spoofing while trading as a market maker in U.S. Treasury Bonds and supervising the U.S. Treasury desk of his FINRA member firm. In each instance, Lebental entered a large, fully displayed non–bona fide order to purchase or sell the 30-year U.S. Treasury Bond (30-year Bond). At the time he entered the non–bona fide order, Lebental already had a bona fide order on the opposite side of the market in either the 30-year Bond or the correlated Ultra Treasury Bond future (Ultra T-Bond). The non–bona fide order created a false appearance of market depth and activity so that Lebental’s bona fide order would receive favorable executions at better prices. Specifically, market participants on the other side of the

spread from his bona fide order responded by crossing the spread and executing at his price, or if the spread had moved as a result, Lebental sometimes got an even better price.

3. In each of the 523 instances, after receiving executions of his bona fide order, Lebental cancelled the non-bona fide order within three seconds of entry. In 370 of these instances, Lebental cancelled his non-bona fide order within one second of entry.

4. As a result, Lebental willfully violated Section 10(b) of the Securities Exchange Act of 1934 and Exchange Act Rules 10b-5(a) and (c), and violated FINRA Rules 5210, 2020, and 2010 (independently and by acting in contravention of Sections 17(a)(1) and (a)(3) of the Securities Act of 1933).

RESPONDENT AND JURISDICTION

5. Lebental first registered with FINRA in 2008. In October 2014, Lebental became registered as a General Securities Representative through his association with Merrill Lynch, Pierce, Fenner & Smith Inc. In April 2015, Lebental also became registered as a General Securities Principal through his association with Merrill Lynch. In May 2019, Merrill Lynch's investment banking and trading divisions were reorganized as BofA Securities, Inc. As a result of a mass transfer in May 2019, Lebental's association with Merrill Lynch was terminated, and he became registered with FINRA through his association with BofA Securities.

6. On May 25, 2021, BofA Securities filed a Uniform Termination Notice for Securities Industry Registration (Form U5) stating that Lebental voluntarily terminated his association with the firm. Although Lebental is no longer registered or associated with a FINRA member, he remains subject to FINRA's jurisdiction for purposes of this proceeding, pursuant to Article V, Section 4 of FINRA's By-Laws, because (1) the Complaint was filed within two years after May 25, 2021, which was the effective date of termination of Respondent's registration

with BofA Securities, and (2) the Complaint charges him with misconduct committed while he was registered or associated with a FINRA member.

FACTS

I. Spoofing

7. Spoofing is a type of fraud that involves displaying a non-bona fide order (*i.e.*, an order that the trader intends to cancel before execution) in a security. Spoofing can be used to affect the price or volume of the security, for the purpose of inducing other market participants to execute against an order on the opposite side of the market in the same security or a correlated product. Spoofing can deceive other market participants into trading at a time, price, or quantity that they otherwise would not have.

II. Trading in the U.S. Treasury Cash and Futures Markets

A. U.S. Treasury Cash Market

8. U.S. Treasury securities are debt instruments of the U.S. government issued through public auctions and subsequently traded in the secondary, or “cash,” market. As of April 2023, outstanding U.S. Treasury securities were valued at \$24.3 trillion. Treasury securities range in maturity from Treasury Bills (as short as four weeks) to Treasury Bonds (up to 30 years).

9. The secondary market for U.S. Treasury securities includes an active inter-dealer market on electronic trading venues.

10. The largest electronic venue for secondary market transactions in U.S. Treasury securities during the Relevant Period was Trading Venue A. For example, in the fourth quarter of 2017, approximately 80 percent of inter-dealer U.S. Treasury securities transactions executed

via an electronic trading venue occurred on Trading Venue A. The remaining approximately 20 percent was divided among several venues, including Trading Venue B and Trading Venue C.

B. U.S. Treasury Futures Market

11. U.S. Treasury futures contracts allow a buyer and seller to agree upon a price for future delivery of a Treasury security. For example, the Ultra T-Bond contract requires delivery of a Treasury Bond with a remaining maturity of 25–30 years. This delivery obligation ensures that Treasury futures prices are closely tied to the prices of the underlying Treasury securities and their yields. Accordingly, the price of the Ultra T-Bond is closely correlated with the price of the 30-year Bond.

C. Spoofing Injects False Information into the Marketplace and Can Induce Other Market Participants to Trade on that False Information

12. The U.S. Treasury cash and futures markets were highly liquid during the Relevant Period. For example, in 2018, the daily notional value of Treasury securities traded was \$547 billion and Treasury futures traded was \$477 billion.

13. Both Treasury securities and futures trade on narrow bid–offer spreads, usually with only a few cents separating the best bid and offer prices. The highest bid and the lowest offer constitute the best or “inside” market in a given security.

14. The displayed liquidity, or market depth, at the bid and offer in both the cash and futures markets is known as the “stack.” The stack displays the quantities available at various prices. The “top” of the stack refers to the quantities available at the inside prices.

15. Market participants consider the “balance” between displayed bid and offer quantities on both sides of the stack to determine whether the next transaction will likely occur at the best bid or offer or if the price is likely to change.

16. For example, when the stack for the 30-year Bond is imbalanced with significantly more displayed quantity on the best bid versus the best offer, market participants may reasonably believe there is more demand than supply and that the price is likely to rise for the 30-year Bond and the correlated Ultra T-Bond. Participants may therefore (1) increase the best bid and best offer prices or (2) cross the spread by entering aggressive buy orders, *i.e.*, orders priced to execute against sell orders already in the stack, because the best offer price appears favorable given the anticipated increase in price.

17. Treasury market participants can fully display the quantity of their orders or enter them with only a portion of the quantity displayed, commonly referred to as “iceberg” orders. For example, an iceberg order to purchase \$50 million par value of the 30-year Bond can be displayed to the market as an order to purchase only \$1 million par value of the 30-year Bond.

18. Market participants frequently use iceberg orders to manage order exposure and mitigate the price impact that can result from entering fully displayed orders that imbalance the stack. Iceberg orders are themselves permissible, but they can facilitate deceptive trading by concealing the participant’s true trading interest.

19. In a spoofing scheme, for example, a trader may seek to induce other market participants to execute the trader’s iceberg order by placing a large, fully displayed order on the opposite side of the market to create the appearance of an imbalanced stack. A spoofing scheme can involve iceberg and fully displayed orders in correlated products, like the 30-year Bond and Ultra T-Bond.

III. Lebental Engaged in Spoofing in the U.S. Treasury Markets

20. Lebental was the head of Merrill Lynch’s U.S. Treasury desk until 2018, and supervised the traders on that desk.

21. In 2018, Lebental was promoted to head of Americas Linear Rates. In that role, Lebental oversaw multiple desks, including the U.S. Treasury desk.

22. Throughout the Relevant Period, Lebental was also responsible for Treasury trading, specifically market making in longer-maturity Treasury Bonds, including the 30-year Bond. He managed a trading book valued at approximately \$15 billion to \$20 billion.

23. Lebental's goal as a market maker was to buy a security on the best bid and sell it on the best offer, retaining the bid-offer spread. Lebental also traded in Treasury futures, including the Ultra T-Bond, for hedging purposes.

24. For both U.S. Treasury securities and futures, Lebental used BofA's proprietary order routing system, Pioneer, to view quantities available at various prices in the stack and to place orders.

- a. For U.S. Treasury securities, Pioneer aggregated volume from Trading Venues A, B, and C.
- b. For U.S. Treasury futures, Pioneer displayed available volume from the national futures exchange.
- c. Pioneer allowed the trader to manually place orders, either fully displayed or partially displayed (as an iceberg).
- d. Pioneer allowed the trader to cancel both fully and partially displayed orders.
- e. Pioneer routed, or sent, orders elsewhere for execution. U.S. Treasury securities orders were routed to at least one of the three Trading Venues (A, B, or C), and U.S. Treasury futures orders were routed to the national futures exchange.

25. During the Relevant Period, Lebental entered 523 large, non–bona fide orders in the 30-year Bond to induce the execution of bona fide orders on the opposite side of the market in the 30-year Bond or the correlated Ultra T-Bond. These instances are listed in **Exhibit A** hereto.

26. Lebental’s spoofing followed the same pattern:

- a. Lebental entered bona fide purchase or sale orders in the 30-year Bond or Ultra T-Bond, almost always at the inside price and as iceberg orders with only the minimum size displayed (\$1 million in the 30-year Bond or one Ultra T-Bond contract, which had a par value of \$100,000).
- b. On the opposite side of the market, Lebental entered fully displayed non–bona fide orders in the 30-year Bond at a large size, almost always at or above \$50 million par value. The display size for the 30-year Bond at the top of the stack was typically a small fraction of Lebental’s order size. As a result, Lebental’s non–bona fide orders created a false appearance of market depth and interest on one side of the market.
- c. Market participants on the same side as Lebental’s non–bona fide order responded by crossing the spread and executing at the price of his bona fide order or if the spread had moved as a result, Lebental sometimes got an even better price.
- d. Within three seconds of entry, Lebental cancelled the non–bona fide orders.

27. Lebental cancelled 370 of the 523 non–bona fide orders within one second.

28. As a result of their rapid cancellation, the overwhelming majority of Lebental's non-bona fide orders (447 of 523) received no executions and the remaining 76 orders were executed for less than 15 percent of their size.

29. Lebental's non-bona fide orders injected false information into the marketplace concerning the true supply and demand for the 30-year Bond and the correlated Ultra T-Bond and induced other market participants to execute against his bona fide orders at his bid or offer or, if the spread had moved as a result, Lebental sometimes got an even better price.

IV. Examples of Lebental's Spoofing

A. On April 7, 2020, Lebental Spoofed the Cash Market to Obtain Better Executions in the Futures Market

30. On April 7, 2020, Lebental created an imbalanced stack by entering and immediately cancelling a fully displayed order to sell \$50 million par value of the 30-year Bond. Lebental received no executions on this order, but it created the false appearance of sell interest in the market. By engaging in this activity, Lebental received favorable executions on his previously entered iceberg order to buy 50 Ultra T-Bond contracts.

31. At 16:08:26.311,¹ Lebental entered an iceberg order to buy 50 Ultra T-Bond contracts at the best bid of \$224, with one contract (\$224,000 notional value) displayed. Over the next 27 seconds, Lebental bought two contracts at a price of \$224.

32. At 16:08:53.404, Lebental entered a fully displayed order to sell \$50 million par value of the 30-year Bond at the existing best offer on Trading Venue A of \$116.96875. Pioneer routed this order to Trading Venue A and Trading Venue B. This order increased the best offer size from \$2 million to \$52 million — an increase in the displayed liquidity of 2,600 percent —

¹ The times displayed in this format are in military format, Eastern Standard Time and reflect milliseconds. For example, 16:08:26.311 is 4:08 p.m. and 26 seconds, 311 milliseconds.

and created an imbalanced stack compared with the displayed best bid volumes for the 30-year Bond (\$3 million, or three “lots”) and Ultra T-Bond (one contract, or one lot, corresponding to Lebental’s iceberg order).

33. Over the next 835 milliseconds, Lebental bought 30 Ultra T-Bond contracts (or 60 percent of his iceberg order) and then cancelled his unexecuted sell order. He bought 27 contracts at the best bid (\$224) and 3 contracts at a better price (\$223.96875) by inducing other participants to (1) cross the spread or (2) lower the best offer.

34. Following Lebental’s cancellation, the market for the Ultra T-Bond reverted to the quote prices that existed prior to Lebental’s non-bona fide order and it took almost 28 seconds for Lebental to execute the remaining 18 contracts of his iceberg order.

B. On October 9, 2019, Lebental Engaged in Four Instances of Spoofing in 93 Seconds

35. On October 9, 2019, Lebental entered and rapidly cancelled a series of four fully displayed non-bona fide orders to buy a total of \$200 million par value of the 30-year Bond. He received no executions on his non-bona fide orders, but did receive favorable executions of two iceberg orders to sell 100 Ultra T-Bond contracts by inducing other market participants to (1) cross the spread and enter aggressive buy orders to execute against his sell orders and (2) raise their bids so Lebental could sell at his offer price.

36. At 16:33:04.301, Lebental entered a bona fide iceberg order to sell 100 Ultra T-Bond contracts at a new best offer of \$193.65625, with a displayed size of one contract (\$193,656 notional value). Over the next 14½ seconds, Lebental sold 67 contracts at \$193.65625.

- a. Lebental sold 47 contracts within the first six seconds but received no executions over the next 5½ seconds.

- b. At 16:33:15.794, Lebental entered an order to buy \$5 million of the 30-year Bond at \$103.765625, which crossed the spread and was filled within 29 milliseconds. Within 68 milliseconds of displaying his order to buy the 30-year Bond, Lebental sold 19 Ultra T-Bond contracts at \$193.65625.
- c. Over the remaining three seconds of the 14½-second period, Lebental sold only one Ultra T-Bond contract on his bona fide order at \$193.65625.

1. Lebental Enters a Non–Bona Fide Order and Cancels it in Under One Second

37. At 16:33:18.873, Lebental entered his first non–bona fide order — a fully displayed order to buy \$50 million par value of the 30-year Bond at \$103.75, which established a new best bid and created an imbalanced stack compared with the displayed sizes of the best offers for the 30-year Bond and the correlated Ultra T-Bond (neither larger than two lots).

38. Lebental displayed and then cancelled his non–bona fide order in less than a second. In 783 milliseconds:

- a. Lebental sold 22 Ultra T-Bond contracts at his offer of \$193.65625 for approximately \$4.2 million; and
- b. Lebental received no fills on his non–bona fide order.

39. For the next 11 seconds, Lebental received no fills on the 11 Ultra T-Bond contracts remaining on his bona fide iceberg order.

40. At 16:33:30.201, Lebental entered a second bona fide iceberg order to sell another 100 Ultra T-Bond contracts at the best offer of \$193.65625, with a displayed size of one contract. Lebental’s two iceberg orders had a total displayed size of two contracts.

2. Lebental Enters a Second Non–Bona Fide Order and Cancels it in Under One Second

41. At 16:33:34.306, still with no executions of his iceberg orders since cancelling his first non–bona fide order 15 seconds earlier, Lebental entered a second fully displayed non–bona fide order with the same terms as his first non–bona fide order. The second non–bona fide order reestablished Lebental’s \$103.75 best bid and recreated an imbalanced stack.

42. Lebental displayed and then cancelled his second non–bona fide order in less than a second. In 920 milliseconds:

- a. Lebental sold 44 Ultra T-Bond contracts at his offer of \$193.65625 for approximately \$8.5 million, which filled the remaining 11 contracts on his first bona fide order and filled 33 contracts on his second bona fide order; and
- b. Lebental received no fills on his second non–bona fide order.

43. For the next eight seconds, Lebental received no fills on the 67 Ultra T-Bond contracts remaining on his second bona fide iceberg order.

3. Lebental Enters a Third Non–Bona Fide Order and Cancels it in Under One Second

44. At 16:33:42.772, Lebental entered a third fully displayed non–bona fide order with the same terms as his previous two non–bona fide orders, thereby reestablishing his \$103.75 best bid and recreating an imbalanced stack.

45. Lebental displayed and then cancelled his third non–bona fide order in less than a second. In 893 milliseconds:

- a. Lebental sold 33 Ultra T-Bond contracts at his offer of \$193.65625 for approximately \$6.4 million; and
- b. Lebental received no fills on his third non–bona fide order.

46. Lebental sold one more Ultra T-Bond contract on his second bona fide order 103 milliseconds after cancelling his third non-bona fide order.

47. For the next 67 seconds, Lebental received no fills on the 33 Ultra T-Bond contracts remaining on his second bona fide iceberg order. During this time:

- a. At 16:33:56.948, Lebental displayed an order to buy \$25 million par value of the 30-year Bond at the same price as his previous non-bona fide orders, and cancelled it in 1.133 seconds. He received no fills on any order while this order was displayed.
- b. At 16:34:16.633, Lebental displayed an order to buy \$5 million par value of the 30-year Bond at the same price as his previous non-bona fide orders, and cancelled it in seven seconds. He received no fills on any order while this order was displayed.²

4. Lebental Enters a Fourth Non-Bona Fide Order and Cancels it in Under One Second

48. At 16:34:50.482, Lebental entered a fourth fully displayed non-bona fide order with the same terms as his three previous non-bona fide orders. This order established \$103.75 as the new best bid and recreated an imbalanced stack.

49. Lebental displayed and then cancelled his fourth non-bona fide order in less than a second. In 966 milliseconds:

- a. Lebental sold 14 Ultra T-Bond contracts at his offer of \$193.65625 for approximately \$2.7 million; and
- b. Lebental received no fills on his fourth non-bona fide order.

² These orders are not included in the 523 instances of spoofing alleged herein.

50. Over the next 66 seconds before cancelling his second bona fide iceberg order at 16:35:57.076, Lebental only sold one Ultra T-Bond contract (at \$193.65625), leaving 18 contracts unfilled.

51. In total, over the span of almost 93 seconds (16:33:18.873 to 16:34:51.448), Lebental entered and cancelled four fully displayed non-bona fide orders in the 30-year Bond — none of which were live for more than a second and all of which went completely unexecuted — to induce executions of his iceberg Ultra T-Bond orders (totaling 113 contracts).

FIRST CAUSE OF ACTION

Fraud

(Willful Violations of Section 10(b) of the Exchange Act and Exchange Act Rules 10b-5(a) and (c); and Violations of FINRA Rules 2020 and 2010)

52. The Department of Enforcement realleges and incorporates by reference all preceding paragraphs.

53. Section 10(b) of the Exchange Act states that

it shall be unlawful for any person, directly or indirectly, by use of any means or instrumentality of interstate commerce or of the mails, or of any facility of any national securities exchange — [t]o use or employ, in connection with the purchase or sale of any security . . . any manipulative or deceptive device or contrivance in contravention of such rules or regulations as the Commission may prescribe as necessary or appropriate in the public interest or for the protection of investors.

54. Exchange Act Rule 10b-5, entitled “Employment of manipulative and deceptive devices,” states:

It shall be unlawful for any person, directly or indirectly, by the use of any means or instrumentality of interstate commerce, or of the mails or of any facility of any national securities exchange, (a) To employ any device, scheme, or artifice to defraud . . . or (c) [t]o engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person, in connection with the purchase or sale of any security.

55. FINRA Rule 2020 provides that “[n]o member shall effect any transaction in, or induce the purchase or sale of, any security by means of any manipulative, deceptive or other fraudulent device or contrivance.”

56. Under FINRA Rule 0140(a), “[p]ersons associated with a member shall have the same duties and obligations as a member under [FINRA] Rules.”

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

58. A violation of Section 10(b) of the Exchange Act, Exchange Act Rule 10b-5, or FINRA Rule 2020 constitutes a violation of FINRA Rule 2010.

59. Lebental employed his fraudulent and deceptive spoofing scheme in the 523 instances to create the materially false and misleading appearance of market activity and supply or demand, and thereby induce other market participants to execute against his bona fide order. This allowed Lebental to buy or sell U.S. Treasury securities or futures at more favorable prices or quantities than would have been possible at that time had he not created a false and misleading appearance of market activity and supply or demand.

60. Lebental acted with scienter in each of the 523 instances by entering orders with the intent to cancel them before execution to intentionally, or at least recklessly, create an artificial imbalance in the stack and induce executions of his opposite-side bona fide orders. He cancelled all of the 523 non-bona fide orders within three seconds of entry and cancelled 370 of them within one second (*i.e.*, within just milliseconds of entry).

61. Lebental carried out his fraudulent and deceptive acts using means or instrumentalities of interstate commerce. Lebental used interstate electronic messages to deliver orders to nationwide SEC-registered alternative trading systems and a national futures exchange.

62. As a result of the foregoing conduct, Lebental willfully violated Section 10(b) of the Exchange Act and Exchange Act Rule 10b-5, and violated FINRA Rules 2020 and 2010.

SECOND CAUSE OF ACTION
Fraudulent or Deceptive Practice or Scheme
(Violation of FINRA Rule 2010 by Virtue of Acting in
Contravention of Securities Act Section 17(a)(1) and Section 17(a)(3))

63. The Department of Enforcement realleges and incorporates by reference all preceding paragraphs.

64. Section 17(a)(1) of the Securities Act, entitled “Use of interstate commerce for purpose of fraud or deceit,” states:

It shall be unlawful for any person in the offer or sale of any securities . . . by the use of any means or instruments of transportation or communication in interstate commerce or by use of the mails, directly or indirectly . . . (1) to employ any device, scheme, or artifice to defraud[.]

65. Section 17(a)(3) of the Securities Act prohibits, in the offer or sale of any securities, using interstate commerce to “engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon the purchaser.”

66. Conduct that contravenes either Section 17(a)(1) or Section 17(a)(3) of the Securities Act violates FINRA Rule 2010.

67. During the Relevant Period, Lebental, in connection with his trading scheme involving U.S. Treasury securities and futures, (a) intentionally or recklessly employed devices, schemes, or artifices to defraud; and (b) intentionally, recklessly, or negligently engaged in transactions, practices, and courses of business which operated or would operate as a fraud upon purchasers of securities.

68. Lebental used interstate electronic messages to deliver orders to nationwide SEC-registered alternative trading systems and a national futures exchange.

69. Lebental's conduct violated Section 17(a)(1) and Section 17(a)(3) of the Securities Act.

70. As a result of the foregoing, Lebental violated FINRA Rule 2010 by acting in contravention of Securities Act Section 17(a)(1) and Section 17(a)(3).

THIRD CAUSE OF ACTION
Causing Publication of Non-Bona Fide Transactions and Quotations
(Violations of FINRA Rules 5210 and 2010)

71. The Department of Enforcement realleges and incorporates by reference all preceding paragraphs.

72. FINRA Rule 5210 provides:

[n]o member shall publish or circulate, or cause to be published or circulated, any notice, circular, advertisement, newspaper article, investment service, or communication of any kind which purports to report any transaction as a purchase or sale of any security unless such member believes that such transaction was a bona fide purchase or sale of such security; or which purports to quote the bid price or asked price for any security, unless such member believes that such quotation represents a bona fide bid for, or offer of, such security.

73. As explained in Supplementary Material 5210.01, "it shall be deemed inconsistent with Rules 2010, 2020 and 5210 for a member, for itself or for any other person, to publish or circulate or to cause to be published or circulated, by any means whatsoever, any quotation for any security without having reasonable cause to believe that such quotation is a bona fide quotation, is not fictitious and is not published or circulated or caused to be published or circulated for any fraudulent, deceptive or manipulative purpose." A violation of FINRA Rule 5210 constitutes a violation of FINRA Rule 2010.

74. Lebental placed 523 non-bona fide securities orders into at least one of the three Trading Venues (A, B, or C), causing those venues to publish or circulate non-bona fide quotations.

75. Lebental did not have reasonable cause to believe that the quotations resulting from his 523 orders in the 30-year Bond were bona fide, were not fictitious and were not published or circulated or caused to be published or circulated for any fraudulent, deceptive or manipulative purpose.

76. As a result of the foregoing, Lebental caused the publication of non-bona fide quotations, in violation of FINRA Rules 5210 and 2010.

**FOURTH CAUSE OF ACTION
Unethical Conduct
(Violation of FINRA Rule 2010)**

77. The Department of Enforcement realleges and incorporates by reference all preceding paragraphs.

78. FINRA Rule 2010 establishes a broad ethical mandate for persons engaged in the securities industry. Even in the absence of a violation of another FINRA rule or securities law, a person violates Rule 2010 if he or she acts unethically or in bad faith.

79. By placing and immediately cancelling 523 large, fully displayed non-bona fide orders in the 30-year Bond, Lebental injected false information into the marketplace, which induced executions of his orders on the opposite side of the market in the 30-year Bond or correlated Ultra T-Bond, and thereby acted in bad faith and unethically.

80. As a result of the foregoing conduct, Lebental violated FINRA Rule 2010.

RELIEF REQUESTED

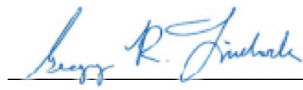
WHEREFORE, the Department of Enforcement respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein;

- B. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed;
- C. order that Respondent bears such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330; and
- D. make specific findings that Respondent willfully violated Exchange Act Section 10(b) and Rule 10b-5.

FINRA DEPARTMENT OF ENFORCEMENT

Date: May 23, 2023



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Exhibit A to Complaint

Dep't of Enforcement v. Sidney Lebental

Discip. Proc. No. 2019063152202

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
1	10/20/2014	50	103.328125	1.524000000	0%	Buy	Sell	Yes	Cash	10	10
2	10/20/2014	50	103.234375	1.549000064	0%	Buy	Sell	Yes	Cash	10	6
3	10/21/2014	50	102.546875	1.003999936	0%	Buy	Sell	Yes	Cash	20	5
4	10/24/2014	50	101.71875	1.329000064	0%	Sell	Buy	Yes	Cash	10	3
5	10/31/2014	50	101.078125	0.929000064	0%	Sell	Buy	Yes	Cash	12	2
6	11/06/2014	25	100.75	1.095000000	0%	Sell	Buy	No	Cash	2	1
7	11/10/2014	50	101.640625	0.787999872	0%	Sell	Buy	Yes	Cash	10	5
8	11/10/2014	50	100.609375	1.133000000	0%	Buy	Sell	Yes	Cash	7	1
9	11/12/2014	100	100.703125	0.909999936	0%	Buy	Sell	Yes	Cash	40	9
10	11/13/2014	50	100.890625	0.900999872	0%	Sell	Buy	Yes	Cash	15	15
11	11/18/2014	50	99.140625	1.005999936	0%	Buy	Sell	Yes	Futures	200	9
12	11/19/2014	50	98.703125	0.888000000	0%	Buy	Sell	Yes	Cash	30	14
13	11/19/2014	50	98.703125	0.765000000	0%	Buy	Sell	Yes	Cash	30	1
14	11/19/2014	50	98.703125	0.809000000	0%	Buy	Sell	Yes	Cash	30	9
15	11/24/2014	50	99.25	0.833999936	2%	Sell	Buy	Yes	Cash	25	4
16	11/24/2014	50	99.765625	0.757999936	0%	Buy	Sell	Yes	Cash	27	10
17	11/26/2014	50	101.15625	0.813999936	0%	Sell	Buy	Yes	Cash	20	5
18	11/28/2014	50	101.5625	0.973000128	0%	Buy	Sell	Yes	Cash	20	4
19	11/28/2014	50	101.5625	1.091000128	0%	Buy	Sell	Yes	Cash	20	1
20	11/28/2014	50	101.765625	1.233000128	0%	Buy	Sell	Yes	Cash	25	6
21	12/04/2014	50	100.625	1.257000064	0%	Buy	Sell	Yes	Cash	10	4
22	12/15/2014	50	104.75	1.077999872	12%	Buy	Sell	Yes	Cash	25	12
23	12/15/2014	50	104.765625	0.916000000	0%	Buy	Sell	Yes	Cash	25	8
24	12/15/2014	50	105.203125	0.688000064	0%	Buy	Sell	Yes	Cash	10	10

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

Key: NBF = non-bona fide order; BF = bona fide order.

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No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
25	12/15/2014	50	105.25	0.880999936	0%	Buy	Sell	Yes	Cash	20	7
26	12/15/2014	50	105.0625	0.775999936	0%	Sell	Buy	Yes	Cash	12	5
27	12/18/2014	50	104.71875	0.730000128	0%	Buy	Sell	Yes	Cash	25	15
28	12/18/2014	50	103.640625	0.767999872	0%	Buy	Sell	Yes	Cash	10	4
29	12/19/2014	100	103.234375	0.780000128	0%	Buy	Sell	Yes	Cash	5	2
30	12/22/2014	50	104.59375	0.723000000	0%	Sell	Buy	Yes	Cash	10	8
31	12/22/2014	100	104.625	0.958000000	2%	Buy	Sell	Yes	Cash	20	6
32	12/22/2014	100	104.578125	0.879999936	0%	Buy	Sell	Yes	Cash	20	6
33	12/22/2014	100	104.4375	0.727999872	0%	Buy	Sell	Yes	Cash	10	2
34	12/22/2014	100	104.421875	0.773999936	0%	Buy	Sell	Yes	Cash	10	2
35	12/22/2014	100	104.421875	1.006999936	0%	Buy	Sell	Yes	Cash	10	1
36	12/22/2014	50	104.625	0.887000064	0%	Sell	Buy	Yes	Cash	12	4
37	12/22/2014	100	105.078125	1.069000000	0%	Sell	Buy	Yes	Cash	25	13
38	12/23/2014	50	104.828125	0.878999872	0%	Sell	Buy	Yes	Cash	10	5
39	12/24/2014	50	102.546875	0.744999872	0%	Buy	Sell	Yes	Cash	8	3
40	12/26/2014	25	103.921875	0.819000064	0%	Sell	Buy	Yes	Cash	10	8
41	12/26/2014	25	103.84375	1.425000064	0%	Buy	Sell	Yes	Futures	20	20
42	12/26/2014	25	103.828125	1.068000000	0%	Buy	Sell	Yes	Cash	10	6
43	12/26/2014	25	103.65625	0.818999936	0%	Buy	Sell	Yes	Cash	5	3
44	12/26/2014	50	103.703125	0.749000128	0%	Sell	Buy	Yes	Cash	8	5
45	12/30/2014	25	104.703125	0.745999936	0%	Buy	Sell	No	Cash	1	1
46	12/30/2014	50	105.015625	0.853000128	0%	Buy	Sell	Yes	Cash	2	2
47	12/30/2014	50	105.125	1.008000064	0%	Sell	Buy	No	Cash	1	1
48	12/30/2014	50	105.171875	0.798999936	0%	Sell	Buy	Yes	Cash	25	10
49	12/30/2014	50	105.171875	0.798000128	0%	Sell	Buy	Yes	Cash	20	1

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
50	12/30/2014	50	105.21875	0.667000000	0%	Sell	Buy	Yes	Cash	19	7
51	12/30/2014	50	105.21875	0.579999872	0%	Sell	Buy	Yes	Cash	5	5
52	12/30/2014	50	105.296875	0.901999872	0%	Sell	Buy	Yes	Cash	10	10
53	12/30/2014	50	105.203125	0.844999936	0%	Sell	Buy	Yes	Cash	25	5
54	12/31/2014	50	105.03125	0.806000128	0%	Sell	Buy	Yes	Cash	20	3
55	12/31/2014	50	105.046875	0.817999936	0%	Buy	Sell	Yes	Cash	20	3
56	12/31/2014	50	105.109375	0.828999936	0%	Buy	Sell	Yes	Cash	7	4
57	12/31/2014	50	105.125	0.830999872	0%	Buy	Sell	Yes	Cash	25	3
58	12/31/2014	50	105.109375	0.695000128	0%	Buy	Sell	Yes	Cash	22	1
59	01/02/2015	50	106.21875	0.814999872	0%	Buy	Sell	Yes	Cash	10	9
60	01/02/2015	50	106.28125	0.743999936	0%	Sell	Buy	Yes	Cash	5	4
61	01/05/2015	50	106.734375	0.571999872	0%	Sell	Buy	Yes	Cash	5	5
62	01/07/2015	50	109.59375	0.764000000	0%	Buy	Sell	Yes	Cash	25	8
63	01/07/2015	50	110.015625	0.780000064	0%	Buy	Sell	Yes	Cash	9	4
64	01/07/2015	50	110	0.872999936	0%	Sell	Buy	Yes	Cash	25	2
65	01/07/2015	50	110	0.728000128	14%	Sell	Buy	Yes	Cash	25	5
66	01/08/2015	50	108.34375	1.014000128	0%	Buy	Sell	Yes	Futures	250	88
67	01/09/2015	50	109.15625	0.861000064	0%	Sell	Buy	Yes	Cash	25	6
68	01/09/2015	100	109.109375	0.826000064	0%	Buy	Sell	Yes	Cash	26	8
69	01/09/2015	100	109.109375	0.752000064	0%	Buy	Sell	Yes	Cash	26	15
70	01/12/2015	50	109.90625	0.791999936	0%	Sell	Buy	Yes	Cash	8	3
71	01/12/2015	50	110.546875	0.862000128	0%	Buy	Sell	Yes	Futures	50	14
72	01/12/2015	50	110.703125	0.732999872	0%	Sell	Buy	Yes	Cash	10	7
73	01/12/2015	50	110.734375	0.732999936	0%	Sell	Buy	Yes	Cash	15	6
74	01/13/2015	50	109.90625	0.717999872	0%	Buy	Sell	Yes	Cash	5	5

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

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No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
75	01/13/2015	50	109.96875	1.005999872	0%	Buy	Sell	No	Cash	1	1
							Sell	No	Cash	1	1
76	01/13/2015	50	110	0.885999936	0%	Buy	Sell	Yes	Cash	12	3
77	01/13/2015	100	110.140625	0.769999872	0%	Buy	Sell	Yes	Cash	5	5
78	01/13/2015	100	110.171875	0.948999872	1%	Buy	Sell	Yes	Cash	10	9
79	01/13/2015	100	110.171875	0.832999936	11%	Buy	Sell	Yes	Cash	11	7
80	01/13/2015	50	110.1875	0.718000000	0%	Buy	Sell	Yes	Cash	5	2
81	01/13/2015	100	110.21875	0.724999872	0%	Buy	Sell	Yes	Cash	5	5
82	01/13/2015	50	110.828125	0.860999872	0%	Buy	Sell	Yes	Cash	10	2
83	01/14/2015	100	111.984375	0.877000000	0%	Buy	Sell	Yes	Cash	27	11
84	01/14/2015	50	112.203125	0.878000000	0%	Buy	Sell	Yes	Cash	10	1
85	01/14/2015	100	111.390625	0.769999936	0%	Buy	Sell	Yes	Cash	12	6
86	01/15/2015	100	111.40625	1.005999936	0%	Sell	Buy	Yes	Cash	25	1
87	01/15/2015	100	111.390625	0.778000000	0%	Sell	Buy	Yes	Cash	27	5
88	01/15/2015	50	111.3125	0.826000064	0%	Buy	Sell	Yes	Cash	10	10
89	01/15/2015	100	112.609375	0.766999872	1%	Buy	Sell	Yes	Cash	22	22
90	01/15/2015	100	112.625	0.819000128	0%	Sell	Buy	Yes	Cash	25	13
91	01/15/2015	100	112.609375	0.581999936	2%	Sell	Buy	Yes	Cash	10	4
92	01/16/2015	100	112.34375	0.931999872	0%	Buy	Sell	Yes	Cash	25	4
93	01/16/2015	50	112.078125	0.576999872	0%	Sell	Buy	Yes	Cash	5	2
94	01/16/2015	100	111.921875	0.828000000	3%	Buy	Sell	Yes	Cash	33	8
95	01/16/2015	100	111.578125	0.864000128	0%	Buy	Sell	Yes	Cash	5	5
96	01/16/2015	50	111.625	1.205999872	0%	Buy	Sell	Yes	Cash	5	5
							Sell	No	Cash	1	1
97	01/20/2015	100	113.234375	0.645999936	0%	Buy	Sell	Yes	Cash	10	10

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
98	01/21/2015	50	113.265625	0.793999936	0%	Sell	Buy	Yes	Cash	5	3
99	01/21/2015	50	113.34375	0.700999936	0%	Sell	Buy	Yes	Cash	10	1
100	01/21/2015	50	113.71875	0.733000128	0%	Sell	Buy	Yes	Cash	5	2
101	01/21/2015	50	113.625	0.674000000	0%	Sell	Buy	Yes	Cash	3	3
102	01/22/2015	50	111.296875	0.838000128	0%	Buy	Sell	Yes	Cash	25	9
103	01/23/2015	50	113.203125	1.110999936	0%	Sell	Buy	Yes	Cash	10	1
104	01/26/2015	50	113.203125	0.916000064	0%	Buy	Sell	Yes	Cash	20	20
105	01/26/2015	50	113.375	0.787000128	0%	Sell	Buy	Yes	Futures	100	23
106	01/26/2015	50	112.890625	0.783000128	0%	Buy	Sell	Yes	Cash	20	7
107	01/26/2015	50	113.40625	0.798999936	0%	Buy	Sell	Yes	Cash	20	2
108	01/26/2015	50	112.609375	0.830000128	0%	Sell	Buy	Yes	Cash	16	3
109	01/27/2015	50	113.828125	0.932999936	0%	Buy	Sell	Yes	Cash	50	12
110	01/27/2015	50	113.828125	0.684999936	0%	Buy	Sell	Yes	Cash	50	4
111	01/27/2015	50	112.71875	0.716000064	0%	Buy	Sell	Yes	Cash	10	7
112	01/29/2015	50	114.296875	1.175000000	0%	Buy	Sell	Yes	Cash	13	2
113	01/29/2015	25	114.515625	1.228999936	0%	Sell	Buy	Yes	Cash	9	1
114	01/29/2015	50	114.59375	0.772000000	0%	Sell	Buy	Yes	Cash	8	8
115	01/30/2015	50	116.1875	0.825999936	0%	Buy	Sell	Yes	Cash	25	2
116	02/02/2015	50	116.265625	0.691999872	0%	Sell	Buy	Yes	Cash	12	3
117	02/05/2015	50	112.140625	0.679000128	0%	Buy	Sell	Yes	Cash	10	2
118	02/05/2015	50	112.453125	0.758999936	0%	Buy	Sell	Yes	Cash	5	5
119	02/06/2015	50	110.921875	0.740000128	0%	Buy	Sell	Yes	Cash	18	4
120	02/09/2015	50	110.78125	0.992999936	0%	Sell	Buy	Yes	Cash	4	4
121	02/09/2015	50	110.546875	0.733999936	0%	Buy	Sell	Yes	Cash	20	2
122	02/10/2015	100	109.390625	1.061000000	5%	Buy	Sell	Yes	Cash	25	3

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
123	02/10/2015	50	109.140625	0.820000064	0%	Sell	Buy	Yes	Cash	20	20
124	02/11/2015	100	108.234375	1.135000000	1%	Buy	Sell	Yes	Cash	25	10
125	02/11/2015	50	108.234375	0.749000128	0%	Buy	Sell	Yes	Cash	25	1
126	02/12/2015	100	109.140625	0.856999936	0%	Buy	Sell	Yes	Cash	10	10
127	02/12/2015	50	109.09375	0.742999936	0%	Buy	Sell	No	Cash	5	2
128	02/12/2015	50	108.796875	0.764000064	0%	Buy	Sell	Yes	Cash	25	1
129	02/12/2015	100	108.8125	0.749000064	0%	Sell	Buy	Yes	Cash	25	1
130	02/12/2015	50	108.859375	0.790000064	0%	Sell	Buy	Yes	Cash	25	10
131	02/17/2015	50	97.203125	0.653000064	0%	Buy	Sell	Yes	Cash	5	5
132	02/17/2015	50	96.59375	1.109999872	0%	Buy	Sell	Yes	Cash	10	2
133	02/17/2015	50	96.640625	0.844000000	0%	Buy	Sell	Yes	Cash	5	5
134	02/17/2015	50	96.3125	0.804000064	0%	Buy	Sell	Yes	Cash	25	3
135	02/17/2015	100	95.640625	0.709000064	0%	Buy	Sell	Yes	Cash	50	9
136	02/17/2015	50	95.25	0.708999936	0%	Sell	Buy	Yes	Cash	10	5
137	02/18/2015	50	95.328125	0.696999872	0%	Sell	Buy	Yes	Cash	10	5
138	02/18/2015	100	95.40625	0.732999872	0%	Buy	Sell	Yes	Cash	20	20
139	02/18/2015	50	95.4375	0.920999936	0%	Buy	Sell	Yes	Cash	10	6
140	02/18/2015	50	95.765625	0.619999936	0%	Buy	Sell	Yes	Cash	5	5
141	02/18/2015	50	96.109375	0.645999872	0%	Sell	Buy	Yes	Cash	20	1
142	02/18/2015	50	95.65625	0.765000128	0%	Sell	Buy	Yes	Cash	25	2
143	02/19/2015	50	96.125	0.829000064	0%	Buy	Sell	Yes	Cash	7	3
144	02/23/2015	50	96.296875	0.828999872	0%	Sell	Buy	Yes	Cash	10	7
145	02/23/2015	50	96.28125	1.176000000	0%	Sell	Buy	Yes	Cash	5	2
146	02/23/2015	50	96.28125	0.661000000	0%	Sell	Buy	Yes	Cash	5	3
147	02/23/2015	50	96.59375	0.605000000	0%	Sell	Buy	Yes	Cash	10	9

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

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No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
148	02/25/2015	100	98.59375	0.701000064	1%	Buy	Sell	Yes	Cash	25	9
149	02/26/2015	50	98.359375	1.255000128	0%	Sell	Buy	Yes	Cash	21	14
150	02/26/2015	100	98.296875	0.764999872	0%	Buy	Sell	Yes	Cash	18	4
151	02/26/2015	100	98.25	0.732000000	0%	Buy	Sell	Yes	Cash	27	18
152	02/26/2015	50	97.765625	0.666999872	0%	Buy	Sell	Yes	Cash	20	2
153	02/27/2015	50	97.71875	0.941999872	0%	Buy	Sell	Yes	Cash	20	20
154	02/27/2015	50	97.265625	0.679000128	0%	Buy	Sell	Yes	Cash	5	2
155	02/27/2015	100	98.046875	0.823999936	0%	Buy	Sell	Yes	Cash	25	9
156	03/02/2015	100	96.734375	0.750000000	0%	Buy	Sell	Yes	Cash	5	5
157	03/02/2015	50	96.53125	0.918999936	0%	Buy	Sell	Yes	Cash	40	21
158	03/02/2015	50	96.125	0.969000128	0%	Buy	Sell	Yes	Cash	14	1
159	03/03/2015	50	96.125	0.740999936	0%	Sell	Buy	Yes	Cash	10	8
160	03/05/2015	50	95.609375	0.992000128	0%	Buy	Sell	Yes	Futures	100	25
161	03/10/2015	50	95.34375	0.653999872	0%	Sell	Buy	Yes	Cash	10	6
162	03/11/2015	50	95.140625	1.092000064	0%	Sell	Buy	Yes	Cash	20	4
163	03/11/2015	50	95.65625	1.216999936	0%	Sell	Buy	Yes	Cash	25	5
164	03/12/2015	50	96.875	0.622000064	0%	Sell	Buy	Yes	Cash	5	5
165	03/13/2015	50	95.703125	0.852000000	0%	Buy	Sell	Yes	Cash	25	2
166	03/16/2015	50	96.765625	1.725000128	0%	Sell	Buy	Yes	Cash	50	6
167	03/16/2015	50	96.78125	2.069999936	0%	Sell	Buy	Yes	Futures	50	3
							Buy	Yes	Cash	10	10
168	03/17/2015	50	97.578125	1.118000128	0%	Buy	Sell	Yes	Cash	25	9
169	03/17/2015	50	97.5	0.869999936	0%	Sell	Buy	Yes	Cash	25	8
170	03/17/2015	50	97.5	0.725999936	0%	Sell	Buy	Yes	Cash	10	10

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
171	03/18/2015	50	98.59375	2.427000000	0%	Sell	Buy	Yes	Cash	10	6
							Buy	Yes	Futures	25	19
172	03/18/2015	50	98.421875	0.734999936	0%	Sell	Buy	Yes	Cash	20	15
173	03/24/2015	50	100.6875	1.308000064	0%	Sell	Buy	Yes	Cash	15	2
174	03/24/2015	50	100.84375	2.611999872	0%	Sell	Buy	Yes	Cash	28	15
175	03/25/2015	50	101.09375	0.744999936	0%	Sell	Buy	Yes	Cash	8	8
176	03/25/2015	50	100.015625	1.327000128	0%	Sell	Buy	Yes	Cash	25	5
177	03/25/2015	50	99.96875	1.822000128	0%	Sell	Buy	Yes	Cash	15	7
178	03/26/2015	50	98.734375	1.219999936	0%	Sell	Buy	Yes	Cash	10	4
179	03/26/2015	50	98.75	1.653000000	0%	Sell	Buy	Yes	Cash	30	1
180	03/30/2015	50	99.359375	0.893000064	0%	Buy	Sell	Yes	Cash	16	10
181	03/30/2015	50	99.109375	1.988999872	0%	Sell	Buy	Yes	Cash	14	2
182	03/30/2015	50	98.875	2.335999872	0%	Sell	Buy	Yes	Cash	7	7
183	03/31/2015	50	99.203125	1.284000064	0%	Sell	Buy	Yes	Cash	20	2
184	03/31/2015	50	99.09375	1.035000000	0%	Buy	Sell	Yes	Cash	15	4
185	03/31/2015	50	99.28125	0.721999936	0%	Buy	Sell	Yes	Cash	5	5
186	04/14/2015	50	99.921875	2.487000128	4%	Sell	Buy	Yes	Cash	25	11
187	04/21/2015	75	98.625	1.166999872	0%	Buy	Sell	Yes	Cash	13	10
188	04/30/2015	50	94.046875	1.296000000	0%	Buy	Sell	Yes	Cash	27	10
189	05/05/2015	50	91.8125	1.070000128	0%	Sell	Buy	Yes	Futures	150	58
190	05/12/2015	142	89.671875	0.981000000	0%	Sell	Buy	No	Cash	50	8
191	05/14/2015	50	89.28125	1.577999872	0%	Sell	Buy	Yes	Cash	10	4
192	05/15/2015	50	101.546875	1.197999872	0%	Buy	Sell	Yes	Cash	75	3
193	05/20/2015	50	98.890625	1.333999872	0%	Buy	Sell	Yes	Cash	15	6
194	05/21/2015	25	99.796875	1.175000128	0%	Buy	Sell	Yes	Cash	50	1

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
195	05/21/2015	50	99.890625	1.398000128	0%	Buy	Sell	Yes	Cash	10	10
196	06/01/2015	50	102.265625	1.355000064	2%	Buy	Sell	No	Futures	50	24
197	07/01/2015	50	96.140625	1.165999936	0%	Sell	Buy	Yes	Futures	200	2
198	07/17/2015	50	98.171875	1.975000064	6%	Buy	Sell	Yes	Cash	10	4
199	08/03/2015	100	101.65625	0.669000128	2%	Sell	Buy	Yes	Futures	100	1
200	08/10/2015	50	102.078125	0.813999872	0%	Buy	Sell	Yes	Cash	25	5
201	08/11/2015	50	104	0.798999936	0%	Buy	Sell	Yes	Futures	50	10
202	08/20/2015	50	102.3125	0.964999872	0%	Sell	Buy	Yes	Cash	30	7
203	08/25/2015	25	101.171875	0.985000064	0%	Buy	Sell	Yes	Cash	50	27
204	08/25/2015	50	100.703125	0.878000064	0%	Buy	Sell	Yes	Cash	11	10
205	08/27/2015	50	98.96875	1.009999872	0%	Buy	Sell	Yes	Cash	35	9
206	08/28/2015	100	100.15625	0.677000128	0%	Buy	Sell	Yes	Cash	40	14
207	08/28/2015	100	99.390625	0.788000064	1%	Buy	Sell	Yes	Cash	25	14
208	08/28/2015	100	99.359375	0.662000000	0%	Buy	Sell	Yes	Cash	25	14
209	08/31/2015	60	99.46875	0.723999936	0%	Buy	Sell	Yes	Cash	23	5
210	08/31/2015	100	98.28125	0.836999936	0%	Buy	Sell	Yes	Cash	25	1
211	09/01/2015	60	99.328125	0.828000064	0%	Sell	Buy	Yes	Cash	32	4
212	09/01/2015	100	99.328125	0.704999936	0%	Sell	Buy	Yes	Cash	24	2
213	09/03/2015	50	98.640625	0.684999872	0%	Buy	Sell	Yes	Cash	13	12
214	09/03/2015	100	98.71875	0.850000128	7%	Buy	Sell	Yes	Cash	25	2
215	09/09/2015	100	97	0.765999872	0%	Buy	Sell	Yes	Cash	25	9
216	09/10/2015	50	97.9375	0.676999872	0%	Buy	Sell	Yes	Cash	25	4
217	09/17/2015	100	96.140625	0.620999872	0%	Buy	Sell	Yes	Cash	20	13
218	09/17/2015	100	96.03125	0.783000128	2%	Buy	Sell	Yes	Cash	40	19
219	09/17/2015	100	96.015625	0.646999872	0%	Buy	Sell	Yes	Cash	19	13

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
220	09/17/2015	100	96.015625	0.734000000	0%	Buy	Sell	Yes	Cash	30	6
221	09/18/2015	100	98.859375	0.904999872	0%	Sell	Buy	Yes	Cash	25	2
222	09/21/2015	100	97.171875	0.763999936	1%	Sell	Buy	Yes	Cash	45	11
223	09/21/2015	100	97.171875	0.678000128	0%	Sell	Buy	Yes	Cash	35	6
224	09/22/2015	100	99.015625	0.682000000	0%	Sell	Buy	Yes	Cash	25	4
225	09/25/2015	50	98.328125	1.326999872	0%	Sell	Buy	Yes	Futures	200	69
226	09/28/2015	100	99.90625	0.745000128	8%	Sell	Buy	Yes	Cash	50	21
227	09/28/2015	100	99.890625	0.677000064	0%	Sell	Buy	Yes	Cash	25	6
228	09/29/2015	100	100.375	0.605999872	0%	Sell	Buy	Yes	Cash	17	11
229	09/30/2015	100	99.953125	0.725000064	0%	Sell	Buy	Yes	Cash	15	12
230	10/20/2015	100	99.125	0.662000128	0%	Sell	Buy	Yes	Cash	50	6
231	10/21/2015	100	100.1875	0.766000064	0%	Sell	Buy	Yes	Cash	25	18
232	10/21/2015	100	100.140625	0.717999872	0%	Sell	Buy	Yes	Futures	200	24
233	10/21/2015	50	100.140625	0.595999936	0%	Sell	Buy	Yes	Futures	200	42
234	10/22/2015	100	100.109375	0.750000128	0%	Sell	Buy	Yes	Cash	35	2
235	10/22/2015	100	100.15625	0.692000128	0%	Sell	Buy	Yes	Futures	300	1
236	10/22/2015	100	100.15625	0.746000128	0%	Sell	Buy	Yes	Futures	300	1
237	10/27/2015	100	100.515625	0.700999936	0%	Sell	Buy	Yes	Futures	150	1
							Buy	Yes	Cash	25	24
238	10/27/2015	100	100.53125	0.606000064	0%	Sell	Buy	Yes	Cash	25	9
239	10/29/2015	50	98.625	0.689999872	0%	Sell	Buy	Yes	Futures	100	7
240	11/12/2015	100	95.734375	0.676000000	0%	Buy	Sell	Yes	Cash	25	10
241	11/12/2015	100	95.796875	0.659999872	0%	Buy	Sell	Yes	Cash	25	2
242	11/18/2015	50	99.15625	1.309000128	0%	Buy	Sell	Yes	Cash	15	2
243	12/17/2015	100	100.609375	0.670999872	0%	Buy	Sell	Yes	Cash	25	16

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
244	12/18/2015	100	101.484375	0.637999872	1%	Sell	Buy	Yes	Cash	23	3
245	12/21/2015	25	101.5625	1.160000128	0%	Sell	Buy	Yes	Cash	10	5
246	12/21/2015	50	101.625	1.006000064	0%	Sell	Buy	Yes	Futures	100	20
247	12/22/2015	50	100.9375	0.678999872	0%	Sell	Buy	Yes	Cash	40	3
248	12/24/2015	50	100.734375	1.012000000	4%	Sell	Buy	No	Futures	50	2
249	12/28/2015	50	101.1875	0.871000000	2%	Sell	Buy	Yes	Cash	12	2
250	12/28/2015	50	101.0625	1.012999872	6%	Sell	Buy	Yes	Cash	9	2
251	12/30/2015	50	98.828125	0.657999936	0%	Buy	Sell	Yes	Cash	10	10
252	12/31/2015	50	99.609375	1.405000128	0%	Buy	Sell	Yes	Cash	5	5
253	12/31/2015	100	99.59375	0.679000128	0%	Buy	Sell	Yes	Cash	12	8
254	12/31/2015	50	99.765625	0.620000064	0%	Buy	Sell	Yes	Cash	10	6
255	12/31/2015	100	99.640625	0.948999872	1%	Buy	Sell	Yes	Cash	25	5
256	01/05/2016	50	99.6875	0.709000128	0%	Buy	Sell	Yes	Cash	7	7
257	01/06/2016	100	101.140625	1.024999872	1%	Buy	Sell	Yes	Cash	28	1
258	01/06/2016	100	101.015625	0.755999936	0%	Buy	Sell	Yes	Cash	26	2
259	01/07/2016	25	101.59375	0.641999936	0%	Sell	Buy	Yes	Cash	10	10
260	01/12/2016	100	102.296875	0.662999936	1%	Sell	Buy	Yes	Cash	14	11
261	01/13/2016	100	102.46875	0.674999936	0%	Buy	Sell	Yes	Cash	25	5
262	01/13/2016	50	102.46875	0.725000000	0%	Buy	Sell	Yes	Cash	25	15
263	01/13/2016	100	102.453125	0.716000128	1%	Buy	Sell	Yes	Cash	15	6
264	01/14/2016	100	102.5625	0.750000128	0%	Buy	Sell	Yes	Cash	25	2
265	01/15/2016	100	103.671875	0.603999872	0%	Buy	Sell	Yes	Cash	25	12
266	01/15/2016	50	103.765625	0.653000064	0%	Buy	Sell	Yes	Cash	10	8
267	01/20/2016	100	105.484375	0.681000000	0%	Buy	Sell	Yes	Cash	50	5
268	01/20/2016	100	105.484375	0.807000000	1%	Buy	Sell	Yes	Cash	25	1

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
269	01/20/2016	100	105.640625	0.696000128	0%	Buy	Sell	Yes	Cash	25	15
270	01/22/2016	100	103.359375	0.715999936	1%	Buy	Sell	Yes	Cash	14	4
271	01/22/2016	100	103.234375	0.821000064	0%	Buy	Sell	Yes	Cash	50	28
272	02/03/2016	100	107.5	0.717999936	0%	Sell	Buy	Yes	Cash	25	16
273	02/05/2016	100	105.765625	0.715000064	3%	Buy	Sell	Yes	Cash	15	15
274	02/05/2016	100	106.453125	0.660999936	1%	Sell	Buy	Yes	Cash	25	8
275	02/10/2016	100	109.484375	0.588000128	0%	Sell	Buy	Yes	Cash	50	5
276	02/10/2016	100	109.484375	0.734000000	3%	Sell	Buy	Yes	Cash	50	21
277	02/10/2016	100	109.859375	0.916000064	11%	Buy	Sell	Yes	Cash	25	10
278	02/16/2016	100	96.65625	1.006000128	0%	Sell	Buy	Yes	Cash	25	2
279	02/17/2016	100	96.40625	1.004000000	0%	Buy	Sell	Yes	Cash	25	5
280	02/18/2016	100	97.03125	0.793000064	0%	Buy	Sell	Yes	Cash	25	9
281	02/19/2016	100	97.5625	0.778000064	0%	Sell	Buy	Yes	Cash	25	9
282	02/19/2016	100	98.078125	0.837000000	1%	Buy	Sell	Yes	Cash	25	1
283	02/19/2016	50	97.6875	0.673999936	0%	Sell	Buy	Yes	Cash	10	1
284	02/22/2016	100	97.625	0.669999936	1%	Buy	Sell	Yes	Cash	30	8
285	02/22/2016	100	97.625	0.629000064	2%	Buy	Sell	Yes	Cash	30	22
286	02/22/2016	100	97.53125	0.668000000	0%	Sell	Buy	Yes	Cash	50	4
287	02/23/2016	100	97.296875	0.677000000	0%	Sell	Buy	Yes	Cash	25	8
288	03/03/2016	100	96.84375	0.773999936	3%	Buy	Sell	Yes	Cash	17	17
289	03/03/2016	100	96.640625	0.765000128	0%	Buy	Sell	Yes	Cash	13	8
290	03/03/2016	100	96.5625	0.613000000	7%	Sell	Buy	Yes	Cash	13	13
291	03/07/2016	50	95.53125	0.760000064	0%	Buy	Sell	Yes	Futures	107	15
292	03/09/2016	100	96.734375	0.648000064	0%	Sell	Buy	Yes	Cash	25	9
293	04/12/2016	100	98.28125	0.788000064	0%	Buy	Sell	Yes	Cash	30	6

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
294	04/14/2016	100	98.046875	0.748000000	0%	Buy	Sell	Yes	Cash	30	3
295	04/20/2016	50	98.296875	0.669000000	0%	Sell	Buy	Yes	Cash	25	18
296	04/20/2016	100	98.453125	0.716999872	1%	Buy	Sell	Yes	Cash	20	14
297	04/21/2016	100	95.921875	0.749000064	2%	Buy	Sell	Yes	Cash	50	32
298	04/22/2016	50	95.9375	0.998999936	0%	Sell	Buy	Yes	Futures	150	40
							Buy	Yes	Cash	15	15
299	04/25/2016	100	95.5	1.006999936	0%	Buy	Sell	Yes	Cash	15	2
300	05/05/2016	100	97.546875	0.731000128	1%	Sell	Buy	Yes	Cash	25	12
301	05/05/2016	100	97.984375	0.708999936	0%	Sell	Buy	Yes	Cash	14	6
302	05/06/2016	100	98.078125	0.696999936	1%	Sell	Buy	Yes	Cash	50	8
303	05/06/2016	100	97.59375	0.747000000	0%	Buy	Sell	Yes	Cash	50	17
304	05/10/2016	100	97.71875	0.794999936	0%	Buy	Sell	Yes	Cash	25	8
305	05/10/2016	100	97.671875	0.689000000	0%	Sell	Buy	Yes	Cash	50	11
306	05/10/2016	100	97.78125	0.913000064	4%	Sell	Buy	Yes	Cash	35	35
307	05/10/2016	100	97.65625	0.717999936	1%	Buy	Sell	Yes	Cash	35	6
							Sell	Yes	Futures	150	1
308	05/13/2016	50	98.75	1.006000064	0%	Sell	Buy	Yes	Futures	50	50
309	05/17/2016	100	98.375	0.669000000	0%	Buy	Sell	Yes	Cash	50	10
310	05/17/2016	100	98.421875	1.005000064	0%	Buy	Sell	Yes	Cash	35	5
311	05/17/2016	50	98.390625	1.005999936	0%	Sell	Buy	Yes	Futures	75	4
312	05/17/2016	25	98.390625	1.005000064	0%	Sell	Buy	Yes	Futures	75	3
313	05/17/2016	75	98.203125	1.867999872	1%	Sell	Buy	Yes	Futures	200	8
314	05/17/2016	50	98.203125	1.009000128	0%	Sell	Buy	Yes	Futures	200	1
315	05/18/2016	100	96.90625	0.979000064	5%	Buy	Sell	Yes	Cash	50	5
316	05/18/2016	50	97.03125	1.012999872	2%	Buy	Sell	Yes	Cash	20	6

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
317	05/20/2016	100	97	0.724000128	0%	Buy	Sell	Yes	Cash	25	12
318	05/24/2016	100	96.6875	1.005999936	0%	Buy	Sell	Yes	Cash	20	5
319	05/24/2016	100	96.546875	0.941000064	0%	Buy	Sell	No	Cash	5	1
320	06/01/2016	50	97.75	1.005999872	0%	Buy	Sell	Yes	Futures	150	1
321	06/01/2016	50	97.4375	0.659000000	0%	Sell	Buy	Yes	Cash	10	1
322	06/02/2016	50	98.40625	0.555000064	0%	Sell	Buy	Yes	Cash	15	2
323	06/07/2016	100	99.296875	0.736999936	0%	Buy	Sell	Yes	Cash	35	1
324	06/10/2016	50	101.0625	1.005999872	0%	Buy	Sell	Yes	Futures	200	21
325	06/20/2016	50	100.328125	0.779999936	0%	Buy	Sell	Yes	Futures	50	32
326	06/21/2016	50	100.28125	0.696000000	0%	Sell	Buy	Yes	Futures	174	47
327	06/23/2016	100	99.015625	0.787999936	2%	Sell	Buy	Yes	Cash	30	16
328	06/23/2016	50	99.15625	0.835000064	0%	Buy	Sell	Yes	Cash	30	3
329	06/28/2016	100	104.75	0.619000064	0%	Sell	Buy	Yes	Cash	50	10
330	06/30/2016	50	104.296875	1.131000064	0%	Buy	Sell	Yes	Cash	33	10
331	07/01/2016	50	105.1875	0.653999872	0%	Buy	Sell	Yes	Cash	9	2
332	07/05/2016	50	107.53125	0.739000064	0%	Sell	Buy	Yes	Cash	25	6
333	07/13/2016	50	106.765625	0.846000064	0%	Buy	Sell	Yes	Cash	15	3
334	07/14/2016	100	105.25	0.756999872	0%	Buy	Sell	Yes	Cash	29	8
335	07/25/2016	100	104.453125	1.050000000	1%	Sell	Buy	Yes	Cash	15	5
336	07/27/2016	50	105.375	0.986999872	0%	Sell	Buy	Yes	Futures	200	1
337	07/29/2016	50	106.234375	1.127999936	0%	Buy	Sell	Yes	Futures	250	56
338	08/08/2016	100	104.0625	0.745999872	0%	Sell	Buy	Yes	Futures	200	16
339	08/09/2016	100	105.359375	1.127000064	8%	Sell	Buy	Yes	Futures	300	65
340	08/09/2016	100	105.375	0.686000064	1%	Sell	Buy	Yes	Futures	500	3
341	08/09/2016	100	105.359375	0.639000064	0%	Sell	Buy	Yes	Cash	25	3

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
342	08/17/2016	50	99.5	1.020999936	0%	Buy	Sell	No	Futures	1	1
							Sell	No	Futures	1	1
							Sell	No	Futures	1	1
343	08/29/2016	100	100.109375	0.971999936	1%	Sell	Buy	Yes	Cash	15	3
344	09/01/2016	100	99.90625	0.626999936	0%	Buy	Sell	Yes	Cash	40	30
345	09/08/2016	100	98.921875	0.913000064	1%	Buy	Sell	Yes	Cash	25	8
346	09/09/2016	50	96.875	0.646000064	0%	Sell	Buy	Yes	Futures	70	15
347	09/09/2016	100	97.03125	0.792000128	10%	Sell	Buy	Yes	Cash	30	3
348	09/13/2016	100	95.359375	1.055999936	0%	Buy	Sell	Yes	Futures	150	12
349	09/13/2016	100	95.4375	1.003000064	1%	Buy	Sell	Yes	Futures	200	74
350	09/14/2016	100	96.125	0.837999872	0%	Buy	Sell	Yes	Futures	376	28
351	09/14/2016	300	96.09375	0.726000000	0%	Buy	Sell	Yes	Cash	30	15
352	09/14/2016	100	96.078125	0.750000000	0%	Buy	Sell	Yes	Cash	20	7
353	09/21/2016	100	96.09375	0.772000128	0%	Buy	Sell	Yes	Cash	25	15
354	09/26/2016	50	98.609375	2.452999936	14%	Buy	Sell	Yes	Futures	100	20
355	10/12/2016	50	94.1875	0.798000000	6%	Sell	Buy	Yes	Futures	300	36
356	10/12/2016	50	94.1875	0.844000128	0%	Sell	Buy	Yes	Futures	300	146
357	10/12/2016	50	94.71875	1.009000128	0%	Sell	Buy	Yes	Futures	100	14
358	10/13/2016	100	95.125	1.893000064	6%	Buy	Sell	Yes	Futures	100	45
359	10/20/2016	100	95.0625	1.009999872	0%	Buy	Sell	Yes	Cash	25	1
360	10/21/2016	50	94.8125	2.627000128	0%	Sell	Buy	Yes	Futures	150	150
361	10/26/2016	50	94.1875	0.824000064	0%	Buy	Sell	Yes	Cash	35	2
362	11/02/2016	50	93.15625	0.665999872	0%	Buy	Sell	No	Cash	1	1
363	11/09/2016	50	89.53125	0.852999936	0%	Buy	Sell	Yes	Futures	150	2
364	11/14/2016	50	97.6875	0.859000128	0%	Sell	Buy	Yes	Futures	150	61

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
365	11/16/2016	50	97.953125	0.919000000	0%	Buy	Sell	Yes	Cash	10	10
366	12/02/2016	50	96.609375	1.054000000	0%	Buy	Sell	Yes	Futures	150	26
367	12/05/2016	50	96.859375	0.753999872	0%	Sell	Buy	Yes	Futures	50	15
368	12/06/2016	50	96.25	0.677999936	0%	Sell	Buy	Yes	Futures	125	26
369	02/01/2017	50	95.5625	1.028999872	0%	Sell	Buy	Yes	Futures	300	1
370	02/02/2017	50	95.8125	0.918000064	0%	Buy	Sell	Yes	Futures	150	1
371	02/27/2017	100	100.671875	0.764999936	0%	Buy	Sell	Yes	Cash	50	6
372	03/03/2017	100	98.171875	1.004000064	0%	Buy	Sell	Yes	Futures	150	1
							Sell	Yes	Cash	50	10
373	03/08/2017	50	96.953125	0.907000128	0%	Sell	Buy	Yes	Futures	150	2
374	03/10/2017	100	96.28125	0.844000064	0%	Buy	Sell	Yes	Futures	150	95
375	03/10/2017	50	96.265625	0.779000000	2%	Buy	Sell	Yes	Cash	20	7
376	03/27/2017	50	100.71875	0.702999872	0%	Buy	Sell	Yes	Cash	50	8
377	04/06/2017	50	99.921875	1.183999872	0%	Buy	Sell	No	Futures	100	18
378	04/07/2017	50	100.578125	1.308000128	0%	Sell	Buy	Yes	Cash	20	5
379	04/17/2017	75	101.9375	1.438000064	0%	Sell	Buy	Yes	Futures	250	6
380	05/03/2017	100	100.484375	0.943999872	6%	Sell	Buy	Yes	Cash	30	3
381	05/19/2017	75	101.875	2.866999936	0%	Buy	Sell	Yes	Futures	340	1
382	05/19/2017	100	101.828125	0.694000064	0%	Sell	Buy	Yes	Cash	40	8
383	05/23/2017	50	101.375	0.764000000	0%	Sell	Buy	Yes	Futures	150	55
384	05/24/2017	100	101.109375	1.010000000	2%	Buy	Sell	Yes	Futures	500	28
							Sell	Yes	Cash	50	6
385	05/24/2017	100	101.109375	0.719999936	0%	Buy	Sell	Yes	Futures	500	1
							Sell	Yes	Cash	50	11

Source: BofA Securities, Inc. order data from its proprietary Pioneer trading system.

No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
386	05/24/2017	100	101.078125	0.630999872	1%	Buy	Sell	Yes	Futures	300	1
							Sell	Yes	Cash	75	7
387	06/01/2017	50	102.375	1.797000128	0%	Buy	Sell	Yes	Cash	30	2
388	06/20/2017	75	105.28125	2.060000064	0%	Sell	Buy	Yes	Futures	150	1
389	06/29/2017	100	103.34375	2.412000128	0%	Buy	Sell	Yes	Futures	150	3
390	06/29/2017	50	103.328125	1.070000064	0%	Buy	Sell	No	Futures	250	24
391	07/12/2017	50	102.0625	0.793000064	0%	Buy	Sell	Yes	Cash	25	2
392	07/25/2017	75	102.8125	0.883000064	0%	Buy	Sell	Yes	Futures	150	5
393	07/25/2017	50	101.984375	0.754000064	0%	Sell	Buy	Yes	Futures	150	139
394	10/12/2017	50	97.421875	1.103999872	0%	Buy	Sell	No	Cash	1	1
							Sell	No	Cash	1	1
395	11/17/2017	50	98.875	1.981000064	0%	Sell	Buy	Yes	Futures	50	2
396	11/22/2017	75	99.828125	0.853999872	0%	Buy	Sell	Yes	Futures	250	61
397	11/29/2017	25	98.671875	1.858999872	0%	Sell	Buy	Yes	Futures	250	249
398	12/12/2017	50	99.453125	0.947999872	0%	Buy	Sell	Yes	Futures	300	5
399	12/15/2017	50	100.796875	0.798000064	0%	Buy	Sell	Yes	Futures	100	1
400	12/15/2017	50	101.359375	0.675000128	0%	Sell	Buy	Yes	Futures	70	1
401	01/05/2018	50	98.78125	1.580000064	6%	Sell	Buy	Yes	Futures	300	2
402	01/23/2018	50	97.34375	0.971999936	0%	Buy	Sell	Yes	Futures	180	3
403	02/01/2018	75	95.265625	1.234999936	1%	Buy	Sell	Yes	Futures	465	1
404	02/01/2018	75	95.265625	0.911000064	0%	Buy	Sell	Yes	Futures	465	1
405	02/05/2018	75	93.25	1.682999872	0%	Sell	Buy	Yes	Futures	150	2
406	03/06/2018	50	97.359375	1.200999936	0%	Buy	Sell	Yes	Futures	100	1
407	05/02/2018	50	97.09375	0.691000128	0%	Sell	Buy	Yes	Futures	266	49
408	06/12/2018	75	100.40625	1.709000000	0%	Buy	Sell	Yes	Futures	300	15

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No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
409	08/01/2018	50	100.234375	0.749999872	0%	Buy	Sell	Yes	Futures	500	1
410	08/09/2018	100	100.578125	0.835999872	0%	Buy	Sell	Yes	Futures	500	125
411	08/28/2018	75	99.390625	1.011000128	0%	Buy	Sell	Yes	Futures	200	1
412	10/02/2018	75	95.921875	1.526999872	0%	Buy	Sell	Yes	Futures	300	48
413	10/05/2018	75	92.71875	0.783999872	0%	Buy	Sell	Yes	Futures	200	52
414	10/05/2018	75	92.546875	0.755000000	0%	Buy	Sell	Yes	Futures	300	76
415	10/09/2018	50	93.046875	0.997000128	0%	Sell	Buy	Yes	Futures	300	90
416	10/09/2018	75	93.046875	0.741000000	0%	Sell	Buy	Yes	Futures	100	59
417	10/09/2018	150	93	1.021000128	0%	Buy	Sell	Yes	Futures	300	1
418	10/10/2018	75	92.65625	1.047000128	0%	Buy	Sell	Yes	Futures	100	5
419	10/10/2018	75	92.6875	0.742000128	0%	Buy	Sell	Yes	Futures	30	29
420	11/07/2018	50	92.4375	1.536000128	0%	Buy	Sell	Yes	Futures	500	1
421	11/15/2018	100	100.3125	0.766999872	0%	Buy	Sell	Yes	Futures	120	9
422	11/20/2018	75	101.34375	0.668000128	0%	Buy	Sell	No	Futures	25	25
423	11/29/2018	75	100.875	0.829000128	0%	Buy	Sell	Yes	Futures	300	135
424	11/30/2018	75	101.0625	1.667999872	0%	Buy	Sell	Yes	Futures	200	7
425	12/04/2018	75	103.890625	1.876999872	0%	Buy	Sell	Yes	Futures	350	2
426	12/04/2018	60	103.890625	1.044999872	0%	Buy	Sell	Yes	Futures	350	65
427	12/12/2018	75	104.390625	1.477000000	0%	Buy	Sell	Yes	Futures	50	4
428	12/12/2018	75	104.328125	2.611000128	0%	Buy	Sell	Yes	Futures	200	10
429	12/12/2018	80	104.328125	1.475000000	0%	Buy	Sell	Yes	Futures	200	3
430	12/12/2018	75	104.328125	1.019000000	0%	Buy	Sell	Yes	Futures	200	25
431	12/13/2018	50	104.234375	0.980999872	0%	Buy	Sell	Yes	Futures	500	24
432	12/13/2018	75	104.1875	0.842999872	0%	Buy	Sell	Yes	Futures	150	34
433	12/13/2018	25	104.125	0.852000000	0%	Buy	Sell	Yes	Futures	150	1

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No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
434	01/07/2019	75	108.390625	0.829000000	0%	Buy	Sell	Yes	Futures	100	4
435	01/10/2019	50	106.78125	1.156000000	0%	Sell	Buy	Yes	Futures	300	86
436	01/15/2019	25	106.546875	1.660000128	12%	Buy	Sell	No	Futures	100	100
437	01/15/2019	75	105.921875	2.066000128	0%	Buy	Sell	Yes	Futures	100	16
							Sell	Yes	Futures	25	3
438	01/16/2019	75	105.515625	1.018999872	0%	Buy	Sell	Yes	Futures	120	29
439	01/16/2019	75	105.515625	0.924999872	0%	Buy	Sell	Yes	Futures	120	68
440	01/16/2019	75	105.84375	0.980000128	0%	Sell	Buy	Yes	Futures	125	2
441	01/16/2019	75	105.90625	1.037000128	0%	Sell	Buy	Yes	Futures	200	40
442	01/16/2019	100	105.96875	1.201000128	6%	Sell	Buy	Yes	Futures	200	200
443	01/16/2019	50	105.90625	1.044000000	2%	Sell	Buy	Yes	Futures	100	74
444	01/18/2019	75	105.75	2.164000128	0%	Buy	Sell	Yes	Futures	350	6
445	01/18/2019	50	105.296875	1.044000000	0%	Buy	Sell	Yes	Futures	100	25
446	01/18/2019	75	105.265625	1.063999872	0%	Buy	Sell	Yes	Futures	100	50
447	02/12/2019	50	99.65625	2.997000000	0%	Sell	Buy	Yes	Futures	82	35
448	02/12/2019	50	99.5625	1.098999872	0%	Buy	Sell	Yes	Futures	75	16
449	02/20/2019	75	100.09375	0.597000128	0%	Sell	Buy	Yes	Futures	34	34
450	03/05/2019	100	98.203125	1.189999872	0%	Sell	Buy	Yes	Futures	344	1
451	03/05/2019	75	98.359375	0.568000128	0%	Sell	Buy	Yes	Futures	700	19
452	03/05/2019	75	98.359375	0.748000128	0%	Sell	Buy	Yes	Futures	700	195
453	03/05/2019	75	98.34375	0.799000128	0%	Sell	Buy	Yes	Futures	100	37
454	03/05/2019	75	98.359375	0.765999872	0%	Sell	Buy	Yes	Futures	100	1
455	03/05/2019	75	98.359375	0.659000128	0%	Sell	Buy	Yes	Futures	100	11
456	03/19/2019	75	99.546875	0.892000000	0%	Buy	Sell	Yes	Futures	100	100
457	03/19/2019	75	99.578125	0.808999872	0%	Buy	Sell	Yes	Futures	100	20

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No.	Date	NBF size	NBF price	NBF Life Span (seconds)	NBF Fill Before Cancel	NBF side	BF side	Partially Displayed (Iceberg)?	BF security type	BF size	External BF Fills during NBF life
458	03/19/2019	50	99.515625	1.218000000	0%	Sell	Buy	Yes	Futures	200	166
459	03/19/2019	50	99.515625	0.894000000	0%	Sell	Buy	Yes	Futures	100	61
460	03/20/2019	75	99.859375	0.918000000	0%	Buy	Sell	Yes	Futures	100	63
							Sell	Yes	Futures	100	18
461	03/21/2019	75	100.671875	0.784000128	0%	Buy	Sell	Yes	Futures	172	22
462	03/22/2019	75	102.75	0.780000000	0%	Sell	Buy	Yes	Futures	50	1
463	03/22/2019	75	102.4375	0.804000000	0%	Sell	Buy	Yes	Futures	25	1
464	03/27/2019	75	103.359375	0.652000000	0%	Buy	Sell	Yes	Futures	150	97
							Sell	Yes	Futures	100	4
465	03/28/2019	100	103.609375	1.079999872	0%	Buy	Sell	Yes	Futures	345	17
466	03/28/2019	100	103.609375	0.862000128	0%	Buy	Sell	Yes	Futures	345	79
467	03/28/2019	100	103.609375	0.765000000	0%	Buy	Sell	Yes	Futures	345	4
468	03/28/2019	100	103.609375	0.806999872	0%	Buy	Sell	Yes	Futures	345	17
469	03/28/2019	100	103.609375	0.815000000	0%	Buy	Sell	Yes	Futures	345	1
470	03/28/2019	100	103.625	0.747000000	0%	Buy	Sell	Yes	Futures	170	53
471	03/28/2019	100	103.71875	0.751000000	0%	Buy	Sell	Yes	Futures	350	47
472	03/28/2019	100	103.703125	0.607000128	0%	Buy	Sell	Yes	Futures	150	45
473	03/28/2019	50	103.9375	0.774000000	0%	Buy	Sell	Yes	Futures	30	30
474	03/28/2019	100	103.921875	0.720000000	0%	Buy	Sell	Yes	Futures	150	62
475	03/28/2019	100	103.90625	1.422000000	0%	Buy	Sell	Yes	Futures	150	1
476	04/11/2019	75	101.21875	1.646000128	0%	Buy	Sell	Yes	Futures	200	52
477	04/11/2019	75	101.21875	0.945000000	0%	Buy	Sell	Yes	Futures	200	1
478	04/11/2019	75	101.21875	0.840999872	0%	Buy	Sell	Yes	Futures	200	1
479	04/11/2019	75	101.21875	0.993000128	0%	Buy	Sell	Yes	Futures	200	58
480	04/22/2019	75	100.21875	0.820999872	0%	Buy	Sell	Yes	Futures	100	1

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481	04/22/2019	75	100.21875	1.236999872	0%	Buy	Sell	Yes	Futures	200	83
482	04/22/2019	75	100.21875	0.980000128	0%	Buy	Sell	Yes	Futures	200	115
483	04/22/2019	75	100.203125	1.022000128	0%	Buy	Sell	Yes	Futures	100	9
484	04/23/2019	50	100.125	0.971000000	0%	Buy	Sell	Yes	Futures	20	3
485	04/23/2019	50	100.109375	0.852000000	0%	Buy	Sell	Yes	Futures	30	30
486	04/23/2019	50	100.125	0.834999872	0%	Buy	Sell	Yes	Futures	20	3
487	04/23/2019	50	100.125	0.941000000	10%	Buy	Sell	No	Futures	5	5
488	04/23/2019	50	100.125	1.160000000	0%	Buy	Sell	Yes	Futures	10	1
489	04/23/2019	100	100.125	0.811999872	13%	Buy	Sell	Yes	Futures	150	4
490	04/23/2019	100	100.125	0.838999872	2%	Buy	Sell	Yes	Futures	150	2
							Sell	Yes	Futures	70	1
491	04/23/2019	100	100.125	0.955000000	0%	Buy	Sell	Yes	Futures	150	41
							Sell	Yes	Futures	70	2
492	04/23/2019	100	100.125	0.797000128	0%	Buy	Sell	Yes	Futures	150	1
							Sell	Yes	Futures	70	1
493	04/24/2019	25	101.03125	1.206000128	0%	Buy	Sell	Yes	Futures	100	38
494	04/24/2019	100	101.046875	0.806000128	0%	Buy	Sell	Yes	Futures	30	30
495	05/06/2019	75	101.890625	0.836999872	0%	Buy	Sell	Yes	Futures	50	1
496	05/06/2019	75	101.8125	0.869000128	0%	Buy	Sell	Yes	Futures	100	41
497	05/06/2019	75	101.8125	1.279000128	1%	Buy	Sell	Yes	Futures	100	1
498	05/09/2019	50	102.5625	0.962000000	10%	Sell	Buy	Yes	Futures	50	1
499	05/09/2019	75	102.5625	0.887000128	0%	Sell	Buy	Yes	Futures	50	1
500	05/09/2019	75	102.640625	1.225999872	0%	Sell	Buy	Yes	Futures	19	12
							Buy	Yes	Futures	50	27
501	05/09/2019	100	102.65625	0.969000128	0%	Sell	Buy	Yes	Futures	150	79

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502	05/10/2019	75	99.796875	1.201000128	0%	Sell	Buy	Yes	Futures	250	1
503	06/18/2019	50	107.28125	0.741999872	0%	Buy	Sell	Yes	Futures	100	43
504	06/18/2019	50	107.265625	0.809000128	0%	Buy	Sell	Yes	Futures	100	4
505	07/31/2019	50	106.625	1.678000000	0%	Sell	Buy	Yes	Futures	150	1
506	08/09/2019	50	100.421875	0.974999872	0%	Sell	Buy	Yes	Futures	300	32
507	09/20/2019	50	101.0625	1.097000128	0%	Buy	Sell	Yes	Futures	200	43
508	09/20/2019	50	101.0625	0.901000000	0%	Buy	Sell	Yes	Futures	200	1
509	09/20/2019	50	101.046875	0.772999872	8%	Buy	Sell	Yes	Futures	100	72
510	09/20/2019	50	101.046875	1.526000128	0%	Buy	Sell	Yes	Futures	50	1
511	10/09/2019	50	103.6875	2.783999872	0%	Buy	Sell	Yes	Futures	100	69
512	10/09/2019	50	103.75	0.783000128	0%	Buy	Sell	Yes	Futures	100	22
513	10/09/2019	50	103.75	0.919999872	0%	Buy	Sell	Yes	Futures	100	11
							Sell	Yes	Futures	100	33
514	10/09/2019	50	103.75	0.892999872	0%	Buy	Sell	Yes	Futures	100	33
515	10/09/2019	50	103.75	0.966000000	0%	Buy	Sell	Yes	Futures	100	14
516	11/12/2019	50	99.125	0.926000128	0%	Buy	Sell	Yes	Futures	300	2
517	01/23/2020	50	104.390625	1.000000128	0%	Sell	Buy	Yes	Futures	100	3
518	01/23/2020	75	104.375	0.670000000	0%	Sell	Buy	Yes	Futures	100	11
							Buy	Yes	Futures	150	5
519	01/23/2020	50	104.375	0.700999872	0%	Sell	Buy	Yes	Futures	100	5
							Buy	Yes	Futures	150	5
520	04/01/2020	50	117.328125	0.961000128	0%	Buy	Sell	Yes	Futures	100	80
521	04/07/2020	50	116.96875	0.835000000	0%	Sell	Buy	Yes	Futures	50	30
522	05/07/2020	50	114.609375	1.105999872	2%	Buy	Sell	Yes	Futures	50	39
523	02/09/2021	50	93.0625	1.759999872	0%	Buy	Sell	Yes	Futures	100	1

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