

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. E072003019501**

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REGISTRATION & DISCLOSURE

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

RE: Newbridge Securities Corporation
FINRA Member
CRD No. 104065

Kenneth Brown
Registered Principal
CRD No. 1325762

Eric M. Vallejo
Registered Principal
CRD No. 1754908

Pursuant to NASD Rule 9216 of FINRA's Code of Procedure, Respondents Newbridge Securities Corporation, Kenneth Brown, and Eric M. Vallejo (collectively, "Respondents") 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 herein.

**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/RELEVANT DISCIPLINARY HISTORY

Newbridge Securities Corporation ("Newbridge") became a FINRA (f/k/a NASD) member on July 14, 2000, and currently is an FINRA member. Newbridge conducts a general securities business and is headquartered in Ft. Lauderdale, Florida.

In July 2005, Newbridge was censured and fined \$11,000 by FINRA for violations of NASD Conduct Rules 2110 and 2320. (Disc. Proc. No. CLG050103).

In March 2005, Newbridge was censured and fined \$57,500 by FINRA for violations of

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Securities Exchange Act ("SEA") Rules 17a-3, 10b-10, and 11Ac1-5(b), NASD Conduct Rules 3110, 3370, 2310, and 3010, and NASD Marketplace Rules 6130(d), 6954, 4632(c)(6), 4642(c)(6), 4632(b), 4642(b), 6420(b), and 6955(a). (Disc. Proc. No. CLG050024).

In October 2003, Newbridge was censured and fined \$60,000, among other sanctions, by FINRA for violations of NASD Conduct Rules 2110, 3010, and 3110. (Disc. Proc. No. C07030069).

Eric M. Vallejo entered the securities industry in 1987 with a FINRA member. He first became registered as a general securities representative in January 1988, and as a general securities principal in April 1998. Vallejo currently is registered with Newbridge as a general securities representative and as a general securities principal. He has no disciplinary history.

Kenneth Brown entered the securities industry with a FINRA member in 1981. He first became registered as a general securities representative in December 1984, and as a general securities principal in October 2000. Brown currently is registered with Newbridge as a general securities principal and as a general securities representative. He has no disciplinary history.

OVERVIEW

The allegations against Newbridge include, among others: excessive markups/markdowns, AML violations, e-mail violations, and various supervisory system and supervision violations. Eric M. Vallejo, the firm's head trader, is charged with failing to reasonably supervise the firm's markups in AESP, Inc. common stock. Kenneth Brown, the firm's former compliance officer, is charged with: (1) authorizing the use of variable annuity seminar materials that contained misleading statements, material omissions, and inadequate risk disclosures; and (2) failing to establish and maintain a supervisory system reasonably designed to monitor the firm's practice of paying trading credits to registered representatives as extra compensation in connection with sales of certain stocks. The sanctions include a total of \$177,500 in fines, \$61,416.35 in restitution to customers, and 15 calendar day suspensions in all principal capacities for both Brown and Vallejo.

FACTS AND VIOLATIVE CONDUCT

1. From about January 1, 2003, through about April 30, 2003: (1) **Newbridge** charged excessive markups/markdowns (ranging from about 5.13% to 27.04%) totaling about \$66,019.48, on customer purchases and sales of AESP stock, in violation of NASD Conduct Rules 2110, 2440 and IM-2440; and (2) acting through **Eric M. Vallejo**, failed to reasonably supervise the markups/markdowns charged in AESP to ensure that they were not excessive and failed to follow Newbridge's written supervisory procedures regarding markups/markdowns, in violation of NASD Conduct Rules 2110 and 3010(b).
2. From about April 1, 2002, through about August 15, 2003, **Newbridge** failed to develop and implement a written anti-money laundering program reasonably designed to achieve and monitor the member's compliance with the requirements of the Bank Secrecy Act and the implementing regulations promulgated thereunder, in violation of NASD Conduct Rules 2110 and 3011, and MSRB Rule G-41. Specifically, the firm failed to monitor customer

accounts for and respond to indications of possible money laundering, and failed to adequately investigate customers' backgrounds, as required in the firm's written procedures.

3. From about April 1, 2002, through about August 15, 2003, **Newbridge** failed to report at least six customer complaints within the time frame specified by NASD Conduct Rule 3070, in violation of NASD Conduct Rules 2110 and 3070.
4. In or about February 2003, **Newbridge**, acting through **Kenneth Brown**, approved the use of variable annuity seminar materials that contained misleading statements, material omissions, and inadequate risk disclosures, in violation of NASD Conduct Rule 2210. Brown also failed to file the materials with the FINRA advertising department, in violation of Rule 2210(c)(1).
5. From about April 1, 2002, through about August 15, 2003, **Newbridge**, in violation of NASD Conduct Rules 2110 and 3010(a), failed to establish and maintain a supervisory system reasonably designed to achieve compliance with applicable rules and regulations in the following areas:
 - a. The firm had inadequate procedures to monitor markups and markdowns.
 - b. Until November 2003, the firm's procedures relating to designated securities failed to specify the manner in which to verify customer and security information for purposes of AML requirements, as well as insider trading and unregistered distributions concerns. In addition, the procedures applied only to designated securities transferred or journalled into customer accounts, and not to designated securities deposited into customer accounts.
 - c. With respect to the prevention and detection of possible unauthorized trading through the review of customer sellouts, the procedures did not specify what would constitute a pattern of customer sellouts, what records the designated principal should review, the frequency of review, or how the review should be evidenced.
 - d. The firm's procedures did not address the review of instant message correspondence sent and received by registered representatives, the firm failed to review instant message correspondence in any manner, and in several instances written correspondence had not been reviewed or approved, in violation of NASD Conduct Rules 3010(b) and 3010(d)(2).
 - e. From about January 1, 2003, through about August 15, 2003, acting through **Kenneth Brown**, failed to establish and maintain a supervisory system reasonably designed to ensure that the firm's practice of paying trading credits to registered representatives as extra compensation in connection with sales of certain stocks did not result in sales practice problems. Of 41 customer complaints reviewed by the staff, at least 31 (76%) contained allegations of either unauthorized trading or churning in AESP, NTST, and/or CCEL, securities in which the head trader paid portions of trading profits to registered representatives.
6. During the time period from April 1, 2002, through August 15, 2003, **Newbridge** failed to enforce its written supervisory procedures, in violation of NASD Conduct Rules 2110 and 3010(b), as follows:

- a. The firm failed to enforce its written supervisory procedures relating to internal disciplinary actions against registered representatives with patterns of Regulation T violations in customer accounts.
 - b. The firm failed to enforce its restricted/watch list procedures with respect to investment banking relationships and issuer-related accounts.
 - c. The firm failed to contact previous employers of prospective registered representatives, as required by its procedures.
 - d. With respect to special supervision of registered representatives, the firm failed to prepare memoranda for all individuals reviewed for potential special supervision as required by the firm's procedures, and failed to apply the criteria specified in the procedures to all representatives. The firm also failed to ensure that margin account restrictions placed on two registered representatives were enforced.
7. From 2002 - 2004, Newbridge failed to file an application for approval of a material change in business activities, in violation of NASD Conduct Rule 2110 and Membership and Registration Rule 1017; and from March 1, 2003 through March 31, 2004, Newbridge failed to implement an adequate supervisory system to ensure compliance with the requirements of NASD Membership and Registration Rule 1017, in violation of NASD Conduct Rules 2110 and 3010(a).
 8. Newbridge failed to register its Medford office as a branch office, in violation of NASD Conduct Rules 2110 and IM-1000-4.

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

Newbridge Securities Corporation:

1. \$177,500 fine (\$10,000 of which is joint and several with Respondent Vallejo, and \$10,000 of which is joint and several with Respondent Brown, as noted below).
2. a one-year pre-use filing requirement with the FINRA Advertising Department for all customer advertisements and sales literature relating to seminars offered by the firm and/or its representatives, beginning on the effective date of this AWC.
3. an order to pay restitution to the customers set forth on Schedule A hereto in the total amount of \$61,416.35,¹ plus interest at the rate set forth in Section 6621(a)(2) of the Internal Revenue Code, 26 U.S.C. 6621(a)(2), from August 14, 2003, the date of the violative conduct, until the date this AWC is accepted by the NAC. Satisfactory proof of payment of the restitution or of reasonable and documented efforts undertaken to effect restitution shall be provided to the FINRA staff no later than 120 days after acceptance of this AWC. If for any reason Respondent Newbridge cannot locate any customer after reasonable and documented efforts within such period, or such

¹ While, as noted above, Newbridge charged \$66,019.48 in excessive markups/markdowns, Newbridge is ordered to pay only \$61,416.35 in restitution. The difference represents the omission of transactions for customers with whom Newbridge has reached settlements of claims and has obtained general releases from the customers from further liability for activities in their accounts prior to the date of the settlement.

additional period agreed to by the staff, Respondent shall forward any undistributed restitution and interest to the appropriate escheat, unclaimed property, or abandoned property fund for the state in which the customer is last known to have resided.

Eric M. Vallejo:

1. \$10,000 fine (joint and several with Respondent Newbridge, as noted above).
2. Fifteen calendar day suspension from association with any FINRA member in all principal capacities.

Kenneth Brown:

1. \$10,000 fine (joint and several with Respondent Newbridge, as noted above)
2. Fifteen calendar day suspension from association with any FINRA member in all principal capacities.

Respondents agree to pay any monetary sanctions upon notice that this AWC has been accepted and that such payments are due and payable. Respondents have submitted Election of Payment forms showing the method by which they propose to pay the fines imposed.

Respondents specifically and voluntarily waive any right to claim that they are unable to pay, now or at any time hereafter, the monetary sanctions imposed in this matter.

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

II.

WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a Formal Complaint issued specifying the allegations against us;
- B. To be notified of the Formal 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 General Counsel, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including acceptance or rejection of this AWC.

Respondents further specifically and voluntarily waive any right to claim that a person violated the ex parte prohibitions of NASD Rule 9143 or the separation of functions prohibitions of NASD 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 NASD Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against me; and
- C. If accepted:
1. this AWC will become part of Respondents' permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against Respondents;
 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondents' disciplinary record;
 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with NASD Rule 8310 and IM-8310-3; 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

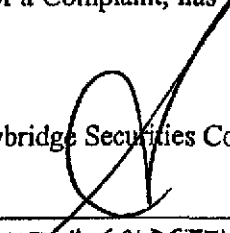
inconsistent with any part of this AWC. Nothing in this provision affects Respondents' right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

- 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 Respondents may not deny the charges or make any statement that is inconsistent with the AWC in this Statement. This Statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

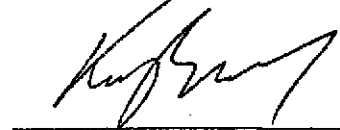
Respondents certify that we have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that we have agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein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

3-06-08
Date

Newbridge Securities Corp.

By: 
SCOTT H. GOLDSTEIN, CEO


Eric M. Vallejo, Respondent


Kenneth Brown, Respondent

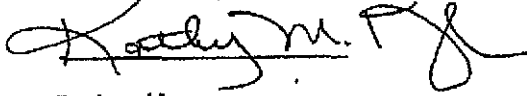
Reviewed by:

GREGG BREITBART, ESQ.
Counsel for Respondent Newbridge



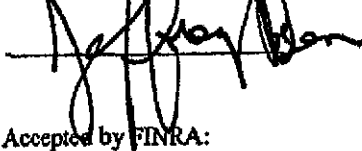
Reviewed by:

Kathy Klock, Esq.
Counsel for Respondent Brown



Reviewed by:

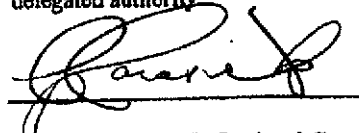
Jeffrey Rosen, Esq.
Counsel for Respondent Vallejo



Accepted by FINRA:

Date: 3/13/08

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



Gene E. Carasick, Sr. Regional Counsel
FINRA Department of Enforcement
3490 Piedmont Road, N.E.
Suite 500
Atlanta, GA 30305
404-239-6125; 202-721-6536 (fax)

Item No.	Trade Date	Buy/Sell	Shares	Prevailing Market Price (PMP)	5% MU/MD From PMP (Min \$75)	Customer Price	Cust MU/MD From PMP	Difference
1	1/17/2003	Buy	1,500	\$ 1.05	\$ 78.75	\$ 1.180	\$ 195.00	\$ 116.25
2	1/3/2003	Buy	6,000	\$ 1.34	\$ 402.00	\$ 1.415	\$ 450.00	\$ 48.00
3	4/11/2003	Buy	10,000	\$ 0.68	\$ 340.00	\$ 0.730	\$ 500.00	\$ 160.00
4	4/22/2003	Sell	4,500	\$ 0.78	\$ 175.50	\$ 0.720	\$ 345.00	\$ 169.50
5	1/7/2003	Sell	5,000	\$ 1.40	\$ 350.00	\$ 1.250	\$ 750.00	\$ 400.00
6	2/11/2003	Sell	1,375	\$ 1.00	\$ 75.00	\$ 0.900	\$ 212.50	\$ 137.50
7	3/12/2003	Buy	20,000	\$ 0.81	\$ 810.00	\$ 0.870	\$ 1,200.00	\$ 390.00
8	4/17/2003	Buy	13,200	\$ 0.51	\$ 336.60	\$ 0.580	\$ 924.00	\$ 587.40
9	4/24/2003	Sell	20,000	\$ 0.90	\$ 900.00	\$ 0.790	\$ 2,200.00	\$ 1,300.00
10	3/14/2003	Buy	10,000	\$ 1.00	\$ 500.00	\$ 1.060	\$ 600.00	\$ 100.00
11	1/23/2003	Sell	19,000	\$ 1.32	\$ 1,254.00	\$ 1.200	\$ 2,430.10	\$ 1,176.10
12	3/18/2003	Buy	10,000	\$ 0.84	\$ 420.00	\$ 0.910	\$ 700.00	\$ 280.00
13	4/11/2003	Buy	10,000	\$ 0.68	\$ 340.00	\$ 0.730	\$ 500.00	\$ 160.00
14	4/17/2003	Sell	10,000	\$ 0.73	\$ 365.00	\$ 0.693	\$ 375.00	\$ 10.00
15	2/14/2003	Sell	7,000	\$ 0.94	\$ 329.00	\$ 0.815	\$ 875.00	\$ 546.00
16	2/11/2003	Sell	5,000	\$ 1.00	\$ 250.00	\$ 0.900	\$ 575.00	\$ 325.00
17	1/23/2003	Buy	1,800	\$ 1.31	\$ 117.90	\$ 1.390	\$ 144.00	\$ 26.10
18	3/5/2003	Buy	4,000	\$ 0.55	\$ 110.00	\$ 0.660	\$ 440.00	\$ 330.00
19	1/7/2003	Buy	1,000	\$ 1.21	\$ 75.00	\$ 1.390	\$ 180.00	\$ 105.00
20	3/12/2003	Buy	5,000	\$ 0.81	\$ 202.50	\$ 0.860	\$ 250.00	\$ 47.50
21	4/23/2003	Sell	6,000	\$ 0.90	\$ 270.00	\$ 0.790	\$ 735.00	\$ 465.00
22	2/14/2003	Buy	5,000	\$ 0.94	\$ 235.00	\$ 1.000	\$ 300.00	\$ 65.00
23	1/23/2003	Sell	30,000	\$ 1.32	\$ 1,980.00	\$ 1.100	\$ 6,600.00	\$ 4,620.00
24	1/28/2003	Sell	4,200	\$ 1.23	\$ 258.30	\$ 1.080	\$ 630.00	\$ 371.70
25	3/26/2003	Buy	2,500	\$ 0.71	\$ 88.75	\$ 0.800	\$ 225.00	\$ 136.25
26	1/23/2003	Buy	20,000	\$ 1.31	\$ 1,310.00	\$ 1.420	\$ 2,200.00	\$ 890.00
27	2/5/2003	Sell	2,000	\$ 1.12	\$ 112.00	\$ 1.000	\$ 240.00	\$ 128.00
28	2/14/2003	Sell	1,000	\$ 0.94	\$ 75.00	\$ 0.850	\$ 165.00	\$ 90.00
29	3/26/2003	Buy	1,900	\$ 0.82	\$ 77.90	\$ 0.890	\$ 133.00	\$ 55.10
30	4/18/2003	Buy	900	\$ 0.53	\$ 75.00	\$ 0.590	\$ 129.00	\$ 54.00
31	1/7/2003	Sell	4,500	\$ 1.40	\$ 315.00	\$ 1.250	\$ 675.00	\$ 360.00
32	3/20/2003	Sell	1,750	\$ 0.88	\$ 77.00	\$ 0.810	\$ 197.50	\$ 120.50
33	2/14/2003	Sell	7,300	\$ 0.94	\$ 343.10	\$ 0.815	\$ 912.50	\$ 569.40
34	2/14/2003	Buy	3,000	\$ 0.94	\$ 141.00	\$ 1.020	\$ 240.00	\$ 99.00
35	3/11/2003	Buy	20,000	\$ 0.62	\$ 620.00	\$ 0.680	\$ 1,200.00	\$ 580.00
36	4/17/2003	Buy	10,000	\$ 0.70	\$ 350.00	\$ 0.770	\$ 700.00	\$ 350.00
37	2/14/2003	Sell	5,000	\$ 0.96	\$ 239.75	\$ 0.810	\$ 745.00	\$ 505.25
38	2/7/2003	Buy	4,300	\$ 0.91	\$ 195.65	\$ 1.030	\$ 516.00	\$ 320.35
39	1/23/2003	Buy	9,000	\$ 1.31	\$ 589.50	\$ 1.410	\$ 900.00	\$ 310.50
40	2/14/2003	Buy	1,550	\$ 0.80	\$ 62.00	\$ 0.990	\$ 294.50	\$ 232.50
41	1/23/2003	Sell	5,000	\$ 1.31	\$ 327.50	\$ 1.200	\$ 550.00	\$ 222.50
42	1/23/2003	Sell	5,000	\$ 1.32	\$ 330.00	\$ 1.200	\$ 600.00	\$ 270.00
43	2/13/2003	Sell	4,500	\$ 0.89	\$ 200.25	\$ 0.820	\$ 315.00	\$ 114.75
44	1/27/2003	Buy	1,000	\$ 1.15	\$ 75.00	\$ 1.280	\$ 130.00	\$ 55.00
45	4/17/2003	Buy	3,500	\$ 0.52	\$ 91.00	\$ 0.570	\$ 175.00	\$ 84.00
46	4/22/2003	Sell	4,500	\$ 0.78	\$ 175.50	\$ 0.670	\$ 495.00	\$ 319.50
47	3/12/2003	Buy	10,000	\$ 0.71	\$ 355.00	\$ 0.750	\$ 400.00	\$ 45.00
48	3/14/2003	Sell	10,000	\$ 0.96	\$ 480.00	\$ 0.910	\$ 500.00	\$ 20.00
49	2/27/2003	Sell	26,600	\$ 0.69	\$ 917.70	\$ 0.600	\$ 2,394.00	\$ 1,476.30
50	1/7/2003	Sell	2,500	\$ 1.40	\$ 175.00	\$ 1.300	\$ 250.00	\$ 75.00
51	4/24/2003	Sell	4,000	\$ 0.90	\$ 180.00	\$ 0.810	\$ 435.00	\$ 255.00
52	1/27/2003	Buy	1,800	\$ 1.13	\$ 101.70	\$ 1.300	\$ 306.00	\$ 204.30

53	2/11/2003	Sell	1,800	\$ 1.09	\$ 98.10	\$ 0.980	\$ 273.00	\$ 174.90
54	3/28/2003	Sell	2,000	\$ 0.75	\$ 75.00	\$ 0.620	\$ 335.00	\$ 260.00
55	3/14/2003	Sell	1,000	\$ 0.96	\$ 75.00	\$ 0.835	\$ 125.00	\$ 50.00
56	1/23/2003	Sell	3,000	\$ 1.31	\$ 196.50	\$ 1.220	\$ 370.00	\$ 173.50
57	1/23/2003	Sell	500	\$ 1.32	\$ 75.00	\$ 1.150	\$ 85.00	\$ 10.00
58	4/23/2003	Sell	1,100	\$ 0.90	\$ 75.00	\$ 0.810	\$ 174.00	\$ 99.00
59	1/17/2003	Buy	8,300	\$ 1.00	\$ 415.00	\$ 1.170	\$ 1,411.00	\$ 996.00
60	1/17/2003	Buy	8,000	\$ 1.00	\$ 400.00	\$ 1.170	\$ 1,360.00	\$ 960.00
61	2/7/2003	Sell	7,000	\$ 1.13	\$ 394.45	\$ 0.910	\$ 1,519.00	\$ 1,124.55
62	1/22/2003	Sell	5,000	\$ 1.15	\$ 287.50	\$ 1.082	\$ 340.00	\$ 52.50
63	1/27/2003	Buy	1,000	\$ 1.13	\$ 75.00	\$ 1.280	\$ 150.00	\$ 75.00
64	4/16/2003	Buy	5,000	\$ 0.53	\$ 132.50	\$ 0.590	\$ 300.00	\$ 167.50
65	1/9/2003	Sell	5,000	\$ 1.40	\$ 350.00	\$ 1.220	\$ 900.00	\$ 550.00
66	2/14/2003	Buy	8,800	\$ 0.94	\$ 413.60	\$ 1.020	\$ 704.00	\$ 290.40
67	2/14/2003	Buy	7,200	\$ 0.94	\$ 338.40	\$ 1.045	\$ 756.00	\$ 417.60
68	3/26/2003	Buy	2,500	\$ 0.75	\$ 93.75	\$ 0.880	\$ 325.00	\$ 231.25
69	3/28/2003	Sell	2,500	\$ 0.81	\$ 101.25	\$ 0.730	\$ 275.00	\$ 173.75
70	3/18/2003	Buy	2,200	\$ 0.95	\$ 104.50	\$ 1.010	\$ 132.00	\$ 27.50
71	1/16/2003	Sell	1,000	\$ 1.17	\$ 75.00	\$ 1.060	\$ 185.00	\$ 110.00
72	1/23/2003	Sell	3,600	\$ 1.32	\$ 237.60	\$ 1.200	\$ 432.00	\$ 194.40
73	4/22/2003	Sell	11,500	\$ 0.76	\$ 437.00	\$ 0.663	\$ 1,120.10	\$ 683.10
74	4/22/2003	Sell	2,000	\$ 0.78	\$ 78.00	\$ 0.700	\$ 235.00	\$ 157.00
75	1/17/2003	Buy	2,000	\$ 1.00	\$ 100.00	\$ 1.165	\$ 330.00	\$ 230.00
76	3/13/2003	Buy	3,500	\$ 0.94	\$ 164.50	\$ 1.030	\$ 315.00	\$ 150.50
77	2/14/2003	Buy	2,100	\$ 0.80	\$ 84.00	\$ 0.990	\$ 399.00	\$ 315.00
78	3/13/2003	Sell	5,000	\$ 1.00	\$ 250.00	\$ 0.910	\$ 450.00	\$ 200.00
79	1/28/2003	Sell	7,500	\$ 1.23	\$ 461.25	\$ 1.070	\$ 1,200.00	\$ 738.75
80	2/14/2003	Sell	5,000	\$ 0.94	\$ 235.00	\$ 0.850	\$ 450.00	\$ 215.00
81	1/23/2003	Sell	8,000	\$ 1.31	\$ 524.00	\$ 1.170	\$ 1,120.00	\$ 596.00
82	1/31/2003	Sell	5,000	\$ 1.16	\$ 290.00	\$ 1.080	\$ 400.00	\$ 110.00
83	2/10/2003	Sell	6,000	\$ 0.96	\$ 288.00	\$ 0.850	\$ 660.00	\$ 372.00
84	2/10/2003	Sell	5,000	\$ 0.95	\$ 237.50	\$ 0.870	\$ 400.00	\$ 162.50
85	3/12/2003	Buy	20,000	\$ 0.71	\$ 710.00	\$ 0.750	\$ 800.00	\$ 90.00
86	3/18/2003	Buy	10,000	\$ 1.01	\$ 505.00	\$ 1.090	\$ 800.00	\$ 295.00
87	4/24/2003	Sell	2,200	\$ 0.90	\$ 99.00	\$ 0.840	\$ 207.00	\$ 108.00
88	4/24/2003	Sell	8,000	\$ 0.90	\$ 360.00	\$ 0.840	\$ 555.00	\$ 195.00
89	2/14/2003	Buy	5,000	\$ 0.94	\$ 235.00	\$ 1.020	\$ 400.00	\$ 165.00
90	2/14/2003	Buy	7,000	\$ 0.94	\$ 329.00	\$ 1.020	\$ 560.00	\$ 231.00
91	4/17/2003	Buy	10,000	\$ 0.70	\$ 350.00	\$ 0.770	\$ 700.00	\$ 350.00
92	1/17/2003	Sell	10,000	\$ 1.17	\$ 585.00	\$ 1.000	\$ 1,900.00	\$ 1,315.00
93	4/17/2003	Buy	10,000	\$ 0.70	\$ 350.00	\$ 0.760	\$ 600.00	\$ 250.00
94	1/7/2003	Buy	4,000	\$ 1.21	\$ 242.00	\$ 1.410	\$ 800.00	\$ 558.00
95	2/14/2003	Sell	10,000	\$ 0.94	\$ 470.00	\$ 0.810	\$ 1,300.00	\$ 830.00
96	4/11/2003	Buy	10,000	\$ 0.68	\$ 340.00	\$ 0.730	\$ 500.00	\$ 160.00
97	4/22/2003	Sell	9,000	\$ 0.80	\$ 360.00	\$ 0.720	\$ 794.70	\$ 434.70
98	2/14/2003	Buy	3,000	\$ 0.94	\$ 141.00	\$ 1.020	\$ 240.00	\$ 99.00
99	4/24/2003	Buy	30,000	\$ 1.00	\$ 1,500.00	\$ 1.060	\$ 1,800.00	\$ 300.00
100	1/14/2003	Sell	4,000	\$ 1.17	\$ 234.00	\$ 1.040	\$ 520.00	\$ 286.00
101	3/11/2003	Buy	1,700	\$ 0.69	\$ 75.00	\$ 0.740	\$ 85.00	\$ 10.00
102	3/31/2003	Sell	1,800	\$ 0.73	\$ 75.00	\$ 0.650	\$ 144.00	\$ 69.00
103	4/8/2003	Sell	14,000	\$ 0.67	\$ 469.00	\$ 0.595	\$ 1,050.00	\$ 581.00
104	3/31/2003	Sell	800	\$ 0.73	\$ 75.00	\$ 0.610	\$ 96.00	\$ 21.00
105	2/24/2003	Buy	2,000	\$ 0.78	\$ 78.00	\$ 0.900	\$ 240.00	\$ 162.00
106	2/10/2003	Buy	1,550	\$ 0.96	\$ 75.00	\$ 1.025	\$ 100.75	\$ 25.75
107	1/7/2003	Sell	6,500	\$ 1.40	\$ 455.00	\$ 1.170	\$ 1,495.00	\$ 1,040.00

108	1/27/2003	Buy	8,000	\$	1.13	\$	452.00	\$	1.290	\$	1,280.00	\$	828.00
109	2/4/2003	Sell	8,000	\$	1.06	\$	424.00	\$	1.000	\$	480.00	\$	56.00
110	2/6/2003	Buy	6,000	\$	1.05	\$	315.00	\$	1.180	\$	780.00	\$	465.00
111	3/26/2003	Buy	2,000	\$	0.91	\$	91.00	\$	0.970	\$	120.00	\$	29.00
112	3/11/2003	Buy	3,000	\$	0.69	\$	103.50	\$	0.740	\$	225.00	\$	121.50
113	3/25/2003	Buy	1,750	\$	0.82	\$	75.00	\$	0.920	\$	175.00	\$	100.00
114	1/14/2003	Sell	2,000	\$	1.17	\$	117.00	\$	1.030	\$	280.00	\$	163.00
115	2/5/2003	Buy	1,500	\$	1.12	\$	84.00	\$	1.190	\$	105.00	\$	21.00
116	2/14/2003	Buy	1,000	\$	0.94	\$	75.00	\$	1.055	\$	115.00	\$	40.00
118	3/25/2003	Buy	1,000	\$	0.82	\$	75.00	\$	0.910	\$	90.00	\$	15.00
118	1/16/2003	Sell	2,500	\$	1.17	\$	146.25	\$	0.980	\$	475.00	\$	328.75
119	1/7/2003	Sell	5,000	\$	1.40	\$	350.00	\$	1.170	\$	1,150.00	\$	800.00
120	1/14/2003	Sell	2,500	\$	1.17	\$	146.25	\$	1.030	\$	350.00	\$	203.75
121	1/28/2003	Sell	2,500	\$	1.13	\$	141.25	\$	1.060	\$	175.00	\$	33.75
122	2/11/2003	Buy	6,000	\$	1.04	\$	312.00	\$	1.140	\$	600.00	\$	288.00
123	4/11/2003	Sell	3,000	\$	0.55	\$	82.50	\$	0.510	\$	120.00	\$	37.50
124	2/5/2003	Buy	1,500	\$	1.12	\$	84.00	\$	1.190	\$	105.00	\$	21.00
125	3/14/2003	Sell	1,500	\$	1.00	\$	75.00	\$	0.940	\$	90.00	\$	15.00
126	3/25/2003	Buy	1,500	\$	0.81	\$	75.00	\$	0.920	\$	165.00	\$	90.00
127	2/21/2003	Buy	2,000	\$	0.74	\$	74.00	\$	0.840	\$	200.00	\$	126.00
128	1/17/2003	Buy	5,000	\$	1.00	\$	250.00	\$	1.170	\$	850.00	\$	600.00
129	2/24/2003	Buy	12,500	\$	0.78	\$	487.50	\$	0.890	\$	1,375.00	\$	887.50
130	1/24/2003	Sell	2,000	\$	1.32	\$	132.00	\$	1.203	\$	235.00	\$	103.00
131	2/10/2003	Sell	3,000	\$	0.96	\$	144.00	\$	0.870	\$	270.00	\$	126.00
132	2/14/2003	Sell	4,000	\$	0.94	\$	188.00	\$	0.820	\$	480.00	\$	292.00
133	1/13/2003	Buy	3,000	\$	1.25	\$	187.65	\$	1.380	\$	387.00	\$	199.35
134	2/10/2003	Buy	7,000	\$	1.06	\$	371.00	\$	1.120	\$	420.00	\$	49.00
135	1/7/2003	Sell	5,000	\$	1.40	\$	350.00	\$	1.310	\$	450.00	\$	100.00
136	1/23/2003	Sell	2,500	\$	1.31	\$	163.75	\$	1.190	\$	300.00	\$	136.25
137	3/26/2003	Buy	1,600	\$	0.77	\$	75.00	\$	0.860	\$	144.00	\$	69.00
138	1/14/2003	Buy	3,000	\$	1.17	\$	175.50	\$	1.230	\$	180.00	\$	4.50
139	1/17/2003	Buy	5,000	\$	1.00	\$	250.00	\$	1.170	\$	850.00	\$	600.00
140	2/14/2003	Sell	5,000	\$	0.94	\$	235.00	\$	0.850	\$	450.00	\$	215.00
141	1/13/2003	Buy	5,000	\$	1.25	\$	312.75	\$	1.410	\$	795.00	\$	482.25
142	1/27/2003	Sell	9,000	\$	1.13	\$	508.50	\$	1.070	\$	540.00	\$	31.50
143	2/24/2003	Buy	3,000	\$	0.78	\$	117.00	\$	0.900	\$	360.00	\$	243.00
144	4/24/2003	Buy	2,000	\$	0.82	\$	82.00	\$	0.920	\$	200.00	\$	118.00
145	3/26/2003	Buy	5,700	\$	0.91	\$	259.35	\$	0.960	\$	285.00	\$	25.65
146	2/24/2003	Buy	10,000	\$	0.78	\$	390.00	\$	0.830	\$	500.00	\$	110.00
147	3/5/2003	Sell	4,000	\$	0.60	\$	120.00	\$	0.540	\$	240.00	\$	120.00
148	1/14/2003	Sell	3,000	\$	1.17	\$	175.50	\$	1.020	\$	450.00	\$	274.50
149	3/24/2003	Buy	4,000	\$	0.81	\$	162.00	\$	0.890	\$	320.00	\$	158.00
150	4/14/2003	Buy	1,500	\$	0.57	\$	75.00	\$	0.630	\$	165.00	\$	90.00
151	4/1/2003	Buy	5,000	\$	0.67	\$	167.50	\$	0.750	\$	400.00	\$	232.50
152	4/14/2003	Buy	1,300	\$	0.57	\$	75.00	\$	0.630	\$	153.00	\$	78.00
153	2/10/2003	Buy	1,450	\$	0.96	\$	75.00	\$	1.025	\$	94.25	\$	19.25
154	2/6/2003	Buy	3,000	\$	1.05	\$	157.50	\$	1.140	\$	270.00	\$	112.50
155	2/11/2003	Buy	3,500	\$	1.00	\$	175.00	\$	1.110	\$	385.00	\$	210.00
156	1/17/2003	Buy	2,000	\$	1.00	\$	100.00	\$	1.170	\$	340.00	\$	240.00
157	1/23/2003	Sell	2,000	\$	1.32	\$	132.00	\$	1.200	\$	240.00	\$	108.00
158	4/24/2003	Buy	20,000	\$	0.91	\$	910.00	\$	0.960	\$	1,000.00	\$	90.00
159	3/26/2003	Buy	25,000	\$	0.86	\$	1,075.00	\$	0.966	\$	2,650.00	\$	1,575.00
160	4/24/2003	Buy	30,000	\$	0.80	\$	1,200.00	\$	0.950	\$	4,500.00	\$	3,300.00
161	4/25/2003	Buy	10,000	\$	0.80	\$	400.00	\$	0.880	\$	800.00	\$	400.00
162	1/14/2003	Buy	10,000	\$	1.17	\$	585.00	\$	1.230	\$	800.00	\$	15.00

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163	1/23/2003	Sell	5,000	\$	1.31	\$	327.50	\$	1.190	\$	600.00	\$	272.50
164	1/29/2003	Sell	2,000	\$	1.17	\$	117.00	\$	1.080	\$	180.00	\$	63.00
165	2/3/2003	Sell	3,000	\$	1.16	\$	174.00	\$	1.060	\$	300.00	\$	126.00
166	4/24/2003	Buy	3,500	\$	0.80	\$	140.00	\$	0.920	\$	420.00	\$	280.00
167	4/24/2003	Buy	15,000	\$	0.89	\$	667.50	\$	0.950	\$	900.00	\$	232.50
168	4/24/2003	Buy	5,000	\$	0.82	\$	205.00	\$	0.930	\$	550.00	\$	345.00
169	2/24/2003	Sell	5,000	\$	0.78	\$	195.00	\$	0.680	\$	500.00	\$	305.00
170	2/14/2003	Sell	2,000	\$	0.90	\$	90.00	\$	0.800	\$	200.00	\$	110.00
171	2/12/2003	Buy	5,000	\$	1.03	\$	257.50	\$	1.130	\$	500.00	\$	242.50
172	2/24/2003	Sell	12,400	\$	0.78	\$	483.60	\$	0.670	\$	1,364.00	\$	880.40
173	3/26/2003	Buy	800	\$	0.75	\$	75.00	\$	0.860	\$	88.00	\$	13.00
174	3/20/2003	Sell	1,900	\$	0.88	\$	83.60	\$	0.810	\$	208.00	\$	124.40
175	4/24/2003	Buy	7,000	\$	0.80	\$	280.00	\$	0.930	\$	910.00	\$	630.00
176	4/23/2003	Buy	7,500	\$	0.70	\$	262.50	\$	0.835	\$	1,012.50	\$	750.00
177	4/23/2003	Sell	7,500	\$	0.70	\$	262.50	\$	0.650	\$	375.00	\$	112.50
178	2/21/2003	Buy	10,100	\$	0.74	\$	373.70	\$	0.810	\$	707.00	\$	333.30
179	3/5/2003	Buy	10,000	\$	0.56	\$	280.00	\$	0.660	\$	1,000.00	\$	720.00
180	2/5/2003	Buy	1,500	\$	1.12	\$	84.00	\$	1.190	\$	105.00	\$	21.00
181	2/14/2003	Buy	1,500	\$	0.94	\$	75.00	\$	1.055	\$	172.50	\$	97.50
182	2/14/2003	Buy	1,500	\$	0.94	\$	75.00	\$	1.055	\$	172.50	\$	97.50
183	2/6/2003	Buy	4,000	\$	1.05	\$	210.00	\$	1.180	\$	520.00	\$	310.00
184	3/24/2003	Buy	6,500	\$	0.81	\$	263.25	\$	0.920	\$	715.00	\$	451.75
185	4/24/2003	Buy	1,800	\$	0.80	\$	72.00	\$	0.920	\$	216.00	\$	144.00
186	3/18/2003	Sell	2,000	\$	1.01	\$	101.00	\$	0.950	\$	196.00	\$	95.00
187	4/25/2003	Buy	5,000	\$	0.80	\$	200.00	\$	0.880	\$	400.00	\$	200.00
188	1/14/2003	Sell	2,300	\$	1.17	\$	134.55	\$	1.020	\$	345.00	\$	210.45
189	4/24/2003	Buy	4,000	\$	0.70	\$	140.00	\$	0.810	\$	440.00	\$	300.00
190	1/14/2003	Sell	750	\$	1.17	\$	75.00	\$	1.020	\$	112.50	\$	37.50
191	1/23/2003	Buy	1,700	\$	1.31	\$	111.35	\$	1.390	\$	136.00	\$	24.65
192	1/14/2003	Sell	1,000	\$	1.17	\$	75.00	\$	1.020	\$	150.00	\$	75.00
193	1/8/2003	Buy	10,000	\$	1.40	\$	700.00	\$	1.510	\$	1,100.00	\$	400.00
194	1/14/2003	Buy	5,000	\$	1.17	\$	292.50	\$	1.230	\$	300.00	\$	7.50
195	1/8/2003	Buy	2,000	\$	1.40	\$	140.00	\$	1.520	\$	240.00	\$	100.00
196	2/6/2003	Buy	10,000	\$	0.93	\$	465.00	\$	0.980	\$	500.00	\$	35.00
197	1/23/2003	Sell	1,500	\$	1.32	\$	99.00	\$	1.200	\$	180.00	\$	81.00
198	1/8/2003	Buy	4,500	\$	1.40	\$	315.00	\$	1.510	\$	495.00	\$	180.00
199	2/5/2003	Buy	5,000	\$	1.12	\$	280.00	\$	1.190	\$	350.00	\$	70.00
200	1/14/2003	Sell	1,000	\$	1.17	\$	75.00	\$	1.020	\$	150.00	\$	75.00
201	3/12/2003	Buy	2,000	\$	0.73	\$	75.00	\$	0.840	\$	220.00	\$	145.00
											Total:	\$	61,416.35