

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2020066971201**

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

RE: Robinhood Financial LLC (Respondent)
Member Firm
CRD No. 165998

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

I.

ACCEPTANCE AND CONSENT

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

BACKGROUND

Robinhood Financial LLC became a FINRA member firm in October 2013 and launched online trading in December 2014. Robinhood is a FinTech¹ firm that offers commission-free, self-directed trading for retail investors through its mobile applications and website. Robinhood is headquartered in Menlo Park, California, and has approximately 770 registered representatives and six branch offices.

In December 2019, Robinhood entered into an AWC with FINRA (No. 2017056224001), through which it consented to findings that, from October 1, 2016, through November 9, 2017, the firm violated FINRA Rules 5310(a), 5310.09, 3110(a), 3110(b), and 2010 by not exercising reasonable diligence to ascertain that the broker-dealers to which it routed customer orders for payment for order flow provided the best execution quality as compared to other execution venues and by not having a reasonably designed supervisory system and procedures to achieve compliance with its best execution obligations under FINRA's rules. The firm consented to a censure, a \$1,250,000 fine, and an undertaking to retain an independent consultant to conduct a comprehensive review of the adequacy of

¹ "FinTech" refers to new uses of financial technology. See <https://www.finra.org/rules-guidance/key-topics/fintech>.

the firm’s policies, systems, procedures, and training relating to achieving compliance with FINRA Rule 5310.²

In December 2020, Robinhood entered into an Offer of Settlement with the Securities and Exchange Commission, through which it consented to findings that the firm made material misstatements and omissions relating to its receipt of payment for order flow and relating to the execution quality it achieved for its customers’ orders, in violation of Sections 17(a)(2) and 17(a)(3) of the Securities Act of 1933 (Securities Act), and that Robinhood did not maintain required records, in violation of Section 17(a) of the Securities Exchange Act of 1934 (Exchange Act) and Rule 17a-4 thereunder. The SEC imposed the following sanctions: (1) an order to cease and desist from committing or causing any violations and any future violations of Section 17(a) of the Securities Act and Section 17(a) of the Exchange Act and Rule 17a-4 thereunder; (2) a censure; (3) a \$65,000,000 civil money penalty; and (4) an undertaking to retain an independent compliance consultant to, among other things, conduct a comprehensive review of Robinhood’s policies and procedures to ensure that Robinhood’s retail communications comply with the requirements of the federal securities laws.^{3, 4}

OVERVIEW

Robinhood is an introducing broker-dealer that provides commission-free trading to retail customers through its website and mobile applications. The firm’s stated mission is to “democratize and de-mystify finance for all,” and to “make investing friendly, approachable, and understandable for newcomers and experts alike.” Since launching its online trading platforms in December 2014, Robinhood has quickly attracted customers—many of whom are relatively young and new to investing⁵—including through offerings such as no-minimum, commission-free trading and a user interface “designed to . . . appeal to a new generation of investors who are more comfortable trading on smartphones.” Through these and other initiatives, Robinhood has experienced dramatic growth—from fewer than 500,000 customers in 2015 to over 31 million today.⁶

False and misleading information distributed to customers – Despite Robinhood’s mission to “de-mystify finance for all” and to make investing “understandable for newcomers and experts alike,” during certain periods since September 2016, the firm has

² Robinhood retained a consultant (the Third-Party Consultant) in connection with its December 2019 AWC with FINRA to conduct a non-privileged review of the adequacy of the firm’s policies, systems, procedures, and training relating to achieving compliance with FINRA Rule 5310.

³ Robinhood retained the same Third-Party Consultant in connection with its December 2020 Offer of Settlement with the SEC.

⁴ For more information about the firm, including prior regulatory events, visit BrokerCheck® at www.finra.org/brokercheck.

⁵ As of February 2021, the median age of Robinhood’s customers was 31, and approximately half of the firm’s customers self-identified as first-time investors. The median customer account size was approximately \$240, and the average account size was approximately \$5,000.

⁶ Of these accounts, approximately 18 million were funded as of the end of the first quarter 2021.

negligently communicated a wide array of false and misleading information to its customers. Among others:

- Robinhood falsely told “Robinhood Instant” customers that they had to upgrade to “Robinhood Gold” to trade on margin when, in fact, Robinhood allowed “Instant” customers to place options trades that could trigger the use of margin.
- Robinhood falsely told “Robinhood Gold” customers that they could “disable” margin in their accounts when, in fact, Robinhood allowed “Gold” customers to place options trades that could trigger the use of margin even after they had “disabled” margin.
- Robinhood displayed inaccurate cash balances to certain customers. Some inaccuracies were significant. For example, Robinhood displayed to many customers negative cash balances that were twice as large as they actually were.
- Robinhood provided false information to customers about the risks associated with certain options transactions. For example, Robinhood falsely told customers that they would “never lose more than the premium paid to enter [a] debit spread” when customers could, and many did, lose vastly more than the premiums they paid.
- Robinhood issued to certain customers erroneous margin calls and margin call warnings, telling them that they were in “danger of a margin call” when they were not.

As a result of these and other false and misleading statements, Robinhood violated FINRA Rule 2010, which prohibits FINRA member firms from making misrepresentations to customers. Robinhood’s negligent dissemination of false and misleading information to its customers separately violated FINRA Rules 2210 and 2220, which set forth content standards for firms’ communications with customers. Because Robinhood failed to have a reasonably designed supervisory system and procedures to achieve compliance with FINRA rules and applicable securities laws requiring that communications with customers be truthful and not misleading, it also violated FINRA Rules 3110 and 2010.

Failure to exercise due diligence before approving options accounts – Since Robinhood began offering options trading to customers in December 2017, the firm has failed to exercise due diligence before approving customers to trade options. Although the firm’s written supervisory procedures assign registered options principals the responsibility of approving accounts for options trading, the firm, in practice, has relied on computer algorithms—known at Robinhood as “option account approval bots”—with only limited oversight by firm principals. This system suffers from a number of flaws, including the following:

- The bots were programmed to approve options trading based on inconsistent or illogical information, including for customers who were younger than 21 years old but who claimed to have had more than three years' experience trading options.
- The bots approved certain customers with low risk tolerance for options trading, even though the firm's written procedures prohibited the firm from approving those customers from trading options.
- The bots were programmed only to take into account the most recent information provided by customers, meaning that the firm approved for options trading customers whom it had previously rejected for options trading—often only minutes earlier.

As a result of these flaws and Robinhood's overall failure to exercise due diligence before approving customers for options trading, the firm has approved thousands of customers who did not satisfy the firm's eligibility criteria or whose accounts contained red flags that options trading may not be appropriate for them, in violation of FINRA Rules 3110, 2360, and 2010.

Failure to supervise technology critical to providing customers with core broker-dealer services – From January 2018 to February 2021, Robinhood failed to reasonably supervise the operation and maintenance of its technology, which, as a FinTech firm, Robinhood relies upon to deliver core functions, including accepting and executing customer orders. Instead, Robinhood outsourced the operation and maintenance of its technology to its parent company, Robinhood Markets, Inc. (RHM)—which is not a FINRA member firm—without broker-dealer oversight. Robinhood experienced a series of outages and critical systems failures between 2018 and late 2020, which, in turn, prevented Robinhood from providing its customers with basic broker-dealer services, such as order entry and execution. The most serious outage, which occurred on March 2-3, 2020, rendered the website and mobile applications inoperable. During the March outage, all of Robinhood's customers were unable to trade. These outages persisted despite two warnings from FINRA that the firm was not reasonably supervising its technology.

Because Robinhood failed to reasonably supervise the operation and maintenance of the technology it relied upon to provide core broker-dealer services, Robinhood violated FINRA Rules 3110 and 2010.

Failure to create a reasonably designed business continuity plan – At the time of the March 2-3 outage, Robinhood's business continuity plan (BCP) was not reasonably designed to allow the firm to meet its obligations to customers in the event of a significant business disruption, as required by FINRA Rule 4370. Robinhood's BCP was limited to events that *physically* prevented employees from working from the firm's premises. As such, the firm did not consider applying its BCP to technology-related business disruptions, including the March 2-3 outage, which Robinhood considered an "existential" threat to its business. In addition, the firm's BCP was not reasonably

tailored to the firm’s business model. For example, the BCP referenced backup methods for accepting and executing customer orders that the firm did not have. As a result, Robinhood violated FINRA Rules 4370 and 2010.

Failure to report customer complaints to FINRA – Between January 2018 and December 2020, Robinhood failed to report to FINRA tens of thousands of customer complaints that it was required to report under FINRA Rule 4530, including complaints that Robinhood provided customers with false or misleading information and that customers suffered losses as a result of the firm’s outages and systems failures. As a result of its failure to report these, and other, customer complaints, Robinhood violated FINRA Rules 4530(d) and 2010.

Failure to have a reasonably designed customer identification program – From June 2016 to November 2018, Robinhood failed to establish or maintain a customer identification program that was appropriate for the firm’s size and business. The firm approved more than 5.5 million new customer accounts during that period, relying on a customer identification system that was largely automated and suffered from flaws. For example, even though Robinhood received alerts flagging certain applications as potentially fraudulent—including applications where the customer’s purported Social Security number belonged to a person who was deceased—Robinhood’s customer identification system “overrode” those alerts and approved the applications without any review. In all, Robinhood approved more than 90,000 accounts from June 2016 to November 2018 that had been flagged for potential fraud without further manual review. As a result of its failure to have a reasonably designed customer identification program, Robinhood opened thousands of accounts despite red flags of potential fraud or identity theft, in violation of FINRA Rules 3310 and 2010.

Failure to display complete market data information – Between January 2018 and November 2019, Robinhood failed to display complete market data information on its website and mobile applications, as required by Rule 603(c) of Regulation NMS of the Exchange Act. As a result, Robinhood violated Rule 603(c) and FINRA Rule 2010.

FACTS AND VIOLATIVE CONDUCT

A. Robinhood communicated false and misleading information to customers.

FINRA Rule 2010 requires firms to observe high standards of commercial honor and just and equitable principles of trade in the conduct of their business. Making a negligent misrepresentation or an omission of a material fact to customers violates FINRA Rule 2010, as it is inconsistent with just and equitable principles of trade.

FINRA Rules 2210 and 2220 set forth content standards for firms’ communications with customers. FINRA Rule 2210 requires, among other things, that communications be “fair and balanced”; not contain any “false, exaggerated, unwarranted, promissory or misleading statement or claim”; and not omit “any material fact . . . if the omission, in light of the context of the material presented, would cause the communications to be misleading.” And FINRA Rule 2220, which addresses member firms’ communications

about options trading, requires firms to “avoid[]” making “broad generalities” about the risks of options trading, and prohibits, among other things, making “any untrue statement or omission of a material fact” or any statement that “is otherwise false or misleading,” or that “fails to reflect the risks attendant to options transactions and the complexities of certain options investment strategies.” A violation of FINRA Rules 2210 and 2220 also constitutes a violation of FINRA Rule 2010.

FINRA Rule 3110 requires that firms establish and maintain a supervisory system, and establish, maintain, and enforce written supervisory procedures, that are reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA rules. A violation of FINRA Rule 3110 also constitutes a violation of FINRA Rule 2010.

1. Robinhood negligently misrepresents to customers that certain accounts are not margin-enabled.

“Robinhood Instant” accounts are the default account type for all new Robinhood customers. Since December 2017, Robinhood has falsely told “Robinhood Instant” customers that they can only “trade using unsettled funds up to the amount in their Robinhood Instant accounts.” Indeed, Robinhood has misrepresented on its website that access to margin requires customers to upgrade to “Robinhood Gold” accounts:

When you sign up for Robinhood Gold, you'll be able to receive extra buying power when you enable borrowing. This buying power represents the cash you have already available to spend, plus the amount you may borrow on margin.

NOTE

Access to margin is not automatic to everyone, and requires you to upgrade to Gold.

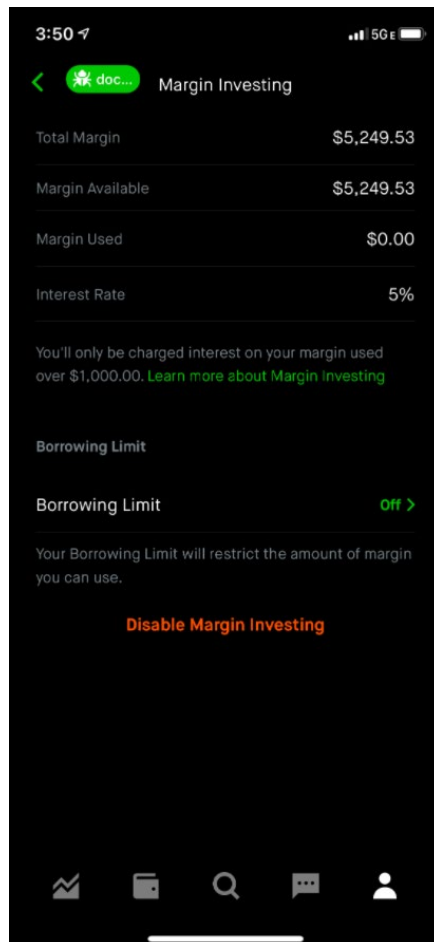
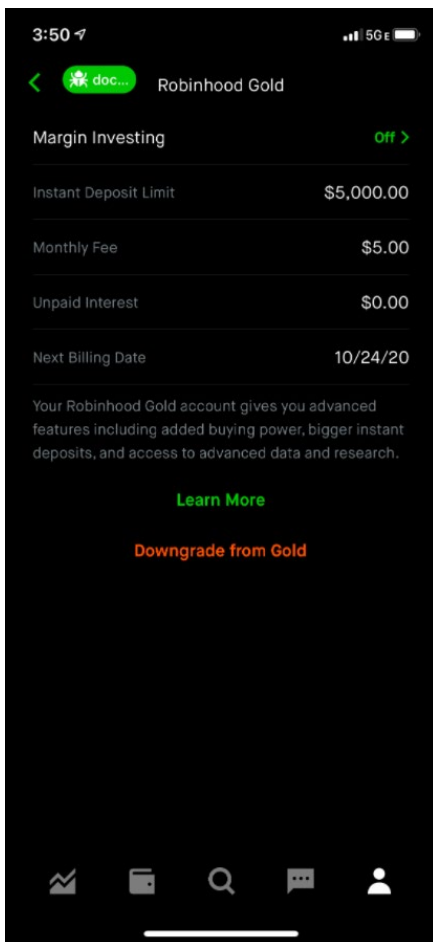
Since at least April 10, 2019, Robinhood has falsely told “Robinhood Gold” customers that they can “disable” margin. The firm’s website states:

Margin isn't for me—can I still use Robinhood Gold?

Robinhood Gold is for every investor, whether or not you want to invest on margin. You can sign up for Robinhood Gold, turn margin trading off, and use all of the other premium features.

Even if you're not interested in margin, you can still sign up for Gold and use the other premium features.

Moreover, when customers sign up for “Robinhood Gold,” the firm gives them the option to turn margin investing “On” or “Off.” And if a customer opts into margin, the firm offers him or her the option to “Disable Margin Investing”:



Despite these statements, Robinhood has allowed approximately 818,000 customers who had been approved for options trading—either “Instant” customers or “Gold” customers with margin “disabled”—to make trades, such as options spreads, that could and often did automatically trigger the use of margin. For instance, the firm permitted those customers to enter into options spreads which, if assigned on the short leg, required the use of margin to satisfy the assignment. Robinhood fails to disclose to customers that—even if they have an “Instant” account or a “Gold” account with margin “disabled”—they still can make trades that can result in the use of potentially hundreds of thousands of dollars of margin.

Robinhood’s misrepresentations have confused some customers. For instance, Customer A, a 20-year-old “Robinhood Gold” customer who had turned margin “off,” took his own life in June 2020. In a note found after his death, he expressed confusion as to how he could have used margin to purchase securities upon assignment of the short leg of an options spread because, he believed, he had not “turned on” margin in his account.

Other customers who received margin calls after being assigned on the short legs of their options spreads were similarly confused. For example, one “Robinhood Instant” customer complained to Robinhood that he had not been “set up for margin investing.” And after receiving a \$271,986.64 margin call following an options assignment, a “Robinhood Gold” customer wrote in emails to the firm: “This must not be accurate as margin trading is off in my account. . . . I DO NOT have margin trading enabled on my account. . . . I specifically selected to not trade on margin to limit my losses only to what I personally have in my account.”

By making negligent misrepresentations and omissions of material fact about whether customers had margin enabled in their accounts, Robinhood violated FINRA Rule 2010, as well as FINRA Rules 2210 and 2010.

2. Robinhood displayed inaccurate cash balances and buying power calculations.

Between December 2019 and June 2020, Robinhood displayed on its website and its mobile applications inaccurate cash balances to more than 135,000 customers. Robinhood either doubled these customers’ actual negative cash balances or inflated their cash balances by displaying buying power as “cash.” The firm displayed these erroneous cash balances to “Robinhood Instant” and “Robinhood Gold” customers who either: (1) were randomly provided a test account feature by Robinhood or (2) enrolled in the firm’s cash management program.⁷

The type of inaccurate cash balance that Robinhood displayed varied by account type:

- For “Instant” customers and “Gold” customers who had toggled margin “off,” from December 2019 to June 2020, Robinhood’s website and mobile applications displayed negative cash balances that were double those customers’ actual negative cash balances. For example, the day before Customer A died, Robinhood displayed to the customer a cash balance of $-\$730,165.72$, even though the customer’s account’s actual cash balance was $-\$365,530.60$. Customer A had incurred the $-\$365,530.60$ balance after being assigned early on the short leg of an options spread transaction.
- For “Gold” customers who had toggled margin “on,” from December 2019 to March 2020, Robinhood’s website displayed cash balances that reflected their accounts’ buying power, rather than their actual cash balances. Thus, for example, during a live demonstration to FINRA staff of trading activity in a mock account, the firm’s website displayed the account’s cash balance as a positive value, $\$2,311.44$ —a figure reflecting the account’s buying power due to the account’s ability to use margin. In fact, the account’s actual cash balance was negative: $-\$609$.

⁷ The firm advertised the cash management program as one through which customers could earn “interest . . . on uninvested cash swept from your brokerage account to the program banks.”

Likewise, from September 2016 through September 2020, Robinhood displayed to approximately 4.2 million customers inaccurate “negative buying power” values in amounts that were double those customers’ negative cash balances. The customers to whom Robinhood inaccurately displayed “negative buying power” in this manner were “Instant” accountholders and “Gold” accountholders who had toggled margin “off.” These customers’ actual “negative buying power” was equal to the amount of their negative cash balances—and not, as Robinhood had displayed to them, double that amount.

Robinhood has corrected the issues that caused the firm to display the inaccurate cash and “negative buying power” values described above.

By displaying inaccurate cash and buying power calculations to customers, Robinhood violated FINRA Rule 2010, as well as FINRA Rules 2210 and 2010.

3. Robinhood negligently misrepresented the risks associated with options spread transactions and the actions the firm would take with those positions on its customers’ behalf.

From January 2018 to March 2021, Robinhood made misrepresentations and omissions of material fact about options spread transactions. First, Robinhood misstated the risk of loss associated with options spread transactions, and second, the firm provided customers with false information about the actions the firm would take as to those spreads on the expiration date. As a result of these negligent misrepresentations and omissions, at least 630 customers incurred losses totaling over \$5.73 million.⁸

⁸ This AWC requires Robinhood to pay as restitution the \$5,731,520.67 in losses that customers suffered as a result of its negligent misrepresentations and omissions about options spread transactions. Robinhood has represented to FINRA that it already has paid or intends to pay \$3,639,948.70 of that amount to 134 customers.

- a. Robinhood negligently misrepresented the potential risk of loss associated with options spread transactions.

Robinhood published false and misleading information on its website about the risk of loss associated with, in particular, debit spreads, and the firm falsely assured customers who had entered into options spreads that they did not need to take action to mitigate risk heading into options expiration:

What are the risks?

You'll never lose more than the premium you paid to enter the call debit spread. If the underlying stock is at or below your lower strike price at expiration you'll lose the maximum amount—the debit paid when you entered the position.

If this is the case, both options will expire worthless.

This statement⁹ was false and misleading in that it did not account for the risk of loss customers face when either: (1) a short option that is held to expiration is assigned and the long option expires worthless or (2) the short option is not assigned and the long option is exercised, whether by Robinhood or by the customer. Contrary to Robinhood's statement, either of these circumstances can result in customers suffering losses far exceeding the premium the customer paid to enter a spread.

In addition, on its website and in emails to customers, Robinhood falsely assured customers that they did not need to take action to mitigate risk in the days and hours preceding options expiration. On its website, Robinhood informed customers that if the stock went "below the low" (in the case of call credit spreads) or "above the high" (in the case of put credit spreads) at expiration, Robinhood would "automatically let both options expire worthless, so you don't need to worry about checking the app." These statements failed to disclose that if customers relied on Robinhood's statements and did not close their positions prior to expiration, their short options could still be assigned (e.g., by going in the money after hours)—resulting in losses.

Moreover, during the week that customers' options contracts were due to expire, Robinhood sent customers emails stating that, for short options positions, "[y]ou've already set aside the appropriate collateral for assignment." This statement was false in that it did not account for the fact that customers needed to take additional action to mitigate risk in the days and hours preceding expiration. For customers who had entered into options spread transactions, the "collateral for assignment" either was: (1) the long option that secured the spread (in the case of a debit spread) or (2) the long option, as

⁹ Robinhood's website contained a nearly identical claim about put debit spreads, falsely informing customers that "[y]ou'll never lose more than the premium you paid to enter the put debit spread. If the underlying stock is at or above your higher strike price at expiration you'll lose the maximum amount, the debit paid when you entered the position. If this is the case, both put options will expire worthless."

well as cash that the customer had set aside when entering the spread (in the case of a credit spread). However, Robinhood failed to disclose that if customers were assigned on the short leg, they would need to exercise the long option that they had purchased as collateral for the spread. Likewise, Robinhood failed to disclose that if customers did not close their positions heading into expiration, there could be a window of time in which the short options could be assigned but the customers would not be able to exercise their long options—thus leaving them exposed on their short obligations.

Many customers who may have relied on Robinhood’s statements experienced significant losses. On September 4, 2020, for example, over 130 Robinhood customers who held expiring Tesla options spreads incurred losses either because they were assigned on their short options after hours while their long options expired worthless, or because Robinhood exercised their long options while their short options were not assigned. On average, these customers lost tens of thousands of dollars, even though Robinhood had informed them that their maximum losses would be a fraction of that amount.

Robinhood has discontinued its misstatements about the risk of loss associated with options spread transactions.

- b. Robinhood negligently misrepresented to customers the conditions under which it would exercise the long legs of options spread positions instead of closing them.

Robinhood also falsely told customers who had entered into options spread transactions that the firm would sell, rather than exercise, their long options if they did not have the buying power (or underlying shares) necessary for exercise.¹⁰ In fact, Robinhood exercised many of those customers’ long options, causing the customers to incur significant losses.

Robinhood made these misrepresentations both on its website and in emails to customers. In educational materials posted to its website, Robinhood stated, “If your option is in the money, Robinhood will automatically exercise it for you at expiration unless . . . [y]ou don’t have sufficient buying power.” And the week that customers’ long options were set to expire, Robinhood sent them emails stating, “We will automatically exercise any option in the money if you have enough buying power. If you don’t, we’ll sell your option for you about 1 hour before it expires.” Robinhood repeated that message on the day of expiration: the firm sent customers with expiring long options emails advising customers that if they did not have sufficient shares of the underlying security (for put options) or sufficient buying power to purchase shares (for call options), Robinhood would “sell your option(s) about an hour before market close.”

¹⁰ These customers did not have sufficient buying power or the underlying shares necessary to exercise the long options because the short legs of their options spread transactions were not assigned. For example, if a customer was in a call spread, Robinhood automatically exercised the long call option, thus purchasing shares of the underlying security. This required the customer to fund the purchase—without the benefit of the sale proceeds from assignment of the short call option (which never occurred).

Despite these statements, Robinhood on many occasions exercised the long legs of customers' options spreads, assuming that the customers would be assigned on the short legs. Because this assumption in some circumstances turned out to be incorrect, the customers did not have sufficient buying power, or the shares necessary to deliver on their obligations. As a result, many customers received margin calls and ultimately incurred losses.

Robinhood has removed from its website its misstatements about the conditions under which it would exercise the long legs of options spread positions.

By providing false and misleading information to customers about the risks associated with options spread transactions and the actions the firm would take with those positions on customers' behalf, Robinhood violated FINRA Rule 2010, as well as FINRA Rules 2210, 2220, and 2010.

4. Robinhood issued erroneous margin calls and margin call warnings to over 100,000 customers.

From October 2016 to September 2019, Robinhood issued several erroneous margin notifications to customers. The two most significant events occurred within a three-month period in 2018 and affected more than 100,000 customers. Collectively, Robinhood's erroneous margin calls and margin call warnings caused customers to suffer losses of \$1.65 million.¹¹

On the morning of Friday, August 10, 2018, Robinhood sent erroneous margin call warnings to approximately 84,100 customer accounts, warning customers that their accounts were in "danger of a margin call" and instructing them to "[d]eposit cash or sell stock to ensure that [their] portfolio value [was] above [their] margin maintenance."¹² Although the firm sent corrective action notices to the affected customers before markets opened on Monday, August 13, approximately 19,000 accounts sold securities on August 10 after receiving the false margin call warnings.

Three months later, on November 13, 2018, Robinhood issued erroneous margin calls to approximately 20,850 customer accounts before markets opened that day, directing customers to "[d]eposit funds or sell stock immediately to cover [their] margin call[s]."¹³ Although the firm later corrected its systems to remove the erroneous margin calls from

¹¹ This AWC requires Robinhood to pay as restitution the \$1,653,366.51 in losses that customers suffered as a result of its erroneous margin calls and margin call warnings. Robinhood has not yet paid this restitution.

¹² The erroneous notifications—titled "Account Needs Attention"—included a hyperlink labeled "Avoid Margin Call," which led to a landing page within Robinhood's applications where customers could deposit money. The notifications also stated, "You will be issued a margin call if you end the trading day below your margin maintenance."

¹³ The erroneous notifications—titled "Immediate Action Required"—included a hyperlink labeled "Cover Margin Call," which led to a landing page within Robinhood's applications where customers could deposit money or sell stock. The notifications also stated, "If you do not take action, we will sell a portion of your stocks to bring your portfolio value above your margin maintenance."

its mobile applications and website, the firm did not issue any corrective notices informing affected customers that the margin calls had been sent in error. Approximately 6,600 accounts sold securities within three business days of receiving the erroneous margin calls.

No internal system at Robinhood triggered any alerts regarding these events despite the abnormally high number of margin notifications sent to customers. Instead, the firm learned about the errors only after customers complained, either informally or to the firm.¹⁴ In both instances, the errors were caused by system failures following the firm's introduction of a new technology feature.¹⁵

Robinhood's issuance of erroneous margin calls and margin call warnings violated FINRA Rule 2010, as well as FINRA Rules 2210 and 2010.

5. Robinhood displayed inaccurate account information to millions of customers.

During various time periods between January 2017 and May 2021, Robinhood displayed to millions of customers on its website and mobile applications a variety of other false and misleading information about their accounts.

- a. Robinhood displayed inaccurate account information to millions of customers because of delays or errors in the firm's systems, which affected the processing of corporate actions.

From January 2017 to May 2021, Robinhood failed to timely process, or made errors in processing, certain corporate actions (including stock splits, dividends, and mergers and acquisitions). This caused Robinhood to display inaccurate account information to customers who held securities subject to the corporate actions, including, for example, inaccurate portfolio balance, cash balance, buying power, and total return. While Robinhood was unable to identify all corporate actions that may have caused it to display inaccurate account information, sample data indicates that millions of accounts were affected.

- b. Robinhood displayed inaccurate historical performance figures to nearly six million customers.

From January 2019 to May 2021, Robinhood displayed inaccurate information to nearly six million customers regarding their accounts' historical performance, including the net

¹⁴ The firm discovered the August 10, 2018 errors after an employee saw customers discussing their confusion over the erroneous margin call warnings on a Reddit thread. The firm discovered the November 13, 2018 errors after receiving customer complaints.

¹⁵ The August 10, 2018 errors were caused by a coding mistake in one of Robinhood's internal systems, which caused some securities to be incorrectly returned as having zero value for purposes of mark-to-market valuations. The November 13, 2018 errors were caused by system errors related to Robinhood's transition from its prior clearing firm to its current affiliated clearing broker, Robinhood Securities, LLC.

increase or decrease in the accounts' total portfolio value. For affected accounts, the chart that Robinhood used to display historical performance either overstated customers' gains or understated customers' losses for a variety of reasons, including because Robinhood mistakenly did not properly account for cash dividends that had been paid to customers, various cash movements in customer accounts, and cash and position movements caused by corporate actions. The amounts by which the historical performance of the affected accounts was overstated or understated varied, and the inaccuracies in the information displayed did not affect the actual portfolio values of the accounts.

Robinhood corrected this issue as to the majority of the affected customers by the end of 2020.

c. Robinhood displayed other types of inaccurate account information to customers.

In addition to the categories of account information described above, Robinhood displayed to customers other inaccurate data:

- From December 2017 through October 2020, approximately 367,000 customers viewed pages on Robinhood's mobile applications and website in which the firm displayed erroneous margin maintenance requirements or erroneously indicated that the customers were not in margin calls (when they in fact were).
- From April 2019 to October 2020, Robinhood displayed to approximately 42,000 customers inaccurate figures representing their "total margin" (i.e., the maximum amount of margin available to them).
- From December 2014 to June 2020, Robinhood used the label "equity," rather than "market value," to describe a customer's position in a particular stock. As a result of Robinhood's use of this label, from September 2016 to June 2020, Robinhood displayed to approximately 664,000 "Robinhood Gold" customers who had borrowed on margin "equity" figures that in fact represented the market value of the customers' holdings in particular stocks.
- From September 2016 to October 2020, Robinhood inaccurately quantified "portfolio diversity"—i.e., the percentage of a customer's portfolio that is invested in a specific asset—to approximately 215,000 customers who had been actively using margin.

By displaying false and misleading account information to customers, Robinhood violated FINRA Rule 2010, as well as FINRA Rules 2210 and 2010.

6. Robinhood made numerous false and misleading claims to millions of individuals in promotional materials for its “Checking & Savings” program.

On December 13, 2018, Robinhood distributed marketing materials to its customers and to the public that contained misrepresentations and omissions concerning its (later canceled) launch of the “Robinhood Checking & Savings” program. These included false and misleading claims that (1) the “Checking & Savings” program had SIPC coverage (when it in fact did not); (2) equated the name “Checking & Savings” with bank deposit accounts; and (3) a 3% interest rate was available as part of the program “every damned day” and “every year” (without disclosing that the 3% rate was in fact contingent upon the U.S. Treasury yield and the Federal Funds Rate).

Robinhood distributed these false and misleading communications to millions of individuals through a digital marketing campaign that included social media, internet advertisements, targeted marketing (including push notifications on Robinhood’s mobile applications), and an incentivized referral program. All then-current Robinhood customers—over 8.2 million accounts—received emails promoting the “Checking & Savings” program and urging customers to sign up for “Early Access” (i.e., to sign up for a waitlist that would determine when they could open a “Checking & Savings” account). Although Robinhood abandoned the “Checking & Savings” program only a day after announcing it—after regulatory intervention by the SEC, FINRA, and SIPC—approximately 975,000 individuals signed up for Robinhood’s “Early Access” list, approximately 89% of whom were existing Robinhood customers.

Through its misrepresentations and omissions concerning the “Checking & Savings” program, Robinhood violated FINRA Rule 2010, as well as FINRA Rules 2210 and 2010.

7. Robinhood negligently made numerous misstatements to millions of individuals in promoting its “Free Stock” program.

From August 2017 to April 2020, Robinhood negligently made various misrepresentations and omissions in promotional materials for its “Free Stock” program—an initiative through which the firm gave free shares of stock to members of the public who opened new accounts. For example, Robinhood stated that upon sign-up, customers would get “stock like Apple, Ford or Sprint.” But the firm did not disclose that there was a 98% chance that the free stock awarded would have a value of only \$2.50–\$10.00. Promotional materials for the “Free Stock” program also advertised other aspects of Robinhood’s business but omitted material information about those offerings: the firm advertised “commission-free investing,” but did not include adequate disclosures about applicable fees and expenses. And the firm advertised “fractional share investing,” but did not include adequate disclosures about the program’s unique conditions, restrictions, and limitations.

Robinhood distributed communications containing these misleading claims and omissions to millions of individuals through the firm’s website and mobile applications; a

digital advertisement promoted on Google, Facebook, Snapchat, and Reddit; and a mailer sent to approximately 1 million people.

By April 2020, Robinhood had corrected the misstatements described above about its “Free Stock” program.

By virtue of the misrepresentations and omissions in promotional materials for its “Free Stock” program, Robinhood violated FINRA Rule 2010 as well as FINRA Rules 2210 and 2010.

* * *

These rule violations occurred, at least in part, because from September 2016 through the present, Robinhood failed to establish and maintain a supervisory system, and failed to establish, maintain, and enforce written supervisory procedures, that were reasonably designed to achieve compliance with these rules.

First, although the firm’s written supervisory procedures required that a registered principal of the firm approve retail communications, those supervisors tasked with this responsibility often lacked the experience and expertise necessary to determine that certain of the communications they approved were accurate and not misleading. Those supervisors approved certain communications—that Robinhood later published on its website and mobile applications—that were false or misleading, such as whether customers could “disable” margin in their accounts and the risk of loss associated with certain options transactions.

Second, Robinhood did not establish reasonable procedures to supervise the accuracy of the account information it displayed to customers via its website and mobile applications. The firm relied on mathematical models and formulas to calculate much of the data it displayed to customers, but it did not require that a supervisory principal review the accuracy of those models and formulas. Moreover, Robinhood failed to detect inconsistencies between the data it displayed to customers and the data contained in its back-office system. As a result, the firm displayed to customers account information, including cash balances, that was inaccurate and inconsistent with the firm’s back-office calculations.

Third, Robinhood did not establish reasonable procedures to identify when it communicated false information or omitted information that should have been communicated to customers, and it ignored red flags that should have alerted the firm of the need to implement preventive controls. For example, over the course of three years, Robinhood issued several erroneous margin calls and margin call warnings to thousands of customers, yet the firm did not take any action that would have enabled it to promptly identify and remediate such miscommunications. Indeed, Robinhood did not discover its erroneous margin calls and margin call warnings through its own supervisory controls and, instead, learned of the mistakes through its review of customer complaints and through discussions on internet forums.

Therefore, Robinhood violated FINRA Rules 3110 and 2010.

B. Robinhood approved customers for options trading without exercising due diligence.

FINRA Rule 2360(b)(16) requires that, in approving accounts for options trading, firms exercise due diligence to ascertain “the essential facts relative to the customer,” including his or her age, income, net worth, investment objectives, and investment experience and knowledge. FINRA Rule 2360(b)(16) requires that, “[b]ased upon such information,” a principal at the firm—either a Registered Options Principal or a General Securities Sales Supervisor—“specifically approve or disapprove in writing the customer’s account for options trading.” Moreover, in determining whether and to what extent to approve an account for options trading, a firm must consider the information provided by the customer “together with the other information available” to the firm.

Since introducing options trading on December 13, 2017, Robinhood has not established or maintained a supervisory system reasonably designed to achieve compliance with FINRA Rule 2360(b)(16). Although the firm’s written supervisory procedures assign registered options principals the responsibility of approving accounts for options trading, in practice, the firm relies on computer algorithms, with limited oversight by firm principals. This limited principal review, together with the firm’s failure to remediate flaws in its algorithms, resulted in Robinhood’s approval for options trading of thousands of customers who did not satisfy the firm’s eligibility criteria or whose account records contained red flags that options trading may not be appropriate for them.

1. Robinhood’s system for approving customers for options trading does not consider all information available to the firm.

Since December 2017, Robinhood has used an almost entirely automated system for approving customers for the two levels of options trading offered by the firm: level 2 (which allows customers to make basic options trades, including writing cash-secured puts and covered calls) and level 3 (which allows for more advanced trading, such as options spreads). The firm uses algorithms—known by Robinhood as “option account approval bots”—to review customer responses to various eligibility questions, and to automatically (and nearly instantaneously) approve or reject options applications based on those customer responses. However, because the bots do not take into account all information available to the firm, Robinhood has routinely approved customers for options trading who did not meet the firm’s eligibility criteria.

As an initial matter, the firm’s bots consider only the information customers provided in the customers’ most recent applications to trade options—without comparing that information to any prior options applications made by the customers or to other information that the customers previously provided to Robinhood. Therefore, for example, before September 2020, Robinhood’s bots approved customers to trade level 3 options so long as the customers represented that they had three years’ options trading experience—even if the customers were younger than 21 years old or had previously

represented (even only minutes earlier) that they had no options trading experience. This was the case even though, from April 2020 onwards, Robinhood’s operating procedures recognized that because customers must be at least 18 years old to open a brokerage account, any customer who was under 21 years old but certified to having at least three years’ options trading experience had provided “false suitability information [that] pose[d] significant regulatory risk to [the] firm.” Similarly, notwithstanding that level 3 options trading entitles customers to trade options spreads, Robinhood’s bots approved for level 3 options trading customers who had previously certified that they did not understand options spreads (and who had never subsequently updated those certifications) because those customers separately certified that they had at least three years’ options trading experience.

Notably, the firm’s bots do not flag for further scrutiny new options applications submitted by customers whose prior options applications were denied, and the firm does not require customers to wait before reapplying. Thus, customers often have reapplied (and been approved) for options trading mere minutes after being rejected—and often based on information that was inconsistent with what those customers had previously told Robinhood. Moreover, from December 2017 to February 2021, for those customers whose options applications had been rejected, Robinhood identified for customers the portions of their investment profiles that had rendered them ineligible for options trading under Robinhood’s eligibility criteria (e.g., a low risk tolerance) and prompted them to “update” those responses.

2. Robinhood conducts minimal review of its automated system for options approval.

Robinhood conducts two types of reviews of accounts it has approved to trade options. First, principals at Robinhood review on a weekly basis less than 0.1% of accounts to ensure that the bots function as programmed. Although Robinhood’s algorithms currently approve hundreds of thousands of options applications every month, the firm’s team of principals previously reviewed only 20 applications per week; in May 2021, the firm increased its principals’ review to approximately 500 applications per week. The principals’ reviews are limited only to ensuring that the bots function as programmed—the principals do not evaluate whether the information reviewed by the algorithms is consistent with other information available to Robinhood or whether options trading is appropriate for the customer.

Second, beginning in April 2020, over two years after it began allowing customers to trade options, Robinhood implemented a system whereby, on a monthly basis, it “downgrades” customers who had been approved for options trading in the prior month on the basis of “inconsistent logic in customers’ account profile characteristics.”¹⁶ As formulated in April 2020, the monthly automated “bulk downgrade” reviews had two

¹⁶ The genesis for these reviews was a September 2019 review in which Robinhood discovered that it had approved over 1,190 customers for options trading who were under 21 years of age but who had certified to having had more than three years’ options trading experience. Robinhood, however, did not implement a system for identifying “inconsistent logic” until over half a year later, in April 2020.

objectives. First, the reviews sought to identify customers who were younger than 21 but had been approved for level 3 options trading based on the customers' representations that they had at least three years' options trading experience. Second, the reviews sought (and continue to seek) to identify customers who, after having been approved for options trading, changed their investment profile information such that they no longer satisfied the firm's eligibility criteria (e.g., a customer who changed his or her risk tolerance from medium to low after having been approved for options trading). Following such reviews, Robinhood downgraded, on a monthly basis, many of the customers whom it identified as not having satisfied (or are no longer satisfying) the firm's eligibility criteria for options trading. As part of this process, the firm downgraded 39,940 accounts in February 2021 alone.¹⁷

Although Robinhood implemented the "bulk downgrade" process in April 2020 and revised its options eligibility criteria in September 2020, the firm continues to approve customers based on inconsistent customer information and then subsequently withdraws such approval as part of the firm's monthly automated "bulk downgrade" process—oftentimes, after options trading has occurred in those accounts.

3. Robinhood has approved customers for options trading who have not satisfied the firm's eligibility criteria or whose accounts have contained red flags that options trading was not appropriate.

Since December 2017, Robinhood has approved for options trading thousands of accounts that have not met the firm's eligibility criteria, or whose accounts contained red flags that options trading was not appropriate.

Robinhood itself identified many of these accounts in April 2020, after allowing these customers to trade options (in some cases, for months or even years). In April 2020 alone, Robinhood identified approximately 3,200 accounts that, since September 2019, had provided the firm with "false suitability information" by claiming to have at least three years' options trading experience when the accountholders were under 21 years old. The firm identified at least 1,200 other accounts that had been approved for level 2 or level 3 options trading even though the customers revised their risk tolerances, which made them ineligible under Robinhood's criteria. And the firm identified over 5,350 accounts that it had approved for level 3 options trading but were "only suitable for level 2."

The firm's April 2020 findings are consistent with a sample of four months of data from 2018, 2019, and 2020. In those four months, Robinhood approved:

¹⁷ Robinhood does not automatically downgrade all accounts that it identifies as having "inconsistent logic." The firm automatically downgrades accounts with no open options positions. But, for accounts with open options positions, it notifies customers that their accounts are "not appropriate" for options trading—and provides them with seven days to cure the deficiencies in their investment profiles that had rendered them ineligible to trade options. Those who cure within the seven-day period can continue to trade options; the firm does not apply further scrutiny to their accounts, even if the customers supply new information that is inconsistent with information that they previously provided to the firm.

- More than 700 accounts for level 2 or level 3 options trading where the customer reported having a risk tolerance that made him or her ineligible to trade options under Robinhood’s criteria.
- More than 1,680 accounts to trade level 3 options where the customer claimed to have three years’ options trading experience but was younger than 21.
- More than 3,380 accounts to trade level 3 options where the customer claimed to have three years’ investment experience but, within the preceding three years, had told the firm that he or she had no investment experience.

Moreover, Robinhood approved customers to trade options even when other information available to the firm raised red flags that options trading was not appropriate for them. For example:

- A customer opened his Robinhood account at age 20 and reported having “limited” investment experience and a low risk tolerance. Two days later, the customer applied, and was rejected, for options trading. Three minutes after being rejected, the customer changed his risk tolerance from low to medium and changed his options trading experience from “N/A” to at least three years. Thirteen seconds later, Robinhood approved the customer for level 3 options trading, even though he was only 20 years old—and, according to the firm’s operating procedures, had provided “false suitability information” by claiming to have had three years’ options trading experience. Since approving this customer for level 3 options trading in August 2018, Robinhood has not downgraded his options trading level.
- Another customer opened his Robinhood account at age 19. Seven minutes after account opening, he applied, and was rejected, for level 3 options trading after reporting that he did not understand options spreads and had a low risk tolerance. Thirteen minutes later, the customer applied for level 3 options trading again, this time changing his risk tolerance to “high” and his options trading experience from “N/A” to three or more years. Notably, the customer did not change his response that he did not understand options spreads. Nonetheless, Robinhood immediately (the same minute) approved this 19-year-old customer for level 3 options trading—which enabled him to trade options spreads. Robinhood downgraded the customer to level 2 options trading more than a year later as part of its April 2020 “bulk downgrade” review.
- Another customer opened her Robinhood account in August 2020 and reported having no investment experience and a low risk tolerance. She applied for options trading eight days after account opening, changing her risk tolerance from low to medium, and her options trading experience from “N/A” to “1–2 years.” Robinhood instantaneously (the same minute) approved her for level 2 options trading. Later that same day, after the customer applied, and was rejected, for options trading 14 more times, the customer changed her options trading experience to three or more years, after which Robinhood immediately (the same

minute) approved her for level 3 options trading. Robinhood did not flag the customer application for further scrutiny, even though she had reported—just eight days earlier—to having had no investment experience. Robinhood has not downgraded the customer’s options trading level.

Having failed both to reasonably supervise its system for approving customers for options trading and to exercise due diligence in approving customers for options trading, Robinhood has violated FINRA Rules 3110, 2360, and 2010.

C. Robinhood did not supervise the technology supporting its core broker-dealer business functions.

From January 2018 to February 2021, Robinhood relied exclusively on its website and mobile applications to receive, accept, and execute orders and for virtually all communications with its customers. As such, the firm’s supervision of the technology supporting its website and mobile applications is critical to the firm’s ability to satisfy its regulatory obligations as a FINRA member firm and SEC-registered broker-dealer.

FINRA Rule 3110 requires firms to reasonably supervise the core businesses in which they engage, including taking and executing customer orders, as well as any technology that firms rely upon to perform those functions. In July 2005, FINRA issued guidance making clear that a broker-dealer that outsources core functions, such as order taking and handling of customer funds and securities, must reasonably supervise the performance of those functions.¹⁸

Since its inception, Robinhood has outsourced to its parent company—which is not a FINRA member firm—the responsibility of operating and maintaining the firm’s website and mobile applications and their supporting technology. Yet Robinhood did not reasonably supervise those outsourced activities. During this period, Robinhood experienced several significant outages, as described below. Many of Robinhood’s customers experienced serious financial consequences by not being able to trade during the outages.

1. Robinhood experienced numerous system outages.

On March 2–3, 2020, Robinhood’s website and mobile applications shut down, preventing all of Robinhood’s customers (12.5 million accounts at the time) from accessing their accounts during a time of historic market volatility. During the outage, customers could not enter, modify, or cancel orders. Customers also could not communicate with the firm because the firm’s only support options at the time—email and an in-application customer contact portal—also experienced disruptions during portions of the outage and the firm had no live customer service telephone line.

The March 2–3 outage occurred because a key firm system was overloaded, which

¹⁸ NASD Notice to Members 05-48 (July 2005).

caused a cascading failure of other systems. Prior to March 2, the firm's parent company monitored the capacity of certain firm systems, but did not adequately consider the firm's significant growth or the potential impact of extreme market conditions on its systems.

Less than a week later, on March 9, 2020, Robinhood suffered a second, significant outage. This outage was caused by a third-party execution venue's change to the messaging protocol used to communicate with Robinhood. Robinhood's parent company did not test the change to the messaging protocol before implementation. Once the protocol went live, Robinhood's order entry system was unable to process incoming messages due to an internal coding error. This caused the firm's order entry system to shut down and remain inoperable for 45 minutes.¹⁹ During the outage, Robinhood customers could not submit new orders, existing orders could not be canceled, new orders could not be routed, and it was unclear to Robinhood's customers whether existing orders were being executed. Furthermore, approximately 166,000 customer orders temporarily were stuck in a "pending" state.

The March 2020 outages were not Robinhood's first significant outages. Since at least January 2018, Robinhood experienced periodic system outages caused by, among other things, technology changes, system maintenance problems, and overload issues. These outages ranged in duration from a few minutes to, in one instance, more than a day, and varied in impact from displaying inaccurate customer order information on Robinhood's website and mobile applications to rendering its systems nonfunctional. For example:

- On January 24, 2018, the firm was unable to process options orders because of technological updates that malfunctioned, resulting in an eight-and-a-half-hour outage. During that time, customers' options orders were placed in a "pending" state and could not be canceled. Ultimately, more than 400 options orders were not executed or processed.
- On December 12, 2018, Robinhood experienced a two-hour outage after the implementation of faulty code. The outage resulted in the cancellation of 5,252 pending options orders, prohibited new orders from being placed, and caused Robinhood to temporarily deactivate and restrict funds withdrawals for approximately 13,000 accounts.
- On January 31, 2019, an erroneous script overloaded the firm's system responsible for, among other things, equity and options order placement, accounting, and position tracking, causing a 21-minute outage that affected all core functions of Robinhood's website and mobile applications—including login, funding, trading, and viewing positions.

¹⁹ During this outage, a massive sell-off shortly after market open caused the major U.S. market indexes to fall 7%, which triggered a market-wide circuit breaker that halted trading for 15 minutes.

- On October 2–3, 2019, a programming change resulted in degraded performance of Robinhood’s website and mobile applications and 30-minute outages each day during which customers could not enter trades.

2. Robinhood’s outages and systems failures harmed customers.

As a consequence of these outages and systems failures, millions of Robinhood customers were prevented from accessing their accounts or from buying or selling securities, in some instances with significant financial consequences. For example, during the March 2020 outages, Robinhood customers:

- attempted to enter orders to purchase securities that later rose significantly in value, but the orders either could not be entered or were entered but not executed;
- attempted to enter orders to sell securities that later dropped significantly in value, but the orders either could not be entered or were entered but not executed;
- had previously entered “stop-loss” orders—that is, instructions to sell a security when it reached a designated price in order to avoid further losses—but the firm’s systems failed to execute the stop-loss orders at the designated price; and
- attempted to sell valuable options contracts before their expiration, but the firm’s system failed to accept or process the orders, and the contracts expired worthless.

In several cases, Robinhood’s failure to accept or execute these orders resulted in individual customers losing tens of thousands of dollars. As a result of the outages, Robinhood paid millions of dollars to customers.²⁰

3. Robinhood relied on its parent company to operate its website and mobile applications, without reasonable supervision.

Robinhood was aware of the significance of these outages and the need to improve its technology governance. A senior executive at Robinhood’s parent company described the December 12, 2018 outage as a “watershed incident” that highlighted the significant risks associated with technology changes. Similarly, Robinhood classified the March 2–3 outage as an event that “threatened to put Robinhood out of business.” Further, twice during the relevant period—in March 2019 and January 2020—FINRA warned Robinhood that the firm was not in compliance with FINRA Rule 3110 because of deficiencies in its supervision of technology changes, including changes relevant to some of the system outages described above.

Despite the repeated outages and FINRA’s warnings, Robinhood did not improve its

²⁰ This AWC requires Robinhood to pay as restitution \$5,213,557.98 to customers in connection with outages that occurred between January 2018 and December 2020. Robinhood has represented to FINRA that it already has paid that amount to affected customers.

supervisory system. Since at least January 2018, Robinhood has outsourced the creation, maintenance, updating, and testing of its website and mobile applications to its parent company, RHM, but did not reasonably supervise those outsourced activities. Though the firm's written supervisory procedures discussed supervision of some of the technology-related functions performed by Robinhood's parent company, no Robinhood principals were responsible for implementing those procedures, and none did so. For example, Robinhood did not supervise its parent company's response to the above-described outages or assess how its parent company was addressing the root causes of the outages.

Therefore, Robinhood violated FINRA Rules 3110 and 2010.²¹

D. Robinhood did not create a reasonably designed business continuity plan to cover technology-related emergencies and to address all “mission critical systems” as required under FINRA Rule 4370.

FINRA Rule 4370 states that each member must create and maintain a written BCP identifying procedures relating to an emergency or significant business disruption. A firm's BCP must be reasonably designed to enable the firm to meet existing obligations to customers and must be updated in the event of any material changes to the firm's operations, structure, business, or location. While BCPs should be tailored to the size and needs of a firm, all plans must, at a minimum, address “mission critical systems,” which are defined as:

[A]ny system that is necessary, depending on the nature of a member's business, to ensure prompt and accurate processing of securities transactions, including, but not limited to, order taking, order entry, execution, comparison, allocation, clearance and settlement of securities transactions, the maintenance of customer accounts, access to customer accounts and the delivery of funds and securities.

BCPs also must address alternate communications between customers and the firm during a significant business disruption. A violation of FINRA Rule 4370 also constitutes a violation of FINRA Rule 2010.

Robinhood's BCP was not reasonably designed in numerous respects. First, from at least January 2018 through August 2020, Robinhood unreasonably limited its BCP to events that affected its employees' ability to conduct business from the firm's physical locations due to, for example, a natural disaster or pandemic. Notably, the firm restricted the application of its BCP despite experiencing numerous technology-related outages beginning as early as January 2018 and continued to do so even after the March 2-3 2020 outage, which Robinhood regarded as an “existential” risk that could have “put [the firm] out of business.”

²¹ Since March 2020, Robinhood, together with RHM, has taken steps to address the root cause of each outage, reduce the risk of future outages, and increase the resilience of the relevant systems.

Second, from at least January 2018 through August 2020, Robinhood's BCP tracked FINRA's template for "small introducing firms" and, as a result, was not tailored to (and at times was not even applicable to) Robinhood's business and large customer base. For example, the BCP stated that, in the event of a significant business disruption, the firm would take orders through methods other than its website and mobile applications. Robinhood, however, did not have an alternative method of taking orders. Similarly, the BCP referenced an "alternative trading system" for order execution that did not exist. The BCP also provided that, if internet connectivity was unavailable, the firm would communicate with customers by phone. Robinhood, however, did not have a live customer service telephone line that customers could use to communicate with the firm.

Therefore, Robinhood violated FINRA Rules 4370 and 2010.

E. Robinhood did not report certain customer complaints to FINRA.

FINRA Rule 4530(d) requires member firms to report statistical and summary information regarding written customer complaints in such detail as FINRA shall specify by the 15th day of the month following the calendar quarter in which customer complaints are received by the member. To comply with Rule 4530(d), firms must report any written grievance by a customer that involves the firm or a person associated with the firm. FINRA uses the information to identify and initiate investigations of member firms, associated persons, and others who may pose a risk to investors. A violation of FINRA Rule 4530 also constitutes a violation of FINRA Rule 2010.

Robinhood did not report certain written customer complaints that it received between January 2018 and December 2020. For example, Robinhood failed to report to FINRA complaints that the firm:

- issued margin calls in accounts that customers did not know were margin-enabled;
- displayed inaccurate account information to customers, including inaccurate cash balances, buying power, and historical performance figures;
- failed to properly execute customer orders;
- closed options spread transactions without authorization;
- interfered with customers' attempts to transfer funds or securities to other broker-dealers; and
- failed to act promptly when customers' accounts were accessed by unknown third-parties to prevent the fraudulent transfer of funds from the accounts.

Many of these unreported complaints related specifically to the outages and systems failures described above. In some instances, these customers complained not just about

the losses they claimed to have suffered as a result of the outages and systems failures, but also about Robinhood's lack of responsiveness and its failure to communicate with its customers or address their concerns.

Robinhood's failure to report these complaints to FINRA resulted from a firm-wide policy that exempted certain broad categories of complaints from reporting, even though those categories of complaints fell within the scope of Rule 4530's reporting requirements. Under the policy, for example, Robinhood failed to report any written customer complaints that:

- concerned margin calls unless the customer threatened to file a complaint with a regulator or consult an attorney;
- the firm determined lacked merit, including complaints concerning unauthorized account access; or
- related to customers' cryptocurrency purchases or sales through the firm's cryptocurrency affiliate even if the transactions adversely affected the customers' brokerage accounts.

Robinhood's reliance on this policy caused it to fail to report to FINRA tens of thousands of customer complaints that the firm was required to report.

Additionally, Robinhood failed to timely report thousands of customer complaints received between January 2020 and December 2020 that the firm's automated review process erroneously failed to identify as possible complaints requiring further review.

Therefore, Robinhood violated FINRA Rules 4530(d) and 2010.

F. Robinhood failed to establish and implement a reasonably designed Customer Identification Program.

FINRA Rule 3310 requires member firms to develop and implement a written anti-money laundering (AML) program, including policies, procedures, and internal controls, reasonably designed to achieve and monitor compliance with the requirements of the Bank Secrecy Act (31 U.S.C. § 5311, *et seq.*) (BSA) and its implementing regulations. The BSA's implementing regulations require, among other things, that firms "establish, document, and maintain a written Customer Identification Program . . . appropriate for [the firm's] size and business" and that the program contain "procedures for verifying the identity of each customer to the extent reasonable and practicable."²² A violation of FINRA Rule 3310 also constitutes a violation of FINRA Rule 2010.

From June 1, 2016 to November 10, 2018, Robinhood did not establish or maintain a customer identification program that was appropriate for the firm's size and business.

²² 31 C.F.R. 1023.220(a)(1) and (a)(2).

The firm approved more than 5.5 million new customer accounts during this two-and-a-half-year period, relying on a customer identification process that was largely automated and suffered from multiple flaws. In fact, Robinhood did not have any employees whose primary job responsibilities related to its customer identification program during this period, and a single principal approved more than half of the more than 5.5 million new accounts that were opened.

Before May 2017, Robinhood automatically approved accounts, even when its clearing firm had flagged the accounts as needing “further review” because of the presence of a “fraud victim warning.” And through November 2018, Robinhood automatically approved accounts that its clearing firm had flagged as needing further review because, among other reasons:

- The customer’s purported Social Security number had not been issued by the Social Security Administration;
- The customer’s age could not be verified;
- The customer’s address was a storage facility, post office, or check-cashing facility; or
- The customer’s address had been used ten or more times by individuals with different Social Security numbers.

Although Robinhood’s clearing firm had recommended “thorough verification” of those applications, Robinhood’s customer identification system “overrode” those alerts and approved the accounts without any effort to verify that the information provided by the customers was accurate. Sample testing showed that Robinhood automatically opened (i.e., without any manual review) 94% of accounts that Robinhood’s clearing firm had flagged for a “high probability” that the customer’s Social Security number belonged to another person. Robinhood also automatically opened more than 100 accounts that were flagged based on a “high probability” that the customer’s Social Security number belonged to a deceased person.

Robinhood’s automatic approval of accounts that had been flagged for potential fraud was contrary to the firm’s procedures, which specified that Robinhood “request an ID such as a driver’s license or passport” when the firm could not verify a customer’s identity using credit reporting agency data. Robinhood did not enforce this requirement, however, and between June 2016 and November 2018, the firm approved more than 90,000 accounts that had been flagged for potential fraud without obtaining any physical form of identification.

Therefore, Robinhood violated FINRA Rules 3310 and 2010.

G. Robinhood’s website and mobile applications did not provide a consolidated display of market data.

Rule 603(c) of Regulation NMS of the Exchange Act (the Vendor Display Rule) generally requires broker-dealers to provide a consolidated display of market data for NMS stocks for which they provide quotation information for customers. The information included in the consolidated display can impact retail investors like Robinhood’s customers. As noted by the SEC in adopting Regulation NMS, “[p]articularly for retail investors, the [national best bid and national best offer, or NBBO] continues to retain a great deal of value in assessing the current market for small trades and the quality of execution of such trades.”²³ A violation of Rule 603(c) of Regulation NMS also constitutes a violation of FINRA Rule 2010.

Rule 600(b)(14) of Regulation NMS provides that the consolidated display includes “(i) the prices, sizes, and market identifications of the national best bid and national best offer for a security; and (ii) [c]onsolidated last sale information for a security,” while Rule 600(b)(15) of Regulation NMS provides that “consolidated last sale information” includes “the price, volume, and market identification of the most recent transaction report for a security that is disseminated pursuant to an effective national market system plan.”

From January 2018 through March 2019, Robinhood’s website and mobile applications did not provide certain consolidated display information required under Rule 603, such as quotations that included identifiers for the markets displaying the best bid and best offer and where the last reported sale occurred. Additionally, from January 2018 through November 2019, Robinhood’s website did not display the size of the last reported sale.

Therefore, Robinhood violated Rule 603(c) of Regulation NMS and FINRA Rule 2010.

SANCTIONS CONSIDERATIONS

In determining the appropriate sanctions in this matter, FINRA considered, among other factors, that Robinhood, over a period of at least five years, failed to establish and maintain a supervisory system that was reasonably designed to achieve compliance with FINRA rules and applicable securities laws and regulations, and as a result, experienced systemic supervisory failures in several critical parts of its business. FINRA also considered that, during the same period, Robinhood failed to address numerous red flags that it was not in compliance with FINRA rules and applicable securities laws and regulations, and it failed to timely correct or address deficiencies even when the firm identified them. Finally, FINRA considered the widespread and significant harm suffered by customers, including millions of customers who received false or misleading information from the firm, thousands of customers who were approved to trade options

²³ Regulation NMS, Exchange Act Release No. 51,808, 70 Fed. Reg. 37,496, 37,567 (June 29, 2005); *see also* FINRA Regulatory Notice 15-52, at 2 (Dec. 2015). “National best bid and national best offer” is defined in Rule 600(b)(43) under SEC Regulation NMS. 17 C.F.R. § 242.600(b)(43) (2020).

even when it was not appropriate for them to do so, and millions of customers affected by the systems outages in March 2020.

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

- a censure;
- a \$57 million fine;
- restitution of \$12,598,445.16 plus interest as described below;²⁴
- an undertaking to retain a third-party consultant as described below; and
- Within 60 days of FINRA's issuance of its notice of acceptance of this AWC, an officer of Robinhood shall submit to Pearline M. Hong, Senior Counsel, FINRA, at the address set forth below, a signed, written certification that the firm has ceased making the false or misleading statements set forth in this AWC.

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

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

Restitution is ordered to be paid to the customers listed on Attachment A to this AWC in the total amount of \$3,744,938.48,²⁵ 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 the date set forth in Attachment A for each customer until the date this AWC is accepted by the National Adjudicatory Council (NAC).

A registered principal on behalf of Respondent shall submit satisfactory proof of payment of restitution and prejudgment interest (separately specifying the date and amount of each paid to each customer listed on Attachment A) or of reasonable and documented efforts

²⁴ As noted, this AWC orders Robinhood to pay restitution in the amount of: \$5,731,520.67 to customers who suffered losses as a result of the firm's misrepresentations and omissions about options spread transactions; \$1,653,366.51 to customers who suffered losses as a result of the firm's erroneous margin calls and margin call warnings; and \$5,213,557.98 to customers in connection with system outages between January 2018 and December 2020.

²⁵ As noted, Robinhood already has paid or intends to pay affected customers a total of \$8,853,506.68 (i.e., \$3,639,948.70 to customers who suffered losses as a result of the firm's misrepresentations and omissions about options spread transactions, and the full \$5,213,557.98 to customers in connection with system outages). The remaining amount to be paid by Robinhood is \$3,744,938.48 (i.e., the remaining amount to customers who suffered losses as a result of the firm's misrepresentations and omissions about options spread transactions and the full \$1,653,366.51 to customers who suffered losses as a result of the firm's erroneous margin calls and margin call warnings).

undertaken to effect restitution. Such proof shall be submitted by email to EnforcementNotice@FINRA.org from a work-related account of the registered principal of Respondent. The email must identify Respondent and the case number and include a copy of the check, money order, or other method of payment. This proof shall be provided by email to EnforcementNotice@FINRA.org no later than 120 days after the date of the notice of acceptance of the AWC.

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

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

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

Respondent has undertaken to do the following:

- a. Continue to retain, at its own expense, the Third-Party Consultant to conduct a comprehensive review of the adequacy of Robinhood's compliance with all of the areas identified in the AWC.
- b. Cooperate with the Third-Party Consultant in all respects, including providing the Third-Party Consultant with access to Respondent's and its affiliates' files, books, records, and personnel, as reasonably requested for the above-mentioned reviews. Robinhood shall require the Third-Party Consultant to report to FINRA on its activities as FINRA may request and shall place no restrictions on the Third-Party Consultant's communications with FINRA. Further, Respondent, upon request, shall make available to FINRA any and all communications between the Third-Party Consultant and Respondent and documents reviewed by the Third-Party Consultant in connection with this review.
- c. Refrain from terminating the relationship with the Third-Party Consultant without FINRA's written approval. Respondent shall not be in and shall not have an attorney-client relationship with the Third-Party Consultant and shall not seek to invoke the attorney-client privilege or other doctrine

or privilege to prevent the Third-Party Consultant from transmitting any information, reports, or documents to FINRA.

- d. Require the Third-Party Consultant to submit an initial written report to Respondent and FINRA at the conclusion of the Third-Party Consultant's review, which shall be no more than 180 days after the date of the notice of acceptance of this AWC. The initial report shall, at a minimum: (i) evaluate and address the adequacy of Respondent's obligations related to all of the areas identified in the AWC; (ii) provide a description of the review performed and the conclusions reached; and (iii) make recommendations as may be needed regarding how Respondent should modify or supplement its processes, controls, policies, systems, procedures, and training to manage its regulatory and other risks in relation to the areas identified in the AWC; and
- (i) Within 90 days after delivery of the initial report, Respondent shall adopt and implement the recommendations of the Third-Party Consultant or, if Respondent considers a recommendation to be, in whole or in part, unduly burdensome or impractical, propose an alternative procedure to the Third-Party Consultant designed to achieve the same objective. Respondent shall submit such proposed alternative procedures in writing simultaneously to the Third-Party Consultant and FINRA.
- (ii) Respondent shall require the Third-Party Consultant to (A) reasonably evaluate the alternative procedures and determine whether it will achieve the same objective as the Third-Party Consultant's original recommendation and (B) provide Respondent and FINRA with a written report reflecting its evaluation and determination within 30 days of submission of any Respondent's proposed alternative procedures. In the event the Third-Party Consultant and Respondent are unable to agree, Respondent must abide by the Third-Party Consultant's ultimate determination with respect to any proposed alternative procedure and must adopt and implement all recommendations deemed appropriate by the Third-Party Consultant.
- e. Within 30 days after the issuance of the later of the Third-Party Consultant's initial report or any written report regarding proposed alternative procedures, Respondent shall provide the Third-Party Consultant and FINRA with a written implementation report, certified by an officer of Respondent, attesting to, containing documentation of, and setting forth the details of Respondent's implementation of the Third-Party Consultant's recommendations. The certification shall identify the undertakings, provide written evidence of compliance in the form of a narrative, and be supported by exhibits sufficient to demonstrate compliance. FINRA may make reasonable requests for further evidence of

compliance, and Respondent agrees to provide such evidence.

Upon written request showing good cause, FINRA may extend any of the procedural dates set forth above in connection with its undertaking to retain the Third-Party Consultant.

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

II.

WAIVER OF PROCEDURAL RIGHTS

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

- A. To have a complaint issued specifying the allegations against it;
- B. To be notified of the complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made, and to have a written decision issued; and
- D. To appeal any such decision to the NAC and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

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

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

III.

OTHER MATTERS

Respondent understands that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of

the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;

- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and
- C. If accepted:
 - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
 - 2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
 - 3. FINRA may make a public announcement concerning this agreement and its subject matter in accordance with FINRA Rule 8313; and
 - 4. Respondent may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. Respondent may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects Respondent's testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.
- D. Respondent may attach a corrective action statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that it may not deny the charges or make any statement that is inconsistent with the AWC in this statement. This statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA.

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

June 22, 2021

Date

Dan Gallagher

Robinhood Financial LLC
Respondent

Print Name: Dan Gallagher

Title: CLO

Reviewed by:

Andrew Ceresney

Andrew J. Ceresney
Julie M. Riewe
Counsel for Respondent
Debevoise & Plimpton LLP
919 Third Ave.
New York, NY 10022

Accepted by FINRA:

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



06/30/2021

Date

Pearlina M. Hong
Senior Counsel
FINRA
Department of Enforcement
581 Main St., Suite 710
Woodbridge, NJ 07095

Rachel Browder
Principal Counsel
FINRA
Department of Enforcement
15200 Omega Dr.
Rockville, MD 20850

ELECTION OF PAYMENT FORM

Respondent intends to pay the fine set forth in the attached Letter of Acceptance, Waiver, and Consent by the following method (check one):

- A check for the full amount;
- Wire transfer for the full amount;
- Credit card authorization for the full amount;¹ or
- The installment payment plan (only if approved by the Department of Enforcement and the Office of Disciplinary Affairs).²

Respectfully submitted,

June 22, 2021

Date

Dan Gallagher

Robinhood Financial LLC
Respondent

Dan Gallagher

Print Name: _____

Title: CLO _____

¹ Credit card payment is only available for fines of \$50,000 or less. Only Mastercard, Visa, and American Express are accepted. If this method is chosen, the appropriate forms will be mailed to Respondent by FINRA’s Finance Department. Credit card information should not be included on this Election of Payment Form.

² The installment payment plan is only available for fines of \$5,000 or more. Certain interest payments, minimum initial and monthly payments, and other requirements apply. Respondent must discuss these requirements with the Department of Enforcement prior to requesting this method of payment. If this method is chosen and approved, the appropriate forms will be mailed to Respondent by FINRA’s Finance Department.

Attachment A

Schedule 1¹

Customer	Option Expiration Date	Restitution
000001	7/31/2020	\$ 1,408.00
000002	12/18/2020	\$ 190.00
000003	12/18/2020	\$ 3,340.71
000004	12/18/2020	\$ 212.00
000005	2/12/2021	\$ 800.00
000006	2/5/2021	\$ 307.00
000007	7/31/2020	\$ 270.00
000008	12/27/2019	\$ 23.00
000009	5/29/2020	\$ 175.81
000010	7/31/2020	\$ 795.00
000011	7/31/2020	\$ 116.00
000012	12/18/2020	\$ 556.50
000013	9/4/2020	\$ 970.58
000014	3/13/2020	\$ 1,209.99
000015	2/19/2021	\$ 83.58
000016	11/30/2020	\$ 1,379.98
000017	2/14/2020	\$ 10,253.60
000018	3/13/2020	\$ 2,514.01
000019	7/31/2020	\$ 903.00
000020	7/31/2020	\$ 101.84
000021	12/18/2020	\$ 340.00
000022	11/30/2020	\$ 1,057.35
000023	5/15/2020	\$ 28.50
000024	6/28/2019	\$ 323.98
000025	6/12/2020	\$ 584.70
000026	7/31/2020	\$ 118.00
000027	9/4/2020	\$ 20.33
000028	12/18/2020	\$ 170.00
000029	7/17/2020	\$ 1,499.43
000030	5/27/2020	\$ 8.00
000031	7/31/2020	\$ 250.00
000032	8/7/2020	\$ 35.00
000033	3/13/2020	\$ 742.98
000034	9/4/2020	\$ 51.85
000035	7/17/2020	\$ 420.00
000036	12/31/2019	\$ 1,000.00
000037	12/18/2020	\$ 1,103.92
000038	11/30/2020	\$ 251.00
000039	7/31/2020	\$ 254.00
000040	1/17/2020	\$ 2.50
000041	7/31/2020	\$ 106.50
000042	7/31/2020	\$ 12.00
000043	7/17/2020	\$ 1,980.54

¹ Schedule 1 identifies customers whom Robinhood has not already paid, and who suffered losses as a result of the firm's misrepresentations and omissions about options spread transactions.

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000044	7/31/2020	\$ 188.99
000045	12/18/2020	\$ 1,740.00
000046	7/31/2020	\$ 103.50
000047	9/4/2020	\$ 57.00
000048	12/18/2020	\$ 3,798.18
000049	7/31/2020	\$ 112.73
000050	11/6/2020	\$ 8,512.98
000051	5/15/2020	\$ 1,813.98
000052	11/13/2020	\$ 242.22
000053	10/30/2020	\$ 1,380.00
000054	12/18/2020	\$ 390.32
000055	7/17/2020	\$ 80.00
000056	7/31/2020	\$ 8,275.00
000057	3/15/2019	\$ 40.87
000058	7/17/2020	\$ 251.60
000059	7/17/2020	\$ 774.00
000060	12/18/2020	\$ 161.85
000061	3/13/2020	\$ 554.98
000062	2/12/2021	\$ 1,947.50
000063	7/31/2020	\$ 1,032.00
000064	7/17/2020	\$ 24.00
000065	3/20/2020	\$ 47.79
000066	12/31/2019	\$ 804.50
000067	12/18/2020	\$ 200.00
000068	12/18/2020	\$ 124.46
000069	10/30/2020	\$ 277.99
000070	12/27/2019	\$ 52.53
000071	12/18/2020	\$ 316.00
000072	5/27/2020	\$ 19.98
000073	7/31/2020	\$ 386.00
000074	12/18/2020	\$ 8,943.21
000075	8/21/2020	\$ 137.02
000076	6/21/2019	\$ 12.00
000077	7/17/2020	\$ 1,185.98
000078	12/18/2020	\$ 1,994.00
000079	7/31/2020	\$ 204.77
000080	7/31/2020	\$ 190.99
000081	7/31/2020	\$ 644.00
000082	8/7/2020	\$ 594.60
000083	7/17/2020	\$ 691.00
000084	10/4/2019	\$ 122.42
000085	11/18/2020	\$ 115.98
000086	1/8/2021	\$ 103.64

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000087	7/17/2020	\$ 934.98
000088	7/31/2020	\$ 376.00
000089	12/18/2020	\$ 28,799.50
000090	12/31/2020	\$ 2,907.00
000091	12/18/2020	\$ 352.00
000092	5/29/2020	\$ 216.29
000093	3/13/2020	\$ 8,539.00
000094	6/28/2019	\$ 1,064.00
000095	7/20/2018	\$ 4,506.99
000096	7/17/2020	\$ 740.00
000097	6/26/2020	\$ 20.00
000098	3/13/2020	\$ 275.98
000099	12/27/2019	\$ 42.99
000100	7/31/2020	\$ 387.98
000101	11/6/2020	\$ 728.28
000102	4/20/2018	\$ 6.38
000103	7/31/2020	\$ 193.86
000104	3/20/2020	\$ 183.99
000105	12/18/2020	\$ 377.50
000106	10/30/2020	\$ 282.91
000107	6/28/2019	\$ 349.98
000108	12/18/2020	\$ 83.85
000109	7/31/2020	\$ 364.00
000110	7/17/2020	\$ 423.26
000111	6/5/2019	\$ 376.35
000112	7/31/2020	\$ 595.86
000113	10/4/2019	\$ 3,384.19
000114	10/30/2020	\$ 326.97
000115	12/18/2020	\$ 3,342.71
000116	9/4/2020	\$ 119.89
000117	8/21/2020	\$ 6,819.80
000118	12/11/2020	\$ 300.00
000119	1/22/2021	\$ 1.36
000120	6/28/2019	\$ 12,048.00
000121	3/13/2020	\$ 1,524.50
000122	7/31/2020	\$ 205.00
000123	11/30/2020	\$ 250.98
000124	3/13/2020	\$ 533.17
000125	7/17/2020	\$ 561.00
000126	11/30/2020	\$ 2,730.00
000127	6/28/2019	\$ 2,386.78
000128	11/13/2020	\$ 9.50
000129	6/28/2019	\$ 242.00

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000130	12/18/2020	\$ 34,024.96
000131	7/17/2020	\$ 673.41
000132	11/29/2019	\$ 0.45
000133	2/8/2019	\$ 53.91
000134	2/19/2021	\$ 2.00
000135	8/7/2020	\$ 350.00
000136	11/18/2019	\$ 304.04
000137	5/27/2020	\$ 33.98
000138	3/20/2020	\$ 270.00
000139	6/28/2019	\$ 540.00
000140	3/5/2021	\$ 270.47
000141	7/17/2020	\$ 248.00
000142	7/17/2020	\$ 1,400.00
000143	2/26/2021	\$ 574.91
000144	5/29/2020	\$ 194.13
000145	12/18/2020	\$ 160.07
000146	12/18/2020	\$ 312.00
000147	12/18/2020	\$ 2,909.76
000148	12/18/2020	\$ 86.50
000149	6/19/2020	\$ 19.76
000150	7/31/2020	\$ 120.00
000151	6/28/2019	\$ 411.96
000152	10/30/2020	\$ 185.00
000153	9/4/2020	\$ 32.99
000154	12/18/2020	\$ 44.00
000155	12/18/2020	\$ 115.48
000156	8/28/2020	\$ 1,087.84
000157	12/18/2020	\$ 899.00
000158	5/29/2020	\$ 162.52
000159	10/30/2020	\$ 114.81
000160	6/28/2019	\$ 268.00
000161	11/27/2020	\$ 170.00
000162	10/30/2020	\$ 213.99
000163	11/27/2020	\$ 18,800.00
000164	7/31/2020	\$ 373.96
000165	12/18/2020	\$ 6.74
000166	2/19/2021	\$ 11.99
000167	7/17/2020	\$ 639.00
000168	5/29/2020	\$ 166.94
000169	10/30/2020	\$ 25.92
000170	6/5/2019	\$ 76.00
000171	10/9/2020	\$ 10.50
000172	12/18/2020	\$ 2,451.89

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000173	12/18/2020	\$ 93.00
000174	10/30/2020	\$ 379.84
000175	12/31/2020	\$ 4,805.71
000176	12/18/2020	\$ 144.00
000177	7/17/2020	\$ 119.85
000178	6/28/2019	\$ 215.98
000179	12/18/2020	\$ 3,075.00
000180	12/18/2020	\$ 354.45
000181	7/31/2020	\$ 185.00
000182	10/30/2020	\$ 3,025.00
000183	10/30/2020	\$ 274.84
000184	2/14/2020	\$ 414.00
000185	9/4/2020	\$ 1,025.99
000186	7/31/2020	\$ 180.90
000187	7/31/2020	\$ 800.00
000188	3/13/2020	\$ 2,435.65
000189	7/31/2020	\$ 130.00
000190	7/31/2020	\$ 116.80
000191	12/18/2020	\$ 5,969.31
000192	9/28/2020	\$ 4,962.99
000193	12/18/2020	\$ 6.80
000194	6/19/2020	\$ 5.83
000195	12/18/2020	\$ 2,378.00
000196	12/18/2020	\$ 1,271.00
000196	9/11/2020	\$ 26.07
000197	11/8/2019	\$ 1.00
000198	9/21/2020	\$ 131.99
000199	2/12/2021	\$ 89.80
000200	5/27/2020	\$ 123.00
000201	7/31/2020	\$ 857.97
000202	3/5/2021	\$ 50.99
000203	12/18/2020	\$ 56.80
000204	12/18/2020	\$ 311.00
000205	12/18/2020	\$ 57,520.75
000206	10/4/2019	\$ 268.18
000207	7/17/2020	\$ 370.00
000208	10/30/2020	\$ 119.17
000209	4/24/2020	\$ 706.65
000210	7/17/2020	\$ 675.00
000211	7/31/2020	\$ 596.00
000212	12/18/2020	\$ 31,569.27
000213	10/2/2020	\$ 9.00
000214	12/18/2020	\$ 119.32

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000215	9/4/2020	\$ 22.85
000216	7/31/2020	\$ 188.00
000217	2/19/2021	\$ 100.00
000218	10/30/2020	\$ 216.99
000219	7/31/2020	\$ 202.50
000220	7/31/2020	\$ 2,404.00
000221	12/18/2020	\$ 7,704.40
000222	10/30/2020	\$ 375.00
000223	8/30/2019	\$ 113.96
000224	7/17/2020	\$ 514.20
000225	12/18/2020	\$ 676.00
000226	7/31/2020	\$ 200.00
000227	2/19/2021	\$ 29.73
000228	11/20/2020	\$ 300.00
000229	5/22/2020	\$ 195.00
000230	5/20/2020	\$ 170.00
000231	7/31/2020	\$ 116.00
000232	12/18/2020	\$ 9,903.07
000233	8/21/2020	\$ 39.00
000234	10/16/2020	\$ 12,812.17
000235	12/18/2020	\$ 188.67
000236	7/31/2020	\$ 303.80
000237	6/19/2020	\$ 5.98
000238	7/31/2020	\$ 201.46
000239	10/30/2020	\$ 1,200.00
000240	12/18/2020	\$ 726.00
000241	10/30/2020	\$ 615.79
000242	7/31/2020	\$ 240.00
000243	9/4/2020	\$ 1.60
000244	7/31/2020	\$ 183.96
000245	2/21/2020	\$ 155.00
000246	12/18/2020	\$ 15.00
000247	7/31/2020	\$ 293.45
000248	7/31/2020	\$ 121.93
000249	2/19/2021	\$ 12.00
000250	7/17/2020	\$ 880.00
000251	12/18/2020	\$ 241.00
000252	5/29/2020	\$ 195.50
000253	12/18/2020	\$ 2,886.30
000254	12/18/2020	\$ 2,408.36
000255	9/4/2020	\$ 60.17
000256	11/6/2020	\$ 27,379.95
000257	12/18/2020	\$ 45.74

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000258	7/10/2020	\$ 800.00
000259	7/31/2020	\$ 1,575.00
000260	12/11/2020	\$ 88.50
000261	12/18/2020	\$ 195.00
000262	9/4/2020	\$ 1,605.88
000263	10/30/2020	\$ 225.00
000264	12/18/2020	\$ 79.00
000265	7/31/2020	\$ 131.98
000266	12/18/2020	\$ 200.00
000267	7/31/2020	\$ 252.00
000268	12/18/2020	\$ 193.37
000269	2/19/2021	\$ 15.81
000270	7/31/2020	\$ 115.95
000271	12/18/2020	\$ 620.00
000272	12/18/2020	\$ 212.99
000273	8/21/2020	\$ 16.00
000274	11/30/2020	\$ 1,064.00
000275	7/17/2020	\$ 360.00
000276	8/14/2020	\$ 139.56
000277	12/18/2020	\$ 571.50
000278	5/27/2020	\$ 412.93
000279	7/17/2020	\$ 166.00
000280	8/26/2020	\$ 2,730.00
000281	9/4/2020	\$ 29.85
000282	7/31/2020	\$ 183.00
000283	8/14/2020	\$ 17.00
000284	5/27/2020	\$ 74.46
000285	6/28/2019	\$ 278.00
000286	12/18/2020	\$ 698.34
000287	12/18/2020	\$ 568.00
000288	10/30/2020	\$ 208.99
000289	11/18/2019	\$ 2,256.00
000290	12/18/2020	\$ 24,714.94
000291	12/18/2020	\$ 207.00
000292	5/29/2020	\$ 110.82
000293	7/31/2020	\$ 190.00
000294	12/13/2019	\$ 10.98
000295	12/18/2020	\$ 200.00
000296	7/17/2020	\$ 886.00
000297	7/17/2020	\$ 780.75
000298	7/31/2020	\$ 128.00
000299	4/24/2020	\$ 49.99
000300	4/5/2019	\$ 5,019.59

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000301	12/7/2020	\$ 208.68
000302	12/18/2020	\$ 8,641.96
000303	12/18/2020	\$ 3,734.19
000304	11/6/2020	\$ 13,097.66
000305	6/19/2020	\$ 38.78
000306	9/4/2020	\$ 3,119.95
000307	6/19/2020	\$ 41.00
000308	5/31/2019	\$ 30.00
000309	3/13/2020	\$ 2,141.99
000310	6/28/2019	\$ 3,917.11
000311	9/4/2020	\$ 1,040.29
000312	12/18/2020	\$ 3,284.93
000313	3/13/2020	\$ 1,457.98
000314	12/18/2020	\$ 6,114.04
000315	12/18/2020	\$ 986.00
000316	3/13/2020	\$ 185,806.24
000317	6/6/2018	\$ 164.50
000318	12/18/2020	\$ 6,300.00
000319	7/31/2020	\$ 18,220.00
000320	9/4/2020	\$ 817.99
000321	9/4/2020	\$ 13,375.36
000322	9/4/2020	\$ 242.55
000323	4/18/2019	\$ 4,684.53
000324	7/17/2020	\$ 508.15
000325	3/13/2020	\$ 3,159.00
000326	3/13/2020	\$ 2,806.24
000327	3/13/2020	\$ 3,306.00
000328	9/4/2020	\$ 659.93
000329	11/29/2019	\$ 1,329.94
000330	12/18/2020	\$ 2,397.00
000331	12/18/2020	\$ 2,176.34
000332	3/13/2020	\$ 3,306.56
000333	11/6/2020	\$ 23,042.05
000334	3/13/2020	\$ 26,173.00
000335	9/4/2020	\$ 698.99
000336	12/18/2020	\$ 2,726.27
000337	6/19/2020	\$ 66.96
000338	3/13/2020	\$ 12,147.50
000339	4/5/2019	\$ 1,204.64
000340	12/18/2020	\$ 2,030.96
000341	11/18/2020	\$ 38.00
000342	9/4/2020	\$ 587.99
000343	3/13/2020	\$ 16,332.00

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000344	12/18/2020	\$ 2,095.84
000345	3/13/2020	\$ 3,306.00
000346	4/5/2019	\$ 521.25
000347	3/13/2020	\$ 3,556.00
000348	7/17/2019	\$ 136.96
000349	3/13/2020	\$ 2,491.99
000350	5/1/2020	\$ 3,342.85
000351	12/18/2020	\$ 3,252.87
000352	11/6/2020	\$ 7,989.98
000353	6/10/2020	\$ 1,009.70
000354	4/5/2019	\$ 1,045.99
000355	12/18/2020	\$ 1,730.21
000356	9/4/2020	\$ 1,070.00
000357	10/16/2020	\$ 266.02
000358	12/18/2020	\$ 4,019.47
000359	3/13/2020	\$ 2,100.35
000360	12/18/2020	\$ 3,290.85
000361	10/2/2020	\$ 79,917.72
000362	11/18/2020	\$ 754.80
000363	11/18/2020	\$ 452.70
000364	7/17/2019	\$ 293.56
000365	4/5/2019	\$ 861.99
000366	9/4/2020	\$ 729.75
000367	7/17/2020	\$ 270.00
000368	4/5/2019	\$ 1,563.66
000369	9/4/2020	\$ 653.37
000370	4/5/2019	\$ 1,139.00
000371	11/6/2020	\$ 146,645.42
000372	3/13/2020	\$ 19,326.00
000373	3/13/2020	\$ 2,244.98
000374	4/18/2019	\$ 3,379.99
000375	12/18/2020	\$ 3,109.48
000376	12/18/2020	\$ 1,395.47
000377	4/5/2019	\$ 742.77
000378	9/4/2020	\$ 439.92
000379	3/13/2020	\$ 3,019.30
000380	9/4/2020	\$ 1,302.44
000381	12/18/2020	\$ 1,258.59
000382	3/13/2020	\$ 5,015.74
000383	12/18/2020	\$ 1,450.29
000384	12/18/2020	\$ 2,335.06
000385	6/19/2020	\$ 107.94
000386	3/13/2020	\$ 3,272.21

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000387	9/4/2020	\$ 11,052.31
000388	6/28/2019	\$ 17,324.00
000389	12/18/2020	\$ 4,652.32
000390	7/17/2020	\$ 1,499.80
000391	11/18/2020	\$ 11.00
000392	11/18/2020	\$ 1,656.00
000393	4/18/2019	\$ 2,389.19
000394	7/17/2020	\$ 5,959.89
000395	3/13/2020	\$ 14,086.12
000396	12/18/2020	\$ 3,434.89
000397	9/4/2020	\$ 5,308.89
000398	3/15/2019	\$ 200.00
000399	12/18/2020	\$ 2,935.00
000400	9/4/2020	\$ 1,721.40
000401	11/18/2020	\$ 81.08
000402	7/17/2020	\$ 2,936.63
000403	3/13/2020	\$ 54,440.00
000404	12/18/2020	\$ 19,521.10
000405	12/18/2020	\$ 3,086.00
000406	11/18/2020	\$ 284.40
000407	12/18/2020	\$ 22,768.00
000408	4/5/2019	\$ 1,400.00
000409	9/4/2020	\$ 5,070.00
000410	12/18/2020	\$ 3,286.36
000411	7/17/2020	\$ 5,238.00
000412	9/4/2020	\$ 13,889.41
000412	8/7/2020	\$ 11.00
000413	11/18/2020	\$ 166.00
000414	11/18/2020	\$ 4,004.00
000415	7/17/2020	\$ 5,309.80
000416	11/6/2020	\$ 8,089.99
000417	9/4/2020	\$ 12,178.00
000418	4/5/2019	\$ 1,069.40
000419	12/18/2020	\$ 3,091.86
000420	3/13/2020	\$ 2,581.99
000421	3/13/2020	\$ 2,650.00
000422	9/4/2020	\$ 209.04
000423	7/17/2020	\$ 5,130.18
000424	12/18/2020	\$ 3,102.97
000425	12/18/2020	\$ 26,000.00
000426	11/6/2020	\$ 5,170.00
000427	7/17/2020	\$ 2,310.06
000428	6/17/2020	\$ 259.98

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000429	11/6/2020	\$ 74,316.30
000430	11/18/2020	\$ 316.00
000431	9/4/2020	\$ 6,709.90
000432	12/18/2020	\$ 12,968.00
000433	9/4/2020	\$ 619.50
000434	3/13/2020	\$ 5,497.83
000435	3/13/2020	\$ 7,000.00
000436	9/4/2020	\$ 15,048.00
000437	12/18/2020	\$ 19,800.00
000438	3/13/2020	\$ 7,576.35
000439	7/17/2020	\$ 250.32
000440	12/18/2020	\$ 2,000.00
000441	3/13/2020	\$ 5,057.22
000442	9/4/2020	\$ 4,297.93
000443	12/18/2020	\$ 8,560.98
000444	12/18/2020	\$ 7,302.54
000445	4/5/2019	\$ 2,588.00
000446	7/17/2020	\$ 883.98
000447	7/17/2020	\$ 2,217.52
000448	9/4/2020	\$ 350.00
000449	3/13/2020	\$ 19,057.00
000450	3/13/2020	\$ 3,049.99
000451	3/13/2020	\$ 4,614.55
000452	12/18/2020	\$ 2,033.13
000453	3/13/2020	\$ 2,900.00
000454	6/19/2020	\$ 92.00
000455	10/16/2020	\$ 114.27
000456	3/13/2020	\$ 2,870.48
000457	12/18/2020	\$ 3,467.62
000458	12/18/2020	\$ 2,937.92
000459	1/29/2020	\$ 1,636.84
000460	12/18/2020	\$ 3,132.50
000461	3/13/2020	\$ 7,500.00
000462	12/18/2020	\$ 3,315.88
000463	4/5/2019	\$ 1,061.99
000464	6/19/2020	\$ 165.00
000465	7/17/2020	\$ 3,117.50
000466	3/20/2020	\$ 58,674.48
000467	3/13/2020	\$ 2,097.57
000468	12/18/2020	\$ 2,219.50
000469	3/13/2020	\$ 4,954.47
000470	11/6/2020	\$ 9,478.99
000471	4/24/2020	\$ 110.00

Attachment A

Schedule 1

Customer	Option Expiration Date	Restitution
000472	3/13/2020	\$ 108,597.28
000473	12/31/2020	\$ 13,650.00
000474	6/19/2020	\$ 2,171.00
000475	9/4/2020	\$ 603.99
000476	12/18/2020	\$ 15,474.51
000477	6/19/2020	\$ 276.00
000478	9/4/2020	\$ 672.50
000479	11/18/2020	\$ 90.00
000480	12/18/2020	\$ 6,730.00
000481	11/18/2020	\$ 99.00
000482	11/6/2020	\$ 6,324.98
000483	3/13/2020	\$ 1,099.00
000484	3/13/2020	\$ 400.00
000485	3/20/2020	\$ 376.99
000486	10/30/2020	\$ 707.00
000487	12/31/2020	\$ 3,597.33
000488	10/4/2019	\$ 100.00
000489	3/18/2020	\$ 147.99
000490	3/13/2020	\$ 2,626.00
000491	3/13/2020	\$ 121,000.00
000492	10/30/2020	\$ 320.00
000493	7/31/2020	\$ 97.00
000494	9/4/2020	\$ 1,063.46
000495	10/30/2020	\$ 41.74
000496	10/30/2020	\$ 191.00
000497	10/30/2020	\$ 42.80
000498	10/30/2020	\$ 2,065.00
000499	7/2/2020	\$ 11.78
000500	7/2/2020	\$ 43.78
Total Restitution		\$ 2,091,571.97

Attachment A**Schedule 2¹**

Customer	Erroneous Margin Notification Date	Restitution
000001	8/10/2018	\$ 67.40
000002	11/13/2020	\$ 139.82
000003	8/10/2018	\$ 166.00
000004	11/13/2020	\$ 64.53
000005	11/13/2020	\$ 86.04
000006	8/10/2018	\$ 139.50
000007	8/10/2018	\$ 52.96
000008	11/13/2020	\$ 108.33
000009	8/10/2018	\$ 462.00
000010	8/10/2018	\$ 601.65
000011	8/10/2018	\$ 100.75
000012	11/13/2020	\$ 105.17
000013	8/10/2018	\$ 219.75
000014	8/10/2018	\$ 127.80
000015	8/10/2018	\$ 252.47
000015	11/13/2020	\$ 2,483.46
000016	11/13/2020	\$ 74.99
000017	8/10/2018	\$ 121.75
000018	8/10/2018	\$ 112.14
000019	8/10/2018	\$ 76.41
000020	8/10/2018	\$ 53.20
000021	8/10/2018	\$ 434.00
000022	8/10/2018	\$ 269.50
000023	11/13/2020	\$ 134.15
000024	8/10/2018	\$ 60.34
000025	8/10/2018	\$ 619.00
000026	8/10/2018	\$ 132.43
000027	8/10/2018	\$ 50.40
000028	8/10/2018	\$ 1,590.79
000029	8/10/2018	\$ 72.90
000030	11/13/2020	\$ 1,000.00
000031	11/13/2020	\$ 141.10
000032	8/10/2018	\$ 236.00
000033	11/13/2020	\$ 484.11
000034	11/13/2020	\$ 181.25
000035	8/10/2018	\$ 330.30
000036	8/10/2018	\$ 55.93
000037	11/13/2020	\$ 82.31
000038	8/10/2018	\$ 101.00
000039	8/10/2018	\$ 394.72

¹ Schedule 2 identifies customers who suffered losses as a result of the firm's erroneous margin calls and margin call warnings.

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000040	8/10/2018	\$ 885.83
000041	11/13/2020	\$ 85.83
000042	8/10/2018	\$ 75.99
000043	8/10/2018	\$ 74.97
000044	8/10/2018	\$ 87.50
000045	11/13/2020	\$ 89.94
000046	11/13/2020	\$ 139.38
000047	8/10/2018	\$ 428.60
000048	11/13/2020	\$ 61.83
000049	8/10/2018	\$ 92.83
000050	11/13/2020	\$ 53.54
000051	11/13/2020	\$ 150.37
000052	11/13/2020	\$ 135.20
000053	8/10/2018	\$ 229.20
000054	8/10/2018	\$ 60.50
000055	11/13/2020	\$ 607.67
000056	8/10/2018	\$ 78.10
000057	11/13/2020	\$ 1,392.14
000058	8/10/2018	\$ 57.49
000058	11/13/2020	\$ 56.93
000059	11/13/2020	\$ 202.67
000060	8/10/2018	\$ 754.49
000061	8/10/2018	\$ 399.00
000062	8/10/2018	\$ 109.12
000063	11/13/2020	\$ 215.80
000064	11/13/2020	\$ 67.03
000065	8/10/2018	\$ 241.40
000066	8/10/2018	\$ 1,349.50
000067	8/10/2018	\$ 586.01
000068	8/10/2018	\$ 83.74
000069	8/10/2018	\$ 50.00
000070	8/10/2018	\$ 70.00
000071	8/10/2018	\$ 76.95
000072	11/13/2020	\$ 960.29
000073	8/10/2018	\$ 75.80
000074	8/10/2018	\$ 68.25
000075	8/10/2018	\$ 379.80
000076	11/13/2020	\$ 1,196.14
000077	11/13/2020	\$ 616.06
000078	11/13/2020	\$ 143.74

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
000079	8/10/2018	\$ 93.42
000080	8/10/2018	\$ 279.96
000081	8/10/2018	\$ 262.50
000082	11/13/2020	\$ 62.77
000083	8/10/2018	\$ 83.60
000084	8/10/2018	\$ 53.84
000085	8/10/2018	\$ 1,660.30
000086	11/13/2020	\$ 333.23
000087	8/10/2018	\$ 522.85
000088	8/10/2018	\$ 720.00
000089	8/10/2018	\$ 55.18
000090	8/10/2018	\$ 58.90
000091	8/10/2018	\$ 391.06
000092	11/13/2020	\$ 2,240.66
000093	8/10/2018	\$ 55.41
000094	11/13/2020	\$ 679.46
000095	8/10/2018	\$ 141.15
000096	8/10/2018	\$ 449.82
000097	11/13/2020	\$ 765.94
000098	8/10/2018	\$ 730.90
000099	11/13/2020	\$ 267.97
000100	8/10/2018	\$ 56.99
000101	11/13/2020	\$ 3,901.06
000102	11/13/2020	\$ 53.96
000103	8/10/2018	\$ 219.00
000104	8/10/2018	\$ 70.50
000105	11/13/2020	\$ 55.57
000106	8/10/2018	\$ 6,147.28
000107	8/10/2018	\$ 234.80
000108	8/10/2018	\$ 95.34
000109	8/10/2018	\$ 340.40
000110	8/10/2018	\$ 81.41
000110	11/13/2020	\$ 133.41
000111	8/10/2018	\$ 84.80
000112	8/10/2018	\$ 3,474.09
000113	8/10/2018	\$ 1,404.31
000114	8/10/2018	\$ 570.15
000115	11/13/2020	\$ 133.00
000116	11/13/2020	\$ 54.92
000117	11/13/2020	\$ 88.66

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000118	8/10/2018	\$ 152.50
000119	11/13/2020	\$ 228.55
000120	8/10/2018	\$ 103.11
000121	8/10/2018	\$ 150.05
000122	8/10/2018	\$ 202.49
000123	8/10/2018	\$ 64.68
000124	8/10/2018	\$ 1,406.17
000125	11/13/2020	\$ 71.06
000126	11/13/2020	\$ 128.97
000127	8/10/2018	\$ 65.09
000128	8/10/2018	\$ 346.40
000129	11/13/2020	\$ 464.35
000130	3/26/2019	\$ 479.27
000131	8/10/2018	\$ 130.00
000132	8/10/2018	\$ 69.04
000133	11/13/2020	\$ 155.49
000134	8/10/2018	\$ 652.79
000135	8/10/2018	\$ 282.16
000136	8/10/2018	\$ 3,064.75
000137	8/10/2018	\$ 59.90
000138	11/13/2020	\$ 96.43
000139	8/10/2018	\$ 311.02
000140	11/13/2020	\$ 163.99
000141	8/10/2018	\$ 66.95
000142	8/10/2018	\$ 452.75
000143	8/10/2018	\$ 56.00
000144	8/10/2018	\$ 52.00
000145	8/10/2018	\$ 190.52
000146	8/10/2018	\$ 78.90
000147	11/13/2020	\$ 151.22
000148	8/10/2018	\$ 598.05
000149	8/10/2018	\$ 59.50
000150	8/10/2018	\$ 86.30
000151	8/10/2018	\$ 1,563.06
000152	8/10/2018	\$ 71.16
000153	11/13/2020	\$ 485.48
000154	8/10/2018	\$ 123.18
000154	11/13/2020	\$ 1,250.27
000155	8/10/2018	\$ 175.50
000156	11/13/2020	\$ 168.99

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000157	8/10/2018	\$ 104.98
000158	8/10/2018	\$ 79.95
000159	11/13/2020	\$ 2,960.85
000160	8/10/2018	\$ 97.00
000161	11/13/2020	\$ 184.83
000162	8/10/2018	\$ 410.00
000163	11/13/2020	\$ 74.99
000164	11/13/2020	\$ 135.53
000165	8/10/2018	\$ 176.50
000166	11/13/2020	\$ 2,683.98
000167	11/13/2020	\$ 54.62
000168	8/10/2018	\$ 486.06
000169	8/10/2018	\$ 678.64
000170	3/26/2019	\$ 68.22
000171	8/10/2018	\$ 56.00
000172	8/10/2018	\$ 136.74
000173	11/13/2020	\$ 57.72
000174	11/13/2020	\$ 2,200.00
000175	11/13/2020	\$ 155.32
000176	8/10/2018	\$ 125.00
000177	3/26/2019	\$ 101.25
000178	8/10/2018	\$ 120.48
000179	11/13/2020	\$ 50.21
000180	8/10/2018	\$ 571.14
000181	8/10/2018	\$ 2,430.00
000182	8/10/2018	\$ 55.34
000183	8/10/2018	\$ 167.03
000184	8/10/2018	\$ 226.44
000185	11/13/2020	\$ 63.94
000186	11/13/2020	\$ 153.49
000187	8/10/2018	\$ 60.85
000188	11/13/2020	\$ 218.32
000189	11/13/2020	\$ 155.12
000190	8/10/2018	\$ 65.95
000191	11/13/2020	\$ 469.05
000192	11/13/2020	\$ 52.02
000193	8/10/2018	\$ 181.20
000194	8/10/2018	\$ 163.82
000195	8/10/2018	\$ 989.62
000196	8/10/2018	\$ 71.32

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000196	11/13/2020	\$ 218.07
000197	11/13/2020	\$ 226.88
000198	8/10/2018	\$ 110.65
000199	11/13/2020	\$ 1,636.28
000200	8/10/2018	\$ 70.00
000200	11/13/2020	\$ 282.53
000201	11/13/2020	\$ 2,832.87
000202	8/10/2018	\$ 133.70
000203	11/13/2020	\$ 57.00
000204	11/13/2020	\$ 119.37
000205	8/10/2018	\$ 386.97
000206	11/13/2020	\$ 59.03
000207	11/13/2020	\$ 57.87
000208	11/13/2020	\$ 66.62
000209	8/10/2018	\$ 70.11
000210	11/13/2020	\$ 248.96
000211	8/10/2018	\$ 67.40
000212	11/13/2020	\$ 70.33
000213	8/10/2018	\$ 206.50
000214	8/10/2018	\$ 269.85
000215	11/13/2020	\$ 122.70
000216	11/13/2020	\$ 166.30
000217	11/13/2020	\$ 51.06
000218	8/10/2018	\$ 102.50
000219	8/10/2018	\$ 310.50
000220	11/13/2020	\$ 418.89
000221	8/10/2018	\$ 350.00
000222	11/13/2020	\$ 109.04
000223	8/10/2018	\$ 271.89
000224	11/13/2020	\$ 80.96
000225	8/10/2018	\$ 604.54
000226	8/10/2018	\$ 50.00
000227	8/10/2018	\$ 54.50
000228	11/13/2020	\$ 629.38
000229	11/13/2020	\$ 442.53
000230	8/10/2018	\$ 56.10
000231	11/13/2020	\$ 142.83
000232	8/10/2018	\$ 79.00
000233	8/10/2018	\$ 161.67
000234	8/10/2018	\$ 99.06

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000235	8/10/2018	\$ 110.64
000236	11/13/2020	\$ 1,185.46
000237	11/13/2020	\$ 150.57
000238	11/13/2020	\$ 84.54
000239	11/13/2020	\$ 57.52
000240	8/10/2018	\$ 428.54
000241	8/10/2018	\$ 85.15
000242	11/13/2020	\$ 81.65
000243	11/13/2020	\$ 64.49
000244	8/10/2018	\$ 68.99
000245	8/10/2018	\$ 173.92
000246	8/10/2018	\$ 75.73
000247	8/10/2018	\$ 126.72
000248	8/10/2018	\$ 207.23
000249	8/10/2018	\$ 485.86
000250	11/13/2020	\$ 146.62
000251	11/13/2020	\$ 71.87
000252	8/10/2018	\$ 115.72
000253	8/10/2018	\$ 142.92
000254	8/10/2018	\$ 158.52
000255	11/13/2020	\$ 292.14
000256	11/13/2020	\$ 915.70
000257	8/10/2018	\$ 69.10
000258	8/10/2018	\$ 77.68
000259	8/10/2018	\$ 72.99
000259	11/13/2020	\$ 84.26
000260	8/10/2018	\$ 124.22
000261	11/13/2020	\$ 112.43
000262	11/13/2020	\$ 922.53
000263	8/10/2018	\$ 135.00
000264	11/13/2020	\$ 218.81
000265	8/10/2018	\$ 202.98
000266	8/10/2018	\$ 62.25
000267	8/10/2018	\$ 153.50
000268	11/13/2020	\$ 2,784.52
000269	11/13/2020	\$ 72.20
000270	11/13/2020	\$ 99.67
000271	11/13/2020	\$ 237.88
000272	11/13/2020	\$ 105.58
000273	8/10/2018	\$ 875.53

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000274	8/10/2018	\$ 143.15
000275	11/13/2020	\$ 69.24
000276	8/10/2018	\$ 413.07
000277	8/10/2018	\$ 1,776.70
000278	8/10/2018	\$ 240.00
000279	11/13/2020	\$ 341.37
000280	11/13/2020	\$ 700.30
000281	8/10/2018	\$ 421.50
000282	11/13/2020	\$ 112.36
000283	8/10/2018	\$ 58.51
000284	8/10/2018	\$ 100.50
000285	8/10/2018	\$ 483.69
000286	8/10/2018	\$ 78.01
000287	11/13/2020	\$ 308.81
000288	8/10/2018	\$ 88.20
000289	11/13/2020	\$ 439.00
000290	11/13/2020	\$ 136.10
000291	11/13/2020	\$ 254.49
000292	11/13/2020	\$ 6,029.49
000293	8/10/2018	\$ 67.06
000294	11/13/2020	\$ 89.92
000295	8/10/2018	\$ 305.61
000296	8/10/2018	\$ 170.82
000297	8/10/2018	\$ 213.75
000298	8/10/2018	\$ 169.29
000299	8/10/2018	\$ 72.78
000300	8/10/2018	\$ 126.73
000301	8/10/2018	\$ 200.18
000301	11/13/2020	\$ 317.46
000302	8/10/2018	\$ 194.60
000303	11/13/2020	\$ 116.26
000304	8/10/2018	\$ 3,702.12
000305	11/13/2020	\$ 96.81
000306	11/13/2020	\$ 102.58
000307	8/10/2018	\$ 111.00
000308	8/10/2018	\$ 62.30
000309	11/13/2020	\$ 170.87
000310	11/13/2020	\$ 342.25
000311	8/10/2018	\$ 72.49
000312	8/10/2018	\$ 510.86

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
000313	11/13/2020	\$ 682.09
000314	8/10/2018	\$ 599.58
000315	8/10/2018	\$ 9,546.40
000316	8/10/2018	\$ 411.71
000317	8/10/2018	\$ 138.80
000318	8/10/2018	\$ 235.52
000319	11/13/2020	\$ 823.61
000320	8/10/2018	\$ 96.00
000321	11/13/2020	\$ 93.69
000322	8/10/2018	\$ 273.22
000323	8/10/2018	\$ 78.92
000324	8/10/2018	\$ 572.48
000325	11/13/2020	\$ 61.00
000326	8/10/2018	\$ 213.18
000327	8/10/2018	\$ 1,077.78
000328	8/10/2018	\$ 253.66
000329	8/10/2018	\$ 133.99
000330	8/10/2018	\$ 208.38
000331	11/13/2020	\$ 61.57
000332	11/13/2020	\$ 179.99
000333	8/10/2018	\$ 94.70
000334	8/10/2018	\$ 54.00
000335	8/10/2018	\$ 77.25
000336	8/10/2018	\$ 53.30
000337	8/10/2018	\$ 477.77
000338	8/10/2018	\$ 77.00
000339	3/26/2019	\$ 911.70
000340	8/10/2018	\$ 72.00
000341	8/10/2018	\$ 61.25
000342	11/13/2020	\$ 151.04
000343	8/10/2018	\$ 97.00
000344	8/10/2018	\$ 260.25
000345	8/10/2018	\$ 248.80
000346	8/10/2018	\$ 93.23
000347	11/13/2020	\$ 282.80
000348	11/13/2020	\$ 96.00
000349	8/10/2018	\$ 82.10
000350	8/10/2018	\$ 248.82
000351	11/13/2020	\$ 94.76
000352	11/13/2020	\$ 3,204.48

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000353	8/10/2018	\$ 523.25
000353	11/13/2020	\$ 134.62
000354	8/10/2018	\$ 1,177.02
000355	11/13/2020	\$ 64.95
000356	8/10/2018	\$ 127.60
000357	8/10/2018	\$ 209.00
000358	11/13/2020	\$ 1,056.09
000359	11/13/2020	\$ 79.52
000360	11/13/2020	\$ 84.82
000361	11/13/2020	\$ 164.88
000362	8/10/2018	\$ 66.99
000363	8/10/2018	\$ 108.97
000364	8/10/2018	\$ 1,253.76
000365	8/10/2018	\$ 68.62
000366	8/10/2018	\$ 129.50
000367	8/10/2018	\$ 432.40
000368	11/13/2020	\$ 73.80
000369	11/13/2020	\$ 62.77
000370	8/10/2018	\$ 68.00
000371	8/10/2018	\$ 58.38
000372	11/13/2020	\$ 1,059.15
000373	8/10/2018	\$ 147.38
000374	11/13/2020	\$ 389.95
000375	8/10/2018	\$ 159.70
000376	8/10/2018	\$ 103.10
000377	11/13/2020	\$ 1,831.05
000378	8/10/2018	\$ 112.62
000379	8/10/2018	\$ 154.78
000380	8/10/2018	\$ 1,845.00
000381	11/13/2020	\$ 1,077.09
000382	11/13/2020	\$ 81.15
000383	8/10/2018	\$ 77.79
000384	11/13/2020	\$ 85.62
000385	8/10/2018	\$ 55.68
000386	11/13/2020	\$ 1,151.73
000387	8/10/2018	\$ 327.42
000388	11/13/2020	\$ 274.14
000389	8/10/2018	\$ 3,780.84
000390	3/26/2019	\$ 67.67
000391	8/10/2018	\$ 683.88

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
000392	11/13/2020	\$ 194.91
000393	8/10/2018	\$ 426.22
000394	8/10/2018	\$ 3,875.00
000395	8/10/2018	\$ 65.70
000396	8/10/2018	\$ 292.09
000397	8/10/2018	\$ 141.37
000398	8/10/2018	\$ 321.36
000399	8/10/2018	\$ 242.71
000400	8/10/2018	\$ 365.70
000401	8/10/2018	\$ 5,675.00
000402	11/13/2020	\$ 171.27
000403	8/10/2018	\$ 255.36
000404	11/13/2020	\$ 111.21
000405	11/13/2020	\$ 56.68
000406	8/10/2018	\$ 94.86
000407	11/13/2020	\$ 54.53
000408	8/10/2018	\$ 492.92
000409	11/13/2020	\$ 283.49
000410	8/10/2018	\$ 68.09
000411	8/10/2018	\$ 60.00
000412	8/10/2018	\$ 66.00
000413	8/10/2018	\$ 1,620.00
000414	11/13/2020	\$ 107.20
000415	11/13/2020	\$ 1,307.66
000416	11/13/2020	\$ 789.40
000417	8/10/2018	\$ 66.65
000418	8/10/2018	\$ 227.33
000419	8/10/2018	\$ 118.30
000420	8/10/2018	\$ 452.40
000421	8/10/2018	\$ 252.53
000421	3/26/2019	\$ 701.96
000422	8/10/2018	\$ 65.12
000423	8/10/2018	\$ 90.70
000424	8/10/2018	\$ 59.07
000425	8/10/2018	\$ 92.37
000426	8/10/2018	\$ 1,300.74
000427	3/26/2019	\$ 80.95
000428	11/13/2020	\$ 136.65
000429	8/10/2018	\$ 971.33
000430	8/10/2018	\$ 231.76

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000431	8/10/2018	\$ 6,233.89
000432	8/10/2018	\$ 98.55
000433	8/10/2018	\$ 593.13
000434	8/10/2018	\$ 220.50
000435	8/10/2018	\$ 54.12
000436	8/10/2018	\$ 121.74
000437	8/10/2018	\$ 188.55
000438	8/10/2018	\$ 162.39
000439	11/13/2020	\$ 146.08
000440	11/13/2020	\$ 389.40
000441	8/10/2018	\$ 70.16
000442	8/10/2018	\$ 137.15
000443	11/13/2020	\$ 68.99
000444	8/10/2018	\$ 251.15
000445	11/13/2020	\$ 71.45
000446	8/10/2018	\$ 53.29
000447	11/13/2020	\$ 585.59
000448	11/13/2020	\$ 141.19
000449	8/10/2018	\$ 1,019.79
000450	11/13/2020	\$ 70.10
000451	8/10/2018	\$ 82.10
000452	11/13/2020	\$ 543.60
000453	8/10/2018	\$ 246.73
000454	8/10/2018	\$ 1,357.29
000455	11/13/2020	\$ 175.67
000456	8/10/2018	\$ 97.49
000457	8/10/2018	\$ 89.92
000457	11/13/2020	\$ 59.88
000458	8/10/2018	\$ 85.95
000459	8/10/2018	\$ 606.00
000460	8/10/2018	\$ 309.50
000461	8/10/2018	\$ 84.40
000462	11/13/2020	\$ 444.56
000463	8/10/2018	\$ 287.54
000464	11/13/2020	\$ 263.17
000465	11/13/2020	\$ 96.10
000466	8/10/2018	\$ 106.47
000467	11/13/2020	\$ 2,159.77
000468	8/10/2018	\$ 118.30
000469	3/26/2019	\$ 428.40

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
000470	8/10/2018	\$ 52.00
000471	8/10/2018	\$ 77.22
000472	11/13/2020	\$ 359.10
000473	8/10/2018	\$ 51.80
000474	11/13/2020	\$ 99.27
000475	8/10/2018	\$ 54.60
000476	8/10/2018	\$ 58.40
000477	3/26/2019	\$ 289.68
000478	8/10/2018	\$ 386.70
000479	8/10/2018	\$ 79.25
000480	8/10/2018	\$ 190.84
000481	3/26/2019	\$ 62.96
000482	11/13/2020	\$ 1,035.34
000483	11/13/2020	\$ 89.60
000484	8/10/2018	\$ 62.99
000485	8/10/2018	\$ 54.85
000485	11/13/2020	\$ 54.37
000486	8/10/2018	\$ 78.30
000487	11/13/2020	\$ 233.86
000488	8/10/2018	\$ 386.42
000489	11/13/2020	\$ 295.50
000490	8/10/2018	\$ 1,766.14
000491	8/10/2018	\$ 56.40
000492	8/10/2018	\$ 126.70
000493	11/13/2020	\$ 1,030.31
000494	8/10/2018	\$ 106.58
000495	11/13/2020	\$ 52.76
000496	11/13/2020	\$ 59.93
000497	8/10/2018	\$ 59.61
000498	8/10/2018	\$ 61.75
000499	8/10/2018	\$ 296.40
000500	8/10/2018	\$ 23,529.30
000501	8/10/2018	\$ 365.94
000502	8/10/2018	\$ 720.98
000503	8/10/2018	\$ 129.99
000504	11/13/2020	\$ 226.10
000505	8/10/2018	\$ 78.67
000506	11/13/2020	\$ 114.49
000507	11/13/2020	\$ 505.50
000508	8/10/2018	\$ 100.13

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000509	8/10/2018	\$ 354.00
000510	11/13/2020	\$ 197.01
000511	11/13/2020	\$ 1,648.13
000512	8/10/2018	\$ 343.35
000513	8/10/2018	\$ 58.72
000514	8/10/2018	\$ 371.72
000515	11/13/2020	\$ 113.99
000516	8/10/2018	\$ 5,422.42
000517	8/10/2018	\$ 79.00
000518	11/13/2020	\$ 1,170.43
000519	8/10/2018	\$ 261.14
000520	8/10/2018	\$ 64.10
000521	11/13/2020	\$ 575.52
000522	8/10/2018	\$ 392.94
000523	8/10/2018	\$ 121.63
000524	8/10/2018	\$ 65.78
000525	11/13/2020	\$ 255.78
000526	8/10/2018	\$ 8,529.73
000527	8/10/2018	\$ 74.05
000528	8/10/2018	\$ 157.74
000529	11/13/2020	\$ 978.39
000530	11/13/2020	\$ 418.91
000531	8/10/2018	\$ 238.48
000532	8/10/2018	\$ 59.50
000533	8/10/2018	\$ 73.72
000534	8/10/2018	\$ 51.90
000535	8/10/2018	\$ 69.98
000535	11/13/2020	\$ 53.84
000536	11/13/2020	\$ 209.96
000537	11/13/2020	\$ 366.15
000538	8/10/2018	\$ 112.60
000539	8/10/2018	\$ 213.18
000540	8/10/2018	\$ 450.00
000541	8/10/2018	\$ 65.03
000542	8/10/2018	\$ 215.00
000543	8/10/2018	\$ 101.50
000544	8/10/2018	\$ 169.36
000545	8/10/2018	\$ 144.77
000546	8/10/2018	\$ 72.80
000547	8/10/2018	\$ 90.84

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000548	8/10/2018	\$ 58.81
000549	11/13/2020	\$ 179.35
000550	8/10/2018	\$ 76.50
000551	11/13/2020	\$ 86.88
000552	8/10/2018	\$ 79.10
000553	8/10/2018	\$ 81.30
000554	8/10/2018	\$ 102.44
000555	8/10/2018	\$ 733.50
000556	8/10/2018	\$ 259.86
000557	11/13/2020	\$ 62.19
000558	11/13/2020	\$ 161.76
000559	8/10/2018	\$ 214.50
000560	8/10/2018	\$ 300.06
000561	11/13/2020	\$ 62.87
000562	8/10/2018	\$ 375.08
000563	8/10/2018	\$ 84.53
000564	8/10/2018	\$ 1,216.02
000565	8/10/2018	\$ 56.09
000566	8/10/2018	\$ 78.22
000567	8/10/2018	\$ 221.36
000568	11/13/2020	\$ 185.87
000569	8/10/2018	\$ 136.85
000570	8/10/2018	\$ 193.75
000571	8/10/2018	\$ 73.30
000572	11/13/2020	\$ 341.33
000573	11/13/2020	\$ 249.69
000574	8/10/2018	\$ 76.20
000575	8/10/2018	\$ 285.92
000576	8/10/2018	\$ 340.89
000577	8/10/2018	\$ 188.89
000578	11/13/2020	\$ 75.55
000579	8/10/2018	\$ 99.08
000580	8/10/2018	\$ 78.62
000581	11/13/2020	\$ 3,699.10
000582	8/10/2018	\$ 289.50
000583	8/10/2018	\$ 138.78
000584	8/10/2018	\$ 171.69
000585	8/10/2018	\$ 67.58
000586	11/13/2020	\$ 51.80
000587	8/10/2018	\$ 172.80

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000588	8/10/2018	\$ 195.87
000589	8/10/2018	\$ 9,543.55
000590	8/10/2018	\$ 85.55
000591	11/13/2020	\$ 107.00
000592	8/10/2018	\$ 70.05
000593	11/13/2020	\$ 79.23
000594	8/10/2018	\$ 257.56
000595	8/10/2018	\$ 88.52
000596	8/10/2018	\$ 52.07
000597	8/10/2018	\$ 160.36
000598	8/10/2018	\$ 1,077.74
000599	11/13/2020	\$ 701.39
000600	8/10/2018	\$ 115.98
000601	11/13/2020	\$ 258.40
000602	11/13/2020	\$ 103.51
000603	8/10/2018	\$ 678.48
000604	11/13/2020	\$ 688.53
000605	11/13/2020	\$ 470.43
000606	8/10/2018	\$ 206.20
000607	8/10/2018	\$ 57.56
000608	8/10/2018	\$ 107.70
000609	8/10/2018	\$ 152.84
000610	8/10/2018	\$ 83.97
000611	8/10/2018	\$ 715.37
000612	11/13/2020	\$ 77.64
000613	8/10/2018	\$ 92.00
000614	8/10/2018	\$ 98.59
000615	8/10/2018	\$ 124.90
000616	8/10/2018	\$ 144.00
000617	8/10/2018	\$ 57.25
000618	8/10/2018	\$ 406.00
000619	8/10/2018	\$ 657.78
000620	8/10/2018	\$ 534.19
000621	8/10/2018	\$ 112.19
000622	8/10/2018	\$ 89.24
000623	8/10/2018	\$ 72.57
000624	8/10/2018	\$ 99.70
000625	8/10/2018	\$ 104.65
000626	8/10/2018	\$ 971.24
000627	8/10/2018	\$ 74.58

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000628	11/13/2020	\$ 189.06
000629	8/10/2018	\$ 307.02
000630	11/13/2020	\$ 507.34
000631	11/13/2020	\$ 149.92
000632	8/10/2018	\$ 55.12
000633	8/10/2018	\$ 153.99
000634	3/26/2019	\$ 284.46
000635	8/10/2018	\$ 62.57
000636	11/13/2020	\$ 56.49
000637	8/10/2018	\$ 153.45
000638	11/13/2020	\$ 177.33
000639	8/10/2018	\$ 212.00
000640	11/13/2020	\$ 243.80
000641	8/10/2018	\$ 105.10
000642	11/13/2020	\$ 144.67
000643	8/10/2018	\$ 97.09
000644	8/10/2018	\$ 700.00
000645	11/13/2020	\$ 178.86
000646	8/10/2018	\$ 96.15
000647	8/10/2018	\$ 82.40
000648	8/10/2018	\$ 127.90
000649	11/13/2020	\$ 53.51
000650	8/10/2018	\$ 426.65
000651	11/13/2020	\$ 130.12
000652	11/13/2020	\$ 161.41
000653	8/10/2018	\$ 50.00
000654	11/13/2020	\$ 72.01
000655	8/10/2018	\$ 65.57
000656	11/13/2020	\$ 145.28
000657	8/10/2018	\$ 286.16
000658	8/10/2018	\$ 157.64
000659	8/10/2018	\$ 111.96
000660	8/10/2018	\$ 135.29
000661	11/13/2020	\$ 52.37
000662	3/26/2019	\$ 96.86
000663	8/10/2018	\$ 336.00
000664	8/10/2018	\$ 841.00
000665	8/10/2018	\$ 52.54
000666	11/13/2020	\$ 189.64
000667	8/10/2018	\$ 239.26

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000668	8/10/2018	\$ 163.20
000669	8/10/2018	\$ 300.75
000670	11/13/2020	\$ 229.20
000671	8/10/2018	\$ 211.14
000672	8/10/2018	\$ 57.73
000673	8/10/2018	\$ 108.00
000674	8/10/2018	\$ 83.00
000675	8/10/2018	\$ 640.64
000676	8/10/2018	\$ 217.79
000677	8/10/2018	\$ 50.59
000678	8/10/2018	\$ 333.64
000679	8/10/2018	\$ 81.57
000680	8/10/2018	\$ 77.80
000681	8/10/2018	\$ 1,026.50
000682	11/13/2020	\$ 741.16
000683	11/13/2020	\$ 54.33
000684	8/10/2018	\$ 50.39
000685	8/10/2018	\$ 94.78
000686	8/10/2018	\$ 514.80
000687	11/13/2020	\$ 592.69
000688	8/10/2018	\$ 53.00
000689	8/10/2018	\$ 618.00
000690	8/10/2018	\$ 143.98
000691	11/13/2020	\$ 866.93
000692	8/10/2018	\$ 748.65
000693	11/13/2020	\$ 92.21
000694	8/10/2018	\$ 78.08
000695	11/13/2020	\$ 82.67
000696	8/10/2018	\$ 211.17
000697	11/13/2020	\$ 421.94
000698	8/10/2018	\$ 386.58
000699	8/10/2018	\$ 63.35
000700	8/10/2018	\$ 489.10
000701	8/10/2018	\$ 177.12
000702	8/10/2018	\$ 73.69
000703	11/13/2020	\$ 1,332.74
000704	8/10/2018	\$ 1,299.00
000705	8/10/2018	\$ 117.25
000706	8/10/2018	\$ 116.95
000707	8/10/2018	\$ 1,394.15

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000708	8/10/2018	\$ 108.37
000709	8/10/2018	\$ 119.64
000710	8/10/2018	\$ 86.50
000711	8/10/2018	\$ 198.06
000712	8/10/2018	\$ 316.36
000713	8/10/2018	\$ 50.58
000714	8/10/2018	\$ 163.40
000715	11/13/2020	\$ 401.67
000716	8/10/2018	\$ 130.15
000717	8/10/2018	\$ 63.25
000718	11/13/2020	\$ 1,849.27
000719	8/10/2018	\$ 74.37
000720	11/13/2020	\$ 266.74
000721	8/10/2018	\$ 209.16
000722	8/10/2018	\$ 148.16
000723	8/10/2018	\$ 56.62
000724	8/10/2018	\$ 193.80
000725	8/10/2018	\$ 1,197.74
000726	11/13/2020	\$ 92.39
000727	8/10/2018	\$ 735.87
000728	8/10/2018	\$ 70.15
000729	8/10/2018	\$ 217.77
000730	11/13/2020	\$ 4,848.43
000731	8/10/2018	\$ 255.54
000732	11/13/2020	\$ 156.81
000733	11/13/2020	\$ 76.54
000734	8/10/2018	\$ 190.00
000735	8/10/2018	\$ 208.00
000736	8/10/2018	\$ 349.18
000737	11/13/2020	\$ 84.06
000738	11/13/2020	\$ 172.20
000739	8/10/2018	\$ 361.18
000740	8/10/2018	\$ 111.18
000740	11/13/2020	\$ 137.39
000741	8/10/2018	\$ 238.07
000742	8/10/2018	\$ 296.90
000743	8/10/2018	\$ 189.22
000744	8/10/2018	\$ 64.87
000745	3/26/2019	\$ 140.24
000746	8/10/2018	\$ 177.51

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000747	8/10/2018	\$ 116.88
000748	8/10/2018	\$ 819.95
000749	11/13/2020	\$ 62.34
000750	11/13/2020	\$ 64.72
000751	8/10/2018	\$ 190.77
000752	11/13/2020	\$ 773.90
000753	8/10/2018	\$ 139.50
000754	8/10/2018	\$ 90.00
000755	8/10/2018	\$ 148.20
000756	11/13/2020	\$ 388.81
000757	8/10/2018	\$ 255.20
000758	11/13/2020	\$ 757.66
000759	8/10/2018	\$ 150.53
000760	11/13/2020	\$ 466.07
000761	8/10/2018	\$ 94.82
000762	8/10/2018	\$ 183.26
000763	8/10/2018	\$ 127.99
000764	8/10/2018	\$ 304.53
000765	11/13/2020	\$ 572.16
000766	8/10/2018	\$ 187.20
000767	11/13/2020	\$ 137.50
000768	8/10/2018	\$ 199.60
000769	8/10/2018	\$ 128.30
000770	8/10/2018	\$ 69.90
000771	11/13/2020	\$ 1,451.09
000772	8/10/2018	\$ 69.70
000773	8/10/2018	\$ 53.45
000774	11/13/2020	\$ 266.63
000775	8/10/2018	\$ 1,620.00
000776	11/13/2020	\$ 69.69
000777	8/10/2018	\$ 61.80
000778	11/13/2020	\$ 148.83
000779	11/13/2020	\$ 281.43
000780	11/13/2020	\$ 76.43
000781	11/13/2020	\$ 69.91
000782	11/13/2020	\$ 80.88
000783	8/10/2018	\$ 1,116.23
000784	8/10/2018	\$ 398.47
000785	8/10/2018	\$ 429.13
000786	11/13/2020	\$ 467.84

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000787	8/10/2018	\$ 18,305.71
000788	8/10/2018	\$ 103.50
000789	8/10/2018	\$ 55.00
000790	8/10/2018	\$ 98.69
000791	8/10/2018	\$ 479.68
000792	8/10/2018	\$ 55.50
000793	8/10/2018	\$ 403.12
000794	11/13/2020	\$ 131.09
000795	11/13/2020	\$ 195.71
000796	8/10/2018	\$ 59.10
000797	8/10/2018	\$ 53.93
000798	8/10/2018	\$ 84.15
000799	8/10/2018	\$ 50.69
000800	11/13/2020	\$ 2,117.85
000801	8/10/2018	\$ 398.40
000802	8/10/2018	\$ 106.70
000803	8/10/2018	\$ 346.98
000804	8/10/2018	\$ 2,426.94
000805	8/10/2018	\$ 90.82
000806	11/13/2020	\$ 478.40
000807	8/10/2018	\$ 80.88
000808	11/13/2020	\$ 84.13
000809	11/13/2020	\$ 190.56
000810	8/10/2018	\$ 2,884.26
000811	8/10/2018	\$ 1,983.60
000812	8/10/2018	\$ 115.98
000813	8/10/2018	\$ 146.25
000814	8/10/2018	\$ 624.76
000815	8/10/2018	\$ 436.46
000815	11/13/2020	\$ 609.07
000816	8/10/2018	\$ 546.19
000817	8/10/2018	\$ 50.91
000818	11/13/2020	\$ 80.85
000819	8/10/2018	\$ 53.86
000820	8/10/2018	\$ 74.70
000821	8/10/2018	\$ 92.01
000822	8/10/2018	\$ 105.00
000823	11/13/2020	\$ 56.29
000824	11/13/2020	\$ 86.99
000825	11/13/2020	\$ 51.00

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000826	8/10/2018	\$ 150.05
000827	8/10/2018	\$ 65.75
000828	11/13/2020	\$ 180.30
000829	11/13/2020	\$ 173.13
000830	8/10/2018	\$ 170.10
000831	11/13/2020	\$ 111.06
000832	8/10/2018	\$ 56.36
000833	8/10/2018	\$ 541.19
000834	8/10/2018	\$ 70.95
000835	8/10/2018	\$ 87.48
000836	11/13/2020	\$ 273.15
000837	8/10/2018	\$ 54.16
000838	11/13/2020	\$ 50.05
000839	11/13/2020	\$ 53.49
000840	8/10/2018	\$ 562.39
000841	8/10/2018	\$ 92.50
000842	11/13/2020	\$ 3,764.75
000843	8/10/2018	\$ 77.43
000844	8/10/2018	\$ 54.03
000845	11/13/2020	\$ 119.99
000846	8/10/2018	\$ 180.78
000847	8/10/2018	\$ 1,459.90
000848	3/26/2019	\$ 162.61
000849	8/10/2018	\$ 930.69
000850	8/10/2018	\$ 172.73
000851	8/10/2018	\$ 60.89
000852	8/10/2018	\$ 129.00
000853	8/10/2018	\$ 273.48
000854	8/10/2018	\$ 66.28
000855	11/13/2020	\$ 57.84
000856	11/13/2020	\$ 64.17
000857	8/10/2018	\$ 237.91
000858	3/26/2019	\$ 189.84
000859	11/13/2020	\$ 67.55
000860	11/13/2020	\$ 958.00
000861	11/13/2020	\$ 51.04
000862	8/10/2018	\$ 88.49
000863	8/10/2018	\$ 435.45
000864	11/13/2020	\$ 212.62
000865	11/13/2020	\$ 54.21

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000866	11/13/2020	\$ 118.00
000867	8/10/2018	\$ 180.57
000868	8/10/2018	\$ 94.19
000869	8/10/2018	\$ 259.04
000870	8/10/2018	\$ 549.70
000870	11/13/2020	\$ 68.13
000871	11/13/2020	\$ 847.30
000872	11/13/2020	\$ 122.86
000873	8/10/2018	\$ 89.08
000874	11/13/2020	\$ 116.43
000875	11/13/2020	\$ 75.40
000876	8/10/2018	\$ 308.35
000877	8/10/2018	\$ 55.50
000878	11/13/2020	\$ 177.59
000879	8/10/2018	\$ 276.99
000880	8/10/2018	\$ 125.31
000881	8/10/2018	\$ 97.27
000882	8/10/2018	\$ 74.25
000883	11/13/2020	\$ 643.65
000884	8/10/2018	\$ 194.75
000885	11/13/2020	\$ 148.96
000886	8/10/2018	\$ 1,515.97
000887	8/10/2018	\$ 65.00
000888	8/10/2018	\$ 301.40
000889	8/10/2018	\$ 225.20
000890	11/13/2020	\$ 131.09
000891	8/10/2018	\$ 487.88
000892	11/13/2020	\$ 106.79
000893	8/10/2018	\$ 240.30
000894	8/10/2018	\$ 1,174.72
000895	11/13/2020	\$ 550.61
000896	8/10/2018	\$ 760.97
000897	8/10/2018	\$ 214.31
000898	8/10/2018	\$ 54.65
000899	8/10/2018	\$ 124.03
000900	11/13/2020	\$ 71.14
000901	8/10/2018	\$ 360.50
000902	8/10/2018	\$ 170.37
000903	11/13/2020	\$ 197.97
000904	11/13/2020	\$ 116.42

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
000905	8/10/2018	\$ 51.06
000906	8/10/2018	\$ 270.00
000907	8/10/2018	\$ 61.67
000908	8/10/2018	\$ 469.85
000909	8/10/2018	\$ 80.00
000910	8/10/2018	\$ 85.91
000911	8/10/2018	\$ 66.08
000912	8/10/2018	\$ 123.24
000913	8/10/2018	\$ 143.60
000914	11/13/2020	\$ 56.42
000915	11/13/2020	\$ 581.94
000916	8/10/2018	\$ 386.35
000917	8/10/2018	\$ 88.66
000918	11/13/2020	\$ 100.80
000919	11/13/2020	\$ 92.71
000920	8/10/2018	\$ 610.54
000921	11/13/2020	\$ 398.33
000922	8/10/2018	\$ 121.38
000923	11/13/2020	\$ 688.18
000924	11/13/2020	\$ 987.20
000925	8/10/2018	\$ 3,136.08
000926	11/13/2020	\$ 125.10
000927	8/10/2018	\$ 664.53
000928	11/13/2020	\$ 54.59
000929	8/10/2018	\$ 58.00
000930	11/13/2020	\$ 82.66
000931	8/10/2018	\$ 122.52
000932	8/10/2018	\$ 118.20
000933	11/13/2020	\$ 55.97
000934	8/10/2018	\$ 84.00
000935	11/13/2020	\$ 145.78
000936	8/10/2018	\$ 66.00
000937	8/10/2018	\$ 53.67
000938	11/13/2020	\$ 118.73
000939	11/13/2020	\$ 123.65
000940	11/13/2020	\$ 1,142.02
000941	11/13/2020	\$ 53.46
000942	8/10/2018	\$ 99.12
000943	11/13/2020	\$ 213.14
000944	8/10/2018	\$ 123.00

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
000945	11/13/2020	\$ 105.10
000946	8/10/2018	\$ 129.92
000947	11/13/2020	\$ 1,106.31
000948	11/13/2020	\$ 115.13
000949	3/26/2019	\$ 233.66
000950	8/10/2018	\$ 2,670.00
000951	8/10/2018	\$ 127.20
000952	8/10/2018	\$ 157.00
000953	8/10/2018	\$ 116.28
000954	11/13/2020	\$ 198.59
000955	11/13/2020	\$ 86.94
000956	8/10/2018	\$ 67.84
000957	11/13/2020	\$ 69.80
000958	8/10/2018	\$ 604.84
000959	11/13/2020	\$ 411.88
000960	11/13/2020	\$ 108.59
000961	11/13/2020	\$ 57.20
000962	8/10/2018	\$ 161.98
000963	11/13/2020	\$ 71.32
000964	8/10/2018	\$ 64.26
000965	8/10/2018	\$ 163.99
000965	11/13/2020	\$ 190.92
000966	8/10/2018	\$ 819.00
000967	8/10/2018	\$ 669.60
000968	11/13/2020	\$ 140.67
000969	8/10/2018	\$ 74.61
000970	8/10/2018	\$ 126.50
000971	8/10/2018	\$ 377.00
000972	11/13/2020	\$ 3,141.08
000973	8/10/2018	\$ 64.00
000974	8/10/2018	\$ 89.37
000975	11/13/2020	\$ 189.71
000976	3/26/2019	\$ 135.43
000977	11/13/2020	\$ 123.82
000978	11/13/2020	\$ 817.21
000979	8/10/2018	\$ 83.30
000980	8/10/2018	\$ 85.26
000981	8/10/2018	\$ 59.66
000982	11/13/2020	\$ 58.81
000983	11/13/2020	\$ 4,017.24

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
000984	11/13/2020	\$ 77.11
000985	8/10/2018	\$ 60.04
000986	8/10/2018	\$ 57.33
000987	11/13/2020	\$ 86.52
000988	3/26/2019	\$ 94.97
000989	8/10/2018	\$ 474.50
000990	8/10/2018	\$ 61.05
000991	8/10/2018	\$ 268.95
000992	11/13/2020	\$ 175.20
000993	11/13/2020	\$ 62.92
000994	8/10/2018	\$ 64.32
000995	8/10/2018	\$ 129.36
000996	11/13/2020	\$ 84.57
000997	8/10/2018	\$ 53.80
000998	8/10/2018	\$ 147.57
000999	8/10/2018	\$ 58.29
001000	8/10/2018	\$ 82.39
001001	8/10/2018	\$ 60.19
001002	11/13/2020	\$ 157.31
001003	8/10/2018	\$ 91.12
001004	8/10/2018	\$ 365.05
001005	8/10/2018	\$ 218.99
001006	8/10/2018	\$ 50.54
001007	8/10/2018	\$ 932.08
001008	8/10/2018	\$ 57.70
001009	8/10/2018	\$ 93.69
001010	11/13/2020	\$ 136.80
001011	8/10/2018	\$ 63.70
001012	11/13/2020	\$ 336.68
001013	3/26/2019	\$ 94.59
001014	11/13/2020	\$ 582.47
001015	8/10/2018	\$ 283.40
001016	8/10/2018	\$ 336.95
001016	11/13/2020	\$ 187.05
001017	8/10/2018	\$ 214.35
001018	8/10/2018	\$ 598.52
001019	11/13/2020	\$ 569.75
001020	8/10/2018	\$ 62.49
001021	8/10/2018	\$ 415.43
001022	8/10/2018	\$ 79.38

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001023	8/10/2018	\$ 56.76
001024	8/10/2018	\$ 56.68
001025	8/10/2018	\$ 55.02
001026	8/10/2018	\$ 140.76
001027	8/10/2018	\$ 150.66
001028	8/10/2018	\$ 662.30
001029	11/13/2020	\$ 73.70
001030	11/13/2020	\$ 492.33
001031	8/10/2018	\$ 6,653.51
001032	11/13/2020	\$ 54.81
001033	8/10/2018	\$ 279.27
001033	11/13/2020	\$ 909.02
001034	11/13/2020	\$ 100.38
001035	8/10/2018	\$ 108.00
001036	8/10/2018	\$ 147.40
001037	11/13/2020	\$ 110.66
001038	11/13/2020	\$ 59.94
001039	8/10/2018	\$ 139.00
001040	8/10/2018	\$ 50.31
001041	8/10/2018	\$ 73.35
001042	8/10/2018	\$ 1,542.03
001043	11/13/2020	\$ 73.46
001044	8/10/2018	\$ 61.80
001045	11/13/2020	\$ 61.71
001046	11/13/2020	\$ 151.32
001047	8/10/2018	\$ 722.63
001048	8/10/2018	\$ 154.50
001049	8/10/2018	\$ 63.54
001050	8/10/2018	\$ 60.00
001051	8/10/2018	\$ 125.16
001052	8/10/2018	\$ 50.69
001053	11/13/2020	\$ 156.52
001054	8/10/2018	\$ 129.95
001055	8/10/2018	\$ 59.90
001056	3/26/2019	\$ 829.41
001057	11/13/2020	\$ 203.42
001058	11/13/2020	\$ 297.75
001059	8/10/2018	\$ 80.29
001060	11/13/2020	\$ 495.01
001061	8/10/2018	\$ 452.79

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001062	8/10/2018	\$ 156.52
001063	8/10/2018	\$ 78.96
001064	8/10/2018	\$ 60.79
001065	11/13/2020	\$ 109.09
001066	8/10/2018	\$ 462.40
001067	8/10/2018	\$ 347.88
001068	8/10/2018	\$ 54.90
001069	8/10/2018	\$ 84.10
001070	8/10/2018	\$ 74.22
001071	8/10/2018	\$ 99.64
001072	11/13/2020	\$ 196.16
001073	8/10/2018	\$ 84.00
001074	8/10/2018	\$ 70.50
001075	11/13/2020	\$ 159.92
001076	11/13/2020	\$ 294.58
001077	8/10/2018	\$ 86.92
001078	8/10/2018	\$ 188.28
001079	11/13/2020	\$ 94.67
001080	3/26/2019	\$ 225.97
001081	8/10/2018	\$ 126.90
001082	8/10/2018	\$ 550.91
001083	8/10/2018	\$ 167.99
001084	8/10/2018	\$ 109.50
001085	8/10/2018	\$ 79.52
001086	8/10/2018	\$ 351.60
001087	8/10/2018	\$ 5,819.90
001088	8/10/2018	\$ 72.64
001089	8/10/2018	\$ 96.18
001090	11/13/2020	\$ 115.55
001091	8/10/2018	\$ 68.26
001092	8/10/2018	\$ 164.25
001093	8/10/2018	\$ 55.82
001094	11/13/2020	\$ 61.61
001095	8/10/2018	\$ 88.66
001096	8/10/2018	\$ 51.16
001097	11/13/2020	\$ 75.65
001098	8/10/2018	\$ 257.55
001099	8/10/2018	\$ 330.40
001099	11/13/2020	\$ 58.04
001100	8/10/2018	\$ 349.16

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001101	3/26/2019	\$ 286.77
001102	11/13/2020	\$ 341.88
001103	11/13/2020	\$ 1,175.21
001104	8/10/2018	\$ 50.24
001105	8/10/2018	\$ 121.73
001106	8/10/2018	\$ 114.38
001107	11/13/2020	\$ 288.07
001108	8/10/2018	\$ 127.50
001109	8/10/2018	\$ 92.70
001110	8/10/2018	\$ 97.30
001111	8/10/2018	\$ 76.00
001112	8/10/2018	\$ 182.73
001113	8/10/2018	\$ 70.78
001114	8/10/2018	\$ 327.85
001115	11/13/2020	\$ 90.92
001116	8/10/2018	\$ 67.91
001117	8/10/2018	\$ 135.61
001118	11/13/2020	\$ 748.04
001119	11/13/2020	\$ 334.37
001120	11/13/2020	\$ 80.47
001121	11/13/2020	\$ 11,558.73
001122	8/10/2018	\$ 50.99
001123	11/13/2020	\$ 5,352.77
001124	8/10/2018	\$ 799.95
001125	8/10/2018	\$ 1,028.81
001126	11/13/2020	\$ 139.15
001127	11/13/2020	\$ 237.10
001128	11/13/2020	\$ 471.19
001129	8/10/2018	\$ 89.10
001130	11/13/2020	\$ 655.16
001131	8/10/2018	\$ 218.80
001132	8/10/2018	\$ 162.90
001133	8/10/2018	\$ 479.85
001134	8/10/2018	\$ 50.72
001135	11/13/2020	\$ 959.20
001136	8/10/2018	\$ 480.28
001136	11/13/2020	\$ 118.33
001137	8/10/2018	\$ 180.44
001138	8/10/2018	\$ 626.88
001139	8/10/2018	\$ 314.06

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001140	11/13/2020	\$ 192.64
001141	8/10/2018	\$ 298.87
001142	8/10/2018	\$ 131.31
001143	8/10/2018	\$ 72.45
001144	8/10/2018	\$ 98.08
001145	8/10/2018	\$ 310.00
001146	8/10/2018	\$ 301.59
001147	8/10/2018	\$ 96.15
001148	3/26/2019	\$ 468.11
001149	8/10/2018	\$ 125.40
001150	8/10/2018	\$ 1,062.81
001151	11/13/2020	\$ 95.47
001152	8/10/2018	\$ 73.15
001153	8/10/2018	\$ 59.05
001154	11/13/2020	\$ 95.25
001155	8/10/2018	\$ 52.77
001156	8/10/2018	\$ 110.44
001157	8/10/2018	\$ 159.75
001158	8/10/2018	\$ 82.00
001159	11/13/2020	\$ 93.00
001160	8/10/2018	\$ 89.93
001161	8/10/2018	\$ 164.41
001162	8/10/2018	\$ 140.95
001163	8/10/2018	\$ 824.69
001164	3/26/2019	\$ 74.65
001165	8/10/2018	\$ 260.80
001166	11/13/2020	\$ 228.80
001167	11/13/2020	\$ 100.58
001168	11/13/2020	\$ 82.13
001169	8/10/2018	\$ 82.68
001170	8/10/2018	\$ 278.18
001171	8/10/2018	\$ 503.10
001172	11/13/2020	\$ 105.19
001173	11/13/2020	\$ 85.58
001174	8/10/2018	\$ 187.71
001175	8/10/2018	\$ 172.00
001176	11/13/2020	\$ 105.73
001177	11/13/2020	\$ 113.79
001178	8/10/2018	\$ 244.99
001178	11/13/2020	\$ 13,917.89

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001179	8/10/2018	\$ 292.20
001180	8/10/2018	\$ 286.28
001181	11/13/2020	\$ 75.40
001182	8/10/2018	\$ 245.89
001183	11/13/2020	\$ 388.46
001184	8/10/2018	\$ 136.51
001185	3/26/2019	\$ 2,087.51
001186	8/10/2018	\$ 58.00
001187	8/10/2018	\$ 148.84
001188	8/10/2018	\$ 677.53
001189	8/10/2018	\$ 98.90
001190	8/10/2018	\$ 60.00
001191	11/13/2020	\$ 63.21
001192	8/10/2018	\$ 97.75
001193	8/10/2018	\$ 64.97
001194	11/13/2020	\$ 80.66
001195	8/10/2018	\$ 142.25
001196	8/10/2018	\$ 157.45
001197	11/13/2020	\$ 490.57
001198	11/13/2020	\$ 55.70
001199	8/10/2018	\$ 50.18
001200	11/13/2020	\$ 401.91
001201	8/10/2018	\$ 162.60
001202	8/10/2018	\$ 59.54
001203	8/10/2018	\$ 81.38
001204	11/13/2020	\$ 56.07
001205	8/10/2018	\$ 64.50
001206	11/13/2020	\$ 71.85
001207	8/10/2018	\$ 151.00
001208	8/10/2018	\$ 274.30
001209	8/10/2018	\$ 68.99
001210	11/13/2020	\$ 1,031.99
001211	11/13/2020	\$ 769.10
001212	11/13/2020	\$ 54.17
001213	11/13/2020	\$ 91.30
001214	8/10/2018	\$ 422.93
001215	8/10/2018	\$ 174.00
001216	8/10/2018	\$ 56.00
001217	8/10/2018	\$ 186.00
001218	8/10/2018	\$ 126.00

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001219	8/10/2018	\$ 60.00
001220	8/10/2018	\$ 374.90
001221	8/10/2018	\$ 498.10
001222	11/13/2020	\$ 204.12
001223	11/13/2020	\$ 248.79
001224	8/10/2018	\$ 85.81
001225	8/10/2018	\$ 165.00
001226	11/13/2020	\$ 454.00
001227	8/10/2018	\$ 87.46
001228	11/13/2020	\$ 82.32
001229	8/10/2018	\$ 178.48
001230	8/10/2018	\$ 336.94
001231	8/10/2018	\$ 66.00
001232	11/13/2020	\$ 66.00
001233	8/10/2018	\$ 97.54
001234	3/26/2019	\$ 354.80
001235	8/10/2018	\$ 206.25
001236	8/10/2018	\$ 98.00
001237	8/10/2018	\$ 290.29
001238	8/10/2018	\$ 350.19
001239	8/10/2018	\$ 56.10
001240	8/10/2018	\$ 201.88
001241	11/13/2020	\$ 107.50
001242	11/13/2020	\$ 183.25
001243	11/13/2020	\$ 58.63
001244	8/10/2018	\$ 86.97
001245	8/10/2018	\$ 69.60
001246	8/10/2018	\$ 156.00
001247	8/10/2018	\$ 81.09
001247	11/13/2020	\$ 115.12
001248	11/13/2020	\$ 1,223.44
001249	8/10/2018	\$ 92.50
001250	8/10/2018	\$ 56.40
001251	11/13/2020	\$ 65.85
001252	8/10/2018	\$ 120.00
001253	8/10/2018	\$ 1,051.00
001254	8/10/2018	\$ 330.99
001255	8/10/2018	\$ 212.29
001256	8/10/2018	\$ 143.47
001257	11/13/2020	\$ 391.08

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001258	8/10/2018	\$ 120.06
001259	11/13/2020	\$ 56.16
001260	8/10/2018	\$ 492.76
001261	8/10/2018	\$ 199.35
001262	8/10/2018	\$ 3,812.32
001263	8/10/2018	\$ 158.84
001264	11/13/2020	\$ 53.70
001265	8/10/2018	\$ 154.28
001266	3/26/2019	\$ 329.35
001267	8/10/2018	\$ 127.90
001268	11/13/2020	\$ 188.51
001269	8/10/2018	\$ 1,492.18
001270	8/10/2018	\$ 971.85
001271	8/10/2018	\$ 140.00
001272	8/10/2018	\$ 68.50
001273	11/13/2020	\$ 286.85
001274	8/10/2018	\$ 818.30
001275	11/13/2020	\$ 51.60
001276	8/10/2018	\$ 62.13
001277	8/10/2018	\$ 100.77
001278	8/10/2018	\$ 410.00
001279	8/10/2018	\$ 113.49
001280	8/10/2018	\$ 201.67
001281	8/10/2018	\$ 74.38
001282	11/13/2020	\$ 67.41
001283	8/10/2018	\$ 845.99
001284	8/10/2018	\$ 109.03
001285	11/13/2020	\$ 94.30
001286	11/13/2020	\$ 134.26
001287	8/10/2018	\$ 218.85
001288	8/10/2018	\$ 242.21
001289	11/13/2020	\$ 51.67
001290	8/10/2018	\$ 174.10
001291	11/13/2020	\$ 107.75
001292	8/10/2018	\$ 167.50
001293	11/13/2020	\$ 123.31
001294	8/10/2018	\$ 490.77
001295	8/10/2018	\$ 669.73
001296	8/10/2018	\$ 103.88
001297	8/10/2018	\$ 67.50

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001298	8/10/2018	\$ 92.84
001299	8/10/2018	\$ 68.96
001300	11/13/2020	\$ 1,091.38
001301	8/10/2018	\$ 87.00
001302	8/10/2018	\$ 639.75
001303	8/10/2018	\$ 211.90
001304	8/10/2018	\$ 678.95
001305	8/10/2018	\$ 78.98
001306	11/13/2020	\$ 123.05
001307	8/10/2018	\$ 537.69
001308	8/10/2018	\$ 1,166.38
001309	3/26/2019	\$ 138.75
001310	8/10/2018	\$ 610.04
001311	8/10/2018	\$ 541.12
001312	11/13/2020	\$ 2,113.95
001313	11/13/2020	\$ 403.92
001314	8/10/2018	\$ 402.72
001315	8/10/2018	\$ 165.57
001316	8/10/2018	\$ 161.98
001317	8/10/2018	\$ 77.79
001318	8/10/2018	\$ 1,011.08
001319	11/13/2020	\$ 63.56
001320	8/10/2018	\$ 66.66
001321	8/10/2018	\$ 207.16
001322	8/10/2018	\$ 102.00
001323	11/13/2020	\$ 71.16
001324	8/10/2018	\$ 362.00
001325	8/10/2018	\$ 212.40
001326	3/26/2019	\$ 2,301.31
001327	11/13/2020	\$ 860.74
001328	8/10/2018	\$ 58.96
001328	11/13/2020	\$ 216.34
001329	11/13/2020	\$ 81.11
001330	8/10/2018	\$ 66.83
001331	8/10/2018	\$ 60.10
001332	8/10/2018	\$ 1,712.43
001333	11/13/2020	\$ 92.07
001334	8/10/2018	\$ 129.20
001335	11/13/2020	\$ 50.66
001336	8/10/2018	\$ 240.34

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001337	8/10/2018	\$ 88.67
001338	8/10/2018	\$ 90.85
001339	11/13/2020	\$ 478.05
001340	11/13/2020	\$ 3,104.37
001341	11/13/2020	\$ 552.15
001342	8/10/2018	\$ 187.98
001343	11/13/2020	\$ 255.77
001344	8/10/2018	\$ 246.50
001345	11/13/2020	\$ 2,571.10
001346	11/13/2020	\$ 139.55
001347	8/10/2018	\$ 74.00
001348	8/10/2018	\$ 3,125.22
001349	11/13/2020	\$ 121.34
001350	11/13/2020	\$ 107.73
001351	11/13/2020	\$ 179.23
001352	8/10/2018	\$ 74.03
001353	11/13/2020	\$ 872.17
001354	8/10/2018	\$ 149.70
001354	11/13/2020	\$ 78.09
001355	11/13/2020	\$ 715.17
001356	11/13/2020	\$ 264.28
001357	11/13/2020	\$ 143.38
001358	11/13/2020	\$ 622.32
001359	8/10/2018	\$ 89.30
001360	8/10/2018	\$ 109.70
001361	8/10/2018	\$ 79.52
001362	8/10/2018	\$ 119.78
001363	8/10/2018	\$ 332.00
001364	8/10/2018	\$ 248.66
001365	8/10/2018	\$ 195.40
001366	11/13/2020	\$ 254.30
001367	8/10/2018	\$ 75.40
001368	8/10/2018	\$ 118.14
001369	8/10/2018	\$ 138.43
001370	8/10/2018	\$ 886.50
001371	8/10/2018	\$ 323.34
001372	11/13/2020	\$ 339.76
001373	8/10/2018	\$ 254.95
001374	8/10/2018	\$ 220.75
001375	8/10/2018	\$ 52.66

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001376	8/10/2018	\$ 76.83
001377	11/13/2020	\$ 58.69
001378	8/10/2018	\$ 59.00
001379	11/13/2020	\$ 65.00
001380	8/10/2018	\$ 71.13
001381	8/10/2018	\$ 55.37
001382	11/13/2020	\$ 430.40
001383	8/10/2018	\$ 137.06
001384	11/13/2020	\$ 97.00
001385	3/26/2019	\$ 290.41
001386	8/10/2018	\$ 66.40
001387	11/13/2020	\$ 147,963.20
001388	8/10/2018	\$ 504.00
001389	11/13/2020	\$ 81.73
001390	8/10/2018	\$ 408.63
001391	11/13/2020	\$ 60.84
001392	8/10/2018	\$ 435.32
001393	8/10/2018	\$ 59.20
001394	8/10/2018	\$ 1,252.25
001395	8/10/2018	\$ 99.00
001396	8/10/2018	\$ 180.36
001397	11/13/2020	\$ 351.85
001398	8/10/2018	\$ 79.60
001399	8/10/2018	\$ 390.00
001400	8/10/2018	\$ 131.84
001401	8/10/2018	\$ 127.90
001402	8/10/2018	\$ 91.44
001403	11/13/2020	\$ 390.66
001404	8/10/2018	\$ 235.60
001405	8/10/2018	\$ 74.06
001406	11/13/2020	\$ 1,770.09
001407	8/10/2018	\$ 128.40
001408	8/10/2018	\$ 121.00
001409	8/10/2018	\$ 54.00
001410	8/10/2018	\$ 214.89
001411	8/10/2018	\$ 73.52
001412	8/10/2018	\$ 112.44
001413	11/13/2020	\$ 129.18
001414	8/10/2018	\$ 75.89
001414	11/13/2020	\$ 447.07

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001415	11/13/2020	\$ 80.61
001416	8/10/2018	\$ 746.00
001417	11/13/2020	\$ 154.02
001418	8/10/2018	\$ 53.90
001419	8/10/2018	\$ 301.40
001420	8/10/2018	\$ 78.70
001421	11/13/2020	\$ 436.32
001422	11/13/2020	\$ 63.13
001423	8/10/2018	\$ 214.12
001424	8/10/2018	\$ 557.23
001425	11/13/2020	\$ 201.04
001426	8/10/2018	\$ 104.28
001427	8/10/2018	\$ 184.97
001428	8/10/2018	\$ 325.50
001429	8/10/2018	\$ 634.70
001430	8/10/2018	\$ 84.59
001431	11/13/2020	\$ 491.41
001432	11/13/2020	\$ 149.61
001433	8/10/2018	\$ 149.17
001434	8/10/2018	\$ 67.43
001435	8/10/2018	\$ 132.18
001436	8/10/2018	\$ 147.64
001437	8/10/2018	\$ 561.93
001438	11/13/2020	\$ 68.40
001439	8/10/2018	\$ 130.00
001440	8/10/2018	\$ 162.00
001441	8/10/2018	\$ 584.19
001442	11/13/2020	\$ 93.48
001443	8/10/2018	\$ 189.67
001444	8/10/2018	\$ 1,679.95
001445	8/10/2018	\$ 79.98
001446	11/13/2020	\$ 281.54
001447	8/10/2018	\$ 170.00
001448	8/10/2018	\$ 58.70
001449	8/10/2018	\$ 59.41
001450	11/13/2020	\$ 69.84
001451	11/13/2020	\$ 58.42
001452	8/10/2018	\$ 298.52
001453	8/10/2018	\$ 2,963.70
001454	8/10/2018	\$ 356.96

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001455	8/10/2018	\$ 138.70
001456	8/10/2018	\$ 56.18
001457	8/10/2018	\$ 93.74
001458	8/10/2018	\$ 116.13
001459	11/13/2020	\$ 95.68
001460	8/10/2018	\$ 372.80
001461	8/10/2018	\$ 177.38
001462	11/13/2020	\$ 60.57
001463	11/13/2020	\$ 103.50
001464	11/13/2020	\$ 499.78
001465	8/10/2018	\$ 176.13
001466	8/10/2018	\$ 721.68
001467	8/10/2018	\$ 228.01
001468	11/13/2020	\$ 386.64
001469	8/10/2018	\$ 86.97
001470	8/10/2018	\$ 159.16
001471	11/13/2020	\$ 174.40
001472	8/10/2018	\$ 93.09
001472	11/13/2020	\$ 723.18
001473	8/10/2018	\$ 357.50
001474	8/10/2018	\$ 246.13
001475	8/10/2018	\$ 454.98
001476	11/13/2020	\$ 128.78
001477	8/10/2018	\$ 481.54
001478	8/10/2018	\$ 829.08
001479	11/13/2020	\$ 240.02
001480	8/10/2018	\$ 73.41
001481	8/10/2018	\$ 614.68
001482	8/10/2018	\$ 61.15
001483	8/10/2018	\$ 200.76
001484	11/13/2020	\$ 228.93
001485	11/13/2020	\$ 116.89
001486	8/10/2018	\$ 1,155.44
001487	11/13/2020	\$ 255.10
001488	8/10/2018	\$ 130.13
001489	8/10/2018	\$ 59.82
001490	11/13/2020	\$ 189.44
001491	11/13/2020	\$ 57.85
001492	8/10/2018	\$ 200.00
001493	11/13/2020	\$ 163.46

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001494	8/10/2018	\$ 76.41
001495	8/10/2018	\$ 54.00
001496	11/13/2020	\$ 115.53
001497	8/10/2018	\$ 119.00
001498	8/10/2018	\$ 116.14
001499	8/10/2018	\$ 465.02
001500	8/10/2018	\$ 127.78
001501	11/13/2020	\$ 319.99
001502	11/13/2020	\$ 444.75
001503	8/10/2018	\$ 60.76
001504	8/10/2018	\$ 165.05
001505	8/10/2018	\$ 77.18
001506	8/10/2018	\$ 122.36
001507	8/10/2018	\$ 70.05
001508	8/10/2018	\$ 319.00
001509	11/13/2020	\$ 72.78
001510	8/10/2018	\$ 115.47
001511	11/13/2020	\$ 53.18
001512	11/13/2020	\$ 51.77
001513	8/10/2018	\$ 730.00
001514	8/10/2018	\$ 213.36
001515	8/10/2018	\$ 90.00
001516	8/10/2018	\$ 937.40
001517	8/10/2018	\$ 160.92
001518	8/10/2018	\$ 1,768.44
001519	8/10/2018	\$ 1,658.57
001520	8/10/2018	\$ 347.21
001521	8/10/2018	\$ 66.24
001522	8/10/2018	\$ 5,408.68
001523	8/10/2018	\$ 94.87
001524	8/10/2018	\$ 94.92
001525	8/10/2018	\$ 916.83
001526	11/13/2020	\$ 110.32
001527	8/10/2018	\$ 80.00
001528	11/13/2020	\$ 301.64
001529	11/13/2020	\$ 1,192.50
001530	8/10/2018	\$ 68.39
001531	8/10/2018	\$ 86.00
001532	8/10/2018	\$ 355.50
001533	8/10/2018	\$ 58.40

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001534	8/10/2018	\$ 117.15
001535	8/10/2018	\$ 69.48
001536	8/10/2018	\$ 72.79
001537	8/10/2018	\$ 278.28
001538	8/10/2018	\$ 3,329.57
001539	8/10/2018	\$ 80.00
001540	8/10/2018	\$ 243.66
001541	8/10/2018	\$ 50.35
001541	11/13/2020	\$ 73.70
001542	11/13/2020	\$ 159.39
001543	8/10/2018	\$ 323.80
001544	8/10/2018	\$ 1,207.50
001545	8/10/2018	\$ 245.37
001546	8/10/2018	\$ 141.87
001547	8/10/2018	\$ 50.40
001548	8/10/2018	\$ 350.60
001549	11/13/2020	\$ 61.83
001550	8/10/2018	\$ 87.98
001551	8/10/2018	\$ 230.50
001552	8/10/2018	\$ 71.05
001553	11/13/2020	\$ 199.43
001554	8/10/2018	\$ 7,830.17
001555	11/13/2020	\$ 83.60
001556	8/10/2018	\$ 194.93
001557	8/10/2018	\$ 53.94
001558	8/10/2018	\$ 59.39
001559	8/10/2018	\$ 75.89
001560	8/10/2018	\$ 117.60
001561	11/13/2020	\$ 2,314.13
001562	8/10/2018	\$ 723.52
001563	8/10/2018	\$ 54.32
001564	11/13/2020	\$ 165.83
001565	8/10/2018	\$ 63,153.04
001566	11/13/2020	\$ 56.66
001567	11/13/2020	\$ 136.08
001568	8/10/2018	\$ 52.89
001569	11/13/2020	\$ 67.20
001570	11/13/2020	\$ 2,943.20
001571	8/10/2018	\$ 933.30
001572	11/13/2020	\$ 69.35

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001573	8/10/2018	\$ 72.74
001574	11/13/2020	\$ 63.98
001575	8/10/2018	\$ 66.63
001576	8/10/2018	\$ 617.11
001577	8/10/2018	\$ 2,386.47
001578	8/10/2018	\$ 73.76
001579	8/10/2018	\$ 319.62
001580	8/10/2018	\$ 59.50
001581	8/10/2018	\$ 73.04
001582	11/13/2020	\$ 144.66
001583	11/13/2020	\$ 167.96
001584	11/13/2020	\$ 64.65
001585	8/10/2018	\$ 252.00
001586	11/13/2020	\$ 51.86
001587	8/10/2018	\$ 289.48
001588	8/10/2018	\$ 229.92
001589	11/13/2020	\$ 621.95
001590	3/26/2019	\$ 148.25
001591	8/10/2018	\$ 58.33
001592	8/10/2018	\$ 379.47
001593	8/10/2018	\$ 170.73
001594	8/10/2018	\$ 308.55
001595	8/10/2018	\$ 58.50
001596	8/10/2018	\$ 302.29
001597	8/10/2018	\$ 68.70
001598	8/10/2018	\$ 65.70
001599	11/13/2020	\$ 162.46
001600	8/10/2018	\$ 176.24
001601	8/10/2018	\$ 143.38
001602	8/10/2018	\$ 325.00
001603	11/13/2020	\$ 62.17
001604	8/10/2018	\$ 286.00
001605	8/10/2018	\$ 184.09
001606	8/10/2018	\$ 3,158.10
001607	11/13/2020	\$ 6,405.18
001608	3/26/2019	\$ 93.46
001609	8/10/2018	\$ 124.74
001610	8/10/2018	\$ 72.70
001611	11/13/2020	\$ 117.83
001612	11/13/2020	\$ 245.66

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001613	11/13/2020	\$ 328.86
001614	8/10/2018	\$ 291.96
001615	8/10/2018	\$ 358.20
001616	8/10/2018	\$ 206.10
001617	8/10/2018	\$ 356.20
001618	8/10/2018	\$ 793.10
001619	11/13/2020	\$ 518.92
001620	11/13/2020	\$ 120.93
001621	8/10/2018	\$ 1,213.33
001621	11/13/2020	\$ 1,651.26
001622	8/10/2018	\$ 93.71
001623	8/10/2018	\$ 90.83
001624	8/10/2018	\$ 248.00
001625	8/10/2018	\$ 510.40
001626	11/13/2020	\$ 197.78
001627	3/26/2019	\$ 423.67
001628	11/13/2020	\$ 232.30
001629	11/13/2020	\$ 277.20
001630	8/10/2018	\$ 663.92
001631	11/13/2020	\$ 177.51
001632	8/10/2018	\$ 538.62
001633	11/13/2020	\$ 53.08
001634	8/10/2018	\$ 445.68
001635	8/10/2018	\$ 133.00
001636	8/10/2018	\$ 208.00
001637	8/10/2018	\$ 207.39
001638	8/10/2018	\$ 245.23
001639	8/10/2018	\$ 52.30
001640	11/13/2020	\$ 103.66
001641	8/10/2018	\$ 371.90
001642	8/10/2018	\$ 52.69
001643	11/13/2020	\$ 728.25
001644	8/10/2018	\$ 136.51
001645	11/13/2020	\$ 13,758.65
001646	8/10/2018	\$ 555.66
001647	8/10/2018	\$ 1,641.61
001648	11/13/2020	\$ 77.96
001649	8/10/2018	\$ 135.76
001650	11/13/2020	\$ 768.18
001651	8/10/2018	\$ 79.25

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001652	11/13/2020	\$ 79.51
001653	8/10/2018	\$ 900.52
001654	8/10/2018	\$ 188.10
001655	8/10/2018	\$ 132.51
001656	11/13/2020	\$ 56.77
001657	11/13/2020	\$ 92.62
001658	8/10/2018	\$ 65.45
001659	11/13/2020	\$ 970.20
001660	8/10/2018	\$ 75.80
001661	11/13/2020	\$ 78.39
001662	8/10/2018	\$ 80.33
001663	11/13/2020	\$ 233.05
001664	8/10/2018	\$ 232.14
001665	8/10/2018	\$ 131.62
001666	11/13/2020	\$ 108.70
001667	8/10/2018	\$ 66.70
001668	8/10/2018	\$ 1,238.57
001669	11/13/2020	\$ 81.91
001670	3/26/2019	\$ 3,936.42
001671	8/10/2018	\$ 61.32
001672	8/10/2018	\$ 142.94
001673	8/10/2018	\$ 68.41
001674	8/10/2018	\$ 886.41
001675	11/13/2020	\$ 3,450.47
001676	8/10/2018	\$ 121.80
001677	8/10/2018	\$ 68.85
001678	8/10/2018	\$ 298.70
001679	8/10/2018	\$ 67.99
001680	8/10/2018	\$ 72.36
001681	8/10/2018	\$ 553.54
001682	11/13/2020	\$ 220.26
001683	8/10/2018	\$ 69.75
001684	11/13/2020	\$ 1,087.69
001685	8/10/2018	\$ 390.43
001686	8/10/2018	\$ 66.40
001687	11/13/2020	\$ 59.97
001688	8/10/2018	\$ 385.57
001689	11/13/2020	\$ 499.40
001690	11/13/2020	\$ 187.58
001691	11/13/2020	\$ 196.81

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001692	8/10/2018	\$ 92.05
001693	8/10/2018	\$ 163.37
001694	8/10/2018	\$ 597.40
001695	11/13/2020	\$ 62.41
001696	8/10/2018	\$ 99.00
001697	11/13/2020	\$ 493.51
001698	8/10/2018	\$ 51.96
001699	8/10/2018	\$ 61.25
001700	8/10/2018	\$ 172.00
001701	8/10/2018	\$ 897.26
001702	8/10/2018	\$ 163.12
001703	11/13/2020	\$ 62.52
001704	8/10/2018	\$ 77.03
001705	11/13/2020	\$ 73.95
001706	11/13/2020	\$ 61.68
001707	8/10/2018	\$ 83.43
001708	11/13/2020	\$ 52.29
001709	8/10/2018	\$ 272.98
001710	8/10/2018	\$ 68.69
001711	8/10/2018	\$ 1,123.58
001712	8/10/2018	\$ 60.80
001713	11/13/2020	\$ 499.91
001714	11/13/2020	\$ 252.96
001715	8/10/2018	\$ 52.58
001716	8/10/2018	\$ 444.29
001717	8/10/2018	\$ 173.72
001718	8/10/2018	\$ 56.32
001719	11/13/2020	\$ 142.53
001720	11/13/2020	\$ 85.80
001721	8/10/2018	\$ 51.94
001722	8/10/2018	\$ 90.20
001723	11/13/2020	\$ 450.28
001724	8/10/2018	\$ 87.66
001724	11/13/2020	\$ 375.40
001725	3/26/2019	\$ 864.07
001726	11/13/2020	\$ 335.82
001727	11/13/2020	\$ 294.32
001728	8/10/2018	\$ 117.70
001729	11/13/2020	\$ 119.77
001730	11/13/2020	\$ 99.91

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001731	11/13/2020	\$ 362.11
001732	8/10/2018	\$ 75.96
001733	8/10/2018	\$ 196.96
001734	11/13/2020	\$ 275.31
001735	8/10/2018	\$ 256.89
001736	8/10/2018	\$ 57.78
001737	11/13/2020	\$ 81.14
001738	8/10/2018	\$ 92.00
001739	8/10/2018	\$ 282.16
001740	8/10/2018	\$ 245.45
001741	11/13/2020	\$ 50.04
001742	11/13/2020	\$ 194.72
001743	8/10/2018	\$ 733.33
001744	11/13/2020	\$ 55.34
001745	8/10/2018	\$ 59.70
001746	11/13/2020	\$ 108.40
001747	8/10/2018	\$ 50.90
001748	8/10/2018	\$ 119.95
001749	8/10/2018	\$ 125.40
001750	11/13/2020	\$ 368.06
001751	8/10/2018	\$ 59.75
001752	8/10/2018	\$ 270.36
001753	8/10/2018	\$ 86.57
001754	8/10/2018	\$ 80.17
001755	8/10/2018	\$ 92.16
001756	8/10/2018	\$ 198.13
001757	11/13/2020	\$ 73.30
001758	11/13/2020	\$ 72.77
001759	11/13/2020	\$ 730.96
001760	8/10/2018	\$ 987.68
001761	11/13/2020	\$ 110.67
001762	8/10/2018	\$ 126.59
001763	8/10/2018	\$ 336.97
001764	8/10/2018	\$ 62.15
001765	8/10/2018	\$ 1,736.81
001765	11/13/2020	\$ 1,010.07
001766	8/10/2018	\$ 261.45
001767	8/10/2018	\$ 55.11
001768	8/10/2018	\$ 185.77
001769	8/10/2018	\$ 267.38

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001770	8/10/2018	\$ 84.08
001771	11/13/2020	\$ 1,133.94
001772	11/13/2020	\$ 54.73
001773	11/13/2020	\$ 95.62
001774	11/13/2020	\$ 3,329.65
001775	8/10/2018	\$ 120.71
001776	8/10/2018	\$ 184.04
001777	8/10/2018	\$ 58.60
001778	11/13/2020	\$ 223.43
001779	8/10/2018	\$ 51.60
001780	8/10/2018	\$ 855.60
001781	11/13/2020	\$ 162.69
001782	8/10/2018	\$ 99.40
001783	8/10/2018	\$ 87.44
001784	11/13/2020	\$ 56.57
001785	11/13/2020	\$ 278.57
001786	11/13/2020	\$ 69.92
001787	8/10/2018	\$ 155.73
001788	8/10/2018	\$ 106.96
001789	11/13/2020	\$ 164.25
001790	8/10/2018	\$ 214.54
001791	8/10/2018	\$ 291.77
001792	8/10/2018	\$ 206.63
001793	11/13/2020	\$ 131.92
001794	8/10/2018	\$ 108.00
001795	8/10/2018	\$ 52.12
001796	8/10/2018	\$ 138.50
001797	8/10/2018	\$ 176.00
001798	8/10/2018	\$ 1,195.42
001799	8/10/2018	\$ 594.13
001800	11/13/2020	\$ 111.40
001801	8/10/2018	\$ 71.50
001802	11/13/2020	\$ 1,506.58
001803	8/10/2018	\$ 244.40
001804	11/13/2020	\$ 3,282.50
001805	3/26/2019	\$ 1,110.77
001806	11/13/2020	\$ 51.69
001807	11/13/2020	\$ 1,888.46
001808	11/13/2020	\$ 90.99
001809	8/10/2018	\$ 64.73

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001810	8/10/2018	\$ 470.91
001811	11/13/2020	\$ 143.68
001812	8/10/2018	\$ 108.00
001813	8/10/2018	\$ 484.05
001814	8/10/2018	\$ 57.55
001815	8/10/2018	\$ 2,235.22
001816	8/10/2018	\$ 864.00
001817	8/10/2018	\$ 232.08
001818	8/10/2018	\$ 345.00
001819	11/13/2020	\$ 176.84
001820	8/10/2018	\$ 296.37
001821	11/13/2020	\$ 218.58
001822	8/10/2018	\$ 257.28
001823	11/13/2020	\$ 690.25
001824	11/13/2020	\$ 3,229.19
001825	8/10/2018	\$ 97.50
001826	8/10/2018	\$ 91.26
001827	11/13/2020	\$ 110.79
001828	8/10/2018	\$ 1,476.00
001829	8/10/2018	\$ 96.09
001830	8/10/2018	\$ 79.67
001831	8/10/2018	\$ 98.99
001832	8/10/2018	\$ 54.61
001833	11/13/2020	\$ 64.01
001834	8/10/2018	\$ 86.20
001835	8/10/2018	\$ 310.51
001836	8/10/2018	\$ 311.92
001837	8/10/2018	\$ 539.57
001837	11/13/2020	\$ 727.54
001838	8/10/2018	\$ 360.00
001838	11/13/2020	\$ 491.92
001839	8/10/2018	\$ 57.80
001840	11/13/2020	\$ 212.15
001841	11/13/2020	\$ 53.99
001842	8/10/2018	\$ 1,457.85
001843	8/10/2018	\$ 135.93
001844	8/10/2018	\$ 84.70
001845	8/10/2018	\$ 154.28
001845	11/13/2020	\$ 1,700.92
001846	8/10/2018	\$ 139.50

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001847	8/10/2018	\$ 126.33
001848	8/10/2018	\$ 506.00
001849	8/10/2018	\$ 184.58
001850	8/10/2018	\$ 72.80
001851	8/10/2018	\$ 90.09
001852	8/10/2018	\$ 84.42
001853	11/13/2020	\$ 56.31
001854	8/10/2018	\$ 545.49
001855	8/10/2018	\$ 112.80
001856	8/10/2018	\$ 352.23
001856	11/13/2020	\$ 888.99
001857	11/13/2020	\$ 2,423.93
001858	8/10/2018	\$ 207.45
001859	8/10/2018	\$ 165.76
001860	11/13/2020	\$ 67.43
001861	8/10/2018	\$ 63.80
001862	8/10/2018	\$ 80.00
001863	11/13/2020	\$ 50.60
001864	8/10/2018	\$ 314.06
001865	11/13/2020	\$ 132.32
001866	11/13/2020	\$ 158.32
001867	8/10/2018	\$ 89.66
001868	8/10/2018	\$ 75.90
001869	8/10/2018	\$ 74.83
001870	8/10/2018	\$ 147.08
001871	11/13/2020	\$ 107.26
001872	8/10/2018	\$ 387.85
001873	8/10/2018	\$ 217.60
001874	3/26/2019	\$ 227.31
001875	11/13/2020	\$ 141.38
001876	11/13/2020	\$ 144.67
001877	11/13/2020	\$ 52.96
001878	8/10/2018	\$ 3,923.07
001878	11/13/2020	\$ 69.73
001879	8/10/2018	\$ 30,644.63
001880	8/10/2018	\$ 88.90
001881	8/10/2018	\$ 354.00
001882	11/13/2020	\$ 61.18
001883	8/10/2018	\$ 371.79
001884	11/13/2020	\$ 108.24

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
001885	8/10/2018	\$ 80.40
001886	8/10/2018	\$ 187.84
001887	11/13/2020	\$ 329.44
001888	8/10/2018	\$ 64.37
001889	8/10/2018	\$ 131.20
001890	8/10/2018	\$ 102.24
001891	8/10/2018	\$ 770.60
001892	8/10/2018	\$ 73.60
001893	8/10/2018	\$ 4,074.00
001894	8/10/2018	\$ 515.25
001895	11/13/2020	\$ 211.98
001896	8/10/2018	\$ 177.12
001897	8/10/2018	\$ 131.84
001898	11/13/2020	\$ 54.00
001899	11/13/2020	\$ 247.25
001900	8/10/2018	\$ 52.00
001901	8/10/2018	\$ 83.94
001902	8/10/2018	\$ 192.41
001903	11/13/2020	\$ 1,163.88
001904	8/10/2018	\$ 132.98
001905	8/10/2018	\$ 83.13
001906	8/10/2018	\$ 260.00
001907	11/13/2020	\$ 932.13
001908	11/13/2020	\$ 51.01
001909	11/13/2020	\$ 103.48
001910	8/10/2018	\$ 174.25
001911	8/10/2018	\$ 103.50
001912	8/10/2018	\$ 65.25
001913	11/13/2020	\$ 87.92
001914	8/10/2018	\$ 64.10
001915	8/10/2018	\$ 62.55
001916	8/10/2018	\$ 142.89
001917	11/13/2020	\$ 71.90
001918	8/10/2018	\$ 251.98
001919	8/10/2018	\$ 161.30
001920	8/10/2018	\$ 110.69
001921	8/10/2018	\$ 1,056.25
001922	3/26/2019	\$ 73.91
001923	8/10/2018	\$ 174.55
001924	8/10/2018	\$ 159.12

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001925	8/10/2018	\$ 67.85
001926	8/10/2018	\$ 1,004.97
001927	11/13/2020	\$ 249.46
001928	8/10/2018	\$ 61.89
001929	8/10/2018	\$ 112.47
001930	8/10/2018	\$ 87.65
001931	3/26/2019	\$ 182.70
001932	8/10/2018	\$ 338.60
001933	8/10/2018	\$ 56.09
001934	8/10/2018	\$ 701.49
001935	8/10/2018	\$ 451.20
001936	8/10/2018	\$ 276.87
001937	8/10/2018	\$ 156.17
001938	11/13/2020	\$ 97.18
001939	11/13/2020	\$ 119.68
001940	8/10/2018	\$ 85.00
001941	11/13/2020	\$ 230.08
001942	8/10/2018	\$ 772.00
001943	11/13/2020	\$ 681.67
001944	11/13/2020	\$ 244.08
001945	8/10/2018	\$ 351.53
001946	8/10/2018	\$ 106.08
001947	11/13/2020	\$ 11,690.02
001948	8/10/2018	\$ 213.58
001949	8/10/2018	\$ 103.84
001950	8/10/2018	\$ 59.51
001951	8/10/2018	\$ 581.21
001952	8/10/2018	\$ 78.80
001953	11/13/2020	\$ 4,375.95
001954	8/10/2018	\$ 146.00
001955	8/10/2018	\$ 217.46
001956	3/26/2019	\$ 65.70
001957	8/10/2018	\$ 582.99
001958	8/10/2018	\$ 588.64
001959	8/10/2018	\$ 66.08
001960	11/13/2020	\$ 54.72
001961	11/13/2020	\$ 223.89
001962	8/10/2018	\$ 754.48
001963	11/13/2020	\$ 86.64
001964	11/13/2020	\$ 237.34

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
001965	8/10/2018	\$ 101.32
001966	8/10/2018	\$ 62.35
001967	8/10/2018	\$ 284.98
001968	8/10/2018	\$ 186.74
001969	8/10/2018	\$ 1,365.00
001970	8/10/2018	\$ 118.00
001971	11/13/2020	\$ 61.77
001972	8/10/2018	\$ 69.75
001973	8/10/2018	\$ 323.91
001974	8/10/2018	\$ 71.64
001975	11/13/2020	\$ 746.73
001976	11/13/2020	\$ 885.07
001977	3/26/2019	\$ 11,674.50
001978	8/10/2018	\$ 370.49
001979	8/10/2018	\$ 124.50
001980	8/10/2018	\$ 148.00
001981	8/10/2018	\$ 803.70
001982	8/10/2018	\$ 197.76
001983	8/10/2018	\$ 94.17
001984	8/10/2018	\$ 100.20
001985	11/13/2020	\$ 52.76
001986	8/10/2018	\$ 55.15
001987	8/10/2018	\$ 71.04
001988	8/10/2018	\$ 55.80
001989	11/13/2020	\$ 62.78
001990	8/10/2018	\$ 62.60
001991	8/10/2018	\$ 85.47
001992	8/10/2018	\$ 533.16
001993	8/10/2018	\$ 122.73
001994	8/10/2018	\$ 3,523.68
001995	8/10/2018	\$ 135.70
001996	8/10/2018	\$ 174.09
001997	8/10/2018	\$ 78.55
001998	8/10/2018	\$ 331.94
001999	11/13/2020	\$ 58.75
002000	8/10/2018	\$ 1,727.32
002001	8/10/2018	\$ 230.96
002002	8/10/2018	\$ 337.30
002003	8/10/2018	\$ 68.80
002004	8/10/2018	\$ 406.64

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002005	8/10/2018	\$ 94.88
002006	8/10/2018	\$ 59.40
002007	11/13/2020	\$ 61.50
002008	8/10/2018	\$ 93.00
002009	8/10/2018	\$ 443.21
002010	11/13/2020	\$ 267.34
002011	11/13/2020	\$ 76.26
002012	8/10/2018	\$ 131.88
002013	8/10/2018	\$ 66.25
002014	8/10/2018	\$ 101.86
002015	8/10/2018	\$ 65.70
002016	8/10/2018	\$ 102.15
002017	11/13/2020	\$ 224.82
002018	11/13/2020	\$ 70.41
002019	8/10/2018	\$ 281.71
002020	11/13/2020	\$ 590.44
002021	8/10/2018	\$ 2,243.50
002022	11/13/2020	\$ 892.55
002023	11/13/2020	\$ 54.17
002024	8/10/2018	\$ 78.75
002025	8/10/2018	\$ 101.70
002026	11/13/2020	\$ 168.90
002027	11/13/2020	\$ 114.34
002028	8/10/2018	\$ 60.55
002029	3/26/2019	\$ 54.06
002030	3/26/2019	\$ 16,985.94
002031	8/10/2018	\$ 161.63
002032	8/10/2018	\$ 310.86
002033	8/10/2018	\$ 493.51
002034	8/10/2018	\$ 157.49
002035	8/10/2018	\$ 296.19
002036	8/10/2018	\$ 74.00
002037	8/10/2018	\$ 448.50
002038	8/10/2018	\$ 633.58
002039	8/10/2018	\$ 109.08
002040	8/10/2018	\$ 51.38
002041	8/10/2018	\$ 340.48
002042	8/10/2018	\$ 172.05
002043	11/13/2020	\$ 1,038.29
002044	8/10/2018	\$ 91.31

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002045	11/13/2020	\$ 87.07
002046	3/26/2019	\$ 2,157.71
002047	11/13/2020	\$ 261.26
002048	8/10/2018	\$ 288.47
002049	8/10/2018	\$ 58.55
002050	8/10/2018	\$ 64.52
002051	8/10/2018	\$ 154.73
002052	11/13/2020	\$ 15,564.04
002053	3/26/2019	\$ 91.87
002054	8/10/2018	\$ 117.50
002055	8/10/2018	\$ 53.00
002056	8/10/2018	\$ 85.36
002057	8/10/2018	\$ 68.90
002058	11/13/2020	\$ 153.44
002059	8/10/2018	\$ 87.35
002059	11/13/2020	\$ 266.02
002060	8/10/2018	\$ 93.40
002061	11/13/2020	\$ 874.65
002062	8/10/2018	\$ 103.20
002063	8/10/2018	\$ 335.40
002064	8/10/2018	\$ 398.80
002065	11/13/2020	\$ 51.68
002066	8/10/2018	\$ 78.39
002067	8/10/2018	\$ 8,929.56
002068	11/13/2020	\$ 68.84
002069	11/13/2020	\$ 1,412.85
002070	8/10/2018	\$ 524.38
002071	8/10/2018	\$ 80.46
002072	8/10/2018	\$ 120.00
002073	8/10/2018	\$ 626.40
002074	8/10/2018	\$ 68.90
002075	11/13/2020	\$ 258.23
002076	8/10/2018	\$ 128.48
002077	8/10/2018	\$ 1,133.04
002078	8/10/2018	\$ 162.48
002079	8/10/2018	\$ 59.20
002080	8/10/2018	\$ 75.39
002081	8/10/2018	\$ 105.07
002082	8/10/2018	\$ 78.45
002083	11/13/2020	\$ 363.90

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002084	11/13/2020	\$ 61.09
002085	8/10/2018	\$ 101.68
002086	8/10/2018	\$ 73.50
002087	8/10/2018	\$ 103.18
002088	8/10/2018	\$ 88.63
002089	8/10/2018	\$ 5,375.00
002090	11/13/2020	\$ 100.18
002091	8/10/2018	\$ 418.25
002092	11/13/2020	\$ 231.65
002093	8/10/2018	\$ 155.98
002094	11/13/2020	\$ 69.59
002095	8/10/2018	\$ 2,754.32
002096	8/10/2018	\$ 527.18
002097	8/10/2018	\$ 70.35
002098	11/13/2020	\$ 183.03
002099	8/10/2018	\$ 164.00
002100	11/13/2020	\$ 63.36
002101	8/10/2018	\$ 205.45
002102	8/10/2018	\$ 96.30
002103	8/10/2018	\$ 371.98
002104	8/10/2018	\$ 78.00
002105	8/10/2018	\$ 73.65
002106	11/13/2020	\$ 1,035.57
002107	11/13/2020	\$ 74.03
002108	8/10/2018	\$ 56.40
002109	8/10/2018	\$ 57.95
002110	8/10/2018	\$ 2,236.19
002110	11/13/2020	\$ 465.12
002111	3/26/2019	\$ 6,880.93
002112	11/13/2020	\$ 73.19
002113	3/26/2019	\$ 276.90
002114	8/10/2018	\$ 2,877.19
002115	8/10/2018	\$ 65.09
002116	8/10/2018	\$ 337.39
002117	8/10/2018	\$ 234.00
002118	8/10/2018	\$ 1,274.87
002119	8/10/2018	\$ 385.42
002120	11/13/2020	\$ 78.39
002121	8/10/2018	\$ 99.49
002122	11/13/2020	\$ 91.55

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002123	8/10/2018	\$ 165.25
002124	8/10/2018	\$ 132.10
002125	11/13/2020	\$ 130.85
002126	8/10/2018	\$ 345.50
002127	8/10/2018	\$ 107.49
002128	11/13/2020	\$ 2,642.75
002129	11/13/2020	\$ 117.07
002130	8/10/2018	\$ 2,777.36
002131	8/10/2018	\$ 128.54
002131	11/13/2020	\$ 68.33
002132	8/10/2018	\$ 295.20
002133	8/10/2018	\$ 114.67
002134	11/13/2020	\$ 102.20
002135	8/10/2018	\$ 75.00
002136	8/10/2018	\$ 301.34
002137	8/10/2018	\$ 69.90
002138	8/10/2018	\$ 120.40
002139	11/13/2020	\$ 79.58
002140	11/13/2020	\$ 66.60
002141	8/10/2018	\$ 638.00
002142	8/10/2018	\$ 3,106.88
002143	11/13/2020	\$ 66.15
002144	11/13/2020	\$ 293.28
002145	8/10/2018	\$ 320.59
002146	8/10/2018	\$ 616.00
002147	11/13/2020	\$ 97.83
002148	8/10/2018	\$ 109.96
002148	11/13/2020	\$ 52.00
002149	8/10/2018	\$ 93.96
002150	8/10/2018	\$ 141.07
002151	11/13/2020	\$ 51.70
002152	8/10/2018	\$ 696.67
002153	8/10/2018	\$ 82.50
002154	11/13/2020	\$ 88.82
002155	8/10/2018	\$ 17,375.92
002156	3/26/2019	\$ 212.29
002157	8/10/2018	\$ 217.71
002158	8/10/2018	\$ 577.93
002158	11/13/2020	\$ 79.05
002159	8/10/2018	\$ 257.03

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002160	8/10/2018	\$ 222.00
002161	8/10/2018	\$ 105.00
002162	8/10/2018	\$ 459.97
002163	11/13/2020	\$ 51.06
002164	11/13/2020	\$ 165.22
002165	8/10/2018	\$ 597.64
002166	11/13/2020	\$ 261.30
002167	11/13/2020	\$ 214.79
002168	8/10/2018	\$ 59.00
002169	8/10/2018	\$ 128.74
002170	8/10/2018	\$ 351.90
002171	8/10/2018	\$ 135.45
002171	11/13/2020	\$ 1,712.79
002172	8/10/2018	\$ 51.46
002173	8/10/2018	\$ 60.74
002174	8/10/2018	\$ 210.98
002175	11/13/2020	\$ 165.60
002176	8/10/2018	\$ 67.10
002177	11/13/2020	\$ 268.37
002178	8/10/2018	\$ 93.66
002179	8/10/2018	\$ 26,347.04
002180	8/10/2018	\$ 53.87
002181	8/10/2018	\$ 675.49
002182	11/13/2020	\$ 73.40
002183	8/10/2018	\$ 505.46
002183	11/13/2020	\$ 65.07
002184	8/10/2018	\$ 97.40
002185	8/10/2018	\$ 60.95
002186	8/10/2018	\$ 204.78
002187	8/10/2018	\$ 92.21
002188	8/10/2018	\$ 70.21
002189	8/10/2018	\$ 211.77
002190	8/10/2018	\$ 311.64
002191	11/13/2020	\$ 472.79
002192	8/10/2018	\$ 402.37
002193	8/10/2018	\$ 190.90
002194	8/10/2018	\$ 306.00
002195	8/10/2018	\$ 59.50
002196	8/10/2018	\$ 86.10
002197	8/10/2018	\$ 2,375.51

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002198	8/10/2018	\$ 345.93
002199	8/10/2018	\$ 109.00
002200	8/10/2018	\$ 308.88
002201	8/10/2018	\$ 526.50
002202	11/13/2020	\$ 86.23
002203	8/10/2018	\$ 489.33
002204	8/10/2018	\$ 152.15
002205	8/10/2018	\$ 1,122.91
002206	11/13/2020	\$ 95.52
002207	8/10/2018	\$ 152.99
002208	8/10/2018	\$ 94.32
002209	8/10/2018	\$ 1,458.23
002210	8/10/2018	\$ 534.05
002211	11/13/2020	\$ 176.00
002212	8/10/2018	\$ 116.90
002213	11/13/2020	\$ 150.12
002214	8/10/2018	\$ 73.90
002215	8/10/2018	\$ 126.16
002216	8/10/2018	\$ 471.70
002217	11/13/2020	\$ 227.56
002218	8/10/2018	\$ 401.58
002219	11/13/2020	\$ 141.13
002220	8/10/2018	\$ 121.39
002221	8/10/2018	\$ 450.30
002222	11/13/2020	\$ 137.53
002223	8/10/2018	\$ 821.00
002224	8/10/2018	\$ 140.34
002225	11/13/2020	\$ 64.50
002226	8/10/2018	\$ 50.46
002227	8/10/2018	\$ 322.80
002228	8/10/2018	\$ 67.40
002229	8/10/2018	\$ 58.29
002230	11/13/2020	\$ 74.79
002231	11/13/2020	\$ 442.40
002232	8/10/2018	\$ 133.11
002233	11/13/2020	\$ 184.12
002234	8/10/2018	\$ 397.84
002235	8/10/2018	\$ 119.42
002236	8/10/2018	\$ 80.90
002237	11/13/2020	\$ 829.65

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002238	11/13/2020	\$ 318.01
002239	11/13/2020	\$ 86.13
002240	8/10/2018	\$ 280.66
002241	11/13/2020	\$ 69.76
002242	8/10/2018	\$ 62.33
002243	11/13/2020	\$ 99.31
002244	8/10/2018	\$ 412.13
002245	8/10/2018	\$ 135.20
002246	8/10/2018	\$ 59.78
002247	8/10/2018	\$ 2,120.48
002248	11/13/2020	\$ 51.42
002249	8/10/2018	\$ 217.26
002250	8/10/2018	\$ 220.00
002251	8/10/2018	\$ 472.80
002252	8/10/2018	\$ 333.64
002253	8/10/2018	\$ 148.90
002254	11/13/2020	\$ 76.20
002255	8/10/2018	\$ 167.83
002256	8/10/2018	\$ 339.02
002257	8/10/2018	\$ 199.52
002257	11/13/2020	\$ 458.35
002258	8/10/2018	\$ 499.50
002259	8/10/2018	\$ 12,054.35
002260	11/13/2020	\$ 190.11
002261	8/10/2018	\$ 198.28
002262	11/13/2020	\$ 57.86
002263	3/26/2019	\$ 146.54
002264	8/10/2018	\$ 1,498.55
002265	8/10/2018	\$ 585.53
002266	11/13/2020	\$ 300.65
002267	8/10/2018	\$ 264.90
002268	11/13/2020	\$ 401.50
002269	8/10/2018	\$ 618.00
002270	8/10/2018	\$ 410.89
002271	8/10/2018	\$ 12,128.71
002272	11/13/2020	\$ 492.30
002273	8/10/2018	\$ 55.64
002274	8/10/2018	\$ 88.83
002275	11/13/2020	\$ 166.57
002276	8/10/2018	\$ 172.03

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002277	8/10/2018	\$ 72.00
002278	8/10/2018	\$ 84.41
002279	8/10/2018	\$ 54.38
002280	11/13/2020	\$ 158.17
002281	11/13/2020	\$ 759.73
002282	11/13/2020	\$ 121.76
002283	8/10/2018	\$ 171.70
002284	11/13/2020	\$ 753.78
002285	8/10/2018	\$ 663.51
002286	8/10/2018	\$ 207.20
002287	8/10/2018	\$ 735.20
002288	8/10/2018	\$ 445.56
002289	8/10/2018	\$ 911.45
002290	8/10/2018	\$ 65.94
002291	8/10/2018	\$ 348.82
002292	8/10/2018	\$ 349.90
002293	8/10/2018	\$ 671.75
002294	11/13/2020	\$ 187.23
002295	11/13/2020	\$ 60.17
002296	11/13/2020	\$ 1,744.17
002297	8/10/2018	\$ 53.20
002298	8/10/2018	\$ 91.94
002299	8/10/2018	\$ 355.00
002300	8/10/2018	\$ 803.89
002301	11/13/2020	\$ 174.46
002302	8/10/2018	\$ 92.19
002303	3/26/2019	\$ 205.91
002304	8/10/2018	\$ 249.28
002305	8/10/2018	\$ 62.07
002306	8/10/2018	\$ 23,158.53
002307	11/13/2020	\$ 248.10
002308	11/13/2020	\$ 135.60
002309	11/13/2020	\$ 56.46
002310	11/13/2020	\$ 229.99
002311	11/13/2020	\$ 190.08
002312	11/13/2020	\$ 51.07
002313	8/10/2018	\$ 93.50
002314	11/13/2020	\$ 64.57
002315	11/13/2020	\$ 70.81
002316	11/13/2020	\$ 65.77

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002317	8/10/2018	\$ 64.20
002318	8/10/2018	\$ 185.51
002319	8/10/2018	\$ 120.27
002320	11/13/2020	\$ 317.77
002321	8/10/2018	\$ 121.07
002322	8/10/2018	\$ 717.98
002322	11/13/2020	\$ 115.58
002323	8/10/2018	\$ 59.55
002324	11/13/2020	\$ 116.30
002324	3/26/2019	\$ 114.38
002325	8/10/2018	\$ 143.97
002326	8/10/2018	\$ 842.45
002327	8/10/2018	\$ 450.35
002328	8/10/2018	\$ 58.50
002329	8/10/2018	\$ 299.80
002330	8/10/2018	\$ 116.00
002331	8/10/2018	\$ 95.40
002332	8/10/2018	\$ 126.97
002333	11/13/2020	\$ 56.67
002334	11/13/2020	\$ 170.72
002335	11/13/2020	\$ 832.92
002336	11/13/2020	\$ 96.03
002337	8/10/2018	\$ 288.00
002338	8/10/2018	\$ 275.45
002339	11/13/2020	\$ 156.07
002340	11/13/2020	\$ 237.81
002341	8/10/2018	\$ 66.28
002342	8/10/2018	\$ 57.61
002343	8/10/2018	\$ 78.89
002344	8/10/2018	\$ 187.37
002345	8/10/2018	\$ 185.20
002346	8/10/2018	\$ 58.97
002347	8/10/2018	\$ 64.10
002348	8/10/2018	\$ 80.50
002349	8/10/2018	\$ 59.59
002349	11/13/2020	\$ 53.28
002350	8/10/2018	\$ 138.69
002351	8/10/2018	\$ 68.65
002351	11/13/2020	\$ 204.44
002352	8/10/2018	\$ 127.76

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002353	8/10/2018	\$ 255.66
002354	11/13/2020	\$ 375.91
002355	11/13/2020	\$ 233.76
002356	8/10/2018	\$ 521.05
002357	8/10/2018	\$ 40,278.00
002358	8/10/2018	\$ 62.93
002359	8/10/2018	\$ 88.16
002360	8/10/2018	\$ 451.42
002361	8/10/2018	\$ 172.90
002362	8/10/2018	\$ 221.00
002363	8/10/2018	\$ 54.72
002363	11/13/2020	\$ 283.53
002364	8/10/2018	\$ 3,840.75
002365	8/10/2018	\$ 70.89
002365	3/26/2019	\$ 65.29
002366	8/10/2018	\$ 108.00
002367	8/10/2018	\$ 146.06
002368	8/10/2018	\$ 185.00
002369	11/13/2020	\$ 52.73
002370	8/10/2018	\$ 179.61
002371	8/10/2018	\$ 2,219.86
002371	11/13/2020	\$ 594.91
002372	8/10/2018	\$ 61.95
002373	8/10/2018	\$ 54.99
002374	8/10/2018	\$ 176.87
002375	8/10/2018	\$ 63.55
002376	11/13/2020	\$ 4,990.90
002377	11/13/2020	\$ 103.20
002378	8/10/2018	\$ 244.15
002379	8/10/2018	\$ 420.39
002380	11/13/2020	\$ 529.94
002381	11/13/2020	\$ 317.65
002382	8/10/2018	\$ 1,194.44
002382	11/13/2020	\$ 3,141.17
002383	11/13/2020	\$ 59.38
002384	8/10/2018	\$ 222.50
002385	8/10/2018	\$ 74.38
002386	11/13/2020	\$ 54.22
002387	8/10/2018	\$ 1,921.52
002388	8/10/2018	\$ 468.43

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002389	3/26/2019	\$ 210.26
002390	11/13/2020	\$ 134.71
002391	8/10/2018	\$ 3,143.92
002392	11/13/2020	\$ 183.47
002393	8/10/2018	\$ 184.27
002394	11/13/2020	\$ 217.45
002395	11/13/2020	\$ 155.46
002396	11/13/2020	\$ 1,108.63
002397	8/10/2018	\$ 78.73
002398	11/13/2020	\$ 55.73
002399	8/10/2018	\$ 54.60
002400	8/10/2018	\$ 77.78
002401	8/10/2018	\$ 53.00
002402	11/13/2020	\$ 273.91
002403	8/10/2018	\$ 57.52
002404	8/10/2018	\$ 179.60
002405	8/10/2018	\$ 879.83
002406	8/10/2018	\$ 120.60
002407	8/10/2018	\$ 142.66
002408	11/13/2020	\$ 63.52
002409	8/10/2018	\$ 313.61
002410	11/13/2020	\$ 147.10
002411	8/10/2018	\$ 78.00
002412	8/10/2018	\$ 279.83
002413	8/10/2018	\$ 298.00
002414	8/10/2018	\$ 195.00
002415	11/13/2020	\$ 51.66
002416	8/10/2018	\$ 1,239.46
002417	11/13/2020	\$ 123.50
002418	11/13/2020	\$ 163.76
002419	8/10/2018	\$ 280.82
002420	8/10/2018	\$ 98.93
002421	8/10/2018	\$ 204.05
002422	8/10/2018	\$ 2,361.14
002423	8/10/2018	\$ 69.95
002424	8/10/2018	\$ 103.99
002425	8/10/2018	\$ 99.05
002426	8/10/2018	\$ 263.08
002427	11/13/2020	\$ 334.85
002428	8/10/2018	\$ 1,500.95

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002429	8/10/2018	\$ 96.00
002430	11/13/2020	\$ 97.01
002431	8/10/2018	\$ 1,134.19
002432	8/10/2018	\$ 826.37
002432	11/13/2020	\$ 104.68
002433	11/13/2020	\$ 170.92
002434	8/10/2018	\$ 709.78
002435	11/13/2020	\$ 1,814.75
002436	8/10/2018	\$ 340.50
002437	8/10/2018	\$ 89.45
002438	8/10/2018	\$ 122.93
002439	8/10/2018	\$ 277.92
002440	8/10/2018	\$ 111.02
002441	8/10/2018	\$ 54.98
002442	8/10/2018	\$ 94.35
002443	8/10/2018	\$ 469.68
002444	11/13/2020	\$ 60.70
002445	8/10/2018	\$ 59.99
002446	3/26/2019	\$ 784.05
002447	8/10/2018	\$ 77.99
002448	11/13/2020	\$ 73.22
002449	11/13/2020	\$ 100.91
002450	8/10/2018	\$ 938.08
002451	8/10/2018	\$ 72.88
002452	8/10/2018	\$ 128.25
002453	11/13/2020	\$ 64.75
002454	8/10/2018	\$ 156.26
002455	11/13/2020	\$ 139.55
002456	8/10/2018	\$ 105.09
002457	11/13/2020	\$ 161.45
002458	8/10/2018	\$ 152.80
002459	8/10/2018	\$ 95.16
002460	11/13/2020	\$ 181.65
002461	8/10/2018	\$ 55.30
002462	11/13/2020	\$ 650.89
002463	8/10/2018	\$ 128.00
002464	8/10/2018	\$ 92.84
002465	8/10/2018	\$ 279.92
002466	11/13/2020	\$ 66.59
002467	8/10/2018	\$ 461.63

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002468	11/13/2020	\$ 115.86
002469	11/13/2020	\$ 75.07
002470	11/13/2020	\$ 165.34
002471	8/10/2018	\$ 1,065.83
002472	11/13/2020	\$ 115.86
002473	8/10/2018	\$ 329.82
002474	8/10/2018	\$ 95.41
002475	11/13/2020	\$ 140.83
002476	8/10/2018	\$ 91.08
002477	8/10/2018	\$ 1,738.39
002478	8/10/2018	\$ 394.50
002479	11/13/2020	\$ 79.24
002480	8/10/2018	\$ 81.51
002481	8/10/2018	\$ 331.80
002482	8/10/2018	\$ 108.78
002483	8/10/2018	\$ 79.26
002484	8/10/2018	\$ 936.49
002485	8/10/2018	\$ 109.85
002486	8/10/2018	\$ 3,414.94
002487	8/10/2018	\$ 276.27
002488	8/10/2018	\$ 69.94
002489	8/10/2018	\$ 100.91
002490	11/13/2020	\$ 200.25
002491	8/10/2018	\$ 93.03
002492	8/10/2018	\$ 71.75
002492	11/13/2020	\$ 284.99
002493	8/10/2018	\$ 1,729.48
002494	11/13/2020	\$ 686.97
002495	8/10/2018	\$ 12,045.00
002496	11/13/2020	\$ 241.83
002497	11/13/2020	\$ 56.51
002498	8/10/2018	\$ 6,786.29
002499	8/10/2018	\$ 77.18
002500	11/13/2020	\$ 4,871.71
002501	8/10/2018	\$ 128.96
002502	11/13/2020	\$ 73.06
002503	8/10/2018	\$ 127.17
002504	8/10/2018	\$ 162.45
002505	8/10/2018	\$ 925.20
002506	8/10/2018	\$ 50.25

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002507	8/10/2018	\$ 214.45
002508	8/10/2018	\$ 569.03
002509	8/10/2018	\$ 671.01
002510	8/10/2018	\$ 228.52
002511	11/13/2020	\$ 94.65
002512	8/10/2018	\$ 994.70
002513	8/10/2018	\$ 74.07
002514	8/10/2018	\$ 108.16
002515	3/26/2019	\$ 8,434.10
002516	8/10/2018	\$ 161.09
002517	11/13/2020	\$ 1,132.74
002518	11/13/2020	\$ 346.67
002519	11/13/2020	\$ 188.04
002520	8/10/2018	\$ 149.38
002521	8/10/2018	\$ 203.84
002522	8/10/2018	\$ 139.09
002523	8/10/2018	\$ 62.41
002524	8/10/2018	\$ 327.70
002525	8/10/2018	\$ 93.78
002526	8/10/2018	\$ 210.06
002527	11/13/2020	\$ 62.58
002528	8/10/2018	\$ 1,920.00
002529	11/13/2020	\$ 1,011.41
002530	11/13/2020	\$ 116.27
002531	8/10/2018	\$ 77.30
002532	11/13/2020	\$ 554.74
002533	8/10/2018	\$ 298.94
002534	8/10/2018	\$ 141.70
002535	8/10/2018	\$ 72.38
002536	8/10/2018	\$ 58.13
002537	3/26/2019	\$ 156.22
002538	8/10/2018	\$ 64.41
002539	8/10/2018	\$ 66.93
002540	8/10/2018	\$ 82.32
002541	8/10/2018	\$ 431.39
002542	8/10/2018	\$ 58.07
002543	8/10/2018	\$ 68.12
002544	11/13/2020	\$ 83.07
002545	8/10/2018	\$ 227.44
002546	8/10/2018	\$ 249.51

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002547	8/10/2018	\$ 62.53
002548	8/10/2018	\$ 181.50
002549	8/10/2018	\$ 669.86
002550	8/10/2018	\$ 59.95
002551	8/10/2018	\$ 900.00
002552	8/10/2018	\$ 114.17
002553	8/10/2018	\$ 1,565.86
002554	11/13/2020	\$ 399.85
002555	8/10/2018	\$ 643.07
002555	11/13/2020	\$ 57.83
002556	8/10/2018	\$ 126.52
002557	8/10/2018	\$ 180.70
002558	11/13/2020	\$ 110.86
002559	11/13/2020	\$ 50.70
002560	8/10/2018	\$ 1,283.70
002561	8/10/2018	\$ 562.22
002562	8/10/2018	\$ 51.62
002563	8/10/2018	\$ 3,957.79
002564	11/13/2020	\$ 64.59
002565	11/13/2020	\$ 649.13
002566	8/10/2018	\$ 1,304.40
002567	8/10/2018	\$ 679.30
002568	8/10/2018	\$ 108.64
002569	8/10/2018	\$ 68.43
002570	8/10/2018	\$ 986.04
002571	8/10/2018	\$ 120.90
002572	8/10/2018	\$ 51.83
002573	8/10/2018	\$ 623.59
002573	11/13/2020	\$ 529.66
002574	8/10/2018	\$ 152.10
002575	8/10/2018	\$ 6,150.10
002576	8/10/2018	\$ 66.00
002577	11/13/2020	\$ 303.91
002578	8/10/2018	\$ 93.59
002579	8/10/2018	\$ 76.59
002580	3/26/2019	\$ 164.98
002581	11/13/2020	\$ 240.32
002582	8/10/2018	\$ 156.06
002583	8/10/2018	\$ 145.47
002584	8/10/2018	\$ 74.50

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002585	8/10/2018	\$ 89.86
002586	8/10/2018	\$ 62.80
002587	8/10/2018	\$ 188.96
002588	11/13/2020	\$ 62.57
002589	8/10/2018	\$ 408.13
002590	8/10/2018	\$ 152.48
002591	11/13/2020	\$ 80.44
002592	11/13/2020	\$ 251.51
002593	8/10/2018	\$ 970.52
002594	11/13/2020	\$ 466.29
002595	8/10/2018	\$ 68.00
002596	11/13/2020	\$ 727.16
002597	11/13/2020	\$ 1,629.78
002598	8/10/2018	\$ 83.07
002599	8/10/2018	\$ 345.96
002600	8/10/2018	\$ 219.58
002601	8/10/2018	\$ 300.71
002602	8/10/2018	\$ 96.45
002603	8/10/2018	\$ 8,837.60
002604	8/10/2018	\$ 131.01
002605	8/10/2018	\$ 384.00
002606	8/10/2018	\$ 193.00
002607	8/10/2018	\$ 52.06
002608	11/13/2020	\$ 114.46
002609	11/13/2020	\$ 68.40
002610	3/26/2019	\$ 258.77
002611	8/10/2018	\$ 98.99
002612	11/13/2020	\$ 70.06
002613	8/10/2018	\$ 149.44
002614	8/10/2018	\$ 53.33
002615	8/10/2018	\$ 52.75
002616	8/10/2018	\$ 62.39
002617	8/10/2018	\$ 85.60
002618	11/13/2020	\$ 63.48
002619	11/13/2020	\$ 307.55
002620	8/10/2018	\$ 149.99
002621	8/10/2018	\$ 70.38
002622	3/26/2019	\$ 982.25
002623	11/13/2020	\$ 589.54
002624	11/13/2020	\$ 223.47

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002625	11/13/2020	\$ 956.32
002626	8/10/2018	\$ 622.75
002627	8/10/2018	\$ 132.25
002628	8/10/2018	\$ 68.98
002629	8/10/2018	\$ 659.36
002630	8/10/2018	\$ 82.00
002631	8/10/2018	\$ 3,276.02
002632	11/13/2020	\$ 784.11
002633	11/13/2020	\$ 671.23
002634	11/13/2020	\$ 801.69
002635	8/10/2018	\$ 168.59
002636	8/10/2018	\$ 119.40
002637	11/13/2020	\$ 116.81
002638	11/13/2020	\$ 420.13
002639	3/26/2019	\$ 112.17
002640	8/10/2018	\$ 81.77
002641	8/10/2018	\$ 139.65
002642	8/10/2018	\$ 908.88
002643	11/13/2020	\$ 67.49
002644	3/26/2019	\$ 891.55
002645	11/13/2020	\$ 206.67
002646	11/13/2020	\$ 106.62
002647	8/10/2018	\$ 149.51
002648	11/13/2020	\$ 85.66
002649	8/10/2018	\$ 60.71
002650	8/10/2018	\$ 233.58
002651	11/13/2020	\$ 98.40
002652	11/13/2020	\$ 527.25
002653	8/10/2018	\$ 421.59
002654	8/10/2018	\$ 77.83
002655	8/10/2018	\$ 126.14
002656	8/10/2018	\$ 127.89
002657	8/10/2018	\$ 157.60
002658	8/10/2018	\$ 170.55
002659	3/26/2019	\$ 50.55
002660	11/13/2020	\$ 178.57
002661	11/13/2020	\$ 150.41
002662	8/10/2018	\$ 121.60
002663	11/13/2020	\$ 90.82
002664	8/10/2018	\$ 462.00

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002665	8/10/2018	\$ 170.14
002666	11/13/2020	\$ 58.98
002667	8/10/2018	\$ 2,821.81
002668	8/10/2018	\$ 297.17
002669	8/10/2018	\$ 159.53
002670	8/10/2018	\$ 1,126.90
002671	11/13/2020	\$ 157.55
002672	8/10/2018	\$ 96.54
002673	8/10/2018	\$ 69.70
002674	3/26/2019	\$ 138.43
002675	11/13/2020	\$ 124.43
002676	8/10/2018	\$ 264.50
002677	8/10/2018	\$ 612.81
002678	8/10/2018	\$ 318.05
002679	8/10/2018	\$ 136.63
002680	11/13/2020	\$ 297.48
002681	8/10/2018	\$ 102.38
002682	8/10/2018	\$ 121.80
002683	11/13/2020	\$ 79.13
002684	11/13/2020	\$ 162.55
002685	8/10/2018	\$ 145.14
002686	8/10/2018	\$ 76.72
002687	11/13/2020	\$ 738.55
002688	8/10/2018	\$ 352.27
002689	11/13/2020	\$ 51.27
002690	8/10/2018	\$ 208.33
002691	8/10/2018	\$ 111.89
002692	8/10/2018	\$ 572.82
002693	11/13/2020	\$ 87.34
002694	11/13/2020	\$ 67.56
002695	8/10/2018	\$ 294.98
002696	11/13/2020	\$ 221.33
002697	8/10/2018	\$ 120.00
002698	8/10/2018	\$ 53.60
002699	3/26/2019	\$ 148.95
002700	8/10/2018	\$ 73.73
002701	8/10/2018	\$ 219.15
002702	8/10/2018	\$ 110.49
002703	11/13/2020	\$ 966.45
002704	8/10/2018	\$ 91.08

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002705	11/13/2020	\$ 648.94
002706	11/13/2020	\$ 52.13
002707	11/13/2020	\$ 254.14
002708	8/10/2018	\$ 127.49
002709	8/10/2018	\$ 874.48
002710	8/10/2018	\$ 1,183.17
002711	11/13/2020	\$ 54.83
002712	8/10/2018	\$ 124.00
002713	8/10/2018	\$ 72.40
002714	8/10/2018	\$ 78.67
002715	8/10/2018	\$ 115.00
002716	8/10/2018	\$ 886.10
002717	8/10/2018	\$ 159.66
002718	11/13/2020	\$ 175.84
002719	11/13/2020	\$ 81.52
002720	3/26/2019	\$ 579.34
002721	11/13/2020	\$ 162.49
002722	8/10/2018	\$ 146.90
002723	11/13/2020	\$ 99.36
002724	8/10/2018	\$ 584.50
002725	8/10/2018	\$ 143.00
002726	8/10/2018	\$ 61.72
002727	3/26/2019	\$ 717.45
002728	8/10/2018	\$ 133.84
002729	8/10/2018	\$ 1,521.31
002730	11/13/2020	\$ 61.25
002731	11/13/2020	\$ 101.75
002732	11/13/2020	\$ 328.97
002733	8/10/2018	\$ 82.00
002733	11/13/2020	\$ 666.75
002734	8/10/2018	\$ 161.13
002735	8/10/2018	\$ 57.20
002736	3/26/2019	\$ 55.63
002737	11/13/2020	\$ 221.60
002738	8/10/2018	\$ 120.72
002739	8/10/2018	\$ 1,883.67
002740	11/13/2020	\$ 100.21
002741	8/10/2018	\$ 312.77
002742	11/13/2020	\$ 403.56
002743	11/13/2020	\$ 2,791.23

Attachment A**Schedule 2**

Customer	Erroneous Margin Notification Date	Restitution
002744	11/13/2020	\$ 127.33
002745	8/10/2018	\$ 294.40
002746	11/13/2020	\$ 127.23
002747	8/10/2018	\$ 363.95
002748	8/10/2018	\$ 106.49
002749	8/10/2018	\$ 57.90
002750	8/10/2018	\$ 109.17
002751	11/13/2020	\$ 85.59
002752	11/13/2020	\$ 61.84
002753	3/26/2019	\$ 141.68
002754	11/13/2020	\$ 51.58
002755	11/13/2020	\$ 82.23
002756	8/10/2018	\$ 218.90
002757	11/13/2020	\$ 134.54
002758	11/13/2020	\$ 67.83
002759	11/13/2020	\$ 52.08
002760	11/13/2020	\$ 161.63
002761	8/10/2018	\$ 412.41
002762	11/13/2020	\$ 62.82
002763	11/13/2020	\$ 149.33
002764	11/13/2020	\$ 10,282.06
002765	11/13/2020	\$ 3,420.00
002766	11/13/2020	\$ 74.96
002767	11/13/2020	\$ 66.10
002768	11/13/2020	\$ 161.21
002769	11/13/2020	\$ 306.55
002770	11/13/2020	\$ 67.90
002771	11/13/2020	\$ 173.63
002772	11/13/2020	\$ 310.10
002773	3/26/2019	\$ 331.36
002774	11/13/2020	\$ 244.63
002775	3/26/2019	\$ 636.84
002776	11/13/2020	\$ 103.34
002777	3/26/2019	\$ 225.61
002778	11/13/2020	\$ 171.87
002779	11/13/2020	\$ 696.06
002780	11/13/2020	\$ 184.80
002781	3/26/2019	\$ 50.79
002782	3/26/2019	\$ 1,080.48
002783	11/13/2020	\$ 273.68

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002784	11/13/2020	\$ 283.87
002785	11/13/2020	\$ 182.87
002786	11/13/2020	\$ 1,031.32
002787	11/13/2020	\$ 203.22
002788	11/13/2020	\$ 157.99
002789	11/13/2020	\$ 114.27
002790	11/13/2020	\$ 51.16
002791	11/13/2020	\$ 133.51
002792	3/26/2019	\$ 313.56
002793	11/13/2020	\$ 684.10
002794	11/13/2020	\$ 51.51
002795	11/13/2020	\$ 213.85
002796	3/26/2019	\$ 4,900.23
002797	11/13/2020	\$ 243.90
002798	11/13/2020	\$ 243.18
002799	3/26/2019	\$ 7,744.90
002800	11/13/2020	\$ 79.75
002801	11/13/2020	\$ 471.54
002802	11/13/2020	\$ 101.74
002803	11/13/2020	\$ 183.51
002804	11/13/2020	\$ 111.15
002805	3/26/2019	\$ 126.11
002806	11/13/2020	\$ 970.37
002807	11/13/2020	\$ 58.13
002808	11/13/2020	\$ 147.06
002809	11/13/2020	\$ 9,518.25
002810	11/13/2020	\$ 208.57
002811	11/13/2020	\$ 113.92
002812	11/13/2020	\$ 117.43
002813	11/13/2020	\$ 121.57
002814	11/13/2020	\$ 88.55
002815	11/13/2020	\$ 81.35
002816	11/13/2020	\$ 54.22
002817	3/26/2019	\$ 51.30
002818	3/26/2019	\$ 403.24
002819	3/26/2019	\$ 702.06
002820	3/26/2019	\$ 59.32
002821	3/26/2019	\$ 206.85
002822	3/26/2019	\$ 63.07
002823	3/26/2019	\$ 214.32

Attachment A

Schedule 2

Customer	Erroneous Margin Notification Date	Restitution
002824	3/26/2019	\$ 201.31
002825	3/26/2019	\$ 142.88
002826	3/26/2019	\$ 90.81
002827	3/26/2019	\$ 53.60
002828	3/26/2019	\$ 115.11
002829	3/26/2019	\$ 98.59
002830	3/26/2019	\$ 123.10
002831	3/26/2019	\$ 199.67
002832	3/26/2019	\$ 115.32
Total Restitution		\$1,653,366.51

CORRECTIVE ACTION STATEMENT

In connection with the issuance of the Letter of Acceptance, Waiver and Consent No. 2020066971201 (“AWC”), Robinhood Financial LLC (“RHF,” the “Firm,” or the “Respondent”) submits this statement describing certain of the actions it has taken with respect to the issues described in the AWC.¹

As described below, the Firm and its parent company, Robinhood Markets, Inc. (collectively “Robinhood”), have undertaken numerous remedial measures since early 2020, including the restructuring and enhancement of its legal, compliance, and anti-fraud functions; strengthening of its supervisory structure and written supervisory procedures, including with respect to supervision of technology; expansion of customer support, including with respect to options and margin trading; remediation of certain customer communications and data displays at issue in the AWC; and improved supervision of options trading.

- **Enhanced Robinhood’s legal, compliance, risk, and anti-fraud functions:** During the past year, Robinhood has hired highly experienced lawyers, including a new Chief Legal Officer, compliance officers, including two new CCOs, and new heads of financial crimes and enterprise risk and audit. Robinhood continues to grow and enhance its legal, compliance, and risk functions and programs, and has hired dozens of experienced professionals in the past year alone.
- **Strengthened Robinhood’s supervisory structure:** Robinhood has made significant improvements to its supervisory structure, including its systems and written supervisory procedures for supervising technology and its engineering infrastructure. Robinhood has taken steps to address the root causes of the March 2020 outages, reduce the risk of future outages, and increase the resilience of relevant systems, including by increasing system redundancy, better distributing load on its systems, and deploying a risk-based testing system. The Firm also has created a Board of Managers, comprised of registered principals, with designated supervisory responsibilities over, among other areas, products and technology. The Board of Managers is assisted and advised by a Product Review Committee and a Risk and Operating Committee, which review product and technology changes. The committees are comprised of Board members and senior executives with subject matter expertise. Robinhood also has updated its Business Continuity Plans.
- **Remediated customer communications and data displays:** Robinhood has added customer disclosures with respect to the use of margin, and has corrected former inaccuracies in the display of buying power, cash balances (including negative cash balances), historical performance figures, and customer communications regarding the risk of loss in debit spread

¹ This Corrective Action Statement is submitted by the Respondent. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA, or its staff.

transactions. Robinhood has also provided customers with additional educational resources.

- **Expanded customer support:** Additionally, Robinhood has substantially expanded and enhanced its customer support resources and services, including services provided to options and margin customers. Robinhood has hired hundreds of new customer support team members, including over 600 registered representatives, in its recently opened customer support sites in Westlake, Texas, and Tempe, Arizona, as well as existing locations in Denver, Colorado, and Lake Mary, Florida. Robinhood has also recently announced new customer support sites that will be opened in Charlotte, North Carolina and Chicago, Illinois. Robinhood now has a total of approximately 2,700 customer support staff, more than triple the number that it had in March 2020. Robinhood also now enables certain customers to request live support by phone. Via their app, customers may now seek phone support and speak with a registered representative for issues involving options (24 hours a day, five days a week), fraud, and banking issues, as well as issues involving trading or ACH restrictions. Robinhood is working on further expanding the circumstances in which customers may receive live phone support.
- **Improved supervision of options:** In September 2020, Robinhood implemented more rigorous criteria for customers' eligibility for options trading and has continued to improve its options approval process. Robinhood also augmented its supervision of options trading by implementing systematic monitoring of options customers to confirm their ongoing eligibility for options trading. Since April 2020, Robinhood has conducted monthly account reviews and downgraded options accounts that no longer meet the eligibility criteria. Robinhood's recently-enhanced written supervisory procedures also require systematic, documented reviews by a designated supervisor of a sample of approved customer applications requesting options, margin, and/or cash management functionality. Designated supervisors must also regularly review the account approval processes for options, Instant, and margin accounts, verifying that the methodology applied reasonably establishes controls to ensure compliance with the policy and relevant rules.