

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

DEPARTMENT OF MARKET REGULATION,

Complainant,

v.

GLOBAL ARENA CAPITAL CORP
(CRD No. 16871),

Respondent.

Disciplinary Proceeding
No. 20110265443-01

Hearing Officer—MC

DEFAULT DECISION

December 7, 2015

Respondent Global Arena Capital Corp charged customers unfair and unreasonable prices and excessive markups. The Firm also failed to establish, maintain, and enforce a supervisory system reasonably designed to achieve compliance with applicable securities laws, and FINRA and NASD rules, regarding fair pricing of corporate bond transactions and markups and markdowns. For these violations, Respondent is expelled, fined \$1 million, and ordered to disgorge to FINRA \$333,083.26, plus interest.

Appearances

Gary E. Jackson, Esquire, for the Department of Market Regulation.

No appearance by or for Respondent Global Arena Capital Corp.

DECISION

I. Introduction

Global Arena Capital Corp (“Global Arena” or the “Firm”) bought and sold corporate bonds from other broker-dealers to sell to its retail customers, charging them markups on the bonds. It also bought bonds from its retail customers and sold them to other broker-dealers, charging the customers markdowns. The transactions at issue were riskless principal transactions, involving purchases and sales of the same bonds on the same day with Global Arena customers on one or both sides of the transactions.

The Complaint contains two causes of action. The first charges Global Arena with charging unfair and unreasonable prices and excessive markups, in violation of NASD Rules

2440, IM-2440-1, and IM-2440-2, and FINRA Rule 2010.¹ The second charges the Firm with failing to establish, maintain, and enforce a supervisory system reasonably designed to ensure compliance with securities laws and regulations relating to fair pricing and markup and markdown practices for corporate bonds, in violation of NASD Rule 3010 and FINRA Rule 2010.

Market Regulation filed and served the Complaint in accordance with FINRA Rules. Global Arena failed to file an Answer or respond to the Complaint. Accordingly, Market Regulation filed a motion for entry of default decision (“Default Motion”) together with counsel’s declaration (“Decl.”) and three exhibits supporting the motion. Global Arena did not respond to the Default Motion.

By failing to file an Answer to the Complaint, Global Arena has defaulted. Accordingly, for the reasons set forth below, the Default Motion is granted.

II. Findings of Fact and Conclusions of Law

A. The Firm’s Background

Global Arena first became registered as a FINRA member firm in February 1986. The Firm filed a Form BDW seeking to withdraw from FINRA registration in June 2015. FINRA terminated Global Arena’s registration for failure to pay registration fees in July 2015.²

B. Jurisdiction

Global Arena was registered with FINRA from February 1986 until July 20, 2015, when FINRA canceled the Firm’s membership.³ The Firm remains subject to FINRA’s jurisdiction because it was a FINRA member when the alleged misconduct occurred and when Market Regulation filed the Complaint.⁴

C. Origin of the Investigation

This investigation originated from an alert sweep generated by Market Regulation’s Fixed Income Investigations Group, which conducted an investigation of possible fair pricing

¹ FINRA Rule 2121 (“Fair Prices and Commissions”) superseded NASD Rule 2440, IM-2440-1, and IM-2440-2 (“Mark Up Policy”) effective on May 9, 2014. (See Rule Conversion Chart: NASD to FINRA (<http://www.finra.org/ruleconversionchart/>). This Decision refers to and relies on the FINRA and NASD Conduct Rules that were in effect at the time of the alleged misconduct. The applicable rules are available at <http://www.finra.org/industry/finra-rules>.

² Decl. ¶ 5; Complainant’s Exhibit (“CX”) 1

³ Decl. ¶ 5; CX-1.

⁴ Article IV, Section 6, FINRA’s By-Laws, <http://finra.complinet.com>.

violations in sales and purchases of corporate bonds by Global Arena from October 1, 2010, to June 30, 2013.⁵

D. Global Arena's Default

Market Regulation filed and served the Complaint with the Notice of Complaint and again with a Second Notice of Complaint on Global Arena by certified mail at its address listed in the Central Registration Depository ("CRD address"). Market Regulation received a return receipt for the certified mailing of the first Notice of Complaint, and a tracking record from the courier service confirming service of both Notices of Complaint.⁶ However, Global Arena failed to file an Answer or respond to the Complaint.

Consequently, Market Regulation filed the Default Motion supported by counsel's Declaration and three exhibits. Global Arena did not respond to the Default Motion.

By serving the Complaint and Notices of Complaint on Global Arena at its CRD address, Market Regulation met the requirements of service under FINRA Rule 9134. By failing to file an Answer to the Complaint, Global Arena has defaulted.⁷ Thus, the Default Motion is granted.

E. Global Arena Violated NASD Rules 2440, IM-2440-1, and IM-2440-2, and FINRA Rule 2010

1. The Pricing Rules

NASD Rule 2440 requires a member who sells or buys a security, to or from a customer, to do so "at a price which is fair, taking into consideration all relevant circumstances." The relevant circumstances enumerated by the Rule include market conditions related to the security; the expense involved in executing the transaction; and the value of the member's service to the customer based on the member's experience and knowledge of the security, with consideration of the right of the member to profit. NASD IM-2440-1, applicable to debt securities, explicitly prohibits a member from charging a price "not reasonably related to the current market price of the security" or "a commission which is not reasonable." NASD IM-2440-2 provides additional guidance on the factors that should be considered in determining the prevailing market price, and states that prevailing market price is determined with reference to the contemporaneous cost incurred, or proceeds obtained.

⁵ Default Motion at 2; Decl. ¶ 2.

⁶ Decl. at 3, ¶¶ 6-8; CX-3, at 1, 3.

⁷ Global Arena is notified that it may move to set aside the default pursuant to FINRA Rule 9269(c) upon a showing of good cause.

2. Global Arena's Conduct

Market Regulation staff conducted a review of Global Arena's pricing practices for corporate bonds for the review period. The staff's investigation focused on determining whether the Firm's markups and markdowns for corporate bond transactions were fair to customers, and whether the Firm properly supervised the pricing of corporate bond transactions.⁸ Market Regulation reviewed trade reports and records of 495 transactions and conducted on-the-record interviews of Global Arena employees to examine the markups and markdowns it charged, and Global Arena's supervision of its corporate bond transactions.⁹ Market Regulation staff compared markups and markdowns charged by other FINRA member firms in similar transactions in the same bonds and concluded that Global Arena charged substantially more than other broker dealers for the bonds in the same time period. The investigation revealed no justifications for the higher markups and markdowns Global Arena charged its customers.¹⁰

Market Regulation staff concluded that Global Arena charged customers unfair and excessive prices in 495 corporate bond transactions, ranging from 3.01 percent to 13.86 percent.¹¹ In most instances the markups and markdowns were at least 33 percent more than the next highest charged by other members in similar transactions¹² for similar corporate bond transactions within a month before or after the transactions at issue here.¹³

Taking into consideration all relevant circumstances, these charges were not fair and not reasonably related to the then-current market price of the security, and the prevailing market price was not determined with reference to the contemporaneous cost incurred, or the proceeds obtained. On the record of this case, I conclude that Global Arena violated NASD Rules 2440, IM-2440-1, and IM-2440-2, and FINRA Rule 2010.

F. Global Arena Violated NASD Rule 3010 and FINRA Rule 2010

1. The Supervision Rule

NASD Rule 3010 requires members to establish, maintain, and enforce a supervisory system, including written supervisory procedures, reasonably designed to achieve compliance with applicable securities laws and FINRA rules requiring them to charge fair prices and conform to FINRA's policies, defined in NASD Rule 2440, IM-2440-1, and IM-2440-2, in the markups and markdowns they charge for securities transactions.

⁸ Decl. ¶¶ 2-3.

⁹ Compl. Exhibit A; Decl. ¶ 11.

¹⁰ Default Motion at 8.

¹¹ Decl. ¶ 9.

¹² Decl. at 4, n.2.

¹³ Decl. ¶ 9.

2. Global Arena's Conduct

Market Regulation's investigation revealed that Global Arena failed to establish, maintain, and implement a supervisory system, including written supervisory procedures reasonably designed to achieve compliance with the applicable rules requiring it to provide its customers with reasonable prices, and failed to supervise the markups and markdowns its registered representatives and associated persons charged.¹⁴ Global Arena's written procedures did not contain reasonable measures to guide the Firm's registered representatives to conform their practices in pricing bonds and setting markups and markdowns to the requirements set forth in the factors prescribed by NASD IM-2440-1. As a result, Global Arena supervisors did not take them into consideration when reviewing the Firm's bond transactions.¹⁵

These facts establish that Global Arena violated NASD Rule 3010 and FINRA Rule 2010.

III. Sanctions

A. Pricing Violations

FINRA's Sanction Guidelines for charging excessive markups or markdowns recommend a fine from \$5,000 to \$146,000, plus the gross amount of the excessive markups and markdowns, if restitution is not ordered. In egregious cases, the Guidelines recommend considering suspension for up to two years or expulsion.¹⁶

Market Regulation characterizes Global Arena's misconduct as egregious, with the pricing violations constituting a "systemic pattern," and the Firm's supervision system suffering from systemic supervisory failures.¹⁷ Market Regulation lists numerous aggravating factors: the intentionality of the misconduct; monetary loss to customers; failure to accept responsibility or implement supervisory procedures to prevent further similar violations; and Global Arena's profit from its misconduct.¹⁸ For these reasons, Market Regulation seeks an order expelling Global Arena from FINRA membership, imposing a fine of at least \$1 million, and an order of restitution of \$333,083 plus interest.¹⁹

¹⁴ Compl. ¶ 14; Decl. ¶¶ 10-11.

¹⁵ Compl. ¶¶ 15-18.

¹⁶ FINRA Sanction Guidelines at 90 (2015), <http://www.finra.org/industry/sanction-guidelines> ("Guidelines"). The current Guidelines, issued in March 2015, supersede prior versions. They apply to all disciplinary matters, including matters pending when the current Guidelines were issued, such as this one. *Id.* at 8.

¹⁷ Default Motion at 11.

¹⁸ *Id.* at 11-12.

¹⁹ *Id.* at 11.

The record does not disclose how many representatives were involved in the unfair pricing practices or what percentage of Global Arena's bond transactions were unfairly priced; therefore there is an insufficient evidentiary basis to determine whether the misconduct was intentional or reckless. Nonetheless, there are a number of aggravating factors.

The aggravating factors include the following: Global Arena has not accepted responsibility or acknowledged its misconduct;²⁰ at the time of the violations, Global Arena had not developed and implemented reasonable supervisory procedures;²¹ the pricing violations involved numerous acts constituting a pattern of misconduct occurring over an extended period;²² Global Arena caused injury to its customers;²³ Global Arena's misconduct resulted in financial gain for the Firm;²⁴ and the number of excessive markups and markdowns is large.²⁵

There are no mitigating factors.

For these reasons, I conclude that Global Arena's pricing violations were egregious and that expulsion of the Firm is the appropriate sanction.

As for Market Regulation's request for an order of restitution and imposition of a large fine, the Guidelines do not directly address the imposition of monetary sanctions upon firms that are expelled from FINRA, but they do discuss imposition of monetary sanctions upon individuals who are barred. The Guidelines state that "Adjudicators generally should not impose a fine if an individual is barred and the Adjudicator has ordered restitution or disgorgement of ill-gotten gains as appropriate to remediate the misconduct" in cases involving certain types of misconduct, including sales practice violations, which include pricing violations.²⁶ However, the Guidelines go on to state that "Adjudicators generally should impose a fine and require payment of restitution and disgorgement even if an individual is barred in all sales practices cases" that involve "widespread, significant and identifiable customer harm; or the respondent has retained substantial ill-gotten gains."²⁷

²⁰ Guidelines at 6 (Principal Consideration No. 2).

²¹ *Id.* (Principal Consideration No. 5).

²² *Id.* (Principal Considerations No. 8, 9).

²³ *Id.* (Principal Consideration No. 11).

²⁴ *Id.* at 7 (Principal Consideration No. 17).

²⁵ *Id.* (Principal Consideration No. 18).

²⁶ *Id.* at 10.

²⁷ *Id.*

The record suggests this case is “more suitable for a disgorgement analysis” than for a restitution analysis.²⁸ The record does not provide a sufficient basis for determining an amount of restitution that would make Global Arena’s customers whole under the circumstances of this case.²⁹ Rather, the record establishes a reasonable approximation of the profits Global Arena obtained improperly from its pricing violations, which is sufficient to support an order of disgorgement of the financial benefits to the Firm. Therefore, I find it appropriate to order Global Arena to disgorge \$333,083.26, the total excess markups and markdowns identified in Exhibit A of the Complaint, plus interest, to FINRA.³⁰

B. Supervision

For failing to supervise, the Guidelines recommend imposition of a fine between \$5,000 and \$73,000. In egregious cases involving systemic failures of supervision, the Guidelines recommend considering a suspension of up to two years or expulsion.³¹

Global Arena’s supervision failures relating to corporate bond pricing were systemic. The record establishes that Global Arena failed to create and implement a supervisory system reasonably designed to achieve compliance with FINRA rules requiring it to charge fair prices and not to charge excessive markups and markdowns and, as a result, that Global Arena supervisors did not take into consideration the factors they were required to consider by NASD Rule 2440, IM-2440-1, and IM-2440-2 in reviewing the prices charged by registered representatives for corporate bond transactions. However, in light of the sanctions imposed for the pricing violations, and because of the nexus between Global Arena’s supervisory failures and

²⁸ *Dep’t of Enforcement v. Smith*, No. 20111029152401, 2014 FINRA Discip. LEXIS 2, at *23-24 (NAC Feb. 21, 2014); *Dep’t of Mkt. Regulation v. Lane*, No. 20080082049, 2013 FINRA Discip. LEXIS 34, at *87-88 (NAC Dec. 26, 2013), citing *Dep’t of Enforcement v. Evans*, No. 2006005977901, 2011 FINRA Discip. LEXIS 36, *40 n.42 (NAC Oct. 3, 2011); *Laurie Jones Canady*, 54 S.E.C. 65, 84 (1999) (orders for disgorgement may be based on only a reasonable approximation of a respondent’s improper profits).

²⁹ The purpose of restitution is to restore to identifiable victims a quantifiable loss proximately caused by a respondent’s misconduct. To order restitution, adjudicators must calculate the actual amount of loss suffered by a customer as demonstrated by the evidence, and must include a description of the adjudicator’s calculation. Guidelines at 4, General Principle No. 5. As noted above, Market Regulation staff’s investigation conducted an investigation comparing markups and markdowns charged by Global Arena to those of other FINRA member firms in similar transactions in the same bonds to conclude that “Global Arena charged substantially more” than other firms. Default Motion at 8-9. Although Market Regulation notes that Global Arena did not dispute the staff’s calculations, and the calculations support the staff’s conclusion that Global Arena’s markups and markdowns were excessive, there is no way to determine the specific price each customer should have been charged to calculate the amount of restitution required to make the customer “whole.”

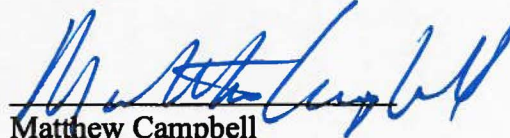
³⁰ Prejudgment interest is appropriate in a disgorgement order to avoid essentially providing a respondent with an interest-free loan pending the final order. *Smith*, 2014 FINRA Discip. LEXIS 2, at *25 n.23. Interest shall run from the dates of the transactions identified in Exhibit A, calculated at the rate established for the underpayment of federal income tax in Section 6621 of the Internal Revenue Code, 26 U.S.C. Section 6621(a)(2).

³¹ Guidelines at 103.

the pricing violations, it is unnecessary to impose additional, separate sanctions for the supervision violations.

IV. Order

Respondent Global Arena Capital Corp is expelled, fined \$1 million, and ordered to disgorge to FINRA \$333,083.26, plus interest, for charging customers unfair and unreasonable prices and excessive markups, in violation of NASD Rules 2440, IM-2440-1, IM-2440-2, and FINRA Rule 2010; and failing to establish, maintain, and enforce a supervisory system reasonably designed to achieve compliance with applicable securities laws and FINRA and NASD rules regarding fair pricing of corporate bond transactions and markups and markdowns, in violation of NASD Rule 3010 and FINRA Rule 2010.


Matthew Campbell
Hearing Officer

Copies to:

Global Arena Capital Corp, c/o Barbara Desiderio (via first-class mail)
Gary E. Jackson, Esq. (via email and first-class mail)
Robert A. Marchman, Esq. (via email)
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James J. Nixon, Esq. (via email)

Global Arena Capital Corp. ("GACC")
 FINRA Matter No. 20110265443 (20130382569)
 Exhibit A

Ex A #	Trade Date 1	Trade Time 1	Qty. 1	Contra 1	Trade Price 1	Symbol	CUSIP	Firm	Trade Date 2	Trade Time 2	Qty. 2	Contra 2	Trade Price 2	Markup / Markdown	Restitution Amount Owed to Customer
1	11/19/2010	13:28:00	16.0	BD(S)	86.250	BYD.GK	09889RAA7	GACC	11/19/2010	12:34:19	16.0	C(B)	88.800	4.164%	\$ 115.15
2	12/08/2010	15:45:12	50	BD(S)	63.500	DEXM.AA	25212WAA8	GACC	12/08/2010	15:55:10	50	C(B)	66.000	3.94%	\$ 307.02
3	12/15/2010	14:32:00	50	BD(S)	68.250	DEXM.AA	25212WAA8	GACC	12/15/2010	14:37:02	50	C(B)	71.000	4.03%	\$ 361.49
4	12/15/2010	14:48:00	27	BD(S)	68.250	DEXM.AA	25212WAA8	GACC	12/15/2010	14:57:15	27	C(B)	71.000	4.03%	\$ 195.20
5	12/15/2010	15:23:00	80	BD(S)	68.250	DEXM.AA	25212WAA8	GACC	12/15/2010	15:38:11	80	C(B)	71.000	4.03%	\$ 578.38
6	12/15/2010	15:23:00	50	BD(S)	68.250	DEXM.AA	25212WAA8	GACC	12/15/2010	15:42:09	50	C(B)	71.250	4.40%	\$ 486.49
7	12/16/2010	10:34:00	19	BD(S)	70.000	DEXM.AA	25212WAA8	GACC	12/16/2010	10:39:54	19	C(B)	72.750	3.93%	\$ 122.50
8	12/16/2010	13:10:03	19	BD(S)	68.500	DEXM.AA	25212WAA8	GACC	12/16/2010	13:12:38	19	C(B)	71.250	4.01%	\$ 122.50
9	12/22/2010	12:28:21	100	BD(S)	69.500	DEXM.AA	25212WAA8	GACC	12/22/2010	12:35:59	100	C(B)	72.250	3.98%	\$ 671.95
10	11/24/2010	14:39:20	33	BD(S)	79.125	EIX.IC	281023AR2	GACC	11/24/2010	14:40:38	33	C(B)	84.475	6.76%	\$ 744.55
11	11/24/2010	14:31:00	33	BD(S)	79.125	FDC.HN	319963AV6	GACC	11/24/2010	14:40:38	33	C(B)	84.475	6.76%	\$ 616.60
12	12/22/2010	13:51:00	20	BD(S)	84.500	SNA.GE	87161CAG0	GACC	12/22/2010	13:58:35	20	C(B)	87.750	3.85%	\$ 250.00
13	12/22/2010	14:14:00	15	BD(S)	84.500	SNA.GE	87161CAG0	GACC	12/22/2010	14:24:21	15	C(B)	87.750	3.85%	\$ 87.50
14	11/16/2010	16:30:00	80	BD(S)	94.500	SPWR.GC	867652AC3	GACC	11/16/2010	10:55:00	80	C(B)	98.250	3.97%	\$ 1,321.68
15	11/23/2010	14:01:00	150	BD(S)	89.750	SPWR.GC	867652AC3	GACC	11/23/2010	14:01:56	150	C(B)	93.250	3.90%	\$ 2,261.32
16	11/23/2010	14:01:00	25	BD(S)	89.750	SPWR.GC	867652AC3	GACC	11/23/2010	14:04:20	25	C(B)	93.500	4.18%	\$ 537.50
17	11/23/2010	14:01:00	100	BD(S)	89.750	SPWR.GC	867652AC3	GACC	11/23/2010	14:05:29	100	C(B)	93.500	4.18%	\$ 1,757.55
18	11/23/2010	14:02:00	25	BD(S)	89.750	SPWR.GC	867652AC3	GACC	11/23/2010	14:03:20	25	C(B)	93.500	4.18%	\$ 537.50
19	12/06/2010	10:32:30	400	BD(S)	91.250	SPWR.GC	867652AC3	GACC	12/06/2010	10:33:54	400	C(B)	95.000	4.11%	\$ 6,897.00
20	12/06/2010	10:53:01	155	BD(S)	91.250	SPWR.GC	867652AC3	GACC	12/06/2010	10:53:59	155	C(B)	95.000	4.11%	\$ 2,672.59
	11/16/2010	13:26:00	625	BD(S)	93.850	SPWR.GC	867652AC3	GACC	11/16/2010						
	11/16/2010				93.850	SPWR.GC	867652AC3	GACC	11/16/2010	13:29:00	250	C(B)	97.600	4.00%	\$ 4,166.32
	11/16/2010				93.850	SPWR.GC	867652AC3	GACC	11/16/2010	13:29:00	50	C(B)	97.600	4.00%	\$ 1,475.00
21	11/16/2010				93.850	SPWR.GC	867652AC3	GACC	11/16/2010	13:29:00	25	C(B)	97.600	4.00%	\$ 537.50
	11/16/2010				93.850	SPWR.GC	867652AC3	GACC	11/16/2010	13:29:00	50	C(B)	97.600	4.00%	\$ 1,475.00
	11/16/2010				93.850	SPWR.GC	867652AC3	GACC	11/16/2010	13:29:00	150	C(B)	97.100	3.46%	\$ 1,749.79
	11/16/2010				93.850	SPWR.GC	867652AC3	GACC	11/16/2010	13:29:00	100	C(B)	97.100	3.46%	\$ 1,166.53
22	12/29/2010	9:37:00	20	BD(S)	88.625	FDC.HN	319963AV6	GACC	12/29/2010	9:47:17	20	C(B)	91.875	3.67%	\$ 132.43
23	11/24/2010	12:56:00	20	BD(S)	77.750	MBL.GF	56262CAH3	GACC	11/24/2010	12:55:45	20	C(B)	80.300	3.28%	\$ 110.00
24	12/17/2010	15:23:19	20	BD(S)	81.000	SNA.GE	87161CAG0	GACC	12/17/2010	15:42:41	20	C(B)	84.000	3.70%	\$ 200.00
25	11/12/2010	13:15:00	50	BD(S)	94.750	SPWR.GC	867652AC3	GACC	11/12/2010	13:40:00	50	C(B)	96.000	3.43%	\$ 1,225.00
26	11/15/2010	12:14:00	200	BD(S)	94.500	SPWR.GC	867652AC3	GACC	11/15/2010	12:08:00	200	C(B)	97.500	3.17%	\$ 1,804.20
27	11/17/2010	12:29:50	35	BD(S)	93.000	SPWR.GC	867652AC3	GACC	11/17/2010	12:29:50	35	C(B)	96.250	3.49%	\$ 737.50
28	11/17/2010	12:37:40	25	BD(S)	93.000	SPWR.GC	867652AC3	GACC	11/17/2010	12:40:27	25	C(B)	96.250	3.49%	\$ 412.50
29	11/17/2010	15:15:00	50	BD(S)	92.750	SPWR.GC	867652AC3	GACC	11/17/2010	14:37:31	50	C(B)	96.000	3.50%	\$ 1,225.00
30	11/18/2010	10:19:00	75	BD(S)	92.500	SPWR.GC	867652AC3	GACC	11/18/2010	10:26:41	75	C(B)	95.500	3.24%	\$ 1,850.00
31	11/19/2010	13:47:10	100	BD(S)	91.000	SPWR.GC	867652AC3	GACC	11/19/2010	13:48:44	100	C(B)	94.250	3.57%	\$ 1,229.80
32	11/22/2010	13:22:00	25	BD(S)	91.000	SPWR.GC	867652AC3	GACC	11/22/2010	13:20:11	25	C(B)	94.500	3.85%	\$ 475.00

Global Arena Capital Corp. ("GACC")
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 Exhibit A

33	11/24/2010	10:15:00	75	BD(S)	90,250	SPWR.GC	867652AC3	GACC	11/24/2010	10:31:02	75	C(B)	93,250	3.32%	\$ 1,950.00
34	11/24/2010	11:18:00	100	BD(S)	90,250	SPWR.GC	867652AC3	GACC	11/24/2010	11:18:30	100	C(B)	93,500	3.60%	\$ 1,246.45
35	11/24/2010	14:49:00	40	BD(S)	90,250	SPWR.GC	867652AC3	GACC	11/24/2010	14:52:32	40	C(B)	93,500	3.60%	\$ 499.58
36	11/24/2010	14:57:00	17	BD(S)	90,250	SPWR.GC	867652AC3	GACC	11/24/2010	14:52:32	17	C(B)	93,500	3.60%	\$ 152.50
37	11/29/2010	10:30:00	25	BD(S)	89,625	SPWR.GC	867652AC3	GACC	11/29/2010	10:31:34	25	C(B)	92,875	3.63%	\$ 412.50
38	11/29/2010	11:54:00	80	BD(S)	89,625	SPWR.GC	867652AC3	GACC	11/29/2010	12:07:25	80	C(B)	92,875	3.63%	\$ 1,008.26
39	11/30/2010	10:23:00	30	BD(S)	89,500	SPWR.GC	867652AC3	GACC	11/30/2010	10:26:55	30	C(B)	92,750	3.63%	\$ 575.00
40	12/01/2010	12:18:00	15	BD(S)	89,250	SPWR.GC	867652AC3	GACC	12/01/2010	12:25:05	15	C(B)	92,500	3.64%	\$ 87.50
41	12/03/2010	11:06:00	100	BD(S)	90,000	SPWR.GC	867652AC3	GACC	12/03/2010	11:10:42	100	C(B)	93,250	3.61%	\$ 1,252.00
42	12/03/2010	13:41:00	30	BD(S)	90,000	SPWR.GC	867652AC3	GACC	12/03/2010	13:45:03	30	C(B)	93,250	3.61%	\$ 575.00
43	12/06/2010	15:20:56	20	BD(S)	91,250	SPWR.GC	867652AC3	GACC	12/06/2010	15:24:40	20	C(B)	94,500	3.58%	\$ 250.00
44	12/07/2010	15:44:29	25	BD(S)	91,000	SPWR.GC	867652AC3	GACC	12/07/2010	15:41:10	25	C(B)	94,250	3.57%	\$ 412.50
45	12/08/2010	13:10:01	20	BD(S)	91,500	SPWR.GC	867652AC3	GACC	12/08/2010	13:23:07	20	C(B)	94,250	3.01%	\$ 150.00
46	12/14/2010	10:46:11	75	BD(S)	93,500	SPWR.GC	867652AC3	GACC	12/14/2010	10:38:33	75	C(B)	96,750	3.48%	\$ 880.73
47	12/16/2010	12:51:59	50	BD(S)	93,000	SPWR.GC	867652AC3	GACC	12/16/2010	13:02:07	50	C(B)	96,250	3.49%	\$ 592.70
48	12/22/2010	12:41:43	25	BD(S)	93,000	SPWR.GC	867652AC3	GACC	12/22/2010	12:46:50	25	C(B)	96,250	3.49%	\$ 412.50
49	11/15/2010	12:45:00	100	BD(S)	94,500	SPWR.GC	867652AC3	GACC						3.44%	
				BD(S)	94,500	SPWR.GC	867652AC3	GACC	11/15/2010	13:25:00	50	C(B)	97,750		\$ 1,225.00
				BD(S)	94,500	SPWR.GC	867652AC3	GACC	11/15/2010	13:25:00	25	C(B)	97,750		\$ 412.50
				BD(S)	94,500	SPWR.GC	867652AC3	GACC	11/15/2010	13:25:00	25	C(B)	97,750		\$ 412.50
50	01/25/2011	10:13:10	11	BD(S)	93,375	DF.GB	242361AB9	GACC	01/25/2011	10:20:46	11	C(B)	98,675	6.75%	\$ 253.39
51	01/04/2011	13:46:05	90	BD(S)	91,000	BYD.GK	09889RAA7	GACC	01/04/2011	13:48:12	90	C(B)	94,750	4.12%	\$ 1,032.66
52	01/04/2011	11:59:33	28	BD(S)	70,500	DEXM.AA	25212WAA8	GACC	01/04/2011	12:06:13	28	C(B)	73,250	3.90%	\$ 179.77
53	01/04/2011	11:59:51	27	BD(S)	70,500	DEXM.AA	25212WAA8	GACC	01/04/2011	12:03:35	27	C(B)	73,250	3.90%	\$ 173.35
54	01/12/2011	12:04:43	20	BD(S)	104,500	DRYS.GA	262498AB4	GACC	01/12/2011	12:28:26	20	C(B)	107,750	3.11%	\$ 250.00
55	01/13/2011	9:46:58	25	BD(S)	103,750	DRYS.GA	262498AB4	GACC	01/13/2011	10:02:06	25	C(B)	107,000	3.13%	\$ 412.50
56	01/13/2011	11:26:35	30	BD(S)	103,625	DRYS.GA	262498AB4	GACC	01/13/2011	11:36:10	30	C(B)	106,875	3.14%	\$ 575.00
57	01/14/2011	11:18:00	50	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	11:28:24	50	C(B)	74,550	4.27%	\$ 456.07
58	01/14/2011	11:18:00	21	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	11:29:18	21	C(B)	74,550	4.27%	\$ 191.55
59	01/14/2011	11:18:00	40	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	11:30:04	40	C(B)	74,550	4.27%	\$ 364.86
60	01/14/2011	11:18:00	55	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	11:30:59	55	C(B)	74,550	4.27%	\$ 501.68
61	01/14/2011	11:18:00	70	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	11:31:58	70	C(B)	74,550	4.27%	\$ 638.50
62	01/14/2011	11:47:00	27	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	11:50:55	27	C(B)	74,350	3.99%	\$ 192.28
63	01/14/2011	11:47:00	37	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	11:51:45	37	C(B)	74,550	4.27%	\$ 337.50
64	01/14/2011	14:41:00	40	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	01/14/2011	14:54:14	40	C(B)	74,250	3.85%	\$ 244.86
65	01/18/2011	11:11:08	20	BD(S)	102,750	DRYS.GA	262498AB4	GACC	01/18/2011	11:20:11	20	C(B)	106,000	3.16%	\$ 250.00
66	01/18/2011	13:44:47	25	BD(S)	101,750	DRYS.GA	262498AB4	GACC	01/18/2011	13:48:56	25	C(B)	105,000	3.19%	\$ 412.50
67	01/18/2011	15:35:21	25	BD(S)	101,500	DRYS.GA	262498AB4	GACC	01/18/2011	15:36:15	25	C(B)	104,750	3.20%	\$ 412.50
68	01/18/2011	10:42:13	45	BD(S)	81,000	MBL.GF	55262CAH3	GACC	01/18/2011	10:58:35	45	C(B)	84,500	4.32%	\$ 419.53
69	01/19/2011	9:52:45	30	BD(S)	101,500	DRYS.GA	262498AB4	GACC	01/19/2011	9:56:55	30	C(B)	104,750	3.20%	\$ 575.00
70	01/19/2011	10:13:04	35	C(S)	103,000	SLM.GJG	78442FEH7	GACC	01/19/2011	10:11:39	35	BD(B)	107,000	3.74%	\$ 295.23

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71	01/24/2011	12:19:22	50	BD(S)	98,000	DRYS.GA	262498AB4	GACC	01/24/2011	12:21:03	50	C(B)	101,250	3.32%	\$ 1,002.70
72	01/25/2011	10:06:10	45	BD(S)	69,000	DEXM.AA	25212WAA8	GACC	01/25/2011	10:15:17	45	C(B)	72,000	4.35%	\$ 421.60
73	01/25/2011	9:36:07	100	BD(S)	96,500	DRYS.GA	262498AB4	GACC	01/25/2011	9:32:42	100	C(B)	100,250	3.89%	\$ 2,524.45
74	01/25/2011	9:53:56	100	BD(S)	96,500	DRYS.GA	262498AB4	GACC	01/25/2011	9:54:56	100	C(B)	99,750	3.37%	\$ 2,024.45
75	01/25/2011	10:13:58	40	BD(S)	96,250	DRYS.GA	262498AB4	GACC	01/25/2011	10:17:30	40	C(B)	99,500	3.38%	\$ 811.05
76	01/25/2011	11:05:27	20	BD(S)	96,500	DRYS.GA	262498AB4	GACC	01/25/2011	11:08:20	20	C(B)	99,750	3.37%	\$ 250.00
77	01/25/2011	9:42:05	40	BD(S)	104,125	SLM.GJJ	78442FEJ3	GACC	01/25/2011	9:55:56	40	C(B)	108,375	4.08%	\$ 492.15
78	01/26/2011	10:14:20	20	BD(S)	71,000	DEXM.AA	25212WAA8	GACC	01/26/2011	10:24:59	20	C(B)	74,050	4.30%	\$ 185.42
79	01/26/2011	10:26:14	30	BD(S)	97,340	DRYS.GA	262498AB4	GACC	01/26/2011	10:27:10	30	C(B)	101,250	4.02%	\$ 773.00
80	01/26/2011	10:13:33	30	BD(S)	95,750	SPWR.GC	86765ZAC3	GACC	01/26/2011	10:22:40	30	C(B)	99,250	3.66%	\$ 274.43
81	01/26/2011	12:49:00	50	BD(S)	99,000	DRYS.GA	262498AB4	GACC	01/26/2011	12:54:03	50	C(B)	102,250	3.28%	\$ 996.35
82	01/26/2011	13:13:00	100	BD(S)	98,500	DRYS.GA	262498AB4	GACC	01/26/2011	13:20:04	100	C(B)	102,250	3.28%	\$ 1,992.70
83	02/01/2011	10:19:00	35	BD(S)	98,500	DRYS.GA	262498AB4	GACC	02/01/2011	10:23:45	35	C(B)	102,250	3.81%	\$ 874.67
84	02/02/2011	11:27:00	20	BD(S)	99,875	DRYS.GA	262498AB4	GACC	02/02/2011	11:34:35	20	C(B)	103,625	3.75%	\$ 350.00
85	02/03/2011	9:51:57	18	BD(S)	70,500	DEXM.AA	25212WAA8	GACC	02/03/2011	10:04:35	18	C(B)	73,500	4.26%	\$ 140.00
86	02/07/2011	13:46:30	39	BD(S)	72,000	DEXM.AA	25212WAA8	GACC	02/07/2011	13:48:54	39	C(B)	75,000	4.17%	\$ 330.41
87	02/07/2011	11:13:11	50	BD(S)	88,375	EK.JR	277461BJ7	GACC	02/07/2011	11:02:55	50	C(B)	91,875	3.96%	\$ 424.37
88	02/07/2011	11:26:55	25	BD(S)	88,375	EK.JR	277461BJ7	GACC	02/07/2011	11:26:14	25	C(B)	91,875	3.96%	\$ 212.19
89	02/07/2011	12:42:47	150	BD(S)	88,750	EK.JR	277461BJ7	GACC	02/07/2011	12:53:02	150	C(B)	92,250	3.94%	\$ 1,256.25
90	02/09/2011	11:56:45	50	BD(S)	91,000	EK.JR	277461BJ7	GACC	02/09/2011	11:57:41	50	C(B)	94,500	3.85%	\$ 385.00
91	02/10/2011	10:12:00	100	BD(S)	90,750	EK.JR	277461BJ7	GACC	02/10/2011	10:27:23	100	C(B)	94,250	3.86%	\$ 777.50
92	02/15/2011	10:31:00	17	BD(S)	71,625	DEXM.AA	25212WAA8	GACC	02/15/2011	10:35:18	17	C(B)	74,625	4.19%	\$ 110.00
93	02/15/2011	13:32:00	39	BD(S)	71,625	DEXM.AA	25212WAA8	GACC	02/15/2011	13:37:10	39	C(B)	74,625	4.19%	\$ 334.78
94	02/15/2011	12:55:00	25	BD(S)	90,000	EK.JR	277461BJ7	GACC	02/15/2011	13:09:59	25	C(B)	93,500	3.89%	\$ 200.00
95	02/16/2011	14:18:00	42	BD(S)	71,500	DEXM.AA	25212WAA8	GACC	02/16/2011	14:29:26	42	C(B)	74,500	4.20%	\$ 362.10
96	02/17/2011	13:45:00	18	BD(S)	91,000	EK.JR	277461BJ7	GACC	02/17/2011	13:49:57	18	C(B)	94,500	3.85%	\$ 138.60
97	02/22/2011	15:06:00	25	BD(S)	91,250	EK.JR	277461BJ7	GACC	02/22/2011	15:15:27	25	C(B)	95,000	4.11%	\$ 253.13
98	02/23/2011	9:49:00	20	BD(S)	91,500	EK.JR	277461BJ7	GACC	02/23/2011	9:51:18	20	C(B)	95,250	4.10%	\$ 201.00
99	03/01/2011	13:30:00	20	BD(S)	106,750	SLM.GJJ	78442FEJ3	GACC	03/01/2011	13:35:40	20	C(B)	110,000	3.04%	\$ 248.62
100	03/08/2011	11:16:38	15	BD(S)	85,375	EK.JR	277461BJ7	GACC	03/08/2011	11:17:28	15	C(B)	88,625	3.81%	\$ 87.50
101	03/22/2011	11:46:57	80	BD(S)	88,700	FRZ.AE	757344AF3	GACC	03/22/2011	11:57:16	80	C(B)	92,450	4.23%	\$ 601.55
102	03/22/2011	12:35:11	28	BD(S)	96,375	GOK.GB	37252CAB6	GACC	03/22/2011	12:46:11	28	C(B)	100,125	3.89%	\$ 240.45
103	03/28/2011	15:30:26	200	BD(S)	80,875	USU.GC	90333EAC2	GACC	03/28/2011	15:38:49	200	C(B)	84,125	4.02%	\$ 1,485.75
104	03/31/2011	11:41:29	20	BD(S)	80,500	USU.GC	90333EAC2	GACC	03/31/2011	11:44:28	20	C(B)	83,750	4.04%	\$ 150.90
105	01/26/2011	10:33:43	234	BD(S)	72,000	DEXM.AA	25212WAA8	GACC						3.88%	
					72,000	DEXM.AA	25212WAA8	GACC	01/26/2011	10:41:48	200	C(B)	74,750	3.82%	\$ 1,194.40
					72,000	DEXM.AA	25212WAA8	GACC	01/26/2011	10:42:46	34	C(B)	75,050	4.24%	\$ 305.05
106	01/26/2011	11:55:00	32	BD(S)	70,875	DEXM.AA	25212WAA8	GACC						3.88%	
					70,875	DEXM.AA	25212WAA8	GACC	01/26/2011	12:10:08	26	C(B)	73,625	3.88%	\$ 164.02
107	04/14/2011	11:59:45	350	BD(S)	80,375	USU.GC	90333EAC2	GACC	04/14/2011	11:53:11	350	C(B)	83,625	4.04%	\$ 2,654.31
108	04/26/2011	12:57:48	50	BD(S)	88,250	CEDC.GA	153435AA0	GACC	04/26/2011	13:04:15	50	C(B)	91,500	3.68%	\$ 596.89

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109	04/26/2011	13:25:23	50	BD(S)	88,250	CEDC.GA	159435AA0	GACC	04/26/2011	13:29:18	50	C(B)	91,000	3.12%	\$ 346.89
110	04/26/2011	13:52:00	50	BD(S)	81,750	USU.GC	90333EAC2	GACC	04/26/2011	13:56:08	50	C(B)	85,000	3.98%	\$ 357.88
111	04/26/2011	14:46:19	250	BD(S)	81,750	USU.GC	90333EAC2	GACC	04/26/2011	14:49:28	250	C(B)	85,000	3.98%	\$ 1,789.38
112	04/27/2011	14:44:00	20	BD(S)	99,000	DRYS.GA	262498AB4	GACC	04/27/2011	14:49:32	20	C(B)	102,250	3.28%	\$ 202.52
113	05/06/2011	15:38:37	50	BD(S)	80,000	USU.GC	90333EAC2	GACC	05/06/2011	15:42:58	50	C(B)	83,200	4.00%	\$ 360.00
114	05/20/2011	10:29:39	50	BD(S)	92,625	SOLO.GB	834260AB7	GACC	05/20/2011	10:32:30	50	C(B)	96,875	4.59%	\$ 564.27
115	05/23/2011	11:27:50	50	BD(S)	88,375	DRYS.GA	262498AB4	GACC	05/23/2011	11:14:58	50	C(B)	92,125	4.24%	\$ 558.21
116	05/24/2011	9:53:40	90	BD(S)	86,250	DRYS.GA	262498AB4	GACC	05/24/2011	9:59:25	90	C(B)	92,000	4.25%	\$ 1,008.14
117	05/25/2011	10:37:03	25	BD(S)	87,000	DRYS.GA	262498AB4	GACC	05/25/2011	10:35:45	25	C(B)	90,500	4.02%	\$ 226.85
118	06/30/2011	9:44:38	40	BD(S)	90,000	EK-JR	277461B7	GACC	06/30/2011	9:49:44	40	C(B)	93,750	4.17%	\$ 339.60
119	07/05/2011	16:35:00	29	BD(S)	81,000	EK-JR	277461B7	GACC	07/05/2011	16:35:00	29	C(B)	84,250	4.01%	\$ 195.52
120	8/11/2011	13:30:54	50	BD(S)	91,875	IEP.GH	451102AH0	GACC	08/11/2011	13:41:27	50	C(B)	99,875	8.71%	\$ 2,621.88
121	08/12/2011	10:51:48	20	BD(S)	56,500	EK-JR	277461B7	GACC	08/12/2011	11:02:36	20	C(B)	59,000	4.42%	\$ 100.00
122	08/15/2011	11:55:00	20	BD(S)	75,500	DRYS.GA	262498AB4	GACC	08/15/2011	12:11:35	20	C(B)	78,750	4.36%	\$ 153.21
123	08/16/2011	12:45:00	30.0	BD(S)	89,500	CVO.GB	15871BAA9	GACC	08/16/2011	13:05:27	30.0	C(B)	93,250	4.19%	\$ 228.21
124	9/7/2011	11:40:00	27	BD(S)	83,875	AIQ.GG	018606AL7	GACC	09/07/2011	11:36:29	27	C(B)	87,125	3.87%	\$ 198.11
125	09/07/2011	11:30:00	27	BD(S)	85,000	BYD.GK	09889FAA7	GACC	09/07/2011	11:37:52	27	C(B)	88,250	3.82%	\$ 253.26
126	09/07/2011	11:36:14	31	BD(S)	73,000	DRYS.GA	262498AB4	GACC	09/07/2011	11:40:27	31	C(B)	76,250	4.45%	\$ 272.02
127	09/26/2011	13:32:17	50.0	BD(S)	89,375	CBB.GS	171871AMB	GACC	9/26/2011	13:50:45	50.0	C(B)	92,875	3.92%	\$ 413.84
128	09/26/2011	16:14:00	40.0	BD(S)	74,000	CEDC.GA	159435AA0	GACC	09/26/2011	16:34:15	40.0	C(B)	77,000	4.05%	\$ 389.96
129	09/26/2011	13:18:00	50	BD(S)	95,000	DF.GB	242361ABB	GACC	09/26/2011	13:46:41	50	C(B)	98,750	3.95%	\$ 769.25
130	09/26/2011	16:03:00	30	BD(S)	70,000	DRYS.GA	262498AB4	GACC	09/26/2011	16:32:28	30	C(B)	73,200	4.57%	\$ 233.40
131	09/26/2011	13:17:00	50	BD(S)	92,500	XCO.AB	269279AD7	GACC	09/26/2011	13:40:13	50	C(B)	96,250	4.05%	\$ 445.88
132	09/27/2011	14:53:15	100	BD(S)	89,000	GNW.IS	37247DAK2	GACC	09/27/2011	14:56:35	100	C(B)	92,500	3.93%	\$ 883.40
133	9/30/2011	12:51:55	25	BD(S)	75,000	BYD.GK	09889FAA7	GACC	09/30/2011	13:18:08	25	C(B)	78,000	4.00%	\$ 198.87
	8/11/2011	14:29:22	150	BD(S)	64,150	CEDC.GA	159435AA0	GACC						4.29%	
					64,150	CEDC.GA	159435AA0	GACC	08/11/2011	14:36:19	25	C(B)	66,900	4.29%	\$ 265.71
					64,150	CEDC.GA	159435AA0	GACC	08/11/2011	14:37:50	25	C(B)	66,900	4.29%	\$ 265.71
					64,150	CEDC.GA	159435AA0	GACC	08/11/2011	14:38:36	25	C(B)	66,900	4.29%	\$ 265.71
					64,150	CEDC.GA	159435AA0	GACC	08/11/2011	14:41:54	25	C(B)	66,900	4.29%	\$ 265.71
					64,150	CEDC.GA	159435AA0	GACC	08/11/2011	14:42:49	25	C(B)	66,900	4.29%	\$ 265.71
	09/22/2011	14:59:45	40	BD(S)	70,750	DRYS.GA	262498AB4	GACC						4.59%	
					70,750	DRYS.GA	262498AB4	GACC	09/22/2011	15:12:25	20	C(B)	74,000	4.59%	\$ 160.41
					70,750	DRYS.GA	262498AB4	GACC	09/22/2011	15:13:20	20	C(B)	74,000	4.59%	\$ 160.41
136	07/05/2011	16:35:00	15	BD(S)	81,000	EK-JR	277461B7	GACC	07/05/2011	16:35:00	15	C(B)	84,250	4.01%	\$ 87.50
137	07/13/2011	16:01:00	30	BD(S)	86,750	CZN.GM	177342AP7	GACC	07/13/2011	16:01:00	30	C(B)	89,550	3.23%	\$ 189.38
138	08/12/2011	10:51:48	20	BD(S)	56,500	EK-JR	277461B7	GACC	08/12/2011	11:02:36	20	C(B)	59,000	4.42%	\$ 100.00
139	08/15/2011	15:28:36	20	BD(S)	62,250	CEDC.GA	159435AA0	GACC	08/15/2011	15:30:57	20	C(B)	70,750	3.66%	\$ 100.00
140	08/17/2011	14:30:12	30	BD(S)	66,500	CEDC.GA	159435AA0	GACC	08/17/2011	14:42:24	30	C(B)	69,000	3.76%	\$ 211.35
141	08/17/2011	16:02:34	30	BD(S)	67,750	CEDC.GA	159435AA0	GACC	08/17/2011	16:13:23	30	C(B)	70,250	3.69%	\$ 201.23
142	08/19/2011	15:24:17	30	BD(S)	68,000	CEDC.GA	159435AA0	GACC	08/19/2011	15:35:21	30	C(B)	70,500	3.68%	\$ 199.20

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143	09/02/2011	14:05:03	30	BD(S)	75,000	DRYS.GA	262498AB4	GACC	09/02/2011	14:02:34	30	C(B)	77,500	3.33%	\$ 174.00
144	09/20/2011	12:51:00	20	BD(S)	62,000	USU.GC	90333EAC2	GACC	09/20/2011	13:00:11	20	C(B)	64,400	3.87%	\$ 80.00
145	09/22/2011	14:42:35	20	BD(S)	86,500	LNG.GB	16411RAE9	GACC	09/22/2011	14:44:01	20	C(B)	89,750	3.76%	\$ 132.73
146	09/26/2011	15:57:00	20	BD(S)	77,750	BYD.GK	09889AA7	GACC	09/26/2011	16:33:29	20	C(B)	80,750	3.86%	\$ 141.27
147	09/26/2011	13:19:00	50	BD(S)	89,000	TPC.GG	901109AB4	GACC	09/26/2011	13:48:39	50	C(B)	92,500	3.93%	\$ 392.75
	08/12/2011	12:16:00	85	BD(S)	89,950	CVO.GB	15671BAA9	GACC						3.52%	
148					89,950	CVO.GB	15671BAA9	GACC	08/12/2011	12:27:08	20	C(B)	92,700	3.06%	\$ 78.66
					89,950	CVO.GB	15671BAA9	GACC	08/12/2011	12:28:28	19	C(B)	93,000	3.39%	\$ 131.73
					89,950	CVO.GB	15671BAA9	GACC	08/12/2011	12:31:31	15	C(B)	93,450	3.89%	\$ 125.00
					89,950	CVO.GB	15671BAA9	GACC	08/12/2011	12:32:22	20	C(B)	93,450	3.89%	\$ 228.66
149	10/26/2011	10:15:00	12	BD(S)	93,500	GNW.JO	37247DAMB	GACC	10/26/2011	10:02:08	12	C(B)	106,460	13.86%	\$ 1,155.20
150	10/04/2011	15:58:00	25	BD(S)	60,000	EIX.IC	281023AR2	GACC	10/04/2011	16:00:15	25	C(B)	62,750	4.58%	\$ 156.50
151	10/11/2011	9:47:00	50	BD(S)	70,250	EIX.IC	281023AR2	GACC	10/11/2011	9:57:04	50	C(B)	73,500	4.63%	\$ 381.57
152	10/14/2011	15:03:00	19	BD(S)	69,000	DRYS.GA	262498AB4	GACC	10/14/2011	15:28:27	19	C(B)	72,050	4.42%	\$ 125.89
153	10/14/2011	16:06:30	15	BD(S)	91,500	TPC.GG	901109AB4	GACC	10/14/2011	16:09:39	15	C(B)	95,000	3.83%	\$ 106.99
154	10/18/2011	10:22:35	100	BD(S)	93,500	BAC.GRE	060505CL6	GACC	10/18/2011	10:26:36	100	C(B)	97,200	3.96%	\$ 754.75
155	10/18/2011	10:12:59	100	BD(S)	69,000	CEDC.GA	153435AA0	GACC	10/18/2011	10:18:20	100	C(B)	71,800	4.06%	\$ 1,109.50
156	10/18/2011	10:39:00	100	BD(S)	100,000	NDAQ.GD	631103AD0	GACC	10/18/2011	10:41:55	100	C(B)	103,500	3.50%	\$ 1,250.00
157	10/18/2011	10:30:00	50	BD(S)	59,000	USU.GC	90333EAC2	GACC	10/18/2011	10:39:13	50	C(B)	60,250	3.88%	\$ 498.60
158	10/19/2011	13:53:00	15	BD(S)	91,250	TPC.GG	901109AB4	GACC	10/19/2011	13:59:08	15	C(B)	94,900	4.00%	\$ 130.03
159	10/19/2011	15:18:20	30	BD(S)	60,500	USU.GC	90333EAC2	GACC	10/19/2011	15:24:50	30	C(B)	62,750	3.72%	\$ 275.00
160	10/24/2011	14:35:00	100	BD(S)	100,625	AEE.IC	02360XAM9	GACC	10/24/2011	14:37:24	100	C(B)	104,125	3.48%	\$ 1,376.81
161	10/24/2011	13:10:00	20	BD(S)	71,375	EIX.IC	281023AR2	GACC	10/24/2011	13:18:21	20	C(B)	74,625	4.55%	\$ 144.66
162	10/24/2011	13:08:00	20	BD(S)	75,000	GOK.GB	37252CAB6	GACC	10/24/2011	13:19:27	20	C(B)	78,250	4.33%	\$ 114.50
163	10/24/2011	12:22:41	100	BD(S)	92,171	MT.AJ	03938LAQ7	GACC	10/24/2011	12:31:05	100	C(B)	95,671	3.80%	\$ 716.44
164	10/25/2011	13:08:00	30	BD(S)	71,000	CEDC.GA	153435AA0	GACC	10/25/2011	13:15:46	30	C(B)	73,750	3.87%	\$ 241.38
165	10/25/2011	15:21:00	80	BD(S)	92,875	GNW.JO	37247DAMB	GACC	10/25/2011	15:18:14	80	C(B)	96,625	4.04%	\$ 756.14
166	10/25/2011	14:03:00	40	BD(S)	60,000	USU.GC	90333EAC2	GACC	10/25/2011	14:16:21	40	C(B)	62,450	4.08%	\$ 461.60
167	10/26/2011	12:20:45	100	BD(S)	100,850	ARW.GM	04273WAB7	GACC	10/26/2011	12:22:30	100	C(B)	104,350	3.47%	\$ 1,402.32
168	10/26/2011	11:52:00	100	BD(S)	102,000	EXPE.GF	30212PAH8	GACC	10/26/2011	11:54:52	100	C(B)	105,500	3.43%	\$ 1,664.00
169	10/26/2011	12:19:11	100	BD(S)	101,500	FDO.AA	307000AA7	GACC	10/26/2011	12:20:50	100	C(B)	105,000	3.45%	\$ 1,551.20
170	11/22/2011	15:49:02	60	BD(S)	94,500	BYD.GN	103304BG5	GACC	11/22/2011	15:30:51	60	C(B)	99,000	3.70%	\$ 1,493.31
171	11/22/2011	15:28:51	60	BD(S)	89,375	MVA.AF	624758AB4	GACC	11/22/2011	15:31:45	60	C(B)	92,875	3.92%	\$ 1,649.55
172	11/23/2011	11:00:00	50	BD(S)	91,750	GNW.JO	37247DAMB	GACC	11/23/2011	11:08:33	50	C(B)	95,420	4.00%	\$ 458.75
173	11/23/2011	13:40:02	22	BD(S)	107,676	MT.AG	03938LAM6	GACC	11/23/2011	13:41:45	22	C(B)	111,926	3.95%	\$ 243.03
174	11/23/2011	13:45:45	60	BD(S)	107,676	MT.AG	03938LAM6	GACC	11/23/2011	13:37:52	60	C(B)	111,966	3.98%	\$ 706.90
175	11/23/2011	13:45:45	90	BD(S)	107,676	MT.AG	03938LAM6	GACC	11/23/2011	13:37:52	90	C(B)	111,926	3.95%	\$ 1,024.35
176	11/23/2011	14:29:13	15	BD(S)	107,860	MT.AG	03938LAM6	GACC	11/23/2011	14:31:41	15	C(B)	112,110	3.94%	\$ 168.31
177	11/28/2011	15:03:15	30	BD(S)	108,150	MT.AG	03938LAM6	GACC	11/28/2011	15:03:53	30	C(B)	112,150	3.70%	\$ 262.94
178	11/29/2011	15:38:17	30	BD(S)	107,800	MT.AG	03938LAM6	GACC	11/29/2011	15:43:21	30	C(B)	111,800	3.71%	\$ 265.97
179	12/05/2011	11:00:50	100	BD(S)	91,180	MT.AJ	03938LAQ7	GACC	12/05/2011	10:59:09	100	C(B)	94,680	3.84%	\$ 748.86

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180	12/07/2011	9:50:18	35	BD(S)	95,000	BAC.HAE	06050TKW1	GACC	12/07/2011	10:02:14	35	C(B)	98,450	3.63%	\$ 293.12
181	12/07/2011	11:34:48	200	BD(S)	94,700	BAC.HAE	06050TKW1	GACC	12/07/2011	11:36:39	200	C(B)	97,950	3.43%	\$ 2,712.00
182	12/09/2011	10:57:00	14	BD(S)	103,875	IEP.GH	451102AH0	GACC	12/09/2011	11:07:04	14	C(B)	108,125	4.09%	\$ 116.55
183	12/09/2011	14:47:00	57	BD(S)	103,875	IEP.GH	451102AH0	GACC	12/09/2011	14:50:54	57	C(B)	107,875	3.85%	\$ 515.58
184	12/12/2011	15:54:08	25	BD(S)	109,750	MT.AG	03938LAM6	GACC	12/12/2011	15:55:46	25	C(B)	114,000	3.87%	\$ 269.56
185	12/14/2011	9:35:48	60	BD(S)	93,500	BAC.HAE	06050TKW1	GACC	12/14/2011	9:43:39	60	C(B)	97,000	3.74%	\$ 529.20
186	12/14/2011	11:58:48	37	BD(S)	93,750	BAC.HAE	06050TKW1	GACC	12/14/2011	12:07:53	37	C(B)	97,250	3.73%	\$ 323.75
187	12/15/2011	10:35:05	25	BD(S)	93,750	BAC.HAE	06050TKW1	GACC	12/15/2011	10:35:58	25	C(B)	97,250	3.73%	\$ 218.75
188	12/16/2011	11:09:38	20	C(S)	95,650	GNW.GD	3724DAE6	GACC	12/16/2011	11:09:08	20	BD(B)	98,900	3.29%	\$ 250.00
189	12/16/2011	11:10:45	25	C(S)	90,750	GNW.JO	3724DAMB	GACC	12/16/2011	11:10:19	25	BD(B)	94,000	3.46%	\$ 281.40
190	12/16/2011	13:18:16	200	BD(S)	103,625	IEP.GH	451102AH0	GACC	12/16/2011	13:28:38	200	C(B)	107,625	3.86%	\$ 1,823.95
191	12/20/2011	13:51:06	100	BD(S)	92,500	JEF.GD	472319AB8	GACC	12/20/2011	13:59:33	100	C(B)	95,000	3.78%	\$ 743.50
192	12/20/2011	13:35:00	100	BD(S)	110,900	MT.AG	03938LAM6	GACC	12/20/2011	13:36:00	100	C(B)	114,400	3.16%	\$ 993.66
193	12/21/2011	15:47:53	25	BD(S)	82,750	THC.GU	88033GAV2	GACC	12/21/2011	17:00:04	25	C(B)	86,000	3.93%	\$ 307.73
194	12/22/2011	10:38:00	30	BD(S)	94,000	BYD.GN	103304BG5	GACC	12/22/2011	10:49:59	30	C(B)	97,500	3.72%	\$ 650.00
195	12/22/2011	11:09:00	60	BD(S)	92,875	JEF.GD	472319AB8	GACC	12/22/2011	11:19:36	60	C(B)	96,375	3.77%	\$ 439.39
196	12/27/2011	12:15:02	50	BD(S)	98,375	BAC.HSC	59018YN64	GACC	12/27/2011	10:49:04	50	C(B)	102,225	3.91%	\$ 744.50
197	12/27/2011	12:39:00	50	BD(S)	111,250	MT.AG	03938LAM6	GACC	12/27/2011	12:39:06	50	C(B)	115,000	3.37%	\$ 617.88
198	12/27/2011	8:59:18	30	BD(S)	96,750	TLGK	87927VAE8	GACC	12/27/2011	16:07:05	30	C(B)	100,500	3.88%	\$ 257.15
199	12/27/2011	14:59:45	50	BD(S)	96,450	TLGK	87927VAE8	GACC	12/27/2011	15:06:58	50	C(B)	100,200	3.89%	\$ 433.07
200	12/28/2011	10:58:00	34	BD(S)	112,000	MT.AG	03938LAM6	GACC	12/28/2011	11:04:18	34	C(B)	116,250	3.79%	\$ 302.60
201	01/03/2012	11:58:00	25	BD(S)	96,875	GNW.JO	3724DAMB	GACC	01/03/2012	12:00:31	25	C(B)	100,625	3.87%	\$ 210.94
202	01/03/2012	10:48:50	130	BD(S)	113,480	MT.AG	03938LAM6	GACC	01/03/2012	11:29:32	130	C(B)	117,430	3.48%	\$ 1,800.96
203	01/12/2012	11:53:05	76	BD(S)	114,750	MT.AG	03938LAM6	GACC	01/12/2012	11:52:54	76	C(B)	119,000	3.70%	\$ 1,259.05
204	01/13/2012	11:02:00	37	BD(S)	98,850	GNW.JO	3724DAMB	GACC	01/13/2012	11:09:15	37	C(B)	102,600	3.79%	\$ 290.28
205	01/13/2012	14:06:56	200	BD(S)	98,000	TLGU	87927VAW8	GACC	01/13/2012	14:10:13	200	C(B)	101,000	3.06%	\$ 1,786.00
206	01/18/2012	15:47:43	50	BD(S)	97,250	TLGT	87927VAU2	GACC	01/18/2012	15:49:45	50	C(B)	100,500	3.34%	\$ 594.15
207	01/19/2012	10:55:50	20	BD(S)	97,900	TLGT	87927VAU2	GACC	01/19/2012	10:56:24	20	C(B)	101,150	3.32%	\$ 234.90
208	01/19/2012	12:12:50	50	BD(S)	97,900	TLGT	87927VAU2	GACC	01/19/2012	12:13:21	50	C(B)	101,150	3.32%	\$ 587.26
209	01/24/2012	13:45:40	150	BD(S)	75,500	UNCF.AB	90466MAC3	GACC	01/24/2012	13:56:00	150	C(B)	76,250	3.64%	\$ 908.70
210	01/24/2012	15:13:00	22	BD(S)	75,750	UNCF.AB	90466MAC3	GACC	01/24/2012	15:18:05	22	C(B)	78,500	3.63%	\$ 131.71
211	01/26/2012	10:53:15	30	BD(S)	73,000	DRYS.GA	262498AB4	GACC	01/26/2012	10:58:51	30	C(B)	75,900	3.97%	\$ 167.01
212	01/26/2012	16:05:58	75	BD(S)	82,250	UNCF.AB	90466MAC3	GACC	01/26/2012	16:10:24	75	C(B)	85,300	3.71%	\$ 535.58
213	02/03/2012	9:46:00	100	BD(S)	85,000	UNCF.AB	90466MAC3	GACC	02/03/2012	9:49:46	100	C(B)	88,250	3.82%	\$ 836.00
214	10/03/2011	10:55:10	10	C(S)	56,000	DRYS.GA	262498AB4	GACC	09/30/2011	12:57:07	10	BD(B)	62,500	10.40%	\$ 250.00
	11/22/2011	10:15:00	210	BD(S)	95,250	BAC.GRE	060505CL6	GACC						3.94%	
215					95,250	BAC.GRE	060505CL6	GACC	11/22/2011	10:18:36	60	C(B)	99,000	3.94%	\$ 432.63
					95,250	BAC.GRE	060505CL6	GACC	11/22/2011	10:19:04	150	C(B)	99,000	3.94%	\$ 1,081.57
	11/22/2011	15:49:55	75	BD(S)	94,500	BYD.GN	103304BG5	GACC						3.97%	
216					94,500	BYD.GN	103304BG5	GACC	11/22/2011	15:58:44	35	C(B)	98,250	3.97%	\$ 912.50
					94,500	BYD.GN	103304BG5	GACC	11/22/2011	15:59:29	40	C(B)	98,250	3.97%	\$ 1,095.54

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228					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	11:53:17	50	C(B)	80.125	3.55%	\$ 276.27
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	11:54:27	23	C(B)	80.125	3.55%	\$ 127.09
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	11:55:39	40	C(B)	80.125	3.55%	\$ 221.02
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	11:58:18	50	C(B)	80.375	3.88%	\$ 401.27
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	11:59:25	39	C(B)	80.125	3.55%	\$ 215.49
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	12:01:32	49	C(B)	80.125	3.55%	\$ 270.75
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	12:03:12	100	C(B)	80.125	3.55%	\$ 552.55
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	12:04:13	32	C(B)	80.125	3.55%	\$ 176.82
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	12:07:04	28	C(B)	80.125	3.55%	\$ 154.71
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	12:10:28	40	C(B)	80.125	3.55%	\$ 221.02
					77.375	UNCF.AB	90466MAC3	GACC	01/25/2012	12:12:30	125	C(B)	80.325	3.81%	\$ 940.69
229		BD(S)			82.250	UNCF.AB	90466MAC3	GACC	01/30/2012	16:28:11	50	C(B)	85.250	3.65%	\$ 332.05
					82.250	UNCF.AB	90466MAC3	GACC	01/30/2012	16:29:43	50	C(B)	85.250	3.65%	\$ 332.05
					82.250	UNCF.AB	90466MAC3	GACC	01/30/2012	16:32:01	20	C(B)	85.000	3.34%	\$ 82.82
					93.500	TI.GP	87927VAR9	GACC						3.74%	
					93.500	TI.GP	87927VAR9	GACC	02/03/2012	12:55:23	50	C(B)	97.000	3.74%	\$ 394.25
					93.500	TI.GP	87927VAR9	GACC	02/03/2012	12:56:20	50	C(B)	97.000	3.74%	\$ 394.25
					93.500	TI.GP	87927VAR9	GACC	02/03/2012	12:57:04	50	C(B)	97.000	3.74%	\$ 394.25
					93.500	TI.GP	87927VAR9	GACC	02/03/2012	12:58:03	40	C(B)	97.000	3.74%	\$ 315.40
231		BD(S)			84.625	UNCF.AB	90466MAC3	GACC	02/08/2012	12:34:01	64	C(B)	87.875	3.84%	\$ 541.86
232		BD(S)			104.78	IEP.GH	451102AH0	GACC	02/09/2012	14:34:49	17	C(B)	108.78	3.82%	\$ 280.00
233		BD(S)			98.875	CZN.GY	17453BAW1	GACC	02/09/2012	15:28:54	50	C(B)	102.375	3.54%	\$ 607.99
234		BD(S)			106.75	AXA.GB	054536AA5	GACC	02/09/2012	15:31:17	15	C(B)	110.75	3.75%	\$ 148.45
235		BD(S)			104.50	IEP.GH	451102AH0	GACC	02/10/2012	14:11:37	124	C(B)	108.25	3.59%	\$ 1,043.74
236		BD(S)			85.00	UNCF.AB	90466MAC3	GACC	02/10/2012	15:57:39	170	C(B)	88.25	3.82%	\$ 1,421.20
237		BD(S)			85.00	UNCF.AB	90466MAC3	GACC	02/13/2012	15:41:25	81	C(B)	88.20	3.76%	\$ 636.66
238		BD(S)			85.25	UNCF.AB	90466MAC3	GACC	02/23/2012	16:08:14	20	C(B)	88.50	3.81%	\$ 165.78
239		BD(S)			86.50	UNCF.AB	90466MAC3	GACC	02/24/2012	16:06:32	15	C(B)	89.75	3.76%	\$ 87.50
240		BD(S)			87.50	UNCF.AB	90466MAC3	GACC	02/28/2012	11:22:08	25	C(B)	90.75	3.71%	\$ 191.25
241		BD(S)			89.50	UNCF.AB	90466MAC3	GACC	03/01/2012	12:10:23	50	C(B)	92.75	3.63%	\$ 354.10
242		BD(S)			89.50	UNCF.AB	90466MAC3	GACC	03/01/2012	14:51:28	50	C(B)	92.85	3.74%	\$ 404.10
243		BD(S)			100.50	JEF.GJ	472319AH5	GACC	03/09/2012	14:28:24	192	C(B)	104.35	3.83%	\$ 1,641.79
244		BD(S)			99.875	TEF.HC	87938WAP8	GACC	03/21/2012	15:49:31	100	C(B)	103.125	3.81%	\$ 1,002.81
245		BD(S)			111.50	JEF.GH	472319AF9	GACC	03/26/2012	11:02:29	200	C(B)	115.25	3.36%	\$ 2,125.70
246		BD(S)			102.50	JEF.GJ	472319AH5	GACC	03/27/2012	12:00:05	80	C(B)	106.50	3.90%	\$ 756.40
247		BD(S)			94.50	TEF.HC	87938WAP8	GACC	04/12/2012	11:43:55	50	C(B)	97.75	3.44%	\$ 377.60
248		BD(S)			95.25	TEF.HC	87938WAP8	GACC	04/17/2012	17:22:00	75	C(B)	98.75	3.67%	\$ 739.05
249		C(S)			97.25	ANL.GI	002920AC0	GACC	05/02/2012	16:24:55	37	BD(B)	100.50	3.23%	\$ 328.65
250		C(S)			98.125	GNW.AA	37247DAP1	GACC	05/02/2012	16:26:08	80	BD(B)	99.375	3.27%	\$ 866.90
251		BD(S)			77.50	BONT.GA	09776NAB8	GACC	05/04/2012	16:01:37	100	C(B)	80.50	3.87%	\$ 682.75

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252	05/08/2012	11:26:26	30	C(S)	75.70	DRYS.GA	262498AB4	GACC	05/08/2012	11:22:09	30	BD(B)	78.75	3.87%	\$	336.19
253	05/09/2012	12:27:33	100	BD(S)	100.25	JEF.GJ	472319AH5	GACC	05/09/2012	12:31:05	100	C(B)	104.00	3.74%	\$	852.78
254	05/11/2012	14:13:00	37	BD(S)	100.125	JEF.GJ	472319AH5	GACC	05/11/2012	14:17:46	37	C(B)	103.875	3.75%	\$	290.93
255	06/05/2012	12:22:00	15	BD(S)	93.50	MDV.AF	56808RAD8	GACC	06/05/2012	12:19:55	15	C(B)	97.00	3.74%	\$	125.00
256	06/05/2012	14:47:17	20	BD(S)	66.50	DRYS.GA	262498AB4	GACC	06/05/2012	14:46:01	20	C(B)	69.25	4.14%	\$	147.01
257	06/07/2012	11:49:00	100	BD(S)	98.625	JEF.GJ	472319AH5	GACC	06/07/2012	11:52:46	100	C(B)	102.375	3.80%	\$	801.11
258	06/07/2012	11:48:37	100	BD(S)	108.00	AXA.GB	054536AA5	GACC	06/07/2012	11:54:22	100	C(B)	112.05	3.75%	\$	820.80
259	06/07/2012	11:56:30	100	BD(S)	82.50	BBV.GD	055291AC2	GACC	06/07/2012	11:55:57	100	C(B)	85.75	3.94%	\$	700.75
260	06/07/2012	12:08:04	100	BD(S)	82.25	UNCF.AB	90466MAC3	GACC	06/07/2012	12:15:32	100	C(B)	85.50	3.95%	\$	766.05
261	06/12/2012	11:03:15	126	C(S)	77.97	UNCF.AB	90466MAC3	GACC	06/12/2012	11:00:58	126	BD(B)	81.00	3.74%	\$	3,174.82
262	06/21/2012	11:06:41	100	BD(S)	118.00	MT.AG	03938LAM6	GACC	06/21/2012	11:13:56	100	C(B)	122.25	3.60%	\$	1,252.80
263	06/25/2012	15:19:10	55	C(S)	94.50	GNW.JP	37247DAN6	GACC	06/25/2012	15:18:49	55	BD(B)	97.75	3.32%	\$	876.91
264	06/25/2012	13:37:24	72	BD(S)	118.03	MT.AG	03938LAM6	GACC	06/25/2012	13:39:53	72	C(B)	122.53	3.81%	\$	1,081.47
265	06/25/2012	14:38:47	20	BD(S)	118.00	MT.AG	03938LAM6	GACC	06/25/2012	14:42:09	20	C(B)	122.50	3.81%	\$	300.56
266	06/26/2012	13:28:01	60	BD(S)	117.84	MT.AG	03938LAM6	GACC	06/26/2012	13:25:30	60	C(B)	122.09	3.61%	\$	754.12
267	06/29/2012	14:48:00	75	BD(S)	83.25	BBV.GD	055291AC2	GACC	06/29/2012	14:55:53	75	C(B)	86.40	3.78%	\$	483.38
268	02/09/2012	14:26:07	48	BD(S)	106.75	AXA.GB	054536AA5	GACC						3.75%		
					106.75	AXA.GB	054536AA5	GACC	02/09/2012	14:37:52	17	C(B)	110.75	3.75%	\$	168.24
					106.75	AXA.GB	054536AA5	GACC	02/09/2012	14:38:43	12	C(B)	110.75	3.75%	\$	80.00
269	02/22/2012	16:07:35	124	BD(S)	108.15	AXA.GB	054536AA5	GACC						3.70%		
					108.15	AXA.GB	054536AA5	GACC	02/22/2012	16:12:59	31	C(B)	112.15	3.70%	\$	267.73
					108.15	AXA.GB	054536AA5	GACC	02/22/2012	16:14:28	56	C(B)	112.15	3.70%	\$	483.64
					108.15	AXA.GB	054536AA5	GACC	02/22/2012	16:13:41	28	C(B)	112.15	3.70%	\$	241.82
270	03/01/2012	10:10:00	175	BD(S)	89.50	UNCF.AB	90466MAC3	GACC						3.63%		
					89.50	UNCF.AB	90466MAC3	GACC	03/01/2012	10:11:59	25	C(B)	92.75	3.63%	\$	177.05
					89.50	UNCF.AB	90466MAC3	GACC	03/01/2012	10:12:29	150	C(B)	92.75	3.63%	\$	1,062.30
271	03/01/2012	14:14:15	100	BD(S)	105.00	TI.GV	872456AA8	GACC						3.10%		
					105.00	TI.GV	872456AA8	GACC	03/01/2012	14:20:03	50	C(B)	108.25	3.10%	\$	417.50
					105.00	TI.GV	872456AA8	GACC	03/01/2012	14:21:07	50	C(B)	108.25	3.10%	\$	417.50
272	03/08/2012	16:15:24	160	BD(S)	106.00	TI.GV	872456AA8	GACC						3.22%		
					106.00	TI.GV	872456AA8	GACC	03/08/2012	16:14:24	60	C(B)	109.75	3.22%	\$	787.20
					106.00	TI.GV	872456AA8	GACC	03/08/2012	16:16:55	60	C(B)	109.25	3.22%	\$	487.20
					106.00	TI.GV	872456AA8	GACC	03/08/2012	16:15:31	60	C(B)	109.25	3.22%	\$	487.20
273	03/15/2012	12:44:00	697	BD(S)	101.25	JEF.GJ	472319AH5	GACC						3.77%		
					101.25	JEF.GJ	472319AH5	GACC	03/15/2012	12:50:21	63	C(B)	105.10	3.77%	\$	524.63
					101.25	JEF.GJ	472319AH5	GACC	03/15/2012	13:02:51	38	C(B)	105.10	3.77%	\$	316.44
					101.25	JEF.GJ	472319AH5	GACC	03/15/2012	13:04:04	18	C(B)	105.00	3.77%	\$	131.89
					101.25	JEF.GJ	472319AH5	GACC	03/15/2012	13:05:50	32	C(B)	105.10	3.77%	\$	266.48
					101.25	JEF.GJ	472319AH5	GACC	03/15/2012	13:06:40	17	C(B)	105.10	3.77%	\$	141.57
					101.25	JEF.GJ	472319AH5	GACC	03/15/2012	12:52:49	147	C(B)	105.00	3.77%	\$	1,077.14
					101.25	JEF.GJ	472319AH5	GACC	03/15/2012	12:55:24	87	C(B)	105.10	3.77%	\$	724.49

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274	05/07/2012	12:30:28	130	BD(S)	DRYS.GA	262498AB4	GACC	03/15/2012	12:56:26	31	C(B)	105.10	3.77%	\$	258.15
					DRYS.GA	262498AB4	GACC								
275	07/05/2012	10:16:32	100	BD(S)	DRYS.GA	262498AB4	GACC	07/05/2012	10:19:59	100	C(B)	78.25	3.64%	\$	651.10
276	07/06/2012	10:50:49	130	BD(S)	DRYS.GA	262498AB4	GACC	07/06/2012	10:43:30	130	C(B)	79.75	3.57%	\$	792.22
277	07/06/2012	12:03:47	25	BD(S)	DRYS.GA	262498AB4	GACC	07/06/2012	12:16:06	25	C(B)	78.85	3.75%	\$	184.30
278	07/10/2012	16:24:00	150	BD(S)	BBV.GD	055291AC2	GACC	07/10/2012	16:27:59	150	C(B)	89.375	3.77%	\$	999.37
279	07/16/2012	16:28:12	100	BD(S)	TLGT	87927VAU2	GACC	07/16/2012	16:32:53	100	C(B)	107.375	3.12%	\$	1,250.80
280	07/17/2012	14:37:21	31	BD(S)	MT.AG	03938LAM6	GACC	07/17/2012	14:30:31	31	C(B)	126.21	3.74%	\$	343.18
281	07/18/2012	11:31:25	56	BD(S)	MS.HHO	61747YCG8	GACC	07/18/2012	11:51:37	56	C(B)	116.69	3.78%	\$	1,259.20
282	07/18/2012	11:32:49	52	BD(S)	MT.AG	03938LAM6	GACC	07/18/2012	11:53:08	52	C(B)	126.625	3.68%	\$	542.81
283	07/18/2012	15:59:34	30	C(S)	MT3824016	03938LAX2	GACC	07/18/2012	15:58:52	30	BD(B)	101.70	3.20%	\$	575.00
284	07/19/2012	12:06:34	200	BD(S)	SWY.GN	786514BA6	GACC	07/19/2012	12:09:18	200	C(B)	105.85	3.47%	\$	1,678.10
285	07/20/2012	14:49:15	15	C(S)	GNW.JP	37247DAN6	GACC	07/20/2012	14:48:38	15	BD(B)	98.75	3.29%	\$	87.50
286	08/06/2012	14:11:47	30	BD(S)	JEF.GJ	472319AH5	GACC	08/06/2012	14:12:45	30	C(B)	107.35	3.72%	\$	211.08
287	08/06/2012	14:17:38	30	BD(S)	MS.WA	61746BCY0	GACC	08/06/2012	14:22:24	30	C(B)	110.81	3.70%	\$	377.14
288	08/10/2012	14:31:00	70	BD(S)	XCO.AB	269279AD7	GACC	08/10/2012	14:30:22	70	C(B)	95.375	3.81%	\$	494.90
289	08/13/2012	13:14:00	30	BD(S)	CBB.GS	171871AM8	GACC	08/13/2012	13:32:24	30	C(B)	104.25	3.73%	\$	353.16
290	08/13/2012	16:02:36	35	BD(S)	MS.WA	61746BCY0	GACC	08/13/2012	16:07:18	35	C(B)	109.138	3.78%	\$	472.87
291	08/13/2012	16:12:24	35	BD(S)	MS.OQ	61746HD4	GACC	08/13/2012	16:16:01	35	C(B)	117.70	3.70%	\$	480.85
292	08/20/2012	14:30:00	100	BD(S)	BAC3730605	339915AH4	GACC	08/20/2012	14:30:37	100	C(B)	110.95	3.50%	\$	1,284.40
293	08/20/2012	14:36:39	50	BD(S)	TEF.GO	87939WAC7	GACC	08/20/2012	14:37:21	50	C(B)	97.89	3.98%	\$	425.24
294	08/23/2012	12:40:04	31	BD(S)	GNW.JO	37247DAM8	GACC	08/23/2012	12:24:47	31	C(B)	106.53	3.85%	\$	283.23
295	08/23/2012	16:00:07	100	BD(S)	BAC3730605	339915AH4	GACC	08/23/2012	15:59:08	100	C(B)	112.25	3.46%	\$	1,254.50
296	08/23/2012	16:25:20	100	BD(S)	TEF.GO	87939WAC7	GACC	08/23/2012	16:28:32	100	C(B)	96.625	3.48%	\$	739.21
297	08/27/2012	11:48:31	150	BD(S)	UNCF.AB	90466MAC3	GACC	08/27/2012	11:58:31	150	C(B)	90.375	3.73%	\$	1,124.27
298	08/27/2012	16:16:25	250	BD(S)	UBS3889053	90261AAB8	GACC	08/27/2012	16:17:17	250	C(B)	104.22	3.48%	\$	2,329.10
299	08/28/2012	15:03:35	40	BD(S)	UNCF.AB	90466MAC3	GACC	08/28/2012	15:08:03	40	C(B)	90.50	3.72%	\$	298.37
300	08/29/2012	13:01:50	30	BD(S)	MS.WA	61746BCY0	GACC	08/29/2012	13:02:03	30	C(B)	108.75	3.57%	\$	413.10
301	08/29/2012	13:01:03	50	BD(S)	UBS3889053	90261AAB8	GACC	08/29/2012	13:03:34	50	C(B)	104.67	3.72%	\$	875.69
302	08/29/2012	13:05:31	194	C(S)	UNCF.AB	90466MAC3	GACC	08/29/2012	13:05:31	194	BD(B)	86.50	3.93%	\$	3,004.87
303	08/29/2012	13:07:29	43	C(S)	JEF.GJ	472319AH5	GACC	08/29/2012	13:07:29	43	BD(B)	106.90	3.84%	\$	466.73
304	08/30/2012	11:34:14	30	C(S)	GNW.AA	37247DAP1	GACC	08/30/2012	11:34:14	30	BD(B)	102.125	3.67%	\$	236.51
305	08/30/2012	11:35:39	47	C(S)	BBV.GD	055291AC2	GACC	08/30/2012	11:35:39	47	BD(B)	93.50	3.80%	\$	407.28
306	08/30/2012	15:35:40	50	BD(S)	UBS3889053	90261AAB8	GACC	08/30/2012	15:34:21	50	C(B)	105.00	3.96%	\$	1,000.10
307	09/04/2012	15:55:56	325	C(S)	GNW.JP	37247DAN6	GACC	09/04/2012	15:55:56	325	BD(B)	101.00	3.71%	\$	4,966.00
308	09/05/2012	13:56:00	150	BD(S)	UNCF.AB	90466MAC3	GACC	09/05/2012	15:24:36	150	C(B)	91.30	3.75%	\$	1,161.60

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309	09/05/2012	16:08:00	20	BD(S)	89.00	UNCF.AB	90466MAC3	GACC	09/05/2012	16:11:22	20	C(B)	92.25	3.65%	\$	139.14
310	09/07/2012	13:05:43	17	BD(S)	103.00	UBS3889053	90261AAB8	GACC	09/07/2012	13:07:49	17	C(B)	106.80	3.69%	\$	134.71
311	09/12/2012	10:59:08	70	BD(S)	114.75	MT.AG	09388LAM6	GACC	09/12/2012	11:10:41	70	C(B)	119.25	3.92%	\$	788.44
312	09/13/2012	13:24:00	200	BD(S)	103.80	UBS3889053	90261AAB8	GACC	09/13/2012	13:21:28	200	C(B)	107.55	3.61%	\$	1,957.08
313	09/14/2012	12:35:11	147	C(S)	102.50	GNW.JO	37247DAM8	GACC	09/14/2012	12:35:11	147	BD(B)	106.75	3.98%	\$	2,183.21
314	09/14/2012	12:38:22	132	C(S)	103.25	SWY.GN	786514BA6	GACC	09/14/2012	12:38:22	132	BD(B)	107.50	3.95%	\$	3,963.96
315	09/14/2012	12:40:53	56	C(S)	111.70	MS.HHO	61747YCG8	GACC	09/14/2012	12:40:53	56	BD(B)	116.20	3.87%	\$	1,133.97
316	09/14/2012	14:15:00	200	BD(S)	105.00	UBS3889053	90261AAB8	GACC	09/14/2012	14:23:34	200	C(B)	108.75	3.57%	\$	1,893.00
317	09/17/2012	10:30:00	100	BD(S)	105.125	UBS3889053	90261AAB8	GACC	09/17/2012	10:39:58	100	C(B)	109.125	3.81%	\$	1,193.16
318	09/17/2012	11:17:31	29	BD(S)	84.00	DRYS.GA	262498AB4	GACC	09/17/2012	11:21:52	29	C(B)	87.00	3.57%	\$	265.87
319	09/20/2012	13:13:29	250	BD(S)	104.875	UBS3889053	90261AAB8	GACC	09/20/2012	13:17:06	250	C(B)	108.925	3.86%	\$	2,783.75
320	09/21/2012	11:32:29	55	BD(S)	108.10	TEF.GH	879385AD4	GACC	09/21/2012	11:37:42	55	C(B)	112.35	3.99%	\$	613.31
321	09/21/2012	14:15:25	14	BD(S)	107.75	TEF.GH	879385AD4	GACC	09/21/2012	14:30:55	14	C(B)	112.00	3.94%	\$	157.54
322	09/21/2012	16:07:49	20	BD(S)	109.125	AGO.GA	04621WA48	GACC	09/21/2012	16:11:22	20	C(B)	113.125	3.67%	\$	221.64
323	09/24/2012	12:31:43	35	BD(S)	104.75	UBS3889053	90261AAB8	GACC	09/24/2012	12:34:24	35	C(B)	108.75	3.82%	\$	329.46
324	09/24/2012	13:24:42	80	BD(S)	92.94	TI.GL	87927VAF5	GACC	09/24/2012	13:29:52	80	C(B)	96.44	3.77%	\$	569.44
325	09/24/2012	15:22:55	45	BD(S)	107.75	TEF.GH	879385AD4	GACC	09/24/2012	15:26:48	45	C(B)	111.75	3.71%	\$	393.86
326	09/25/2012	09:46:03	17	BD(S)	98.25	BPV.GD	05529TAC2	GACC	09/25/2012	09:48:19	17	C(B)	102.00	3.82%	\$	138.10
327	09/25/2012	11:45:08	60	BD(S)	92.75	TI.GL	87927VAF5	GACC	09/25/2012	11:50:31	60	C(B)	96.50	4.04%	\$	580.50
328	09/25/2012	15:45:09	16	BD(S)	104.625	UBS3889053	90261AAB8	GACC	09/25/2012	15:49:14	16	C(B)	108.525	3.73%	\$	135.19
329	09/25/2012	16:33:53	22	BD(S)	94.25	UNCF.AB	90466MAC3	GACC	09/25/2012	16:33:53	22	C(B)	97.75	3.71%	\$	174.91
330	09/25/2012	16:35:28	22	BD(S)	94.25	UNCF.AB	90466MAC3	GACC	09/25/2012	16:33:53	22	C(B)	97.75	3.71%	\$	174.91
331	07/26/2012	10:31:18	177	BD(S)	105.50	SWY.GN	786514BA6	GACC								
					105.5	SWY.GN	786514BA6	GACC	07/26/2012	10:34:45	87	C(B)	109.25	3.55%	\$	573.20
					105.5	SWY.GN	786514BA6	GACC	07/26/2012	10:34:45	90	C(B)	109.55	3.84%	\$	862.96
	08/17/2012	11:36:00	300	BD(S)	101.625	GNW.JO	37247DAM8	GACC								
					101.625	GNW.JO	37247DAM8	GACC	08/17/2012	11:26:21	150	C(B)	105.755	4.06%	\$	1,682.85
					101.625	GNW.JO	37247DAM8	GACC	08/17/2012	11:27:55	23	C(B)	105.725	4.03%	\$	251.14
					101.625	GNW.JO	37247DAM8	GACC	08/17/2012	11:27:55	18	C(B)	105.675	3.99%	\$	187.54
332					101.625	GNW.JO	37247DAM8	GACC	08/17/2012	11:27:55	19	C(B)	105.675	3.99%	\$	197.96
					101.625	GNW.JO	37247DAM8	GACC	08/17/2012	11:27:55	36	C(B)	105.775	4.08%	\$	411.08
					101.625	GNW.JO	37247DAM8	GACC	08/17/2012	11:27:55	28	C(B)	105.775	4.08%	\$	319.73
					101.625	GNW.JO	37247DAM8	GACC	08/17/2012	11:27:55	11	C(B)	106.40	4.70%	\$	125.25
333	08/28/2012	11:59:02	63	BD(S)	87.125	UNCF.AB	90466MAC3	GACC								
					87.125	UNCF.AB	90466MAC3	GACC	08/28/2012	12:06:31	53	C(B)	90.375	3.73%	\$	397.24
					100.875	UBS3889053	90261AAB8	GACC	08/28/2012	14:50:50	30	C(B)	104.625	3.72%	\$	323.04
					100.875	UBS3889053	90261AAB8	GACC	08/28/2012	14:50:50	30	C(B)	104.625	3.72%	\$	323.04
					100.875	UBS3889053	90261AAB8	GACC	08/28/2012	14:50:50	40	C(B)	104.625	3.72%	\$	430.73
334					100.875	UBS3889053	90261AAB8	GACC	08/28/2012	14:50:50	85	C(B)	104.625	3.72%	\$	915.29
					100.875	UBS3889053	90261AAB8	GACC	08/28/2012	14:50:50	100	C(B)	104.625	3.72%	\$	1,076.81

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335	08/28/2012	16:18:32	225	BD(S)	100.875	UBS3889053	90261AAB8	GACC	08/28/2012	14:50:50	30	C(B)	104.825	3.72%	\$ 323.04
					100.875	UBS3889053	90261AAB8	GACC	08/28/2012	14:50:50	100	C(B)	104.825	3.72%	\$ 1,076.81
336	08/29/2012	12:17:02	75	BD(S)	87.25	UNCF.AB	90469MAC3	GACC	08/29/2012	12:14:09	15	C(B)	90.50	3.72%	\$ 87.50
					87.25	UNCF.AB	90469MAC3	GACC	08/29/2012	12:14:09	30	C(B)	90.50	3.72%	\$ 223.78
337	09/12/2012	11:00:10	84	BD(S)	104.875	SWY.GN	786514BA6	GACC	09/12/2012	11:13:41	33	C(B)	108.925	3.86%	\$ 305.16
					104.875	SWY.GN	786514BA6	GACC	09/12/2012	11:13:41	30	C(B)	108.875	3.81%	\$ 262.42
338	09/12/2012	11:01:02	112	BD(S)	104.875	SWY.GN	786514BA6	GACC	09/12/2012	11:13:41	21	C(B)	108.825	3.77%	\$ 173.19
					103.75	UBS3889053	90261AAB8	GACC	09/12/2012	11:11:52	78	C(B)	107.82	3.92%	\$ 1,013.90
339	09/12/2012	15:00:27	73	BD(S)	114.699	MT.AG	03938LAM6	GACC	09/12/2012	11:11:52	34	C(B)	107.75	3.86%	\$ 418.16
					114.699	MT.AG	03938LAM6	GACC	09/12/2012	15:21:30	28	C(B)	119.109	3.84%	\$ 290.60
340	09/12/2012	14:31:15	470	BD(S)	103.875	UBS3889053	90261AAB8	GACC	09/12/2012	15:49:34	35	C(B)	119.149	3.89%	\$ 377.25
					103.875	UBS3889053	90261AAB8	GACC	09/12/2012	14:35:54	50	C(B)	107.375	3.37%	\$ 363.27
341	09/18/2012	15:41:11	170	BD(S)	99.072	CLF.AD	18683KAD3	GACC	09/18/2012	15:46:22	70	C(B)	102.952	3.92%	\$ 704.84
					99.072	CLF.AD	18683KAD3	GACC	09/18/2012	15:46:22	100	C(B)	102.952	3.92%	\$ 1,006.91
342	09/19/2012	10:23:00	120	BD(S)	93.50	NMLAK	639365AF2	GACC	09/19/2012	10:37:46	35	C(B)	97.25	4.01%	\$ 343.84
					93.5	NMLAK	639365AF2	GACC	09/19/2012	10:37:46	35	C(B)	97.25	4.01%	\$ 343.84
343	09/19/2012	10:26:58	490	BD(S)	104.75	UBS3889053	90261AAB8	GACC	09/19/2012	10:37:46	25	C(B)	97.25	4.01%	\$ 245.60
					104.75	UBS3889053	90261AAB8	GACC	09/19/2012	10:37:46	25	C(B)	97.25	4.01%	\$ 245.60
	09/19/2012	15:13:12	460	BD(S)	104.75	UBS3889053	90261AAB8	GACC	09/19/2012	10:31:18	100	C(B)	108.75	3.82%	\$ 1,203.18
					104.75	UBS3889053	90261AAB8	GACC	09/19/2012	10:31:18	100	C(B)	108.75	3.82%	\$ 1,203.18
	09/19/2012	15:13:12	460	BD(S)	104.75	UBS3889053	90261AAB8	GACC	09/19/2012	10:31:18	100	C(B)	108.75	3.82%	\$ 1,203.18
					104.75	UBS3889053	90261AAB8	GACC	09/19/2012	10:31:18	150	C(B)	108.75	3.82%	\$ 1,804.76

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344									UBS3889053	90261AAB8	GACC	09/19/2012	15:21:55	200	C(B)	108.50	3.58%	\$ 1,906.35	
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:21:55	75	C(B)	108.50	3.58%	\$ 714.88		
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:21:55	40	C(B)	108.50	3.58%	\$ 381.27		
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:21:55	35	C(B)	108.50	3.58%	\$ 335.61		
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:21:55	25	C(B)	108.50	3.58%	\$ 238.29		
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:21:55	25	C(B)	108.50	3.58%	\$ 238.29		
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:21:55	20	C(B)	108.50	3.58%	\$ 190.64		
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:29:54	20	C(B)	108.50	3.58%	\$ 190.64		
		104.75						UBS3889053	90261AAB8	GACC	09/19/2012	15:31:28	20	C(B)	108.50	3.58%	\$ 190.64		
								NMAK	639865AF2	GACC									
345		93.25	BD(S)	58				NMAK	639865AF2	GACC	09/19/2012	16:06:46	52	C(B)	96.75	3.75%	\$ 375.00		
		93.25						NMAK	639865AF2	GACC									
346		93.125	BD(S)	43				NMAK	639865AF2	GACC	09/25/2012	10:57:39	35	C(B)	96.715	3.86%	\$ 285.21		
		93.125						NMAK	639865AF2	GACC									
347		101.500	BD(S)	200				UNCF-AB	90468MAC3	GACC	04/01/2013	11:11:17	200	C(B)	104.750	3.202%	\$ 2,480.60		
		112.000						RIG.GX	893830AT6	GACC	04/01/2013	13:52:00	25	C(B)	116.200	3.75%	\$ 347.20		
348		79.178	BD(S)	15				SVU3708771	013104AC8	GACC	04/03/2013	10:33:25	15	C(B)	82.428	4.1047%	\$ 87.50		
349		79.500	BD(S)	40				SVU3708771	013104AC8	GACC	04/10/2013	14:29:00	40	C(B)	82.500	3.7736%	\$ 363.66		
350		79.500	BD(S)	30				SVU3708771	013104AC8	GACC	04/12/2013	14:03:25	30	C(B)	82.500	3.7736%	\$ 272.74		
351		101.375	BD(S)	100				CTL3705103	912920AC9	GACC	04/15/2013	13:37:00	100	C(B)	104.625	3.2059%	\$ 1,100.85		
352		101.375	BD(S)	25				CTL3705103	912920AC9	GACC	04/16/2013	12:39:00	25	C(B)	104.625	3.2059%	\$ 275.21		
353		101.350	BD(S)	130				CTL3705103	912920AC9	GACC	04/16/2013	12:54:00	130	C(B)	104.850	3.4534%	\$ 1,756.79		
354		126.500	BD(S)	30				TEF.GH	879385AD4	GACC	04/23/2013	12:01:19	30	C(B)	131.500	3.9526%	\$ 608.17		
355		106.250	BD(S)	100				TOK.GR	878742AW5	GACC	04/25/2013	14:50:58	100	C(B)	109.500	3.0588%	\$ 1,836.87		
356		107.180	BD(S)	100				TOK.GR	878742AW5	GACC	04/25/2013	15:41:14	100	C(B)	110.430	3.0323%	\$ 1,824.51		
357		113.725	BD(S)	30				LO.GE	544152AE1	GACC	05/14/2013	14:37:37	30	C(B)	118.115	3.8602%	\$ 549.36		
358		115.250	BD(S)	29				PBR.GT	71645WAQ4	GACC	05/23/2013	16:25:20	29	C(B)	119.560	3.7397%	\$ 447.76		
359		103.500	BD(S)	180				BCS3990764	06739FHK0	GACC	05/24/2013	09:41:09	180	C(B)	108.750	3.1401%	\$ 2,012.22		
360		111.426	BD(S)	40				TI.GS	87927VAV0	GACC	05/24/2013	11:52:30	40	C(B)	115.596	3.7424%	\$ 598.31		
361		103.500	BD(S)	25				BCS3990764	06739FHK0	GACC	05/24/2013	11:54:46	25	C(B)	107.180	3.5556%	\$ 386.97		
362		103.500	BD(S)	200				BCS3990764	06739FHK0	GACC	05/28/2013	10:47:35	200	C(B)	106.750	3.1401%	\$ 2,235.80		
363		118.250	BD(S)	16				LO.GE	544152AE1	GACC	05/28/2013	13:20:00	16	C(B)	122.500	3.5941%	\$ 254.30		
364		103.500	BD(S)	70				BCS3990764	06739FHK0	GACC	05/28/2013	13:32:00	70	C(B)	107.000	3.3816%	\$ 957.53		
365		108.750	BD(S)	160				AA.GI	022248AU0	GACC	05/29/2013	15:20:43	160	C(B)	113.250	4.1379%	\$ 3,285.00		
366		102.450	BD(S)	75				BCS3990764	06739FHK0	GACC	05/29/2013	14:23:35	75	C(B)	105.700	3.1723%	\$ 854.65		
367		101.500	BD(S)	30				BCS3990764	06739FHK0	GACC	06/04/2013	10:00:58	30	C(B)	105.000	3.4483%	\$ 422.73		
368		101.375	BD(S)	50				BCS3990764	06739FHK0	GACC	06/04/2013	15:52:42	50	C(B)	104.875	3.4525%	\$ 705.84		
369		99.375	BD(S)	20				BCS3990764	06739FHK0	GACC	06/13/2013	11:08:28	20	C(B)	101.625	3.3037%	\$ 244.70		
370		90.432	C(S)	400				CTL3705103	912920AC9	GACC	06/25/2013	14:31:58	400	BD(B)	94.432	4.2359%	\$ 5,272.52		
371		101.313	BD(S)	157				CTL3705103	912920AC9	GACC									
		101.313						CTL3705103	912920AC9	GACC	04/12/2013	14:18:00	75	C(B)	104.563	3.207881%	\$ 826.82		
372		101.313						CTL3705103	912920AC9	GACC	04/12/2013	14:18:00	60	C(B)	104.563	3.207881%	\$ 661.30		

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373	04/24/2013	14:59:00	87		BD(S)	126.660	TEF.GH	879385AD4	GACC	04/24/2013	15:04:00	75			C(B)	131.416	3.754934%	\$	1,334.62
						126.660	TEF.GH	879385AD4	GACC										
374	05/10/2013	15:39:09	492		BD(S)	113.500	LO.GE	544152AE1	GACC	05/10/2013	15:43:05	136			C(B)	118.000	3.964758%	\$	2,646.90
						113.500	LO.GE	544152AE1	GACC	05/10/2013	15:43:05	35			C(B)	118.000	3.964758%	\$	681.19
						113.500	LO.GE	544152AE1	GACC	05/10/2013	15:45:14	300			C(B)	117.250	3.303965%	\$	3,588.75
375	05/13/2013	09:57:00	42		BD(S)	113.250	LO.GE	544152AE1	GACC										
						113.250	LO.GE	544152AE1	GACC	05/13/2013	09:58:40	16			C(B)	117.500	3.752759%	\$	272.30
						113.250	LO.GE	544152AE1	GACC	05/13/2013	09:58:40	13			C(B)	117.500	3.752759%	\$	221.24
						113.250	LO.GE	544152AE1	GACC	05/13/2013	09:58:40	13			C(B)	117.500	3.752759%	\$	221.24
376	05/13/2013	12:48:03	45		BD(S)	82.500	MCP3890864	608753AF6	GACC										
						82.500	MCP3890864	608753AF6	GACC	05/13/2013	12:48:03	25			C(B)	85.750	3.939394%	\$	247.38
RESTITUTION																			
																			\$ 333,083.26

* Contra parties are identified as follows: B-D (S) indicates another Broker-Dealer selling to the firm; B-D (B) indicates another Broker-Dealer buying from the firm; C (S) indicates a customer selling to the firm; and C (B) indicates a customer buying from the firm.