

WallachBeth Capital - Held NMS Stocks and Options Order Routing Public Report

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2nd Quarter, 2020

April 2020

S&P 500 Stocks

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
| | | | | | | | | | | | | | |

Material Aspects:

April 2020

Non-S&P 500 Stocks

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
| | | | | | | | | | | | | | |

Material Aspects:

April 2020

Options

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 100.00 | 0.24 | 10.38 | 6.84 | 82.55 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
| BOFA SECURITIES INC. - BCEX | 75.00 | 0.00 | 68.18 | 72.41 | 76.29 | 0.0000 | 0.0000 | 493.0000 | 8.0353 | 1,153.0000 | 8.0353 | 5,077.0000 | 8.0353 |
| PTR | 10.14 | 0.00 | 0.00 | 0.00 | 12.29 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| BZXL | 5.19 | 0.00 | 31.82 | 27.59 | 0.00 | 0.0000 | 0.0000 | -827.0000 | -22.0859 | -289.0000 | -22.0859 | 0.0000 | 0.0000 |
| TRADEZERO AMERICA INC. - ZERO | 3.07 | 100.00 | 0.00 | 0.00 | 3.43 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| MATRIX EXECUTIONS - REDG | 2.59 | 0.00 | 0.00 | 0.00 | 3.14 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 29.0000 | 3.9252 |
| DASH FINANCIAL LLC - DFIN | 1.89 | 0.00 | 0.00 | 0.00 | 2.29 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 17.0000 | 1.6325 |
| WALL STREET ACCESS - WALL | 1.18 | 0.00 | 0.00 | 0.00 | 1.43 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| DEPAOLA | 0.94 | 0.00 | 0.00 | 0.00 | 1.14 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

Material Aspects:

BOFA SECURITIES INC. - BCEX:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to BOFA SECURITIES INC - BCEX and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

PTR:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to PTR-Phlx and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

BZXL:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to BZXL and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

TRADEZERO AMERICA INC. - ZERO:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to TradeZero and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

MATRIX EXECUTIONS - REDG:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to MATRIX EXECUTIONS - REDG and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

DASH FINANCIAL LLC - DFIN:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to DFIN and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

WALL STREET ACCESS - WALL:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to WALL STREET ACCESS - WALL and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

DEPAOLA:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to Depoala and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

May 2020

S&P 500 Stocks

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|

Material Aspects:

May 2020

Non-S&P 500 Stocks

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|

Material Aspects:

May 2020

Options

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 100.00 | 0.00 | 13.31 | 7.74 | 78.95 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
| BOFA SECURITIES INC. - BCEX | 42.11 | 0.00 | 76.74 | 96.00 | 30.98 | 0.0000 | 0.0000 | -841.0000 | -5.7538 | -617.0000 | -5.7538 | -650.0000 | -5.7538 |
| MATRIX EXECUTIONS - REDG | 30.03 | 0.00 | 0.00 | 0.00 | 38.04 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 179.0000 | 0.3446 |
| XFA CBOE | 8.67 | 0.00 | 0.00 | 0.00 | 10.98 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| PTR | 8.36 | 0.00 | 0.00 | 0.00 | 10.59 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| DEPAOLA | 3.72 | 0.00 | 0.00 | 0.00 | 4.71 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| VOLANT LIQUIDITY LLC - BZXL | 2.48 | 0.00 | 18.60 | 0.00 | 0.00 | 0.0000 | 0.0000 | 24.0000 | 1.8113 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| DASH FINANCIAL LLC - DFIN | 2.17 | 0.00 | 4.65 | 4.00 | 1.57 | 0.0000 | 0.0000 | 26.0000 | 1.5400 | 1.0000 | 1.5400 | 169.0000 | 1.5400 |
| TRADEZERO AMERICA INC. - ZERO | 1.24 | 0.00 | 0.00 | 0.00 | 1.57 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| WALL STREET ACCESS - WALL | 0.62 | 0.00 | 0.00 | 0.00 | 0.78 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| TJM CBOE | 0.62 | 0.00 | 0.00 | 0.00 | 0.78 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

Material Aspects:

BOFA SECURITIES INC. - BCEX:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to BOFA SECURITIES INC. - BCEX and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

MATRIX EXECUTIONS - REDG:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to MATRIX EXECUTIONS - REDG and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

XFA CBOE:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to XFA and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

PTR:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to PTR-Phx and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

DEPAOLA:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to Depoala and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

VOLANT LIQUIDITY LLC - BZXL:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to Volant and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

DASH FINANCIAL LLC - DFIN:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to DFIN and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

TRADEZERO AMERICA INC. - ZERO:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to TradeZero and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

WALL STREET ACCESS - WALL:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to WALL STREET ACCESS - WALL and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

TJM CBOE:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to TJM CBOE and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

June 2020

S&P 500 Stocks

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
| | | | | | | | | | | | | | |

Material Aspects:

June 2020

Non-S&P 500 Stocks

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
| | | | | | | | | | | | | | |

Material Aspects:

June 2020

Options

Summary

| Non-Directed Orders as % of All Orders | Market Orders as % of Non-Directed Orders | Marketable Limit Orders as % of Non-Directed Orders | Non-Marketable Limit Orders as % of Non-Directed Orders | Other Orders as % of Non-Directed Orders |
|--|---|---|---|--|
| 100.00 | 0.00 | 15.40 | 8.71 | 75.89 |

Venues

| Venue - Non-directed Order Flow | Non-Directed Orders (%) | Market Orders (%) | Marketable Limit Orders (%) | Non-Marketable Limit Orders (%) | Other Orders (%) | Net Payment Paid/Received for Market Orders(USD) | Net Payment Paid/Received for Market Orders(cents per hundred shares) | Net Payment Paid/Received for Marketable Limit Orders(USD) | Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Non-Marketable Limit Orders(USD) | Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares) | Net Payment Paid/Received for Other Orders(USD) | Net Payment Paid/Received for Other Orders(cents per hundred shares) |
|---------------------------------|-------------------------|-------------------|-----------------------------|---------------------------------|------------------|--|---|--|---|--|---|---|--|
| BOFA SECURITIES INC. - BCEX | 28.79 | 0.00 | 63.77 | 64.10 | 17.65 | 0.0000 | 0.0000 | 863.0000 | 4.7461 | 388.0000 | 4.7461 | 244.0000 | 4.7461 |
| PTR | 24.55 | 0.00 | 4.35 | 2.56 | 31.18 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| DEPAOLA | 14.73 | 0.00 | 0.00 | 0.00 | 19.41 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| MATRIX EXECUTIONS - REDG | 12.72 | 0.00 | 0.00 | 0.00 | 16.76 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 31.0000 | 0.2161 |
| VOLANT LIQUIDITY LLC - BZXL | 7.81 | 0.00 | 31.88 | 33.33 | 0.00 | 0.0000 | 0.0000 | 368.0000 | 9.7309 | 517.0000 | 9.7309 | 0.0000 | 0.0000 |
| TRADEZERO AMERICA INC. - ZERO | 7.14 | 0.00 | 0.00 | 0.00 | 9.41 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| STUDENT | 1.79 | 0.00 | 0.00 | 0.00 | 2.35 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| WALL STREET ACCESS - WALL | 1.12 | 0.00 | 0.00 | 0.00 | 1.47 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| CHBC | 0.45 | 0.00 | 0.00 | 0.00 | 0.59 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |
| TJM CBOE | 0.45 | 0.00 | 0.00 | 0.00 | 0.59 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 | 0.0000 |

Material Aspects:

BOFA SECURITIES INC. - BCEX:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to BOFA SECURITIES INC. - BCEX and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

PTR:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to PTR-Phlx and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

DEPAOLA:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to Depoala and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

MATRIX EXECUTIONS - REDG:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to MATRIX EXECUTIONS - REDG and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

VOLANT LIQUIDITY LLC - BZXL:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to Volant and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

TRADEZERO AMERICA INC. - ZERO:

Wallach Beth (WB) pays exchange, regulatory, market data and clearing fees to TradeZero and receives exchange rebates as credits where applicable WB also receives incremental pricing benefits if certain volume thresholds are met.

STUDENT:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to STUDENT and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

WALL STREET ACCESS - WALL:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to WALL STREET ACCESS - WALL and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

CHBC:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to CHBC and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met

TJM CBOE:

WallachBeth Capital pays exchange, regulatory, market data and clearing fees to TJM CBOE and receives exchange rebates as credits where applicable WallachBeth Capital also receives incremental pricing benefits if certain volume thresholds are met