

## **SR-OCC-2024-001 – OCC; Order Instituting proceedings to determine whether to approve or disapprove a proposed rule change – adjusting certain parameters in calculating margin requirements during high volatility**

Dear Sherry R. Haywood & SEC Staff,

Thank you for considering public comment and taking a more discerning approach to rules proposed by Self-regulatory organisations. I want to state upfront that as a public member I disapprove of the OCC's rule proposal in its entirety and hope the Commission disapproves the change.

### **To supplement this comment, I have also added a multitude of market mechanics and misconduct allegedly permitted by Self-regulatory organisations including the OCC for the reader's benefit.**

There are 2 main components to my disapproval of the proposed rule. One is the absolute lack of transparency provided by the OCC in regard to the specific changes & full impact these changes will have on calculating margin requirements. This is most clearly displayed by referral to exhibit 5 in the rule proposal that are simply 5 BLANK pages. This cannot be considered sufficient disclosure to classify this rule proposal as having had appropriate public comments/discussion. The current discussion relies on vague descriptors by the rule writing party without any ability to offer accurate or meaningful criticism. I hope the Commission has received more information than what is displayed to the public & that the Commission clearly understands & accepts liability for the changes the OCC is making to STANS as the public cannot provide informed consent with what has been provided.

The other similarly concerning point is the underlying principle on which the rule is based. The OCC is requesting to adjust the margin requirements on high volatility assets that it clears as a counterparty. A fundamental aspect of margin calls is the reduction of risk in an exposed asset when prices move away from the desired outcome. This rule is intended to reduce margin requirements in times of volatility in the assumption that prices will return over time. This may reduce risk in the short term by preventing immediate liquidation of leveraged/highly exposed parties however long term disincentivises the exposed/high risk parties from appropriately managing their own risk & remaining fully capitalised. If the price continues to move away rather than return this will lead to larger losses as obligations will increase exponentially and creates a sluggish response from the clearing firms/SROs. In the event prices in volatile stocks continue to climb, the most beneficial action would be to close positions early and act promptly. This rule does not reduce risks in the system if highly volatile assets remain highly volatile. This suggests volatility should be emphasized in margin calculations & an active deterrent to risk taking parties rather than metaphorically putting our heads in the sand and ignoring volatility.

I have not fully addressed other concerns in this comment such as the significant conflict of interest for OCC to reduce margin requirements in an attempt to prevent overleveraged firms from defaulting & taking onboard their obligations. Please refer to the numerous other disapproving public comments for these discussions.

In regards to SEC specific questions:

- As discussed above this rule creates a sluggish response to volatility and is in direct opposition to Section 17A(b)(3)(F) of the Exchange Act which requires "prompt and accurate clearance and settlement."
- Arguably not consistent with Rule 17Ad-22(e)(6) of the Exchange Act as it does not "consider & produces margin levels commensurate with, the RISKS and PARTICULAR ATTRIBUTES of each relevant product" or "calculates sufficient margin to cover its POTENTIAL FUTURE EXPOSURE" – as the rule proposal actively appears to minimise the risks of highly volatile assets and insufficiently calculate margin for potential future exposure if the price continues to move away from the expected range.
- In discussion of Rule 17Ad-22(e)(2) requiring clear and direct lines of responsibility – the current rule proposal is barely meeting this requirements with a very simple structure of governance of this rule despite it's significant & far reaching effects on the market. This aspect should be further expanded and optimally include multiple disinterested parties (i.e. direct Commission input) in deciding the margin calculations.

Thank you again for considering my comment and please continue to review all self-regulatory proposals in consideration of public interest.

Fjorde Plaires

Retail Investor

THIS IS WHERE THE  
GAMESTOPs

EVIDENCE TO THE PLAYERS



## TABLE OF CONTENTS

<b>MECHANISMS OF NEGATIVELY IMPACTING STOCK:</b> .....	<b>5</b>
<i>Naked Short Selling</i> .....	5
<i>Mismark short positions as long</i> .....	6
<i>Lack of taxable event until short position closed – provides excess funds upfront</i> .....	7
<i>Short positions not required to be reported / no formal disclosure requirements</i> .....	7
<i>Lack of reporting of offshore positions</i> .....	8
<i>Beneficial ownership / Street name / Custodian (allows legal title to DTC / Purchasing brokers rather than investor who supplied funds/order)</i> .....	9
<i>Failure to Deliver (FTD) / Failure to Receive</i> .....	11
<i>Obligation warehouse (Previously NSCC RECAPS)</i> .....	11
<i>Security lending / Using borrows as locates for short selling</i> .....	13
<i>Fully-Paid-For-Account at NSCC(DTCC Subsidiary) for locates</i> .....	15
<i>Lending customer’s cash account related positions (in addition to legal margin account positions)</i> .....	16
<i>Dark Pools / ATS / Wholesaler / Single Dealer Platform</i> .....	16
<i>Designated Market Maker Status</i> .....	21
<i>Bona Fide Market Maker / Bona Fide Market Maker Exemptions</i> .....	23
<i>High frequency trading (HFT) / AI controlled algorithms</i> .....	26
<i>Spoofing / Layering</i> .....	27
<i>Payment for Order Flow (PFOF)</i> .....	27
<i>Position close only (PCO) / Halting buying only</i> .....	28
<i>Self regulated agencies (SRO) – FINRA / DTCC (DTC/NSCC/OCC) / Exchanges (NASDAQ/NYSE) etc / Federal Reserve (Not government agencies – Private organisations)</i> .....	29
<i>FINRA arbitration for all broker contracts in case of customer dispute</i> .....	31
<i>Regulatory capture of regulatory agencies – CFTC / SEC / FED– often via offering lucrative jobs when they leave (i.e. Several ex-SEC commissioners hired by hedgefunds)</i> .....	32
<i>Regulatory Agencies legitimises criminal behaviour with delayed action &amp; when charged, settlement with no admission of guilt from involved parties, miniscule fines proportionate to the crime &amp; no significant punishment of behaviour (FINRA + SEC)</i> .....	33
<i>Buy Writes / Married Calls utilised as ‘Reset transactions’</i> .....	35
<i>Deep Out Of Money Puts (DOOMPS)</i> .....	37
<i>ETF share equivalence / Authorised participant</i> .....	39
<i>Single stock ETF</i> .....	42
<i>Swaps – Equity / Total return / Credit Default / Bullet / Variance</i> .....	43
<i>Swap Basket Stocks</i> .....	44

<i>'Zombie' Stocks – Bankrupt OTC stocks likely cellar-boxed</i> .....	47
<i>Tokenised securities i.e. crypto tokens as locates/collateral for short selling / margin</i> .....	47
<i>'Short Ladder Attacks'</i> .....	49
<i>Stop hunting (Triggering Stop-Loss)</i> .....	50
<i>Short sale restriction (SSR) / Alternative Uptick Rule</i> .....	52
<i>Forcing halts on Exchange i.e. NYSE via Limit Up Limit Down (LULD) Halt by rapidly increasing LULD Volatility for brief period of time</i> .....	52
<i>Halting sells during runs via technical difficulties preventing non-institutional investors accessing online accounts</i> .....	63
<i>Market close auction</i> .....	63
<i>Round lot</i> .....	63
<i>Forced maximum price for limit orders for retail investors i.e. Computershare price cap</i> .....	63
<i>Overvoting</i> .....	64
<i>Payment in lieu of dividend</i> .....	65
<i>Consulting firms – BCG / Corrupt board members</i> .....	66
<i>Death spiral via malicious loans / debt with predetermined value rather number of stock</i> .....	66
<i>Cellar-boxing</i> .....	67
<i>SPAC / IPO manipulation via being underwriter</i> .....	67
<b>EVIDENCE OF MISCONDUCT:</b> .....	<b>67</b>
<i>DTCC / Brokers misattribute incorrect split code on Stock split via Dividend for GME issued 22/7/22 – FC02 (Forward split) instead of FC06 (Stock split via dividend)</i> .....	67
<i>DTC theorised to utilise shares held with Computershare via Directstock for settlement</i> .....	72
<i>CFTC stop swap reporting ( 'temporary no action relief ' ) for 4 years under 'paperwork reduction ' act – suspiciously occurs in timeframe when redditors begin to investigate CFTC/Swaps</i> .....	73
<i>SEC FTD Data released publicly on a fortnightly basis despite receiving data daily, multiple accidental early releases by SEC or unnecessary further 2 week delay</i> .....	74
<i>SEC loses comments written by public only in timeframe where retail is involved (June 2021 – Oct 2022, majority Aug 2022)</i> .....	75
<i>Sunshine Act for Regulatory meetings (SEC / CFTC) averted by holding a majority of meetings as Closed door meetings using vague exceptions</i> .....	75
<i>SEC avoiding FOIA requests by delaying responses, seeking exception (claiming ongoing investigation) and if still required provides very limited half-responses</i> .....	77
<i>SEC implements 'Expert Markets' for OTC Stocks/Penny stocks excluding all but institutional investors/accredited investor (not retail) from transacting shares – Notably occurred in same timeframe of redditors discovering Cellar-boxing</i> .....	81
<i>Banking Reserve requirements reduced to 0% for COVID &amp; continued indefinitely</i> .....	82

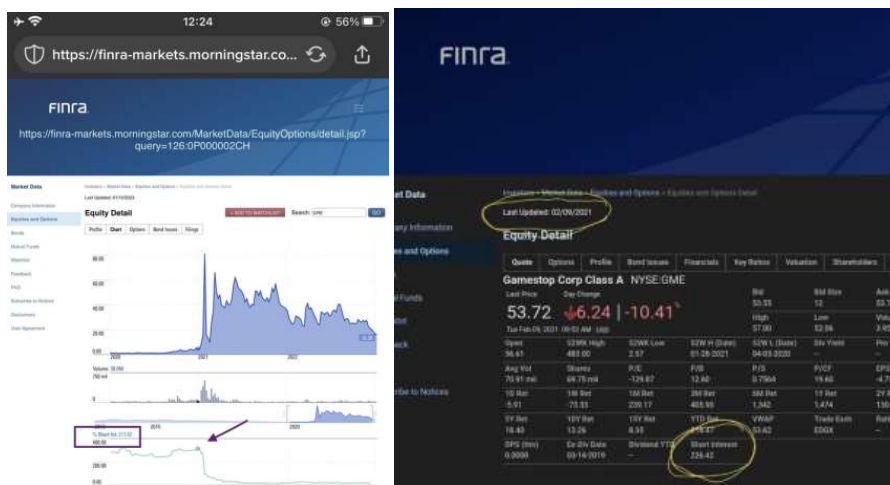
<i>Federal Reserve Presidents sells all personal shares at peak citing 'ethic concerns' immediately before significant price decline in stock market .....</i>	82
<i>Short interest exceeded 100% during Jan-Feb 2021 (Up to 313%).....</i>	83
<i>Short Interest calculation changed by S3 Partners &amp; FINRA after GME Jan 2021 Event.....</i>	86
<i>Daily Share volume reached nearly a billion shares traded per day (Total issued shares only 65million) in Jan 2021, Citadel claims to have cleared 7.4 billion orders on 27/1/21 alone .....</i>	87
<i>Robinhood order filled at prices exceeding displayed share price on NMS Exchanges - \$2605.05 for GME on 27/1/21 .....</i>	91
<i>Significant 'erroneous' Market data suggestive of significant GME positions – Brazil puts / Ortex Short Interest &amp; Borrowed shares spike / Fidelity 13.7million Shares available for shorting .....</i>	91
<i>Requests for Direct Registration at Broker are delayed or not available or charged exorbitant fees to discourage. To initiate transfer broker provides misleading mandatory advice. Received shares in DRS often don't include cost basis information. ....</i>	106
<i>Market participants utilise amendments or seek exceptions for reporting on SEC 13F Filings to avoid publicly listing short positions (including options) – Melvin Capital.....</i>	111
<i>Glacier Capital Fiasco .....</i>	112
<i>Data storage facility / Warehouse for TD Ameritrade/Other brokers burns down (3/2/22) day before DOJ announcement of investigation into short selling/hedgefunds (4/2/22) .....</i>	113
<i>Likely perjury during House hearings on GameStop – Claiming no communication between Robinhood / Citadel / Ken Griffin – Contradicted in House Rep report &amp; leaked phone conversations.....</i>	113
<i>CNBC actively censors live GME Congressional hearing with their own live broadcast – achieved by running a delayed feed and insidiously skipping certain conversations – in particular edited out Dennis Kelleher stating Citadel is not integral to current system .....</i>	115
<i>Suspected involvement of Archegos Capital Management with GME Swap exposure -&gt; Archegos collapse -&gt; Absorbed by Credit Suisse -&gt; Credit Suisse collapse -&gt; Absorbed by UBS (Note Archegos' remaining open positions not publicly named despite swaps in valuations mimicking GME price in early 2021, similarly no public disclosure with Credit Suisse collapse, official inquiry documents sealed for 50years by Swedish Parliament).....</i>	115
<i>Constant negative sentiment articles over 4year period with very minimal positive news articles (if positive scattered with negative sentiment or downplay of positivity)(often regarding missed earnings expectations from in-house analysts).....</i>	117
<i>Multiple disingenuous articles written providing exaggerated/coloured views &amp; changing sentiment (i.e. Silver / hate speech) .....</i>	117
<i>Authors of Financial Media Articles – frequently have no financial expertise, only English/writing degrees, some are even paid overseas advertising companies or completely AI generated .....</i>	118
<i>Market Participants own controlling interest or heavily sponsor Financial media outlets (such as CNBC / NBC / Motley Fool / Yahoo Finance) .....</i>	126
<i>Using Financial media to reframe negative news for large market participants – 'give money back' rather than investors withdraw fund .....</i>	128

<i>Disingenuous price assessments by in-house analysts to push sentiment .....</i>	<i>129</i>
<i>Multiple articles used to imply correlation to price action despite occurring prior i.e. RC BABA purchase....</i>	<i>133</i>
<i>Financial media utilised to smear relevant parties to GME movement - Ryan Cohen (Largest GME shareholder &amp; later Chairman/CEO), Wes Christian called looney by Forbes for investigating naked shorting, Carl Icahn 70% share drop after Hindenburg Short report .....</i>	<i>133</i>
<i>MSM at time of squeeze suggesting redditors moved to other stocks .....</i>	<i>135</i>
<i>Multiple articles stating drop / rise in price minutes prior to price action takes place i.e. Mar 10 CNBC/MarketWatch predicts 40% price drop prior to occurring .....</i>	<i>136</i>
<i>Bot activity on social media suggesting alternative tickers – Note redditors began to notice unusual activity when bots started to hype ticker \$SSR after frequent posts about Short Sale Restriction (abbreviated as SSR on reddit) – as a result redditor began creating posts with keywords written in capitals TARD / ASS / CUM leading to active bot activity suggesting tickers \$TARD / \$ASS / \$CUM to clearly identify bots .....</i>	<i>138</i>
<i>Infiltrated social media &amp; attempted coup of moderators to limit engagement &amp; control narrative via censoring &amp; misinformation, aggressive dismissal of information, emotional manipulation - hype cycles / implication / peer consensus flooding / disrupt &amp; segregate conversation / false flags / forum slide / inconsistent rules applied by mods/reddit admins.....</i>	<i>139</i>
<i>MMTLP – prematurely forced closed trading 2 days early by FINRA, despite statement by FINRA in 12hours prior stating trading will cease on the correct scheduled days. Early force close prevented short closing. New converted share have been delayed &gt;2years &amp; delisted. Wes Christian obtained emails with correspondence between FINRA &amp; SEC regarding MMTLP. MMTLP originally not tradeable, started trading by entities not involved with MMTLP as per CEO.....</i>	<i>146</i>

## MECHANISMS OF NEGATIVELY IMPACTING STOCK:

## NAKED SHORT SELLING

- Short selling – A position that profits on decline of share price and loses value on increased share price. Opposite of a long position (buying a share). Opened by borrowing someone else's stock (or locating someone willing to lend out) and selling that share on the market. The position is closed when the short seller repurchases the sold share and returns it to the lending 'investor'. Unlike a long position that has a maximum limit of losses (can only lose the initial money paid for stock), short sales have a risk of infinite losses as there is no limit to share price at which stock is repurchased. <https://www.investopedia.com/terms/s/shortselling.asp>
- Naked Short selling - Short selling without a locate / borrow (i.e. without a share, thus necessitating a FTD/FTR)
- SEC FAQ RegSHO/Naked Shorts - <https://www.sec.gov/investor/pubs/regsho.htm>
- Investopedia FAQ - <https://www.investopedia.com/terms/n/nakedshorting.asp>
- Market Makers/BonaFide MM have exemptions in RegSHO to legally naked short sell (in certain conditions) and extended periods to close resultant FTDs <https://www.sec.gov/investor/pubs/regsho.htm>
- GameStop in Jan 2021 had Short Interest (Percentage of shorts to total shares outstanding) exceeding 226% (i.e. More shorts existed than the entire number of shares of the stock, by more than a factor of 2! As a share must be borrowed/located for regular short selling & shorts exceeded all shares, highly suggestive of Naked Short selling) [https://www.reddit.com/r/Superstonk/comments/108e717/finras\\_website\\_still\\_shows\\_that\\_gm\\_e\\_short/](https://www.reddit.com/r/Superstonk/comments/108e717/finras_website_still_shows_that_gm_e_short/) (Reddit screenshot of FINRA 313% SI) [https://www.reddit.com/r/GME/comments/lg5o47/226\\_short\\_interest\\_in\\_gme/?rdt=36050](https://www.reddit.com/r/GME/comments/lg5o47/226_short_interest_in_gme/?rdt=36050) (Reddit screenshot of FINRA 226% SI) + another of FINRA (226%) [https://www.reddit.com/r/GME/comments/lgjztf/wtf\\_is\\_going\\_on\\_with\\_finra\\_is\\_it\\_7846\\_or\\_22642/](https://www.reddit.com/r/GME/comments/lgjztf/wtf_is_going_on_with_finra_is_it_7846_or_22642/) + SEC Report GME (109% SI) <https://www.sec.gov/files/staff-report-equity-options-market-struction-conditions-early-2021.pdf> + Class Action Lawsuit against Robinhood (shows 226% SI) <https://www.classaction.org/media/in-re-short-squeeze-trading-antitrust-mdl.pdf> + [https://www.reddit.com/r/Superstonk/comments/o6mp0c/from\\_class\\_action\\_against\\_rh\\_look\\_at\\_that\\_juicy/?utm\\_source=share&utm\\_medium=web2x&context=3](https://www.reddit.com/r/Superstonk/comments/o6mp0c/from_class_action_against_rh_look_at_that_juicy/?utm_source=share&utm_medium=web2x&context=3)



Item	2020 Actual	2020 Prior	2019 Actual	2019 Prior	2018 Actual	2018 Prior	2017 Actual	2017 Prior	2016 Actual	2016 Prior
Short Interest	122.97%	77.3%	66.02%	62.41%	9%	33.12%	33.12%	33.12%	33.12%	33.12%

Some institutional accounts had significant short interest in GME prior to January 2021.<sup>61</sup> GME short interest (as a percent of float) in January 2021 reached 122.97%, far exceeding other meme stocks like Dillard's, Inc. (symbol: DDS) (77.3%), Bed Bath & Beyond, Inc. (symbol: BBBY) (66.02%), National Beverage Corp. (symbol: FIZZ) (62.59%), Koss Corp. (symbol: KOSS) (9.92%), Naked Brand Group, Ltd. (symbol: NAKD) (7.3%), and AMC Entertainment Holdings Inc. (symbol: AMC) (11.4%).

Figure 5



4:07  
rosenlegal.com

18. This was GME's stock price recovery. Retail investors began to take notice of the strategy, and began searching for other, similar opportunities, and the other Affiliated Securities, many with a high short percentage, began to experience heavy volume as retail investor interest increased.

19. Indeed, of the Affiliated Securities had an unusually high short interest, or number of shares that had been sold short but not yet covered or closed out. These securities were primarily shorted by institutional investors. The following chart describes the shorted percentage of float<sup>78</sup> as of January 15, 2021, for each of the Affiliated Securities:

Security	Shorted Float Percentage
AAL	33.12%
AMC	38.12%
BBB	9%
BBBY	62.41%
GME	126.42%

20. That, on January 28, 2021, Robinhood, and other brokers, restricted trading on the Affiliated Securities to closing transactions only. As a result of this

Source: Value Line

- Evid from former Morgan Stanley Employee, admitting to naked short frequently (OG source Gaming Wallstreet Documentary HBO)<https://www.youtube.com/watch?v=i-tKiiHWGkE>
- Evid Naked Short selling still occurs – SEC Charges June 2023 <https://www.sec.gov/news/press-release/2023-107>
- UBS Securities in 2022 Charged by FINRA with abusively utilising open fails/FTD to naked short (>70,000 short sells) over 9 YEARS (2009-2018) – Allowed to consent without admission of guilt, Fined \$2.5million, received 'censure' & requires to write guidelines within 90days - [https://www.finra.org/sites/default/files/fda\\_documents/2016050211701%20UBS%20Securities%20LLC%20CRD%207654%20AWC%20Final%20geeg%20%282022-1667434816509%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2016050211701%20UBS%20Securities%20LLC%20CRD%207654%20AWC%20Final%20geeg%20%282022-1667434816509%29.pdf)
- Citigroup in 2020 Charged by FINRA with naked short selling (>38,000 Short sells) – no admission of guilt, fined \$225,000 & required to write guideline in 30days [https://www.finra.org/sites/default/files/fda\\_documents/2015045325201%20Citigroup%20Global%20Markets%20Inc.%20CRD%207059%20%20AWC%20va%20%282020-1581639568074%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2015045325201%20Citigroup%20Global%20Markets%20Inc.%20CRD%207059%20%20AWC%20va%20%282020-1581639568074%29.pdf)
- IKBR 2019 Charged with Naked short selling – No admission of guilt, \$5.5mil fine, a 'censure' & guidelines [https://www.finra.org/sites/default/files/fda\\_documents/2014043143401%20Interactive%20Brokers%20LLC%20BD%2036418%20AWC%20im%20%282019-1563436162277%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2014043143401%20Interactive%20Brokers%20LLC%20BD%2036418%20AWC%20im%20%282019-1563436162277%29.pdf)

### MISMARK SHORT POSITIONS AS LONG

- To avoid short reporting, short positions are mismarked as long positions. These positions are not included in short interest.
- Numerous FINRA disciplinary actions regarding mismarking position with very significant quantities of 'mismarked' shorts
- Goldman Sachs 2023 FINRA – 60million short sales mismarked as long (over 14billion shares) from 2015-2018 – no admission of guilt, \$3million fine & censure [https://www.finra.org/sites/default/files/fda\\_documents/2018059146501%20Goldman%20Sachs%20%26%20Co.%20LLC%20CRD%20361%20AWC%20lp%20%282023-1683246001785%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2018059146501%20Goldman%20Sachs%20%26%20Co.%20LLC%20CRD%20361%20AWC%20lp%20%282023-1683246001785%29.pdf)



**OVERVIEW**

From October 2015 to April 2018, Goldman mismarked as "long" approximately 60 million short sale orders totaling more than 14 billion shares. Nearly eight million of those orders, totaling more than a billion shares, were executed. Due to the inaccurate "long" mark, 12,335 of the executed orders were executed at or below the national best bid while a short sale circuit breaker was in effect. These mismarked orders also caused the firm to submit inaccurate trade reports to FINRA and maintain inaccurate books and records. As a result, Goldman violated Rules 200(g) of Regulation SHO, Section 17(a) of the Securities Exchange Act of 1934 and Exchange Act Rule 17a-3, and FINRA Rules 4511, 6182, 6624, and 2010.

<sup>1</sup> For more information about the firm, including prior regulatory events, visit BrokerCheck® at [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

- Goldman Sachs 2023 FINRA – 97million transactions not accurately provided via blue sheets – no admission of guilt, \$6million fine & 90days to implement guidelines  
[https://www.finra.org/sites/default/files/fda\\_documents/2019061945001%20Goldman%20Sachs%20%26%20Co.%20LLC.%20CRD%20361%20AWC%20lp%20%282023-1698020407374%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2019061945001%20Goldman%20Sachs%20%26%20Co.%20LLC.%20CRD%20361%20AWC%20lp%20%282023-1698020407374%29.pdf)
- Wolverine Execution Services 2021 FINRA – between 2016-2019 mismarked >18,000 shorts as long positions & >550,000 shorts did not have compliance with locate requirement – no admission of guilt, \$170,000 fine and ‘censure’  
[https://www.finra.org/sites/default/files/fda\\_documents/2018057166105%20Wolverine%20Execution%20Services%2C%20LLC%20CRD%20120719%20AWC%20va%20%282021-1624494009724%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2018057166105%20Wolverine%20Execution%20Services%2C%20LLC%20CRD%20120719%20AWC%20va%20%282021-1624494009724%29.pdf)
- Merrill Lynch Pierce FINRA 2020 – 2012-2017 did not notify of >11,000 Short sales - no admission of guilt, \$150,000 fine & ‘censure’  
[https://www.finra.org/sites/default/files/fda\\_documents/2015045603201%20Merrill%20Lynch%2C%20Pierce%2C%20Fenner%20%26%20Smith%20Inc.%20CRD%207691%20AWC%20sl%20%282020-1598141969567%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2015045603201%20Merrill%20Lynch%2C%20Pierce%2C%20Fenner%20%26%20Smith%20Inc.%20CRD%207691%20AWC%20sl%20%282020-1598141969567%29.pdf)

### LACK OF TAXABLE EVENT UNTIL SHORT POSITION CLOSED – PROVIDES EXCESS FUNDS UPFRONT

- IRS Document “Section 1.1233-1(a)(1) provides, “For income tax purposes, a short sale is not deemed to be consummated until delivery of property to close the short sale.” Pursuant to ' 1.1233-1(a)(4), if the short sale is made through a broker and the broker borrows property to make a delivery, the short sale is not deemed to be consummated until the obligation of the seller created by the short sale is finally discharged by delivery of property to the broker to replace the property borrowed by the broker.” - <https://www.irs.gov/pub/irs-drop/rr-04-15.pdf>
- <https://www.law.cornell.edu/cfr/text/26/1.1233-1>



### SHORT POSITIONS NOT REQUIRED TO BE REPORTED / NO FORMAL DISCLOSURE REQUIREMENTS

- Interview with Gary Gensler SEC Commissioner directly admitting no publicly available short data, minimal regulatory oversight of short selling activity (2 private feeds)  
[https://www.youtube.com/watch?v=\\_7aTD9Ybv2E](https://www.youtube.com/watch?v=_7aTD9Ybv2E)

- Evidence of need for reform – SEC rule proposal in 2023 to add public disclosure, finalised 2024 - <https://www.sec.gov/rules/2022/02/notice-text-proposed-amendments-national-market-system-plan-governing-consolidated#34-98738> + <https://www.sec.gov/news/press-release/2023-221>
- Short selling data is SELF reported by market participants & short interest is only required to be reported twice a month. Overseas short positions are not required to be reported. FTR (Fail-to-Receive) does not need to be reported in short interest. <https://www.finra.org/filing-reporting/regulatory-filing-systems/short-interest/faq> + <https://www.finra.org/filing-reporting/regulatory-filing-systems/short-interest>
  - Short Interest = Ratio of share short to total shares outstanding

## LACK OF REPORTING OF OFFSHORE POSITIONS

- FINRA FAQ clearly stating offshore positions are not required to be reported - <https://www.finra.org/filing-reporting/regulatory-filing-systems/short-interest/faq>



- May be utilising 'Enhanced lending' or 'Short arranging products' - Allowing customers to borrow shares from firm's domestic or foreign affiliate to close out short positions <https://www.finra.org/rules-guidance/notices/21-19> + [https://www.reddit.com/r/GME/comments/or91vf/what we do in the shadows part 1/](https://www.reddit.com/r/GME/comments/or91vf/what_we_do_in_the_shadows_part_1/)  
**Synthetic Short Positions:** In addition, FINRA is considering requiring firms to reflect synthetic short positions in short interest reports. For example, enhanced short interest reporting could include synthetic short positions achieved through the sale of a call option and purchase of a put option (where the options have the same strike price and expiration month) or through other strategies. FINRA believes this information would assist FINRA in understanding the scope of market participants' short sale activity, specifically regarding the use of less-traditional means of establishing short interest.  
**Loan Obligations Resulting From Arranged Financing:** FINRA understands that members may offer arranged financing programs (sometimes called "enhanced lending" or "short arranging products") through which a customer can borrow shares from the firm's domestic or foreign affiliate and use those shares to close out a short position in the customer's account. FINRA is considering requiring members to report as short interest outstanding stock borrows by customers in their arranged financing programs to better reflect actual short sentiment in the stock.
  - FINRA charges JPM 2020 – Allowed Brazilian affiliates to trade as JPM US, avoiding the need for FINRA approval – allowed to not admit guilt, \$20,000 fine & 'censure' [https://www.finra.org/sites/default/files/fda\\_documents/2017053128501%20Morgan%20Stanley%20%26%20Co.%20LLC%20CRD%20208209%20AWC%20sl%20%282020-1584749965608%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2017053128501%20Morgan%20Stanley%20%26%20Co.%20LLC%20CRD%20208209%20AWC%20sl%20%282020-1584749965608%29.pdf)
- Extensive SEC Comment on Enhanced lending to offshore short positions & FTD + <https://www.sec.gov/comments/s7-11-15/s71115-19.pdf> (pg76 onwards)

The clearing firm's United Kingdom books are commonly used as a foreign jurisdictional location to re-hypothecate assets. This was discussed in a publication by Practical Law on Davis Polk & Wardwell's website.<sup>81</sup>

"In the US, the extent to which a prime broker can rehypothecate a client's assets is limited by the Securities Exchange Act of 1934, as amended (Securities Exchange Act). Prime brokers can rehypothecate assets to the value of 140% of a client's liability to a prime broker. Further, prime brokers cannot use those assets to raise more money than

<sup>81</sup> Copyright © 2010 Practical Law Publishing Limited and Practical Law Company, Inc. All Rights Reserved. Use of PLC websites and services is subject to the Terms of Use (<http://us.practicallaw.com/2-383-6690>) and Privacy Policy (<http://us.practicallaw.com/8-383-6692>). For further information visit [practicallaw.com](http://practicallaw.com) or call (646) 562-3400. *The Traditional Prime Brokerage Model* [http://www.davispolk.com/files/Publication/030265d8-47c5-4de9-8a35-656619e6c4aa/Presentation/PublicationAttachment/64908894-1466-4470-866f-0a4a93f322b7/gordan\\_rcolby\\_practicallaw\\_article\\_apr10.pdf](http://www.davispolk.com/files/Publication/030265d8-47c5-4de9-8a35-656619e6c4aa/Presentation/PublicationAttachment/64908894-1466-4470-866f-0a4a93f322b7/gordan_rcolby_practicallaw_article_apr10.pdf)

they lend to their customers. This is different from the UK where there are no statutory limits on the value of assets that the prime broker can rehypothecate or how much money it can raise from using those assets. Because rehypothecation is so profitable for prime brokers, some prime brokerage agreements allow for a US client's assets to be transferred to the prime broker's UK subsidiary to circumvent these US rehypothecation limits. "Under the typical prime brokerage agreement the prime broker can use all of the client's assets, even if the value of these is far in excess of the actual obligations owed by the client," says Leonard Ng.<sup>82</sup> Under UK law, when the prime broker exercises its right to rehypothecate an asset, the title to that asset transfers to the prime broker. For these reasons, prime brokerage agreements are often structured to permit client-asset transfer to the prime brokerage's UK affiliate."

- MMTLP CEO John Brda discussing alleged misconduct by FINRA including not disclosing short reports do not include offshore positions <https://www.youtube.com/watch?v=befDS9mA3lg>
- Law Professor Michael Greenberger Paper on loophole with offshore entities & swaps [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3228783](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3228783)
- Redditor analysis of offshoring risk via swaps [https://www.reddit.com/r/Superstonk/comments/pc0zhv/swapping\\_regulations\\_for\\_offshore\\_risk\\_the\\_full/](https://www.reddit.com/r/Superstonk/comments/pc0zhv/swapping_regulations_for_offshore_risk_the_full/)

#### BENEFICIAL OWNERSHIP / STREET NAME / CUSTODIAN (ALLOWS LEGAL TITLE TO DTC / PURCHASING BROKERS RATHER THAN INVESTOR WHO SUPPLIED FUNDS/ORDER)

- SEC Overview 2023 - <https://www.sec.gov/about/reports-publications/investor-publications/holding-your-securities-get-the-facts> (the following is derived from this official summary)
- In US Shares can be held in predominantly 3 forms:
  - Beneficial Ownership / Street Name – Stock held at DTC under an intermediary's name (Broker-Dealer) who provides stock 'entitlement' to investor ('Beneficiary')
    - 99% of US Shares are held at DTC by CEDE&Co (DTC's Nominee)
      - DTC (Depository Trust Company) is the main central securities depository in US
    - Beneficial ownership relies on the broker-dealer maintaining records that the purchasing investor is the 'real' or 'beneficial' holder
    - The stock is under legal title of CEDE&Co on the issuer's ledger (issuer=Company issuing stock)
    - On DTC's(CEDE&Co) ledger, the stock is held in the broker-dealer's or nominee of broker dealer/clearing agency's account/name
    - The Broker-Dealer maintains records that identifies the 'stock entitlement' to the purchasing investor/'beneficial' owner

- Direct Registered – Stock held at Transfer agent (Issuer’s shareholder ledger manager) directly under investors’ name (electronically held) & listed directly on Issuer’s ledger
  - The Stock is under direct legal title of the purchasing Investor
- Stock Certificate – Stock held in paper certificate form in investors’ name & listed on Issuer’s ledger
  - The Stock is under direct legal title of the purchasing Investor
- Tennessee Texas House Hearing April 2024 w expert explanation of lack of protection for security entitlements & legal structure – House hearing accomplishes amendment to laws so that beneficial owners in TN maintain legal title in the event of failure/insolvency of Clearing Firms (i.e. DTC) (priority of creditors) [https://www.youtube.com/watch?v=ldNdW3\\_00gl](https://www.youtube.com/watch?v=ldNdW3_00gl)
- SEC Speech by Director of Market Regulation – 2007 – Directly acknowledges ‘Beneficial’ owners only receive ‘Securities entitlement’ from broker-dealer, not ownership of the stock ordered & funded by the investor. There is an issue of overvoting due to ‘securities entitlements’ exceeding the ‘fungible bulk’ (i.e. issued stock). The SEC (in 2007) believes informing the Investor via Customer agreements is sufficient for providing ‘Stock entitlements’ rather than underlying stock/asset <https://www.sec.gov/news/speech/2007/spch101607ers.htm>

Consequently, there are no specific shares directly owned by either the broker participants of DTC or the underlying beneficial owner. As a result, a beneficial owner’s ownership cannot be tracked to specific shares but rather its ownership interest is represented as a securities entitlement at his or her broker-dealer. Each of those beneficial owners don’t own the actual shares credited to their account but rather they own a bundle of rights defined by federal and state law and by contract with their broker. Consequently, a beneficial owner may not have the “right” to vote the securities credited to his or her account. It depends on what the beneficial owner’s contract says. That’s news to a lot of people.
- Association of Global Custodians public comment on SEC Rule proposal 2002 – confirms as per Section 8-503 Securities entitlement does not confer specific property rights to the securities entitlement holder <https://www.sec.gov/rules/proposed/s72201/goelzer2.htm>

has evolved in the U.S. securities markets; the entitlement holder concept was not designed to make a securities intermediary the owner of financial assets held by it in custody.<sup>2</sup> Rather, a “securities entitlement” is a package of rights that an accountholder has against its securities intermediary with respect to the positions carried in a securities account. When the accountholder (i.e., the beneficial owner) sells a financial asset held in a securities account, the entitlement is extinguished, and the purchaser acquires a new securities entitlement against its securities intermediary.

Section 8-503 does recognize that entitlement holders cannot realistically have a specific property interest in a particular financial asset when the intermediary holds an asset on behalf of more than one entitlement holder. Section 8-503(b) states that the entitlement holder’s interest is “a pro-rata property interest in all interests in that financial asset held by the securities intermediary.”<sup>3</sup> However, Section 8-503 and comment 1 thereto expressly state the
- Section 8-503 regarding holder of financial assets via intermediary – Asset held for beneficiary is not intermediaries property except as provided in Section 8-511 – where it is not the beneficiaries property (lower priority) in the event the clearing corporation (DTCC etc) does not have sufficient assets to satisfy both its obligations to the beneficiary and it’s creditors or when a creditor has a security interest in the asset (higher priority than beneficiary) <https://www.law.cornell.edu/ucc/8/8-503> + <https://www.law.cornell.edu/ucc/8/8-511#8-511>

## HOLDER IN FINANCIAL ASSET HELD BY SECURITIES INTERMEDIARY.

(a) To the extent necessary for a securities intermediary to satisfy all security entitlements with respect to a particular financial asset, all interests in that financial asset held by the securities intermediary are held by the securities intermediary for the entitlement holders, are not property of the securities intermediary, and are not subject to claims of creditors of the securities intermediary, except as otherwise provided in Section 8-511.

(b) An entitlement holder’s property interest with respect to a particular financial asset under subsection (a) is a pro rata property interest in all interests in that financial asset held by the securities intermediary, without regard to the time the entitlement holder acquired the security entitlement or the time the securities intermediary acquired the interest in that financial asset.

## § 8-511. PRIORITY AMONG SECURITY INTERESTS AND ENTITLEMENT HOLDERS.

(a) Except as otherwise provided in subsections (b) and (c), if a securities intermediary does not have sufficient interests in a particular financial asset to satisfy both its obligations to entitlement holders who have security entitlements to that financial asset and its obligation to a creditor of the securities intermediary who has a security interest in that financial asset, the claims of entitlement holders, other than the creditor, have priority over the claim of the creditor.

(b) A claim of a creditor of a securities intermediary who has a security interest in a financial asset held by a securities intermediary has priority over claims of the securities intermediary's entitlement holders who have security entitlements with respect to that financial asset if the creditor has control over the financial asset.

(c) If a clearing corporation does not have sufficient financial assets to satisfy both its obligations to entitlement holders who have security entitlements with respect to a financial asset and its obligation to a creditor of the clearing corporation who has a security interest in that financial asset, the claim of the creditor has priority over the claims of entitlement holders.

### FAILURE TO DELIVER (FTD) / FAILURE TO RECEIVE (FTR)

- Failure of delivering or receiving stock
  - Note – despite failure to deliver or receive, the stock transaction is still completed and money is exchanged even if stock is not. This event dilutes the issued stock float as a ‘phantom share’ is created. FTD/FTR of transaction is not communicated to the purchasing retail investor. FTDs are obligated to be fulfilled in T+2 / T+3 or T+35 (if exempted) dependent on the circumstances. This process may be delayed by ‘fulfilling’ an FTD by further borrowing a stock. This stock may have been borrowed & short sold prior. <https://www.sec.gov/news/speech/2007/spch101607ers.htm>
- SEC FAQ RegSHO/Naked Shorts & FTD - <https://www.sec.gov/investor/pubs/regsho.htm>
- Investopedia FAQ - <https://www.investopedia.com/terms/f/failuretodeliiver.asp>
- SEC FTD Data - <https://www.sec.gov/data/foiadocsfailsdatahtm>
- Threshold List (if significant FTDs in target security - >10,000Shares or >0.5% total shares outstanding for 5 consecutive days on registered clearing firm - becomes listed on Threshold list, as per RegSHO Rule 204 if exceed >13days on Threshold list then failing participant must immediately purchase failed positions)
- Refer to Book “Naked, Short And Greedy: Wall Street’s Failure to Deliver” by Dr. Susanne Trim bath (Ex-DTCC Employee) for extensive FTD history & case examples occurring in US Markets <https://www.nyse.com/regulation/threshold-securities>
- Dr Trim bath interview - [https://www.youtube.com/watch?app=desktop&v=4TdfXGFj\\_zs](https://www.youtube.com/watch?app=desktop&v=4TdfXGFj_zs)
- Another Dr Trim bath Interview - <https://www.youtube.com/watch?v=ITeiFwJlGGI>
- Redditor summary on methods of ‘counterfeiting’ shares [https://www.reddit.com/r/GME/comments/mk7ie1/exposing\\_wall\\_street\\_the\\_holy\\_trinity\\_of/?rdt=39134](https://www.reddit.com/r/GME/comments/mk7ie1/exposing_wall_street_the_holy_trinity_of/?rdt=39134)
- UBS Securities in 2022 Charged by FINRA with abusively utilising open fails/FTD to naked short (>70,000 short sells) over 9 YEARS (2009-2018) – Allowed to consent without admission of guilt, Fined \$2.5million, received ‘censure’ & requires to write guidelines within 90days - [https://www.finra.org/sites/default/files/fda\\_documents/2016050211701%20UBS%20Securities%20LLC%20CRD%207654%20AWC%20Final%20geg%20%282022-1667434816509%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2016050211701%20UBS%20Securities%20LLC%20CRD%207654%20AWC%20Final%20geg%20%282022-1667434816509%29.pdf)
- Wedbush Securities Charged by FINRA 2022 for abusing FTD over 4 years – no admission of guilt, \$900,000 fine, censure & a written guideline within 90days (Note was previously charged for similar abuse just 5 years earlier) [https://www.finra.org/sites/default/files/fda\\_documents/2019061872201%20Wedbush%20Securities%2C%20Inc.%20CRD%20877%20AWC%20lp%20%282022-1666916413754%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2019061872201%20Wedbush%20Securities%2C%20Inc.%20CRD%20877%20AWC%20lp%20%282022-1666916413754%29.pdf)

### OBLIGATION WAREHOUSE (PREVIOUSLY NSCC RECAPS)

- “Central depository of open (i.e. failed or unsettled) broker-to-broker obligations” <https://www.federalregister.gov/documents/2010/12/29/2010-32730/self-regulatory->

[organizations-national-securities-clearing-corporation-order-granting-approval-of-a](https://www.govinfo.gov/content/pkg/FR-2010-12-29/pdf/2010-32730.pdf) OR <https://www.govinfo.gov/content/pkg/FR-2010-12-29/pdf/2010-32730.pdf>

- DTCC Site Explanation – “OW stores eligible unsettled obligations (including securities exited from NSCC’s Continuous Net Settlement (CNS) system, Non-CNS Automated Customer Account Transfer Service (ACATS) items, NSCC Balance Order transactions, and Special Trades) in a central location and provides on-going maintenance and servicing of such obligations, including daily checks for CNS-eligibility and periodic updates for certain mandatory corporate actions, until such obligations are settled, cancelled, or otherwise closed in the system. OW will also provide enhanced and more frequent RECAPS processing on a pre-announced schedule.” <https://www.dtcc.com/clearing-services/equities-clearing-services/ow>
- “RECAPS allows members <sup>[6]</sup> to periodically reconfirm open, aged fails (I.E., fails that are five or more days old), reprice such fails to the current market value, and when possible, net the reconfirmed and repriced fails. As part of the RECAPS process, those CNS-eligible recompared fails are forwarded to CNS for processing and settlement. Transactions in non-CNS eligible issues are repriced, netted, and allotted, when applicable, and Balance Orders generated for them or they are designated to settle trade-for-trade.” <https://www.federalregister.gov/documents/2010/12/29/2010-32730/self-regulatory-organizations-national-securities-clearing-corporation-order-granting-approval-of-a> OR <https://www.govinfo.gov/content/pkg/FR-2010-12-29/pdf/2010-32730.pdf>
- Grandfathering of Fails to Deliver prior to 2008 in NSCC RECAPS Service (Reconfirmation and Pricing Service) via RegSHO loophole (FTD Data comprises of only Fails in Continuous net settlement (CNS) system, does not include ex-clearing fails) -> in 2010 RECAPS updated to become Obligation Warehouse -> 2013 OW updated to include provision that either receiver or deliverer of obligation can mark obligation for exemption from CNS processing (if either party marks for exemption then it is exempted & cannot be overridden by other party)

The screenshot shows a webpage titled "Fails-to-Deliver Data" for the period "February 2004 - September 2021". It includes a "Fails Data Availability" section with two bullet points: "The first half of a given month is available at the end of the month." and "The second half of a given month is available at about the 15th of the next month." Below this is a "What You Should Know About the Data" section. The text explains that the data covers the time period from February 2004 to September 2021, with data for the first half of a month available at the end of the month and the second half available around the 15th of the next month. It also mentions that the data is aggregated over all NSCC members and includes only securities with a balance of total fails-to-deliver of at least 10,000 shares as of a particular settlement date. The data is split into two periods: February 2004 to September 2007, and October 2007 to September 2021. The first period includes all securities with a balance of total fails-to-deliver of at least 10,000 shares as of a particular settlement date. The second period includes all securities with a balance of total fails-to-deliver of at least 10,000 shares as of a particular settlement date. The data is split into two periods: February 2004 to September 2007, and October 2007 to September 2021. The first period includes all securities with a balance of total fails-to-deliver of at least 10,000 shares as of a particular settlement date. The second period includes all securities with a balance of total fails-to-deliver of at least 10,000 shares as of a particular settlement date.

- FTD Data show evid of CNS only (April 2024) <https://www.sec.gov/data/foiadocsfailsdatahtm>
- 2010 RECAPS-> Obligation Warehouse <https://www.federalregister.gov/documents/2010/12/29/2010-32730/self-regulatory->

[organizations-national-securities-clearing-corporation-order-granting-approval-of-a](https://www.govinfo.gov/content/pkg/FR-2010-12-29/pdf/2010-32730.pdf) OR  
<https://www.govinfo.gov/content/pkg/FR-2010-12-29/pdf/2010-32730.pdf>

- 2012 Obligation Warehouse 'Enhancement' to opt out of sending obligation to CNS  
<https://www.dtcc.com/-/media/Files/pdf/2012/5/21/a7428.pdf>
- Reddit Summary of Obligation Warehouse  
[https://www.reddit.com/r/Superstonk/comments/r86vkb/how\\_to\\_rig\\_a\\_settlement\\_system\\_starring/](https://www.reddit.com/r/Superstonk/comments/r86vkb/how_to_rig_a_settlement_system_starring/)
- Another Reddit summary of Obligation Warehouse  
[https://www.reddit.com/r/Superstonk/comments/wg05qp/naked\\_shorting\\_the\\_dtcc\\_obligation\\_warehouse\\_and/](https://www.reddit.com/r/Superstonk/comments/wg05qp/naked_shorting_the_dtcc_obligation_warehouse_and/)
- Overview of DTCC & pipeline of Obligation Warehouse & Fully Paid Lending service  
[https://www.reddit.com/r/Superstonk/comments/rb42h6/the\\_dtcc\\_has\\_a\\_program\\_that\\_allows\\_any\\_broker/](https://www.reddit.com/r/Superstonk/comments/rb42h6/the_dtcc_has_a_program_that_allows_any_broker/)

## SECURITY LENDING / USING BORROWS AS LOCATES FOR SHORT SELLING

- Lending an owned share/asset. The borrower is usually a short seller. The borrower often provides collateral for the borrowed share & pays a lending fee. Legal title of the share/asset is transferred to the borrower(short seller), along with voting rights & dividends – although often terms dictate borrowers pass along distributions to the lender & voting rights can be utilised if the borrow is recalled before record date  
<https://www.investopedia.com/terms/s/securitieslending.asp>
- In securities lending the predominant beneficiaries are not the lending investor. The main benefactors are the borrower (short seller) who shorts via selling the investors asset and the lending broker who receives the lending fees and often a commission for arranging the lending terms. It is important to note lending occurs between broker-dealer & borrower, not lending investor & borrower (specific to retail investors, as not FINRA members) and as such the broker-dealer receives the right to any benefit i.e. lending fees. In the event of bankruptcy & the borrower is unable to return the asset, the broker-dealer is responsible for returning the share.  
<https://www.investopedia.com/ask/answers/05/shortsalebenefit.asp>
- Additional info Securities lending FINRA <https://www.finra.org/rules-guidance/rulebooks/finra-rules/4314>
- Securities lending is often mandatory is customer agreements in Margin accounts
  - Fidelity Margin account – Mandatory agreement  
[https://www.fidelity.com/accounts/mando/margin\\_agreement.pdf](https://www.fidelity.com/accounts/mando/margin_agreement.pdf) +  
[https://www.fidelity.com/bin-public/060\\_www\\_fidelity\\_com/documents/Using\\_Margin.pdf](https://www.fidelity.com/bin-public/060_www_fidelity_com/documents/Using_Margin.pdf)

• We may sell your securities as other assets without contacting you. Some investors mistakenly believe that Fidelity would contact them if a margin call is required, or that Fidelity cannot sell securities in their accounts unless Fidelity has contacted them first. This is not the case. Fidelity may attempt to notify you of margin calls, but is not required to do so. In some cases, when Fidelity has contacted you and provided a hardship date by which you had to meet a margin call, Fidelity can still take the necessary steps to contact a financial institution prior to that date, including automatically selling the securities without notice to you. You understand that if Fidelity notifies you in advance of certain instances, Fidelity is not obligated to do so and such action will not be deemed a waiver of our rights under this agreement. You understand and agree that you are responsible for any losses in your account that may arise as a result of the action outlined above. While the property in a margin account may be pledged or repledged, hypothecated, leased or otherwise encumbered, and you may rely on it to secure any other property, but at least as to our obligations to us in writing, without our having to register the amount of interest payable to our secured creditors, we may at any time, and without notice to you, transfer any property between any of our accounts, whether individual or joint, or between any of our accounts to any account you guarantee. As permitted by law, we may also sell securities to, among other things, satisfy short sales and lending requests. For short sales and as a result of any necessary compensation to connection borrowers. Additional terms concerning margin, margin maintenance, and the agreement with "Your Commitments to Fidelity," "Eligible Securities," "Account Types," and "Service Providers," under "How" in the Disclosure Information section, and in the sometimes entitled "Important Information about Margin and Fees."

- **Fidelity can sell assets in your account without contacting you.** While Fidelity generally attempts to notify customers of margin calls, it is not required to do so. Even if you are notified, Fidelity can still sell assets before the time indicated in the notice, if it believes such action is warranted. You understand that if we contact you in advance in certain instances, we are not obligated to do so and such action will not be deemed a waiver of our rights under this agreement.
- **You are not entitled to choose which securities are sold to meet a margin call.** Because your accounts have Fidelity's collateral for no debt to you, the choice of what to sell is Fidelity's.
- **You are not entitled to a time extension as a margin call.** While Fidelity may grant you an extension, it is not required to do so. Grants by its extension on a margin call does not waive Fidelity's right to decide to grant an extension in the future.
- **Short selling is a margin account transaction and entails the same risks as described above.** Fidelity can use your account to buy securities to cover a short position without contacting you. If you don't have sufficient assets, you are responsible for the shortfall and collection costs.
- **Fidelity can loan out (to itself or others) the securities that collateralize your margin borrowing.** If it does, you may not be entitled to receive, with respect to securities that are lent, certain benefits that normally accrue to a securities owner, such as the ability to exercise voting rights, or to receive interest, dividends, or other distributions. Although you may receive substitute payments in lieu of distributions, these payments may not receive the same tax treatment as actual interest, dividends, or other distributions, and you may therefore incur additional tax liability for substitute payments. Fidelity may allocate substitute payments by lottery or in any other manner provided by law, rule, or regulation. Please note that any substitute payments Fidelity makes are voluntary, and may be discontinued at any time.

- TD Ameritrade Margin – Mandatory agreement <https://www.tdameritrade.com/retail-en-us/resources/pdf/AMTD182.pdf>



- Securities lending is a very profitable & established business of major investment banks
  - Patrick Byrne (Founder of T-Zero & Overstock) states Securities lending accounts for 75% of all of Goldman-Sachs Income - <https://www.youtube.com/watch?v=COQvMsbb-Cw>
  - \$1.235Billion Revenue from Securities Lending in May 2023 alone <https://www.spglobal.com/marketintelligence/en/mi/research-analysis/securities-finance-may-snapshot-2023.html>

**Global Securities Finance Snapshot - May 2023**

Asset Class	May Revenue (\$MM)	Rev Yr/Y %Chg	Rev YTD	Avg Balance (\$B)	Bal Yr/Y %Chg	Avg Fee	Fee Yr/Y %Chg	Avg Utilization	Util Yr/Y %Chg
All Securities	\$1,235	6%	\$5,041	\$2,560	-11%	0.57%	10%	6.1%	-5%
All Equity	\$958	2%	\$4,278	\$2,218	-9%	0.50%	10%	3.7%	-8%
American Equity	\$455	-20%	\$3,397	\$610	-2%	0.55%	11%	2.0%	-3%
Asia Equity	\$381	-1%	\$859	\$195	2%	0.58%	-1%	4.1%	-6%
EMEA Equity	\$244	-10%	\$686	\$264	-17%	1.00%	9%	5.0%	-20%
ADR	\$30	-8%	\$164	\$27	-9%	1.52%	10%	8.0%	-1%
ETF	\$55	-31%	\$271	\$99	-15%	0.65%	-15%	10.8%	-16%
Government Bond	\$568	-6%	\$836	\$1,062	-17%	0.19%	40%	10.2%	-23%
Corporate Bond	\$503	-20%	\$498	\$164	-7%	0.45%	36%	5.8%	-1%

Note: Includes only transactions with positive fees. Source: SIF Global Market Intelligence Securities Finance. © 2023 SIF Global Market Intelligence

- \$872Million Revenue from Securities lending in Nov 2023 alone <https://www.spglobal.com/marketintelligence/en/mi/research-analysis/securities-finance-november-snapshot-2023.html>

**Global Securities Finance Snapshot - Nov 2023**

Asset Class	Nov Revenue (\$M)	Rev Yr/Y %Chg	Rev YTD	Avg Balance (\$B)	Bal Yr/Y %Chg	Avg Fee	Fee Yr/Y %Chg	Avg Utilization	Util Yr/Y %Chg
All Securities	\$872	-12%	\$8,987	\$2,446	-9%	0.43%	-6%	5.8%	-24%
All Equity	\$682	-12%	\$8,087	\$2,131	-6%	0.72%	2%	5.2%	-22%
American Equity	\$350	-8%	\$4,799	\$611	-11%	0.88%	8%	3.7%	-18%
Asia Equity	\$370	8%	\$2,014	\$188	-1%	1.36%	-5%	4.2%	-2%
EMEA Equity	\$197	-6%	\$1,239	\$187	-8%	2.08%	-22%	4.8%	-15%
ADR	\$27	-8%	\$100	\$29	-7%	1.10%	18%	8.7%	-8%
ETF	\$30	-18%	\$100	\$85	-1%	0.84%	-17%	10.8%	1%
Government Bond	\$140	-12%	\$1,730	\$1,098	2%	0.18%	-15%	11.0%	-8%
Corporate Bond	\$136	-12%	\$1,008	\$370	8%	0.38%	-18%	5.1%	-8%

Note: Includes only transactions with positive fees. Source: SIF Global Market Intelligence Securities Finance. © 2023 SIF Global Market Intelligence

- Securities lending accounted for \$10.98Billion in Revenue in 2021 <https://securities.cib.bnpparibas/securities-lending-market-trends/>
- Securities lending alone offset management fees for Blackrock ETFs

**Sample of iShares ETFs with fiscal year end 3/31/2020**

Strategy	iShares ETF	Ticker	Securities lending returns as of fiscal year end 3/31 (bps)			As of 3/31/2020	
			2018	2019	2020	Mgmt. fee	Mgmt. fee offset by lending
Small Cap US	iShares Russell 2000 Growth ETF	IWO	25	22	24	24	102%
	iShares Russell 2000 ETF	IWM	20	15	17	10	80%
	iShares Russell 2000 Value ETF	IWN	14	8	11	24	45%
	iShares S&P Small-Cap 600 Value ETF	IJS	14	8	8	25	32%
	iShares Core S&P Small-Cap ETF	IIR	10	8	6	6	104%
	iShares S&P Small-Cap 600-Growth ETF	IJT	7	7	6	25	23%
Sector	iShares Nasdaq Biotechnology ETF	IBB	13	11	13	67	29%

- IWM (Russel 2000 ETF – Prev contained GME with significant FTDs at Jan 21) Advertised as consistent return on securities lending via ETF <https://www.institutionalinvestor.com/article/2bsx1d6rqbm4mwnw7t0qo/innovation/funding-potential-yield-in-etf-securities-lending>



### Historical Lending Yields and On-Loan% for IWM unit



- Dr Trimboth SEC Comment <https://www.sec.gov/comments/s7-32-10/s73210-315714.htm>
- Securities lending is advertised to retail as a method of creating extra income from shares – the fact that the shares are actively devalued by lending the asset to short sellers to sell is heavily minimised <https://www.fidelity.com/trading/fully-paid-lending>



- Redditor explanation regarding Securities lending & Blackrock's lending program (Largest institutional GME shareholder) [https://www.reddit.com/r/Superstonk/comments/ox8f3x/lets\\_talk\\_about\\_blackrocks\\_security\\_lending/](https://www.reddit.com/r/Superstonk/comments/ox8f3x/lets_talk_about_blackrocks_security_lending/)
- Investment Manager (Kevin Malone) – receiving Cold call from Schwab representative asking to participate in securities lending for GME [https://twitter.com/Malone\\_Wealth/status/1620252868887605250](https://twitter.com/Malone_Wealth/status/1620252868887605250)

### FULLY-PAID-FOR-ACCOUNT AT NSCC(DTCC SUBSIDIARY) FOR LOCATES

- DTCC Explanation - The Fully-Paid-for-Account is a special sub-account within NSCC's Continuous Net Settlement (CNS) System that assists participants in maintaining compliance with possession and control requirements pursuant to Rule 15c3-3 of the Securities Exchange Act. The Fully-Paid-for-Account allows Members to deliver institutional transactions via DTC using customer fully-paid-for securities in anticipation that they will receive these securities from CNS. <https://www.dtcc.com/clearing-services/equities-clearing-services/the-fully-paid-for-account>
- Members instruct NSCC to move their expected long allocations (FTD/FTR) from the general CNS(Continuous Net Settlement) "A" subaccount into a fully-paid-for location (the "E" subaccount) and are then permitted to use customer fully-paid-for positions to complete institutional deliveries in DTC.
  - As Members instruct NSCC to move expected long allocations to the fully-paid-for location, NSCC reclassifies the relevant long allocations as a fully-paid-for long

- allocation and debits the Member the market value of the relevant securities in the NSCC settlement system.
- The funds associated with the fully-paid-for process are collected via NSCC's end-of-day settlement process and are held by NSCC and used to ensure the customer fully-paid-for positions can be replaced should the Member become insolvent.
  - Upon completion of a fully-paid-for long allocation, the relevant funds are used to pay for the securities received from CNS via NSCC's end-of-day settlement process.
- If the receiving broker-dealer in a transaction receives a FTR they can utilise the Fully-Paid-For lending service to convert the FTR into a customer-fully-paid position to fulfill the stock transaction at DTCC (i.e. fill the transaction without receiving stock). The FTR broker receives the market value of the stock that replicates the stock price movement & the NSCC becomes the counterparty that guarantees the FTR position. The received collateral by the receiving broker (the stock market value) can be netted out with other obligations in the Continuous Net Settlement system.
  - The delivering broker that FTD benefits as there is less incentive for the FTR receiving broker to force a mandatory buy-in as they benefit from receiving funds that can be netted against their own obligations & the NSCC will automatically locate & fill the order. Thus the delivering broker can short shares reliably without locating/borrowing prior & rely on FTDs.
  - Redditor summary & explanation of possible activity utilising Fully-paid-for account [https://www.reddit.com/r/Superstonk/comments/rb42h6/the dtcc has a program that allows any broker/](https://www.reddit.com/r/Superstonk/comments/rb42h6/the_dtcc_has_a_program_that_allows_any_broker/)
  - Further explanation in comment of Redditor post <https://www.reddit.com/r/Superstonk/comments/rb42h6/comment/hnntf3x/>
  - Nomura 2022 Disciplinary action FINRA – Regularly engaged in Reverse Repo with NSCC for positions held under Nomura's name (moved into a Bank of Japan account) from 2019-2021 ranging in transactions up to \$1.95 Billion USD. – allowed to not admit guilt, a \$125,000 'fine' and a 'censure' [https://www.finra.org/sites/default/files/fda\\_documents/2021071932301%20Nomura%20Securities%20International%2C%20Inc.%20CRD%204297%20AWC%20lp%20%282023-1676247599239%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2021071932301%20Nomura%20Securities%20International%2C%20Inc.%20CRD%204297%20AWC%20lp%20%282023-1676247599239%29.pdf)

#### LENDING CUSTOMER'S CASH ACCOUNT RELATED POSITIONS (IN ADDITION TO LEGAL MARGIN ACCOUNT POSITIONS)

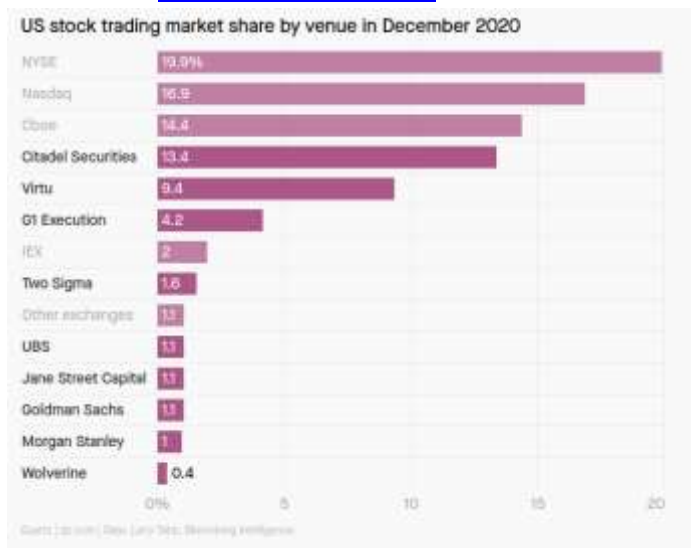
- Wes Christian (Attorney with successful claims against DTCC/Brokers & assisted in RegSHO creation) AMA discussing identified cases of brokers using customers cash accounts in addition to margin accounts (6minute mark onwards, quote at 8:45) <https://www.youtube.com/watch?v=2rJujnpKiqM>
- Credit Suisse 2022 Disciplinary action FINRA – 2011-2019 Violated segregation rules & failed to maintain possession/control of billions of fully-paid securities & excess margin securities. Failed to maintain appropriate segregated customer reserves. From 1997-2020 had poor electronic recordkeeping, with over 18.6Billion records not kept in an unerasable/editable manner. – Allowed to consent without admitting guilt, \$9million 'fine', a 'censure' & agree to implement supervisory guidelines in 180days [https://www.finra.org/sites/default/files/fda\\_documents/2018059446101%20Credit%20Suisse%20Securities%20%28USA%29%20LLC%20CRD%20816%20AWC%20sl%20%282022-1645316402747%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2018059446101%20Credit%20Suisse%20Securities%20%28USA%29%20LLC%20CRD%20816%20AWC%20sl%20%282022-1645316402747%29.pdf)

#### DARK POOLS / ATS / WHOLESALER / SINGLE DEALER PLATFORM

- When a stock order is made by an investor, the broker dealer has to route the order to an execution venue (location where order is transacted)

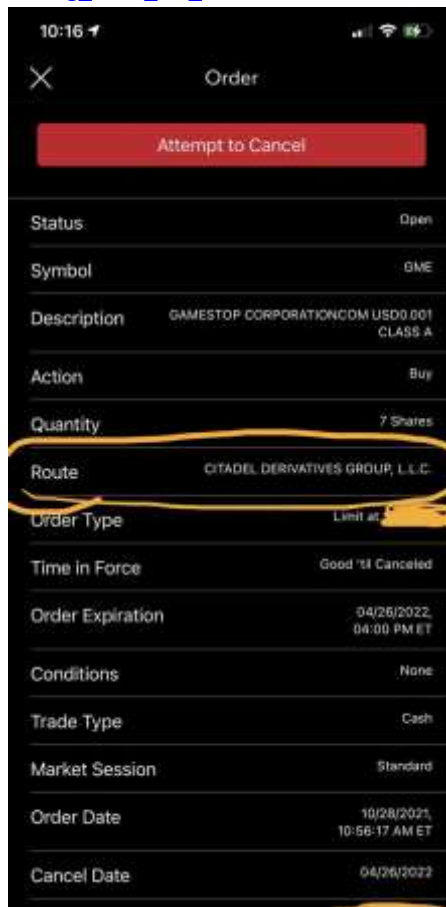
- Types of execution venues (NMS Exchange / ATS / SDP / Wholesaler)
  - <https://www.finra.org/investors/insights/where-do-stocks-trade>
    - NMS (National Market System) Exchange ('Lit' Markets)– NYSE/NASDAQ/CBOE Etc
      - Trades are publicly visible & recorded on consolidated tape, only listed stocks allowed, Registered with SEC & defined by 1934 Securities Act, also Self Regulatory Organisations
      - List of NMS Exchanges <https://www.sec.gov/rules/sro>
    - ATS – Alternate Trading System + Dark Pools – 'Dark'
      - An alternative exchange, reduced regulatory requirements (via Regulation ATS), may trade unlisted stocks (OTC), not SRO, not obliged to provide price quotations
      - Dark Pools are ATS that doesn't publicly display buy/sell price or number of shares traded, only obliged to report trades not price quotations to FINRA
      - List of ATS <https://www.sec.gov/foia/docs/atlist>
    - SDP – Single Dealer Platform – 'Dark'
      - A Broker-Dealer that routes to itself to act as the counterparty to every transaction – i.e. rather than send to another exchange the Broker-Dealer transacts the order with other customers orders or it's own inventory of stock.
      - Not registered as an ATS or Exchange
      - No publicly visible price quotations (buy/sell/number of shares traded) and significantly reduced regulatory requirements comparatively
      - SDP's in US <https://blog.themistrading.com/2020/12/14434/>
        - Citadel Securities – Citadel Connect
        - Virtu Americas – VEQ Link
        - Jane Street – JX
        - IMC
        - HRT
    - Wholesaler – 'Dark'
      - Broker-dealer that acts as a market maker (firm that actively quotes two-sided markets in a particular security) for other broker-dealers
      - Not registered as an ATS or Exchange
      - No publicly visible price quotations (buy/sell/number of shares traded) and significantly reduced regulatory requirements comparatively
      - Most retail broker-dealers, route ALL or a significant portion of their orders to one or more wholesalers. A wholesaler's business is to execute those orders, which may involve executing the orders itself or further routing to other venues.
      - Retail-brokers receive commissions/rebates for sending retail investor orders to Wholesalers, termed 'Payment for Order Flow' PFOF. Wholesalers pay PFOF to gain access to retail orders & be able to transact on retail orders before other market participants. They can transact with their own inventory (internalisation) & decide on which orders are filled & which orders are sent to 'lit' markets – impacting the price. (SEC proposal – Increase Competition rule <https://www.sec.gov/news/press-release/2022-225> + <https://www.sec.gov/files/rules/proposed/2022/34-96495.pdf> )
      - Wholesalers account for 66% of all retail order flow (retail orders are routed)
      - 2 largest wholesalers are Citadel Securities & Virtu, both have proprietary Hedgefunds (both the top 5 successful hedgefunds in history)

- Citadel Securities Charged by SEC for not executing Retail orders at best price in Wholesale business 2017 – settled without guilt, fine \$22million & a ‘censure’ <https://www.sec.gov/news/press-release/2017-11>
- SEC alleges Virtu (2<sup>nd</sup> largest market maker) shared customers trading data (positions etc) with it’s proprietary trading firm (Virtu Financials) for it’s own proprietary trading via two generic accounts accessible to virtually all its staff, between 2018-2019 whilst claiming strict safeguarding & separation of information <https://www.sec.gov/news/press-release/2023-176>
- SEC Chair explanation regarding Wholesalers - <https://www.sec.gov/news/speech/office-hours-gary-gensler-dark-pools-payment-order-flow-market-structure> + [https://www.youtube.com/watch?v=2HSWM3fKIdY&list=PLrB8PjaXSV6vWI2NrPjg\\_hfvCehCrT7Kjo&index=19](https://www.youtube.com/watch?v=2HSWM3fKIdY&list=PLrB8PjaXSV6vWI2NrPjg_hfvCehCrT7Kjo&index=19)



- ‘Dark Pool’ – Off exchange trading at a private ATS in which investors can trade without transactions exposed to the lit market (NMS System that derives the Share Price Quotation) until the transaction is complete <https://www.investopedia.com/terms/d/dark-pool.asp>
  - i.e. allows Dark Pool participants to trade without orders affecting the share price (until complete & recorded on tape – ledger of all trades) – thus trades are kept in the ‘Dark’
  - Previously used only for large orders by institutional investors (as price would move before selling/buying the whole order), however now there is a larger propensity for small orders including orders of 1 share volume
  - SDP & Wholesalers also operate ‘dark’ markets in which orders can trade before price is exposed. Both are even more opaque than ATS Dark pools as only the Wholesaler or SDP Broker-dealer has visibility of which orders & prices are available
  - Dark pools owners can allow their own proprietary traders to utilise Dark pool data. May offer special privileges to specific customers such as no exposure to HFT firms for certain orders – SEC remarks regarding ATS & Misuse <https://www.sec.gov/news/statement/shedding-light-dark-pools>
- Redditor Analysis of Citadel & SDP in relation to SEC Rule proposals [https://www.reddit.com/r/Superstonk/comments/11fjn2m/siege\\_of\\_the\\_citadel\\_part\\_1\\_welcome\\_to\\_the/](https://www.reddit.com/r/Superstonk/comments/11fjn2m/siege_of_the_citadel_part_1_welcome_to_the/)
- Jon Stewart Video on Dark Pools <https://www.youtube.com/watch?v=bP74RBTE8kI>
- Evidence of Retail Broker-Dealers forcing routing to Citadel (Wholesalers) despite instruction to route to another specific exchange (i.e. IEX)

- Evid Fidelity force change routing from IEX to Citadel  
[https://www.reddit.com/r/Superstonk/comments/r81j9i/why\\_is\\_fidelity\\_changing\\_my\\_routing\\_from\\_ixe\\_to/](https://www.reddit.com/r/Superstonk/comments/r81j9i/why_is_fidelity_changing_my_routing_from_ixe_to/)



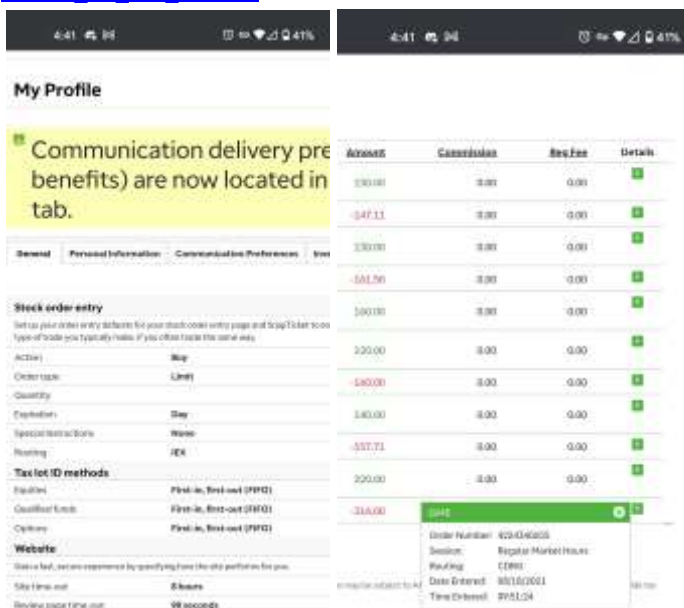
- Evid investor order via Fidelity – directed to Citadel  
[https://www.reddit.com/r/Superstonk/comments/pbbfuv/fidelity\\_routing\\_buy\\_orders\\_through\\_citadel/](https://www.reddit.com/r/Superstonk/comments/pbbfuv/fidelity_routing_buy_orders_through_citadel/)



- Evid Fidelity claim no PFOF & Investor attempting to route away from Citadel (only available if pays extra for investor trader 'pro' on Fidelity)  
[https://www.reddit.com/r/fidelityinvestments/comments/10r0s32/is\\_there\\_anyone\\_to\\_route\\_stop\\_market\\_order/](https://www.reddit.com/r/fidelityinvestments/comments/10r0s32/is_there_anyone_to_route_stop_market_order/)
- Evid TD Ameritrade routes to Citadel despite request to route to IEX  
[https://www.reddit.com/r/Superstonk/comments/p7q66p/i\\_can\\_confirm\\_that\\_td\\_does\\_route\\_orders\\_through/](https://www.reddit.com/r/Superstonk/comments/p7q66p/i_can_confirm_that_td_does_route_orders_through/)
- Evid ThinkorSwim (TD Broker) routes via Citadel to reach IEX, despite request for IEX only  
[https://www.reddit.com/r/thinkorswim/comments/p8eb2k/so\\_why\\_is\\_it\\_misrepresented\\_as\\_direct\\_routing\\_if/](https://www.reddit.com/r/thinkorswim/comments/p8eb2k/so_why_is_it_misrepresented_as_direct_routing_if/)



- More Evid for TD Ameritrade with images of order & confirmation of request via IEX  
[https://www.reddit.com/r/Superstonk/comments/p7jzq0/got\\_a\\_response\\_from\\_td\\_ameritrade\\_on\\_the\\_trades/](https://www.reddit.com/r/Superstonk/comments/p7jzq0/got_a_response_from_td_ameritrade_on_the_trades/)



- More evid TD route through Citadel despite request with screenshot prior & post transaction  
[https://www.reddit.com/r/GMEJungle/comments/p6smz2/gme\\_order\\_instructed\\_to\\_be\\_routed\\_through\\_iex\\_but/](https://www.reddit.com/r/GMEJungle/comments/p6smz2/gme_order_instructed_to_be_routed_through_iex_but/)

Status	Action	Quantity	Symbol	Type	Price	Act. Price	Time-in-Force	Reported
Filled	Buy	20	GME	Limit	159.00	--	--	09:45:08/08/18/21

Date/Time	Description	Amount	Commission	Reg Fee	Details
08/11/2021 16:24:16	CLIENT REQUESTED ELECTRONIC FUNDING RECEIPT (FUNDS NOW)	3,100.00	0.00	0.00	
08/18/2021 09:45:09	Bought 20 GME @ 159	-3,180.00			

- Citadel Securities unsuccessfully attempts to sue IEX & SEC on D-Limit Order type (aimed to prevent front running by HFT) <https://www.bloomberg.com/news/articles/2022-07-29/citadel-securities-loses-court-bid-to-block-iex-order-type>

**DESIGNATED MARKET MAKER STATUS**

- Market maker – an individual participant or member firm of an exchange that buys & sells securities for its own account & ‘makes a market’. Creates bids & asks in order to maintain liquidity (ability to sell/buy at a certain price). Profits by managing spread (gap of price between bid & ask)
- ‘Many exchanges use a system of market makers, who compete to set the best bid or offer so they can win the business of incoming orders. But some entities, such as the [New York Stock Exchange \(NYSE\)](#), have what's called a [designated market maker \(DMM\)](#) system instead. Once referred to as [specialist](#) systems, DMMs are essentially lone market makers with a monopoly over the order flow in a particular security or securities. Because the NYSE is an [auction market](#), bids and asks are competitively forwarded by investors.’ (<https://www.sec.gov/fast-answers/answersspecialist> )
- Citadel is Designated Market Maker for GameStop (confirmed April 2024) as evidenced by NYSE Group Equity Security Master File (Accessible via NYSE Master File – <https://www.nyse.com/market-data/reference/nyse-group-security-master> -> <https://ftp.nyse.com/Reference%20Data%20Samples/> -> <https://ftp.nyse.com/Reference%20Data%20Samples/NYSE%20GROUP%20SECURITY%20MASTER/> Note as per PDF Specification document v4.04 item 20 = Designated MM)

20	Security Listing & Trading Specification	DMM Firm Name	Designated Market Maker (DMM) firm name for NYSE-listed securities and Electronic Designated Market Maker (eDMM) firm name for NYSE American-listed securities. Applies to NYSE and NYSE American-listed securities only. Default as blank for the remaining securities.
----	--	---------------	---

- [https://www.reddit.com/r/Superstonk/comments/sgltge/citadel\\_iswas\\_the\\_designated\\_market\\_maker\\_for\\_gme/](https://www.reddit.com/r/Superstonk/comments/sgltge/citadel_iswas_the_designated_market_maker_for_gme/)
- (Dec 2022 List) [https://ftp.nyse.com/Reference%20Data%20Samples/NYSE%20GROUP%20SECURITY%20MASTER/NYSEGROUP\\_US\\_REF\\_SECURITYMASTER\\_EQUITY\\_4.0\\_20221201.txt](https://ftp.nyse.com/Reference%20Data%20Samples/NYSE%20GROUP%20SECURITY%20MASTER/NYSEGROUP_US_REF_SECURITYMASTER_EQUITY_4.0_20221201.txt)
- (April 2024 List) [https://ftp.nyse.com/Reference%20Data%20Samples/NYSE%20GROUP%20SECURITY%20MASTER/NYSEGROUP\\_US\\_REF\\_SECURITYMASTER\\_EQUITY\\_4.0\\_20240328.txt](https://ftp.nyse.com/Reference%20Data%20Samples/NYSE%20GROUP%20SECURITY%20MASTER/NYSEGROUP_US_REF_SECURITYMASTER_EQUITY_4.0_20240328.txt)

- o Dec 2022 List:

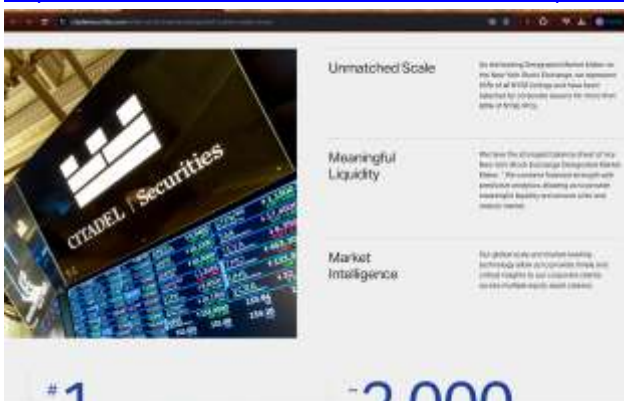


- o April 2024 List:



- o Citadel as DMM for 65% of all NYSE listings & >80% NYSE IPO

<https://www.citadelsecurities.com/what-we-do/equities/designated-market-maker-dmm/>



- o Citadel CEO Ken Griffin on role of Market Maker <https://www.youtube.com/watch?v=eVfxEBE-nl4&t=158s>
- o Citadel CEO Ken Griffin admits Citadel & other investment firms set the price <https://www.thestreet.com/memestocks/others/citadels-ken-griffin-why-markets-are-efficient>  
<https://www.youtube.com/watch?app=desktop&si=SKM9cPX9c70xKpOZ&v=FID0BLkZxuY&feature=youtu.be>

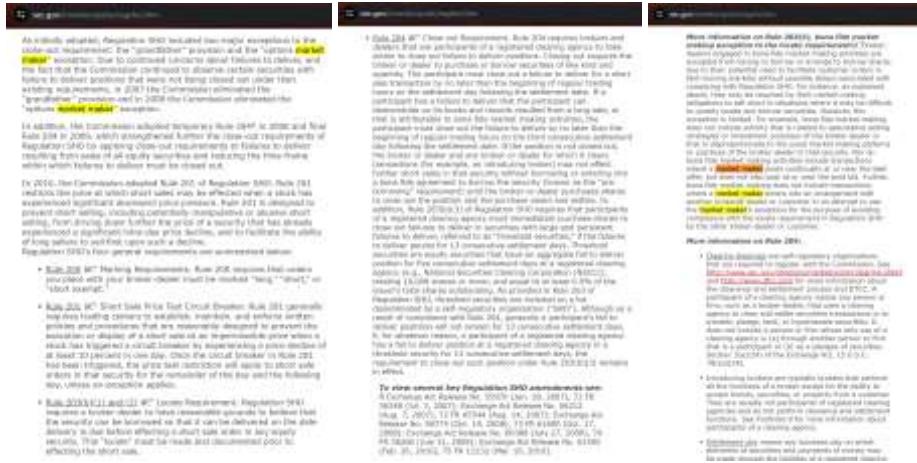


- Market Maker Explanation Investopedia  
<https://www.investopedia.com/terms/m/marketmaker.asp>
- Designated Market Maker Explanation Investopedia  
<https://www.investopedia.com/terms/d/designated-market-maker-dmm.asp#:~:text=Formerly%20known%20as%20specialists%2C%20the,buying%20and%20selling%20imbalances%20occur.>
- NYSE DMM / Specialist definition <https://www.nasdaq.com/glossary/s/specialist> On an [exchange](#), the [member firm](#) that is designated as the [market maker](#) (or [dealer](#) for a [listed common stock](#)). Member of a [stock exchange](#) who maintains a "fair and orderly market" in one or more [securities](#). Only one [specialist](#) can be designated for a given [stock](#), but dealers may be specialists for several stocks. In contrast, there can be multiple market makers in the [OTC market](#). Major functions include [executing limit orders](#) on behalf of other exchange members for a portion of the [floor broker's commission](#), and [buying](#) or selling for the specialist's own account to counteract temporary [imbalances](#) in supply and demand and thus prevent wide swings in stock [prices](#).
- NYSE DMM Info sheet – DMMs help to establish the right opening price to minimize early-morning volatility.  
[https://www.nyse.com/publicdocs/nyse/markets/nyse/designated\\_market\\_makers.pdf](https://www.nyse.com/publicdocs/nyse/markets/nyse/designated_market_makers.pdf)
- SEC alleges Virtu (2<sup>nd</sup> largest market maker) shared customers trading data (positions etc) with it's proprietary trading firm (Virtu Financials) for it's own proprietary trading via two generic accounts accessible to virtually all its staff, between 2018-2019 whilst claiming strict safeguarding & separation of information <https://www.sec.gov/news/press-release/2023-176>
- Citadel claims to have two separate legal entities – a Hedge fund and a Market Making arm. Citadel's hedgefund is the second most profitable hedgefund in history - \$74billion in net gains since launch & record for largest single year profits in 2023 - \$16billion (Note Bernie Madoff's Hedgefund was most profitable at time with \$65billion at collapse – investigated by Harry Markopolos for statistically improbable yearly profits – refer to Markopolos speech & Madoff documentary) <https://www.bloomberg.com/news/articles/2023-01-05/ken-griffin-s-citadel-securities-posts-record-revenue-hedge-fund-surges> + <https://www.bloomberg.com/news/articles/2024-02-22/citadel-makes-more-than-4-billion-from-commodities-in-2023> + <https://www.ft.com/content/10cdafc9-c906-45af-bf0f-21776cef3dc1>
- Confessions of a Market maker – Market Maker Manipulation techniques  
<https://www.youtube.com/watch?v=NTdgSUqUBWA> + <https://www.youtube.com/watch?v=LnOZRQ6XzDg>
- Redditor analysis of Citadel's empire  
[https://www.reddit.com/r/Superstonk/comments/o2xz48/the\\_sun\\_never\\_sets\\_on\\_citadel\\_part\\_1/](https://www.reddit.com/r/Superstonk/comments/o2xz48/the_sun_never_sets_on_citadel_part_1/) + [https://www.reddit.com/r/Superstonk/comments/od4bb1/the\\_sun\\_never\\_sets\\_on\\_citadel\\_part\\_2/](https://www.reddit.com/r/Superstonk/comments/od4bb1/the_sun_never_sets_on_citadel_part_2/)

#### BONA FIDE MARKET MAKER / BONA FIDE MARKET MAKER EXEMPTIONS

- Broker-Dealers could claim Bona Fide Market maker status by fulfilling exchange set market maker criteria (limited SEC guidance in early 2021, only further clarified to FINRA in 2023), with criteria fulfilled Broker-Dealers are able to use Bona-Fide Market Maker exemption to 'legally' naked short shares

- o RegSHO Market maker exemptions – Major exemptions – Bonafide Market Making exemption – Bona Fide Market makers are not required to locate/borrow shares before short selling (i.e. Naked short selling) as they need to provide ‘liquidity’ (Direct from SEC in RegSHO, justifies as not abusive or illegal short selling – Note has since clarified “bona fide market making does not include activity that is related to speculative selling strategies or investment purposes of the broker-dealer or that is disproportionate to the usual market making patterns or practices of the broker-dealer in that security. Nor do bona fide market making activities include transactions where a market maker posts continually at or near the best offer, but does not also post at or near the best bid. Further, bona fide market making does not include transactions where a market maker enters into an arrangement with another broker-dealer or customer in an attempt to use the market maker’s exception for the purpose of avoiding compliance with the locate requirement in Regulation SHO by the other broker-dealer or customer.” Other exemptions - Grandfathering exemption (supposedly closed 2007) & Options making exemption (supposedly closed 2008) <https://www.sec.gov/investor/pubs/regsho.htm>



- o FINRA 2023 Clarifications re: Market Maker Exemptions (Newly added 2023) – ‘reliance on and compliance with an exchange’s market making designation and quoting requirements does not PER SE qualify a market maker for the bona fide market maker exception. Only market makers engaged in bona-fide market making in the security at the time they effect the short sale may rely on the exception.’ ‘For a "hard to borrow" security or a threshold security, however, a broker-dealer may not re-apply a locate for intraday buy to cover trades.’<sup>4</sup> SEC guidance has explained that, without obtaining locates prior to each short sale in hard to borrow or threshold securities, it is unlikely that a broker-dealer

executing short sales in such securities would have reasonable grounds to believe that the securities can be borrowed so that they can be delivered on the date that delivery is due on each trade.<sup>5</sup> <https://www.finra.org/rules-guidance/guidance/reports/2023-finras-examination-and-risk-monitoring-program/regulation-sho>



- Citadel Securities, Securities Sold Not yet Purchased, 'Fair value' at \$45.7 billion in 2022, \$65.7 Billion in 2021

[https://www.sec.gov/Archives/edgar/data/1146184/000114618423000003/CDRG\\_BS\\_Only\\_2022.pdf](https://www.sec.gov/Archives/edgar/data/1146184/000114618423000003/CDRG_BS_Only_2022.pdf) +

[https://www.sec.gov/Archives/edgar/data/1146184/000128417022000004/CDRG\\_BS\\_Only\\_FS\\_2021.pdf](https://www.sec.gov/Archives/edgar/data/1146184/000128417022000004/CDRG_BS_Only_FS_2021.pdf)

- Fun fact – Market maker exemptions were colloquially known as 'Madoff Exemptions' by SEC Officials as they were implemented in conjunction with Bernie Madoff <https://www.reuters.com/article/idUSTRE4BG6US/>
- Evid of MM Abuse of Naked short selling & MM Exemption with Knight Capital Group & Whistleblower – Ultimately charged by FINRA for abusive naked shorting & fined \$105,000 (Yes that's it) & a 'censure', no SEC action <https://theintercept.com/2016/12/15/whistleblower-vindicated-massive-trading-firm-knight-capital-charged-with-abusing-naked-shorts/>
- Whistleblowers Series of articles on MM abuse (Knight capital Group) <https://theintercept.com/series/penny-stock-chronicles/>
- KCG direct cause of 2010 'Flash Crash' resulting from millions of orders sent by KCG algorithm within 45min in response to only 212 customer orders (altered algorithms coding causing 'error') <https://www.sec.gov/news/press-release/2013-222>
- Knight Capital Group Market making sector purchased by Citadel Securities 2016 <https://www.ft.com/content/de41612e-cc3d-11e5-be0b-b7ece4e953a0>
- Knight Capital Group purchased/merged by Virtu Financial (Second largest MM after Citadel) in 2017 <https://www.reuters.com/article/idUSKBN17M1EH/>

- Citadel – all disciplinary actions & misconduct (74 officially charged items)  
[https://files.brokercheck.finra.org/firm/firm\\_116797.pdf](https://files.brokercheck.finra.org/firm/firm_116797.pdf)
- Virtu - all disciplinary actions & misconduct (54 officially charged items)  
[https://files.brokercheck.finra.org/firm/firm\\_149823.pdf](https://files.brokercheck.finra.org/firm/firm_149823.pdf)
- Redditor analysis of bona fide & prev MM exemptions  
[https://www.reddit.com/r/GME/comments/mh6lnz/the\\_naked\\_shorting\\_scam\\_update\\_selling\\_nude\\_like/?utm\\_source=share&utm\\_medium=web2x&context=3](https://www.reddit.com/r/GME/comments/mh6lnz/the_naked_shorting_scam_update_selling_nude_like/?utm_source=share&utm_medium=web2x&context=3)
- Ascendant Capital FINRA violation of Bona Fide MM Privilege 2015 – No admission of guilt, fine \$35,000 & censure  
[https://www.finra.org/sites/default/files/fda\\_documents/2015045508801%20Ascendant%20Capital%20Markets%2C%20LLC%20CRD%20152912%20AWC%20DM%20%282021-1631838027825%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2015045508801%20Ascendant%20Capital%20Markets%2C%20LLC%20CRD%20152912%20AWC%20DM%20%282021-1631838027825%29.pdf)

### HIGH FREQUENCY TRADING (HFT) / AI CONTROLLED ALGORITHMS

- Trading utilising powerful computers & algorithms to send orders at unfathomable speeds (up to trillionth of a second - picoseconds) <https://www.investopedia.com/terms/h/high-frequency-trading.asp> – The method relies on the analysing multiple exchanges & purchasing/selling based on incoming orders. As an order has to physically travel to each exchange from the requesting bank/broker, there is always a delay (in microseconds) before the order reaches every exchange. HFT occurs at such speeds that they can purchase/sell the underlying asset in the incoming order before it has time to reach each exchange and reduce/increase supply->price before the order is fulfilled, essentially front running the order (Latency arbitrage – profiting via leveraging the differences in latency between exchanges & difference in incoming order).
- HFT firms pay Exchanges for closer access to the Exchange market centres / enhanced data streams / faster order processing to minimise the time their orders take compared to other institutions/individuals – creating unequal access to the market  
[https://listingcenter.nasdaq.com/rulebook/nasdaq/rules/nasdaq-equity-7#section\\_125\\_access\\_and\\_redistribution\\_fee](https://listingcenter.nasdaq.com/rulebook/nasdaq/rules/nasdaq-equity-7#section_125_access_and_redistribution_fee) + <https://www.reuters.com/business/finance/us-exchanges-defeat-high-frequency-trading-lawsuit-2022-03-28/>



- Brad Katsuyama (IEX CEO) – Explains use of HFT by large firms & latency arbitrage  
<https://www.youtube.com/watch?v=0eqqCwhPlyU>
- 'Flash Boys: A Wall Street Revolt' By Michael Lewis - Detailed book describing the discovery of phenomena by Brad Katsuyama, the arms race by HFT firms to create faster & faster speeds and creation of IEX Exchange to artificially slow orders such that orders reach all exchanges at the same time <https://www.amazon.com.au/Flash-Boys-Wall-Street-Revolt/dp/0393351599>
- 2010 'Flash Crash' caused by HFT at Knight Capital resulting from millions of orders sent by KCG algorithm within 45min in response to only 212 customer orders (altered algorithms coding causing 'error') <https://www.sec.gov/news/press-release/2013-222>

- Citadel largest HFT firm in the World <https://www.insidermonkey.com/blog/10-biggest-hft-firms-in-the-world-586528/?singlepage=1>
- Citadel utilising HFT 2023 – Charged by South Korea regulators for misuse <https://www.reuters.com/business/finance/skorea-fines-citadel-securities-stock-algorithm-trading-breaches-2023-01-27/>
- Citadel's 2 HFT algorithms – FastFill + SmartProvide– reddit summary - [https://www.reddit.com/r/Superstonk/comments/uuqcg6/citadel\\_algos\\_exposed\\_creating\\_arbitrage\\_to\\_steal/](https://www.reddit.com/r/Superstonk/comments/uuqcg6/citadel_algos_exposed_creating_arbitrage_to_steal/) source - <https://clsbluesky.law.columbia.edu/2017/05/05/the-citadel-settlement-off-exchange-market-makers-and-giant-brokerages/#ftn5>

### SPOOFING / LAYERING

- An illegal manipulative technique used via HFT by placing orders (asks/bids) and cancelling before being filled in order to attempt to raise/lower the price [https://en.wikipedia.org/wiki/Layering\\_\(finance\)](https://en.wikipedia.org/wiki/Layering_(finance)) / <https://capital.com/layering-definition/> / <https://www.cnbc.com/2015/04/22/flash-crash-course-what-is-layering-commentary.html>
  - i.e. HFT wants to reduce price of stock – sends sell order below ask price, reduces best ask price as other participants reduce ask price as they see sell orders, HFT cancels & can repeat process until prices are low enough before purchasing at the reduced price
- Bank Of America (BoFA) Charged for Spoofing 2023 by FINRA – Spoofing activity from 2014-2022 – allowed to not admit guilt, \$24million 'fine' & a 'censure' [https://www.finra.org/sites/default/files/fda\\_documents/2019063152203%20BofA%20Securities%2C%20Inc.%20CRD%20283942%20AWC%20gg%20%282023-1703981990849%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2019063152203%20BofA%20Securities%2C%20Inc.%20CRD%20283942%20AWC%20gg%20%282023-1703981990849%29.pdf)
- Evid of occurrence – SEC charges HFT firm 2017 <https://www.sec.gov/news/press-release/2017-63>
- Video of Spoofing GME - [https://www.reddit.com/r/Superstonk/comments/t62gy2/3322\\_gme\\_spoofing\\_report\\_when\\_the\\_price\\_started/](https://www.reddit.com/r/Superstonk/comments/t62gy2/3322_gme_spoofing_report_when_the_price_started/) + <https://www.youtube.com/watch?v=dkY0xmKCSP8> (Saved in folder)
- Another Redditor noticing spoofing [https://www.reddit.com/r/Superstonk/comments/t0nqtc/hey\\_doj\\_and\\_sec\\_might\\_we\\_call\\_this\\_spoofing/](https://www.reddit.com/r/Superstonk/comments/t0nqtc/hey_doj_and_sec_might_we_call_this_spoofing/)

### PAYMENT FOR ORDER FLOW (PFOF)

- Broker-Dealer is compensated for sending/routing orders to a specific market maker i.e. when a retail investor sends an order to purchase stock, the order is sent to a market maker before reaching an exchange where the order can be internalised (order filled by market maker's stock) before other market participants see the order on an exchange. The Market Maker pays the broker for the 'privilege' to manage the order. Note the largest market maker & sole designated market maker for GME, Citadel also has an active hedge fund. 2 Market makers account for >66% of all order flow for retail. PFOF was started by Bernie Madoff.
- Investopedia explanation <https://www.investopedia.com/terms/p/paymentoforderflow.asp#:~:text=Key%20Takeaways,prices%20and%20greater%20market%20liquidity.>
- Need for reform – SEC Rule proposal Order competition to reduce benefits of PFOF (prevents internalisation prior to reaching an exchange) <https://www.sec.gov/rules/2022/12/order-competition-rule>  
Better Markets SEC Comment <https://www.sec.gov/comments/s7-31-22/s73122-20163089-333076.pdf>

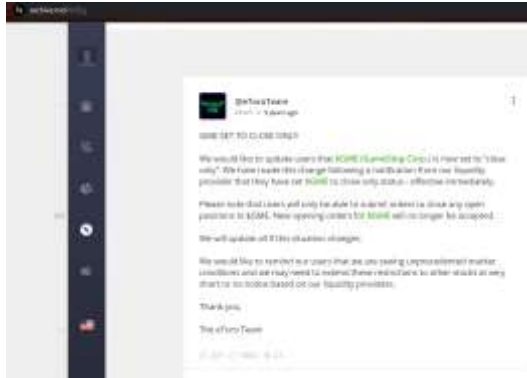
Rule Proposal Full <https://www.sec.gov/files/rules/proposed/2022/34-96495.pdf>  
 ‘Competition for Retail Order Flow Paper’ Edwin Hu 8/6/22, Paper referenced in SEC Rule Proposal for ‘two market-makers internally executed 70% of retail orders between 2017-2021 (\$70 trillion; 19% of total volume)’

[https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4070056](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4070056)

- Redditor analysing PFOF paper  
[https://www.reddit.com/r/Superstonk/comments/oidza1/the\\_bad\\_ugly\\_of\\_payment\\_for\\_order\\_flow\\_citadel\\_a/](https://www.reddit.com/r/Superstonk/comments/oidza1/the_bad_ugly_of_payment_for_order_flow_citadel_a/)
- Citadel asking to ban PFOF in SEC Comment 2004 before becoming the largest Market Maker  
<https://www.sec.gov/files/rules/concept/s70704/citadel04132004.pdf>
- Ken Griffin CEO Citadel 2021 says happy to ban PFOF, is a ‘cost’ to him  
<https://www.youtube.com/watch?v=ddXMLb3VMis/>  
<https://markets.businessinsider.com/news/currencies/citadel-ken-griffin-payment-for-order-flow-ban-crypto-regulation-2021-10>

#### POSITION CLOSE ONLY (PCO) / HALTING BUYING ONLY

- When a broker-dealer restricts customers buying a certain asset, but not selling – the underlying effect causes an increase in supply of the targeted asset & results in a drop in price of said asset
- Unprecedented position close only forced on retail investors via retail brokers in Jan 2021 for several retail-orientated sticks
  - Majority of Retail broker-dealers involved operated with PFOF with market makers / clearing firms (i.e. Citadel Securities, Virtu, Apex Clearing)
- Extensive Reddit list with screenshots/articles/communications of brokers that forced PCO / Purchase limits / had technical difficulties /  
[https://www.reddit.com/r/stocks/comments/l8rhr3/weekend\\_gme\\_thread\\_homework\\_for\\_all\\_lets\\_stop/](https://www.reddit.com/r/stocks/comments/l8rhr3/weekend_gme_thread_homework_for_all_lets_stop/) (Archived with all links <https://archive.md/EGGOI> AND [https://web.archive.org/web/20230130022301/https://www.reddit.com/r/stocks/comments/l8rhr3/weekend\\_gme\\_thread\\_homework\\_for\\_all\\_lets\\_stop/](https://web.archive.org/web/20230130022301/https://www.reddit.com/r/stocks/comments/l8rhr3/weekend_gme_thread_homework_for_all_lets_stop/) AND Folder Broker Proof)
- Brokers Involved
  - Most significant restrictions – Robinhood, IKBR, Etoro
  - Actively restricted – E-Trade, Ally, Public.com, Merrill Edge, IG Broker, Trade Republic, WeBull, Stake, Trading212
  - Restricted due to Clearing firm/broker – Freetrade, M1 Finance, Tastyworks, Stash, TD Ameritrade, Revolut
  - No significant restrictions – Fidelity, Vanguard, WealthSimple, Schwab, You Invest, Capital.com, Well Fargo, Nordnet, Citibank, Most European brokers (Swissquote, Tradestation, Degiro), Most Canadian brokers (Questtrade, Qtrade, Disnat, BMO, HSBC, RBC, TD)
- IG Broker <https://www.bbc.com/news/business-55871381>
- Etoro [https://www.etoro.com/posts/0\\_entry\\_9782fbfd-c7a7-4efb-a3b7-0c7e4532a9ad](https://www.etoro.com/posts/0_entry_9782fbfd-c7a7-4efb-a3b7-0c7e4532a9ad)



- House of Representative GameStop Report regarding events of Jan-Feb 2021  
<https://democrats-financialservices.house.gov/news/documentsingle.aspx?DocumentID=409578#:~:text=%E2%80%9CThe%20GameStop%20report%20is%20the,the%20current%20market%20regulatory%20structure.>  
[https://democrats-financialservices.house.gov/uploadedfiles/6.22\\_hfsc\\_gs.report\\_hmsmeetbp.irm.nlrf.pdf](https://democrats-financialservices.house.gov/uploadedfiles/6.22_hfsc_gs.report_hmsmeetbp.irm.nlrf.pdf)
- SEC GameStop Report <https://www.sec.gov/files/staff-report-equity-options-market-struction-conditions-early-2021.pdf>
- Robinhood (Broker) staff were aware that forcing PCO would trigger crash in stock price (House Rep Report pg. 32)



### SELF REGULATED AGENCIES (SRO) – FINRA / DTCC (DTC/NSSC/OCC) / EXCHANGES (NASDAQ/NYSE) ETC / FEDERAL RESERVE (NOT GOVERNMENT AGENCIES – PRIVATE ORGANISATIONS)

- The US Financial market is predominantly regulated by Self regulatory organisations (i.e. organisations comprised of market participants, aimed to regulate themselves) – FINRA / DTCC / ISDA / Exchanges themselves – Overseen by SEC (Civil enforcement) & DOJ (Criminal enforcement)
- Enormous conflicts of interest – FINRA + DTCC etc board comprised of current employees of major banks/companies that it regulates
  - FINRA Board - <https://www.finra.org/about/governance/finra-board-governors> (Note - majority board members are actively board members/executives at other banks/investment firms/companies, despite separation of industry & public governors – not representative of actual public)

- Current CEO of Vanguard - <https://www.finra.org/about/governance/finra-board-governors/mortimer-buckley>
- Pershing previous CEO & Current global head - <https://www.finra.org/about/governance/finra-board-governors/james-crowley>
- UBS America President <https://www.finra.org/about/governance/finra-board-governors/naureen-hassan>
- DTCC Board - <https://www.dtcc.com/about/leadership/board> (Note – actively employed in major bank / investment firms, one even at FINRA)
  - Apex FinTech CEO (Owns Apex clearing & forced PCO on GME Jan 2021) <https://www.dtcc.com/about/leadership/board/william-capuzzi>
  - Citadel Securities Global Head of Operations (Designated Market Maker & direct wholesaler for Robinhood Jan 2021) <https://www.dtcc.com/about/leadership/board/david-inggs>
  - Virtu Vice Chairman (2<sup>nd</sup> largest MM) - <https://www.dtcc.com/about/leadership/board/craig-messinger>
  - JP-Morgan Chase Managing Director - <https://www.dtcc.com/about/leadership/board/kieran-hanrahan>
  - Morgan Stanley Managing Director & Global Head of Banking Operations - <https://www.dtcc.com/about/leadership/board/william-hirshorn>
  - NYSE General Counsel <https://www.dtcc.com/about/leadership/board/hope-jarkowski>
  - Ex BNY Mellon CEO - <https://www.dtcc.com/about/leadership/board/frank-la-salla>
  - Goldman Sachs Global Head - <https://www.dtcc.com/about/leadership/board/raj-mahajan>
  - COO BNY Mellon - <https://www.dtcc.com/about/leadership/board/andrea-pfenning>
  - Bank of America Head of Operations - <https://www.dtcc.com/about/leadership/board/douglas-spell>
  - FINRA Vice President/Chief of Staff <https://www.dtcc.com/about/leadership/board/nathaniel-stankard>
- SRO are incentivised to soften regulations of market participants (it's customers & future/ex employers)
  - FINRA/DTCC are comprised of market participants as members
  - Exchanges predominant income is from charging market participants it regulates fees for transactions & data feeds/floor space etc
- FINRA along with SEC
- Many of these SRO's involved/founded with Bernie Madoff - founding member of DTCC, Chairman of NSCC, Chairman of ISCC, Chairman of NASD (Before becoming FINRA), Chairman of NASDAQ

[https://en.wikipedia.org/wiki/Bernie\\_Madoff#government\\_access](https://en.wikipedia.org/wiki/Bernie_Madoff#government_access)

Guess who was also a founding member of DTCC? Bernie Madoff's Madoff: Cronies

Some other items from his CV:

- Founding member of DTCC
- Chairman of NASDAQ
- Chairman of NSCC
- Chairman of ISCC
- Chairman of NASD ("FINRA before it was FINRA"...)
- Chairman of SIA Trading Committee
- Chairman of National Business Conduct Committee
- Member of the SIA Federal Regulation Committee
- Chairman of NASD Small Order Execution Committee

Great scene from Wizard of Lies highlighting this:

More confirmation of these in Bernie Madoff Netflix documentary – 'Madoff: Monster of Wallstreet' <https://www.netflix.com/us/title/81466159>



- Investopedia SRO Definition <https://www.investopedia.com/terms/s/sro.asp>
- SEC List of all SRO's - <https://www.sec.gov/rules/sro>
- Summary of SRO's & History in the market by Redditor & Perverse incentives creating complex markets (D. Lauer)  
[https://www.reddit.com/r/Superstonk/comments/qwtmhd/self\\_regulation\\_complexity\\_and\\_market\\_structure/](https://www.reddit.com/r/Superstonk/comments/qwtmhd/self_regulation_complexity_and_market_structure/)

### FINRA ARBITRATION FOR ALL BROKER CONTRACTS IN CASE OF CUSTOMER DISPUTE

- Arbitration is an out of court private proceeding aimed to settle a dispute, often overseen by an arbiter. A mandatory arbitration forces both parties to agree to arbiter's decision.
- Broker-Dealer customer agreements/contracts with Retail Investors have mandatory arbitration clauses for disputes with broker & waive right to seek trial in court. The Arbiter must be a FINRA Arbiter. Concerning for fair arbitration when considering FINRA's members are recently employed or seeking employment at same broker-dealers/banks & history of significant leniency to institutions (see hundreds of minor disciplinary actions for major illegal activities without seeking admission of guilt - [https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field\\_fda\\_case\\_id\\_txt=&field\\_core\\_official\\_dt%5Bmin%5D=01%2F01%2F2000&field\\_core\\_official\\_dt%5Bmax%5D=12%2F31%2F2024&field\\_fda\\_document\\_type\\_tax=All](https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field_fda_case_id_txt=&field_core_official_dt%5Bmin%5D=01%2F01%2F2000&field_core_official_dt%5Bmax%5D=12%2F31%2F2024&field_fda_document_type_tax=All) More actions listed below & evidence in Broker Check reports)
- Senator Elizabeth Warren re: Unfair FINRA arbitration as Well Fargos directed FINRA in selection process of Arbiters -  
[https://www.warren.senate.gov/imo/media/doc/2022.02.09%20Letter%20to%20FINRA%20on%20Wells%20Fargo%20Scandal%20\(1\).pdf](https://www.warren.senate.gov/imo/media/doc/2022.02.09%20Letter%20to%20FINRA%20on%20Wells%20Fargo%20Scandal%20(1).pdf)
- Alabama Securities Commission allege FINRA Arbiter corruption <https://www.famag.com/news/alabama-sues-finra-arbitrator-in-challenge-to-broker-expungement-rules-67772.html?print>
- Fidelity (Retail Broker) – Customer agreement – “As with most brokerage accounts, the parties agree to waive their rights to sue in court, and agree to abide by the findings of an arbitration panel established in accordance with an industry self-regulatory organization.”  
[https://www.fidelity.com/bin-public/060\\_www\\_fidelity\\_com/documents/customer-service/updated-agreements/Fidelity-Account-Customer-Agreement.pdf](https://www.fidelity.com/bin-public/060_www_fidelity_com/documents/customer-service/updated-agreements/Fidelity-Account-Customer-Agreement.pdf)



- TD Ameritrade – Customer agreement – Arbitration clause -  
[https://www.tdameritrade.com/retail-en\\_us/resources/pdf/TDA6189.pdf](https://www.tdameritrade.com/retail-en_us/resources/pdf/TDA6189.pdf)

18. **Dispute Arbitration Clause.** Client and TDAM agree that all controversies that may arise shall be determined by arbitration in accordance with the terms of the TD Ameritrade Client Agreement entered into with TD Ameritrade to establish the TDAIA Account. This does not constitute a waiver of any rights you may have under federal securities laws, including the right to choose the forum in which to seek resolution of disputes.

Any notice given in connection with this Agreement (other than the reports specified above) will be deemed delivered if personally delivered or sent by U.S. mail, certified or registered, or overnight courier, postage prepaid with return receipt requested, and if addressed to us to the attention of TD Ameritrade Investment Management, LLC, 200 South 108th Avenue, Omaha, NE 68164-2631 (or to another address specified by us in writing), and if to you at the address specified on your Account Application (or to another address specified by you in writing). This Agreement will be governed by the internal laws of the State of Nebraska, but nothing in this Agreement will be construed contrary to the Advisers Act or any rule or order of the Securities and Exchange Commission under the Advisers Act or the provisions of either the Internal Revenue Code of 1936, or the Employee Retirement Income Security Act of 1974, as amended (ERISA). The Account Application will not be effective until we accept it in our offices. This Account Application may be executed in counterparts, each of which will be deemed an original.

- Arbitration definition Investopedia – Overseen by FINRA  
<https://www.investopedia.com/terms/a/arbitration.asp>
- Binding/Mandatory Arbitration <https://www.investopedia.com/terms/m/mandatory-binding-arbitration.asp>

### REGULATORY CAPTURE OF REGULATORY AGENCIES – CFTC / SEC / FED– OFTEN VIA OFFERING LUCRATIVE JOBS WHEN THEY LEAVE (I.E. SEVERAL EX-SEC COMMISSIONERS HIRED BY HEDGEFUNDS)

- Dr Trimboth Interview - <https://www.youtube.com/watch?v=Reu4EcloQeQ>
- Jon Stewart Interview with Ex-SEC Commissioner Rob Jackson  
[https://www.youtube.com/watch?v=Eyo0u4\\_sYI](https://www.youtube.com/watch?v=Eyo0u4_sYI)
- Lucy Komisar (Journalist) on Regulatory Capture  
<https://www.youtube.com/watch?v=HVDVvj3GL8E>
- CFTC ceases swap reporting for several years (see CFTC misconduct for evidence)
- SEC Commissioners Hester Peirce & Mark Uyeda suspiciously votes no & argues against any retail orientated rule proposals & market reforms
  - 14/2/22 SEC Open meeting pt 1 <https://www.youtube.com/watch?v=s9gdfxColq4>
  - 14/2/22 SEC Open meeting pt 2 <https://www.youtube.com/watch?v=N0stDLkwBFO>
  - All webcasts <https://www.sec.gov/news/sec-webcasts>
- SEC loses retail investors comments (see SEC misconduct for evidence)
- SEC Chair Jay Clayton joins Apollo Global Management Inc as Lead Independent Director 2 weeks after GME Jan 2021 event <https://www.apollo.com/insights-news/pressreleases/2021/02/apollo-appoints-jay-clayton-as-lead-independent-director-113016273>
- FED Chair Ben Bernanke joins Citadel as Senior advisor (FED Chair in 2008 GFC!)  
<https://www.citadel.com/news-and-insights/dr-ben-bernanke-serve-senior-advisor-citadel/>
- FED Whistleblower Carmen Segarra – FED Bank examiner who was actively ostracised by FED seniors & later terminated for reporting blatant Conflicts of interest & softening regulations for major banks they regulated (Goldman Sachs), secret audio recordings taken of wrongdoing, her wrongful termination suit dismissed by Judge whose partner represented Goldman Sachs  
<https://www.vox.com/2014/9/26/6849287/federal-reserve-fed-goldman-sachs-this-american-life-carmen-segarra> / <https://www.propublica.org/article/carmen-segarras-secret-recordings-from-inside-new-york-fed> / <https://www.thisamericanlife.org/536/the-secret-recordings-of-carmen-segarra>
- Bernie Madoff founding member of DTCC, Chairman of NSCC, Chairman of ISCC, Chairman of NASDAQ, Chairman of NASD (Before becoming FINRA), Creator of PFOF & Market making & associated Market making exemptions  
[https://en.wikipedia.org/wiki/Bernie\\_Madoff#government\\_access](https://en.wikipedia.org/wiki/Bernie_Madoff#government_access)

Guest who was also a founding member of DTCC? Bernie Madoff's Madoff, Clinton

Some other items from his CV:

- Founding member of DTCC
- Chairman of NASDAQ
- Chairman of NSCC
- Chairman of SDC
- Chairman of NASD ("FINRA before it was FINRA" ...)
- Chairman of SIA Trading Committee
- Chairman of National Business Conduct Committee
- Member of the SIA Federal Regulation Committee
- Chairman of NASD Small Order Execution Committee

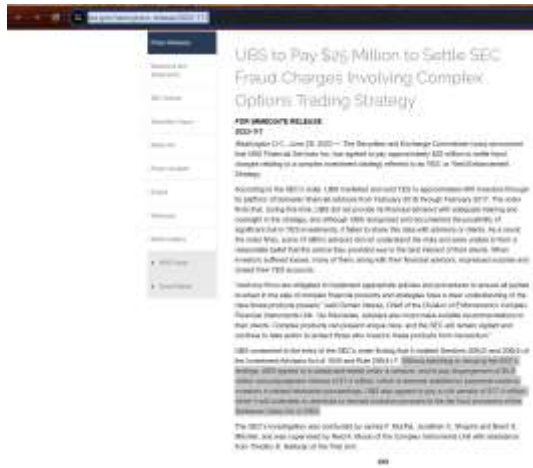
Great score from Wizard of Lies highlighting this:

More confirmation of these in Bernie Madoff Netflix documentary – ‘Madoff: Monster of Wallstreet’ <https://www.netflix.com/us/title/81466159>

- SEC ‘incompetence’ with Madoff identified in Congressional Hearing <https://www.c-span.org/video/?288828-1/securities-exchange-commission-madoff-ponzi-scheme> / Rep Ackerman section [https://www.youtube.com/watch?v=FOKSkaQoF\\_I](https://www.youtube.com/watch?v=FOKSkaQoF_I)  
SEC ‘ignored’ multiple efforts of Harry Markopolos showing evidence of Madoff’s Ponzi scheme over 9 years, sent junior SEC staff to investigate one of Wall street’s largest firms & taken Madoff’s statements at face value, failed to investigate until after Madoff’s sons forced a confession by Bernie Madoff of his crimes (i.e. unaware of \$50 billion dollar Ponzi scheme by largest & most famous Wallstreet individual that they are meant to regulate)  
[https://www.youtube.com/watch?v=uw\\_Tgu0txS0](https://www.youtube.com/watch?v=uw_Tgu0txS0)

**REGULATORY AGENCIES LEGITIMISES CRIMINAL BEHAVIOUR WITH DELAYED ACTION & WHEN CHARGED, SETTLEMENT WITH NO ADMISSION OF GUILT FROM INVOLVED PARTIES, MINISCULE FINES PROPORTIONATE TO THE CRIME & NO SIGNIFICANT PUNISHMENT OF BEHAVIOUR (FINRA + SEC)**

- FINRA Disciplinary Actions Site – HUNDREDS of charges relating to naked short selling & FTDs, HUNDREDS of waivers of consent (i.e. Charged parties do not admit guilt to any of the charges!!!!) [https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field\\_fda\\_case\\_id\\_txt=&field\\_core\\_official\\_dt%5Bmin%5D=01%2F01%2F2000&field\\_core\\_official\\_dt%5Bmax%5D=12%2F31%2F2024&field\\_fda\\_document\\_type\\_tax=All](https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field_fda_case_id_txt=&field_core_official_dt%5Bmin%5D=01%2F01%2F2000&field_core_official_dt%5Bmax%5D=12%2F31%2F2024&field_fda_document_type_tax=All) + [https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field\\_fda\\_case\\_id\\_txt=&field\\_core\\_official\\_dt%5Bmin%5D=01/01/2000&field\\_core\\_official\\_dt%5Bmax%5D=12/31/2024&field\\_fda\\_document\\_type\\_tax=All&page=1](https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field_fda_case_id_txt=&field_core_official_dt%5Bmin%5D=01/01/2000&field_core_official_dt%5Bmax%5D=12/31/2024&field_fda_document_type_tax=All&page=1) + [https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field\\_fda\\_case\\_id\\_txt=&field\\_core\\_official\\_dt%5Bmin%5D=01/01/2000&field\\_core\\_official\\_dt%5Bmax%5D=12/31/2024&field\\_fda\\_document\\_type\\_tax=All&page=2](https://www.finra.org/rules-guidance/oversight-enforcement/finra-disciplinary-actions?search=naked&firms=&individuals=&field_fda_case_id_txt=&field_core_official_dt%5Bmin%5D=01/01/2000&field_core_official_dt%5Bmax%5D=12/31/2024&field_fda_document_type_tax=All&page=2)
- Wedbush SEC Press release - \$1.2million for settlement of charges <https://www.sec.gov/news/press-release/2021-261>
- UBS SEC Press release - \$25million for settlement of Complex Options Trading Scheme, Without admission of guilt & a censure <https://www.sec.gov/news/press-release/2022-117>



- UBS Securities in 2022 Charged by FINRA with abusively utilising open fails/FTD to naked short over 9 YEARS (2009-2018) – Allowed to consent without admission of guilt, Fined \$2.5million, received 'censure' & requires to write guidelines within 90days - [https://www.finra.org/sites/default/files/fda\\_documents/2016050211701%20UBS%20Securities%20LLC%20CRD%207654%20AWC%20Final%20geg%20%282022-1667434816509%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2016050211701%20UBS%20Securities%20LLC%20CRD%207654%20AWC%20Final%20geg%20%282022-1667434816509%29.pdf)



- Goldman Sachs 2023 FINRA – 60million short sales mismarked as long (over 14billion shares) from 2015-2018 – no admission of guilt, \$3million fine & censure [https://www.finra.org/sites/default/files/fda\\_documents/2018059146501%20Goldman%20Sachs%20%26%20Co.%20LLC%20CRD%20361%20AWC%20lp%20%282023-1683246001785%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2018059146501%20Goldman%20Sachs%20%26%20Co.%20LLC%20CRD%20361%20AWC%20lp%20%282023-1683246001785%29.pdf)

#### OVERVIEW

From October 2015 to April 2018, Goldman mismarked as “long” approximately 60 million short sale orders totaling more than 14 billion shares. Nearly eight million of those orders, totaling more than a billion shares, were executed. Due to the inaccurate “long” mark, 12,335 of the executed orders were executed at or below the national best bid while a short sale circuit breaker was in effect. These mismarked orders also caused the firm to submit inaccurate trade reports to FINRA and maintain inaccurate books and records. As a result, Goldman violated Rules 200(g) of Regulation SHO, Section 17(a) of the Securities Exchange Act of 1934 and Exchange Act Rule 17a-3, and FINRA Rules 4511, 6182, 6624, and 2010.

<sup>1</sup> For more information about the firm, including prior regulatory events, visit BrokerCheck® at [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

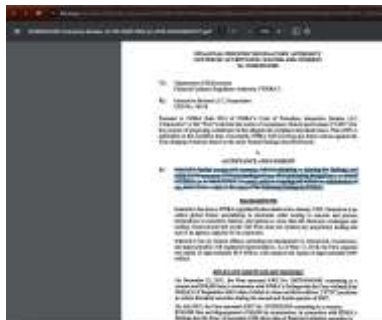
- Wedbush Securities Charged by FINRA 2022 for abusing FTD over 4 years – no admission of guilt, \$900,000 fine, censure & a written guideline within 90days (Note was previously charged for similar abuse just 5 years earlier) [https://www.finra.org/sites/default/files/fda\\_documents/2019061872201%20Wedbush%20Securities%2C%20Inc.%20CRD%20877%20AWC%20lp%20%282022-1666916413754%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2019061872201%20Wedbush%20Securities%2C%20Inc.%20CRD%20877%20AWC%20lp%20%282022-1666916413754%29.pdf)



- Citigroup in 2020 Charged by FINRA with naked short selling (>38,000 Short sells) – no admission of guilt, fined \$225,000 & required to write guideline in 30days  
[https://www.finra.org/sites/default/files/fda\\_documents/2015045325201%20Citigroup%20Global%20Markets%20Inc.%20CRD%207059%20%20AWC%20va%20%282020-1581639568074%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2015045325201%20Citigroup%20Global%20Markets%20Inc.%20CRD%207059%20%20AWC%20va%20%282020-1581639568074%29.pdf)



- IKBR 2019 Charged with Naked short selling – No admission of guilt, \$5.5mil fine, a 'censure' & guidelines  
[https://www.finra.org/sites/default/files/fda\\_documents/2014043143401%20Interactive%20Brokers%20LLC%20BD%2036418%20AWC%20jm%20%282019-1563436162277%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2014043143401%20Interactive%20Brokers%20LLC%20BD%2036418%20AWC%20jm%20%282019-1563436162277%29.pdf)



- Whistleblower (David Dayen) exposed Knight Capital misuse of Market Maker status to abusively naked short 'penny' stocks, identified >3000 events of abusive naked short selling over 4 years –charged by FINRA & fined \$105,000 (Yes that's it, required to write a guideline within 60days compliant with RegSHO & a 'censure', no SEC action  
<https://theintercept.com/2016/12/15/whistleblower-vindicated-massive-trading-firm-knight-capital-charged-with-abusing-naked-shorts/>

### BUY WRITES / MARRIED CALLS UTILISED AS 'RESET TRANSACTIONS'

- Call option – right to buy 100 shares at strike price by a set expiration date
- Put option – right to sell 100 shares at strike price by a set expiration date
- Can either buy / sell calls & puts.
  - If buy call -> bullish (looking to buy 100shares), If sell call -> bearish (looking to sell 100shares)

- If buy put -> bearish (looking to sell 100share), If sell call -> bullish (looking to keep 100shares)
  - To hedge - can either buy(long) / sell (short) the underlying stock – i.e. if looking to buy 100 shares via options, hedge by shorting up to 100 real shares and vice versa.
- Married Puts – Creates a put without underlying shares -> Purchases 100 shares as hedge/fill the FTD -> Once FTD requirement filled, ‘hedged’ shares are sold leaving behind a put, creating a synthetic short position (100 shares were bought & sold, whilst put remains & is created without an underlying stock)
- Buy-Write – Creation of Deep ITM (In the money) Calls (i.e. strike price is well below current share price – i.e. GME trading \$200/sh, strike price = \$0.50, thus almost guaranteed to be able to fill call) sold whilst purchasing 100 shares. The party selling the shares & buying the Deep ITM Call immediately exercises to receive the 100 shares back. If one party is a Market Maker with FTD exemptions from RegSHO, the other party can perform this false exchange of 100 shares to close out their FTD position & shift the FTD close out to the MM. They may also do this while at the same time buying Calls/Selling Puts that are At-The-Money to generate a synthetic long position
  - Group A buys 100 shares & sells a Deep ITM call to Group B. Group B exercises Deep ITM call to regain 100 Shares.
- Redditor summary re: options & buy write/married calls - [https://www.reddit.com/r/Superstonk/comments/nt8qzj/rip\\_uleavemeanon\\_where\\_are\\_the\\_shares\\_part\\_2/](https://www.reddit.com/r/Superstonk/comments/nt8qzj/rip_uleavemeanon_where_are_the_shares_part_2/)
- Another Redditor summary re Buy write & unusual options activity in GME [https://www.reddit.com/r/GME/comments/mk3gcd/call\\_mamaybe\\_why\\_the\\_massive\\_volume\\_of\\_deep\\_itm/](https://www.reddit.com/r/GME/comments/mk3gcd/call_mamaybe_why_the_massive_volume_of_deep_itm/)
- Redditor discussing DOOMPS (evid of significant options activity in GME Deep in the money [https://www.reddit.com/r/Superstonk/comments/ptvrhb/about\\_all\\_those\\_deep\\_otm\\_gme\\_put\\_s/](https://www.reddit.com/r/Superstonk/comments/ptvrhb/about_all_those_deep_otm_gme_put_s/))
- Another summary with evidence of suspicious ITM Options & increased Dark pool activity [https://www.reddit.com/r/Superstonk/comments/mvdgf5/the\\_naked\\_shorting\\_scam\\_in\\_numbers\\_ai\\_detection/](https://www.reddit.com/r/Superstonk/comments/mvdgf5/the_naked_shorting_scam_in_numbers_ai_detection/)
- Another summary discussing Married puts etc [https://www.reddit.com/r/GME/comments/mgj0j1/the\\_naked\\_shorting\\_scam\\_revealed\\_lending\\_of/](https://www.reddit.com/r/GME/comments/mgj0j1/the_naked_shorting_scam_revealed_lending_of/)
- Another theory re above [https://web.archive.org/web/20210719074624/https://www.reddit.com/r/Superstonk/comments/on9dtz/otm\\_puts\\_are\\_the\\_passed\\_puck\\_of\\_short\\_positions/](https://web.archive.org/web/20210719074624/https://www.reddit.com/r/Superstonk/comments/on9dtz/otm_puts_are_the_passed_puck_of_short_positions/)
- Post with screenshots of Options prior to expiry [https://www.reddit.com/r/Superstonk/comments/um3l1a/hey\\_everybody\\_you\\_remember\\_these\\_deep\\_otm\\_gme/](https://www.reddit.com/r/Superstonk/comments/um3l1a/hey_everybody_you_remember_these_deep_otm_gme/)

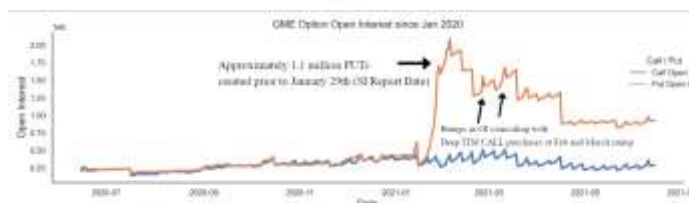
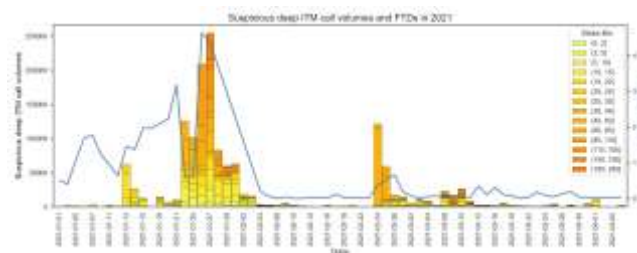
The image contains two screenshots of a financial data website, likely Yahoo Finance, showing options activity for GABESTOP CORP NEW CL. The left screenshot shows the 'CALLS' and 'PUTS' tabs, with a table of open interest. The right screenshot shows a similar table with a red box highlighting specific data points.

Strike	Open Interest	Volume	Net Change	Last	Bid	Ask	Last Change	Volume	Open Interest	Volume	Net Change	Volume	Open Interest	Volume	Net Change	Volume	Open Interest
0.50	100	100	0	0.50	0.50	0.50	0.00	100	100	100	0	100	100	100	0	100	100
1.00	200	200	0	1.00	1.00	1.00	0.00	200	200	200	0	200	200	200	0	200	200
1.50	300	300	0	1.50	1.50	1.50	0.00	300	300	300	0	300	300	300	0	300	300
2.00	400	400	0	2.00	2.00	2.00	0.00	400	400	400	0	400	400	400	0	400	400
2.50	500	500	0	2.50	2.50	2.50	0.00	500	500	500	0	500	500	500	0	500	500
3.00	600	600	0	3.00	3.00	3.00	0.00	600	600	600	0	600	600	600	0	600	600
3.50	700	700	0	3.50	3.50	3.50	0.00	700	700	700	0	700	700	700	0	700	700
4.00	800	800	0	4.00	4.00	4.00	0.00	800	800	800	0	800	800	800	0	800	800
4.50	900	900	0	4.50	4.50	4.50	0.00	900	900	900	0	900	900	900	0	900	900
5.00	1000	1000	0	5.00	5.00	5.00	0.00	1000	1000	1000	0	1000	1000	1000	0	1000	1000

- SEC Alert detailing mechanism to avoid short sale regulation (PDF provides clearest explanation) <https://www.sec.gov/news/press-release/2013-151> + <https://www.sec.gov/about/offices/ocie/options-trading-risk-alert.pdf>
- Citadel Largest Options Market Maker <https://www.citadelsecurities.com/what-we-do/options/>

### DEEP OUT OF MONEY PUTS (DOOMPS)

- Put option – right to sell 100 shares at strike price by a set expiration date
- Deep Out of Money Put – A put option where the share price is well above the set strike price (i.e. GME share price \$220, Put strike Price \$0.50 – put will only be valid if price of shares plummet by expiration date)
- A significant amount of DOOMPS opened during Jan 2021 event with strike prices below \$1. Quantity of shares valued in these DOOMPS at <\$1 strike price exceeded the total shares outstanding of GameStop (69.5mil)
- An unusually large amount of ITM (In the money Calls) created in same time period & exercised, suspected that DOOMPS remnant hedge of ITM Call creation on Jan 2021 to transfer & fulfill FTDs from short/low funded hedgefunds -> Market Makers (evidenced by Citadel & Point72 sudden \$2.75billion cash injection to Melvin Capital on Jan 2021)
  - i.e.. Market makers / broker dealer utilising Bona fide market making privileges create Deep ITM Calls without underlying shares
    - -> Short hedgefunds purchase ITM Calls & exercise gaining access to shares on books & filling FTD positions
    - -> MM/Bona fide MM now short due to exercising of calls, however due to MM exemptions allowed to naked short position & extend buy in period
    - -> MMs & initial short hedgefunds create Total Equity Return Swap on desired position (not required to be reported) allowing short hedgefunds to gain synthetic short position
    - -> MM create DOOMPS to hedge total equity return swap
  - Redditor analysis Suspicious ITM call activity in Jan 2021 (140million shares worth of calls exercised between Jan 1 to 25<sup>th</sup> – GME total float is only 69.5million at this time) [https://www.reddit.com/r/Superstonk/comments/mvdgf5/the\\_naked\\_shorting\\_scam\\_in\\_numbers\\_ai\\_detection/](https://www.reddit.com/r/Superstonk/comments/mvdgf5/the_naked_shorting_scam_in_numbers_ai_detection/)



- Redditor analysis of Melvin & suspected transfer of FTDs via ITM Calls [https://web.archive.org/web/20210726041401/https://www.reddit.com/r/DDintoGME/comments/orr6ht/speculative\\_piecing\\_together\\_the\\_itm\\_calls\\_and/](https://web.archive.org/web/20210726041401/https://www.reddit.com/r/DDintoGME/comments/orr6ht/speculative_piecing_together_the_itm_calls_and/)

- Note Melvin Capital suffered heavy losses due to shorting GameStop & later shutdown in 2022. Claims to have closed short position on 27 Jan 2021 – 2 days post cash injection from Citadel & in same timeline as creation & exercise of ITM Calls
  - Melvin capital injection by Citadel & Point72 <https://www.wsj.com/articles/citadel-point72-to-invest-2-75-billion-into-melvin-capital-management-11611604340> )
  - Melvin supposedly closed short position 27/1/21 & ‘Repositioned portfolio’ <https://www.reuters.com/article/us-gamestop-melvin/hedge-fund-melvin-capital-has-closed-gamestop-position-spokesman-idUSKBN29X0EN/> + <https://www.youtube.com/watch?v=1HYBo5teFTU> + <https://www.marketwatch.com/story/hedge-fund-melvin-capital-closes-out-gamestop-short-cnbc-2021-01-27> + <https://www.cnn.com/2021/01/27/hedge-fund-targeted-by-reddit-board-melvin-capital-closed-out-of-gamestop-short-position-tuesday.html>
  - Ads on Reddit for Melvin Close 27/1/21 [https://www.reddit.com/r/Superstonk/comments/mnqq8z/remember\\_cnbc\\_ran\\_ads\\_claiming\\_melvin\\_had\\_closed/](https://www.reddit.com/r/Superstonk/comments/mnqq8z/remember_cnbc_ran_ads_claiming_melvin_had_closed/)
  - Melvin loss >\$6billion <https://markets.businessinsider.com/news/stocks/melvin-capital-closes-out-public-short-positions-after-gamestop-losses-2021-5-1030447490> + <https://www.wsj.com/articles/melvin-plotkin-gamestop-losses-memestock-11643381321>
  - Ken Griffin Citadel Founder justifies Melvin Purchase 25/1/21 <https://www.cnn.com/2021/02/19/citadel-billionaire-ken-griffin-defends-melvin-stake-against-what-he-calls-an-insane-conspiracy-theory.html> + Transcript of Interview <https://www.cnn.com/2021/02/19/cnbc-exclusive-cnbc-transcript-citadel-founder-ceo-ken-griffin-speaks-with-cnbc-squawk-box-today.html>
  - Melvin Capital winds down May 2022 <https://www.bloomberg.com/news/articles/2022-05-18/gabe-plotkin-s-melvin-capital-to-wind-down-funds-after-losses?ref=rWJsGwt> + Summary of events <https://www.nytimes.com/2022/05/18/business/melvin-capital-gamestop-short.html>
- Highest Put holders in 2021 include Citadel Advisors, Susquehanna, Jane Street, Wolverine (Forced PCO w brokers & Robinhoods other wholesaler), UBS, Nomura (Largest default on Jan 27/28, with largest excess waived by DTCC - \$50Billion! – House representatives report, Note 2<sup>nd</sup> largest excess waived Robinhood at \$2Bill signif smaller)

Issuer	Put	Volume	Market Value	% of Portfolio	Price % of Portfolio	Ranking	Price Movement	Change in Volume	Account Type	Account Size	Buy/Sell	2021 Start/End
Investment Management Group, Inc.	Put	4,000,000	2,300,000,000	1.1%	0.00%	139	0.00	0.00	Put	4,000,000	Buy	01/01/21 - 12/31/21
Wolverine Trading, Inc.	Put	4,000,000	2,300,000,000	0.00%	0.00%	0	0.00	41,120,000	Put	4,000,000	Buy	01/01/21 - 04/01/21
Global Advisors	Put	3,750,000	2,100,000,000	1.13%	0.01%	36	0.00	10,000,000	Put	3,750,000	Buy	01/01/21 - 12/31/21
Jane Street Group, Inc.	Put	3,500,000	2,000,000,000	1.13%	0.01%	27	0.00	20,000,000	Put	3,500,000	Buy	01/01/21 - 12/31/21
George Soros Trading Ltd.	Put	3,000,000	1,600,000,000	0.78%	0.01%	38	0.00	10,000,000	Put	3,000,000	Buy	01/01/21 - 12/31/21
Highbridge Fund LP	Put	2,000,000	1,100,000,000	0.52%	0.01%	5	0.00	20,000,000	Put	2,000,000	Buy	01/01/21 - 12/31/21
M&P Group, Inc.	Put	1,500,000	800,000,000	0.38%	0.01%	37	0.00	10,000,000	Put	1,500,000	Buy	01/01/21 - 12/31/21
Motors & Trading, Inc.	Put	1,000,000	500,000,000	0.23%	0.01%	22	0.00	27,000,000	Put	1,000,000	Buy	01/01/21 - 12/31/21
Motors & Management, Inc.	Put	770,000	400,000,000	0.19%	0.01%	4	0.00	10,000,000	Put	770,000	Buy	01/01/21 - 12/31/21
Highbridge, Inc.	Put	600,000	300,000,000	0.14%	0.01%	101	0.00	10,000,000	Put	600,000	Buy	01/01/21 - 12/31/21
UBS Group AG	Put	672,000	340,000,000	0.16%	0.01%	24	0.00	10,000,000	Put	672,000	Buy	01/01/21 - 12/31/21
Moneta Holdings, Inc.	Put	400,000	200,000,000	0.10%	0.00%	94	0.00	10,000,000	Put	400,000	Buy	01/01/21 - 12/31/21
Moneta Holdings Asset Management, Inc.	Put	370,000	180,000,000	0.08%	0.00%	476	0.00	10,000,000	Put	370,000	Buy	01/01/21 - 12/31/21
Sevens Capital Advisors, Inc.	Put	300,000	150,000,000	0.07%	0.00%	8	0.00	10,000,000	Put	300,000	Buy	01/01/21 - 12/31/21
Global Partners, Inc.	Put	270,000	130,000,000	0.06%	0.01%	21	0.00	10,000,000	Put	270,000	Buy	01/01/21 - 12/31/21
U.S. Trust Bank, N.A.	Put	220,000	110,000,000	0.05%	0.00%	102	0.00	10,000,000	Put	220,000	Buy	01/01/21 - 12/31/21
International Investment, Inc.	Put	180,000	90,000,000	0.04%	0.00%	172	0.00	10,000,000	Put	180,000	Buy	01/01/21 - 12/31/21
International Bank & Finance, Inc.	Put	170,000	80,000,000	0.04%	0.00%	96	0.00	10,000,000	Put	170,000	Buy	01/01/21 - 12/31/21
M&P Capital Management, Inc.	Put	160,000	80,000,000	0.04%	0.00%	36	0.00	10,000,000	Put	160,000	Buy	01/01/21 - 12/31/21
Wolverine Trading, Inc.	Put	150,000	70,000,000	0.03%	0.01%	222	0.00	10,000,000	Put	150,000	Buy	01/01/21 - 12/31/21
Highbridge Advisors, Inc.	Put	140,000	70,000,000	0.03%	0.00%	388	0.00	10,000,000	Put	140,000	Buy	01/01/21 - 12/31/21
Collin Advisors	Put	130,000	60,000,000	0.03%	0.01%	167	0.00	10,000,000	Put	130,000	Buy	01/01/21 - 12/31/21
Archetype Capital Partners, L.P.	Put	100,000	50,000,000	0.02%	0.00%	24	0.00	10,000,000	Put	100,000	Buy	01/01/21 - 12/31/21
Moneta, Inc.	Put	90,000	40,000,000	0.02%	0.00%	102	0.00	10,000,000	Put	90,000	Buy	01/01/21 - 12/31/21
Highbridge, Inc.	Put	80,000	35,000,000	0.02%	0.01%	99	0.00	10,000,000	Put	80,000	Buy	01/01/21 - 12/31/21
Global Advisors, Inc.	Put	80,000	35,000,000	0.02%	0.00%	207	0.00	10,000,000	Put	80,000	Buy	01/01/21 - 12/31/21
Global Partners, Inc.	Put	80,000	35,000,000	0.02%	0.01%	179	0.00	10,000,000	Put	80,000	Buy	01/01/21 - 12/31/21
Global Capital, Inc.	Put	80,000	35,000,000	0.02%	0.01%	222	0.00	10,000,000	Put	80,000	Buy	01/01/21 - 12/31/21
Global Partners, Inc.	Put	80,000	35,000,000	0.02%	0.01%	2	0.00	10,000,000	Put	80,000	Buy	01/01/21 - 12/31/21
Moneta Capital Management, Inc.	Put	80,000	35,000,000	0.02%	0.01%	4	0.00	10,000,000	Put	80,000	Buy	01/01/21 - 12/31/21

- Reddit summary - [https://www.reddit.com/r/Superstonk/comments/ptvrhb/about\\_all\\_those\\_deep\\_otm\\_gme\\_put/](https://www.reddit.com/r/Superstonk/comments/ptvrhb/about_all_those_deep_otm_gme_put/)
- Evid of suspicious buy & immediate sell of Put options in GME [https://www.reddit.com/r/Superstonk/comments/vms14z/it\\_appears\\_someone\\_is\\_using\\_optio](https://www.reddit.com/r/Superstonk/comments/vms14z/it_appears_someone_is_using_optio)



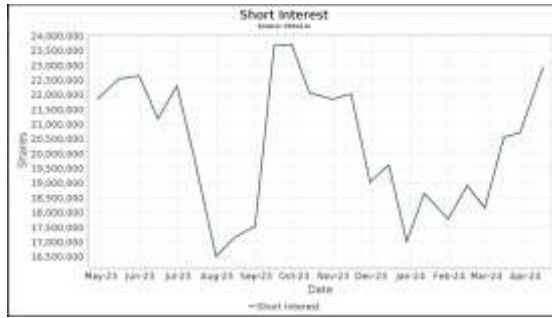
[ns\\_to\\_fulfill/](#) (?utilising Deep ITM Puts to justify Naked shorting as MM would need to short to hedge position)

- Extensive reddit summary with DOOMPS, disproportionate ITM(In-the-money) Calls created on Jan 2021, Equity Swaps  
[https://www.reddit.com/r/Superstonk/comments/pb22oj/the\\_puzzle\\_pieces\\_of\\_quarterly\\_movements\\_equity/](https://www.reddit.com/r/Superstonk/comments/pb22oj/the_puzzle_pieces_of_quarterly_movements_equity/)
- Redditor noticing unusual Calls & immediate exercise valuing over 44 million shares  
[https://www.reddit.com/r/GME/comments/mhv22h/the\\_si\\_is\\_fake\\_i\\_found\\_44000000\\_million\\_shorts/?utm\\_medium=android\\_app&utm\\_source=share](https://www.reddit.com/r/GME/comments/mhv22h/the_si_is_fake_i_found_44000000_million_shorts/?utm_medium=android_app&utm_source=share) (archived <https://archive.md/J6qpF>)
- Another Redditor on ITM calls /Buy Writes + Unusual open interest + Calculations to show synthetic longs created by options equate to reduction in SI% in Feb 2021 after SI calculations changed to include synthetic longs  
[https://www.reddit.com/r/Superstonk/comments/o7klxj/looks\\_like\\_the\\_recent\\_robinhood\\_class\\_action\\_si/](https://www.reddit.com/r/Superstonk/comments/o7klxj/looks_like_the_recent_robinhood_class_action_si/)
- Research paper including DOOMPS <https://core.ac.uk/download/pdf/39665201.pdf>
- SEC Alert detailing mechanism to avoid short sale regulation (PDF provides clearest explanation)  
<https://www.sec.gov/news/press-release/2013-151> +  
<https://www.sec.gov/about/offices/ocie/options-trading-risk-alert.pdf>
- Citadel is retail's largest Options Market Maker operating on all major exchanges  
<https://www.citadelsecurities.com/what-we-do/options/>



### ETF SHARE EQUIVALENCE / AUTHORISED PARTICIPANT

- An exchange-traded fund (ETF) is a pooled investment security that can be bought and sold like an individual stock. ETFs can be structured to track anything from the price of a commodity to a large and diverse collection of securities.  
<https://www.investopedia.com/etfs-4427784>
- ETFs can range in underlying assets such as stocks/bonds/crypto/commodities & in nature – specific industry/sector(tech/retail etc)/entire exchanges. Can be passively or actively managed by the fund manager. May be non-leveraged or leveraged (Value is derived from a multiple of the underlying). Investors in an ETF DO NOT OWN the underlying asset, rather they own a share in the fund that holds the assets <https://www.investopedia.com/terms/e/etf.asp>
- Common doctrine is ETFs offer reduced risk due to increased diversity compared to singular stocks & are managed by 'professionals'. Note that ETFs do not have a limit on number of investors (as per above) & trade constantly unlike once a day with mutual funds.
- ETFs may also be short sold & Failed to Deliver (FTD) such as XRT SDPR S&P Retail ETF based on American Retail stores with a short interest fluctuating 220-440% (Approx 7.5Mill Share outstanding, short interest 16mil-24mil) <https://fintel.io/ss/us/xrt#>

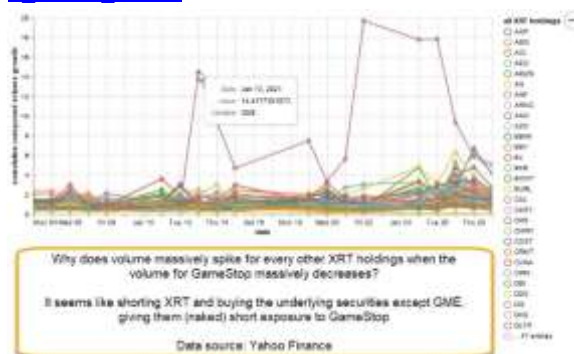


- Increasing FTDs in ETF (Evans Lecture below) – in 2016 ETFs contributed to 78% of all FTDs by Dollar Volume

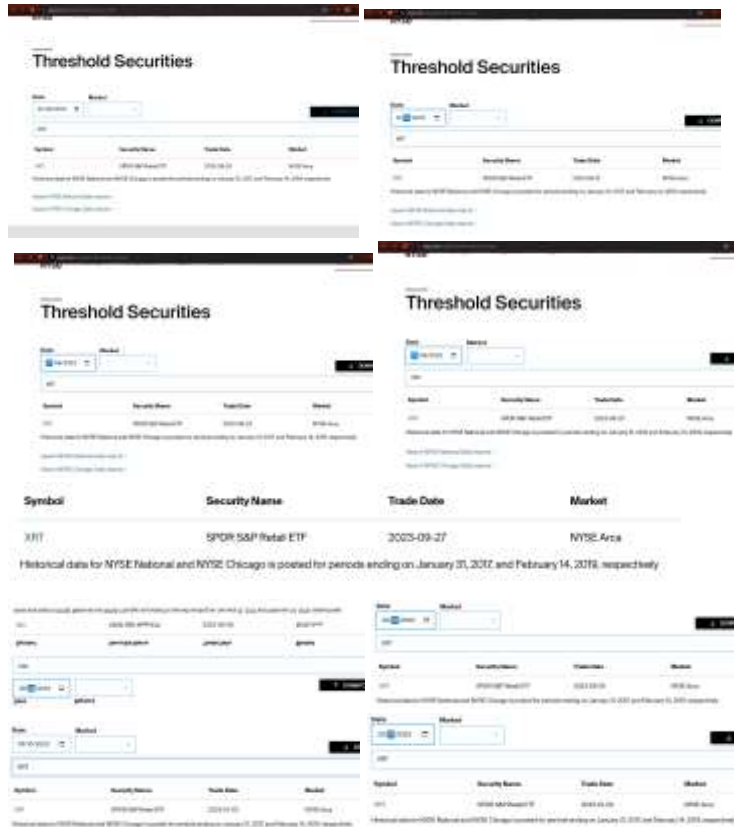


- Authorised participant (AP)– An agent permitted by ETF to provide ‘liquidity’ in the ETF by exchanging the underlying assets/ETF Creation units for cash or ‘in-kind’ securities. Authorised participants can be market makers. <https://www.investopedia.com/terms/e/etf-sponsor.asp#:~:text=Authorized%20participants%20are%20broker%2Ddealer,ETF%20to%20sell%20on%20exchanges.>
  - Authorised Participants can thus exchange cash or securities deemed to be of ‘similar value’ with the underlying assets in the ETF or for additional Creation units (shares) of the ETF (from ETF Sponsor)
  - Note this is concerning as the underlying assets in an ETF may not be what has been advised to the investors and may only recreate the ‘value’ of the claimed underlying assets in the ETF. Compounded with the ability to
- Institutional Investor (Provisioner of assets) ->Gives assets to ETF Sponsor (Creator of ETF) -> Creates ETF (Basket of assets) -> Provides Creations Units (Large blocks of Shares of ETF) to Institutional investors + Creates Shares of ETF -> Sold to AP (Authorised Participant) (Creation + Shares – Priced at Net asset Value daily NAV) -> AP buy/sells shares via Stock exchange (2ndary market) to investors
  - Note – Creation units can be redeemed for the underlying assets of ETF. Shares of ETF only provide share of fund, not directly the underlying assets.
  - AP profits by selling difference between NAV price & Stock market price. Also by exchanging the underlying assets in baskets /creation units / shares with cash/in-kind securities & vice versa.
- Richard Evans Professor at University of Virginia Darden on ETF & Failure to Deliver,: Naked shorting or Operational selling – Extensive discussion on topic and potential misuse of ETFs - <https://www.youtube.com/watch?v=ncq35zrFCag>
- SDPR XRT

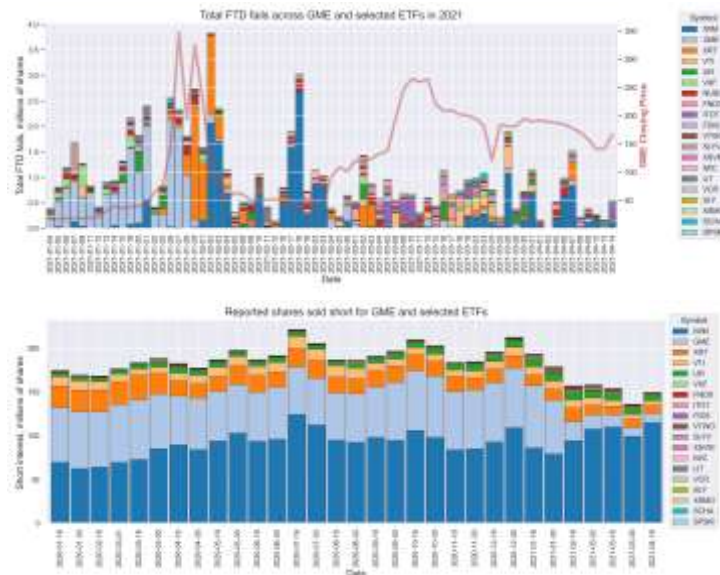
- One of the most shorted & FTD ETF – Retail/Discretionary Sector ETF – Avg 220-400% Short & frequently on Threshold list for excessive FTD
- Contains GameStop (1.114% of fund, 615,124Shares as of 1/5/24, up to 6.75% of fund at time of 2021) – Note the underlying assets can be exchanged by Aps for ETF creation units/shares or in-kind securities (i.e. GME in ETF can be exchanged out for similar ‘value’ shares, compounded by significant short interest/FTDs suggesting of existence of phantom ETF shares – allowing phantom shares to be exchanged/held in equivalence to having GME shares)
- ETF Sponsor State Street (3<sup>rd</sup> highest Institutional investor in GME – 2.6% Outstanding)
- Authorised participants include Citadel Securities, Barclay’s, Goldman Sachs, Citigroup as per State Street <https://www.wsj.com/articles/gamestop-craze-puts-holders-of-retail-etf-on-wild-ride-11613923200> (Note has been edited out, refer to archived <https://archive.md/r7kfk> )
- <https://www.ssga.com/us/en/intermediary/etfs/funds/spdr-sp-retail-etf-xrt>
- Redditor summary (3Part ETF abuse) -  
[https://www.reddit.com/r/Superstonk/comments/nt8ot8/rip\\_uleavemeanon\\_where\\_are\\_the\\_shares\\_part\\_1/](https://www.reddit.com/r/Superstonk/comments/nt8ot8/rip_uleavemeanon_where_are_the_shares_part_1/)  
[https://www.reddit.com/r/Superstonk/comments/nt8qzj/rip\\_uleavemeanon\\_where\\_are\\_the\\_shares\\_part\\_2/](https://www.reddit.com/r/Superstonk/comments/nt8qzj/rip_uleavemeanon_where_are_the_shares_part_2/)  
[https://www.reddit.com/r/Superstonk/comments/nt8t9n/rip\\_uleavemeanon\\_where\\_are\\_the\\_shares\\_part\\_3/](https://www.reddit.com/r/Superstonk/comments/nt8t9n/rip_uleavemeanon_where_are_the_shares_part_3/)
- Redditor analysis of ETF misuse via naked shorting ETF shares  
[https://www.reddit.com/r/Superstonk/comments/o1b844/shell\\_games\\_all\\_the\\_way\\_down/](https://www.reddit.com/r/Superstonk/comments/o1b844/shell_games_all_the_way_down/)
- Redditor Summary Suspicious XRT activity correlating w Jan 2021 Spike  
[https://www.reddit.com/r/GME/comments/lq0cqh/serious\\_researchers\\_needed\\_now\\_update\\_6\\_fake/](https://www.reddit.com/r/GME/comments/lq0cqh/serious_researchers_needed_now_update_6_fake/)
- Another Redditor noticing 2021 Jan XRT discrepancies – Spikes in Volume for other stocks in XRT with concurrent reduction in GME Volume  
[https://www.reddit.com/r/Superstonk/comments/17c3bpt/proof\\_of\\_shorting\\_xrt\\_to\\_gain\\_naked\\_short/](https://www.reddit.com/r/Superstonk/comments/17c3bpt/proof_of_shorting_xrt_to_gain_naked_short/)



- Redditor noticing Citadel AP  
[https://www.reddit.com/r/GME/comments/lr61hr/serious\\_researchers\\_needed\\_now\\_update\\_7\\_citadel/](https://www.reddit.com/r/GME/comments/lr61hr/serious_researchers_needed_now_update_7_citadel/)
- XRT Frequently on Threshold list (Excessively Failed to Deliver)  
<https://www.nyse.com/regulation/threshold-securities>



- Extensive reddit analysis of ETF FTDs in relation to GME (Note finds most consistent fails in IWM ETF containing GME then XRT) [https://www.reddit.com/r/Superstonk/comments/n1vgbb/the\\_naked\\_shorting\\_scam\\_using\\_etfs\\_mass\\_shifting/](https://www.reddit.com/r/Superstonk/comments/n1vgbb/the_naked_shorting_scam_using_etfs_mass_shifting/)



**SINGLE STOCK ETF**

- An ETF that derives its value on a single stock. Often the ETF price is leveraged and may be long/short the underlying asset. <https://www.nerdwallet.com/article/investing/what-are-single-stock-etfs>
- Allows ETF benefits to be applied to a single stock such as creation units/exchange capability/in-kind securities/Authorised participant access/shorting via ETF/operational shorting/arbitrage on

the NAV vs ETF stock price – i.e. provides additional methods to indirectly short, FTD & exchange cash/other securities for underlying asset

- Roundhill ETFs offer ‘memestock’ single stock ETFs (i.e. Basket stocks) – all are SHORT single stock ETFs <https://www.etf.com/MEME> + <https://www.sec.gov/Archives/edgar/data/1924868/000138713122009293/0001387131-22-009293-index.html> +
- ETF Products can be brought to market without SEC approval if certain conditions are met (as per Rule 6c-11) – instigating the new single stock ETF product.
  - SEC commissioners did not believe this was an intended exception in rule 6c-11 <https://www.sec.gov/news/statement/crenshaw-single-stock-etfs-20220711>
- Extensive Redditor analysis of Single Stock ETF & GME-Inclusive ETFs [https://www.reddit.com/r/Superstonk/comments/x1kqms/deep\\_dive\\_manipulative\\_single\\_stock\\_etfs\\_the\\_rex/](https://www.reddit.com/r/Superstonk/comments/x1kqms/deep_dive_manipulative_single_stock_etfs_the_rex/)
- REX MEME Stock initially accepted (Dec 2021) -> shutdown due to ‘lack of interest’ (Dec 2023) <https://www.reuters.com/markets/roundhill-shut-meme-etf-due-flagging-investor-interest-2023-11-28/> + [https://www.reddit.com/r/Superstonk/comments/z9cgvd/rex\\_short\\_gme\\_etf\\_implementation\\_date\\_pushed\\_out/](https://www.reddit.com/r/Superstonk/comments/z9cgvd/rex_short_gme_etf_implementation_date_pushed_out/)

## SWAPS – EQUITY / TOTAL RETURN / CREDIT DEFAULT / BULLET / VARIANCE

- An over the counter (OTC) derivative contract formed between private parties. Allows a party to have exposure to an asset/instrument without directly purchasing/selling said asset. May be used to build short exposure without actively shorting in open market & reduces visibility to other market participants & regulators. Predominantly regulated by CFTC. Note Swaps Reporting delayed for 4 years (see evidence below in CFTC Misconduct)

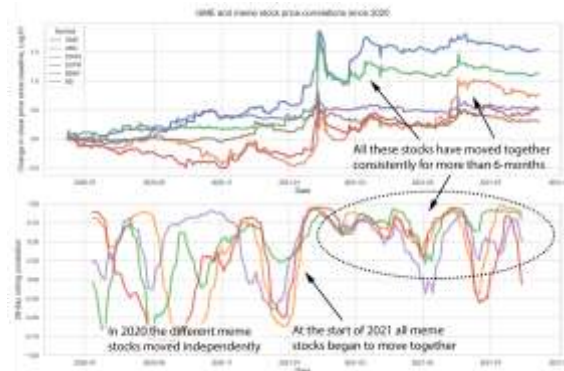


- Investopedia summary Swaps <https://www.investopedia.com/articles/optioninvestor/07/swaps.asp>
- Reddit summary of suspected SWAP activity in GME [https://www.reddit.com/r/Superstonk/comments/11xoawt/the\\_gamestopswap\\_dd/?rdt=36355](https://www.reddit.com/r/Superstonk/comments/11xoawt/the_gamestopswap_dd/?rdt=36355)
- Reddit Bullet Swap theory + Fincyclopedia [https://www.reddit.com/r/Superstonk/comments/y19q9m/the\\_truth\\_behind\\_bullet\\_swaps\\_why\\_theyre\\_reckless/](https://www.reddit.com/r/Superstonk/comments/y19q9m/the_truth_behind_bullet_swaps_why_theyre_reckless/) + <https://fincyclopedia.net/derivatives/b/bullet-swap> + [https://www.reddit.com/r/Superstonk/comments/yo9tvn/the\\_black\\_swan\\_archegos\\_bullet\\_swaps/](https://www.reddit.com/r/Superstonk/comments/yo9tvn/the_black_swan_archegos_bullet_swaps/)
- Variance Swap Discussion (Swap based on degree of Volatility in stock) [https://www.reddit.com/r/Superstonk/comments/qvtmxm/clearing\\_up\\_some\\_things\\_about\\_options\\_and\\_how\\_it/](https://www.reddit.com/r/Superstonk/comments/qvtmxm/clearing_up_some_things_about_options_and_how_it/) + Another [https://www.reddit.com/r/Superstonk/comments/qoz68k/how\\_variance\\_swaps\\_can\\_explain\\_or\\_in\\_far\\_otm\\_puts/](https://www.reddit.com/r/Superstonk/comments/qoz68k/how_variance_swaps_can_explain_or_in_far_otm_puts/) + Another [https://www.reddit.com/r/Superstonk/comments/qmtt6g/volatility\\_variance\\_dispersion\\_oh\\_my/](https://www.reddit.com/r/Superstonk/comments/qmtt6g/volatility_variance_dispersion_oh_my/) (Archived)
- Redditor discussion re: Citadel & CME (Chicago Mercantile Exchange – Major Swaps Clearinghouse)

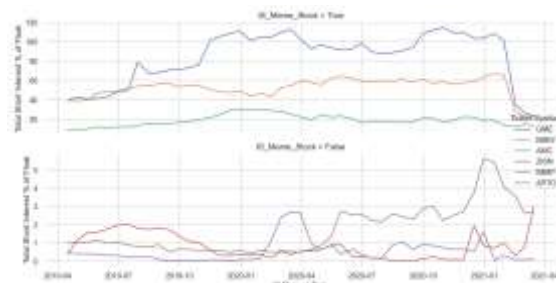
[https://www.reddit.com/r/Autisticats/comments/ojrh8x/chicago\\_mercantile\\_exchange\\_cme\\_group\\_and\\_citadel/](https://www.reddit.com/r/Autisticats/comments/ojrh8x/chicago_mercantile_exchange_cme_group_and_citadel/)

### SWAP BASKET STOCKS

- A Swap derivative contract tied to several (a basket) of stocks rather than a singular stock.
- Utilised by Archegos Capital Management (See court documents below in Archegos misconduct)
- Suspect that heavily shorted stocks involved in GME Jan 2021 events were involved in same equity basket swap (GME, AMC, Blackberry BB, Koss Corp KOSS, Bed Bath Beyond BBBY, Nokia Corp NOK)
  - As per House representative GME Report – Robinhood stopped routing following securities on Jan 2021 - ACST, AMC, ATOS, AVGR, AZRX, BB, BIOL, BNGO, BRK.A, CCIV, EXPR, GME, GRTS, GSAT, JAGX, KOSS, LLIT, NAKD, NLSP, NOK, OCGN, OXBR, SENS, SYN, ZOM
    - <https://democrats-financialservices.house.gov/news/documentsingle.aspx?DocumentID=409578#:~:text=%E2%80%9CThe%20GameStop%20report%20is%20the,the%20current%20market%20regulatory%20structure.>
    - [https://democrats-financialservices.house.gov/uploadedfiles/6.22\\_hfsc\\_gs.report\\_hmsmeetbp.irm.nlrf.pdf](https://democrats-financialservices.house.gov/uploadedfiles/6.22_hfsc_gs.report_hmsmeetbp.irm.nlrf.pdf)
- Evidenced by similar price movements between basket stocks
  - Redditor analysing Archegos / Total return swaps with various 'Basket' Stocks
    - [https://www.reddit.com/r/Superstonk/comments/pbibrk/the\\_start\\_of\\_the\\_swaps\\_packing\\_meme\\_stocks\\_up/](https://www.reddit.com/r/Superstonk/comments/pbibrk/the_start_of_the_swaps_packing_meme_stocks_up/)



- Short Interest GME, BBBY & AMC – Sudden drop in GME/BBBY on same day
  - [https://www.reddit.com/r/Superstonk/comments/mma7eh/analysis\\_deep\\_dive\\_looking\\_at\\_historical\\_si\\_ftd/](https://www.reddit.com/r/Superstonk/comments/mma7eh/analysis_deep_dive_looking_at_historical_si_ftd/)



- Another analysis showing similar correlation between GME, AMC, KOSS
  - [https://www.reddit.com/r/Superstonk/comments/o14ccz/the\\_naked\\_shorting\\_scam\\_in\\_numbers\\_part\\_deux\\_up/](https://www.reddit.com/r/Superstonk/comments/o14ccz/the_naked_shorting_scam_in_numbers_part_deux_up/)



- Twitter user/reddit discussing CFTC Court documents with Archegos Swaps Data & correlating with GME Price rise, evidence of short swap position & active use of Custom BASKET Swaps [https://www.reddit.com/r/GME/comments/15g4fbz/basket\\_swaps/](https://www.reddit.com/r/GME/comments/15g4fbz/basket_swaps/) [https://www.tiktok.com/@cancelthisclothingco/video/7262375821401197866?is\\_from\\_webapp=1&sender\\_device=mobile&sender\\_web\\_id=7262705466743916065](https://www.tiktok.com/@cancelthisclothingco/video/7262375821401197866?is_from_webapp=1&sender_device=mobile&sender_web_id=7262705466743916065)
- Redditor correlating swaps with Jan 2021 stocks [https://www.reddit.com/r/Superstonk/comments/p37osl/are\\_futures\\_or\\_swaps\\_the\\_secret\\_sauce\\_to\\_price/](https://www.reddit.com/r/Superstonk/comments/p37osl/are_futures_or_swaps_the_secret_sauce_to_price/)
- Redditor noticing identical price movement with KOSS [https://www.reddit.com/r/DDintoGME/comments/pgnbru/a\\_deep\\_dive\\_into\\_the\\_basket\\_of\\_meme\\_stock\\_swaps/](https://www.reddit.com/r/DDintoGME/comments/pgnbru/a_deep_dive_into_the_basket_of_meme_stock_swaps/)
- Redditor assessing Basket Swap & XRT ETF [https://www.reddit.com/r/Superstonk/comments/wh6d2n/follow\\_the\\_baskets\\_how\\_a\\_special\\_type\\_of\\_swap/](https://www.reddit.com/r/Superstonk/comments/wh6d2n/follow_the_baskets_how_a_special_type_of_swap/)
- The Bigger Short Theory by Criand (Incentivised CDS Index use & CMBS) [https://www.reddit.com/r/Superstonk/comments/o0scoy/the\\_bigger\\_short\\_how\\_2008\\_is\\_repeating\\_at\\_a\\_much/](https://www.reddit.com/r/Superstonk/comments/o0scoy/the_bigger_short_how_2008_is_repeating_at_a_much/) + [https://www.reddit.com/r/a:t5\\_4rncjq/comments/olutu8/the\\_bigger\\_short\\_by\\_ucriand/](https://www.reddit.com/r/a:t5_4rncjq/comments/olutu8/the_bigger_short_by_ucriand/)
- Suspicion AMC later utilised as volatility hedge against GME
  - Redditor theory <https://archive.md/2gCxT>
  - Redditor summary incl AMC Ownership [https://www.reddit.com/r/FWFBThinkTank/comments/u4g8nv/why\\_i\\_think\\_amc\\_is\\_a\\_dead\\_cat\\_and\\_the\\_shorts\\_are/](https://www.reddit.com/r/FWFBThinkTank/comments/u4g8nv/why_i_think_amc_is_a_dead_cat_and_the_shorts_are/)
  - AMC frequent share dilution by Adam Aron CEO 2021-2023
    - Jan 2021 (164.7 million + 22 million)
    - May 2021 (43million) <https://investor.amctheatres.com/news-events/press-releases/detail/109/amc-entertainment-holdings-inc-completes-43-million-share-at-the-market-equity-offering-and-raises-428-million-in-additional-equity-capital>
    - June 2021 (8.5million) <https://investor.amctheatres.com/news-events/press-releases/detail/107/amc-entertainment-holdings-inc-raises-230-5-million-of-new-equity-from-mudrick-capital>
    - June 2021 (11million) <https://investor.amctheatres.com/news-events/press-releases/detail/105/amc-entertainment-holdings-inc-completes-11-550-million-share-at-the-market-equity-offering-raising-587-4-million-in-additional-equity-capital>
    - Dec 2022 (125.9million APE shares) <https://investor.amctheatres.com/news-events/press-releases/detail/37/amc-entertainment-holdings-inc-raises-162-million-through-sales-of-amc-preferred-equity-units-ape-since-launching-its-at-the-market-program-and-provides-business-update>

- Sale of \$110mil APE Shares to Antara Capital & APE conversion (Note APE & AMC had equal voting rights thus Antara had near 33% of voting rights through 'sale' of APE) <https://investor.amctheatres.com/news-events/press-releases/detail/36/amc-entertainment-holdings-inc-announces-110-million-equity-capital-raise-a-100-million-debt-for-equity-exchange-and-a-proposed-vote-to-convert-amc-preferred-equity-ape-units-into-amc-common-shares-and-implement-a-reverse-stock-split>
  - Sep 2023 (40million shares) <https://investor.amctheatres.com/news-events/press-releases/detail/12/amc-entertainment-holdings-inc-successfully-completes-at-the-market-equity-offering-raising-more-than-325-million-substantially-increasing-its-financial-resilience>
  - Dec 2023 (48million shares) <https://investor.amctheatres.com/news-events/press-releases/detail/346/amc-entertainment-holdings-inc-successfully-completes-350-million-at-the-market-equity-offering-and-reduces-debt-by-62-million-bolstering-liquidity-and-strengthening-the-balance-sheet>  
<https://deadline.com/2023/12/amc-entertainment-equity-offering-lowers-debt-movie-theaters-box-office-1235662877/>
  - Mar 2024 Announce further equity offering for up to \$250,000,000  
<https://www.streetinsider.com/Corporate+News/AMC+Entertainment+%28AMC%29+enters+into+an+equity+distribution+agreement/22991585.html>
- AMC Shareholders do not approve further dilution -> Adam Aron creates APE Special dividend up to 1 Billion Shares & after distribution of 1:1 APE:AMC shares (502million APE Shares) sold further APE to fund AMC (>126million APE Shares) -> Later AMC Reverse split & converted APE-> AMC Shares diluting shares significantly (502million pre split - >1.5billion shares outstanding calculated presplit)
- Forbes Summary <https://www.forbes.com/sites/investor-hub/article/amcs-1-for-10-reverse-stock-split-and-ape-conversion-explained/?sh=5d23a6796a62>
- Investors not wanting to increase authorised shares admitted by Adam Aron  
<https://investor.amctheatres.com/news-events/press-releases/detail/113/amc-entertainment-announces-at-the-market-offering-program-and-withdraws-proposal-to-increase-authorized-shares>
- AMC APE Announcement <https://investor.amctheatres.com/news-events/press-releases/detail/52/amc-entertainment-holdings-inc-announces-special-dividend-of-amc-preferred-equity-units>
- Sale of \$110mil APE Shares to Antara Capital & APE conversion (Note APE & AMC had equal voting rights thus Antara had near 33% of voting rights through 'sale' of APE)  
<https://investor.amctheatres.com/news-events/press-releases/detail/36/amc-entertainment-holdings-inc-announces-110-million-equity-capital-raise-a-100-million-debt-for-equity-exchange-and-a-proposed-vote-to-convert-amc-preferred-equity-ape-units-into-amc-common-shares-and-implement-a-reverse-stock-split>
- Dec 2022 (125.9million APE shares) <https://investor.amctheatres.com/news-events/press-releases/detail/37/amc-entertainment-holdings-inc-raises-162-million-through-sales-of-amc-preferred-equity-units-ape-since-launching-its-at-the-market-program-and-provides-business-update>
- Reddit identifying plan to skew voting rights & force APE conversion at time of issuance of APE  
[https://www.reddit.com/r/wallstreetbets/comments/wgg7iz/the\\_amc\\_preferred\\_equity\\_unit\\_and\\_how\\_adam\\_aron/](https://www.reddit.com/r/wallstreetbets/comments/wgg7iz/the_amc_preferred_equity_unit_and_how_adam_aron/)



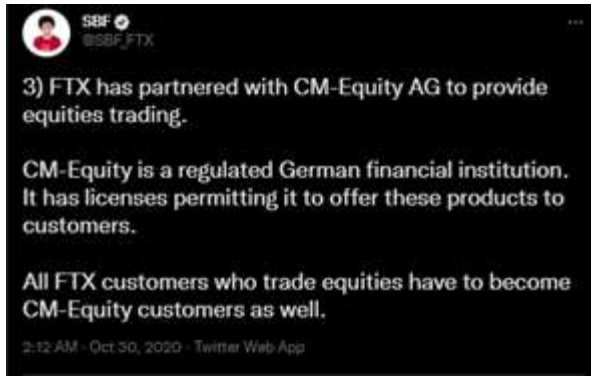
- Adam Aron (CEO) selling majority of personal shares  
<https://www.bloomberg.com/news/articles/2022-01-12/amc-s-ceo-says-he-s-done-selling-shares-42-million-later>

### 'ZOMBIE' STOCKS – BANKRUPT OTC STOCKS LIKELY CELLAR-BOXED

- Refer to below section on Expert markets & 'Zombie' stocks

### TOKENISED SECURITIES I.E. CRYPTO TOKENS AS LOCATES/COLLATERAL FOR SHORT SELLING / MARGIN

- Investopedia explanation <https://www.investopedia.com/terms/t/tokenized-equity.asp>
- Creation of cryptocurrency tokens that are tied to a stock & depending on source may be exchanged for the underlying stock/security
- FTX offered tokenized securities on American stocks such as GameStop (GME) – not issued by the issuer, advertised by FTX as 1:1 of token: stock & can be exchanged for underlying asset (stock) if requirements met (dependent on number/value of tokens & investor status). FTX offered this service via FTX Switzerland via CM-Equity AG, a German organisation that later claimed no such exchange offer provided & states partnership had ended in 31/12/21. FTX collapsed in 2022 due to active withdrawal of FTT (FTX proprietary coin) token (initiated by Binance Founder) & later confirmed misuse of customer funds/crypto to prop up FTT via funnelling customer funds through backdoor for Alameda Research (FTX subsidiary). DTCC accepted Cryptocurrency/tokenised securities as collateral (100% Haircut 2/5/24). GME FTX Tokens continue to be exchanged on the market (as cryptographically stored & exchanged)
  - Note – FTX founder charged & sentenced 25years for \$8Billion in fraud & conspiracy  
<https://www.ft.com/content/e4528411-eb3c-4fdc-8ebd-4132149b1924>
  - FTX Switzerland HQ confirmed as a letterbox by redditor physically going to registered address [https://www.reddit.com/r/Superstonk/comments/yxo0ch/apes\\_on\\_the\\_ground\\_breaking\\_ftx\\_switzerland\\_was\\_a/](https://www.reddit.com/r/Superstonk/comments/yxo0ch/apes_on_the_ground_breaking_ftx_switzerland_was_a/)
- FTX GME Tokenized Securities created on Jan 27 2021 at 4pm (1day prior to PCO)  
[https://www.reddit.com/r/Superstonk/comments/up2fov/cme\\_is\\_a\\_lie\\_crypto\\_is\\_a\\_scam\\_and\\_tokenized/](https://www.reddit.com/r/Superstonk/comments/up2fov/cme_is_a_lie_crypto_is_a_scam_and_tokenized/)
- Redditor summary & concerns about FTX tokenized stock  
[https://www.reddit.com/r/Superstonk/comments/xa7l2m/ftx\\_tokenized\\_stock\\_and\\_why\\_you\\_should\\_not\\_be/](https://www.reddit.com/r/Superstonk/comments/xa7l2m/ftx_tokenized_stock_and_why_you_should_not_be/)
- CM Equity & FTX Analysis (3 Parts) – Very detailed with evidence  
[https://www.reddit.com/r/Superstonk/comments/yyj1gz/german\\_dd\\_research\\_on\\_cmequity\\_a\\_g\\_and\\_all\\_ftx/](https://www.reddit.com/r/Superstonk/comments/yyj1gz/german_dd_research_on_cmequity_a_g_and_all_ftx/)  
[https://www.reddit.com/r/Superstonk/comments/yyjxaz/german\\_dd\\_research\\_on\\_cmequity\\_a\\_g\\_and\\_all\\_ftx/](https://www.reddit.com/r/Superstonk/comments/yyjxaz/german_dd_research_on_cmequity_a_g_and_all_ftx/)  
[https://www.reddit.com/r/Superstonk/comments/yykns2/german\\_dd\\_research\\_on\\_cmequity\\_a\\_g\\_and\\_all\\_ftx/](https://www.reddit.com/r/Superstonk/comments/yykns2/german_dd_research_on_cmequity_a_g_and_all_ftx/)
- Sam Bankman-Fried (Founder FTX) tweet announcing tokenized stocks via CM Equity -  
[https://twitter.com/SBF\\_FTX/status/1321983277293449216](https://twitter.com/SBF_FTX/status/1321983277293449216)



- CM-Equity GME Tokenized stocks contract (no exchange available) [https://products.cm-equity.de/wp-content/uploads/2021/05/20210528\\_FTX\\_GME\\_EN.pdf](https://products.cm-equity.de/wp-content/uploads/2021/05/20210528_FTX_GME_EN.pdf)

What is this product?

**Type**  
The Tokenized Stocks offered here are bilateral OTC derivative contracts whose performance is linked to the performance of the shares of GAMESTOP (GME) CLASS A ("underlying"). Redeemable in connection with issued Tokenized Stocks are offered exclusively on 2021.05.28 at 10:00. The buying and selling prices are provided by CM-E (last). There may be a reasonable difference between the buying and selling price (bid-ask spread). The Tokenized Stocks are not freely transferable and can only be bought from CM-E and sold back to CM-E. There is no multilateral trading facility (so-called OTC market) for the Tokenized Stocks. The Tokenized Stocks are perpetual and can be terminated at any time by either party. The Tokenized Stocks are subject to German law.

**Objectives**  
The aim of this product is to grant you a determinable claim that depends on the price development of the underlying. This means that buyers of the Tokenized Stocks have neither a claim to delivery of the underlying nor shareholder rights of shareholders - such as profit participation or voting rights. It is not possible for us to make a recommendation on the holding period.

Underlying	GAMESTOP CORP CLASS A	ISIN of underlying	US3046791009
Type of underlying	SHARES	Token symbol	GME
Currency of underlying	USD	Risk class of the underlying	B

- CM Equity claiming no insolvency post FTX Alameda & no connection with Alameda <https://cm-equity.de/en/rectification-to-the-publication-alameda-research-llc/> (Archived)



- Redditor documenting CoinMarketCap stating Tokenized stock managed by CM Equity & tokens can be exchanged for stock [https://www.reddit.com/r/Superstonk/comments/yukf1s/gme\\_tokenized\\_stock\\_it\\_gets\\_worse\\_coinmarketcap/](https://www.reddit.com/r/Superstonk/comments/yukf1s/gme_tokenized_stock_it_gets_worse_coinmarketcap/)

**CoinmarketCap Says:**

What are tokenized stocks?

Equities are stocks that trade on traditional regulated exchanges. FTX lists tokens on select equities. These spot tokens are backed by shares of stock, custodied by CM-Equity. They can be redeemed with CM-Equity for the underlying shares if desired.

**CM-Equity Key Information Document Says:**

**Objectives**  
The aim of this product is to grant you a determinable claim that depends on the price development of the underlying. This means that buyers of the Tokenized Stocks have neither a claim to delivery of the underlying nor shareholder rights of shareholders - such as profit participation or voting rights. It is not possible for us to make a recommendation on the holding period.

Underlying	GAMESTOP CORP CLASS A	ISIN of underlying	US3046791009
Type of underlying	SHARES	Token symbol	GME
Currency of underlying	USD	Risk class of the underlying	B

- FTX site regarding tokenized stocks & CM Equity <https://help.ftx.com/hc/en-us/articles/360051229472-Equities> (Archived - <https://web.archive.org/web/20210801182828/https://help.ftx.com/hc/en-us/articles/360051229472-Equities> )



“What exactly is traded on FTX? FTX itself lists tokens on the equities. For instance, [ftx.com/trade/TSLA/USD](https://ftx.com/trade/TSLA/USD) is a market to trade tokens on Tesla stock. These spot tokens are backed by shares of Tesla stock custodied by CM-Equity. They can be redeemed with CM-Equity for the underlying shares if desired. In the future, there may be other ways to withdraw the tokens from FTX. If you are interested in getting set up to redeem the stocks, please email [support](#).”

- FTX vs CM Equity Court Document <https://restructuring.ra.kroll.com/FTX/Home-DownloadPDF?id1=MzA5NTU5Ng==&id2=-1> / Reddit Key pages re: [https://www.reddit.com/r/Superstonk/comments/1c181jv/ftxbinance\\_cmequity\\_tokenized\\_stocks\\_used\\_as/](https://www.reddit.com/r/Superstonk/comments/1c181jv/ftxbinance_cmequity_tokenized_stocks_used_as/)
- FTX Court Document <https://restructuring.ra.kroll.com/FTX/Home-DownloadPDF?id1=MjYxNDg5Nw==&id2=-1> / Reddit Video re: [https://www.reddit.com/r/Superstonk/comments/18suvnd/tokenized\\_stock\\_list\\_proof\\_at\\_ftxbinance/](https://www.reddit.com/r/Superstonk/comments/18suvnd/tokenized_stock_list_proof_at_ftxbinance/)
- GME FTX Token still trading <https://defiscan.live/dex/dGME-DUSD/> / <https://www.coingecko.com/en/coins/gamestop-tokenized-stock-defichain>
- Brett Harrison FTX US President stating 1:1 Token for GME Share [https://www.reddit.com/r/Superstonk/comments/17hui3f/an\\_old\\_video\\_of\\_brett\\_harrison\\_former\\_head\\_of\\_ftx/](https://www.reddit.com/r/Superstonk/comments/17hui3f/an_old_video_of_brett_harrison_former_head_of_ftx/)
- Full Brett Harrison AMA w GME Investors <https://www.youtube.com/watch?v=pbjQHT73NKg>
- FTX Switzerland identified as a letterbox company by Redditor physically visiting listed location (w photos) [https://www.reddit.com/r/Superstonk/comments/yxo0ch/apes\\_on\\_the\\_ground\\_breaking\\_ftx\\_switzerland\\_was\\_a/](https://www.reddit.com/r/Superstonk/comments/yxo0ch/apes_on_the_ground_breaking_ftx_switzerland_was_a/)
- Reddit post showing evidence of connection between FTX, Citadel, CM Equity, Signature & Silvergate banks [https://www.reddit.com/r/Superstonk/comments/125ur93/part\\_5\\_the\\_spiderweb\\_of\\_cmequity\\_ag\\_ongoing/](https://www.reddit.com/r/Superstonk/comments/125ur93/part_5_the_spiderweb_of_cmequity_ag_ongoing/)
- Prospectus of Alternate source of Tokenized stock GME on FTX via DAAG GmbH on Solana [https://www.lb.lt/uploads/prospectuses/docs/32126\\_fae60d37ed5a1ccbe9ca80b23f3ec7b7.pdf](https://www.lb.lt/uploads/prospectuses/docs/32126_fae60d37ed5a1ccbe9ca80b23f3ec7b7.pdf) [https://www.reddit.com/r/Superstonk/comments/10qi4ca/gme\\_ftx\\_token\\_prospectus\\_located\\_link\\_in\\_comments/](https://www.reddit.com/r/Superstonk/comments/10qi4ca/gme_ftx_token_prospectus_located_link_in_comments/)
- Suspected after CMEquity ceased in 31/12/21, FTX continued via DAAG above [https://www.reddit.com/r/Superstonk/comments/10uh8f4/ftx\\_may\\_have\\_been\\_able\\_to\\_sell\\_their\\_tokenised/](https://www.reddit.com/r/Superstonk/comments/10uh8f4/ftx_may_have_been_able_to_sell_their_tokenised/)

- Term used to describe suspected collusion between 2 or more market participants to place sequentially lower prices (buy/sell between each other) in small volumes to reduce share price, especially effective whilst purchasing of shares was restricted for retail investors via forced position close only <https://seekingalpha.com/instablog/11442671-gerald-klein/3096735-anatomy-of-a-short-attack> (written 2014) / <https://www.sofi.com/learn/content/what-is-a-short-ladder-attack/>
- Illegal as per Section 78i(a) (2) <https://www.law.cornell.edu/uscode/text/15/78i>



### STOP HUNTING (TRIGGERING STOP-LOSS)

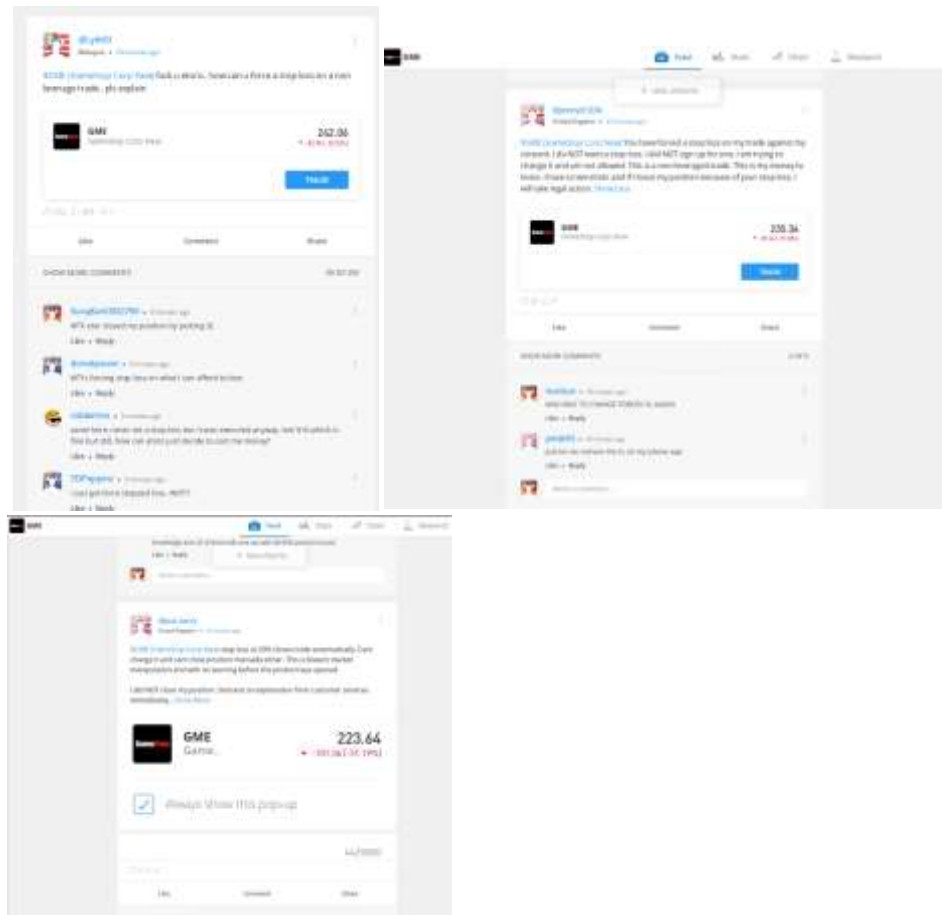
- Stop loss – An order which is fulfilled when a set price is reached (offered by retail brokers as an order ‘designed’ to limit losses by automatically executing a sell (or buy in if short) when price moves against position <https://www.investopedia.com/articles/stocks/09/use-stop-loss.asp>
  - I.e. AAPL Share \$100, 20% Stop loss order set by investor, if price drops below \$80/share position (20% of share price) is automatically sold
- Stop Hunting - Investopedia explanation - “Stop-hunting is a strategy to force others in the market out of their positions by triggering stop-loss orders” <https://www.investopedia.com/terms/s/stophunting.asp>
  - i.e. moving the price via mechanisms in this document can reduce share price triggering Stop-loss orders in retail investor accounts leading to early divesting of shares by retail & trigger further downward pressure on stock (as sell orders hit market) allowing triggering parties to purchase stocks for cheaper / benefit from reduced price
- Etoro (Broker) forced stop-loss (claimed automatically set) on GME positions (minimum 20%) on 1/2/21 (during week of Jan 2021 event & PCO) causing early closing(selling) of retail held shares
  - Etoro Response - [https://www.etoro.com/posts/0\\_entry\\_91bad23b-44dc-4082-bb6a-f6bc875987cb](https://www.etoro.com/posts/0_entry_91bad23b-44dc-4082-bb6a-f6bc875987cb) (archived - <https://archive.md/hLmTN>) " INCIDENT RECAP On Monday February 1, 2021, the maximum stop loss on some stocks was set to 20% in error. This issue only affected users who opened positions on specific stocks \*on Monday before 17:19 GMT\* when the issue was identified and resolved. We would like to apologize for the inconvenience caused to users. If you were affected, please read the following information: 1. For users whose positions were closed by stop loss: Please rest assured that our teams will contact each and every affected user via email. 2. For users whose positions are still open: A. Users who did not adjust stop loss on the positions they opened \*on Monday before 17:19 GMT\* - Please note that

the stop loss setting on these trades will be returned to normal \*before market open\*, i.e. as if the issue had not occurred. B. Users who made changes to their stop loss on Monday before 17:19 GMT and still have open positions - Kindly note that eToro has not overridden the changes you made to these positions. We urge you to check these trades to ensure you are happy with the stop loss you have put in place. If you wish to adjust the stop loss on these trades, you can do so without adding additional margin. In addition, funds added on Monday before 17:19 GMT to extend your stop loss, will be returned to your balance automatically upon any subsequent stop loss change. Once again we would like to apologise for the inconvenience caused and to thank you for your understanding. " – News article

<https://fxnewsgroup.com/forex-news/retail-forex/etoro-issues-refund-confirmation-following-stop-loss-incident/>

- Evid

[https://www.reddit.com/r/wallstreetbets/comments/la6ebf/etoro\\_platform\\_is\\_forcing\\_s\\_top\\_loss\\_on\\_gme/](https://www.reddit.com/r/wallstreetbets/comments/la6ebf/etoro_platform_is_forcing_s_top_loss_on_gme/)



- Evid Stop loss not able to remove

[https://www.reddit.com/r/wallstreetbets/comments/lad20v/etoro\\_steals\\_gme\\_from\\_their\\_users\\_proof\\_here/](https://www.reddit.com/r/wallstreetbets/comments/lad20v/etoro_steals_gme_from_their_users_proof_here/)

- More Evid

[https://www.reddit.com/r/Etoro/comments/la5654/yes\\_etoro\\_automatically\\_sets\\_an\\_unremovable\\_20/](https://www.reddit.com/r/Etoro/comments/la5654/yes_etoro_automatically_sets_an_unremovable_20/)

- More Evid

[https://www.reddit.com/r/Etoro/comments/lat4bm/etoro\\_just\\_forced\\_a\\_20\\_stop\\_loss\\_that\\_i\\_did\\_not/](https://www.reddit.com/r/Etoro/comments/lat4bm/etoro_just_forced_a_20_stop_loss_that_i_did_not/)

- More  
[https://www.reddit.com/r/Etoro/comments/lls9l2/etoro\\_will\\_not\\_refund\\_the\\_money\\_i\\_lost\\_from\\_their/](https://www.reddit.com/r/Etoro/comments/lls9l2/etoro_will_not_refund_the_money_i_lost_from_their/)
- [https://www.reddit.com/r/Etoro/comments/la4pgr/etoro\\_set\\_a\\_sl\\_for\\_gme\\_and\\_wont\\_let\\_me\\_change/](https://www.reddit.com/r/Etoro/comments/la4pgr/etoro_set_a_sl_for_gme_and_wont_let_me_change/)
- From eToro Site [https://www.etoro.com/posts/0\\_entry\\_8d51116a-e93b-47d5-9dbb-3a18cbe83385](https://www.etoro.com/posts/0_entry_8d51116a-e93b-47d5-9dbb-3a18cbe83385)

### SHORT SALE RESTRICTION (SSR) / ALTERNATIVE UPTICK RULE

- SEC rule adoption 2011 - <https://www.sec.gov/answers/shortrestrict>
- If share price drop >10% within a day then short selling is only permitted on an uptick (if price is higher than last trade). Applies very limited restrictions on futures. Restriction applies on day triggered & following trading day. <https://www.investopedia.com/terms/u/uptickrule.asp>

### FORCING HALTS ON EXCHANGE I.E. NYSE VIA LIMIT UP LIMIT DOWN (LULD) HALT BY RAPIDLY INCREASING LULD VOLATILITY FOR BRIEF PERIOD OF TIME

- Halt a single stock if share price exceeds/falls below a certain percent (dependent on tier of stock & time – if closer to market close, allowed larger variance, GME 5%). Stock is first in limit state for 15seconds. If not reverted -> 5min Halt Buying + Selling
- NYSE LULD Halt FAQ (Plus other halts) - <https://www.nasdaq.com/articles/all-about-lulds>

**Market Guardrails Cheat Sheet**

Address market-wide volatility. Halt all NMS securities when S&P 500 index declines by the following levels.			
<b>Market-Wide Circuit Breaker</b>	S&P 500 Index Trigger	Open 1-2pm	8:30pm Close
	7%	Halt - for 15 minutes	Full stop halt
	13%	Halt - for 15 minutes	NOI not halt
	20%	Halt - Remainder of the trading day	Halt - Remainder of the trading day
Address volatility within a single stock. Lulds are implemented based on the guard rails and may result in a 15 second "Limit State," followed by a 5 minute "Trading Halt," if the NMS does not return inside the guard rails.			
<b>Limit Up Limit Down</b>	Tier 1 Stocks < \$1.00	Open 1-2pm	8:30pm Close
	S&P 500, based on high volume (TV)	5%	15%
	Tier 2 Stocks > \$1.00	5%	15%
	30 other stocks and ETFs (1)	5%	15%
	Stock price > \$1.75 - \$3.00	10%	40%
	Stock price < \$0.75	75%	150%
Leveraged ETFs/ETNs: Above 4 leverage Above 4 leverage			
<b>Order Imbalance Triggers</b>	Address associations with an obvious error in terms of price, number of shares or identification of the security. The following thresholds are applied to the last order book when determining whether a transaction is clearly erroneous.		
	Regular Trading Hours: Pre-Open & After Hours		
	Market Price up to 5%	20%	10%
	Market Price: \$25 - \$50	5%	15%
	Market Price above \$75	1%	5%
There are <b>no LULDs</b> for groups of stocks that trade 15 in a short period of time. Leveraged ETFs/ETNs: Above 4 leverage Above 4 leverage			

- GME underwent several LULD Halts –
  - 2021
    - Jan - 25/1/21(x9), 26/1/21 (x5), 27/1/21 (x3), 28/1/21(x19), 29/1/21
    - Feb - 1/2/21, 2/2/21(x5), 5/2/21 (x3), 24/2/21 (x2), 25/2/21(x4)
    - Mar - 10/3/21(x7), 15/3/21
  - 2022 - 29/3/22, 12/5/22(x4), 8/8/22(x2), 16/8/22, 31/10/22 (x2)
- All Trade Halt Data <https://www.nyse.com/trade-halt>
- Suspect that LULD actively triggered to halt stock when MM/Broker-dealers unable to confine share price
  - One theory suggests triggering LULD by rapidly bidding price up 5% then remove all bids to <5% & shift all other orders off-exchange (Note halts in 2022 followed similar pattern of exponentially increasing price followed by sudden & sustained decline in price post halt + ETrade Tape showing orders over 15sec with no change in price)
- 29/3/22 Halt
  - Redditor analysis of 29/3/22 Halt w screenshots of activated alerts & video of prices higher than GME has ever reached prior to 2024

[https://www.reddit.com/r/Superstonk/comments/trd2lj/the\\_trading\\_halt\\_was\\_a\\_removal\\_of\\_the\\_buy\\_button/](https://www.reddit.com/r/Superstonk/comments/trd2lj/the_trading_halt_was_a_removal_of_the_buy_button/)

- Redditor screenshot of Price before halt 29/3/22 (>\$448,000/sh)

[https://www.reddit.com/r/wallstreetbets/comments/tr55d1/gme\\_reached\\_448950\\_seconds\\_before\\_halt\\_i\\_was/](https://www.reddit.com/r/wallstreetbets/comments/tr55d1/gme_reached_448950_seconds_before_halt_i_was/)

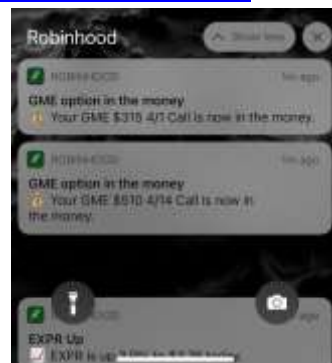


- Redditor screenshot ask of >\$448,000/Sh



- Redditor received price alert stating Calls became ITM (Strike Price \$510 – GME never reached that price on 29/3/23)

[https://www.reddit.com/r/Superstonk/comments/tr0byu/did\\_anybody\\_get\\_in\\_the\\_money\\_notifications\\_prior/](https://www.reddit.com/r/Superstonk/comments/tr0byu/did_anybody_get_in_the_money_notifications_prior/)



- Another redditor corroborates with their own alert (GME & XRT ETF)

<https://i.imgur.com/wDJaRQQ.jpg>



- Video immediately prior halt 29/3/22  
<https://twitter.com/i/status/1508802361380200449>

- 12/5/22 Halt

- Redditor providing evidence suggestive 12/5/22 halt not initiated by LULD volatility & evidence of NASDAQ quoting halt as M Code – suspect secondary to ECN(MM) failure (includes 1min chart May12th – Note rapid increase followed by sudden & sustained decline post halt)

[\(https://www.reddit.com/r/Superstonk/comments/uoywgb/the\\_gme\\_trading\\_halts\\_on\\_may\\_12\\_were\\_not\\_due\\_to/](https://www.reddit.com/r/Superstonk/comments/uoywgb/the_gme_trading_halts_on_may_12_were_not_due_to/)

Halts	Symbol	Sector	Trade Date	Market	Reason Code	Market Reason	Secondary Code	Secondary Reason	Secondary Time Zone
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					
✓	0000000000	Common Stock	05/12/22	A					



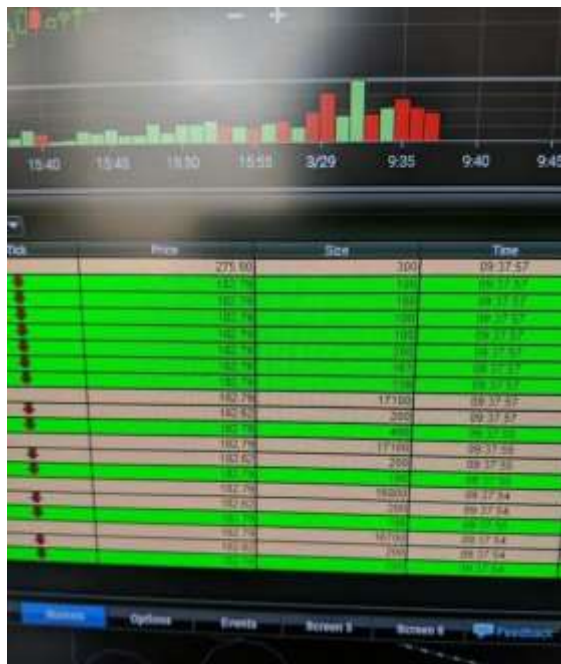


- Another post noting Halt Code M, LULD for other Stocks  
[https://www.reddit.com/r/Superstonk/comments/wpzyxc/luld\\_all\\_over\\_the\\_place\\_but\\_gme\\_got\\_a\\_reason\\_code/](https://www.reddit.com/r/Superstonk/comments/wpzyxc/luld_all_over_the_place_but_gme_got_a_reason_code/)

Aug 18, 2022

Halt Date	Halt Time	Reason Symbol	Reason Name	Market	Reason Code	Price Threshold Price	Resumption Date	Resumption Start Time	Resumption Trade Time
08/18/2022	11:31:07	888Y	Red Bull U.S. Regional Inc.	NASDAQ	LULD		08/18/2022	11:31:07	11:40:07
08/18/2022	11:31:38	888V	Genentech Corporation Common Stock	NASDAQ	M		08/18/2022	11:31:38	11:37:09
08/18/2022	11:37:09	888V	Genentech Corporation Common Stock	NASDAQ	LULD		08/18/2022	11:37:09	11:53:04
08/18/2022	11:54:07	EXCCP	Cardinal Pharmaceutical Products	NASDAQ	LULD		08/18/2022	11:54:07	08:00:07
08/18/2022	12:00:48	COOL	Timberline Energy Services Inc	NASDAQ	LULD		08/18/2022	12:00:48	12:05:48

- Post showing order of \$275 (Trading price \$182.70 at time) at 9:37 on 12/5/22 prior to 10:14 halt  
[https://www.reddit.com/r/Superstonk/comments/tr6xqj/275\\_found\\_on\\_the\\_tape\\_before\\_the\\_halt/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=iossmf](https://www.reddit.com/r/Superstonk/comments/tr6xqj/275_found_on_the_tape_before_the_halt/?utm_source=share&utm_medium=ios_app&utm_name=iossmf)



- Unusual trades occurring immediately before halt (maintained for 15sec necessary for halt) 12/5/22  
[https://www.reddit.com/r/Superstonk/comments/trvc14/todays\\_trade\\_tape\\_from\\_etra\\_de\\_shows\\_76/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=iossmf](https://www.reddit.com/r/Superstonk/comments/trvc14/todays_trade_tape_from_etra_de_shows_76/?utm_source=share&utm_medium=ios_app&utm_name=iossmf)

Price	Size	Time	Exchange	DYF
182.9000	100	8:42:37	NYSE	0.0000
182.9100	100	8:42:37	NYSE	0.0000
182.9200	200	8:42:37	NYSE	0.0000
182.9300	300	8:42:37	NYSE	0.0000
182.9400	400	8:42:37	NYSE	0.0000
182.9500	500	8:42:37	NYSE	0.0000
182.9600	600	8:42:37	NYSE	0.0000
182.9700	700	8:42:37	NYSE	0.0000
182.9800	800	8:42:37	NYSE	0.0000
182.9900	900	8:42:37	NYSE	0.0000
183.0000	1000	8:42:37	NYSE	0.0000
183.0100	1100	8:42:37	NYSE	0.0000
183.0200	1200	8:42:37	NYSE	0.0000
183.0300	1300	8:42:37	NYSE	0.0000
183.0400	1400	8:42:37	NYSE	0.0000
183.0500	1500	8:42:37	NYSE	0.0000
183.0600	1600	8:42:37	NYSE	0.0000
183.0700	1700	8:42:37	NYSE	0.0000
183.0800	1800	8:42:37	NYSE	0.0000
183.0900	1900	8:42:37	NYSE	0.0000
183.1000	2000	8:42:37	NYSE	0.0000
183.1100	2100	8:42:37	NYSE	0.0000
183.1200	2200	8:42:37	NYSE	0.0000
183.1300	2300	8:42:37	NYSE	0.0000
183.1400	2400	8:42:37	NYSE	0.0000
183.1500	2500	8:42:37	NYSE	0.0000
183.1600	2600	8:42:37	NYSE	0.0000
183.1700	2700	8:42:37	NYSE	0.0000
183.1800	2800	8:42:37	NYSE	0.0000
183.1900	2900	8:42:37	NYSE	0.0000
183.2000	3000	8:42:37	NYSE	0.0000
183.2100	3100	8:42:37	NYSE	0.0000
183.2200	3200	8:42:37	NYSE	0.0000
183.2300	3300	8:42:37	NYSE	0.0000
183.2400	3400	8:42:37	NYSE	0.0000
183.2500	3500	8:42:37	NYSE	0.0000
183.2600	3600	8:42:37	NYSE	0.0000
183.2700	3700	8:42:37	NYSE	0.0000
183.2800	3800	8:42:37	NYSE	0.0000
183.2900	3900	8:42:37	NYSE	0.0000
183.3000	4000	8:42:37	NYSE	0.0000
183.3100	4100	8:42:37	NYSE	0.0000
183.3200	4200	8:42:37	NYSE	0.0000
183.3300	4300	8:42:37	NYSE	0.0000
183.3400	4400	8:42:37	NYSE	0.0000
183.3500	4500	8:42:37	NYSE	0.0000
183.3600	4600	8:42:37	NYSE	0.0000
183.3700	4700	8:42:37	NYSE	0.0000
183.3800	4800	8:42:37	NYSE	0.0000
183.3900	4900	8:42:37	NYSE	0.0000
183.4000	5000	8:42:37	NYSE	0.0000
183.4100	5100	8:42:37	NYSE	0.0000
183.4200	5200	8:42:37	NYSE	0.0000
183.4300	5300	8:42:37	NYSE	0.0000
183.4400	5400	8:42:37	NYSE	0.0000
183.4500	5500	8:42:37	NYSE	0.0000
183.4600	5600	8:42:37	NYSE	0.0000
183.4700	5700	8:42:37	NYSE	0.0000
183.4800	5800	8:42:37	NYSE	0.0000
183.4900	5900	8:42:37	NYSE	0.0000
183.5000	6000	8:42:37	NYSE	0.0000
183.5100	6100	8:42:37	NYSE	0.0000
183.5200	6200	8:42:37	NYSE	0.0000
183.5300	6300	8:42:37	NYSE	0.0000
183.5400	6400	8:42:37	NYSE	0.0000
183.5500	6500	8:42:37	NYSE	0.0000
183.5600	6600	8:42:37	NYSE	0.0000
183.5700	6700	8:42:37	NYSE	0.0000
183.5800	6800	8:42:37	NYSE	0.0000
183.5900	6900	8:42:37	NYSE	0.0000
183.6000	7000	8:42:37	NYSE	0.0000
183.6100	7100	8:42:37	NYSE	0.0000
183.6200	7200	8:42:37	NYSE	0.0000
183.6300	7300	8:42:37	NYSE	0.0000
183.6400	7400	8:42:37	NYSE	0.0000
183.6500	7500	8:42:37	NYSE	0.0000
183.6600	7600	8:42:37	NYSE	0.0000
183.6700	7700	8:42:37	NYSE	0.0000
183.6800	7800	8:42:37	NYSE	0.0000
183.6900	7900	8:42:37	NYSE	0.0000
183.7000	8000	8:42:37	NYSE	0.0000
183.7100	8100	8:42:37	NYSE	0.0000
183.7200	8200	8:42:37	NYSE	0.0000
183.7300	8300	8:42:37	NYSE	0.0000
183.7400	8400	8:42:37	NYSE	0.0000
183.7500	8500	8:42:37	NYSE	0.0000
183.7600	8600	8:42:37	NYSE	0.0000
183.7700	8700	8:42:37	NYSE	0.0000
183.7800	8800	8:42:37	NYSE	0.0000
183.7900	8900	8:42:37	NYSE	0.0000
183.8000	9000	8:42:37	NYSE	0.0000
183.8100	9100	8:42:37	NYSE	0.0000
183.8200	9200	8:42:37	NYSE	0.0000
183.8300	9300	8:42:37	NYSE	0.0000
183.8400	9400	8:42:37	NYSE	0.0000
183.8500	9500	8:42:37	NYSE	0.0000
183.8600	9600	8:42:37	NYSE	0.0000
183.8700	9700	8:42:37	NYSE	0.0000
183.8800	9800	8:42:37	NYSE	0.0000
183.8900	9900	8:42:37	NYSE	0.0000
183.9000	10000	8:42:37	NYSE	0.0000

**5th column (Diff) shows difference in execution price compared to previous trade**

**Total Trades with 50 diff in execution price: 76**

**Size sum: 7,712**  
**A size of 1 = 100 shares so...**

**7,712 x 100 = 771,200 Shares**

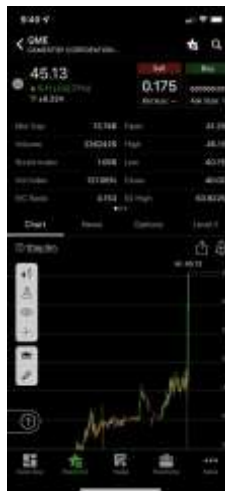
**We see the exact same thing at 9:42 AM, only this time it's lower volume across 28 trades**

Price	Size	Time	Exchange	DYF
183.7000	100	9:42:37	NYSE	0.0000
183.7100	100	9:42:37	NYSE	0.0000
183.7200	100	9:42:37	NYSE	0.0000
183.7300	100	9:42:37	NYSE	0.0000
183.7400	100	9:42:37	NYSE	0.0000
183.7500	100	9:42:37	NYSE	0.0000
183.7600	100	9:42:37	NYSE	0.0000
183.7700	100	9:42:37	NYSE	0.0000
183.7800	100	9:42:37	NYSE	0.0000
183.7900	100	9:42:37	NYSE	0.0000
183.8000	100	9:42:37	NYSE	0.0000
183.8100	100	9:42:37	NYSE	0.0000
183.8200	100	9:42:37	NYSE	0.0000
183.8300	100	9:42:37	NYSE	0.0000
183.8400	100	9:42:37	NYSE	0.0000
183.8500	100	9:42:37	NYSE	0.0000
183.8600	100	9:42:37	NYSE	0.0000
183.8700	100	9:42:37	NYSE	0.0000
183.8800	100	9:42:37	NYSE	0.0000
183.8900	100	9:42:37	NYSE	0.0000
183.9000	100	9:42:37	NYSE	0.0000

- 8/8/22 Halt
  - Reddit Screenshot price \$125.88 at time of halt (Price only reached \$47.96 high on 8/8/22)
    - [https://www.reddit.com/r/Superstonk/comments/wj9mdy/why\\_do\\_i\\_get\\_this\\_during\\_the\\_halt/](https://www.reddit.com/r/Superstonk/comments/wj9mdy/why_do_i_get_this_during_the_halt/)



- Redditor screenshot of \$500,000 ask at time of halt  
[https://www.reddit.com/r/Superstonk/comments/wjbzoe/another\\_glitch\\_on\\_the\\_bidask\\_spread\\_during\\_the/](https://www.reddit.com/r/Superstonk/comments/wjbzoe/another_glitch_on_the_bidask_spread_during_the/)

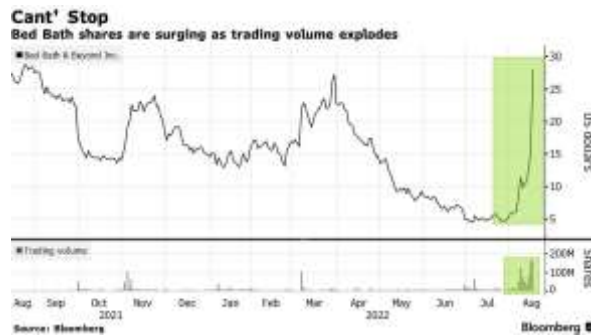


- Susquehanna Margin called by DTCC at 9:38:28ET after 1<sup>st</sup> halt at 9:36:14ET & before 2<sup>nd</sup> halt 9:45:30ET  
[https://www.reddit.com/r/Superstonk/comments/wjkgg0/check\\_the\\_timestamps\\_on\\_yesterdays\\_halts/](https://www.reddit.com/r/Superstonk/comments/wjkgg0/check_the_timestamps_on_yesterdays_halts/)

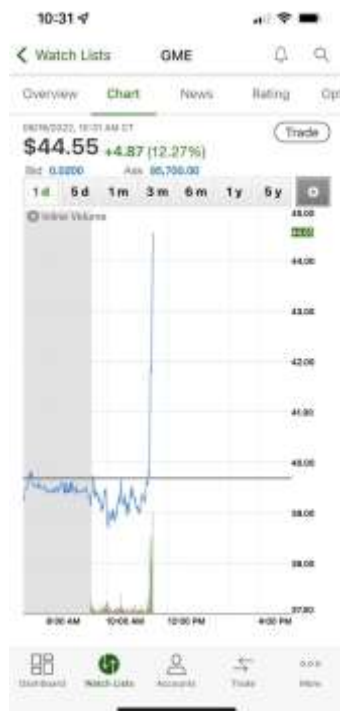


- BBBY had a sudden 40% share price increase on 8/8/22 + AMC 8% (Suggestive of basket swap) <https://www.reuters.com/business/retail-consumer/bed-bath-beyond-jumps-retail-investors-chase-highly-shorted-stocks-2022-08-08/> + <https://www.bloomberg.com/news/articles/2022-08-16/bed-bath-beyond-s-510-surge-defies-wall-street-naysayers>
  - HKD Halted 20 times on 8/8/22 (Suspiciously high surges in price 500-1000%, suspected to be used as collateral for margin)  
[https://www.reddit.com/r/Superstonk/comments/wjzst/hkd\\_was\\_halted\\_20\\_times\\_in\\_1\\_day\\_stop\\_saying\\_it/](https://www.reddit.com/r/Superstonk/comments/wjzst/hkd_was_halted_20_times_in_1_day_stop_saying_it/)
- 16/8/22 Halt
- Halt correlated with RC Ventures 13D Filing (16/8/22) with increased BBBY ownership (11.8% vs 9.8% prev) due to share buybacks by BBBY Board <https://fintel.io/news/rc-ventures-llc-modifies-stake-in-bed-bath-beyond-inc-nasdaq-bbby-0.09628051147729644>

- On same day BBBY had 360million shares traded with only 80million shares outstanding (4x of all shares traded on market on a single day!) & similarly halted (possible evidence of basket swap) <https://www.bloomberg.com/news/articles/2022-08-16/bed-bath-beyond-s-510-surge-defies-wall-street-naysayers>



- Reddit analysis of BBBY & GME correlation [https://www.reddit.com/r/Superstonk/comments/wqcgaa/return\\_of\\_duckery\\_tickers\\_th\\_at\\_traded\\_above\\_the/](https://www.reddit.com/r/Superstonk/comments/wqcgaa/return_of_duckery_tickers_th_at_traded_above_the/)
- Screenshot of price before halt <https://www.reddit.com/r/Superstonk/comments/wpxccz/halt/>



- 31/10/22 Halt
    - GameStop announces official release of NFT Marketplace with Immutable X <https://news.gamestop.com/news-releases/news-release-details/gamestops-nft-marketplace-launches-immutablex>
    - S3 Partners Managing Director Bob Sloan says if GME exceeds \$30 share price 'something' will go 'parabolic' (same S3 Partners that provide Short Interest data analysis & changed calculations) <https://www.youtube.com/watch?v=UU6oSRpnc5Y> + <https://finance.yahoo.com/video/gamestop-stock-goes-above-30-151834745.html> + <https://www.thestreet.com/memestocks/gme/short-squeeze-alert-gme-going-parabolic-says-s3-partners-ceo>
    - Share Price drops post halt (Max share price that day \$34.99, \$31.22 at open)



- Halt Price at \$32.88 for accelerating up & another halt 15mins later at \$32.05 for accelerating down (only 83cents difference)  
[https://www.reddit.com/r/Superstonk/comments/yimvcv/halt\\_twice\\_in\\_10\\_minutes\\_for\\_less\\_than\\_83/](https://www.reddit.com/r/Superstonk/comments/yimvcv/halt_twice_in_10_minutes_for_less_than_83/)



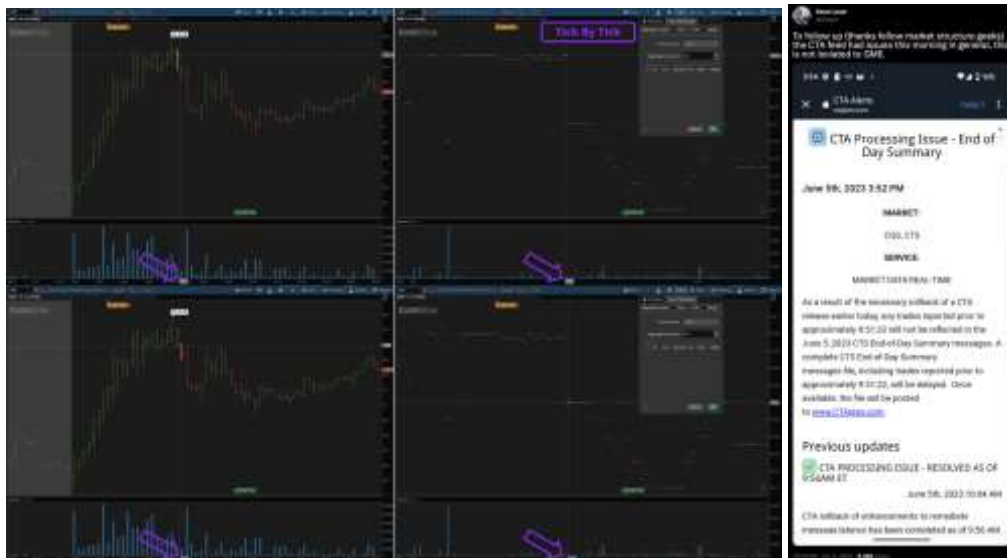
- CMC Markets 'Data Feed Error' on 31/10/22 22mins into open & 35 mins before close prior trading day – specific to GME ticker only – Note as per redditor moved to open/close only by phone & shutdown online chat  
[https://www.reddit.com/r/Superstonk/comments/yj6ln7/cmc\\_markets\\_stopped\\_trading\\_gme\\_35\\_minutes\\_before/](https://www.reddit.com/r/Superstonk/comments/yj6ln7/cmc_markets_stopped_trading_gme_35_minutes_before/)



- LULD Plan created & maintained by LULD Plan Committee headed by staff from Citadel Securities, Virtu, CBOE, State Street, Black rock etc  
[https://www.reddit.com/r/Superstonk/comments/wv6qg5/the\\_luld\\_committee\\_decides\\_which\\_price\\_stocks\\_get/](https://www.reddit.com/r/Superstonk/comments/wv6qg5/the_luld_committee_decides_which_price_stocks_get/)



- FINRA Rule Proposal to add ETFs into Tier 1 (highest tier with tightest price restrictions) – explicitly state LULD Halt to stop prices moving away from market defined value, rule necessitated by ‘Meme stock craze’  
<https://public-inspection.federalregister.gov/2023-25543.pdf>  
[https://www.reddit.com/r/Superstonk/comments/1855719/exchanges\\_working\\_together\\_with\\_finra\\_to\\_help/](https://www.reddit.com/r/Superstonk/comments/1855719/exchanges_working_together_with_finra_to_help/)
- Trading can occur during Trading Halts, simply not on-exchange  
[https://www.researchgate.net/publication/228427223\\_The\\_Informativeness\\_of\\_Off-NYSE\\_Trading\\_During\\_NYSE\\_Market\\_Closures](https://www.researchgate.net/publication/228427223_The_Informativeness_of_Off-NYSE_Trading_During_NYSE_Market_Closures)  
<https://www.sciencedirect.com/science/article/abs/pii/S1042957311000106>
- Other Stocks LULD on Jan 2021  
[https://www.reddit.com/r/Superstonk/comments/vcsnj2/an\\_analysis\\_of\\_every\\_stock\\_that\\_had\\_an\\_luld\\_halt/](https://www.reddit.com/r/Superstonk/comments/vcsnj2/an_analysis_of_every_stock_that_had_an_luld_halt/)
- Unofficial ‘halt’ with Negative Share Volume– 5/6/23 – 9:51-9:56am – No trades on GME on several data feeds including NYSE, Dave Lauer (Ex Citadel employee, retail ‘advocator’) response shows CTA data feed error  
[https://www.reddit.com/r/Superstonk/comments/141hibz/notahalt\\_halt\\_today\\_are\\_they\\_all\\_working\\_together/](https://www.reddit.com/r/Superstonk/comments/141hibz/notahalt_halt_today_are_they_all_working_together/)



- Another redditor documenting lack of candles 9:51-9:56am  
[https://www.reddit.com/r/Superstonk/comments/141g7ak/active\\_trader\\_pro\\_showing\\_no\\_candles\\_between\\_952/](https://www.reddit.com/r/Superstonk/comments/141g7ak/active_trader_pro_showing_no_candles_between_952/)



- Redditor noticing unusual price difference on bid/ask between brokers TDA & WeBull  
[https://www.reddit.com/r/Superstonk/comments/141f04x/broker\\_prices\\_vastly\\_differnt\\_this\\_morning/](https://www.reddit.com/r/Superstonk/comments/141f04x/broker_prices_vastly_differnt_this_morning/)
- Redditors noticed Negative Volume on price charts on 5/6/23  
<https://www.reddit.com/r/Superstonk/comments/141r9tp/comment/jn1g4c1/?context=1>



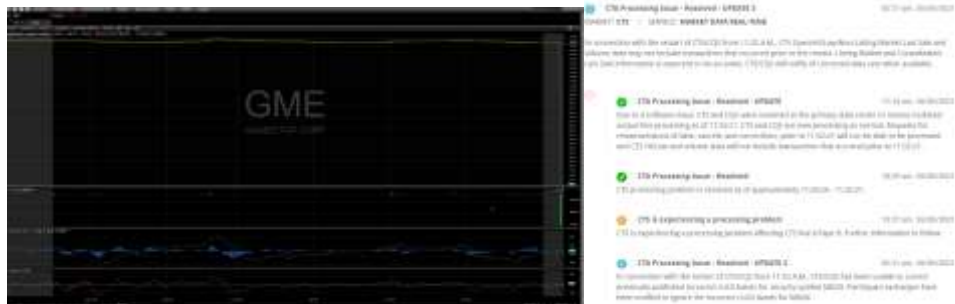
- Similar negative volume on 5/5/21 (over 1 million share volume)  
[https://www.reddit.com/r/Superstonk/comments/141swfr/the\\_exact\\_same\\_thing\\_happened\\_552021\\_glitch\\_from/](https://www.reddit.com/r/Superstonk/comments/141swfr/the_exact_same_thing_happened_552021_glitch_from/)



- Another redditior noticing negative volume over 1million 5/5/21  
[https://www.reddit.com/r/Superstonk/comments/n5sols/can\\_someone\\_explain\\_negative\\_volume\\_asking/](https://www.reddit.com/r/Superstonk/comments/n5sols/can_someone_explain_negative_volume_asking/)



- Post confirming negative volume & relation to CTA data feed error 5/5/21 (1million volume negative)  
[https://www.reddit.com/r/GME/comments/n5pj2g/negative\\_1\\_million\\_on\\_volume\\_after\\_hours\\_wtf/](https://www.reddit.com/r/GME/comments/n5pj2g/negative_1_million_on_volume_after_hours_wtf/) + <https://www.ctaplan.com/alerts#110000353886>



- NYSE 'Glitch' resulting 84 (reported >250) stocks halted in opening hours (24/1/23) – trades were reversed in time period as per NYSE statement



<https://www.wsj.com/livecoverage/stock-market-news-today-01-24-2023/card/dozens-of-nyse-stocks-halted-in-opening-minutes-after-wild-price-swings-3IECoq50qGkKv2X4n6tE>

<https://www.nyse.com/market-status/history#110000531402>

<https://news.yahoo.com/technical-glitch-briefly-halts-trading-153301686.html>

<https://www.reuters.com/markets/us/some-nyse-listed-stocks-briefly-halted-trading-after-market-open-2023-01-24/>

- Video of Interview stating Buys above price bands will be erroneous whereas sells below may not be & not reversed

[https://www.reddit.com/r/Superstonk/comments/10kw9nu/independent\\_fact\\_checker\\_calls\\_bullshit\\_on\\_nyse/](https://www.reddit.com/r/Superstonk/comments/10kw9nu/independent_fact_checker_calls_bullshit_on_nyse/)

- Redditor analysis

[https://www.reddit.com/r/Superstonk/comments/10kifye/an\\_explanation\\_the\\_morning\\_market\\_madness/](https://www.reddit.com/r/Superstonk/comments/10kifye/an_explanation_the_morning_market_madness/)

### HALTING SELLS DURING RUNS VIA TECHNICAL DIFFICULTIES PREVENTING NON-INSTITUTIONAL INVESTORS ACCESSING ONLINE ACCOUNTS

#### MARKET CLOSE AUCTION

- An auction held to determine closing price on NYSE, held daily. Allows institutional investors to guarantee closing price via Market-On-Close Orders or set a restricted bid/ask with Limit on Close Orders.
  - Note – This is not usually offered to retail investors and as such have no reliable method of receiving or impacting the closing price of Stock
  - The closing price is a valuable metric often presented as the key price of the trading day & impacts the opening price the following day.
- NYSE Explanation <https://www.nyse.com/network/article/nyse-closing-auction>

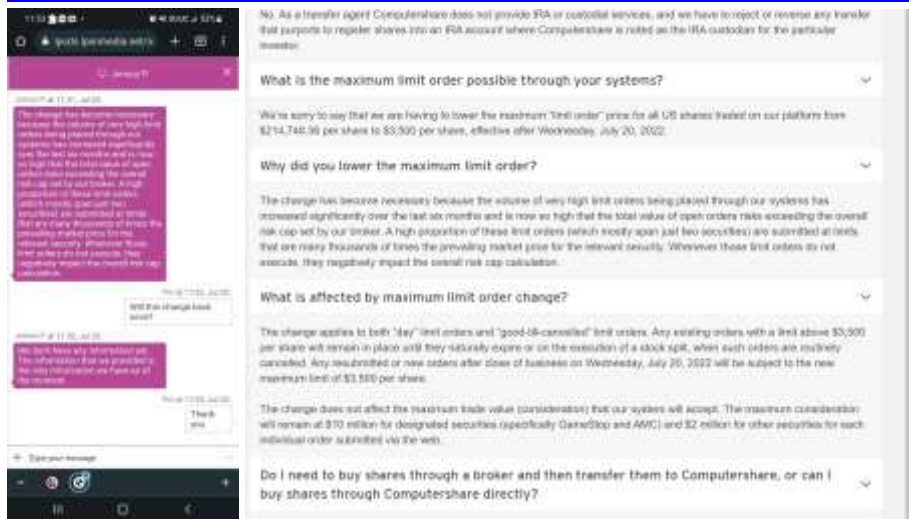
#### ROUND LOT

- A share purchase/sale involving 100 shares or a multiple of 100 shares  
<https://www.investopedia.com/terms/r/roundlot.asp>
- Round lots are integral in determining share price as they determine the Stock Price quotation at the National Market System (NYSE etc) <https://www.sec.gov/files/rules/proposed/2022/34-96494.pdf> (SEC Proposal on adding Odd-Lots)
- Odd lots are share purchases <100 shares and is becoming increasingly frequent orders due to retail investor growth & overall increase in share price. Odd lots currently are not determinant in the Stock price quotation and are only publicly visible in individual proprietary exchange data feeds. There is also less best price calculations for odd-lots.  
<https://www.investopedia.com/terms/o/oddlot.asp> + <https://www.sec.gov/files/rules/proposed/2022/34-96494.pdf>
- Due to overall price of 100 individual shares (especially for higher priced stocks e.g. S&P500 companies), round lot orders are usually driven by institutional investors whereas odd lot orders are more representative of retail investors.
  - As such retail investors orders are less impactful on share price than institutional investors due to lack of funds to participate in large round lot orders

### FORCED MAXIMUM PRICE FOR LIMIT ORDERS FOR RETAIL INVESTORS I.E. COMPUTERSHARE PRICE CAP

- Computershare (GME Transfer agent) forces maximum limit sell price for shares sold through their platform

- Prior to 21/7/21 max limit price per share = \$214,748.36 (Technically limited by Max 32-bit integer - 21474836)
  - From 21/7/21-28/2/23 max limit price per share = \$3500 fixed for all stocks (Confirmed in AMA by Paul Conn Computershare CEO with GME Investors)  
<https://www.youtube.com/watch?v=xFQmiLWiv5Y> + 20/7/21 Archived page of <https://www.computershare.com/us/becoming-a-registered-shareholder-in-us-listed-companies> (<https://archive.md/7fYyH>)
  - From 28/2/23 max limit price per share = 600% current market price & dynamically adjust  
<https://www.computershare.com/us/becoming-a-registered-shareholder-in-us-listed-companies> + [https://www.youtube.com/watch?v=9H\\_pElhdTo](https://www.youtube.com/watch?v=9H_pElhdTo)
- As per Computershare necessary limits as high limit sell orders alter risk cap calculations & exceed cap offered by Computershare's purchasing broker  
<https://www.reddit.com/r/Superstonk/comments/w3ue2n/comment/igyhfz4/?context=3>



## OVERVOTING

- Each Class A common stock & certain preferred stock receive voting rights for the investor to participate in Issuers' voting matters (i.e. Shareholder meetings)
  - Each share is valued at 1 vote. As there is a fixed total amount of stock, there is also a fixed total amount of votes available
- Voting is a crucial mechanism in the Corporate governance of the issuer – it may determine the board of directors who nominate executives, whether shareholder proposals are approved & alter the direction of the company
- Overvoting = When more votes are received than available for issued stock
- As in the US there are 3 predominant forms of stock ownership (beneficial / direct registered / certificated) the voting process may be complicated
  - Direct registered & certificated investors receive & vote directly with the issuer
  - Beneficial ownership investors hold through an intermediary (DTC) – the intermediary passes the voting rights & voting materials from issuer -> broker-dealer -> investor
    - The beneficial owner has 'securities entitlement', not direct ownership of the underlying stock (as per SEC remarks - <https://www.sec.gov/news/speech/2007/spch101607ers.htm>)

Consequently, there are no specific shares directly owned by either the broker participants of DTC or the underlying beneficial owner. As a result, a beneficial owner's ownership cannot be tracked to specific shares but rather its ownership interest is represented as a securities entitlement at his or her broker-dealer. Each of those beneficial owners don't own the actual shares credited to their account but rather they own a bundle of rights defined by federal and state law and by contract with their broker. Consequently, a beneficial owner may not have the "right" to vote the securities credited to his or her account. It depends on what the beneficial owner's contract says. That's news to a lot of people.

- Overvoting can occur when there are more 'securities entitlements' than the 'fungible bulk' of stock
  - via FTD that are not closed or via excessive securities lending leading to the same share being lent-> borrowed & short sold multiple times)
- Trimming votes / Pre-reconciliation – Broker-dealers arrange a Service provider to tabulate votes that assesses if Broker-dealers incoming votes are more than the stock held in the broker-dealers DTC account, prior to sending to the issuer. The Broker-dealer can decide on the method of which excess votes are selected or trimmed – skewing voting towards Broker-Dealers interests. This also ensures that overvoting is not reported to the issuer. Evidence of more securities entitlements than shares issued. <https://www.sec.gov/spotlight/proxyprocess/proxyvotingbrief.htm> + <https://www.sec.gov/news/speech/2007/spch101607ers.htm>

In addition to the distribution of VIFs to their customers, a majority of broker-dealers contract with a service provider to tabulate votes cast by the broker-dealer and by their customers. As votes are submitted, the service provider compares the aggregate number of shares held in the broker-dealer's DTC account plus any other shares the broker-dealer may have (e.g., those held in certificated form or at foreign depositories, etc.) with the number of votes actually cast. If the number of votes cast exceeds this aggregate number of shares, the broker-dealer will instruct the service provider how to reconcile the number of votes to be cast to the number of votes the broker-dealer is entitled to cast. On the day of the meeting, the service provider, in coordination with the broker-dealer, performs a final reconciliation and casts the official vote with the issuer.

In another process, data is reconciled to accommodate an over-vote situation after the broker-dealer's customers have submitted their votes – a process called post-mailing reconciliation. If the broker-dealer votes in excess of its position at DTC, the broker-dealer will reconcile or adjust the number of votes to correspond to its DTC position. The manner in which the adjustment is made varies among firms. Some simply reduce the number of votes cast by the firm's proprietary position. Others use formulas whereby they may allocate only a certain number of votes or a certain percentage of the broker-dealer's overall position to customers with securities purchased on margin. Others use a lottery system.

- Broker Discretionary Votes – If the beneficial owner does not vote, the Broker-Dealer can vote for them in certain 'routine' matters such as uncontested board elections. (NYSE Rule 452) Significant conflict of interest as the Broker-Dealers often have proprietary trading arms that may have position for/against the issuer – gaining voting rights without needing to provide funds and incentivising broker-dealers to reduce investor engagement in voting <https://www.sec.gov/news/speech/2007/spch101607ers.htm> + <https://nyseguide.srorules.com/rules/negg0109013e2c855b2572?searchId=2299557264>

broker-dealers or banks. If the beneficial owner does not vote, under a New York Stock Exchange rule, the securities intermediaries are allowed to vote on certain routine matters. This is commonly called broker discretionary voting. Traditionally, it has been the practice of brokers to vote uninstructed shares on so-called "routine matters" in favor of management, the theory being that if shareholders don't bother to vote on these matters but still own the stock they presumably support management. Broker discretionary voting has been in place for more than 50 years, and one of the major advantages for issuers is that broker discretionary voting help issuers meet quorum requirements when beneficial owners do not vote their shares. Broker-dealers cannot vote for beneficial owners on contested matters and, for the most part, this has not been an issue since it appears that, when there is a contest, shareholders tend to vote so quorum is met.

#### Voting procedure without instructions

A member organization which has transmitted proxy soliciting material to the beneficial owner of stock or to an investment advisor, registered either under the Investment Advisers Act of 1940 or under the laws of a state, who exercises investment discretion pursuant to an advisory contract for the beneficial owner and has been designated in writing by the beneficial owner of such stock (hereinafter "designated investment adviser") to receive soliciting material in lieu of the beneficial owner and solicited voting instructions in accordance with the provisions of Rule 431, and which has not received instructions from the beneficial owner or from the beneficial owner's designated investment adviser by the date specified in the statement accompanying such material, may give or authorize the giving of a proxy to voted such stock, provided the person in the member organization giving or authorizing the giving of the proxy has no knowledge of any contest as to the action to be taken at the meeting and provided such action is adequately disclosed to stockholders and does not include authorization for a merger, consolidation or any other matter which may affect substantially the rights or privileges of such stock.

- When a stock dividend is issued by company, an investor may receive a payment (usually cash) in lieu of issued dividend (stock).
- This is usually indicative of securities lending as the lending terms dictate the broker-dealer may pass along dividends from the borrowing agent to the investor. As different tax implications result from this transaction rather than a simple dividend from issuer to investor, the lending investor receives a payment in lieu of dividend. <https://ibkrampus.com/glossary-terms/payment-in-lieu-of-dividends/> + <https://www.fool.com/knowledge-center/substitute-payment-in-lieu-of-dividends.aspx>
- Tax treatment differs for payment in lieu of dividend. For normal qualified dividends there is a cap of 0-20% taxation based on tax bracket. Payment in lieu dividends are receive no tax discounts and are taxed at ordinary income rates <https://www.fool.com/knowledge-center/substitute-payment-in-lieu-of-dividends.aspx> + <https://www.irs.gov/instructions/i1099b> (under substitute payments)
 

**Substitute payments.** Do not report substitute payments in lieu of dividends and tax-exempt interest on Form 1099-B. Instead, report these payments in box 8 of Form 1099-MISC, Miscellaneous Income. See section 6045(d) and the Instructions for Forms 1099-MISC and 1099-NEC.
- This may also occur if the stock dividend received by the investor consists of partial/fractional shares and is 'automatically' converted to cash in lieu of dividend

#### CONSULTING FIRMS – BCG / CORRUPT BOARD MEMBERS

- Consultancy firms provide incompetent/malicious advice to CEO/Board in conjunction with short positioned parties, leads to active mismanagement of company & often inappropriate burdening of debt ultimately reducing stock price & contributing to bankruptcy of target company
- John Oliver segment on McKinsey <https://www.youtube.com/watch?v=AiOUojVd6xQ>
- Youtuber Consultant investigation & Interviews consultants/reporters [https://www.youtube.com/watch?v=vZE0j\\_WCRvI](https://www.youtube.com/watch?v=vZE0j_WCRvI)
- Detail list of BCG consulted companies & alumni [https://www.reddit.com/r/Superstonk/comments/tnjmwf/bcg\\_research/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=iOSSmf](https://www.reddit.com/r/Superstonk/comments/tnjmwf/bcg_research/?utm_source=share&utm_medium=ios_app&utm_name=iOSSmf)
- Another List of BCG's consulted companies - [https://www.reddit.com/r/Superstonk/comments/u0uemq/can\\_we\\_make\\_a\\_list\\_of\\_the\\_companies\\_that\\_bcg\\_has/](https://www.reddit.com/r/Superstonk/comments/u0uemq/can_we_make_a_list_of_the_companies_that_bcg_has/)
- BCG lawsuit against GameStop for rejected advice, payment based on 'projected profits' rather than actualised profits <https://www.ft.com/content/f77d1ddb-32d3-4e28-ae1e-27f7938f25b0> / <https://www.thestreet.com/memestocks/gme/gamestop-what-you-need-to-know-about-the-bcg-lawsuit/> Ongoing Lawsuit - partially dismissed - [https://www.govinfo.gov/app/details/USCOURTS-ded-1\\_22-cv-00363/context](https://www.govinfo.gov/app/details/USCOURTS-ded-1_22-cv-00363/context)

#### DEATH SPIRAL VIA MALICIOUS LOANS / DEBT WITH PREDETERMINED VALUE RATHER NUMBER OF STOCK

- Laden struggling/small cap companies with malicious loans via convertible bonds/stock that are tied to a cash value rather than number of stock. As the share price decreases the convertible bonds/stock can be converted into more shares that malicious parties use to dilute the total outstanding shares. Increased outstanding shares increases supply -> further decreased share price. Leads to a continuous feedback loop of decr share price -> incr shares available for conversion -> incr conversion -> incr outstanding shares -> decr shar price, ultimately decr share price until bankruptcy. Malicious parties can utilise death spiral financing whilst betting on

downfall (via shorting/short exposure) to profit whilst bankrupting company. Bankruptcy can also be utilised to acquire company assets for cheap.

- Investopedia explanation <https://www.investopedia.com/terms/d/deathspiral.asp>
- Rolling Stones expose on Mitt Romney & Bain Capitals Death spiralling schemes <https://www.rollingstone.com/politics/politics-news/greed-and-debt-the-true-story-of-mitt-romney-and-bain-capital-183291/>
- Lucy Komisar explanation <https://www.youtube.com/watch?v=p1wAzr-7hXI>
- Multiple death spiral events explained by Lucy Komisar <https://www.thekomisarscoop.com/2021/06/how-financial-capture-is-destroying-the-market/>

#### CELLAR-BOXING

- Cellar boxing explanation (OG 2004) <https://archive.is/KSS6m> (Redditors discovering 2021) [https://www.reddit.com/r/Superstonk/comments/pmj9yk/i\\_found\\_the\\_entire\\_naked\\_shorting\\_game\\_plan/](https://www.reddit.com/r/Superstonk/comments/pmj9yk/i_found_the_entire_naked_shorting_game_plan/) (SEC Comment with cellar boxing 2008) <https://www.sec.gov/comments/s7-08-08/s70808-144.htm>

#### SPAC / IPO MANIPULATION VIA BEING UNDERWRITER

- Summary of SPACs/IPO manipulation [https://www.reddit.com/r/Superstonk/comments/13fozis/special\\_purpose\\_acquisition\\_companies\\_money/](https://www.reddit.com/r/Superstonk/comments/13fozis/special_purpose_acquisition_companies_money/)

#### EVIDENCE OF MISCONDUCT:

##### DTCC / BROKERS MISATTRIBUTE INCORRECT SPLIT CODE ON STOCK SPLIT VIA DIVIDEND FOR GME ISSUED 22/7/22 – FC02 (FORWARD SPLIT) INSTEAD OF FC06 (STOCK SPLIT VIA DIVIDEND)

- 4-to-1 Stock split via dividend issued by GME -> Computershare -> distributed as stock dividend to DTCC. DTCC issued as Forward Stock split to brokers leading to multiplication of all shares at brokerage rather than requiring delivery/receiving stock as dividend from transfer agent. Allowed shorted shares to escape forced delivery as shares did not need to be delivered to increase individual accounts reported share 'entitlements'
- (Evid - <https://news.gamestop.com/stock-split>) On 6/7/22, GameStop announced a 4-for-1 stock split in the form of a stock dividend, effective as of 21/7/22, for stockholders of record on 18/7/22. "PLEASE NOTE GAMESTOP HAS ALREADY DISTRIBUTED THE SHARES OF COMMON STOCK REQUIRED FOR THE STOCK DIVIDEND TO ITS TRANSFER AGENT, WHICH HAS CONFIRMED IT SUBSEQUENTLY DISTRIBUTED THE APPROPRIATE NUMBER OF SHARES OF COMMON STOCK TO DTC FOR ALLOCATION TO BROKERAGE FIRMS AND OTHER PARTICIPANTS."
- Evid of GME filed form: <https://news.gamestop.com/static-files/1764b8e4-0e1d-41a6-b502-8c5ab7604dc8>

Security Form FD-302 (Rev. 03-24-2009)

**8937** **Report of Organizational Action Affecting Status of Securities**

1. Name of Reporting Member **Apex** 2. Name of Employer **Apex**

3. Reporting Member's Address **Apex** 4. Employer's Address **Apex**

5. Reporting Member's Title **Apex** 6. Employer's Title **Apex**

7. Reporting Member's Contact Information **Apex** 8. Employer's Contact Information **Apex**

9. Reporting Member's Date of Birth **Apex** 10. Reporting Member's Social Security Number **Apex**

11. Reporting Member's Date of Entry into the Security Industry **Apex** 12. Reporting Member's Date of Termination **Apex**

13. Reporting Member's Date of Last Contact **Apex** 14. Reporting Member's Date of Last Contact **Apex**

15. Reporting Member's Date of Last Contact **Apex** 16. Reporting Member's Date of Last Contact **Apex**

17. Reporting Member's Date of Last Contact **Apex** 18. Reporting Member's Date of Last Contact **Apex**

19. Reporting Member's Date of Last Contact **Apex** 20. Reporting Member's Date of Last Contact **Apex**

21. Reporting Member's Date of Last Contact **Apex** 22. Reporting Member's Date of Last Contact **Apex**

23. Reporting Member's Date of Last Contact **Apex** 24. Reporting Member's Date of Last Contact **Apex**

25. Reporting Member's Date of Last Contact **Apex** 26. Reporting Member's Date of Last Contact **Apex**

27. Reporting Member's Date of Last Contact **Apex** 28. Reporting Member's Date of Last Contact **Apex**

29. Reporting Member's Date of Last Contact **Apex** 30. Reporting Member's Date of Last Contact **Apex**

31. Reporting Member's Date of Last Contact **Apex** 32. Reporting Member's Date of Last Contact **Apex**

33. Reporting Member's Date of Last Contact **Apex** 34. Reporting Member's Date of Last Contact **Apex**

35. Reporting Member's Date of Last Contact **Apex** 36. Reporting Member's Date of Last Contact **Apex**

37. Reporting Member's Date of Last Contact **Apex** 38. Reporting Member's Date of Last Contact **Apex**

39. Reporting Member's Date of Last Contact **Apex** 40. Reporting Member's Date of Last Contact **Apex**

41. Reporting Member's Date of Last Contact **Apex** 42. Reporting Member's Date of Last Contact **Apex**

43. Reporting Member's Date of Last Contact **Apex** 44. Reporting Member's Date of Last Contact **Apex**

45. Reporting Member's Date of Last Contact **Apex** 46. Reporting Member's Date of Last Contact **Apex**

47. Reporting Member's Date of Last Contact **Apex** 48. Reporting Member's Date of Last Contact **Apex**

49. Reporting Member's Date of Last Contact **Apex** 50. Reporting Member's Date of Last Contact **Apex**

51. Reporting Member's Date of Last Contact **Apex** 52. Reporting Member's Date of Last Contact **Apex**

53. Reporting Member's Date of Last Contact **Apex** 54. Reporting Member's Date of Last Contact **Apex**

55. Reporting Member's Date of Last Contact **Apex** 56. Reporting Member's Date of Last Contact **Apex**

57. Reporting Member's Date of Last Contact **Apex** 58. Reporting Member's Date of Last Contact **Apex**

59. Reporting Member's Date of Last Contact **Apex** 60. Reporting Member's Date of Last Contact **Apex**

61. Reporting Member's Date of Last Contact **Apex** 62. Reporting Member's Date of Last Contact **Apex**

63. Reporting Member's Date of Last Contact **Apex** 64. Reporting Member's Date of Last Contact **Apex**

65. Reporting Member's Date of Last Contact **Apex** 66. Reporting Member's Date of Last Contact **Apex**

67. Reporting Member's Date of Last Contact **Apex** 68. Reporting Member's Date of Last Contact **Apex**

69. Reporting Member's Date of Last Contact **Apex** 70. Reporting Member's Date of Last Contact **Apex**

71. Reporting Member's Date of Last Contact **Apex** 72. Reporting Member's Date of Last Contact **Apex**

73. Reporting Member's Date of Last Contact **Apex** 74. Reporting Member's Date of Last Contact **Apex**

75. Reporting Member's Date of Last Contact **Apex** 76. Reporting Member's Date of Last Contact **Apex**

77. Reporting Member's Date of Last Contact **Apex** 78. Reporting Member's Date of Last Contact **Apex**

79. Reporting Member's Date of Last Contact **Apex** 80. Reporting Member's Date of Last Contact **Apex**

81. Reporting Member's Date of Last Contact **Apex** 82. Reporting Member's Date of Last Contact **Apex**

83. Reporting Member's Date of Last Contact **Apex** 84. Reporting Member's Date of Last Contact **Apex**

85. Reporting Member's Date of Last Contact **Apex** 86. Reporting Member's Date of Last Contact **Apex**

87. Reporting Member's Date of Last Contact **Apex** 88. Reporting Member's Date of Last Contact **Apex**

89. Reporting Member's Date of Last Contact **Apex** 90. Reporting Member's Date of Last Contact **Apex**

91. Reporting Member's Date of Last Contact **Apex** 92. Reporting Member's Date of Last Contact **Apex**

93. Reporting Member's Date of Last Contact **Apex** 94. Reporting Member's Date of Last Contact **Apex**

95. Reporting Member's Date of Last Contact **Apex** 96. Reporting Member's Date of Last Contact **Apex**

97. Reporting Member's Date of Last Contact **Apex** 98. Reporting Member's Date of Last Contact **Apex**

99. Reporting Member's Date of Last Contact **Apex** 100. Reporting Member's Date of Last Contact **Apex**

FD-302 (Rev. 03-24-2009)

- o Evid of DTCC issued form to brokers (Apex + WeBull): [https://www.reddit.com/r/Superstonk/comments/wh5tg0/the\\_dtcc\\_filed\\_this\\_form\\_using\\_code\\_fc02\\_which\\_is/](https://www.reddit.com/r/Superstonk/comments/wh5tg0/the_dtcc_filed_this_form_using_code_fc02_which_is/)

Record Detail Page - 132870390

Event Details

Legacy Code Reference	Event	Date	DTCC Reference Number
02	Class A New	2023-07-10	00000000000000000000000000000000

Event Level

- 1. Event Level: **Class A New**
- 2. Event Type: **Class A New**
- 3. Event Status: **Class A New**
- 4. Event Date: **2023-07-10**
- 5. Event Time: **08:00:00**
- 6. Event Location: **Apex**
- 7. Event Description: **Class A New**
- 8. Event Details: **Class A New**
- 9. Event Notes: **Class A New**
- 10. Event Attachments: **Class A New**
- 11. Event History: **Class A New**
- 12. Event Audit: **Class A New**
- 13. Event Security: **Class A New**
- 14. Event Compliance: **Class A New**
- 15. Event Risk: **Class A New**
- 16. Event Performance: **Class A New**
- 17. Event Reporting: **Class A New**
- 18. Event Monitoring: **Class A New**
- 19. Event Alerting: **Class A New**
- 20. Event Archiving: **Class A New**
- 21. Event Retention: **Class A New**
- 22. Event Backup: **Class A New**
- 23. Event Recovery: **Class A New**
- 24. Event Disaster: **Class A New**
- 25. Event Business: **Class A New**
- 26. Event Continuity: **Class A New**
- 27. Event Resilience: **Class A New**
- 28. Event Resilience: **Class A New**
- 29. Event Resilience: **Class A New**
- 30. Event Resilience: **Class A New**
- 31. Event Resilience: **Class A New**
- 32. Event Resilience: **Class A New**
- 33. Event Resilience: **Class A New**
- 34. Event Resilience: **Class A New**
- 35. Event Resilience: **Class A New**
- 36. Event Resilience: **Class A New**
- 37. Event Resilience: **Class A New**
- 38. Event Resilience: **Class A New**
- 39. Event Resilience: **Class A New**
- 40. Event Resilience: **Class A New**
- 41. Event Resilience: **Class A New**
- 42. Event Resilience: **Class A New**
- 43. Event Resilience: **Class A New**
- 44. Event Resilience: **Class A New**
- 45. Event Resilience: **Class A New**
- 46. Event Resilience: **Class A New**
- 47. Event Resilience: **Class A New**
- 48. Event Resilience: **Class A New**
- 49. Event Resilience: **Class A New**
- 50. Event Resilience: **Class A New**

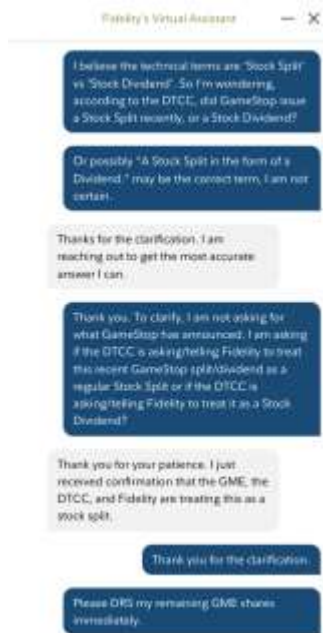
- o [https://www.reddit.com/r/Superstonk/comments/wpymgg/this\\_is\\_the\\_official\\_communication\\_from\\_the\\_dtcc/](https://www.reddit.com/r/Superstonk/comments/wpymgg/this_is_the_official_communication_from_the_dtcc/)
- o Computershare response: <https://twitter.com/Computershare/status/1554590635931361280>



- DTCC Data Dictionary SR 2021 for Function codes FC <https://www.dtcc.com/-/media/Files/Downloads/issues/Corporate-Actions-Transformation/2021/Corporate-Action-Announcements-Data-Dictionary-SR2021.xlsx>
- [https://www.dtcc.com/products/training/helpfiles/asset\\_services/corporate\\_actions/help/codes/function\\_codes.htm](https://www.dtcc.com/products/training/helpfiles/asset_services/corporate_actions/help/codes/function_codes.htm)

Code	Definition
00	STOCK SPLIT
01	FUTURE SPLIT (ISSUE) - UNAVAILABLE
02	FUTURE SPLIT (ISSUE) - PENDING
03	FUTURE SPLIT (ISSUE) - IN CHARGE
04	STOCK SPLIT
05	CASH DIVIDEND (ISSUE)
06	CASH DIVIDEND
07	STOCK DIVIDEND (ISSUE) - UNAVAILABLE
08	STOCK DIVIDEND (ISSUE)
09	STOCK DIVIDEND (ISSUE) - PENDING
10	STOCK DIVIDEND (ISSUE) - IN CHARGE
11	STOCK DIVIDEND (ISSUE)
12	STOCK DIVIDEND (ISSUE) - PENDING
13	STOCK DIVIDEND (ISSUE) - IN CHARGE
14	OPTIONAL DIVIDEND
15	OPTIONAL DIVIDEND - ETCOR
16	OPTIONAL DIVIDEND - CASH AND ETCOR
17	OPTIONAL DIVIDEND - CASH
18	OPTIONAL DIVIDEND - ETCOR
19	OPTIONAL DIVIDEND - FRACTIONS
20	OPTIONAL DIVIDEND - FRACTIONS
21	OPTIONAL DIVIDEND - FRACTIONS
22	MUTUAL BOND

- Broker Evid (Fidelity uses Normal stock split) [https://www.reddit.com/r/Superstonk/comments/wdlhvp/fidelity\\_confirms\\_that\\_they\\_are\\_handling\\_the\\_gme/](https://www.reddit.com/r/Superstonk/comments/wdlhvp/fidelity_confirms_that_they_are_handling_the_gme/)



- Broker Evid (CommSec uses DTCC FC02 code Split) [https://www.reddit.com/r/GMEmate/comments/wp9zah/commsec\\_email\\_reply\\_regards\\_stock\\_split\\_received/](https://www.reddit.com/r/GMEmate/comments/wp9zah/commsec_email_reply_regards_stock_split_received/)



- Broker Evid (TDA uses forward split – stated explicitly) [https://www.reddit.com/r/Superstonk/comments/wmm3du/tda\\_dtcc\\_said\\_process\\_as\\_for\\_ward\\_split/](https://www.reddit.com/r/Superstonk/comments/wmm3du/tda_dtcc_said_process_as_for_ward_split/)





08/11/2022



Re: Your TD Ameritrade Account Ending in [Redacted]

Dear [Redacted]

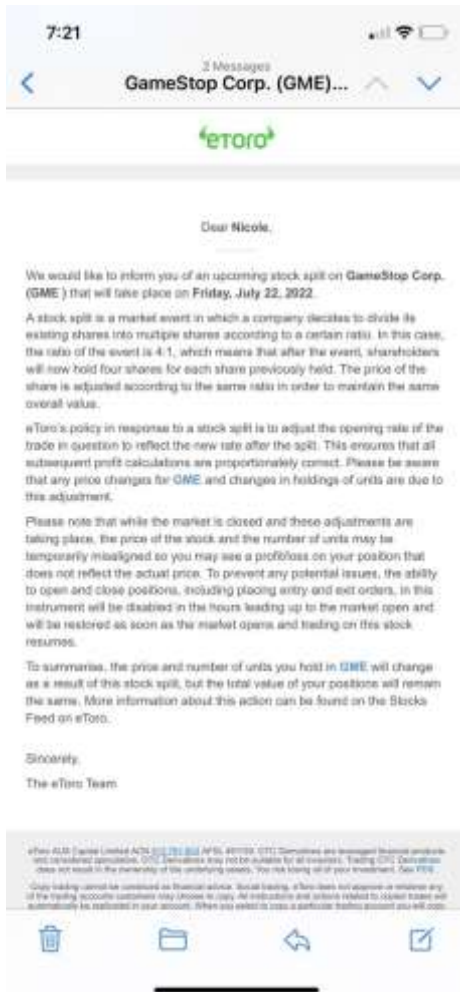
Thank you for allowing me to assist you today. As you requested, this is information regarding the 4:1 GME forward split. GameStop announced that the 4:1 split would be in the form of a stock dividend, but we will process as a 4:1 forward split per instructions given to us by our custodian DTCC.

If we can be of any further assistance, please let us know. Just log in to your account and go to the Message Center to write us. You can also call Client Services at 800-669-3900. We're available 24 hours a day, seven days a week.

Sincerely,

Thea Manternach  
Resource Specialist  
TD Ameritrade

- Broker Evid (eToro – states explicitly multiplying shares)  
[https://www.reddit.com/r/Superstonk/comments/w2g7kr/etoro\\_are\\_going\\_to\\_be\\_doing\\_a\\_stock\\_split\\_not\\_a/](https://www.reddit.com/r/Superstonk/comments/w2g7kr/etoro_are_going_to_be_doing_a_stock_split_not_a/)



- BaFin (German regulator response) –  
[https://www.bafin.de/SharedDocs/Veroeffentlichungen/DE/Meldung/2022/meldung\\_2022\\_08\\_02\\_gamestop.html;jsessionid=6718D126425080BD1AD3C6C26C55F6A3.1\\_cid502](https://www.bafin.de/SharedDocs/Veroeffentlichungen/DE/Meldung/2022/meldung_2022_08_02_gamestop.html;jsessionid=6718D126425080BD1AD3C6C26C55F6A3.1_cid502) +  
[https://twitter.com/BaFin\\_Bund/status/1554435590824902658?t=f1u77-Vf1nr-YmFuo3KVaq&s=19](https://twitter.com/BaFin_Bund/status/1554435590824902658?t=f1u77-Vf1nr-YmFuo3KVaq&s=19) + Second response  
[https://twitter.com/BaFin\\_Bund/status/1556561133514985473?t=4y\\_fonxP6e8zgCX2aOT0AA&s=19](https://twitter.com/BaFin_Bund/status/1556561133514985473?t=4y_fonxP6e8zgCX2aOT0AA&s=19) Note delayed distribution of split shares to international shareholders - German investors received varying timelines and had shares withdrawn after distribution. BaFin ultimately fell back that shares are to be distributed as per originating countries instruction.
  - Response 1: (translated) - refer to tweet
  - Response 2: (translated) For the delivery of the new shares - whether stock split or stock dividend - the actual posting at the respective depository is required. Foreign depositories have confirmed to German custodian banks that the shares from the corporate action have been deposited. Even in the event of a stock split, the depository bank cannot artificially increase the stock. The custodian bank in Germany waits for the posting notification from its depository bank and then posts the shares to the customer securities accounts. BaFin can only supervise the German market and service providers in Germany. BaFin cannot influence business transactions that take place exclusively in the United States. As mentioned in our announcement, b. some custodian banks may require a purely technical derecognition and rebooking of the new shares because a data provider treated the corporate action as a stock dividend for a short period of time and then again as a stock split. The rebooking required for this should be implemented in a few days, but may also take place in steps lasting several days. For specific questions, your bank is the direct contact.

#### **DTC THEORISED TO UTILISE SHARES HELD WITH COMPUTERSHARE VIA DIRECTSTOCK FOR SETTLEMENT**

- Computershare – Transfer agent for GME & majority of US Stock
- Via Computershare – shares can be held via
  - Direct registration (Book) – Held in investors name on Issuer’s ledger
  - Directstock (Plan or Book with DSPP enrolled – Dividend reinvestment or Automatic purchases enabled or contains fractional shares) – Held under Custodian’s name as beneficiary at Computershare with ‘typically’ 10-20% held at DTC
    - Allows for ‘operational efficiency’ when selling shares via Computershare’s broker
    - Paul Conn CEO Computershare <https://www.youtube.com/watch?v=9li-5tgvZKk>
    - Computershare FAQ <https://www.computershare.com/us/becoming-a-registered-shareholder-in-us-listed-companies>
- Theorised shares held at DTC via Directstock utilised in Continuous Net Settlement System (CNS) to fulfill FTD/FTR - Heat Lamp DD <https://fliptml5.com/bookcase/kosyg>
- Over 22 million of 76 million shares owned by GME retail investors held in Plan <https://www.drsgme.org/the-stockholder-list-summary>
- Directstock is automatically enrolled if any of the following is present in Computershare account:
  - Fractional shares
  - Dividend reinvestment plan (DRIP)
  - Automatic purchases (Direct Stock Purchase Plan)
- Directstock terms <https://www-us.computershare.com/Content/Download.asp?docId=%7B029CED19-CE3F-455A-863C-5782C7646AF9%7D&cc=US&lang=en&bhjs=1&theme=cpu>

## CFTC STOP SWAP REPORTING ('TEMPORARY NO ACTION RELIEF') FOR 4 YEARS UNDER 'PAPERWORK REDUCTION' ACT – SUSPICIOUSLY OCCURS IN TIMEFRAME WHEN REDDITORS BEGIN TO INVESTIGATE CFTC/SWAPS

- Redditor requests legally mandated swaps reporting from CFTC via ICE Trade Vault -> Advised by CFTC that due to a change in platform on Nov 2020 swaps are not planned on being released for 2021 -> Redditor requests Swap data via FOIA -> CFTC issues a 'temporary no action relief' letter exempting major swap dealers from reporting swaps -> Continue to issue 'temporary' relief continuously until Dec 2025
- [https://www.reddit.com/r/Superstonk/comments/pfaggb/cftc\\_isnt\\_going\\_to\\_report\\_swaps\\_at\\_all\\_for\\_2021/](https://www.reddit.com/r/Superstonk/comments/pfaggb/cftc_isnt_going_to_report_swaps_at_all_for_2021/)

The Temporary Act and Change to provide an interim integrated global trade repository service platform used for the weekend of November 22, 2020. The change has necessitated changes to the rule used by CFTC to produce the Weekly Swap Report (WSR) and produce publication at this time.

Publication of the WSR is not expected to resume before the end of 2021 and the last report published is 12/28/20.

Thank,

**Robert E. Economid**  
Office of the Chief Economist  
Commodity Futures Trading Commission

Idit T. Alright, so a lot of you suggested I put in a freedom of information Act request on this... Here's what I wrote. The Dodd-Frank Act requires that the CFTC publish a report on trading, clearing, participants, and products in the swaps market on a semi-annual and annual basis per CEA Section 21(a)(4). The CFTC had elected to publish a Swap report on a weekly basis. Currently, in 2021 the CFTC has not published a semi-annual Swap report and their most recent public data reporting was done on 11/26/2020. That data is 8 months old and outside of the range of which Dodd-Frank requires a semi-annual data report. I would like to inquire to receive a copy of the data in any format (text, powerpoint, PDF or any other format).

**Success!**  
Your FOIA request has been created and is being sent to the Commodity Futures Trading Commission.

Please save this page for your records.

[Print page](#)

**Release Number 8746-23**

**CFTC Staff Extends Temporary No-Action Letter Regarding Certain Financial Reporting Requirements for Bank Swap Dealers**

July 11, 2023

Washington, D.C. — The Commodity Futures Trading Commission's Market Participants Division (MPD) today announced it issued a temporary no-action letter extending CFTC Staff Letter No. 21-18 concerning financial reporting obligations for swap dealers (SDs) subject to capital requirements of a prudential regulator (bank SDs) under the CFTC's SD financial reporting rules.

Through [CFTC Staff Letter 23-11](#), MPD is extending a no-action position to bank SDs that report utilizing certain alternative forms, filing deadlines, and/or reporting standards otherwise applicable to them by their prudential or home country regulators, in lieu of complying with the CFTC's financial reporting requirements and subject to certain specified conditions. MPD determined that extending the no-action position temporarily would not adversely impact its ability to monitor the capital position of bank SDs under the Commodity Exchange Act and CFTC regulations.

Today's no-action letter was issued in response to a joint request received from the Securities Industry and Financial Markets Association and the International Swaps and Derivatives Association on behalf of their SD members, who would otherwise be required to comply with the CFTC's financial reporting requirements by October 6. The no-action position taken by MPD will expire on the earlier of October 6, 2025 or the adoption by the CFTC of any revised financial reporting requirements applicable to such bank SDs.

-CFTC-

**Tweet:** NEWS: CFTC staff provides temporary no action relief from certain financial reporting requirements to bank swap dealers. Read more: [go.usa.gov/xM39N](https://go.usa.gov/xM39N)

- Evid CFTC Release Aug 2021 - <https://www.cftc.gov/PressRoom/PressReleases/8422-21>
- Evid CFTC Extends relief on July 2023 until Dec 2025  
<https://www.cftc.gov/PressRoom/PressReleases/8746-23>
- Note – Sources of Swaps data:
  - ICE Trade Vault: <https://www.icetradevault.com/tvus-ticker/#>
  - CME Data Repository: <https://www.cmegroup.com/market-data/repository/data.html#equity>
  - DTCC Data Repository: <https://rtdata.dtcc.com/gtr/tracker.do>

- IHS Markit Securities Lending: <https://ihsmarkit.com/products/securities-finance.html>
- UnaVista London Stock Exchange Historical Data: <https://www.lseg.com/markets-products-and-services/post-trade-services/unavista/unavista-solutions/regulatory-solutions/emir-reporting/trade-repository-public-data/historical-trade-repository-public-data>
- REGIS-TR Data Repository European Union: <https://www.regis-tr.com/regis-tr/public-data/regis-tr-uk-ltd>
- BIS International OTC Database: <https://stats.bis.org/statx/srs/table/d8>
- Original request and reply from CFTC: <https://www.cftc.gov/csl/21-18/download>
- Also the Securities Lending Times: [http://www.securitieslendingtimes.com/interviews/interview.php?interview\\_id=109](http://www.securitieslendingtimes.com/interviews/interview.php?interview_id=109)

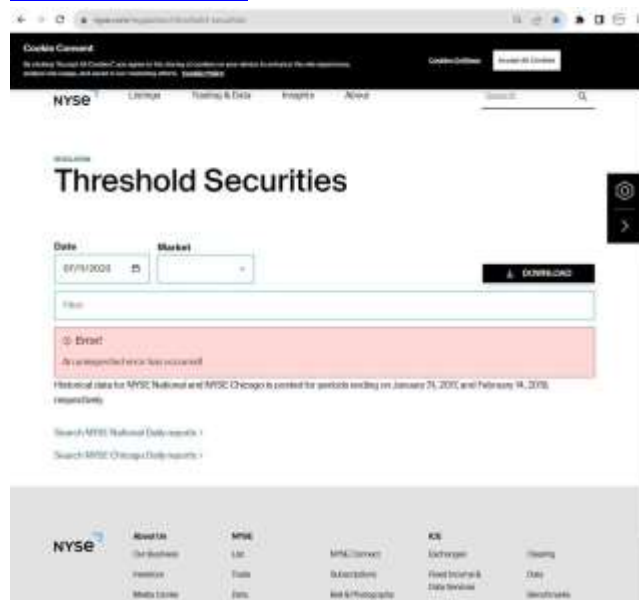
**SEC FTD DATA RELEASED PUBLICLY ON A FORTNIGHTLY BASIS DESPITE RECEIVING DATA DAILY, MULTIPLE ACCIDENTAL EARLY RELEASES BY SEC OR UNNECESSARY FURTHER 2 WEEK DELAY**

- FTD Data as per RegSHO – Released on SEC website fortnightly (end of month for first 2 weeks of month & 15<sup>th</sup> of next month for remaining 2 weeks, repeated throughout year)  
<https://www.sec.gov/data/foiadocsfailsdatahtm>



- Feb 2022 – FTD Data accidentally released 2 weeks early by SEC
  - Early release of Feb 1<sup>st</sup>-14<sup>th</sup> FTD data on SEC Website on Feb 15<sup>th</sup>
  - Note: As released on 15<sup>th</sup> Feb & data includes FTD Data of Feb 14<sup>th</sup>, indicative that FTD Data is received daily
  - Data confirmed to be identical when officially re-released at appropriate time  
[https://twitter.com/chartexchange\\_/status/1498373341375307778](https://twitter.com/chartexchange_/status/1498373341375307778)
  - Note: In absence of any changes between early & official release of FTD Data, shows unnecessary delay for public disclosure on FTD, especially when data available daily
- Redditor analysis of accidental early release of FTD Data by SEC  
[https://www.reddit.com/r/Superstonk/comments/t3s88y/the\\_secs\\_accidental\\_early\\_release\\_of\\_ftd\\_data/](https://www.reddit.com/r/Superstonk/comments/t3s88y/the_secs_accidental_early_release_of_ftd_data/)
- Oct 2023 – Specific FTD Data not reported for >1 month despite FTD Data for following weeks being officially released. Despite later release, certain days missing
  - Oct 1-15<sup>th</sup> Data normally due on 30/10/23 however no public release
  - Oct 15<sup>th</sup>-30<sup>th</sup> Data released on 15/11/23 as scheduled – but Oct 1<sup>st</sup>-15<sup>th</sup> Data still not released. Also missing FTD Data on Oct 18<sup>th</sup>, 19<sup>th</sup> & 24<sup>th</sup>
  - Oct 1<sup>st</sup>-15<sup>th</sup> Data finally released on 21/11/23 (3 weeks later)

- Note – Since 2009 & Over 300 FTD Data releases, SEC has only delayed FTD Data for >14days 5 times total (highly unusual)
- Redditor analysis of Oct 23 FTD
  - [https://www.reddit.com/r/Superstonk/comments/180l6np/ftd\\_data\\_for\\_oct\\_2023\\_first\\_half\\_created\\_today/](https://www.reddit.com/r/Superstonk/comments/180l6np/ftd_data_for_oct_2023_first_half_created_today/)
- Redditor noticing Oct second half release before 1<sup>st</sup> half
  - [https://www.reddit.com/r/Superstonk/comments/17w1x0y/sooo\\_the\\_sec\\_released\\_the\\_ftd\\_data\\_for\\_gme\\_but/](https://www.reddit.com/r/Superstonk/comments/17w1x0y/sooo_the_sec_released_the_ftd_data_for_gme_but/)
- Redditor assessing SEC previous delays since 2009
  - [https://www.reddit.com/r/Superstonk/comments/17w4dxa/ftd\\_data\\_is\\_rarely\\_late\\_meaning\\_the\\_game\\_is\\_afoot/](https://www.reddit.com/r/Superstonk/comments/17w4dxa/ftd_data_is_rarely_late_meaning_the_game_is_afoot/)
- Redditor noticing Threshold List NYSE broken during Oct-Nov timeframe showing “Unexpected error”
  - [https://www.reddit.com/r/Superstonk/comments/17u9qdp/october\\_ftds\\_from\\_sec\\_have\\_been\\_missing\\_13\\_days/](https://www.reddit.com/r/Superstonk/comments/17u9qdp/october_ftds_from_sec_have_been_missing_13_days/) +
  - [https://www.reddit.com/r/Superstonk/comments/17re8hm/ubs\\_is\\_probably\\_lol\\_the\\_bagholder\\_for\\_gme\\_naked/](https://www.reddit.com/r/Superstonk/comments/17re8hm/ubs_is_probably_lol_the_bagholder_for_gme_naked/)



### SEC LOSES COMMENTS WRITTEN BY PUBLIC ONLY IN TIMEFRAME WHERE RETAIL IS INVOLVED (JUNE 2021 – OCT 2022, MAJORITY AUG 2022)

- <https://www.sec.gov/news/press-release/2022-186>
- Notably affected rules involve Security loans, Short Selling, Security swaps, SPAC, MMF, Disclosure by investment advisors

### SUNSHINE ACT FOR REGULATORY MEETINGS (SEC / CFTC) AVERTED BY HOLDING A MAJORITY OF MEETINGS AS CLOSED DOOR MEETINGS USING VAGUE EXCEPTIONS

- Sunshine Act for Federal agencies requires proceedings to be open to the public except in the condition the meeting would:
  - Violate individual rights
  - Hamper enforcement of law
  - Lead to instability of a financial institution

- Intent of the Act is that ‘the public is entitled to the fullest practicable information regarding the decision-making process of the Federal Government’ <https://www.congress.gov/bill/94th-congress/house-bill/11656>
- The SEC/CFTC consistently holds a majority of their meetings as Closed door meetings, citing vague or generic exceptions – often the same exceptions are reused weekly
  - In 2024 alone – 16 Closed door meetings (in 20 weeks) – 7 Open meetings
  - In 2023 – 46 Closed door meetings (in 52 weeks) – 24 Open meetings
  - In 2022 – 48 Closed door meetings (in 52 weeks) – 22 Open meetings
  - In 2021 – 49 Closed door meeting (in 52 weeks) – 17 Open meetings
- Additionally it is not infrequent for Scheduled meetings to be cancelled on the day of
  - Historically this has been a tactic to form meetings off-the-record by gathering all the members before cancelling the ‘official’ meeting
  - Cancellations in 2021 – 21 Cancellations
- Closed meetings cite exceptions to Sunshine act based on vague/generic reasons that are frequently used weekly (appears to be set template)
  - The subject matter of the closed meeting will consist of the following topics:
  - Institution and settlement of injunctive actions;
  - Institution and settlement of administrative proceedings;
  - Resolution of litigation claims; and
  - Other matters relating to examinations and enforcement proceedings.

**Sunshine Act Notice**  
**SECURITIES AND EXCHANGE COMMISSION**  
 Sunshine Act Meetings  
**TIME AND DATE:** 2:00 p.m. on Thursday, May 9, 2024.  
**PLACE:** The meeting will be held via remote access and/or at the Commission's headquarters, 100 F Street, NE, Washington, DC 20540.  
**STATUS:** This meeting will be closed to the public.  
**MATTERS TO BE CONSIDERED:** Commissioners, Counsel to the Commissioners, the Secretary to the Commission, and working agencies will attend the closed meeting. Certain staff members who have an interest in the matters also may be present.  
 In the event that the time, date, or location of this meeting changes, an announcement of the change, along with the new time, date, and/or place of the meeting will be posted on the Commission's website at <https://www.sec.gov>.  
 The General Counsel of the Commission, or her designee, has certified that, in her opinion, one or more of the exemptions set forth in 5 U.S.C. 552(b)(3), 18 U.S.C. 201, 18 U.S.C. 893 and 17 CFR 201.40(a)(3), (a)(5), (a)(6), (a)(7), (a)(8), (a)(9)(i) and (a)(9)(v), permit consideration of the scheduled matters at the closed meeting.  
 The subject matter of the closed meeting will consist of the following topics:  
 • Institution and settlement of injunctive actions  
 • Institution and settlement of administrative proceedings  
 • Resolution of litigation claims; and  
 • Other matters relating to examinations and enforcement proceedings.  
 Notices, changes in Commission practice require adherence to the scheduling of meeting agenda items that may consist of adjudicatory, examination, litigation, or regulatory matters.  
**CONTACT PERSON FOR MORE INFORMATION:** For further information, please contact Vanessa A. Cooneyman from the Office of the Secretary at (202) 991-5400.  
 Authority: 5 U.S.C. 552b.  
 Dated: May 7, 2024.  
 Vanessa A. Cooneyman  
 Secretary

The screenshot shows a digital notice page with a sidebar on the right. The main content area includes sections for 'TIME AND DATE', 'PLACE', 'STATUS', and 'MATTERS TO BE CONSIDERED'. The sidebar menu contains items such as 'Project section', 'Regulatory Case', 'Agencies', 'Dates', 'Document Type', 'Document Status', 'Page', and 'Document Number'. The main text area contains the same information as the text block on the left, including the meeting details and the list of topics to be discussed.



- Closed meetings on Federal register  
<https://www.federalregister.gov/documents/search?conditions%5BAgencies%5D%5B%5D=securities-and-exchange-commission&conditions%5Bterm%5D=sunshine+closed+to+the+public&order=newest&page=1> +  
<https://www.federalregister.gov/documents/search?conditions%5BAgencies%5D%5B%5D=securities-and-exchange-commission&conditions%5Bterm%5D=sunshine+closed+to+the+public&order=newest&page=2> +  
<https://www.federalregister.gov/documents/search?conditions%5BAgencies%5D%5B%5D=securities-and-exchange-commission&conditions%5Bterm%5D=sunshine+closed+to+the+public&order=newest&page=3> +  
<https://www.federalregister.gov/documents/search?conditions%5BAgencies%5D%5B%5D=securities-and-exchange-commission&conditions%5Bterm%5D=sunshine+closed+to+the+public&order=newest&page=4>  
 Etc till pg. 9 for 2021-2023
- Cancellations of Meetings on Federal Register (2021-2024) -  
<https://www.federalregister.gov/documents/search?conditions%5BAgencies%5D%5B%5D=securities-and-exchange-commission&conditions%5Bterm%5D=sunshine+cancel&page=1> +  
<https://www.federalregister.gov/documents/search?conditions%5BAgencies%5D%5B%5D=securities-and-exchange-commission&conditions%5Bterm%5D=sunshine+cancel&page=2>

### SEC AVOIDING FOIA REQUESTS BY DELAYING RESPONSES, SEEKING EXCEPTION (CLAIMING ONGOING INVESTIGATION) AND IF STILL REQUIRED PROVIDES VERY LIMITED HALF-RESPONSES

- Freedom of Information Act (FOIA) allows the public to request for documents from US Federal Agencies including the SEC
- FOIA <https://www.govinfo.gov/content/pkg/USCODE-2022-title5/pdf/USCODE-2022-title5-partI-chap5-subchapII-sec552.pdf>
- SEC FOIA Portal <https://www.foia.gov/agency-search.html?id=bc284e73-f692-4cc1-8fc8-0c8c177088dc&type=component>
- SEC related FOIA Rules - <https://www.ecfr.gov/current/title-17/chapter-II/part-200/subpart-D/section-200.80>
- On average simple FOIA request take 6 business days, complex requests take on average 63 days (2months)

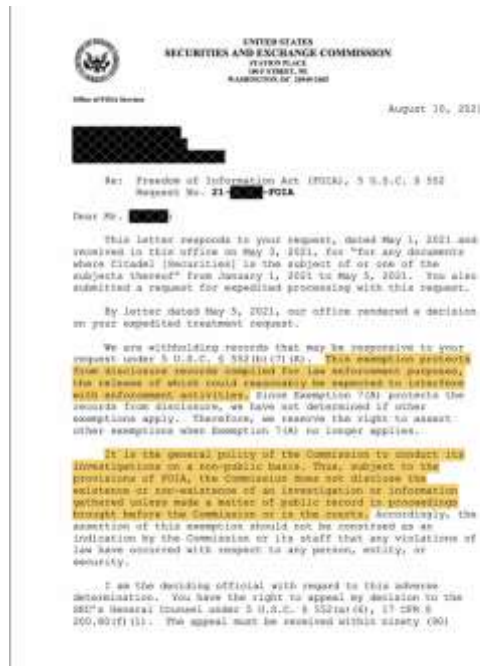
- FOIA request for annual DTC Audit from SEC – Denied after 6 months under exceptions relating to reports for regulation/supervision of Financial institutions (6 months for easily exempted response)

[https://www.reddit.com/r/Superstonk/comments/17zvw8m/foia\\_to\\_the\\_sec\\_for\\_their\\_annual\\_dtc\\_audit\\_was/](https://www.reddit.com/r/Superstonk/comments/17zvw8m/foia_to_the_sec_for_their_annual_dtc_audit_was/)



- FOIA regarding Citadel Securities dated 1/1/21-5/5/21 – Denied after 3 months under exception for investigation relating enforcement matters (Note no regulatory charges against Citadel in the request timeframe 3 years after declining request)

[https://www.reddit.com/r/Superstonk/comments/p200ir/foia\\_request\\_reveals\\_citadel\\_securityes\\_is\\_under/](https://www.reddit.com/r/Superstonk/comments/p200ir/foia_request_reveals_citadel_securityes_is_under/)



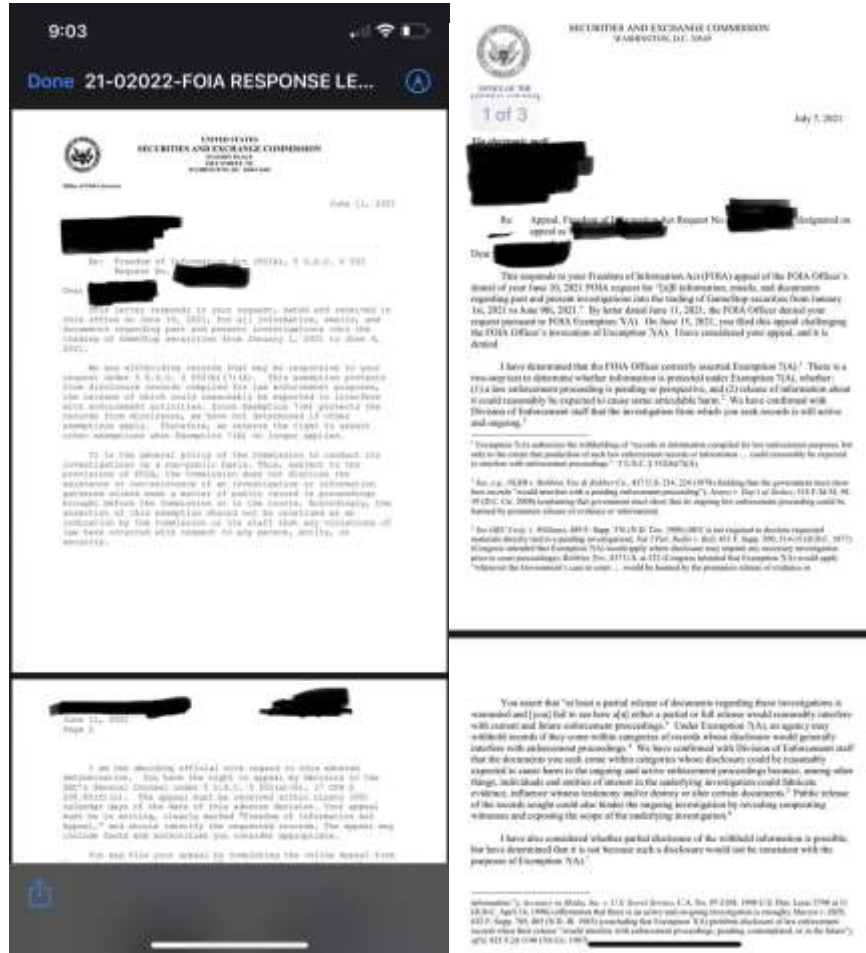


- o Another FOIA requesting records related to GameStop Jan – June 21 – Denied in 1 day citing investigation / enforcement matters (No GameStop specific enforcement in 3 years since request)

[https://www.reddit.com/r/Superstonk/comments/nxuy3/sec\\_reply\\_to\\_foia\\_request\\_regarding\\_gme/](https://www.reddit.com/r/Superstonk/comments/nxuy3/sec_reply_to_foia_request_regarding_gme/)

- o Later declined on appeal citing risks of damaging enforcement

[https://www.reddit.com/r/Superstonk/comments/offfs3/foia\\_appeal\\_update/](https://www.reddit.com/r/Superstonk/comments/offfs3/foia_appeal_update/)



- o GameStop in 2021 & 2022 10Q documented SEC investigation ongoing, ceased documentation in 2023 10Q (suggestive that SEC investigation closed 2023)

[https://www.reddit.com/r/Superstonk/comments/144ewjj/gamestop\\_x\\_sec\\_investigation\\_appears\\_to\\_be/](https://www.reddit.com/r/Superstonk/comments/144ewjj/gamestop_x_sec_investigation_appears_to_be/)



- o FOIA relating to SEC communication with GameStop regarding how Directly registered investors are documented in filings – ‘Approved’ in 2months, but as per SEC’s comment, ‘thorough’ search yielded no results

[https://www.reddit.com/r/Superstonk/comments/1amwoj3/sec\\_foia\\_response\\_any\\_records\\_of\\_communication/](https://www.reddit.com/r/Superstonk/comments/1amwoj3/sec_foia_response_any_records_of_communication/)



- FOIA regarding 2022 Stock split via dividend & broker communication – Approved & provided redacted information - [https://www.reddit.com/r/Superstonk/comments/ybx7wh/the\\_sec\\_responded\\_to\\_my\\_freedom\\_of\\_information/](https://www.reddit.com/r/Superstonk/comments/ybx7wh/the_sec_responded_to_my_freedom_of_information/) + <https://www.docdroid.net/kEXFbBN/22-02639-foia-releasable-records-pdf>
- FOIA regarding FTD Data on GME for Sept 22 – Approved & directed to FTD Data online page however data is still missing for 9/9/22-13/9/22 – SEC claim missing data equivalent to 0 FTDs (106,279 FTD on 8/9/22) [https://www.reddit.com/r/Superstonk/comments/18dgv3i/i\\_got\\_a\\_reply\\_from\\_sec\\_about\\_my\\_foia\\_request\\_for/](https://www.reddit.com/r/Superstonk/comments/18dgv3i/i_got_a_reply_from_sec_about_my_foia_request_for/)



- Evid missing 12/9/22 [https://www.reddit.com/r/Superstonk/comments/17wlx80/everybody\\_talks\\_about\\_the\\_missing\\_ftd\\_data\\_from/](https://www.reddit.com/r/Superstonk/comments/17wlx80/everybody_talks_about_the_missing_ftd_data_from/)

### GameStop Announces Four-for-One Stock Split

July 6, 2022

GAFF:NYSE, Ticker: BUSINESS WIRE | 04/06/2022 - GameStop Corp. (NYSE: GME) ("GameStop" or the "Company") today announced that its Board of Directors has approved and declared a four-for-one split of the Company's Class A common stock in the form of a stock dividend. Company stockholders of record at the close of business on July 14, 2022 will receive a dividend of three additional shares of the Company's Class A common stock for each then-outstanding share of Class A common stock. The actual dividend will be distributed to the participants' accounts on July 15, 2022. Trading will begin on a stock split-adjusted basis on July 21, 2022.



07/21/2022 + T-2 + T+35 = 12/09/2022

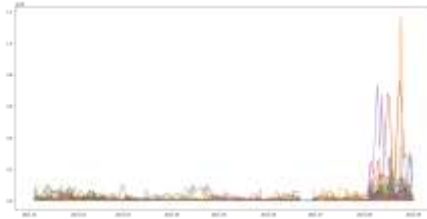
#### GME Falls-to-Deliver

Settlement Date (T+202) <sup>1</sup>	Falls-to-Deliver <sup>2</sup>	Price <sup>3</sup>	Trade Date (T)	Close Out Date (T+15C) <sup>4</sup>	Notional \$	FTD Change
2022-09-16	37,595	28.98	2022-09-16	2022-10-01	1,091,647	3,002
2022-09-16	24,872	29.64	2022-09-16	2022-10-01	743,128	13,128
2022-09-16	19,124	28.01	2022-09-14	2022-10-19	542,424	-20,724
2022-09-16	34,824	28.13	2022-09-16	2022-10-18	1,121,063	-3,087
2022-09-14	48,243	27.80	2022-09-16	2022-10-17	1,339,187	17,013
2022-09-16	106,219	24.04	2022-09-16	2022-10-11	2,554,947	42,083
2022-09-07	43,207	25.14	2022-09-08	2022-10-07	1,093,543	-5,277
2022-09-06	66,624	27.08	2022-09-01	2022-10-06	1,822,005	2,004
2022-09-06	64,528	27.62	2022-09-01	2022-10-04	1,784,049	86,313
2022-09-01	138,913	33.04	2022-09-02	2022-10-04	4,522,148	142,178
2022-09-01	5,735	29.84	2022-09-02	2022-10-03	171,772	-16,171
2022-08-16	17,406	31.58	2022-08-16	2022-09-28	544,038	13,382
2022-08-16	4,514	33.94	2022-08-25	2022-09-29	144,014	-25,715
2022-08-16	38,409	31.98	2022-08-24	2022-09-29	1,211,572	-133,071
2022-08-16	183,888	32.88	2022-08-23	2022-09-27	5,913,188	126,948
2022-08-16	38,682	33.52	2022-08-23	2022-09-28	1,291,918	88,881
2022-08-23	0	34.38	2022-08-19	2022-09-23	0	27,175
2022-08-10	12,176	38.49	2022-08-10	2022-09-22	467,092	4,217
2022-08-18	28,939	37.02	2022-08-17	2022-09-21	1,064,078	-48,075
2022-08-18	68,832	48.32	2022-08-16	2022-09-20	3,333,645	47,283
2022-08-17	22,787	42.19	2022-08-15	2022-09-18	958,002	1,124
2022-08-18	31,069	33.68	2022-08-16	2022-09-18	1,033,089	10,585
2022-08-18	18,918	48.74	2022-08-17	2022-09-18	924,629	22,041

<sup>1</sup> Falls-to-Deliver Date: The first half of a given month is available at the end of the month. The second half of a given month is available at about the 15th of the next month. <sup>2</sup> Falls: Trade date plus two business days. <sup>3</sup> Falls-to-Deliver Date: <sup>4</sup> Falls to deliver on a given day are a CUMULATIVE number of all falls outstanding until that day, plus new falls that occur that day. <sup>5</sup> Closing Price on PREVIOUS Day. Value from FTD file. <sup>6</sup> Example: If a broken dealer has up to 15 calendar days following the trade date to close out the failure to deliver position by purchasing securities of the kind and quantity.

**SEC IMPLEMENTS 'EXPERT MARKETS' FOR OTC STOCKS/PENNY STOCKS EXCLUDING ALL BUT INSTITUTIONAL INVESTORS/ACCREDITED INVESTOR (NOT RETAIL) FROM TRANSACTING SHARES – NOTABLY OCCURRED IN SAME TIMEFRAME OF REDDITORS DISCOVERING CELLAR-BOXING**

- – Companies are excessively shorted + laden with bad debt until forced into bankruptcy, as shorting receives cash upfront when initially established and no taxable event occurs until short closed, allows short side to receive large windfall and maintain open positions indefinitely (margin reduces as prices plummet) leading to no taxation on 'profits'. Often debt structuring involves death spiral financing where nefarious creditors provide loans in exchange for shares calculated by a fixed cash amount, as share price falls, bad actor creditors receive larger portion of shares that they use to further short price. Market makers as per 'Cellar boxing' aim to reach a share price of \$0.01 as spread between 0 & \$0.01 is theoretically infinite leading to significant profits. MM utilise overseas brokers/banks to offshore large naked short positions outside of US jurisdiction. If share prices rise margin for these nefarious actors increases and risk of margin call increases. To counteract MM need to continuously naked short shares to erase any bids and encourage share losses.
- Retail investors were considering purchasing suspected cellar boxed companies i.e. TOYRF / Sears to catch artificially increased stock prices or force closing of short positions as increased price increases margin requirements
- By SEC implementing Expert markets, retail investors were prohibited in engaging with suspected cellar boxed companies and allows nefarious actors to continuously maintain share prices as transactions can only be initiated by institutional/accredited investors
- Evid Redditors noticing correlation with OTC stocks Sept 2021 [https://www.reddit.com/r/Superstonk/comments/ph3bfr/zombies\\_found\\_thousands\\_of\\_otc\\_stocks\\_correlating/](https://www.reddit.com/r/Superstonk/comments/ph3bfr/zombies_found_thousands_of_otc_stocks_correlating/)



- Cellar boxing explanation (OG 2004) <https://archive.is/KSS6m> (Redditors discovering 2021) [https://www.reddit.com/r/Superstonk/comments/pmj9yk/i\\_found\\_the\\_entire\\_naked\\_shorting\\_game\\_plan/](https://www.reddit.com/r/Superstonk/comments/pmj9yk/i_found_the_entire_naked_shorting_game_plan/) (SEC Comment with cellar boxing 2008) <https://www.sec.gov/comments/s7-08-08/s70808-144.htm>
- SEC Rule Proposal (Aug 2021 – Implemented Sept 2021 – unusually fast, within 1mo) <https://www.sec.gov/news/public-statement/proposed-expert-market>



### BANKING RESERVE REQUIREMENTS REDUCED TO 0% FOR COVID & CONTINUED INDEFINITELY

- Reserve requirements – The amount of funds banks hold in reserve to meet liabilities in the event of sudden withdrawals <https://www.investopedia.com/terms/r/requiredreserves.asp>
- i.e. the amount of ‘customers’ deposits (liabilities) the bank must keep on hand in case customers request to withdraw ‘their’ money
- The Federal Reserve reduced Reserve requirements to ZERO percent for ALL depository institutions (ie Banks) in March 2020 & continued for >4years with no indication to cease <https://www.federalreserve.gov/monetarypolicy/reservereq.htm>
- i.e. Banks do not need to keep ANY reserves of ‘customer’s’ deposits as per the Reserve requirements
- Implementation by FED on Mar 2020 - <https://www.federalreserve.gov/newsevents/pressreleases/monetary20200315b.htm>
- FED has switched to ‘Ample Reserves Regime’ that relies on Banks self-monitoring & maintaining reserves based on risk of profit loss from keeping or using reserves in overnight loans <https://www.federalreserve.gov/econres/notes/feds-notes/implementing-monetary-policy-in-an-ample-reserves-regime-the-basics-note-1-of-3-20200701.html>

### FEDERAL RESERVE PRESIDENTS SELLS ALL PERSONAL SHARES AT PEAK CITING ‘ETHIC CONCERNS’ IMMEDIATELY BEFORE SIGNIFICANT PRICE DECLINE IN STOCK MARKET

- Regional Federal Reserve Presidents Robert Kaplan & Eric Rosengren announce on 9/9/21 selling all personal individual stocks prior to 29/9/21 claiming ethics concerns in 2020 trading <https://www.cnbc.com/2021/09/09/feds-rosengren-to-sell-individual-stock-portfolio-to-address-ethics-concerns.html>

- Inflation data showed significant increase from Sept 2021 (0.4% CPI) -> Oct 2021 (6.2% CPI) resulting in announcement of tapering by FED & price decline in majority of stocks / S&P500  
<https://www.bls.gov/opub/ted/2021/consumer-prices-increase-6-2-percent-for-the-year-ended-october-2021.htm> + [https://www.bls.gov/news.release/archives/cpi\\_10132021.pdf](https://www.bls.gov/news.release/archives/cpi_10132021.pdf)
- Robert Kaplan (Dallas FED President) made large >\$1,000,000 investments in same timeframe as acting on FOMC & implementing monetary policies/investments during COVID. Traded whilst announcing National emergency & unemployment would rise to 20%. 'Cleared' by Federal Reserve internal inspector general (conflict of interest)  
<https://www.bloomberg.com/news/articles/2024-01-22/fed-s-watchdog-clears-kaplan-rosengren-in-probe-of-2020-trades> + <https://wallstreetonparade.com/2024/01/robert-kaplan-was-heavily-trading-on-may-1-2020-one-day-after-a-fed-blackout-period-and-the-same-day-he-made-a-shocking-prediction-on-tv/>
- FED Members actively traded during 2020 whilst implementing monetary policies/investments & hid trading activity from congress & public for 5 years. FED lacked any significant supervision of financial activity .<https://www.bloomberg.com/news/articles/2022-08-11/senator-warren-blasts-fed-for-withholding-trading-records>

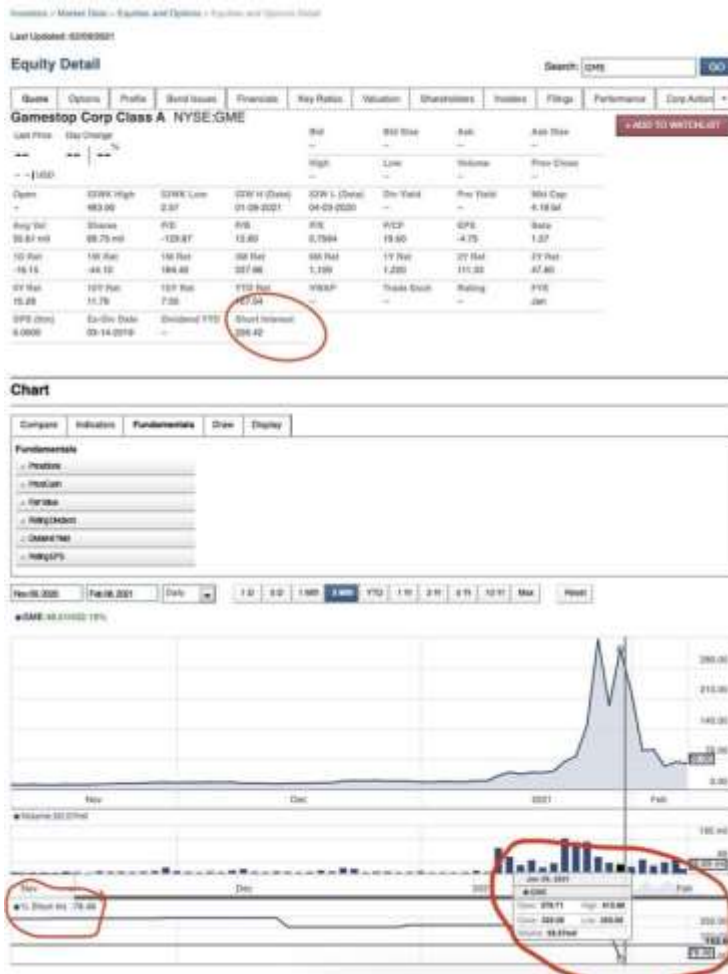
#### SHORT INTEREST EXCEEDED 100% DURING JAN-FEB 2021 (UP TO 313%)

- GameStop in Jan 2021 had Short Interest (Percentage of shorts to total shares outstanding) exceeding 226% (i.e. More shorts existed than the entire number of shares of the stock, by more than a factor of 2! As a share must be borrowed/located for regular short selling & shorts exceeded all shares, highly suggestive of Naked Short selling)  
[https://www.reddit.com/r/Superstonk/comments/108e717/finras\\_website\\_still\\_shows\\_that\\_gme\\_short/](https://www.reddit.com/r/Superstonk/comments/108e717/finras_website_still_shows_that_gme_short/) (Reddit screenshot of FINRA 313% SI)  
[https://www.reddit.com/r/GME/comments/lg5o47/226\\_short\\_interest\\_in\\_gme/?rdt=36050](https://www.reddit.com/r/GME/comments/lg5o47/226_short_interest_in_gme/?rdt=36050) (Reddit screenshot of FINRA 226% SI) + another of FINRA (226%)  
[https://www.reddit.com/r/GME/comments/lgjztf/wtf\\_is\\_going\\_on\\_with\\_finra\\_is\\_it\\_7846\\_or\\_22642/](https://www.reddit.com/r/GME/comments/lgjztf/wtf_is_going_on_with_finra_is_it_7846_or_22642/) + SEC Report GME (109% SI) <https://www.sec.gov/files/staff-report-equity-options-market-struction-conditions-early-2021.pdf> + Class Action Lawsuit against Robinhood (shows 226% SI) <https://www.classaction.org/media/in-re-short-squeeze-trading-antitrust-mdl.pdf> + [https://www.reddit.com/r/Superstonk/comments/o6mp0c/from\\_class\\_action\\_against\\_rh\\_look\\_at\\_that\\_juicy/?utm\\_source=share&utm\\_medium=web2x&context=3](https://www.reddit.com/r/Superstonk/comments/o6mp0c/from_class_action_against_rh_look_at_that_juicy/?utm_source=share&utm_medium=web2x&context=3) (IMAGES BELOW)



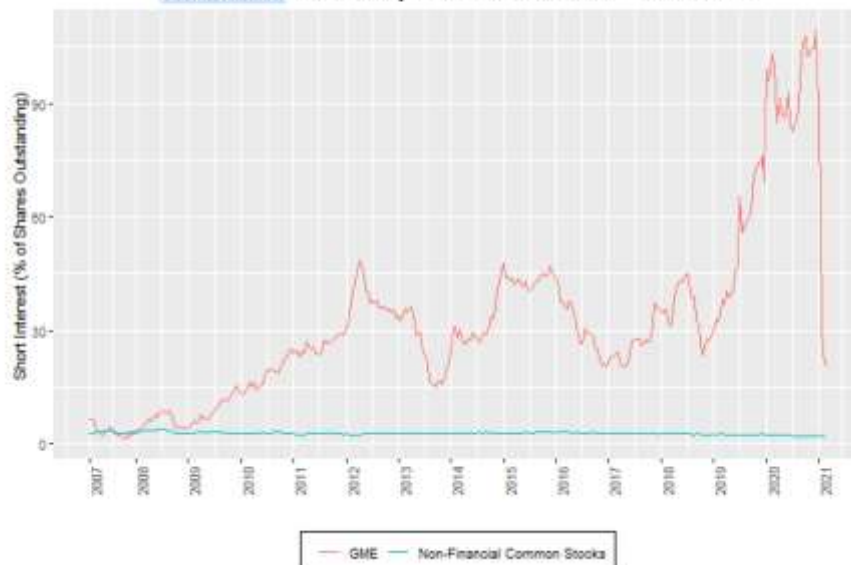
The screenshot shows the desktop version of the FINRA website. The page displays the 'Equity Detail' for Gamestop Corp Class A (NYSE:GME). The page includes a table with various financial metrics and a 'Start Interest' field circled in red.

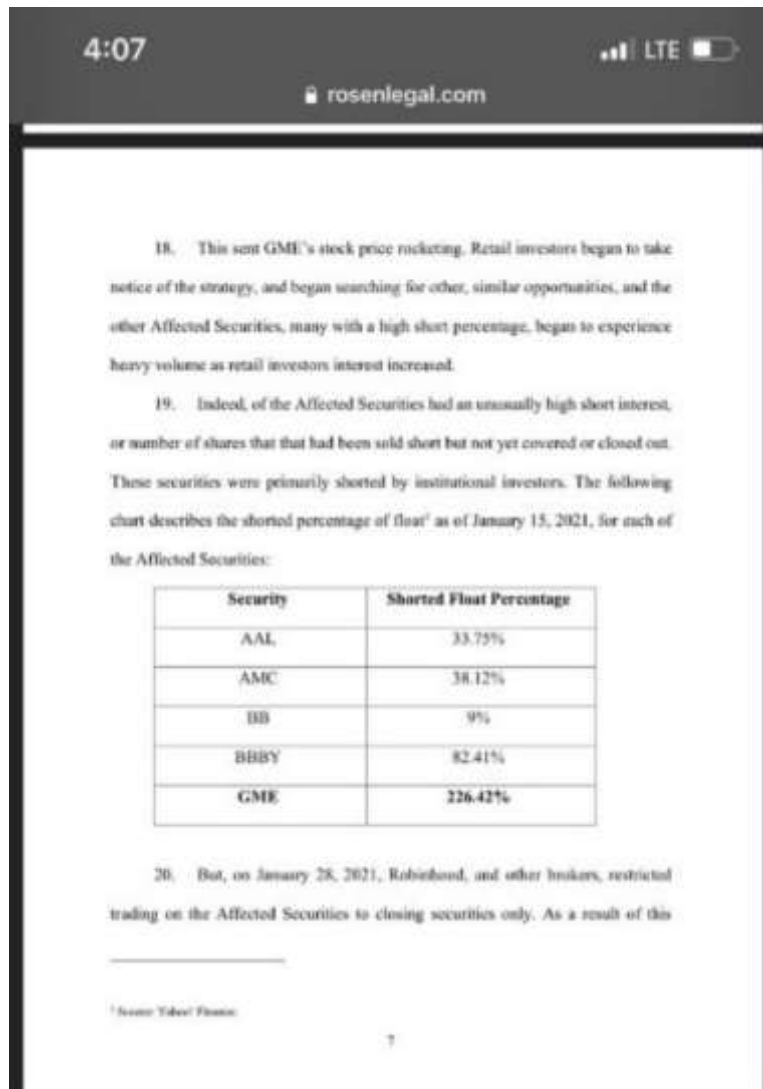
Quote	Options	Profile	Bond Issues	Financials	Key Ratios	Valuation	Shareholders	ESG
<b>Gamestop Corp Class A NYSE:GME</b>								
Last Price	Day Change				Bid	Bid Size	Ask	
53.72	↓6.24   -10.41%				53.55	12	53.73	
					High	Low	Volume	
					\$7.00	\$2.94	3,954,416	
Open	52WK High	52WK Low	52W H (Date)	52W L (Date)	Div Yield	Div Yield	Div Yield	Div Yield
34.41	483.00	2.57	01/28/2021	04/03/2020	-	-	-	-
Avg Vol	Shares	P/E	P/B	P/S	P/CV	EPS	EPS	EPS
70.91 mil	64.75 mil	-124.87	12.80	0.7904	19.60	-4.75	-4.75	-4.75
10 Mar	1M Ret	1M Ret	3M Ret	3M Ret	1Y Ret	2Y Ret	2Y Ret	2Y Ret
5.91	-73.33	239.17	405.99	1,042	1,474	130.65	130.65	130.65
5Y Ret	10Y Ret	15Y Ret	YTD Ret	VWAP	Trade Exec	Rating	Rating	Rating
18.43	13.26	8.35	16.27	53.62	EDGE	-	-	-
EPS (Dil)	Ex Div Date	Dividend YTD	Start Interest					
0.0000	03-14-2019	-	226.42					



Some institutional accounts had significant short interest in GME prior to January 2021.<sup>61</sup> GME short interest (as a percent of float) in January 2021 reached 122.97%, far exceeding other meme stocks like Dillard's, Inc. (symbol: DDS) (77.3%), Bed Bath & Beyond, Inc. (symbol: BBBY) (66.02%), National Beverage Corp. (symbol: FIZZ) (62.59%), Koss Corp. (symbol: KOSS) (0.92%), Naked Brand Group, Ltd. (symbol: NAKD) (7.3%), and AMC Entertainment Holdings Inc. (symbol: AMC) (11.4%).

**Figure 5** Short Interest in GameStop vs. Market, Jan. 2007 – Feb. 2021<sup>77</sup>





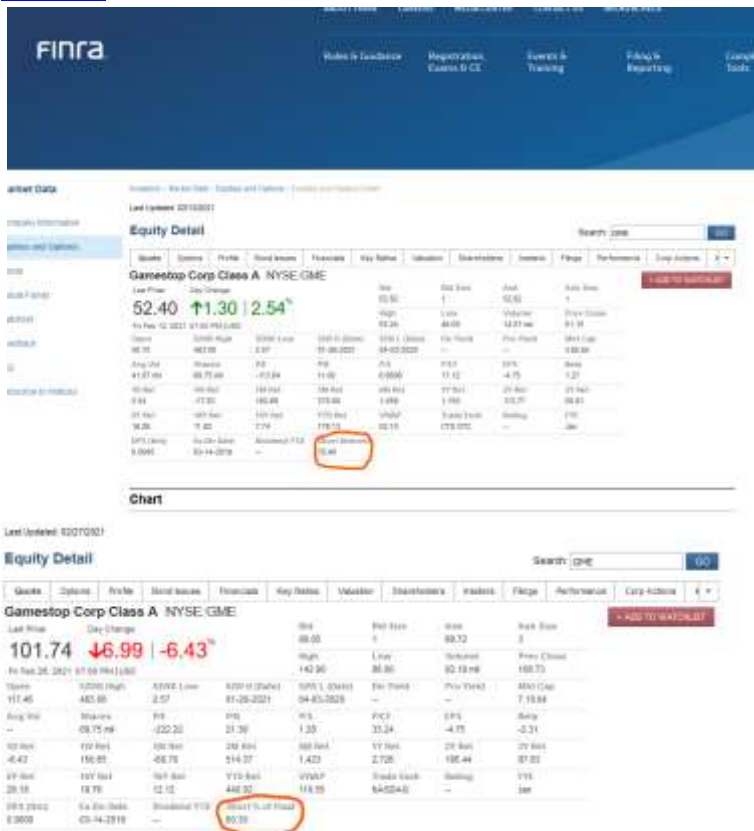
### SHORT INTEREST CALCULATION CHANGED BY S3 PARTNERS & FINRA AFTER GME JAN 2021 EVENT

- After GME Short Interest of >100% (reported up to 226% FINRA) noticed globally (due to Jan 2021 GME event), S3 Partners changed Short Interest calculation prior to Feb 2021 Short interest report to include 'synthetic longs' in addition to total float in denominator (i.e. Short interest can never exceed 100% as added to both numerator & denominator) – explicitly states “can never be above 100%”
- S3 Partners new Short% of Float calculation – move from (total shorts/total outstanding) -> (total shorts/[Total outstanding + synthetic longs]) <https://www.ompnt.com/factor-spotlight-article/introducing-s3-partners-short-interest-data-to-the-omega-point-platform>
- Evidence synthetic longs is equivalent to short positions – as per Ihor (S3 Partners Managing Director) <https://twitter.com/ihors3/status/1380533232039559169> + [https://old.reddit.com/r/Superstonk/comments/mnqygs/ihor\\_just\\_admitted\\_s3\\_short\\_interest\\_is/](https://old.reddit.com/r/Superstonk/comments/mnqygs/ihor_just_admitted_s3_short_interest_is/)





- Redditor showing FINRA changes SI Reporting from Short Interest to Short% of Float (Unknown float used for calculations & mirrors S3 partners short calculation) [https://www.reddit.com/r/GME/comments/lu1fu5/finra\\_changed\\_how\\_they\\_report\\_short\\_interest\\_this/](https://www.reddit.com/r/GME/comments/lu1fu5/finra_changed_how_they_report_short_interest_this/)



- S3 Partners partially owned by Citadel & Virtu (2 largest MMs) (S3 Securities a subsidiary of S3 Partners -> Previously owned by Knight Capital Group -> Segment purchased by Citadel & remainder merged with Virtu) [https://www.reddit.com/r/Superstonk/comments/oqyc3z/citadel\\_and\\_virtu\\_own\\_s3\\_partners\\_msm\\_is\\_owned\\_by/](https://www.reddit.com/r/Superstonk/comments/oqyc3z/citadel_and_virtu_own_s3_partners_msm_is_owned_by/) (Direct evidence in post references)

**DAILY SHARE VOLUME REACHED NEARLY A BILLION SHARES TRADED PER DAY (TOTAL ISSUED SHARES ONLY 65MILLION) IN JAN 2021, CITADEL CLAIMS TO HAVE CLEARED 7.4 BILLION ORDERS ON 27/1/21 ALONE**

- Share Trading Volume – Quantity of shares traded over a specified time <https://www.investopedia.com/terms/v/volume.asp>

- NYSE GME Data - >700,000,000 Shares traded daily on 22/1/21 + 25/1/21 + 26/1/21 – 1.45Billion Shares over week 19-22/1/21 & 2.2Billion Shares traded over week 25-29/1/22  
<https://www.nyse.com/quote/XNYS:GME>

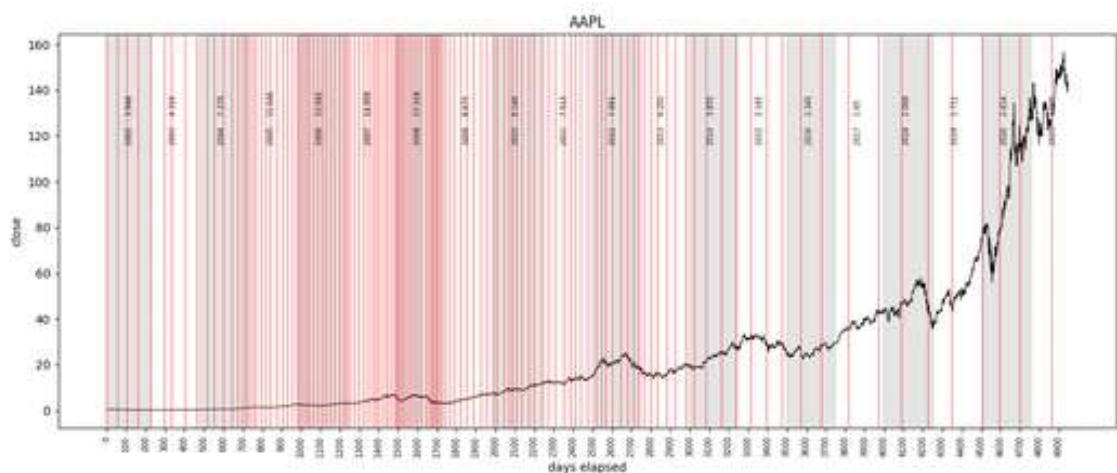
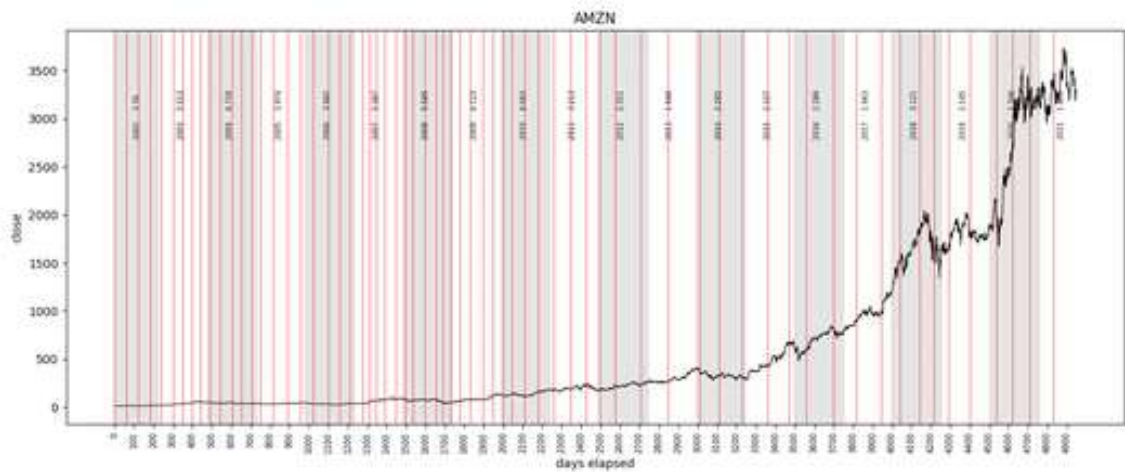
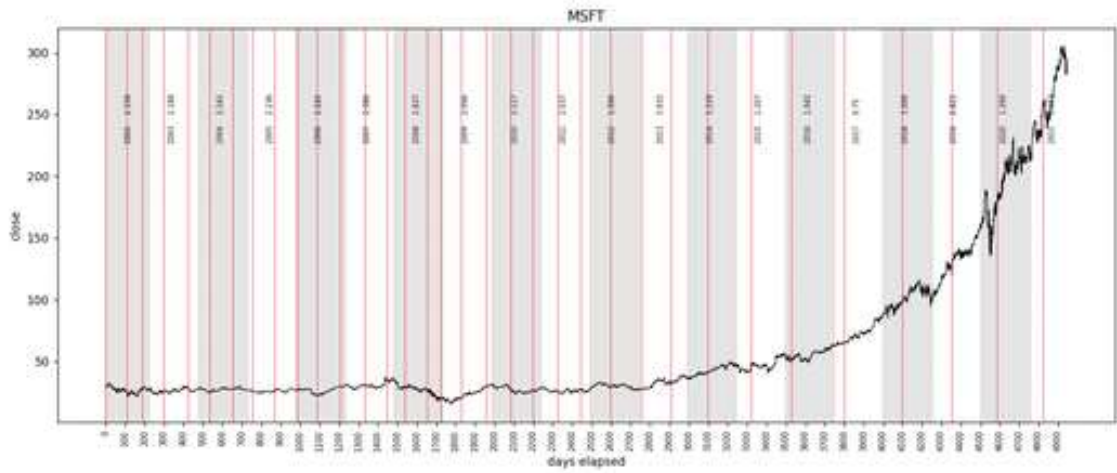
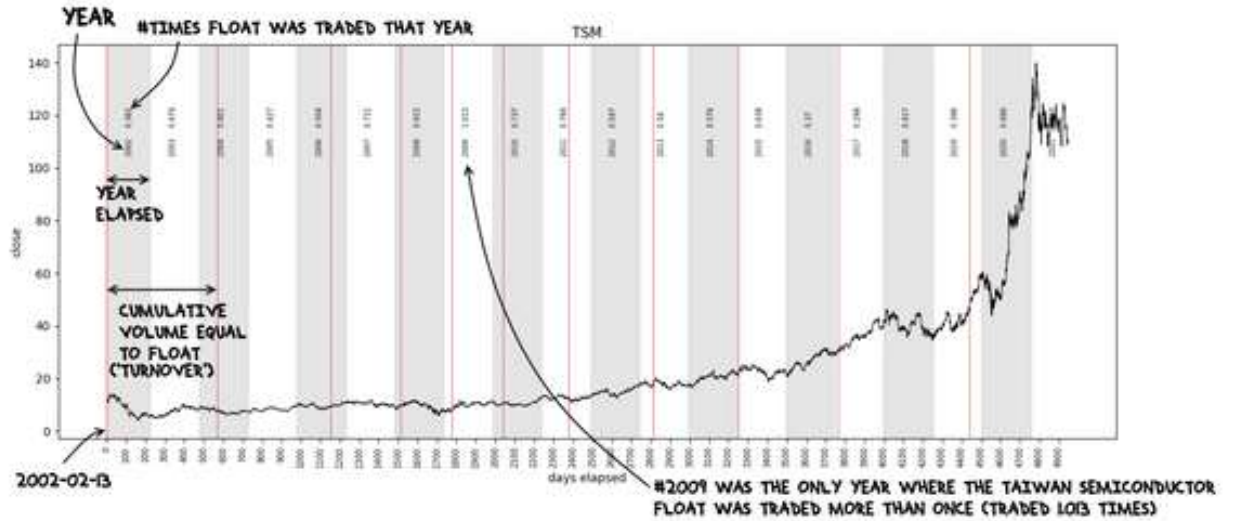
Date	Open	High	Low	Close	Volume
02/01/2021	79.14	80.50	53.00	56.25	149,528,608
01/29/2021	94.9275	103.485	62.50	81.25	202,264,220
01/28/2021	66.25	120.75	28.0625	48.40	235,263,220
01/27/2021	88.7075	95.00	62.25	86.8775	373,586,664
01/26/2021	22.14	37.50	20.05	36.865	714,351,896
01/25/2021	34.1825	39.705	15.2825	19.1975	711,486,000
01/22/2021	10.6475	16.1853	10.58	16.2525	786,631,784
01/21/2021	9.8075	11.1875	9.25	10.7575	228,319,016
01/20/2021	9.3425	10.2975	8.015	9.78	133,887,156
01/19/2021	10.3875	11.98	9.58	9.84	258,887,608

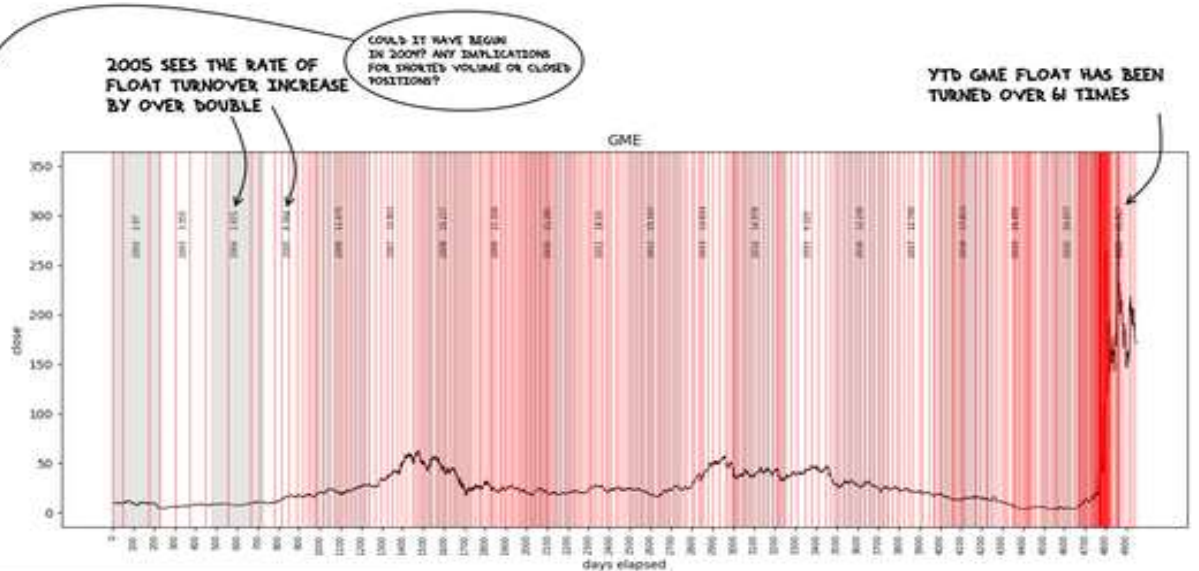
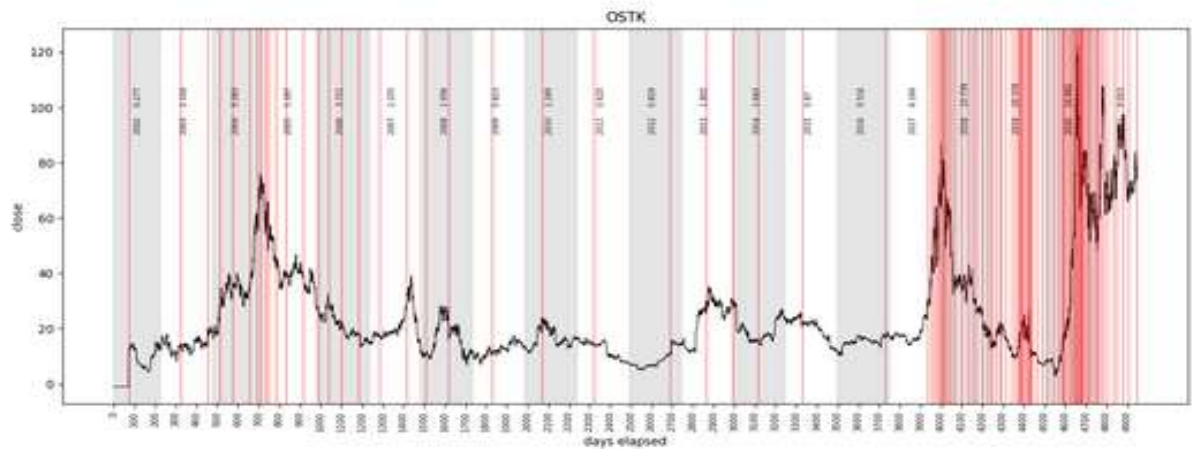
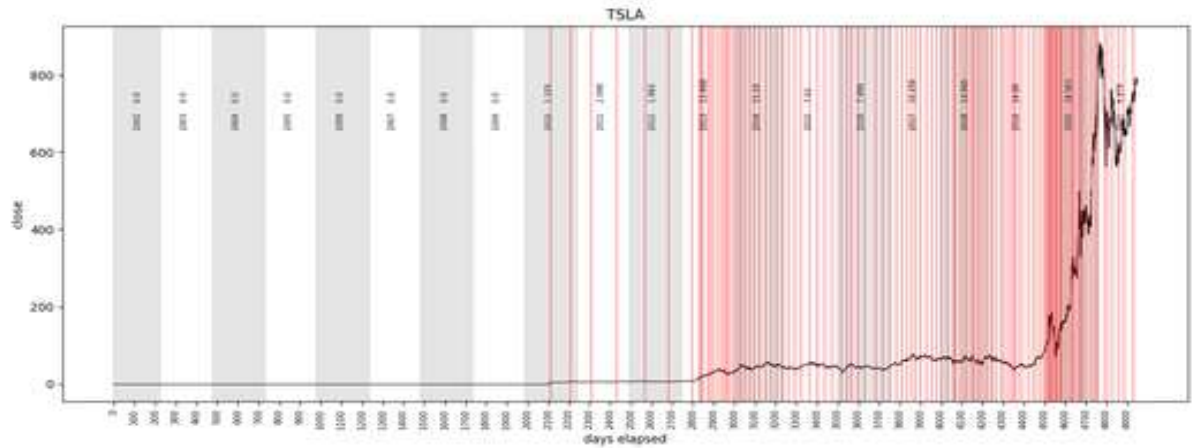
- GameStop in 2021 had a total of 65.3 Million Shares issued & 64.3 Million outstanding  
<https://news.gamestop.com/static-files/55a92a3e-144e-4d2b-8ee6-930db9045593>

Stockholders' equity:

Class A common stock — \$.001 par value; authorized 300.0 shares; 65.3 and 64.3 shares issued and outstanding, respectively	0.1	0.1
Additional paid-in capital	11.0	—
Accumulated other comprehensive loss	(49.3)	(78.8)
Retained earnings	474.9	690.2
<b>Total stockholders' equity</b>	<b>436.7</b>	<b>611.5</b>
<b>Total liabilities and stockholders' equity</b>	<b>\$ 2,472.6</b>	<b>\$ 2,819.7</b>

- Citadel CEO Ken Griffin at House Committee Hearing (18/2/21) claimed Citadel cleared 7.4 billion trades themselves on 27/1/21 – “More shares than the entire avg daily volume of the entire US equities market” <https://www.youtube.com/watch?v=WdO0ErEFu38> + [https://www.youtube.com/watch?v=RfEuNHVPc\\_k](https://www.youtube.com/watch?v=RfEuNHVPc_k)
- Comparison of GameStop to other commonly traded stocks & frequency of share volume exceeding float (each red line represents when the cumulative share volume equals the float) [https://www.reddit.com/r/Superstonk/comments/s7qmeb/gme\\_float\\_turnover\\_compared\\_to\\_msft\\_amzn\\_aapl/](https://www.reddit.com/r/Superstonk/comments/s7qmeb/gme_float_turnover_compared_to_msft_amzn_aapl/) (Partial Image below – Refer to full in link)





mcuban · 50d

17 Awards

Their goal is to never cover their short. But that would take the company going out of business or being delisted. That wont happen here.

Best thing you can do is hold on to the stock and do business with GameStop. If everyone goes to their website and buys from them that is going to help the company which will help the stock which will help everyone here.

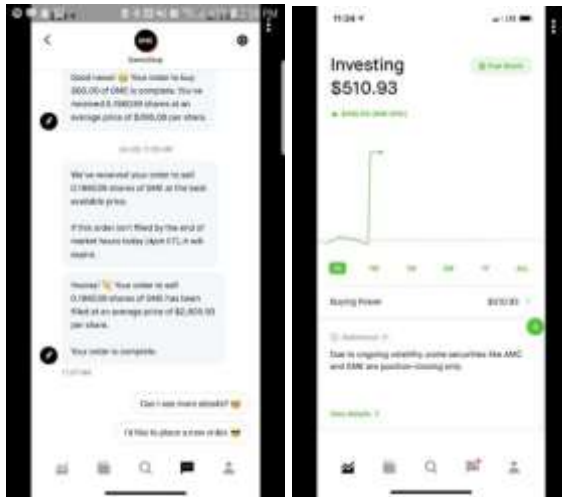
If you still believe in the reason you bought the stock, and that hasnt changed, why sell?

16.0k



**ROBINHOOD ORDER FILLED AT PRICES EXCEEDING DISPLAYED SHARE PRICE ON NMS EXCHANGES - \$2605.05 FOR GME ON 27/1/21**

- Immediately prior to forced PCO (Position Close Only) by Robinhood – customer’s orders filled at prices not reached on lit markets – One user’s price filled at \$2605.05/sh [https://www.reddit.com/r/wallstreetbets/comments/l8tuag/my\\_retarded\\_friend\\_sold\\_his fractional share of/](https://www.reddit.com/r/wallstreetbets/comments/l8tuag/my_retarded_friend_sold_his_fractional_share_of/)



- NYSE GME Data states Intraday High \$95 (\$380 pre-split) on 27/1/21

Date	Open	High	Low	Close	Volume
01/25/2021	94.9275	103.495	62.50	81.25	232,264,220
01/26/2021	66.25	133.75	26.0625	46.40	235,263,220
01/27/2021	88.7075	95.00	62.25	86.8775	373,593,664
01/28/2021	32.14	37.50	20.05	36.095	714,391,666
01/29/2021	24.1825	39.795	15.2825	19.1975	711,496,000
01/22/2021	10.6475	19.1893	10.36	16.2525	788,631,784
01/21/2021	9.8075	11.1675	9.25	10.7575	228,319,010
01/20/2021	9.3425	10.2675	9.015	9.78	133,897,156
01/19/2021	10.3675	11.39	9.16	9.84	298,897,666

**SIGNIFICANT ‘ERRONEOUS’ MARKET DATA SUGGESTIVE OF SIGNIFICANT GME POSITIONS – BRAZIL PUTS / ORTEX SHORT INTEREST & BORROWED SHARES SPIKE / FIDELITY 13.7MILLION SHARES AVAILABLE FOR SHORTING**

- **Brazil Puts**
  - July 28 2021 – On Bloomberg Terminal over 1,000,000 Puts in GME identified, held by 2 Brazil investment firms – representing over 100,000,000 Shares (only 70million shares issued) + 135,858 Puts held by Banco Morgan (JPM Brazilian affiliate)
    - Note – 145,185,600 Shares represented in Puts in this Bloomberg Terminal alone (206% of shares issued, >400% of available float)
  - [https://www.reddit.com/r/Superstonk/comments/otn94a/can\\_anyone\\_explain\\_the\\_over\\_one\\_million\\_put/?utm\\_name=ioussmf](https://www.reddit.com/r/Superstonk/comments/otn94a/can_anyone_explain_the_over_one_million_put/?utm_name=ioussmf) + [https://www.reddit.com/r/Superstonk/comments/otnu92/wtf\\_are\\_these\\_puts\\_financial\\_companies\\_listed\\_in/](https://www.reddit.com/r/Superstonk/comments/otnu92/wtf_are_these_puts_financial_companies_listed_in/)

**GME US Equity**  
 GAMESTOP CORP-CLASS A CUSIP 36467W10  
 Holder Group: All Holders  
 Color Legend: All Holders

Holder Name	Portfolio Name	C/P	Source	Exp Date	Strike	Cont Held	% Out	File Dt
1. CONSTANCIA INVESTIMENTO...	Multiple Portfolios	P	All			720,000	93.731...	03/31/21
2. KAPITALO INVESTIMENOS LT...	Multiple Portfolios					397,900	51.799...	03/31/21
3. SIMPLEX TRADING LLC	SIMPLEX TRADING LLC	P	13F			80,702	10.506...	03/31/21
4. SUSQUEHANNA INTERNATIO...	SUSQUEHANNA INTERNATI...	P	13F			61,511	8.00767	03/31/21
5. JANE STREET GROUP LLC	JANE STREET GROUP LLC	P	13F			35,557	4.62891	03/31/21
6. CITADEL ADVISORS LLC	CITADEL ADVISORS LLC	P	13F			32,714	4.25880	03/31/21
7. GROUP ONE TRADING LP	GROUP ONE TRADING LP	P	13F			25,652	3.33945	03/31/21
8. BTG PACTUAL ASSET MGMT ...	Multiple Portfolios					22,100	2.87704	03/31/21
9. SESSA CAPITAL IM LP	SESSA CAPITAL IM LP	P	13F			18,531	2.41242	03/31/21
10. IMC-CHICAGO LLC	IMC-CHICAGO LLC	P	13F			17,082	2.22378	03/31/21
11. WOLVERINE TRADING, LLC	WOLVERINE TRADING, LLC	P	13F			13,843	1.80212	03/31/21
12. HAP TRADING LLC	HAP TRADING LLC	P	13F			12,797	1.66595	03/31/21
13. PRELUDE CAPITAL MANAGEM...	PRELUDE CAPITAL MANAGEM...	P	13F			12,766	1.66191	03/31/21
14. UBS GROUP AG	UBS GROUP AG	P	13F			7,533	0.98067	03/31/21
15. POMELO CAPITAL LLC	POMELO CAPITAL LLC	P	13F			7,092	0.92326	09/30/18
16. TACONIC CAPITAL ADVISOR...	TACONIC CAPITAL ADVISO...	P	13F			5,379	0.70025	03/31/21
17. CTC LLC	CTC LLC	P	13F			3,462	0.45069	06/30/21
18. HOUND PARTNERS LLC	HOUND PARTNERS LLC	P	13F			2,415	0.31439	03/31/21
19. CMT CAPITAL MARKETS TRA...	CMT CAPITAL MARKETS TR...	P	13F			2,415	0.31439	03/31/21
20. BARCLAYS PLC	BARCLAYS PLC	P	13F			2,405	0.31309	03/31/21

**GME US Equity**  
 GAMESTOP CORP-CLASS A CUSIP 36467W10  
 Holder Group: All Holders  
 Color Legend: All Holders

Holder Name	Portfolio Name	C/P	Source	Exp Date	Strike	Cont Held	% Out	File Dt
1. BANCO JP MORGAN SA/BRA...	Multiple Portfolios	C	All			135,858	17.686...	03/31/21
2. ACE CAPITAL GESTORA DE R...	Multiple Portfolios					55,000	7.16005	06/30/21
3. JANE STREET GROUP LLC	JANE STREET GROUP LLC	C	13F			34,860	4.53817	03/31/21
4. SUSQUEHANNA INTERNATIO...	SUSQUEHANNA INTERNATI...	C	13F			34,544	4.49703	03/31/21
5. CITADEL ADVISORS LLC	CITADEL ADVISORS LLC	C	13F			22,780	2.96556	03/31/21
6. GROUP ONE TRADING LP	GROUP ONE TRADING LP	C	13F			13,891	1.80837	03/31/21
7. SIMPLEX TRADING LLC	SIMPLEX TRADING LLC	C	13F			12,144	1.58094	03/31/21
8. IMC-CHICAGO LLC	IMC-CHICAGO LLC	C	13F			9,728	1.26642	03/31/21
9. WOLVERINE TRADING, LLC	WOLVERINE TRADING, LLC	C	13F			9,665	1.25822	03/31/21
10. CTC LLC	CTC LLC	C	13F			5,651	0.73566	06/30/21
11. HAP TRADING LLC	HAP TRADING LLC	C	13F			4,911	0.63933	03/31/21
12. POMELO CAPITAL LLC	POMELO CAPITAL LLC	C	13F			3,000	0.39055	09/30/18
13. NOMURA HOLDINGS INC	NOMURA HOLDINGS INC	C	13F			2,300	0.29942	03/31/21
14. PEAK6 INVESTMENTS LLC	PEAK6 INVESTMENTS LP	C	13F			1,578	0.20543	03/31/21
15. CUTLER GROUP LP	CUTLER GROUP LP	C	13F			1,211	0.15765	06/30/21
16. PARTNERVEST ADVISORY SE...	PARTNERVEST ADVISORY S...	C	13F			915	0.11912	09/30/20
17. SABAL CAPITAL MANAGEMEN...	SABAL CAPITAL MANAGEME...	C	13F			796	0.10363	09/30/16
18. HOUND PARTNERS LLC	HOUND PARTNERS LLC	C	13F			742	0.09660	03/31/21
19. SPOT TRADING LLC	SPOT TRADING LLC	C	13F			720	0.09373	09/30/17
20. CMT CAPITAL MARKETS TRA...	CMT CAPITAL MARKETS TR...	C	13F			569	0.07407	03/31/21

- The 3 Investment firms are located internationally in Brazil:
  - Constancia Investimentos FIA – 720,000 Puts, Filed 31/3/21  
<https://constanciainvest.com.br/en/funds/constancia-fundamento-fia/> +  
<https://constanciainvest.com.br/en/contact/>
    - Located in Brazil – R. Joaquim Floriano, 100 14th floor - Itaim Bibi (Building [https://www.rfm-com-br.translate.goog/empreendimento/edificio-joaquim-floriano/? x tr sl=pt& x tr tl=en& x tr hl=en& x tr pto=sc](https://www.rfm-com-br.translate.goog/empreendimento/edificio-joaquim-floriano/?x_tr_sl=pt&x_tr_tl=en&x_tr_hl=en&x_tr_pto=sc)) São Paulo | SP | CEP 04534-000
    - Custodian is Banco Bradesco

**Banking information**

Corporate name: CONSTÂNCIA FUNDAMENTO FIA

Fund CNPJ: 11.182.064/0001-77

Bank: 237 – Banco Bradesco

Branch: 2856

Checking account: 29.924-3

- Fund started in Oct 2009

- Assets Under Management - 1507.978m BRL (Approx \$293million USD)  
<https://citywire.com/americas/fund/constancia-fundamento-fia/c321865?periodMonths=24>

- Kapitalo Investimentos – 397,900 Puts, Filed 31/3/21

<https://www.kapitalo.com.br/quem-somos>

- 'Constellation' of Hedgefunds
- Located in Brazil on Itaim Bibi
- Assets under management – 26.5Billion BRL (Approx \$5 Billion USD)



- Redditor regarding Constancia & Kapitalo Info / SEC Report -  
[https://www.reddit.com/r/Superstonk/comments/otqvmh/constancia\\_investimentos\\_ltda\\_kapitalo/](https://www.reddit.com/r/Superstonk/comments/otqvmh/constancia_investimentos_ltda_kapitalo/)
- Banco Morgan – 135,858 Puts, Filed 31/3/21
  - Puts equivalent to 13,585,800 Shares (Float only 25million in 2021)
  - Brazilian affiliate of JP Morgan (Largest bank in US + globally with over \$3.4 trillion AUM) <https://www.jpmorgan.com.br/en/about-us>
- Suspect utilised to offshore short positions – as per FINRA offshore positions are not required to be reported <https://www.finra.org/filing-reporting/regulatory-filing-systems/short-interest/faq>
  - FINRA charges JPM 2020 – Allowed Brazilian affiliate (Banco Morgan) to trade as JPM US, avoiding the need for FINRA approval – allowed to not admit guilt, \$20,000 fine & 'censure'  
[https://www.finra.org/sites/default/files/fda\\_documents/2017053128501%20Morgan%20Stanley%20%26%20Co.%20LLC%20CRD%208209%20AWC%20sl%20%282020-1584749965608%29.pdf](https://www.finra.org/sites/default/files/fda_documents/2017053128501%20Morgan%20Stanley%20%26%20Co.%20LLC%20CRD%208209%20AWC%20sl%20%282020-1584749965608%29.pdf)
- May be utilising 'Enhanced lending' or 'Short arranging products' - Allowing customers to borrow shares from firm's domestic or foreign affiliate to close out short positions <https://www.finra.org/rules-guidance/notices/21-19> + [https://www.reddit.com/r/GME/comments/or91vf/what\\_we\\_do\\_in\\_the\\_shadows\\_part\\_1/](https://www.reddit.com/r/GME/comments/or91vf/what_we_do_in_the_shadows_part_1/) +

**Synthetic Short Positions:** In addition, FINRA is considering requiring firms to reflect synthetic short positions in short interest reports. For example, enhanced short interest reporting could include synthetic short positions achieved through the sale of a call option and purchase of a put option (where the options have the same strike price and expiration month) or through other strategies. FINRA believes this information would assist FINRA in understanding the scope of market participants' short sale activity, specifically regarding the use of less-traditional means of establishing short interest.

**Loan Obligations Resulting From Arranged Financing:** FINRA understands that members may offer arranged financing programs (sometimes called "enhanced lending" or "short arranging products") through which a customer can borrow shares from the firm's domestic or foreign affiliate and use those shares to close out a short position in the customer's account. FINRA is considering requiring members to report as short interest outstanding stock borrows by customers in their arranged financing programs to better reflect actual short sentiment in the stock.

- o Extensive SEC Comment on Enhanced lending & utilisation in offshoring FTDs & short positions - <https://www.sec.gov/comments/s7-11-15/s71115-19.pdf> (pg76 onwards)
- Banco Bradesco has frequently been charged/related to money laundering & tax evasion schemes – e.g. 2019 prosecutors charge for Money laundering scheme <https://www.reuters.com/article/idUSL2N2340E8/> + <https://www.spglobal.com/marketintelligence/en/news-insights/blog/banking-essentials-newsletter-7th-february-edition>
- Bloomberg’s response – “The ownership of the GameStop options by those Brazilian funds was a Bug” "None of those puts should have been displayed as they were not puts on GME." "This issue was isolated to GME." [https://www.reddit.com/r/Superstonk/comments/ozekd5/brazilian\\_puts\\_bloomberg\\_follow\\_up\\_none\\_of\\_those/](https://www.reddit.com/r/Superstonk/comments/ozekd5/brazilian_puts_bloomberg_follow_up_none_of_those/)

██████████

---

From: Ask Help (BLOOMBERG/ NEWSROOM) <askhelp@bloomberg.net>  
 Sent: Wednesday, August 4, 2021 10:19 AM  
 To: ██████████  
 Subject: GME Options (Brazil Funds) Bloomberg

Hi ██████████

Hope you are doing well. This is Grant from the Portfolio Data Team at Bloomberg reaching out regarding your ADSK. The ownership of the Gamestop options by those Brazilian funds was a bug and has been addressed. Options data is normally obtained and posted in Bloomberg on the HDS screen you were looking at via either 13F filings or mutual fund holdings data. 13F filings are going to be coming directly from Edgar while mutual fund holdings data will be sent either directly from the fund company, from a third party provider or scraped from an online source. Options data will be shown until the expiration date of the option. It will shortly thereafter be removed from the Terminal. The reason being is the overall number of options. For example, run [WFLUNDA BE Equity HLD] and select the "Historical View". Search "Call" in the "Security" field and you will see many options with letters of "N.A.". These securities had letters but were removed. At this time, I am going to close your ticket, however, feel free to re-open it using ██████████. Thank you for using the Bloomberg Help Desk and have a great day!

Terminal users can run [HDSK<GO>] to see this and previous inquiries.  
 Reference ██████████ to continue this inquiry.

██████████

Your question was:  
 Re: ██████████

Thank you. We really appreciate Bloomberg's customer service.  
 ██████████

Sent from my iPhone

On Aug 3, 2021, at 10:11 PM, Ask Help (BLOOMBERG/ NEWSROOM) <askhelp@bloomberg.net> wrote:  
 Hi ██████████

Thank you for providing the additional information. We need some more time to review this with our local market rep in US. We will get back to you once we have a resolution. Thank you for your understanding.

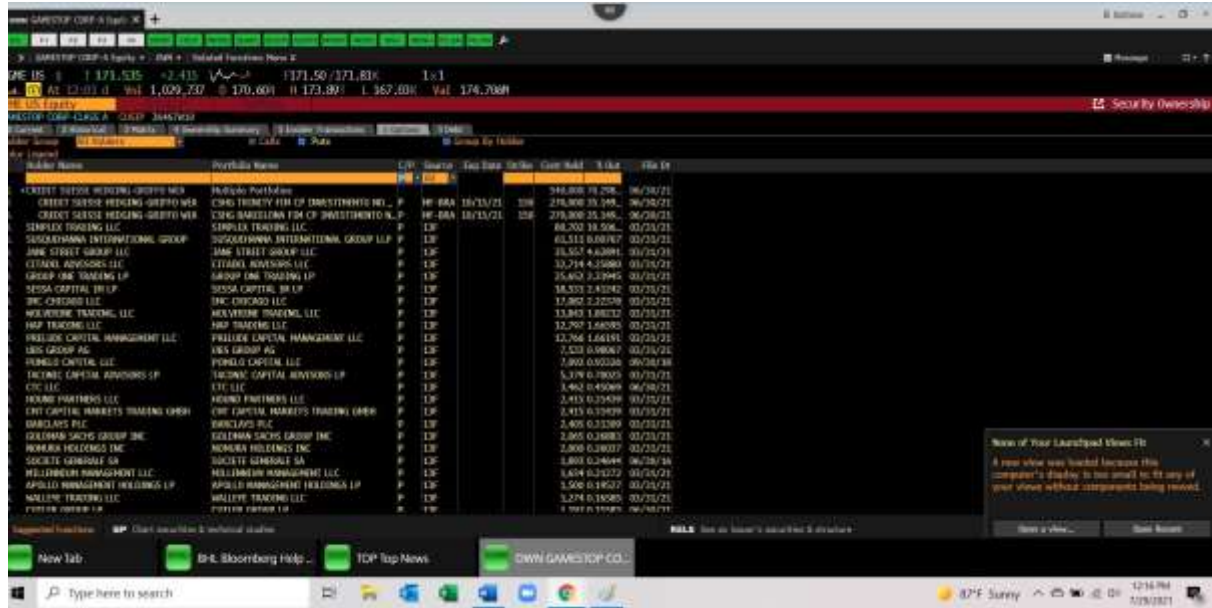
Terminal users can run [HDSK<GO>] to see this and previous inquiries.  
 Reference ██████████ to continue this inquiry.

██████████

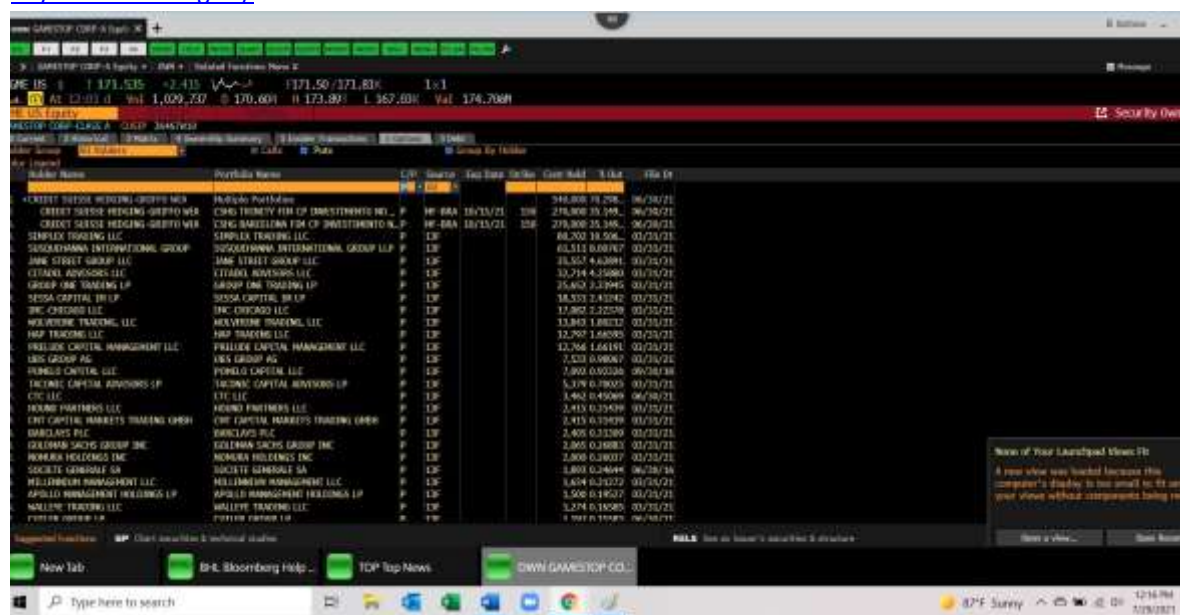
Your question was:







- Puts removed from Bloomberg terminal next day (30/7/21)  
[https://www.reddit.com/r/Superstonk/comments/otxj0x/after\\_my\\_terminal\\_post\\_yesterday\\_i\\_checked\\_again/](https://www.reddit.com/r/Superstonk/comments/otxj0x/after_my_terminal_post_yesterday_i_checked_again/)



- **Credit Suisse Hedging-Griffo** – Brazilian affiliate of Credit Suisse  
<https://www.cshg.com.br/> + <https://www.credit-suisse.com/media/assets/about-us/docs/investor-relations/corporate-and-share-information/corporate-information/acquisitions-and-divestitures/2006-12-21-credit-suisse-to-acquire-majority-interest-in-hedging-griffo-a-leading-brazilian-wealth-manager-en.pdf> + <https://www.reuters.com/article/idUSN1E77L06D20110822/>

  - Largest Brazilian hedfund in 2011 with 9 Billion BRL Assets under management (\$1.75Billion USD)
  - Credit Suisse acquired Archegos positions after collapse March 2021  
<https://www.nytimes.com/2021/07/29/business/credit-suisse-archegos.html> + Archegos <https://www.ft.com/content/bee46da8-6677-4ecd-9e27-9a3760737d9f>
  - Credit Suisse Collapsed and required emergency merger with UBS in March 2023 (2 years later) + Parliamentary Inquiry sealed for 50years regarding cause

<https://www.reuters.com/markets/deals/ubs-agrees-buy-credit-suisse-more-than-2-blm-ft-2023-03-19/> + <https://www.reuters.com/business/finance/credit-suisse-inquiry-will-keep-files-secret-50-years-paper-2023-07-15/>

- Reditor analysis of Credit Suisse Put positions & Brazil exceptions placed in Credit Suisse + Archegos agreement

[https://www.reddit.com/r/Superstonk/comments/17g7r61/so\\_about\\_those\\_2021\\_brazilian\\_credit\\_suisse\\_gme/](https://www.reddit.com/r/Superstonk/comments/17g7r61/so_about_those_2021_brazilian_credit_suisse_gme/)

Case 1:22-cv-05402-JPO Document 41-3 Filed 06/28/22 Page 25 of 31

14. Costs and Expenses

Each party shall bear its own costs and expenses in relation to these Standard Terms and to each Transaction hereunder.

15. Independent Amount

As specified in the Confirmation as a percentage of the Equity Nominal Amount; provided that CS, acting in a commercially reasonable manner, may upon 3 Business Days prior notice to the Counterparty change the Independent Amount with respect to a Transaction to reflect the Independent Amount that CS determines in good faith and in a commercially reasonable manner would be applicable (as determined solely by reference to its internal sources used by it in the regular course of its business) in the Counterparty in respect of such Transaction as of the relevant date of determination if CS and such Counterparty had entered into such Transaction on such date of determination.

16. Brazil Indemnification

In the event that a liability for any tax, levy, impost, duty, charge, assessment or fee of any nature (including interest, penalties and additions thereto) imposed by tax authorities of the **Federative Republic of Brazil ("Taxes")** at any time in respect of any Transaction or in relation to any assets held, purchased, acquired, whether directly or indirectly, actually or synthetically, relating to such Transaction or any connected hedging activity, including any payments made under or in respect of such Transaction or assets, whether or not such Transaction has matured or been terminated and regardless of the date on which such Taxes are imposed, Counterparty agrees that it shall indemnify CS and keep it indemnified against any and all losses, claims, payments and expenses caused by or arising from or in connection with such Taxes suffered or incurred by CS.

The parties agree that the provisions of this sub-clause and the indemnity provided herein shall survive termination of the Transaction until the applicable statute of limitations for recovery of taxes by the relevant tax authorities has run out.

- **JGP Global Brazil Puts** – 41,100 + 3800 Puts against GME (44,900 Puts = 4.49million shares)

- Appear & disappears on Bloomberg terminal within 1 day – Filed 31/5/21, Expiry 18/6/21

<https://www.reddit.com/r/Superstonk/comments/plxc2m/comment/hcekxs3/>

Holder Name	Portfolio Name	C/P	Source	Exp Date	Strike	Cont Held	% Out	File Dt
1. SIMPLEX TRADING LLC	SIMPLEX TRADING LLC	P	13F			80,702	10.550...	03/31/21
2. SUSQUEHANNA INTERNATIO...	SUSQUEHANNA INTERNATI...	P	13F			42,608	5.57029	06/30/21
3. JGP GLOBAL GESTAO DE REC...	JGP STRATEGY MASTER FU...	P	MF-BRA	06/18/21	79.71...	41,100	0.05373	05/31/21
4. CITADEL ADVISORS LLC	CITADEL ADVISORS LLC	P	13F			27,798	3.63413	06/30/21
5. JANE STREET GROUP LLC	JANE STREET GROUP LLC	P	13F			26,559	3.47215	06/30/21
6. GROUP ONE TRADING LP	GROUP ONE TRADING LP	P	13F			20,771	2.71547	06/30/21
7. SESSA CAPITAL IM LP	SESSA CAPITAL IM LP	P	13F			12,688	1.65875	06/30/21
8. IMC-CHICAGO LLC	IMC-CHICAGO LLC	P	13F			12,595	1.64659	06/30/21
9. WOLVERINE TRADING, LLC	WOLVERINE TRADING, LLC	P	13F			12,071	1.57808	06/30/21
10. PRELUDE CAPITAL MANAGEM...	PRELUDE CAPITAL MANAGEM...	P	13F			7,779	1.01698	06/30/21
11. POMELO CAPITAL LLC	POMELO CAPITAL LLC	P	13F			7,092	0.92716	09/30/18
12. HAP TRADING LLC	HAP TRADING LLC	P	13F			6,459	0.84441	06/30/21
13. UBS GROUP AG	UBS GROUP AG	P	13F			4,712	0.61602	06/30/21
14. NOMURA HOLDINGS INC	NOMURA HOLDINGS INC	P	13F			4,300	0.56215	06/30/21
15. SHAY CAPITAL LLC	SHAY CAPITAL LLC	P	13F			4,016	0.52503	03/31/21
16. JGP GLOBAL GESTAO DE REC...	JGP MAX MASTER FIM	P	MF-BRA	06/18/21	79.71...	3,800	0.00497	05/31/21
17. PICTON MAHONEY ASSET MA...	PICTON MAHONEY ASSET M...	P	13F			3,796	0.49626	06/30/21
18. CTC LLC	CTC LLC	P	13F			3,462	0.45260	06/30/21
19. TACONIC CAPITAL ADVISOR...	TACONIC CAPITAL ADVISO...	P	13F			2,500	0.32683	06/30/21
20. HOUND PARTNERS LLC	HOUND PARTNERS LLC	P	13F			2,379	0.31101	06/30/21

- JGP Gestao de Recursos LTDA

- Registered - CNPJ under No. 97.548.167/0001-23
- BNY Mellon is administrator for fund

[https://www.reddit.com/r/Superstonk/comments/pn4cwh/the\\_brazilian\\_company\\_holdi ng\\_millions\\_of\\_puts\\_is/](https://www.reddit.com/r/Superstonk/comments/pn4cwh/the_brazilian_company_holdi ng_millions_of_puts_is/)



- BNY claims on ADV From no foreign entities 0% (Note latest ADV claims 3% [https://www.reddit.com/r/Superstonk/comments/rwt6vi/i\\_found\\_bny\\_mellons\\_adv\\_for\\_m\\_remember\\_all\\_those/](https://www.reddit.com/r/Superstonk/comments/rwt6vi/i_found_bny_mellons_adv_for_m_remember_all_those/) + <https://reports.adviserinfo.sec.gov/reports/ADV/105642/PDF/105642.pdf> )

**Clients**

In your responses to Items 5.C. and 5.D. do not include as "clients" the investors in a private fund you advise, unless you have a separate advisory relationship with those investors.

C. (1) To approximately how many clients for whom you do not have regulatory assets under management did you provide investment advisory services during your most recently completed fiscal year?  
0

(2) Approximately what percentage of your clients are non-United States persons?  
0%

D. For purposes of this Item 5.D., the category "individuals" includes trusts, estates, and 401(k) plans and IRAs of individuals and their family members, but does not include businesses organized as sole proprietorships. The category "business development companies" consists of companies that have made an election pursuant to section 54 of the Investment Company Act of 1940. Unless you provide advisory services pursuant to an investment advisory contract to an investment company registered under the Investment Company Act of 1940, do not answer (i)(1) or (i)(3) below.

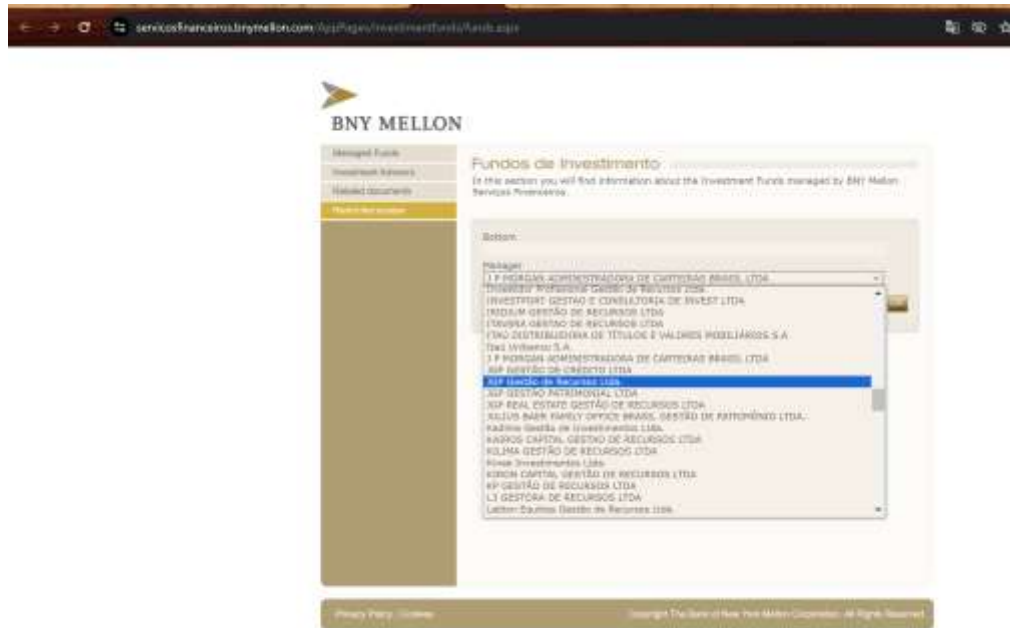
Indicate the approximate number of your clients and amount of your total regulatory assets under management (reported in Item 5.F. below) attributable to each of the following type of client. If you have fewer than 5 clients in a particular category (other than (d), (e), and (f)) you may check Item 5.D.(2) rather than respond to Item 5.D.(1).

The aggregate amount of regulatory assets under management reported in Item 5.D.(3) should equal the total amount of regulatory assets under management reported in Item 5.F.(2)(c) below.

If a client fits into more than one category, select one category that most accurately represents the client to avoid double counting clients and assets. If you advise a registered investment company, business development company, or pooled investment vehicle, report those assets in categories (d), (e), and (f) as applicable.

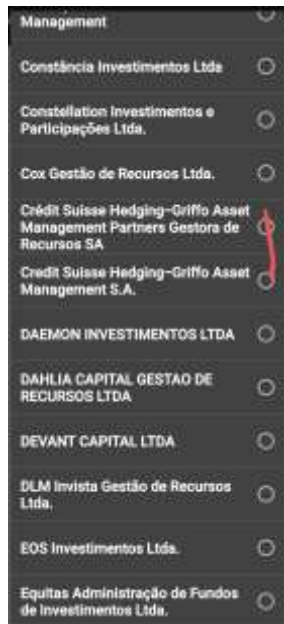
Type of Client	(1) Number of Client(s)	(2) Fewer than 5 Clients	(3) Amount of Regulatory Assets Under Management
(a) Individuals (other than high net worth individuals)	2954	<input type="checkbox"/>	\$ 799,302,173
(b) High net worth individuals	173	<input type="checkbox"/>	\$ 341,322,662
(c) Banking or thrift institutions	0	<input type="checkbox"/>	\$ 0
(d) Investment companies	0	<input type="checkbox"/>	\$ 0
(e) Business development companies	0	<input type="checkbox"/>	\$ 0
(f) Pooled investment vehicles (other than investment companies and business development companies)	0	<input type="checkbox"/>	\$ 0
(g) Pension and profit sharing plans (but not the plan participants or government pension plans)	3	<input type="checkbox"/>	\$ 846,744
(h) Charitable organizations	36	<input type="checkbox"/>	\$ 30,103,005
(i) State or municipal government entities (including government pension plans)	0	<input type="checkbox"/>	\$ 0
(j) Other investment advisors	0	<input type="checkbox"/>	\$ 0
(k) Insurance companies	0	<input type="checkbox"/>	\$ 0
(l) Sovereign wealth funds and foreign official institutions	0	<input type="checkbox"/>	\$ 0
(m) Corporations or other businesses not listed above	541	<input type="checkbox"/>	\$ 318,001,509
(n) Other: MODEL-ONLY WRAP PROGRAM SPONSORS	3	<input type="checkbox"/>	\$ 568,687,818

- BNY has extensive list of associated Brazilian firms – <https://servicosfinanceiros.bnymellon.com/AppPages/investmentfunds/funds.aspx>



- BNY removed funds from listing including above Brazil funds

<https://imgur.com/U1smdwe>

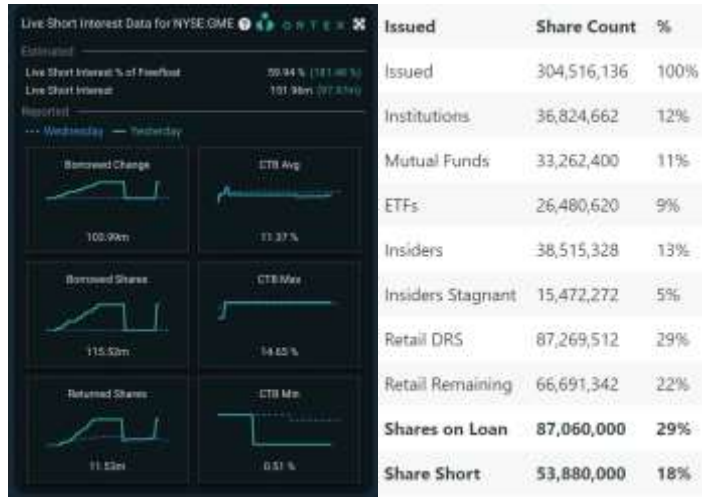


- BNY along with Credit Suisse, some of the largest investors in Archegos <https://www.ft.com/content/2021-10-29/archegos-shock-looks-contained-but-warns-of-slow-moving-contagion>

○ **Ortex Loaned shares / Short interest spike**

- Significant spike in Loaned shares as reported by Ortex on 27/10/22 (87million loaned shares – 305million Shares outstanding)

[https://www.reddit.com/r/Superstonk/comments/ye8wp2/there\\_are\\_now\\_more\\_shares\\_drstd\\_than\\_are\\_on\\_loan/](https://www.reddit.com/r/Superstonk/comments/ye8wp2/there_are_now_more_shares_drstd_than_are_on_loan/)



- Correlated with significant increase in share volume in GME (8 million share volume on 28/10/23, 24 million Share volume on 31/10/23 – prior month average was below 5 million share volume per day)

Date	Open	High	Low	Close	Adj. Close	Volume
Nov 4, 2022	26.60	27.03	25.34	26.51	26.51	4,198,000
Nov 3, 2022	26.00	27.29	26.00	26.28	26.28	3,384,400
Nov 2, 2022	27.00	28.75	26.50	26.62	26.62	4,143,900
Nov 1, 2022	28.40	29.69	27.62	28.39	28.39	5,147,500
Oct 31, 2022	31.22	34.88	37.91	28.31	28.31	24,027,800
Oct 28, 2022	29.88	28.75	28.42	28.17	28.17	8,089,600
Oct 27, 2022	29.75	28.33	28.20	28.93	28.93	3,422,900
Oct 26, 2022	28.37	27.48	25.32	25.42	25.42	3,898,200
Oct 25, 2022	34.82	27.79	24.80	28.87	28.87	7,791,600
Oct 24, 2022	25.00	25.19	24.11	24.71	24.71	3,114,300
Oct 21, 2022	24.15	25.33	24.10	25.30	25.30	3,036,300
Oct 20, 2022	24.85	25.48	24.07	24.41	24.41	5,148,600
Oct 19, 2022	26.00	26.18	24.27	24.54	24.54	5,318,400
Oct 18, 2022	27.10	27.74	26.13	26.67	26.67	4,402,600

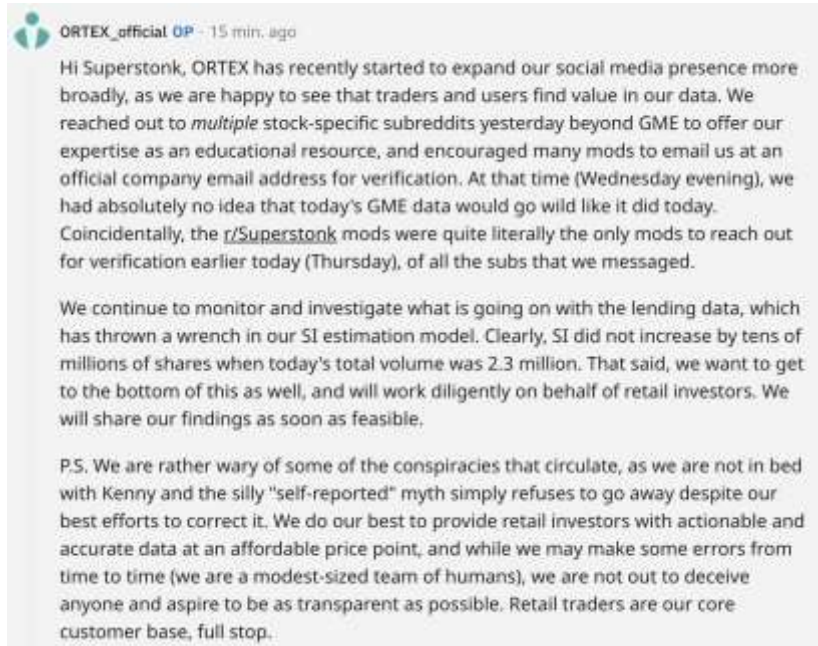
- Ortex joins social media (reddit) earlier the same day prior to Loaned shares/Short interest data release, receives special exemptions from moderators to join subreddit & attempts to explain / minimise Loaned shares/Short interest data
  - [https://www.reddit.com/r/Superstonk/comments/yf1ebo/ortex\\_is\\_investigating\\_todays\\_gme\\_data/](https://www.reddit.com/r/Superstonk/comments/yf1ebo/ortex_is_investigating_todays_gme_data/) +
  - [https://www.reddit.com/r/GME/comments/yf3o5k/smoking\\_gun\\_ortex\\_asked\\_supersub\\_mods\\_for\\_posting/](https://www.reddit.com/r/GME/comments/yf3o5k/smoking_gun_ortex_asked_supersub_mods_for_posting/)
    - States – “We are aware that ORTEX is displaying a massive spike in GameStop (GME) short interest that is related to an extremely large increase in Borrowed Shares. We are currently investigating and will provide additional information soon. It is likely that a huge amount of stock is being borrowed for reasons unrelated to short selling”
      - When asked by redditors to explain reasons for borrowing unrelated to short selling or FTDs, provided this webpage <https://public.ortex.com/understanding-the-mechanics-and-metrics-of-short-selling/>

### Are there other reasons to borrow stock?

Beyond short selling, there are several reasons why investors seek to borrow stock. The most prominent reasons are:

- **Settlement certainty:** When an investor borrows a share to avoid a failed delivery of a separate trade.
- **Market-making:** When a broker lends a client's sell list and borrows the buy list, netting out positions over time to avoid impacting the market.
- **Collateral:** Using borrowed securities such as stocks or bonds as collateral for another trade, such as a swap or other derivatives transaction.
- **Dividend arbitrage:** Lending out a stock to a domestic investor over the dividend record date to avoid foreign investor withholding taxes.

- Note – Practically all relating to short position –
  - Settlement certainty is for covering FTD (ie Naked Shorting)
  - Market making (for covering legally permitted to naked short)
  - Collateral for Swaps (For synthetic short positions as explained in Swaps section)
  - Dividend arbitrage to avoid taxes for foreign investors
- 28/10/22 – Ortex further comment regarding unusual coincidence of joining on the day immediately prior to SI data release  
<https://twitter.com/ORTEX/status/1585859918938009600> +  
<https://www.shacknews.com/article/132885/ortex-statement-gme-short-interest>



- Note - claims 'myth' of self reporting short interest data (refer to lack of short reporting requirements section & numerous mismarking shorts FINRA violations)
- 9/11/22 Ortex states Short interest was an 'underlying systems issue' where the data provider was 'incorrectly merging borrowing & lending data'  
<https://twitter.com/ORTEX/status/1587849591113719809>

## An Update Regarding Intraday Lending and Short Interest Data From October

Last week, ORTEX became aware of anomalous intraday lending data that was being displayed on our platform. In response, we opened an investigation that is being conducted in collaboration with our third-party data partners. We would like to share some preliminary findings.

The pattern that we observed for impacted stocks was Borrowed Shares and/or Returned Shares increasing in large increments at intermittent intervals throughout a given day, only to abruptly decline at a precise time later in the evening. While the scale of the issue varied by ticker, each stock demonstrated a similar pattern. We have not been able to identify any correlations or relationships between the impacted stocks. There have also been a small number of non-U.S. stocks that were impacted.

As we continued to dig into the data, we uncovered additional stocks that exhibited the pattern throughout the month of October. As a result, we have expanded the scope of our investigation to cover a larger number of securities over a broader time frame. This is why the review is taking longer than we initially anticipated.

While some of the impacted stocks command higher levels of attention than others (such as GME), the issue is not widespread in the context of our database that tracks tens of thousands of stocks all over the world every single day. Some stocks experienced the issue on multiple days (the maximum number of impacted days that we have uncovered is 3), while others were only affected for a single day.

On days where a stock was impacted, we do not believe that the intraday lending data was reliable or accurate. Since intraday lending data is one of many inputs in our short interest estimation model, the significant increases in Borrowed Shares caused large increases in short interest estimates that were not supported by market conditions or trading activity for those specific days.

The impacted stocks that we have identified thus far are: BBD, BKR, CCL, CFG, CS, FRBK, GME, GPS, HBAN, ISRG, KMI, LCID, LVS, ME, MULN, NIO, NKLA, OPEN, PCG, RLX, SBH, SLB, SMFR, TAL, UBER, UMC, VRM. Please note that this is a preliminary list, as our investigation remains ongoing.

We have shared our findings with our data partners, who have performed their own reviews and identified an underlying system issue. One of the data providers was incorrectly merging Borrowing and Lending data, which resulted in inaccurate intraday lending data. Our partners are working to address the underlying cause, which will require extensive testing and validation on their end to ensure that the problem is eliminated accurately.

Our data partners are planning to implement the fix this weekend following testing and validation. Until then, ORTEX will continue to review and monitor for issuers that may exhibit this incorrect data pattern.

## Distinguishing between intraday and consolidated daily data

While we continue to work on addressing the underlying issue around the data that is being provided to ORTEX, other technical details around our data may add additional context.

Our securities lending data includes both intraday and consolidated data. Intraday data, which includes various metrics such as Borrowed Shares, Returned Shares, and Cost to Borrow pertains to stock loans that are being requested and negotiated throughout the day. Occasionally, the borrower may book a loan but subsequently change their mind and not complete the loan transaction, which results in that loan being cancelled and closed unfulfilled. If this occurs, the data point is removed from the intraday data altogether. This is why intraday data is inherently more volatile, as market participants are dynamically making decisions that are subject to change based on market conditions.

Once the dust settles, all of the lending data is then reconciled and consolidated. Any loan that is not completed will be excluded from the consolidated data. In other words, the Shares On Loan figure represents stock loan positions that are confirmed to have been completed. As a reminder, our platform covers 85% of securities lenders at the wholesale level. The consolidated daily data was *not* impacted by the data issue in question.

Intraday data provides a real-time view into the lending market, even if some data points are subsequently cancelled. Consolidated On Loan data offers a balance between timeliness and accuracy, compared to the official exchange reported short interest information, since it only includes confirmed loans and is available well before exchange reporting dates. The prompt availability of this data has been crucial to traders in identifying short squeeze opportunities in certain cases, such as the GME and AMC episodes from 2021.

ORTEX provides investors with both intraday and consolidated data to empower users with all available data points in order to make informed decisions, but it is helpful to recognize the context and limitations of each different perspective.

Additionally, ORTEX is currently working on adding a consolidated view of daily short-sale volumes – including exchange data and off-exchange data – to our platform, offering even more insight into what the bears are up to. This dataset has its own nuances and limitations, but stay tuned for more.

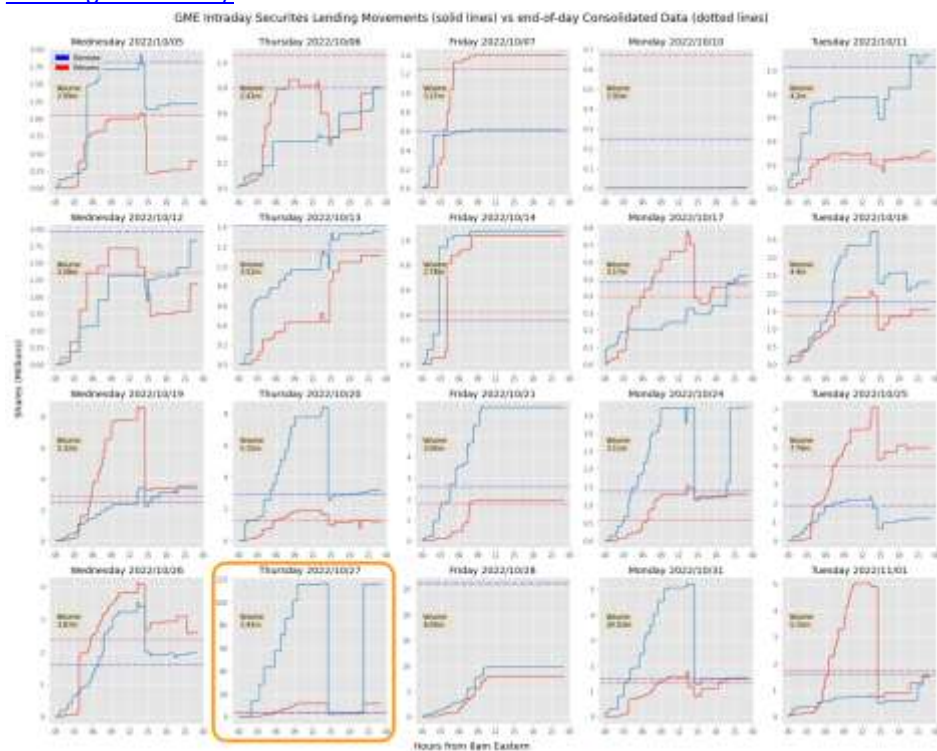
- Note – Ortex claims issue as borrower may cancel loan before fulfilling leading to difference in data collected (cumulative vs intraday) in final opinion



- On the first day when redditors had noticed the discrepancy Ortex had responded with the same cause, yet required 2 weeks to investigate and state they have discovered the underlying issue & info between that time till the opinion was unreliable. If the issue was identified day one, why did they allow the issue to persist for >1 week?

[https://www.reddit.com/r/Superstok/comments/ye8wp2/comment/ity91df/?utm\\_source=share&utm\\_medium=web3x&utm\\_name=web3xcss&utm\\_term=1&utm\\_content=share\\_button](https://www.reddit.com/r/Superstok/comments/ye8wp2/comment/ity91df/?utm_source=share&utm_medium=web3x&utm_name=web3xcss&utm_term=1&utm_content=share_button)

- Redditor analysis of Ortex response – Suspects data was real unfiltered data from FIS (Ortex data provider)  
[https://www.reddit.com/r/Superstok/comments/yor0gy/the\\_borrowed\\_shares\\_we\\_saw\\_from\\_ortex\\_are\\_real/](https://www.reddit.com/r/Superstok/comments/yor0gy/the_borrowed_shares_we_saw_from_ortex_are_real/) +  
[https://old.reddit.com/r/Superstok/comments/ygwlbh/ortex\\_likely\\_receives\\_short\\_interest\\_data\\_from/](https://old.reddit.com/r/Superstok/comments/ygwlbh/ortex_likely_receives_short_interest_data_from/)
- Redditor querying the answer provided by Ortex - Ortex claimed data provider added returned shares to borrowed shares causing spike – however on Ortex graph on 27/10/23 shows stepwise input of data for borrowed shares & more linear input for returned shares not consistent with simply adding to borrowed + only effected select stocks (not systematic - ?data provider only for these select stocks)  
[https://www.reddit.com/r/Superstok/comments/yppcir/does\\_the\\_explanation\\_for\\_the\\_borrowed\\_shares/](https://www.reddit.com/r/Superstok/comments/yppcir/does_the_explanation_for_the_borrowed_shares/) +  
[https://www.reddit.com/r/Superstok/comments/ykacjy/an\\_update\\_regarding\\_intraday\\_lending\\_and\\_short/](https://www.reddit.com/r/Superstok/comments/ykacjy/an_update_regarding_intraday_lending_and_short/)



- Ortex AMA Superstok edited video – (Sadly full video missing)  
[https://www.reddit.com/r/Superstok/comments/yhm2cw/ortex\\_guy\\_basically\\_says\\_stock\\_market\\_is\\_a\\_scam/](https://www.reddit.com/r/Superstok/comments/yhm2cw/ortex_guy_basically_says_stock_market_is_a_scam/)
- **Fidelity 13.7 million Shares available for lending**

- On 30/11/21 – Fidelity reported 13 million GME shares available to borrow on Fidelity Investments platform
  - Shares available to Short increased from 1.3million to 13.7million shares – 12.1million increase in <12hours
  - [https://old.reddit.com/r/fidelityinvestments/comments/r5pz1i/shortable\\_shares\\_for\\_gme/](https://old.reddit.com/r/fidelityinvestments/comments/r5pz1i/shortable_shares_for_gme/) + <https://imgur.com/a/Jp9RhXC> + [https://www.reddit.com/r/fidelityinvestments/comments/r5pz1i/shortable\\_shares\\_for\\_gme/](https://www.reddit.com/r/fidelityinvestments/comments/r5pz1i/shortable_shares_for_gme/)

Transaction Type	Symbol
Stocks/ETFs ▼	GME


**GAMESTOP CORP (GME)**

**193.48** [-]

↓ -8.53 (-4.2226%)


x 255 FINY


Bid	193.79 x 1	IEXG
Ask	194.18 x 3	XNYS
Vol	484,559	

AS OF 11/30/2021 11:01 AM ET 

---

Action	Quantity
Sell Short ▼	<input type="text"/>

 Calculate Quantity

[Margin Calculator](#) 

Hard to Borrow, Available to Short: 13,734,592 Shares

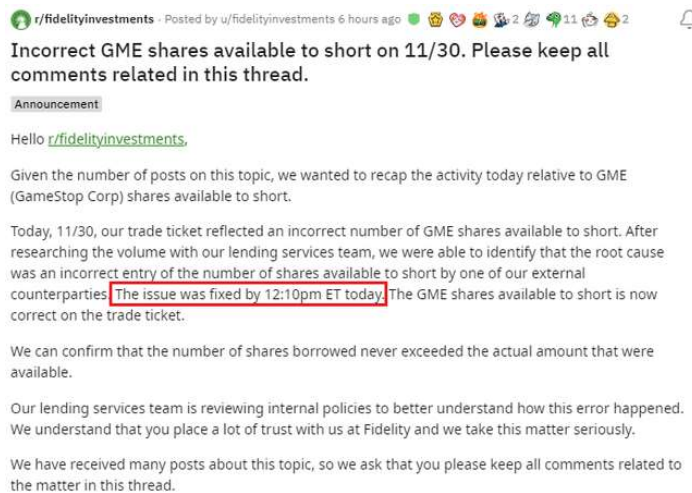
Est. Annual Interest Rate: 0.750%

[What do these mean?](#)

- Fidelity original response to above Redditor – “We have researched the issue with our lending services. In looking into the issue, it was found that one of the counterparties that may provide us shares to short had entered an incorrect number of shares available to short. That error caused the number of shortable shares to be overestimated by approximately 11,000,000. We have rectified the issue and the trade ticket should reflect the correct amount of shares that maybe available to short, which is approximately 2 million.”
   
[https://web.archive.org/web/20211201003938/https://old.reddit.com/r/fidelityinvestments/comments/r5pz1i/shortable\\_shares\\_for\\_gme/](https://web.archive.org/web/20211201003938/https://old.reddit.com/r/fidelityinvestments/comments/r5pz1i/shortable_shares_for_gme/)



- Fidelity later responds by stating Available shares was an error & issue was resolved at 12:10pm ET (as below) [https://www.reddit.com/r/fidelityinvestments/comments/r5wrov/incorrect\\_gme\\_shares\\_available\\_to\\_short\\_on\\_1130/](https://www.reddit.com/r/fidelityinvestments/comments/r5wrov/incorrect_gme_shares_available_to_short_on_1130/)
- Correlated with price decline in GME Share price that ceased at 12:10pm [https://www.reddit.com/r/Superstonk/comments/r64ljj/must\\_be\\_another\\_coincidence\\_fidelitys\\_error\\_of/](https://www.reddit.com/r/Superstonk/comments/r64ljj/must_be_another_coincidence_fidelitys_error_of/)



- Note – Share volume = 6,895,600 on 30/11/21

Dec 2, 2021	46.25	46.86	43.37	45.39	45.39	8,348,400
Dec 1, 2021	49.85	50.03	44.25	44.86	44.86	8,406,000
Nov 30, 2021	50.03	50.99	47.00	48.06	48.06	8,885,800
Nov 29, 2021	51.00	51.98	50.34	50.50	50.50	4,435,200
Nov 26, 2021	52.02	52.93	49.80	49.93	49.93	4,941,200

- Suspected Fidelity loaned shares using customer's accounts or selling options with customer's 'beneficially owned' shares as collateral
- Previous history - Fidelity alleged to have utilised customer's account to lend shares despite customer declining, lawsuit filed & later denied due to suspicious activity report filed by Fidelity against customer -

[https://www.financialadvisorig.com/c/2520373/283533/fidelity\\_fight\\_with\\_defunct\\_moves\\_toward\\_supreme\\_court](https://www.financialadvisorig.com/c/2520373/283533/fidelity_fight_with_defunct_moves_toward_supreme_court)

**REQUESTS FOR DIRECT REGISTRATION AT BROKER ARE DELAYED OR NOT AVAILABLE OR CHARGED EXORBITANT FEES TO DISCOURAGE. TO INITIATE TRANSFER BROKER PROVIDES MISLEADING MANDATORY ADVICE. RECEIVED SHARES IN DRS OFTEN DON'T INCLUDE COST BASIS INFORMATION.**

- In August 2006 in conjunction with SEC, all US Stock exchanges required direct registration to be available as a listing requirement for newly listed stocks. In March 2008 this requirement was extended to all US listed stocks. (NYSE2006) <https://www.sec.gov/files/rules/sro/nyse/2006/34-54289.pdf> (NYSE2008) <https://www.sec.gov/files/rules/sro/nasdaq/2007/34-57062.pdf> (Computershare info sheet [https://content-assets.computershare.com/eh96rkuu9740/630fe903fa8f4b81acd2c1ebfb8e5f05/a2e2389f35e8f0d48b814fdd14890c57/About\\_the\\_Direct\\_Registration\\_System.pdf](https://content-assets.computershare.com/eh96rkuu9740/630fe903fa8f4b81acd2c1ebfb8e5f05/a2e2389f35e8f0d48b814fdd14890c57/About_the_Direct_Registration_System.pdf) )
- Direct Registration at the request of the investor allows for shares to be directly registered in the investors name with the issuer/transfer agent rather than registered as a beneficiary of Cede&Co (DTC) - <https://www.dtcc.com/settlement-and-asset-services/securities-processing/direct-registration-system>
- Influx of Retail Investors in 2021 actively direct registering shares
- Retail investors identified several issues when attempting to DRS
  - Significant & varying delays when attempting to DRS – 3-5 business days with compliant brokers, whereas other less reliable brokers took 2-6weeks to complete DRS process
  - Several brokers (especially introductory brokers & CFD-related brokers) do not offer DRS to investors – CMC Markets / Etoro / CommSec
  - Varying fees for DRS – Majority free or <\$10, some brokers charged >\$100 per request, actively disincentivising investors
  - All brokers provision advice on DRS request emphasising risk of inability to sell, excessive fees at transfer agent
- Broker claims delay from transfer agent - [https://www.reddit.com/r/Superstonk/comments/psgwzg/2\\_week\\_wait\\_time\\_to\\_transfer\\_is\\_strictly\\_on/](https://www.reddit.com/r/Superstonk/comments/psgwzg/2_week_wait_time_to_transfer_is_strictly_on/) + [https://www.reddit.com/r/Superstonk/comments/py7vs0/the\\_delay\\_is\\_on\\_the\\_transfer\\_agents\\_side/](https://www.reddit.com/r/Superstonk/comments/py7vs0/the_delay_is_on_the_transfer_agents_side/)
- Computershare (transfer agent) – Claims no delays on transfer agent side, usually complete within 1 working day after receiving request, no visibility of request on intermediary (DTC/Broker) side - <https://www.computershare.com/us/becoming-a-registered-shareholder-in-us-listed-companies>

**Are you experiencing delays with processing shareholder registrations? Is there a backlog?**

No. We have not experienced delays in processing new shareholder registrations in DRS form. We generally complete all requests to transfer from "street name" to registered form by the end of the next working day after receipt, provided such request is in good order (well within regulated timeframes). Please note that we have no knowledge or visibility of the point at which a beneficial owner asks their intermediary to initiate the transfer of their position from 'street name' to a direct registered shareholding and the relevant DTC participant initiating a DRS transfer via DTC with the required information.

**How long does it take to transfer shares from beneficial to registered ownership?**

We can't usually tell how long has passed between a shareholder's request to transfer shares to direct ownership and the request being passed to us by the intermediary but, once we receive it, we should process it fully by the end of the next working day.


**Are you notified when a shareholder asks an intermediary to transfer shares to registered ownership through Computershare?**

No. Computershare does not receive any information about a request to transfer shares to DRS. We are only notified when the transfer is initiated by a DTC participant. A DTC participant may be your US broker, a clearing firm acting for your US broker, or a custodian acting for your international broker or another intermediary (e.g. an international central securities depository) who, in turn, is acting for your international broker. We have no visibility of where your instruction sits in the chain.

- Investor created website on DRS including FAQs & how to DRS via broker – includes timeframes taken to DRS from brokers based on retail investor experience - <https://www.drsgme.org/>
- Fidelity (Broker) – Allows for DRS, no cost & takes 3-5 business days after request & shares settled to reach Computershare (transfer agent)  
[https://www.reddit.com/r/Superstonk/comments/skfhyt/after\\_i\\_drs\\_shares\\_how\\_long\\_does\\_it\\_take\\_to\\_get/](https://www.reddit.com/r/Superstonk/comments/skfhyt/after_i_drs_shares_how_long_does_it_take_to_get/) +  
[https://www.reddit.com/r/fidelityinvestments/comments/q6nnm9/how\\_long\\_are\\_drs\\_transfers\\_taking/](https://www.reddit.com/r/fidelityinvestments/comments/q6nnm9/how_long_are_drs_transfers_taking/) + <https://www.drsgme.org/drs/direct-register-shares-from-fidelity>
- IBKR (Broker) – Allows DRS, \$5 fee, previously took 2-3days -> up to 30days  
<https://www.drsgme.org/drs/direct-register-shares-from-interactive-brokers> +  
[https://www.reddit.com/r/Superstonk/comments/w8gwsd/ibkr\\_now\\_stating\\_the\\_drs\\_time\\_up\\_to\\_30\\_days\\_we/](https://www.reddit.com/r/Superstonk/comments/w8gwsd/ibkr_now_stating_the_drs_time_up_to_30_days_we/) +  
[https://www.reddit.com/r/Superstonk/comments/tg69ht/fuck\\_ibkr\\_they\\_just\\_changed\\_the\\_terms\\_to\\_make\\_drs/](https://www.reddit.com/r/Superstonk/comments/tg69ht/fuck_ibkr_they_just_changed_the_terms_to_make_drs/)


**Deliver Shares to the Issuer's Transfer Agent / Registrar**

DRS (Direct Registration System) can be used to remove shares held in book-entry form at IBKR and have the issuer's Transfer Agent hold the shares electronically in your name. The Transfer Agent will issue you a Direct Registration Statement.


 **FAST**

While transfer agents typically respond to a request in 1 to 3 days, requests may take up to 30 days to complete.

[More information](#)

 **FEES**

Processing fees apply: USD 5 per settled transaction.

 **STEP**

Use your IBKR login to initiate the DRS transfer request. IBKR will transmit the electronic DRS request to the agent.

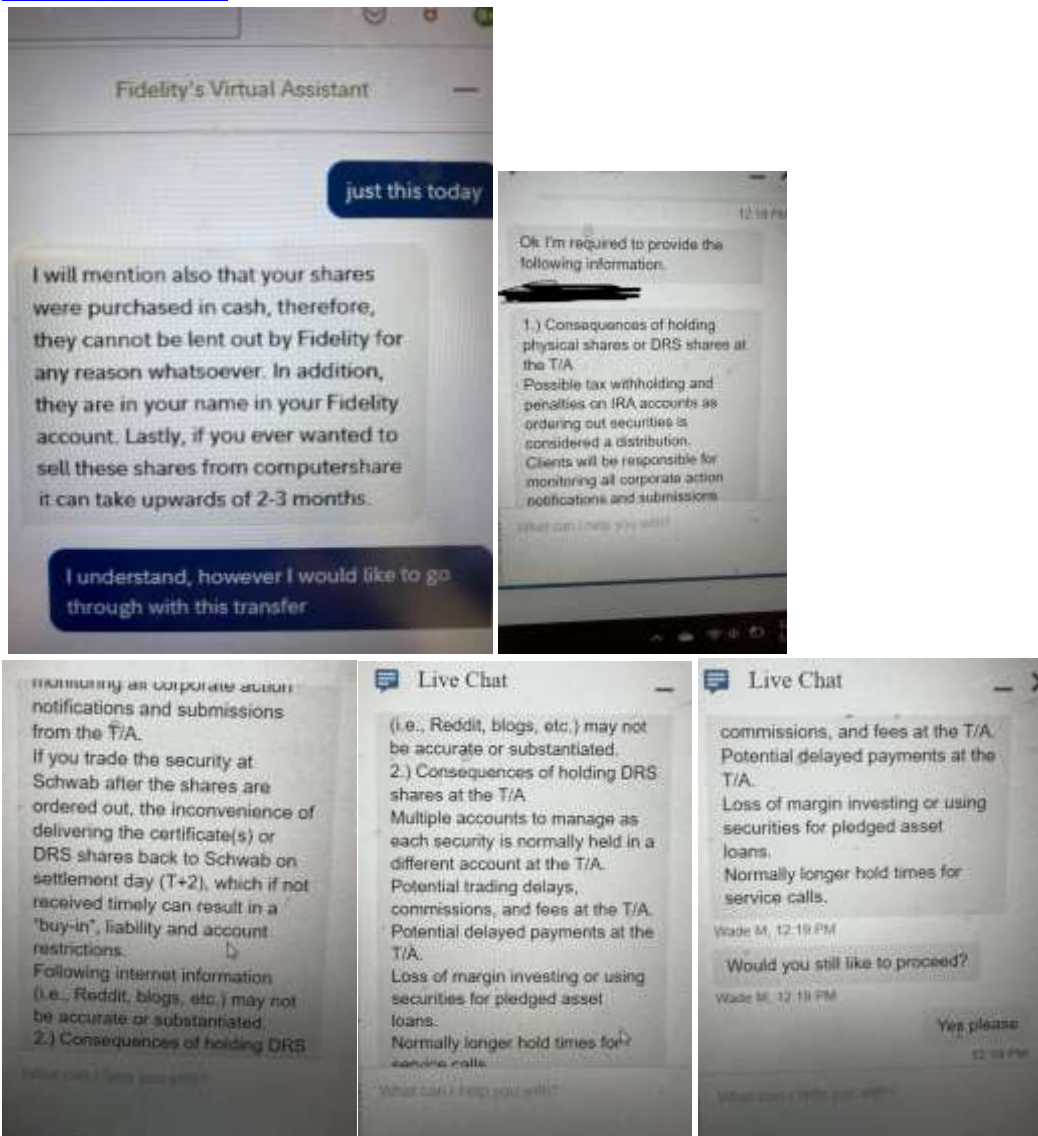
**SELECT**

- TD Ameritrade (Broker) – Allow DRS, no cost, takes 7-9 days however often delayed to 2-4weeks  
[https://www.reddit.com/r/Superstonk/comments/pstjgt/wtf\\_tda/](https://www.reddit.com/r/Superstonk/comments/pstjgt/wtf_tda/)



- Etrade (Broker) – Allow DRS, \$60 Fee, typically 2 weeks however can be delayed ‘indefinitely’  
[https://www.reddit.com/r/Superstonk/comments/tf4ji2/etrade\\_is\\_delaying\\_drs\\_requests\\_indefinitely\\_due/](https://www.reddit.com/r/Superstonk/comments/tf4ji2/etrade_is_delaying_drs_requests_indefinitely_due/) + <https://www.drsgme.org/drs/direct-register-shares-from-etrade>
- BMO Investorline (Broker) – Allow DRS, \$100 Fee per transfer, 3-10 business days  
<https://www.drsgme.org/drs/direct-register-shares-from-bmo-investorline>
- Wealthsimple (Broker) – Allow DRS, \$250 up to \$305 Fee per transfer, 3-10 business days  
<https://www.drsgme.org/drs/direct-register-shares-from-wealthsimple> +  
[https://www.reddit.com/r/Superstonk/comments/povqdp/after\\_the\\_hold\\_there\\_is\\_now\\_305\\_fee\\_to\\_direct/](https://www.reddit.com/r/Superstonk/comments/povqdp/after_the_hold_there_is_now_305_fee_to_direct/)
- Questrade (Broker) – Allow DRS, \$336 Fee per transfer, 2-3 days quoted – typically 10-12days  
<https://www.drsgme.org/drs/direct-register-shares-from-questrade> +  
[https://www.reddit.com/r/GMECanada/comments/q83599/questrade\\_lying\\_about\\_drs\\_transfer\\_time\\_expect/](https://www.reddit.com/r/GMECanada/comments/q83599/questrade_lying_about_drs_transfer_time_expect/)
- Etoro (Broker) – Do not allow DRS, do not allow any transfer including ACAT outside of Etoro, claim to be underlying asset however pool in omnibus account, predominantly offers CFD activity for international assets, based in Cyprus [https://help.etoro.com/s/article/why-can-t-i-use-the-direct-registration-system-drs-to-transfer-my-stocks?language=en\\_GB](https://help.etoro.com/s/article/why-can-t-i-use-the-direct-registration-system-drs-to-transfer-my-stocks?language=en_GB)
- CommSec (Broker) – Previously allowed DRS with waived \$100 Fee – typically 4-6weeks, however in June 2023 ceased DRS  
[https://www.reddit.com/r/Superstonk/comments/14dc17k/largest\\_australian\\_broker\\_commsec\\_removes\\_the/](https://www.reddit.com/r/Superstonk/comments/14dc17k/largest_australian_broker_commsec_removes_the/) + <https://www.drsgme.org/drs/direct-register-shares-from-commsec>
- Brokers provide mandatory misleading ‘advice’ on DRS request that there will be excessive delays when selling (Weeks-Months), increased tax liability, should not seek advice from the internet.  
[https://www.reddit.com/r/fidelityinvestments/comments/tfn456/why\\_is\\_fidelity\\_lying\\_to\\_clients\\_about/](https://www.reddit.com/r/fidelityinvestments/comments/tfn456/why_is_fidelity_lying_to_clients_about/) +  
[https://www.reddit.com/r/Superstonk/comments/rve76d/tried\\_to\\_drs\\_from\\_fidelity\\_today\\_and\\_d\\_got\\_a\\_lot\\_of/](https://www.reddit.com/r/Superstonk/comments/rve76d/tried_to_drs_from_fidelity_today_and_d_got_a_lot_of/) +  
[https://www.reddit.com/r/Superstonk/comments/18wxt3y/they\\_getting\\_scared\\_tried\\_to\\_drs\\_and\\_schwab\\_must/](https://www.reddit.com/r/Superstonk/comments/18wxt3y/they_getting_scared_tried_to_drs_and_schwab_must/) +  
[https://www.reddit.com/r/Superstonk/comments/11h5dbu/just\\_had\\_an\\_interesting\\_call\\_to\\_drs\\_a\\_few\\_hundred/](https://www.reddit.com/r/Superstonk/comments/11h5dbu/just_had_an_interesting_call_to_drs_a_few_hundred/) +  
[https://www.reddit.com/r/Superstonk/comments/r81pke/convinced\\_my\\_friend\\_to\\_drs\\_shares\\_and\\_fidelity/](https://www.reddit.com/r/Superstonk/comments/r81pke/convinced_my_friend_to_drs_shares_and_fidelity/) +

[https://www.reddit.com/r/fidelityinvestments/comments/gpn9gx/why\\_is\\_fidelity\\_instructing\\_its\\_customer\\_service/](https://www.reddit.com/r/fidelityinvestments/comments/gpn9gx/why_is_fidelity_instructing_its_customer_service/)



- Computershare allows selling immediately during market hours with market/limit orders on the day of request with the transaction settling in T+2 (as per every DTC participant) (CS DRS Terms) <https://cda.computershare.com/Content/ee78ba0b-8e6c-4b56-9e2a-7b0aa3355b90>
- Fidelity (Broker) – Charging \$100 to DRS MMTLP via ATS (Note free for GME via CS) – Concerning as MMTLP shares underwent controversial forced halting 2 days before cancellation by FINRA, these 2 days were meant for Short closing – including naked shorts, high risk of significant phantom shares in MMTLP & risk of exposure with DRS [https://www.reddit.com/r/NextBridgeHC/comments/zzd9ye/fidelity\\_is\\_going\\_to\\_charge\\_100\\_if\\_you\\_want\\_to/](https://www.reddit.com/r/NextBridgeHC/comments/zzd9ye/fidelity_is_going_to_charge_100_if_you_want_to/)
- Lack of cost basis for shares received from broker despite mandatory DTCC CBRS (Cost Basis Reporting System) [https://www.reddit.com/r/GME/comments/pn0c9h/can\\_anyone\\_that\\_did\\_a\\_drs\\_from\\_their\\_broker\\_find/](https://www.reddit.com/r/GME/comments/pn0c9h/can_anyone_that_did_a_drs_from_their_broker_find/) + [https://www.reddit.com/r/Superstonk/comments/tg188i/are\\_you\\_missing\\_cost\\_basis\\_in\\_computershare\\_you/](https://www.reddit.com/r/Superstonk/comments/tg188i/are_you_missing_cost_basis_in_computershare_you/) + [https://www.reddit.com/r/Superstonk/comments/qonc19/nov\\_4th\\_c0000809xxx\\_no\\_cost\\_basis\\_give\\_me\\_my/](https://www.reddit.com/r/Superstonk/comments/qonc19/nov_4th_c0000809xxx_no_cost_basis_give_me_my/) +

[https://www.reddit.com/r/Superstonk/comments/ydzc69/response\\_from\\_td\\_ameritrade\\_in\\_regards\\_to\\_my/](https://www.reddit.com/r/Superstonk/comments/ydzc69/response_from_td_ameritrade_in_regards_to_my/) +

[https://www.reddit.com/r/superstonkuk/comments/tgfj1n/computershare\\_showing\\_000\\_as\\_cost\\_basis\\_after\\_drs/](https://www.reddit.com/r/superstonkuk/comments/tgfj1n/computershare_showing_000_as_cost_basis_after_drs/) +

[https://www.reddit.com/r/GMECanada/comments/q85mp0/cost\\_basis\\_on\\_computershareus\\_after\\_drs\\_transfers/](https://www.reddit.com/r/GMECanada/comments/q85mp0/cost_basis_on_computershareus_after_drs_transfers/) +

[https://www.reddit.com/r/Superstonk/comments/13io6pg/no\\_cost\\_basis\\_on\\_drs\\_transfers\\_from\\_charles\\_schwab/](https://www.reddit.com/r/Superstonk/comments/13io6pg/no_cost_basis_on_drs_transfers_from_charles_schwab/) +

[https://www.reddit.com/r/Superstonk/comments/s95yag/ibkr\\_do\\_not\\_include\\_cost\\_basis\\_for\\_drs\\_transfers/](https://www.reddit.com/r/Superstonk/comments/s95yag/ibkr_do_not_include_cost_basis_for_drs_transfers/) +

[https://www.reddit.com/r/superstonkuk/comments/tgfj1n/computershare\\_showing\\_000\\_as\\_cost\\_basis\\_after\\_drs/](https://www.reddit.com/r/superstonkuk/comments/tgfj1n/computershare_showing_000_as_cost_basis_after_drs/) +

[https://www.reddit.com/r/Superstonk/comments/zdn6u7/drs\\_etrade\\_and\\_cost\\_basis/](https://www.reddit.com/r/Superstonk/comments/zdn6u7/drs_etrade_and_cost_basis/)

**Transaction Details** ↻

**GAMESTOP CORP** Export -

---

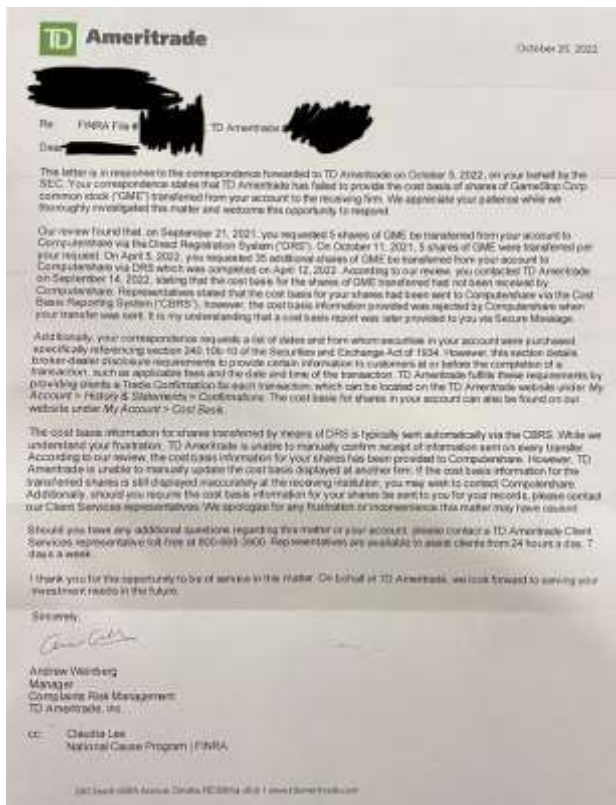
**Cost Basis and Tax Information Summary**

Type	Shares	Proceeds	Cost Basis
Covered	0	\$0.00	\$0.00
Non-covered (1)	0	\$0.00	\$0.00
Non-covered (2)	75	\$0.00	N/A

---

**Share Lot Details**

Original Date	Transaction Type	Original Price	Shares	Type	Cost Basis
8/24/2021	DTC STOCK WITHDRAWALS (DRS)		75	Non-covered	\$0.00





- CBRS - <https://www.dtcc.com/clearing-services/equities-clearing-services/cbrs>
- Incorrect Cost Basis with incorrect dates & share price exceeding any GME Share price prior to 2024 (>\$500/sh, transferred from Robinhood)  
[https://www.reddit.com/r/Superstonk/comments/qt43fc/so\\_i\\_checked\\_my\\_cost\\_basis\\_after\\_drs\\_i\\_did\\_not/](https://www.reddit.com/r/Superstonk/comments/qt43fc/so_i_checked_my_cost_basis_after_drs_i_did_not/)

Line Nbr	Date	Acquisition Price Per Share	Cost Basis Per Share	Available Balance	Type
*1	12/27/2020	N/A	\$420.51	0.0078	Covered
*2	1/1/2021	N/A	\$500.00	0.0002	Covered
*3	1/1/2021	N/A	\$389.26	0.1638	Covered
*4	1/1/2021	N/A	\$388.77	0.2439	Covered
*5	1/2/2021	N/A	\$402.06	0.3008	Covered
*6	1/4/2021	N/A	\$414.94	0.0462	Covered
*7	1/7/2021	N/A	\$319.50	0.0282	Covered
*8	1/19/2021	N/A	\$356.46	0.3762	Covered
*9	1/23/2021	N/A	\$344.73	0.1415	Covered

- Further incorrect cost basis  
[https://www.reddit.com/r/Superstonk/comments/u9j62p/drs\\_cost\\_basis\\_question/](https://www.reddit.com/r/Superstonk/comments/u9j62p/drs_cost_basis_question/) +  
[https://www.reddit.com/r/Superstonk/comments/17roq71/always\\_check\\_your\\_cost\\_basis\\_even\\_from\\_fidelity/](https://www.reddit.com/r/Superstonk/comments/17roq71/always_check_your_cost_basis_even_from_fidelity/)
- Further incorrect cost basis with recording of ETrade & Computershare voice call  
[https://www.reddit.com/r/Superstonk/comments/1akzz49/witness\\_the\\_shitshow\\_of\\_getting\\_the\\_cost\\_basis/](https://www.reddit.com/r/Superstonk/comments/1akzz49/witness_the_shitshow_of_getting_the_cost_basis/)

#### MARKET PARTICIPANTS UTILISE AMENDMENTS OR SEEK EXCEPTIONS FOR REPORTING ON SEC 13F FILLINGS TO AVOID PUBLICLY LISTING SHORT POSITIONS (INCLUDING OPTIONS) – MELVIN CAPITAL

- 13F Filing – A form required to be filed quarterly by institutional investors that manage over \$100 million <https://www.sec.gov/divisions/investment/13ffaq>
- Melvin Capital requested confidential treatment with SEC to avoid publicly disclosing significant put positions in GME (>600,000 Shares of puts) – ie 13F Filing submitted did not list GME Positions
  - SEC declined confidential request 2 months after filing however allowed Melvin Capital to claim all 600,000 Share Put positions closed via financial media until SEC completed review process
  - Melvin 13F (Using Confidential request) – shows no GME Put position  
[https://www.sec.gov/Archives/edgar/data/1628110/000090571821000618/xslForm13F\\_X01/infotable.xml](https://www.sec.gov/Archives/edgar/data/1628110/000090571821000618/xslForm13F_X01/infotable.xml)
  - Melvin 13F amendment with formal Confidential request (April 2021 + August 2021)  
[https://www.sec.gov/Archives/edgar/data/1628110/000090571821000618/xslForm13F\\_X01/primary\\_doc.xml](https://www.sec.gov/Archives/edgar/data/1628110/000090571821000618/xslForm13F_X01/primary_doc.xml) +  
[https://www.sec.gov/Archives/edgar/data/1628110/000090571821000618/xslForm13F\\_X02/primary\\_doc.xml](https://www.sec.gov/Archives/edgar/data/1628110/000090571821000618/xslForm13F_X02/primary_doc.xml) +  
[https://www.sec.gov/Archives/edgar/data/1628110/000090571821001081/xslForm13F\\_X02/primary\\_doc.xml](https://www.sec.gov/Archives/edgar/data/1628110/000090571821001081/xslForm13F_X02/primary_doc.xml)
  - Financial media noting 600,000 Share Put position Q4 2020  
<https://www.institutionalinvestor.com/article/2bswqvt5gr58738738ykg/portfolio/melvin-capital-added-to-gamestop-shorts-as-wallstreetbets-took-aim>

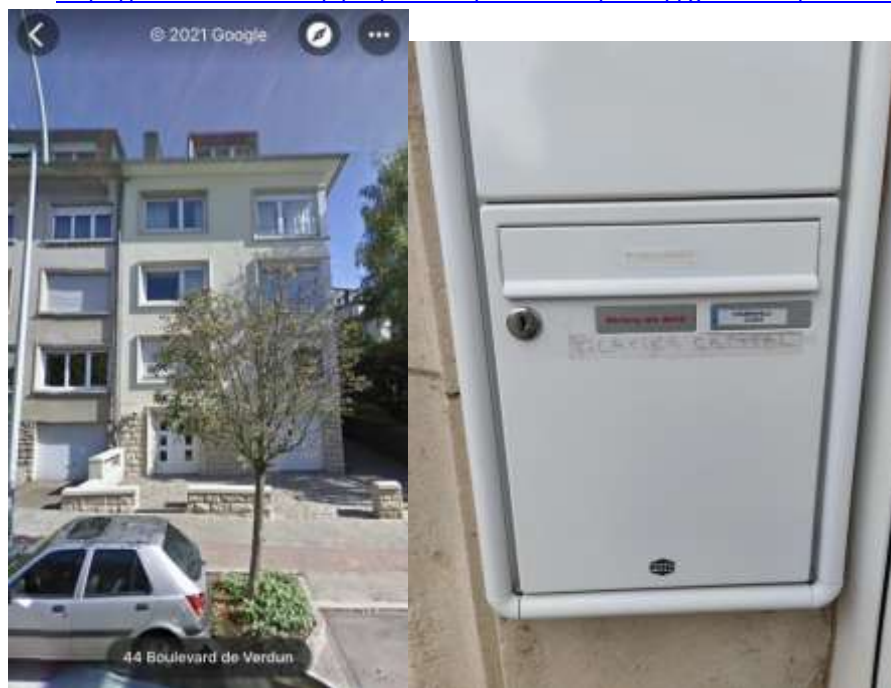
- Financial media claiming closed Put options after 13F Filing  
<https://markets.businessinsider.com/news/stocks/melvin-capital-closes-out-public-short-positions-after-gamestop-losses-2021-5-1030447490>

According to a filing submitted to the Securities and Exchange Commission, the New York-based hedge fund exited all of its put options — meaning its bets against certain stocks — in the first three months of the year.

Those short positions included Reddit-driven meme stocks GameStop and AMC Entertainment, along with other lesser-known names like logistics company Cryoport, healthcare company Viatrix, and Invesco Solar ETF.

### GLACIER CAPITAL FIASCO

- Glacier Capital releases a letter to investors on 17/5/21 claiming to have opened a short position against GameStop at \$167/sh after recently closing a short position at \$12/sh (opened at \$5.30)  
<https://seekingalpha.com/article/4429241-glacier-capital-q1-2021-letter-to-investors>
- Glacier's new short position widely spread to social media
- On further investigation it is discovered by redditors:
  - Glacier Capital – <http://glaciercapital.lu/>
  - Phone number provided by website – reaches the personal cell phone & voice mailbox of “Alex Larsen”
  - Address given on website – 44 Boulevard de Verdun, L-2670 Luxembourg – located at an apartment building – on inspection by a redditor who physically went to the location, identified the headquarters was simply a letterbox  
[https://www.reddit.com/r/Superstonk/comments/nezcn1/glacier\\_capital\\_does\\_not\\_exist/](https://www.reddit.com/r/Superstonk/comments/nezcn1/glacier_capital_does_not_exist/) +  
[https://old.reddit.com/r/Superstonk/comments/new7b6/check\\_out\\_glacier\\_capitals\\_head\\_office\\_no/](https://old.reddit.com/r/Superstonk/comments/new7b6/check_out_glacier_capitals_head_office_no/) +  
[https://www.reddit.com/r/Superstonk/comments/nf3sfp/glacier\\_capitals\\_mailbox/](https://www.reddit.com/r/Superstonk/comments/nf3sfp/glacier_capitals_mailbox/)



- The fund is owned by 2 individuals – Marc-Francois Daubenfeld (51.92%) & Norbert Raymond Becker (48.08%) <https://www.lbr.lu/>



- Norbert Raymond Becker was previously Global CFO of Ernest & Young (Big 4 Accounting firm)
- A previous address found on a older shareholder letter & LinkedIn has been identified in the Panama Papers <https://www.linkedin.com/company/glacier-capital/about/> + <https://offshoreleaks.icij.org/nodes/81015287>

#### DATA STORAGE FACILITY / WAREHOUSE FOR TD AMERITRADE/OTHER BROKERS BURNS DOWN (3/2/22) DAY BEFORE DOJ ANNOUNCEMENT OF INVESTIGATION INTO SHORT SELLING/HEDGEFUNDS (4/2/22)

- Note suspicious factors – Entire water sprinkler system destroyed by a falling steel rack, no back up system for protecting documents in Document storage facility, predominantly paper documents with claims that boxes stacked to ceiling, slow response from Firefighters with building allowed to burn, Fast clean up whilst still smouldering (visible in video)
- Evid for destroyed sprinkler system, claim of paper documents + ceiling high <https://www.youtube.com/watch?v=0eC8bZMRxYg&t=1s>
- Evid burning for 2 days minimum <https://abc7chicago.com/bartlett-il-fire-today-warehouse-access/11537202/>
- Evid burning for 4 days – slow process explicitly stated <https://abc7chicago.com/bartlett-il-fire-department-warehouse-access/11541717/>
- Total 6 days <https://www.youtube.com/watch?v=ISSWaxx4qPM>
- Post burning <https://www.youtube.com/watch?v=wf4Pamtj56U>
- Financial Times documents DOJ investigation 4/2/22 <https://www.ft.com/content/08899017-2994-4990-84e8-4a6efb7c57c6>

#### LIKELY PERJURY DURING HOUSE HEARINGS ON GAMESTOP – CLAIMING NO COMMUNICATION BETWEEN ROBINHOOD / CITADEL / KEN GRIFFIN – CONTRADICTED IN HOUSE REP REPORT & LEAKED PHONE CONVERSATIONS

- Citadel CEO Ken Griffin during House Hearing (19/2/21) denies conversation between Citadel & Robinhood Securities in regards to GameStop or anything to prevent people from buying stock – As per Ken Griffin ‘Let me be perfectly clear, absolutely not’ -

<https://www.youtube.com/watch?v=81UPnnjirTE> +  
[https://www.youtube.com/watch?v=RfEuNHVPc\\_k](https://www.youtube.com/watch?v=RfEuNHVPc_k) (Full)

- Robinhood class action & GameStop House of Representatives report confirms there was active conversation between Robinhood & Citadel on the day prior to forced Position Close Only for retail investors - [https://democrats-financialservices.house.gov/uploadedfiles/6.22\\_hfsc\\_gs.report\\_hmsmeetbp.irm.nlrf.pdf](https://democrats-financialservices.house.gov/uploadedfiles/6.22_hfsc_gs.report_hmsmeetbp.irm.nlrf.pdf) (House of Representatives GameStop report pg. 47-5)

**Figure 24:** RH\_HFSC\_00017655 <sup>198</sup>

**Gretchen Howard**  
 01/27/2021 16:39:23

Just a FYI that Dan and I are joining Jim at 5pm on a call with Citadel. They reached out and want to speak this evening and we believe they will make some demands on limiting PFOF across the board. We won't agree to anything but wanted to give you a heads-up.

**Vlad Tenev**  
 01/27/2021 16:44:21

Ok

**Vlad Tenev**  
 01/27/2021 16:44:49

Maybe this would be a good time for me to chat with Ken griffin

Like many other market makers, Citadel Securities grew increasingly concerned about the magnitude of the PFOF rebates it might be required to pay Robinhood associated with GME and AMC given Robinhood's unique PFOF rate structure in an unprecedented trading environment.<sup>199</sup> Neither Citadel Securities employees nor Robinhood employees who spoke with the Committee could pinpoint precisely when the two firms began negotiating PFOF rebates on January 27, 2021.<sup>200</sup> However, it is clear that by early in the evening of January 27, 2021, Citadel Securities employees communicated their concerns regarding PFOF rebates to Robinhood, particularly regarding the skyrocketing PFOF rebates being calculated for GME and AMC.

**Figure 25:** RH\_HFSC\_00017631 <sup>201</sup>

**██████████** Senior Manager, Trading Operations  
 01/27/2021 14:34:43

say I know what you said about GME and AMC... but all are complaining  
 ██████████ is saying they haven't decided but think they want to limit pfof on one or both symbols...

Robinhood and Citadel Securities discussed ways to limit PFOF for one or both symbols.<sup>202</sup> Citadel Securities wanted to make sure that Robinhood understood that the PFOF rebate rates being calculated based upon Robinhood's unique spread-based formula were untenable, especially in the context of the unprecedented volatility and volume. As Citadel employees broached the subject of limiting PFOF rebates within Robinhood, Jim Swartwout expressed frustration with the concerns being relayed by the Citadel employee who managed the relationship with Robinhood.

**Figure 26:** RH\_HFSC\_00017632 <sup>203</sup>

**jim.swartwout**  
 01/27/2021 15:12:19

she always has something to complain about

<sup>199</sup> Citadel Securities briefing with the Committee (Nov. 03, 2021).

<sup>200</sup> Interview with J. Swartwout (Robinhood) (Oct. 22, 2021); Citadel Securities briefing with the Committee (Nov. 03, 2021).

<sup>201</sup> RH\_HFSC\_00017631 (on file with the Committee).

Figure 27: RH\_HFSC\_00017632<sup>208</sup>

Senior Manager, Trading Operations

01/27/2021 14:36:48

my point ...if we do or do not adjust it should be same for all

---

jim.swartwout

01/27/2021 15:02:35

We can route away from her if she doesnt like the new pricing model. The others will be happy to take it at normal rates.

A Senior Vice President at Citadel Securities who managed the relationship with Robinhood contacted Swartwout's team on January 27, 2021 to schedule a call to discuss PFOF.<sup>209</sup> At approximately 6:45 p.m. EST on January 27, 2021, Robinhood and Citadel Securities agreed to have a call to discuss PFOF rebates.<sup>210</sup> At 7:03 p.m. EST, Robinhood emailed its proposal for a \$0.003 per share PFOF rebate rate on GME, retroactive to Monday, January 25, 2021.<sup>211</sup> Simultaneously, Citadel Securities developed a plan suggesting Robinhood place a monetary cap on PFOF fees per symbol per day, for all symbols, going forward.<sup>212</sup> At 8 p.m. EST, Citadel

Securities and Robinhood spoke together by telephone during which Citadel Securities suggested its plan of placing a monetary cap on volatile securities.<sup>213</sup>

Citadel Securities employees described this telephone conversation as blunt and indicated in the call that if Robinhood was unwilling to take actions to limit PFOF rebates being generated, Robinhood would need to look elsewhere to route trades.<sup>214</sup> Jim Swartwout described the conversations between Robinhood and Citadel as tense that day.<sup>215</sup>

According to Citadel Securities' representations to the Committee, Citadel Securities employees did not see Robinhood's email proposal to cap PFOF rates prior to their 8 p.m. EST call.<sup>216</sup> Citadel Securities told the Committee that it did not realize it had received Robinhood's proposal until after the 8 p.m. call. As a result, Citadel Securities employees described the conversation as "two ships passing in the night" because Citadel Securities did not realize that Robinhood had made a proposal – likely not realizing what Citadel Securities had described as not being aware of Robinhood's proposal. Later that evening, senior members of Citadel Securities and Robinhood spoke, and Citadel Securities understood the confusion. Shortly after this evening call, Citadel Securities accepted Robinhood's proposal.

Jim Swartwout emailed the Senior Vice President at Citadel Securities who managed the relationship with Robinhood to tell her, "I am beyond disappointed in how this went down. It's difficult to have a partnership when these kind of things go down this way."<sup>217</sup> Robinhood employees left the conversation frustrated that Citadel Securities had generated their own plan to limit PFOF rebates without considering Robinhood's proposal.<sup>218</sup> On January 30, 2021, the day after widespread trading restrictions, Robinhood emailed out a similar price cap on AMC, limiting PFOF rebate rates to \$0.003 retroactively to January 19, 2021, in addition to the price cap it had placed on GME. Citadel Securities accepted.<sup>219</sup>

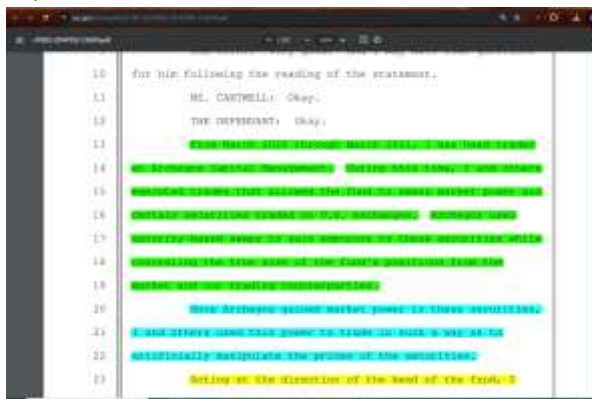
**CNBC ACTIVELY CENSORS LIVE GME CONGRESSIONAL HEARING WITH THEIR OWN LIVE BROADCAST – ACHIEVED BY RUNNING A DELAYED FEED AND INSIDIOUSLY SKIPPING CERTAIN CONVERSATIONS – IN PARTICULAR EDITED OUT DENNIS KELLEHER STATING CITADEL IS NOT INTEGRAL TO CURRENT SYSTEM**

- The original Hearing footage edited out is between 2:37:34 and 2:47:52. Here is the missing 10 minutes and 18 seconds.  
<https://www.youtube.com/watch?v=imRzHXRq80I&t=2h37m34s>
- Here is the CNBC coverage 2 seconds before the moment the video jump cuts.  
<https://www.youtube.com/watch?v=d2DU6DXfGPM&t=2h32m25s>

**SUSPECTED INVOLVEMENT OF ARCHEGOS CAPITAL MANAGEMENT WITH GME SWAP EXPOSURE -> ARCHEGOS COLLAPSE -> ABSORBED BY CREDIT SUISSE -> CREDIT SUISSE COLLAPSE -> ABSORBED BY UBS (NOTE ARCHEGOS' REMAINING OPEN POSITIONS NOT PUBLICLY NAMED DESPITE SWAPS IN VALUATIONS MIMICKING GME PRICE IN EARLY 2021, SIMILARLY NO PUBLIC DISCLOSURE WITH CREDIT SUISSE COLLAPSE, OFFICIAL INQUIRY DOCUMENTS SEALED FOR 50YEARS BY SWEDISH PARLIAMENT)**

- Brief summary from Street - <https://www.thestreet.com/memestocks/gme/has-gamestop-stock-been-targeted-by-synthetic-short-positions>

- DOJ Charges 4 individuals for Archegos collapse - <https://www.justice.gov/opa/pr/four-charged-connection-multibillion-dollar-collapse-archegos-capital-management>
- SEC Charges Archegos <https://www.sec.gov/news/press-release/2022-70>
- SEC Comment containing Archegos Court Documents with included swap positions <https://www.sec.gov/comments/s7-08-22/s70822-20147032-312610.pdf> (Credit Suisse closed 97% of their Archegos position, 3% remaining, “Archegos used security based swaps to gain exposure to these securities while concealing the true size of the fund’s positions from the market and our trading counterparties. Once Archegos gained market power in these securities, I and others used this power to trade in such a way as to artificially manipulate the prices of the securities. Acting at the direction of the head of the fund [Hwang], I traded to increase the prices of names in which Archegos held long positions and reduced the prices of securities in which the fund held short positions. I did this by, for example, buying large amounts of a stock when the price dropped in response to negative news or trading premarket when I knew the fund’s activity would have a greater impact on price. I manipulated the prices of these securities in order to influence others in the market to buy or sell the securities in ways that would benefit Archegos’[s] key positions and increase Archegos’[s] purchasing power through variation margin” pg. 181 comment- Case 1:22-cv-03402-JPO Document 35-24 Filed 06/28/22 Page 40 of 51)



- Evid of Archegos GME position – reference to Margin Call in Mar 21 in Credit Suisse account (in SEC Comment above)



- SEC v Hwang Archegos Court Document 38 (Note 41 has swap agreements – can access via PACER NY Court Southern District or in above SEC Comment) Case 1:22-cv-03402-JPO <https://assets.bwbx.io/documents/users/iqjWHBFdfxIU/rcU1aNGt223g/v0>

- CFTC v Hwang Court document  
<https://storage.courtlistener.com/recap/gov.uscourts.nysd.578896/gov.uscourts.nysd.578896.1.0.pdf>
- SEC filed Credit Suisse Archegos Report  
<https://www.sec.gov/Archives/edgar/data/1159510/000137036821000064/a210729-ex992.htm>
- Credit Suisse losses over Archegos <https://www.nytimes.com/2021/07/29/business/credit-suisse-archegos.html>
- Credit Suisse fined over Archegos <https://www.ft.com/content/bee46da8-6677-4ecd-9e27-9a3760737d9f>
- Credit Suisse Collapse Inquiry sealed for 50years  
<https://www.reuters.com/business/finance/credit-suisse-inquiry-will-keep-files-secret-50-years-paper-2023-07-15/>
- UBS merger with Credit Suisse <https://www.reuters.com/markets/deals/ubs-agrees-buy-credit-suisse-more-than-2-bln-ft-2023-03-19/>
- UBS says unwanted Credit Suisse rescue merger & rushed  
<https://www.reuters.com/business/finance/ubs-says-it-was-rushed-into-unwanted-credit-suisse-rescue-merger-2023-05-17/>

**CONSTANT NEGATIVE SENTIMENT ARTICLES OVER 4YEAR PERIOD WITH VERY MINIMAL POSITIVE NEWS ARTICLES (IF POSITIVE SCATTERED WITH NEGATIVE SENTIMENT OR DOWNPLAY OF POSITIVITY)(OFTEN REGARDING MISSED EARNINGS EXPECTATIONS FROM IN-HOUSE ANALYSTS)**

- Very large list (over 4000) of negative leaning articles from 2019-2022 (includes direct links)  
<https://docs.google.com/spreadsheets/d/e/2PACX-1vTZ5PPifoF1n4Qaz4REeMJpktAthsKnETHRDDxiToOVVpqqgofyJcR9kYz8Mubf1goLDrSlyH7z0MdPY/pubhtml?gid=0&single=true> (saved html/excel in folder + archived <https://archive.md/xfPmN>)
  - All articles archived (on Archive org) <https://docs.google.com/spreadsheets/d/1i4ZQrUyy-6ld9umTUVVwjBoR5JwghvrXo5iQQObyr5JBA/edit#gid=0>
- Q4 2023 – first full year profitability in Mar 2024 – no mention of profitability, only of reduced revenue secondary to closure of unprofitable stores (refer to images in folder)

**MULTIPLE DISINGENUOUS ARTICLES WRITTEN PROVIDING EXAGGERATED/COLOURED VIEWS & CHANGING SENTIMENT (I.E. SILVER / HATE SPEECH)**

- Silver Articles changing sentiment (not mentioned regularly on subreddit prior to article) - \$SLV ETF/Futures suggested as next target of WSB as per MSM  
<https://www.bloomberg.com/news/newsletters/2021-02-01/gamestop-gme-is-old-news-after-reddit-discovers-silver-futures-kkmtv8bh> + <https://sg.news.yahoo.com/silver-to-the-moon-says-redditor-but-others-on-wall-street-bets-differ-160221386.html> + <https://coingape.com/silver-slv-short-squeeze-begins-jp-morgan-holds-largest-short-positions/>
- Evid of article documenting unusual uptick in Silver / Bot posts on WSB that was not consistent with the actual activity present <https://www.businessofbusiness.com/articles/wallstreetbets-media-silver-squeeze-wasnt-happening-GME/>
- Wallstreetbets banned for ‘Hate Speech’ - <https://www.forbes.com/sites/rachelsandler/2021/01/27/discord-bans-rwallstreetbets-over-hate-speech-reddit-forum-goes-private/?sh=2aa04f0c2515>
- Heavy negative sentiment framing within weeks of Jan 2021 event (Note every section is negative, price drop, coup, only users who ‘given up’ mentioned, only memes of struggling shown, silence of Keith Gill) - <https://www.businessinsider.com/wallstreetbets-reddit-forum-divided-as-new-users-flood-subreddit-2021-2>

- Death threats to Robinhood CEO / Melvin Capital <https://www.businessinsider.com/robinhood-ceo-vlad-tenev-staying-in-hotel-after-death-threats-2021-2>  
<https://www.bloomberg.com/news/articles/2021-02-05/death-threats-and-hate-force-hedge-funds-to-step-up-security> (note equates to 'storming capitol', 'antisemitic', strong emotive descriptors)  
[https://www.securitiesfinancetimes.com/securitieslendingnews/industryarticle.php?article\\_id=224511&navigationaction=industrynews](https://www.securitiesfinancetimes.com/securitieslendingnews/industryarticle.php?article_id=224511&navigationaction=industrynews) (Citron/Andrew Left also allegedly had death threats, Later investigated & computers seized by FBI)

**AUTHORS OF FINANCIAL MEDIA ARTICLES – FREQUENTLY HAVE NO FINANCIAL EXPERTISE, ONLY ENGLISH/WRITING DEGREES, SOME ARE EVEN PAID OVERSEAS ADVERTISING COMPANIES OR COMPLETELY AI GENERATED**

- Articles by James Rogers – Hundreds of negative leaning articles on MarketWatch – Example 'GameStop's demise could come later this decade, analyst says 27/3/24 – Consistently creates negative sentiments or minimises positive news – MarketWatch & Dow Jones Writer "Financial columnist" - [https://www.marketwatch.com/story/gamestops-demise-could-come-later-this-decade-analyst-says-255df97e?mod=mw\\_quote\\_news](https://www.marketwatch.com/story/gamestops-demise-could-come-later-this-decade-analyst-says-255df97e?mod=mw_quote_news) + <https://www.marketwatch.com/author/james-rogers> + <https://www.linkedin.com/in/james-rogers-06471833>
  - No financial expertise – Bachelor of Arts in English literature & History (Hons), experience as writer/editor

The image shows a screenshot of a LinkedIn profile for James Rogers and a snippet of a MarketWatch article. The article snippet is titled "GameStop's demise could come later this decade, analyst says" and includes a photo of a GameStop store sign. The LinkedIn profile shows James Rogers as a Financial Columnist at Dow Jones, with a background image of a city skyline. Below the profile, there is a list of his work experience.

**Experience**

- Financial Columnist**  
Dow Jones  
Jan 2022 - Present · 2 years  
New York City Metropolitan Area
- Podcast Host**  
Ninety Minutes with Neville Southall  
Oct 2021 - Present · 2 years 8 months
- Podcast Host and Producer, Big Tech Ticket**  
Shortman Studios  
Feb 2021 - Present · 3 years 4 months
- Associate Editor, Financial Advisor IQ at Financial Times**  
Financial Times  
Nov 2021 - May 2022 · 7 months  
New York, United States
- Science & Technology Editor, News Editor**  
Fox News Media  
Jan 2014 - Jan 2021 · 6 years 9 months  
New York  
Wrote news stories and features and managed a team of reporters and contributors. Produced and appeared in science and technology videos. Worked closely with senior management, sales, and partners to develop content strategy.

**Managing Editor**  
TheStreet  
Oct 2008 - May 2014 · 5 years 8 months  
Managed team of reporters, assigned and edited stories and videos. Wrote news stories and features on the tech sector and broader economy. Covered key tech industry events and interviewed CEOs. Reported on earnings, mergers and acquisitions, IPOs and regulatory activity. Produced, wrote and presented video stories on business and technology. Appeared regularly on PBS's Nightly Business Report television program. Live-blogged major events. Developed multimedia content. Edited stories from other...

**Senior Editor, News Editor**  
IBM Tech  
Feb 2004 - Sep 2008 · 4 years 8 months  
Covered major technology events and product launches. Blogged about the technology and security industries. Managed website news schedules and contributors.

**Lead Business Information**  
3 years 11 months

- Senior Reporter, Computer Weekly**  
Oct 2003 - Feb 2004 · 3 years 3 months  
Wrote news and features. Played a key role in editorial team that won PWA Campaigning Magazine of the Year Award.
- Features Editor, IBM Computer Today**  
Mar 1999 - Oct 2000 · 1 year 8 months  
Reported on mainframe computing, software and the storage marketplace. Commissioned features and illustrations; managed a large team of freelancers.
- Staff Writer, What to Buy for Business**




**Reed Business Information**  
5 years 11 months

- Senior Reporter, Computer Weekly**  
Oct 2000 - Feb 2004 - 3 years 5 months  
Wrote news and features. Played a key role in editorial team that won PPA 'Campaigning Magazine of the Year' Award.
- Features Editor, IBM Computer Today**  
Mar 1999 - Oct 2000 - 1 year 8 months  
Reported on midrange computing, software and the storage marketplace. Commissioned features and illustrations; managed a large team of freelancers.
- Staff Writer, What to Buy for Business**  
Apr 1998 - Mar 1999 - 1 year  
Researched and wrote 10,000-word features on all aspects of technology.

---

**Education**

 **University of Leeds**  
Bachelor of Arts (B.A.) - English Literature and History (Joint Honours)

- Article by David Moadel – “You’re your Joysticks: Why Cohen’s \$10M GameStop Buy is not Game-On” – Provides negative sentiment on positive news, advises not to buy GME - Author for Investorplace.com, Motley Fool, Crush the Street, Market Realist, TalkMarkets, TipRanks & Bezinga – <https://investorplace.com/2023/06/hold-your-joysticks-why-cohens-10m-gamestop-buy-is-not-game-on/> + <https://investorplace.com/author/davidmoadel/> + <https://www.linkedin.com/in/davidmoadel/>
  - No financial expertise – Associate degree liberal arts, Bachelor degree & Masters in education, only authored financial content & significant experience as a English teacher/Writer

 **David Moadel**  
InvestorPlace Contributor

**Expertise:** Stocks, Options, Precious metals, Bitcoin, AI/coins

**Education:** Master's degree in education from the American College of Education, Bachelor's degree in education from Florida Atlantic University, Associate's degree in liberal arts from Palm Beach Community College

**About David:**  
David Moadel is a financial writer for InvestorPlace.com. He has a master's degree in education and has authored financial content for multiple websites.

David is also active as a social media influencer, with tens of thousands of followers on YouTube, Twitter, StockTwits, and other popular sites. David writes on topics ranging from stocks to cryptocurrencies, options, precious metals, bonds, futures, and other areas of finance.

Focusing on data rather than emotions, David is always on the lookout for new pathways to financial freedom. Count on David for wealth-building strategies and resources for investors and traders of all financial backgrounds.

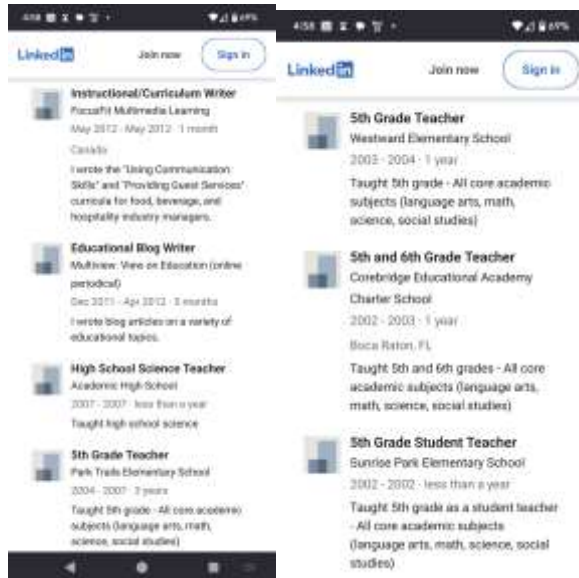
You can follow David on YouTube, Twitter, StockTwits and LinkedIn.

The image displays five screenshots from a mobile phone, showing a LinkedIn profile and a grid of job experience entries. The top screenshot shows the profile of a user with a redacted name and the title 'M.Ed.', listing roles such as 'Financial Writer and Editor, Educator, Consultant, Investor, and Social Media Content Creator' at 'FinMasters.com' and 'American College of Education'. Below this, an 'About' section describes the user as a financial article writer for various publications. The subsequent four screenshots show a grid of job experience entries, each with a title, company name, dates, and a brief description of duties.

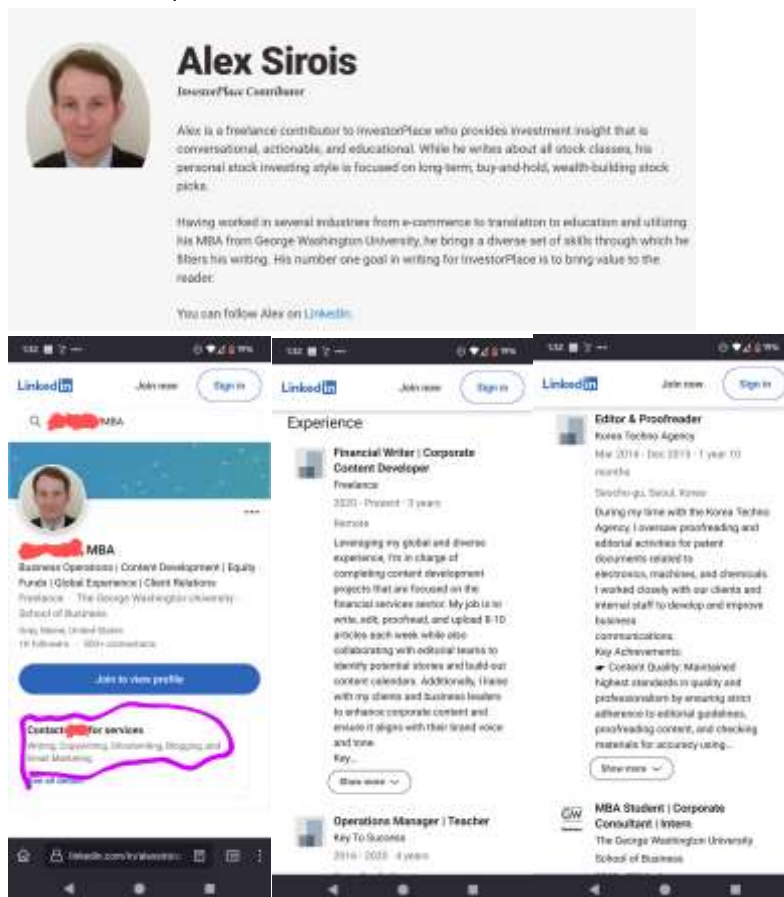
**Profile Information:**  
 Name: [Redacted] M.Ed.  
 Title: Financial Writer and Editor, Educator, Consultant, Investor, and Social Media Content Creator  
 Company: FinMasters.com · American College of Education  
 Location: Boca Raton, Florida, United States  
 Followers: 5K followers · 500+ connections

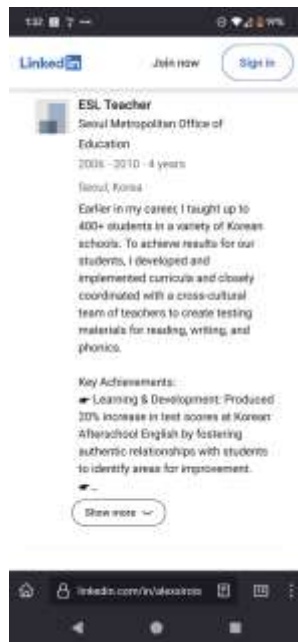
**Experience Grid:**

Job Title	Company	Duration	Location	Description
Financial Writer	Crush the Sheet	Oct 2018 - Present · 8 years 5 months	Beverly Hills, CA	Financial article writer for Crush the Sheet, located at CrushTheSheet.com, since October 17, 2018.
Chief Analyst and Researcher	Portfolio Wealth Global	Mar 2018 - Present · 5 years 4 months	United States	I research, analyze, and present findings on investment perspectives and opportunities.
Editor/Proofreader/Writer	Distinctive Writing	Mar 2012 - Apr 2019 · 7 years 2 months	Lafayette, FL	I served clients needs as an educational writer, editor, and
English Composition, Speech Communication, and Computer Concepts Instructor	Bennett International College	Sep 2019 - Jun 2017 · 1 year 9 months	Raytown Beach, FL	I taught English Composition, Speech Communication, and Computer Concepts courses at the college level.
English and Mathematics Teacher	Slavi Sports Institute	Sep 2018 - Mar 2018 · 7 months	Delray Beach, FL	I taught English and mathematics to students at a local high school that balances academics and athletics.
English Composition, Communication Skills, and Critical Thinking Instructor	Sanford-Brown College of Fort Lauderdale	Mar 2019 - Jun 2015 · 2 years 4 months	Fort Lauderdale, FL	
English Composition, Public Speaking, and Proofreading Instructor	Key College	Nov 2018 - May 2018 · 7 months	Orlando Beach, FL	I taught English Composition, Proofreading, and Public Speaking courses at the college level. November 11 - December 14, 2018. April 7 - May 15, 2018.
Editor/Proofreader/Writer	Interview Success Formula	Mar 2012 - May 2014 · 2 years 3 months	New Haven, CT	I proofread and write for Interview Success Formula, a top consulting and coaching system for job interview success.
English Test Item Writer and Editor	Educator Research Solutions	Oct 2012 - Apr 2013 · 7 months	Sydney, Australia	
Educational Copy Editor	Book Consultants	Dec 2012 - Mar 2012 · 4 months	Forest Grove, Oregon	I copy edited educational materials for educational consulting company Book Consultants.
English Test Material Developer	Latika, Inc.	Dec 2012 - Dec 2012 · 1 month	Tokyo, Japan	From December 13 to December 22, 2012, I developed 1,000 problems for a practice test for the TOEIC (Test of English for International Communication), a test that measures the ability of non-native English speakers to use English in everyday workplace activities) for Latika, Inc. (Tokyo, Japan). My supervisor for this project was Ikuo Inasato, CEO of Latika, Inc. http://www.latika.co.jp/
Educational Writer	Sage Publications	Sep 2012 - Dec 2012 · 4 months		
Educational Research Assistant	Tween Publishing	Jan 2012 - Jan 2012 · 7 months	Newport Beach, California Area	I was an educational research assistant from June 11, 2012, to December 20, 2012, for educational publishing company Tween Publishing, located in Newport Beach, California. Supervisor: Susan Maklaim
Instructional/Curriculum Writer	Creative English Solutions, Inc.	Aug 2012 - Aug 2012 · 1 month	Victoria, B.C., Canada	I was an ESL, instructional material writer for Creative English Solutions, Inc.
Curriculum Consultant	Antony of Change	Jul 2012 - Aug 2012 · 3 months	Worcester, B.C.	I consulted and advised in curriculum writing and instructional presentation.
Instructional/Curriculum Writer				
English Teacher	American High School	Mar 2012 - Aug 2012 · 8 months	Hollywood, Florida	I taught 8th, 9th, and 10th grade English online at American High School, located in Hollywood, Florida. I also assisted with writing and editing the school's online English curriculum.
Writing Coach and Proofreader	The Being Method	Feb 2012 - Jul 2012 · 6 months	Wetzel, CA	I was the writing coach and proofreader for personal development publisher The Being Method.
Educational Writer	The Leadership and Learning Center (part of Houghton Mifflin Harcourt)	Mar 2012 - Jun 2012 · 4 months	Staten, Massachusetts (deceased)	I wrote educational articles on the Common Core Standards and 21st-century teaching and learning for

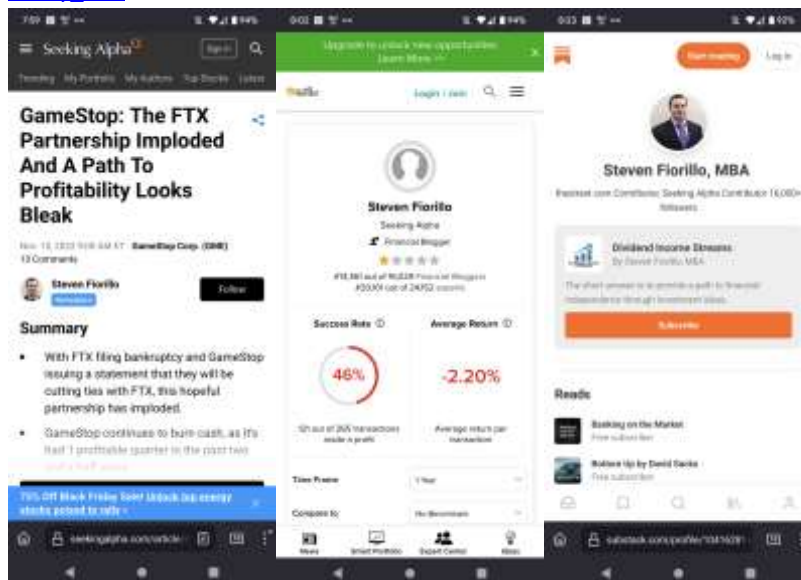


- Redditor post regarding David Moadel’s article [https://www.reddit.com/r/Superstonk/comments/14lIOrk/he\\_actually\\_hand\\_waves\\_away\\_a\\_10\\_million\\_dollar/](https://www.reddit.com/r/Superstonk/comments/14lIOrk/he_actually_hand_waves_away_a_10_million_dollar/)
- Article by Alex Sirois – “7 Dead end stocks to sell before they dive – Dead end stock picks” – Heavy negative sentiment & advises ‘top stocks investors should sell immediately’ – Author for InvestorPlace - <https://investorplace.com/2023/07/7-dead-end-stocks-to-sell-before-they-dive-dead-end-stock-picks/> + <https://investorplace.com/author/asirois/> + <https://www.linkedin.com/in/alexisirois/>
- No Financial expertise – ‘Freelance’ writer, MBA

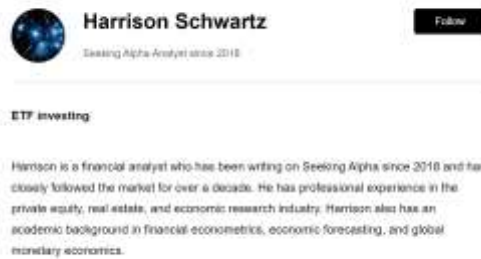




- Redditor analysing Alex Sirosi article  
[https://www.reddit.com/r/Superstonk/comments/14q64fu/a\\_freelance\\_writer\\_offering\\_investment\\_advice/](https://www.reddit.com/r/Superstonk/comments/14q64fu/a_freelance_writer_offering_investment_advice/)
- Article by Steven Fiorillo – ‘GameStop: The FTX Partnership imploded and a path to profitability looks bleak’ – Negative sentiment – No financial expertise (only MBA) – Consistently poor analysis with <46% trades profitable & average return of -2.20% per year  
<https://seekingalpha.com/article/4557376-gamestop-ftx-partnership-imploded-path-profitability-looks-bleak> + <https://seekingalpha.com/author/steven-fiorillo> + [https://www.reddit.com/r/Superstonk/comments/ywtek8/new\\_financial\\_analyst\\_cant\\_easily\\_identify\\_his/](https://www.reddit.com/r/Superstonk/comments/ywtek8/new_financial_analyst_cant_easily_identify_his/)



- Article by Harrison Swartz – ‘GameStop: 2-Year Life expectancy, without a huge Business turnaround’ – Negative sentiment – No credentials or other financial activity outside of writing for Seeking Alpha - <https://seekingalpha.com/article/4599331-gamestop-two-year-life-expectancy> + <https://seekingalpha.com/author/harrison-schwartz> + [https://www.reddit.com/r/Superstonk/comments/136ooq2/i\\_couldnt\\_find\\_the\\_linkedin\\_profile\\_for\\_this/](https://www.reddit.com/r/Superstonk/comments/136ooq2/i_couldnt_find_the_linkedin_profile_for_this/)

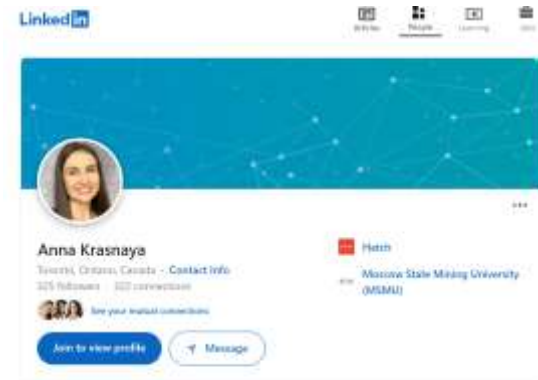


- Article by 'Justin Pope' – 'Don't Let this recent stock split fool you' – Negative sentiment for GME – No financial expertise, simply a decade as a 'student of the market'  
<https://www.nasdaq.com/articles/dont-let-this-recent-stock-split-fool-you> +  
<https://www.fool.com.au/author/justin-pope/> +  
[https://www.reddit.com/r/GME/comments/w6vctf/another\\_financial\\_analyst\\_i\\_cant\\_find\\_a\\_linkedin/](https://www.reddit.com/r/GME/comments/w6vctf/another_financial_analyst_i_cant_find_a_linkedin/)



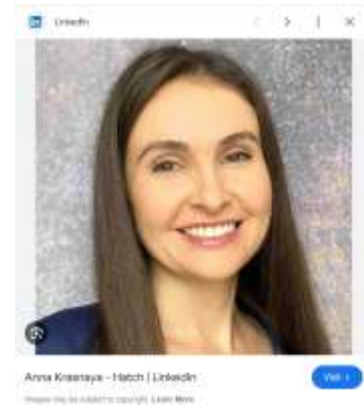
- Fake author - Article by 'Amelia Young' – 'What drove the 35% decline in GME stock after their last earnings report' – negative sentiment & advises 'investors should stay away from GME Stock' – Supposed writer for FintechZoom, NY Times & WSJ 2017  
[https://fintechzoom.com/fintech\\_news\\_stocks/what-drove-the-35-decline-in-gme-stock-after-their-last-earnings-report/](https://fintechzoom.com/fintech_news_stocks/what-drove-the-35-decline-in-gme-stock-after-their-last-earnings-report/)
  - Suspected fake account as Profile picture used identically matches LinkedIn profile of Russian consultant in mining with no alternative social media presence despite several FintechZoom articles –

GME stock has had a dramatic 35% slide after their latest earnings report. This has left many investors wondering what caused the slide and how much further it can drop. We have analyzed the slide and looked at the fundamentals of the company to try and answer these questions. We have also concluded that GME stock is not a good investment right now, as the company is facing a number of headwinds. Investors should stay away from GME stock until the company shows signs of improvement in their next earnings report.



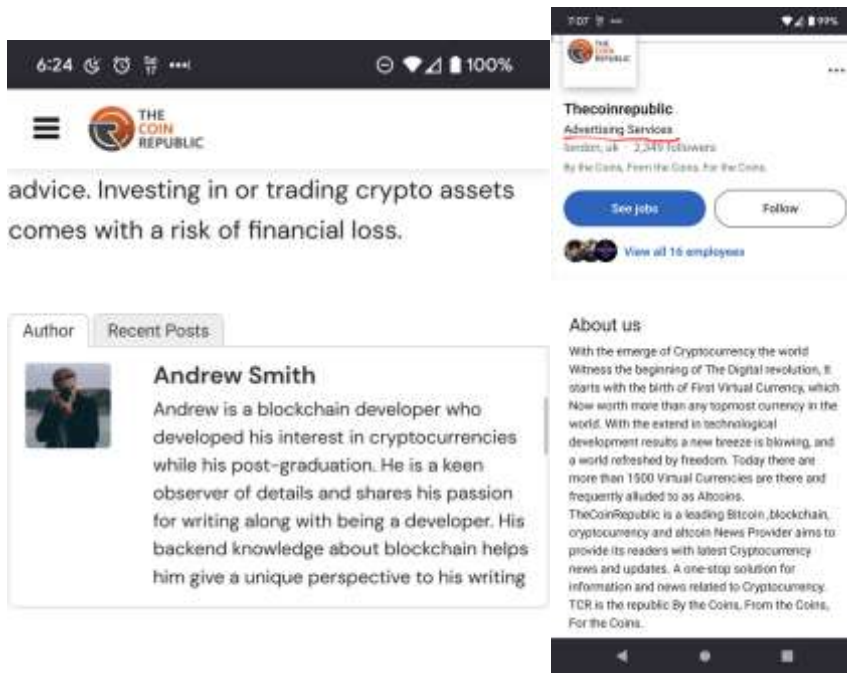
#### About

Over 12 years of experience working on mining and processing projects analysis... see more



- Redditor analysis of article & LinkedIn profile  
[https://www.reddit.com/r/Superstonk/comments/106swx6/someone\\_with\\_better\\_golefu\\_can\\_find\\_her\\_profile/](https://www.reddit.com/r/Superstonk/comments/106swx6/someone_with_better_golefu_can_find_her_profile/)
- Article by “Andrew Smith” – GameStop Stock Price: Prices on Declining streak, Time to Sell GME? – Negative sentiment, advises to sell GME – Article filled with grammatical errors, generic English name, changed profile picture to a different person’s face & ethnicity, no financial expertise, parent company CoinRepublic written in India, employees all Indian & named as Advertising Services  
[https://www.reddit.com/r/Superstonk/comments/zo5c0a/at\\_first\\_touche\\_generic\\_author\\_name\\_is\\_hard\\_to/](https://www.reddit.com/r/Superstonk/comments/zo5c0a/at_first_touche_generic_author_name_is_hard_to/) + <https://www.thecoinrepublic.com/author/andrew-smith/>





- AI Articles created by Financial Media – Majority of daily news – MarketWatch utilises MarketWatch Automation by Automated Insights (Natural language generation platform – AI) to form articles explaining daily price rises/falls in <https://www.marketwatch.com/investing/stock/gme> (under ‘news’ – majority MarketwatchAutomation) + <https://www.marketwatch.com/author/marketwatch-automation> + <https://automatedinsights.com/>

The screenshot shows the MarketWatch website for GameStop Corp. (GME). The stock price is \$15.92, up 0.00% from the previous close of \$15.92. The page features a 'NEWS' section with several articles about GameStop's performance, including headlines like 'GameStop Corp. CI A stock underperforms Wednesday when compared to competitors' and 'GameStop's stock skyrockets 29% to continue rally and register biggest gain in over a year'. Below the news is a section for 'MarketWatch Automation' which provides automated insights into market activity, such as 'TC Energy Corp. stock rises Wednesday, outperforms market' and 'Waste Connections Inc. stock rises Wednesday, outperforms market'.

- Redditor analysing suspected AI activity with multiple articles with conflicting sentiment based on share price during day  
[https://www.reddit.com/r/ddorgtfo/comments/187u7hb/ai\\_that\\_write\\_news\\_to\\_confuse\\_people\\_financial/](https://www.reddit.com/r/ddorgtfo/comments/187u7hb/ai_that_write_news_to_confuse_people_financial/)

### MARKET PARTICIPANTS OWN CONTROLLING INTEREST OR HEAVILY SPONSOR FINANCIAL MEDIA OUTLETS (SUCH AS CNBC / NBC / MOTLEY FOOL / YAHOO FINANCE)

- Motley Fool – Website/Newspaper offered to retail investors as a subscription for investor picks/news/education – In addition to website also participates as an Asset Management fund (MFAM Motley Fool Asset Management) funded by Citadel Securities (Market Maker) & Melvin



Capital (Short Hedgefund on GameStop) – Enormous conflict of interest as providing biased information to subscribers which may align with their proprietary trading strategies

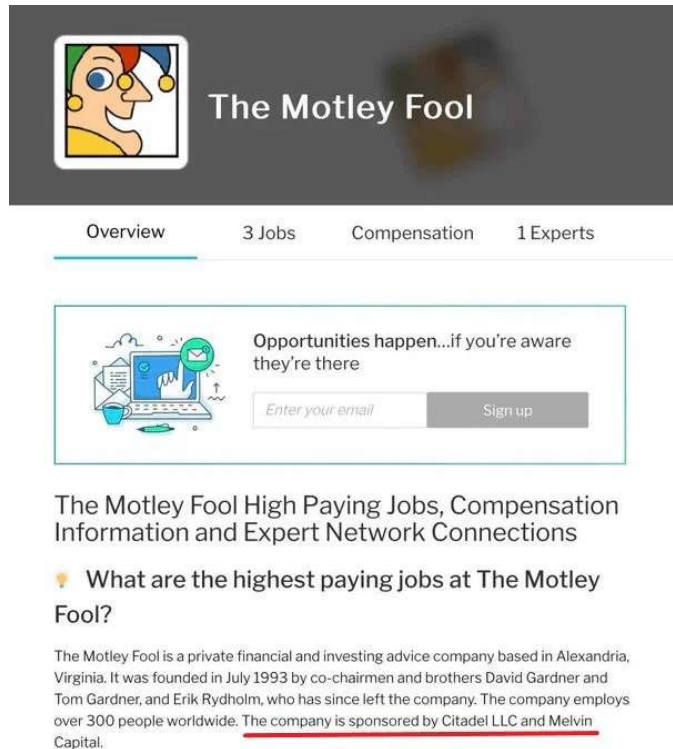
<https://foolwealth.com/> +

[https://www.reddit.com/r/Superstonk/comments/msmh9e/the\\_motley\\_fools\\_money\\_trail\\_to\\_citadel/](https://www.reddit.com/r/Superstonk/comments/msmh9e/the_motley_fools_money_trail_to_citadel/) +

[https://www.reddit.com/r/Superstonk/comments/rolwg5/motley\\_fool\\_uncovered\\_in\\_damage\\_control/](https://www.reddit.com/r/Superstonk/comments/rolwg5/motley_fool_uncovered_in_damage_control/)

- Note – Motley Fool has since deleted any mention of Citadel / Melvin Capital however website was archived prior to removal

(<https://web.archive.org/web/20210514071019/https://www.theladders.com/company/fool-jobs>)



The Motley Fool

Overview 3 Jobs Compensation 1 Experts

Opportunities happen...if you're aware they're there

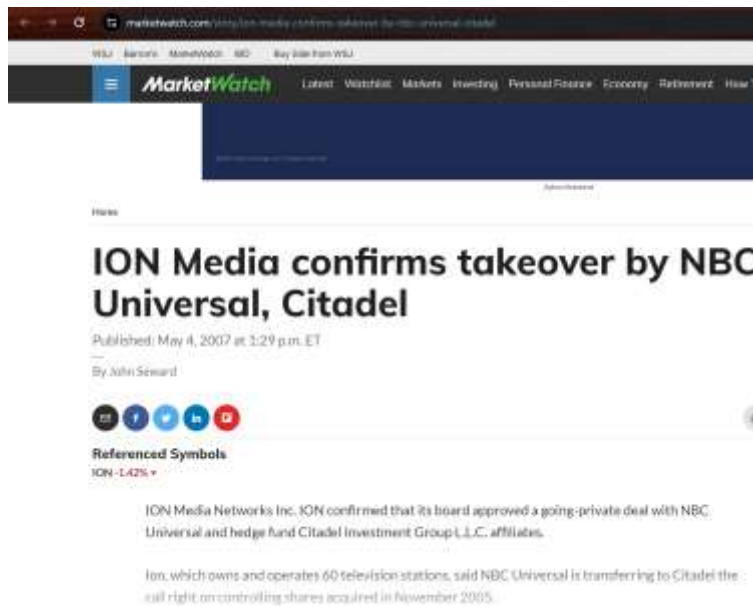
Enter your email Sign up

The Motley Fool High Paying Jobs, Compensation Information and Expert Network Connections

💡 What are the highest paying jobs at The Motley Fool?

The Motley Fool is a private financial and investing advice company based in Alexandria, Virginia. It was founded in July 1993 by co-chairmen and brothers David Gardner and Tom Gardner, and Erik Rydholm, who has since left the company. The company employs over 300 people worldwide. The company is sponsored by Citadel LLC and Melvin Capital.

- Citadel (MM & Hedgefund) owns controlling shares in CNBC & NBC –purchased 2005 - <https://www.marketwatch.com/story/ion-media-confirms-takeover-by-nbc-universal-citadel>



- Apollo Global Management owns Yahoo Finance <https://www.apollo.com/insights-news/pressreleases/2021/09/apollo-funds-complete-acquisition-of-yahoo-161530593>



- Apollo Global Management attempted to acquire GameStop in 2019 <https://www.wsj.com/articles/as-videogame-market-shifts-gamestop-struggles-to-boost-sales-11546561467> + <https://www.cnn.com/2019/01/04/gamestop-shares-surge-12percent-on-report-it-could-announce-a-buyer-soon.html>
- Apollo Global Management hires Ex-SEC Chair Jay Clayton Feb 2021 – immediately after Jan 2021 event <https://www.wsj.com/articles/apollo-names-ex-sec-chairman-jay-clayton-as-lead-independent-director-11613646000>

#### USING FINANCIAL MEDIA TO REFRAME NEGATIVE NEWS FOR LARGE MARKET PARTICIPANTS – ‘GIVE MONEY BACK’ RATHER THAN INVESTORS WITHDRAW FUND

- Articles released via Financial media to reframe negative news by market participants
- Articles flooded Bloomberg / Reuters / CNBC / WSJ etc regarding Citadel ‘give money back’ to investors rather than investors withdraw funds after limiting annual withdrawal limits for investors & requiring \$400million loan day prior (11/12/23)
- Articles source are ‘people familiar with the firm’ (12/12/23) <https://www.reuters.com/business/finance/ken-griffins-citadel-return-about-7-blm-profit-investors-source-2023-12-12/> + <https://www.wsj.com/finance/investing/citadel-is-handing-back-about-7-billion-in-profits-to-clients-ee573657> +

- Citadel requiring \$400million loan via issuing near junk-rated (Baa3) debt on 11/12/23 in addition to existing \$3.4 Billion loan debt <https://www.bloomberg.com/news/articles/2023-12-11/citadel-securities-revenue-jumps-to-1-8-billion-on-volatility> + [https://www.moodys.com/credit-ratings/Citadel-Securities-LLC-credit-rating-830653342/reports?category=Ratings\\_and\\_Assessments\\_Reports\\_rc&type=Rating\\_Action\\_rc|Announcement\\_rc|Announcement\\_of\\_Periodic\\_Review\\_rc](https://www.moodys.com/credit-ratings/Citadel-Securities-LLC-credit-rating-830653342/reports?category=Ratings_and_Assessments_Reports_rc&type=Rating_Action_rc|Announcement_rc|Announcement_of_Periodic_Review_rc) + [https://www.moodys.com/research/Moodys-says-Citadel-Securities-term-loan-upsize-does-not-affect%E2%80%94PR\\_462859](https://www.moodys.com/research/Moodys-says-Citadel-Securities-term-loan-upsize-does-not-affect%E2%80%94PR_462859)
- Loan taken at double the interest rate at time (5.29% vs 2.29% SOFR) - Indicating significant need for funds due to poor terms <https://www.ft.com/content/f3206b39-0cd9-4956-8a87-f5b2f85025ea>
- Citadel requiring outside funding 2022 for 1<sup>st</sup> time since founding in 2002 <https://www.wsj.com/articles/citadel-securities-to-receive-first-outside-investment-11641905101>
- Additional \$600mil Debt via Junk-rated (Baa3) bonds released in July 2023 <https://www.bloomberg.com/news/articles/2023-07-24/citadel-securities-trading-revenue-slides-35-on-muted-market>
- Citadel changes withdrawal limits in 2021 to a maximum of 6.25% per quarter (ie 4 years to withdraw 100%) <https://www.bloomberg.com/news/articles/2021-12-06/millennium-citadel-winning-the-war-to-keep-client-cash-longer>

#### Longer Lock Ups

Firm	New Withdrawal Terms	Old Terms
Citadel	6.25%/quarter without fee*	10%/quarter without fee**
Millennium	5%/quarter	25% a quarter
Verition	8.33%/quarter	25%/quarter
Schorfheid	8.33%/quarter with lower fee	1 year lock
Hudson Bay	6.5%/quarter with fees of 1.75% and 20%***	25%/quarter with fees of 2% and 20%

- Previous history of Citadel limiting withdrawal/redemptions in 2008 <https://www.businessinsider.com/2008/12/citadel-refuses-to-give-investors-their-remaining-cash-back> + <https://www.reuters.com/article/citadelinvestment-idUSN1614248720090916/>
- Redditor analysis of Citadel loans - [https://www.reddit.com/r/Superstonk/comments/wuwg5f/shitadel\\_are\\_in\\_an\\_even\\_worse\\_financial\\_situation/](https://www.reddit.com/r/Superstonk/comments/wuwg5f/shitadel_are_in_an_even_worse_financial_situation/)

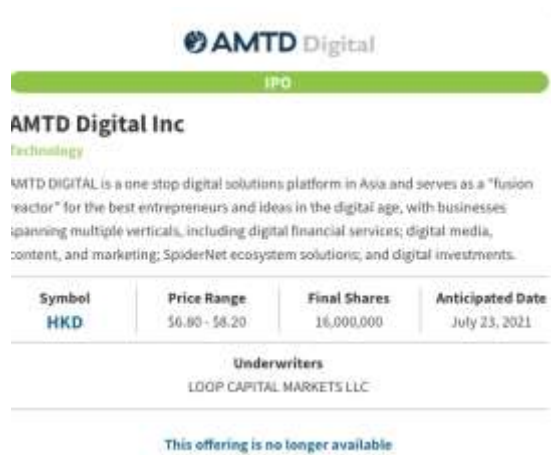
#### DISINGENUOUS PRICE ASSESSMENTS BY IN-HOUSE ANALYSTS TO PUSH SENTIMENT

- Anthony Chukumba – Loop Capital Broker-Dealer Analyst – Advises to ‘Sell the stock first, ask questions later’ – A ‘Sell-side’ analyst that consistently shares negative sentiment toward GME - <https://www.youtube.com/watch?v=0Sc8tIAhEEU> + <https://www.cnbc.com/2021/09/09/sell-the-stock-first-ask-questions-later-loop-capitals-chukumba-on-gamestop.html>
  - Other remarks from analyst include:
    - GameStop ‘worth \$10 at most’ Feb 2021 <https://www.cnbc.com/video/2021/02/25/gamestops-stock-worth-ten-dollars-at-the-most-analyst.html> + <https://www.youtube.com/watch?app=desktop&v=v2E8ZocpJfw&t=32s>
    - Claiming to cease covering GameStop / any memestock due to irrational analysis Jan 2021 (despite frequently offering opinion throughout 2021-2022)

- <https://au.finance.yahoo.com/finance/news/i-will-never-cover-game-stop-stock-ever-again-top-analyst-173202488.html> +
- <https://finance.yahoo.com/news/analyst-on-game-stop-volatility-if-you-want-to-gamble-go-to-the-casino-191750672.html>
- 'Completely disconnected from fundamentals' – Jan 2021  
<https://au.news.yahoo.com/finance/news/game-stop-has-been-a-debacle-of-epic-proportions-analyst-171133390.html>
  - Note – Loop Capital does not have to disclose positions publicly as fund falls below 13F requirements - <https://www.sec.gov/edgar/browse/?CIK=0001038016> + [https://www.sec.gov/Archives/edgar/data/1038016/000103801621000001/xslX-17A-5\\_X01/primary\\_doc.xml](https://www.sec.gov/Archives/edgar/data/1038016/000103801621000001/xslX-17A-5_X01/primary_doc.xml)
  - Loop Capital - Underwriter for HKD – Chinese stock that had unbelievable stock price rise at IPO (>32,000% Price rise - \$7.8 -> \$2521.72/sh, became 14th most valuable company in the world by market cap at time of IPO - \$425billion on \$25mil annual revenue – Bigger than Coca Cola, Costco & Bank of America!), now only \$3.44/sh – At time of IPO July 2022 Loop-capital received Green-shoe options for underwriting IPO = 2.4million shares at \$7.80 each (price rose to \$2521.72/sh by August 2022) = \$19 million valued up to \$6billion post IPO <https://www.loopcapital.com/article/loop-capital-markets-participates-as-joint-bookrunner-on-initial-public-offering-of-amtd-international-inc/> + <https://markets.businessinsider.com/news/stocks/amtd-digital-hkd-stock-price-ipo-chinese-tech-retail-traders-2022-8?amp> + [https://www.reddit.com/r/Superstonk/comments/wepi5q/loop\\_capital\\_the\\_underwriter\\_is\\_about\\_to\\_make\\_6b/](https://www.reddit.com/r/Superstonk/comments/wepi5q/loop_capital_the_underwriter_is_about_to_make_6b/)

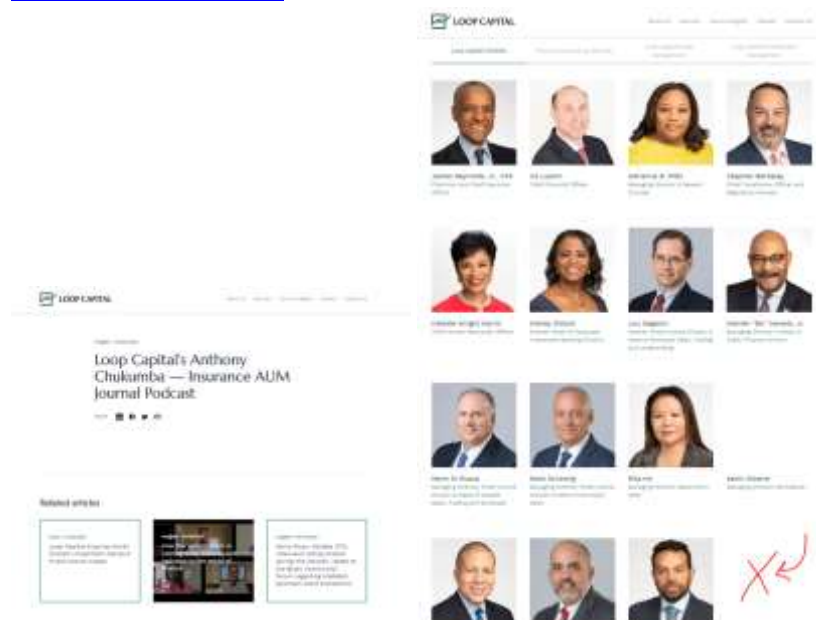


- HKD IPO'd with vague descriptions of business – 'digital solutions platform', 'SpiderNet ecosystem solutions' 'Digital investments' + only 51 employees + no financial statements <https://www.amtdigital.net/> + [https://www.reddit.com/r/Superstonk/comments/wdzaxg/hkd\\_a\\_chinese\\_ticker\\_2mmonth\\_revenue\\_no\\_history/](https://www.reddit.com/r/Superstonk/comments/wdzaxg/hkd_a_chinese_ticker_2mmonth_revenue_no_history/)



This offering is no longer available

- o Anthony Chukumba removed from Loop Capital website during timeframe of HKD IPO (Note Chukumba’s Podcast still present on website) [https://www.reddit.com/r/Superstonk/comments/10478mm/anthony\\_chukumba\\_removed\\_from\\_loop\\_capitals/](https://www.reddit.com/r/Superstonk/comments/10478mm/anthony_chukumba_removed_from_loop_capitals/)



- o Upstart (UPST) Stock hyped by Financial analyst Mark Minervini live on CNBC – analyst recommends buying however is unable to answer what the company does & fakes cut out – Sept 2021 - Soon afterward stock dropped significantly (>95%) suggestive of Pump & Dump [https://www.reddit.com/r/Superstonk/comments/q9msww/dude\\_pumping\\_stocks\\_on\\_cnb\\_c\\_is\\_asked\\_what\\_the/](https://www.reddit.com/r/Superstonk/comments/q9msww/dude_pumping_stocks_on_cnb_c_is_asked_what_the/) + [https://www.youtube.com/watch?v=E\\_YIZyVzYmA](https://www.youtube.com/watch?v=E_YIZyVzYmA) + [https://www.reddit.com/r/Superstonk/comments/v2oc87/hey\\_sec\\_maybe\\_you\\_can\\_help\\_mark\\_minervini\\_learn/](https://www.reddit.com/r/Superstonk/comments/v2oc87/hey_sec_maybe_you_can_help_mark_minervini_learn/) + <https://twitter.com/EnronChairman/status/1449124094755184645> + <https://finance.yahoo.com/quote/UPST/>



- Wedbush analysts – Frequently shares negative sentiment regarding GameStop – e.g. <https://investorplace.com/2024/03/wedbush-just-cut-its-price-target-on-gamestop-gme-stock/> - claims ‘demise of meme stock coming’ & price target of \$5.60 + <https://www.marketwatch.com/story/gamestops-new-investment-policy-alarming-and-inane-says-wedbush-f5d6a1bf> - ‘GameStop’s new investment policy “alarming” and “inane” says Wedbush’
  - Charged by SEC 2021 for unlawful unregistered distribution of nearly 100 million shares of 50 different low-priced microcap companies & failed to file suspicious activity reports <https://www.sec.gov/news/press-release/2021-261>
- Baird investment bank – Ceases coverage on GameStop citing lack of plan & unpredictable redditors - <https://www.cnbc.com/2021/06/28/baird-suspends-gamestop-stock-coverage-reddit-influence-lack-of-plan.html>
  - History of SEC Charges for Conflicts of interest (2012-2018) & receives commissions via PFOF from Citadel [https://www.reddit.com/r/Superstonk/comments/o9ss1m/yes\\_we\\_all\\_saw\\_baird\\_suspended\\_gamestop\\_coverage/](https://www.reddit.com/r/Superstonk/comments/o9ss1m/yes_we_all_saw_baird_suspended_gamestop_coverage/) + <https://www.sec.gov/files/litigation/admin/2019/ia-5148.pdf> + <https://content.rwbaird.com/RWB/Content/PDF/Help/606-Disclosure.pdf>

**Summary**

1. These proceedings arise out of breaches of fiduciary duty and inadequate disclosures by registered investment adviser Robert W. Baird & Co. Incorporated in connection with its mutual fund share class selection practices and the fees it and its associated persons received pursuant to Rule 12b-1 under the Investment Company Act of 1940 (“12b-1 fees”). At times during the period January 1, 2014 to March 31, 2018 (the “Relevant Period”), Respondent purchased, recommended, or held for advisory clients mutual fund share classes that charged 12b-1 fees instead of lower-cost share classes of the same funds for which the clients were eligible. Respondent and its associated persons received 12b-1 fees in connection with these investments. Respondent failed to disclose in its Form ADV or otherwise the conflicts of interest related to its charging of 12b-1 fees, and/or its selection of mutual fund share classes that pay such fees. During the Relevant Period, Respondent and its associated persons received 12b-1 fees for advising clients to invest in or hold such mutual fund share classes.

2. Respondent self-reported to the Commission the violations discussed in this Order pursuant to the Division of Enforcement’s (the “Division”) Share Class Selection Disclosure Initiative (“SCSD Initiative”).<sup>1</sup> Accordingly, this Order and Respondent’s Offer are based on the information self-reported by Respondent.

**Respondent**

3. Respondent Robert W. Baird & Co. Incorporated, headquartered in Milwaukee, Wisconsin, has been duly registered with the Commission as an investment adviser and broker-dealer since 1971. In its Form ADV filed November 1, 2018, Respondent reported regulatory assets under management of approximately \$132,486,000,627 as of December 31, 2017.

**Mutual Fund Share Class Selection**

4. Mutual funds typically offer investors different types of shares or “share classes.” Each share class represents an interest in the same portfolio of securities with the same investment objective. The primary difference among the share classes is the fee structure.

5. For example, some mutual fund share classes charge 12b-1 fees to cover fund distribution and sometimes shareholder service expenses. These recurring fees, which are included in a mutual fund’s total annual fund operating expenses, vary by share class, but typically range

<sup>1</sup> The findings herein are made pursuant to Respondent’s Offer of Settlement and are not binding on any other person or entity in this or any other proceeding.

<sup>2</sup> See Div. of Enforcement, U.S. Sec. & Fin. Comm.’s, Share Class Selection Disclosure Initiative: <https://www.sec.gov/files/litigation/admin/2019/ia-5148.pdf>, last modified Feb. 11, 2019.



content.rwbaird.com / Help / PDF

**Disclosure of Material Aspects of Venue Relationships - Baird**

Options: Baird receives certain payments on retail option orders routed to Citadel Securities. The...

- Curtis Nagle – Analyst for Bank of America – Frequently sets negative sentiment for GME, classifying GME investors as young & poor, using stimulus checks – States GME only valued at \$10/sh <https://markets.businessinsider.com/news/stocks/gamestop-is-losing-its-stimmy-support-analyst-says-1030228258>
  - Claims to cease coverage of GameStop analysis in June 2021 <https://edition.cnn.com/2021/06/04/investing/gamestop-bed-bath-beyond-meme-stocks/index.html>

### MULTIPLE ARTICLES USED TO IMPLY CORRELATION TO PRICE ACTION DESPITE OCCURRING PRIOR I.E. RC BABA PURCHASE

- RC BABA - WSJ Article written 16/1/23 states RC purchases BABA – however purchases had occurred in prior year as per “people familiar with the matter”, uses associated news to correlate with sudden stock price increase in BABA. Stock price then plummets in following month.



<https://www.wsj.com/articles/activist-investor-ryan-cohen-takes-stake-in-alibaba-and-pushes-for-more-stock-buybacks-11673886440> (Archived before edits <https://archive.md/pNri4> )

By Lauren Thomas

(New York) — Activist investor Ryan Cohen has built a stake in Alibaba Group Holding Ltd. worth hundreds of millions of dollars and is probably pushing the Chinese e-commerce giant to accelerate and further boost its share repurchase program, according to people familiar with the matter.

Mr. Cohen, known as the meme-stock king for helping ignite explosive rallies in GameStop Corp. and others, built his stake in the second half of last year, the people said.

While the stake is small in comparison to Alibaba's market capitalization of nearly \$300 billion, Mr. Cohen has a wide following among individual investors who often follow his lead.

Mr. Cohen, with a net worth of over \$2.5 billion and a portfolio of stocks including Apple Inc. as well as Wells Fargo & Co. and Onigroup Inc., first contacted Alibaba's board in August to express his view that the company's shares are deeply undervalued based on his belief that it can achieve double-digit sales and nearly 20% free-cash-flow growth over the next five years, the people said.

### FINANCIAL MEDIA UTILISED TO SMEAR RELEVANT PARTIES TO GME MOVEMENT - RYAN COHEN (LARGEST GME SHAREHOLDER & LATER CHAIRMAN/CEO), WES CHRISTIAN CALLED LOONEY BY FORBES FOR INVESTIGATING NAKED SHORTING, CARL ICAHN 70% SHARE DROP AFTER HINDENBURG SHORT REPORT

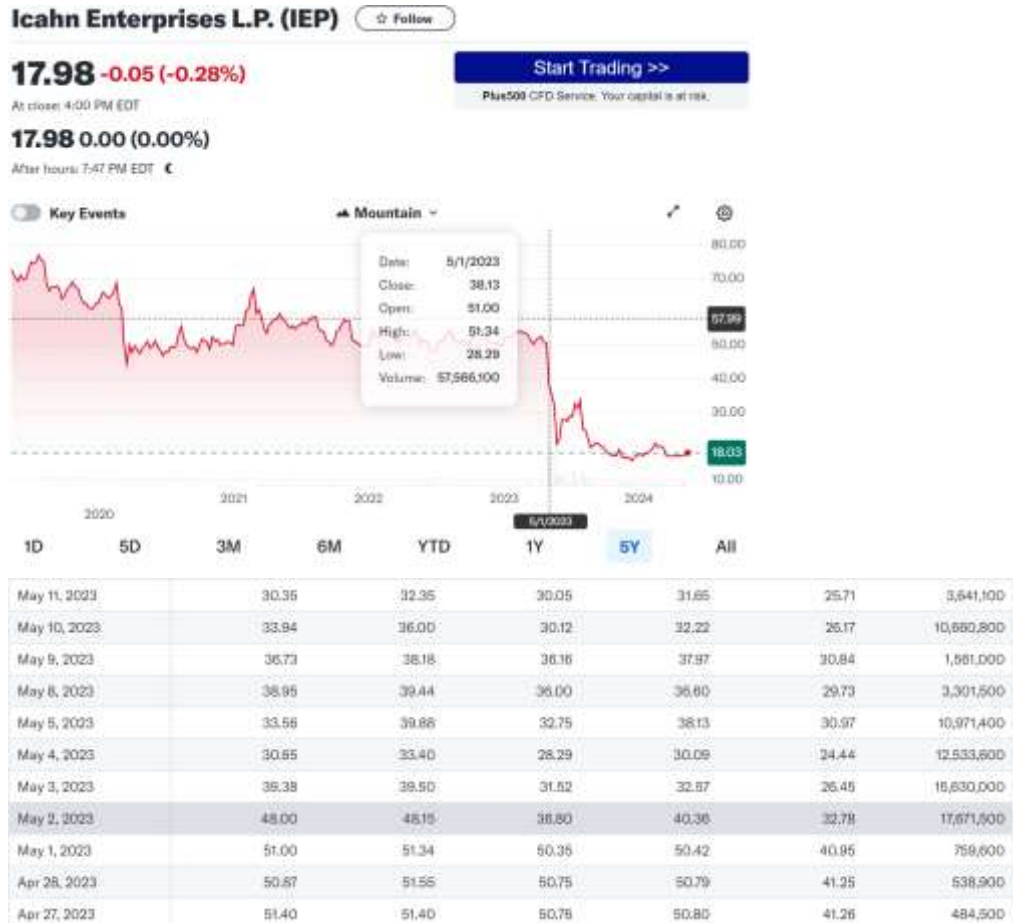
- Ryan Cohen – Labelled as meme king / meme baron / meme investor – undermining the aspect of Ryan Cohen as a successful start-up CEO of Chewy and long term value investor & activist (largest

individual shareholder in Apple & was an activist investor enacting change on a poorly performing GameStop prior to any 'memestock' event)

- Meme King Documentary - A documentary directed by CNBC on 6/6/23  
<https://www.youtube.com/watch?v=kzoSpRNobhl>
- Melissa Lee used as 'expert opinion' – CNBC Host of Fast Money – frequently seen berating 'memestock' investors i.e. GME investors
  - Actively dismisses positive sentiment
    - GameStop General counsel states RC has made company profitable after several years of near bankruptcy – Melissa Lee dismisses by saying 'yeah, they cut costs, they shut stores. They made profits that way. Revenue is down so their sales are down"
- Articles naming Ryan as a meme \_\_\_\_ (small sample)
  - Meme King Ryan Cohen Now Able to Trade Stocks with GameStop Funds  
<https://www.benzinga.com/analyst-ratings/analyst-color/23/12/36142175/meme-king-ryan-cohen-now-able-to-trade-stocks-with-gamestop-funds>
  - Cohen At it again as Meme King sends Nordstrom stock surging  
<https://www.forbes.com/sites/markfaithfull/2023/02/06/cohen-at-it-again-as-meme-king-sends-nordstrom-stock-surging/?sh=9213e6a35ca2>
  - GameStop's Ryan Cohen Wants to be More than a Meme-Stock King  
<https://www.wsj.com/articles/gamestops-ryan-cohen-wants-to-be-more-than-a-meme-stock-king-11668834015>
  - 'I have faith in him': Retail traders rally behind meme baron Ryan Cohen  
<https://www.ft.com/content/891e8c35-6abf-400e-837b-3c0c6bfb6532>
- Wes Christian – Forbes article released on 22/6/22 calling Wes Christian a 'looney', in the same week Meta Materials (MMTLP) hires Wes Christian & associated law firm to investigate naked short selling. <https://www.forbes.com/sites/brandonkochkodin/2023/06/22/the-loony-conspiracy-theory-threatening-wall-street/?sh=2654d4c84ba1>
  - Article is filled with heavy negative associations, arrogant statements and jovial dismissal of Wes Christians claims
    - "Looney Conspiracy", "Secretive puppeteers", "Great narrative", "Shadowy network", "laughably absurd", "People like Christian aren't funny. Just as lies about things like vaccines and elections and cabals", "Markets are rigged zeal of the Occupy Wall Street days, with the absolutism, ignorance and digital tools of QAnon", "Struggling for reasons that trees don't actually grow to the sky", "stirring the pot", "naked short selling boogeyman", "uncritical TV documentaries", "shaking his fist at the heavens", "comes across as a disappointed coach", "blame GameStop", "Pegged it as a sure loser", "working in cahoots", "organized buying sprees", "make grandiose promises, fail to deliver next", "as with most conspiracy theorists, Christian has walked into some dark, murky corners. He sat for interviews numerous times with ... a Holocaust denier who claimed NASA had a colony on Mars populated by kidnapped children turned into slaves (Um, this is not true)", "junk like this", "red herring", "Crusade", "It's al talk. It's not real" from Adam Aron (likely compromised CEO)
    - "Doubtful that naked short-selling even exists anymore" – refer to extensive naked short selling section & market maker exemption to legally naked short sell in RegSHO. Note market makers are the largest market participants today and processing the majority of trades in the stock market.

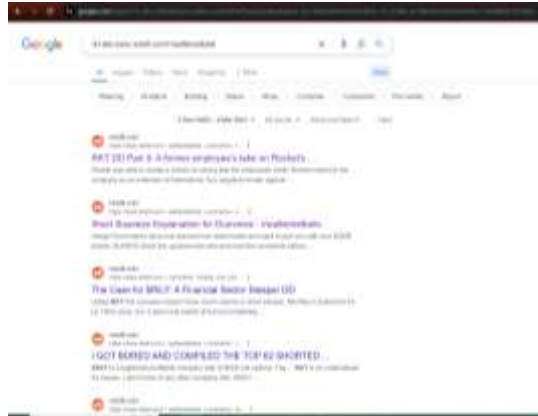


- Carl Icahn – Hindenburg report released on 2/5/23 claiming Carl Icahn is actively elevating IEP Share price by issuing disproportionate dividends of which he owns 85% issued shares & converts dividend into shares rather than cash, limiting the cash required to offer the dividend. Claims is ‘Ponzi like’ as using funds of new investors to pay dividends of old investors. Hindenburg announces a short position against IEP. <https://hindenburgresearch.com/icahn/>
  - Hindenburg is an activist short selling investment research firm – notably provided a report on Adani resulting in significant share price drop
  - The Hindenburg report is used as justification to heavily short IEP, with a share price drop of over 70% after report release (despite Icahn owning >85% of shares, daily volume exceeds 17,000,000)



**MSM AT TIME OF SQUEEZE SUGGESTING REDDITORS MOVED TO OTHER STOCKS**

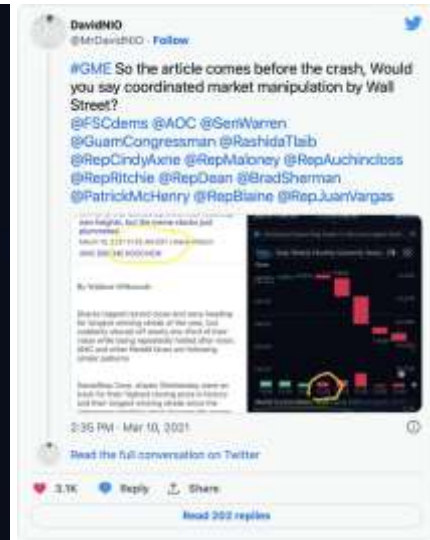
- Note – other tickers suggested in same timeframe including via MSM incl \$RKT + Silver
  - \$RKT article attributing price rise to WSB (Note very limited RKT posts on reddit until 2/3/23 – date of article) <https://www.cnbc.com/2021/03/02/shares-of-rocket-companies-a-large-short-target-by-hedge-funds-jump-more-than-20percent.html>
  - \$RKT Megathread started only on 2/3/23 [https://www.reddit.com/r/wallstreetbets/comments/lw6hoh/rkt\\_megathread\\_for\\_marc\\_h\\_2nd\\_2021/?sort=top](https://www.reddit.com/r/wallstreetbets/comments/lw6hoh/rkt_megathread_for_marc_h_2nd_2021/?sort=top)
  - Screenshot of only 1 DD series, no other posts for RKT prior to 2/3/23



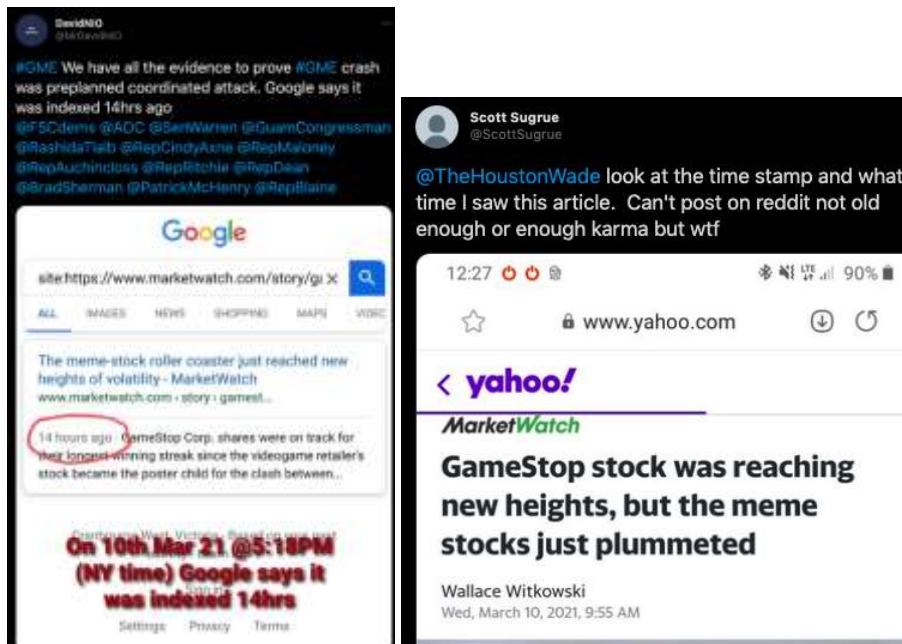
- \$SLV ETF/Futures suggested as next target of WSB as per MSM
  - <https://www.bloomberg.com/news/newsletters/2021-02-01/gamestop-gme-is-old-news-after-reddit-discovers-silver-futures-kkmtv8bh> + <https://sg.news.yahoo.com/silver-to-the-moon-says-redditor-but-others-on-wall-street-bets-differ-160221386.html> + <https://coingape.com/silver-slv-short-squeeze-begins-jp-morgan-holds-largest-short-positions/>
    - Evid of article documenting unusual uptick in Silver / Bot posts on WSB that was not consistent with the actual activity present
      - <https://www.businessofbusiness.com/articles/wallstreetbets-media-silver-squeeze-wasnt-happening-GME/>

**MULTIPLE ARTICLES STATING DROP / RISE IN PRICE MINUTES PRIOR TO PRICE ACTION TAKES PLACE I.E. MAR 10 CNBC/MARKETWATCH PREDICTS 40% PRICE DROP PRIOR TO OCCURRING**

- <https://www.cnbc.com/2021/03/10/gamestop-surges-40percent-then-wipes-out-gain-completely-and-is-halted-again.html> (Archived version on Mar 10 21 before further editing - <https://archive.md/TUvO3>)



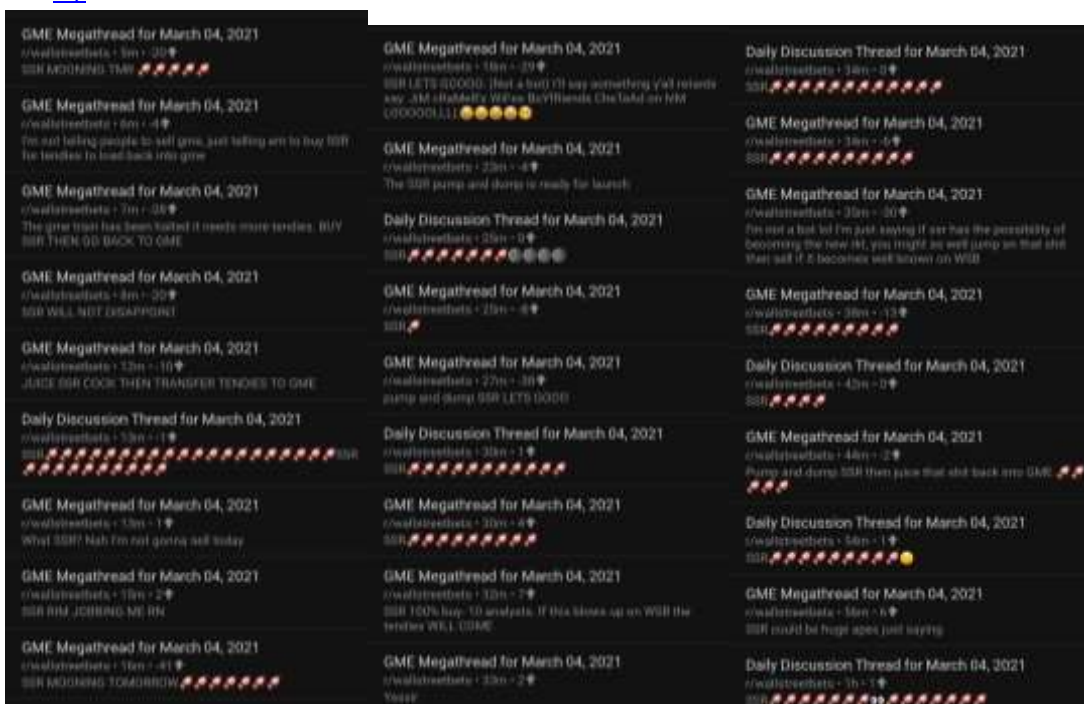
- o <https://www.marketwatch.com/story/gamestop-stock-was-reaching-new-heights-but-shares-in-the-meme-stocks-just-plummeted-11615398208>
- o Evid other users notice article indexed & released before price action (indexed 15hours prior, released 9:55AM, Price action 1230-1:30pm)



- [https://www.reddit.com/r/GME/comments/m27ejc/twitter\\_user\\_spots\\_an\\_article\\_about\\_gme/](https://www.reddit.com/r/GME/comments/m27ejc/twitter_user_spots_an_article_about_gme/)
- Video of March 10 Live with price action <https://www.youtube.com/watch?v=Er8o6nD3rT4>

**BOT ACTIVITY ON SOCIAL MEDIA SUGGESTING ALTERNATIVE TICKERS – NOTE REDDITORS BEGAN TO NOTICE UNUSUAL ACTIVITY WHEN BOTS STARTED TO HYPE TICKER \$SSR AFTER FREQUENT POSTS ABOUT SHORT SALE RESTRICTION (ABBREVIATED AS SSR ON REDDIT) – AS A RESULT REDDITOR BEGAN CREATING POSTS WITH KEYWORDS WRITTEN IN CAPITALS TARD / ASS / CUM LEADING TO ACTIVE BOT ACTIVITY SUGGESTING TICKERS \$TARD / \$ASS / \$CUM TO CLEARLY IDENTIFY BOTS**

- Evid of redditor screenshotting bot activity in WSB Megathread mistaking SSR for \$SSR [https://www.reddit.com/r/GME/comments/lxo166/wsb\\_shill\\_bots\\_think\\_ssr\\_is\\_a\\_ticker\\_and\\_a\\_re/](https://www.reddit.com/r/GME/comments/lxo166/wsb_shill_bots_think_ssr_is_a_ticker_and_a_re/)



- Megathread with SSR bots  
[https://www.reddit.com/r/wallstreetbets/comments/lxkint/gme\\_megathread\\_for\\_march\\_04\\_2021/](https://www.reddit.com/r/wallstreetbets/comments/lxkint/gme_megathread_for_march_04_2021/)
- Megathread created to catch bots on 5/3/21 after noticing on 4/3/21  
[https://www.reddit.com/r/wallstreetbets/comments/lybo9p/ass\\_cum\\_and\\_ssr\\_megathread\\_for\\_march\\_5th\\_2021/](https://www.reddit.com/r/wallstreetbets/comments/lybo9p/ass_cum_and_ssr_megathread_for_march_5th_2021/)
- Evid of redditor noticing uptick of bot related posts relating to manufactured tickers  
[https://www.reddit.com/r/GME/comments/ly5mnd/ok\\_whats\\_up\\_with\\_these\\_post\\_with\\_cum\\_ass\\_tard/](https://www.reddit.com/r/GME/comments/ly5mnd/ok_whats_up_with_these_post_with_cum_ass_tard/) +  
[https://www.reddit.com/r/GME/comments/ly6r4r/what\\_is\\_up\\_with\\_the\\_obvious\\_bot\\_mega\\_thread\\_about/](https://www.reddit.com/r/GME/comments/ly6r4r/what_is_up_with_the_obvious_bot_mega_thread_about/) + Megathread  
[https://www.reddit.com/r/GME/comments/lxrml0/cum\\_megathread/](https://www.reddit.com/r/GME/comments/lxrml0/cum_megathread/)

**INFILTRATED SOCIAL MEDIA & ATTEMPTED COUP OF MODERATORS TO LIMIT ENGAGEMENT & CONTROL NARRATIVE VIA CENSORING & MISINFORMATION, AGGRESSIVE DISMISSAL OF INFORMATION, EMOTIONAL MANIPULATION - HYPE CYCLES / IMPLICATION / PEER CONSENSUS FLOODING / DISRUPT & SEGREGATE CONVERSATION / FALSE FLAGS / FORUM SLIDE / INCONSISTENT RULES APPLIED BY MODS/REDDIT ADMINS**

- Attempted coups
  - OG WSB moderators previously inactive, actively remove other moderators & insert new moderators in secret whilst gaslighting users/mods, articles arise stating OG Moderator is paid for perspective in Netflix movie, ultimately active mods reinstated after reddit admins intervene
    - Summary Post (Best)  
[https://www.reddit.com/r/SubredditDrama/comments/lcaede/rwallstreetbets\\_is\\_being\\_taken\\_over\\_from\\_inactive/](https://www.reddit.com/r/SubredditDrama/comments/lcaede/rwallstreetbets_is_being_taken_over_from_inactive/)
    - Summary video (Includes all images)  
<https://www.youtube.com/watch?v=ATEn3cm7Us4> (Archived  
<https://web.archive.org/web/20210212110616/https://www.youtube.com/watch?v=ATEn3cm7Us4>)
    - Active mods summary  
[https://www.reddit.com/r/wallstreetbets/comments/lc6hmq/rwallstreetbets\\_will\\_die\\_soon\\_unless\\_the\\_admins/](https://www.reddit.com/r/wallstreetbets/comments/lc6hmq/rwallstreetbets_will_die_soon_unless_the_admins/) +  
[https://www.reddit.com/r/wallstreetbets/comments/lcvluc/an\\_update\\_on\\_the\\_ws\\_b\\_coup\\_d%C3%A9tat/](https://www.reddit.com/r/wallstreetbets/comments/lcvluc/an_update_on_the_ws_b_coup_d%C3%A9tat/)
  - Migration from WSB -> r/GME due to constantly berating comments regarding GME/ call to previous WSB culture
  - (Migration to controlled sub by compromised moderators) GME Moderators claimed to be compromised after u/redchessqueen & u/rensole & u/WardenElite(Discord) were removed as moderators without notice & 2 new mods added -> Redditors at the time trusted rensole & WardenElite as they were regular contributors to sub -> Due to prior compromised mods in WSB, redditors follow u/redchessqueen & u/rensole to 'newly' created sub r/Superstonk sub leading mass migration (Note Superstonk sub created 3 weeks Mar 23 2021 prior to removal of moderators)
    - Summary & Redditor notices mods removed -  
[https://www.reddit.com/r/GME/comments/mk9cc8/rensole\\_and\\_redchessqueen\\_99\\_no\\_longer\\_mods/](https://www.reddit.com/r/GME/comments/mk9cc8/rensole_and_redchessqueen_99_no_longer_mods/)
    - GME Mods response  
[https://www.reddit.com/r/GME/comments/mkaobg/announcement\\_on\\_the\\_rece](https://www.reddit.com/r/GME/comments/mkaobg/announcement_on_the_rece)

- [nt\\_moderation\\_team/](#) (Note Rensole 'accidentally' sends an @all message to all discord members alerting about removal of moderator privileges)
  - Rensole response  
[https://www.reddit.com/r/Superstonk/comments/mkgomd/synopsis\\_of\\_0504/](https://www.reddit.com/r/Superstonk/comments/mkgomd/synopsis_of_0504/)
  - RedChessqueen Response  
[https://www.reddit.com/r/Superstonk/comments/mk849y/comment/gteu12b/?utm\\_medium=android\\_app&utm\\_source=share&context=3](https://www.reddit.com/r/Superstonk/comments/mk849y/comment/gteu12b/?utm_medium=android_app&utm_source=share&context=3)
  - Later discovered summary of deception by Rensole + Redchessqueen including discord chat transcripts (Note – Superstonk created prior to drama, red+rensole removed themselves from mod list, chats suggesting nuclear option of migration prior to event, suspicious mod activity immediately prior instigating mod drama, GME mod confirm this)  
[https://www.reddit.com/r/Superstonk/comments/ombmj8/i\\_smell\\_bullshit/](https://www.reddit.com/r/Superstonk/comments/ombmj8/i_smell_bullshit/) + <https://imgur.com/a/M9XbVC2>
  - Further summary post identifying Rensole suspicious activity  
[https://www.reddit.com/r/GME/comments/mtyjbi/superstonk\\_is\\_sus\\_an\\_investigation\\_into/](https://www.reddit.com/r/GME/comments/mtyjbi/superstonk_is_sus_an_investigation_into/) (Archived - <https://archive.md/MSTt7> + <https://archive.md/GurCk> + <https://archive.md/hu3im> )
  - WardenElite Suspicious  
[https://www.reddit.com/r/GME/comments/mhzwgw/whether\\_you\\_like\\_it\\_or\\_not\\_warden\\_is\\_the\\_new/](https://www.reddit.com/r/GME/comments/mhzwgw/whether_you_like_it_or_not_warden_is_the_new/)
- u/rensole actively creates summary posts omitting key info daily, users identify trend and call out ultimately leading to a forced ban on Superstonk
  - Post by redditor noticing unusual subtle activity from 3 key mods involved in migration to Superstonk -  
[https://www.reddit.com/r/GME/comments/omeb9e/gmes\\_gambit\\_how\\_we\\_were\\_almost\\_all\\_fooled\\_by/](https://www.reddit.com/r/GME/comments/omeb9e/gmes_gambit_how_we_were_almost_all_fooled_by/)
  - Further summary post identifying Rensole suspicious activity  
[https://www.reddit.com/r/GME/comments/mtyjbi/superstonk\\_is\\_sus\\_an\\_investigation\\_into/](https://www.reddit.com/r/GME/comments/mtyjbi/superstonk_is_sus_an_investigation_into/) (Archived - <https://archive.md/MSTt7> + <https://archive.md/GurCk> + <https://archive.md/hu3im> )
- u/redchessqueen later found adding multiple new moderators with no significant/relevant history including u/heymadie -> events conspire resulting in moderator chats being exposed to user showing deranged & power hungry comments from redchessqueen + heymadie identified creating negative sentiment -> resultant user uproar and banning of redchessqueen & heymadie + exodus of users (chat exposed partially by pinkcatsonacid who was actively dismissed by other moderators -> splintered & formed r/GMEJungle) + old r/GME mods exposed manipulative chats from redchessqueen & rensole
  - Reddit post instigating banning of redchess queen -  
[https://www.reddit.com/r/Superstonk/comments/olmzqe/remove\\_redchessqueen\\_and\\_hey\\_madie\\_from\\_mod\\_list/](https://www.reddit.com/r/Superstonk/comments/olmzqe/remove_redchessqueen_and_hey_madie_from_mod_list/)
  - Redchessqueen 'accidentally' deleting viral post exposing inconsistency of Robinhood CEO comments during hearing  
[https://www.reddit.com/r/GME/comments/n92t2w/if\\_you\\_didnt\\_think\\_redchessqueen99modssuperstonk/](https://www.reddit.com/r/GME/comments/n92t2w/if_you_didnt_think_redchessqueen99modssuperstonk/)
  - Suspicious activity summary of redchessqueen <https://archive.md/hu3im>
- Creation of r/DRSurGME after active censorship of Plan vs DRS debate & banning of u/millertime & u/lawsondt from Superstonk -> Redditors begin migrating to r/DRSurGME

-> As user count was increasing, Banned by reddit admins after claim of harassment of other sub mods (ie Platinumsparkles)

- Unfortunately most of sub content (DRSurGME) especially around ban has been deleted & not archived, there were several posts by moderators showing transcripts with reddit admins regarding implementation of removal of user mentions/other subreddit crossposts feature prior to and request by admins to cease 'brigading' & harassment with no response after requesting clarification from moderators. Similarly multiple posts by moderators reiterating to not engage in brigading/harassment prior to ban.
- Redditors discovering Millertime banned for 'Spam' (for commenting on how to Direct register on posts) – as per compromised mods, always able to appeal ban (to the very same mods)  
[https://www.reddit.com/r/Superstonk/comments/wb3ofb/umillertime1216\\_has\\_been\\_banned/?rdt=45455](https://www.reddit.com/r/Superstonk/comments/wb3ofb/umillertime1216_has_been_banned/?rdt=45455)
- Evidence of banning directed by Platinum (Compromised) – Note key terms 'transparency' & high user approval praising mods & transparency (?manufacturing consent)  
[https://www.reddit.com/r/Superstonk/comments/wczhxl/transparency\\_regarding\\_umillertime1216s\\_ban/](https://www.reddit.com/r/Superstonk/comments/wczhxl/transparency_regarding_umillertime1216s_ban/)
- Rebuttal from millertime (states only 2 'warnings', not dozens of times as per platinum)  
[https://www.reddit.com/user/millertime1216/comments/wb4qlg/warnings\\_by\\_mods/](https://www.reddit.com/user/millertime1216/comments/wb4qlg/warnings_by_mods/)
- Reddit ban visible <https://www.reddit.com/r/DRSurGME/>
- Second sub formed post DRSurGME ban also banned by reddit admins  
[https://www.reddit.com/r/GME/comments/14gdlijg/the\\_new\\_drs\\_gme\\_sub\\_was\\_banned\\_again/](https://www.reddit.com/r/GME/comments/14gdlijg/the_new_drs_gme_sub_was_banned_again/) (Note users mention concern as other subs including pornography violence are not banned)
- Creation of r/ThePPShow after heavy negative sentiment shared in r/BBBY & r/Superstonk, primarily offered freedom of speech & lack of censorship, similarly banned with increasing user count under guise of harassment & brigading
  - Unfortunately most of sub content (r/ThePPShow) especially around ban has been deleted & not archived, there were several posts by moderators showing transcripts with reddit admins regarding implementation of removal of user mentions/other subreddit crossposts feature prior to and request by admins to cease 'brigading' & harassment with no response after requesting clarification from moderators. Similarly multiple posts by moderators reiterating to not engage in brigading/harassment prior to ban.
  - Reddit ban visible <https://www.reddit.com/r/theppshow/>
  - ppShow Moderator tweet regarding Reddit admin ban  
[https://twitter.com/the\\_travis\\_b13/status/1727018553130582302](https://twitter.com/the_travis_b13/status/1727018553130582302)
  - ppShow Livestream day prior Ban (21/11/23) – Conversation at 2:45:00  
<https://www.youtube.com/watch?v=eMoTgCRrlbY> (Evid of reddit admins claiming harassment/brigading, mods reiterating not to participate & no activity seen on subreddit)
  - ppShow Livestream on Ban day (22/11/23) -  
[https://www.youtube.com/watch?v=4ect\\_IQ8awI](https://www.youtube.com/watch?v=4ect_IQ8awI)
  - Redditors noticing r/thePPshow ban  
[https://www.reddit.com/r/BBBY/comments/180posy/theppshow\\_subreddit\\_was\\_banned/](https://www.reddit.com/r/BBBY/comments/180posy/theppshow_subreddit_was_banned/)

[taken\\_down\\_heres\\_where\\_we/](#)

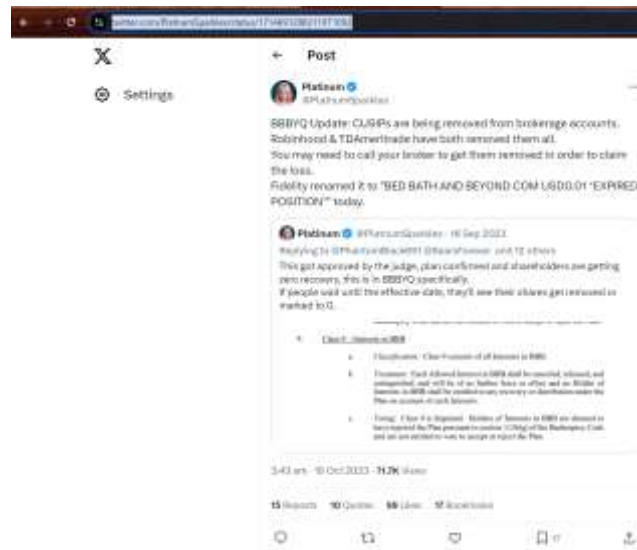
[https://www.reddit.com/r/superstonkuk/comments/180nxlp/the\\_ppshow\\_has\\_been\\_banned/](https://www.reddit.com/r/superstonkuk/comments/180nxlp/the_ppshow_has_been_banned/)

[https://www.reddit.com/r/BBBY/comments/180mcr4/the\\_ppshow\\_sub\\_got\\_banned/](https://www.reddit.com/r/BBBY/comments/180mcr4/the_ppshow_sub_got_banned/)

- Refer to PPSHOWBan folder for twitter screenshots – Shortdestroyer (Twitter) claims responsibility for take down of subreddit -> Berates PPSHOW members & Pulte -> Pulte threatens defamation -> Shortdestroyer backpedals & offers apologies, offers to reinstate subreddit (Note subreddit was not reinstated)
  - <https://twitter.com/pulte/status/1729518862318579881> +
  - <https://twitter.com/shortdestroyer/status/1729604941281362260>
- Implementation of 'AI' Mod 'SATORI' – claimed by compromised moderators as method of removing bots/spam, suspicious that such a highly sophisticated AI was created by 2 moderators on reddit in free time, suspect a Subreddit scrapper
  - Redditor banned by compromised mod for asking about Satori
    - [https://www.reddit.com/r/Superstonk/comments/nruy5r/renhill\\_why\\_did\\_you\\_ban\\_a\\_superstonk\\_user\\_within/](https://www.reddit.com/r/Superstonk/comments/nruy5r/renhill_why_did_you_ban_a_superstonk_user_within/)
- u/Platinumsparkles – suspicious moderator covertly added by compromised moderators, initially very infrequent poster with very minimal contribution to subreddit, active twitter with provocative selfies & minimal DD, after sudden appearance actively participated in Superstonk AMAs frequently inaccurately framing questions, pinning negative sentiment comments to top of posts (first comment visible to users) or actively dismissing new ideas i.e. Direct registering / differentiating plan vs DRS vs Directstock/BBBY & RC / MMTLP Halt, actively utilised reddit admins to ban 2 alternative subreddits for intentionally provoked 'harassment' (r/DRSUrGME + r/ThePPSHOW), ultimately stepped down 2024 after constant user feedback stating clear ulterior motives however remains moderator
  - A lot of direct evidence of banning difficult to identify as Generic Modbot was active & banned users had posts deleted/removed however was source of 'harassment' in 2 banned subreddits and precipitant of banning millertime/lawsondt/houstonwade & several other dissenting users (As above/below), often first to dissuade discussion with pinned posts (MMTLP Halt / Plan vs Book), instigated banning of any mention of MMTLP/BBBY on Superstonk
  - Redditor calling out PlatinumSparkles (Note user comments agreeing with multiple of them banned)
    - [https://www.reddit.com/r/houstonwade/comments/1ai7rp0/platinumsparkles\\_im\\_calling\\_you\\_out/?rdt=37375](https://www.reddit.com/r/houstonwade/comments/1ai7rp0/platinumsparkles_im_calling_you_out/?rdt=37375)
    - <https://www.youtube.com/watch?v=BmQQOBVoxtc>
  - PlatinumSparkles post suggesting to keep 1 share in Plan if 'switched to book' – later found that any plan share or purchase plan or enrolment in DRIP causes automatic enrolment in DSPP that is held at custodian of Computershare at DTCC rather than direct ownership (entire reason for switching to 'book') (Note – users calling out subtle deception)
    - [https://www.reddit.com/r/Superstonk/comments/zd7rgq/if\\_you\\_recently\\_switched\\_from\\_plan\\_to\\_book\\_please/](https://www.reddit.com/r/Superstonk/comments/zd7rgq/if_you_recently_switched_from_plan_to_book_please/)
  - Platinumsparkles comment on MMTLP situation actively dismissing events, originally pinned as top comment but later removed after user uproar
    - [https://www.reddit.com/r/Superstonk/comments/1ahuip4/comment/kogpgxg/?share\\_id=dlybLSaglOmGyb23AfHYa&utm\\_content=2&utm\\_medium=android\\_app&utm\\_name=androidcss&utm\\_source=share&utm\\_term=1](https://www.reddit.com/r/Superstonk/comments/1ahuip4/comment/kogpgxg/?share_id=dlybLSaglOmGyb23AfHYa&utm_content=2&utm_medium=android_app&utm_name=androidcss&utm_source=share&utm_term=1)



- PlatinumSparkles dismissing BBBY investors in debate with Jake2B however ultimately not knowledgeable on topic  
<https://open.spotify.com/episode/5KC3MUABQh1t8p8tPXsRe?si=Wjr4uDL4Qn6TUCbadtnDmg>  
<https://twitter.com/sboho/status/1722659853573738499?s=20>
- PlatinumSparkles encouraging users to call & delete cancelled BBBY shares during CH11 – in event of emergence from bankruptcy with some recovery (cash/equity etc) this would remove brokers obligations to deliver to these investors  
<https://twitter.com/PlatinumSparkles/status/1714691298311971092>



- Slow insertion of moderators without user input despite claiming as such, actively created drama and segregated moderators in chats leading to slow exodus of old trusted moderators (see above insertion of rensole/redchessqueen/WardenElite/PlatinumSparkles/Crybad/Goldielips/HalfDane)
- Move from banning users as directed by a specific moderator to a generic 'Superstonk Mod Team' / 'Superstonk QV' to prevent users identifying bad actors
  - Evid Generic ban (refer to above posts for mod specific bans used prior)  
[https://www.reddit.com/r/Superstonk/comments/zfemok/mods\\_should\\_moderate\\_not\\_control\\_the\\_narrative/](https://www.reddit.com/r/Superstonk/comments/zfemok/mods_should_moderate_not_control_the_narrative/)
- Hype cycles (Followed with significant price decline)
  - Quad Witching Day (19/3/21 – suspected to increase 15/3/23 onwards)  
[https://www.reddit.com/r/GME/comments/ltua0n/endgame\\_dd\\_how\\_last\\_weeks\\_actions\\_all\\_come/](https://www.reddit.com/r/GME/comments/ltua0n/endgame_dd_how_last_weeks_actions_all_come/)

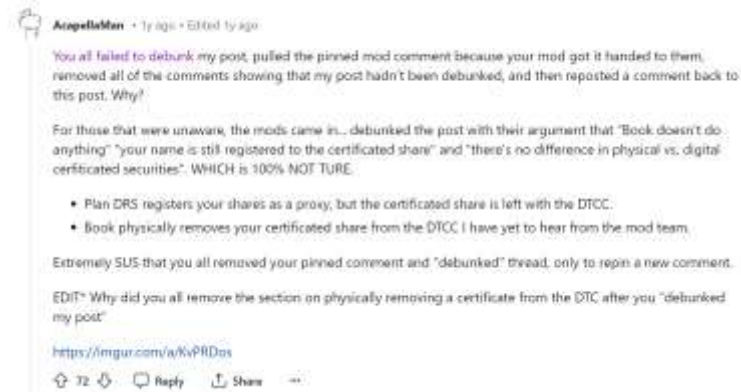


- T+35 / T+21 etc  
[https://www.reddit.com/r/Superstonk/comments/nf22qz/theory\\_on\\_the\\_ftd\\_loop\\_mising\\_link\\_a\\_t35\\_surge/](https://www.reddit.com/r/Superstonk/comments/nf22qz/theory_on_the_ftd_loop_mising_link_a_t35_surge/)
- Earning/Annual Shareholder meetings
  - 1<sup>st</sup> annual shareholder 9/6/21

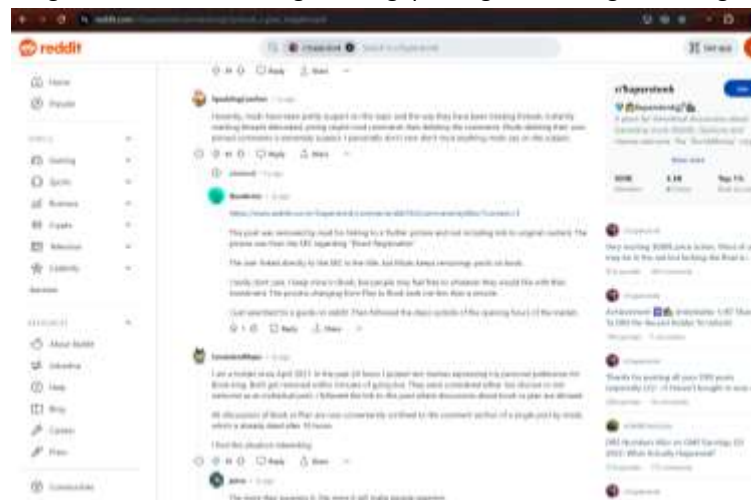


- Disrupt & Segregate conversation
  - Subreddit had additional precautions placed by reddit admins due to ‘brigading’ as per compromised mods leading to inability to mention reddit users by username or mentioning other subreddits in any form of text or imagery despite being core sharing mechanism offered by reddit (the website often reminds users to share using naming user/subreddit feature despite subreddit specific restrictions)  
[https://www.reddit.com/r/Superstonk/comments/15lp5gd/we\\_lost\\_our\\_appeal\\_to\\_restore\\_user\\_tags/](https://www.reddit.com/r/Superstonk/comments/15lp5gd/we_lost_our_appeal_to_restore_user_tags/) +  
[https://www.reddit.com/r/Superstonk/comments/1336ri9/censorship\\_mods\\_r\\_sus\\_and\\_brigading/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=ioscss&utm\\_content=2&utm\\_term=1](https://www.reddit.com/r/Superstonk/comments/1336ri9/censorship_mods_r_sus_and_brigading/?utm_source=share&utm_medium=ios_app&utm_name=ioscss&utm_content=2&utm_term=1) +  
[https://www.reddit.com/r/Superstonk/comments/o80eky/no\\_brigading/](https://www.reddit.com/r/Superstonk/comments/o80eky/no_brigading/) +  
[https://www.reddit.com/r/Superstonk/comments/t8edq1/we\\_have\\_a\\_lot\\_of\\_eyes\\_on\\_this\\_sub\\_right\\_now/](https://www.reddit.com/r/Superstonk/comments/t8edq1/we_have_a_lot_of_eyes_on_this_sub_right_now/) +  
[https://www.reddit.com/r/Superstonk/comments/zoa6ed/brief\\_community\\_update\\_tagging\\_users/](https://www.reddit.com/r/Superstonk/comments/zoa6ed/brief_community_update_tagging_users/) +  
[https://www.reddit.com/r/Superstonk/comments/zh4eqd/attention\\_superstonk/](https://www.reddit.com/r/Superstonk/comments/zh4eqd/attention_superstonk/)
  - Karma restrictions & Age restrictions placed to prevent bots & young age accounts from engaging  
[https://www.reddit.com/r/Superstonk/comments/od4ai9/power\\_to\\_the\\_apes\\_emergency\\_karmaage\\_restrictions/](https://www.reddit.com/r/Superstonk/comments/od4ai9/power_to_the_apes_emergency_karmaage_restrictions/)
  - When Plan vs Book Debate occurring on Superstonk, compromised moderators were unsuccessful in outright censoring all conversation -> alternative tactic was to pin moderator comment (first comment seen by users) stating no difference between Plan vs Book & lock post or flair debunked then directed all further conversation to a Plan vs Book Megathread, however megathread was not pinned on sub thus almost impossible to find without link, limiting visibility to only the poster (Unusual as most megathreads are pinned to sub). The megathread was filled with information on how plan & book shares are essentially the same, actively sidestepping the subtleties between the two such as Plan is held as custodian at DTCC vs Book (w/out Directstock) which is purely under ownership of the investor.
    - Example reddit post – debunked -> undebunked after user uproar + pinned megathread (Note user is angry in comments of megathread)  
[https://www.reddit.com/r/Superstonk/comments/zjo7u3/book\\_vs\\_plannedi\\_did](https://www.reddit.com/r/Superstonk/comments/zjo7u3/book_vs_plannedi_did)

[the\\_digging\\_so\\_you\\_didnt/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=iossmf](https://www.reddit.com/r/Superstonk/comments/zih2vl/evidence_straight_from_computershare_that/?utm_source=share&utm_medium=ios_app&utm_name=iossmf)



- Another example reddit post – debunked -> directed to megathread [https://www.reddit.com/r/Superstonk/comments/zih2vl/evidence\\_straight\\_from\\_computershare\\_that/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=iossmf](https://www.reddit.com/r/Superstonk/comments/zih2vl/evidence_straight_from_computershare_that/?utm_source=share&utm_medium=ios_app&utm_name=iossmf) (Archived)
- Segregated Megathread with ‘no difference’ as main point (Note other users comments on how posts were deleted or locked & segregated to this megathread) [https://www.reddit.com/r/Superstonk/comments/zizcty/book\\_v\\_plan\\_megathread/](https://www.reddit.com/r/Superstonk/comments/zizcty/book_v_plan_megathread/) (Prev archived with some deleted comments <https://archive.md/g9DiZ>)
- Megathread - user noticing banning, pinning, debunking & moving to megathread



- Ultimately moderators changed tact as users continued to call out behaviour -> leading to active and heavy banning of users mentioning Book as more beneficial than plan shares -> leads to formation of r/DRSurGME and exodus of active users -> superstonk mods claim harassment to reddit admins and leads to shutdown of r/DRSurGME
- Peer consensus flooding
  - Utilising bots to manufacture consent
    - i.e. Superstonk mods (compromised) attempt to reinstate Rensole (compromised mod) with initial barrage of positive sentiment comments within 2 hours with high upvotes, as 24hours passed and real active users engaged with post all initial posts were heavily downvotes & user uproar prevented rensola from participating again in sub [https://www.reddit.com/r/Superstonk/comments/133mm8l/welcome\\_to\\_dd\\_spo\\_tlight\\_week/](https://www.reddit.com/r/Superstonk/comments/133mm8l/welcome_to_dd_spo_tlight_week/) +

[https://www.reddit.com/r/Superstonk/comments/134hlhx/daily\\_stonk\\_for\\_01052023/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=ioscss&utm\\_content=2&utm\\_term=1](https://www.reddit.com/r/Superstonk/comments/134hlhx/daily_stonk_for_01052023/?utm_source=share&utm_medium=ios_app&utm_name=ioscss&utm_content=2&utm_term=1)

- False flags
  - Compromised mods claiming harassment to target alternative subreddits ultimately leading to deletion/permanent banning of subreddit (unusual as these subreddits are comparatively harmless compared to some ongoing active subreddits that actively participate in pornography / violence i.e. combat footage / harassment of other subs such as gmemeltdown – created solely for harassing GME investors)
- Forum slide
  - Using short phrases that users continue to chain on i.e. DRS is the way / HODL – each user comments a single letter in the chain – H then next user O then next user L etc. This leads to top comments being filled with useless comments diminishing engagement or discussion of post
  - Forming phrases such as ‘Too Ape Didn’t Read’ / ‘Ape can’t read’ / ‘Doesn’t matter BUY HODL DRS’ / ‘Ape Zen’ / ‘So I’ll just DRS’ as top comments, encouraging users to skip reading post or cutting conversation by actively dismissing content
- Inconsistent rules applied by mods/reddit admins
  - Subreddit had additional precautions placed by reddit admins due to ‘brigading’ as per compromised mods, leading to inability to mention reddit users by username or mentioning other subreddits in any form of text or imagery despite being core sharing mechanism offered by reddit (the website often reminds users to share using naming user/subreddit feature despite subreddit specific restrictions)
    - [https://www.reddit.com/r/Superstonk/comments/15lp5gd/we\\_lost\\_our\\_appeal\\_to\\_restore\\_user\\_tags/](https://www.reddit.com/r/Superstonk/comments/15lp5gd/we_lost_our_appeal_to_restore_user_tags/) +
    - [https://www.reddit.com/r/Superstonk/comments/1336ri9/censorship\\_mods\\_r\\_sus\\_and\\_brigading/?utm\\_source=share&utm\\_medium=ios\\_app&utm\\_name=ioscss&utm\\_content=2&utm\\_term=1](https://www.reddit.com/r/Superstonk/comments/1336ri9/censorship_mods_r_sus_and_brigading/?utm_source=share&utm_medium=ios_app&utm_name=ioscss&utm_content=2&utm_term=1) +
    - [https://www.reddit.com/r/Superstonk/comments/o80eky/no\\_brigading/](https://www.reddit.com/r/Superstonk/comments/o80eky/no_brigading/) +
    - [https://www.reddit.com/r/Superstonk/comments/t8edq1/we\\_have\\_a\\_lot\\_of\\_eyes\\_on\\_this\\_sub\\_right\\_now/](https://www.reddit.com/r/Superstonk/comments/t8edq1/we_have_a_lot_of_eyes_on_this_sub_right_now/) +
    - [https://www.reddit.com/r/Superstonk/comments/zoa6ed/brief\\_community\\_update\\_tagging\\_users/](https://www.reddit.com/r/Superstonk/comments/zoa6ed/brief_community_update_tagging_users/) +
    - [https://www.reddit.com/r/Superstonk/comments/zh4eqd/attention\\_superstonk/](https://www.reddit.com/r/Superstonk/comments/zh4eqd/attention_superstonk/)
  - Evid feature suggested to moderators
    - [https://www.reddit.com/r/Superstonk/comments/zuqulz/so\\_what\\_exactly\\_is\\_brigading\\_these\\_tools\\_are\\_all/](https://www.reddit.com/r/Superstonk/comments/zuqulz/so_what_exactly_is_brigading_these_tools_are_all/)
  - Additional precautions by reddit admins were also placed on r/DRSurGME and r/ThePPShow shortly before permanently banning/deleting both subreddits

**MMTLP – PREMATURELY FORCED CLOSED TRADING 2 DAYS EARLY BY FINRA, DESPITE STATEMENT BY FINRA IN 12HOURS PRIOR STATING TRADING WILL CEASE ON THE CORRECT SCHEDULED DAYS. EARLY FORCE CLOSE PREVENTED SHORT CLOSING. NEW CONVERTED SHARE HAVE BEEN DELAYED >2YEARS & DELISTED. WES CHRISTIAN OBTAINED EMAILS WITH CORRESPONDENCE BETWEEN FINRA & SEC REGARDING MMTLP. MMTLP ORIGINALLY NOT TRADEABLE, STARTED TRADING BY ENTITIES NOT INVOLVED WITH MMTLP AS PER CEO**

- MMTLP created 28/6/21 to provide preferred stock dividends to TRCH shareholders after MMAT (Meta Materials) & TRCH (Torchlight Energy Resources) merger

<https://www.sec.gov/Archives/edgar/data/1431959/000119312521203407/d189140dex991.htm>

- MMTLP was not intended to be tradeable as per TRCH CEO John Brda, states did not apply to make MMTLP tradeable with OTC Markets, forms submitted to FINRA filled with fraudulent information that he notified OTC Markets/FINRA, OTC Markets stated MMTLP already approved & ignored request to rectify <https://www.youtube.com/watch?v=befDS9mA3lg>
  - 4 months later, without our knowledge or approval, and using fraudulent information, MMTLP (Series A Pref) starts trading on the gray sheets on the OTC Market – Oct. 7, 2021
    - This validates that the shorts were held through the merger and were looking for shares to buy so that they could deliver the Ser A Pref dividend
    - Information used for the 211 was from 2012 and listed me as the President and all info is wrong – **fraudulent**
      - I requested that OTC markets take it down as it was fraudulent, and they said FINRA approved it at the request of 2 MMs and we are not going to fix it
      - I said the company had no involvement in listing this and they said MMs can do this away from the company
      - OTC has exposure I believe as well
    - Market makers were Canaccord Genuity and GTSM (Ari Rubenstein's company)
    - Stock trades pretty good volume but retail is very confused, no one knows it this is legitimate
    - Some retail sell their shares and no longer have rights to the Spin out
  - We announce that the company is going to do a spin out and we go about registering the spinout shares with the SEC
    - SEC with attorneys input recommends that we register shares and;
    - Spin out the company into a private company that does not trade
      - Therefore, no Cusip and no DTCC eligibility
  - Retail, instead of selling, realizes that they can buy MMTLP and get the spinout. Volume picks up
  - As S1 process proceeds, FINRA is put on notice a good 60 days prior to getting S1 approved
    - Stock continues to move up
  - S1 gets approved and now FINRA is only hold up
  - 424 is filed with dates for Record Date (Dec. 12) and Distribution date (Dec. 14)
  - FINRA finally approves with extremely vague language
- Market Makers GTSM (gtsx.com) + Canaccord Genuity apply to OCC (Options Clearing subsidiary of DTC) to trade options on MMTLP prior to date of merger (21/6/21)
  - <https://infomemo.theocc.com/infomemos?number=48884> + approved 25/6/21
  - <https://infomemo.theocc.com/infomemos?number=48904>

 <p><b>THE FOUNDATION FOR SECURE MARKETS</b></p>	<p>#48884</p>	 <p><b>THE FOUNDATION FOR SECURE MARKETS</b></p>	<p>#48904</p>
<p><b>Date:</b> June 21, 2021</p> <p><b>Subject:</b> Torchlight Energy Resources, Inc. – Distribution Option Symbol: TRCH New Symbol: TRCH1 Date: 6/20/21</p>		<p><b>Date:</b> June 25, 2021</p> <p><b>Subject:</b> Adjusted Torchlight Energy Resources, Inc. - Further Adjustment Adjusted Option Symbol: TRCH1 New Adjusted Option Symbol: MMAAT1 Date: 6/24/21</p>	
<p><b>Background</b></p> <p>Torchlight Energy Resources, Inc. (TRCH) has announced a distribution of Series A Preferred Shares (Series A Preferred Shares). The distribution ratio is 1 Series A Preferred Share for each TRCH share held. The record date is June 24, 2021. The payable date is June 28, 2021. The dividend is set for June 23, 2021 as the ex-dividend date for the distribution.</p> <p>The trading status for Series A Preferred Shares is not yet known. For the TRCH Proxy Statement dated May 5, 2021 and Red May 7, 2021, it is not expected that the Series A Preferred Shares will be listed on a national securities exchange.</p> <p><b>Possible Settlement Procedures</b></p> <p>OCC anticipates that if an OTC or OTCBB (Rule 15c2-11) market develops, OCC will accept transactions in the Series A Preferred Shares until after the close of trading and assignment activity. In that event, TRCH1 option exercise and assignment activity will settle in the normal fashion through OCC. However, if a market does not develop or OCC does not accept transactions in the Series A Preferred Shares, OCC anticipates requiring broker to broker settlement for TRCH1 options. Pursuant to customary OCC rules to govern settlement procedures, liability to affect delivery may subsequently occasion cash settlement as determined by OCC.</p> <p><b>Contract Adjustment</b></p> <p><b>Effective Date:</b> June 25, 2021</p> <p><b>Option Symbol:</b> TRCH1 changes to TRCH1</p> <p><b>Strike Price:</b> No Change</p> <p><b>Number of Contracts:</b> No Change</p> <p><b>Multiplier:</b> 100 (e.g., a premium of 1.50 yields \$150; a strike of 7.50 yields \$750.00)</p> <p><b>New Deliverable Per Contract:</b> 1) 100 Torchlight Energy Resources, Inc. (TRCH) Common Shares 2) 100 (New) Torchlight Energy Resources, Inc. Series A Preferred Shares (subject to delayed settlement until the trading status can be determined)</p>		<p>Adjusted Torchlight Energy Resources, Inc. (TRCH) options were adjusted on June 25, 2021 (See OCC Information Memo #48884). The new deliverable became 1) 100 Torchlight Energy Resources, Inc. (TRCH) Common Shares and 2) 100 Torchlight Energy Resources, Inc. Series A Preferred Shares (subject to delayed settlement until the trading status can be determined).</p> <p>Torchlight Energy Resources, Inc. (TRCH) has announced a 1-for-2 reverse stock split and a name, symbol, CUSIP change. As a result of the reverse stock split and underlying changes, each TRCH Common Share will be converted into the right to receive 0.5 (New) Meta Materials Inc. (MMAAT) Common Shares. The reverse stock split and underlying changes will become effective before the market open on June 28, 2021.</p> <p><b>Contract Adjustment</b></p> <p><b>Effective Date:</b> June 28, 2021</p> <p><b>Option Symbol:</b> TRCH1 changes to MMAAT1</p> <p><b>Contract Multiplier:</b> 1</p> <p><b>Strike Offset:</b> 1</p> <p><b>New Multiplier:</b> 100 (e.g., for premium of strike dollar extension 1.00 will equal \$100)</p> <p><b>New Deliverable Per Contract:</b> 1) 50 Meta Materials Inc. (MMAAT) Common Shares 2) 100 Torchlight Energy Resources, Inc. Series A Preferred Shares (subject to delayed settlement until the trading status can be determined)</p> <p><b>Settlement Allocation:</b> MMAAT: 50% Series A Preferred Shares: 50%</p> <p><b>CUSIPs:</b> MMAAT (New): 501349104 Series A Preferred Shares: TBD</p> <p><b>Delayed Settlement</b></p>	

- OCC become aware on 6/10/21 that MMTLP is not eligible for DTC or CNS System. Settles on a broker-broker basis <https://infomemo.theocc.com/infomemos?number=49379>



#49379

**Date:** October 06, 2021  
**Subject:** Adjusted Meta Materials Inc. – Further Adjustment  
 Adjusted Option Symbol: MMAT1  
 Date: 6/28/21  
 \*\*\* Update – Broker-to-Broker Settlement \*\*\*

Adjusted Meta Materials Inc. (formerly Torchlight Energy Resources, Inc.) MMAT1 options were adjusted on June 23, 2021 and again on June 28, 2021 (See OCC Memo #40884 and OCC memo #48904). The deliverable became 1) 50 Meta Materials Inc. (MMAI) Common Shares and 2) 100 Torchlight Energy Resources, Inc. Series A Preferred Shares. The Preferred Shares were subject to delayed settlement due to their unknown trading status.

On October 6, 2021, the Series A Preferred Shares began trading on an OTC market under the name Meta Materials Inc. and trading symbol "MMTLP". Additionally, OCC has been informed that the MMTLP shares are not eligible for CNS settlement.

**Broker-to-Broker Settlement**

Meta Materials Inc. (MMTLP) Series A Preferred Shares are not eligible for CNS settlement. Consequently, settlement of the MMTLP component of MMAT1 exercise/assignment activity from June 28, 2021 and thereafter will be subject to broker to broker settlement. All delayed settlement obligations related to the MMTLP component from June 28, 2021 through October 7, 2021 will no longer be delayed and will be subject to broker-to-broker settlement.

Pursuant to OCC By-Law Article VI, Section 18, OCC has determined that, effective with exercises of June 28, 2021 and thereafter, settlement of the MMTLP component of MMAT1 exercise and assignment activity shall settle on a broker-to-broker basis. Additionally, all delayed settlement obligations related to the MMTLP component from June 28, 2021 through October 7, 2021 will no longer be delayed and will also settle on a broker-to-broker basis. If it is not possible for the delivering Clearing Member to effect delivery of the MMTLP Series A Preferred Shares on the designated settlement date, then the settlement obligations of both delivering and receiving Members shall be delayed until such time as OCC designates a new exercise settlement date, settlement method and/or settlement value. This determination allows delivering Members the opportunity to effect settlement if they have MMTLP Series A Preferred Shares and are able to effect delivery but delays the settlement obligation when this is not possible. Both the delivering and receiving Clearing Members are required to immediately notify OCC if they are unable to effect settlement.

In determining that delivery of the MMTLP Series A Preferred Shares is in fact not possible in respect of a given exercise or assignment, OCC shall require an appropriate officer(s) of the delivering Clearing Member to represent in writing that delivery is not possible. (Upon exercise or assignment of MMAT1 options, OCC will contact each delivering Clearing Member to provide the specific requirements and procedures for such representation.) Pursuant to customary OCC broker to broker settlement procedures, inability to effect delivery may subsequently occasion cash settlement as determined by OCC.

- On 6/10/21 FINRA provides notice MMTLP is tradeable on OTC Markets on daily list - <https://otce.finra.org/otce/dailyList>

Details	
	Current Value
Daily List Date/Time	10/06/2021 09:27:52
Event Type	Addition
Effective/Ex Date/Time	10/06/2021 09:00:00
Issue Type	
Symbol	MMTLP
Issue Name	META MATERIALS INC PFD SARA
Class	
ADR Ratio	
Maturity Date	
Market Category	Other OTC
Offering Type	No Restrictions
OTC Responsible Party Flag	Yes
Unit of Trade	100
Regulatory Transaction Fee Flag	Yes
Daily List Comment	

- On 10/10/21 OCC revises – prior standing & states MMTLP now eligible for CNS Settlement via NSCC (National securities clearing subsidiary of DTC) <https://infomemo.theocc.com/infomemos?number=49388>



- On 23/11/23 - Meta Materials (NASDAQ:MMAT & FSE:MMAT) announced board had approved distribution to the holders of Series A non-voting Preferred stock (Trading OTC as MMTLP) of Next Bridge Hydrocarbon (NBH) Shares. On completion of distribution NBH common stock will not be publicly traded & not eligible for electronic transfer through DTC book entry or established clearing corporation - <https://metamaterial.com/meta-materials-inc-board-of-directors-approves-planned-completion-of-the-spin-off-of-next-bridge-hydrocarbons-inc/>
  - i.e. – Meta announced it was going private and converting all MMTLP (public) stock into NBH (private) stock & Cease public trading – 23/11/23
  - Filed with SEC on 18/11/22  
<https://www.sec.gov/Archives/edgar/data/1936756/000119312522257967/d302576ds1a.htm>
  - Process clearly defined in release – Record date of 4pm ET 12/12/22, on 14/12/22 after close will be distributed & all MTLP Shares will be cancelled.
  - Any sales on or before 12/12/22 will not be entitled to receive NBH (ie provision to allow closing of short sales)
  - Direct registered shareholders will be credited via transfer agent AST. 'Street name'/Beneficial owners will need to discuss with bank/broker as distributions will be given to DTC (intermediary) but would not be eligible for DTC's electronic book-keeping – Street name will have to request for bank/broker shares to be transferred to AST
    - The NBH shares do not have a CUSIP as not DTC eligible & held only at transfer agent
- On 6/12/22 after market close (3 weeks after notice & SEC approval, last 2 days before shares settle by record date) – FINRA processed & announced the above corporate action on the FINRA OTC daily list <https://otce.finra.org/otce/dailyList> - confirming Record date of 12/12/22, record date holders will exchange 1 MMTLP for 1 NBH on 14/12/22, purchases executed after 8/12/22 will not receive distribution & MMTLP shares will be cancelled 13/12/22  
<https://metamaterial.com/meta-materials-announces-finra-has-processed-corporate-action-for->

[exchange-of-series-a-preferred/](#)

MMTLP shareholders with settled positions as of 12/12/22 Record Date will receive one (1) share of Next Bridge Hydrocarbons, Inc. for every one (1) share of MMTLP held on Pay Date of 12/14/22. Purchases of MMTLP executed after 12/8/22 will not receive the distribution. Will not be quoted Ex. [NO EX-DIVIDEND DATE] MMTLP shares will be canceled effective 12/13/22.

Daily List Events						
Summary						
Date/Time	Event Type	Effective Date/Time	Symbol	Issue Name	Market	
12/06/2022 14:55:29	Exchanged	12/13/2022 00:00:00	MMTLP	META MATERIALS INC PFD SER A	OTC Equity	
Comments						
MMTLP shareholders with settled positions as of 12/12/22 Record Date will receive one (1) share of Next Bridge Hydrocarbons, Inc. for every one (1) share of MMTLP held on Pay Date of 12/14/22. Purchases of MMTLP executed after 12/8/22 will not receive the distribution. Will not be quoted Ex. MMTLP shares will be canceled effective 12/13/22.						
Details						
		Summary Value				
Daily List Date/Time	12/06/2022 14:55:29					
Event Type	Exchanged					
Effective Date/Time	12/13/2022 00:00:00					
Symbol	MMTLP					
Issue Name	META MATERIALS INC PFD SER A					
Class						
Market Category	OTC Equity					
Offering Type	No Restrictions					
Daily List Comment	MMTLP shareholders with settled positions as of 12/12/22 Record Date will receive one (1) share of Next Bridge Hydrocarbons, Inc. for every one (1) share of MMTLP held on Pay Date of 12/14/22. Purchases of MMTLP executed after 12/8/22 will not receive the distribution. Will not be quoted Ex. MMTLP shares will be canceled effective 12/13/22.					

- As per Meta Materials – disclosures & dates from FINRA supersedes & replaces Meta Materials announcements
  - o Further confirmed by Vice president of OTC Markets on 7/12/22 - <https://www.youtube.com/watch?v=OR5SA6UjhUM> (Note even states FINRA has given early notice of 1 week, where usually FINRA only gives notice of deletion on the day prior – “a week out is of the ordinary”)
  - o On 8/12/22 FINRA revises the corporate action with the following – Shareholders with settled positions on 12/12/22 will receive 1 NBH to 1 MMTLP. Purchases executed after 8/12/22 will not receive distribution. MMTLP will be deleted 13/12/22 & not be quoted. <https://metamaterial.com/meta-materials-announces-finra-has-revised-corporate-action-for-exchange-of-series-a-preferred/>

See Daily List of 12/6/2022. Announcement Revised: MMTLP shareholders with settled positions as of 12/12/22 will receive one (1) share of Next Bridge Hydrocarbons, Inc. for every one (1) share of MMTLP held. Purchases of MMTLP executed after 12/8/22 will not receive the distribution. Will not be quoted Ex. Symbol: MMTLP will be deleted effective 12/13/22.

- o Note – Distribution date is removed from notice
- o Initially FINRA notice on Daily list stated MMTLP will be ‘cancelled’ rather than ‘deleted’ (also mentioned in OTC Markets VP interview) – required second amendment to ‘deleted’



Date/Time	Event Type	Eff/Ex Date/Time	Symbol	Issue Name	Market
12/06/2022 14:53:29	Exchanged	12/13/2022 00:00:00	MMTLP	META MATLS INC PFD SER A	OTC Equity

Comments

MMTLP shareholders with settled positions as of 12/12/22 Record Date will receive one (1) share of Next Bridge Hydrocarbons, Inc. for every one (1) share of MMTLP held on Pay Date of 12/14/22. Purchases of MMTLP executed after 12/8/22 will not receive the distribution. Will not be quoted Ex. MMTLP shares will be cancelled effective 12/13/22.

Summary

Date/Time	Event Type	Eff/Ex Date/Time	Symbol	Issue Name	Market
12/08/2022 13:11:45	Exchanged	12/13/2022 00:00:00	MMTLP	META MATLS INC PFD SER A	OTC Equity

Comments

See Daily List of 12/6/2022. Announcement Revised: MMTLP shareholders with settled positions as of 12/12/22 will receive one (1) share of Next Bridge Hydrocarbons, Inc. for every one (1) share of MMTLP held. Purchases of MMTLP executed after 12/8/22 will not receive the distribution. Will not be quoted Ex. Symbol: MMTLP will be deleted effective 12/13/22.

- On 9/12/22 FINRA forced an unexpected cease to trading citing a U3 halt – 3 days earlier than scheduled, to continue until 13/12/22 – the date for deletion of MMTLP ticker - preventing the need for short positions & FTD to be closed <https://otce.finra.org/otce/tradingHalts>

Symbol	Issue Name	Market	Halt Code	OTC Equity	OTC List
MMTLP	META MATLS INC PFD SER A	OTC Equity	U3	Y	Y



**Attn: Trading and Market Making/Legal and Compliance/Operations/Systems**  
**UNIFORM PRACTICE ADVISORY (UPC # 35-22) 12/09/2022**

**Trading and Quotation Halt for META MATERIALS PFD SER A (MMTLP)**

Effective Friday, December 09, 2022, the Financial Industry Regulatory Authority, Inc. ("FINRA") halted trading and quoting in the Series A preferred shares of Meta Materials Inc. ("FINRA" Symbol: MMTLP). Pursuant to Rule 6440(a)(3), FINRA has determined that an extraordinary event has occurred or is ongoing that has caused or has the potential to cause significant uncertainty in the settlement and clearance process for shares in MMTLP and that, therefore, halting trading and quoting in MMTLP is necessary to protect investors and the public interest.

The trading and quoting halt will end concurrent with the deletion of the symbol effective Tuesday, December 13, 2022. See updated FINRA Daily List announcement of December 8, 2022, regarding MMTLP; available here: <https://otce.finra.org/otce/dailyList>.

See also Form S1 Registration Statement for Next Bridge Hydrocarbons, Inc. stating that "...immediately after the Spin-Off, all shares of Series A Non-Voting Preferred Stock of Meta shall be cancelled." Available here: <https://www.sec.gov/Archives/edgar/data/1936756/000119312522011275/d302576ds1a.htm>.

Questions regarding this notice can be directed to: FINRA Market Operations at (866) 776-0800, Option 2.

- U3 halt - Extraordinary event <https://www.finra.org/rules-guidance/notices/07-22>

<b>U3</b>	<p><b>Halt—Extraordinary Events</b></p> <p>Trading is halted because NASD has determined that an extraordinary event has occurred or is ongoing that has had a material effect on the market for the OTC Equity Security or has caused or has the potential to cause major disruption to the marketplace and/or significant uncertainty in the settlement and clearance process.</p>
-----------	--

- Has only been used on Domestic US stocks 3 times since 2014
- MMTLP had extensive Fail to delivers (FTD's) suggestive of naked shorting – evidenced by being on the OTC Threshold list for 42 days since Oct (42/60 days = 70%) <https://otce.finra.org/otce/otcThreshold>

Time	Side	Price	Quantity	Time	Side	Price	Quantity
01/12/2022 10:00:00	Bid	\$100.00	100	01/12/2022 10:00:00	Ask	\$100.00	100
01/12/2022 10:00:01	Bid	\$100.01	100	01/12/2022 10:00:01	Ask	\$100.01	100
01/12/2022 10:00:02	Bid	\$100.02	100	01/12/2022 10:00:02	Ask	\$100.02	100
01/12/2022 10:00:03	Bid	\$100.03	100	01/12/2022 10:00:03	Ask	\$100.03	100
01/12/2022 10:00:04	Bid	\$100.04	100	01/12/2022 10:00:04	Ask	\$100.04	100
01/12/2022 10:00:05	Bid	\$100.05	100	01/12/2022 10:00:05	Ask	\$100.05	100
01/12/2022 10:00:06	Bid	\$100.06	100	01/12/2022 10:00:06	Ask	\$100.06	100
01/12/2022 10:00:07	Bid	\$100.07	100	01/12/2022 10:00:07	Ask	\$100.07	100
01/12/2022 10:00:08	Bid	\$100.08	100	01/12/2022 10:00:08	Ask	\$100.08	100
01/12/2022 10:00:09	Bid	\$100.09	100	01/12/2022 10:00:09	Ask	\$100.09	100
01/12/2022 10:00:10	Bid	\$100.10	100	01/12/2022 10:00:10	Ask	\$100.10	100

- On day of halt (9/12/22) level 2 data showed price of MMTLP trading at >\$1000 (in MMTLP Folder) + Several retail investors orders executed on ETrade, one even receiving notifications in response to sale -  
<https://twitter.com/jchrste1112/status/1750233370678976672> +  
[https://twitter.com/Poseidon\\_360\\_/status/1750264485099511968](https://twitter.com/Poseidon_360_/status/1750264485099511968) +  
<https://twitter.com/JohnnyTabacco/status/1742657800092676170> +  
<https://twitter.com/HoganGeorgio/status/1750277292905898058>

**WiseGuyz** @WiseGuyz  
 \$35,000,000 GONE IN 60 SECONDS  
 BLOCKBUSTER INFO... So imagine you own approx 2000 shares of MMTLP  
 You have limit stop orders out etc.  
 You see MMTLP on level 2 showing prices \$1000-\$2000 pre market 12/9  
 You tell eTrade cancel your orders. They come back and say too late. WOW they actually send a Help Desk report saying SORRY ITS TOO LATE TO CANCEL. Your orders have already been executed. The Prints as shown below say you are now \$25M richer. Wow. And then Poof your trades are cancelled and your money is GONE. There were oh ayo printed after 12/9 and someone hit their pants. Reallll and weep. I got more. #COWapath #GunsAndPants #KarmaCollects #BullMarket #Investor @WiseGuyz @WiseGuyz

**James007** @chrste1112  
 #MMTLP @johnbrda @junkSavvy @rict7081915 @JohnnyTabacco @denrisknease  
 This my account that MM's colluded with E\*trade and rejected after a sell order was in process.

**E\*TRADE** Account: [redacted]  
 Orders: [table with columns: Order ID, Order Type, Price, Quantity, Status, Time, etc.]

**Help Center**  
 I have a question about my account. I need help with my orders.

**@Pocison\_368**  
 Same here - Almost my annual salary with one sell, and this was stolen from me.  
 When retail makes a bad trade, we take our loss. When HF's make a bad trade, they get bailed out.  
 They belong in prison, and we deserve our money.

Date	Order Type	Order type	Quantity	Symbol	Price type	Term	Price	Reasons
12/10/22	STK	Stock/ETF	Sell	120	MMTLP	Limit	505.00 - 905.00	Too Late To Cancel

Security: META MATERIALS INC PFD SER A (MMTLP)

7:20 am - 25 Jan 2024 - 443 Views

**Geo** @HoganGeorge  
 Same here... lost MILLIONS...

Order type	Quantity	Symbol	Price type	Term	Price	Reasons
MMTLP	400	MMTLP	Limit	GT 60	2,000.00	Too Late To Cancel
MMTLP	200	MMTLP	Limit	GT 60	2,000.00	Too Late To Cancel
MMTLP	200	MMTLP	Limit	GT 60	2,000.00	Too Late To Cancel
MMTLP	400	MMTLP	Limit	GT 60	2,000.00	Too Late To Cancel

8:22 am - 25 Jan 2024 - 584 Views

Order type	Quantity	Symbol	Price type	Term	Price	Reasons
Sell	3,570	MMTLP	Limit	GT 60	999.00	Too Late To Cancel
Sell	184	MMTLP	Limit	GT 60	2,400.00	Too Late To Cancel
Sell	700	MMTLP	Limit	GT 60	1,500.00	Too Late To Cancel
Sell	500	MMTLP	Limit	GT 60	500.00	Too Late To Cancel
Sell	300	MMTLP	Limit	GT 60	1,200.00	Market Reject
Sell	300	MMTLP	Limit	GT 60	800.00	Market Reject

Help Center  
 Too Late To Cancel  
 This request to cancel is rejected and the order is no longer able to be canceled. The order has already been executed or is in the process of executing.

**E\*TRADE**

Another E\*Trade account with the Too late to Cancel: "Executed or in the process of Execution"

Date	Order Type	Order type	Quantity	Symbol	Price type	Term	Price	Reasons
12/10/22	STK	Stock/ETF	Sell	400	MMTLP	Limit	800.00	Too Late To Cancel
12/10/22	STK	Stock/ETF	Sell	400	MMTLP	Limit	2,000.00	Too Late To Cancel
12/10/22	STK	Stock/ETF	Sell	200	MMTLP	Limit	1,800.00	Too Late To Cancel
12/10/22	STK	Stock/ETF	Sell	1,000	MMTLP	Limit	2,000.00	Too Late To Cancel
12/10/22	STK	Stock/ETF	Sell	400	MMTLP	Limit	2,000.00	Too Late To Cancel
12/10/22	STK	Stock/ETF	Sell	500	MMTLP	Limit	2,000.00	Too Late To Cancel
12/10/22	STK	Stock/ETF	Sell	400	MMTLP	Limit	800.00	Too Late To Cancel

Date	Order	Type	Order type	Quantity	Symbol	Price type	Term	Price	Reasons
12/10/22	1751	Stock/ETF	Sell	120	MMTLP	Limit	GT 60	505.00	Too Late To Cancel

Security: META MATERIALS INC PFD SER A (MMTLP)

Quantity	Symbol	Price type	Term	Price	Reasons
4,145	MMTLP	Limit	GT 60	1,500.00	Too Late To Cancel
5	MMTLP	Limit	GT 60	24,994.02	Too Late To Cancel
375	MMTLP	Limit	GT 60	9,896.24	Too Late To Cancel
250	MMTLP	Limit	GT 60	4,874.01	Too Late To Cancel
450	MMTLP	Limit	GT 60	2,479.49	Too Late To Cancel

- FOIA request revealed that SEC & FINRA were aware of the situation regarding MMTLP via ‘FINRA’S Market Fraud Investigations team’
  - They had ‘received several tips that appear to have also been sent to the SEC’ & MMTLP had ‘hit my fraud team’s radar screen (and seemingly a lot of other radar screens as well)’.



- FINRA had officially requested for bluesheets for MMTLP & MMAT during this timeframe (5/12/22)
  - Bluesheet – formal request from regulator for transaction records from market participants - <https://www.investopedia.com/terms/b/bluesheets.asp>
  - FINRA has continuously stonewalled information regarding the bluesheet when requested by several congress members – now considering a formal subpoena

From: Draddy, Sam <Sam.Draddy@finra.org>  
 Sent: Monday, December 5, 2022 9:07 AM  
 To: (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) @SEC.GOV>  
 Cc: (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) @SEC.GOV>; Boyle, Richard <Richard.Boyle@finra.org>; Libbon, Jay <Jay.Libbon@finra.org>  
 Subject: RE: Inquiry

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

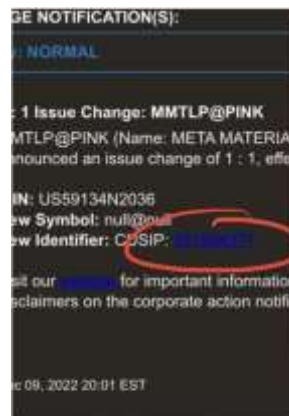
(b)(6); (b)(7)(C) looks like this MMAT/MMTLP matter has now hit my Fraud team's radar screen (and seemingly a lot of other radar screens as well). I know you have spoken to Patti Catimates and our General Counsel's office—but was wondering if it made sense for my Fraud team to have a conversation directly with you and your folks working on the matter so we are not duplicating efforts. We are looking at the two issuers from a fraud/manipulation angle and, in fact, bluesheeting both MMAT and MMTLP as we speak.

If you think a comparison of notes is worth a quick call—let me know a good day/time. I can set up a zoom and feel free to let me know if (b)(6); (b)(7)(C) or anyone else should be included.

Thanks (b)(6); (b)(7)(C)

Sam

- On 15/12/22 – Meta Materials announces the completion of distribution of NBH <https://metamaterial.com/meta-materials-completes-distribution-of-next-bridge-hydrocarbons-common-shares/>
- Despite the announcement several retail investors do not receive distribution on the 15/12/22
- DTCC provisions a 'liability CUSIP' to broker-dealers whilst the distribution is 'investigated'
  - Note – NBH should not have a CUSIP as it is not DTC eligible & held at transfer agent AST only
  - Retail investors receive emails from brokers stating new CUSIP for NBH shares held at broker-dealer



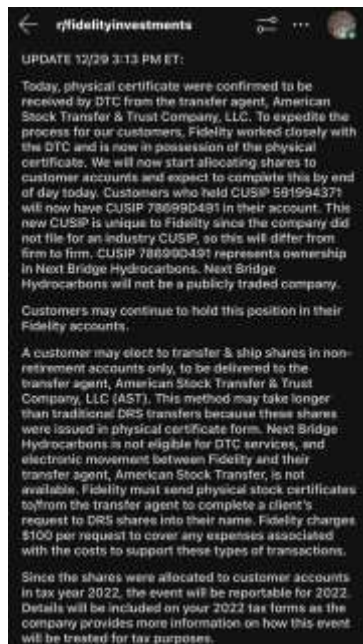
Reference: 7 - Issue Change: MMTLP@PINK  
 MMS 2022-12-09 20:01:13

MMTLP@PINK (Name: META MATERIALS, INC) announced an issue change of 1 : 1 effective 2022-12-01

ISIN: US559134N2036  
 New Symbol: null  
 New Identifier: CUSIP: 33204237

We'll see you soon for important information and disclosures on the corporate action notification process.

- Fidelity (Broker) claimed to offer Direct registration on 29/12/23 (after distribution) for a fee \$100 (Note DRS free for other stocks with Fidelity) – claiming due to receiving certificated stocks at distribution [https://www.reddit.com/r/NextBridgeHC/comments/zzd9ye/fidelity\\_is\\_going\\_to\\_charge\\_100\\_if\\_you\\_want\\_to/](https://www.reddit.com/r/NextBridgeHC/comments/zzd9ye/fidelity_is_going_to_charge_100_if_you_want_to/) + [https://www.reddit.com/r/MMTLP\\_/comments/107s4v6/message\\_from\\_fidelity\\_re\\_mmtlp/](https://www.reddit.com/r/MMTLP_/comments/107s4v6/message_from_fidelity_re_mmtlp/)



I am writing in response to your recent correspondence regarding Meta Materials Inc. Preferred Series A shares (formerly MMTLP) and Next Bridge Hydrocarbons.

Physical certificates were confirmed to be received by the Depository Trust Company (DTC) from the transfer agent, American Stock Transfer & Trust Company, LLC on December 29, 2022. Shareholders of Meta Materials Inc. Preferred Series A shares received the allocation of Next Bridge Hydrocarbons (CUSIP 78699D491) on that same date. CUSIP 78699D491 represents ownership in Next Bridge Hydrocarbons. As the company did not file for an industry CUSIP, this new CUSIP is unique to Fidelity. Next Bridge Hydrocarbons will not be a publicly traded company.

Shares held at Fidelity are registered in "street name." This means the name that appears on the stock or bond "certificate" is that of the broker, but the person who paid for the securities retains ownership rights. Shares purchased in a cash account, or a margin account without borrowing, are considered fully owned by the account owner. Fidelity does not lend out shares held in Cash accounts, or when no margin debit exists in a Margin account.

I regret your dissatisfaction related to this matter. Fidelity maintains that we acted in accordance with the terms of the reorganization. Fidelity meticulously follows reorganization instructions to ensure proper handling and has processes and procedures in place to fully comply with all laws and regulations applicable to our businesses, products, and services.

Please consult investor relations at Next Bridge Hydrocarbons for more information on your shares.

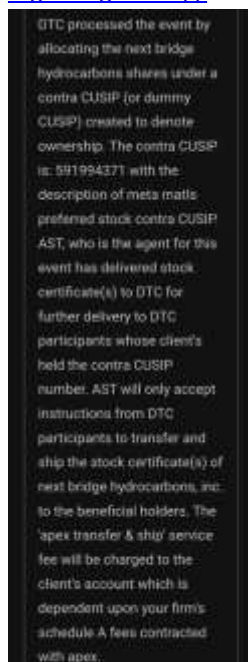
Sincerely,

Fidelity Investments

W696199-06JAN23

Clearing, custody or other brokerage services provided by National Financial Services LLC or Fidelity Brokerage Services LLC, Members NYSE, SIPC

- Provisioned a new CUSIP 78699D491 for NBH
- As per retail investors – Fidelity frequently did not honour the \$100 direct registration offer
- Sofi (Broker) – Requests \$50 fee as per clearing broker Apex – in email states DTC has processed by creating a 'Dummy' CUSIP  
[https://www.reddit.com/r/MMAT/comments/10aw8zz/just\\_got\\_this\\_email\\_from\\_sofi\\_regarding\\_mmtlp/](https://www.reddit.com/r/MMAT/comments/10aw8zz/just_got_this_email_from_sofi_regarding_mmtlp/)



- Schwab allegedly requesting for \$80 fee to transfer certificates as received 'Jumbo' certificates from distribution & would require cutting  
[https://www.reddit.com/r/MMTLP/comments/15j0stb/what\\_schwab\\_is\\_telling\\_me\\_re\\_ast\\_transfer/](https://www.reddit.com/r/MMTLP/comments/15j0stb/what_schwab_is_telling_me_re_ast_transfer/)
- Tradestation ceases transfer to AST due to insufficient shares as was not able to redeem lent out shares before receiving distribution from AST

We understand that some TradeStation customers may seek to participate in the non-transferable subscription rights offering for shares of common stock in the future subsidiary of Next Bridge Hydrocarbons, Inc. ("NBH"). Such participation requires NBH holders to register and record ownership of their NBH shares in book entry form with the transfer agent, the American Stock Transfer & Trust Company ("AST"). Registration must be completed within sixty (60) days (the "record date") from the effective date of a Form S-1 Registration Statement that NBH filed with the SEC on July 26, 2023. NBH will issue a press release notifying shareholders of the record date once the Registration Statement is declared effective by the SEC. TradeStation will be transmitting its requested list of clients' shares to AST, but will not be able to send any additional shares once that list has been sent.

Upon the initial distribution of NBH common stock, broker-dealers, like TradeStation, were granted physical certificates based on their customers' former holdings of Meta Materials ("MMTLP"). The NBH certificate that TradeStation received excluded a large number of NBH shares that had been lent to other broker-dealers as part of TradeStation's Fully Paid Lending program. Despite TradeStation's best efforts, we have been unable to recall a portion of the lent-out shares because there is currently no market for the security. This means that we will not be able to honor some of our customers' requests to register and record their ownership in book entry form with AST because the shares are not backed by a physical certificate. If the Registration Statement is declared effective by the SEC, TradeStation will fulfill its obligation to transfer the current list of clients who own NBH of record to AST. In the meantime, we must decline your request to transfer a physical certificate reflecting your ownership interest to AST.

- Meta Materials hired Wes Christian & related law firm to investigate & pursue suspected naked shorting & fraud in June 2023
  - On same week of announcement (27/6/22) of working with Meta Materials – Forbes releases derogatory article – ‘Wes Christian – The loony conspiracy theory threatening Wall Street’ (22/6/22)
    - <https://www.forbes.com/sites/brandonkochkodin/2023/06/22/the-loony-conspiracy-theory-threatening-wall-street/?sh=2654d4c84ba1>
- After investors sent over 40,000 letters – Representative Ralph Norman along with 70 members of Congress sent a letter 12/12/23 to FINRA & SEC for further clarification with a deadline of Jan 31 2024 <https://norman.house.gov/news/documentsingle.aspx?DocumentID=1785> + <https://norman.house.gov/uploadedfiles/rep-norman-mmtlp-letter-2023-12-22-final.pdf>
- In response FINRA returned the following <https://norman.house.gov/uploadedfiles/2024-01-31-finra-response-to-rep-norman-regarding-mmtlp.pdf> + <https://www.finra.org/investors/insights/FAQ-MMTLP-corporate-action-and-trading-halt> + <https://www.finra.org/investors/insights/supplemental-faq-mmtlp-corporate-action-and-trading-halt>
  - Note - SEC declined to respond to the letter by the deadline, however did initiate investigation on July 2023 into Meta Materials & CEO John Brda regarding merger with Torchlight (TRCH) – Wells notice given (In context of above appears retaliatory/malicious) <https://franknez.com/sec-is-now-investigating-meta-materials-former-and-current-ceos/> + <https://fintel.io/doc/sec-meta-materials-inc-1431959-8k-2023-july-25-19563-8548>
  - SEC released an ‘empty’ response 6 days on 7/2/24 as per Rep Norman – states cannot refer to any one case & requests to refer to FINRA – “requests for information sought by FINRA, and for analyses performed by FINRA, are best answered by FINRA”
    - <https://podcasts.apple.com/us/podcast/whats-bugging-me/id1657007934?i=1000643979541> + <https://twitter.com/RepRalphNorman/status/1754981831668007341>



February 6, 2024

The Honorable Ralph Norman  
U.S. House of Representatives  
569 Cannon House Office Building  
Washington, DC 20515

Dear Representative Norman:

Thank you for your December 22, 2023, letter addressed to Robert Cook and me regarding Meta Materials Series A preferred shares (MMTLP). I appreciate your interest in this issue.

Respectfully, requests for information sought by FINRA, and for analyses performed by FINRA, are best answered by FINRA.

That said, the SEC's Division of Examinations, through its FINRA and Securities Industry Oversight (FSIO) programs, conducts examinations of FINRA to assure its compliance with applicable laws and regulations as well as to promote fairness, efficiency, and effectiveness in its operations. While I cannot comment on any particular examination, our FSIO program has the role to assess whether FINRA followed its own rules and policies, the adequacy of those rules, and whether they are implemented fairly and without influence from conflicts of interest.

Regarding the share count information you request, I note that Next Bridge included information about the number of MMTLP shares outstanding in its public disclosures in connection with the Next Bridge / MMTLP corporate action. The consolidated audit trail (CAT) data and Blue Sheets you reference in your letter contain non-public regulatory information regarding transactions; this information permits the Commission and the securities self-regulatory organizations to conduct timely and thorough surveillance and enforcement inquiries. The information in the CAT and Blue Sheets is kept confidential and generally is protected by exemptions to the Freedom of Information Act.

As for your questions regarding whether there is evidence of any violations of particular securities laws or SEC rules—in a matter of policy, the Commission conducts enforcement investigations on a confidential basis and generally does not acknowledge the existence or non-existence of any investigation unless or until charges are filed. We do so to protect the integrity of our investigations, safeguard the privacy of witnesses, and avoid damaging the reputation of persons who may not be charged. Accordingly, I cannot comment specifically on certain matters raised in your letter. I assure you that the Commission's staff carefully will consider the

- 19/1/24 – Meta Material states it has received offers to purchase more shares than FINRA's official short aggregate of 2.65million shares <https://www.prnewswire.com/news-releases/next-bridge-hydrocarbons-inc-announces-preliminary-results-of-its-johnson-prospect-drilling-program-302039147.html>

As we enter a new year for Next Bridge, Mr. McCabe and the Company continue to share the deep concerns of our shareholders regarding the circumstances surrounding the US halt of trading prior to the Next Bridge spinout and the unknown volume of uncovered short positions that may persist in our Company. We echo calls for transparency for the benefit of all industry players, from retail investors to regulators, who can only have informed discussions and make prudent decisions with accurate information. Despite the passage of a year since the US halt, critical facts remain elusive. For example, FINRA announced that its investigation showed an approximate aggregate short interest position in MMTLP of 2.65 million shares as of December 12, 2023. However, representatives of short sellers have approached Next Bridge about buying considerably more shares than this figure.

- Extensive review of MMTLP History & includes images of evidence – SEC Commenter <https://www.sec.gov/comments/s7-32-10/s73210-246239-546082.pdf>
- Redditor analysis with evidence on day of halt - [https://www.reddit.com/r/Superstonk/comments/1ahuip4/the\\_golden\\_treasure\\_100\\_proof\\_ap\\_es\\_get\\_paid/?rdt=62891](https://www.reddit.com/r/Superstonk/comments/1ahuip4/the_golden_treasure_100_proof_ap_es_get_paid/?rdt=62891)