

Ally Invest Securities LLC - Held NMS Stocks and Options Order Routing Public Report

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4th Quarter, 2021

October 2021

S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	22.31	3.86	61.97	11.86

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	41.51	40.00	41.78	41.05	46.67	8,536.39	22.0000	1,535.62	22.0001	4,948.64	30.0000	1,729.16	19.2191
G1 Execution Services, LLC	38.95	40.06	39.86	39.23	35.11	8,463.79	22.4397	2,023.28	25.2068	5,045.93	30.0000	1,646.20	25.8427
Virtu Americas, LLC	19.54	19.94	18.36	19.72	18.22	3,888.82	19.2589	575.49	19.6013	2,017.51	30.0000	399.65	20.0856

Material Aspects:

CITADEL SECURITIES LLC:

We receive payment for executed orders routed to Citadel Securities with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.0022 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Extended hours order: up to \$0.001 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: up to \$0.003 per share

These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

G1 Execution Services, LLC:

We receive payment for executed orders routed to G1X Execution Services at the following rates:

- (i) Marketable order, listed equity priced at \$1.00 per share or more: up to \$0.0022 per share
- (ii) Marketable order, listed equity priced under \$1.00 per share: up to \$0.001 per share
- (iii) Non-marketable order, listed equity priced at \$1.00 per share or more: up to \$0.003 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

These payment arrangements are conditioned upon regular attestations to G1X that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Virtu Americas, LLC:

We receive payment for executed orders routed to Virtu Americas with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.00175 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

We do not receive payment for any extended hours orders, regardless of size or marketability. These payment arrangements are conditioned upon regular attestations to Virtu that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

APEX CLEARING CORPORATION:

We route orders of listed equities to our clearing firm, Apex Clearing Corporation, which further routes them to execution venues with which it has relationships. We do not determine or influence where Apex routes our orders. Further, we do not participate in any discussions concerning the payment-for-order-flow arrangements between Apex and the execution venues, nor do we influence those arrangements in any manner. See <https://www.apexclearing.com/sec-rule-606-and-607/> for reports concerning Apex’s order routing practices, which we are adopting by reference.

October 2021

Non-S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
100.00	20.51	5.32	64.12	10.05

Venues

Venue - Non-Directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	41.86	40.17	41.44	41.21	49.74	41,624.95	20.1295	20,167.81	19.6661	38,181.67	27.9645	10,131.39	15.4991
G1 Execution Services, LLC	38.79	39.90	40.79	39.17	32.98	47,099.81	23.2945	24,869.74	24.2119	39,102.99	28.0385	7,804.65	28.5339
Virtu Americas, LLC	19.35	19.93	17.76	19.62	17.28	22,039.75	20.0831	9,564.44	20.0919	16,603.97	29.0032	1,366.46	24.4702

Material Aspects:

CITADEL SECURITIES LLC:

We receive payment for executed orders routed to Citadel Securities with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.0022 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Extended hours order: up to \$0.001 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: up to \$0.003 per share

These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

G1 Execution Services, LLC:

We receive payment for executed orders routed to G1X Execution Services at the following rates:

- (i) Marketable order, listed equity priced at \$1.00 per share or more: up to \$0.0022 per share
- (ii) Marketable order, listed equity priced under \$1.00 per share: up to \$0.001 per share
- (iii) Non-marketable order, listed equity priced at \$1.00 per share or more: up to \$0.003 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

These payment arrangements are conditioned upon regular attestations to G1X that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Virtu Americas, LLC:
We receive payment for executed orders routed to Virtu Americas with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.00175 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

We do not receive payment for any extended hours orders, regardless of size or marketability. These payment arrangements are conditioned upon regular attestations to Virtu that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

APEX CLEARING CORPORATION:
We route orders of listed equities to our clearing firm, Apex Clearing Corporation, which further routes them to execution venues with which it has relationships. We do not determine or influence where Apex routes our orders. Further, we do not participate in any discussions concerning the payment-for-order-flow arrangements between Apex and the execution venues, nor do we influence those arrangements in any manner. See <https://www.apexclearing.com/sec-rule-606-and-607/> for reports concerning Apex’s order routing practices, which we are adopting by reference.

October 2021

Options

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
100.00	5.74	5.85	54.61	33.80

Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	42.46	31.39	33.64	40.02	49.82	30,964.50	49.5900	85,728.50	49.7043	73,849.00	49.3838	67,096.50	45.9480
Wolverine Execution Services, LLC	32.09	33.13	28.52	32.58	31.73	27,173.35	41.7159	65,693.15	48.7399	66,574.40	49.5906	56,219.89	49.8249
Global Execution Brokers LP	25.45	35.48	37.84	27.40	18.45	30,503.40	42.9027	93,567.06	49.6609	86,988.42	50.5371	33,729.37	47.7625

Material Aspects:

CITADEL SECURITIES LLC:
We receive payment for executed multi-listed, non-index option orders routed to Citadel Securities at a rate of up to \$0.50 per contract. Citadel waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Wolverine Execution Services, LLC:

We receive payment for executed multi-listed, non-index option orders routed to Wolverine Execution Services at the following rates:

- (i) Single-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (ii) Single-Leg order, Penny Interval Program: up to \$0.35 per contract
- (iii) Multi-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (iv) Multi-Leg order, Penny Interval Program: up to \$0.43 per contract

Wolverine waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Wolverine that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Global Execution Brokers LP:

We receive payment for executed multi-listed, non-index option orders routed to Global Execution Brokers at the following rates:

- (i) Single-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (ii) Single-Leg order, Penny Interval Program: up to \$0.37 per contract
- (iii) Multi-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (iv) Multi-Leg order, Penny Interval Program: up to \$0.44 per contract

Global Execution Brokers waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Global Execution Brokers that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

November 2021

S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non-Directed Orders	Non-Marketable Limit Orders as % of Non-Directed Orders	Other Orders as % of Non-Directed Orders
100.00	24.84	4.34	58.14	12.68

Venues

Venue - Non-directed Order Flow	Non-Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non-Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/Received for Market Orders(cents per hundred shares)	Net Payment Paid/Received for Marketable Limit Orders(USD)	Net Payment Paid/Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Non-Marketable Limit Orders(USD)	Net Payment Paid/Received for Non-Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	41.31	39.88	41.40	40.66	47.10	9,244.31	22.0000	1,720.92	22.0000	5,431.49	30.0000	2,610.53	19.5167
G1 Execution Services, LLC	39.76	40.15	40.61	40.43	35.65	9,556.53	22.5400	2,245.99	24.1552	5,306.83	30.0000	2,265.66	25.9696
Virtu Americas, LLC	18.93	19.98	17.99	18.92	17.25	4,185.56	18.9537	1,069.48	22.8356	2,031.34	30.0000	653.82	18.8242

Material Aspects:

CITADEL SECURITIES LLC:

We receive payment for executed orders routed to Citadel Securities with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.0022 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Extended hours order: up to \$0.001 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: up to \$0.003 per share

These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

G1 Execution Services, LLC:

We receive payment for executed orders routed to G1X Execution Services at the following rates:

- (i) Marketable order, listed equity priced at \$1.00 per share or more: up to \$0.0022 per share
- (ii) Marketable order, listed equity priced under \$1.00 per share: up to \$0.001 per share
- (iii) Non-marketable order, listed equity priced at \$1.00 per share or more: up to \$0.003 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

These payment arrangements are conditioned upon regular attestations to G1X that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Virtu Americas, LLC:
We receive payment for executed orders routed to Virtu Americas with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.00175 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

We do not receive payment for any extended hours orders, regardless of size or marketability. These payment arrangements are conditioned upon regular attestations to Virtu that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

APEX CLEARING CORPORATION:
We route orders of listed equities to our clearing firm, Apex Clearing Corporation, which further routes them to execution venues with which it has relationships. We do not determine or influence where Apex routes our orders. Further, we do not participate in any discussions concerning the payment-for-order-flow arrangements between Apex and the execution venues, nor do we influence those arrangements in any manner. See <https://www.apexclearing.com/sec-rule-606-and-607/> for reports concerning Apex’s order routing practices, which we are adopting by reference.

November 2021

Non-S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	22.86	5.54	61.44	10.16

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	41.59	40.14	41.17	40.51	51.61	46,521.67	20.1573	23,482.47	19.9301	41,551.58	28.1662	13,496.23	16.0574
G1 Execution Services, LLC	39.60	40.00	40.83	40.51	32.53	53,222.51	23.2416	27,012.20	23.8959	42,618.67	28.0683	9,039.78	27.5259
Virtu Americas, LLC	18.81	19.85	18.00	18.98	15.86	24,371.43	19.9559	9,839.47	20.2636	18,218.32	28.9233	1,293.25	24.2872

Material Aspects:
CITADEL SECURITIES LLC:

We receive payment for executed orders routed to Citadel Securities with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.0022 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Extended hours order: up to \$0.001 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: up to \$0.003 per share

These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

G1 Execution Services, LLC:

We receive payment for executed orders routed to G1X Execution Services at the following rates:

- (i) Marketable order, listed equity priced at \$1.00 per share or more: up to \$0.0022 per share
- (ii) Marketable order, listed equity priced under \$1.00 per share: up to \$0.001 per share
- (iii) Non-marketable order, listed equity priced at \$1.00 per share or more: up to \$0.003 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

These payment arrangements are conditioned upon regular attestations to G1X that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Virtu Americas, LLC:

We receive payment for executed orders routed to Virtu Americas with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.00175 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

We do not receive payment for any extended hours orders, regardless of size or marketability. These payment arrangements are conditioned upon regular attestations to Virtu that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

APEX CLEARING CORPORATION:

We route orders of listed equities to our clearing firm, Apex Clearing Corporation, which further routes them to execution venues with which it has relationships. We do not determine or influence where Apex routes our orders. Further, we do not participate in any discussions concerning the payment-for-order-flow arrangements between Apex and the execution venues, nor do we influence those arrangements in any manner. See <https://www.apexclearing.com/sec-rule-606-and-607/> for reports concerning Apex’s order routing practices, which we are adopting by reference.

November 2021

Options

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	5.80	7.86	51.37	34.97

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	41.85	30.50	32.98	38.80	50.22	29,294.00	49.5141	74,473.50	49.7934	92,083.00	49.5653	68,273.50	46.1607
Wolverine Execution Services, LLC	32.53	33.93	29.05	32.50	33.12	29,468.95	42.5115	58,497.75	49.6564	82,287.50	51.0114	57,579.48	48.9110
Global Execution Brokers LP	25.62	35.57	37.97	28.70	16.66	31,300.60	45.1447	76,986.11	49.8763	102,081.53	50.8470	33,267.58	46.4982

Material Aspects:

CITADEL SECURITIES LLC:
We receive payment for executed multi-listed, non-index option orders routed to Citadel Securities at a rate of up to \$0.50 per contract. Citadel waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Wolverine Execution Services, LLC:
We receive payment for executed multi-listed, non-index option orders routed to Wolverine Execution Services at the following rates:
(i) Single-Leg order, non-Penny Interval Program: up to \$1.00 per contract
(ii) Single-Leg order, Penny Interval Program: up to \$0.35 per contract
(iii) Multi-Leg order, non-Penny Interval Program: up to \$1.00 per contract
(iv) Multi-Leg order, Penny Interval Program: up to \$0.43 per contract
Wolverine waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Wolverine that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Global Execution Brokers LP:
We receive payment for executed multi-listed, non-index option orders routed to Global Execution Brokers at the following rates:
(i) Single-Leg order, non-Penny Interval Program: up to \$1.00 per contract
(ii) Single-Leg order, Penny Interval Program: up to \$0.37 per contract
(iii) Multi-Leg order, non-Penny Interval Program: up to \$1.00 per contract
(iv) Multi-Leg order, Penny Interval Program: up to \$0.44 per contract
Global Execution Brokers waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Global Execution Brokers that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

December 2021

S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	24.01	3.72	61.34	10.93

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	41.95	41.07	41.85	41.37	47.16	7,327.12	22.0000	1,748.19	22.0000	5,943.63	30.0000	1,450.43	19.3554
G1 Execution Services, LLC	38.03	38.04	38.62	38.60	34.60	7,004.42	22.5251	2,670.32	25.9492	6,199.16	30.0000	1,216.31	27.4654
Virtu Americas, LLC	20.02	20.88	19.52	20.03	18.23	3,162.87	18.3298	897.73	21.5353	2,466.52	30.0000	292.03	21.0403

Material Aspects:

CITADEL SECURITIES LLC:

We receive payment for executed orders routed to Citadel Securities with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.0022 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Extended hours order: up to \$0.001 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: up to \$0.003 per share

These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

G1 Execution Services, LLC:

We receive payment for executed orders routed to G1X Execution Services at the following rates:

- (i) Marketable order, listed equity priced at \$1.00 per share or more: up to \$0.0022 per share
- (ii) Marketable order, listed equity priced under \$1.00 per share: up to \$0.001 per share
- (iii) Non-marketable order, listed equity priced at \$1.00 per share or more: up to \$0.003 per share
- (iv) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

These payment arrangements are conditioned upon regular attestations to G1X that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Virtu Americas, LLC:

We receive payment for executed orders routed to Virtu Americas with respect to listed equities priced at \$1.00 per share or more, at the following rates:

- (i) Marketable order: up to \$0.00175 per share
- (ii) Non-marketable order: up to \$0.003 per share
- (iii) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

We do not receive payment for any extended hours orders, regardless of size or marketability. These payment arrangements are conditioned upon regular attestations to Virtu that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

APEX CLEARING CORPORATION:

We route orders of listed equities to our clearing firm, Apex Clearing Corporation, which further routes them to execution venues with which it has relationships. We do not determine or influence where Apex routes our orders. Further, we do not participate in any discussions concerning the payment-for-order-flow arrangements between Apex and the execution venues, nor do we influence those arrangements in any manner. See <https://www.apexclearing.com/sec-rule-606-and-607/> for reports concerning Apex’s order routing practices, which we are adopting by reference.

December 2021

Non-S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	22.05	5.15	64.72	8.08

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	42.19	41.16	42.35	41.40	51.29	36,169.81	19.7259	20,133.54	19.6749	37,557.36	28.2887	10,471.62	17.9710
G1 Execution Services, LLC	37.99	37.89	38.92	38.72	31.90	39,559.95	22.9462	24,389.48	24.5558	35,292.86	27.5420	8,028.03	28.2724
Virtu Americas, LLC	19.81	20.95	18.72	19.89	16.80	19,641.62	20.1103	8,857.12	20.3348	15,107.22	29.2157	1,006.99	23.1461

Material Aspects:

CITADEL SECURITIES LLC:
We receive payment for executed orders routed to Citadel Securities with respect to listed equities priced at \$1.00 per share or more, at the following rates:
(i) Marketable order: up to \$0.0022 per share
(ii) Non-marketable order: up to \$0.003 per share
(iii) Extended hours order: up to \$0.001 per share
(iv) Order greater than 10,000 shares or \$250,000 principal value: up to \$0.003 per share

These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

G1 Execution Services, LLC:
We receive payment for executed orders routed to G1X Execution Services at the following rates:
(i) Marketable order, listed equity priced at \$1.00 per share or more: up to \$0.0022 per share
(ii) Marketable order, listed equity priced under \$1.00 per share: up to \$0.001 per share
(iii) Non-marketable order, listed equity priced at \$1.00 per share or more: up to \$0.003 per share
(iv) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

These payment arrangements are conditioned upon regular attestations to G1X that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Virtu Americas, LLC:
We receive payment for executed orders routed to Virtu Americas with respect to listed equities priced at \$1.00 per share or more, at the following rates:
(i) Marketable order: up to \$0.00175 per share
(ii) Non-marketable order: up to \$0.003 per share
(iii) Order greater than 10,000 shares or \$250,000 principal value: \$0.003 per share

We do not receive payment for any extended hours orders, regardless of size or marketability. These payment arrangements are conditioned upon regular attestations to Virtu that substantially all of the orders we route to them qualify as “retail” orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

APEX CLEARING CORPORATION:
We route orders of listed equities to our clearing firm, Apex Clearing Corporation, which further routes them to execution venues with which it has relationships. We do not determine or influence where Apex routes our orders. Further, we do not participate in any discussions concerning the payment-for-order-flow arrangements between Apex and the execution venues, nor do we influence those arrangements in any manner. See <https://www.apexclearing.com/sec-rule-606-and-607/> for reports concerning Apex’s order routing practices, which we are adopting by reference.

December 2021

Options

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	5.38	7.37	51.94	35.31

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
CITADEL SECURITIES LLC	43.47	31.16	33.46	40.82	51.33	30,841.50	49.6899	62,049.50	49.6889	76,593.00	49.4372	61,093.00	45.3263
Wolverine Execution Services, LLC	31.68	32.85	28.10	32.00	31.80	24,525.15	39.9810	45,086.65	45.6504	65,997.40	47.4082	46,202.09	46.6570

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
Global Execution Brokers LP	24.85	35.99	38.45	27.18	16.88	29,417.70	42.2165	62,281.54	47.2503	88,367.11	48.2395	27,535.54	43.8310

Material Aspects:

CITADEL SECURITIES LLC:

We receive payment for executed multi-listed, non-index option orders routed to Citadel Securities at a rate of up to \$0.50 per contract. Citadel waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Citadel that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Wolverine Execution Services, LLC:

We receive payment for executed multi-listed, non-index option orders routed to Wolverine Execution Services at the following rates:

- (i) Single-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (ii) Single-Leg order, Penny Interval Program: up to \$0.35 per contract
- (iii) Multi-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (iv) Multi-Leg order, Penny Interval Program: up to \$0.43 per contract

Wolverine waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Wolverine that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.

Global Execution Brokers LP:

We receive payment for executed multi-listed, non-index option orders routed to Global Execution Brokers at the following rates:

- (i) Single-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (ii) Single-Leg order, Penny Interval Program: up to \$0.37 per contract
- (iii) Multi-Leg order, non-Penny Interval Program: up to \$1.00 per contract
- (iv) Multi-Leg order, Penny Interval Program: up to \$0.44 per contract

Global Execution Brokers waives fees associated with index options so long as they do not exceed 5% of the total monthly volume. These payment arrangements are conditioned upon regular attestations to Global Execution Brokers that substantially all of the orders we route to them qualify as "retail" orders (i.e., originating from natural persons and not generated by trading algorithms or other computerized methods). Although we do not negotiate for higher payment rates in exchange for lower execution quality, in general there is an inverse (though not necessarily proportional) relationship between payment for order flow rates and price improvement.