

Tullett Prebon Financial Services LLC Rule 606 Disclosure: Q4 2019

Tullett Prebon Financial Services LLC (TPFS) has prepared this report pursuant to a U.S. Securities and Exchange Commission rule requiring all brokerage firms to make available to the public quarterly reports about their order routing practices in U.S. Exchange listed Equities Securities and Options.

This report provides information on the routing of non-directed orders – any order that the customer has not specifically instructed to be routed to a particular venue for execution, with a Market Value < \$200,000. Clients can request specific information regarding the handling of their orders from the TPFS Compliance Department.

TPFS routes orders to market centers including exchanges, alternative trading systems, and broker-dealers that may offer credits for orders that provide liquidity to their books, and assess fees for orders that take liquidity from their books. In some cases, the credits offered by a market center may exceed the charges assessed, such that a market center may make a payment to TPFS in relation to orders directed to such market center.

This report identifies the top venues to which TPFS routed orders, listing percentage for each venue:

NYSE Listed Securities

Venue	% Market	% Limit	% Other	Total %
Goldman Sachs	1.7	0.4	0	0.7
Citadel	9.5	1.3	0	3.5
Cowen	0.0	9.2	0	6.9
Clearpool	0.1	0.3	0	0.1
JP Morgan	0.5	0.4	0	0.5
Virtu	0.0	75.6	0	55.6
Morgan Stanley	0.0	7.0	0	5.1
NYSE	88.1	5.6	0	27.5
Instinet	0.1	0.2	0	0.1
Total	100	100	0	100

% of Total Orders:	26.6%	73.4%	0.0%	100.0%
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NASDAQ Listed Securities

Venue	% Market	% Limit	% Other	Total %
Goldman Sachs	21.0	5.1	0	10.0
Citadel	65.8	33.8	0	43.6
Cowen	0.0	41.1	0	28.5
Clearpool	2.0	2.0	0	2.0
Instinet	9.1	2.8	0	4.8
JP Morgan	1.4	1.0	0	1.1
Virtu	0.6	0.8	0	0.7
Morgan Stanley	0.0	13.1	0	9.1
NASDAQ	0.1	0.3	0	.2
Total	100	100	0	100

% of Total Orders:	30.7%	69.3%	0.0%	100.0%
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AMEX and Regional Exchange Listed Securities

Venue	% Market	% Limit	% Other	Total %
Goldman Sachs	0.0	0.0	0	0.0
Citadel	19.4	9.8	0	18.7
AMEX	78.6	48.3	0	75.2
Cowen	0.0	0.0	0	0.0
Merrill Lynch	0.0	0.0	0	0.0
Morgan Stanley	0.0	0.0	0	0.0
JP Morgan	2.0	41.9	0	6.1
Speedroute	0.0	0.0	0	0.0
Total	100	100	0	100

% of Total Orders:	88.7%	11.3%	0.0%	100.0%
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Exchange Listed Options

Venue	% Market	% Limit	% Other	Total %
AMEX	0.0	23.9	0	23.9
CBOE	0.0	22.5	0	22.5
Instinet	0.0	1.3	0	1.3
ISE	0.0	5.6	0	5.6
PHLX	0.0	46.0	0	46.0
PCSE	0.0	0.7	0	0.7
Total	100	100	0	100

% of Total Orders:	0.0%	100.0%	0.0%	100.0%
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