

TradeZero America Rule 606 Disclosure: 1Q2019

Sec Rule 606 requires broker-dealers that route orders on behalf of customers to make publicly available for each calendar quarter a report on its routing practices. The report provides information on the routing of “non-directed orders” – any order that the customer has not specially instructed to be routed to a venue for execution. For these non-directed orders, TradeZero America has selected the venue on behalf of the client.

The report covers:

- Percentage of total customer order that were non-directed orders.
- Percentage of customer orders that were market orders, limit orders or other orders.
- Venues where non-directed orders were routed.
- Percentage of total non-directed orders routed to venue, and the percentage of non-directed limit orders, non-directed market orders and non-directed other orders routed to the venue.
- Broker-dealers relationship with each venue including a description of any arrangement for payment for order flow and any profit-sharing relationship.

New York Stock Exchange Listed Securities

For quarter ending 3/31/2019	Non-Directed Orders	Market Orders	Limit Orders	Other Orders
Orders Routed to:				
CBOE EDGX Exchange, Inc.	4.20%	0.96%	5.16%	5.32%
Lampost Capital, L.C.	94.45%	97.38%	93.70%	92.73%
APEX, LLC	1.17%	1.59%	0.88%	1.95%
SageTrader, LLC	0.18%	0.07%	0.25%	0.00%
Total Orders	100.00%	23.37%	65.58%	11.05%

Material Aspect of Relationship with Venue

Payment received from Lampost Capital, L.C. average less than \$0.0003 per share

Charge from APEX, LLC average 0.0003 per share with 50% profit-sharing

Payment received from Cboe EDGX Exchange, Inc. averaged 0.00265 per share

Payment received from SageTrader, LLC average less than 0.0025

Nasdaq Stock Market Listed Securities

For quarter ending 3/31/2019	Non-Directed Orders	Market Orders	Limit Orders	Other Orders
Orders Routed to:				
CBOE EDGX Exchange, Inc.	6.35%	1.13%	8.22%	1.91%
Lampost Capital, L.C.	90.09%	94.10%	88.81%	91.68%
APEX, LLC	3.55%	4.76%	2.96%	6.41%
SageTrader, LLC	0.01%	0.01%	0.02%	0.00%
Total	100.00%	20.79%	72.88%	6.33%

Material Aspect of Relationship with Venue

Payments received from Lampost Capital average less than \$0.0003 per share

Charge from APEX average 0.0003 per share with 50% profit-sharing

Payment received from Cboe EDGX Exchange, Inc. averaged 0.00265 per share

Payment received from SageTrader, LLC average less than 0.0025

NYSE America or any other National Securities Exchange Listed Securities

For quarter ending 3/31/2019	Non-Directed Orders	Market Orders	Limit Orders	Other Orders
Orders Routed to:				
CBOE EDGX Exchange, Inc.	18.86%	0.00%	25.49%	3.74%
Lampost Capital, L.C.	72.03%	87.92%	67.59%	72.03%
APEX, LLC	9.11%	12.08%	6.92%	24.23%
Total	100.00%	20.40%	73.04%	6.56%

Material Aspect of Relationship with Venue

Payment received from Lampost Capital, L.C. average less than \$0.0003 per share

Charge from APEX, LLC average \$0.0003 per share with 50% profit-sharing

Payment received from Cboe EDGX Exchange, Inc. averaged \$0.00265 per share