20 3

xxx

\* \* \*

\* \* \* \*

k k k k

\* \* \* \*

k ok ok ok

\* \* \* >

\* \* \*

\* \* \* \* Y

k \* \* \*

\* \* \* \* >

k x k x

\*\* \*\* \* >

k \* \* \*

Ve ve v

to the y

· the ster store of

\* \* \* \*

r ste ste ste s

\* \* \* \*

sk sk sk sk

the ster ster st

sk sk sk sk

· ste ste ste s

\* \* \* \*

r the the the t

ic ic ic ic

the ster ster st

sic sic sic sic

The the the

\* \* \* \*

the ster ster

# The OTC Conspiracy

GME, idiosyncrasies, and the infinite Banana Trees

Shining Some Light into the Dark Pool data

# Probably the last DD you'll ever need to read... The OTC Conspiracy - Shining Some Light into the Dark Pool data - Apr. 25, 2021

#### Due Diligence

I know that collectively, we are anti-conspiracy right now, but as a simple ape, I just liked the way it rhymed.

What I'm presenting is 100% based on the publicly available published FINRA OTC data. The way FINRA presents their data makes it really difficult to spot anomalies and trends, so I decided to compile it into an Excel spreadsheet. The trends are clear. The data is revealing. And the Hedgies have some serious wedgies.

The data is pretty dense. I will try to give an overview of the "what" and the "when" and then cover the "who". My brain is too smooth to understand the "how" and the "why", so I'm hoping that this DD and the supporting data can help other apes unravel the full story.

If you haven't read my previous posts, I'll link them here so you can catch up.

FINRA ADF is not in operation (4/20)

Missing GME Bananas (4/21)

An Update on the Missing Bananas (4/23)

It's pretty easy to track my train of thought. And the fact that I was able to put this together in less than a week really makes me question what's going on with regulators behind the scenes...

**To summarize** - like many of my fellow apes, I was trying to understand this **FINRA ADF** nonsense and why a majority of daily volume was being routed there. All that buying pressure had almost no effect on increasing the price.

Then, I noticed that the calculated volume didn't add up to the daily trading volume on Bloomberg Terminals. There were missing bananas, and I wanted to find them.

After a few adjustments to the search criteria, I was able to see that the bananas weren't necessarily missing, but were not going through any of the exchanges. **Over 90%** of trades from 4/13 - 4/20 were being routed through **FINRA ADF** or some unknown dark pools (**OTC**). That really pissed me off...

So this weekend, I did some digging on the OTC website.

<u>u/broccaaa</u>'s DD on <u>FTDs and Dark Pools</u> really helped me to understand that something weird was going on and has been going on for several months. I still don't understand the majority of what he covers, but the Dark Pool part seemed to click.

<u>u/plants69</u> also had a DD <u>The Most Manipulated Stock - GME</u> which I saw just before starting to write this one. She does a great job digging into the "How" (with married puts and FTDs). She also does a deep dive into the **ATS data**, which I will only present in passing. Check out her DD!

Here goes nothing...

We'll start really general and then go into more detail.

#### Table 1: Monthly GME OTC activity

| GME Monthly OTC Trades | Total Shares | Total Trades | Avg Shares/Trade |
|------------------------|--------------|--------------|------------------|
| September              | 110,343,709  | 272,575      | 404.82           |
| October                | 175,908,562  | 477,193      | 368.63           |
| November               | 69,438,259   | 231,210      | 300.33           |
| December               | 110,569,834  | 420,166      | 263.16           |
| January                | 525,247,645  | 5,777,645    | 90.91            |
| February               | 302,110,234  | 7,740,859    | 39.03            |

Monthly GME OTC Activity from September 2020 - February 2021

Not too difficult to spot the trend in this one. The number of shares that were traded OTC increased **4.75x** from December 2020 to January 2021.

The number of OTC trades increased **13.75x** from December 2020 to January 2021.

The number of OTC trades increased **18.42x** from December 2020 to February 2021.

The average size of the trade also has progressively decreased every month, from **over 400 shares/trade** in September to **39 shares/trade** in February.

And just look at the **number** of shares that were traded OTC. Over **525 million** shares traded in January, and over **300 million in February**. To put that in perspective, let's remind ourselves that the GME float is somewhere around **26.7 million** (and quite possibly less).

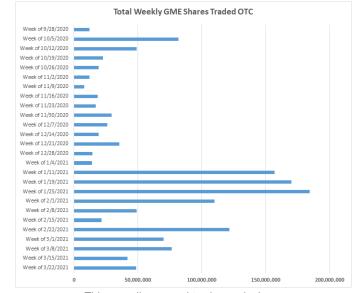
Here's the Weekly GME OTC data from September 28, 2020 through March 26, 2021.

#### Table 2: Weekly GME OTC activity

|                   | Shares      | Trades    | Shares/Trade | Week of 1/19/2021  | 170,039,730 | 849,773 | 200.10 |
|-------------------|-------------|-----------|--------------|--------------------|-------------|---------|--------|
| Week of 3/22/2021 | 48,568,861  | 1,436,410 | 33.81        | Week of 1/11/2021  | 156,958,902 | 588,136 | 266.88 |
| Week of 3/15/2021 | 41,980,529  | 1,403,548 | 29.91        | Week of 1/4/2021   | 13,926,925  | 63,783  | 218.35 |
| Week of 3/8/2021  | 76,529,930  | 2,960,633 | 25.85        | Week of 12/28/2020 | 14,402,253  | 64,118  | 224.62 |
| Week of 3/1/2021  | 70,118,713  | 1,477,452 | 47.46        | Week of 12/21/2020 | 35,405,726  | 122,854 | 288.19 |
| Week of 2/22/2021 | 121,667,480 | 3,157,057 | 38.54        | Week of 12/14/2020 | 19,437,594  | 60,013  | 323.89 |
| Week of 2/15/2021 | 21,554,348  | 341,014   | 63.21        | Week of 12/7/2020  | 26,137,279  | 107,667 | 242.76 |
|                   |             |           |              | Week of 11/30/2020 | 29,383,508  | 126,962 | 231.44 |
| Week of 2/8/2021  | 49,113,110  | 825,424   | 59.50        | Week of 11/23/2020 | 16,841,977  | 55,877  | 301.41 |
| Week of 2/1/2021  | 109,775,296 | 3,417,364 | 32.12        | Week of 11/16/2020 | 18,443,760  | 46,841  | 393.75 |
| Week of 1/25/2021 | 184,322,088 | 4,275,953 | 43.11        | Week of 11/9/2020  | 7,868,516   | 31,712  | 248.12 |
| Week of 1/19/2021 | 170,039,730 | 849,773   | 200.10       | Week of 11/2/2020  | 12,087,480  | 35,332  | 342.11 |
| Week of 1/11/2021 | 156,958,902 | 588,136   | 266.88       | Week of 10/26/2020 | 19,273,541  | 55,756  | 345.68 |
|                   |             |           |              | Week of 10/19/2020 | 22,694,461  | 67,949  | 333.99 |
|                   |             |           |              | Week of 10/12/2020 | 48,925,291  | 132,438 | 369.42 |
|                   |             |           |              | Week of 10/5/2020  | 81,492,034  | 209,031 | 389.86 |
|                   |             |           |              | Week of 9/28/2020  | 11,962,882  | 34,552  | 346.23 |

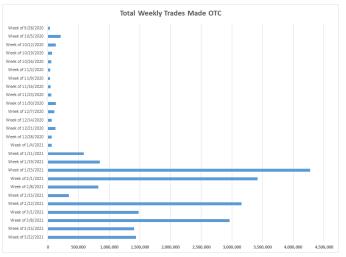
Sure seems like the GME OTC data has rapidly evolved since January

#### Figure 1: Total Weekly GME Shares Traded OTC



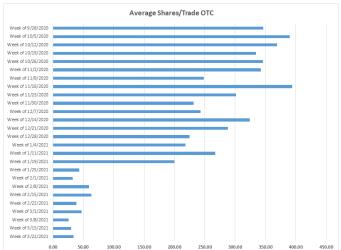
Things really seemed to change in January

#### Figure 2: Total Weekly Trades Made OTC



Look how those weekly OTC trades increased

#### Figure 3: Average Shares/Trade OTC



The number of shares/trade markedly decreased during the week of 1/25 and has remained less than 50 shares/trade since 2/22

So back in late September, October, November, December, and even mid-January, the average shares/trade in the OTC market was between **218** and **393** shares/trade.

The number of **OTC trades** for the 15 weeks leading up to January 11th was between **31,712** and **132,438**, with one outlier being the week of 10/5/20. The week of 10/5 had **81.49 million** in OTC volume and **209,031** trades, but still an average of **389.86** shares/trade.

During the week of January 11th, almost **157 million** shares were traded OTC and the number of OTC trades increased almost **3x** that previous outlier, to **588,136** trades.

During the week of January 19th, over **170 million** shares were traded OTC. A new record **849,733** trades were made OTC (**4x** the 10/5 outlier) and the average number of shares/trade dropped to a new low of **200.1** shares/trade.

During the week of January 25th, over **184 million** shares were traded OTC in **4.276 million** trades (**20.45x** the 10/5 outlier) for an average of **43.11** shares/trade.

So things got weird in January. Let's take a closer look at that data as a whole.

#### Table 3: January GME OTC data by sorted by Trades

| January OTC by Trades          |             |           |              |
|--------------------------------|-------------|-----------|--------------|
|                                | Shares      | Trades    | Shares/Trade |
| CITADEL SECURITIES LLC         | 252,215,846 | 2,557,687 | 98.61        |
| VIRTU AMERICAS LLC             | 136,746,921 | 1,774,037 | 77.08        |
| G1 EXECUTION SERVICES, LLC     | 76,372,485  | 536,911   | 142.24       |
| TWO SIGMA SECURITIES, LLC      | 10,614,663  | 385,471   | 27.54        |
| JANE STREET CAPITAL, LLC       | 13,545,773  | 206,678   | 65.54        |
| UBS SECURITIES LLC             | 10,143,759  | 108,283   | 93.68        |
| COMHAR CAPITAL MARKETS, LLC    | 7,540,994   | 64,824    | 116.33       |
| WOLVERINE SECURITIES, LLC      | 3,966,090   | 40,405    | 98.16        |
| ATIONAL FINANCIAL SERVICES LLC | 40,913      | 39,912    | 1.03         |
| STOCKPILE INVESTMENTS, INC.    | 34,512      | 19,044    | 1.81         |
| De Minimis Firms               | 5,022,071   | 15,044    | 333.83       |
| HRT EXECUTION SERVICES LLC     | 1,075,312   | 8,791     | 122.32       |
| COWEN AND COMPANY              | 5,995,907   | 7,923     | 756.77       |
| CUTTONE & CO., LLC             | 624,884     | 7,538     | 82.90        |
| LEK SECURITIES CORPORATION     | 1,307,515   | 5,097     | 256.53       |
| Total                          | 525,247,645 | 5,777,645 | 90.91        |

January 2021 GME OTC data sorted by number of Trades

So this shows us the major players in January. Citadel, Virtu, G1 Execution, Jane Street, and Two Sigma traded the most number of **shares** OTC. You can sort by Shares or Trades, and I'm going to be consistent and sort by trades, because I think it's telling to see who was most active.

**National Financial Services** (Fidelity???) and **Stockpile Investments** were outliers in terms of shares/trade. Looks like some high frequency trading (HFT) if you ask me. **NFS** first began trading GME OTC during the week of **1/11**/2021 (never previously active from September - December). Stockpile first begin trading OTC during the week of 1/25. I'll leave it there for now.

So **Citadel** traded over **252 million** GME shares in the OTC market in January. They were busy. Based off their 13F filing, how many GME shares did they actually own again? **217,132** shares. In January, they traded **over 1161** GME shares for every **1** share that they own.

What about **Virtu Americas**? They were really active on the OTC market in January too, trading over **136 million** GME shares. As of 12/11/20, they owned exactly 0 GME shares. Luckily for them, they purchased **36,450** as of the 12/31 13F filing. In January, they traded **over 3751** GME shares for every **1** share that they own.

From what I understand, **G1 Execution Services** is basically **Susquehanna**. They decreased their number of GME shares from 4.444 million to **2.487 million** per their 12/31 13F. In January, they traded **30.7** GME shares for every **1** GME share that they own. According to the recent GME proxy, they now own **4.409 million** GME shares, but likely acquired these sometime after January.

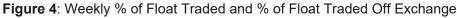
**Two Sigma** went from **0** GME shares on 11/16/20 to **81,448** GME shares on 12/31. They've been making smaller and smaller shares/trade for a little while now, with an average of **27.54** shares/trade in January.

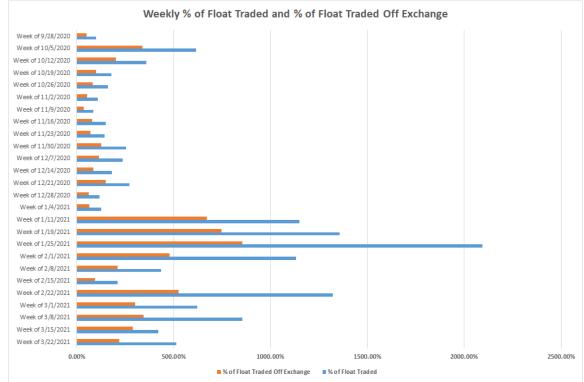
Let's zoom out one more time before looking at each of these players individually.

Table 4: GME Weekly Volume and % Weekly Volume traded Off-Exchange

|                    | Total Weekly Volume | Total Volume OTC | Total Volume ATS | % of Total traded Off<br>Exchange (OTC + ATS) | % of Float Traded | % of Float Traded Off<br>Exchange |
|--------------------|---------------------|------------------|------------------|---|-------------------|-----------------------------------|
| Week of 3/22/2021  | 137,061,550         | 48,568,861       | 10,272,415       | 42.93%  | 513.34%           | 220.38%                           |
| Week of 3/15/2021  | 112,607,860         | 70,118,713       | 7,111,156        | 68.58%  | 421.75%           | 289.25%                           |
| Week of 3/8/2021   | 228,393,910         | 76,529,930       | 15,948,009       | 40.49%  | 855.41%           | 346.36%                           |
| Week of 3/1/2021   | 166,191,450         | 70,118,713       | 10,322,290       | 48.40%  | 622.44%           | 301.28%                           |
| Week of 2/22/2021  | 352,655,925         | 121,667,480      | 18,960,413       | 39.88%  | 1320.81%          | 526.70%                           |
| Week of 2/15/2021  | 56,254,625          | 21,554,348       | 3,905,721        | 45.26%  | 210.69%           | 95.36%                            |
| Week of 2/8/2021   | 116,615,390         | 49,113,110       | 6,997,461        | 42.28%  | 436.76%           | 210.15%                           |
| Week of 2/1/2021   | 302,036,020         | 109,775,296      | 17,913,654       | 42.28%  | 1131.22%          | 478.24%                           |
| Week of 1/25/2021  | 559,240,540         | 184,322,088      | 44,126,023       | 40.85%  | 2094.53%          | 855.61%                           |
| Week of 1/19/2021  | 362,431,360         | 170,039,730      | 29,392,454       | 55.03%  | 1357.42%          | 746.94%                           |
| Week of 1/11/2021  | 307,073,745         | 156,958,902      | 22,330,904       | 58.39%  | 1150.09%          | 671.50%                           |
| Week of 1/4/2021   | 33,651,411          | 13,926,925       | 3,458,092        | 51.66%  | 126.04%           | 65.11%                            |
| Week of 12/28/2020 | 31,064,342          | 14,402,253       | 1,876,336        | 52.40%  | 116.35%           | 60.97%                            |
| Week of 12/21/2020 | 72,656,282          | 35,405,726       | 4,900,689        | 55.48%  | 272.12%           | 150.96%                           |
| Week of 12/14/2020 | 48,878,751          | 19,437,594       | 3,104,483        | 46.12%  | 183.07%           | 84.43%                            |
| Week of 12/7/2020  | 62,920,148          | 26,137,279       | 4,150,662        | 48.14%  | 235.66%           | 113.44%                           |
| Week of 11/30/2020 | 67,800,547          | 29,383,508       | 4,711,742        | 50.29%  | 253.93%           | 127.70%                           |
| Week of 11/23/2020 | 38,158,975          | 16,841,977       | 2,360,074        | 50.32%  | 142.92%           | 71.92%                            |
| Week of 11/16/2020 | 39,812,179          | 18,443,760       | 2,542,870        | 52.71%  | 149.11%           | 78.60%                            |
| Week of 11/9/2020  | 22,855,460          | 7,868,516        | 1,821,048        | 42.39%  | 85.60%            | 36.29%                            |
| Week of 11/2/2020  | 28,712,842          | 12,087,480       | 1,901,811        | 48.72%  | 107.54%           | 52.39%                            |
| Week of 10/26/2020 | 42,724,069          | 19,273,541       | 2,489,415        | 50.94%  | 160.02%           | 81.51%                            |
| Week of 10/19/2020 | 47,854,503          | 22,694,461       | 3,625,621        | 55.00%  | 179.23%           | 98.58%                            |
| Week of 10/12/2020 | 96,158,570          | 48,925,291       | 4,814,628        | 55.89%  | 360.14%           | 201.27%                           |
| Week of 10/5/2020  | 164,255,374         | 81,492,034       | 9,438,647        | 55.36%  | 615.19%           | 340.56%                           |
| Week of 9/28/2020  | 26,982,234          | 11,962,882       | 1,528,266        | 50.00%  | 101.06%           | 50.53%                            |

Take a look at % of GME Float Traded and % of Float Traded Off Exchange





These are percentages...

Let me preface this by saying that I was extremely conservative and used the **26.7 million** number as the GME float for all calculations. If the GME float is less 26.7 million, these percentages will actually increase accordingly. I took the weekly volume and compared it to the OTC volume and ATS volume. I added the OTC and ATS to determine how much of the weekly volume was traded off exchange. These numbers were fairly consistent, with between **39.88 and 58.39%** of weekly volume trading off exchange in the **OTC** or **ATS** pools. However, the most recent data available shows a huge jump during the week of 3/15, with **68.58%** of volume trading off exchange. These seem to be in line with my calculations from my previous post (An Update on the Missing GME Bananas), which showed **over 70%** of daily GME volume was being traded via **FINRA ADF** (dark pool), or possibly **OTC** from 4/13 - 4/20. FINRA won't publish that data for another **4 weeks**, but I don't think we even need it anymore. What's missing from the daily totals is traded OTC or ATS. And that percentage is only increasing with less and less weekly volume.

For the next column, I took the weekly volume and divided by **26.7 million** to get the percent of GME float that was traded each week. Over **1000%** of the GME float was traded during the weeks of 1/11, 1/19, 1/25, 2/1, and 2/22. During the week of 1/25, the percent of GME float traded was over **2000%**!

But how much of the GME float was traded off exchange? Well, you see some pretty high numbers during October with over 340% of the float traded off exchange during the week of 10/5 and over 200% of the GME float traded off exchange during the week of 10/12. There are a few weeks when the percentage of float traded off exchange was over 100% (11/30, 12/7, and 12/21). Then comes January...

During the week of 1/11, over 671% of the GME float was traded off exchange.

During the week of 1/19, over **746%** of the GME float was traded off exchange.

During the week of 1/25, over 855% of the GME float was traded off exchange.

During the week of 2/1, over **478%** of the GME float was traded off exchange.

And during the week of 2/22, over **526%** of the GME float was traded off exchange.

That's one way to suppress buying pressure...

#### Let's move on to February

#### Table 5: February OTC by Number of Trades

| February OTC by Trades          |             |           |                  |
|---------------------------------|-------------|-----------|------------------|
|                                 | Shares      | Trades    | Avg Shares/Trade |
| CITADEL SECURITIES LLC          | 115,716,597 | 2,653,066 | 43.62            |
| VIRTU AMERICAS LLC              | 116,013,310 | 1,991,314 | 58.26            |
| G1 EXECUTION SERVICES, LLC      | 27,507,754  | 954,960   | 28.81            |
| ROBINHOOD SECURITIES, LLC       | 774,632     | 772,023   | 1.00             |
| TWO SIGMA SECURITIES, LLC       | 12,508,493  | 704,645   | 17.75            |
| JANE STREET CAPITAL, LLC        | 10,662,807  | 252,904   | 42.16            |
| UBS SECURITIES LLC              | 10,469,805  | 141,918   | 73.77            |
| WOLVERINE SECURITIES, LLC       | 353,633     | 91,966    | 3.85             |
| NATIONAL FINANCIAL SERVICES LLC | 74,322      | 73,119    | 1.02             |
| COMHAR CAPITAL MARKETS, LLC     | 3,515,877   | 56,215    | 62.54            |
| STOCKPILE INVESTMENTS, INC.     | 40,218      | 21,616    | 1.86             |
| CUTTONE & CO., LLC              | 400,198     | 9,486     | 42.19            |
| De Minimis Firms                | 2,219,180   | 7,901     | 280.87           |
| INTERACTIVE BROKERS LLC         | 4,878       | 4,878     | 1.00             |
| COWEN AND COMPANY               | 1,848,530   | 4,848     | 381.30           |
| Total                           | 302,110,234 | 7,740,859 | 39.03            |

Look who decided to join the fray ...

As we saw in **Table 1**, the average number of shares/trade decreased from 90.1 to 39.0. And look who decided to join in on the OTC frenzy - Vlad the Impaler and **Robinhood**.

Fortunately for us, this is the first time they took part in the OTC.

They made **772,023 trades** with only **774,632 shares** for an average of **1.00 shares/trade**. That's some high frequency trading if I've ever seen it. Was it coordinated in a way to crush the price after the January peak?

I still don't know what to think about National Financial Services (Fidelity?), but the data doesn't lie.

Rather than commenting on each player here, I'm going to group them together to see what really happened on a weekly basis.

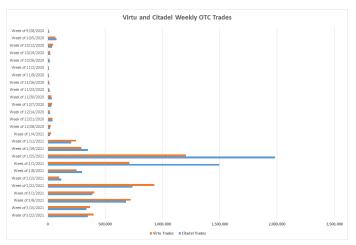
# The Kingpins - Citadel and Virtu

#### Table 6: Citadel and Virtu Weekly OTC trades

|                    | Citadel Shares | Citadel Trades | Citadel Shares/Trade | Virtu Shares | Virtu Trades | Virtu Shares/Trade |
|--------------------|----------------|----------------|----------------------|--------------|--------------|--------------------|
| Week of 3/22/2021  | 14,661,892     | 350,723        | 41.80                | 19,014,998   | 399,802      | 47.56              |
| Week of 3/15/2021  | 13,090,779     | 337,874        | 38.74                | 15,992,280   | 368,018      | 43.46              |
| Week of 3/8/2021   | 23,908,440     | 681,265        | 35.09                | 29,256,853   | 723,074      | 40.46              |
| Week of 3/1/2021   | 22,298,959     | 388,993        | 57.32                | 28,532,932   | 405,242      | 70.41              |
| Week of 2/22/2021  | 39,259,675     | 739,295        | 53.10                | 52,451,996   | 927,612      | 56.55              |
| Week of 2/15/2021  | 7,887,651      | 118,457        | 66.59                | 8,552,670    | 100,028      | 85.50              |
| Week of 2/8/2021   | 18,848,780     | 298,575        | 63.13                | 19,222,124   | 251,804      | 76.34              |
| Week of 2/1/2021   | 49,720,491     | 1,496,739      | 33.22                | 35,786,520   | 711,870      | 50.27              |
| Week of 1/25/2021  | 92,991,756     | 1,983,757      | 46.88                | 43,388,647   | 1,205,460    | 35.99              |
| Week of 1/19/2021  | 80,131,562     | 351,241        | 228.14               | 44,777,619   | 293,688      | 152.47             |
| Week of 1/11/2021  | 73,156,206     | 203,633        | 359.26               | 44,448,707   | 247,026      | 179.94             |
| Week of 1/4/2021   | 5,936,322      | 19,056         | 311.52               | 4,131,948    | 27,863       | 148.30             |
| Week of 12/28/2020 | 5,751,265      | 19,245         | 298.84               | 3,836,975    | 26,060       | 147.24             |
| Week of 12/21/2020 | 15,865,091     | 42,354         | 374.58               | 9,585,035    | 42,012       | 228.15             |
| Week of 12/14/2020 | 8,738,023      | 21,179         | 412.58               | 4,156,969    | 17,617       | 235.96             |
| Week of 12/7/2020  | 10,897,821     | 30,838         | 353.39               | 8,510,318    | 39,174       | 217.24             |
| Week of 11/30/2020 | 12,214,717     | 36,410         | 335.48               | 8,090,526    | 33,199       | 243.70             |
| Week of 11/23/2020 | 7,648,397      | 18,709         | 408.81               | 4,183,548    | 13,899       | 301.00             |
| Week of 11/16/2020 | 8,017,917      | 16,665         | 481.12               | 4,727,447    | 11,371       | 415.75             |
| Week of 11/9/2020  | 3,246,186      | 10,497         | 309.25               | 1,834,818    | 7,841        | 234.00             |
| Week of 11/2/2020  | 5,335,110      | 11,819         | 451.40               | 3,575,977    | 9,179        | 389.58             |
| Week of 10/26/2020 | 8,064,532      | 19,052         | 423.29               | 5,796,180    | 14,968       | 387.24             |
| Week of 10/19/2020 | 9,508,051      | 23,582         | 403.19               | 7,376,522    | 19,824       | 372.10             |
| Week of 10/12/2020 | 16,781,496     | 39,404         | 425.88               | 17,854,614   | 45,463       | 392.73             |
| Week of 10/5/2020  | 35,590,247     | 75,652         | 470.45               | 27,079,731   | 67,595       | 400.62             |
| Week of 9/28/2020  | 5,175,818      | 13,153         | 393.51               | 3,704,577    | 8,778        | 422.03             |

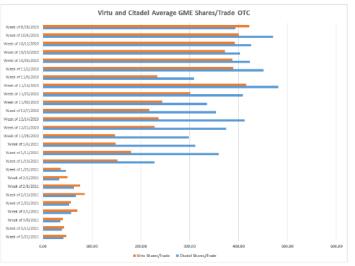
Look at the number of OTC trades and the change in shares/trade since January

Figure 5: Virtu and Citadel Weekly OTC Trades



Things really picked up in the OTC in January for these two

Figure 6: Virtu and Citadel Average GME Shares/Trade OTC



The number of shares/trade really dropped off since January 25th...

So these are the two biggest players when it comes to the GME OTC marketplace. Both have been trading a massive number of GME shares and making a massive number of trades since late September.

However, beginning 1/25, both began making much smaller trades. The number of shares per trade decreased from around 300-400 shares/trade to less than 90 shares/trade. The number of trades increased from tens of thousands to hundreds of thousands (and even millions).

For Shitadel, 7 out of the previous 9 weeks (77.7%) resulted in shares/trade under 60.

They made over **1.98 million OTC trades** during the week of **1/25** and over **1.496 million OTC trades** during the week of **2/1**.

Prior to January, their previous high for number of trades was 75,652 (10/5).

And a quick reminder, Shitadel, as of 12/31, owned only 217,132 GME shares.

For Virtu, 7 out of the previous 9 weeks (77.7%) resulted in shares/trade under 75.

They made over **1.2 million OTC trades** during the week of **1/25**.

Prior to January, their previous high was **67,595 trades** (10/5) and a majority of the weeks totaled between 10,000 and 40,000 OTC trades.

Again, a quick reminder that Virtu owned **0** GME shares on 12/11/20, and **36,450** as of the 12/31.

There are certainly a lot of similarities between these 2 kingpins and that's why I grouped them together. As for coordination???

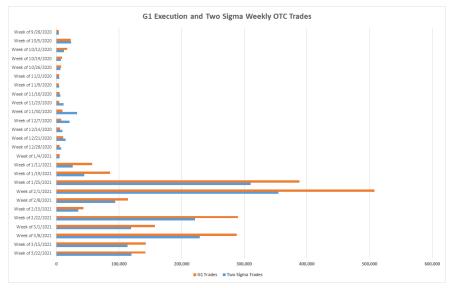
### The Middle Men? - G1 Execution and Two Sigma

#### Table 7: Two Sigma and G1 Execution Weekly OTC trades

|                    | Two Sigma Shares | Two Sigma Trades | Two Sigma Shares/Trade | G1 Shares  | G1 Trades | G1 Shares/Trade |
|--------------------|------------------|------------------|------------------------|------------|-----------|-----------------|
| Week of 3/22/2021  | 2,645,822        | 119,800          | 22.09                  | 4,766,416  | 142,289   | 33.50           |
| Week of 3/15/2021  | 2,026,245        | 113,810          | 17.80                  | 4,218,976  | 142,948   | 29.51           |
| Week of 3/8/2021   | 4,149,293        | 229,172          | 18.11                  | 7,606,670  | 288,151   | 26.40           |
| Week of 3/1/2021   | 3,463,047        | 119,209          | 29.05                  | 6,631,980  | 157,625   | 42.07           |
| Week of 2/22/2021  | 5,393,608        | 221,579          | 24.34                  | 11,598,219 | 289,751   | 40.03           |
| Week of 2/15/2021  | 1,032,460        | 34,826           | 29.65                  | 1,680,471  | 43,035    | 39.05           |
| Week of 2/8/2021   | 2,372,217        | 94,006           | 25.23                  | 2,960,287  | 114,354   | 25.89           |
| Week of 2/1/2021   | 3,710,208        | 354,234          | 10.47                  | 10,268,777 | 507,820   | 20.22           |
| Week of 1/25/2021  | 4,379,714        | 309,797          | 14.14                  | 22,258,085 | 388,250   | 57.33           |
| Week of 1/19/2021  | 2,820,550        | 44,620           | 63.21                  | 28,034,417 | 85,673    | 327.23          |
| Week of 1/11/2021  | 3,024,572        | 25,886           | 116.84                 | 24,381,517 | 57,490    | 424.10          |
| Week of 1/4/2021   | 389,827          | 5,168            | 75.43                  | 1,698,466  | 5,498     | 308.92          |
| Week of 12/28/2020 | 396,272          | 7,861            | 50.41                  | 1,754,213  | 5,569     | 315.00          |
| Week of 12/21/2020 | 1,010,481        | 15,062           | 67.09                  | 4,330,695  | 11,235    | 385.46          |
| Week of 12/14/2020 | 663,272          | 9,814            | 67.58                  | 2,417,185  | 5,881     | 411.02          |
| Week of 12/7/2020  | 948,935          | 21,158           | 44.85                  | 2,707,956  | 7,804     | 347.00          |
| Week of 11/30/2020 | 1,273,191        | 33,438           | 38.08                  | 3,507,642  | 9,434     | 371.81          |
| Week of 11/23/2020 | 555,794          | 11,546           | 48.14                  | 2,478,970  | 4,859     | 510.18          |
| Week of 11/16/2020 | 632,190          | 6,686            | 94.55                  | 2,462,092  | 5,250     | 468.97          |
| Week of 11/9/2020  | 362,535          | 4,604            | 78.74                  | 1,010,001  | 4,071     | 248.10          |
| Week of 11/2/2020  | 534,754          | 4,592            | 116.45                 | 1,252,948  | 4,343     | 288.50          |
| Week of 10/26/2020 | 747,373          | 6,820            | 109.59                 | 2,384,619  | 7,539     | 316.30          |
| Week of 10/19/2020 | 743,691          | 7,016            | 106.00                 | 2,566,965  | 8,935     | 287.29          |
| Week of 10/12/2020 | 1,973,757        | 12,381           | 159.42                 | 6,854,778  | 17,592    | 389.65          |
| Week of 10/5/2020  | 2,989,613        | 23,475           | 127.35                 | 9,508,400  | 22,732    | 418.28          |
| Week of 9/28/2020  | 456,591          | 4.109            | 111.12                 | 1.346.161  | 3,920     | 343.41          |

Again, look at the change in trades and shares/trade since January

Figure 7: G1 Execution and Two Sigma Weekly OTC Trades



Things really picked up in January for them too...

I won't belabor the point, but look at the change in shares/trade (**Table 7**) beginning **1/25**. Look at the increase in number of shares and number of trades.

For Two Sigma, the number of shares/trade after 1/25 was never higher than 30.

As a reminder, Two Sigma went from 0 GME shares on 11/16/20 to 81,448 GME shares on 12/31.

For **G1**, the number of shares/trade after 1/25 was never higher than 60. If **G1 Execution Services = Susquehanna**, then they have over **4.409 million** shares.

# High Frequency Parasites? Robinhood and National Financial Services (NFS)

#### Table 8: Robinhood and NFS Weekly OTC Trading

|                   | Robinhood Shares | Robinhood Trades | RH Shares/Trade | NFS Shares | NFS Trades | NRS Shares/Trade |
|-------------------|------------------|------------------|-----------------|------------|------------|------------------|
| Week of 3/22/2021 | 267,095          | 266,981          | 1.00            | 18,651     | 18,644     | 1.00             |
| Week of 3/15/2021 | 297,276          | 297,194          | 1.00            | 17,539     | 17,536     | 1.00             |
| Week of 3/8/2021  | 765,811          | 763,327          | 1.00            | 33,957     | 33,934     | 1.00             |
| Week of 3/1/2021  | 257,412          | 257,315          | 1.00            | 12,983     | 12,966     | 1.00             |
| Week of 2/22/2021 | 757,954          | 755,424          | 1.00            | 25,195     | 24,057     | 1.05             |
| Week of 2/15/2021 | 14,983           | 14,907           | 1.01            | 2,984      | 2,983      | 1.00             |
| Week of 2/8/2021  | 1,678            | 1,675            | 1.00            | 7,837      | 7,826      | 1.00             |
| Week of 2/1/2021  |                  |                  |                 | 38,306     | 38,253     | 1.00             |
| Week of 1/25/2021 |                  |                  |                 | 33,406     | 32,660     | 1.02             |
| Week of 1/19/2021 |                  |                  |                 | 4,784      | 4,665      | 1.03             |
| Week of 1/11/2021 |                  |                  |                 | 2,343      | 2,214      | 1.06             |

I don't know how else to interpret this other than massive High Frequency Trading by Robinhood

**Robinhood** (unfortunately) entered the fray during the week of **2/8**. They have progressively increased their trading activity.

During the week of **2/22**, they made **755,424 trades** with **757,954** of our **GME shares**. They might have been desperately trying to fend off our rapid ascent on **2/24**. The activity slowed during the week of **3/1**, before ramping up during the week of **3/8**. Is that significant? Well if we look back to 3/10, we had that massive drop from 348 to 172 in a matter of minutes. So you tell me...

This one sort of confuses me as a Fidelity customer. **National Financial Services** first entered the OTC marketplace during the week of 1/11. There was a jump in the number of trades during the weeks of 1/25 and 2/1, but the average number of shares/trade remained between 1.02 and 1.00. There was also an increase in OTC trades during the week of 2/22 and 3/8.

Table 9: Week of 3/8/2021 by Number of OTC Trades

| Week of 3/8/2021 by Trades      | Shares     | Trades    | Shares/Trade |
|---------------------------------|------------|-----------|--------------|
| ROBINHOOD SECURITIES, LLC       | 765,811    | 763,327   | 1.00         |
| VIRTU AMERICAS LLC              | 29,256,853 | 723,074   | 40.46        |
| CITADEL SECURITIES LLC          | 23,908,440 | 681,265   | 35.09        |
| G1 EXECUTION SERVICES, LLC      | 7,606,670  | 288,151   | 26.40        |
| TWO SIGMA SECURITIES, LLC       | 4,149,293  | 229,172   | 18.11        |
| JANE STREET CAPITAL, LLC        | 4,635,098  | 142,790   | 32.46        |
| UBS SECURITIES LLC              | 3,713,408  | 54,452    | 68.20        |
| NATIONAL FINANCIAL SERVICES LLC | 33,957     | 33,934    | 1.00         |
| COMHAR CAPITAL MARKETS, LLC     | 1,467,847  | 27,690    | 53.01        |
| WOLVERINE SECURITIES, LLC       | 13,223     | 4,425     | 2.99         |
| STOCKPILE INVESTMENTS, INC.     | 9,262      | 4,190     | 2.21         |
| INTERACTIVE BROKERS LLC         | 2,398      | 2,398     | 1.00         |
| HRT EXECUTION SERVICES LLC      | 36,873     | 1,848     | 19.95        |
| De Minimis Firms                | 510,711    | 1,671     | 305.63       |
| COWEN AND COMPANY               | 315,498    | 1,205     | 261.82       |
| CLEAR STREET LLC                | 104,588    | 1,041     | 100.47       |
|                                 |            |           |              |
| Total                           | 76,529,930 | 2,960,633 | 25.85        |

Look at the top trader of the week...

During the week when the GME price suddenly dropped from 348 to 172 in a matter of minutes, **Robinhood** was the top OTC trader and had exactly **1.00 shares/trade**...

Table 10: Week of 3/15/2021 by Number of OTC Trades

| Week of 3/15/2021 by Trades      | Shares     | Trades    | Shares/Trade |
|----------------------------------|------------|-----------|--------------|
| VIRTU AMERICAS LLC               | 15,992,280 | 368,018   | 43.46        |
| CITADEL SECURITIES LLC           | 13,090,779 | 337,874   | 38.74        |
| <b>ROBINHOOD SECURITIES, LLC</b> | 297,276    | 297,194   | 1.00         |
| G1 EXECUTION SERVICES, LLC       | 4,218,976  | 142,948   | 29.51        |
| TWO SIGMA SECURITIES, LLC        | 2,026,245  | 113,810   | 17.80        |
| JANE STREET CAPITAL, LLC         | 2,581,334  | 76,816    | 33.60        |
| UBS SECURITIES LLC               | 2,265,783  | 29,541    | 76.70        |
| NATIONAL FINANCIAL SERVICES LLC  | 17,537     | 17,536    | 1.00         |
| COMHAR CAPITAL MARKETS, LLC      | 837,028    | 13,704    | 61.08        |
| De Minimis Firms                 | 649,333    | 4,349     | 149.31       |
| STOCKPILE INVESTMENTS, INC.      | 3,958      | 1,758     | 2.25         |
| Total                            | 41,980,529 | 1,403,548 | 29.91        |

Robinhood was busy again during the week of 3/15

**Robinhood** stepped up again with some serious high frequency OTC trading. Did anything happen that week? Oh yeah, the GME price experienced a huge drop from **280 to 210** on **3/15** and then to around **172** on **3/16**. They didn't switch things up at all from their previous attacks. **297,276 shares** traded **297,194 times** for an average of **1.00 shares/trade**.

| Week of 3/22/21 By Trades       | Shares     | Trades    | Shares/Trade |
|---------------------------------|------------|-----------|--------------|
| VIRTU AMERICAS LLC              | 19,014,998 | 399,802   | 47.56        |
| CITADEL SECURITIES LLC          | 14,661,892 | 350,723   | 41.80        |
| ROBINHOOD SECURITIES, LLC       | 267,095    | 266,981   | 1.00         |
| G1 EXECUTION SERVICES, LLC      | 4,766,416  | 142,289   | 33.50        |
| TWO SIGMA SECURITIES, LLC       | 2,645,822  | 119,800   | 22.09        |
| JANE STREET CAPITAL, LLC        | 2,714,662  | 84,204    | 32.24        |
| UBS SECURITIES LLC              | 2,719,052  | 31,196    | 87.16        |
| NATIONAL FINANCIAL SERVICES LLC | 18,651     | 18,644    | 1.00         |
| COMHAR CAPITAL MARKETS, LLC     | 839,368    | 14,971    | 56.07        |
| De Minimis Firms                | 744,245    | 2,803     | 265.52       |
| DRIVEWEALTH INSTITUTIONAL LLC   | 127,782    | 2,312     | 55.27        |
| STOCKPILE INVESTMENTS, INC.     | 3,970      | 1,362     | 2.91         |
| HRT EXECUTION SERVICES LLC      | 44,908     | 1,323     | 33.94        |
| Total                           | 48.568.861 | 1.436.410 | 33.81        |

Back at it like a bad habit...

And just in case you had any lingering doubts, the data from 3/22 shows us more of the same high frequency OTC trading from Robinhood. **267,095** shares traded **266,981 times** for an average of **1.00** shares/trade.

Since **Robinhood** entered the OTC marketplace on the week of 2/8/2021, they have made **2.357 million trades** with **2.362 million shares**, for an average of exactly **1.00 shares/trade**. Thanks Robinhood! They are really staying true to their mission of "**democratizing finance for all**".

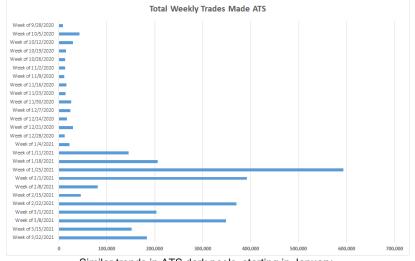
## And just so we don't completely neglect the ATS dark pools

#### Table 11: Weekly ATS Data

| ATS Data           |            |         |              | Week of 12/14/2020 | 3,104,483 | 16,397 | 189.33 |
|--------------------|------------|---------|--------------|--------------------|-----------|--------|--------|
|                    | Shares     | Trades  | Shares/Trade | Week of 12/7/2020  | 4,150,662 | 23,690 | 175.21 |
| Week of 3/22/2021  | 10,272,415 | 183,159 | 56.08        | Week of 11/30/2020 | 4,711,742 | 25,883 | 182.04 |
| Week of 3/15/2021  | 7,111,156  | 152,114 | 46.75        | Week of 11/23/2020 | 2,360,074 | 13,595 | 173.60 |
| Week of 3/8/2021   | 15,948,099 | 348,272 | 45.79        | Week of 11/16/2020 | 2,542,870 | 16,050 | 158.43 |
| Week of 3/1/2021   | 10,322,290 | 203,512 | 50.72        | Week of 11/9/2020  | 1,821,048 | 11,577 | 157.30 |
| Week of 2/22/2021  | 18,960,413 | 370,347 | 51.20        | Week of 11/2/2020  | 1,901,811 | 13,204 | 144.03 |
| Week of 2/15/2021  | 3,905,721  | 45,227  | 86.36        | Week of 10/26/2020 | 2,489,415 | 13,357 | 186.38 |
| Week of 2/8/2021   | 6,997,461  | 80,593  | 86.82        | Week of 10/19/2020 | 3,625,621 | 14,803 | 244.92 |
| Week of 2/1/2021   | 17,913,654 | 392,399 | 45.65        | Week of 10/12/2020 | 4,814,628 | 29,518 | 163.11 |
| Week of 1/25/2021  | 44,126,023 | 593,161 | 74.39        | Week of 10/5/2020  | 9,438,647 | 43,353 | 217.72 |
| Week of 1/18/2021  | 29,392,454 | 206,476 | 142.35       | Week of 9/28/2020  | 1,528,266 | 8,314  | 183.82 |
| Week of 1/11/2021  | 22,330,904 | 145,558 | 153.42       |                    |           |        |        |
| Week of 1/4/2021   | 3,458,092  | 21,807  | 158.58       |                    |           |        |        |
| Veek of 12/28/2020 | 1,876,336  | 12,173  | 154.14       |                    |           |        |        |
| Veek of 12/21/2020 | 4,900,689  | 28,967  | 169.18       |                    |           |        |        |

GME Weekly ATS Data showing decreased shares/trade since week of January 25th

#### Figure 9: Weekly Number of Trades on ATS



#### Similar trends in ATS dark pools, starting in January

#### List of Unanswered Questions:

Was there any significance to the high level of OTC trading during the week of 10/5?

How do all the pieces fit together?

Why did National Financial Services (Fidelity?) join the OTC fray in January?

Was the increase in high frequency OTC trading from **Robinhood** during the week of **3/8** in any way related to the massive drop in GME price on **3/10**? What about **3/15** and **3/16**?

What in the actual hell is going on behind the scenes to allow this kind of OTC trading to continue, undisturbed, for almost 3 months?

Who might be willing to do something with this data?

I'll continue to update this list.

As for me - my shares aren't for sale. Seeing the desperate behind-the-scenes OTC shenanigans over the last 3 months only raises the floor. And I really like the stock.

**TLDR**: Here is a different way to look at the OTC GME data. It should be abundantly clear that what is going on in the OTC dark pools is extremely abnormal. **Citadel** and **Virtu** market makers seem to be doing a whole lot of OTC trading. How did they get hundreds of millions of shares? What about **Two Sigma**? Why are the same entities trading so much volume so frequently in the OTC marketplace? Why did the number of shares / trade decrease so drastically beginning 1/25? Winter is coming. Are any of them wearing any clothes???

**Edit 2**: added the Weekly **3/15 Data** to show that **Robinhood** was highly active again at a time when GME experienced a huge price drop (see Table 10). Thanks <u>u/RecoveryChadX7R</u> !

**Edit 3**: Also, take a look at the DD posted by <u>u/Doom Douche</u> - <u>A Deep Dive into Dark Pool Trading</u> - which shows the difference between OTC trading for GME vs other stocks. And just note that his data used a GME float of 54.1 million rather than the 26.7 million (or less) that we can now deduce from the updated GME proxy, so the difference is even more pronounced.

Edit 4: Added some Charts (Figures 1-9).

Edit 5: Updated Tables and Figures with 3/22 weekly data

# The OTC Conspiracy (Part 2) - Shining Some Light into the Dark Pool data (March Update) - May 5, 2021

#### Due Diligence

I'll try to make this post short and sweet!

Please refer to my previous post (<u>The OTC Conspiracy</u>), which I updated with some charts and will continue to update with weekly data as it becomes available from the <u>FINRA OTC website</u>.

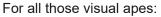
For this DD, I took a look at the monthly OTC data for GME vs 33 other "popular" stocks. I chose the stocks more or less at random based on Boomer-ism, personal interest, or stock price. I'd be happy to include some additional ticker requests in the next update.

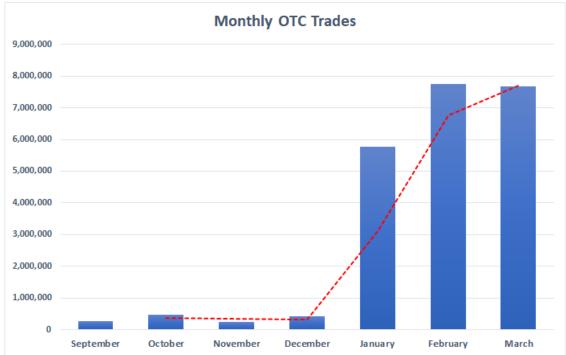
Let's start with the monthly OTC trading data for GME.

#### Table 1: GME Monthly OTC Data

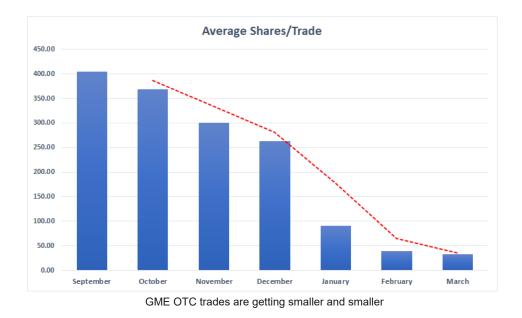
| Month     | Shares      | Trades    | Shares/Trade |
|-----------|-------------|-----------|--------------|
| September | 110,343,709 | 272,575   | 404.82       |
| October   | 175,908,562 | 477,193   | 368.63       |
| November  | 69,438,259  | 231,210   | 300.33       |
| December  | 110,569,834 | 420,166   | 263.16       |
| January   | 525,247,645 | 5,777,645 | 90.91        |
| February  | 302,110,234 | 7,740,859 | 39.03        |
| March     | 252,134,580 | 7,671,216 | 32.87        |

A major increase in number of OTC trades and a major decrease in average shares/trade





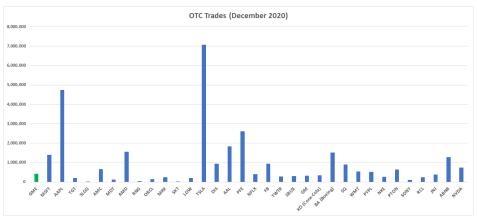
Increasing number of OTC trades



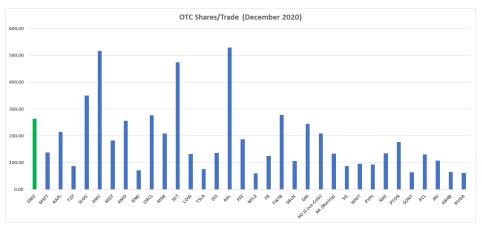
That's interesting. So an increasing number of smaller trades (aka **high frequency trading**). I wonder how these metrics compare to other stocks...

Let's start from the beginning.

# December 2020







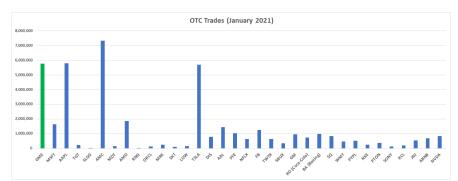
The number of shares/trade looks fairly typical compared to the rest

#### What about % of Float traded OTC in December?

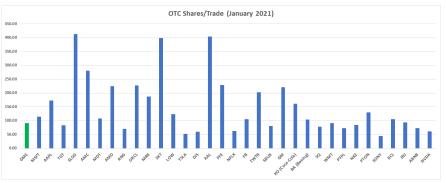


Over 410% of the GME float traded OTC in December

# January 2021

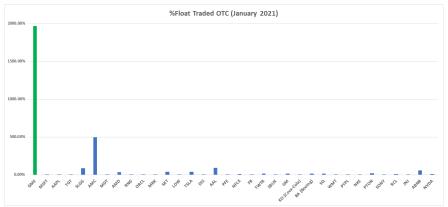


GME OTC trades markedly increased (13.75x) from December (420,166) to January (5,777,645). Only AMC, Tesla, and Apple had more OTC trades in January.



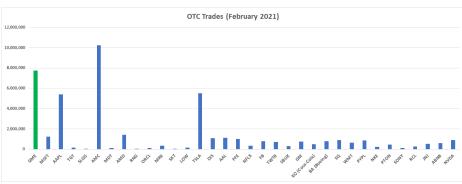
A substantial decrease in shares/trade, from 263 in December to 90 in January

#### What about % of Float traded OTC in January?



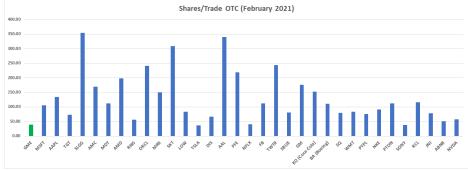
Little bit of an outlier, with almost 2000% of the GME float traded OTC in January

# February 2021



Another increase in the number of trades made OTC. Only AMC had more.

Only AMC had more OTC trades than GME in February 2021.



Further decrease in the number of shares/trade, from 90 in January to 39 in February

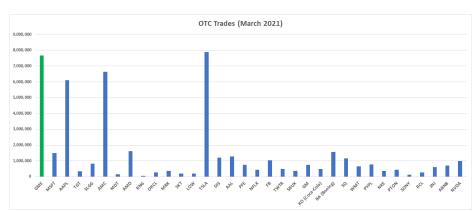
Only Tesla (36.42) and Sony (37.9) had lower shares/trade than GME (39.0) in the OTC marketplace in February.

What about % of Float traded OTC in February?



Still an outlier, with over 1130% of the GME float traded OTC

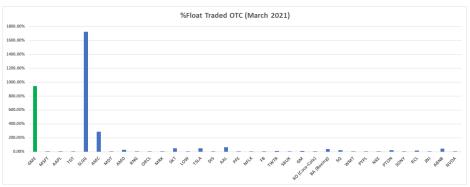
# March 2021



Only Tesla (7.89 million) had more OTC trades than GME (7.67 million) in March

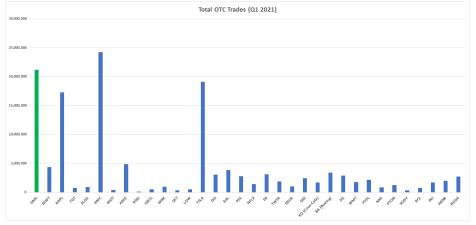


GME (32.87) had the lowest shares/trade of any stock in March



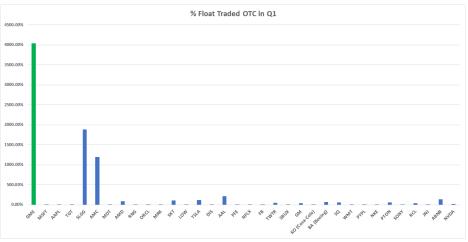
Only SLGG (1724%) had higher % of Float traded OTC than GME (944%)

## Let's add January, February, and March OTC Trades to get Q1 2021 Total



Only AMC (24.2 million) had more OTC trades than GME (21.2 million) in 2021

# And what was the % of Float traded OTC in Q1?



Over 4000% of the GME float was traded OTC in Q1. SLGG and AMC were also over 1000%

#### Table 2:

| Month     | Shares      | Trades    | Shares/Trade | %Float Traded OTC |
|-----------|-------------|-----------|--------------|-------------------|
| September | 110,343,709 | 272,575   | 404.82       | 413.27%           |
| October   | 175,908,562 | 477,193   | 368.63       | 658.83%           |
| November  | 69,438,259  | 231,210   | 300.33       | 260.07%           |
| December  | 110,569,834 | 420,166   | 263.16       | 414.12%           |
| January   | 525,247,645 | 5,777,645 | 90.91        | 1967.22%          |
| February  | 302,110,234 | 7,740,859 | 39.03        | 1131.50%          |
| March     | 252,134,580 | 7,671,216 | 32.87        | 944.32%           |

Putting it all together

# Conclusions

Please take a look at my previous post (<u>The OTC Conspiracy</u>) for a more in-depth dive into the weekly OTC data. It also includes a breakdown of the major players in the OTC marketplace. I will continue to update that post as data is released.

The purpose of this post was to compare the OTC trading of GME vs some other "popular" stocks.

- The number of monthly GME OTC trades increased over 28x from September 2020 to March 2021.
- The average shares/trade has decreased every month, from over 400 shares/trade in September to 32 shares/trade in March.
- Only **GME**, **Tesla**, and **Sony** averaged less than 40 shares/trade in a month. GME has done it twice each of the last two months.
- The 32.87 shares/trade average in March was the lowest for any stock across any month.
- The % of GME float traded OTC has been over **260%** every month since September 2020 and increased to almost **2000%** in January 2021.
- In February, another **1131%** of the GME float was traded in OTC, followed by **944%** in March.
- The % of float traded OTC is much higher for GME than any of the other stocks that were evaluated. The only exception was **SLGG (1724%** in March). Shout out to the sluggs!
- Besides GME (and SLGG in March), only AMC had more than **100%** of float traded OTC in any month.
- If we look at **Q1 data**, over **4043%** of the GME float was traded OTC in **Q1** alone.
- In Q1, only AMC (24.2 million) had more OTC trades than GME (21.2 million).
- SLGG (1883%) and AMC (1195%) are the only other stocks with over **220%** of their floats traded OTC.
- Including SLGG and AMC, only 6 of the 33 stocks traded over **100%** of their floats OTC during Q1.
- 22 of the 33 had less than 40% of their floats traded OTC during Q1.

• 19 of the 33 had less than 20% of their floats traded OTC during Q1.

# Bananas for Thought

How did those sneaky Market Makers trade over 4000% of the GME float on just the OTC marketplace during Q1?

What about those diehard, diamond-handed apes who have been holding bananas since 2020?

Why have we seen a progressive decrease in GME volume every month?

- 1.26 billion in January
- 827.56 million in February
- 679.79 million in March
- 172.43 million in April
- Record lows in May ...

Is the banana factory broken? Are all of the bananas finally drying up?

Where did they come up with the 172.43 million additional shares that were traded in April?

What about those April options contracts? Tick tock...

How many bananas did they "produce" in their factory?

And how many bananas are they now going to have to buy back???!!!

OoOoOoOoOo I think they naked...

TLDR: Buy, HODL, Vote --> tendies!!! (not financial advice)

#### Appendix

OTC Data January - March 2021 (December didn't really fit)

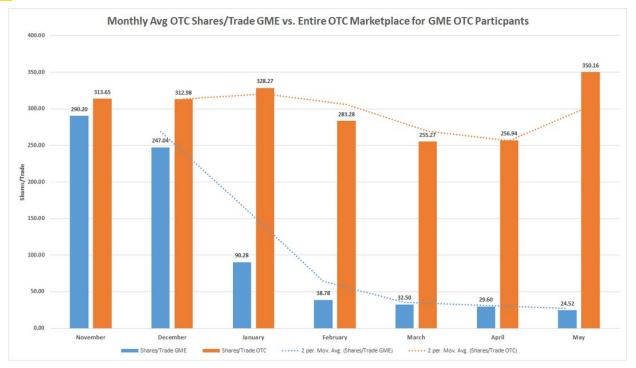
|                | March         |           |              |            | February      |            |              |            | January       |           |              |            | Float          |            |
|----------------|---------------|-----------|--------------|------------|---------------|------------|--------------|------------|---------------|-----------|--------------|------------|----------------|------------|
| Symbol         | Shares        | Trades    | Shares/Trade | %Float OTC | Shares        | Trades     | Shares/Trade | %Float OTC | Shares        | Trades    | Shares/Trade | %Float OTC |                | % Float Q1 |
| GME            | 252,134,580   | 7,671,216 | 32.87        | 944.32%    | 302,110,234   | 7,740,859  | 39.03        | 1131.50%   | 525,247,646   | 5,777,646 | 90.91        | 1967.22%   | 26,700,000     | 4043.04%   |
| MSFT           | 153,074,852   | 1,502,587 | 101.87       | 2.05%      | 131,086,299   | 1,238,715  | 105.82       | 1.76%      | 187,592,012   | 1,638,311 | 114.50       | 2.51%      | 7,460,000,000  | 6.32%      |
| AAPL           | 1,003,915,829 | 6,104,670 | 164.45       | 6.08%      | 730,058,578   | 5,417,171  | 134.77       | 4.42%      | 1,001,461,355 | 5,788,951 | 173.00       | 6.06%      | 16,520,000,000 | 16.56%     |
| TGT            | 26,826,106    | 349,149   | 76.83        | 5.40%      | 12,452,883    | 169,409    | 73.51        | 2.51%      | 19,439,673    | 232,021   | 83.78        | 3.91%      | 496,960,000    | 11.82%     |
| SLGG           | 315,743,372   | 834,778   | 378.24       | 1724.43%   | 13,201,726    | 37,231     | 354.59       | 72.10%     | 15,943,538    | 38,628    | 412.75       | 87.08%     | 18,310,000     | 1883.61%   |
| AMC            | 1,195,984,178 | 6,643,303 | 180.03       | 286.34%    | 1,730,624,527 | 10,245,769 | 168.91       | 414.34%    | 2,066,125,448 | 7,342,220 | 281.40       | 494.67%    | 417,680,000    | 1195.35%   |
| MDT            | 19,033,860    | 145,112   | 131.17       | 1.41%      | 15,354,202    | 136,618    | 112.39       | 1.14%      | 15,777,789    | 146,102   | 107.99       | 1.17%      | 1,350,000,000  | 3.72%      |
| AMD            | 360,838,285   | 1,608,197 | 224.37       | 29.82%     | 283,771,593   | 1,435,488  | 197.68       | 23.45%     | 417,089,199   | 1,853,392 | 225.04       | 34.47%     | 1,210,000,000  | 87.74%     |
| RNG            | 3,425,183     | 48,252    | 70.99        | 4.33%      | 2,243,082     | 39,428     | 56.89        | 2.83%      | 2,090,809     | 29,770    | 70.23        | 2.64%      | 79,170,000     | 9.80%      |
| ORCL           | 68,881,104    | 258,872   | 266.08       | 3.96%      | 31,907,724    | 132,212    | 241.34       | 1.83%      | 29,415,301    | 129,341   | 227.42       | 1.69%      | 1,740,000,000  | 7.48%      |
| MRK            | 69,947,193    | 374,060   | 186.99       | 2.76%      | 50,863,838    | 338,598    | 150.22       | 2.01%      | 46,895,256    | 251,066   | 186.78       | 1.85%      | 2,530,000,000  | 6.63%      |
| SKT            | 50,413,278    | 195,723   | 257.57       | 51.93%     | 17,416,426    | 56,432     | 308.63       | 17.94%     | 38,427,979    | 96,407    | 398.60       | 39.59%     | 97,070,000     | 109.47%    |
| LOW            | 19,794,742    | 208,758   | 94.82        | 2.76%      | 14,340,380    | 172,390    | 83.19        | 2.00%      | 18,590,487    | 150,724   | 123.34       | 2.59%      | 716,680,000    | 7.36%      |
| TSLA           | 391,103,892   | 7,892,395 | 49.55        | 50.50%     | 201,529,180   | 5,532,975  | 36.42        | 26.02%     | 296,482,290   | 5,702,561 | 51.99        | 38.28%     | 774,490,000    | 114.80%    |
| DIS            | 70,628,438    | 1,198,983 | 58.91        | 3.90%      | 71,134,445    | 1,076,457  | 66.08        | 3.93%      | 46,351,642    | 776,776   | 59.67        | 2.56%      | 1,810,000,000  | 10.39%     |
| AAL            | 431,230,962   | 1,286,215 | 335.27       | 67.97%     | 378,312,410   | 1,113,309  | 339.81       | 59.63%     | 582,882,185   | 1,439,879 | 404.81       | 91.88%     | 634,420,000    | 219.48%    |
| PFE            | 189,026,962   | 741,515   | 254.92       | 3.39%      | 218,957,508   | 998,853    | 219.21       | 3.92%      | 237,463,057   | 1,039,893 | 228.35       | 4.26%      | 5,580,000,000  | 11.57%     |
| NFLX           | 18,713,144    | 439,680   | 42.56        | 4.29%      | 14,298,903    | 346,751    | 41.24        | 3.28%      | 40,877,591    | 650,563   | 62.83        | 9.37%      | 436,220,000    | 16.94%     |
| FB             | 136,884,043   | 1,030,943 | 132.78       | 5.75%      | 89,878,509    | 802,628    | 111.98       | 3.78%      | 133,686,967   | 1,262,981 | 105.85       | 5.62%      | 2,380,000,000  | 15.14%     |
| TWTR           | 111,383,783   | 491,736   | 226.51       | 14.34%     | 176,899,531   | 727,551    | 243.14       | 22.78%     | 129,746,056   | 641,102   | 202.38       | 16.71%     | 776,580,000    | 53.83%     |
| SBUX           | 31,834,408    | 367,794   | 86.55        | 2.70%      | 23,804,428    | 294,400    | 80.86        | 2.02%      | 29,165,942    | 358,867   | 81.27        | 2.47%      | 1,180,000,000  | 7.19%      |
| GM             | 162,018,745   | 753,299   | 215.08       | 11.83%     | 131,498,875   | 750,012    | 175.33       | 9.60%      | 212,706,926   | 963,843   | 220.69       | 15.53%     | 1,370,000,000  | 36.95%     |
| KO (Coca-Cola) | 86,030,866    | 491,974   | 174.87       | 2.01%      | 75,274,918    | 494,798    | 152.13       | 1.76%      | 120,820,905   | 748,740   | 161.37       | 2.82%      | 4,280,000,000  | 6.59%      |
| BA (Boeing)    | 238,127,619   | 1,578,187 | 150.89       | 40.77%     | 89,499,638    | 809,309    | 110.59       | 15.32%     | 104,040,248   | 993,807   | 104.69       | 17.81%     | 584,060,000    | 73.91%     |
| SQ             | 98,460,764    | 1,168,505 | 84.26        | 25.60%     | 71,882,078    | 900,779    | 79.80        | 18.69%     | 64,514,527    | 830,891   | 77.64        | 16.77%     | 384,670,000    | 61.05%     |
| WMT            | 59,455,076    | 666,170   | 89.25        | 4.16%      | 54,167,852    | 650,155    | 83.32        | 3.79%      | 42,712,586    | 465,345   | 91.79        | 2.99%      | 1,430,000,000  | 10.93%     |
| PYPL           | 47,406,715    | 768,103   | 61.72        | 4.05%      | 65,806,280    | 866,224    | 75.97        | 5.62%      | 37,700,526    | 513,551   | 73.41        | 3.22%      | 1,170,000,000  | 12.90%     |
| NKE            | 38,287,515    | 364,443   | 105.06       | 3.11%      | 22,076,399    | 240,441    | 91.82        | 1.79%      | 21,710,478    | 256,033   | 84.80        | 1.77%      | 1,230,000,000  | 6.67%      |
| PTON           | 57,674,383    | 438,478   | 131.53       | 22.82%     | 50,690,864    | 450,409    | 112.54       | 20.05%     | 48,073,786    | 369,216   | 130.21       | 19.02%     | 252,780,000    | 61.89%     |
| SONY           | 5,853,371     | 117,414   | 49.85        | 0.47%      | 5,119,412     | 135,059    | 37.91        | 0.41%      | 5,238,476     | 118,095   | 44.36        | 0.42%      | 1,240,000,000  | 1.31%      |
| RCL            | 33,508,339    | 276,878   | 121.02       | 15.34%     | 31,433,895    | 271,083    | 115.96       | 14.39%     | 20,430,753    | 192,546   | 106.11       | 9.36%      | 218,390,000    | 39.09%     |
| JNJ            | 41,495,778    | 597,774   | 69.42        | 1.58%      | 43,028,710    | 548,396    | 78.46        | 1.64%      | 51,120,936    | 548,335   | 93.23        | 1.94%      | 2,630,000,000  | 5.16%      |
| ABNB           | 40,048,624    | 714,024   | 56.09        | 46.40%     | 31,370,064    | 617,940    | 50.77        | 36.35%     | 50,058,445    | 683,210   | 73.27        | 58.00%     | 86,310,000     | 140.75%    |
| NVDA           | 53,827,159    | 1,000,339 | 53.81        | 9.02%      | 52,588,061    | 915,594    | 57.44        | 8.81%      | 51,281,611    | 827,060   | 62.00        | 8.60%      | 596,640,000    | 26.43%     |

### Edit 1: Added January, February, and March to get Q1 2021 Data

Edit 2: Added Bananas for Thought

The OTC Conspiracy - This graph and data shows GME price is being manipulated by predatory, high frequency OTC and Off-Exchange trading by Market Makers and Robinhood. I will try to put together a full DD by the end of the week. HODL!

#### Education



|                    | Total Weekly Volume | Total Volume OTC | Total Volume ATS | % of Total Traded Off-<br>Exchange (OTC + ATS) | % of Float Traded<br>** | % of Float Traded<br>Off-Exchange ** |
|--------------------|---------------------|------------------|------------------|--|-------------------------|--------------------------------------|
| Week of 5/17/2021  | 26,070,236          | 8,641,890        | 1,959,201        | 40.66%   | 44.53%                  | 18.11%                               |
| Week of 5/10/2021  | 25,389,796          | 8,097,919        | 1,850,964        | 39.18%   | 43.37%                  | 17.00%                               |
| Week of 5/3/2021   | 17,951,366          | 6,544,895        | 1,013,578        | 42 11%   | 30.67%                  | 12.91%                               |
| Week of 4/26/2021  | 33,447,581          | 12,807,571       | 2,094,608        | 44.55%   | 57.14%                  | 25.46%                               |
| Week of 4/19/2021  | 27,379,529          | 9,807,479        | 2,009,781        | 43.16%   | 46.77%                  | 20.19%                               |
| Week of 4/12/2021  | 57,700,098          | 28,330,524       | 4,940,816        | 49.00%   | 98.57%                  | 48.29%                               |
| Week of 4/5/2021   | 44,566,839          | 15,107,618       | 4,382,794        | 43.73%   | 76.13%                  | 33.29%                               |
| Week of 3/29/2021  | 44,865,279          | 18,499,623       | 3,033,910        | 48.00%   | 76.64%                  | 36.78%                               |
| Week of 3/22/2021  | 137,051,550         | 48,568,861       | 10,272,415       | 42.93%   | 234.13%                 | 100.51%                              |
| Week of 3/15/2021  | 112,607,860         | 70,118,713       | 7,111,156        | 68,58%   | 192.36%                 | 131.93%                              |
| Week of 3/8/2021   | 228,393,910         | 76,529,930       | 15,948,009       | 40.49%   | 390.15%                 | 157.97%                              |
| Week of 3/1/2021   | 156,191,450         | 70,118,715       | 10,322,290       | 48.40%   | 283.89%                 | 137.41%                              |
| Week of 2/22/2021  | 352,655,925         | 121,657,480      | 18,960,413       | 39.88%   | 602.42%                 | 240.23%                              |
| Week of 2/15/2021  | 56,254,625          | 21,554,348       | 3,905,721        | 45.26%   | 96.10%                  | 43.49%                               |
| Week of 2/8/2021   | 116,615,890         | 49,115,110       | 6,997,461        | 42.28%   | 199.21%                 | 95.85%                               |
| Week of 2/1/2021   | 302,036,020         | 109,775,296      | 17,913,654       | 42.28%   | 515.95%                 | 218.12%                              |
| Week of 1/25/2021  | 559,240,540         | 184,322,088      | 44,126,023       | 40.85%   | 955.31%                 | 390.24%                              |
| Week of 1/19/2021  | 352,431,360         | 170,039,730      | 29,392,454       | 55.03%   | 619.12%                 | 340.68%                              |
| Week of 1/11/2021  | 307,073,745         | 156,958,902      | 22,330,904       | 58.39%   | 524.55%                 | 306.27%                              |
| Week of 1/4/2021   | 33,651,411          | 13,926,925       | 3,458,092        | 51.66%   | 57.48%                  | 29.70%                               |
| Week of 12/28/2020 | 31,064,342          | 14,402,258       | 1,876,336        | 52.40%   | 53.07%                  | 27.81%                               |
| Week of 12/21/2020 | 72,656,282          | 35,405,726       | 4,900,689        | 55.48%   | 124.11%                 | 68.85%                               |
| Week of 12/14/2020 | 48,878,751          | 19,437,594       | 3,104,483        | 46.12%   | 83.50%                  | 38.51%                               |
| Week of 12/7/2020  | 62,920,148          | 26,137,279       | 4,150,662        | 48 14%   | 107.48%                 | 51 74%                               |
| Week of 11/30/2020 | 67,800,547          | 29,383,508       | 4,711,742        | 50.29%   | 115,82%                 | 58.24%                               |
| Week of 11/23/2020 | 38,158,975          | 16,841,977       | 2,360,074        | 50.32%   | 65.18%                  | 32.80%                               |
| Week of 11/16/2020 | 39,812,179          | 18,443,760       | 2,542,870        | 52.71%   | 68.01%                  | 35.85%                               |
| Week of 11/9/2020  | 22,855,460          | 7,868,516        | 1,821,048        | 42.39%   | 39.04%                  | 16.55%                               |
| Week of 11/2/2020  | 28,712,842          | 12,087,480       | 1,901,811        | 48.72%   | 49.05%                  | 23.90%                               |

|                   | Citadel Shares | Citadel Trades | Citadel Shares/Trade | Virtu Shares | Virtu Trades | Virtu Shares/Trade |
|-------------------|----------------|----------------|----------------------|--------------|--------------|--------------------|
| Week of 5/17/2021 | 3,693,994      | 85,681         | 43.11                | 2,815,384    | 68,679       | 40.99              |
| Week of 5/10/2021 | 3,354,403      | 104,801        | 32.01                | 2,398,072    | 77,588       | 30.91              |
| Week of 5/3/2021  | 2,709,300      | 92,398         | 29.32                | 1,920,356    | 67,828       | 28.31              |
| Week of 4/26/2021 | 5,178,592      | 115,231        | 44.94                | 4,114,214    | 95,587       | 43.04              |
| Week of 4/19/2021 | 3,838,332      | 115,470        | 33.24                | 3,195,142    | 96,017       | 33.28              |
| Week of 4/12/2021 | 8,771,644      | 198,440        | 44.20                | 7,945,869    | 175,303      | 45.33              |
| Week of 4/5/2021  | 5,712,951      | 151,334        | 37.75                | 4,922,223    | 131,517      | 37.43              |
| Week of 3/29/2021 | 7,021,363      | 136,845        | 51.31                | 5,907,702    | 118,632      | 49.80              |
| Week of 3/22/2021 | 14,661,892     | 350,723        | 41.80                | 19,014,998   | 399,802      | 47.56              |
| Week of 3/15/2021 | 13,090,779     | 337,874        | 38.74                | 15,992,280   | 368,018      | 43.46              |
| Week of 3/8/2021  | 23,908,440     | 681,265        | 35.09                | 29,256,853   | 723,074      | 40.46              |
| Week of 3/1/2021  | 22,298,959     | 388,993        | 57.32                | 28,532,932   | 405,242      | 70.41              |
| Week of 2/22/2021 | 39,259,675     | 739,295        | 53.10                | 52,451,996   | 927,612      | 56.55              |
| Week of 2/15/2021 | 7,887,651      | 118,457        | 66.59                | 8,552,670    | 100,028      | 85.50              |
| Week of 2/8/2021  | 18,848,780     | 298,575        | 63.13                | 19,222,124   | 251,804      | 76.34              |
| Week of 2/1/2021  | 49,720,491     | 1,496,739      | 33.22                | 35,786,520   | 711,870      | 50.27              |
| Week of 1/25/2021 | 92,991,756     | 1,983,757      | 46.88                | 43,388,647   | 1,205,460    | 35.99              |
| Week of 1/19/2021 | 80,131,562     | 351,241        | 228.14               | 44,777,619   | 293,688      | 152.47             |
| Week of 1/11/2021 | 73,156,206     | 203,633        | 359.26               | 44,448,707   | 247,026      | 179.94             |
| Week of 1/4/2021  | 5,936,322      | 19,056         | 311.52               | 4,131,948    | 27,863       | 148.30             |

|                   | Robinhood Shares        | Robinhood Trades | RH Shares/Trade |  |
|-------------------|-------------------------|------------------|-----------------|--|
| Week of 5/17/2021 | 48,124                  | 48,117           | 1.00            |  |
| Week of 5/10/2021 | 54,703                  | 54,677           | 1.00            |  |
| Week of 5/3/2021  | 55,247                  | 55,242           | 1.00            |  |
| Week of 4/26/2021 | 73,804                  | 73,803           | 1.00            |  |
| Week of 4/19/2021 | 73,390                  | 73,373           | 1.00            |  |
| Week of 4/12/2021 | 129,402                 | 129,381          | 1.00            |  |
| Week of 4/5/2021  | 99,780                  | 99,772           | 1.00            |  |
| Week of 3/29/2021 | eek of 3/29/2021 90,487 |                  | 1.00            |  |
| Week of 3/22/2021 | 267,095                 | 266,981          | 1.00            |  |
| Week of 3/15/2021 | 297,276                 | 297,194          | 1.00            |  |
| Week of 3/8/2021  | 765,811                 | 763,327          | 1.00            |  |
| Week of 3/1/2021  | 257,412                 | 257,315          | 1.00            |  |
| Week of 2/22/2021 | 757,954                 | 755,424          | 1.00            |  |
| Week of 2/15/2021 | 14,983                  | 14,907           | 1.01            |  |
| Week of 2/8/2021  | 1,678                   | 1,675            | 1.00            |  |
| Week of 2/1/2021  |                         |                  |                 |  |
| Total             | 2,987,146               | 2,981,666        | 1.0018379       |  |

|                   | Two Sigma Shares | Two Sigma Trades | Two Sigma Shares/Trade | G1 Shares                 | G1 Trades | G1 Shares/Trade |
|-------------------|------------------|------------------|------------------------|---------------------------|-----------|-----------------|
| Week of 5/17/2021 | 421,285          | 21,486           | 19.61                  | 556,217                   | 20,618    | 26.98           |
| Week of 5/10/2021 | 404,022          | 25,078           | 16.11                  | 883,209                   | 36,524    | 24.18           |
| Week of 5/3/2021  | 442,029          | 23,444           | 18.85                  | 883,209                   | 36,524    | 24.18           |
| Week of 4/26/2021 | 218,754          | 18,759           | 11.66                  | 768,998                   | 32,574    | 23.61           |
| Week of 4/19/2021 | 520,516          | 24,581           | 21.18                  | 1,318,367                 | 37,779    | 34.90           |
| Week of 4/12/2021 | 1,071,302        | 54,895           | 19.52                  | 2,583,516                 | 76,212    | 33.90           |
| Week of 4/5/2021  | 726,153          | 44,149           | 16.45                  | 1,687,284                 | 57,073    | 29.56           |
| Week of 3/29/2021 | 1,088,636        | 43,290           | 25.15                  | 1,635,995                 | 48,950    | 33.42           |
| Week of 3/22/2021 | 2,645,822        | 119,800          | 22.09                  | 4,766,416                 | 142,289   | 33.50           |
| Week of 3/15/2021 | 2,026,245        | 113,810          | 17.80                  | 4,218,976                 | 142,948   | 29.51           |
| Week of 3/8/2021  | 4,149,293        | 229,172          | 18.11                  | 7,606,670                 | 288,151   | 26.40           |
| Week of 3/1/2021  | 3,463,047        | 119,209          | 29.05                  | 6,631,980                 | 157,625   | 42.07           |
| Week of 2/22/2021 | 5,393,608        | 221,579          | 24.34                  | 11,598,219                | 289,751   | 40.03           |
| Week of 2/15/2021 | 1,032,460        | 34,826           | 29.65                  | 1,680,471                 | 43,035    | 39.05           |
| Week of 2/8/2021  | 2,372,217        | 94,006           | 25.23                  | 2,960,287                 | 114,354   | 25.89           |
| Week of 2/1/2021  | 3,710,208        | 354,234          | 10.47                  | 10,268,777                | 507,820   | 20.22           |
| Week of 1/25/2021 | 4,379,714        | 309,797          | 14.14                  | 22,258,085                | 388,250   | 57.33           |
| Week of 1/19/2021 | 2,820,550        | 44,620           | 63.21                  | 28,034 <mark>,</mark> 417 | 85,673    | 327.23          |
| Week of 1/11/2021 | 3,024,572        | 25,886           | 116.84                 | 24,381,517                | 57,490    | 424.10          |
| Week of 1/4/2021  | 389,827          | 5,168            | 75.43                  | 1,698,466                 | 5,498     | 308.92          |

\*\*\*\* \*\*\*\*\*\* \*\*\*\* \*\*\*\*\*\* \*\*\*\* \*\*\*\*\*\* \*\*\*\*\* \*\*\*\*\*\*\* \*\*\*\* \*\*\*\* \*\*\*\*\*\* \*\*\*\* \*\*\*\*\*\* \*\*\*\*\* \*\*\*\* \*\*\*\*\*\* \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\* \*\*\*\*\*\*\* \*\*\*\* \*\*\*\* \*\*\*\* \*\*\*\*\*\* \*\*\*\*\*\*\*\*\*\*\*\* \*\*\*\*\*\* \*\*\*\*