

Disclosure of Order Execution and Routing Practices (SEC Rule 606)

Orion Trading, LLC. ("Orion Trading") is a fully disclosed broker/dealer and member of [FINRA](#) and [SIPC](#). Orion Trading, LLC. is based in Orlando, Florida.

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The Securities and Exchange Commission adopted Exchange Act Rule 606 (the "Rule," formerly Rule 11Ac16) in November 2000; the rule became effective on July 2, 2001. The Rule states that all broker dealers that route client orders for execution to market centers or through automated order entry systems on primary exchanges must make publicly available, on a quarterly basis, reports that present a general overview of their routing practices. These reports must identify the market centers (exchanges, automated order entry systems, market makers, etc.) to which non-directed customer orders were routed for execution. Broker/dealers must also disclose the material aspects of the broker/dealer's relationship with such venues during the applicable quarter.

Orion Trading relies exclusively upon Penson Financial Services, Inc. ("Penson") for order routing. Pursuant to the Rule, Penson is required to make publicly available a quarterly report with regard to routing its non-directed orders. For the purpose of the Rule, Penson has entered into an agreement with Quantum5 Market Surveillance, a division of S3 Matching Technologies, to disclose all required information pertaining to the Rule.

Please click on the following link to view the most recent quarterly report for Penson: <ftp://public.s3.com/11ac1-6/pfsi>

For more information on SEC Rule 606, please visit the Securities and Exchange Commission website at:

<http://www.sec.gov/divisions/marketreg/disclosure.htm>

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