



SEC Rule 606 Disclosure of Order Routing Information (Formerly known as Rule 11Ac1-6)

4th Quarter of 2019

SEC Rule 606 of Regulation NMS, requires all broker-dealers, including Carnes Capital Corporation (“Carnes”), to provide statistical information on a quarterly basis regarding order routing practices pertaining to customer orders in NYSE, NASDAQ, and NYSE Amex securities as well as (when applicable) listed options. Carnes has made every attempt to prepare these statistics in compliance with the SEC’s rules. However, these statistics have not been audited and may contain errors. Carnes does not represent, warrant, or guarantee that the statistics are accurate. From time to time Carnes may become aware of systems or other errors that may affect the data or results reflected in its report but which cannot be corrected before publication. Carnes may, in its discretion, revise and republish this report and/or previous reports for prior periods. Carnes disclaims liability for any direct, indirect, punitive, special, consequential, or incidental damages related to the statistics or the use of such. The information provided in the reports may be impacted by market data system outages or errors, both internal and external, and it is dependent upon the integrity and accuracy of data provided by outside sources. Certain assumptions have been made in preparing the statistics, and changes to the assumptions may have a material impact on results. The statistics do not endorse or recommend any particular security or market participant.

Carnes takes into consideration many factors when determining where to route customer orders. These include, but are not limited to, opportunities for price improvement, speed of execution, liquidity, order confidentiality, market depth, and order size. Carnes actively monitors the primary execution venues utilized and routes orders to venues that have provided consistent, high-quality executions over time.

Carnes cleared through J.P. Morgan Clearing Corp. on a fully disclosed basis through June 5th, 2015 and now clears through National Financial Services LLC (“NFS”).

Because Carnes routes customer orders to its clearing firm, NFS, and other execution venues that further route the orders to other trading venues, it is adopting the clearing and other execution venues’ Rule 606 order routing disclosures since they fairly represent the routing statistics customers can expect with a standard order.

NFS

https://clearingcustody.fidelity.com/app/item/RD_13569_21696/sec-rule-606.html

Virtu Americas, LLC

<https://www.virtu.com/about/transparency/rule-605-and-606-reporting/>

Carnes receives no payment for order flow, profit-sharing, or rebates for routing customer orders to NFS. Rather, Carnes pays a fixed fee (per share executed) to NFS for NFS’s order routing and execution services. Carnes can receive reductions in its execution charges from Virtu Americas LLC (formerly Knight Direct) (“Virtu”) in the form of rebates for routing customer orders that add liquidity to certain market centers. Currently, the maximum rebate offered by any market center available to Carnes is \$0.003 per share. However,

Carnes' execution charges on a monthly basis have always exceeded the rebates or credits it has received. Nearly all of Carnes' orders that are routed to Virtu are routed for execution using a smart order router or algorithmic trading tool. Consequently, Carnes is typically not aware of the market center where customer orders have been executed until the trades are completed. In no instance does Carnes preference a particular market center for the purpose of capturing rebates. Carnes may also receive research and/or market intelligence information from broker-dealers who receive order flow from Carnes.

If you have any questions regarding Carnes' order routing practices, please call Jano Janoyan, Carnes' CEO. He can be reached at (239) 254-2534.