Odeon Capital Group LLC - Held NMS Stocks and Options Order Routing Public Report Generated on Tue Jul 30 2024 08:03:38 GMT-0400 (Eastern Daylight Time)

2nd Quarter, 2024

April 2024

S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
0.00	0.00	0.00	0.00	0.00

Venues

V	enue -	Non-	Market	Marketable	Non-	Other	Net Payment	Net Payment Paid/	Net Payment Paid/	Net Payment Paid/	Net Payment Paid/	Net Payment Paid/	Net Payment	Net Payment Paid/
	Non-	Directed	Orders	Limit Orders	Marketable	Orders	Paid/Received for	Received for Market	Received for	Received for	Received for Non-	Received for Non-	Paid/Received for	Received for Other
di	irected	Orders (%)	(%)	(%)	Limit Orders	(%)	Market	Orders(cents per	Marketable Limit	Marketable Limit	Marketable Limit	Marketable Limit	Other	Orders(cents per
	Order	, ,	, ,	, ,	(%)		Orders(USD)	hundred shares)	Orders(USD)	Orders(cents per	Orders(USD)	Orders(cents per	Orders(USD)	hundred shares)
	Flow									hundred shares)		hundred shares)		

April 2024

Non-S&P 500 Stocks

Summary

Non-Directed Orde as % of All Orders	-	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
0	00	0.00	0.00	0.00	0.00

Venues

Venue - Non- directed Order Flow	Directed Orders	Marketable Limit Orders (%)	cted Orders		Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
--	-----------------	-----------------------------------	-------------	--	------------------------	---	---	--	--	---	---	--	--

April 2024

Options

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders	
100.00	0.00	0.00	0.00	100.00	

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
DASH FINIANCIAL TECHNOLOGIES LLC (DFIN)	53.94	0.00	0.00	0.00	53.94	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	582.3725	0.0518
TRADEMAS INC. (WALL)	32.37	0.00	0.00	0.00	32.37	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	282.6000	0.0013
ODEON CAPITAL GROUP LLC (ODNC)	4.98	0.00	0.00	0.00	4.98	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Material Aspects:

DASH FINIANCIAL TECHNOLOGIES LLC (DFIN):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provided so odeon with a rebate or similar payment, such payments: (i) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (ii)not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any rebates or similar payments that Odeon may receive.

TRADEMAS INC. (WALL):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provided some provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (ii) not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any rebates or similar payments that Odeon may receive.

ODEON CAPITAL GROUP LLC (ODNC):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provideds odeon with a rebate or similar payments; (ii) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (ii) not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any receive.

May 2024

S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
--	--	--	---

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
0.00	0.00	0.00	0.00	0.00

Venues

Venue - Non- directed Order Flow		Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
--	--	-------------------------	-----------------------------------	---	------------------------	---	---	--	--	---	---	--	--

May 2024

Non-S&P 500 Stocks

Summary

	Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders			Other Orders as % of Non-Directed Orders
1	0.00	0.00	0.00	0.00	0.00

Venues

Venue - Non- directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
--	--------------------------------	-------------------------	-----------------------------------	---	------------------------	---	---	--	--	---	---	--	--

May 2024

Options

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	0.00	0.00	0.00	100.00

Venues

Venue - Non-directed Order Flow		Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
---------------------------------------	--	-------------------------	-----------------------------------	---	------------------------	---	---	--	--	---	---	--	--

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
DASH FINIANCIAL TECHNOLOGIES LLC (DFIN)	47.15	0.00	0.00	0.00	47.15	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	-329.4950	-0.0254
TRADEMAS INC. (WALL)	35.16	0.00	0.00	0.00	35.16	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	626.0000	0.0038
ODEON CAPITAL GROUP LLC (ODNC)	6.10	0.00	0.00	0.00	6.10	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Wall Street Access (WABR)	5.89	0.00	0.00	0.00	5.89	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Material Aspects:

DASH FINIANCIAL TECHNOLOGIES LLC (DFIN):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provided occording to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (ii) not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any receive.

TRADEMAS INC. (WALL):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provided so odeon with a rebate or similar payment, such payments: (i) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (iii) making order routing determinations wholly independently from any rebates or similar payments that Odeon may receive.

ODEON CAPITAL GROUP LLC (ODNC):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provides Odeon with a rebate or similar payments; (i) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (iii) making order routing determinations wholly independently from any rebates or similar payments that Odeon may receive.

Wall Street Access (WABR):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provides Odeon with a rebate or similar payment, such payments: (i) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (iii) not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any rebates or similar payments that Odeon may receive.

June 2024

S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
0.00	0.00	0.00	0.00	0.00

Venues

Venue - Non- directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)	
--	--------------------------------	-------------------------	-----------------------------------	---	------------------------	---	---	--	--	---	---	--	--	--

June 2024

Non-S&P 500 Stocks

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
0.00	0.00	0.00	0.00	0.00

Venues

Venue - Non- directed Order Flow	Non- Directed Ordo Orders (%) (%		Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
--	--	--	---	------------------------	---	---	--	--	---	---	--	--

June 2024

Options

Summary

Non-Directed Orders as % of All Orders	Market Orders as % of Non-Directed Orders	Marketable Limit Orders as % of Non- Directed Orders	Non-Marketable Limit Orders as % of Non- Directed Orders	Other Orders as % of Non-Directed Orders
100.00	0.00	0.00	0.00	100.00

Venues

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
TRADEMAS INC. (WALL)	40.48	0.00	0.00	0.00	40.48	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	11,819.3300	0.0846
DASH FINIANCIAL TECHNOLOGIES LLC (DFIN)	39.28	0.00	0.00	0.00	39.28	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	-1,290.6500	-0.1226
Wall Street Access (WABR)	12.63	0.00	0.00	0.00	12.63	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Venue - Non-directed Order Flow	Non- Directed Orders (%)	Market Orders (%)	Marketable Limit Orders (%)	Non- Marketable Limit Orders (%)	Other Orders (%)	Net Payment Paid/Received for Market Orders(USD)	Net Payment Paid/ Received for Market Orders(cents per hundred shares)	Net Payment Paid/ Received for Marketable Limit Orders(USD)	Net Payment Paid/ Received for Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/ Received for Non- Marketable Limit Orders(USD)	Net Payment Paid/ Received for Non- Marketable Limit Orders(cents per hundred shares)	Net Payment Paid/Received for Other Orders(USD)	Net Payment Paid/ Received for Other Orders(cents per hundred shares)
ODEON CAPITAL GROUP LLC (ODNC)	5.21	0.00	0.00	0.00	5.21	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Material Aspects:

TRADEMAS INC. (WALL):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provided occording to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (ii) not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any rebates or similar payments that Odeon may receive.

DASH FINIANCIAL TECHNOLOGIES LLC (DFIN):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provides Odeon with a rebate or similar payments: (i) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (iii) making order routing determinations wholly independently from any receive.

Wall Street Access (WABR):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provided odeon with a rebate or similar payments; (ii) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (ii) not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any receive.

ODEON CAPITAL GROUP LLC (ODNC):

Odeon Capital Group (Odeon) does not accept payment for order flow from other broker-dealers. Odeon may receive payment from venues in the form of pass-through rebates from certain exchanges. These payments generally offset fees for accessing orders or for other services provided by exchanges. From time to time, the amount of rebates Odeon receives as a pass-through from an exchange may exceed the amount of fees that is charged by such exchange. Odeon does not base equities or options order routing decisions on the receipt of payment for order flow or any other order routing inducements. To the extent that any exchange provided odeon with a rebate or similar payments: (i) are provided according to exchange fee schedules and rules approved by the SEC; (ii) are not actively solicited or sought after by Odeon; (iii) if received, are de minimus; and (iv) do not influence Odeon's order routing practices, which are determined by Odeon's duty of best execution. Odeon effectively manages this potential conflict of interest by (i) providing customer disclosures regarding its payment for order flow practices; (ii) not seeking out or negotiating payments for order flow; and (iii) making order routing determinations wholly independently from any receive.