

### Virtu Americas LLC Rule 606 Disclosure: Q3 2018

Virtu Americas LLC ("VAL" or "the Firm") has prepared this report for itself pursuant to a U.S. Securities and Exchange Commission rule requiring all brokerage firms to make available to the public quarterly reports about their order routing practices.

This report provides information on the routing of "non-directed orders" – any order that the customer has not specifically instructed to be routed to a particular venue for execution – by VAL's algorithmic trading and routing business, which utilizes the MPIDs "DTTX", "GFLO" and "VALR", and VAL's institutional sales trading business, which utilizes the MPID "NITE".

Pursuant to SEC guidance, VAL identifies itself as the execution venue on riskless principal executions; VAL acts as a market center in equity securities listed on the NYSE, NASDAQ, NYSE American and regional exchanges. VAL has provided individual line items when it has acted in a principal and a riskless principal capacity.

VAL also makes markets on several options exchanges in a limited number of appointments.

Clients can request specific information regarding the handling of their orders from the VAL Compliance Department.

#### **Disclosures and Material Relationships:**

VAL operates Virtu MatchIt, an alternative trading system, and VAL's market making division operates VEQ-Link, a single dealer platform. VAL is a market maker in OTC equity securities, listed equities and options on the following exchange complexes venues: New York Stock Exchange ("NYSE"), The NASDAQ Stock Market LLC ("NASDAQ") and Cboe Global Markets ("CBOE").

VAL has two broker dealer affiliates that conduct business in NMS equity securities, Virtu Financial BD LLC ("VFBD") and Virtu Financial Capital Markets, LLC ("VFCM"). VFBD and VFCM act as equity market makers in NMS securities. VFBD operates VEQ, a single dealer platform and makes markets in options on the Cboe BZX Options Exchange. In some instances VAL routes customer orders to VFCM for onward routing to market centers for execution. For the purposes of its Rule 606 calculations VAL has identified the ultimate market center rather than VFCM.

VAL routes orders to market centers, including national securities exchanges, alternative trading systems, electronic communications networks, and broker-dealers that may offer credits for orders that provide liquidity to (remove liquidity from) their books and assess fees for orders that take liquidity from (add liquidity to) their books. In some cases, the credits offered by a market center may exceed the charges



assessed, such that a market center may make a payment to VAL in relation to orders directed to such market center.

"Other Orders" include market opening and closing orders, orders submitted with stop prices, all- ornone orders and Not Held orders. Algorithmic and Smart Order Routing orders are considered Not Held. Algorithmic and Smart Order Routing orders access VAL's market making unit for stop orders and orders in OTCBB/Pink Sheet securities.

The report is divided into five sections:

- 1. New York Stock Exchange listed securities
- 2. Nasdaq Stock Exchange listed securities
- 3. NYSE MKT and other Exchange listed securities
- 4. OTC Equity Securities

For each section, this report identifies the top venues to which VAL routed orders, setting forth the percentage for each venue. For equity securities, this report also provides information concerning the aggregate fees paid to and rebates received from each venue by VAL. Fees and rebates that were passed through to VAL's clients are not included. In prior reports, data for listed options was also provided; however, in Q2 2018 the Firm did not handle customer orders in listed options.

Questions regarding this report should be addressed to:

Virtu Americas LLC Compliance Department 300 Vesey St New York, NY 10282

#### 1. New York Stock Exchange Securities

99.15% of orders for New York Stock Exchange listed securities were non-directed, of which 0.6% were Market Orders, 0.35% were Limit Orders, and 99.06% were Other Orders

|                                | % Non-<br>Directed<br>Orders | %<br>Market<br>Orders | %<br>Limit<br>Orders | % Other<br>Orders | Fees Paid \$ | Rebates<br>Received \$ |
|--------------------------------|------------------------------|-----------------------|----------------------|-------------------|--------------|------------------------|
| New York Stock Exchange        | 23.60                        | 0                     | 0                    | 24.18             | 2,080,448    | 111,750                |
| NASDAQ Execution Services, LLC | 7.07                         | 0                     | 0                    | 7.24              | 912,405      | 111,630                |
| UBS Securities LLC             | 7.05                         | 0                     | 0                    | 7.22              | 165,591      | 0                      |



| NYSE Arca (ARCX)                               | 6.20 | 0     | 0     | 6.35 | 617,710 | 30,228  |
|--|------|-------|-------|------|---------|---------|
| EDGX Exchange, Inc. (EDGX)                     | 5.95 | 0     | 0     | 6.09 | 751,593 | 123,392 |
| BATS Exchange, Inc. (BYX)                      | 5.93 | 0     | 0     | 6.07 | 14,712  | 191,665 |
| Virtu Principal                                | 5.66 | 30.55 | 27.92 | 5.06 | 0       | 0       |
| Bats Trading, Inc.                             | 4.97 | 0     | 0     | 5.10 | 984,886 | 43,021  |
| IEX Services LLC                               | 4.73 | 0     | 0     | 4.84 | 143,353 | 0       |
| NASDAQ Execution LLC (NQBX)                    | 4.34 | 0     | 0     | 4.44 | 13,159  | 132,155 |
| Virtu MatchIt                                  | 2.90 | 0     | 0     | 2.98 | 0       | 0       |
| Credit Suisse Securities (USA) LLC             | 2.40 | 0     | 0     | 2.45 | 53,141  | 0       |
| Goldman Sachs Execution & Clearing L.P. (SGMA) | 2.06 | 0     | 0     | 2.11 | 70,849  | 0       |
| JP Morgan Securities LLC                       | 1.97 | 0     | 0     | 2.03 | 83,585  | 0       |
| Deutsche Bank Securities Inc.                  | 1.93 | 0     | 0     | 1.98 | 48,556  | 0       |
| Virtu Riskless                                 | 1.69 | 69.45 | 72.07 | .02  | 0       | 0       |
| EBX LLC  | 1.51 | 0     | 0     | 1.55 | 24,104  | 0       |
| EDGA Exchange, Inc. (EDGA)                     | 1.49 | 0     | 0     | 1.52 | 16,578  | 19,305  |

## 2. NASDAQ Stock Exchange Securities

98.52% of orders for NASDAQ Stock Exchange listed securities were non-directed, of which 0.42% were Market Orders, 0.88% were Limit Orders, and 98.70% were Other Orders

|                                    | % Non-<br>Directed<br>Orders | %<br>Market<br>Orders | %<br>Limit<br>Orders | % Other<br>Orders | Fees Paid \$ | Rebates<br>Received \$ |
|------------------------------------|------------------------------|-----------------------|----------------------|-------------------|--------------|------------------------|
| NASDAQ Execution Services, LLC     | 23.85                        | 0                     | 0                    | 24.27             | 1,985,440    | 154,653                |
| EDGX Exchange, Inc. (EDGX)         | 11.83                        | 0                     | 0                    | 12.03             | 1,112,005    | 93,524                 |
| NYSE Arca (ARCX)                   | 11.35                        | 0                     | 0                    | 11.54             | 677,600      | 25,035                 |
| UBS Securities LLC                 | 6.50                         | 0                     | 0                    | 6.61              | 116,965      | 0                      |
| Virtu Principal                    | 5.33                         | 32.54                 | 17.77                | 5.01              | 0            | 0                      |
| Bats Trading, Inc.                 | 4.80                         | 0                     | 0                    | 4.88              | 673,763      | 25,820                 |
| BATS Exchange, Inc. (BYX)          | 4.30                         | 0                     | 0                    | 4.38              | 7,272        | 140,051                |
| IEX Services LLC                   | 3.57                         | 0                     | 0                    | 3.62              | 110,112      | 0                      |
| NASDAQ Execution LLC (NQBX)        | 3.48                         | 0                     | 0                    | 3.54              | 11,074       | 114,239                |
| Virtu MatchIt                      | 2.87                         | 0                     | 0                    | 2.93              | 0            | 0                      |
| New York Stock Exchange            | 2.17                         | 0                     | 0                    | 2.21              | 167,693      | 24,504                 |
| Credit Suisse Securities (USA) LLC | 1.99                         | 0                     | 0                    | 2.02              | 32,376       | 0                      |



| Goldman Sachs Execution & Clearing L.P. (SGMA) | 1.96 | 0     | 0     | 2.01 | 61,253 | 0 |
|--|------|-------|-------|------|--------|---|
| JP Morgan Securities LLC                       | 1.74 | 0     | 0     | 1.78 | 58,171 | 0 |
| Deutsche Bank Securities Inc.                  | 1.70 | 0     | 0     | 1.73 | 35,889 | 0 |
| EBX LLC  | 1.57 | 0     | 0     | 1.60 | 18,734 | 0 |
| Virtu Riskless                                 | 1.31 | 67.46 | 82.23 | .01  | 0      | 0 |

## 3. NYSE MKT and Regional Listed Securities

98.51% of orders for NYSE MKT and Regional listed securities were non-directed, of which 0.05% were Market Orders, 0.21% were Limit Orders, and 99.74% were Other Orders

|  | % Non-<br>Directed<br>Orders | Market<br>Orders | % Limit<br>Orders | % Other<br>Orders | Fees Paid \$ | Rebates<br>Received \$ |
|--|------------------------------|------------------|-------------------|-------------------|--------------|------------------------|
| NYSE Arca (ARCX)                               | 18.43                        | 0                | 0                 | 19.05             | 223,834      | 34,292                 |
| EDGX Exchange, Inc. (EDGX)                     | 11.09                        | 0                | 0                 | 11.47             | 271,639      | 11,154                 |
| Virtu Principal                                | 9.14                         | 27.94            | 9.37              | 9.00              | 0            | 0                      |
| NASDAQ Execution Services, LLC                 | 7.74                         | 0                | 0                 | 8.02              | 169,592      | 12,446                 |
| NYSE AMEX                                      | 6.67                         | 0                | 0                 | 6.89              | 58,528       | 0                      |
| BATS Exchange, Inc. (BYX)                      | 5.70                         | 0                | 0                 | 5.89              | 2,144        | 35,323                 |
| UBS Securities LLC                             | 5.32                         | 0                | 0                 | 5.50              | 24,092       | 0                      |
| Bats Trading, Inc.                             | 5.20                         | 0                | 0                 | 5.36              | 114,313      | 11,519                 |
| NASDAQ Execution LLC (NQBX)                    | 2.96                         | 0                | 0                 | 3.06              | 2,546        | 9,888                  |
| Virtu Riskless                                 | 2.82                         | 72.06            | 90.63             | .06               | 0            | 0                      |
| IEX Services LLC                               | 2.81                         | 0                | 0                 | 2.89              | 23,038       | 0                      |
| NYSE Arca PSX                                  | 2.22                         | 0                | 0                 | 2.29              | 22,347       | 0                      |
| Credit Suisse Securities (USA)                 | 2.07                         | 0                | 0                 | 2.15              | 5,199        | 0                      |
| EDGA Exchange, Inc. (EDGA)                     | 2.02                         | 0                | 0                 | 2.07              | 1,010        | 3,270                  |
| Virtu MatchIt                                  | 1.94                         | 0                | 0                 | 2.01              | 0            | 0                      |
| New York Stock Exchange                        | 1.76                         | 0                | 0                 | 1.83              | 21,190       | 5,191                  |
| Goldman Sachs Execution & Clearing L.P. (SGMA) | 1.67                         | 0                | 0                 | 1.74              | 10,434       | 0                      |
| EBX LLC  | 1.39                         | 0                | 0                 | 1.43              | 2,030        | 0                      |



# **4. OTC Equity Securities** 77.24% of orders for OTC Equity Securities were non-directed.

|                 | % Non-<br>Directed<br>Orders | Market<br>Orders | % Limit<br>Orders | % Other<br>Orders | Fees Paid | Rebates<br>Received |
|-----------------|------------------------------|------------------|-------------------|-------------------|-----------|---------------------|
| Virtu Principal | 99.95                        | 0                | 0                 | 99.95             | 0         | 0                   |