Title: Wrinkle Brain is spitting fire on RH's PFOF model

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Something we don't talk about much is how RH's PFOF model is DOUBLY corrupt. By calculating PFOF based on spread, they are not just incentivized to get their clients to trade more - they also want them trading higher spread, less liquid names. It's a disgusting business model.

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and others. Market maker firms a ealers at publicly quoted prices. 131 nore than they purchased them. N OWED ROBINHOOD FOR GME THE WEEK OF -dealers rebates for customer ord nt for order flow (PFOF). 132 T hat market makers play in retail

While virtually all commission-free retail trades are routed through market r bood's relationship with its market makers leading up to January 28, 2021, was disti I ways. One way Robinhood stands out is the number of trades that its customers make portionately high order flow and I ways. One way Robinhood stands out is the number of trades that its customers make ustomers to trade as much as possible. To this end, the company popularized commi ined several market makers an ading to reduce barriers to entry for the stock market. Furthermore, the companion cally had a lax policy for allowing young traders to trade on margin (buying stocks) red money) and famously employs digital engagement tactics, such as celebr tions and game-like features, to increase customer activity on its platform.

In the first quarter of 2020, Robinhood users "traded nine times as many sha ADE customers, and 40 times as many shares as Charles Schwab customers, per dol rrage customer account. "134 Despite several major broker-dealers, such as Charles Sc *TRADE, eliminating trading commissions in recent years, Robinhood still gene g, which Robinhood popularized, cantly more total orders relative to others in the industry leading up to the Meme



CITADEL SECURITIES EMPLOYEES JANUARY 28, 2021 WERE APPROXIMATELY **60 TIMES GREATER THAN THE WEEK** BEFORE. AN EMPLOYEE FOR CITADEL DESCRIBED ROBINHOOD'S PFOF REBATES AS A RUNAWAY FREIGHT TRAIN IN THE DAYS LEADING UP TO JANUARY 28, 2021.

security at the time of executing a trade on behalf of a custor 139 During periods of volatility, such as during the Mem-Market Robinbood's fo rates. Citadel Securities emestimated that the PFOF re owed Robinhood for GME the owek of January 28, 2021, were approximately 60 times greater than the week before. The employee for Citadel Securities described Robinhood's PFOF rebates as a runaway freight to

