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KEY DATA POINTS INSIDE

Daily Short Volume

Naked Short Volume

Market Maker Friction

#### RECENT LODE NEWS

GlobeNewswire•4 days ago

Comstock Mining Announces Google's Parent Investment In Northern Nevada In Immediate Vicinity of Comstock's Certified Industrial Site VIRGINIA CITY, Nev., April 18, 2017-- Comstock Mining Inc. announced today, and the Wall Street Journal reported recently, that Google purchased 1,210 acres for \$29.1 million at the Tahoe Reno Industrial ...

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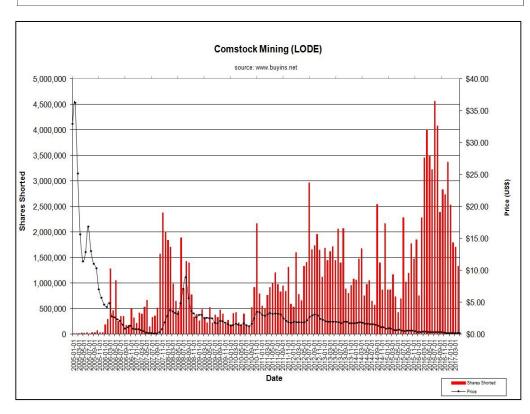
Comstock Mining Announces Sweeping Master Plan and Zone Changes in Silver Springs Nevada VIRGINIA CITY, Nev., April 10, 2017-- Comstock Mining Inc. announced today, that the Lyon County Board of Commissioners unanimously approved both a major, expansion-friendly master plan amendment for the ...

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Comstock Mining Announces 2017 Annual Meeting and Record Date VIRGINIA CITY, Nev., April 04, 2017-- Comstock Mining Inc.

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# LODE SHORT SELLERS



Starting in early 2006 short sellers have aggressively shorted LODE. Shorts have continued this activity which warrants further investigation. Buyins.net will report the results of its surveillance on a monthly basis.

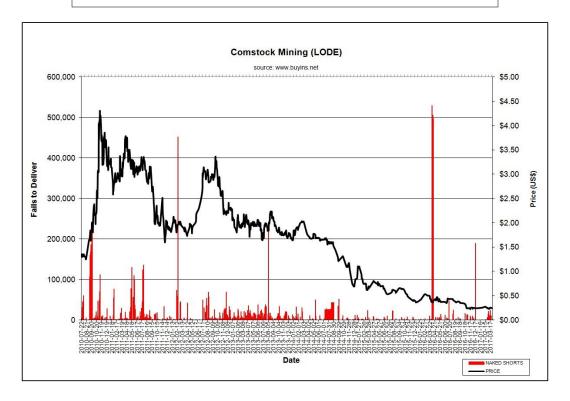
# OVERVIEW OF LODE SHORT SALE DATA

After careful analysis of LODE short sale, naked short sale and market maker friction factor data it is clear that LODE has had issues with short sellers who have been especially aggressive since early 2008. Short sellers have been building a sizable

position in shares of LODE as a percentage of total trading volume and market makers have made a bearish market lately. New evidence of daily short sellers shorting shares of LODE has now come to light as the SEC has finally

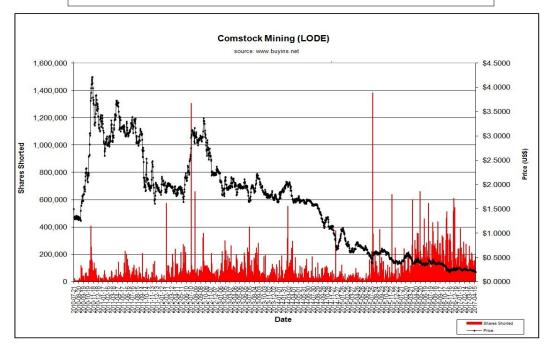
given Buyins.net access to DAILY short sale data which is updated every night. Protecting LODE from abusive shorting is a high priority.

#### DAILY FAILURE TO DELIVER DATA (NAKED SHORTS) IN LODE



Failures to Deliver in LODE have occurred as short sellers have been lax at complying with Regulation SHO since mid 2010. Buyins.net will continue to monitor and report short sellers for non-compliance with Regulation SHO borrow requirements.

#### **NEW DAILY SHORT SALE TRADING VOLUME STARTING 7-21-10**



Shorts have been shorting LODE on a daily basis. An average of 36.86% of daily trading volume is short selling. This is higher than what is considered normal.

Date	ShortVolume	e TotalVolume	Percent	SqueezeTrigger	<b>\$Value</b>
4/21/2017	106,498	258,500	41.20%	\$0.2008	\$21,406
4/20/2017	184,067	515,287	35.72%	\$0.2014	\$36,997
4/19/2017	68,178	200,023	34.09%	\$0.2030	\$13,840
4/18/2017	71,392	153,849	46.40%	\$0.2082	\$14,850
4/17/2017	155,368	283,582	54.79%	\$0.2129	\$33,093
4/13/2017	154,654	365,877	42.27%	\$0.2188	\$33,869
4/12/2017	97,290	163,180	59.62%	\$0.2295	\$22,377
4/11/2017	101,110	264,636	38.21%	\$0.2324	\$23,458
4/10/2017	119,714	317,560	37.70%	\$0.2177	\$26,098
4/7/2017	82,490	206,490	39.95%	\$0.2131	\$17,570
4/6/2017	109,295	175,675	62.21%	\$0.2162	\$23,608
4/5/2017	153,425	363,552	42.20%	\$0.2163	\$33,140
4/4/2017	87,561	177,595	49.30%	\$0.2226	\$19,526
4/3/2017	86,509	175,950	49.17%	\$0.2294	\$19,897
3/31/2017	57,866	159,137	36.36%	\$0.2231	\$12,731
3/30/2017	196,581	477,085	41.20%	\$0.2298	\$45,214
3/29/2017	63,858	144,985	44.04%	\$0.2328	\$14,879
3/28/2017	64,031	173,034	37.00%	\$0.2324	\$14,855
3/27/2017	211,370	463,398	45.61%	\$0.2370	\$50,095
3/24/2017	17,442	66,331	26.30%	\$0.2442	\$4,256
3/23/2017	39,274	92,050	42.67%	\$0.2455	\$9,661
3/22/2017	8,489	57,702	14.71%	\$0.2442	\$2,071
3/21/2017	157,931	222,280	71.05%	\$0.2504	\$39,483
3/20/2017	87,044	165,167	52.70%	\$0.2498	\$21,761
3/17/2017	168,361	241,705	69.66%	\$0.2488	\$41,922
3/16/2017	52,871	113,736	46.49%	\$0.2464	\$13,006
3/15/2017	143,339	253,737	56.49%	\$0.2466	\$35,405
3/14/2017	15,141	66,817	22.66%	\$0.2401	\$3,634
3/13/2017	260,609	458,239	56.87%	\$0.2425	\$63,328
3/10/2017	56,738	110,497	51.35%	\$0.2345	\$13,333
3/9/2017	137,580	441,740	31.15%	\$0.2329	\$32,056
3/8/2017	88,538	124,132	71.33%	\$0.2333	\$20,629
3/7/2017	88,459	162,312	54.50%	\$0.2313	\$20,434
3/6/2017	74,875	161,114	46.47%	\$0.2356	\$17,671
3/3/2017	117,045	174,830	66.95%	\$0.2326	\$27,271
Total	123,748,982	335,769,896	36.86%	\$1.3473	\$166,726,722

<sup>\*</sup>Total includes data back to 7-21-10. Chart truncated for viewing.

### MARKET MAKER SURVEILLANCE SYSTEM (FRICTION FACTOR)

Date	Change	BuyVol	SellVol	NetVol	Friction
4/21/2017	\$0.00	85,069	111,339	-26,270	<b>Bullish Bias</b>
4/20/2017	\$0.00	142,265	162,990	-20,725	Bullish Bias
4/19/2017	\$0.00	48,776	64,485	-15,709	Bullish Bias
4/18/2017	-\$0.01	75,259	55,023	20,236	Bearish Bias
4/17/2017	-\$0.01	53,277	146,134	-92,857	-92,857
4/13/2017	-\$0.01	152,549	76,181	76,368	Bearish Bias
4/12/2017	\$0.00	71,533	68,138	3,395	Bearish Bias
4/11/2017	\$0.01	90,812	132,035	-41,223	<b>Bullish Bias</b>
4/10/2017	\$0.01	94,589	126,625	-32,036	Bullish Bias
4/7/2017	-\$0.01	54,269	85,706	-31,437	-31,437
4/6/2017	\$0.00	121,954	42,840	79,114	Bearish Bias
4/5/2017	-\$0.01	126,358	133,955	-7,597	-7,597
4/4/2017	-\$0.01	92,917	45,983	46,934	Bearish Bias
4/3/2017	\$0.00	35,655	31,180	4,475	Bearish Bias
3/31/2017	-\$0.01	49,267	76,615	-27,348	-27,348
3/30/2017	\$0.00	101,646	283,551	-181,905	Bullish Bias
3/29/2017	\$0.00	69,987	46,280	23,707	Bearish Bias
3/28/2017	\$0.00	46,756	98,820	-52,064	Bullish Bias
3/27/2017	-\$0.01	241,529	148,661	92,868	Bearish Bias
3/24/2017	\$0.00	11,409	51,815	-40,406	Bullish Bias
3/23/2017	\$0.01	42,409	43,438	-1,029	Bullish Bias
3/22/2017	-\$0.01	7,967	45,804	-37,837	-37,837
3/21/2017	\$0.00	132,925	44,295	88,630	Bearish Bias
3/20/2017	\$0.01	52,028	60,139	-8,111	<b>Bullish Bias</b>
3/17/2017	\$0.00	140,594	54,742	85,852	Bearish Bias
3/16/2017	\$0.00	17,869	62,000	-44,131	Bullish Bias
3/15/2017	\$0.00	111,255	71,187	40,068	Bearish Bias
3/14/2017	\$0.00	16,900	17,560	-660	Bullish Bias
3/13/2017	\$0.01	306,041	70,205	235,836	235,836
3/10/2017	\$0.00	27,647	46,191	-18,544	Bullish Bias
3/9/2017	-\$0.01	154,477	212,859	-58,382	-58,382
3/8/2017	\$0.01	54,137	42,743	11,394	11,394
3/7/2017	\$0.00	37,189	69,920	-32,731	Bullish Bias
3/6/2017	\$0.00	81,674	47,729	33,945	Bearish Bias
3/3/2017	\$0.00	76,548	44,301	32,247	Bearish Bias
3/2/2017	-\$0.01	58,153	74,060	-15,907	-15,907
3/1/2017	\$0.00	29,475	65,154	-35,679	Bullish Bias
2/28/2017	-\$0.01	33.097	63.952	-30.855	-30.855

The above data is used to calculate if a fair market is being made in the shares of LODE. 45% of recent trading days are positive or bullishly biased and 55% of trading days are negative or bearishly biased. There is a bearish market being made in LODE in the past 38 trading days.

Friction Factor determines if there is normal or abnormal behavior in the price action of the stock when compared to the buying vs. selling trading statistics. It calculates number of net shares of buying or selling to move price +/- one cent.

#### Here is how to understand Friction Factor:

- 1. If Friction Factor is positive, more buying than selling caused LODE's price to rise
- 2. If Friction Factor is negative, more selling than buying caused LODE's price to fall
- 3. If Friction Factor is 0, there was no discernable activity either way
- 4. If Friction Factor is abnormal, it means that there is either a bearish bias or a bullish bias to how market makers are making market in your stock.

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# Trading Solutions to Naked Short Selling

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#### BUYINS.NET WILL ISSUE A VARIETY OF REPORTS ON LODE

#### **REGULATORY & COMPLIANCE NEWS**

- Friction Factor market maker surveillance system tracking Level II market makers in all stocks to determine Price Friction and compliance with new "Fair Market Making Requirements"
- RegSHO Naked Shorts tracks EVERY failure to deliver in all US stocks and tracks all Threshold Security Lists daily for which stocks have naked shorts that are not in compliance with Regulation SHO

#### **INVESTMENTS & TRADING**

- SqueezeTrigger 40 billion cell database tracks EVERY short sale (not just total short interest) in all US stocks and calculates volume weighted price that a short squeeze will begin in each stock
- Earnings Edge predicts probability, price move and length of move before and after all US stock earnings reports
- Seasonality predicts probability, price move and length of move based on exact time of year for all US stocks
- Group Trader tracks sector rotation and stock correlation to its sector and predicts future moves in ALL sectors and industry groups
- Pattern Scan automates tracking of every technical pattern and predicts time and size of move in all stocks
- GATS (Global Automated Trading System) tracks all known trading strategies and qualifies and quantifies which are working best in real time

#### WHY BUYINS.NET IS BEST CHOICE FOR LODE MARKET INTEGRITY

The data we provide is extremely useful for LODE for the following reasons:

- 1. Stop naked short selling in shares of LODE
- 2. Break the market maker hold on Level II box causing so much price friction
- 3. Our SqueezeTrigger Reports that cross newswires and are sent to our 750,000 users help break the rest of the shorts
- 4. Discourage new short sellers from shorting your stock
- 5. Stop the negative perception that dropping stock price places on normal day to day business operations
- 6. Combined all of these facets help to stop the daily drain that the short attacks have on the company.

Here is a quick technology overview:

## http://www.buyins.com/brochure.pdf

Background information on our CEO:

http://www.buyins.com/images/tomronk.pdf