

SECURITIES AND EXCHANGE COMMISSION

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**ANNUAL AUDITED REPORT**  
**FORM X-17A-5/A**  
**PART III**

SEC FILE NUMBER  
8-53382

DIVISION OF MARKET REGULATION

FACING PAGE

**Information Required of Brokers and Dealers Pursuant to Section 17 of the  
Securities Exchange Act of 1934 and Rule 17a-5 Thereunder**

REPORT FOR THE PERIOD BEGINNING \_\_\_\_\_ AND ENDING 12/31/09  
MM/DD/YY MM/DD/YY

**A. REGISTRANT IDENTIFICATION**

NAME OF BROKER-DEALER: Bluefin Trading LLC

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

OFFICIAL USE ONLY  
FIRM I.D. NO.

(No. and Street)

(City)

(State)

(Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

(Area Code - Telephone Number)

**B. ACCOUNTANT IDENTIFICATION**

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report\*

Ryan + Quaska

(Name - if individual, state last, first, middle name)

(Address)

(City)

(State)

(Zip Code)

CHECK ONE:

- Certified Public Accountant
- Public Accountant
- Accountant not resident in United States or any of its possessions.

**FOR OFFICIAL USE ONLY**

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

SEC 1410 (06-02)

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Washington, DC  
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**BLUEFIN TRADING, LLC**

**INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING  
AGREED-UPON PROCEDURES RELATED TO AN  
ENTITY'S SIPC ASSESSMENT RECONCILIATION AND  
SUPPLEMENTARY SCHEDULES  
PURSUANT TO SEC RULE 17a-5(e)(4)**

**Period Ended December 31, 2009**



**RYAN & JURASKA**  
Certified Public Accountants  
141 West Jackson Boulevard  
Chicago, Illinois 60604  
Tel: 312.922.0062  
Fax: 312.922.0672

**INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES  
RELATED TO AN ENTITY'S SIPC ASSESSMENT RECONCILIATION**

To the Member of  
Bluefin Trading, LLC

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying summary of Schedule of Assessment and Payments [Transitional Assessment Reconciliation (Form SIPC-7T)] to the Securities Investor Protection Corporation (SIPC) for the period from April 1, 2009 to December 31, 2009, which were agreed to by Bluefin Trading, LLC (the "Company") and the Securities and Exchange Commission, NYSE Amex and SIPC (the "specified parties"), solely to assist you and the other specified parties in evaluating the Company's compliance with the applicable instructions of the Transitional Assessment Reconciliation (Form SIPC-7T). The Company's management is responsible for the Company's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

1. Compared the listed assessment payments in Form SIPC-7T with respective cash disbursement records entries noting no differences;
2. Compared the amounts reported on the audited Form X-17A-5 for the period April 1, 2009 to December 31, 2009, as applicable, with the amounts reported in Form SIPC-7T for the period April 1, 2009 to December 31, 2009, noting no differences;
3. Compared any adjustments reported in Form SIPC-7T with supporting schedules and working papers noting no differences;
4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7T and in the related schedules and working papers supporting the adjustments noting no differences.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

Chicago, Illinois  
February 24, 2010

**SIPC-7T**

(29-REV 12/09)

SECURITIES INVESTOR PROTECTION CORPORATION

805 15th St. N.W. Suite 800, Washington, D.C. 20005-2215  
202-371-8300

**Summary of  
Transitional Assessment Reconciliation**

**SIPC-7T**

(29-REV 12/09)

(Read carefully the instructions in your Working Copy before completing this Form)

**TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS**

1. Name of Member, address, Designated Examining Authority, 1934 Act registration no. and month in which fiscal year ends for purposes of the audit requirement of SEC Rule 17a-5:

53382 NYSE Amex DEC  
3 Park Avenue, 37th Floor  
New York, NY 10016

Note: If any of the information shown on the mailing label requires correction, please email any corrections to form@sipc.org and so indicate on the form filed.

Name of telephone number of person to contact respecting this form.  
Mike Kole 847-448-1180

- |  |     |                               |
|--|-----|-------------------------------|
| 2. A. General Assessment [item 2e from page 2 (not less than \$150 minimum)]               | \$  | <u>49,831</u>                 |
| B. Less payment made with SIPC-6 filed including \$150 paid with 2009 SIPC-4 (exclude int) | (   | <u>11,804</u> )               |
| <hr/>  |     |                               |
| Date Paid  |     |                               |
| C. Less prior overpayment applied  | (   | <u>-</u> )                    |
| D. Assessment balance due or (overpayment)   |     | <u>38,027</u>                 |
| E. Interest computed on late payment (see instruction E) for _____ days at 20% per annum   |     | <u>                    </u>   |
| F. Total assessment balance and interest due (or overpayment carried forward)              | \$  | <u>38,027</u>                 |
| G. PAID WITH THIS FORM   |     |                               |
| Check enclosed, payable to SIPC  |     |                               |
| Total (must be same as F above)  | \$  | <u>38,027</u>                 |
| H. Overpayment carried forward   | \$( | <u>                    </u> ) |

3. Subsidiaries (S) and predecessors (P) included in this form (give name and 1934 Act registration number):

**SEE ACTUAL FORM SIPC-7T AS PREVIOUSLY FILED  
FOR ORIGINAL SIGNATURE. ACTUAL FORM SIPC-7T  
FILED ON MARCH 1, 2010**

The SIPC member submitting this form and the person by whom it is executed represent thereby that all information contained herein is true, correct and complete.

(Name of Corporation, Partnership or other organization)

(Authorized Signature)

Dated the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

(Title)

This form and the assessment payment is due 60 days after the end of the fiscal year. Retain the Working Copy of this form for a period of not less than 6 years, the latest 2 years in an easily accessible place.

**SIPC REVIEWER**

Dates:	<u>                    </u>	<u>                    </u>	<u>                    </u>
	Postmarked	Received	Reviewed
Calculations	<u>                    </u>	Documentation	<u>                    </u>
Exceptions:			Forward Copy <u>                    </u>
Disposition of exceptions:			

**DETERMINATION OF "SIPC NET OPERATING REVENUES"  
AND GENERAL ASSESSMENT**

Amounts for the fiscal period  
beginning April 1, 2009 and  
ending December 31, 2009

**Eliminate cents**

**Item No.**

2a. Total Revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)		\$	<u>32,096,570</u>
<b>2b. Additions:</b>			
(1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above.			<u>-</u>
(2) Net loss from principal transactions in securities in trading accounts.			<u>-</u>
(3) Net loss from principal transactions in commodities trading accounts.			<u>-</u>
(4) Interest and dividend expense deducted in determining item 2a.			<u>2,003,210</u>
(5) Net loss from management of or participation in the underwriting or distribution of securities.			<u>-</u>
(6) Expenses other than advertising, printing, registration fees, and legal fees deducted in determining net profit from management of or participation in underwriting or distribution of securities.			<u>-</u>
(7) Net loss from securities within investment accounts			<u>-</u>
Total additions			<u>34,099,780</u>
<b>2c. Deductions:</b>			
(1) Revenues from the distribution of shares of a registered open end investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security futures products.			<u>-</u>
(2) Revenues from commodity transactions.			<u>5,431,681</u>
(3) Commissions, floor brokerage, and clearance paid to other SIPC members in connection with securities transactions.			<u>8,458,799</u>
(4) Reimbursements for postage in connection with proxy solicitation.			<u>-</u>
(5) Net gain from securities in investment accounts.			<u>-</u>
(6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) treasury bills, banker acceptances or commercial paper that matures in nine months or less from issuance date.			<u>-</u>
(7) Direct expenses of printing, advertising, and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act).			<u>-</u>
(8) Other revenue not related either directly or indirectly to the securities business. (See instruction C)			<u>277,000</u>
<hr/>			
(9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA Line CODE 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	\$		<u>-</u>
(ii) 40% of interest earned on customer securities accounts.	\$		<u>-</u>
Enter the greater of line (i) or (ii)			<u>-</u>
Total deductions			<u>14,167,480</u>
2d. SIPC Net Operating Revenues		\$	<u>19,932,300</u>
2e. General Assessment @ .0025		\$	<u>49,831</u>

(to page 1 but not less than  
\$150 minimum)