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7/28



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

SEC FILE NUMBER  
8- 46412

**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 01/01/2009 AND ENDING 12/31/2009  
MM/DD/YY MM/DD/YY

**A. REGISTRANT IDENTIFICATION**

NAME OF BROKER-DEALER:  
Asia Pacific Financial Management Group, Inc.  
ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)  
145 Aspinall Avenue

OFFICIAL USE ONLY  
FIRM I.D. NO.

(No. and Street)  
Hagatna Guam 96910-5156  
(City) (State) (Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT  
Sandra McKeever (671) 472-6400  
(Area Code - Telephone Number)

**B. ACCOUNTANT IDENTIFICATION**

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

Burger & Comer, P.C.

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

278 S Marine Corps Dr. Ste 104 Tamuning Guam 96913  
(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)

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OATH OR AFFIRMATION

I, Sandra McKeever, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of Asia Pacific Financial Management Group, Inc., as of December 31, 2009, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:

**THERESE BENAVENTE PENAFLOR**  
**NOTARY PUBLIC**  
In and for Guam, U.S.A.  
My Commission Expires: Mar. 05, 2011  
145 Aspinall Ave. Hagatna, Guam 96910

*Theresa Benavente Penaflor*  
Notary Public

*Sandra McKeever*  
Signature

Vice President  
Title

This report \*\* contains (check all applicable boxes):

- (a) Facing Page.
- (b) Statement of Financial Condition.
- (c) Statement of Income (Loss).
- (d) Statement of Changes in Financial Condition.
- (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
- (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors.
- (g) Computation of Net Capital.
- (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
- (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- (l) An Oath or Affirmation.
- (m) A copy of the SIPC Supplemental Report.
- (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

\*\* For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

**ASIA PACIFIC FINANCIAL MANAGEMENT GROUP, INC.**  
**(a Guam corporation)**

Computation of Net Capital Under Rule 15c3-1  
of the Securities and Exchange Commission

December 31, 2009

NET CAPITAL:

Total stockholders' equity qualified for net capital	\$ 210,374
Deductions:	
Non-allowable assets:	
Clearing accounts	(47,910)
Broker and other receivables	(50,001)
Prepaid insurance	(5,535)
Furniture, equipment and leasehold improvements	(7,594)
Haircuts on securities from Part IIA	<u>(3,235)</u>
Net capital	\$ <u>96,099</u>

**ASIA PACIFIC FINANCIAL MANAGEMENT GROUP, INC.**  
**(a Guam corporation)**

Computation of Net Capital

Reconciliation with Focus Report Form X-17A-5

December 31, 2009

	<u>Per Audit</u>	<u>Per Forms Report</u>	<u>Difference</u>
Total ownership equity qualified for net capital	\$ <u>96,099</u>	<u>96,099</u>	<u>-</u>

Reconciliation with company's computation (included in Part IIA of Form X-17-A-5 as of December 31, 2009) noted no difference between the original FOCUS report and the audit.

**ASIA PACIFIC FINANCIAL MANAGEMENT GROUP, INC.**  
**(a Guam Corporation)**

Schedule II

Determination of Reserve Requirements  
Under Rule 15c3-3 of the Securities and Exchange Commission  
December 31, 2009

The Company is exempt from the Reserve Requirement of computation according to the provision of Rule 15c3-3(k)(2)(ii).