10032383	UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549 ANNUAL AUDITED REPORT FORM X-17A-5/A PART III	OMB APPROVAL OMB Number: 3235-0123 Expires: February 28, 2010 Estimated average burden hours per response12.00 SEC FILE NUMBER 8- 50337
	FACING PAGE n Required of Brokers and Dealers Pursuant to nrities Exchange Act of 1934 and Rule 17a-5 Th	
REPORT FOR THE PERIOD	BEGINNING 07/01/09 AND ENDI	NG 06/30/10 MM/DD/YY
-	A. REGISTRANT IDENTIFICATION	
	ER: Commonfund Securities, Inc. PLACE OF BUSINESS: (Do not use P.O. Box No.) Danb JCJ Diagd	OFFICIAL USE ONLY
Wilton (City)	(No. and Street) CT (State)	06897 (Zip Code)
NAME AND TELEPHONEN	NUMBER OF PERSON TO CONTACT IN REGARD TO T 203-563-5085 B. ACCOUNTANT IDENTIFICATION	HIS REPORT (Area Code – Telephone Number)
<u>Pricewaterha</u> <u>300 Madis</u> (Address)	CCOUNTANT whose opinion is contained in this Report* OUSE Coopers, LLP (Name - if individual, state last, first, middle name) MAVENCE, NY (City)	(State) (Zip Code)
CHECK ONE:	tant t resident in United States or any of its possessions.	SECURITIES AND EXCHANGE COMMISSION RECEIVED SEP 2 7 2010
	FOR OFFICIAL USE ONLY	BRANCH OF REGISTRATIONS AND 04 EXAMINATIONS

\*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)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

SEC 1410 (06-02)

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PW

#### OATH OR AFFIRMATION

I, , swear (or affirm) that, to the best of my kpowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of ties INC. Mos nd \_\_\_, as 2010, are true and correct. I further swear (or affirm) that NP 2 of 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: ELEANOR F. ROYSTON NOTARY PUBLIC OMMISSION EXPIRES SEP. 30, 2011 YDI Title Elcanor This report **\*\*** contains (check all applicable boxes): 🛛 (a) Facing Page. (b) Statement of Financial Condition.  $\Box$  (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. (i) 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. X (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).

# PRICEWATERHOUSE COPERS 🛽

PricewaterhouseCoopers LLP 300 Madison Avenue New York NY 10017 Telephone (646) 471-3000 pwc.com

#### **Report of Independent Accountants**

To The Common Fund for Non Profit Organizations

In accordance with Rule 17a-5(e)(4) of the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying General Assessment Reconciliation (Form SIPC-7) of the Securities Investor Protection Corporation (SIPC) of Commonfund Securities Inc. for the year ended June 30, 2010, which were agreed to by The Common Fund for Non Profit Organizations, the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and the Securities Investor Protection Corporation (collectively, the "specified parties") solely to assist the specified parties in evaluating Commonfund Securities Inc.'s compliance with the applicable instructions of Form SIPC-7 during the year ended June 30, 2010. Management is responsible for Commonfund Securities Inc.'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:

- Compared the listed assessment payments on page 1, items 2B and 2F of Form SIPC-7 with the respective cash disbursement records entries, as follows: Payment dated January 22, 2010 in the amount of \$150 compared to the February 2010 Wachovia Bank N.A. statement provided by Ann Chu, Controller, The Common Fund for Non Profit Organizations noting no differences.
- Compared the sum of Total Revenue amount reported on page 5, line 7 of the quarterly Form X-17A-5 for the periods in the year ended June 30, 2010 with the Total revenue amount of \$22,706,577 reported on page 2, item 2a of Form SIPC-7 for the year ended June 30, 2010 noting no differences.
- 3. Compared any adjustments reported on page 2, items 2b and 2c of Form SIPC-7 with the supporting schedules and working papers, as follows:
  - a. Compared additions on line 7, Net loss from securities in investment accounts of \$1,059 to the Monthly Mark to Market Schedule provided by Ann Chu, Controller, The Common Fund for Non Profit Organizations noting no differences.
  - b. Compared deductions on line 8, Other revenue not related either directly or indirectly to the securities business of \$22,166,910 to the Transfer Pricing Calculation provided by Ann Chu, Controller, The Common Fund for Non Profit Organizations noting no differences.
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers obtained in procedure 3, as follows:

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- a. Recalculated the mathematical accuracy of the SIPC Net Operating Revenues on page 2, line 2d and the General Assessment @ .0025 on page 2, line 2e of \$540,726 and \$1,352, respectively of the Form SIPC-7 noting no differences.
- 5. Recalculated the unrealized gain on investments as share times market value on June 30, 2010 less shares times market value on June 30, 2009.
- 6. Recalculated the transfer pricing allocation as Total Expenses of \$19,744,849 per the Financial Statements times 115% less Other Income of \$539,667 per the Financial Statements.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the Company's preparation of Form SIPC-7 in accordance with the applicable instructions. 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 management and the board of directors of Commonfund Securities Inc., the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and the Securities Investor Protection Corporation and is not intended to be and should not be used by anyone other than these specified parties.

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PricewaterhouseCoopers LLP August 26, 2010

SIPC-7 (32-REV 6/10)	P.O. Box 92 General	STOR PROTECTION CORPO 185 Washington, D.C. 20090-2185 202-371-8300 Assessment Reconciliation	SIPC-7 (32-REV 6/10)
	For the fiscal	year ended JUNE 30 , 201	
•		ons in your Working Copy before completi	
·		IPC MEMBERS WITH FISCAL YEA	
purposes of the audit r	equirement of SEC Rule 17a-5:	uthomy, 1934 Act registration no. an	d month in which fiscal year ends for
050337 FINF COMMONFUN 15 OLD DANB PO BOX 812	D SECURITIES INC	requires correction, pleas form@sipc.org and so ind	
WILTON CT OF	6897-0812	Name and telephone num respecting this form.	ber of person to contact
•		l l	
		KEVIN J. Pou	SER (203)563-5148
2. A. `General Assess	ment [item 2e from page 2 (not	less than \$150 minimum)]	\$ 1,351,82
B. Less payment ma	ade with SIPC-6 filed (exclude int	erest)	()
Date P	aid		<u>.</u>
C. Less prior over	payment applied		()
D. Assessment bal	ance due or (overpayment)		1,201.82
E. Interest comput	ed on late payment (see instruc	tion E) fordays at 20% per an	
F. Total assessme	nt balance and interest due (or	overpayment carried forward)	\$ 1,201.82
	S FORM: , payable to SIPC same as F above)	s 1,201.82	,
H. Overpayment ca	arried forward	\$(	)
3. Subsidiaries (S) and	l predecessors (P) included in t	his form (give name and 1934 Act re	gistration number):
person by whom it is e	mitting this form and the xecuted represent thereby ntained herein is true, correct	COMMONFUND SE	icupities, FNL.
Dated the <b>26</b> day o	f Duloust, 2010.	Treasurer	(Authorized Signature) (Title)
This form and the ass for a period of not le	sessment payment is due 60 d ss than 6 years, the latest 2 y	ays after the end of the fiscal year ears in an easily accessible place.	. Retain the Working Copy of this form
Dates: Postmar Calculations Exceptions: <sup>*</sup>	ked Received	Reviewed	
Calculations	ن	Documentation	Forward Copy
	<del></del>		
Exceptions:			
Disposition of exc	eptions:	1	

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

Item No.

2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)

2b. Additions:

- (1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above.
- (2) Net loss from principal transactions in securities in trading accounts.
- (3) Net loss from principal transactions in commodities in trading accounts.
- (4) Interest and dividend expense deducted in determining item 2a.
- (5) Net loss from management of or participation in the underwriting or distribution of securities.
- (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.
- (7) Net loss from securities in investment accounts.
  - Es 🖕
  - Total additions

2c. Deductions:

- (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.
- (2) Revenues from commodity transactions.
- (3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.
- (4) Reimbursements for postage in connection with proxy solicitation.
- (5) Net gain from securities in investment accounts.
- (6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date.
- (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).

. : \*

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(8) Other revenue not related either directly or indirectly to the securities business. (See Instruction C):

22,166,910

(to page 1 but not less than

\$150 minimum)

Amounts for the fiscal period

Eliminate cents

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and ending June 20

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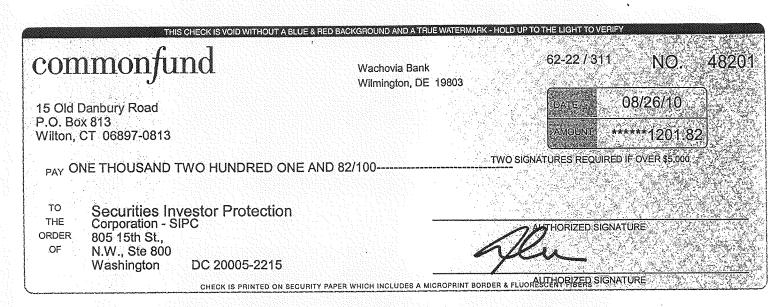
. 2010

- (9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA Line 13, Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.
  - (ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).

Enter the greater of line (i) or (ii)

**Total deductions** 

- 2d. SIPC Net Operating Revenues
- 2e. General Assessment @ .0025



### "48201" #031100225# 2079950035565#

ENDOR NO: 290	NAME: Securities Investo	NAME: Securities Investor Protection		NO. 4820' CHECK DATE: 08/26/10		
Invoice Number SIPC - 7 SICP - 7	Suffix Invoice Date 08/26/10	Description	Conversion of the second state of the second s	Dunt/Amt         Payment Amount           0.00         1201.82		
		TOTALS	1201.82	0.00 1201.82		

Commonfund Securities, Inc. 15 Old Danbury Road P.O. Box 812 Wilton, CT 06897-0812 Tel 203-563-5000 Fax 203-762-1092 www.commonfund.org

## commonfund

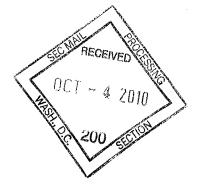
September 27, 2010

#### Via UPS Next Day Service

Financial Industry Regulatory Authority (FINRA) District 11 99 High Street, Suite 900 Boston, MA 02110

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Attention: Frank T. Kotopoulos Examination Manager



RE: Commonfund Securities, Inc. - CRD NO. 43541

Dear Mr. Kotopoulos:

As a follow up to your letter dated September 22, 2010, please find enclosed one copy each of the following items:

- 1. SIPC Supplemental Report pursuant to SEC Rule 17a-5(e)(4)
- 2. Form X-17A-5 Part III Facing Page
- 3. Your letter dated September 22, 2010

Please do not hesitate to contact the undersigned or our Managing Director of Compliance, Kevin Power (203-563-5148), should you have any questions.

Very truly vours. Ann V. Chu

Controller Commonfund Securities, Inc.

Cc: via mail

#### FINRA - Boston

FINRA/Financial Operations 99 High Street, Suite 900 Boston, MA 02110 Attn: George Malley

<u>FINRA-Maryland</u> FINRA/Financial Operations