

# UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

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

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#### **FACING PAGE**

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

A. REGISTRAN	IT IDENTIFICATION		
			OFFICIAL USE O
IAME OF BROKER-DEALER:		-	FIRM ID. NO.
IBS SECURITIES, L.L.C.		9=8	
DDRESS OF PRINCIPAL PLACE OF BUSINESS: (I	Do not use P.O. Box No.)	Mail Fro	cessing
721 E. Madison	Suite 100	MAR f	11 4010
(No. and Street)			<u> </u>
Villa Park	Illinois	6018 <b>t</b> vashir	aton, DC
(City)	(State)		06
		(Area Code – Teleph	one No)
B. ACCOUNTAN	NT IDENTIFICATION	(Area Code – Teleph	one No)
	on is contained in this R		60604
NDEPENDENT PUBLIC ACCOUNTANT whose opini  Ryan & Juraska, Certified Public Accounta  (Name – if individual, state last, first, middle name)	on is contained in this R	eport*	
NDEPENDENT PUBLIC ACCOUNTANT whose opini  Ryan & Juraska, Certified Public Accounta (Name – if individual, state last, first, middle name)  141 West Jackson Boulevard, Suite 2250	on is contained in this Rants  Chicago  (City)	leport*  Illinois  (State)	60604

<sup>\*</sup>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).

### **OATH OR AFFIRMATION**

I, <u>Angelo</u> knowledge and belief t	J. Catuara the accompanying financia	, swear (or affirm) I statement and supporting	that, to the best of my schedules pertaining to
the firm of IBS Se	curities, L.L.C, as	of <b>December 31, 2009</b>	, are true and correct. I
		any nor any partner, propri	
follows:	etary interest in any accou	int classified solely as that o	or a customer, except as
TOHOWS.	NONE		
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		, 0	Signature  Malma
		Μ	γλ
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		,	litte
Subscribed and sworn	to before me this		
	to bololo me tino		
$25^{TH}$ day of $\frac{1}{2}$	1.4		
$\frac{13}{100}$ day of $\frac{1}{100}$	<u>eV</u> , 2010		
		<b>,</b>	<b>~~</b>
0		OFFICIAL SEAL	<b>}</b>
		LINDA STONE NOTARY PUBLIC - STATE OF ILLIN	iois <b>\$</b>
Jank		MY COMMISSION EXPIRES:12/01	/10
Notary Public		<del></del>	كممم
-	check all applicable boxes)	):	
[X] (a) Facing page			
* * .	of Financial Condition.		
,	of Income (Loss).	PC	
• • • •	of Changes in Financial Co		Dransiatoria
• • • •	or Changes in Stockholder s	s Equity or Partners' or Sole	riophetors
Capital. [ ] (f) Statement o	of Changes in Liabilities Su	bordinated to Claims of Cre	ditors
	n of Net Capital.	bordinated to claims or cro-	untoro.
		erve Requirements Pursuan	t to Rule 15c3-3.
		or control Requirements U	
		explanation, of the Comput	
		mputation for Determination	
	its Under Exhibit A of Rule		
		d unaudited Statements of F	inancial
	vith respect to methods of o	consolidation.	·
[X] (I) An Oath or A			
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	te the date of the previous		
	t Auditors' Report on Interr	_	Customers'
		s and Funds in Segregation its Pursuant to CFTC Rule 1	
		in nortions of this filing see	



#### RYAN & JURASKA

Certified Public Accountants

141 West Jackson Boulevard Chicago, Illinois 60604

Tel: 312.922.0062 Fax: 312.922.0672

#### **INDEPENDENT AUDITORS' REPORT**

To the Members of IBS Securities, L.L.C.

We have audited the accompanying statement of financial condition of IBS Securities, L.L.C. as of December 31, 2009, and the related statements of operations, changes in members' equity and cash flows for the year then ended that you are filing pursuant to Rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. Our audit included consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of IBS Securities, L.L.C. as of December 31, 2009, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in the supplementary schedules is presented for purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by Rule 17a-5 under the Securities Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in our audit of the basic financial statements and, in our opinion, is fairly stated in all material respects, in relation to the basic financial statements taken as a whole.

Chicago, Illinois February 22, 2010

Piyan & Juraska

# STATEMENT OF FINANCIAL CONDITION December 31, 2009

### **ASSETS**

Cash Due from affiliates Investment in securities, at fair value (cost \$ 56,550) Other assets	\$	271,216 540,959 59,460 79,066
	\$ _	950,701
LIABILITIES AND MEMBERS' EQUITY		
Liabilities		
Accounts payable	<b>\$</b> _	4,490
		4,490
Members' Equity		946,211
	\$	950,701

### STATEMENT OF OPERATIONS Year Ended December 31, 2009

Revenues	
Commissions	\$ 825
Unrealized (loss) in securities	(14,670)
Interest	996
	(12,849)
Expenses	
Office and other expense	63,715
Clearing fees	16,785
Professional fees	12,289
	92,789
Net (loss)	\$ (105,638)

### STATEMENT OF CHANGES IN MEMBERS' EQUITY Year Ended December 31, 2009

Balance, January 1, 2009	\$ 1,026,916
Contributions	124,933
Withdrawals	(100,000)
Net (loss)	 (105,638)
Balance, December 31, 2009	\$ 946,211

### STATEMENT OF CASH FLOWS Year Ended December 31, 2009

Operating activities	•	(405.000)
Net (loss)	\$	(105,638)
Adjustments to reconcile net income to net		
cash used in operating activities:		
Changes in operating assets and liabilities:		(440.000)
Due from affiliates		(410,262)
Other assets		18,136
Investment in securities, at fair value		14,671
Accounts payable		(948)
Net cash used in operating activities		(484,041)
Financing activities		
Members' contributions		124,933
Members' withdrawals		(100,000)
Net cash provided by financing activities		24,933
Net decrease in cash		(459,108)
Cash, beginning of year		730,324
Cash, end of year	\$	271,216

# NOTES TO FINANCIAL STATEMENTS December 31, 2009

#### 1. Organization and Business

IBS Securities L.L.C. (the "Company") is a registered broker-dealer in securities under the Securities Exchange Act of 1934 and a member of The Financial Industry Regulatory Authority ("FINRA"). As of March 15, 2000, the merger of IBS Securities Incorporated and IBS Securities L.L.C formed the Company. The Company assumed all obligations and received all assets and registrations of IBS Securities Incorporated.

The Company acts as a correspondent broker on a fully disclosed basis. Revenue is derived from proprietary trading of securities and commodity futures contracts and commissions from processing orders for securities transactions on behalf of its customers.

The Company has made application for membership in the National Securities Clearing Corporation ("NSCC") and the Depository Trust & Clearing Corporation ("DTCC") to become a Self-Clearing Securities Firm. Management anticipates that this application will be approved. The Company is subject to the Recordkeeping, Risk Assessment and Reporting Requirements of SEC Rules 17h-1T and 17h-2T concerning its affiliate, Integrated Brokerage Services, LLC which under these regulations is considered to be a Material Associated Person ("MAP") of IBS Securities, LLC.

#### 2. Summary of Significant Accounting Policies

#### Income Taxes

For income tax reporting purposes, the Company is a partnership, therefore, no federal income tax is provided in the Company's financial statements and the partners will be responsible for income taxes, if any, on an individual basis.

The Company adopted FASB Interpretation No. 48 ("FIN 48") as of January 1, 2009, which clarifies the accounting for uncertainty in income taxes recognized in an enterprise's financial statements in accordance with Statement No. 109 Accounting for Income Taxes. FIN 48 prescribes a recognition threshold and measurement attribute for the financial statement recognition and measurement of a tax position taken or expected to be taken in a tax return. FIN 48 also provides guidance on de-recognition of tax benefits, classification on the balance sheet, interest and penalties, accounting in interim periods, disclosure, and transition.

The Company continues to evaluate uncertain tax positions, if any, and income tax contingencies under Statement No. 5, Accounting for Contingencies. SFAS No. 5 requires the Company to accrue for losses it believes are probable and can be reasonably estimated. Management believes the impact of FIN 48 on its financial position and results of operations will have an immaterial effect on its financial statements.

#### Securities and Commodities Owned

Proprietary securities and commodities transactions are recorded on the transaction date; positions are marked to market with related gains and losses recognized currently in income. Gains and losses on open commodity futures and options on futures contracts, if any, which are marked to market, are recognized currently in income.

# NOTES TO FINANCIAL STATEMENTS December 31, 2009

#### 2. Summary of Significant Accounting Policies, continued

#### **Securities Valuation**

Investments in securities are stated at fair value. Fair value is the estimated amount for which an investment could be exchanged in a current transaction between willing parties other than in a forced or liquidation sale. Cost is used as fair value for investments that are not traded on a national exchange and have no indication of value impairment.

#### **Use of Estimates**

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. Actual results could differ from those estimates.

#### 3. Net Capital Requirements

The Company is a broker-dealer subject to the Securities and Exchange Commission's Uniform Net Capital Rule (15c3-1).

At December 31, 2009, the Company had net capital and net capital requirements of approximately \$317,267 and \$100,000, respectively.

#### 4. Off Balance Sheet Risk and Concentration of Credit Risk

In the normal course of business, securities transactions of customers of the Company are introduced and cleared through MF Global Inc.

Pursuant to agreements between the Company and MF Global Inc., MF Global Inc. has the right to charge the Company for unsecured losses that result from a customer's failure to complete such transactions. The Company does not anticipate nonperformance by customers. The Company has a policy of reviewing, as considered necessary, the credit standing of each customer with which it conducts business.

At December 31, 2009, a significant credit concentration consisted of cash deposited in two banks. The balances exceeded federally insured limits by \$19,875 which represents 2.1% of the Company's equity. The Company has not experienced any losses in such accounts. Management believes that the Company is not exposed to any significant credit risk on cash.

#### 5. Due From Affiliates

Net amounts due from entities with common ownership at December 31, 2009 amounted to \$540,959.

#### 6. Derivative Financial Instruments

The Company enters into transactions of derivative financial instruments, which include commodity futures contracts, for trading purposes.

## NOTES TO FINANCIAL STATEMENTS December 31, 2009

#### 7. Computer Software Developed for Internal Use

The Company has adopted the American Institute of Certified Public Accountants Statements of Position 98-1 "Accounting for the Costs of Computer Software Developed or Obtained for Internal Use." Accordingly, during the preliminary project and post implementation/operation, costs are expensed in the period they are incurred. During the application development costs incurred are capitalized. The amount of application development costs capitalized at December 31, 2009 amounted to \$21,406.

#### 8. Fair Value Disclosure

The Company adopted Statement of Financial Accounting Standards No. 157 ("SFAS No. 157") as of January 1, 2008, which requires, among other things, enhanced disclosures about investments that are measured and reported at fair value. SFAS No. 157 establishes a hierarchy that prioritizes the inputs to valuation techniques. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. A fair value measurement assumes that the transaction to sell the asset or transfer the liability occurs in the principal market for the asset or liability or, in the absence of a principal market, the most advantageous market. The fair value hierarchy prioritizes the inputs to valuation techniques used to measure fair value into three broad levels:

<u>Level 1 Inputs</u> - quoted prices in active markets for identical assets or liabilities at the reporting date.

<u>Level 2 Inputs</u> - other than quoted prices included with Level 1 that are observable for substantially the full term of the asset or liability, either directly or indirectly. Level 2 assets include quoted prices for similar assets or liabilities in active markets; quoted prices for identical or similar assets or liabilities that are not active; and inputs other than quoted prices that are observable, such as models or other valuation methodologies.

<u>Level 3 Inputs</u> - unobservable inputs for the valuation of the asset or liability. Level 3 assets include investments for which there is little, if any, market activity. These inputs require significant management judgment or estimation.

The following table presents the Company's fair value hierarchy for those assets and liabilities measured at fair value on a recurring basis as of December 31, 2009:

	_	Level 1 Assets
		Securities Owned
Stocks	\$	59,460

At December 31, 2009, the Company did not have any level 2 or level 3 investments.

SUPPLEMENTAL SCHEDULES

# FINANCIAL AND OPERATIONAL COMBINED UNIFORM SINGLE REPORT PART III

	COMPUTATION OF NET CAPITA	L			
1.	Total ownership (from Statement of Financial Condition-Item 1800)		\$_	946,211	[3480]
2.	Deduct: Ownership equity not allowable for net capital		·		[3490]
3.	Total ownership equity qualified for net capital		\$_	946,211	[3500]
4.	Add:  A. Liabilities subordinated to claims of general creditors allowable in computati  B. Other (deductions) or allowable subordinated liabilities	on of net capital	\$ _		[3520] [3525]
5.	Total capital and allowable subordinated liabilities		\$_	946,211	[3530]
6.	Deductions and/or charges:  A. Total non-allowable assets from Statement of Financial Condition (Note B and C) (See detail below)  1. Additional charges for customers' and non-customers' security accounts  2. Additional charges for customers' and non-customers' commodity accounts  B. Aged fail-to-deliver  1. Number of items [3450]  C. Aged short security differences- less reserved of  2. Number of items [3470]  D. Secured demand note deficiency  E. Commodity futures contract and spot commodities proprietary capital charges  F. Other deductions and/or charges  G. Deductions for accounts carried under Rule 15c3-1(a)(6), (a)(7)and (c)(2)(x)  H. Total deduction and/or charges	620,025 [3540] [3550] [3560] [3570] [3580] [3600] [3610]	\$	(620,025)	[3620]
7. •	Other additions and/or allowable credits (List)		_	326,186	[3630] [3640]
8. 9.	Net Capital before haircuts on securities positions  Haircuts on securities (computed, where applicable pursuant to 15c3-1(f)):  A. Contractual securities commitments  B. Subordinated securities borrowings  C. Trading and Investment securities  6. Bankers' acceptance, certificates of deposit, and commercial paper  2. U.S. and Canadian government obligations  3. State and municipal government obligations  4. Corporate obligations  5. Stocks and warrants  6. Options  7. Arbitrage  8. Other securities  D. Undue concentration  E. Other (List)	[3660] [3670] [3680] [3690] [3700] [3710] [3730] [3730] [3732] [8,919] [3650] [3736]	* — \$	(8,919)	[3740]
	E. Other (List)	[3/30]	Φ	(0,919)	[3/40]

Note: There are no material differences between the audited computation of net capital and that per the Company's unaudited FOCUS report as filed.

620,025

Other assets

# FINANCIAL AND OPERATIONAL COMBINED UNIFORM SINGLE REPORT PART III

BROKER OR DEALER:

**IBS SECURITIES, L.L.C.** 

as of **December 31, 2009** 

12. I 13. I 14. I	COMPUTATION OF BASIC NET CAPITAL REQUIREMENT  Minimum net capital required (6-2/3% of line 19)  Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital requirement of subsidiaries computed in accordance with Note (A)  Net capital requirement (greater of line 11 or 12)  Excess net capital (line 10 less 13)  Excess net capital at 1000% (line 10 less 10% of line 19)	\$ \$ \$	299 100,000 100,000	[375
11.   12.   13.   14.	Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital requirement of subsidiaries computed in accordance with Note (A)  Net capital requirement (greater of line 11 or 12)  Excess net capital (line 10 less 13)	\$ \$	100,000	[375
12. I 13. I 14. I	Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital requirement of subsidiaries computed in accordance with Note (A)  Net capital requirement (greater of line 11 or 12)  Excess net capital (line 10 less 13)	\$ \$	100,000	-
14. I	Net capital requirement (greater of line 11 or 12) Excess net capital (line 10 less 13)	\$		[375
14. I	Excess net capital (line 10 less 13)	· —	100.000	[376
		· —	217,267	[37
		\$	197,267	[37
	COMPUTATION OF AGGREGATE INDEBTEDNESS			
16.	Total A.I. liabilities from Statement of Financial Condition	\$	4,490	[37
	Add:	Ψ	7,100	į.
ı	A. Drafts for immediate credit  B. Market value of securities borrowed for which no equivalent value is paid or credited  [3800]			[38:
	C. Other unrecorded amounts (List) [3820]			[38:
	Deduct: Adjustment based on deposits in Special Reserve Bank Accounts (15c3-1(c)(1)(vii))	• —	4.400	[384
	Total aggregate indebtedness	\$ %	4,490 1.42	[38
	Percentage of aggregate indebtedness to net capital (line 19 – by line 10)	<sup>70</sup>	1.42	Į
21. F	Percentage of aggregate indebtedness to net capital <u>after</u> anticipated capital withdrawals (line 19- by line 10 less item 4880 page 11)			[38
	COMPUTATION OF ALTERNATE NET CAPITAL REQUIREMENT			
Part B 22. 2	2% of combined aggregate debit items as shown in Formula for Reserve Requirements pursuant to Rule 15c-3-3 prepared as of the date of the net capital computation including both brokers or dealers and consolidated subsidiaries debits			[38
23. <b>I</b>	Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital requirement of subsidiaries computed in accordance with Note (A)	\$	<u>-</u>	[388]
24. 1	Net capital requirement (greater of line 22 or 23)	\$	-	[376
25. F	Excess net capital (line 10 less 24)	\$	-	[39
26. F	Percentage of Net Capital to Aggregate Debits (line 10 ÷ by line 17 page 8)			[38
27. F	Percentage of Net Capital, <u>after</u> anticipated capital withdrawals, to Aggregate Debits (line 10 less item 4880, page 11 ÷ by line 17 page 8)			[38
28.	Net capital in excess of: 5% of combined aggregate debit items or \$300,000	\$	-	[392
	OTHER RATIOS			
art C				
29. F	Percentage of debt to debt-equity total computed in accordance with Rule 15c3-1(d)			[386
30. (	Options deductions/Net Capital ratio (1000% test) total deductions exclusive of liquidating equity under Rule 15c3-1(a)(6), (a)(7) and (c)(2)(x) ÷ Net Capital			[38
NOTES:	The minimum net capital requirement should be computed by adding the minimum dollar net capital requirement of the reand, for each subsidiary to be consolidated, the greater of:  1. Minimum dollar net capital requirement, or 2. 6-2/3% of aggregate indebtedness or 2% of aggregate debits if alternative method is used.	eporting I	broker dealer	
3. <b>3</b> .	Do not deduct the value of securities borrowed under subordination agreements of secured demand notes covered by sub- not in satisfactory form and the market values of memberships in exchanges contributed for use of company (con- partners securities which were included in non-allowable assets.  For reports filed pursuant to paragraph (d) of Rule 17a-5, respondent should provide a list of material non-allowable assets.	ordinatior tra to ite	n agreements m 1740) and	

# COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS PURSUANT TO RULE 15c3-3 December 31, 2009

The Company did not handle any customer cash or securities during the year ended December 31, 2009 and do not have any customer accounts.

#### **IBS SECURITIES, L.L.C.**

# COMPUTATION FOR DETERMINATION OF PAIB RESERVE REQUIREMETNS PURSUANT TO RULE 15c3-3 December 31, 2009

The Company did not handle any proprietary accounts of introducing brokers during the year ended December 31, 2009 and does not have any PAIB accounts.

#### **IBS SECURITIES, L.L.C.**

# INFORMATION RELATING TO THE POSSESSION OR CONTROL REQUIREMENTS UNDER RULE 15c3-3 December 31, 2009

The Company did not handle any customer cash or securities for the year ended December 31, 2009 and does not have any customer accounts.



#### RYAN & JURASKA

Certified Public Accountants

141 West Jackson Boulevard Chicago, Illinois 60604

Tel: 312.922.0062 Fax: 312.922.0672

## INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL

To the Members of IBS Securities, L.L.C.

In planning and performing our audit of the financial statements of IBS Securities, L.L.C. (the "Company") for the year ended December 31, 2009, we considered its internal control structure, including control activities for safeguarding securities, in order to determine our auditing procedures for the purpose of expressing our opinion on the financial statements and not to provide assurance on the internal control.

Also, as required by Rule 17a-5(g)(1) of the Securities and Exchange Commission (the "SEC"), we have made a study of the practices and procedures followed by the Company, including tests of such practices and procedures that we considered relevant to the objectives stated in Rule 17a-5(g) in making the periodic computations of aggregate indebtedness (or aggregate debits) and net capital under Rule 17a-3(a)(11) and for determining compliance with the exceptive provisions of Rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company in any of the following:

- (1) Making quarterly securities examinations, counts, verifications, and comparisons
- (2) Recordation of differences required by Rule 17a-13
- (3) Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System

The management of the Company is responsible for establishing and maintaining an internal control structure and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of internal control structure policies and procedures, and of the practices and procedures referred to in the preceding paragraph, and to assess whether those practices and procedures can be expected to achieve the SEC's above-mentioned objectives. Two of the objectives of an internal control structure and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in accordance with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control or the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A control deficiency exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A significant deficiency is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control.

A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. We did not identify any deficiencies in internal control and control activities for safeguarding securities that we consider to be material weaknesses, as defined above.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures were adequate at December 31, 2009 to meet the SEC's objectives.

This report is intended solely for the information and use of management, the SEC, The Financial Industry Regulatory Authority ("FINRA"), and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

Chicago, Illinois

February 22, 2010

Ryan & Juraska

# FINANCIAL STATEMENTS AND SUPPLEMENTARY SCHEDULES PURSUANT TO SEC RULE 17a-5(d)

**December 31, 2009**