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	UNITED STATES SECURITIES AND EXCHANGE COMMI Washington, D.C. 20549 ANNUAL AUDITED PERFORM X-174-5 FORM X-174-5 PART IN MAR FACING PAGE Required of Brokers and Dealers Parts cities Exchange Act of 1934 and Rule	2 2 2010 SEC FILE NUMBER 8-65273 Rant to Section 17 of the
REPORT FOR THE PERIOD E	BEGINNING 1.01.09 AN	VD ENDING 12.31.09 MM/DD/YY
	A. REGISTRANT IDENTIFICATI	
NAME OF BROKER-DEALER	Boomermy capin	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PL	ACE OF BUSINESS: (Do not use P.O. Box No.	.) FIRM I.D. NO.
	10 ZOWAYTON ANE	
0	(No. and Street)	
20NAy Por	<u>ک</u>	06853
	(State)	(Zip Code)
DODOUE 14 7.	MBER OF PERSON TO CONTACT IN REGAT $M \leftarrow DODOCO \leftarrow H$	203.855.1723
	-	(Area Code – Telephone Number)
	<b>B. ACCOUNTANT IDENTIFICATI</b>	ON
INDEPENDENT PUBLIC ACC	OUNTANT whose opinion is contained in this R	Report*
FLAM	Gmy CPA	
	(Name – if individual, state last, first, mid	(dle name)
1109 LAWR	mer RUMO NORAL	Bellmore Sy 11210
(Address)	(City)	(State) (Zip Code)
CHECK ONE:		
Certified Public A		
Public Accountan	it	
Accountant not re	sident 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)

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)

## OATH OR AFFIRMATION

PONOULIF 7. ML PONOULI , swear (or affirm) that, to the best of I, my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of BOOMERING CAPINI VIC \_\_, 20 **D 9**\_\_\_, are true and correct. I further swear (or affirm) that of Jzczniber 31 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: ure Title C A CARBONARA Notary Public Notary Public My Commission Expires 6/30/2011 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. (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. (1) An Oath or Affirmation.  $\square$  (m) A copy of the SIPC Supplemental Report.  $\rightarrow / \rightarrow$ (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).



**Financial Industry Regulatory Authority** 

VIA CERTIFIED MAIL NO. 7008 3230 0001 2717 5453

March 5, 2010

Mr. Donough P. McDonough Managing Director Boomerang Capital LLC 140 Rowayton Avenue Rowayton, CT 06853

RE: Boomerang Capital LLC

Dear Mr. McDonough:

This acknowledges receipt of your December 31, 2009 annual filing of audited financial statements made pursuant to U.S. Securities and Exchange Commission (SEC) Rule 17a-5(d) (the Rule). The report as submitted appears deficient in that it did not contain the following:

1. A SIPC Supplemental Report pursuant to SEC Rule 17a-5(e)(4).

Based on the above, your filing does not comply with the requirements of the Rule. The text of the Rule is reproduced in the *NASD Manual* under the section titled *SEC Rules*. We urge you to review the Rule with your independent accountant.

Pursuant to the provisions of NASD Rule 8210, we request that you send one copy of the item listed above to this office and to the appropriate SEC regional or district office, and two copies to the SEC Washington, D.C. office. Your submissions must include a new completed Form X-17A-5 Part III Facing Page, a copy of which is enclosed for your convenience.

Please respond to this matter by **April 5, 2010**. Questions may be addressed to Kathryn E. Travers, Regulatory Coordinator at (617) 532-3456.

Sincerely,

Frank T. Kotopoulos Exam Manager

FTK/bmd Enclosure: Form X-17A-5 Part III Facing Page

cc:

Andrew D. Caverly, Assistant Regional Director Securities and Exchange Commission

Gary M. Flaum, CPA 1109 Lawrence Road N. Bellmore, NY 11710

Investor protection. Market integrity.

Boston District Office 99 High Street - Suite 900 Boston, Ma 02110 t 617 532 3400 f 617 451 3524 www.finra.org GARY M. FLAUM CERTIFIED PUBLIC ACCOUNTANT 1109 LAWRENCE ROAD NORTH BELLMORE, NEW YORK 11710



February 15, 2010

To the Members of Boomerang Capital, LLC 140 Rowayton Avenue – Suite C Rowayton, CT 06853

## Independent Accountant's Report on Applying Agreed-Upon Procedures Related to an Entity's SIPC Assessment Reconciliation

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, I have performed the procedures enumerated below with respect to the accompanying 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 Boomerang Capital LLC and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and SIPC solely to assist you and the other specified parties in evaluating Boomerang Capital LLC compliance with the applicable instructions of the Transitional Assessment Reconciliation (Form SIPC-7T). Boomerang Capital LLC management is responsible for the Boomerang Capital LLC 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, I 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 I performed and my findings are as follows:

- 1. Compared the listed assessment payments in Form SIPC-7T with respective cash disbursements records entries noting no differences;
- Compared the Total Revenue amounts of the audited Form X-17A-5 for the period April 1, 2009 to December 31, 2009 less revenue reported on the FOCUS reports for the period January 1, 2009 to June 30, 2009, as applicable, with the amounts reported in Form SIPC-7T for the period from 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;

March 13, 2010 Page -2-

- 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; and
- 5. Compared the amount of any overpayment applied to the current assessment with the Form SIPC-7T on which it was originally computed noting no differences.

I was not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, I do not express such an opinion. Had I performed additional procedures, other matters might have come to my 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.

Gary M. Flaum

GMF/bf Enclosure

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SI		800, Washing 2-371-8300	gton, D.C. 20005-22	TION 15	SIPC-7	Г
(29-	REV 12/09) Transitional Ass (Read carefully the instructions in y				(29-REV 12/09	9)
	TO BE FILED BY ALL SIPC M					
1. Na purp	ame of Member, address, Designated Examining Authorit oses of the audit requirement of SEC Rule 17a-5:	y, 1934 Act re	gistration no. and mor	nth in which fisc	al year ends for	μ
	Boomercung CapitalLI 140 Roway AON AVE	requires	any of the information correction, please e-m pc.org and so indicate	iail any correcti	ions to	ING COPY
1	140 Roway ADN AVE ROWAYTON, CT 06853		d telephone number of 1g this form.			<b>WORKING</b>
L		DONOL	ugh McDono	ugh, 203	-855-1723	_>
2. A	General Assessment [item 2e from page 2 (not less that	an \$150 minin	um)]	\$10	19	
Β.	Less payment made with SIPC-6 filed including \$150 paid 7-15 - 09 Date Paid	with 2009 SIF	'C-4 (exclude interest)	(3	37	_)
C.	Less prior overpayment applied		с. Х	(		· )
D.	Assessment balance due or (overpayment)			68	V	'
E.	Interest computed on late payment (see instruction E)	forday	's at 20% per annum		•	_
F.	Total assessment balance and interest due (or overpay	ment carried	forward)	<u>\$ 61</u>	82	
G.	PAID WITH THIS FORM: Check enclosed, payable to SIPC Total (must be same as F above)	\$	682	_		
Н.	Overpayment carried forward	\$(		_)		
3. Su	bsidiaries (S) and predecessors (P) included in this form None	ı (give name a	and 1934 Act registrati	on number):		
perso that a	IPC member submitting this form and the n by whom it is executed represent thereby Il information contained herein is true, correct omplete.	BOOM	ERANG CAP	ITAL, LLI spership or öther organ	C ization)	
Dated	the day of MARCH, 2010.	PARA	NER	od Signature)		
This f for a	orm and the assessment payment is due 60 days afte period of not less than 6 years, the latest 2 years in	er the end of an easily acc	the fiscal year. Retai	in the Working	Copy of this form	1
<b>5</b> 0	ates:			:	· · ·	_

	Dates:	Postmarked	Received	Reviewed	. •		
	Calculat	ions	· · ·	Documentation	 	Forward	Сору
۲ ۲ ۲	Exceptio	ons:					• .
	)isposit	ion of exceptions:					
	ţ					•	

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

**\*** . .

		Amounts for the fiscal period beginning April 1, 2009 and ending <u>bec. 31</u> , 20 <u>09</u> Eliminate cents
Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)		s <u>413,742</u>
2b. Additions: (1) Total revenues from the securities business of subsidiarie predecessors not included above.	es (except foreign subsidiaries) and	•
(2) Net loss from principal transactions in securities in tradin	g accounts.	<u></u>
(3) Net loss from principal transactions in commodities in trac	ding accounts.	<u></u>
(4) Interest and dividend expense deducted in determining ite	em 2a.	
(5) Net loss from management of or participation in the under	writing or distribution of securities.	·
(6) Expenses other than advertising, printing, registration fee profit from management of or participation in underwriting		-
(7) Net loss from securities in investment accounts.	(7) Net loss from securities in investment accounts.	
Total additions		0
2c. Deductions:		
(1) Revenues from the distribution of shares of a registered of investment trust, from the sale of variable annuities, from advisory services rendered to registered investment comp accounts, and from transactions in security futures produ	the business of insurance, from investment panies or insurance company separate	
(2) Revenues from commodity transactions.		
(3) Commissions, floor brokerage and clearance paid to other securities transactions.	r SIPC members in connection with	· · · · · · · · · · · · · · · · · · ·
(4) Reimbursements for postage in connection with proxy soli	citation.	
(5) Net gain from securities in investment accounts.		
(6) 100% of commissions and markups earned from transactic (ii) Treasury bills, bankers acceptances or commercial pa from issuance date.		
(7) Direct expenses of printing advertising and legal fees include related to the securities business (revenue defined by Se		5952
(8) Other revenue not related either directly or indirectly to the (See Instruction C):	he securities business.	• • • • • • .
(9) (i) Total interest and dividend expense (FOCUS Line 22/P Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	PART IIA Line 13, \$	
<ul><li>(ii) 40% of interest earned on customers securities accou</li><li>(40% of FOCUS line 5, Code 3960).</li></ul>	nts \$	
Enter the greater of line (i) or (ii)		
Total deductions		5952
2d. SIPC Net Operating Revenues		\$ 407,790
2e. General Assessment @ .0025		\$ 1,019
	2	(to page 1 but not less than \$150 minimum)