



#### 16012119

SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

SEC Mail ProcANNUAL AUDITED REPORT Section **FORM X-17A-5** PART III

FEB 292016

OMB APPROVAL

OMB Number: 3235-0123 Expires: March 31, 2016

Estimated average burden hours per response..... 12.00

SEC FILE NUMBER

**8-** 53569

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

REPORT FOR THE PERIOD BEGINNING	01/01/2015	AND ENDING_	12/31/2015
	MM/DD/YY		MM/DD/YY
A. REGI	STRANT IDENTII	FICATION	
NAME OF BROKER-DEALER: EUREKA CAPITA	AL MARKETS, LLC		OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)			FIRM I.D. NO.
555 ANTON BOULEVARD, SUITE 910			
	(No. and Street)		16
COSTA MESA	CA		92626
(City)	(State)		(Zip Code)
NAME AND TELEPHONE NUMBER OF PER SVETLANA SIMKINA	SON TO CONTACT II	N REGARD TO THIS R	EPORT 646-277-8428 (Area Code – Telephone Number
B. ACCO	UNTANT IDENTI	FICATION	
INDEPENDENT PUBLIC ACCOUNTANT who	ose opinion is contained	d in this Report*	
CohnReznick LLP		-	
(N	ame - if individual, state las	st, first, middle name)	
1301 AVENUE OF THE AMERICAS	NEW YORK	NY	10019
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:			
☐ Certified Public Accountant			
☑ Public Accountant			
☐ Accountant not resident in United	States or any of its po	ssessions.	
F	OR 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)

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.

Eureka Capital Markets, LLC (A Limited Liability Company)

Report on Financial Statements (With Supplementary Information and Report of Independent Registered Public Accounting Firm)

Year Ended December 31, 2015

## OATH OR AFFIRMATION

Ι, _	SVETLANA SIMKINA			, swear (or affirm) that, to the best of
my	knowledge and belief the accompanying financia	ıl statem	ent and	d supporting schedules pertaining to the firm of
	EUREKA CAPITAL MARKETS, LLC			, as
of	DECEMBER 31,	, 20	15	, are true and correct. I further swear (or affirm) that
	ther the company nor any partner proprietor pri			or director has any proprietary interest in any account
	ssified solely as that of a customer, except as foll	•		s universities and any propriesary interest in any account
Cia	solition solity as that of a customer, except as for	0443.		
				Signature
	1			Digitature .
				MANAGING DIRECTOR
				Title
	O/O/O			$e_{\perp}$
	1 / Cun / /			January .
	Notary Public			JOHN CERULLI
тh	is you set ** southing (shook all applicable howes)			Titolary Fublic - State of Manuals
X	is report ** contains (check all applicable boxes): (a) Facing Page.			Qualified in No.
X	(b) Statement of Financial Condition.			My Commission Expires Aug 24, 2019
X	(c) Statement of Income (Loss).			3 Aug 24, 2019
X	(d) Statement of Changes in Financial Condition	n.		
X	(e) Statement of Changes in Stockholders' Equ		rtners'	or Sole Proprietors' Capital.
	(f) Statement of Changes in Liabilities Subordi			
X	(g) Computation of Net Capital.			
X	(h) Computation for Determination of Reserve			
X	(i) Information Relating to the Possession or C			
				Computation of Net Capital Under Rule 15c3-1 and the
_	Computation for Determination of the Reservation			
	• •	naudited	State	ments of Financial Condition with respect to methods of
150	consolidation.			
X	(1) An Oath or Affirmation.			
X	(m) A copy of the SIPC Supplemental Report.	. F 1	4- 0:-:	ist an farmed to have quieted since the date of the more in a die
X	(n) A report describing any material inadequaci	es tound	to exi	ist 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).

## EUREKA CAPITAL MARKETS, LLC (A LIMITED LIABILITY COMPANY)

က ပ

 $\Gamma$ 

 $\Box$ 

 $\Box$ 

 $\Box$ 

רח

 $\cup$ 

7

 $\Box$ 

U

 $\Box$ 

## <u>Index</u>

Facing Page	
	<u>Page</u>
Report of Independent Registered Public Accounting Firm	2
Statement of Financial Condition December 31, 2015	3
Statement of Income Year Ended December 31, 2015	4
Statement of Changes in Member's Equity Year Ended December 31, 2015	5
Statement of Cash Flows Year Ended December 31, 2015	6
Notes to Financial Statements	7-10
Supplemental Schedules Required by Rule 17a-5 of the Securities Exchange Act of 1934:	
<ul> <li>I - Computation of Net Capital         Under Rule 15c3-1 of the Securities and Exchange Commission         December 31, 2015     </li> </ul>	11
<ul> <li>II - Computation for Determination of Reserve Requirements</li> <li>Under Rule 15c3-3 of the Securities and Exchange Commission</li> <li>December 31, 2015</li> </ul>	12
III - Information Relating to the Possession or Control Requirements Under Rule 15c3-3 of the Securities and Exchange Commission December 31, 2015	13



## Report of Independent Registered Public Accounting Firm

To the Member of Eureka Capital Markets, LLC

We have audited the accompanying statement of financial condition of Eureka Capital Markets, LLC (a Delaware limited liability company and a wholly-owned subsidiary of Eureka Capital Partners, LLC) (the "Company") as of December 31, 2015, and the related statements of income, changes in member's equity, and cash flows for the year then ended that are filed 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 the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. The Company is not required to have, nor were we engaged to perform, an audit of its internal control over financial reporting. 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 the Company as of December 31, 2015, and the results of its operations and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

The supplemental information contained in Schedules I, II and III has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The supplemental information is the responsibility of the Company's management. Our audit procedures included determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the supplemental information. In forming our opinion on the supplemental information, we evaluated whether the supplemental information, including its form and content, is presented in conformity with Rule 17a-5 of the Securities Exchange Act of 1934. In our opinion, the supplemental information is fairly stated, in all material respects, in relation to the financial statements as a whole.

CohnReynickZLP

New York, New York February 24, 2016

## STATEMENT OF FINANCIAL CONDITION DECEMBER 31, 2015

## **ASSETS**

Cash	\$ 1,680,651
Accounts receivable	 20,000
Total	\$ 1,700,651

## **LIABILITIES AND MEMBER'S EQUITY**

Liabilities: Accrued expenses Commissions payable Due to Parent Total liabilities	\$ 6,261 6,500 274,293 287,054
Member's equity	 1,413,597
Total	\$ 1,700,651

## STATEMENT OF INCOME YEAR ENDED DECEMBER 31, 2015

Revenue:	
Fee income	\$ 5,788,659
Interest income	208
Total revenue	5,788,867
Expenses:	
Commissions	2,282,931
Compensation and benefits	427,878
Bad debt expense	211,261
Rent	172,553
Regulatory fees	33,920
Professional fees	65,937
Marketing	32,251
Communications	22,387
Travel and entertainment	35,093
Office supplies	44,245
Consulting	27,244
Other	81,410_
Total expenses	3,437,110
Income before income taxes	2,351,757
Provision for income taxes	43,697
Net income	\$2,308,060_

## STATEMENT OF CHANGES IN MEMBER'S EQUITY YEAR ENDED DECEMBER 31, 2015

Balance, beginning of year	\$ 805,537
Net income	2,308,060
Distributions	 (1,700,000)
Balance end of year	\$ 1 413.597

## STATEMENT OF CASH FLOWS YEAR ENDED DECEMBER 31, 2015

Operating activities:  Net income  Adjustments to reconcile net income to net cash provided by operating activities:	\$ 2,308,060
Bad debt expense	211,261
Changes in operating assets and liabilities:  Accounts receivable	293,739
Commissions payable	(177,250)
Due to Parent	16,795
Accrued expenses	 (1,702)
Net cash provided by operating activities	 2,650,903
Financing activities - distributions	 (1,700,000)
Net increase in cash	950,903
Cash, beginning of year	 729,748
Cash, end of year	 1,680,651
Supplemental disclosure of cash flow data: Taxes paid	\$ 7,280

#### NOTES TO FINANCIAL STATEMENTS

## Note 1 - Business and summary of significant accounting policies: Business:

Eureka Capital Markets, LLC, a Limited Liability Company, (the "Company") is a wholly-owned subsidiary of Eureka Capital Partners, LLC ("ECP") (the "Parent"). The Company was organized on February 8, 2001 as a Delaware limited liability company and is registered to do business in California as a foreign limited liability company. The Company is a registered broker-dealer under the Securities Exchange Act of 1934 and is a member of the Financial Industry Regulatory Authority, Inc. ("FINRA") and a member of Securities Investor Protection Corporation ("SIPC"). The operating agreement provides for the limited liability company to exist in perpetuity. There is only one class of member. The individual member's liability is limited to capital contributed. The Company renders financial advisory services to selected clients with respect to merger and acquisition ("M&A") transactions, Employee Stock Ownership Plan ("ESOP") transactions, business restructurings, capital raising and other corporate finance assignments.

The Company operates under the provisions of paragraph (k)(2)(i) of Rule 15c3-3 of the Securities Exchange Act of 1934 which provides that the Company carries no margin accounts, promptly transmits all customer funds and delivers all securities received in connection with the Company's activities as a broker or dealer, and does not otherwise hold funds or securities for, or owe money or securities to, customers.

The accompanying financial statements have been prepared from the separate records maintained by the Company and, due to certain transactions and agreements with affiliated entities, may not necessarily be indicative of the financial condition that would have existed or the results that would have been obtained from operations had the Company operated as an unaffiliated entity.

#### Use of estimates:

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

#### Revenue recognition:

Revenues are recognized when earned and arise from financial advisory services provided by the Company to its clients. The Company bills for its services in three ways. First, revenues arise from work based upon hourly rates, second from retainer payments, and third from success fees based upon results experienced by the client. Fees received that are earned only upon a contingent event are recorded as deferred revenue until the event occurs.

#### NOTES TO FINANCIAL STATEMENTS

## Note 1 - Business and summary of significant accounting policies (continued): Allowance for doubtful accounts:

The Company assesses the financial strength of its customers. Periodically, the Company evaluates its accounts receivable and provides for an allowance for doubtful accounts equal to the estimated uncollectible amounts. The Company's estimate is based on a review of the current status of the individual accounts receivable. It is reasonably possible that the Company's estimate of the provision for doubtful accounts will change.

#### Income taxes:

The accompanying financial statements do not contain a provision for Federal and state income taxes since the Company's net income or loss is included in the Federal and state income tax returns of its member, ECP.

For New York City Unincorporated Business Tax ("UBT") purposes, the Company is included in the consolidated UBT tax return that is filed by ECP. Pursuant to a tax-sharing policy, UBT for the Company, which is subject to an apportionment formula, is determined on the basis of its separate taxable income.

The Company accounts for UBT pursuant to the asset and liability method which requires deferred income tax assets and liabilities to be computed for temporary differences between the financial statement and tax bases of assets and liabilities that will result in taxable or deductible amounts in the future based on enacted tax laws and rates applicable to the periods in which the temporary differences are expected to affect taxable income. Valuation allowances are established when necessary to reduce deferred tax assets to the amount expected to be realized. A deferred tax provision and the related deferred tax assets and liabilities are recorded by the Company based upon the expected future tax consequences of temporary differences generated as a result of its own operations. There were no material deferred tax assets or liabilities at December 31, 2015.

The Company has no unrecognized tax benefits at December 31, 2015. The Company's Federal and state income tax returns prior to fiscal year 2012 are closed. Management continually evaluates expiring statutes of limitations, audits, proposed settlements, changes in tax law and new authoritative rulings.

The Company recognizes interest and penalties associated with tax matters, if applicable, as part of other expenses and includes accrued interest and penalties in accrued expenses in the statement of financial condition. The Company did not recognize any interest or penalties associated with tax matters for the year ended December 31, 2015.

## **NOTES TO FINANCIAL STATEMENTS**

## Note 1 - Business and summary of significant accounting policies (concluded): Marketing:

Marketing costs are expensed as incurred. Marketing expense totaled \$32,251 for the year ended December 31, 2015.

## Subsequent events:

The Company has evaluated subsequent events through February 24, 2016, the date when these financial statements were issued. The Company is not aware of any significant events that occurred subsequent to the statement of financial condition date but prior to the filing of this report that would have a material impact on the financial statements.

## Note 2 - Related party transactions:

A significant amount of the Company's operating expenses for the year ended December 31, 2015 were paid by ECP. The Company and ECP have an expense sharing agreement, as they utilize common services and facilities. The expense sharing agreement provides for the Company to reimburse ECP \$50,000 per month for operating expenses relating to its broker-dealer activities. The Company's share of operating expenses was approximately 67% of total costs for marketing, communications, travel and entertainment, professional fees, certain taxes, office supplies, rent, dues and subscriptions, insurance and other miscellaneous expenses and approximately 50% of total compensation and benefits costs. Certain consulting, insurance, regulatory, professional fees, referral fees, and taxes related to its broker-dealer activities are paid directly by the Company. In September 2015, the monthly management fee the Company paid to ECP was increased from \$50,000 to \$90,000. The monthly management fee was increased to \$274,293 in December 2015. At December 31, 2015, due to Parent represents unpaid management fees.

The Company shares office space with ECP. ECP has allocated rent expense of \$172,553 to the Company for the year ended December 31, 2015.

One of ECP's members serves as a director of a company to which the Company provided advisory services in 2015. Total revenues billed by the Company to this client totaled \$35,000 in 2015.

## Note 3 - Commissions payable:

Commissions are due and payable only when the accounts receivable have been collected by the Company. As of December 31, 2015, there is \$6,500 in outstanding commissions payable.

## Note 4 - Concentrations of credit risk:

The Company has \$20,000 outstanding accounts receivable due from two clients as of December 31, 2015.

The Company's top three clients accounted for approximately 59% of revenues for the year ended December 31, 2015.

#### Cash:

At December 31, 2015, cash and cash equivalents consisted of insured checking and interest bearing accounts. From time to time, the Company may have cash balances in excess of the federally insured limits.

## Note 5 - Net capital requirement:

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. Rule 15c3-1 also provides that equity capital may not be withdrawn or cash distributions paid if the resulting net capital ratio would exceed 10 to 1. At December 31, 2015, the Company has net capital of \$1,400,097 which was \$1,380,960 in excess of its required net capital of \$19,137. The Company's ratio of aggregate indebtedness to net capital was 0.21 to 1.

## Note 6 - Contingencies:

The Company received a complaint filed on February 27, 2014 in the Supreme Court of the State of New York, County of New York, naming the Company and two of the Company's employees, among others, as defendants. On October 27, 2014, the claim was dismissed with prejudice. On August 26, 2015, the plaintiff filed an appeal. The Company believes that the allegations are without merit and intends to vigorously defend the matter. The Company also believes that the probability of an unfavorable outcome or loss related to the allegations and an estimate of the amount or range of loss, if any, from an unfavorable outcome are not determinable at this time.

# SCHEDULE I - COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION DECEMBER 31, 2015

Net capital:		
Total member's equity	\$	1,413,597
Deductions and/or charges: Nonallowable assets - accounts receivable		(20,000)
Additions and/or allowable credits:  Commissions payable		6,500
Net capital	\$	1,400,097
Aggregate indebtedness	\$	287,054
Computation of basic net capital requirement:  Minimum net capital required (greater of 6-2/3% of aggregate indebtedness or \$5,000)	\$	19,137
Excess of net capital	\$	1,380,960
Excess net capital at 1,000%	\$	1,371,392
Ratio of aggregate indebtedness to net capital	====	0.21 to 1

No material discrepancies exist between the above computation and the computation included in the Company's corresponding unaudited Form X-17A-5 Part IIA filed on January 26, 2015

See Report of Independent Registered Public Accounting Firm.

# **EUREKA CAPITAL MARKETS, LLC** SCHEDULE II - COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS UNDER RULE 15c3-3 OF THE SECURITIES AND EXCHANGE COMMISSION **DECEMBER 31, 2015** The Company is exempt from the provision of Rule 15c3-3 as of December 31, 2015 under the Securities Exchange Act of 1934, in that the Company's activities are limited to those set forth in the conditions for exemption appearing in paragraph (k)(2)(i). See Report of Independent Registered Public Accounting Firm.

# SCHEDULE III - INFORMATION RELATING TO THE POSSESSION OR CONTROL REQUIREMENTS UNDER RULE 15c3-3 OF THE SECURITIES AND EXCHANGE COMMISSION DECEMBER 31, 2015

The Company does not carry securities accounts for customers or perform custodial functions relating to customer securities.

The Company is exempt from the provision of Rule 15c3-3 as of December 31, 2015 under the Securities Exchange Act of 1934, in that the Company's activities are limited to those set forth in the conditions for exemption appearing in paragraph (k)(2)(i).

See Report of Independent Registered Public Accounting Firm.



## Report of Independent Registered Public Accounting Firm

To the Member of Eureka Capital Markets, LLC

We have reviewed management's statements, included in the accompanying Eureka Capital Markets, LLC Exemption Report, in which (1) Eureka Capital Markets, LLC identified the following provisions of 17 C.F.R. §15c3-3(k) under which Eureka Capital Markets, LLC claimed an exemption from 17 C.F.R. §240.15c3-3(2)(i) (the "exemption provisions") and (2) Eureka Capital Markets, LLC stated that Eureka Capital Markets, LLC met the identified exemption provisions throughout the most recent fiscal year without exception. Eureka Capital Markets, LLC's management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about Eureka Capital Markets, LLC's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(2)(i) of Rule 15c3-3 under the Securities Exchange Act of 1934.

New York, New York

CohnReynickZZF

February 24, 2016

## **BEUREKA**

## Eureka Capital Markets, LLC Exemption Report

Eureka Capital Markets, LLC (the "Company") is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. § 240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

- (1) The Company claimed an exemption from 17 C.F.R. § 240.15c3-3 under the provisions of 17 C.F.R. § 240.15c3-3 (k) (2) (i);
- (2) The Company met the identified exemption provisions in 17 C.F.R. § 240.15c3-3(k)(2)(i) throughout the most recent fiscal year without exception.

Eureka Capital Markets, LLC

I, Lana Simkina, affirm that, to my best knowledge and belief, this Exemption Report is true and correct.

By: Lana Simkina

Title: Managing Director

February 24, 2016



## Independent Accountant's Agreed-upon Procedures Report on Schedule of Assessment and Payments (Form SIPC-7)

To the Member of Eureka Capital Markets, 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 Schedule of Assessment and Payments (Form SIPC-7) to the Securities Investor Protection Corporation (SIPC) for the year ended December 31, 2015, which were agreed to by Eureka Capital Markets, LLC (the "Company"), and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and SIPC, solely to assist you and the other specified parties in evaluating the Company's compliance with the applicable instructions of Form SIPC-7. 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-7 with respective cash disbursement records entries from the detailed general ledger, noting no differences;
- 2) Compared the amounts reported on the audited Form X-17A-5 for the year ended December 31, 2015, as applicable, with the amounts reported in Form SIPC-7 for the year ended December 31, 2015, noting no differences;
- Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers, noting no differences;
- 4) Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7, noting no differences; and

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.

New York, New York February 24, 2016

CohnReynickZZF

# (33-REV 7/10)

# SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington. D.C. 20090-2185 202-371-8300

## General Assessment Reconciliation

(33-REV 7/10)

For the fiscal year ended 12/31/2015 (Read carefully the instructions in your Working Copy before completing this Form)

## TO BE FILED BY ALL SIDE MEMBERS WITH FISCAL YEAR ENDINGS

1. Name of Member, address, Designated Examining a purposes of the audit requirement of SEC Rule 17a-5	Authority, 1934 Act registration			
22*22******3212************************		Note: If any of the information shown on the mailing label requires correction, please e-mail any corrections to form@sipc.org and so indicate on the form filed.		
EUREKA CAPITAL MARKETS LLC 555 ANTON BLVD STE 910 COSTA MESA CA 92626-7099		Name and telephone number of person to contact respecting this form.		
2. A. General Assessment (item 2e from page 2)		s_14,472.17		
B. Less payment made with SIPC-6 filed (exclude in	nterest)	( <u>\$\frac{12.00}{212.00}</u> )		
Date Paid		, ,		
C. Less prior overpayment applied		(		
D. Assessment balance due or (overpayment)		- 6, NBO 17		
E. Interest computed on late payment (see instruc	ction E) fordays at 20%	per annum		
F. Total assessment balance and interest due (or	overpayment carried forward)	\$6, 260 · 17		
G. PAID WITH THIS FORM: Check enclosed, payable to SIPC Total (must be same as F above)	s 6, 260	0.17		
H. Overpayment carried forward	\$( <u> </u>	)		
3. Subsidiaries (S) and predecessors (P) included in the state of the	this form (give name and 1934	Act registration number):		
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.	Eurelea (Name o	Cerp it A Part nos UC or Corlor A. Partnership or other organ.zati (n) (Authorized Signature)		
Dated the <b>25</b> day of <b>01</b> , 20 <u>16</u> .	Managii	y Director		
This form and the assessment payment is due 60 d for a period of not less than 6 years, the latest 2 y	days after the end of the Hsca rears in an easily accessible (	A year. Retain the Working Copy of this form place.		
<b></b> Dates:				
Postmarked Received  Calculations  Exceptions: Disposition of exceptions:	Reviewed			
Calculations	Documentation	Forward Copy		
Exceptions:				
Disposition of exceptions:	4			

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

Amounts for the fiscal period beginning 1/1/2015 and ending 12/31/2015

tem No. la. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)		s 5, 788, 867-16
<ul> <li>2b. Additions:         <ul> <li>(1) Total revenues from the securities business of subsidiaries (a predecessors not included above.</li> </ul> </li> </ul>	except foreign subsidiaries) and	
(2) Net loss from principal transactions in securities in trading ac	ccounts.	<b>5</b>
(3) Net loss from principal transactions in commodities in trading		
(4) Interest and dividend expense deducted in determining item 2	2a.	
(5) Net loss from management of or participation in the underwri	ting or distribution of securities.	
(6) Expenses other than advertising, printing, registration fees a profit from management of or participation in underwriting or	nd legal fees deducted in determining net distribution of securities.	
77 Net loss from securities in investment accounts.		
Total additions		5, 788, 867.10
c. Deductions: (1) Revenues from the distribution of shares of a registered oper investment trust, from the sale of variable annuities, from the advisory services rendered to registered investment compani accounts, and from transactions in security futures products.	e business of insurance, from investment ies or insurance company separate	· ø
(2) Revenues from commodity transactions.		<i>0</i>
(3) Commissions, floor brokerage and clearance paid to other SI securities transactions.	6	
(4) Reimbursements for postage in connection with proxy solicita	ation.	
(5) Net gain from securities in investment accounts.		
(6) 100% of commissions and markups earned from transactions (ii) Treasury bills, bankers acceptances or commercial paper from issuance date.	in (i) certificates of deposit and that mature nine months or less	
(7) Direct expenses of printing advertising and legal fees incurre related to the securities business (revenue defined by Section		
'8' Other revenue not related either directly or indirectly to the s See Instruction C): .	securities business.	
(Deductions in excess of \$100,000 require documentation)		
(9) (i) Total interest and dividend expense (FOCUS Line,22/PAR Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.	T IIA Line 13.	
<ul><li>(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).</li></ul>	s <b>0</b>	
Enter the greater of fine (i) or (ii)		
Total deductions		
d. StPC Net Operating Revenues		\$ 5,788,867.10
Re. General Assessment @ .0025		s 14,472.17
		(to pagě Ť, liňe 2.A.)