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

SE	C FILE NUMBER
8-	50982

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

1G01/01/2013	AND ENDING	12/31/2015				
MM/DD/YY		MM/DD/YY				
REGISTRANT IDENTIF	CATION					
fit Finance Securities, LL	.C	OFFICIAL USE ONLY				
BUSINESS: (Do not use P.O.)	Box No.)	FIRM I.D. NO.				
(No. and Street)						
MO		63141				
(State)	· · · · · · · · · · · · · · · · · · ·	(Zip Code)				
F PERSON TO CONTACT IN	REGARD TO THIS RE	PORT (314) 729-2210				
		(Area Code - Telephone Numbe				
CCOUNTANT IDENTIF	ICATION					
P						
(Name – if individual, state last	, first, middle name)					
St. Louis	MO	63101				
(City)	(State)	SEC (Zip Code)				
CHECK ONE:         Certified Public Accountant         Public Accountant         Accountant not resident in United States or any of its possessions.		Mail Processing Section FEB 292016 Washington LC				
				FOR OFFICIAL USE		413
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	MM/DD/YY REGISTRANT IDENTIF fit Finance Securities, LL BUSINESS: (Do not use P.O. 1 (No. and Street) MO (State) F PERSON TO CONTACT IN CCOUNTANT IDENTIF NT whose opinion is contained .P (Name – if individual, state last, St. Louis (City) nt United States or any of its pos	MM/DD/YY REGISTRANT IDENTIFICATION  fit Finance Securities, LLC BUSINESS: (Do not use P.O. Box No.)  (No. and Street) (No. and Street) (State) F PERSON TO CONTACT IN REGARD TO THIS RE  CCOUNTANT IDENTIFICATION  NT whose opinion is contained in this Report* .P (Name – if individual, state last, first, middle name) St. Louis MO (City) (State)				

\*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)

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February 26, 2016

Securities and Exchange Commission Registrations Branch Mail Stop 8031 100 F. Street, NE Washington, D.C. 20549

RE: Benefit Finance Securities, LLC CRD# 45113 Annual Audited Statements SEC Rule 17a-5

Ladies and Gentlemen:

Attached are Benefit Finance Securities, LLC's Statement of Financial Condition and financial statements with supplemental material for the year ended December 31, 2015.

Sincerely,

Fargo Scot Fargo

Principal

Enclosures 2

SEC Mail Processing Section FEB 292016

Washington DC 413

> Six CityPlace Drive, Suite 400 St. Louis, M0 63141-7164 *ph* 314.729.2200 *fax* 314.729.2292

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## **BENEFIT FINANCE SECURITIES, LLC**

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FINANCIAL STATEMENTS WITH SUPPLEMENTAL SCHEDULES AND REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

DECEMBER 31, 2015

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Washington DC 413

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#### Report of Independent Registered Public Accounting Firm

Member Benefit Finance Securities, LLC St. Louis, Missouri

We have audited the accompanying statement of financial condition of Benefit Finance Securities, LLC (a Missouri limited liability 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. These financial statements are the responsibility of Benefit Finance Securities, LLC'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. 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 Benefit Finance Securities, LLC 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.

Anders Minkler Huber & Helm LLn | 800 Market Street-Suite 500 ; St. Louis, MO 63101-2501 ; p (314) 635-5500 | f (314) 655-5501 | www.anderscpa.com

The Schedule 1, Computation of Net Capital In Accordance with Rule 15c3-1 Under the Securities Exchange Act of 1934 and Schedule 2, Exemption Report have been subjected to audit procedures performed in conjunction with the audit of Benefit Finance Securities, LLC's financial statements. The supplemental information is the responsibility of Benefit Finance Securities, LLC'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 17 C.F.R. §240.17a-5. In our opinion, the Schedule 1, Computation of Net Capital In Accordance with Rule 15c3-1 Under the Securities Exchange Act of 1934 and Schedule 2, Exemption Report are fairly stated, in all material respects, in relation to the financial statements as a whole.

Anders Mindele Huber ! Helm LEP

February 24, 2016

#### **OATH OR AFFIRMATION**

#### Scott Fargo

I, Scott Fargo	, swear (or affi	irm) that, to the best of
	f the accompanying financial statement and supporting schedules pertaining	ig to the firm of
Benefit Finance Se	curities, LLC	, as
of	December 31, 20 15 , are true and correct. I furthe	r 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:

NM M. FLEN NM. FL (INNINI) Signature Commission # 14433204 St. Louis County C.E.O Title Fr. ବ OF MIS Sion Expires otary Public <u>世</u>ロmmW

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. ×
- A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the □ (j) 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.
- $\mathbf{X}$ (1) 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).

## BENEFIT FINANCE SECURITIES, LLC STATEMENT OF FINANCIAL CONDITION DECEMBER 31, 2015

## <u>ASSETS</u>

Current Assets		
Cash and cash equivalents	\$	98,211
Prepaid FINRA renewal fees		12,058
FINRA deposits		1,661
Product compensation receivable	_	51,540
Total Current Assets	\$	163,470
LIABILITIES AND MEMBER'S EQUITY		
Current Liabilities		
Accrued expense	\$	870
Due to affiliate	_	1,110
Total Current Liabilities	—	1,980
Member's Equity	_	161,490
Total Liabilities and Member's Equity	\$	163,470

## BENEFIT FINANCE SECURITIES, LLC STATEMENT OF INCOME FOR THE YEAR ENDED DECEMBER 31, 2015

Revenue	
Fee income	\$ 614,508
Interest income	14
Total Revenue	614,522
Expenses	
Administrative services support fee	40,000
Bank charges	541
Legal fees	1,245
Office services	135,000
Professional fees	31,600
Taxes and licenses	17,553
Total Expenses	225,939
Net Income	\$388,583

## BENEFIT FINANCE SECURITIES, LLC STATEMENT OF CHANGES IN MEMBER'S EQUITY FOR THE YEAR ENDED DECEMBER 31, 2015

December 31, 2014	\$	77,907
Distributions		(305,000)
Net Income	_	388,583
December 31, 2015	\$	161,490

See notes to financial statements

## BENEFIT FINANCE SECURITIES, LLC STATEMENT OF CASH FLOWS FOR THE YEAR ENDED DECEMBER 31, 2015

Cash Flows from Operating Activities		
Net income	\$	388,583
Adjustments to reconcile net income to net cash		
provided by operating activities		
Change in assets - (increase) decrease		
Prepaid FINRA renewal fees		(1,131)
FINRA deposits		1,704
Due from affiliate		150
Product compensation receivable		(11,708)
Change in liabilities - increase (decrease)		
Accrued expense		(830)
Due to affiliate		1,110
Net Cash Provided by		
Operating Activities	_	377,878
Cash Flows from Financing Activities		
Distributions to member		(305,000)
Net Cash Used by Financing Activities	_	(305,000)
Net Decrease in Cash and cash equivalents		72,878
Cash and cash equivalents - Beginning of Period	_	25,333
Cash and cash equivalents - End of Period	\$	98,211

See notes to financial statements

## NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

#### Nature of Business

Benefit Finance Securities, LLC (the "Company") is a limited liability company formed in 1997 under the laws of the State of Missouri. The Company is a wholly-owned subsidiary of Bancorp Services, LLC ("Bancorp"). The Company is registered with the Securities and Exchange Commission (the "SEC") as a broker-dealer selling variable life insurance annuities and private placements. Also, the Company provides plan administration services for these variable life insurance contracts. The Company is a member of the Financial Industry Regulatory Authority ("FINRA") and operates under the exemptive provisions of SEC Rule 15c3-3(k)(1). The latest date upon which the Company is to dissolve is December 31, 2050.

#### **Basis of Presentation**

The accompanying financial statements have been prepared in accordance with the provisions of Financial Accounting Standards Board ("FASB"), Accounting Standards Codification, (the "FASB ASC"), which is the source of authoritative, non-governmental accounting principles generally accepted in the United States of America ("GAAP"). All references to authoritative accounting guidance contained in our disclosures are based on the general accounting topics within the FASB ASC.

#### **Use of Estimates in Financial Statements**

The preparation of the Company's financial statements in conformity with GAAP requires management to make estimates and assumptions that affect reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

#### Fair Value Measurements

The Company adopted "FASC 820, Fair Value Measurements", which defines fair value, establishes a framework for measuring fair value in GAAP, and expands disclosures about fair value investments. This guidance applies whenever fair value is the applicable measurement. The three general valuation techniques used to measure fair value are the market approach, cost approach, and income approach. The guidance establishes a fair value hierarchy which prioritizes the inputs to valuation techniques used to measure fair value into Levels 1, 2, and 3. Level 1 inputs consist of unadjusted quoted prices in active markets for identical instruments and have the highest priority. Level 2 inputs include quoted prices for similar instruments in active markets, quoted prices that are directly or indirectly observable. Level 3 inputs are unobservable and are given the lowest priority. Carrying amounts of certain financial instruments such as cash and cash equivalents, receivables and accounts payable approximate fair value due to their short maturities or because the terms are similar to market terms.

#### Cash and Cash Equivalents

The Company considers all short-term investments with an original maturity of three months or less at the time of purchase to be cash equivalents.

## NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

#### Product Compensation Receivable

Product compensation receivable are uncollateralized customer obligations due under normal trade terms.

The Company provides an allowance for doubtful accounts equal to the estimated losses that will be incurred in the collection of product compensation receivable, if any. When necessary, this estimate is based on historical experience coupled with a review of the current status of existing receivables. The allowance and associated product compensation receivable are reduced when the receivables are determined to be uncollectible. Currently, the Company considers product compensation receivable to be fully collectible.

#### **Concentration of Credit Risk**

Financial instruments, which potentially subject the Company to concentrations of credit risk, consist principally of cash and cash equivalents and receivables. The Company maintains its cash primarily with two financial institutions. Deposits in interest bearing and non-interest bearing accounts at these banks are insured by the Federal Deposit Insurance Corporation ("FDIC") up to \$250,000. At December 31, 2015, there were no cash balances in excess of federally insured limits at the bank. The Company performs ongoing credit evaluations of its customers, as needed, for potential credit losses. Although the Company is directly affected by the financial stability of its customer base, management does not believe significant credit risk exists at December 31, 2015.

#### **Revenue Recognition**

The Company receives commissions from the sale of certain corporate life insurance products. Revenue from premium related commissions is recognized at the point the premiums are paid. Other products pay commissions over time based on the value of assets held in the product. For these types of products, commission income is accrued and recognized over time.

Plan administration fees are derived and recognized over the term of the contract from policy administration pursuant to the sale by a retail broker-dealer of a related variable insurance contract.

In May 2014, the FASB issued Accounting Standards Update No. 2014-09, Revenue from Contracts with Customers (ASU 2014-09), which supersedes nearly all existing revenue recognition guidance under U.S. GAAP. The primary focus of ASU 2014-09 is to recognize revenues when promised goods or services are transferred to customers reflecting an amount that considers when an entity expects to be entitled to those goods or services. ASU 2014-09 defines a five step process to achieve this core principle and, in doing so, more judgment and estimates may be required within the revenue recognition process than are required under existing U.S. GAAP. The standard is effective for annual periods beginning after December 15, 2018, and interim periods therein, using either of the following transition methods: (i) a full retrospective approach reflecting the application of the standard in each prior reporting period with the option to elect certain practical expedients, or (ii) a retrospective approach with the cumulative effect of initially adopting ASU 2014-09 recognized at the date of adoption. We are currently evaluating the impact of our pending adoption of ASU 2014-09 on our financial statements and have not yet determined the method by which we will adopt the standard in 2019.

## NOTE 1 SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)

#### Income Taxes

The Company is formed as a single-member limited liability company and as such its operations are included in Bancorp's tax returns. Earnings are included in the personal tax returns of the members. Accordingly, the financial statements do not include a provision for income taxes.

The Company is required to evaluate tax positions taken (or expected to be taken) in the course of preparing the Company's tax returns and recognize a tax liability if the Company has taken an uncertain tax position that more likely than not would not be sustained upon examination by the applicable taxing authorities. The Company has analyzed the tax positions taken and has concluded that as of December 31, 2015, there are no uncertain tax positions taken, or expected to be taken, that would require recognition of a liability or disclosure in the financial statements.

If applicable, the Company recognizes interest and penalties related to unrecognized tax liabilities in the statement of income.

Management is required to analyze all open tax years, as defined by the Statute of Limitations, for all major jurisdictions, including federal and certain state taxing authorities. The Company is no longer subject to U.S. federal, state and local, or non-U.S. income tax examinations by taxing authorities for years before 2012. As of and for the year ended December 31, 2015, the Company did not have a liability for any unrecognized taxes. The Company has no examinations in progress and is not aware of any tax positions for which it is reasonably possible that the total amounts of unrecognized tax liabilities will significantly change in the next twelve months.

#### NOTE 2 NET CAPITAL REQUIREMENTS

The Company is subject to the SEC's Uniform Net Capital Rule (SEC Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to regulatory net capital, both as defined, shall not exceed 15 to 1. At December 31, 2015, the Company had net capital of \$96,231, which was \$91,231 in excess of its required net capital of \$5,000. The Company's net capital ratio was .02058 to 1.

## NOTE 3 RELATED PARTY TRANSACTIONS

The Company and BFP Securities, LLC ("BFPS"), a wholly-owned subsidiary of Benefit Finance Partners, LLC ("BFP"), which is 50 percent owned by Bancorp, are related by common ownership.

During 2015, the Company received commissions of \$523,075, through an agreement with BFPS.

Commissions, plan administration fees, and other advances may be due to and receivable from BFP and BFPS. As of December 31, 2015, the Company had a balance due from BFPS of \$51,540. As of December 31, 2015, the Company had a balance due to BFP of \$1,110.

The Company has an Expense Agreement with Bancorp to pay a monthly management fee for office space, and support in administration, finance, equipment, technology, sales, and marketing. The monthly fee increased from \$7,500 to \$15,000 during the year. Expenses under the agreement totaled \$135,000 for the year ended December 31, 2015.

## NOTE 4 RISKS AND UNCERTAINTIES

Changes to the Internal Revenue Code and other factors may affect the demand for variable insurance contracts. Also, a large part of the Company's customer base consists of companies in the banking industry. Economic difficulties by customers could lead to the surrender of existing insurance contracts and the resulting recognition of surrender charges. It is not currently possible for the Company to determine the likelihood or potential impact of the above uncertainties.

Revenue from two customers was 96 percent of the Company's revenue for the year ended December 31, 2015.

## NOTE 5 SUBSEQUENT EVENTS

The Company has evaluated subsequent events through February 24, 2016, the date the financial statements were available to be issued. It was concluded there were no events or transactions occurring during this period that required recognition or disclosure in the financial statements.

## BENEFIT FINANCE SECURITIES, LLC SCHEDULE 1 COMPUTATION OF NET CAPITAL, AGGREGATE INDEBTEDNESS, AND RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL UNDER RULE 15c3-1 DECEMBER 31, 2015

Net Capital		
Total Member's Equity	\$	161,490
Deductions and/or Charges Non-allowable assets		
Prepaid FINRA renewal fees FINRA deposits Product compensation receivable Total Deductions and/or Charges		12,058 1,661 51,540 65,259
Net Capital	\$	96.231
Aggregate Indebtedness	\$	1.980
Capital Requirements		
Minimum capital requirements (based on aggregate indebtedness) Minimum dollar net capital requirement Net capital requirement (greater of above)	\$	<u>132</u> <u>5,000</u> <u>5,000</u>
Excess net capital Net capital less greater of 10% of aggregate indebtedness	_	91,231
or 120% of minimum dollar net capital requirement	\$	90.231
Ratio of Aggregate Indebtedness to Net Capital		<u>0.02058 to 1</u>

There are no differences between the audited Computation of Net Capital above and the Company's corresponding computation in the unaudited Part IIA FOCUS Report.

#### BENEFIT FINANCE SECURITIES, LLC SCHEDULE 2 EXEMPTION REPORT

Benefit Finance Securities, LLC (the "Company") is a registered broker-dealer to Rule 17a-5 promulgated by the Securities and Exchange Commission. This Exemption Report was prepared as required by 17 C.F.R. section 240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

The Company met the identified exemption provision in 17 C.F.R. section 240.15c3-3(k)(1) throughout the year without exception.

#### **Benefit Finance Securitles, LLC**

I, Scott L Fargo, swear (or affirm) that, to my best knowledge and belief, this Exemption Report is true and

correct. By: Title: Chief Executive Office and CCO

February 24, 2016



## Report of Independent Registered Public Accounting Firm

Member Benefit Finance Securities, LLC St. Louis, Missouri

We have reviewed management's statements, included in the accompanying Schedule 2 -Exemption Report, in which (1) Benefit Finance Securities, LLC identified the following provisions of 17 C.F.R. §15c3-3(k) under which Benefit Finance Securities, LLC claimed an exemption from 17 C.F.R. §240.15c3-3:Provisions (1) and (2)(i) (the "exemption provisions") and (2) Benefit Finance Securities, LLC stated that Benefit Finance Securities, LLC met the identified exemption provisions throughout the most recent fiscal year without exception. Benefit Finance Securities, 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 Benefit Finance Securities, 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)(1) of Rule 15c3-3 under the Securities Exchange Act of 1934.

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February 24, 2016

Anders Minkler Huber & Helm LLP | 800 Market Street-Suite 500 | St. Louis, MO 63101-2501 | p (314) 655-5500 | f (314) 655-5501 | www.anderscpa.com



# Independent Accountants' Agreed-Upon Procedures Report on

Certification of Exclusion from Membership (Form SIPC-3)

Member Benefit Finance Securities, LLC St. Louis, Missouri

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Commission Act of 1934, we have performed the following procedure with respect to the accompanying Certification of Exclusion from Membership (Form SIPC-3) of Benefit Finance Securities, LLC for the year ended December 31, 2015 and filed with the Securities Investor Protection Corporation (SIPC) on December 23, 2014. The procedure we performed is as follows:

Compared the income reported on the audited Form X-17A-5 for the year ended December 31, 2015, to ascertain that the Certification of Exclusion from Membership (Form SIPC-3) was consistent with the income reported.

Because the above procedure does not constitute an audit made in accordance with PCAOB standards, we do not express an opinion on the above procedure. In connection with he procedure referred to above, no matters came to our attention that caused us to believe that the income reported on the audited Form X-17A-5 for the year ended December 31, 2015 was not consistent with the income reported on the Form SIPC-3 referred to above. Our procedure was performed solely to assist you in complying with the Rule 17a-5(e)(4), and our report is not to be used for any other purpose. This report relates solely to the procedure referred to above and does not extend to any financial statements of Benefit Finance Securities, LLC taken as a whole.

Section Minete Conflators & Alalan and

February 24, 2016

Anders Minkler Huber & Helm LL® | 800 Market Street-Suite 500 + St. Louis, MO 63101-2501 + p (314) 655-5500 + f (314) 655-5501 + www.anderscpa.com

1667 K Washin	Securities Investor Protection Corporation	Check appropriate boxes. (i) its principal business, in the determination of SIPC, taking into account business of affiliated entities, is conducted outside the United States and its territories and possessions;*
	1667 K Street NW, Ste 10000 Washington, DC 20006-1620	<ul> <li>(u) its business as a broker-dealer is expected to consist exclusively of:</li> <li>(I) the distribution of shares of registered open end investment companies or unit investment true is;</li> <li>(II) the sale of variable annuities,</li> </ul>
	Forwarding and Address Correction Requested	<ul> <li>(11) the business of insurance;</li> <li>(1V) the business of rendering lovestment advisory services to one or more registered investment companies or insurance company separate accounts;</li> </ul>
		(iii) it is registered pursuant to 15 U.S.C 780(b)(11)(A) as a broker-dealer with respect to transactions in securities futures products;
>		Pursuant to the terms of this form (detailed below). x 1-4-2016
( > •	8-	Authorized Signature Title Date
• ) )	8-050982 FINRA DEC 9/1/19 BENEFIT FINANCE SECURITIES LLC SIX CITYPLACE DRIVE SUITE 400 ST LOUIS, MO 63141-7164	Securities Investor Protection Corporation 1667 K Street NW, Ste 10000 Washington, DC 20006-1620

# **Form SIPC-3**

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# FY 2016\_

#### Certification of Exclusion From Membership.

TO BE FILED BY A BROKER-DEALER WHO CLAIMS EXCLUSION FROM MEMBERSHIP IN THE SECURITIES INVESTOR PROTECTION CORPORATION ("SIPC") UNDER SECTION 78ccc(a)(2)(A) OF THE SECURITIES INVESTOR PROTECTION ACT OF 1970 ("SIPA").

The above broker-dealer certifies that during the year ending <u>December 31, 2016</u> its business as a broker-dealer is expected to consist exclusively of one or more of the following (check appropriate boxes):

- (i) its principal business, in the determination of SIPC, taking into account business of affiliated entities, is conducted outside the United States and its territories and possessions;\*
  - (ii) its business as a broker-dealer is expected to consist exclusively of:
    - (1) the distribution of shares of registered open end investment companies or unit investment trusts;
    - (II) the sale of variable annuities;
    - (III) the business of insurance;
    - (IV) the business of rendering investment advisory services to one or more registered investment companies or insurance company separate accounts;
- (iii) it is registered pursuant to 15 U.S.C. 780(b)(11)(A) as a broker-dealer with respect to transactions in securities futures products;

and that, therefore, under section 78ccc(a)(2)(A) of SIPA it is excluded from membership in SIPC.

\*If you have any questions concerning the foreign exclusion provision please contact SIPC via telephone at 202-371-8300 or e-mail at asksipc@sipc.org to request a foreign exclusion questionnaire.

The following bylaw was adopted by the Board of Directors:

Interest on Assessments.

... If any broker or dealer has incorrectly filed a claim for exclusion from membership in the Corporation, such broker or dealer shall pay, in addition to all assessments due, interest at the rate of 20% per annum of the unpaid assessment for each day it has not been paid since the date on which it should have been paid.

In the event of any subsequent change in the business of the undersigned broker-dealer that would terminate such broker-dealer's exclusion from membership in SIPC pursuant to section 78ccc(a)(2)(A) of the SIPA, the undersigned broker-dealer will immediately give SIPC written notice thereof and make payment of all assessments thereafter required under section 78ddd(c) of the SIPA.

Sign, date and return this form no later than 30 days after the beginning of the year, using the enclosed return envelope.

Retain a copy of this form for a period of not less than 6 years, the latest 2 years in an easily accessible place.

SIPC-3 2016

- 「ア・アンアンアンアンアンアンアンアンアンアンアンアンアンアンデン - オンデンアンアンデンアンデンションデン - コンドン・シントン - コンドン・シントン

- オン・シオン オン オーマー オーション シストン ストン