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ANNUAL AUDITED REPORT **FORM X-17A-5**

MAK 1 4 2016

SEC FILE NUMBER 8-51721

PART III

FACING PAGE

Washington DC

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

| REPORT FOR THE PERIOD BEGINNING | 01/01/15 | AND ENDING | 12/31/15 |
|---|---------------------------------|--------------------|----------------------------|
| | MM/DD/YY | | MM/DD/YY |
| A. RE | GISTRANT IDENTI | FICATION | |
| NAME OF BROKER - DEALER: | | | |
| Reid & Rudiger, LLC | | | OFFICIAL USE ONLY |
| ADDRESS OF PRINCIPAL PLACE OF BUSI | NESS: (Do not use P.0 | D. Box No.) | FIRM ID. NO. |
| 55 Broad Street, Suite 28C, 28th Floor | | | |
| | and Street) | | |
| New York New | w York | | 10004 |
| (City) | State) | | (Zip Code) |
| NAME AND TELEPHONE NUMBER OF PE | RSON TO CONTACT | IN REGARD TO T | HIS REPORT |
| Marc Harrison, President | | | |
| | | | (908) 231-1000 |
| | | . (| Area Code - Telephone No.) |
| B. AC | COUNTANT IDENTI | FICATION | |
| INDEPENDENT PUBLIC ACCOUNTANT w | hose opinion is containe | ed in this Report* | |
| VB&T CERTIFIED PUBLIC ACCOUNTANT | CS PLLC | | |
| | f individual, state last, first | t, middle name) | |
| 250 West 57 th Street Ne | w York | New York | 10107 |
| (Address) (| City) | (State) | (Zip Code) |
| CHECK ONE: | | | |
| X Certified Public Accountant | | | |
| Public Accountant | | | |
| Accountant not resident in United State | s or any of its possessions | | |
| | FOR OFFICIAL USE C | NLY | |
| | | _ | |
| | | | |

SEC 1410 (06-02)

alb

^{*}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

| state: 2015 | nents a , are tru | rison, President swear (or affirm) that, to the best of my knowledge and belief the accompanying financi and supporting schedules pertaining to the firm of Reid & Rudiger, LLC (Company), as of December 31, we and correct. I further swear (or affirm) that neither the Company nor any partner, proprietor, principal rector has any proprietary interest in any account classified solely as that of a customer, except as follows: | 2 | | | |
|-------------|--|--|---|--|--|--|
| | | | _ | | | |
| | V. | lle Mezzalt Ma | _ | | | |
| | L. | KELLI MEZZATESTA | _ | | | |
| | NOT | ARY PUBLIC-STATE OF NEW YORK | | | | |
| | • | No. 01ME6092532 Marc Harrison, Managing Director unlittled in Richmond County | | | | |
| | My | commission Expires 5-19-19 | | | | |
| | | ubscribed to before me this 10 th day of March 2016. t contains (check all applicable boxes): | | | | |
| | | Report of Independent Registered Public Accounting Firm | | | | |
| (x) | (a) | Facing page. | | | | |
| (x) | (b) | Balance Sheet. | | | | |
| (x) | (c) | Statement of Operations. | | | | |
| (x) | (d) | Statement of Cash Flows | | | | |
| (x) | (e) Statement of Changes in Members' Equity. | | | | | |
| () | • • • | | | | | |
| (x) | | Notes to Financial Statements. | | | | |
| (x) | (g) | Computation of Net Capital for Brokers and Dealers | | | | |
| | | Pursuant to Rule 15c3-1 under the Securities Exchange Act of 1934. | | | | |
| () | (h) | Computation for Determination of Reserve Requirements for Brokers and Dealers | | | | |
| () | (*) | Pursuant to Rule 15c3-3 under the Securities Exchange Act of 1934. (not applicable) | | | | |
| () | (i) | Information Relating to the Possession or Control Requirements | | | | |
| | | for Brokers and Dealers Pursuant to Rule 15c3-3 under the | | | | |
| () | <i>(</i> ;) | Securities Exchange Act of 1934 (not applicable). | | | | |
| () | (j) | A Reconciliation, including Appropriate Explanations, of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve | | | | |
| | | Requirements Under Rule 15c3-3 (not applicable). | | | | |
| () | (k) | A Reconciliation Between the Audited and Unaudited Consolidated Statements of | | | | |
| () | (A) | Financial Condition With Respect to Methods of Consolidation (not applicable). | | | | |
| (x) | (1) | An Affirmation. | | | | |
| (x) | (m) | | | | | |
| $\ddot{}$ | (n) | A report describing any material inadequacies found to exist or found to have | | | | |
| . , | \ <u>'</u> | existed since the date of the previous audit (Supplemental Report on Internal | | | | |
| | | Control). | | | | |
| (x) | (o) | Review report on managements' assertion letter regarding (k)(2)(i). | | | | |
| (x) | (a) | Management's assertion letter regarding (k)(2)(i). | | | | |

Reid & Rudiger, LLC

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December 31, 2015

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REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Members of Reid & Rudiger, LLC

We have audited the accompanying financial statements of Reid & Rudiger, LLC, (the "Company") (a New York Limited Liability Company), which comprise the statement of financial condition as of December 31, 2015, and the related statements of income, changes in members' equity, and cash flows for the year then ended that are filed pursuant to Rule 17a-5 under the Securities Exchange Act of 1934, and the related notes to the financial statements and supplemental information. The company's management is responsible for these financial statements. 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 also includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements, 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 condition of Reid & Rudiger, 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.

Schedules I and II has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. This 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

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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.

VB&T CERTIFIED PUBLIC ACCOUNTANTS, PLLC

New York, NY February 1, 2016

REID & RUDIGER, L.L.C. STATEMENT OF FINANCIAL CONDITION DECEMBER 31, 2015

ASSETS

| Cash | \$ | 152,368 |
|--|-------------|---------|
| Receivable from clearing broker | | 282,115 |
| Clearing deposits | | 50,000 |
| Other receivable | | - |
| Property and equipment, net of depreciation of \$7,109 | | 35,759 |
| Prepaid expenses | | 22,330 |
| Security deposit | | 40,000 |
| Total Assets | \$ | 582,572 |
| | | |
| | | |
| | | |

LIABILITIES AND MEMBER'S EQUITY

| Accounts payable and accrued expenses | \$ | 35,546 |
|---------------------------------------|-------------|---------|
| Deferred rent | | 6,084 |
| Total Liabilities | | 41,630 |
| Contingencies | | - |
| Member's equity | | 540,942 |
| Total Liabilities and Member's Equity | \$ | 582,572 |

The accompanying notes are an integral part of these financial statements.

REID & RUDIGER, L.L.C. STATEMENT OF OPERATIONS FOR THE YEAR ENDED DECEMBER 31, 2015

| Revenues: | | |
|--|--|-----------|
| Commissions | \$ | 3,195,911 |
| Total Revenues | | 3,195,911 |
| Costs and Expenses: | | |
| Compensation and benefits | | 819,294 |
| Clearing expenses | | 65,904 |
| Guaranteed payments to members | | 430,000 |
| Commission expense | | 1,578,628 |
| Computer and telecomunications expense | | 28,317 |
| Professional fees | | 198,136 |
| Rent | | 149,370 |
| Office supplies and expense | | 216,644 |
| Telephone | | 23,504 |
| Postage and delivery | | 40,887 |
| Registration and license | | 48,845 |
| Quotations and research | | 37,377 |
| Insurance | | 2,344 |
| Travel | | 18,158 |
| Entertainment and promotion | | 30,435 |
| Seminars and training | | 352 |
| SIPC fee | | 7,826 |
| Total Expenses | ······································ | 3,696,021 |
| Income from operations | | (500,110) |
| Other Income | | |
| Interest income | | 136,688 |
| Net Income | \$ | (363,422) |

The accompanying notes are an integral part of these financial statements.

REID & RUDIGER, L.L.C. STATEMENT OF CHANGES IN MEMBER'S EQUITY FOR THE YEAR ENDED DECEMBER 31, 2015

| • | Total Member's Equity | | |
|----------------------------|--------------------------|--|--|
| Balance, January 1, 2015 | \$ 1,122,364 | | |
| Member's distribution | (218,000) | | |
| Net Income | (363,422) | | |
| Balance, December 31, 2015 | \$ 540,942 | | |

REID & RUDIGER, L.L.C. STATEMENT OF CASH FLOWS FOR THE YEAR ENDED DECEMBER 31, 2015

| Cash Flows Provided by Operating Activities: | |
|---|-----------------|
| Net Income | \$ (363,422) |
| Depreciation | 3,603 |
| Adjustment to reconcile net income to | |
| Increase in receivable from broker | (167,019) |
| Increase in prepaid expenses | (1,492) |
| Decrease in employee advance | 80,000 |
| Increase in accounts payable and accrued expenses | 4,494 |
| Decrease in deferred rent | (7,301) |
| Net Cash Provided By Operating Activities | (451,137) |
| Cash Flows From Investing Activities: Purchase of furniture | |
| Net Cash (Used) by Investing Activities | - |
| Cash Flows From Financing Activities: | |
| Member's distribution | (218,000) |
| Net Cash (Used) by Financing Activities | (218,000) |
| Net Increase In Cash | (669,137) |
| Cash at beginning of the year | 821,505 |
| Cash at end of the year | \$ 152,368 |

REID & RUDIGER, L.L.C. NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2015

1. ORGANIZATION AND NATURE OF BUSINESS

Reid & Rudiger L.L.C., ("Company") a Delaware Limited Liability Company formed March 18, 1998, commenced operations November 1, 1999 and is doing business as a retail brokerage firm. The Company is wholly-owned by Evermore Holdings, LLC and is a member of the Financial Industry Regulatory Authority (FINRA).

The Company clears all of its transactions through a securities clearing broker. The Company acts as a broker-dealer and is exempt from Securities and Exchange Commission Rule 15c3-3 under paragraph k(2)(ii) since it uses another securities firm for clearing transactions.

Pursuant to an agreement between the Company and RBC Dain Rauscher, Inc. (Dain), securities transactions of the Company are cleared through Dain and the customers of the Company are introduced and cleared on a fully disclosed basis. The Company is exempt from provisions of Rule 15c3-3 and is not responsible for compliance with Section 4(c) of Regulation T of the Board of Governors of the Federal Reserve System, as all customers' accounts, as defined by such rules, is carried by Dain.

2. SIGNIFICANT ACCOUNTING POLICIES

Revenue Recognition

Profits and losses from commissions realized on agency transactions are recorded on a settlement date, which is not materially different than recording transactions on a trade date. The financial statements of the Company are prepared on the accrual basis of accounting. Accordingly, fee income is recognized when earned.

Receivable from Clearing Broker

Receivable from clearing broker consists of money due from the Company's clearing broker (Dain) for income earned on securities transactions. Management has determined that no allowance for doubtful accounts is necessary at December 31, 2015. The amount due from the clearing broker (Dain) is \$282,115.

Clearing Deposit

The Company maintains a separate account with a cash balance of \$50,000.

Income Taxes

The Company is a limited liability Company taxed as a partnership and, therefore, the accompanying financial statements do not include any provision for federal or state income taxes. The company files a consolidated tax return with its parent company, Evermore Holdings, LLC and the members of Evermore Holdings, LLC are individually responsible for reporting their share of the Company's income or loss.

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 reported amounts of 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.

REID & RUDIGER, L.L.C. NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2015

3. NET CAPITAL REQUIREMENTS

The Company is a member of the FINRA and subject to the Securities and Exchange Commission's Uniform Net Capital Rule (Rule 15c3-1), which requires the maintenance of minimum net capital of \$5,000 and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At December 31, 2015, the Company had net capital of \$442,852 which was \$437,852 in excess of the amount required.

4. COMMITMENTS

Customer Transactions

In the normal course of business the Company executes, as agent, securities transactions on behalf of its customers. If the agency transactions do not settle because of failure to perform by either the customer or the counterparty, the Company may be obligated to discharge the obligation of the nonperforming party and, as a result, is subject to market risk if the market value of the securities is different from the contract amount of the transactions. The Company does not anticipate non-performance by customers or counterparties in the above situations. The Company's policy is to monitor its market exposure and counterparty risk. In addition, the Company has a policy of reviewing, as considered necessary, the credit standing of each counterparty and customer with which it conducts business.

5. LEASING ARRANGEMENTS

The Company entered into a lease to occupy the premises at 55 Broad Street, portion of the 28th floor, NYC on June 11, 2013, The lease covers 38 months (July 1, 2013 through August 31, 2016). The lease obligations are as follows:

January 1, 2016 – August 31, 2016

105,153 8 months

The Company posted a \$40,000 security deposit for the lease.

Electricity costs are sub metered.

6. PROPERTY AND EQUIPMENT

There were not any purchases of property and equipment during 2015. The depreciation for the year was \$7,109..

7. CONCENTRATION OF CREDIT RISK

The Company maintains its cash and cash equivalents balances at one financial institution in excess of the amount insured by the Federal Deposit Insurance Corporation. Management regularly monitors the financial condition of this institution in order to keep the potential risk to a minimum.

REID & RUDIGER, L.L.C. NOTES TO FINANCIAL STATEMENTS DECEMBER 31, 2015

8. SUBSEQUENT EVENTS

Management has evaluated subsequent events through February 1, 2016, the date on which the financial statements were available to be issued. Management is not aware of any subsequent events that require recognition or disclosure in the financial statements.

SCHEDULE I

REID & RUDIGER, L.L.C. COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES AND EXCHANGE COMMISSION DECEMBER 31, 2015

| NET CAPITAL: Total member's equity | \$ | 540,942 |
|--|----|----------|
| Deductions and/or charges: | Φ | 340,342 |
| Non-allowable assets: | | |
| Furniture and fixtures | | (35,760) |
| Prepaid expenses | | (22,330) |
| Security deposit | | (40,000) |
| Net capital before haircuts on securities positions | | 442,852 |
| Haircuts on securities positions | • | _ |
| Undue concentration | | |
| Net Capital | \$ | 442,852 |
| AGGREGATE INDEBTEDNESS: | | |
| Items included in the statement of financial condition: | | |
| Accounts payable and accrued expenses | \$ | 41,630 |
| COMPUTATION OF BASIC NET CAPITAL REQUIREMENT: | | · |
| Minimum net capital required (6-2/3% of aggregate indebtedness) | \$ | 2,775 |
| Minimum net capital required | \$ | 5,000 |
| Excess net capital | \$ | 437,852 |
| Net capital less greater of 10% of total AI or 120% of minimum net capital | \$ | 436,852 |
| Percentage of aggregate indebtedness to net capital is | | 9.4004% |

The above computation agrees with the December 31, 2015 computation of net capital filed electronically by the company on FOCUS Form X-17A-5 Part IIA.



Certified Public Accountants, PLLC

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Schedule II

REVIEW REPORT ON MANAGEMENT'S ASSERTION LETTER

To the Members of Reid & Rudiger, LLC

We have reviewed management's statements, included in the accompanying management assertion letter, in which (1) Reid & Rudiger, LLC (the "Company") identified the following provisions of 17 C.F.R. §240.15c3-3(k) under which the Company claimed an exemption from 17 C.F.R. §240.15c3-3: paragraph (k)(2)(ii) (the "exemption provisions") and (2) the Company stated that Reid & Rudiger, LLC met the identified exemption provisions throughout the most recent fiscal year without exception. The Company'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 the Company'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)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934.

VB&T CERTIFIED PUBLIC ACCOUNTANTS, PLLC

New York, NY February 1, 2016

> Registered with the Public Company Accounting Oversight Board Member of the American Institute of Certified Public Accountants



Certified Public Accountants, PLLC

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Independent Accountants Agreed-Upon Procedures Report on Schedule of Assessments and Payments (Form SIPC-7)

To the Members of Reid & Rudiger, 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 Reid & Rudiger, 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 Reid & Rudiger, LLC's compliance with the applicable instructions of the Transitional Assessment Reconciliation (Form SIPC-7). Reid & Rudiger, LLC's management is responsible for the Reid & Rudiger, LLC's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Public Company Accounting Oversight Board (United States). 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, 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;
- 3. 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 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-7 on which it was originally computed, noting no differences.

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

Registered with the Public Company Accounting Oversight Board Member of the American Institute of Certified Public Accountants 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

VB&T CERTIFIED PUBLIC ACCOUNTANTS, PLLC

New York, NY February 1, 2016

Reid & Rudiger, LLC

Assertions Regarding Exemption Provisions

We, as members of management of (Reid & Rudiger, LLC) ("the Company"), are responsible for compliance with the annual reporting requirements under Rule 17a-5 of the Securities Exchange Act of 1934. Those requirements compel a broker or dealer to file annuals reports with the Securities Exchange Commission (SEC) and the broker or dealer's designated examining authority (DEA). One of the reports to be included in the annual filing is an exemption report prepared by an independent public accountant based upon a review of assertions provided by the broker or dealer. Pursuant to that requirement, the management of the Company hereby makes the following assertions:

Identified Exemption Provision:

The Company claims exemption from the custody and reserve provisions of Rule 15c3-3 by operating under the exemption provided by Rule 15c3-3, Paragraph (k)(2)(ii).

Statement Regarding Meeting Exemption Provision:

The Company met the identified exemption provision without exception throughout the period ending January 1, 2015 through December 31, 2015.

Reid & Rudiger, LLC

| By: // | |
|----------------------------------|--|
| Marc Harrison, Managing Director | |
| February 1, 2016 | |

SIPC-7 (33-REV 7/10)

SECURITIES INVESTOR PROTECTION CORPORATION

P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300

General Assessment Reconciliation

SIPC-7(33-REV 7/10)

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

TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

| | | ne of Member, address, Designated Examining ses of the audit requirement of SEC Rule 17a-5 | | , 1934 Act re | gistration | no. and month | in which fis | scal year ends for | COPY |
|-----|-----|--|-------------|----------------------|--------------------------|--|--|----------------------|-------------------|
| | | 051721 FINRA DEC REID & RUDIGER LLC | | | | mailing label any correctio indicate on th | requires cor ns to form@s ne form filed, | | WORKING CO |
| | | 55 BROAD STREET 28TH FLOOR NEW YORK, NY 10004 | | | | Name and te contact respe | | ber of person to rm. | OR |
| | | | | | | • | N (908)23 | | > |
| | | | | | | | | | |
| 2. | A. | General Assessment (item 2e from page 2) | | | | | \$ | 7,826 | - |
| | В. | Less payment made with SIPC-6 filed (exclude in JULY 16, 2015 | nterest) | | | | (| 3,029 | _) |
| | ^ | Date Paid | | | | | , | | ١ |
| | | Less prior overpayment applied | | | | | (| 4.797 | -' |
| | | Assessment balance due or (overpayment) | ation El fu | ar day | - at 0.00/ r | or oppum | | 4,797 | - |
| | | Interest computed on late payment (see instruc- Total assessment balance and interest due (or | | • | , | oer annum | \$ | 4.797 | - |
| | | PAID WITH THIS FORM: Check enclosed, payable to SIPC | overpayii | iicht barricu | · | | - | | • |
| | | Total (must be same as F above) | | \$ | | 4,797 | | | |
| | Н. | Overpayment carried forward | | \$(| | |) | | |
| , | | sidiaries (S) and predecessors (P) included in t | this form (| (giv e name a | and 1934 A | Act registration | number): | | - |
| pe | sor | PC member submitting this form and the by whom it is executed represent thereby | | REID & | RUDIG | ER LLC | | | |
| | | I information contained herein is true, correct mplete. | | | (Name of | Corporation, Partne | rship or other orga | anization) | - |
| | | | | | · . · | (Authorized | Signature) | | - |
| Da | ted | the 22 day of JANAURY , 20 16 . | | FINOP | | (Title | 3) | • | - |
| for | a ļ | orm and the assessment payment is due 60 deriod of not less than 6 years, the latest 2 y | ears In a | n easily acc | the fiscal cessible p | year. Retain lace. | the Workin | g Copy of this form | - |
| FW | | Postmarked Received | Reviewe | | | | 5 | | |
| RFV | C | ates: Postmarked Received alculations xceptions: isposition of exceptions: | Docume | entation | | | FOI | rward Copy | - |
| IPC | , E | kceptions: | | | | | | | |
| U | D | isposition of exceptions: | | _ | | | | | |

DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Amounts for the fiscal period beginning JANUARY 1, 2015 and ending DECEMBER 31, 2015

| item No. | Eliminate cents |
|---|------------------------|
| 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030) | \$3,196,238 |
| Additions: (1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above. | |
| (2) Net loss from principal transactions in securities in trading accounts. | |
| (3) Net loss from principal transactions in commodities in trading accounts. | |
| (4) Interest and dividend expense deducted in determining item 2a. | |
| (5) Net loss from management of or participation in the underwriting or distribution of securities. | |
| (6) Expenses other than advertising, printing, registration fees and legal fees deducted in determining net profit from management of or participation in underwriting or distribution of securities. | |
| (7) Net loss from securitles in investment accounts. | |
| Total additions | 0 |
| Deductions: (1) Revenues from the distribution of shares of a registered open end investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security futures products. | |
| (2) Revenues from commodity transactions. | |
| (3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions. | 65,904 |
| (4) Reimbursements for postage in connection with proxy solicitation. | |
| (5) Net gain from securities in investment accounts. | <u></u> |
| (6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date. | |
| (7) Direct expenses of printing advertising and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act). | |
| (8) Other revenue not related either directly or indirectly to the securities business. (See Instruction C): | |
| (Deductions in excess of \$100,000 require documentation) | |
| (9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA Line 13, Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income. | |
| (ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960). | |
| Enter the greater of line (i) or (ii) | 0 |
| Total deductions | 65,904 |
| 2d. SIPC Net Operating Revenues | \$ |
| 2e. General Assessment @ .0025 | \$7,826 |
| | (to page 1, line 2.A.) |

SIPC-7 Instructions

This form is to be filed by all members of the Securities Investor Protection Corporation whose fiscal years end in 2011 and annually thereafter. The form together with the payment is due no later than 60 days after the end of the fiscal year, or after membership termination. Amounts reported herein must be readily reconcilable with the member's records and the Securities and Exchange Commission Rule 17a-5 report filed. Questions pertaining to this form should be directed to SIPC via e-mail at form@sipc.org or by telephoning 202-371-8300.

- A. For the purposes of this form, the term "SIPC Net Operating Revenues" shall mean gross revenues from the securities business as defined in or pursuant to the applicable sections of the Securities Investor Protection Act of 1970 ("Act") and Article 6 of SIPC's bylaws (see page 4), less item 2c(9) on page 2.
- B. Gross revenues of subsidiaries, except foreign subsidiaries, are required to be included in SIPC Net Operating Revenues on a consolidated basis except for a subsidiary filing separately as explained hereinafter.

If a subsidiary was required to file a Rule 17a-5 annual audited statement of income separately and is also a SIPC member, then such subsidiary must itself file SIPC-7, pay the assessment, and should not be consolidated in your SIPC-7.

SIPC Net Operating Revenues of a predecessor member which are not included in item 2a, were not reported separately and the SIPC assessments were not paid thereon by such predecessor, shall be included in item 2b(1).

- C. Your General Assessment should be computed as follows:
- (1) Line 2a For the applicable period enter total revenue based upon amounts reported in your Rule 17a-5 Annual Audited Statement of Income prepared in conformity with generally accepted accounting principles applicable to securities brokers and dealers. or if exempted from that rule, use X-17A-5 (FOCUS Report) Line 12, Code 4030.
- (2) <u>Adjustments</u>. The purpose of the adjustments on page 2 is to determine SIPC Net Operating Revenues.
 - (a) Additions Lines 2b(1) through 2b(7) assure that assessable income and gain items of SIPC Net Operating Revenues are totaled, unreduced by any losses (e.g., if a net loss was incurred for the period from all transactions in trading account securities, that net loss does not reduce other assessable revenues). Thus, line 2b(4) would include all short dividend and interest payments including those incurred in reverse conversion accounts, rebates on stock loan positions and repo interest which have been netted in determining line 2(a).
 - (b) <u>Deductions</u> Line 2c(1) through line 2c(9) are either provided for in the statue, as in deduction 2c(1), or are allowed to arrive at an assessment base consisting of net operating revenues from the securities business. For example, line 2c(9) allows for a deduction of either the total of interest and dividend expense (not to exceed interest and dividend income), as reported on FOCUS line 22/PART IIA line 13 (Code 4075), plus line 2b(4) or 40% of interest earned on customers' securities accounts (40% of FOCUS Line 5 Code 3960). Be certain to complete both line (i) and (ii), entering the greater of the two in the far right column. Dividends paid to shareholders are not considered "Expense" and thus are not to be included in the deduction. Likewise, interest and dividends paid to partners pursuant to the partnership agreements would also not be deducted.

If the amount reported on line 2c (8) aggregates to \$100,000 or greater, supporting documentation must accompany the form that identifies these deductions. Examples of support information include; contractual agreements, prospectuses,

and limited partnership documentation.

- (i) Determine your SIPC Net Operating Revenues, item 2d, by adding to item 2a, the total of item 2b, and deducting the total of item 2c.
- (ii) Multiply SIPC Net Operating Revenues by the applicable rate. Enter the resulting amount in item 2e and on line 2A of page 1.
- (iii) Enter on line 2B the assessment due as reflected on the SIPC-6 previously filed.
- (iv) Subtract line 2B and 2C from line 2A and enter the difference on line 2D. This is the balance due for the period.
- (v) Enter interest computed on late payment (if applicable) on line 2E.
- (vi) Enter the total due on line 2F and the payment of the amount due on line 2G.
- (vii) Enter overpayment carried forward (if any) on line 2H.
- D. Any SIPC member which is also a bank (as defined in the Securities Exchange Act of 1934) may exclude from SIPC Net Operating Revenues dividends and interest received on securities in its investment accounts to the extent that it can demonstrate to SIPC's satisfaction that such securities are held, and such dividends and interest are received, solely in connection with its operations as a bank and not in connection with its operations as a broker, dealer or member of a national securities exchange. Any member who excludes from SIPC Net Operating Revenues any dividends or interest pursuant to the preceding sentence shall file with this form a supplementary statement setting forth the amount so excluded and proof of its entitlement to such exclusion.
- E. <u>Interest on Assessments</u>. If all or any part of assessment payable under Section 4 of the Act has not been postmarked within 15 days after the due date thereof, the member shall pay, in addition to the amount of the assessment, interest at the rate of 20% per annum on the unpaid portion of the assessment for each day it has been overdue.
- F. Securities and Exchange Commission Rule 17a-5(e) (4) requires those who are not exempted from the audit requirement of the rule and whose gross revenues are in excess of \$500,000 to file a supplemental independent public accountants report covering this SIPC-7 no later than 60 days after their fiscal year ends.

Mail this completed form to SIPC together with a check for the amount due, made payable to SIPC, using the enclosed return PO BOX envelope or wire the payment to:
Bank Name: Citibank, New York
Swift: CITIUS33
ABA#: 021000089
Account Number: 30801482
Address: 111 Wall Street, New York, New York 10043 USA
On the wire identify the name of the firm and its SEC
Registration 8-# and label It as "for assessment."
Please fax a copy of the assessment form to (202)223-1679
or e-mail a copy to form@sipc.org on the same day as the wire.

From Section 16(9) of the Act:

The term "gross revenues from the securities business" means the sum of (but without duplication)—

- (A) commissions earned in connection with transactions in securities effected for customers as agent (net of commissions paid to other brokers and dealers in connection with such transactions) and markups with respect to purchases or sales of securities as principal;
 - (B) charges for executing or clearing transactions in securities for other brokers and dealers;
 - (C) the net realized gain, if any, from principal transactions in securities in trading accounts;
 - (D) the net profit, if any, from the management of or participation in the underwriting or distribution of securities;
 - (E) interest earned on customers' securities accounts;
- (F) fees for investment advisory services (except when rendered to one or more registered investment companies or insurance company separate accounts) or account supervision with respect to securities;
 - (G) fees for the solicitation of proxies with respect to, or tenders or exchanges of, securities;
 - (H) income from service charges or other surcharges with respect to securities;
- (I) except as otherwise provided by rule of the Commission, dividends and interest received on securities in investment accounts of the broker or dealer;
 - (J) fees in connection with put, call, and other options transactions in securities;
- (K) commissions earned for transactions in (I) certificates of deposit, and (ii) Treasury bills, bankers acceptances, or commercial paper which have a maturity at the time of issuance of not exceeding nine months, exclusive of days of grace, or any renewal thereof, the maturity of which is likewise limited, except that SIPC shall by bylaw include in the aggregate of gross revenues only an appropriate percentage of such commissions based on SIPC's loss experience with respect to such instruments over at least the preceding five years; and
 - (L) fees and other income from such other categories of the securities business as SIPC shall provide by bylaw.

Such term includes revenues earned by a broker or dealer in connection with a transaction in the portfolio margining account of a customer carried as securities accounts pursuant to a portfolio margining program approved by the Commission. Such term does not include revenues received by a broker or dealer in connection with the distribution of shares of a registered open end investment company or unit investment trust or revenues derived by a broker or dealer from the sales of variable annuities, the business of insurance, or transactions in security futures products.

From Section 16(14) of the Act:

The term "Security" means any note, stock, treasury stock, bond, debenture, evidence of indebtedness, any collateral trust certificate, preorganization certificate or subscription, transferable share, voting trust certificate, certificate of deposit, certificate of deposit for a security, or any security future as that term is defined in section 78c(a)(55)(A) of this title, any investment contract or certificate of interest or participation in any profit-sharing agreement or in any oil, gas or mineral royalty or lease (if such investment contract or interest is the subject of a registration statement with the Commission pursuant to the provisions of the Securities Act of 1933 [15 U.S.C. 77a et seq.]), any put, call, straddle, option, or privilege on any security, or group or index of securities (including any interest therein or based on the value thereof), or any put, call, straddle, option, or privilege entered into on a national securities exchange relating to foreign currency, any certificate of interest or participation in, temporary or interim certificate for, receipt for, guarantee of, or warrant or right to subscribe to or purchase or sell any of the foregoing, and any other instrument commonly known as a security. Except as specifically provided above, the term "security" does not include any currency, or any commodity or related contract or futures contract, or any warrant or right to subscribe to or purchase or sell any of the foregoing.

From SIPC Bylaw Article 6 (Assessments): Section 1(f):

The term "gross revenues from the securities business" includes the revenues in the definition of gross revenues from the securities business set forth in the applicable sections of the Act.

Section 3:

For purpose of this article:

- (a) The term "securities in trading accounts" shall mean securities held for sale in the ordinary course of business and not identified as having been held for investment.
- (b) The term "securities in investment accounts" shall mean securities that are clearly identified as having been acquired for investment in accordance with provisions of the Internal Revenue Code applicable to dealers in securities.
- (c) The term "fees and other income from such other categories of the securities business" shall mean all revenue related either directly or indirectly to the securities business except revenue included in Section 16(9)(A)-(L) and revenue specifically excepted in Section 4(c)(3)(C)[item 2c(1), page 2].

Note: If the amount of assessment entered on line 2e of SIPC-7 is greater than 1/2 of 1% of "gross revenues from the securities business" as defined abova, you may submit that calculation along with the SIPC-7 form to SIPC and pay the smaller amount, subject to review by your Examining Authority and by SIPC.

(34-REV 7/10)

Forward Copy ____

(34-REV 7/10

Calculations _ Exceptions:

Disposition of exceptions:

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

General Assessment Payment Form

For the first haif of the fiscal year ending JUNE 30, 2015 (Read carefully the instructions in your Working Copy before completing this Form)

TO BE FILED BY ALL MEMBERS OF THE SECURITIES INVESTOR PROTECTION CORPORATION

1. Name of Member, address, Designated Examining Authority, 1934 Act registration no. and month in which fiscal year ends for purposes of the audit requirement of SEC Rule 17a-5:

*N*orking copy Note: If any of the information shown on the 051721 FINRA DEC mailing label requires correction, please e-mail any corrections to form@sipc.org and so indicate on the form filed. **REID & RUDIGER LLC** 55 BROAD STREET 28TH FLOOR Name and telephone number of person to contact respecting this form. NEW YORK, NY 10004 R MARTE (908) 231-1000 2. A. General assessment payment for the first half of the fiscal year \$ C KLIEN (908)231-10₽ (item 2e from page 2) 1. Less prior year overpayment applied as reflected on SIPC-7 if applicable 3.029 2. Assessment balance due B. Interest computed on late payment (see instruction E) for _____days at 20% per annum 4.797 C. Total assessment and interest due D. PAID WITH THIS FORM: Check enclosed, payable to SIPC 4,797 Total (must be same as C above) 3. Subsidiaries (S) and predecessors (P) included in 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 4.797 and complete. (Name of Corporation, Pertnership or other organization) Dated the 22 day of JANAURY (Authorized Signature) (Title) This form and the assessment payment is due 30 days after the end of the first six months of the fiscal year. Retain the Working Copy of this form for a period of not less than 6 years, the latest 2 years in an easily accessible place. Dates:
Calculation Postmarked Received Reviewed

Documentation ____

DETERMINATION OF "SIPC NET OPERATING REVENUES"

AND GENERAL ASSESSMENT

Amounts for the fiscal period beginning

JANUARY 1, 2015

and ending DECEMBER 31, 2015

| Many No. | | Eliminate cents |
|--|--|-----------------------|
| Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030) | \$ <u>_</u> | |
| Additions: (1) Total revenues from the securities business of subsidiaries (excerpredecessors not included above. | ept foreign subsidiaries) and - | |
| (2) Net loss from principal transactions in securities in trading accounts. | | |
| (3) Net loss from principal transactions in commodities in trading accounts. | | |
| (4) Interest and dividend expense deducted in determining item 2a. | | |
| (5) Net loss from management of or participation in the underwriting or distribution of securities. | | |
| (6) Expenses other than advertising, printing, registration fees and le profit from management of or participation in underwriting or dist | egal fees deducted in determining net ribution of securities. | |
| (7) Net loss from securities in investment accounts. | | |
| Total additions | _ | 0 |
| Deductions: (1) Revenues from the distribution of shares of a registered open end investment trust, from the sale of variable annuities, from the but investment advisory services rendered to registered investment asseparate accounts and from transactions in security futures produces. | siness of insurance, from companies or insurance company | |
| (2) Revenues from commodity transactions. | | |
| (3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions. | | 65,904 |
| (4) Reimbursements for postage in connection with proxy solicitation. | | |
| (5) Net gain from securities in investment accounts. | | |
| (6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from Issuance date. | | 3,196,238 |
| (7) Direct expenses of printing, advertising and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act). | | |
| (8) Other revenue not related either directly or indirectly to the secur (See Instruction C): | ities business. | |
| (Deductions in excess of \$100,000 require documentation) | | |
| (9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income | Line 13, | |
| (ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960) | \$ | |
| Enter the greater of line (i) or (ii) | | 0 |
| Total deductions | | 65,904 |
| 2d. SIPC Net Operating Revenues | \$. | |
| 2e. General Assessment @ .0025 | \$, | 3,130,334 |
| | (| to page 1, line 2.A.) |

SIPC-6 Instructions

This form is to be filed by all members of the Securities Investor Protection Corporation for the first half of each fiscal year, due no later than 30 days after the end of that period. At the end of your fiscal year, you will receive a SIPC-7, General Assessment Reconciliation Form, which will be based upon the total revenue reported in your Securities and Exchange Commission Rule 17a-5 annual audited statement of income. There will be a place on that form to deduct the SIPC-6 assessment paid. Questions pertaining to this form should be directed to SIPC via e-mail at form@sipc.org or by calling 202-371-8300.

- A. For the purposes of this form, the term "SIPC Net Operating Revenues" shall mean gross revenues from the securities business as defined in or pursuant to the applicable sections of the Securities Investor Protection Act of 1970 ("Act") and Article 6 of SIPC's bylaws (see page 4), less item 2c(9) on page 2.
- B. Gross revenues of subsidiaries, except foreign subsidiaries, are required to be included in SIPC Net Operating Revenues on a consolidated basis except for a subsidiary filing separately as explained hereinafter.

If a subsidiary was required to file a Rule 17a-5 annual audited statement of income separately and is also a SIPC member, then such subsidiary must itself file SIPC-6, pay the assessment, and should not be consolidated in your SIPC-6.

SIPC Net Operating Revenues of a predecessor member which are not included in item 2a, were not reported separately and the SIPC assessments were not paid thereon by such predecessor, shall be included in item 2b(1).

- C. Your General Assessment should be computed as follows:
- (1) <u>Line 2a</u> For the fiscal period enter total revenue based upon amounts reported in your Rule 17a-5 Annual Audited Statement of Income prepared in conformity with generally accepted accounting principles applicable to securities brokers and dealers, or if exempted from that rule, use X-17A-5 (FOCUS Report) Line 12, Code 4030.
- (2) Adjustments The purpose of the adjustments on page 2 is to determine SIPC Net Operating Revenues.
 - (a) Additions Lines 2b(1) through 2b(7) assure that assessable income and gain items of SIPC Net Operating Revenues are totaled, unreduced by any losses (e.g., if a net loss was incurred for the period from all transactions in trading account securities, that net loss does not reduce other assessable revenues). Thus, line 2b(4) would include all short dividend and interest payments including those incurred in reverse conversion accounts, rebates on stock loan positions and repo interest which have been netted in determining line 2(a).
 - (b) <u>Deductions</u>. Line 2c(1) through line 2c(9) are either provided for in the statute, as in deduction 2c(1), or are allowed to arrive at an assessment base consisting of net operating revenues from the securities business. For example, line 2c(9) allows for a deduction of either the total interest and dividend expense (not to exceed interest and dividend income), as reported on FOCUS line 22/PART 11A Line 13 (Code 4075), plus line 2b(4) or 40% of interest earned on customers' securities accounts (40% of FOCUS Line 5 Code 3960). Be certain to complete both line (i) and (ii), entering the greater of the two in the far right column. Dividends paid to shareholders are not considered "Expense" and thus are not to be included in the deduction. Likewise, interest and dividends paid to partners pursuant to

partnership agreements would also not be deducted.

If the amount reported on line 2c (8) aggregates to \$100,000 or greater, supporting documentation must accompany the form that identifies these deductions. Examples of support information include; contractual agreements, prospectuses, and limited partnership documentation.

- (i) Determine your SIPC Net Operating Revenues, item 2d, by adding to item 2a, the total of item 2b, and deducting the total of item 2c.
- (ii) Multiply the SIPC Net Operating Revenues by the applicable rate. Enter the resulting amount in item 2e and on line 2A of page 1.
- (iii) Enter interest computed on late payment (if applicable) on line 2B.
- (iv) Enter the total due on line 2C and the payment of the amount due on line 2D.

D. Any SIPC member which is also a bank (as defined in the Securities Exchange Act of 1934) may exclude from SIPC Net Operating Revenues dividends and interest received on securities in its investment accounts to the extent that it can demonstrate to SIPC's satisfaction that such securities are held, and such dividends and interest are received, solely in connection with its operations as a bank and not in connection with its operations as a broker, dealer or member of a national securities exchange. Any member who excludes from SIPC Net Operating Revenues any dividends or interest pursuant to the preceding sentence shall file with this form a supplementary statement setting forth the amount so excluded and proof of its entitlement to such exclusion.

E. <u>Interest on Assessments</u>. If all or any part of an assessment payable under Section 4 of the Act has not been postmarked within 15 days after the due date thereof, the member shall pay, in addition to the amount of the assessment, interest at the rate of 20% per annum on the unpaid portion of the assessment for each day it has been overdue.

Mail this completed form to SIPC together with a check for the amount due, made payable to SIPC, using the enclosed return PO BOX envelope or wire the payment to:

Bank Name: Citibank, New York

Swift: CITIUS33 ABA#: 021000089

Account Number: 30801482

Address: 111 Wall Street, New York, New York 10043 USA On the wire identify the name of the firm and its SEC Registration 8-# and label it as "for assessment." Please fax a copy of the assessment form to (202)-371-6728 or e-mail a copy to form@sipc.org on the same day as the wire.

From Section 16(9) of the Act:

The term "gross revenues from the securities business" means the sum of (but without duplication)—

- (A) commissions earned in connection with transactions in securities effected for customers as agent (net of commissions paid to other brokers and dealers in connection with such transactions) and markups with respect to purchases or sales of securities as principal;
- (B) charges for executing or clearing transactions in securities for other brokers and dealers;
- (C) the net realized gain, if any, from principal transactions in securities in trading accounts;
- (D) the net profit, if any, from the management of or participation in the underwriting or distribution of securities:
- (E) interest earned on customers' securities accounts;
- (F) fees for investment advisory services (except when rendered to one or more registered investment companies or insurance company separate accounts) or account supervision with respect to securities;
- (G) fees for the solicitation of proxies with respect to, or tenders or exchanges of, securities;
- (H) income from service charges or other surcharges with respect to securities;
- (I) except as otherwise provided by rule of the Commission, dividends and interest received on securities in investment accounts of the broker or dealer;
- (J) fees in connection with put, call, and other options transactions in securities;
- (K) commissions earned for transactions in (i) certificates of deposit, and (ii) Treasury bills, bankers acceptances, or commercial paper which have a maturity at the time of issuance of not exceeding nine months, exclusive of days of grace, or any renewal thereof, the maturity of which is likewise limited, except that SIPC shall by bylaw include in the aggregate of gross revenues only an appropriate percentage of such commissions based on SIPC's loss experience with respect to such instruments over at least the preceding five years; and
- (L) fees and other income from such other categories of the securities business as SIPC shall provide by bylaw.

Such term includes revenues earned by a broker or dealer in connection with a transaction in the portfolio margining account of a customer carried as securities accounts pursuant to a portfolio margining program approved by the Commission. Such term does not include revenues received by a broker or dealer in connection with the distribution of shares of a registered open end investment company or unit investment trust or revenues derived by a broker or dealer from the sales of variable annuities, the business of insurance, or transactions in security futures products.

From Section 16(14) of the Act:

The term "Security" means any note, stock, treasury stock, bond, debenture, evidence of indebtedness, any collateral trust certificate, preorganization certificate or subscription, transferable share, voting trust certificate, certificate of deposit, certificate of deposit for a security, or any security future as that term is defined in section 78c(a)(55)(A) of this title, any investment contract or certificate of interest or participation in any profit-sharing agreement or in any oil, gas or mineral royalty or lease (if such investment contract or interest is the subject of a registration statement with the Commission pursuant to the provisions of the Securities Act of 1933 [15 U.S.C. 77a et seq.]), any put, call, straddle, option, or privilege on any security, or group or index of securities (including any Interest therein or based on the value thereof), or any put, call, straddle, option, or privilege entered into on a national securities exchange relating to foreign currency, any certificate of Interest or participation in, temporary or interim certificate for, receipt for, guarantee of, or warrant or right to subscribe to or purchase or sell any of the foregoing, and any other instrument commonly known as a security. Except as specifically provided above, the term "security" does not include any currency, or any commodity or related contract or futures contract, or any warrant or right to subscribe to or purchase or sell any of the foregoing.

From SIPC Bylaw Article 6 (Assessments): Section 1(f):

The term "gross revenues from the securities business" includes the revenues in the definition of gross revenues from the securities business set forth in the applicable sections of the Act.

Section 3:

For purpose of this article:

- (a) The term "securities in trading accounts" shall mean securities held for sale in the ordinary course of business and not identified as having been held for investment.
- (b) The term "securities in investment accounts" shall mean securities that are clearly identified as having been acquired for investment in accordance with provisions of the Internal Revenue Code applicable to dealers in securities.
- (c) The term "fees and other income from such other categories of the securities business" shall mean all revenue related either directly or indirectly to the securities business except revenue included in Section 16(9)(A)-(L) and revenue specifically excepted in Section 4(c)(3)(C)[Item 2c(1), page 2].

Note: If the amount of assessment entered on line 2e of SIPC-6 is greater than 1/2 of 1% of "gross revenues from the securities business" as defined above, you may submit that calculation along with the SIPC-6 form to SIPC and pay the smaller amount, subject to review by your Examining Authority and by SIPC.

SIPC Examining Authorities:

SEC
Mail Processing
Section
MAR 142016
Washington DC
416

Reid & Rudiger, L.L.C.

(SEC I.D. No. 8-51721)

FINANCIAL STATEMENTS AND

SUPPLEMENTAL SCHEDULE

FOR THE YEAR ENDED DECEMBER 31, 2015

AND

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM