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REPORT FOR THE PERIOD BEGINNING 01/0	1/15	AND ENDING 12/31/	15')
	MM/DD/YY		MHTD/YY
. A. REGIST	RANT IDENTIFICAT	TION	
NAME OF BROKER-DEALER: Triton Pacific	Capital LLC	Γ	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE OF BUSINES			
11900 W. Olympic Blvd., Suite 720	SS: (Do not use P.O. Box P	(0.)	FIRM I.D. NO.
Troop VI. Olympic Divd., Olite 720	(No. and Street)		
Los Angeles	CA	900	64
(City)	(State)	(Zip Co	de)
NAME AND TELEPHONE NUMBER OF PERSC	IN TO CONTACT IN REG.		42-1380
			Code – Telephone Number)
B. ACCOUI	NTANT IDENTIFICA	ΓΙΟΝ	
INDEPENDENT PUBLIC ACCOUNTANT whose	opinion is contained in thi	s Report*	
Joseph Yafeh, CPA			
(Nam	e – if individual, state last, first, r	niddle name)	
11300 W. Olympic Blvd., Suite 875	Los Angeles	CA	90064
(Address)	(City)	SECURITIES AND EXCHANG	1986
CHECK ONE:		RECEIVED	
Certified Public Accountant		DEC 122017	
Public Accountant	Public Accountant DIVISION OF TRADING & MARKETS		MARKETS
Accountant not resident in United St	lates or any of its possessio	ns.	
For	OFFICIAL USE ONLY	1	
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*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

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OATH OR AFFIRMATION

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1,	I, Robert Davis	, swear (or affirm) that, to the best of
	my knowledge and belief the accompanying financi Triton Pacific Capital, LLC	al statement and supporting schedules pertaining to the firm of
of	of December 31	, 20 <u>15</u> , are true and correct. I further swear (or affirm) that
nei	neither the company nor any partner, proprietor, pr	incipal officer or director has any proprietary interest in any account
cla	classified solely as that of a customer, except as fol	lows:
N	None	
-005/002	***************************************	
<	A	Signature CEO Title
M M M	 (b) Statement of Financial Condition. (c) Statement of Income (Loss). 	Nr Comm Ets. Jan 16, 2019 T
Ø	(d) Statement of Changes in Financial Condition	
	 (e) Statement of Changes in Stockholders' Equ (f) Statement of Changes in Liabilities Subord 	inty or Partners' or Sole Proprietors' Capital.
		mated to claims of creators.
Ø	(h) Computation for Determination of Reserve	
	(i) Information Relating to the Possession or C	
	W	lanation of the Computation of Net Capital Under Rule 15c3-1 and the rve Requirements Under Exhibit A of Rule 15c3-3.
		maudited Statements of Financial Condition with respect to methods of
	consolidation.	•
		es found to exist or found to have existed since the date of the previous audit.
	- fall arrelations with any manerial manedation	
**	**For conditions of confidential treatment of certain	in portions of this filing, see section 240.17a-5(e)(3).

Joseph Yafeh CPA, Inc. A Professional Accounting Corporation PCAOB Registered # 3346 11300 W. Olympic Blvd., Suite 875 Los Angeles CA 90064 310-477-8150 ~ Fax 310-477-8152

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM AUDITOR'S STANDARD REPORT

To the Board of Directors and Members of Triton Pacific Capital, LLC

I have audited the accompanying statement of financial condition of Triton Pacific Capital, LLC as of December 31, 2015, and the related statements of income, changes in members' equity, changes in liabilities subordinated to claims of general creditors, and cash flows for the year then ended. These financial statements are the responsibility of Triton Pacific Capital, LLC's management. My responsibility is to express an opinion on these financial statements based on my audit.

I conducted my audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that I 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. I believe that my audit provides a reasonable basis for my opinion.

In my opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Triton Pacific Capital, 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.

The Computation of Net Capital Under Rule 15c3-1, Computation of Determination of Reserve Requirements Under Rule 15c3-3, Information for Possession or Control Requirements Under Rule 15c3-3, and SIPC Form 7 has been subjected to audit procedures performed in conjunction with the audit of Triton Pacific Capital, LLC's financial statements. The supplemental information is the responsibility of Triton Pacific Capital, LLC's management. My 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 my opinion on the supplemental information, I evaluated whether the supplemental information, including its form and content, is presented in conformity with 17 C.F.R. §240.17a-5. In my opinion, the Computation of Net Capital Under Rule 15c3-1, Computation of Determination of Reserve Requirements Under Rule 15c3-3, Information for Possession or Control Requirements Under Rule 15c3-3, and SIPC Form 7 is fairly stated, in all material respects, in relation to the financial statements as a whole.

Los Angeles, CA February 26, 2016

Triton Pacific Capital, LLC Statement of Financial Condition As of December 31, 2015

Assets

Cash and cash equivalents	\$ 1,396,681
Securities	2,601,729
Placement fee receivable	9,044,940
Other assets and deposits	300
Prepaid expenses	14,439
Furniture, fixtures and equipment	26,532
Security deposit – rent	99,420
Total Assets	<u>\$13,184,041</u>

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Liabilities and Member's Equity

Liabilities Accrued expenses	<u>\$ 12,586</u>
Total Liabilities	<u>\$ 12,586</u>
Member's Equity	13,171,455
Total Liabilities and Member's Equity	<u>\$13,184,041</u>

See accompanying notes to the financial statements.

Note 1 - Organization and Nature of Business

Triton Pacific Capital, LLC (the "Company" or "TPC"), was organized in the State of California on February 28, 1996 as a Limited Liability Company operating as a registered broker-dealer in securities under the Securities and Exchange Act of 1934. The Company conducts business on a fully disclosed basis. The Company does not hold customer funds and/or securities and is a member of the National Association of Securities Dealers, Inc. ("NASD") and Securities Investors Protection Corporation ("SIPC"). The NASD and NYSE Member Regulation consolidated in 2007 to form the Financial Industry Regulatory Agency ("FINRA").

The Company provides capital raising services to its clients.

Note 2 -- Significant Accounting Policies

Basis of Presentation – The Company conducts business on a fully disclosed basis. The Company does not hold customer funds and/or securities. The Company currently conducts one type of business as a securities broker-dealer and that involves the marketing of private placements.

Under its membership agreement with FINRA and pursuant to Rule 15c3 (k) (2) (i), the Company conducts business on a fully disclosed basis and does not execute or clear securities transactions for customers. Accordingly, the Company is exempt from the requirement of Rule 15c3-3 under the Securities Exchange Act of 1934 pertaining to the possession or control of customer assets and reserve requirements.

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 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.

Income Taxes – The Company, with consent of its Member, has elected to be a California Limited Liability Company. For tax purposes the Company is treated like a partnership, therefore in lieu of business income taxes, the Member is taxed on the Company's taxable income. Therefore, no provision or liability for Federal Income Taxes is included in these financial statements.

The accounting principles generally accepted in the United States of America provides accounting and disclosure guidance about positions taken by an organization in its tax returns that might be uncertain. Management has considered its tax positions and believes that all of the positions taken by the Company in its Federal and State organization tax returns are more likely than not to be sustained upon examination. The Company is subject to examinations by U.S. Federal and State tax authorities from 2011 to the present, generally for three years after they are filed.

Note 2 -- Significant Accounting Policies (continued)

Revenue Recognition - The company is engaged by its clients to assist them in raising capital from institutional investors. The institutional investors make the unilateral decision to invest capital. All of the company's capital raising engagements are private placements (Reg. D) exempt. The company earns its fees upon the closing of a legally binding agreement by an institutional investor to invest in an investment vehicle sponsored by one of the company's client. The company is paid its fees over time.

Depreciation – Depreciation is provided on a straight-line basis using estimated useful lives of five to ten years. Leasehold improvements are amortized over the lesser of the economic useful life of the improvement or the term of the lease.

Statement of Changes in Financial Condition – The Company has defined cash equivalents as highly liquid investments, with original maturities of less than three months that are not held for sale in the ordinary course of business.

Note 3 - Fair Value

FASB ASC 820 defines fair value, establishes a framework for measuring fair value, and establishes a fair value hierarchy which prioritizes the inputs to valuation techniques. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. A fair value measurement assumes that the transaction to sell the asset or transfer the liability occurs in the principal market for the asset or liability or, in the absence of a principal market, the most advantageous market. Valuation techniques that are consistent with the market, income or cost approach, as specified by FASB ASC 820, are used to measure fair value.

The fair value hierarchy prioritizes the inputs to valuation techniques used to measure fair value into three broad levels:

- Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities the Company has the ability to access.
- Level 2 inputs are inputs (other than quoted prices included within level 1) that are observable for the asset or liability, either directly or indirectly.
- Level 3 inputs are unobservable inputs for the asset or liability and rely on management's own assumptions about the assumptions that market participants would use in pricing the asset or liability. (The unobservable inputs should be developed based on the best information available in the circumstances and may include the Company's own data.)

Note 3 - Fair Value (continued)

The following table presents the Company's fair value hierarchy for those assets and liabilities measured at fair value on a recurring basis as of December 31, 2015

Fair Value Measurements on a Recurring Basis As of December 31, 2015

Assets	Level 1	Level 2	Level 3	<u>Total</u>
Cash	\$1,396,681	-	-	\$1,396,681
Securities	-	-	\$2,601,729	\$2,601,729

Note 4 – Net Capital Requirements

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (SEC rule 5c3-1) 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. Net capital and aggregate indebtedness change day by day, but on December 31, 2015, the Company had net capital of \$ 3,643,186 which was \$ 3,638,186 in excess of its required net capital requirement of \$5,000. The Company's percentage of aggregate indebtedness, \$ 12,586 to net capital was 0.3%.

Note 5 – Income Taxes

For the year ended December 31, 2015, the Company recorded gross receipts tax of \$6,000.

Note 6 – Commitments and Contingencies

The Company extended its lease agreement for its Los Angeles office space under a non-cancelable lease which commenced July 1, 2015 and expires June 30, 2016. The Company extended its lease agreement for its New York office under a non-cancelable lease which commenced January 1, 2016.

The future minimum lease expenses are:

2016	191,863
2017	173,331

Note 7 – Exemption from the SEC Rule 15c3-3

The Company holds no customer accounts, cash or any financial assets on behalf of any clients and does not do any clearing of any transactions on behalf of any clients and thus qualifies for Rule 15c3-3(k)(2)(i) which provides an exemption from the SEC's so-called "customer protection rule" for firms that: carry no margin accounts; promptly transmit all customer funds and deliver all securities received in connection with their broker-dealer activities; do not otherwise hold funds or securities for, or owe money or securities to, customers; and effectuate all financial transactions with customers through one or more bank accounts designated as "Special Account for the Exclusive Benefit of Customers" of the Company.

Note 8 – Subsequent Events

Management has reviewed the results of operations for the period of time from its year end December 31, 2015 through February 26, 2016, the date the financial statements were available to be issued, and has determined that no adjustments are necessary to the amounts reported in the accompanying combined financial statements nor have any subsequent events occurred, the nature of which would require disclosure.

Joseph Yafeh CPA, Inc. A Professional Accounting Corporation PCAOB Registered # 3346 11300 W. Olympic Blvd., Suite 875 Los Angeles CA 90064 310-477-8150 ~ Fax 310-477-8152

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM EXEMPTION REPORT REVIEW

To the Board of Directors and Members of Triton Pacific Capital, LLC

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

My 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 Triton Pacific Capital, 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, I do not express such an opinion.

Based on my review, I am 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.

Los Angeles, CA February 26, 2016



January 25, 2016

Joseph Yafeh, CPA 11300 W. Olympic Blvd, Suite 875 Los Angeles, CA 90064

Re: SEC Rule 17a-5(d) (4) Exemption Report

Dear Mr. Yafeh:

Pursuant to the referenced rule, the following information is provided.

Under its membership agreement with FINRA and pursuant to Rule 15c3-3(k)(2)(i), the Company conducts business on a fully disclosed basis and does not execute or clear securities transactions for customers.

Triton Pacific Capital, LLC_met the Section 240.15c3-3(k)(2)(i) exemption for the period January 1, 2015 through December 31, 2015.

Sincerely, Robert E. Davis, Jr. CEO

Standard Investment Chartered, Inc.			
	RECEIVED		
February 28, 2017	2017 OCT 24 PH 3: 02	SEC MAIL PROCESSING Received	
Breard & Associates, Inc.	SEC / TM	OCT 232017	
Certified Public Accountants 9221 Corbin Avenue, Suite 170 Northridge, CA 91324		WASH, D.C.	

Dear Mr. Breard.

We are providing this letter in connection with your audit of the statement of financial condition and the related statements of income, changes in stockholders' equity, and cash flows of Standard Investment Chartered, Inc. (the Company) as of December 31, 2016, and for the year then ended, for the purpose of expressing an opinion as to whether the financial statements present fairly, in all material respects, the financial position, results of operations, and cash flows of the Company in conformity with accounting principles generally accepted in the United States of America. We confirm that we are responsible for the fair presentation in the financial statements of financial condition, results of operations, and cash flows in conformity with generally accepted accounting principles. We also recognize that we are responsible for establishing and maintaining effective internal control.

Certain representations in this letter are described as being limited to matters that are material. Items are considered material, regardless of size, if they involve an omission or misstatement of accounting information that, in the light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement.

We confirm, to the best of our knowledge and belief as of February 28, 2017, the following representations made to you during your audit.

- The financial statements referred to above are fairly presented in conformity with accounting principles generally accepted in the United States of America and include all disclosures necessary for such fair presentation otherwise required to be included by the laws and regulations to which the Company is subject.
- We have made available to you all of the following:
 - Financial records and related data.
 - Minutes of the meetings of stockholders, directors, and committees of directors, or summaries of actions of recent meetings for which minutes have not yet been prepared. The most recent meetings held were: September 12, 2016
- There have been no regulatory examination reports, supervising correspondence, and similar materials from applicable regulatory agencies (particularly communications concerning supervisory actions or noncompliance with, or deficiencies in, rules, regulations, or supervisory actions).
- There are no material transactions that have not been properly recorded in the accounting

⁴⁵⁰ Newport Center Drive, Suite 590, Newport Beach, CA 92660 714-444-4300 standardinvestment.com Member FINRA (finra.org) / SIPC (sipc.org) Page 1

records underlying the financial statements.

- We believe that the effects of the uncorrected misstatements summarized in the accompanying schedule are immaterial, both individually and in the aggregate, to the financial statements taken as a whole.
- We acknowledge our responsibility for the design and implementation of programs and controls to prevent and detect fraud.
- We have no knowledge of any fraud or suspected fraud affecting the Company involving
 - management,
 - employees who have significant roles in internal control, or
 - others where the fraud could have a material effect on the financial statements.
- We have no knowledge of any allegations of fraud or suspected fraud affecting the Company received in communications from employees, former employees, analysts, regulators, short sellers, or others.
- The Company has no plans or intentions that may materially affect the carrying value or classification of assets and liabilities.
- The following have been properly recorded or disclosed in the financial statement
 - Related-party transactions, including sales, purchases, loans, transfers, leasing arrangements, and guarantees, and amounts receivable from or payable to related parties.
 - Guarantees, whether written or oral, under which the Company is contingently liable.
 - Significant estimates and material concentrations known to management that are required to be disclosed in accordance with Financial Accounting Standards Board (FASB) Accounting Standards Codification (ASC) 275, Risks and Uncertainties.
 - Arrangements with financial institutions involving compensating balance arrangements involving restrictions on cash balances and lines of credit, or similar arrangements.
 - The following information about financial instruments with off-balance-sheet risk and financial instruments [including receivables] with concentrations of credit risk:
 - The extent, nature, and terms of financial instruments with off-balance-sheet risk
 - The amount of credit risk of financial instruments with off-balance-sheet risk and information about the collateral supporting such financial instruments
 - Significant concentrations of credit risk arising from all financial instruments and information about the collateral supporting such financial instruments

- Agreements to repurchase assets previously sold or resell assets previously purchased.
- There are no
 - violations or possible violations of laws or regulations whose effects should be considered for disclosure in the financial statements or as a basis for recording a loss contingency.
 - unasserted claims or assessments that our lawyer has advised us are probable of assertion and must be disclosed in accordance with FASB ASC 450, *Contingencies*.
 - other liabilities or gain or loss contingencies that are required to be accrued or disclosed by FASB ASC 450.
- The Company has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral, except as disclosed in the financial statements.
- The Company has complied with all aspects of contractual agreements that would have a material effect on the financial statements in the event of noncompliance.
- Customers' debit balances, brokers' debit balances, and other accounts receivable are valid receivables. In our opinion, an adequate reserve has been established to cover any losses that may be incurred upon collection.
- Provision has been made for any material loss to be sustained in the fulfillment of or from the inability to fulfill any purchase or sales commitments.
- There are no securities or investments not readily marketable owned by the Company or borrowed under subordination agreements except as disclosed in the financial statements or notes thereto or as follows.

It is understood that the term "securities and investments not readily marketable" includes but is not limited to the following:

- Securities for which there is no market on a securities exchange or independent publicly quoted market
- Securities that cannot be publicly offered or sold unless registration has been effected under the Securities Act of 1933 (or the conditions of an exemption such as Regulation A under Section 3(B) of such act have been complied with), that is, restricted stock
- Securities and investments that cannot be offered or sold because of other arrangements, restrictions, or conditions applicable to the securities and investments or to the Company (that is, control stock)
- The methods and significant assumptions used to determine fair values of financial instruments, including derivative product transactions, are as follows: fair value measurement

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was determined based on the assumptions that market participants would use in pricing its assets and/or liabilities. As a basis for considering market participant assumptions in fair value measurements, the Company uses a fair value hierarchy that distinguishes between (1) market participant assumptions developed based on market data obtained from sources independent of the reporting entity (observable inputs) and (2) the Company's own assumptions about market participant assumptions developed based on the best information available in the circumstances (unobservable inputs).

- In addition, the Company at December 31, 2016, had
 - recorded all securities exchange memberships on the books.
 - properly recorded all participation in joint accounts carried by others.
 - no material unrecorded assets or contingent assets, such as claims relating to buy-ins, unfulfilled contracts, and so forth, whose value depends on the fulfillment of conditions regarded as uncertain.
 - no open contractual commitments other than those appearing on the memo books and records; for example, when-distributed and delayed delivery contracts, underwritings and when-issued contracts, endorsements of puts and calls, and commitments in foreign currencies and spot (cash) commodity contracts.
 - established a reserve for dividends and transfer items and security differences that is adequate to cover any anticipated losses in connection with the short securities that may have to be covered or claims arising from the liquidation of long securities.
 - no borrowings or claims unconditionally subordinated to all claims or general creditors pursuant to a written agreement except as disclosed in the financial statements or notes thereto.
- All liabilities subordinated to the claims of general creditors are covered by satisfactory subordination agreements under 17 CFR 240.15c3-1 (The Net Capital Rule) and approved by the Financial Industry Regulatory Authority.
- In accordance with FASB ASC 820, *Fair Value Measurement*, the Company has categorized its financial instruments, based on the priority of inputs to the valuation technique, into a three-level fair value hierarchy. The fair value gives the highest priority to quoted prices in active markets for identical assets or liabilities (level 1) and the lowest priority to unobservable inputs (level 3). If the inputs used to measure the financial instruments fall within different levels of the hierarchy, the categorization is based on the lowest level input that is significant to the fair value measurement of the instrument.
- The Company has assessed the impact of FASB ASC 740, *Income Taxes*, and has determined that no material liability is required to be recorded.
- Note X to the financial statements discloses all of the facts (meaning, significant conditions and events and management plans) of which we are aware that are relevant to the Company's ability to continue as a going concern.

- Risks associated with concentrations, based on information known to management, that meet all of the following criteria have been disclosed in the financial statements:
 - The concentration exists at the date of the financial statements.
 - The concentration makes the enterprise vulnerable to the risk of a near-term severe impact.
 - It is at least reasonably possible that the events that could cause the severe impact will occur in the near term.
- There are no capital withdrawals anticipated within the next six months other than as disclosed in the financial statements or notes thereto except as follows: None.
- We are responsible for establishing and maintaining adequate internal control for safeguarding customer and the Company's securities and for the practices and procedures relevant to the objectives stated in Rule 17a-5(g), including making the periodic computations of aggregated indebtedness (or aggregate debits) and net capital under Rule 17a-3(a)(11) and for maintaining compliance with the exemptive provisions of Rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we do not maintain practices and procedures related to the following:
 - Making quarterly securities examinations, counts, verifications, and comparisons, and recordation of differences required by Rule 17a-13.
 - Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System.

We believe that our practices and procedures as described above were adequate at December 31, 2016 to meet the SEC's objectives.

There have been no significant changes in internal control since December 31, 2016.

- There are no significant deficiencies or material weaknesses or material inadequacies at December 31, 2016, or during the period January 1, 2017, to the date of the auditor's report, in internal control over financial reporting and control activities for safeguarding securities, and the practices and procedures followed in
 - making the periodic computations of aggregate indebtedness (or aggregate debits) and net capital as defined in accordance with the Net Capital Rule and the customer reserve computations required by paragraph (e) of 17 CFR 240.15c3-3(e) (The Customer Protection Rule).
 - making the quarterly securities examinations, counts, verifications and comparisons, and the recordation of differences required by 17 CFR 240.17a-13.
 - complying with the requirement for prompt payment for securities under Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System.
 - obtaining and maintaining physical possession or control of all fully paid and excess-

margin securities of customers as required by The Customer Protection Rule.

- making periodic computations of the minimum financial requirements pursuant to Regulation 1.17 of the Commodity Exchange Act.
- making daily computations of the segregation requirements of Section 4d(2) (and Regulation 30) of the Commodity Exchange Act and the regulations thereunder, and the segregation of funds based upon such computations.
- The Company is not subject to and did not prepare a calculation for the reserve requirements of Rule 15c3-3 in accordance with applicable regulation.
- There was no computation of segregation requirements under the Commodity Exchange Act that indicated an insufficiency in segregation during the period from January 1, 2017 through the date of the auditor's report.
- The Company has appropriately reconciled its books and records (for example, general ledger accounts) underlying the financial statements to their related supporting information (for example, sub ledger or third-party data). All related reconciling items considered to be material were identified and included on the reconciliations and were appropriately adjusted in the financial statements. There were no material unreconciled differences or general ledger suspense account items that should have been adjusted or reclassified to another account. All intracompany accounts have been eliminated or appropriately measured and considered for disclosure in the financial statements.
- Foreign and domestic operating subsidiaries of the Company which are subject to local securities and capital adequacy requirements were in compliance with such regulations and requirements at December 31, 2016, and for the year then ended.
- All borrowings and financial obligations of the Company of which we are aware are included in the financial statements at December 31, 2016, as appropriate. We have fully disclosed to you all borrowing arrangements of which we are aware.
- There are no outstanding past due PCAOB accounting support fees.
- As it related to supplementary information included in the financial statements,
 - the Company acknowledges and understands its responsibility for the presentation of the supplementary information in accordance with Rule 17a-5 of the Securities Exchange Act of 1934.
 - the supplementary information, including its form and content, is fairly presented in accordance with Rule 17a-5 of the Securities Exchange Act of 1934.
 - the methods of measurement or presentation have not changed from those used in the prior period.
 - there were no significant assumptions or interpretations underlying the [measurement or] presentation of the supplementary information.

• the Company will make the audited financial statements readily available to the intended users of the schedule no later than the issuance date by the entity of the supplementary information and the auditor's report thereon.

To the best of our knowledge and belief, no events have occurred subsequent to the statement of financial condition date and through the date of this letter that would require adjustment to or disclosure in the aforementioned financial statements.

Best Regards,

d.

6 Sean Lawson

Chief Compliance Officer