

SUN'S BROTHERS SECURITIES, INC.

SUN'S BROTHERS SECURITIES, INC.

FINANCIAL STATEMENTS AND  
REPORT OF INDEPENDENT REGISTERED  
PUBLIC ACCOUNTING FIRM  
PURSUANT TO RULE 17a-5

SEPTEMBER 30, 2023

CONFIDENTIAL

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

ANNUAL REPORTS  
FORM X-17A-5  
PART III

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Information Required Pursuant to Rules 17a-5, 17a-12, and 18a-7 under the Securities Exchange Act of 1934

FILING FOR THE PERIOD BEGINNING 10/01/2022 AND ENDING 09/30/2023  
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF FIRM: SUN'S BROTHERS SECURITIES INC.

TYPE OF REGISTRANT (check all applicable boxes):

- ☒ Broker-dealer ☐ Security-based swap dealer ☐ Major security-based swap participant  
☐ Check here if respondent is also an OTC derivatives dealer

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use a P.O. box no.)

6770 HAWAII KAI DRIVE #209

(No. and Street)

HONOLULU

HI

96825

(City)

(State)

(Zip Code)

PERSON TO CONTACT WITH REGARD TO THIS FILING

MINWON YANG

808-538-0590

SBS@HAWAII.RR.COM

(Name)

(Area Code - Telephone Number)

(Email Address)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose reports are contained in this filing\*

OHAB AND COMPANY, PA

(Name - if individual, state last, first, and middle name)

100 E SYBELIA AVENUE SUITE 130

MAITLAND

FL

32751

(Address)

(City)

(State)

(Zip Code)

JULY 28, 2004

1839

(Date of Registration with PCAOB)(if applicable)

(PCAOB Registration Number, if applicable)

FOR OFFICIAL USE ONLY

\* Claims for exemption from the requirement that the annual reports be covered by the reports of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis of the exemption. See 17 CFR 240.17a-5(e)(1)(ii), if applicable.

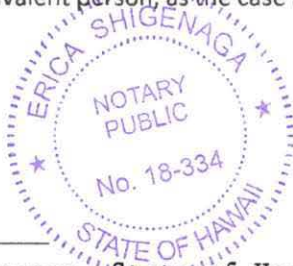
Persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

# OATH OR AFFIRMATION

I, MINWOND YANG, swear (or affirm) that, to the best of my knowledge and belief, the financial report pertaining to the firm of SUN'S BROTHERS SECURITIES, INC., as of 9/30, 2023, is true and correct. I further swear (or affirm) that neither the company nor any partner, officer, director, or equivalent person, as the case may be, has any proprietary interest in any account classified solely as that of a customer.



Notary Public, Erica Shigenaga, State of Hawaii



Signature:

Title:

PRESIDENT

## This filing\*\* contains (check all applicable boxes):

- ☒ (a) Statement of financial condition.
- ☐ (b) Notes to consolidated statement of financial condition.
- ☒ (c) Statement of income (loss) or, if there is other comprehensive income in the period(s) presented, a statement of comprehensive income (as defined in § 210.1-02 of Regulation S-X).
- ☒ (d) Statement of cash flows.
- ☒ (e) Statement of changes in stockholders' or partners' or sole proprietor's equity.
- ☐ (f) Statement of changes in liabilities subordinated to claims of creditors.
- ☒ (g) Notes to consolidated financial statements.
- ☒ (h) Computation of net capital under 17 CFR 240.15c3-1 or 17 CFR 240.18a-1, as applicable.
- ☐ (i) Computation of tangible net worth under 17 CFR 240.18a-2.
- ☒ (j) Computation for determination of customer reserve requirements pursuant to Exhibit A to 17 CFR 240.15c3-3.
- ☐ (k) Computation for determination of security-based swap reserve requirements pursuant to Exhibit B to 17 CFR 240.15c3-3 or Exhibit A to 17 CFR 240.18a-4, as applicable.
- ☐ (l) Computation for Determination of PAB Requirements under Exhibit A to § 240.15c3-3.
- ☒ (m) Information relating to possession or control requirements for customers under 17 CFR 240.15c3-3.
- ☐ (n) Information relating to possession or control requirements for security-based swap customers under 17 CFR 240.15c3-3(p)(2) or 17 CFR 240.18a-4, as applicable.
- ☒ (o) Reconciliations, including appropriate explanations, of the FOCUS Report with computation of net capital or tangible net worth under 17 CFR 240.15c3-1, 17 CFR 240.18a-1, or 17 CFR 240.18a-2, as applicable, and the reserve requirements under 17 CFR 240.15c3-3 or 17 CFR 240.18a-4, as applicable, if material differences exist, or a statement that no material differences exist.
- ☐ (p) Summary of financial data for subsidiaries not consolidated in the statement of financial condition.
- ☒ (q) Oath or affirmation in accordance with 17 CFR 240.17a-5, 17 CFR 240.17a-12, or 17 CFR 240.18a-7, as applicable.
- ☐ (r) Compliance report in accordance with 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
- ☒ (s) Exemption report in accordance with 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
- ☐ (t) Independent public accountant's report based on an examination of the statement of financial condition.
- ☒ (u) Independent public accountant's report based on an examination of the financial report or financial statements under 17 CFR 240.17a-5, 17 CFR 240.18a-7, or 17 CFR 240.17a-12, as applicable.
- ☐ (v) Independent public accountant's report based on an examination of certain statements in the compliance report under 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
- ☒ (w) Independent public accountant's report based on a review of the exemption report under 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
- ☐ (x) Supplemental reports on applying agreed-upon procedures, in accordance with 17 CFR 240.15c3-1e or 17 CFR 240.17a-12, as applicable.
- ☐ (y) Report describing any material inadequacies found to exist or found to have existed since the date of the previous audit, or a statement that no material inadequacies exist, under 17 CFR 240.17a-12(k).
- ☐ (z) Other: \_\_\_\_\_

\*\*To request confidential treatment of certain portions of this filing, see 17 CFR 240.17a-5(e)(3) or 17 CFR 240.18a-7(d)(2), as applicable.

( See attached notary certificate)

STATE OF HAWAII, } ss:  
City and County of Honolulu }

Subscribed and sworn to before me this 16th day of January, 2024.



Erica Shigenaga  
Notary Public, State of Hawaii  
My Commission Expires: 06/24/2026

**Notary Certificate:**

Doc. Date: 01/16/2024 # Pages: 2  
Notary Name: Erica Shigenaga First Circuit  
Document description:  
Annual Reports Form X-17A-5 Part III



Erica Shigenaga  
Notary Signature

1/16/2024  
Date

**SUN'S BROTHERS SECURITIES, INC.**

**C O N T E N T S**

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

FINANCIAL STATEMENTS

STATEMENT OF FINANCIAL CONDITION

STATEMENT OF OPERATIONS

STATEMENT OF CHANGES IN SHAREHOLDER'S EQUITY

STATEMENT OF CASH FLOWS

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RULE 15c3-1

SCHEDULE II & III – EXEMPTIONS

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

- EXEMPTION REPORT





100 E. Sybelia Ave. Suite 130  
Maitland, FL 32751

Certified Public Accountants  
Email: [pam@ohabco.com](mailto:pam@ohabco.com)

Telephone 407-740-7311  
Fax 407-740-6441

## REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Shareholder's  
of Sun's Brothers Securities, Inc.

### Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Sun's Brothers Securities, Inc. as of September 30, 2023, the related statements of operations, changes in shareholder's equity, and cash flows for the year then ended, and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of Sun's Brothers Securities, Inc. as of September 30, 2023, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

### Basis for Opinion

These financial statements are the responsibility of Sun's Brothers Securities, Inc.'s management. Our responsibility is to express an opinion on Sun's Brothers Securities, Inc.'s financial statements based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to Sun's Brothers Securities, Inc. in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to error or fraud. Our audit included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audit provides a reasonable basis for our opinion.

### Auditor's Report on Supplemental Information

The Schedules I, II and III have been subjected to audit procedures performed in conjunction with the audit of Sun's Brothers Securities, Inc.'s financial statements. The supplemental information is the responsibility of Sun's Brothers Securities, Inc.'s management. Our audit procedures included determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the supplemental information. In forming our opinion on the supplemental information, we evaluated whether the supplemental information, including its form and content, is presented in conformity with 17 C.F.R. §240.17a-5. In our opinion, the Schedules I, II and III are fairly stated, in all material respects, in relation to the financial statements as a whole.

*Ohab and Company, P.A.*

We have served as Sun's Brothers Securities, Inc.'s auditor since 2022.

Maitland, Florida

January 15, 2024

**SUN'S BROTHERS SECURITIES, INC.**

**STATEMENT OF FINANCIAL CONDITION  
SEPTEMBER 30, 2023**

**ASSETS**

Current Assets

Cash in bank	\$	17,982
Receivable from clearing broker		6,473
Total Current Assets		<u>24,455</u>

Office Equipment: Net of accumulated  
depreciation of \$19,161

838

Other Assets

Deposit with clearing Broker-Dealer	101,813
Tax Receivable	111

Total Other Assets 101,924

Total Assets \$ 127,217

**LIABILITIES AND SHAREHOLDER'S EQUITY**

Current Liabilities

Accounts payable and accrued expenses \$ 52,409

Commissions payable 2,474

Total Current Liabilities 54,883

Other Liabilities

Line of Credit 17,463

Total Liabilities 72,346

Shareholder's equity:

Common stock, \$1.00 par value; 1,000

Shares authorized, issued and outstanding 1,000

Additional paid-in capital 136,307

Retained earnings (Deficit) (82,436)

Total Shareholder's Equity 54,871

Total Liabilities and Shareholder's Equity \$ 127,217

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

**SUN'S BROTHERS SECURITIES, INC.**

**STATEMENT OF OPERATIONS  
FOR THE YEAR ENDED SEPTEMBER 30, 2023**

**Revenue:**

Commissions	\$ 37,632
Selling Concession Mutual Funds	14,420
Realized Gain on Sales of Securities	2,068
Other Revenue	2,337
	<hr/> 56,457

**Expense:**

Depreciation	403
Interest expense	1,947
Compensation of officers	
Clearing & execution charges	25,992
Commissions expense	5,488
Rent	7,200
Hawaii General Excise Tax	1,319
Legal and Professional	50,061
Other operating expenses	35,989
Total Expenses	<hr/> 128,399
Net Loss	<hr/> (71,942)

<b>Net Loss</b>	<b>\$ <u>(71,942)</u></b>
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The accompanying notes are an integral part of these financial statements.



**SUN'S BROTHERS SECURITIES, INC.**

**STATEMENT OF CHANGES IN SHAREHOLDER'S EQUITY  
FOR THE YEAR ENDED SEPTEMBER 30, 2023**

	Share	Amount	Additional Paid-in capital	Retained Earnings/ (Accumulated Deficit)	Accumulated Other Comprehensive Income(loss)	Total
Balance, beginning of year	1,000	\$ 1,000	\$ 96,307	\$ (10,494)	\$ (1,663)	\$ 85,150
Capital Contribution			40,000			40,000
Net loss				(71,942)		(71,942)
Change in fair value of securities Available for sale					1,663	1,663
Balance, end of year	1,000	\$ 1,000	\$ 136,307	\$ (82,436)	\$ 0	\$ 54,871

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

# SUN'S BROTHERS SECURITIES, INC.

## STATEMENT OF CASH FLOWS FOR THE YEAR ENDED SEPTEMBER 30, 2023

Cash Flows from operating activities:	
Net Loss	\$ (71,942)
Depreciation	403
Change in fair value of securities available for sale	1,663
Adjustments to reconcile net loss to net cash provided by operations:	
Receivable from clearing broker	(3,404)
Commissions receivable	(164)
Accounts Payable	22,987
Commission Payable	485
Due to Shareholder	8,000
Tax Payable	241
	<hr/>
Net Cash Provided by Operating Activities	\$ (41,729)
Cash Flows from Investing Activities	
Deposit with Clearing Account	(786)
	<hr/>
Net Cash Provided by Investing Activities	\$ (786)
Cash flows from financing activities:	
Capital Contribution	\$ 40,000
Decrease in line of credit	(3,118)
	<hr/>
Net Cash Provided by financing activities	\$ 36,882
	<hr/>
Net change in Cash	\$ (5,633)
	<hr/>
Cash at Beginning of Year	\$ 23,615
Cash at End of Period	\$ 17,982
	<hr/>
Supplemental Information	
Interest Paid	\$1,945

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

## SUN'S BROTHERS SECURITIES, INC.

### **Note A – Summary of Significant Accounting Policies:**

#### **Nature of Operations:**

Sun's Brothers Securities, Inc. (the Company) is a Hawaii corporation formed on September 4, 2002. The Company is registered with the SEC as a securities broker-dealer pursuant to Section 15(b) of the Securities Exchange Act of 1934 and is a member of the Financial Industry Regulatory Agency ("FINRA").

In accordance with this registration, the nature and scope of the Company's activities are the sale of securities and related financial services in the State of Hawaii. The majority of the Company's revenue comes from trading of institutional bonds. The Company is required to maintain a minimum "net capital" of \$5,000 at all times.

#### **Basis of Accounting:**

The accompanying financial statements have been prepared in conformity with accounting principles generally accepted in the United State of America (GAAP).

#### **Estimates:**

The preparation of financial statements in conformity with GAAP requires management to make estimates and assumptions affect the reported amounts of assets and liabilities, and disclosure of contingent assets and liabilities, and reported revenues and expenses during the year. Actual results could differ from those estimates.

#### **Cash and Cash Equivalents:**

The Company considers all short-term investments with an original maturity of three months or less that are not required to be segregated under Federal or other regulations to be cash and cash equivalents.

#### **Office Equipment:**

Office equipment is recorded at cost. Depreciation is computed using the accelerated method over the estimated useful lives of the assets. Estimated useful lives used by the Company are as follows.

Office furniture and fixtures	7 years
Office equipment and machines	5 years
Computer and peripherals	5 years

## SUN'S BROTHERS SECURITIES, INC.

### NOTES TO FINANCIAL STATEMENTS

For the Year Ended September 30, 2023

#### Note A – Summary of Significant Accounting Policies (continued):

##### **Revenue from Contracts with Customers:**

The Company buys and sells securities on behalf of its customers. Each time a customer enters into a buy or sell transaction, the Company charges a commission. Commissions and related clearing expenses are recorded on the trade date (the date that the Company fills the trade order by finding and contracting with a counterparty and confirms the trade with the customer). The Company believes that the performance obligation is satisfied on the trade date because that is when the underlying financial instrument or purchaser is identified, the pricing is agreed upon and the risks and rewards of ownership have been transferred to/from the customer.

The Company enters into arrangements with pooled investment vehicles (funds) to distribute shares to investors. The Company may receive distribution fees paid by the fund up front, over time, upon the investor's exit from the fund (that is, a contingent deferred sales charge), or as a combination thereof. The Company believes that its performance obligation is the sale of securities to investors and as such this is fulfilled on the trade date. Any fixed amounts are recognized on the trade date and variable amounts are recognized to the extent it is probable that a significant revenue reversal will not occur once the uncertainty is resolved. For variable amounts, as the uncertainty is dependent on the value of the shares at future points in time as well as the length of time the investor remains in the fund, both of which are highly susceptible to factors outside the Company's influence, the Company does not believe that it can overcome this constraint until the market value of the fund and the investor activities are known, which are usually monthly or quarterly. Distribution fees recognized in the current period are primarily related to performance obligations that have been satisfied in prior periods.

##### **Comprehensive Income:**

Unrealized gain (loss) on securities available for sale for the year-ended are accounted for as Other Comprehensive Income (Loss) in the accompanying Statement of Operations. Accumulated unrealized gain (loss) on such securities is included in Accumulated Other Comprehensive Income/Loss on the accompanying Statement of Financial Condition.

##### **Income taxes:**

Income taxes are provided for the tax effects of transactions reported in the financial statements and consist of taxes currently due and deferred taxes due to temporary differences and loss carryforwards. The Company had a taxable loss for both Federal and State income tax purposes for the year ended September 30, 2023 and had an operating loss carryforward of approximately \$77,500 as of September 30, 2023. As a result, the Company had no current or deferred income tax liability.

The Company's tax filings are subject to audit by various taxing authorities. The Company's Federal Income Tax Returns for the years ended September 30, 2020 through September 30, 2022 remain open to examination by the Internal Revenue Service; State Income Tax Returns for the same periods remain open to examination by the State of Hawaii.

**SUN'S BROTHERS SECURITIES, INC.**

**NOTES TO FINANCIAL STATEMENTS**  
**For the Year Ended September 30, 2023**

**Note A – Summary of Significant Accounting Policies (continued):**

**Date of Management's review:**

Management has evaluated events subsequent to the balance sheet date for items requiring recording or disclosure in the financial statements. The evaluation was performed up to and including the date financial statements were issued. Based upon this review, the Company has determined that there were no events which took place that would have a material impact on its financial statements.

**Note B - Net Capital Requirements:**

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (SEC rule 15c3-1), which requires the maintenance of minimum net capital, and requirements that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At September 30, 2023, the Company had net capital of \$53,922 which was \$48,922 in excess of its required net capital of \$5,000. The Company's ratio of aggregate indebtedness to net capital was 1.34 to 1 at September 30, 2023.

**Note C – Receivable From and Deposit With Clearing Broker-Dealer:**

The Company clears customer transactions through another broker-dealer ("clearing broker") on a fully disclosed basis pursuant to a clearing agreement. In accordance with this agreement, the Company is required to maintain a deposit in cash and/or securities. Securities on deposit with the clearing broker are valued at fair value. The deposit is refundable if, and when, the Company ceases doing business with the clearing broker.

Receivable from clearing broker at September 30, 2023 consists of commissions receivable, net of clearing fees and expenses. Management has evaluated the receivable and considered this amount to be fully collectible, therefore, no allowance for credit loss is required.

**Note D - Fair Value of Financial Instruments**

Accounting principles generally accepted in the United States of America (GAAP) 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 GAAP are used to measure fair value.



## **SUN'S BROTHERS SECURITIES, INC.**

### **NOTES TO FINANCIAL STATEMENTS**

**For the Year Ended September 30, 2023**

#### **Note D - Fair Value of Financial Instruments (continued)**

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.

At the end of the period the Company doesn't have any financial instruments other than cash.

#### **Note E – Related Party Information**

The sole shareholder has provided office space for the Company on a month to month basis, for which the Company has incurred \$7,200 in rent expense. As of September 30, 2023 the Company had \$20,800 due to shareholder for rent for the years ended 2021 and 2023.

#### **Note F – Concentrations**

Majority of the commission revenue earned for the year ended September 30, 2023 came from transactions on behalf of 6 customers.

#### **Note G – Line of Credit**

The Company has an unsecured line of credit agreement with Central Pacific Bank which provides that the Company may borrow up to \$20,000. Borrowing under the line accrues interest at an annual rate of 10.00% and daily periodic rate of .0274%. There was an outstanding balance of \$17,463 on September 30, 2023. The line of credit doesn't have maturity date.

#### **Note H – Company Conditions**

The Company has a loss of \$71,942 for the year ending September 30, 2023, and has received capital contributions from its stockholder for working capital. The Company's stockholder has represented that he intends to continue making capital contributions, as needed, to ensure the Company's continuing operation. The stockholder has the financial wherewithal to continue contributing, as required.

## **SUN'S BROTHERS SECURITIES, INC.**

### **Note H – Company Conditions (continued)**

Management expects the Company to continue as going concern and the accompanying financial statements have been prepared on a going-concern basis without adjustments for realization in the event the Company ceases to continue as a going concern.

### **Note I – Commitments and Contingencies**

The Company was the subject of a FINRA investigation for violations of certain rules, which was fined \$15,000. It is accrued at year end.

**SUN'S BROTHERS SECURITIES, INC.**

**SCHEDULE I - SUPPLEMENTARY INFORMATION  
SEPTEMBER 30, 2023**

**COMPUTATION OF NET CAPITAL**

Total ownership equity (from statement of financial condition)	\$ 54,871
Add:	
Allowable credits	-
Total capital and allowable credits	<u>54,871</u>
Deduct:	
Non-allowable assets	<u>949</u>
Net capital before haircuts on securities positions	<u>53,922</u>
Haircuts on securities	
Net Capital	<u>\$ 53,922</u>

**COMPUTATION OF BASIC NET CAPITAL REQUIREMENTS**

Minimum net capital required: (6-2/3%) of aggregate indebtedness:

Aggregate indebtedness	<u>\$ 72,346</u>
6-2/3% of above	<u>4,823</u>
Minimum dollar net capital requirement of broker-dealer	<u>5,000</u>
Net capital requirement (greater of above amounts)	<u>5,000</u>
Excess net capital	<u>\$ 48,922</u>

There are no material differences between the computations above and the computations included in the Company's corresponding unaudited Form X-17A-5 Part IIA filing, as amended on

**SUN'S BROTHERS SECURITIES, INC.**

**Schedules II & III**  
**September 30, 2022**

**Schedule II**

**Computation for Determination of Reserve Requirements under Rule 15c3-3 of the Securities Exchange Commission**

The Company is exempt from the provisions of Rule 15c3-3 under the Securities Exchange Act of 1934 pursuant to paragraph (k)(2)(ii) of the rule and is considered a "Non-Covered Firm" by relying on Footnote 74 to SEC Release 34-70073.

**Schedule III**

**Information Relating to the Possession or Control Requirements under Rule 15c3-3 of the Securities Exchange Commission**

The Company is exempt from the provisions of Rule 15c3-3 under the Securities Exchange Act of 1934 pursuant to paragraph (k)(2)(ii) of the rule and is considered a "Non-Covered Firm" by relying on Footnote 74 to SEC Release 34-70073.



100 E. Sybelia Ave. Suite 130  
Maitland, FL 32751

Certified Public Accountants  
Email: [pam@ohabco.com](mailto:pam@ohabco.com)

Telephone 407-740-7311  
Fax 407-740-6441

## REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Shareholder's  
of Sun's Brothers Securities, Inc.

We have reviewed management's statements, included in the accompanying Exemption, in which (1) Sun's Brothers Securities, Inc. identified the following provision(s) of 17 C.F.R. §15c3-3(k) under which Sun's Brothers Securities, Inc. claimed the following exemption(s) from 17 C.F.R. §240.15c3-3: (k)(2)(ii) and (2) Sun's Brothers Securities, Inc. stated that Sun's Brothers Securities, Inc. met the identified exemption provisions throughout the most recent fiscal year without exception.

The Company is also filing this Exemption Report because the Company's other business activities contemplated by Footnote 74 of the SEC Release No. 34-70073 adopting amendments to 17 C.F.R. § 240.17a-5 are limited to mutual funds retailer. In addition, the Company did not directly or indirectly receive, hold, or otherwise owe funds or securities for or to customers, other than money or other consideration received and promptly transmitted in compliance with paragraph (a) or (b)(2) of Rule 15c2-4 and/or funds received and promptly transmitted for effecting transactions via subscriptions on a subscription way basis where the funds are payable to the issuer or its agent and not to the Company; did not carry accounts of or for customers; and did not carry PAB accounts (as defined in Rule 15c3-3) throughout the most recent fiscal year without exception.

Sun's Brothers Securities, Inc.'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 Sun's Brothers Securities, Inc.'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(s) (k)(2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934 and the Company's other business activities contemplated by Footnote 74 of the SEC Release No. 34-70073 adopting amendments to 17 C.F.R. § 240.17a-5, and related SEC Staff Frequently Asked Questions.

*Ohab and Company, P.A.*

Maitland, Florida

January 15, 2024



# SUN'S BROTHERS SECURITIES, INC.

## EXEMPTION REPORT

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

- The Company claimed an exemption from 17 C.F.R. § 240.15c3-3 under the following provision of 17 C.F.R. §240.15c3-3 (k)(2): (k)(2)(ii).
- The Company met the identified exemption provision throughout the most recent fiscal year without exception.
- The Company is also filing this Exemption Report because the Company's other business activities contemplated by Footnote 74 of the SEC Release No. 34-70073 adopting amendments to 17 C.F.R. § 240.17a-5 are limited to: Mutual Fund retailer, and the Company (1) did not directly or indirectly receive, hold, or otherwise owe funds or securities for or to customers, (other than money or other consideration received and promptly transmitted in compliance with paragraph (a) or (b)(2) of Rule 15c2-4 and/or funds received and promptly transmitted for effecting transactions via subscriptions on a subscription way basis where the funds are payable to the issuer or its agent and not to the Company); (2) did not carry accounts of or for customers; and (3) did not carry PAB accounts (as defined in Rule 15c3-3) throughout the most recent fiscal year without exception.

Sun's Brothers Securities, Inc.

I, Min Won Yang, swear (or affirm) that, to my best knowledge and belief, this Exemption Report is true and correct.

Signature: Min Won Yang

Name and Title: Min Won Yang, President

Date: 01/10/24