

**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

**REPORTS PURSUANT TO RULES 17a-5(d)**

**YEAR ENDED DECEMBER 31, 2022**

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

ANNUAL REPORTS  
FORM X-17A-5  
PART III

OMB APPROVAL
OMB Number: 3235-0123 Expires: Oct. 31, 2023 Estimated average burden hours per response: 12
SEC FILE NUMBER
8-69363

FACING PAGE

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

FILING FOR THE PERIOD BEGINNING 01/01/22 AND ENDING 12/31/22  
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF FIRM: Trutoro (Veritas Independent Partners, LLC)

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.)

2201 Washington Ave, Suite 2

(No. and Street)

Conway

Arkansas

72032

(City)

(State)

(Zip Code)

PERSON TO CONTACT WITH REGARD TO THIS FILING

Debra Shannon

501-358-6131

debra@trutoro.com

(Name)

(Area Code – Telephone Number)

(Email Address)

B. ACCOUNTANT IDENTIFICATION

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

Mercurius & Associates LLP

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

A-94/8, Wazirpur Industrial Area, Main Ring Road

New Delhi

Delhi

110052

(Address)

(City)

(State)

(Zip Code)

02/10/2009

3223

(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, Debra Shannon, swear (or affirm) that, to the best of my knowledge and belief, the financial report pertaining to the firm of Trutoro (Veritas Independent Partners, LLC), as of December 31, 2022, 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.

KRISTIN JARRELL  
NOTARY PUBLIC  
FAULKNER COUNTY, ARKANSAS  
COMM. EXP. 04/27/2031  
COMMISSION NO. 12714436

Signature: Debra Shannon

Title: Managing Member

Kristin Jarrell  
Notary Public

**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.**



# Mercurius & Associates LLP

(formerly known as AJSH & Co LLP)  
LLPIN : AAG-1471

A-94/8, Wazirpur Industrial Area,  
Main Ring Road, Delhi – 110052  
+91 11 45596689  
www.masllp.com  
info@masllp.com

## Report of the Independent Registered Public Accounting Firm

To the Members of

Trutoro (Veritas Independent Partners, LLC)

### Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Trutoro (Veritas Independent Partners, LLC) (the "Company") as of December 31, 2022 and the related statements of income, changes in member's equity and cash flows for the year 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 the Company as of December 31, 2022, and the results of its operations and its cash flows for the year ended, in conformity with accounting principles generally accepted in the United States of America.

### Basis for Opinion

These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the Company'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 the Company 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 information contained in Schedule I - Computation of Net Capital pursuant to Uniform Net Capital Rule 15c3-1 of Securities and Exchange Commission ("Supplemental Information") has been subjected to audit procedures performed in conjunction with the audit of Company's financial statements. The Supplemental Information is the responsibility of the Company's management. Our audit procedures included determining whether the Supplemental Information reconciles to the financial statements or the underlying accounting and other records, as applicable and performing procedures to test the completeness and accuracy of the information presented in the Supplemental Information.





In forming our opinion on the Supplemental Information, we evaluated whether the Supplemental Information, including its form and content, is presented in conformity with 17 C.F.R § 240.17a-5. In our opinion, the Supplemental Information is fairly stated, in all material respects, in relation to the financial statements as a whole.

*Mercurius & Associates LLP*

**Mercurius & Associates LLP**

*(Formerly known as AJSH & Co LLP)*

We have served as Trutoro's (Veritas Independent Partners, LLC) Auditor since 2018.

New Delhi, India

March 15, 2023

**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

**STATEMENT OF FINANCIAL CONDITION**

**DECEMBER 31, 2022**

**ASSETS**

Cash	\$ 64,002
Commissions receivable	114,583
Central registration depository account	1,913
Prepaid expenses	<u>10,837</u>
<i><b>Total assets</b></i>	<b><u>\$ 191,335</u></b>

**LIABILITIES AND MEMBER'S EQUITY**

**LIABILITIES:**

Accounts payable and accrued expenses	\$ 89,854
Related party payables	<u>12,373</u>
<i><b>Total liabilities</b></i>	102,227

**COMMITMENTS AND CONTINGENCIES** (Notes 5 and 6) -

**MEMBER'S EQUITY** (Note 2) 89,108

***Total liabilities and member's equity*** **\$ 191,335**

The accompanying notes are an integral part of this statement.

**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

**STATEMENT OF INCOME**

**FOR THE YEAR ENDED DECEMBER 31, 2022**

**REVENUES:**

Commissions	\$ 2,122,803
Insurance income	26,343
Reimbursed expenses	45,930
Other income	5,356

<i><b>Total revenues</b></i>	<u>2,200,432</u>
------------------------------	------------------

**EXPENSES:**

Commission	1,806,641
Professional services	38,469
Personnel	166,814
General operating	90,303
Insurance	24,580
Regulatory	11,526
Marketing	5,647
Other	1,115

<i><b>Total expenses</b></i>	<u>2,145,095</u>
------------------------------	------------------

<b>NET INCOME</b>	<u><u>\$ 55,337</u></u>
-------------------	-------------------------

The accompanying notes are an integral part of this statement.

**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

**STATEMENT OF CASH FLOWS**

**FOR THE YEAR ENDED DECEMBER 31, 2022**

**CASH FLOWS FROM (TO) OPERATING ACTIVITIES:**

Net income	\$ 55,337
Adjustments to reconcile net income to net cash provided by operating activities:	
Increase in central registration depository account	(1,645)
Increase in prepaid expenses	(9,738)
Decrease in commissions receivable	10,099
Decrease in undeposited funds	3,150
Decrease in accounts payable and accrued expenses	(13,882)
(Decrease) in related party payables	<u>(5,601)</u>
Net cash provided by operating activities	37,720

**CASH FLOWS FROM FINANCING ACTIVITIES:**

Capital distribution	<u>(78,000)</u>
Net cash provided by financing activities	<u>(78,000)</u>

NET DECREASE IN CASH	(40,280)
CASH, at beginning of year	<u>104,282</u>
CASH, at end of year	<u><u>\$ 64,002</u></u>

The accompanying notes are an integral part of this statement.



**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

**STATEMENT OF CHANGES IN MEMBER'S EQUITY**

**FOR THE YEAR ENDED DECEMBER 31, 2022**

<b>BALANCES, December 31, 2021</b>	<b>\$ 111,771</b>
Distributions	(78,000)
Net income	<u>55,337</u>
<b>BALANCES, December 31, 2022</b>	<b><u><u>\$ 89,108</u></u></b>

The accompanying notes are an integral part of this statement.

# **TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

## **NOTES TO FINANCIAL STATEMENTS**

**December 31, 2022**

### **NOTE 1- ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

#### **Organization and Business**

Trutoro (Veritas Independent Partners, LLC) (the “Company”) is an Arkansas limited liability company formed on September 9, 2013. The Company is affiliated with Cardinal Investment Group (“Cardinal”), a registered branch office of the Company and Tartan Properties through common ownership. The Company is registered with the Securities and Exchange Commission (SEC), and licensed by the Financial Industry Regulatory Authority, Inc. (FINRA). The Company operates as a securities broker-dealer for mutual funds, variable annuities, and investment advisory services.

#### **15c3-3 Exemption**

The Company carries no customer funds or securities and therefore is exempt from the reserve and possession or control requirements under Rule 15c3-3(k)(2)(i) of the Securities Exchange Act of 1934. The Company identified the provisions of Footnote 74 under which the Company is not required to claim an exemption from 17 C.F.R. 240.15c3-3.

#### **Revenue Recognition**

The Company’s main source of revenue is mutual funds, variable annuities, and investment advisory services, which are accounted for as contracts with customers. Under the guidance for contracts with customers, the Company is required to (a) identify the contract(s) with a customer, (b) identify the performance obligations in the contract, (c) determine the transaction price, (d) allocate the transaction price to the performance obligations in the contract, and (e) recognize revenue when (or as) the Company satisfies its performance obligation.

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

For purposes of the statement of cash flows, the Company considers investments with a maturity of three months or less to be cash equivalents.

#### **Income Taxes**

The Company is not a taxable entity and thus the financial statements do not include a provision for income taxes. The Company’s members are taxed on their respective share of the Company’s earnings.

The Company is required to determine whether a tax position is more likely than not to be sustained upon examination by the applicable taxing authority, including resolution of any tax related appeals or litigation processes, based on the technical merits of the position. The Company files an income tax return in the U.S. federal jurisdiction, and may file income tax returns in various U.S. states. The Company is not subject to income tax return examinations by major taxing authorities for years before 2019. The tax benefit recognized is measured as the largest amount of benefit that has a greater than fifty percent likelihood of being realized upon ultimate settlement. De-recognition of a tax benefit previously recognized results in the Company recording a tax liability that reduces net assets. However, the Company’s conclusions regarding this policy may be subject to review and adjustment at a later date based on factors including, but not limited to, on-going analyses of and changes to tax laws, regulations and interpretations thereof. The Company recognizes interest accrued related to unrecognized tax benefits and penalties related unrecognized tax benefits in income taxes payable, if assessed. No interest expense or penalties have been recognized as of and for the year ended December 31, 2022.

## **TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

### **NOTES TO FINANCIAL STATEMENTS**

*(continued)*

#### **NOTE 1- ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES(cont'd)**

##### **Estimates**

Management uses estimates and assumptions in preparing these financial statements in accordance with accounting principles generally accepted in the United States of America. Those estimates and assumptions affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities, and the reported revenues and expenses. Actual results could vary from the estimates that were used.

##### **Leases**

The Company's accounting and reporting of its leases complies with FASB ASC 842, Lease. See Note 3.

#### **NOTE 2 – NET CAPITAL REQUIREMENTS**

Pursuant to the net capital provisions of Rule 15c3-1 of the Securities Exchange Act of 1934, the Company is required to maintain a minimum net capital, as defined under such provisions. At December 31, 2022, the Company had net capital and net capital requirements of \$76,358 and \$6,815, respectively. The Company's net capital ratio (aggregate indebtedness to net capital) was 1.34 to 1. According to Rule 15c3-1, the Company's net capital ratio shall not exceed 15 to 1.

#### **NOTE 3 – LEASES**

The Company is a lessee in a non-cancelable operating lease for office space subject to ASC 842, Leases. The lease agreement does not include a termination or renewal option for either party, or restrictive financial or other covenants. The non-cancelable operating lease is set to expire on May 1, 2023.

#### **NOTE 4 – RELATED PARTY TRANSACTIONS AND COMMITMENTS**

The Company is affiliated with Cardinal Investment Group ("Cardinal"), a registered branch office of the Company and Tartan Properties through common ownership.

The Company has an expense sharing agreement ("ESA") with Cardinal. Under the agreement, the Company pays an allocation of Cardinal's utilities.

The Company entered into a lease agreement with Tartan Properties which will expire May 1, 2023.

At December 31, 2022 there were related party payables of \$12,373 that are commissions due to the members of the Firm. The Firm has recorded \$60,000 as payroll expense and \$289,821 as commission expense paid to members for 2022.

**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

**NOTES TO FINANCIAL STATEMENTS**

*(continued)*

**NOTE 5 – FINANCIAL INSTRUMENTS, OFF-BALANCE SHEET RISK AND CONTINGENCIES**

The Company's financial instruments, including cash and cash equivalents, accounts receivable and other assets and accounts payable are carried at amounts that approximate fair value due to the short-term nature of those instruments.

**NOTE 6 – SUBSEQUENT EVENTS**

The Company has performed an evaluation of subsequent events through the date the financial statements were issued. The evaluation did not result in any subsequent events that required disclosures and/or adjustments.

## **SUPPLEMENTARY INFORMATION**



**SCHEDULE I**

**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**

**COMPUTATION OF NET CAPITAL  
UNDER RULE 15c3-1 OF THE SECURITIES EXCHANGE ACT OF 1934**

**DECEMBER 31, 2022**

**CREDIT:**

Stockholders' equity	\$ 89,108
----------------------	-----------

-

<i>Total credits</i>	<u>89,108</u>
----------------------	---------------

**DEBITS:**

Nonallowable assets:

Central registration depository account	1,913
---	-------

Prepaid expenses	10,837
------------------	--------

<i>Total debits</i>	<u>12,750</u>
---------------------	---------------

NET CAPITAL	76,358
-------------	--------

Minimum requirement of 6-2/3% of aggregate indebtedness of \$102,227 or \$5,000, whichever is greater	<u>6,815</u>
--	--------------

<i>Excess net capital</i>	<u><u>\$ 69,543</u></u>
---------------------------	-------------------------

**AGGREGATE INDEBTEDNESS:**

Accounts payable, accrued expenses & related party payables	<u><u>\$ 102,227</u></u>
---	--------------------------

RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL	<u><u>1.34 to 1</u></u>
--	-------------------------

**NOTE:** There are no material differences between the above computation of net capital and the corresponding computation as submitted by the Company with the unaudited Form X-17A-5 as of December 31, 2022.

See Independent Auditor's Report.



# Mercurius & Associates LLP

(formerly known as AJSH & Co LLP)

LLPIN : AAG-1471

A-94/8, Wazirpur Industrial Area,

Main Ring Road, Delhi – 110052

+91 11 45596689

www.masllp.com

info@masllp.com

## Report of Independent Registered Public Accounting Firm

To the Member of

**Trutoro (Veritas Independent Partners, LLC)**

We have reviewed Trutoro's (Veritas Independent Partners, LLC) assertions, included in the accompanying Trutoro's (Veritas Independent Partners, LLC) Exemption Report, in which:

- (1) Company does not claim an exemption under paragraph (k) of 17 C.F.R. §240.15c3-3 and
- (2) Company stated that it is filing the Exemption Report relying on Footnote 74 of the SEC Release No. 34-70073 adopting amendments to 17 C.F.R. §240.17a-5 because the company limits its business activities exclusively to effecting securities transactions via subscriptions on a subscription way basis where the funds are payable to the issuer or its agent and not to the Company; and company 1) did not directly or indirectly receive, hold, or otherwise owe funds or securities for or to customers 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 ended December 31, 2022, without exception.

The Company's management is responsible for the assertions and for compliance with the provisions of Footnote 74 of the SEC Release No.34-70073 adopting amendments to 17 C.F.R. §240.17a-5 throughout the year ended December 31, 2022.

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 provisions of Footnote 74 of the SEC Release No. 34-70073 adopting amendments to 17 C.F.R. §240.17a-5. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's assertions. 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 assertions referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in SEC Footnote 74 of the SEC Release No. 34-70073 adopting amendments to 17 C.F.R. § 240.17a-5.

*Mercurius & Associates LLP*

**Mercurius & Associates LLP**

(Formerly known as AJSH & Co LLP)

We have served as Trutoro's (Veritas Independent Partners, LLC) Auditor since 2018.

New Delhi, India

March 15, 2023



**TRUTORO (VERITAS INDEPENDENT PARTNERS, LLC)**  
**EXEMPTION REPORT**  
**REQUIREMENT FOR BROKER/DEALERS UNDER**  
**RULE 17a-5 OF THE SECURITIES EXCHANGE ACT OF 1934**

**DECEMBER 31, 2022**


Trutoro (Veritas Independent Partners, LLC) (the “Company”) is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, “Reports to be made by certain brokers and dealers”). This Exemption Report was prepared as required by 17 C.F.R. §240.17a-5(d)(1) and (4).

To the best of its knowledge and belief, the Company states the following:

(1) The Company does not claim an exemption under paragraph (k) of 17 C.F.R. § 240. 15c3-3, and

(2) The Company is filing this Exemption Report relying on Footnote 74 of the SEC Release No. 34-70073 adopting amendments to 17 C.F.R. § 240.17a-5 because the Company limits its business activities exclusively to: (1) effecting securities transactions via subscriptions on a subscription way basis where the funds are payable to the issuer or its agent and not to the Company; 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.

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

  
Signature

Managing Member  
Title

See Independent Auditor’s Report.