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JUL 30 2004
THOMSON
FINANCIAL



SI 04016502 COMMISSION
Washington, D.C. 20549

VF 7-2804

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ANNUAL AUDITED REPORT
FORM X-17A-5 (A)
PART III

SEC FILE NUMBER
8-26155

FACING PAGE
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 4/1/2003 AND ENDING 3/31/2004
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

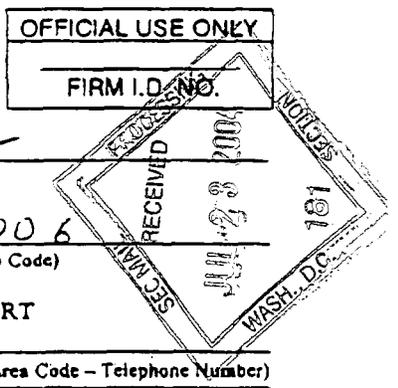
NAME OF BROKER-DEALER: Thomas P Reynolds Securities LTD

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)
45 Broadway, The Atrium 31st Floor
(No. and Street)

New York NY 10006
(City) (State) (Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

(Area Code - Telephone Number)



B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*

Remur, Michael T.
(Name - if individual, state last, first, middle name)

2642 Whitehorse Hamilton Sq Rd, Hamilton, NY 12069
(Address) (City) (State) (Zip Code)

CHECK ONE:

- Certified Public Accountant
- Public Accountant
- An accountant licensed in one or more States or any of its possessions

FOR OFFICIAL USE ONLY

OATH OR AFFIRMATION

I, Thomas S. Reynolds, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of Thomas P. Reynolds Securities, LTD, as of March 31, 2004, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:

[Signature]
Signature
Vice President
Title

[Signature]
Notary Public

KRISTINA M. MORRISON
Notary Public, State of New York
No. 01M06023599
Qualified in Kings County
Commission Expires April 26, 2007

This report ** contains (check all applicable boxes):

- (a) Facing Page.
- (b) Statement of Financial Condition.
- (c) Statement of Income (Loss).
- (d) Statement of Changes in Financial Condition.
- (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
- (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors.
- (g) Computation of Net Capital.
- (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
- (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-3 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- (l) An Oath or Affirmation.
- (m) A copy of the SIPC Supplemental Report.
- (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

**For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

✓ Reconciliation of Net Capital per Focus Report to Computation of Net Capital in Accordance with Rule 15-c-3-1 as per Audited Financial Statement dated March 31, 2004

✓ Copy of letter from NASD dated July 14, 2004.

Thomas P. Reynolds Securities, Ltd
45 Broadway - The Atrium
31st Floor
New York, NY 10006

Reconciliation of Net Capital per Focus Report to
Computation of Net Capital In Accordance with Rule 15-c 3-1
as per Audited Financial Statement dated March 31, 2004

Net Capital per Focus Report, March 31, 2004
Computation of Net Capital, Line 10

\$517,547

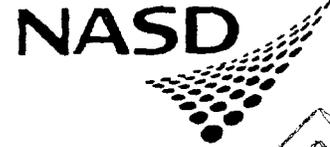
Audit Adjustments

| | | | |
|-----------|---|-----------------|------------------|
| Add: | | | |
| | Cash, Accrued Rebate Account | 448 | |
| | Additional 12 B1 Commission Income | <u>1,855</u> | <u>2,303</u> |
| Sub-Total | | | 519,850 |
| Less: | | | |
| | Rebates paid in August 2003 not booked | (97,491) | |
| | Accrued rebates recorded per Search for Unrecorded Liabilities | <u>(66,152)</u> | <u>(163,643)</u> |
| Sub-Total | | | <u>356,207</u> |

Other Adjustments

| | | | |
|--|---|--|---------------------|
| | Overstatement of Allowable Assets Receivables, Line 2 B | | (21,650) |
| | Overstatement of Liabilities Accounts payable, Line 17 | | (7,147) |
| | Overstatement of Non-Allowable Assets Property, Line 10 | | 654 |
| | Per Focus Report Minimum Net Capital Required (6 2/3 % of line 19) | | <u>13,376</u> |
| Sub-Total | | | 341,440 |
| Net Capital Per Audited Financial Statement Computation of Net Capital In Accordance with Rule 15-c 3-1 | | | <u>341,203</u> |
| Difference | | | <u><u>\$237</u></u> |

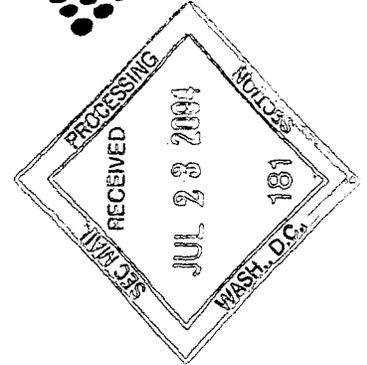
FAX To
THOMAS Skelly



Via Certified Mail
#7000 0520 0020 9283 1805

July 14, 2004

Mr. Thomas Reynolds
Thomas P. Reynolds Securities Ltd.
45 Broadway, The Atrium-31st Floor
New York, NY 10006



Dear Mr. Reynolds:

This acknowledges receipt of your March 31, 2004 annual filing of audited financial statements made pursuant to Securities and Exchange Commission (SEC) Rule 17a-5(d) (the Rule). The report as submitted appears deficient in that it did not contain the following:

A Reconciliation, including appropriate explanations, of the audited Computation of Net Capital and the broker-dealer's corresponding Unaudited Part II or Part IIA, if material differences existed, or If no material differences existed a statement so stating.

Therefore, your submission cannot be considered to comply with the requirements of the Rule. The text of the Rule is reproduced in the *NASD Manual* under the section titled *SEC Rules & Regulation T*, and we suggest that you review it with your independent accountant.

Pursuant to the provisions of NASD Rule 8210, we request that you immediately send one copy of the items listed above to this office and to the SEC regional or district office, and two copies to the SEC Washington, D. C. office. Your submissions must include a new completed Part III Facing Page, a copy of which is enclosed for your convenience.

Please respond to this matter by July 27, 2004. If you have any questions, please contact Thomas Skelly, Special Investigator at 212-858-4494.

Sincerely,

Frances Giardina
Staff Supervisor

FG:ec

Enclosure

cc: Ramona Lopez, Securities and Exchange Commission
Michael T. Remus, Certified Public Accountant

FAX 212-858-
4081

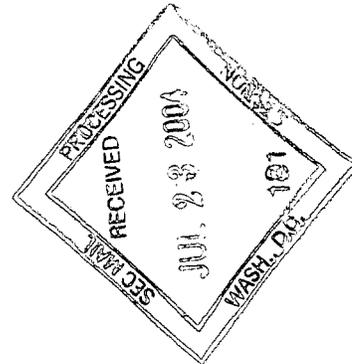
Reynolds Securities Ltd.
The Atrium, 45 Broadway
New York, NY 10006



VIA UPS NEXT DAY AIR

July 22, 2004

**Mr. Thomas Skelly
NASD
One Liberty Plaza
48th Floor
New York NY 10006**



Dear Mr. Skelly,

Enclosed you will find the item needed to complete our Annual Focus. I apologize for the oversight and thank you for your patience in this matter.

Should you have any questions, please do not hesitate to call me.

Sincerely,

**Thomas S. Reynolds
Managing Partner**

**TSR:lc
Enclosure**

**Cc: ✓ SEC Principal Office (Washington, DC)
SEC Northeast Regional Office (New York, NY)**

Member of National Association of Securities Dealers Inc.
Phone: 212-742-1616 Fax: 212-785-9377