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

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ANNUAL AUDITED REPORT
FORM X-17A-5
PART III
amended
FACING PAGE

SEC FILE NUMBER
8-53563

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

REPORT FOR THE PERIOD BEGINNING 01/01/2008 AND ENDING 12/31/2008
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER - DEALER: Willis Securities, Inc.

OFFICIAL USE ONLY
FIRM ID. NO.

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)

One World Financial Centre 200 Liberty Street, 3rd Floor
(No. and Street)

New York NY 10281
(City) (State) (Zip Code)

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

Mr. Steven Tompson, President Willis Securities (212) 915-8264
(Area Code - Telephone No.)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*

Deloitte & Touche LLP
(Name - if individual, state last, first, middle name)

424 Church Street Nashville TN 37219
(Address) (City) (State) (Zip Code)

CHECK ONE:

- Certified Public Accountant
- Public Accountant
- Accountant not resident in United States or any of its possessions.

FOR OFFICIAL USE ONLY

*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).

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WILLIS SECURITIES, INC.
(A Wholly Owned Subsidiary of Willis North America Inc.)

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This report contains (check all applicable boxes):

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- (b) Statement of Financial Condition (Not applicable)
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- (e) Statement of Changes in Stockholder's Equity (Not applicable)
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- Notes to Financial Statements (Not applicable)
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- (i) Information Relating to the Possession or Control Requirements for Brokers and Dealers Pursuant to Rule 15c3-3 Under the Securities Exchange Act of 1934
- (j) A Reconciliation, including Appropriate Explanations, of the Computation of Net Capital under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Rule 15c3-3
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- (l) An Oath or Affirmation
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- (o) Unconsolidated Schedule of Segregation Requirements and Funds in Segregation for Customers Trading on U.S. Commodity Exchanges Pursuant to Section 4d(2) Under the Commodity Exchange Act (Not applicable)

- () (p) Unconsolidated Schedule of Secured Amounts and Funds Held in Separate Accounts for Foreign Futures and Foreign Options Customers Pursuant to Regulation 30.7 Under the Commodity Exchange Act (Not applicable)

- () (q) Unconsolidated Schedule of Segregation Requirements and Funds in Segregation for Commodity Dealer Options Accounts Pursuant to Regulation 32.6 of the Commodity Futures Trading Commission (Not applicable)

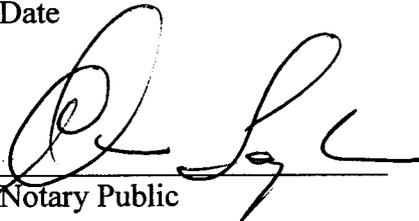
OATH OR AFFIRMATION

I, Steven Tompson, affirm that, to the best of my knowledge and belief, the accompanying supplemental schedules pertaining to Willis Securities, Inc., for the year ended December 31, 2008, are true and correct. I further affirm that neither the Company nor any officer or director has any proprietary interest in any account classified solely as that of a customer.



Steven Tompson, President

3/31/2009
Date



Notary Public

CLAUDIA TAYLOR
NOTARY PUBLIC, State of New York
No. 01TA5068172
Qualified in Kings County
Commission Expires 10/28/2010

WILLIS SECURITIES, INC.

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**SCHEDULE I — COMPUTATION OF NET CAPITAL FOR BROKERS AND DEALERS
PURSUANT TO RULE 15c3-1 UNDER THE SECURITIES EXCHANGE ACT OF 1934
AS OF DECEMBER 31, 2008**

Net capital — Total stockholder's equity	\$ 2,824,545
Deductions:	
Nonallowable assets from statement of financial condition —	
Other assets	(137,934)
Haircuts on securities	<u>(11,130)</u>
Net capital	<u>\$ 2,675,481</u>
Minimum net capital required	<u>\$ 250,000</u>
Excess net capital	<u>\$ 2,425,481</u>

**Statement Pursuant to Paragraph (d) (4) of Rule 17a-5 of the Securities and
Exchange Commission**

There are no material differences between the above computation and computation included
in the Company's unaudited Focus Report filed by the Company on January 22, 2009.

WILLIS SECURITIES, INC.

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**SCHEDULE II — COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS
PURSUANT TO RULE 15c3-3 UNDER THE SECURITIES EXCHANGE ACT OF 1934
AS OF DECEMBER 31, 2008**

Credit balances	\$	0
Debit balances	\$	0
Excess of total credits over total debits	\$	0
Required deposit	\$	0
Amount held on deposit in "reserve bank account" at December 31, 2008	\$	0

**Statement Pursuant to Paragraph (d) (4) of Rule 17a-5 of the Securities and
Exchange Commission**

There are no material differences between the above computation and computation included
in the Company's unaudited Focus Report filed by the Company on January 22, 2009.

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**SCHEDULE III – INFORMATION RELATING TO POSSESSION OR CONTROL REQUIREMENTS
PURSUANT TO RULE 15c3-3 UNDER THE SECURITIES EXCHANGE ACT OF 1934
AS OF DECEMBER 31, 2008**

1. Customers' fully paid securities and excess margin securities not in the respondent's possession or control as of December 31, 2008, for which instructions to reduce to possession or control had been issued as of December 31, 2008 but for which the required action was not taken by respondent within the time frames specified under Rule 15c3-3.	\$	0
A. Number of items		0
2. Customers' fully paid securities and excess margin securities for which instructions to reduce to possession or control has not been issued as of December 31, 2008, excluding items arising from "temporary lags which result from normal business operations" as permitted under Rule 15c3-3.	\$	0
A. Number of items		0

Statement Pursuant to Paragraph (d) (4) of Rule 17a-5 of the Securities and Exchange Commission

There are no material differences between the above computation and computation included in the Company's unaudited Focus Report filed by the Company on January 22, 2009.