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PART III

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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	01/01/2011	AND ENDING	12/31/2011	
	MM/DD/YY		MM/DD/YY	
A. REGIS	STRANT IDENTIFIC	CATION		
NAME OF BROKER-DEALER: CFT Securities, LLC ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)		OFFICIAL USE ONLY		
		ox No.)	FIRM I.D. NO.	
379 Thornall Street, 6th l	Floor			
	(No. and Street)			
Edison	NJ		08837	
(City)	(State)		(Zip Code)	
NAME AND TELEPHONE NUMBER OF PERS Gary A. Budlow	SON TO CONTACT IN F	REGARD TO THIS RE	PORT 732-632-4146	
			(Area Code – Telephone Numbe	
B. ACCOU	UNTANT IDENTIFI	CATION		
Untracht Early LLC	se opinion is contained in	-		
325 Columbia Turnpike - Suite 202	Florham Park	N. J.	07932	
(Address)	(City)	SECULE) THE	S AND EXCHANGE COMMISSION RECEDED	
CHECK ONE: Certified Public Accountant			JUN 1 4 2012	
☐ Public Accountant ☐ Accountant not resident in United	States or any of its posse	ssions. 12 REGI	STRATIONS BRANCH	
FO	R OFFICIAL USE O	NLY		

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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)

OATH OR AFFIRMATION

Ι,	Gary A. Budlow	, sv	vear (or affirm) that, to the best of
my knowle	edge and belief the accompanying financ CFT Securities, LLC	al statement and supporting schedul	les pertaining to the firm of
of		2011 are true and corre	ect. I further swear (or affirm) that
	e company nor any partner, proprietor, p		
	solely as that of a customer, except as follows:		
	•		
		- My	Mou
		/ ∠Sign	ature
	STEVEN	BERGIDA CEO PL	ESIDEM
	Commissio Notary Public, S	n # 2340901 Ti	itle View of the
St.	My Commit	sion Expires 25, 2016	
Su	Notary Public		
This repor	t ** contains (check all applicable boxes	:	
	acing Page.		:
	atement of Financial Condition.		
	atement of Income (Loss). atement of Cash Flow.		
	atement of Changes in Stockholders' Equ	ity or Partners' or Sole Proprietors'	Capital.
☐ (f) St	atement of Changes in Liabilities Subord		
☐ (g) Co	omputation of Net Capital.		
(h) Co	omputation for Determination of Reserve	Requirements Pursuant to Rule 15c	3-3. 5-2-3
	formation Relating to the Possession or (Reconciliation, including appropriate exp	ontrol Requirements Under Rule 1. Innation of the Computation of Net C	Canital Under Rule 15c3-1 and the
U () А	omputation for Determination of the Res	rve Requirements Under Exhibit A	of Rule 15c3-3.
□ (k) A	Reconciliation between the audited and	naudited Statements of Financial C	ondition with respect to methods of
cc	onsolidation.		
	n Oath or Affirmation.		
№ (m) A	copy of the SIPC Supplemental Report. report describing any material inadequaci	s found to exist or found to have exis	ted since the date of the previous audit
니 (n) A	report describing any material inadequact	29 TOWNER TO EXIST OF TOWNER TO HAVE EXIS	ted since the date of the previous addit.
**For con	ditions of confidential treatment of certa	n portions of this filing, see section	240.17a-5(e)(3).

Report on Audit of Financial Statement
and Supplementary Reports on Agreed-Upon
Procedures and Internal Control
Pursuant to Rule 17a-5 of the
Securities Exchange Act of 1934

December 31, 2011



Report on Audit of Financial Statement
and Supplementary Reports on Agreed-Upon
Procedures and Internal Control
Pursuant to Rule 17a-5 of the
Securities Exchange Act of 1934

December 31, 2011



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December 31, 2011

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Independent Auditors' Report

To the Member of CFT Securities, LLC

We have audited the accompanying statement of financial condition of CFT Securities, LLC (the "Company") as of December 31, 2011 that you are filing pursuant to Rule 17a-5 under the Securities Exchange Act of 1934 and Regulation 1.16 of the Commodity Futures Trading Commission. This financial statement is the responsibility of the Company's management. Our responsibility is to express an opinion on this financial statement based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free of material misstatement. An audit includes consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion. An audit also includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statement, assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statement referred to above presents fairly, in all material respects, the financial position of CFT Securities, LLC as of December 31, 2011, in conformity with accounting principles generally accepted in the United States of America.

Untracht Early LLC

Florham Park, New Jersey February 22, 2012

Assets

Statement of Financial Condition December 31, 2011

Cash and cash equivalents \$ 584,350 Receivables from clearing organizations 306,230 Non-discretionary fees receivable 3,506 Prepaid expenses 55,309 Security deposit 21,206 Property and equipment, net of accumulated depreciation of \$111,048 15,895 **Total assets** 986,496

Liabilities and Member's Equity

Total liabilities and member's equity

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Accounts payable and accrued expenses	\$ 337,250
Total liabilities	 337,250
Member's equity	 649,246

See accompanying notes to financial statement.



986,496

Notes to Financial Statement December 31, 2011

1. Organization and Business

CFT Securities, LLC (the "Company") is a fully disclosed introducing securities broker dealer registered with the Securities and Exchange Commission (the "SEC") and is a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation. The Company is an introducing broker under the Commodity Exchange Act and is exempt from Section 4d(2) under this Act. Additionally, the Company is a member of the National Futures Association and the Municipal Securities Rulemaking Board. The Company is a Delaware Corporation that is wholly owned by its sole member Burgundy Group, LLC ("Burgundy").

In October 2011, Burgundy executed a deal (the "Transaction") with JEMC Capital, LLC ("JEMC") to sell its outstanding equity interest in the Company pursuant to an Equity Interest Purchase Agreement (the "Agreement") based on compliance with certain mutually binding covenants between JEMC and Burgundy. The Transaction is contemplated to close in the first quarter of 2012 based on the fulfillment of certain criteria as discussed in the Agreement (see Note 7).

The Company operates pursuant to SEC Rule 15c3-3(k) (2) (ii) (the "Customer Protection Rule"). It does not hold customer funds or safekeep customer securities. J.P. Morgan Clearing Corp. ("J.P. Morgan") and RBC Capital Markets Corporation ("RBC") are the Company's clearing brokers.

2. Summary of Significant Accounting Policies

The financial statement of the Company has been prepared in accordance with generally accepted accounting principles in the United States of America ("US GAAP"). The Financial Accounting Standards Board's ("FASB") Accounting Standards Codification ("ASC") has become the exclusive reference of authoritative US GAAP recognized by the FASB to be applied by non-governmental entities. The following is a summary of significant accounting policies used in preparing the financial statement:

Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect amounts and disclosures in the financial statements. Actual results could differ from those estimates.

Cash and Cash Equivalents

The Company considers amounts due from banks and all highly liquid investments, including those with an initial maturity of three months or less, not held for sale in the normal course of business and cash on deposit in interest-bearing accounts with the clearing broker to be cash equivalents.

Receivables from Clearing Organizations and Non-Discretionary Fees Receivable

Receivables are considered fully collectible by management and, accordingly, no allowance for doubtful accounts is considered necessary.



Notes to Financial Statement December 31, 2011

2. Summary of Significant Accounting Policies (continued)

Property and Equipment

Property and equipment are recorded at cost. Depreciation is computed using the straight-line method over the estimated useful lives of the related assets.

Expenditures for repairs and maintenance are charged to operations as incurred; additions and improvements are capitalized.

Income Taxes

No provision for federal or state income taxes has been made in the accompanying financial statement since such liabilities, if any, are the responsibility of the Company's sole member.

The authoritative guidance issued by FASB requires management to determine whether it is more likely than not that a tax position will be sustained upon examination by the applicable taxing authority, including resolution of any related appeals or litigation processes, based on the technical merits of the position. The tax benefit to be recognized is measured as the largest amount of benefit that is greater than 50% likely of being realized upon settlement. De-recognition of a tax benefit previously recognized could result in the Company recording a tax liability that would reduce net assets.

3. Property and Equipment

Property and equipment consists of the following:

Computer and equipment	\$ 88,397
Furniture and fixtures	38,546
Less: accumulated depreciation	 (111,048)
	\$ 15,895

4. Financial Instruments with Off-Balance-Sheet Credit Risk and Concentrations of Credit Risk

As a securities broker, the Company's transactions are executed with and on behalf of customers. The Company introduces these transactions for clearance to a clearing firm on a fully disclosed basis.

In the normal course of business, the Company's customer activities involve the execution of securities transactions and settlement by its clearing brokers. The agreement between the Company and its clearing brokers provides that the Company is responsible for all required customer payments, maintenance of the margin in each margin account, payment of any unsecured debit balances, payment and delivery of "when issued" transactions, and delivery of securities in good form related to nonperformance of its customers. These activities may expose the Company to off-balance-sheet credit risk in the event the customer is unable to fulfill its contractual obligations.



Notes to Financial Statement December 31, 2011

4. Financial Instruments with Off-Balance-Sheet Credit Risk and Concentrations of Credit Risk (continued)

In the event a customer fails to satisfy its obligations, the Company may be required to purchase or sell financial instruments at prevailing market prices in order to fulfill the customer's obligations, or the clearing brokers have the right to execute purchases and sales if the Company declines to act.

The Company seeks to control off-balance-sheet credit risk by monitoring its customer transactions, properly training and supervising personnel, reviewing information it receives from its clearing brokers on a daily basis, and reserving for doubtful accounts when necessary.

5. Commitments

The Company leases office space in New Jersey under an agreement that expires on January 31, 2012. On September 12, 2011, the Company extended its current lease for an additional twelve months through January 31, 2013.

6. 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 requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At December 31, 2011, the Company had net capital of \$553,330, which was \$453,330 in excess of its required net capital of \$100,000. The Company's aggregate indebtedness to net capital ratio was 0.61 to 1.

7. Subsequent Events

The Company's management has evaluated the period from January 1, 2012 to February 22, 2012, the date the financial statement was available to be issued, for subsequent events requiring recognition or disclosure in the financial statement. On January 1, 2012, Burgundy and JEMC executed an Equity Interest Assignment Agreement to close the Transaction discussed in Note 1 for consideration stipulated in the Agreement. Subsequently, on January 11, 2012 the Transaction was closed.



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Independent Auditors' Report on Applying Agreed-Upon Procedures Related to an Entity's SIPC Assessment Reconciliation

To the Member of CFT Securities, LLC

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the Schedule of Assessment and Payments [General Assessment Reconciliation ("Form SIPC-7")] to the Securities Investor Protection Corporation ("SIPC") for the year ended December 31, 2011, which were agreed to by CFT Securities, LLC (the "Company") and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and SIPC, solely to assist you and the other specified parties in evaluating the Company's compliance with the applicable instructions of the Form SIPC-7. The Company's management is responsible for the Company's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

- 1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement records that were entered in the Company's accounting software noting no differences;
- Compared the amounts reported on the audited Form X-17A-5 for the year ended December 31, 2011, as applicable, with the amounts reported in Form SIPC-7 for the year ended December 31, 2011, noting no differences;
- 3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and the Company's books and records noting no differences;
- Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the Company's books and records and related schedules supporting the adjustments noting no differences; and
- 5. Compared the amount of any overpayment applied to the current assessment with the Form SIPC-7 on which it was originally computed. There was no overpayment noted on the Form SIPC-7.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

Florham Park, New Jersey February 22, 2012

Untracht Early LLC



Independent Auditors' Report on Internal Control Structure

To the Member of CFT Securities, LLC

In planning and performing our audit of the financial statement of CFT Securities, LLC (the "Company"), as of December 31, 2011, in accordance with auditing standards generally accepted in the United States of America, we considered the Company's internal control over financial reporting ("internal control") as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statement, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we do not express an opinion on the effectiveness of the Company's internal control.

Also, as required by Rule 17a-5(g)(1) of the Securities and Exchange Commission ("SEC") and Regulation 1.16 of the Commodity Futures Trading Commission ("CFTC"), we have made a study of the practices and procedures followed by the Company including consideration of control activities for safeguarding securities. This study included tests of such practices and procedures that we considered relevant to the objectives stated in Rule 17a-5(g) and Regulation 1.16 in making the periodic computations of aggregate indebtedness and net capital under Rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of Rule 15c3-3 and for determining compliance with the exemptive provisions of 4d(2) and Regulation 30.7 of the CFTC. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company in any of the following:

- Making quarterly securities examinations, counts, verifications, and comparisons and recordation of differences required by Rule 17a-13
- 2. 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

The management of the Company is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the SEC's and the CFTC's previously mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition, and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of the financial statement in conformity with generally accepted accounting principles. Rule 17a-5(g) and Regulation 1.16(d)(2) list additional objectives of the practices and procedures listed in the preceding paragraph.

Because of inherent limitations in internal control and the practices and procedures referred to above, error or fraud may occur and not be detected. Also, projection of any evaluation of them to future periods is subject to the risk that they may become inadequate because of changes in conditions or that the effectiveness of their design and operation may deteriorate.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A significant deficiency is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

F 973.408.9275

A *material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the Company's financial statement will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. We did not identify any deficiencies in internal control and control activities for safeguarding securities that we consider to be material weaknesses, as defined previously.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC and CFTC to be adequate for their purposes in accordance with the Securities Exchange Act of 1934, the Commodity Exchange Act, and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures, as described in the second paragraph of this report, were adequate at December 31, 2011, to meet the SEC's and the CFTC's objectives.

This report is intended solely for the information and use of management, the SEC, the CFTC, and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 or Regulation 1.16 of the Commodity Futures Trading Commission in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

Untracht Early LLC

Florham Park, New Jersey February 22, 2012

