UNITE UNITE AND EXCHANGE COMMISSION RITIES AND EXCHANGE RITIES AND EX Washington, L

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FEB 29 2012

**ANNUAL AUDITED REP FORM X-17A-5** PART III

SEC FILE NUMBER 67239

DIVISION OF TRADING & MARKETS

**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_	. ilifu	AND ENDING_\2	131/11
	MM/DD/YY	TO 1 00 TO 1	MM/DD/YY
A. REG	ISTRANT IDENTIF	ICATION	
NAME OF BROKER-DEALER: Broke	ers Internat Financial	erus ers LL E	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE OF BUSI	· ·		FIRM I.D. NO.
	(No. and Street)		
(City)	(State)	(Zi	p Code)
NAME AND TELEPHONE NUMBER OF PER	RSON TO CONTACT IN	REGARD TO THIS REPO	DRT
	<del></del>	(4	Area Code – Telephone Number
B. ACCO	DUNTANT IDENTIF	ICATION	
<u> </u>	hose opinion is contained  Z, bell + C.  Name - if individual, state last	o. P.L.L.P	
	range – y marriana, state tasi	, first, middle name;	
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:		•	
Certified Public Accountant			
Public Accountant		•	
☐ Accountant not resident in Unite	d States or any of its pos	sessions.	
	OR OFFICIAL USE	DNLY	

\*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)

SEC 1410 (06-02)

Potential 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.

## BROKERS INTERNATIONAL FINANCIAL SERVICES, LLC

Panora, Iowa

Agreed-Upon Procedures Report

For the year ended December 31, 2011

## BROKERS INTERNATIONAL FINANCIAL SERVICES, LLC

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# INDEPENDENT ACCOUNTANT'S REPORT ON APPLYING AGREED-UPON PROCEDURES RELATED TO AN ENTITY'S SIPC ASSESSMENT RECONCILIATION

Board of Directors and Management Brokers International Financial Services, LLC Panora, Iowa

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 accompanying 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 Brokers International Financial Services, LLC (the Company) as established by the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and SIPC, in evaluating the Company's compliance with the applicable instructions of the General Assessment Reconciliation (Form SIPC-7). The Company's management is responsible for the Company's compliance with these 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 preformed and our findings are as follows:

- 1. Compared the listed assessment payment in Form SIPC-7 with respective cash disbursement records entries in the check register noting no differences;
- Compared the amounts of 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 working papers of income and expense, for the year ended December 31, 2011 noting no differences;
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers of income and expense, for the year ended December 31, 2011 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 noting no overpayments.

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 did not express such an opinion. Had we preformed additional procedures, other matters might have come to our attention that would have been reported to you.

We have no responsibility to update this report for events or circumstances occurring after the date of this report. 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.

Certified Public Accountants

Boulay, Hentmake, 3 Hell + 6. P. L. L. P.

Minneapolis, Minnesota February 17, 2012

(33-REV 7/10)

# SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300 General Assessment Reconciliation

(33-REV 7/10)

For the liscal year ended <u>Security 317 F20 119</u> [7] 2: [3] (Read carefully the instructions in your Working Copy before completing this Form)

TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL	YEAR ENDINGS
<ol> <li>Name of Member, address, Designated Examining Authority, 1934 Act registration in purposes of the audit requirement of SEC Rule 17a-5:</li> </ol>	o, and month in which liscal year ends for
Brokers International Financial Services 102 58 18th Street Po Box 1084 Panera, IA 50216	Note: If any of the information shown on the mailing label requires correction, please e-mail any corrections to form@sipc.org and so indicate on the form filed.  Name and telephone number of person to contact respecting this form.  Andrea Kemble 877-886-1939
2. A. General Assessment (item 2e from page 2)	<u>5 74/8</u> ( 3254)
B. Less payment made with SIPC-6 filed (exclude interest)	( <u> </u>
Date Paid  C. Less prior overpayment applied	()
D. Assessment balance due or (overpayment)	4162
E. Interest computed on late payment (see instruction E) fordays at 20% per	
F. Total assessment balance and interest due (or overpayment carried forward)	\$ 4162
G. PAID WITH THIS FORM: Check enclosed, payable to SIPC Total (must be same as F above)  \$ 4/62	The second secon
H. Overpayment carried forward \$(	)
The SIPC member submitting this form and the person by whom it is executed represent thereby that all information contained herein is true, correct and complete.  Dated the 15 day of February, 2012.  This form and the assessment payment is due 60 days after the end of the fiscal years period of not less than 6 years, the latest 2 years in an easily accessible place.	tional Francial Services acceptation, Parinership or other organization)  Vermelo (Authorized Signature)  (Title)  tar. Retain the Working Copy of this form
Dates:  Postmarked Received Reviewed  Calculations Documentation  Exceptions:  Disposition of exceptions:	Forward Gopy

# DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Itam No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)	Eliminate cents s 3, 815, 786
<ul> <li>2b. Additions:         <ul> <li>(1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above.</li> </ul> </li> </ul>	
(2) Net loss from principal transactions in securities in trading accounts.	
(3) Net loss from principal transactions in commodities in trading accounts.	
(4) Interest and dividend expense deducted in determining ilem 2a.	
(5) Net loss from management of or participation in the underwriting or distribution of securities.	
(6) Expenses other than advertising, printing, registration fees and legal fees deducted in determining net profit from management of or participation in underwriting or distribution of securities.	
(7) Net loss from securities in investment accounts.	
Total additions	<u> </u>
Deductions:     (1) Revenues from the distribution of shares of a registered open and investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security futures products.	848,216
(2) Revenues from commodity transactions.	
(3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.	
(4) Reimbursements for postage in connection with proxy solicitation.	
(5) Net gain from securities in investment accounts.	
(6) 100% of commissions and markups earned from transactions in (I) certificates of deposit and (II) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date.	
(7) Direct expenses of printing advertising and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act).	
(8) Other revenue not related either directly or indirectly to the securities business. (See Instruction C):	
(Deductions in excess of \$100,000 require documentation)	
(9) (i) Total interest and dividend expense (FOCUS Line 22/PART HA Line 13, Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.  (ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).	
Enter the greater of line (i) or (ii)	-
Total deductions	848.216
2d. SIPC Net Operating Revenues	2967.570
2e. General Assessment @ .0025	74/8
volution all properties of the contract of the	(to page 1, line 2.A.)