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

SEC FILE NUMBER  
8-69416

NON-CONFIDENTIAL PUBLIC

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 1/01/17 AND ENDING 12/31/17  
MM/DD/YY MM/DD/YY

**A. REGISTRANT IDENTIFICATION**

|   |  |
|---|--|
| NAME OF BROKER-DEALER: Marble Two Capital, LLC  | OFFICIAL USE ONLY<br>FIRM I.D. NO.             |
| ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)<br>11766 Wilshire Blvd., Suite 1230<br>(No. and Street) |  |
| Los Angeles CA<br>(City) (State)  | 90025<br>(Zip Code)                            |
| NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT<br>Vijay A. Chevli                                | 310-453-5706<br>(Area Code - Telephone Number) |

**B. ACCOUNTANT IDENTIFICATION**

|  |
|--|
| INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*<br>Elizabeth Tractenberg, CPA<br>(Name - if individual, state last, first, middle name) |
| 2367 Clubhouse Drive Rocklin CA 95765<br>(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)

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.

SEC 1410 (06-02)



DM

OATH OR AFFIRMATION

I, Vijay A. Chevli CHEVLI, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of Marbel Two Capital, LLC, as of December 31, 2017, 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:

None

*Vijay A. Chevli*

Signature

MANAGER

Title

SEE ATTACHED INITIAL A.A.  
NOTARIZED CERTIFICATE

*Aldo Aldana*

Notary Public

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~~ **Cash Flows.**
- (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 15c3-1 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).

**CALIFORNIA JURAT WITH AFFIANT STATEMENT**

**GOVERNMENT CODE § 8202**

- See Attached Document (Notary to cross out lines 1-6 below)
- See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

~~\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_~~

Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California  
 County of Los Angeles

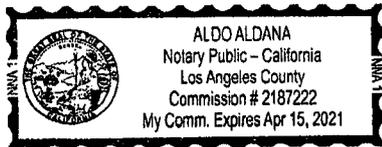
Subscribed and sworn to (or affirmed) before me  
 on this 20 day of February, 2018  
 by Date Month Year

(1) Vijay A. Chevli

(and (2) \_\_\_\_\_),  
 Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence  
 to be the person(s) who appeared before me.

Signature [Handwritten Signature]  
 Signature of Notary Public



Seal  
 Place Notary Seal Above

**OPTIONAL**

*Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.*

**Description of Attached Document**

Title or Type of Document: Annual Audited Report Document Date: \_\_\_\_\_

Number of Pages: \_\_\_\_\_ Signer(s) Other Than Named Above: \_\_\_\_\_

**MARBLE TWO CAPITAL, LLC**  
REPORT PURSUANT TO RULE 17a-5(d)  
YEAR ENDED DECEMBER 31, 2017

**Elizabeth Tractenberg, CPA**  
2367 Clubhouse Drive  
ROCKLIN, CALIFORNIA 95765  
916/259-1666 – Fax 323/517-2625  
[elizabeth@tractenberg.net](mailto:elizabeth@tractenberg.net)  
PCAOB # 3621

**Report of Independent Registered Public Accounting Firm**

To the Member  
Marble Two Capital, LLC  
Santa Barbara, CA 93101

**Opinion on the Financial Statements**

I have audited the accompanying statement of financial condition of Marble Two Capital, LLC, as of December 31, 2017 and the related statements of income, changes in member's equity, and cash flows for the year then ended, and the related notes and Schedule I, Statement of Net Capital Under Rule 15c3-1, Schedule II, Determination of Reserve Requirements Under Rule 15c3-3(exemption), and Schedule III, Information Relating to Possession or Control Requirements Under Rule 15c3-3 (exemption) (collectively referred to as the "financial statements"). In my opinion, the financial statements present fairly, in all material respects, the financial position of Marble Two Capital, LLC as of December 31, 2017, and the results of its operations and its cash flows for the year then ended in conformity with accounting principles generally accepted in the United States of America.

**Basis for Opinion**

These financial statements are the responsibility of Marble Two Capital, LLC's management. My responsibility is to express an opinion on Marble Two Capital, LLC's financial statements based on my audit. I am a public accounting firm registered with the Public Company Accounting Oversight Board (United States) ("PCAOB") and I am required to be independent with respect to Marble Two Capital, LLC in accordance with U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

I conducted my audit in accordance with the standards of the PCAOB. Those standards require that I 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. My 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. My 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. I believe that my audit provides a reasonable basis for my opinion.



Elizabeth Tractenberg, CPA  
I have served as Marble Two Capital, LLC's auditor since 2013.  
Rocklin, CA  
January 19, 2018

MARBLE TWO CAPITAL, LLC  
Statement of Financial Condition  
December 31, 2017

**ASSETS**

|              |                  |
|--------------|------------------|
| Cash         | \$ 15,540        |
| Other assets | <u>5,250</u>     |
| Total Assets | <u>\$ 20,790</u> |

**LIABILITIES AND MEMBER'S EQUITY**

|  |                  |
|--|------------------|
| Accounts payable and accrued liabilities | \$ 67            |
| Member's equity                          | <u>20,723</u>    |
| Total Liabilities and Member's Equity    | <u>\$ 20,790</u> |

MARBLE TWO CAPITAL, LLC  
Notes to Financial Statements  
December 31, 2017

Note 1 - Summary of Significant Accounting Policies

**Business Operations**

Marble Two Capital, LLC (the "Company") operates as a broker-dealer in securities registered with the Securities and Exchange Commission ("SEC") under Rule 15c3-3(k)(2)(i). Pursuant to NASD Rule 1014, the Company's New Member Application was granted by FINRA on June 23, 2015. The Company operates as a Delaware Limited Liability Company. A member of the Company has limited personal liability for obligations or debts of the entity. The Company was organized in April 2012 and is a member of Financial Industry Regulatory Authority ("FINRA"). The Company's customers are located throughout the United States.

The Company provides M&A advisory and investment banking services as well as private placements and does business under Innovus Capital.

**Commission Income**

Commission income related to the capital raising efforts for private and accredited clients is recognized when earned.

**Receivable from Commissions**

Commissions receivable are generally collected in full in the month following their accrual. As such, management has not recorded an allowance for doubtful accounts on these receivables. Management records an allowance for bad debts based on a collectability review of specific accounts. Any receivables deemed uncollectible are written off against the allowance.

**Income Taxes**

The Company is not subject to federal income taxes; an individual member of the Company is required to report their distributive share of the Company's realized income, gain, loss, deductions, or credits on their individual income tax returns. The State of California has similar treatment, although there exists a provision for a gross receipts tax and a minimum Franchise Tax of \$800.

The accounting principles generally accepted in the United States of America provide accounting and disclosure guidance about positions taken by an organization in its tax returns that might be uncertain. Management has considered its tax positions and believes that all of the positions taken by the Company in its Federal and State organization tax returns are more likely than not to be sustained upon examination. The Company is subject to examinations by U.S. Federal and State tax authorities, generally for three years after they are filed.

**Use of Estimates**

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America ("U.S. GAAP") requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

MARBLE TWO CAPITAL, LLC  
Notes to Financial Statements  
December 31, 2017

Note 2 - Fair Value

Unless otherwise indicated, the fair values of all reported assets and liabilities that represent financial instruments (none of which are held for trading purposes) approximate the carrying values of such amounts.

Note 3 - 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. Net capital and the related net capital ratio may fluctuate on a daily basis.

At December 31, 2017, the Company had net capital of approximately \$15,473 and net capital requirements of \$5,000. The Company's ratio of aggregate indebtedness to net capital was .43 to 1.0. The Securities and Exchange Commission permits a ratio of no greater than 15.0 to 1.0.

Capital distributions to a member of the Company can be made under a capital distribution policy approved by the Company's managing member. Periodic distributions approved by the Company's managing member are made to enable a member of the Company to pay federal income taxes on profits, among other purposes.

Note 4 - Possession or Control Requirements

The Company does not have any possession or control of customer funds or securities. There were no material inadequacies in the procedures followed in adhering to the exemptive provisions of (SEC) Rule 15c3-3(k)(2)(i) by promptly transmitting all customer funds and securities to the clearing broker who carries the customer accounts.

Note 5 - Commitments and Contingencies

None.

Note 6 - Related Party Transactions

The Company and an affiliate (the "Affiliate") are under common control and the existence of that control creates operating results and financial position significantly different than if the companies were autonomous. During fiscal year 2017, the Affiliate provided office space and other expenses to the Company under an expense sharing agreement. During 2017 the Company paid \$5,580 to the affiliate under this agreement. At December 31, 2017 the Company had a \$0 payable to the affiliate.

Expenses

|  |                 |
|--|-----------------|
| Legal and Professional                       | \$ 600          |
| Marketing and Entertainment (other expenses) | 1,200           |
| Office and Administrative (other expenses)   | 1,380           |
| Rent Expense (other expenses)                | 2,400           |
|  | <u>\$ 5,580</u> |

MARBLE TWO CAPITAL, LLC  
Notes to Financial Statements  
December 31, 2017

Note 7 - Subsequent Event

Management has reviewed the results of operations for the period of time from its year end December 31, 2017 through January 19, 2018, the date the financial statements were available to be issued, and has determined that no adjustments are necessary to the amounts reported in the accompanying financial statements nor have any subsequent events occurred, the nature of which would require disclosure.

*Non Confidential, Public Copy*

Supplemental Information  
Pursuant to Rule 17a-5  
of the Securities Exchange Act of 1934  
as of  
December 31, 2017

**Schedule II**

**MARBLE TWO CAPITAL, LLC**  
**Computation for Determination of Reserve**  
**Requirements Pursuant to Rule 15c3-3**  
**As of December 31, 2017**

A computation of reserve requirement is not applicable to Marble Two Capital, LLC as the Company qualifies for exemption under Rule 15c3-3 under section (k)(2)(i).

**Schedule III**

**MARBLE TWO CAPITAL, LLC**  
**Information Relating to Possession or Control**  
**Requirements under Rule 15c3-3**  
**As of December 31, 2017**

Information relating to possession or control requirements is not applicable to Marble Two Capital, LLC as the Company qualifies for exemption under Rule 15c3-3 under section (k)(2)(i).

**Elizabeth Tractenberg, CPA**  
2367 Clubhouse Drive  
ROCKLIN, CALIFORNIA 95765  
916/259-1666 – Fax 323/517-2625  
elizabeth@tractenberg.net  
PCAOB # 3621

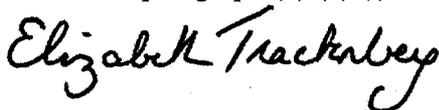
**Report of Independent Registered Public Accounting Firm – Exemption Report**

To the Member  
Marble Two Capital, LLC  
Santa Barbara, CA 93101

I have reviewed management's statements, included in the accompanying Marble Two Capital, LLC (the "Company") Exemption Report in which (1) Marble Two Capital, LLC identified the following provisions of 17C.F.R. §15c3-3(k) under which the Marble Two Capital, LLC claimed an exemption from 17 C.F.R. §240.15c3-3: ((k) (2) (i)) ("exemption provisions"), and (2) the Marble Two Capital, LLC stated that the Marble Two Capital, LLC met the identified exemption provisions throughout the most recent fiscal year without exception. The Marble Two Capital, LLC's management is responsible for compliance with the exemption provisions and its statements.

My 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 Marble Two Capital, LLC's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, I do not express such an opinion.

Based on my review, I am not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k) (2) (i) of Rule 15c3-3 under the Securities Exchange Act of 1934.



Elizabeth Tractenberg, CPA  
Rocklin, CA  
January 19, 2018

**MARBLE TWO CAPITAL, LLC**  
**Exemption Report Pursuant to Amendments to Rule 17a-5:**  
**Reports to be Made by Certain Brokers & Dealers**

To the best knowledge and belief of Marble Two Capital, LLC, the firm is exempt from Customer Protection Rule 15c3-3 and has been exempt throughout the most recent fiscal year ending December 31, 2017.

The firm claims an exemption from Rule 15c3-3 under the provision in paragraph (k)(2)(I) (Special Account for the Exclusive Benefit of Customers will be maintained as warranted).

The firm has met the identified exemption provision throughout the most recent fiscal year without exception.

  
\_\_\_\_\_  
Vijay A. Chevli, Chief Executive Officer  
Marble Two Capital, LLC

\_\_\_\_\_  
January 8, 2018