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

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FACING PAGE

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

REPORT FOR THE PERIOD BEGINNING 01/01/2019 AND ENDING 12/31/2019  
MM/DD/YY MM/DD/YY

**A. REGISTRANT IDENTIFICATION**

NAME OF BROKER-DEALER: **CULLEN INVESTMENT GROUP, LTD**

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

**1404 SOUTH COLLEGE ROAD**

OFFICIAL USE ONLY
FIRM I.D. NO.

(No. and Street)

**LAFAYETTE**

**LOUISIANA**

**70503**

(City)

(State)

(Zip Code)

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

DAVID C. BORDES

(Area Code - Telephone Number)

**B. ACCOUNTANT IDENTIFICATION**

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report\*

**LAPORTE, A PROFESSIONAL ACCOUNTING CORPORATION**

(Name - if individual, state last, first, middle name)

**5100 VILLAGE WALK, STE 300 COVINGTON**

**LA**

**70433**

(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)

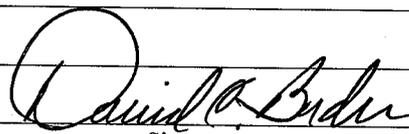
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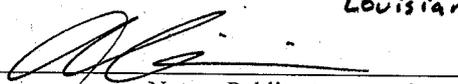
### OATH OR AFFIRMATION

I, DAVID C. BORDES, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of CULLEN INVESTMENT GROUP, LTD, as of DECEMBER 31, 2019, 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

President  
Title

Thus done and signed in Lafayette,  
Louisiana, this 26th  
day of February, 2020

  
Notary Public Anne Gaiennie Barroll # 01896

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 15c3-1 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).

**CULLEN INVESTMENT GROUP, LTD.**

Audit of Financial Statements

December 31, 2019

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Baton Rouge, LA 70810  
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LaPorte.com

## Report of Independent Registered Public Accounting Firm

To the Stockholders and Board of Directors  
Cullen Investment Group, Ltd.

### Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Cullen Investment Group, Ltd. (the Company) as of December 31, 2019, and the related statements of operations, changes in stockholders' equity, changes in liabilities subordinated to claims of general creditors, and cash flows for the year then ended, and the related notes to the financial statements (collectively, the financial statements). In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the Company as of December 31, 2019, 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 the Company's management. Our responsibility is to express an opinion on the Company's financial statements based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to the Company in accordance with U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB. Those standards require that we 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.

Our 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. Our 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. We believe that our audit provides a reasonable basis for our opinion.

LOUISIANA • TEXAS

An Independently Owned Member, RSM US Alliance  
RSM US Alliance member firms are separate and independent businesses and legal entities that are responsible for their own acts and omissions, and each is separate and independent from RSM US LLP. RSM US LLP is the U.S. member firm of RSM International, a global network of independent audit, tax, and consulting firms. Members of RSM US Alliance have access to RSM International resources through RSM US LLP but are not member firms of RSM International.

**Supplemental Information**

The supplementary information contained in Schedules I, II, III, and IV (the Supplemental Information) has been subjected to audit procedures performed in conjunction with the audit of Cullen Investment Group Ltd.'s financial statements. The Supplemental Information is the responsibility of Cullen Investment Group Ltd.'s management. Our audit procedures included determining whether the Supplemental Information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the Supplemental Information. In forming our opinion on the Supplemental Information, we evaluated whether the Supplemental Information, including its form and content, is presented in conformity with 17 C.F.R. § 240.17a-5. In our opinion, the supplementary information contained in Schedules I, II, III, and IV is fairly stated, in all material respects, in relation to the financial statements as a whole.



A Professional Accounting Corporation

We have served as the Company's auditor since 2009.

Baton Rouge, LA  
February 20, 2020

**CULLEN INVESTMENT GROUP, LTD.**  
**Statement of Financial Condition**  
**December 31, 2019**

<b>Assets</b>	
Cash and Cash Equivalents	\$ 476,008
Cash Held by Clearing Broker, Restricted	41
Receivable from Clearing Broker	8,538
Investment Securities Owned, Held at Clearing Broker	
Marketable - Unrestricted, at Market Value	212,705
Investment Securities Owned, Held at Clearing Broker	
Marketable - Restricted, at Market Value	25,100
Property and Equipment, Net of Accumulated Depreciation of \$18,872	26,620
Other Assets	22,817
Intangible Asset, Net of Accumulated Amortization of \$145,200	<u>580,800</u>
<b>Total Assets</b>	<b><u>\$ 1,352,629</u></b>
<b>Liabilities and Stockholders' Equity</b>	
<b>Liabilities</b>	
Accounts Payable and Accrued Expenses	\$ 135,965
Commitments and Contingencies	<u>-</u>
<b>Total Liabilities</b>	<b><u>135,965</u></b>
<b>Stockholders' Equity</b>	
Common Stock, 200,000 Shares Authorized, 100,000 shares Outstanding, No Par Value	10,000
Paid-In Capital	745,774
Retained Earnings	<u>460,890</u>
<b>Total Stockholders' Equity</b>	<b><u>1,216,664</u></b>
<b>Total Liabilities and Stockholders' Equity</b>	<b><u>\$ 1,352,629</u></b>

The accompanying notes are an integral part of these financial statements.

**CULLEN INVESTMENT GROUP, LTD.**  
**Statement of Operations**  
**For the Year Ended December 31, 2019**

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<b>Revenues</b>	
Investment Advisory Fees	\$ 2,356,894
Commissions	159,717
Unrealized Gain on Investment Securities	13,635
Dividend Income	1,895
Interest Income	1,126
Miscellaneous Income	1,076
	<hr/>
<b>Total Revenues</b>	<b>2,534,343</b>
	<hr/>
<b>Expenses</b>	
Employee Compensation and Benefits	754,583
General and Administrative Expenses	313,775
Clearing Cost	68,372
Occupancy	58,680
	<hr/>
<b>Total Expenses</b>	<b>1,195,410</b>
	<hr/>
<b>Net Income</b>	<b>\$ 1,338,933</b>

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The accompanying notes are an integral part of these financial statements.

**CULLEN INVESTMENT GROUP, LTD.**  
**Statement of Changes in Stockholders' Equity**  
**For the Year Ended December 31, 2019**

	<u>Common Stock</u>		<u>Paid-In Capital</u>	<u>Retained Earnings</u>	<u>Total</u>
	<u>Shares Outstanding</u>	<u>Amount</u>			
<b>Balance, December 31, 2018</b>	100,000	\$ 10,000	\$ 745,774	\$ 321,957	\$ 1,077,731
Net Income	-	-	-	1,338,933	\$ 1,338,933
Distributions	-	-	-	(1,200,000)	\$ (1,200,000)
<b>Balance, December 31, 2019</b>	<u>100,000</u>	<u>\$ 10,000</u>	<u>\$ 745,774</u>	<u>\$ 460,890</u>	<u>\$ 1,216,664</u>

The accompanying notes are an integral part of these financial statements.

**CULLEN INVESTMENT GROUP, LTD.**  
**Statement of Changes in Liabilities Subordinated to**  
**Claims of General Creditors**  
**For the Year Ended December 31, 2019**

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<b>Subordinated Borrowings at December 31, 2018</b>	<b>\$ -</b>
Increases	-
Decreases	-
<b>Subordinated Borrowings at December 31, 2019</b>	<b><u><u>\$ -</u></u></b>

**CULLEN INVESTMENT GROUP, LTD.**  
**Statement of Cash Flows**  
**For the Year Ended December 31, 2019**

<b>Cash Flows From Operating Activities</b>	
Net Income	\$ 1,338,933
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
Unrealized Gain on Investment Securities Owned, Held at Clearing Broker, Marketable - Unrestricted	(13,635)
Depreciation and Amortization	51,724
Decrease in Receivable from Clearing Broker	63
Increase in Other Assets	(8,635)
Net Increase in Investments Securities, Owned, Held at Clearing Broker, Marketable - Unrestricted	(1,738)
Increase in Investments Securities, Owned, Held at Clearing Broker, Marketable - Restricted	(25,100)
Increase in Accounts Payable and Accrued Expenses	448
	<u>1,342,060</u>
<b>Net Cash Provided by Operating Activities</b>	
<b>Cash Flows from Investing Activities</b>	
Purchases of Property and Equipment	<u>(16,978)</u>
	<u>(16,978)</u>
<b>Net Cash Used in Investing Activities</b>	
<b>Cash Flows from Financing Activities</b>	
Distributions to Stockholders	<u>(1,200,000)</u>
	<u>(1,200,000)</u>
<b>Net Cash Used in Financing Activities</b>	
<b>Net Increase in Cash, Cash Equivalents, and Restricted Cash</b>	125,082
<b>Cash, Cash Equivalents, and Restricted Cash - Beginning of Year</b>	<u>350,967</u>
<b>Cash, Cash Equivalents, and Restricted Cash - End of Year</b>	<u>\$ 476,049</u>
<b>Cash, Cash Equivalents, and Restricted Cash by Category Within the Statement of Financial Condition:</b>	
Cash	\$ 476,008
Cash and Securities Held by Clearing Broker, Restricted	41
	<u>41</u>
<b>Total Cash, Cash Equivalents, and Restricted Cash</b>	<u>\$ 476,049</u>

The accompanying notes are an integral part of these financial statements.

## **CULLEN INVESTMENT GROUP, LTD.**

### **Notes to Financial Statements**

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#### **Note 1. Summary of Significant Accounting Policies**

##### **Business of the Company**

Cullen Investment Group, Ltd. (the Company) was incorporated under the provisions of the laws of the State of Louisiana on October 7, 1986. The Company is a broker/dealer registered with the Securities and Exchange Commission (SEC) pursuant to the Securities Exchange Act of 1934. The Company operates pursuant to the exemptive provisions of paragraph k(2)(ii) of the Securities and Exchange Commission Rule 15(c)3-3 and does not hold customer funds or securities. The Company is a member of the Financial Industry Regulatory Authority and is registered as a securities dealer with the State of Louisiana. The Company's customers are principally located in Lafayette, Louisiana and the surrounding area.

##### **Cash and Cash Equivalents**

For purposes of the statement of cash flows, the Company considers all highly liquid investments purchased with an original maturity of three months or less to be cash equivalents.

##### **Investment Securities**

Marketable securities are valued at market value and securities not readily marketable are valued at fair value as determined by management. The resulting difference between cost and market (or fair value) is included in income.

##### **Revenue Recognition**

Revenue from contracts with customers is recognized as the Company satisfies its performance obligations by transferring the promised services to the customers. A service is transferred to a customer as these are rendered. A performance obligation may be satisfied over time or at a point in time. Revenue from a performance obligation satisfied at a point in time is recognized at the point in time that the Company determines the customer obtains control over the promised service.

The following provides detailed information on the recognition of the Company's revenue from contracts with customers:

- Trading commission revenue: revenue is recognized at trade date, as it is when the performance obligation is met.
- Advisory fees: services are billed at the beginning of the quarter based on the total value of the assets under management by the Company. Revenue is deferred and recognized over time as the performance obligation is met.
- Interest income: the Company recognizes interest income related to the short-term investments on an accrual basis.

The revenue guidance does not apply to other revenue sources such as unrealized gain on investment securities, dividend income, or interest income as these sources of revenue do not have a contract with customers.

##### **Receivable from Clearing Broker**

Accounts receivable from clearing broker represents uncollected commissions and fees due from the Company's clearing broker.

## CULLEN INVESTMENT GROUP, LTD.

### Notes to Financial Statements

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#### Note 1. Summary of Significant Accounting Policies (Continued)

##### Property and Equipment

Property and equipment are stated at cost, less accumulated depreciation computed on the straight-line method over the estimated useful lives of the assets, which range from 5 to 7 years. Depreciation charged to operations amounted to \$3,324 for the year ended December 31, 2019.

Major categories of property and equipment at December 31, 2019 are as follows:

Furniture & Fixtures	\$	7,035
Equipment		37,457
Leasehold Improvements		1,000
		<u>45,492</u>
Less: Accumulated Depreciation		(18,872)
	\$	<u>26,620</u>

##### Intangible Asset

The Company amortizes its customer relationship intangible on the straight-line method over 15 years unless a shorter useful life is more appropriate.

The intangible asset is reviewed annually for impairment or when events or circumstances indicate that its carrying amount may not be recoverable. No impairment was recorded in 2019.

##### Income Taxes

The Company has elected S corporation status effective October 1, 2004. Earnings and losses after that date are included in the personal income tax returns of the stockholders. Therefore, no provision or liability for federal income taxes has been included in the financial statements.

##### 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 the reported amounts of 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.

##### Leases

The Company adopted a comprehensive new lease accounting standard effective January 1, 2019. The details of the significant changes to the accounting policies resulting from the adoption of the new standard are described under adopted accounting standards. The Company adopted the standard using the optional modified retrospective transition method; accordingly, information as of December 31, 2018 and for the year ended December 31, 2018 have not been adjusted and continue to be reported under the previous lease standard. Under the new lease standard, assets and liabilities that arise from all leases are required to be recognized on the balance sheet for lessees. Previously, only capital leases, which are now referred to as finance leases, were recorded on the

## CULLEN INVESTMENT GROUP, LTD.

### Notes to Financial Statements

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#### Note 1. Summary of Significant Accounting Policies (Continued)

##### Leases (Continued)

balance sheet. The adoption of this standard did not result in the recognition of operating lease right-of-use assets and operating lease liabilities on the statement of condition as of January 1, 2019. The adoption of this standard had no impact on the Company's operations for the year ended December 31, 2019.

##### Adopted Accounting Standards

Leases: Effective January 1, 2019, the Company adopted an accounting standard update issued by the Financial Accounting Standards Board (FASB) related to the accounting treatment for leases (ASC 842), which requires lessees to record assets and liabilities that arise for all leases on their balance sheet and expanded financial statement disclosures for both lessees and lessors. The Company adopted this standard using the optional modified retrospective transition method. As such, financial statements have not been restated and continue to be reported under the lease standard in effect during those periods.

The adoption of this standard had no impact on the Company's statement of condition or the statement of operations for the year ended December 31, 2019.

##### Recent Accounting Pronouncements

In June 2016, the FASB issued ASU 2016-13 to update the methodology used to measure current expected credit losses ("CECL"). This ASU applies to financial assets measured at amortized cost, including trade receivables as well as certain off-balance sheet credit exposures. This ASU replaces the current incurred loss impairment methodology with a methodology to reflect CECL and requires consideration of a broader range of reasonable and supportable information to explain credit loss estimates. The guidance must be adopted using a modified retrospective transition method through a cumulative-effect adjustment to retained earnings in the period of adoption. This ASU will be effective beginning January 1, 2020. The Company does not expect this guidance to have a significant impact on the financial statements and related disclosures.

#### Note 2. Agreement with Clearing Organization

The Company utilizes Raymond James & Associates, Inc. as its clearing broker. Terms of the agreement with the clearing organization call for the Company to maintain compensating balances of \$25,000. At December 31, 2019, \$41 of cash and \$25,100 of securities are restricted for that purpose. In addition, terms of the agreement require the Company to maintain net capital equal to the greater of the amount required by the SEC net capital rules applicable to a correspondent introducing broker or \$100,000. At December 31, 2019, the Company had net capital of \$564,004, which was \$464,004 in excess of its required net capital of \$100,000.

#### Note 3. Intangible Assets

In connection with a merger in 2017, the Company assigned \$726,000 to intangible assets attributable to the customer database from SR Newco.

## **CULLEN INVESTMENT GROUP, LTD.**

### **Notes to Financial Statements**

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#### **Note 3. Intangible Assets (Continued)**

Related amortization expense and accumulated amortization for the year ended December 31, 2019 was \$48,400 and \$145,200, respectively. The estimated future amortization expense for each of the next five years is \$48,400. The Company has evaluated its intangible asset and no impairment was identified as of December 31, 2019.

#### **Note 4. Off-Balance Sheet Risk and Concentration of Credit Risk**

The Company periodically maintains cash in bank accounts in excess of federally insured limits. The Company has not experienced any losses and does not believe that significant credit risk exists as a result of this practice.

The Company is responsible to its clearing broker for payment of all transactions executed both on its behalf and on behalf of its customers. Therefore, the Company is exposed to off-balance sheet risk in the event a customer cannot fulfill its commitment and the clearing broker must purchase or sell a financial instrument at prevailing market prices.

The Company and its clearing broker seek to control risk associated with customer transactions through daily monitoring to assure margin collateral is maintained under regulatory and internal guidelines.

The Company is further exposed should its clearing broker, who clears all of the Company's transactions and holds its securities, be unable to fulfill its obligations. The Company monitors the credit standing of its clearing broker and all counterparties with which it conducts business.

#### **Note 5. Commitments and Contingencies**

The Company clears all customers' securities transactions through a clearing broker, on a fully disclosed basis, which, in accordance with accounting principles generally accepted in the United States of America, are not included on the statement of financial condition. These transactions are referred to as "off-statement of financial condition commitments" and differ from the Company's statement of financial condition activities in that they do not give rise to funded assets or liabilities. The Company receives a commission for initiating such transactions for its customers. Initiating these trades for its customers involves various degrees of credit and market risk in excess of amounts recognized on the statement of financial condition. The Company minimizes its exposure to loss under these commitments by subjecting the customer accounts to credit approval and monitoring processes.

Once a trade is executed, a customer is allowed two business days to settle the transaction by payment of the settlement price (when purchasing securities) or the delivery of the securities (when selling securities). The Company is required by law to immediately complete a securities transaction when a customer fails to settle. The Company is at risk for any loss realized in completing transactions for its customers. All unsettled transactions at December 31, 2019, were subsequently settled by customers without loss to the Company, or open commitments were adequately collateralized.

## CULLEN INVESTMENT GROUP, LTD.

### Notes to Financial Statements

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#### **Note 5. Commitments and Contingencies (Continued)**

The Company is subject to various legal proceedings and regulatory actions in the ordinary course of its business. The outcomes of any legal and regulatory matters are subject to many uncertainties and, therefore, cannot be predicted. In the opinion of management, any pending legal and regulatory actions will not have a material effect on the financial position, results of operations, or cash flows of the Company.

The Company leases office space under two leases expiring in 2020. Future minimum rental payments due under these arrangements total \$12,730 and \$46,200 for the year ending December 31, 2020.

Rent expense for 2019, totaled \$58,680 and is included in the statement of operations under occupancy expenses.

#### **Note 6. Investment Securities**

Investment securities consist of equity securities owned and carried at market value.

The Company discloses information about the fair value of its securities in accordance with the provisions of the *Fair Value Measurement* Topic of FASB ASC 820 which, among other matters, establishes a fair value hierarchy that prioritizes the inputs to valuation techniques used to measure fair value. The three levels of the fair value hierarchy are described below:

Level 1 - Quoted prices are available in active markets for identical investments as of the reporting date. The type of investments included in Level 1 include listed equity and debt securities.

Level 2 - Pricing inputs are other than quoted prices in active markets, which are either directly or indirectly observable as of the reporting date, and fair value is determined through the use of models or other valuation methodologies. Investments which are generally included in this category include less liquid and restricted equity securities and over-the-counter derivatives.

Level 3 - Pricing inputs are unobservable for the investment and include situations where there is little, if any, market activity for the investment. The inputs into the determination of fair value require significant management judgment or estimation. Investments that are included in this category generally include general and limited partnership interests in corporate private equity funds, and funds of hedge funds.

In some instances, the inputs used to measure fair value may fall into different levels of the fair value hierarchy. In such instances, an investment's level within the fair value hierarchy is based on the lowest level of input that is significant to the fair value measurement.

## CULLEN INVESTMENT GROUP, LTD.

### Notes to Financial Statements

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#### Note 6. Investment Securities (Continued)

The preceding methods described may produce a fair value calculation that may not be indicative of the net realizable value or reflective of future fair values. Furthermore, although the Company believes its valuation methods are appropriate and consistent with other market participants, the use of different methodologies or assumptions to determine the fair value of certain financial instruments could result in a different fair value measurement at the reporting date. There have been no changes in the methodologies used during the year ended December 31, 2019.

The valuation of the Company's investments by the above fair value hierarchy at December 31, 2019, is as follows:

	Total	Level 1	Level 2	Level 3
<b>Assets</b>				
Equity Securities - Unrestricted				
Financial Industry	\$ 212,705	\$ 212,705	-	-
Equity Securities - Restricted				
Financial Industry	25,100	25,100	-	-
Total	\$ 237,805	\$ 237,805		

#### Note 7. Related Party Transactions

The Company leased office space from related parties for the period January 2019 to December 2019. Rent expense paid to Red Drum Investments and Cullen Properties totaled \$12,480 and \$46,200, respectively, for the year ended December 31, 2019. The Company did not have outstanding balances to the related parties as of December 31, 2019.

#### Note 8. Retirement Plans

The Company maintains a defined contribution money purchase profit sharing plan, which covers all employees meeting certain age and length of service requirements. Contributions are determined annually by the Company. The Company may contribute up to 25% of eligible compensation, subject to statutory limitations. Employer contributions to the plan totaled \$126,268 for the year ended December 31, 2019. The Company contributed at an average rate of 21% of total compensation for the year ended December 31, 2019.

#### Note 9. Income Taxes

Accounting principles generally accepted in the United States of America provide accounting and disclosure guidance about positions taken by an entity in its tax returns that might be uncertain. The Company believes that it has appropriate support for any tax positions taken, and management has determined that there are no uncertain tax positions that are material to the financial statements.

## CULLEN INVESTMENT GROUP, LTD.

### Notes to Financial Statements

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#### Note 9. Income Taxes (Continued)

Penalties and interest assessed by income taxing authorities, if any, would be included in income tax expense.

#### Note 10. Net Capital Requirements

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (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, 2019, the Company had net capital of \$564,004, which was \$464,004 in excess of its required net capital of \$100,000. The Company's ratio of aggregate indebtedness to net capital was .24 to 1 at December 31, 2019.

#### Note 11. Revenues from Contracts with Customers

The following table presents the Company's total revenues separated from revenues from contracts with customers and other sources of revenues for the year ended December 31, 2019:

Revenues from Contracts with Customers	
Investment Advisory Fees	\$2,356,894
Commissions	159,717
Total Revenues from Contracts with Customers	<u>2,516,611</u>
Other Sources of Revenue	
Unrealized Gain on Investment Securities	13,635
Dividend Income	1,895
Interest Income	1,126
Miscellaneous Income	1,076
	<u>25,732</u>
Total	<u>\$2,534,343</u>

Revenue from contracts with customers is recognized as the Company satisfies its performance obligations by transferring the promised services to the customers. A service is transferred to a customer as these are rendered. A performance obligation may be satisfied over time or at a point in time. Revenue from a performance obligation satisfied at a point in time is recognized at the point in time that the Company determines the customer obtains control over the promised service. The amount of revenue recognized reflects the consideration the Company expects to be entitled to in exchange for those promised services (the "transaction price"). In determining the transaction price, the Company considers multiple factors, including the effects of variable consideration. Variable consideration is included in the transaction price only to the extent it is probable that a significant reversal in the amount of cumulative revenue recognized will not occur when the uncertainties with respect to the amount are resolved. In determining when to include variable consideration in the transaction price, the Company considers the range of possible outcomes, the predictive value of the

## CULLEN INVESTMENT GROUP, LTD.

### Notes to Financial Statements

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#### Note 11. Revenues from Contracts with Customers (Continued)

Company's past experiences, the time period of when uncertainties expect to be resolved and the amount of consideration that is susceptible to factors outside of the Company's influence, such as market volatility or the judgment and actions of third parties.

The following provides detailed information on the recognition of the Company's revenue from contacts with customers:

**Trading commission revenue:** the Company provides its clients with placement services. These services include providing clients with services to negotiate and settle a transaction on behalf of its customers. These fees are recognized at a point in time on trade date. Costs associated with placement and transaction fees are expensed as incurred as part of the performance obligation to provide these services.

**Advisory fees:** revenues from advisory services primarily consist of fees generated in connection with account management of the customers. Advisory fees are recognized over time as these services are rendered, which is when the Company's customers receive and consume the benefits provided. No portion of the advisory fees the Company receives are considered variable nor are they contingent upon a future event or transaction. Payment for investment advisory services are due on a quarterly basis and over the course of the engagement. Expenses associated with the investment advisory fees are expensed as incurred.

**Information on revenue recognized from past performance:** the Company does not disclose information about contracts that have an original expected duration of one year or less.

**Contract balance:** the timing of the revenue recognition may differ from the timing of payment by the Company's customers. The Company records a receivable when revenue is recognized prior to payment and the Company has an unconditional right to payment. Alternatively, when payment precedes the provision of the related services, the Company records deferred revenue until the performance obligations are satisfied.

The Company's receivable related to revenues from contracts with customers is \$0 at December 31, 2019. Contract receivables were \$0 at the beginning of the year.

Deferred revenue at December 31, 2019 was \$0. During the year ended December 31, 2019, the Company did not recognize revenue that was recorded as deferred revenue at the beginning of the year as this balance was \$0.

#### Note 12. Evaluation of Subsequent Events

FASB ASC Topic 855, *Subsequent Events*, establishes general standards of accounting for and disclosure of events that occur after the balance sheet date but before financial statements are issued or are available to be issued. Specifically, it sets forth the period after the balance sheet date during which management of a reporting entity should evaluate events or transactions that may occur for potential recognition or disclosure in

**CULLEN INVESTMENT GROUP, LTD.**

**Notes to Financial Statements**

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**Note 12. Evaluation of Subsequent Events (Continued)**

the financial statements, the circumstances under which an entity should recognize events or transactions occurring after the balance sheet date in its financial statements, and the disclosures that an entity should make about events or transactions that occurred after the balance sheet date.

In accordance with ASC 855, the Company evaluated subsequent events through February 20, 2020, the date these financial statements were available to be issued. The Company made distributions to its members on January 6, 2020 and January 8, 2020 for \$80,000 and \$320,000, respectively. The distributions did not violate the Company's net capital compliance requirements. There were no other material subsequent events that required recognition or additional disclosure in these financial statements.

**CULLEN INVESTMENT GROUP, LTD.**  
**Supplementary Information**

**Schedule I**  
**Computation of Net Capital Under Rule 15c3-1 of**  
**the Securities and Exchange Commission**  
**December 31, 2019**

<b>Net Capital</b>	
Total Stockholders' Equity	\$ 1,216,664
Deductions and/or Charges	
Property and Equipment, Net	(26,620)
Intangible Asset, Net	(580,800)
Other Assets	<u>(22,817)</u>
Net Capital Before Haircuts on Securities Positions	586,427
Haircuts on Securities	<u>(22,423)</u>
Net Capital	<u>\$ 564,004</u>
<b>Aggregate Indebtedness</b>	<u>\$ 135,965</u>
<b>Computation of Basic Net Capital Requirement</b>	
Net Capital Required	<u>\$ 100,000</u>
Excess of Net Capital	<u>\$ 464,004</u>
Net capital less 120% of requirement	<u>\$ 444,004</u>
Ratio: Aggregate Indebtedness to Net Capital	<u>.24 to 1</u>
<b>Reconciliation with Company's Computation</b>	
(Included in Part II of Form X-17A-5 as of December 31)	
Net Capital, as Reported in Company's Part II (Unaudited) FOCUS Report	<u>\$ 564,004</u>
Net Capital Per Above	<u>\$ 564,004</u>

**CULLEN INVESTMENT GROUP, LTD.  
Supplementary Information**

**Schedule II  
Computation for Determination of Reserve  
Requirements Under Rule 15c3-3 of  
the Securities and Exchange Commission**

Cullen Investment Group, Ltd. is exempt from the reserve requirements and the related computations for the determination thereof under paragraph k(2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934, as Cullen Investment Group, Ltd. carries no margin accounts in connection with its activities as a broker or dealer, does not otherwise hold funds or securities for or owe money or securities to customers.

During the year ended December 31, 2019, Cullen Investment Group, Ltd. has maintained its compliance with the conditions for exemption specified in paragraph k(2)(ii) of Rule 15c3-3.

**Schedule III  
Information Relating To Possession or Control  
Requirements Under Rule 15c3-3 of  
the Securities and Exchange Commission**

Cullen Investment Group, Ltd. is exempt from the reserve requirements and the related computations for the determination thereof under paragraph k(2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934, as Cullen Investment Group, Ltd. carries no margin accounts in connection with its activities as a broker or dealer, does not otherwise hold funds or securities for or owe money or securities to customers.

During the year ended December 31, 2019, Cullen Investment Group, Ltd. has maintained its compliance with the conditions for exemption specified in paragraph k(2)(ii) of Rule 15c3-3.

**Schedule IV  
Schedule of Segregation Requirements  
and Funds in Segregation for Customers' Regulated  
Commodity Futures and Options Accounts**

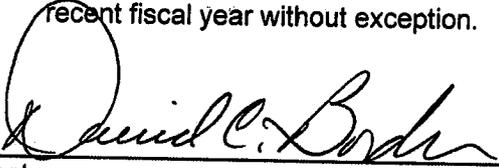
Cullen Investment Group, Ltd. is exempt from the reserve requirements and the related computations for the determination thereof under paragraph k(2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934, as Cullen Investment Group, Ltd. carries no margin accounts in connection with its activities as a broker or dealer, does not otherwise hold funds or securities for or owe money or securities to customers.

During the year ended December 31, 2019, Cullen Investment Group, Ltd. has maintained its compliance with the conditions for exemption specified in paragraph k(2)(ii) of Rule 15c3-3.

**CULLEN INVESTMENT GROUP, LTD.  
Exemption Certification  
For the Year Ended December 31, 2019**

In accordance with the requirements of SEC Rule 17a-5(d)(4)(i)-(iii), I, David C. Bordes, certify and attest, to the best of my knowledge and belief that the following statements are true and correct with regard to Cullen Investment Group, LTD.

1. Cullen Investment Group, LTD claimed an exemption from Rule 15c3-3 under provision 15c3-3(k)(2)(ii) throughout the most recent fiscal year, in that it is an introducing broker or dealer who clears all transactions with and for customers on a fully disclosed basis with a clearing broker or dealer, and it promptly transmits all customer funds and securities to the clearing broker or dealer which carries all of the accounts of such customers and maintains and preserves such books and records pertaining thereto pursuant to the requirements of §§240.17a-3 and 240.17a-4, as are customarily made and kept by a clearing broker or dealer and;
2. Cullen Investment Group, LTD met the above exemptive provisions throughout the most recent fiscal year without exception.

  
\_\_\_\_\_  
Signature

President  
\_\_\_\_\_  
Title



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Town Hall West  
10000 Perkins Rowe | Suite 200  
Baton Rouge, LA 70810  
225.296.5150 | Fax 225.296.5151  
LaPorte.com

## Review Report of Independent Registered Public Accounting Firm

To the Stockholders and Board of Directors  
Cullen Investment Group, Ltd.

We have reviewed management's statements, included in the accompanying Cullen Investment Group, Ltd. Exemption Report, in which (a) Cullen Investment Group, Ltd. identified the following provisions of 17 C.F.R. § 240.15c3-3(k) under which Cullen Investment Group, Ltd. claimed an exemption from 17 C.F.R. § 240.15c3-3: paragraph (k)(2)(ii) (the exemption provisions) and (b) Cullen Investment Group, Ltd. stated that Cullen Investment Group, Ltd. met the identified exemption provisions throughout the most recent fiscal year without exception. Cullen Investment Group, Ltd.'s management is responsible for compliance with the exemption provisions and its statements.

Our 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 Cullen Investment Group, Ltd.'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, we do not express such an opinion.

Based on our review, we are 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)(ii) of 17 C.F.R. § 240.15c3-3.

A Professional Accounting Corporation

Baton Rouge, LA  
February 20, 2020

LOUISIANA • TEXAS

An Independently Owned Member, RSM US Alliance  
RSM US Alliance member firms are separate and independent businesses and legal entities that are responsible for their own acts and omissions, and each is separate and independent from RSM US LLP. RSM US LLP is the U.S. member firm of RSM International, a global network of independent audit, tax, and consulting firms. Members of RSM US Alliance have access to RSM International resources through RSM US LLP but are not member firms of RSM International.