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**ANNUAL REPORTS  
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PART III**

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Information Required Pursuant to Rules 17a-5, 17a-12, and 18a-7 under the Securities Exchange Act of 1934

FILING FOR THE PERIOD BEGINNING 01/01/21 AND ENDING 12/31/21  
MM/DD/YY MM/DD/YY

**A. REGISTRANT IDENTIFICATION**

NAME OF FIRM: LoCorr Distributors, LLC

TYPE OF REGISTRANT (check all applicable boxes):

- Broker-dealer     Security-based swap dealer     Major security-based swap participant  
 Check here if respondent is also an OTC derivatives dealer

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use a P.O. box no.)

687 Excelsior Blvd  
(No. and Street)  
Excelsior                      MN                      55331  
(City)                                      (State)                                      (Zip Code)

PERSON TO CONTACT WITH REGARD TO THIS FILING

Jon C. Essen                      (952)767-6903                      jessen@locorrfunds.com  
(Name)                                      (Area Code – Telephone Number)                      (Email Address)

**B. ACCOUNTANT IDENTIFICATION**

INDEPENDENT PUBLIC ACCOUNTANT whose reports are contained in this filing\*

Sanville & Company  
(Name – if individual, state last, first, and middle name)  
1514 Old York Road                      Abington                      PA                      19001  
(Address)                                      (City)                                      (State)                                      (Zip Code)  
09/18/03                                      169  
(Date of Registration with PCAOB)(if applicable)                      (PCAOB Registration Number, if applicable)

<b>FOR OFFICIAL USE ONLY</b>
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\* Claims for exemption from the requirement that the annual reports be covered by the reports of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis of the exemption. See 17 CFR 240.17a-5(e)(1)(ii), if applicable.  
 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.

RMS

OATH OR AFFIRMATION

I, Jon C. Essen, swear (or affirm) that, to the best of my knowledge and belief, the financial report pertaining to the firm of LoCorr Distributors, LLC, as of December 31, 2021, is true and correct. I further swear (or affirm) that neither the company nor any partner, officer, director, or equivalent person, as the case may be, has any proprietary interest in any account classified solely as that of a customer.

[Handwritten signature]

Notary Public

Signature:

[Handwritten signature]

Title:

Chief Financial Officer



This filing\*\* contains (check all applicable boxes):

- (a) Statement of financial condition.
(b) Notes to consolidated statement of financial condition.
(c) Statement of income (loss) or, if there is other comprehensive income in the period(s) presented, a statement of comprehensive income...
(d) Statement of cash flows.
(e) Statement of changes in stockholders' or partners' or sole proprietor's equity.
(f) Statement of changes in liabilities subordinated to claims of creditors.
(g) Notes to consolidated financial statements.
(h) Computation of net capital under 17 CFR 240.15c3-1 or 17 CFR 240.18a-1, as applicable.
(i) Computation of tangible net worth under 17 CFR 240.18a-2.
(j) Computation for determination of customer reserve requirements pursuant to Exhibit A to 17 CFR 240.15c3-3.
(k) Computation for determination of security-based swap reserve requirements pursuant to Exhibit B to 17 CFR 240.15c3-3 or Exhibit A to 17 CFR 240.18a-4, as applicable.
(l) Computation for Determination of PAB Requirements under Exhibit A to § 240.15c3-3.
(m) Information relating to possession or control requirements for customers under 17 CFR 240.15c3-3.
(n) Information relating to possession or control requirements for security-based swap customers under 17 CFR 240.15c3-3(p)(2) or 17 CFR 240.18a-4, as applicable.
(o) Reconciliations, including appropriate explanations, of the FOCUS Report with computation of net capital or tangible net worth under 17 CFR 240.15c3-1, 17 CFR 240.18a-1, or 17 CFR 240.18a-2, as applicable, and the reserve requirements under 17 CFR 240.15c3-3 or 17 CFR 240.18a-4, as applicable, if material differences exist, or a statement that no material differences exist.
(p) Summary of financial data for subsidiaries not consolidated in the statement of financial condition.
(q) Oath or affirmation in accordance with 17 CFR 240.17a-5, 17 CFR 240.17a-12, or 17 CFR 240.18a-7, as applicable.
(r) Compliance report in accordance with 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
(s) Exemption report in accordance with 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
(t) Independent public accountant's report based on an examination of the statement of financial condition.
(u) Independent public accountant's report based on an examination of the financial report or financial statements under 17 CFR 240.17a-5, 17 CFR 240.18a-7, or 17 CFR 240.17a-12, as applicable.
(v) Independent public accountant's report based on an examination of certain statements in the compliance report under 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
(w) Independent public accountant's report based on a review of the exemption report under 17 CFR 240.17a-5 or 17 CFR 240.18a-7, as applicable.
(x) Supplemental reports on applying agreed-upon procedures, in accordance with 17 CFR 240.15c3-1e or 17 CFR 240.17a-12, as applicable.
(y) Report describing any material inadequacies found to exist or found to have existed since the date of the previous audit, or a statement that no material inadequacies exist, under 17 CFR 240.17a-12(k).
(z) Other:

\*\*To request confidential treatment of certain portions of this filing, see 17 CFR 240.17a-5(e)(3) or 17 CFR 240.18a-7(d)(2), as applicable.

# Sanville & Company

CERTIFIED PUBLIC ACCOUNTANTS

ROBERT F. SANVILLE, CPA  
MICHAEL T. BARANOWSKY, CPA  
JOHN P. TOWNSEND, CPA  
NATHANIEL S. HARTGRAVES, CPA

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CERTIFIED PUBLIC ACCOUNTANTS

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100 WALL STREET, 8<sup>th</sup> FLOOR  
NEW YORK, NY 10005  
(212) 709-9512

## REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member of  
LoCorr Distributors, LLC

### Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of LoCorr Distributors, LLC (the Company) as of December 31, 2021, and the related statements of operations, member's equity 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 presents fairly, in all material respects, the financial position of the Company as of December 31, 2021, 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 from material misstatement, whether due to error or fraud. The Company is not required to have, nor were we engaged to perform, an audit of its internal control over financial reporting. As part of our audit we are required to obtain an understanding of internal control over financial reporting 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.

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.

### Supplemental Information

The supplementary information contained in The Schedule I, Computation of Net Capital Pursuant to Rule 15c3-1 of the Securities and Exchange Commission, Schedule II, Computation for Determination of the Reserve Requirements Under Rule 15c3-3 of the Securities and Exchange Commission, and Schedule III, Information Relating to Possession or Control Under Rule 15c3-3 of the Securities and Exchange Commission have been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The supplemental information is the responsibility of the Company'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 the Schedule I, Computation of Net Capital Pursuant to Rule 15c3-1 of the Securities and Exchange Commission, Schedule II, Computation for Determination of the Reserve Requirements Under Rule 15c3-3 of the Securities and Exchange Commission, and Schedule III, Information Relating to Possession or Control Under Rule 15c3-3 of the Securities and Exchange Commission are fairly stated, in all material respects, in relation to the financial statements as a whole.



We have served as the Company's auditor since 2012  
Abington, Pennsylvania  
February 25, 2022

**LoCorr Distributors, LLC**  
**Statement of Financial Condition**  
**December 31, 2021**

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**Assets**

Cash	\$	841,107
Accounts receivable		539,644
Receivable from related entity		392,022
Receivable from non-customer		270,277
Furniture and equipment - at cost \$264,895		
less accumulated depreciation of \$126,764		138,131
Software - at cost \$24,100		
less accumulated amortization of \$24,100		-
Prepaid expenses		<u>167,539</u>
Total assets	\$	<u><u>2,348,720</u></u>

**Liabilities and Member's Equity**

**Liabilities**

Commissions payable	\$	741,317
Accounts payable and accrued expenses		<u>137,571</u>
Total liabilities		<u>878,888</u>
Member's equity		<u>1,469,832</u>
Total liabilities and member's equity	\$	<u><u>2,348,720</u></u>

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

**LoCorr Distributors, LLC**  
**Statement of Operations**  
**For the Year Ended December 31, 2021**

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**Revenue**

Fees from sale of Investment Company Shares	\$ 5,363,521
Other Fees	<u>1,305,062</u>
Total revenue	<u>6,668,583</u>

**Expenses**

Salaries, commissions and benefits	5,619,133
Marketing and promotional expenses	130,821
Rent and occupancy costs	120,000
Regulatory costs	60,170
Technology and communications expenses	256,712
Travel expenses	530,445
Other expenses	<u>342,511</u>
Total expenses	<u>7,059,792</u>
Net loss	\$ <u><u>(391,209)</u></u>

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

**LoCorr Distributors, LLC**  
**Statement of Changes in Member's Equity**  
**For the Year Ended December 31, 2021**

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<b>Balance at January 1, 2021</b>	\$ 1,861,041
Net loss	(391,209)
Distribution to parent	<u>-</u>
<b>Balance at December 31, 2021</b>	<u><u>\$ 1,469,832</u></u>

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

**LoCorr Distributors, LLC**  
**Statement of Changes in Liabilities Subordinated to Claims of General Creditors**  
**For the Year Ended December 31, 2021**

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<b>Subordinated borrowings at January 1, 2021</b>	\$	-
Increases:		-
Decreases:		-
<b>Subordinated borrowings at December 31, 2021</b>	\$	<u>-</u>

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

**LoCorr Distributors, LLC**  
**Statement of Cash Flows**  
**For the Year Ended December 31, 2021**

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Cash flows provided by operating activities:	
Net income	\$ (391,209)
Adjustments to reconcile net income to net cash flows provided by operating activities:	
Depreciation & amortization	49,161
Changes in assets and liabilities:	
(Increase) decrease in assets:	
Accounts receivable	(137,508)
Due from related entity	(5,218)
Prepaid expenses	183,846
Increase (decrease) in liabilities:	
Commissions payable	416,067
Accounts payable and accrued expenses	<u>65,679</u>
Net cash flows provided by operating activities	<u>180,818</u>
Net increase in cash	<u>180,818</u>
Cash at beginning of year	<u>660,289</u>
Cash at end of year	<u>\$ 841,107</u>
Supplemental disclosures of cash flow information	
Cash paid during the year for:	
Interest	\$ -
Income taxes	\$ -

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

**LoCorr Distributors, LLC**  
**Notes to Financial Statements**  
**December 31, 2021**

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**1. Organization**

LoCorr Distributors, LLC ("the Company") is a registered broker dealer with the Securities and Exchange Commission ("SEC") and is a member of the Financial Industry Regulatory Authority ("FINRA") and the National Futures Association (NFA). The Company is incorporated under the laws of the state of Minnesota and is a wholly-owned subsidiary of Octavus Group, LLC (Parent) and acts as a wholesaler of alternative investments. The Company, like other broker dealers, is directly affected by general economic and market conditions, including fluctuations in volume and price level of securities, changes in interest rates and securities brokerage services, all of which have an impact on the Company's liquidity.

**2. Summary of Significant Accounting Policies**

*The following are the significant accounting policies followed by the Company:*

The Company considers all highly liquid debt instruments having original maturities of three months or less at the date of purchase to be cash equivalents.

*Cash and Cash Equivalents* – The Company includes as cash and cash equivalents amounts invested in money market funds.

At times during the year, the Company's cash accounts exceeded the related amount of federal depository insurance. The Company has not experienced any loss in such accounts and believes it is not exposed to any significant credit risk.

*Revenue* – The Company enters into arrangements with managed accounts or other pooled investment vehicles (funds) to market shares to financial institutions and their clients. The Company may receive fees paid by the fund manager up front or over time, or a combination thereof. The Company believes that its performance obligation is fulfilled upon the trade date of the securities sole by unaffiliated financial institutions to their clients. Any fixed amounts are recognized on the trade date and variable amounts are recognized to the extent it is probable that a significant revenue reversal will not occur once the uncertainty is resolved. For variable amounts, as the uncertainty is dependent on the value of the shares at future points in time as well as the length of time the investor remains invested in a fund, both of which are highly susceptible to factors outside the Company's influence, the Company does not believe that it can overcome this constraint until the market value of a fund and the investor activities are known.

*Income taxes* – No provision for income taxes is presented in these financial statements as income or loss from operations is includable in the member's income tax return.

The Company recognizes and discloses uncertain tax positions in accordance with accounting principles generally accepted in the United States of America (GAAP). GAAP requires management of the Company to analyze all open tax years, fiscal years 2018-2021, as defined by IRS statute of limitations for all major industries, including federal tax authorities and certain state tax authorities. As of and during the period ended December 31, 2021, the Company did not have a liability for any unrecognized tax benefits. The Company has no examinations in progress and is not aware of any tax positions for which it is reasonably possible that the total tax amounts of unrecognized tax benefits will significantly change in the next twelve months.

*Property and Equipment* – Property and equipment consists of office furniture and equipment and is recorded at cost and reduced by accumulated depreciation. Depreciation is calculated using the straight-line method over the estimated useful life of the assets. Depreciation expense for the year ended December 31, 2021 was \$45,000.

*Software* – Software consists of program customization and implementation costs and is recorded at cost and reduced by accumulated amortization. Amortization is calculated using the straight-line method over three years, the estimated useful life of the assets. Amortization expense for the year ended December 31, 2021 was \$0.

**LoCorr Distributors, LLC**  
**Notes to Financial Statements**  
**December 31, 2021**

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*Goodwill* – Assignment of certain placement agent agreements and is recorded at cost and reduced by accumulated amortization. Amortization is calculated using the straight-line method over fifteen years, the estimated useful life of the asset. Amortization expense for the year ended December 31, 2021 was \$4,161.

**2. Summary of Significant Accounting Policies (Continued)**

*Off balance sheet loss and credit risk* – The Company had no transactions involving derivatives and other off balance sheet financial instruments such as futures, exchange trades, over the counter options or mortgage backed securities and no off-balance sheet credit risk at December 31, 2021.

*Accounts Receivables and Credit Policies* – The receivable balance represents amounts due for monthly fees from clients. Accounts receivable are stated at the amount billed. Management individually reviews all receivable balances and estimates an allowance if necessary. In the opinion of management at December 31, 2021, all receivables were considered collectible and no allowance was necessary.

*Use of estimates* – The preparation of financial statements in conformity with generally accepted accounting principles 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 may differ from those estimates and assumptions.

*Subsequent events* - Management has evaluated the impact of all subsequent events, through February 25, 2022, the date at which the financial statements were available to be issued and has determined that there were no subsequent events requiring disclosure in these financial statements.

**3. Computation for Determination of Reserve Requirements**

The Company will operate in accordance with the exemptive provisions of section (k)(1) of SEC Rule 15c3-3.

**4. Net Capital Requirements**

Pursuant to the net capital provisions of the SEC and NFA, the Company is required to maintain net capital as defined under such provisions. Net capital and the related net capital ratio may fluctuate on a daily basis. At December 31, 2021 the Company had net capital and capital of \$232,496 which was \$173,903 in excess of its required net capital of \$58,593. The Company's net capital ratio was 3.78 to 1.

**5. Related Party Transactions**

The Company's Parent entity, through its wholly-owned subsidiary LoCorr Fund Management, LLC ("LFM"), a registered investment advisor, provides advisory services to LoCorr Investment Trust. LFM also has a minority investment in LoCorr Investment Trust for the year ended December 31, 2021. The Company shares services with a related party and invoices the related party for the shared cost. For the year ended December 31, 2021, shared services invoices totaled \$5,494,884.16. The Company believes that the shared services receivable of \$392,021.59 at December 31, 2021 is fully collectible. The Company also receives commissions based on a percentage of assets under management by LFM each period. For the year ended December 31, 2021, commissions totaled \$5,363,521. The Company believes that the commissions receivable of \$270,276.86 at December 31, 2021 is fully collectible.

**LoCorr Distributors, LLC**  
**Notes to Financial Statements (Continued)**  
**December 31, 2021**

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**6. Concentrations**

The Company earned approximately 80% of its commission income and had 87% of its accounts receivables from LoCorr Investment Trust and LoCorr Fund Management for the year ended and as of December 31, 2021. The Company also earned 20% of its commission income and had 13% of its accounts receivables from another client for the year ended and as of December 31, 2021.

**LoCorr Distributors, LLC**  
**Computation of Net Capital Under Rule 15c3-1**  
**of the Securities and Exchange Commission**  
**December 31, 2021**

**Schedule I**

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COMPUTATION OF NET CAPITAL

Total member's equity	\$ 1,469,832
Deduct member's equity not allowable for Net Capital:	<u>-</u>
Total member's equity qualified for Net Capital	<u>1,469,832</u>

Deductions and/or charges:

Non-allowable assets:

Accounts receivable	539,644
Receivable from related entity	392,022
Furniture and equipment, net	138,131
Software, net	-
Prepaid expenses	<u>167,539</u>
Total non-allowable assets	<u>1,237,336</u>

Net Capital	<u>\$ 232,496</u>
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COMPUTATION OF AGGREGATE INDEBTEDNESS

Total aggregate indebtedness liabilities from Statement of Financial Condition

Commissions payable	\$ 741,317
Accounts payable and accrued expenses	<u>137,571</u>

Total aggregate indebtedness	<u>\$ 878,888</u>
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Percentage of aggregate indebtedness to Net Capital	378%
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Percentage of debt to debt-equity total computed in accordance with Rule 15c3-1(d)	-
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**LoCorr Distributors, LLC**  
**Computation of Net Capital Under Rule 15c3-1**  
**of the Securities and Exchange Commission**  
**December 31, 2021**

**Schedule I (continued)**

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COMPUTATION OF BASIC NET CAPITAL REQUIREMENT

Minimum Net Capital (6 2/3% of \$878,888)	\$	58,593
Minimum dollar Net Capital requirement of reporting broker or dealer and minimum Net Capital requirement	\$	45,000
Net Capital requirement	\$	58,593
Excess Net Capital	\$	173,903
Net Capital less greater of 10% of aggregate indebtedness or 120% of minimum net capital	\$	144,607

RECONCILIATION BETWEEN COMPUTATION OF ANNUAL AUDIT REPORT  
AND COMPUTATION IN COMPANY'S UNAUDITED FOCUS REPORT

Computation of Net Capital Under Rule 15c3-1

No material difference exists between the broker's most recent, unaudited,  
Part IIA filing and the Annual Audit Report.

**LoCorr Distributors, LLC**  
**Computation for Determination of Reserve Requirements**  
**Under Rule 15c3-3 of the Securities and Exchange Commission**  
**December 31, 2021**

**Schedule II**

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The Company is exempt from the provisions of Rule 15c3-3 in accordance with Section (k)(1).

**RECONCILIATION BETWEEN COMPUTATION OF ANNUAL AUDIT REPORT  
AND COMPUTATION IN COMPANY'S UNAUDITED FOCUS REPORT**

**Computation for Determination of Reserve Requirement Under  
Exhibit A of Rule 15c3-3**

No material difference exists between the broker's most recent, unaudited, Part IIA filing and the Annual Audit Report.

**LoCorr Distributors, LLC**  
**Information Relating to the Possession or Control Requirements**  
**Under Rule 15c3-3 of the Securities and Exchange Commission**  
**December 31, 2021**

**Schedule III**

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The Company is exempt from the provisions of Rule 15c3-3 in accordance with Section (k)(1).

# Sanville & Company

CERTIFIED PUBLIC ACCOUNTANTS

1514 OLD YORK ROAD ABINGTON, PA 19001  
(215) 884-8460 • (215) 884-8686 FAX

MEMBERS OF  
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NEW YORK, NY 10005  
(212) 709-9512

## REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Member of  
LoCorr Distributors, LLC

We have reviewed management's statements, included in the accompanying Exemption Report in which (1) LoCorr Distributors, LLC (the "Company") stated that:

1. The Company claimed exemptions from 17 C.F.R. § 240.15c3-3 under the following provisions of 17 C.F.R. § 240.15c3-3 (k)(1).
2. The Company met the identified exemption provisions in 17 C.F.R. § 240.15c3-3 (k) throughout the most recent year ended December 31, 2021 without exception.

The Company'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 the Company'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

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)(1) of Rule 15c3-3 under the Securities Exchange Act of 1934.



Abington, Pennsylvania  
February 25, 2022



### **LoCorr Distributors, LLC's Exemption Report**

LoCorr Distributors, LLC (the "Company") is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. § 240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

- (1) The Company claimed an exemption from 17 C.F.R. § 240.15c3-3 under the following provisions of 17 C.F.R. § 240.15c3-3 (k)(1).
- (2) The Company met the identified exemption provisions in 17 C.F.R. § 240.15c3-3(k) throughout the most recent fiscal year without exception.

I, Jon C. Essen, affirm that, to my best knowledge and belief, this Exemption Report is true and correct.

A handwritten signature in black ink, appearing to read "Jon C. Essen", is written over a horizontal line.

Chief Financial Officer  
February 25, 2022