

# **Straits Financial LLC**

Financial Report  
December 31, 2023

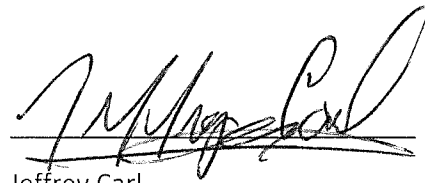
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This report is deemed PUBLIC in accordance with Regulation  
1.10(g) under the Commodity Exchange Act.

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February 23, 2024

Straits Financial LLC, a registered futures commission merchant, is submitting this audited annual report and its attachments as of and for the year ended December 31, 2023. The person whose signature appears below represents that, to the best of their knowledge, all information contained therein is true, correct and complete.

A handwritten signature in black ink, appearing to read 'Jeffrey Carl', written over a horizontal line.

Jeffrey Carl

Chief Financial Officer

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## **Independent Auditor's Report**



**RYAN & JURASKA LLP**  
Certified Public Accountants  
141 West Jackson Boulevard  
Chicago, Illinois 60604  
Tel: 312.922.0062  
Fax: 312.922.0672

## **REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM**

To the Members of  
Straits Financial LLC

### **Opinion on the Financial Statement**

We have audited the accompanying statement of financial condition of Straits Financial LLC (the "Company") as of December 31, 2023 that you are filing pursuant to Regulation 1.10 under the Commodity Exchange Act, and the related notes (collectively referred to as the financial statement). In our opinion, the statement of financial position presents fairly, in all material respects, the financial position of Straits Financial LLC as of December 31, 2023 in conformity with accounting principles generally accepted in the United States of America.

### **Basis for Opinion**

This financial statement is the responsibility of Straits Financial LLC's management. Our responsibility is to express an opinion on the Company's financial statement 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 Straits Financial LLC in accordance with U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission, the Commodity Futures Trading Commission ("CFTC"), and the PCAOB.

We conducted our audit in accordance with the standards of the PCAOB and the auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statement is free of material misstatement, whether due to error or fraud. Our audit included performing procedures to assess the risks of material misstatement of the financial statement, 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 statement. 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 statement. We believe that our audit provides a reasonable basis for our opinion.

### **Auditor's Report on Supplemental Information**

The information contained in Schedules I through VII ("the supplemental information") has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statement. The supplemental information is the responsibility of the Company's management. Our audit procedures included determining whether the supplemental information reconciles to the financial statement or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the supplementary schedules. In forming our opinion on the supplemental information, we evaluated whether the supplemental information, including its form and content, are presented in conformity with Regulation 1.10 of the Commodity Exchange Act. In our opinion, the supplemental information is fairly stated, in all material respects, in relation to the financial statement as a whole.

*Ryan & Juraska LLP*

We have served as Straits Financial LLC's auditor since 2018.

Chicago, Illinois  
February 23, 2024

## Straits Financial LLC

### Statement of Financial Condition

Year Ended December 31, 2023

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#### Assets

Cash and restricted cash	4,150,724
Cash segregated under federal and other regulations	25,115,471
Deposits with clearing organizations	343,053,485
Marketable securities, segregated	146,246,308
Receivables:	
Clearing brokers	18,681,544
Customers	140,915
Interest	1,378,423
Related parties	9,229,524
Brokers	70,251
Other	15,783
Exchange memberships, at cost (fair value \$1,788,500)	2,778,000
Lease Right-of-Use Asset	396,465
Furniture, equipment and software, at cost (net of accumulated depreciation and amortization of \$284,778)	59,887
Other assets	332,273

#### Total assets

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551,649,053

#### Liabilities and Members' Equity

##### Liabilities

##### Payables:

Customers	488,258,912
Noncustomers	5,603,478
Clearing organization	2,370,474
Related parties	2,589,083
Lease Liability	485,575
Commissions payable	2,531,532
Accounts payable, accrued expenses and other liabilities	1,387,578

#### Total liabilities

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503,226,632

#### Members' Equity

48,422,421

#### Total liabilities and members' equity

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551,649,053

See Notes to Financial Statement.

## **Note 1: Nature of Operations and Significant Accounting Policies**

**Nature of operations:** Straits Financial LLC (SFL or the Company), an Illinois limited liability company organized on October 13, 2010, is registered as a futures commission merchant with the Commodity Futures Trading Commission and is a member of the National Futures Association. SFL is a full clearing member of the Chicago Mercantile Exchange, Chicago Board of Trade, New York Mercantile Exchange, Commodity Exchange, CBOE Futures Exchange, Dubai Mercantile Exchange, and Clearport. SFL provides execution and clearing services for professional traders, institutional clients and individual investors. The majority owner of SFL is Straits (USA) Inc., an Illinois Corporation which is 100% owned by Straits Financial Group Pte, Ltd (SFG), a Singapore Corporation. SFG is primarily owned by CWT Limited (CWT), also a Singapore Corporation. CWT is a wholly-owned subsidiary of HNA Belt and Road Investments (Singapore) Pte. Ltd. (HNA), a Singapore Corporation that is wholly-owned by HNA Holding Group Co. Limited, a Hong Kong Corporation.

**Accounting policies:** The Company follows accounting principles generally accepted in the United States of America (GAAP), as established by the Financial Accounting Standards Boards (the FASB), to ensure consistent reporting of financial condition, results of operations and cash flows.

**Use of estimates:** The preparation of financial statements in conformity with 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 revenue and expenses during the reporting period. Actual results could differ from those estimates.

**Financial instruments:** Substantially all the Company's assets and liabilities are considered financial instruments and, except for exchange memberships, are either already reflected at fair value, or at carrying amounts that approximate fair value because of the short maturity of the instruments.

**Exchange memberships:** Exchange memberships, which represent ownership in the exchanges and provide the Company with the right to conduct business on the exchanges, are reflected in the statement of financial condition at cost, net of impairment. GAAP requires that such memberships be recorded at cost or, if an other-than-temporary impairment in value has occurred, at a value that reflects management's estimate of fair value. In the opinion of management, no other-than-temporary impairment has occurred.

**Revenue recognition:** The Company recognizes revenue in accordance with ASC Topic 606 *Revenue from Contracts with Customers* effective in 2018. The recognition and measurement of revenue is based on the assessment of individual contract terms. Significant judgement is required to determine whether performance obligations are satisfied at a point in time or over time.

The Company buys and sells futures and options on behalf of customers. Each time a customer enters into a buy or sell transaction, the Company charges a commission. Commissions and Fees revenue and related clearing expenses are recorded on the trade date. Interest income is earned on the accrual basis. Management fee income is from management and operational services provided to an affiliate through common ownership as defined in footnote 6.

The Company believes that the performance obligation is satisfied on the trade date because that is when the underlying financial instrument or purchaser is identified, the pricing is agreed upon and the risks and rewards of ownership have been transferred to/from the customer.

## **Note 1: Nature of Operations and Significant Accounting Policies (Continued)**

**Depreciation and amortization:** Depreciation of furniture and equipment and amortization of software is computed using the straight-line method over the estimated useful lives of the assets.

**Income taxes:** The Company is taxed as a partnership under the provisions of the Internal Revenue Code and, accordingly, is not subject to federal income taxes. Instead, the members are liable for the federal income taxes on their respective shares of taxable income or loss. FASB provides guidance for how uncertain tax positions should be recognized, measured, disclosed and presented in the financial statement.

The guidance requires the evaluation of tax positions taken or expected to be taken in the course of preparing the Company's tax returns to determine whether the tax positions are "more-likely-than-not" of being sustained "when challenged" or "when examined" by the applicable tax authority. Tax positions not deemed to meet the more-likely-than-not threshold would be recorded as a tax benefit or expense and liability in the current year. Management has determined that there are no material uncertain income tax positions through December 31, 2023. The Company is not subject to examination by U.S. federal, state, and foreign tax authorities for tax years before 2020.

**Translation of foreign currencies:** Assets and liabilities denominated in foreign currencies are translated at year-end exchange rates.

**Restricted cash:** Restricted cash of \$62,975 is included in cash on the statement of financial condition. The restricted cash is held in the form of a certificate of deposit and represents funds set aside in accordance with the Company's irrevocable standby letter of credit pursuant to the terms of the Company's operating lease dated November 30, 2010, and amended on both July 29, 2015, and August 5, 2020. The restriction will lapse when the operating lease expires. The Company reports restricted cash in accordance with FASB Statement of Cash Flows ("ASC Topic 230").

**Financial Instruments:** In June 2016, the FASB issued ASU 2016-13. Financial Instruments – Credit Losses (Topic 326) ("ASU 2016-13"). This ASU amends several aspects of the measurement of credit losses on financial instruments, including replacing the existing incurred credit loss model and other models with the Current Expected Credit Losses model ("CECL"). Under CECL, the allowance for losses reflects management's estimate of credit losses over the remaining expected life of the financial assets and expected credit losses for newly recognized financial assets, as well as changes to expected credit losses during the period, would be recognized in earnings. Expected credit losses will be measured based on historical experience, current conditions, and forecasts that affect the collectability of the reported amount and will be generally recognized earlier than under current standards. The adoption of this standard on January 1, 2023, did not have a material impact on the company's financial statement.



**Note 2: Assets Segregated or Held in Separate Accounts Under Federal and Other Regulations**

At December 31, 2023, assets segregated or held in separate accounts under federal and other regulations included in the statement of financial condition are as follows:

Segregated for customers trading on U.S. futures exchanges:

Cash at bank	\$ 8,041,763
Marketable Securities	146,246,308
Deposits with clearing organizations	327,178,838
Receivable from clearing brokers	7,629,463
Payable to clearing organizations	(2,369,783)
	<u>\$ 486,726,589</u>

Held in separate accounts for foreign futures and options customers:

Cash at bank	\$ 17,073,708
Deposits with clearing organization	-
Receivable from clearing brokers	10,289,233
	<u>\$ 27,362,941</u>

**Note 3: Deposits with Clearing Organizations**

At December 31, 2023, deposits with clearing organizations consisted of the following:

Margin deposits	
Cash	\$ 310,755,491
U.S. government securities	24,895,019
Settlement due from clearing organizations	-
Guarantee deposits:	
Cash	7,402,975
U.S. government securities	-
	<u>\$ 343,053,485</u>

**Note 4: Receivable from and Payable to Customers**

Receivables from and payables to customers arise primarily from futures and options on futures transactions and include gains and losses on open trades. Securities owned by customers and held by the Company as collateral or as margin and the value of option positions owned by customers are not reflected in the statement of financial condition. The Company holds customers' securities in either CFTC regulated bank safekeeping accounts or as margin with exchange clearing organizations or clearing brokers. The Company held customer owned U.S. government securities of \$78,097,851, and customer owned spot commodities of \$207,840 at December 31, 2023. At December 31, 2023, the Company also held (\$36,930,697) of customer net short options on futures contracts, which are pledged at the exchange clearing organizations. The fair value of net customers' options positions totaled (\$426,811).

**Note 5: Furniture, Equipment and Software**

At December 31, 2023, furniture, equipment and software consisted of the following:

Computers, equipment, and software	\$	289,889
Furniture and fixtures		54,766
		<u>344,665</u>
Accumulated depreciation and amortization		(284,778)
	\$	<u><u>59,887</u></u>

**Note 6: Related-Party Transactions**

At and during the year ended December 31, 2023, the Company had the following related-party transactions:

Entity - Affiliated due to common ownership by CWT Limited	Amount	Receivable/ Payable	Nature of item
Straits (USA), Inc	\$ 7,638,085	Receivable	Reimbursement for operating expenses
Straits (USA), Inc	\$ 2,000,000	Payable	Loan payable owed to Straits (USA) Inc
Straits Financial Fund Management	\$ 599,477	Receivable	Reimbursement for start-up expenses
Straits Financial Structured Products	\$ 966,538	Receivable	Management Fee Income owed from SFSP
Straits Horizon PTE Ltd.	\$ 4,256	Receivable	CFD revenue (monthly expenses)
Straits Financial Services Pte Ltd (SFS)	\$ 584,004	Payable	Trade payable owed to SFS
Orient Cache Limited (OCL)	\$ 21,169	Receivable	December commissions owed from affiliate

An affiliate through common ownership with a member of management is an IB that generated commission revenue. At December 31, 2023, the company owed the IB \$5,079.

**Note 7: Leases**

The Company conducts its operations in leased office facilities, and annual rentals are charged to current operations. One such lease is subject to an escalation clause based on the operating expenses of the lessor.

At December 31, 2023, minimum annual rental commitments under leases which have an initial or remaining term of one year or more were as follows:

Year ending December 31:	Operating
2024	142,054
2025	145,606
2026	149,246
2027	76,488
<b>Balance, end of year</b>	<u>\$ 513,394</u>
less imputed interest	(27,819)
Lease liability	<u><u>\$ 485,575</u></u>

**Note 7: Leases (continued)**

The Company recognizes and measures its leases in accordance with FASB ASC 842, *Leases*. The Company is a lessee in multiple non-cancellable operating leases, for office space. The Company determines if an arrangement is a lease, or contains a lease, at inception of a contract and when the terms of an existing contract are changed. The Company recognizes a lease liability and a right of use (ROU) asset at the commencement date of the lease. The lease liability is initially and subsequently recognized based on the present value of its future lease payments. Variable payments are included in the future lease payments when those variable payments depend on an index or a rate. The discount rate is the implicit rate if it is readily determinable or otherwise the Company uses its incremental borrowing rate. The Company used an implicit rate of 3.25% at the commencement date of all leases. The Company's incremental borrowing rate for a lease is the rate of interest it would have to pay on a collateralized basis to borrow an amount equal to the lease payments under similar terms and in a similar economic environment. The ROU asset is subsequently measured throughout the lease term at the amount of the re-measured lease liability (i.e., present value of the remaining lease payments), plus unamortized initial direct costs, plus (minus) any prepaid (accrued) lease payments, less the unamortized balance of lease incentives received, and any impairment recognized. Lease cost for lease payments is recognized on a straight-line basis over the lease term. The amendment was effective for the nonpublic companies beginning after December 15, 2021, with early adoption being permitted. The Company elected early adoption in 2019. Management believes the impact of Topic 842 had no material impact on its financial statement.

The Company has elected, for all underlying classes of assets, to not recognize ROU assets and lease liabilities for short-term leases that have a lease term of 12 months or less at lease commencement, and do not include an option to purchase the underlying asset that the Company is reasonably certain to exercise. The Company recognizes lease costs associated with the Company's short-term leases on a straight-line basis over the lease term. The Company made an accounting policy election by class of underlying asset, for computers and other office equipment, to account for each separate lease component of a contract and its associated non-lease components (lessor-provided maintenance) as a single lease component.

**Note 8: Contingencies**

The Company is subject to litigation, regulatory, and arbitration matters in the normal course of business. The Company vigorously defends against these claims and, in the opinion of management, the resolution of these matters will not have a material effect on the financial position of the Company.

**Note 9: Fair Value Measurements and Disclosure**

FASB ASC 820 defines fair value, establishes a framework for measuring fair value, and establishes a hierarchy of fair value inputs. U.S. government securities, commodity futures and options are carried at fair value. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. A fair value measurement assumes that the transaction to sell the asset or transfer the liability occurs in the principal market for the asset or liability or, in the absence of a principal market, the most advantageous market. Valuation techniques that are consistent with the market, income or cost approach, as specified by FASB ASC 820, are used to measure fair value.

**Note 9: Fair Value Measurements and Disclosure (continued)**

The fair value hierarchy prioritizes the inputs to valuation techniques used to measure fair value into three broad levels:

- Level 1 Quoted prices (unadjusted) in active markets for identical assets or liabilities that the Company can access at the measurement date.
- Level 2 Inputs other than quoted process included within level 1 that are observable for the asset or liability either directly or indirectly.
- Level 3 Unobservable inputs for the asset or liability.

The availability of observable inputs can vary from investment to investment and is affected by a wide variety of factors, including the type of investment, the liquidity of the markets and other characteristics particular to the investment. To the extent that valuation is based on models or inputs that are less observable or unobservable in the market, the determination of fair value requires more judgment.

Accordingly, the degree of judgment exercised by the Company in determining fair value is greatest for investments categorized in level 3. The inputs used to measure fair value may fall into different levels of the fair value hierarchy. In such cases, for disclosure purposes, the level in the fair value hierarchy wherein the fair value measurement fails in its entirety is determined based on the lowest level input that is significant to the fair value measurement. U.S. government securities and other cash investments that trade in active markets and are valued using quoted market prices with reasonable levels of price transparency are classified within Level 1 of the fair value hierarchy. Instruments that are not actively traded and are valued based on quoted prices in markets or by reference to Company or dealer quotations are generally classified within Level 2 of the fair value hierarchy. Exchange traded futures and options contracts are valued based on exchange settlement prices and are typically categorized within Level 1 or Level 2 of the fair value hierarchy, depending on whether or not they are deemed to be actively traded.

Derivatives held for trading purposes include both OTC and exchange-traded derivatives. The fair values of exchange-traded derivatives measured using observable exchange prices are included in level 1 of the fair value hierarchy. For exchange-traded derivatives where the volume of trading is low, the observable exchange prices may not be considered executable at the reporting date. These derivatives are valued in the same manner as similar observable OTC derivatives and are included in level 2 of the fair value hierarchy. If the similar OTC derivative used for valuing the exchange-traded derivative is not observable, the exchange-traded derivative is included in level 3 of the fair value hierarchy.

**Note 9: Fair Value Measurements and Disclosure (Continued)**

The fair values of OTC derivative are determined on the basis of industry standard models. The model uses various observable and unobservable inputs in order to determine fair value. The inputs include those characteristics of the derivative that have a bearing on the economics of the instrument. Where observable inputs (prices from exchanges, dealers, brokers or market consensus data providers) are not available, attempts are made to infer values from observable prices through model calibration (spot and forward rates, mean reversion, benchmark interest rate curves and volatility inputs for commonly traded option products).

For inputs that cannot be derived from other sources, estimates from historical data may be categorized as level 2 instruments, while those where the majority of the value is derived from unobservable inputs are categorized as level 3 of the fair value hierarchy.

At December 31, 2023, the Company's Level 1 investments consisted of U.S. government securities with a fair value of \$171,141,327. Additionally, the Company had open futures contracts totaling \$(225,075) which are Level 1 investments. The Company held no Level 2 or Level 3 investments at December 31, 2023.

**Note 10: Indemnifications and Guarantees**

In the normal course of business, the Company enters into contracts that contain a variety of representations and warranties that provide indemnifications under certain circumstances. The Company's maximum exposure under these arrangements is unknown, as this would involve future claims that may be made against the Company that have not yet occurred. The Company expects the risk of future obligation under these indemnifications to be remote.

The Company is a member of a clearing house and various exchanges. Associated with these memberships, the Company may be required to pay a proportionate share of the financial obligations of another member who may default on its obligations to these exchanges. While the rules governing different exchange memberships may vary, in general, the Company's guarantee obligations would arise only if the exchange had previously exhausted its resources. In addition, any such guarantee obligation would be apportioned among the other non-defaulting members of the exchange. The Company has not recorded any contingent liability in the financial statements for these guarantees, and management believes that any potential requirement to make payments under these guarantees is remote.

**Note 11: Off-Balance Sheet Risk and Concentration of Credit Risk**

The Company executes customer transactions in the purchase and sale of commodity futures contracts (including options on futures contracts), substantially all of which are transacted on a margin basis subject to individual exchange regulations. Such transactions may expose the Company to significant off-balance-sheet risk in the event margin requirements are not sufficient to fully cover losses that customers may incur. In the event the customer fails to satisfy its obligations, the Company may be required to purchase or sell futures contracts at prevailing market prices in order to fulfill the customer's obligations.

The Company controls this risk by monitoring margin collateral levels on a daily basis for compliance with regulatory and internal guidelines and requires additional collateral when necessary. The Company requires a customer to deposit additional margin collateral, or reduce positions, if it is determined that the customer's activities may be subject to above normal market risks. The Company believes that the deposits and collateral held at December 31, 2023, were adequate to minimize the risk of material loss that would be created by positions held at that time.

**Note 11: Off-Balance Sheet Risk and Concentration of Credit Risk (continued)**

The Company also enters into various transactions with futures commission merchants and other financial institutions. Cash and derivative financial instruments on deposit with futures commission merchants collateralize amounts due to these futures commission merchants and serve to satisfy margin requirements. In the event these counterparties do not fulfill their obligations, the Company may be exposed to risk. This risk of default depends on the creditworthiness of the counterparties to these transactions. It is the Company's policy to monitor the creditworthiness of each party with which it conducts business.

At December 31, 2023, the Company has a significant credit concentration of a \$28.3 million cash balance in BMO Bank. Additionally, the Company has cash deposits with the CME Group, Inc. of approximately \$311 million. Management believes the Company does not have significant exposure to any credit risk on cash.

**Note 12: Net Capital Requirements**

SFL is subject to net capital requirements pursuant to Regulation 1.17 under the Commodity Exchange Act, as amended. Under Regulation 1.17, SFL is required to maintain "adjusted net capital" equivalent to the greater of \$1,000,000 or the sum of 8 percent of customer and non-customer risk maintenance margin requirements. At December 31, 2023, under Regulation 1.17, SFL's net capital requirement and adjusted net capital were \$11,797,054 and \$34,632,442 respectively. The net capital requirements may effectively restrict member withdrawals. In addition, SFL is subject to CME Group, Inc. net capital requirements of \$5,000,000.

**Note 13: Subsequent Events**

The Company's management has evaluated events and transactions through February 23, 2024, the date the financial statement was available to be issued and noted none.

## Supplementary Schedules

**Straits Financial LLC**

**Statement of the Computation of the Minimum Capital Requirements  
December 31, 2023**

**Schedule I**

Total current assets, as defined		\$ 617,355,898
Adjusted total liabilities, as defined		<u>581,546,067</u>
<b>Net capital</b>		35,809,831
Charges against net capital:		
US government obligations	\$ 871,911	
Uncovered inventory	26,124	
Foreign broker charge	2,876	
Undermargined customer accounts	<u>276,478</u>	<u>1,177,389</u>
<b>Adjusted net capital</b>		\$ 34,632,442
Net capital required using risk-based requirement:		
Amount of customer and non-customer risk maintenance margin	<u>147,099,076</u>	
8 percent of customer and non-customer risk-based requirement		<u>11,767,926</u>
Amount of noncustomer risk maintenance margin	<u>364,102</u>	
8 percent of customer risk-based requirement		<u>29,128</u>
Minimum dollar amount requirement		5,000,000
Minimum requirement		<u>11,797,054</u>
<b>Excess net capital</b>		<u>22,835,388</u>
Computation of Early Warning -110% of risk-based minimum capital requirement		<u>\$ 12,976,759</u>

There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing.



**Straits Financial LLC**

**Reconciliation of the Statement of Financial Condition to the  
Statement of the Computation of the Minimum Net Capital Requirements  
December 31, 2023**

**Schedule II**

**Assets**

Total assets reflected in the statement of financial condition		\$ 551,649,053
Market value of options owned by customers		426,811
Market value of options owned by non-customers		(481,431)
Customer owned securities		78,097,851
Customer owned spot commodities		207,840
Non-customer owned spot commodities		68,364
Other adjustment of government securities		-
		<u>629,968,488</u>
Less noncurrent assets included in total assets:		
Restricted cash	\$ 62,975	
Other assets	332,273	
Receivables from customers	98,251	
Receivables from related parties	9,208,356	
Receivables from brokers	57,065	
Other receivables	15,783	
Exchange memberships	2,778,000	
Furniture, equipment and software, net	59,887	(12,612,590)
		<u>\$ 617,355,898</u>

**Total current assets, as defined**

**Liabilities**

Total liabilities reflected in the statement of financial condition		\$ 503,226,632
Market value of options owned by customers	426,811	
Market value of options owned by non-customers	(481,431)	
Customer owned securities	78,097,851	
Customer owned spot commodities	207,840	
Non-customer owned spot commodities	68,364	78,319,435
		<u>\$ 581,546,067</u>

**Adjusted total liabilities, as defined**

There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing.

**Straits Financial LLC**

**Statement of Segregation Requirements and Funds in Segregation for Customers  
Trading on U.S. Commodity Exchanges  
December 31, 2023**

**Schedule III**

<u>Segregation Requirements (Section 4d(2) of the CEAct)</u>	
Net ledger balance:	
Cash	\$ 390,489,901
Securities at market	78,305,691
Net unrealized profit in open futures contracts traded on a contract market	81,307,570
Exchange traded options:	
Market value of open options contracts purchased on a contract market	36,934,639
Market value of open options (sold) on a contract market	<u>(36,507,828)</u>
Net equity	550,529,973
Accounts liquidating to a deficit and accounts with debit balances with no open trades	<u>140,915</u>
Amount required to be segregated	<u><u>\$ 550,670,888</u></u>
<u>Funds in Segregated Accounts</u>	
Deposited in segregated funds bank accounts:	
Cash	\$ 8,041,763
Securities representing investments of customer's funds (at market)	141,360,861
Securities held for particular customers or option customers in lieu of cash (at market)	78,097,851
Margins on deposit with clearing organizations of contract markets:	
Cash	302,283,818
Securities representing investments of customer's funds (at market)	24,895,019
Securities held for particular customers or option customers in lieu of cash (at market)	-
Net settlement due to clearing organizations of contract markets	(2,369,783)
Exchange traded options:	
Value of open long option contracts	37,357,508
Value of open short option contracts	(36,930,697)
Net equities with other futures commission merchants:	
Net liquidating equity	7,629,463
Securities representing investments of customer's funds (at market)	4,885,447
Segregated funds on hand (warehouse receipts)	207,840
Total amount in segregation	<u><u>\$ 565,459,091</u></u>
Excess funds in segregation	<u><u>\$ 14,788,203</u></u>
Management Target Amount Excess funds in segregation	<u><u>\$ 2,000,000</u></u>
Excess funds in segregation over Management Target Amount Excess	<u><u>\$ 12,788,203</u></u>

There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing.

**Straits Financial LLC**

**Reconciliation of the Statement of Financial Condition to the  
Segregation Statement (U.S. Exchanges)  
December 31, 2023**

**Schedule IV**

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<b>Customers' Segregated Funds per Statement of Financial Condition (Note 2)</b>	\$ 486,726,589
Add:	
Spot commodities owned by customers	207,840
Securities held for customers	78,097,851
Value of customers' open long futures options contracts	37,357,508
Deduct:	
Value of customers' open short futures options contracts	(36,930,697)
<b>Total Amount in Segregation</b>	<u><u>\$ 565,459,091</u></u>

**Segregation Requirement and Funds in Segregation - Customers' Dealer Options and Cleared Swaps Customer Accounts**

**December 31, 2023**

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The Company does not carry customers' dealer option accounts as defined by Commodity Exchange Act Regulation 32.6. Therefore, the Company is exempt from the provisions of Regulation 32.6.

The Company does not carry cleared swap customer accounts as defined by Commodity Exchange Act Regulation 4d(f). Therefore, the Company is exempt from the provisions of Regulation 4d(f).

**Straits Financial LLC**

**Statement of Secured Amounts and Funds Held in Separate  
Accounts for Foreign Futures and Foreign Options Customers  
Pursuant to Commission Regulation 30.7  
December 31, 2023**

**Schedule VI**

Foreign Futures and Foreign Options Secured Amounts

Net ledger balance - Foreign Futures and Foreign Option Trading - All Customers:		
Cash		\$ 17,349,010
Net unrealized gain in open futures contracts traded on a foreign board of trade		(1,028,484)
Exchange traded options:		
Market value of open options contracts purchased on a foreign board of trade		-
Market value of open options granted (sold) on a foreign board of trade		-
Net equity		<u>16,320,526</u>
Accounts liquidating to a deficit and accounts with debit balances with no open trades		<u>-</u>
Amount required to be set aside as the secured amount - Net Liquidating Equity Method		<u>\$ 16,320,526</u>

Funds deposited in separate Regulation 30.7 accounts:

Cash in banks located in the United States		\$ 17,073,708
Equities with registered futures commission merchants		
(StoneX Financial Inc, R.J. O'Brien)	\$ 5,402,079	
Unrealized gain (loss) on open futures contracts	1,993	
Value of long options contracts	-	
Value of short options contracts	-	5,404,072
Amounts held by clearing organizations of foreign boards of trade		
Cash	-	
Unrealized gain (loss) on open futures contracts	-	
Value of short options contracts	-	-
Amounts held by members of foreign boards of trade		
(CIMB, CGS-CIMB, Nissan, StoneX Financial LTD)	5,915,757	
Unrealized gain (loss) on open futures contracts	(1,030,596)	
Value of short options contracts	-	4,885,161
Total funds in separate Section 30.7 accounts		<u>\$ 27,362,941</u>
Excess funds in separate Section 30.7 accounts		<u>\$ 11,042,415</u>
Management Target Amount For Excess funds in separate 30.7 accounts		<u>\$ 300,000</u>
Excess funds in separate 30.7 accounts over Management Target Amount Excess		<u>\$ 10,742,415</u>

There are no material differences between the above computation and the Company's corresponding unaudited Form 1-FR-FCM filing.

**Straits Financial LLC**

**Reconciliation of the Statement of Financial Condition to the  
Secured Statement (Non-U.S. Exchanges)  
December 31, 2023**

**Schedule VII**

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<b>Customers' Secured 30.7 Funds per Statement of Financial Condition (Note 2)</b>	\$ 27,362,941
Add:	
Value of customers' open long futures options contracts	-
Deduct:	
Value of customers' open short futures options contracts	-
<b>Total Funds in Separate Section 30.7 Accounts</b>	<u><u>\$ 27,362,941</u></u>



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## **INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL**

To the Members of  
Straits Financial LLC

In planning and performing our audit of the financial statements of Straits Financial LLC (the "Company") as of and for the year ended December 31, 2023, in accordance with standards of the PCAOB and the auditing standards generally accepted in the United States of America, we considered the Company's internal control over financial reporting ("internal control") as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we do not express an opinion on the effectiveness of the Company's internal control.

Also, as required by Regulation 1.16 of the Commodity Futures Trading Commission (the "CFTC"), we have made a study of the practices and procedures followed by the Company, including consideration of control activities for safeguarding customer and firm assets. This study included tests of compliance with such practices and procedures that we considered relevant to the objectives stated in Regulation 1.16 in making the following:

The periodic computations of minimum financial requirements pursuant to Regulation 1.17.

The daily computations of the segregation requirements of section 4d(2) of the Commodity Exchange Act (the "CEAct") and the regulations thereunder, and the segregation of funds based on such computations.

The daily computations of the foreign futures and foreign options secured amount requirements pursuant to Regulation 30.7 under the CFTC.

The daily computations of cleared swaps segregation requirements and funds in cleared swaps customer accounts under 4D(F) of the CEAct.

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

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

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the Company's financial statements will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control was for the limited purpose described in the preceding paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. Given these limitations, during our audit, we did not identify any deficiencies in internal control and control activities for safeguarding securities and certain regulated commodity customer and firm assets that we consider to be material weaknesses.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the CFTC to be adequate for its purposes in accordance with the CEAct and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures, as described in the second paragraph of this report, were adequate at December 31, 2023 to meet the CFTC's objectives.

This communication is intended solely for the information and use of the management, the members, others within the Company, the CFTC, the National Futures Association, the CME Group Inc. and other regulatory agencies that rely on Regulation 1.16 of the CFTC in their regulation of registered futures commission merchants and is not intended to be, and should not be, used by anyone other than these specified parties.

*Ryan & Juraska LLP*

Chicago, Illinois  
February 23, 2024