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Information Required of Securities Exchan		ers Pursuant to Sec d Rule 17a-5 There		he
REPORT FOR THE PERIOD BEGINNING	01/01/2015	AND ENDING	12/31/2015	
	MM/DD/YY		MM/1	DD/YY
A. REG	ISTRANT IDENT	IFICATION		
NAME OF BROKER-DEALER: Rogan &	Associates, Inc.		OFFI	CIAL USE
ADDRESS OF PRINCIPAL PLACE OF BUSI	NESS: (Do not use P.	O. Box No.)	F	IRM I.D. N
200 Ninth Avenue North, Suite 150	·		L	
	(No. and Street)			
Safety Harbor	FL		34695	
(City)	(State)		(Zip Code)	
NAME AND TELEPHONE NUMBER OF PER Michael G. Rogan	RSON TO CONTACT	IN REGARD TO THIS	727-712	
В АССС	OUNTANT IDENT	THICATION	(Area Code	- Telephone
B. ACCC				
INDEPENDENT PUBLIC ACCOUNTANT where the second seco	nose opinion is contair	ned in this Report*		
Raulerson Castillo Westlake & Compan				
.) 1907 S. Alexander Street, Suite 2	Name – <i>if individual, state</i> Plant City	last, first, middle name) FL		33566
(Address)	(City)	(State	;)	(Zip Cod
CHECK ONE:				
Certified Public Accountant				
Public Accountant				
Accountant not resident in Unite	ed States or any of its p	possessions.		
	FOR OFFICIAL US	EONLY		

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

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## OATH OR AFFIRMATION

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, Michael Rogan	, swear (or affirm) that, to the best of
ny knowledge and belief the accompanying finar Rogan & Associates, Inc.	ncial statement and supporting schedules pertaining to the firm of , a
of December 31	, 20 <sup>15</sup> , are true and correct. I further swear (or affirm) that
heither 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 f	follows:
None	
	$\sim$
	Signature
	President
Na	Title
Therese L. Herguson	
Notary Public	en and a second and a second a
	THERESE L. FERGUSON
This report <b>**</b> contains (check all applicable box $\Box$ (c). Provide	es):
<ul> <li>(a) Facing Page.</li> <li>(b) Statement of Financial Condition.</li> </ul>	6000000000000
$\Box$ (c) Statement of Income (Loss).	
(d) Statement of Changes in Financial Cond	ition.
(e) Statement of Changes in Stockholders' E	
(f) Statement of Changes in Liabilities Subo	ordinated to Claims of Creditors.
<ul> <li>(g) Computation of Net Capital.</li> <li>(h) Computation for Determination of Reser</li> </ul>	ve Decuirements Dursuant to Dula 15c2 2
$\Box$ (i) Computation for Determination of Reser	
	explanation of the Computation of Net Capital Under Rule 15c3-1 and the
	eserve Requirements Under Exhibit A of Rule 15c3-3.
	d unaudited Statements of Financial Condition with respect to methods of
consolidation.	
$\Box (l) An Oath or Affirmation.$	
<ul> <li>(m) A copy of the SIPC Supplemental Report</li> <li>(n) A report describing any material inadequal</li> </ul>	t. Icies found to exist or found to have existed since the date of the previous at
material material material material material	
**For conditions of confidential treatment of cer	

ROGAN & ASSOCIATES, INC. AUDITED FINANCIAL STATEMENTS DECEMBER 31, 2015

### TABLE OF CONTENTS

Independent Public Accountants' Report

# Financial Statements:

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ר . ש Statements of Financial Condition

Statements of Operations

Statement of Cash Flows

Statement of Changes in Liabilities Subordinated to Claims and General Creditors

Notes to the Financial Statements

### Supplementary Schedules:

Schedules of Computation of Net Capital

Schedule of Computation of Reserve Requirements

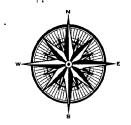
Information Relating to Possession or Control Requirements

#### **Required Reports:**

Independent Public Accountants' Review of the Exemption Report

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Independent Auditors' Report of SIPC Assessment



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# RAULERSON CASTILLO WESTLAKE & COMPANY

Certified Public Accountants and Consultants

**Business Navigation** 

1907 S. Alexander Street, Suite 2 Plant City, Florida 33566 P: (813) 752-6604 | F: (813) 752-8725

### INDEPENDENT PUBLIC ACCOUNTANTS' REPORT

To the Board of Directors and Stockholder of Rogan & Associates, Inc.

We have audited the accompanying statements of financial condition of Rogan & Associates, Inc. (a Florida corporation) as of December 31, 2015, and the related statements of operations, changes in stockholders' equity, and cash flows for the year then ended that you are filing pursuant to rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. The company is not required to have, nor were we engaged to perform, an audit of its internal control over financial reporting. Our audit included consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for expressing an opinion on the effectiveness of the company's internal control over financial reporting. Accordingly, we express no such opinion. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements and assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Rogan & Associates, Inc. as of December 31, 2015, 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.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in the supplementary schedules is presented for the purposes of additional analysis and is not a required part of the basic financial statements, but is supplementary information required by rule 17a-5 under the Securities Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly presented in all material respects in relation to the basic financial statements taken as a whole.

Kaulerson Castillo Westlake & Company, PA Raulerson Castillo Westlake & Company PA

Raulerson Castillo Westlake & Comp Plant City, Florida February 22, 2016

#### www.rcwcpas.com

Member: American Institute of Certified Public Accountants and Florida Institute of Certified Public Accountants

## FINANCIAL STATEMENTS

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New York Contractor

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## ROGAN & ASSOCIATES, INC. STATEMENT OF FINANCIAL CONDITION DECEMBER 31, 2015

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## ASSETS

| Cash and cash equivalents                                            | \$        | 132,084          |
|----------------------------------------------------------------------|-----------|------------------|
| Receivable from broker-dealers, mutual funds and insurance companies |           | 190,333          |
| Other receivables                                                    |           | 648,513          |
| Deposit with clearing broker                                         |           | 25,000           |
| Investments                                                          |           | 32,988           |
| Fixed assets (net of depreciation)                                   |           | 18,427           |
| Other assets                                                         |           | 9,963            |
| Total assets                                                         | \$        | <u>1,057,308</u> |
| LIABILITIES AND STOCKHOLDERS' EQUITY                                 |           |                  |
| LIABILITIES                                                          |           |                  |
| Accounts payable and accrued expenses                                | \$_       | 205,464          |
| Total liabilities                                                    |           | 205,464          |
| STOCKHOLDERS' EQUITY                                                 |           |                  |
| Common stock, \$1 par value                                          |           | 150              |
| Additional paid-in capital                                           |           | 30,985           |
| Retained earnings                                                    |           | 844,834          |
| Less Treasury Stock, at cost                                         |           | (24,125)         |
| Total stockholders' equity                                           |           | 851,844          |
| Total liabilities and stockholders' equity                           | <u>\$</u> | 1,057,308        |
|                                                                      |           |                  |

SEE ACCOMPANYING AUDITORS' REPORT AND NOTES TO THE FINANCIAL STATEMENTS.

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## STATEMENT OF OPERATIONS

## For The Year Ended December 31, 2015

#### REVENUE

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| Commissions and fees | \$ 3,236,514 |
|----------------------|--------------|
| Other revenue        | 23,535       |
| TOTAL REVENUE        | \$ 3,260,049 |

## GENERAL AND ADMINISTRATIVE EXPENSES

| Employee compensation and benefits | 2,736,319    |
|------------------------------------|--------------|
| Clearing costs                     | 18,834       |
| Occupancy                          | 257,433      |
| Other operating expenses           | 158,265      |
| Amortization                       | 315          |
| Depreciation                       | 1,172        |
| TOTAL EXPENSES                     | \$ 3,172,338 |

INCOME (LOSS) BEFORE INCOME TAXES

## <u>\$ 87,711</u>

**INCOME TAXES** 

NET INCOME (LOSS)

<u>\$ 87,711</u>

SEE ACCOMPANYING AUDITORS' REPORT AND NOTES TO THE FINANCIAL STATEMENTS.

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STATEMENT OF CASH FLOWS

## For The Year Ended December 31, 2015

| CASH FLOWS FROM OPERATING ACTIVITIES:                                     |           |          |
|---------------------------------------------------------------------------|-----------|----------|
| Net income                                                                | \$        | 87,711   |
| Noncash items included in net income                                      |           |          |
| Increase in due from broker-dealers, mutual funds and insurance companies |           | (28,994) |
| Increase in other receivables                                             |           | (959)    |
| Increase in prepaid assets                                                |           | (9,963)  |
| Increase in fixed assets                                                  |           | (14,542) |
| Increase in Accumulated Depreciation and Amortization                     |           | 1,487    |
| Decrease in investments                                                   |           | 1,277    |
| Increase in payables and accrued expenses                                 |           | 42,745   |
| NET CASH PROVIDED THROUGH OPERATING ACTIVITIES                            |           | 78,762   |
| NET INCREASE IN CASH AND CASH EQUIVALENTS                                 |           | 78,762   |
| CASH AND CASH EQUIVALENTS:<br>Beginning of year                           | \$        | 53,322   |
| End of year                                                               | <u>\$</u> | 132,084  |

SEE ACCOMPANYING AUDITORS' REPORT AND NOTES TO THE FINANCIAL STATEMENTS.

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| <b>7</b> 3 |                          |       |              |       |                     |                   |                 |            |
| La         |                          |       |              | POG   | 201 8 100           | OCIATES, INC.     |                 |            |
|            |                          | STAT  |              |       |                     | N STOCKHOLDI      |                 |            |
| L. J       |                          | JIAI  |              |       |                     | December 31, 2    |                 |            |
| <b>~</b> 1 |                          |       | TOP          | ine i |                     | December 31, 2    | 2013            |            |
| L,         |                          |       |              |       |                     |                   |                 |            |
| <b>~</b> 1 |                          |       |              |       |                     |                   |                 |            |
| L          |                          | Ca    | nital        | г     | <sup>2</sup> aid-in | Treasury          | Retained        | Total      |
| r 1        |                          | St    | pital<br>ock |       | Capital             | Treasury<br>Stock | Earnings        | TOLAI      |
| 4          |                          |       |              |       | - apres             |                   |                 |            |
| <b>5</b> 1 | Balance,                 | \$    | 150          | \$    | 30,985              | \$ (24,125)       | \$ 757,123      | \$ 764,133 |
| <b>L</b> J | December 31,<br>2014     |       |              |       |                     |                   |                 |            |
| <b>"</b> ] |                          |       |              |       |                     |                   |                 |            |
| a a        | Net income               |       |              |       |                     |                   | 87,711          | 87,711     |
| <b>F</b> 1 |                          |       |              |       |                     |                   |                 |            |
| هه         | Dalamaa                  | ¢     | 450          | ¢     | 20.005              | ¢ (04 405)        | ¢ 044 024       | ¢ 051 044  |
| <b>~</b> ] | Balance,<br>December 31, | \$    | 150          | \$    | 30,985              | \$ (24,125)       | \$ 844,834      | \$ 851,844 |
| i          | 2015                     |       |              |       |                     |                   |                 |            |
| " I        |                          |       |              |       |                     |                   |                 |            |
| ف          |                          |       |              |       |                     |                   |                 |            |
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| 4. J       |                          | Μρανι |              |       | S' REP∩RT ∆         | ND NOTES TO THE   | FINANCIAL STATE | MENTS.     |
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|                          | ROGAN & ASSOC         | IATES, INC.           |   |
|--------------------------|-----------------------|-----------------------|---|
| STATE                    | MENT OF CHANGES IN LI | ABILITIES SUBORDINATE | Đ |
|                          | TO CLAIMS AND GENE    | RAL CREDITORS         |   |
|                          | For The Year Ended De | ecember 31, 2015      |   |
|                          |                       |                       |   |
|                          |                       |                       |   |
| Balance, December 31, 20 | 014                   |                       |   |
| Increases                |                       |                       |   |
| Decreases                |                       |                       |   |
|                          |                       |                       |   |
| Balance, December 31, 20 | )15                   |                       |   |
|                          |                       |                       |   |
|                          |                       |                       |   |
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## ROGAN & ASSOCIATES, INC. NOTES TO FINANCIAL STATEMENTS December 31, 2015

#### NOTE A --- SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

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с П 1 1 - 1 <u>Organization and Description of Business:</u> The Company is a securities broker dealer organized under the laws of the state of Florida in January 1997. The Company's primary business is providing investment advice and brokerage of publicly traded securities and insurance products. The Company's customers are located throughout the United States, but primarily in Florida.

The Company is registered with the U.S. Securities and Exchange Commission as a broker dealer and an investment adviser. Much of the regulation of broker dealers has been delegated to selfregulatory organizations, which in the Company's case, includes the Financial Industry Regulatory Authority and the Municipal Securities Rulemaking Board, and the securities commissions of appropriate states.

<u>Basis of Presentation.</u> The accompanying statement of financial condition has been prepared in conformity with accounting principles generally accepted in the U.S., which require management to make certain estimates and assumptions that affect the reported amounts in the accompanying financial statement. Those estimates and assumptions affect the reported amounts of assets, liabilities, revenues and expenses. Actual results could vary from the estimates that were assumed in preparing the financial statement.

<u>Cash and Cash Equivalents:</u> The Company considers all cash and money market instruments with a maturity of ninety days or less to be cash and cash equivalents.

The Company maintains its demand deposits in a high credit quality financial institution. Balances at times may exceed federally insured limits.

<u>Securities Owned:</u> Securities owned are recorded at fair value based on quoted market prices or other observable market data. A summary of securities owned at December 31, 2015 is as follows: mutual funds \$32,988.

<u>Property and Equipment:</u> Property and equipment are recorded at cost. Depreciation and amortization is calculated on the straight-line method over the estimated useful lives of the assets (generally three, five or seven years).

<u>Income Taxes:</u> As of December 31, 2015, the financial statements reflected income taxes payable of \$0 and a deferred tax asset of \$0. The deferred tax asset represents the estimated future tax consequences resulting from the differences in book and tax depreciation methods, and the limitations of deductibility of the estimated legal and settlement costs accrued for financial reporting methods.

<u>Securities Transactions:</u> Customers' securities transactions are reported on a settlement date basis which does not differ significantly from trade date basis.

SEE INDEPENDENT AUDITORS' REPORT

#### NOTES TO FINANCIAL STATEMENTS

#### December 31, 2015

<u>Accounts Receivable</u>: The carrying amount of accounts receivable is reduced by a valuation allowance that reflects management's best estimate of the amounts that will not be collected. Management individually reviews all delinquent accounts receivable balances and based on an assessment of current creditworthiness, estimates the portion, if any, of the balance that will not be collected. Generally, receivables are believed to be fully collectible; accordingly, no allowance for doubtful accounts is reflected in the accompanying financial statements.

<u>Other Receivables:</u> The components of Other Receivables as of December 31, 2015 are as follows: Amounts due to/from Stockholder \$648,513.

<u>Date of Management's Review:</u> Subsequent events were evaluated through February 22, 2016, which is the date the financial statements were available to be issued.

#### NOTE B — LEASE COMMITMENTS

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The Company has entered into a lease for office space expiring in 2019. The Company also entered into a one-year lease for office space in another location. Office space for a third location is on a month-to-month basis. Total 2016 rent expense is estimated to be \$135,000.

#### NOTE C — NET CAPITAL AND CUSTOMER PROTECTION

The Company, as a registered broker dealer, is subject to the U.S. 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, 2015, the Company had net capital of \$105,319 which was \$91,621 in excess of its required net capital of \$13,698 and the ratio of aggregate indebtedness to net capital was 1.95 to 1.0.

The Company is also subject to the U.S. Securities and Exchange Commission Customer Protection Rule (Rule 15c3-3) and operates pursuant to the exemptive provisions of paragraph (k)(2)(ii) of the Rule.

#### NOTE D — INCOME TAXES

The provision for income taxes is summarized as follows:

| Current income tax expense   | \$ 43,0 | 003 |
|------------------------------|---------|-----|
| Deferred income tax benefit  | \$ 43,0 | 003 |
| Income tax expense (benefit) | \$      | 0   |

#### NOTE E - OFF BALANCE SHEET RISK

In the normal course of business, the Company effects securities transactions for the accounts of its customers. These activities may expose the Company to off balance sheet risk in the event the

#### SEE INDEPENDENT AUDITORS' REPORT

#### NOTES TO FINANCIAL STATEMENTS

#### December 31, 2015

customer or other broker is unable to fulfill its contracted obligations and the Company has to purchase or sell the financial instrument underlying the contract at a loss.

#### NOTE F — CONTINGENCIES

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ר־ \_\_ The Company is subject to litigation in the normal course of business. The Company has no litigation in progress at December 31, 2015.

#### NOTE G — RETIREMENT PLAN

The Company has a profit sharing plan with a 401(k) (salary reduction plan feature) covering substantially all full-time employees. Company contributions are discretionary. Employer contributions for 2015 were \$63,680.

NOTE H — CLEARING BROKER-DEALER

The Company clears all of its proprietary and customer transactions through another broker-dealer on a fully disclosed basis. The fully disclosed correspondent/clearing agreement requires a deposit with the clearing firm of \$25,000. Provided that the Company is not in default of its obligations or liabilities to the clearing firm, the clearing firm will return the security deposit following termination of the fully disclosed correspondent/clearing agreement.

## SUPPLEMENTAL INFORMATION

SEE INDEPENDENT AUDITORS' REPORT

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## ROGAN & ASSOCIATES, INC. COMPUTATION OF NET CAPITAL UNDER RULE 15c3-1 OF THE SECURITIES EXCHANGE ACT OF 1934 AS OF DECEMBER 31, 2015

### NET CAPITAL:

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| Total stockholders' equity                     | \$<br>851,844   |
|------------------------------------------------|-----------------|
| Less non-allowable assets:                     |                 |
| Accounts receivable — non-allowable            | <br>(737,827)   |
| Net capital before haircuts                    | 114,017         |
| Less haircuts                                  | <br>(8,698)     |
| Net capital                                    | 105,319         |
| Less required capital                          | <br>(13,698)    |
| Excess net capital                             | \$<br>91,621    |
| Aggregate indebtedness                         | \$<br>205,464   |
| Ratio of aggregate indebtedness to net capital | <br>1.95 to 1.0 |

RECONCILIATION WITH COMPANY'S COMPUTATION OF NET CAPITAL INCLUDED IN PART IIA OF FORM X-17A-5 AS OF DECEMBER 31, 2015.

There is no difference between net capital as reported above and net capital as reported in FOCUS Report.

SEE INDEPENDENT AUDITORS' REPORT

#### SCHEDULE II

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## COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS UNDER RULE 15c3-3 OF THE SECURITIES EXCHANGE ACT OF 1934 AS OF DECEMBER 31, 2015

The Company is exempt from the provisions of Rule 15c3-3 under the Securities Exchange Act of 1934, pursuant to paragraph (k)(2)(ii) of the Rule.

#### SCHEDULE III

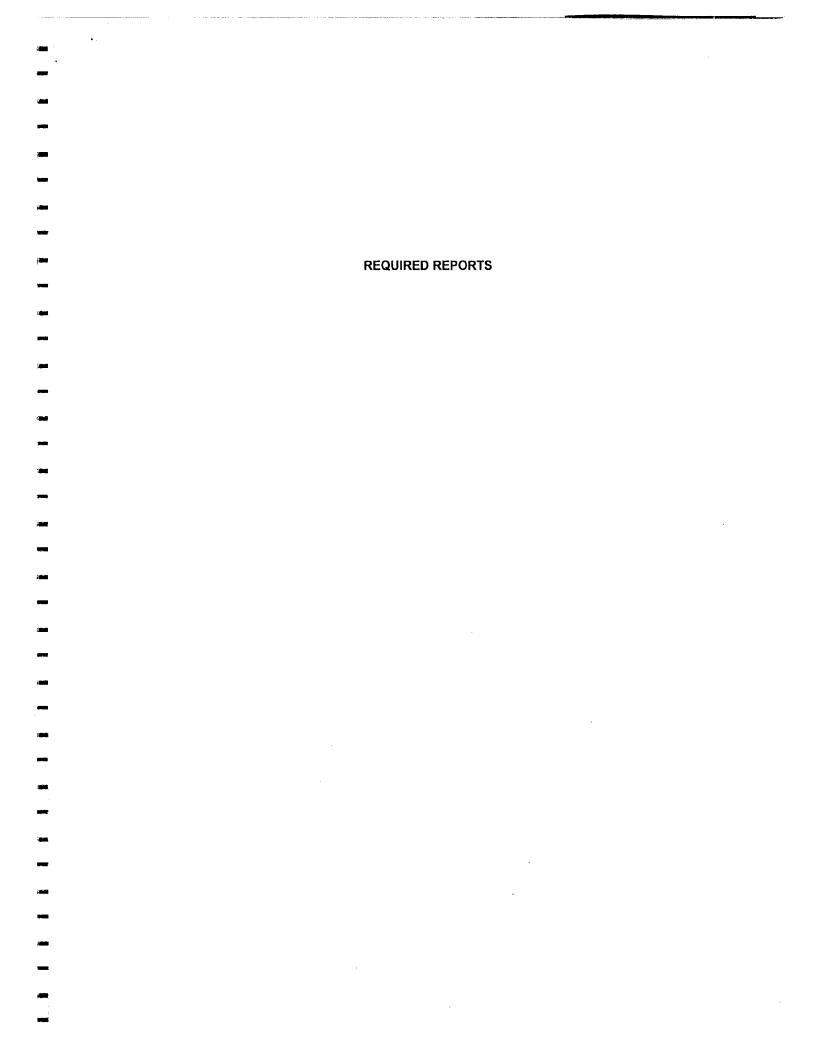
#### INFORMATION RELATING TO THE POSSESSION OR CONTROL

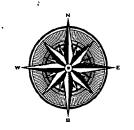
#### REQUIREMENTS

#### UNDER RULE 15c3-3 OF THE SECURITIES EXCHANGE ACT OF 1934

#### AS OF DECEMBER 31, 2015

The Company is exempt from the provisions of Rule 15c3-3 under the Securities Exchange Act of 1934, pursuant to paragraph (k)(2)(ii) of the Rule.





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# RAULERSON CASTILLO WESTLAKE & COMPANY

Certified Public Accountants and Consultants

**Business Navigation** 

1907 S. Alexander Street, Suite 2 Plant City, Florida 33566 P: (813) 752-6604 | F: (813) 752-8725

## INDEPENDENT PUBLIC ACCOUNTANTS' REVIEW OF THE EXEMPTION REPORT

To the Board of Directors of and Shareholders Rogan & Associates, Inc.

We have reviewed management's statements, included in the accompanying exemption report of Rogan & Associates, Inc., in which (1) Rogan & Associates, Inc. ("the Company") identified the following provisions of 17 C.F.R. Section 15c3-3(k) under which the Company claimed an exemption from 17 C.F.R. Section 240.15c3-3: (k)(2)(ii) (the "exempt provision") and (2) the Company stated that the Company met the identified exemption provision throughout the most recent fiscal year without exception.

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 provision. 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 Rule 15c3-3 under the Securities Exchange Act of 1934.

Raulerson Castillo Westlake & Company, PA

Raulerson Castillo Westlake & Company PA Plant City, Florida February 22, 2016

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## Rogan & Associates, Inc.

#### **Exemption Report**

Rogan & Associates, Inc. (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:

The Company claimed an exemption from 17 C.F.R. § 240.15c3-3 under the following provisions of 17 CFR §240.15c3-3 pursuant to paragraph (k)(2)(ii).

The Company met the exemption provisions of §240.15c3-3(k)(2)(ii) throughout the most recent fiscal year without exception.

I, Michael Rogan, swear (or affirm) that, to my best knowledge and belief, this Exemption Report is true and correct.

By:

ROGAN

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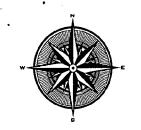
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Michael Rogan, President

ASSOCIATES

Date: January 28, 2016

t: 727.712.3400 tf:1.866.779.3258 Member: SIPC



# RAULERSON CASTILLO WESTLAKE & COMPANY

Certified Public Accountants and Consultants

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

To the Board of Directors of and Shareholder of Rogan & Associates, Inc.

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments to the Securities Investor Protection Corporation (SIPC) for the Year Ended December 31, 2015, which were agreed to by Rogan & Associates, Inc. and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc., and SIPC, solely to assist you and the other specified parties in evaluating Rogan & Associates, Inc.'s compliance with the applicable instructions of the Transitional Assessment Reconciliation (Form SIPC-7). Rogan & Associates Inc.'s management is responsible for the Rogan & Associates Inc.'s compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose. The procedures we performed and our findings are as follows:

1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement records entries in the check register noting no differences;

2. Compared the amounts reported on the audited Form X-17A-5 for the year ended December 31, 2015, as applicable, with the amounts reported in Form SIPC-7 for the year ended December 31, 2015 noting no differences;

3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers of Focus reports noting no differences; and

4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers of Focus reports supporting the adjustments noting no differences.

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We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

Kaulerson Castillo Westlake & Company, P.A.

Raulerson Castillo Westlake & Company PA Plant City, Florida February 22, 2016

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