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## ANNUALSAUDITED REPORT SOCFORM X-17A-5 FEB 2 4 2 LPART III



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# Washingtofa@ing PAGE Information Required of Biokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING	G 01/01/2016 MM/DD/YY	AND ENDING	12/31/2016 MM/DD/YY
A. RI	EGISTRANT IDENTIFI	CATION	. 1
NAME OF BROKER-DEALER: All	1 : Company of	Flaida INC	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE OF BU			FIRM I.D. NO.
	1401 S. Florida Aven (No. and Street)	ue	
Lakeland	FL	33	3803
(City)	(State)	(Zi	p Code)
NAME AND TELEPHONE NUMBER OF Kristen Benton	PERSON TO CONTACT IN	REGARD TO THIS REPO (863) 616-6	
		(1	Area Code - Telephone Number)
B. AC	COUNTANT IDENTIF	<b>ICATION</b>	
INDEPENDENT PUBLIC ACCOUNTANT	-	in this Report*	
	Crowe Horwath, LLP		
	(Name - if individual, state last,	first, middle name)	
124 S. Florida Avenue, Suite	201, Lakeland,	FL	33801
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:			
X Certified Public Accountant			
Public Accountant			
Accountant not resident in U	nited States or any of its poss	essions.	
	FOR OFFICIAL USE (		
	FOR OFFICIAL USE	JIV L I	
<u></u>			

\*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

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

SEC 1410 (06-02)

WB

### OATH OR AFFIRMATION

Ι,	Ralph C. Allen	, swear (or affirm) that, to the best of
my k	nowledge and belief the accompanying t	nancial statement and supporting schedules pertaining to the firm of
	Allen &	Company of Florida, Inc. , as
of	Decem	er 31, 20 16, are true and correct. I further swear (or affirm) that
		or, principal officer or director has any proprietary interest in any account
	ified solely as that of a customer, except	
	,	
		<u> </u>
		A A A =
		Signature
		o gillaturo
		Chairman
	William .	SANDRA J. STORY Title
$\Omega$		Notary Public, State of Florida My comm. expires March 30, 2019
100	endro O Story Notary Public	Commission Number FF 208056
	Trotaly I done	
	report ** contains (check all applicable	oxes):
	a) Facing Page.	
`	b) Statement of Financial Condition. c) Statement of Income (Loss).	
(	d) Statement of Income (Loss).	ndition
		' Equity or Partners' or Sole Proprietors' Capital.
,	f) Statement of Changes in Liabilities S	
	g) Computation of Net Capital.	
□ (i	h) Computation for Determination of Re	erve Requirements Pursuant to Rule 15c3-3.
		or Control Requirements Under Rule 15c3-3.
□ (j		e explanation of the Computation of Net Capital Under Rule 15c3-1 and the
		Reserve Requirements Under Exhibit A of Rule 15c3-3.
⊔ ()	•	and unaudited Statements of Financial Condition with respect to methods of
<b>X</b> ()	consolidation.  An Oath or Affirmation.	
`	m) A copy of the SIPC Supplemental Re	ort
		uacies found to exist or found to have existed since the date of the previous audit.
(-	, P	

<sup>\*\*</sup>For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

## ALLEN & COMPANY OF FLORIDA, INC. Lakeland, Florida

FINANCIAL STATEMENTS December 31, 2016

## ALLEN & COMPANY OF FLORIDA, INC. Lakeland, Florida

#### FINANCIAL STATEMENTS December 31, 2016

### CONTENTS

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM	1
FINANCIAL STATEMENTS	
STATEMENT OF FINANCIAL CONDITION	2
STATEMENT OF INCOME	3
STATEMENT OF CHANGES IN LIABILITIES SUBORDINATED TO CLAIMS OF GENERAL CREDITORS	4
STATEMENT OF CHANGES IN STOCKHOLDER'S EQUITY	5
STATEMENT OF CASH FLOWS	6
NOTES TO FINANCIAL STATEMENTS	7
SUPPLEMENTARY INFORMATIONS	
SCHEDULE I - COMPUTATION OF NET CAPITAL PURSUANT TO RULE 15c3-1	13
SCHEDULE II - COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS FOR BROKER-DEALERS PURSUANT TO RULE 15c3-3	14
SUPPLEMENTARY REPORTS	
EXEMPTION REPORT	15
DEDORT OF INDEDENDANT REGISTERED DURING ACCOUNTING FIRM	16





#### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors of Allen & Company of Florida, Inc. Lakeland. Florida

We have audited the accompanying statement of financial condition of Allen & Company of Florida, Inc., as of December 31, 2016, and the related statements of income, changes in liabilities subordinated to claims of general creditors, changes in stockholder's equity and cash flows for the year then ended. These financial statements are the responsibility of Allen & Company of Florida, Inc.'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. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes 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 Allen & Company of Florida, Inc. as of December 31, 2016, 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.

The Schedule I - Computation of Net Capital Pursuant to Rule 15c3-1 ("Schedule I") and Schedule II - Computation for Determination of Reserve Requirements for Broker-Dealers Pursuant to Rule 15c3-3 ("Schedule II") have been subjected to audit procedures performed in conjunction with the audit of Allen & Company of Florida, Inc.'s financial statements. Schedule I and Schedule II are the responsibility of Allen & Company of Florida, Inc.'s management. Our audit procedures included determining whether Schedule I and Schedule II reconcile 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 Schedule I and Schedule II. In forming our opinion on the Schedule I and Schedule II, we evaluated whether Schedule I and Schedule II, including its form and content is presented in conformity with 17 C.F.R. § 240.17a-5. In our opinion, Schedule I and Schedule II, in all material respects, in relation to the financial statements as a whole.

Crowe Horwath LLP

Crow Houth JJP

Lakeland, Florida February 21, 2017

### ALLEN & COMPANY OF FLORIDA, INC. STATEMENT OF FINANCIAL CONDITION December 31, 2016

Cash \$ 1	000 507
Casii	,060,507
Receivables	
Clearing organization	519,286
Commission	118,882
Employees	60,770
Other	1,677
Securities owned, at fair value (Note 2)	3,092,343
Equipment and leasehold improvements, less accumulated	
	,027,112
Prepaid expenses and other assets	84,189
TOTAL ASSETS \$ 5	,964,766
LIABILITIES AND STOCKHOLDER'S EQUITY	
Liabilities	
Accounts payable and accrued expenses \$	751,771
Commissions payable	291,010
Deferred compensation (Note 4)	750,624
Subordinated borrowings (Note 8)	,057,143
Total liabilities 2	2,850,548
Commitments (Note 5)	
Stockholder's equity	
Class A common stock, \$.10 par, shares authorized,	
1,500,000; issued and oùtstanding, 662,714	66,271
Class B common stock, \$.10 par, shares authorized,	00,271
500,000; issued and outstanding, 171,792	17,179
Additional paid-in capital	728,923
	2,301,845
	3,114,218
Total Stockholder's Equity	,, , , , <u>, , , , , , , , , , , , , , ,</u>
TOTAL LIABILITIES AND STOCKHOLDER'S EQUITY \$ 5	5,964,766

# ALLEN & COMPANY OF FLORIDA, INC. STATEMENT OF INCOME Year ended December 31, 2016

Parameter	
Revenues	© 45.705.444
Commissions	\$ 15,705,411
Other	540,048
Interest and dividends	216,539
Unrealized gain	54,659
Total revenues	16,516,656
Expenses	
Employee compensation and benefits (Note 4)	12,261,190
Occupancy (Notes 5 and 7)	484,594
Clearance and exchange fees	463,749
Repairs and maintenance	392,864
Advertising	307,334
Depreciation expense	139,857
Office expenses	109,519
Legal and professional fees	109,037
Equipment rental	102,465
Charitable contributions	96,904
Other	92,652
Entertainment - Employee and outside	85,279
Dues - Regulatory and organizational	79,354
Corporate insurance	61,113
Training and seminars	59,145
Taxes and licenses	33,952
Communications and data processing	25,818
Interest	15,857
Realized losses on securities	14,280_
Total expenses	14,934,963
Net income	\$ 1,581,693

# ALLEN & COMPANY OF FLORIDA, INC. STATEMENT OF CHANGES IN LIABILITIES SUBORDINATED TO CLAIMS OF GENERAL CREDITORS Year ended December 31, 2016

Subordinated borrowings at January 1, 2016	\$ 1,321,429	
Decreases: Forgiveness of debt	 (264,286)	
Subordinated borrowings at December 31, 2016	\$ 1,057,143	

# ALLEN & COMPANY OF FLORIDA, INC. STATEMENT OF CHANGES IN STOCKHOLDER'S EQUITY Year ended December 31, 2016

	Commo Class A	on stock Class B	Additional paid-in <u>capital</u>	Retained earnings	<u>Total</u>
Balance, January 1, 2016	\$ 66,271	\$ 17,179	\$ 642,664	\$ 2,075,151	\$ 2,801,266
Stock Based Compensation	-		86,259	-	\$ 86,259
Dividend Distribution	-	-	-	(1,355,000)	(1,355,000)
Net Income		<del>-</del>	· 	\$ 1,581,693	1,581,693
Balance, December 31, 2016	\$ 66,271	\$ 17,179	\$ 728,923	\$ 2,301,845	\$ 3,114,218

### ALLEN & COMPANY OF FLORIDA, INC. STATEMENT OF CASH FLOWS Year ended December 31, 2016

Cash flows from operating activities	
Net income	\$ 1,581,693
Adjustments to reconcile net income to net change in	
operating activities	
Depreciation expense	139,857
Forgiveness of debt	(264,286)
Change in assets and liabilities	
Receivables	97,723
Securities owned, net	59,947
Prepaid expenses and other assets	20,262
Accounts payable and accrued expenses	(146,615)
Commissions payable	5,610
Deferred compensation	 187,300
Net change in operating activities	1,681,492
Cash flows from investing activities	
Purchases of equipment	(382,262)
Cash flows from financing activities	
Dividend distribution	 (1,355,000)
Net change in financing activities	 (1,355,000)
Net change in cash	(55,771)
Cash at beginning of year	 1,030,018
Cash at end of year	\$ 1,060,507

#### **NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

<u>Business Activity</u>: Allen & Company of Florida, Inc. (the Company) is a fully disclosed introducing broker-dealer, clearing through First Clearing Corporation, registered with the Securities and Exchange Commission (SEC) and a member of the Financial Industry Regulatory Authority (FINRA). The Company is a wholly-owned subsidiary of Allen & Company Financial Corporation (ACFC).

<u>Use of Estimates</u>: The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Actual results could differ from those estimates.

<u>Securities Transactions</u>: Securities transactions and related commission revenues and expenses are recognized on the trade date.

Receivables: The Company grants credit to its clearing organization and other companies in the financial services industry that it does business with. The Company also routinely grants credit to its officers, employees and affiliated companies. Interest is not normally charged on receivables. An allowance for uncollectible accounts is estimated and recorded based on management's judgment. At December 31, 2016, all receivables are considered collectible and no allowance is required.

<u>Securities Owned:</u> Securities owned are carried at fair value. Fair value generally represents publicly quoted values or amounts that approximate quoted values for securities of comparable credit quality. At year-end, these securities consisted primarily of publicly traded equities.

<u>Equipment and Leasehold Improvements</u>: Equipment is stated at cost and depreciated using either the straight-line or accelerated methods over the estimated useful lives of the assets. Leasehold improvements are depreciated using the straight-line method over the shorter of the useful life or the life of the lease.

<u>Advertising</u>: Advertising costs are expensed as incurred. Total advertising expense was \$307,334 for the year ended December 31, 2016.

Income Taxes: The Company's net income (loss) is included in the tax return of ACFC. ACFC has elected to be taxed as an S corporation. A tax position is recognized as a benefit only if it is "more likely than not" that the tax position would be sustained in a tax examination, with a tax examination being presumed to occur. The amount recognized is the largest amount of tax benefit that is greater than 50% likely of being realized on examination. For tax positions not meeting the "more likely than not" test, no tax benefit is recorded.

The Company recognizes interest and penalties related to unrecognized tax benefits in interest and income tax expense, respectively. The Company has no amounts accrued for interest or penalties as of December 31, 2016.

Due to its pass-through status, the Company is not subject to U.S. federal and income tax or state income tax. The Company does not expect the total amount of unrecognized tax benefits to significantly change in the next 12 months. Allen & Company Financial Corporation's U.S. federal and State of Florida returns that remain open and subject to exam are those for the years 2013, 2014 and 2015. Tax years prior to 2013 are no longer subject to examination by taxing authorities.

(Continued)

#### NOTE 1 - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

<u>Loss Contingencies</u>: Loss contingencies, including claims and legal actions arising in the ordinary course of business, are recorded as liabilities when the likelihood of loss is probable and an amount or range of loss can be reasonably estimated.

The Company, under the correspondent clearing agreement with its clearing agent, has agreed to indemnify the clearing agent from damages or losses resulting from customer transactions. The Company is, therefore, exposed to off-balance-sheet risk of loss in the event that customers are unable to fulfill contractual obligations including their obligations under margin accounts. The Company's management believes any loss exposure is not material, and accordingly, the Company has not recorded any contingent liability in its financial statements.

Management does not believe there now are such matters that will have a material effect on the financial statements.

Concentration of Credit Risk: The Company maintains cash deposits in excess of the limit insured by the Federal Deposit Insurance Corporation (FDIC). Management believes the risk is managed by maintaining all deposits in high quality financial institutions.

#### **NOTE 2 - FAIR VALUE**

FASB ASC 820, Fair Value Measurements and Disclosures, defines fair value as the price that would be received for an asset or paid to transfer a liability (an exit price) in the Company's principal or most advantageous market for the asset or liability in an orderly transaction between market participants on the measurement date. FASB ASC 820 establishes a fair value hierarchy which requires an entity to maximize the use of observable inputs and minimize the use of unobservable inputs when measuring fair value. The standard describes three levels of inputs that may be used to measure fair value:

- Level 1: Quoted prices (unadjusted) for identical assets or liabilities in active markets that the entity has the ability to access as of the measurement date.
- Level 2: Significant other observable inputs other than Level 1 prices such as quoted prices for similar assets or liabilities; quoted prices in markets that are not active; or other inputs that are observable or can be corroborated by observable market data.
- Level 3: Significant unobservable inputs that reflect a reporting entity's own assumptions about the assumptions that market participants would use in pricing an asset or liability.

The fair values of mutual funds are determined by obtaining quoted prices on nationally recognized securities exchanges (Level 1 inputs).

### NOTE 2 - FAIR VALUE (Continued)

#### Assets and Liabilities Measured on a Recurring Basis

Assets and liabilities measured at fair value on a recurring basis are summarized below:

	Fair Value Measurements at December 31, 2016 Using			
	Quo	ted Prices in	Sig	nificant
	Act	tive Markets	(	Other
	fc	r Identical	Obs	ervable
		Assets		nputs
		(Level 1)	<u>(L</u>	evel 2)
Securities owned				
Mutual funds				
Money market funds	\$	977,795	. \$	· <b>-</b>
International		580,380		-
Domestic - Municipal		526,219		-
Domestic - Growth		458,544		-
Domestic - Blend		234,031		-
Domestic - Value		160,588		
Bond index		66,320		-
Domestic - Commodities		44,497		-
Domestic - Real Estate		43,968		<u> </u>
	\$	3,092,343	\$	•

#### **NOTE 3 - EQUIPMENT AND LEASEHOLD IMPROVEMENTS**

Major classes of equipment and leasehold improvements consist of:

Leasehold improvements	\$	1,664,992
Furniture and equipment		602,348
Computer equipment		<b>288,7</b> 13
		2,556,053
Less accumulated depreciation	_	<u>1,528,941</u>
	\$	1.027.112

#### **NOTE 4 - EMPLOYEE BENEFITS**

The Company sponsors a 401(k) savings plan covering all eligible employees. Employees may contribute up to 100 percent of their eligible compensation to the plan, subject to the limits of Section 401(k) of the Internal Revenue Code. Due to the creation of the Allen & Company Employee Stock Ownership Plan (ESOP) in 2012, the Company chose to discontinue its matching contributions to the plan effective on February 1, 2013. See Note 9 for additional information regarding the ESOP.

The Company has a non-qualified deferred compensation agreement with an employee that provides for specified future payments annually through 2023. The Company has recognized a liability of \$131,100 at December 31, 2016, representing the future payments under the agreement.

The Company has another non-qualified deferred compensation plan with an employee that provides for payments upon the employee's death, disability or attainment of the normal retirement age. The Company has recognized a liability of \$619,524 at December 31, 2016, representing the future payments under the agreement.

In 2011, the Company entered into an agreement with certain employees where the Company will accrue a certain amount each year based on Company operations which will be paid in full to the employee during the year ending 12/31/2018 as long as they remain employed through December 31, 2017. At December 31, 2016, the Company has accrued \$191,486 which is included in accounts payable in accrued expenses on the accompanying statement of financial condition. The company expensed \$30,600 related to this agreement for the year ended December 31, 2016, which is included in the employee compensation and benefits in the accompanying statement of income.

#### **NOTE 5 - LEASES**

The Company leases its Lakeland (Note 7), Winter Haven and Viera, Florida offices, a vehicle, and various other office equipment under noncancelable operating leases.

Future minimum rental payments required under leases that have initial or remaining noncancelable terms in excess of one year are approximately as follows:

2017	\$ 430,078
2018	404,669
2019	400,356
2020	405,535
2021	325,463
Thereafter	<u>934,636</u>

\$ 2,900,737

Total rent and occupancy expense recognized in the accompanying statement of income for the year ended December 31, 2016 was \$484,594.

#### **NOTE 6 - NET CAPITAL REQUIREMENTS**

The Company is subject to the Securities and Exchange Commission Uniform Net Capital Rule (SEC Rule 15c3-1), which requires the maintenance of minimum net capital. SEC Rule 15c3-1 also requires that the ratio of the Company's aggregate indebtedness to net capital shall not exceed 15 to 1. At December 31, 2016, the Company had net capital of \$2,660,875. The required minimum net capital was \$250,000. The Company's aggregate indebtedness to net capital ratio was 67.4% at December 31, 2016.

#### **NOTE 7 - RELATED PARTY TRANSACTIONS**

The Company provides advances to its employees which are payable to the Company over a period of time through payroll deductions. The advances are interest bearing. The balance of employee advances at December 31, 2016 is \$38,749.

The Company has one note receivable from an employee. The note is non-interest bearing and is being forgiven through a service credit earned each month of employment that is equal to the monthly payment that would otherwise be due. The note is due in July 2017. The balance of the note receivable at December 31, 2015 is \$22,021.

The Company leases its Lakeland office from a partnership controlled by an officer of the Company. The lease is currently payable \$21,737 monthly and contains annual escalation provisions. Rent expense related to the Lakeland office included in the accompanying income statement was \$253,241 for the year ended December 31, 2016. The lease expires in December 2024.

#### **NOTE 8 - AUCTION RATE PREFERRED SECURITIES**

In October 2012, the Company's clients owned \$9,175,000 worth of auction rate preferred securities ("ARPs"). Those ARPs had been illiquid since February 2008. The Company purchased ARPs from their clients and then sold the purchased ARPs, resulting in a difference between par value and the bid, which would be the loss associated with each ARP.

The Company's clearing organization agreed to provide a subordinated loan to pay for approximately 85% of that loss with the Company assuming the remaining 15% of the loss. The Company entered into a subordinated loan agreement with their clearing organization in order to fund the purchase of the ARPs from the clients. Since the loan is subordinated, it is not considered part of aggregated indebtedness for net capital computation. The subordinated loan agreement is a forgivable loan over seven years with an adjustable interest rate of prime minus 1.50%. The debt forgiveness requires the Company to perform under the terms of the agreement including a continued relationship with the clearing firm. The Company records the debt forgiveness on a straight-line basis of one-seventh per year, or \$264,286, for each of the years for 2014 through 2020, which is included in other revenue in the accompanying statement of income. This amount will differ slightly from the annual change in the termination amounts listed below. Interest is payable annually. There are no payments due on the loan; however, the Company would be required to pay an amount in the event they cancelled their clearing agreement with their clearing organization.

The amount due in the event of termination is as follows:

Termination on or prior to		
February 28, 2014	\$	1,850,000
February 28, 2015		1,600,000
February 28, 2016		1,350,000
February 28, 2017		1,100,000
February 28, 2018		850,000
February 28, 2019	,	600,000
February 28, 2020		350,000

#### **NOTE 9 - EMPLOYEE STOCK OWNERSHIP PLAN**

ACFC created a leveraged employee stock ownership plan ("ESOP") in December 2012 that covers substantially all employees of the Company who are over twenty-one (21) years of age and have completed one year of service. They must also have 1,000 hours of service during that one-year period. On December 26, 2012, the ESOP purchased 1,014,681 shares of the ACFC's common stock from a shareholder for \$2,100,390. The purchase of these shares was funded by two notes payable ("ESOP notes payable") to the shareholder and the bank from the ESOP and these notes payable have since been paid in full. The ESOP notes payable between the ESOP and the ACFC's shareholder and bank are a direct obligation of ACFC as the sponsor of the ESOP. As of December 31, 2015, this note payable to the ACFC shareholder had been paid in full.

On September 27, 2016, the ESOP purchased 710,900 shares of the ACFC's common stock from a shareholder for \$1,499,999. The purchase of these shares was funded by two notes payable ("ESOP notes payable 2") to the shareholder and the bank from the ESOP in the amount of \$1,499,999. The ESOP notes payable between the ESOP and the ACFC's shareholder and bank are a direct obligation of ACFC as the sponsor of the ESOP.

The ESOP provides for discretionary contributions by ACFC that are at least equal to the ESOP's debt service. As the debt is repaid, shares are released from the suspense account based on the proportion of the principal and interest paid in the year on the outstanding balance of principal, plus interest, due on the debt and are allocated to active employees. Contributions were allocated in 2016 based on the payments made in 2015. The total cost of the allocated shares was \$582,200. In 2016, ACFC contributed \$398,757 for principal and interest payments on the outstanding loan balances associated with the ESOP. ACFC receives money from the Company via distributions to fund the contributions. The fair market value of the ESOP shares is determined on an annual basis by an independent appraisal. The value as of August 31, 2016 was \$2.11 per share.

#### **NOTE 10 - INCENTIVE STOCK OPTION PLAN**

In 2013, the Company created an Incentive Stock Option Plan (ISO) to allow selected key members of the Company an option to purchase Class B non-voting common stock of the Company. As of December 31, 2016, the Company has granted the option to purchase up to 200,000 shares at a price of \$1.74 to one employee. In 2016, there were 200,000 options for shares of Class B non-voting stock that could be exercised. Any options not exercised in the first year in which they are permitted to be exercised may be exercised in subsequent years, until they expire on August 18, 2023. For year ending December 31, 2016 there were no additional grants. At year-end, no shares have been exercised. The Company has recognized stock based compensation expense in the amount of \$86,259 for the year ending December 31, 2016, which has been recorded as additional paid-in capital and included in employee compensation and benefits in the accompanying statement of income.



# ALLEN & COMPANY OF FLORIDA, INC. SCHEDULE I - COMPUTATION OF NET CAPITAL PURSUANT TO RULE 15c3-1 December 31, 2016

Total stockholder's equity	\$	3,114,218
Add Liabilities subordinated to claims of general creditors allowable in computation		1,057,143
Deduct Non-allowable assets		1,173,748
Net capital before haircuts on securities positions		2,997,613
Deduct Investment securities haircuts		336,738
Net capital	<u>\$</u>	2,660,875
Computation of net capital requirement - Minimum net capital required	\$	250,000
Excess net capital	<u>\$</u>	2,410,875
Aggregate indebtedness .	<u>\$</u>	1,793,405
Ratio of aggregate indebtedness to net capital		<u>67.4</u> %

There are no material differences between the amounts reported above and the amended FOCUS report for the year ended December 31, 2016 filed on February 21, 2017.

The amended FOCUS report filed on February 21, 2017, differs from the original unaudited FOCUS report filed on January 20, 2017, primarily as a result of audit adjustments related to the accrual of bonuses. A reconciliation of amounts reported in the original FOCUS report to amounts reported in the amended FOCUS report for the year ended December 31, 2016 is provided below:

	er Original CUS Report	 ect of Audit justments	 r Amended CUS Report
Total stockholder's equity	\$ 3,311,604	\$ (197,386)	\$ 3,114,218
Net capital	2,858,261	(197,386)	2,660,875
Excess net capital	2,608,261	(197,386)	2,410,875
Aggregate indebtedness	1,477,137	316,268	1,793,405
Ratio of aggregate indebtedness to net capital	52%	15%	67%

#### ALLEN & COMPANY OF FLORIDA, INC.

# SCHEDULE II - COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS FOR BROKER-DEALERS PURSUANT TO RULE 15c3-3 December 31, 2016

Allen & Company of Florida, Inc. (the "Company") is not required to compute the Reserve Requirements or include Information Relating to the Possession or Control Requirements pursuant to Rule 15c3-3 under the Securities Exchange Act of 1934 (the "Rule"), in that the Company's activities are limited to those set forth in the conditions for exemption appearing in paragraph (k)(2)(i) and paragraph (k)(2)(ii) of the Rule. For purposes of paragraph (k)(2)(ii) all customer transactions are cleared through First Clearing Corporation, LLC, on a fully disclosed basis.

**SUPPLEMENTAL REPORTS** 



1401 South Florida Avenue | Lakeland, FL 33803 p. 863.688.9000 f. 863.616.6354 toll free 800.950.2526 alleninvestments.com Member FINRA/SIPC

#### **EXEMPTION REPORT**

Allen & Company of Florida, 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:

- (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):
- (k)(2)(i) Allen & Company maintained a "Special Account for the Exclusive Benefit of customer.
- (k)(2)(ii) All customer transactions cleared through First Clearing Corporation, LLC, another broker-dealer on a fully disclosed basis.
- (2) The Company met the identified exemption provisions in 17 C.F.R. § 240.15c3-3(k) throughout the fiscal year ended December 31, 2016, without exception.

Allen & Company of Florida, Inc.

ا, <u>M،chael Walker,</u> swear (or affirm) that, to my best knowledge and belief, this Exempl	tion Report
is true and correct.	
BV: Michel Waller	

Title:

Vice President & CFO

2/21/17





#### REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors of Allen & Company of Florida, Inc. Lakeland, Florida

We have reviewed management's statements, included in the accompanying Allen & Company of Florida, Inc. Exemption Report, in which (1) Allen & Company of Florida, Inc. identified the following provisions of 17 C.F.R. § 15c3-3(k) under which Allen & Company of Florida, Inc. claimed an exemption from 17 C.F.R. § 240.15c3-3(k): (2)(i) and (2)(ii), (the "Exemption Provisions") and (2) Allen & Company of Florida, Inc. stated that Allen & Company of Florida, Inc. met the identified exemption provisions throughout the fiscal year ended December 31, 2016, without exception. Allen & Company of Florida, Inc.'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 Allen & Company of Florida, Inc.'s compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

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

Crowe Horwath LLP

Crown Hounth 11P

Lakeland, Florida February 21, 2017

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION

### FORM X-17A-5

### **FOCUS REPORT**

# (FINANCIAL AND OPERATIONAL COMBINED UNIFORM SINGLE REPORT) PART IIA 12

	(Please read instructions before preparing Form)	
This report is 1) Rule	rig filed pursuant to (Check Applicable Block(s)): 2-5(a) 16 2) Rule 17a-5(b) 17 3) Rule 17a-11  Special request by designated examining authority 19 5) Other 26	18
NAME OF BROKE	PEALER SEC. FILE NO.	
ALLEN & COMPANY ADDRESS OF PR	FLORIDA, INC. 13 8-09877  FIRM ID NO. 25	14
1401 SOUTH FLOR	FOR PERIOD BEGINNIN  (No. and Street)  10/01/16  AND ENDING (MM/DD/Y	NG (MM/DD/YY)
_AKELAND((	21 FL 22 33803 23 12/31/16	[25]
NAME AND TELE	ONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT(Area code) - Telepho	one No.
Kristen Benton NAME(S) OF SUE	IARIES OR AFFILIATES CONSOLIDATED IN THIS REPORT OFFICIAL US	31 E
	32 34 36	33 35 37
	DOES RESPONDENT CARRY ITS OWN CUSTOMER ACCOUNTS?  CHECK HERE IF RESPONDENT IS FILING AN AUDITED REPORT	NO X 41 42
	EXECUTION: The registrant/broker or dealer submitting this Form and its attachments and the person(s) it is executed represent hereby that all information contained therein is true, correct and of this understood that all required items, statements, and schedules are considered integrating from and that the submission of any amendment represents that all unamended item and schedules remain true, correct and complete as previously submitted.	complete.
	Dated the day of 20 Manual Signatures of:	
	Principal Executive Officer or Managing Partner  2)	
	Principal Financial Officer or Partner  3)  Principal Operations Officer or Partner	
	ATTENTION - Intentional misstatements or omissions of facts constitute Federal Criminal Violations. (See 18 U.S.C. 1001 and 15 U.S.C. 78:f (a)	

**FINRA** 

	BROKER OR DEALER			ļ			
	ALLEN & COMPANY OF FLORIDA, INC.		N	3			100
	STATEMENT OF FINANCIAL CONDIT	ION FOR NONCARE	37!V	JG 1	NONCLEARING	AND	, ,,,,,
		R BROKERS OR DE			10.1022/11.1110	7.110	
	32.W.W. 311.2.				as of (MM/DD/Y)	Y) 12/31/16	99
					SEC FILE NO.		
					SEC FILE NO.	8-09877	98
					Consolidate	d <u>19</u>	<u>·8</u>
					Unconsolidate	d <u>x</u> 19	19
		ASSETS					
		Allowable			Non-Allowable	_Tota	<u>al</u>
I. Ca	sh\$	1,060,507 200	0			\$	1,060,507 750
. Re	eivables from brokers or dealers:						
A.	Clearance account		5				
	Other				22,021 550		660,189 810
	eivables from non-customers	35	5		40,426 600		40,426 830
	surities and spot commodities owned, at market value:						
	Exempted securities	410	_				
	Debt securities	419	=				
	Options Other securities	3,092,343 424	_				
	Spot commodities		_				3,092,343 850
	curities and/or other investments not readily marketable:		_				
	At cost \$ 130						
	At estimated fair value	44	ጠ		610	1	860
	curities borrowed under subordination agreements		<u> </u>		[0.10]		
	and partners' individual and capital						
	ecurities accounts, at market value:	460	0 _		630		880
A.	Exempted						
	securities \$150						
В.	Other						
7 00	securities \$	47	n		640	l	890
	rket value of collateral:	[-71]	<u> </u>		10-10		
	Exempted						
,,	securities \$ [170]						
В	Other						
	securities \$180						
В. <b>М</b> е	mberships in exchanges:						
Α	Owned, at						
ь	market \$				650	1	
	Owned, at cost		-				
_	at market value		-		660		900
9. Inv	estment in and receivables from						
afl	iliates, subsidiaries and	_	_		<del></del>	,	
	sociated partnerships	48	0		670	]	910
	roperty, furniture, equipment,						
	leasehold improvements and rights under lease agreements, at cost-net						
	of accumulated depreciation					_	_
	and amortization.	49			1,027,112 680		1,027,112 920
11. C	ther assets	53			84,189 735		84,189 930
12.7	otal Assets	4,791,018 54	<u> 0</u> ]\$_		1,173,748 740	\$	5,964,766 940
		Page 1				OMIT PE	NNIES

BROKER OR DEALER		
ALLEN & COMPANY OF FLORIDA, INC.	as of	12/31/16

# STATEMENT OF FINANCIAL CONDITION FOR NONCARRYING, NONCLEARING AND CERTAIN OTHER BROKERS OR DEALERS LIABILITIES AND OWNERSHIP EQUITY

LIABILI	HES AND OWNERS	SHIP EQUITY	
	A.I.	Non-A.I.	Total
Liabilities	Liabilities	Liabilities	<del> </del>
<del></del>	Liabilitio	Liabilitado	
13. Bank loans payable\$	1045 \$	1255 \$	1470
14. Payable to brokers or dealers:			
A. Clearance account	1114	1315	1560
B. Other	291,010 1115	1305	291,010 1540
15. Payable to non-customers	63,125 1155	1355	63,125 1610
16. Securities sold not yet purchased,			
at market value		1360	1620
17. Accounts payable, accrued liabilities,			
expenses and other	497,160 1205	1385	497,160 1685
18. Notes and mortgages payable:	<del></del>		
A. Unsecured	1210		1690
B. Secured	1211	1390	1700
19. Liabilities subordinated to claims			
of general creditors:			
A. Cash borrowings:		1,057,143 1400	1,057,143 1710
1. from outsiders \$1,057,143 970			
2. Includes equity subordination (15c3-1(d))			
of \$ 980			
B. Securities borrowings, at market value	_	1410	1720
from outsiders \$ 990			
C. Pursuant to secured demand note			
collateral agreements	_	1420	1730
1. from outsiders \$			
2. includes equity subordination (15c3-1(d))			
of \$1010			
D. Exchange memberships contributed for			
use of company, at market value	_	1430	1740
E. Accounts and other borrowings not	·		
qualified for net capital purposes	942,110 1220	1440	942,110 1750
20. TOTAL LIABILITIES\$	1,793,405 1230 \$	1,057,143 1450 \$	2,850,548 1760
Ownership Equity			
		•	
21. Sole proprietorship			1770
22. Partnership (limited partners)	1020		1780
23. Corporation:			[ <del></del> -
A. Preferred stock			1791
B. Common stock		*****************	83,450 1792
C. Additional paid-in capital	, , , ,		728,923 1793
D. Retained earnings	• • • • • • • • • • • • • • • • • • • •		2,301,845 1794
E. Total	• • • • • • • • • • • • • • • • • • • •	·····	3,114,218 1795
F. Less capital stock in treasury		(	)1796
			3,114,218 1800
25. TOTAL LIABILITIES AND OWNERSHIP EQUITY			5,964,766 [1810]

OMIT PENNIES

BROKER OR DEALER		
ALLEN & COMPANY OF FLORIDA, INC.	as of	12/31/16

#### COMPUTATION OF NET CAPITAL

1. Total ownership equity from Statement of Financial Condition	\$ 3,114,218 3480
Deduct ownership equity not allowable for Net Capital	( )3490
3. Total ownership equity qualified for Net Capital	3,114,218 3500
4. Add:	
A. Liabilities subordinated to claims of general creditors allowable in computation of net capital	1,057,143 3520
B. Other (deductions) or allowable credits (List)	3525
5. Total capital and allowable subordinated liabilities	\$ 4.171,361 3530
6. Deductions and/or charges:	
A. Total non-allowable assets from	
Statement of Financial Condition (Notes B and C)\$ 1,173,748 3540	
B. Secured demand note deficiency	
C. Commodity futures contracts and spot commodities-	
proprietary capital charges3600	
D. Other deductions and/or charges	(1,173,748)[3620]
7. Other additions and/or allowable credits (List)	3630
8. Net Capital before haircuts on securities positions	\$ 2,997,613 3640
9. Haircuts on securities (computed, where appliicable,	
pursuant to 15c3-1(f)):	
A. Contractual securities commitments\$ 3660	
B. Subordinated securities borrowings	
C. Trading and investment securities:	
1. Exempted securities	
2. Debt securities	
3. Options <u>3730</u>	
4. Other securities	
D. Undue concentration 3650	
E. Other (List)	(336,738) 3740
10. Net Capital	\$ 2,660,875 3750

OMIT PENNIES

BROKER OR DEALER		
ALLEN & COMPANY OF FLORIDA, INC.	as of	12/31/16

#### COMPUTATION OF BASIC NET CAPITAL REQUIREMENT

#### Part A

T GIV
11. Minimum net capital required (6-2/3% of line 19)  12. Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital requirement  \$ 119,560 3756
of subsidiaries computed in accordance with Note (A) \$ 250,000 3758
13. Net capital requirement (greater of line 11 or 12) \$\$
14. Excess net capital (line 10 less 13) \$ 2,410,875 3770
15. Net capital less greater of 10% of line 19 or 120% of line 12
COMPUTATION OF AGGREGATE INDEBTEDNESS
16. Total A.I. liabilities from Statement of Financial Condition \$1,793,405 3790
17. Add:
A. Drafts for immediate credit \$3800
B. Market value of securities borrowed for which no
equivalent value is paid or credited\$
C. Other unrecorded amounts (List) \$ 3820 \$
19. Total aggregate indebtedness \$ 1,793,405 \(\frac{1}{3840}\)
20. Percentage of aggregate indebtedness to net capital (line 19 divided by line 10) % 67.40 3850
21. Percentage of debt to debt-equity total computed in accordance with Rule 15c-3-1(d) % 25.34 [3860]
20.04 (0000)
COMPUTATION OF ALTERNATE NET CAPITAL REQUIREMENT
Part B
22. 2% of combined aggregate debit items as shown in Formula for Reserve Requirements pursuant
to Rule 15c3-3 prepared as of the date of net capital computation including both brokers or dealers and consolidated subsidiaries' debits \$
23. Minimum dollar net capital requirement of reporting broker or dealer and minimum net capital
requirement of subsidiaries computed in accordance with Note (A) \$
24. Net capital requirement (greater of line 22 or 23) \$ 3760
25. Excess net capital (line 10 less 24) \$ 3910
26. Net capital in excess of the greater of:
5% of combined aggregate debit items or 120% of minimum net capital requirement

#### NOTES:

- (A) The minimum net capital requirement should be computed by adding the minimum dollar net capital requirement of the reporting broker dealer and, for each subsidiary to be consolidated, the greater of:
  - 1. Minimum dollar net capital requirement, or
  - 2. 6-2/3% of aggregate indebtedness or 4% of aggregate debits if alternative method is used.
- (B) Do not deduct the value of securities borrowed under subordination agreements or secured demand notes covered by subordination agreements not in satisfactory form and the market values of the memberships in exchanges contributed for use of company (contra to item 1740) and partners' securities which were included in non-allowable assets.
- (C) For reports filed pursuant to paragraph (d) of Rule 17a-5, respondent should provide a list of material non-allowable assets.

		For the period (MMDDYY) from 10/01/16	2022	to.	10/04/12	
		Number of months included in this statement	3932	to	12/31/16 3	3933 3931
				•		
REVENUE	STATE	EMENT OF INCOME (LOSS)				
Commissions:						
a. Commissions on transactions in exchange	listed equity	securities executed on an exchange			. \$	224,936
c. Commissions on listed option transactions		• • • • • • • • • • • • • • • • • • • •				3,604
: All other securities commissions		• • • • • • • • • • • • • • • • • • • •				17,851
Total securities commissions     Gains or losses on firm securities trading ac		•••••••••••		• • •	·	246,391
a. From market making in options on a nation		exchange				
- ·		exchange				
					·	
Profits (losses) from underwriting and selling	-	***************************************				
Revenue from sale of investment company s						2,198,343
Fees for account supervision, investment ad	visory and a	dministrative services	• • • • • • • •	• • •		1,654,603
						284,144
Total revenue					. \$	4,383,481
<ol> <li>Salaries and other employment costs for go</li> <li>Other employee compensation and benefits</li> </ol>	•	· · · · · · · · · · · · · · · · · · ·			<del></del>	3,389,320
. Commissions paid to other brokers-dealers		,				48,729
3. Interest expense						3,964
a. Includes interest on accounts subject to su	bordination	agreements	3.964	4070	]	
Regulatory fees and expenses						25,035
5. Other expenses		. , , ,				606,668
5. Total expenses					\$	4,073,716
ET INCOME						
ET INCOME  7. Net Income (loss) before Federal income to	exes and items	below (Item 9 less Item 16)			. \$	309,765
3. Provision for Federal income taxes (for par		to the state of th				509,100
Equity in earnings (losses) of unconsolidate	• •					
				4238	]	
. Extraordinary gains (losses)			<del></del> '			
a. After Federal income taxes of			Γ	4239	1	
. Cumulative effect of changes in accounting					<b>.</b>	(39,701)
2. Net income (loss) after Federal income tax					s	270,064
2. The modified floory after a decide modified tax	on on on	ereniery nomice of the control of th			<u> </u>	210,004
IONTHLY INCOME 3. Income (current month only) before provisi	on for Federal	Income taxes and extraordinary items				(114,303)
a a form our more only boloro broston						(114,503)

BROKER OR DEALER				
ALLEN & COMPANY OF FLORIDA, INC.				
	For the period (MMDDYY) from	10/01/16	to	12/31/16

STATEMENT OF CHANGES IN OWNERSHIP E		
(	,	
1. Balance, beginning of period		3,632,895 4240
A. Net income (loss)	<u> </u>	270,064 4250
B. Additions (includes non-conforming capital of	4262 )	86,259 4260
C. Deductions (includes non-conforming capital of\$	4272 )	875,000 4270
2. Balance, end of period (from item 1800)	\$	3,114,218 4290
STATEMENT OF CHANGES IN LIABILITIES SUBO	RDINATED	
TO CLAIMS OF GENERAL CREDITORS	101111120	
TO GEALING OF GENERAL GREDITORIO		
3. Balance, beginning of period	\$	1,057,143 4300
A. Increases		4310
B. Decreases		4320
4. Balance, end of period (from item 3520)		1.057 143 4330

BROKER OR DEALER		
ALLEN & COMPANY OF FLORIDA, INC.	as of	12/31/16

	, -					
	Exemptive	Provision	n Under Rule	15c3-3		
25. If an exem	otion from Rule 15c3-3 is claimed, identify below	the sectio	n upon which suc	ch exemption is based :		
A. (k) (1) - Lii	mited business (mutual funds and/or variable ar	nuities only	<i>(</i> )		\$	4550
B. (k) (2) (i) -	"Special Account for the Exclusive Benefit of cu	ustomers" n	naintained		<u>x</u>	4560
C. (k) (2) (ii)	All customer transactions cleared through ano	ther broker-	dealer on a fully	disclosed basis.		
Name	e(s) of Clearing Firm(s) - Please separate multiple	names v	vith a semi-colon			
We	lls Fargo Clearing Services, LLC			43:	35 <u>x</u>	4570
D. (k) (3) - Ex	empted by order of the Commission					4580
Type of Propo Withdrawal of Accrual (See below for code to ente	or or	ted in the	Insider or Outsider ? (In or Out)	of Net Capital.  Amount to be withdrawn (cash amount and/or Net Capital Value of Securities)	(MMDDYY) Withdrawal or Maturity Date	Expect to Renew (Yes or No)
	600	4601	4602	4603	4604	4605
	610	4611	4612	4613	4614	4615
	620	4621	4622	4623	4624	4625
4	630	4631	4632	4633	4634	4635
4	640	4641	4642	4643	4644	4645
4	650	4651	4652	4653	4654	4655
4	660	4661	4662	4663	4664	4665
4	670	4671	4672	4673	4674	4675
	680	4681	4682	4683	4684	4685

TOTAL \$ 4699

4692

**OMIT PENNIES** 

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4695

Instructions: Detail listing must include the total of items maturing during report date, regardless of whether or not the capital contribution is expected to be renewed. The schedule must also include proposed capital withdrawals scheduled within the six month period following the report date including the proposed redemption of stock and payments of liabilities secured by fixed assets (which are considered pursuant to Rule 15c3-1(c) (2) (iv)), which could be required by the lender on demand or in less than six months.

4691

#### WITHDRAWAL CODE: DESCRIPTION

1. Equity Capital

4690

- 2. Subordinated Liabilities
- 3. Accruals
- 4. 15c3-1(c) (2) (iv) Liabilities

# UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

FORM

### **FOCUS REPORT**

(FINANCIAL AND OPERATIONAL COMBINED UNIFORM SINGLE REPORT)

Schedule I

INFORMATION REQUIRED OF BROKERS AND DEALERS PURSUANT TO RULE 17a-5

	port for the Cale if less than 12 i			ır <u>2</u>	2016 8004				
Report for the period beginning	8005	an	d ei	ndir	ng	8006			
MM D	DYY				MM DD YY				
						SEC FILE I	NUM	BER	]
						8-09877			8011
1. NAME OF BROKER DEALER					OFFICIAL	USE ONLY			
ALLEN & COMPANY OF FLORIDA, INC.		8020	N	9					
					Firm No	ММҮҮ			
2. Name(s) of broker-dealer(s) merging with	respondent durin	g re	port	ing	period:				
					OFFICIAL U	SE ONLY			
NAME :		8053							8057
NAME:		8054		-				_	8058
NAME :		8055		-				-	8059
NAME :		8056		L					8060
3. Respondent conducts a securities busines	ss exclusively with		_		broker-dealers:				¬
		(en	ter a	appi	icable code: 1=`	res 2=No)	L	2	8073
Respondent is registered as a specialist of the special state.	n a national se	curitie (en			nge: icable code: 1= <b>`</b>	res 2=No)		2	8074
5. Respondent makes markets in the following	ng securities:								
(a) equity securities		(en	ter a	appl	icable code: 1=\	res 2=No)		2	8075
(b) municipals		(en	ter a	appl	icable code: 1=	res 2=No)	L	2	8076
(c) other debt instruments		(en	tera	appl	icable code: 1=	Yes 2=No)		2	8077
6. Respondent is registered solely as a mun	icipal bond dealer								¬
		(en	ter a	appl	icable code: 1=	Yes 2=No)		2	8078
7. Respondent is an insurance company or a	an affiliate of an				mpany: icable code: 1=	Yes 2=No)		2	8079
8. Respondent carries its own public custom	er accounts:	(en	iter	appl	icable code: 1=	Yes 2=No)		2	8084
9. Respondent's total number of public custo	mer accounts:								
(carrying firms filing X-17A-5 Part II only)									¬
` '									8080
(b) Omnibus accounts									8081
10. Respondent clears its public customer a	nd/or proprietary	acco			isable sede: 4-1	Vac 2=Na\	_		0005
		(er	iter i	appi	icable code: 1=	tes 2=N0)	Ц	2	8085

## FOCUS REPORT

# Schedule I page 2

11. Respondent clears its public customer accounts in the following	ng manner:	
	(enter a "1" in appropriate boxes)	
(a) Direct Mail (New York Stock Exchange Members Only)		8086
(b) Self-Clearing		8087
(c) Omnibus		8088
(d) Introducing		1 8089
(e) Other		8090
If Other please describe:		
(f) Not applicable		8091
12.(a) Respondent maintains membership(s) on national securities	es exchanges(s):	
(er	nter applicable code 1=Yes 2=No)	2 8100
• • • • • • • • • • • • • • • • • • • •	dent maintains memberships: in appropriate boxes)	
(1) NYSE AMEX, LLC		8120
(2) Boston	<u>=</u>	8121
(3) CBOE	<u>=</u>	8122
(4) Midwest	<u>==</u>	8123
(5) New York	<u>=</u>	8124
(6) Philadelphia		8125
(7) Pacific Coast		8126
(8) Other	=	8129
13. Employees:		
(a) Number of full-time employees		69 8101
(b) Number of full-time registered representatives employed by	respondent included in 13(a)	60 8102
14. Number of NASDAQ stocks respondent makes market		8103
15. Total number of underwriting syndicates repondent was a men	mber	8104
Carrying or clearing firms filing X-	-17A Part II)	
•	Actual	8105 8106
(a) equity securities transactions effected on a		
national securities exchange		8107
(b) equity securities transactions effected other than on a		
national securities exchange		8108
(c) commodity, bond, option and other transactions effected on		To control
national securities exchange		8109

### **FOCUS REPORT**

## Schedule I page 3

17. Respondent is a member of the Securities Investor Protection Corporation			
(enter applicable code 1=Yes 2=No)		1	8111
18. Number of branch offices operated by respondent	. [_		3 8112
19. (a) Respondent directly or indirectly controls, is controlled by, or is under			
common control with, a U.S. bank (enter applicable code 1=Yes 2=No)	[	2	8130
(b) Name of parent or affiliate			
(c) Type of institution			
20. Respondent is an affiliate or subsidary of a foreign broker-dealer or bank			
(enter applicable code 1=Yes 2=No)		2	8113
21. (a) Respondent is a subsidary of a registered broker-dealer			
(enter applicable code 1=Yes 2=No)		2	8114
(b) Name of parent8116			
22. Respondent is a subsidiary of a parent which is not a registered broker or dealer			
(enter applicable code 1=Yes 2=No)		1	8115
23. Respondent sends quarterly statements to customers pursuant to			
10b-10(b) in lieu of daily or immediate confirmations:			
(enter applicable code 1=Yes 2=No)*		2	8117
24. Aggregate Dollar Amount of Non-Exempted OTC Sales of Exchange-Listed			
Securities Done by Respondent During the Reporting Period\$		596,	280 8118
*Required in any Schedule I filed for the calendar year 1978 and succeeding years			
FINRA Miscellaneous Information			
Annual Municipal Income \$		61,	041 8151



#### Independent Accountants' Report on Applying Agreed-Upon Procedures

Board of Directors of Allen & Company of Florida, Inc. Lakeland, Florida

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934 and with SIPC Series 600 Rules, we have performed the procedures enumerated below with respect to the accompanying Schedule of General Assessment Reconciliation (Form SIPC-7) to the Securities Investor Protection Corporation (SIPC) for the year ended December 31, 2016, which were agreed to by Allen & Company of Florida, Inc. ("the Company"), the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and SIPC, solely to assist the Company and the other specified parties in evaluating the Company's compliance with the applicable instructions of the Form SIPC-7. The Company's management is responsible for the Company's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Public Company Accounting Oversight Board (United States). 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:

- Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement records entries noting no differences;
- Compared the amounts reported in the annual audited financial statements with the amounts reported in Form SIPC-7 for the year ended December 31, 2016, noting a difference of \$68,938. Total revenue per the financial statements is \$16,516,656, and total revenue per the Form SIPC-7 is \$16,447,718;
- 3. Compared any adjustments reported in Form SIPC-7, with supporting schedules and working papers supporting adjustments noting no differences;
- 4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the schedules and working papers supporting the adjustments nothing no differences; and
- 5. Compared the amount of any overpayment applied to the current assessment with the Form SIPC-7 on which it was computed noting there was no overpayment applied to the current assessment.

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.

Crowe Horwath LLP

From Hounth 11P

Lakeland, Florida February 21, 2017

# (33-REV 7/10)

# SECURITIES INVESTOR PROTECTION CORPORATION P.O. Box 92185 Washington, D.C. 20090-2185 202-371-8300

### **General Assessment Reconciliation**

(33-REV 7/10)

For the fiscal year ended 12/31/2016 (Read carefully the instructions in your Working Copy before completing this Form)

#### TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

1. N purp	ame of Member, address, Designated Examining Authoroses of the audit requirement of SEC Rule 17a-5:	rity, 1934 Act registration	n no. and month in whic	n fiscal year ends for
	17*17******2121************************		Note: If any of the info mailing label requires any corrections to form indicate on the form fi	correction, please e-mail m@sipc.org and so
	1401 S FLORIDA AVE LAKELAND FL 33803-2291		Name and telephone r contact respecting this	
	<u></u>		J	
2. A	General Assessment (item 2e from page 2)		\$	4,221
В	Less payment made with SIPC-6 filed (exclude interes	t)	(	2,343
_	Date Paid Less prior overpayment applied		( .	1
	Assessment balance due or (overpayment)		(	1.878
	Interest computed on late payment (see instruction E	F) for days at 20%	per annum	110.0
	Total assessment balance and interest due (or overp		\$	
	PAYMENT: √ the box Check mailed to P.O. Box ☑ Funds Wired ☐ Total (must be same as Fabove)	\$ 1,878	3	
Н	Overpayment carried forward	\$(	)	
3. St	bsidiaries (S) and predecessors (P) included in this fo	rm (give name and 1934	Act registration number	):
pers that	SIPC member submitting this form and the on by whom it is executed represent thereby all information contained herein is true, correct complete.	Allens	of Corporation Partnership of other	Florida, Inc.
Date	d the 18th day of February, 20 17.	Finan	CE Administ	rator
This for a	form and the assessment payment is due 60 days a period of not less than 6 years, the latest 2 years i	fter the end of the fisca n an easily accessible	al year. Retain the Wor place.	king Copy of this form
ER	Dates:	ewed		,
SIPC REVIEWER		umentation		Forward Copy
	OutputationsDuct	JJ		
<b>8</b>	Exceptions:			

## DETERMINATION OF "SIPC NET OPERATING REVENUES" AND GENERAL ASSESSMENT

Amounts for the fiscal period beginning 1/1/2016 and ending 12/31/2016

Item No. 2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)	## Eliminate cents  ## 16 447 718
<ul><li>2b. Additions:</li><li>(1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above.</li></ul>	
(2) Net loss from principal transactions in securities in trading accounts.	
(3) Net loss from principal transactions in commodities in trading accounts.	
(4) Interest and dividend expense deducted in determining item 2a.	
(5) Net loss from management of or participation in the underwriting or distribution of securities.	,
(6) Expenses other than advertising, printing, registration fees and legal fees deducted in determining net profit from management of or participation in underwriting or distribution of securities.	1
(7) Net loss from securities in investment accounts.	14,280
Total additions	14.280
Deductions:     (1) Revenues from the distribution of shares of a registered open end investment company or unit investment trust, from the sale of variable annuities, from the business of insurance, from investment advisory services rendered to registered investment companies or insurance company separate accounts, and from transactions in security futures products.	14,549,757
(2) Revenues from commodity transactions.	
(3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.	202,982
(4) Reimbursements for postage in connection with proxy solicitation.	
(5) Net gain from securities in investment accounts.	
(6) 100% of commissions and markups earned from transactions in (i) certificates of deposit and (ii) Treasury bills, bankers acceptances or commercial paper that mature nine months or less from issuance date.	5,149
(7) Direct expenses of printing advertising and legal fees incurred in connection with other revenue related to the securities business (revenue defined by Section 16(9)(L) of the Act).	
(8) Other revenue not related either directly or indirectly to the securities business. (See Instruction C):	
(Deductions in excess of \$100,000 require documentation)	
(9) (i) Total interest and dividend expense (FOCUS Line 22/PART IIA Line 13, Code 4075 plus line 2b(4) above) but not in excess of total interest and dividend income.  \$ 15,856	
(ii) 40% of margin interest earned on customers securities accounts (40% of FOCUS line 5, Code 3960).	
Enter the greater of line (i) or (ii)	15,854
Total deductions	14,773,744
2d. SIPC Net Operating Revenues	s <u>1,688,254</u>
2e. General Assessment @ .0025	\$
	(to page 1, line 2.A.)





Board of Directors Allen & Company of Florida, Inc. Lakeland, Florida

In planning and performing our audit of the financial statements of Allen & Company of Florida, Inc. ("Company") as of and for the year ended December 31, 2016, in accordance with the standards established by the Public Company Accounting Oversight Board, we considered the Company's internal control over financial reporting ("internal control") as a basis for designing our auditing procedures 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.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses. However, as discussed below, we identified certain matters in internal control that we are required to or wish to communicate to you. Matters communicated in this letter are classified as follows.

- Deficiency A control deficiency 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 misstatements on a timely basis.
- Significant Deficiency A deficiency, or combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit attention by those responsible for oversight of the Company's financial reporting.
- Material Weakness A deficiency, or combination of deficiencies, in internal control over financial reporting such that there is a reasonable possibility that a material misstatement of the Company's annual or interim financial statements will not be prevented or detected on a timely basis.

Unrestricted Great F	Plains Server Local Admin Access	Material Weakness	
Control Deficiency:	For a period of time during the year, all network users had the ability to perform administrator activities to the Great Plains server, which includes administrator rights to the Great Plains database (SQL). Additionally, Michael Walker (CFO) and Sarah Hodges (Finance Administration Associate) are inheriting admin rights to the server from their Domain Admin access, reflecting a segregation of duties concern.		
Recommendation:	This level of access should be restricted to the absolute minimum number of appropriate individuals possible.		
The access was an inadvertent setting that occurred during our transition to outsource our IT functions. It was immediately rectified upon discovery. Logs were also verified to ensure that no individuals had accessed the systems during that brief period of time.			

Great Plains and Ne	twork Change Management Process	Significant Deficiency
We were unable to obtain a complete population of changes applied to the Great Plains application or underlying infrastructure during the audit period. application does not have the ability to produce system generated logs of changes. Management recently implemented TrackIT as their ticketing system to track all changes applied in their IT environment. However, this procedure track all changes through TrackIT did not reach maturity before the start of the audit period, and therefore, some changes applied were tracked outside of TrackIT.		re during the audit period. The vstem generated logs of ckIT as their ticketing system at. However, this procedure to atturity before the start of the
Recommendation:  All changes and approvals should be tracked and documented through forms change management tickets.		documented through formal
Management Response:	As stated, a new tracking system, TrackIT, has be changes, including approvals. All previous chang and approved, just not within the TrackIt system.	

Tracking and Accrual of Trails		Significant Deficiency	
Control Deficiency:	There is currently no tracking performed by the Company to ensure that the fincome received is complete and accurate. Trails are earned over time and a subsequently received by check to the Company's location and are logged a entered into the system. The Company does not verify that the amounts received are appropriate given the asset base on which the trails are due. Amounts subsequently received are backdated as the prior month's accrual (i.e., recorded as revenue and a receivable).		
Recommendation:	We recommend that the Company develop a trac bases are estimated and an overall estimation of calculated. This would then be compared to actua in excess of a determined threshold will be invest	trails to be received is Il trails received and variances	
Management Response:	Management has a thorough review process that budget comparisons, as well as, historical compa Our advisors also have the ability to access their web-based program, Xtiva. It can be reviewed da reported for investigation. Management will take advisement and engage our clearing company for of trailing commissions.	risons to detect variances.  commission detail through a lily and discrepancies are the recommendation under	

This report is intended solely for the information and use of the Audit Committee, Board of Directors, management and others within the organization and regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties.

The Company's written response to the significant deficiencies and material weakness identified in our audit was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

Crowe Horwath LLP

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Lakeland, Florida February 21, 2017