					Zd			
			1971 1983983 17 63 844 			a Aliteration		
		170	16944			. '		
			UNITEDSTATE	S		OM	B APPROVAL	
·.	ci		NDEXCHANGE shington, D.C. 2			OMB Num Expires:	iber: 3235 May 31,	-0123
<u>,</u> 3	stall Der	noesina		and the second	·	Estimated	l average burde	en -
	Mail T K Sei	CTIANNUAL	. AUDITED	REPORT	. 1	hours pe	response	12.00
		EC STATE	DRM X-17/	4-5			SEC FILE NU	JMBER
	MAR	21201	PART III				8-42393	
•	Washi	ngton DC	FACING PAGE	7	,		12000	·
2	Information Requ	• .			to Secti	ion 17 of	the	
	•	Exchange Ac					- 	
FPAPTEA	R THE PERIOD BEGIN	UNING 01/01	/2016	AND EN		2/31/20)16	
	A THE FERIOD BEGIN		MM/DD/YY	AND EN			1/DD/YY	<u></u>
		A. REGISTR	ANT IDENTI	FICATION				
NAME OF B	ROKER-DEALER: A	LLEN C. EWINC	G & CO.			OF	FICIAL USE (ONLY
DDRESS O	F PRINCIPAL PLACE	OF BUSINESS.	(Do not use P.O.	Box No)	· •	-	FIRM I.D. N	
10010000	I RECEIVED		(Do not use 1.0	DUA NU.)		L <u>.</u>		
7007 01		AD EACT						
7807 BA	YMEADOWS RO	AD, EAST	(NI			·	· · · · · · · · · · · · · · · · · · ·	
7807 BA		····· ;	(No. and Street).			32256		
7807 BA	JACKSONVI	·····	FL			32256		
	JACKSONVI (City)	LLE	FL (State)		TITIC D	(Zip Code)		
NAME AND	JACKSONVI	LLE	FL (State)	N REGARD TO	THIS R	(Zip Code)		
NAME AND	JACKSONVI (City) Telephone numbe	LLE	FL (State)	N REGARD TO	THIS R	(Zip Code) ÉPORT	le – Telephone I	Number)
NAME AND	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722	LLE	FL (State) TO CONTACT I		THIS R	(Zip Code) ÉPORT		Number)
VAME AND FAMARAH D. JOP	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722	LLE R OF PERSON 7	FL (State) FO CONTACT I ANT IDENTI	FICATION		(Zip Code) ÉPORT		Number)
NAME AND TAMARAH D. JOI NDEPENDE	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN	LLE IR OF PERSON B. ACCOUNT	FL (State) FO CONTACT I ANT IDENTI	FICATION		(Zip Code) ÉPORT		Number)
NAME AND TAMARAH D. JOI NDEPENDE	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722	LLE IR OF PERSON B. ACCOUNT ITANT whose op WARD OPP	FL (State) FO CONTACT I ANT IDENTI inion is containe ERMAN, CI	FICATION and in this Report	F	(Zip Code) ÉPORT		Number)
NAME AND TAMARAH D. JOI NDEPENDE SHEDJA	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED	LLE R OF PERSON B. ACCOUNT TANT whose op WARD OPP (Name -	FL (State) FO CONTACT I ANT IDENTI inion is containe ERMAN, CI	FICATION and in this Report	e)	(Zip Code) ÉPORT	de – Telephone i	· · · · · · · · · · · · · · · · · · ·
VAME AND FAMARAH D. JOP NDEPENDE SHEDJA 1901	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR	LLE R OF PERSON B. ACCOUNT TANT whose op WARD OPP (Name – EET L	FL (State) FO CONTACT I ANT IDENTI inion is containe ERMAN, CI (Findividual, state la AFAYETTE	FICATION and in this Report	⊧ ine) IN	(Zip Code) ÉPORT	de – Telephone 1 4790	5 <u></u>
NAME AND TAMARAH D. JOI NDEPENDE SHEDJA	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR	LLE R OF PERSON B. ACCOUNT TANT whose op WARD OPP (Name -	FL (State) FO CONTACT I ANT IDENTI inion is containe ERMAN, CI (Findividual, state la AFAYETTE	FICATION and in this Report	e)	(Zip Code) ÉPORT	de – Telephone 1 4790 (Zip Cod	5 <u>2</u>
VAME AND FAMARAH D. JOH NDEPENDE SHEDJA 1901 (Address	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR s)	LLE R OF PERSON B. ACCOUNT TANT whose op WARD OPP (Name – EET L	FL (State) FO CONTACT I ANT IDENTI inion is containe ERMAN, CI (Findividual, state la AFAYETTE	FICATION and in this Report	⊧ ine) IN	(Zip Code) ÉPORT	de – Telephone 1 4790	191 HAR 2
NAME AND TAMARAH D. JOH NDEPENDE SHEDJA 1901 (Address	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR s)	LLE R OF PERSON B. ACCOUNT ITANT whose op WARD OPP (Name – EET L (Ci	FL (State) FO CONTACT I ANT IDENTI inion is containe ERMAN, CI (Findividual, state la AFAYETTE	FICATION and in this Report	⊧ ine) IN	(Zip Code) ÉPORT	de – Telephone 1 4790 (Zip Cod	20 HAR 22
NAME AND TAMARAH D. JOH NDEPENDE SHEDJA 1901 (Address	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR s) E:	LLE R OF PERSON B. ACCOUNT ITANT whose op WARD OPP (Name – EET L (Ci	FL (State) FO CONTACT I ANT IDENTI inion is containe ERMAN, CI (Findividual, state la AFAYETTE	FICATION and in this Report	⊧ ine) IN	(Zip Code) ÉPORT	de – Telephone 1 4790 (Zip Cod	20 HAR 22
NAME AND TAMARAH D. JOH NDEPENDE SHEDJA 1901 (Address	JACKSONVI (City) TELEPHONE NUMBE NES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR (s) E: Certified Public Accou	LLE R OF PERSON B. ACCOUNT TANT whose op WARD OPP (Name - EET L (Cl untant	FL (State) TO CONTACT I ANT IDENTI inion is containe PERMAN, CI if individual, state la AFAYETTE ity)	FICATION	⊧ ine) IN	(Zip Code) ÉPORT	de – Telephone 1 4790 (Zip Cod	191 HAR 2
NAME AND TAMARAH D. JOH NDEPENDE SHEDJA 1901 (Address	JACKSONVI (City) TELEPHONE NUMBENES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR s) E: Certified Public Accou Public Accountant	LLE R OF PERSON B. ACCOUNT ITANT whose op WARD OPP (Name - EET L (Cl antant nt in United State	FL (State) TO CONTACT I ANT IDENTI inion is containe ERMAN, CI if individual, state la AFAYETTE ity)	FICATION and in this Report A st, first, middle nam	⊧ ine) IN	(Zip Code) ÉPORT	de – Telephone 1 4790 (Zip Cod	201 HAR 22 PM 2:
NAME AND TAMARAH D. JOP NDEPENDE SHEDJA 1901	JACKSONVI (City) TELEPHONE NUMBENES - 954-328-6722 I ENT PUBLIC ACCOUN MA, INC dba ED I KOSSUTH STR s) E: Certified Public Accou Public Accountant	LLE R OF PERSON B. ACCOUNT ITANT whose op WARD OPP (Name - EET L (Cl antant nt in United State	FL (State) TO CONTACT I ANT IDENTI inion is containe PERMAN, CI if individual, state la AFAYETTE ity)	FICATION and in this Report A st, first, middle nam	⊧ ine) IN	(Zip Code) ÉPORT	de – Telephone 1 4790 (Zip Cod	201 HAR 22 PM

SEC 1410 (06-02)

v

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.

ANB

 $\int_{\mathbb{R}}$

OATH OR AFFIRMATION

I, BENJAMIN C. BISHOP, JR ______, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of ALLEN C. EWING & CO. _______, as of DECEMBER 31 ______, 20 16 _____, are true and correct. I further swear (or affirm) that

neither the company nor any partner, proprietor, principal officer or director has any proprietary interest in any account classified solely as that of a customer, except as follows:

SHAARON M. ANDERSON MA CININ MY COMMISSION # FF 171995 Signature **EXPIRES: November** 2018 dad Thru Notary Public U CHAIRMAN OF THE BOARD Title Notary Public

This report ** contains (check all applicable boxes):

- (a) Facing Page.
- (b) Statement of Financial Condition.
- (c) Statement of Income (Loss).
- (d) Statement of Changes in Financial Condition.
- (e) Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
- (f) Statement of Changes in Liabilities Subordinated to Claims of Creditors.
- (g) Computation of Net Capital.
- (h) Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3.
- (i) Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
- (j) A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
- (k) A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation.
- (I) An Oath or Affirmation.
- (m) A copy of the SIPC Supplemental Report.
- (n) A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

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

4

REPORT ON AUDIT OF FINANCIAL STATEMENTS

DECEMBER 31, 2016



EDWARD OPPERMAN, CPA CERTIFIED PUBLIC ACCOUNTANT "NOT JUST YOUR ACCOUNTANT, YOUR PARTNERS IN SUCCESS"

ł

TABLE OF CONTENTS

Report of Independent Registered Public Accounting Firm

Financial Statements:

Statement of Financial Condition

Statement of Income

Statement of Changes in Stockholder's Equity

Statement of Cash Flows

Notes to the Financial Statements

Computation of Net Capital Under SEC Rule 15c3-1

Reconciliation Between Audited and Unaudited Net Capital Computation

Independent Auditors' Report on Internal Controls Under SEC Rule 17A-5(g)(1)

Report of Independent Registered Public Accounting Firm on Applying Agreed-Upon Procedures

Related to an Entity's SIPC Assessment Reconciliation

Report of Independent Registered Public Accounting Firm Broker-Dealer's Exemption Report

.

CERTIFIED PUBLIC ACCOUNTANT & BUSINESS CONSULTANT 1901 Kossuth Street | Lafayette, IN 47905 | 765-588-4335



"NOT JUST YOUR ACCOUNTANT, YOUR PARTNERS IN SUCCESS"

eedwardoppermancpa.com | www.edwardoppermancpa.com

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

The Board of Directors ALLEN C. EWING & CO. Jacksonville, Florida

We have audited the accompanying statement of financial condition of ALLEN C. EWING & CO., (a Florida corporation), as of December 31, 2016, and the related statements of income, changes in stockholder's equity, changes in liabilities subordinated to claims of general creditors, and cash flows for the year then ended. These financial statements are the responsibility of ALLEN C. EWING & CO.'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 C. EWING & CO. as of December 31, 2016, and the results of its operations and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

The Schedules of Computation of Net Capital Under SEC Rule 15c3-1 and the Reconciliation between Audited and Unaudited Net Capital Computation have been subjected to audit procedures performed in conjunction with the audit of ALLEN C. EWING & CO.'s financial statements. The supplemental information is the responsibility of ALLEN C. EWING & CO.'s management. Our audit procedures included determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the supplemental information. In forming our opinion on the supplemental information, we evaluated whether the supplemental information, including its form and content, is presented in conformity with 17 C.F.R. §240.17a-5. In our opinion, the Schedules of Computation of Net Capital Under SEC Rule 15c3-1 and the Reconciliation between Audited and Unaudited Net Capital Computation are fairly stated, in all material respects, in relation to the financial statements as a whole.

SHEDJAMA, INC. dba Edward Opperman, CPA Lafayette, Indiana February 25, 2017

· 1

a.

STATEMENT OF FINANCIAL CONDITION AS OF DECEMBER 31, 2016

ASSETS

ASSETS	
Cash	\$ 9,016
Investments	95,713
Accounts receivable	-
Due from affiliates	15,960
Prepaid expenses	-
Property and Equipment, net of accumulated depreciation	 3,406
TOTAL ASSETS	124,095

LIABILITIES AND STOCKHOLDER'S EQUITY

LIABILITIES	
Accounts payable and accrued expenses	19,649
Due to affiliates	-
Deferred rent	 -
TOTAL LIABILITIES	19,649
STOCKHOLDER'S EQUITY	
Common stock, \$0.10 par value; 15,000 share authorized; 5,100 shares issued and outstanding	510
Addional paid-in capital	1,486,557
Retained earnings	 (1,382,621)
TOTAL STOCKHOLDER'S EQUITY	 104,446
TOTAL LIABILITIES AND STOCKHOLDER'S EQUITY	\$ 124,095

STATEMENT OF INCOME

REVENUE

· ·

*

Commissions	134,771
Investment banking fees	-
Fund management and administration fees	-
Management counsulting fees	25,137
Private placement fees	95,000
TOTAL REVENUE	254,908
EXPENSES	
General and administrative expenses	251,868
Salary and commission expense	262,611
TOTAL EXPENSES	514,479
Operating loss	(259,571)
Other income, net	4,869
NET INCOME	\$ (254,702)

• г

٨

STATEMENT OF CHANGES IN STOCKHOLDER'S EQUITY

FOR THE YEAR ENDED DECEMBER 31, 2016

	 mmon tock	Additional Paid-in Capital	 Retained Earnings	Sto	Total ockholder's Equity
BALANCE AT THE BEGINNING OF THE YEAR	\$ 510	\$ 1,246,191	\$ (1,127,919)	\$	118 ,782
Net Income	-	-	(254,702)		(254,702)
Stockholder's contributions	-	240,366	-		240,366
Stockholder's distributions	-	-	 -		-
BALANCE AT THE END OF THE YEAR	\$ 510	\$ 1,486,557	\$ (1,382,621)	\$	104,446

.

. '

,

STATEMENT OF CASH FLOWS

FOR THE	YËAR	ENDED	DECEMBER	31,	2016
---------	------	-------	----------	-----	------

CASH FLOWS FROM OPERATING ACTIVITIES Net Income	\$	(254,702)
Adjustments to reconcile net income to net cash provided by		
Operating activities:		
Depreciaiton	\$	3,401
(Increase) decrease in operating assets:		
Accounts receivable		6,750
Due from affiliates		33,540
Prepaid expenses		12,329
Increase (decrease) in operating liabilities:		
Acconts payable and accrued expenses		19,615
Due to affiliates		(33,817)
Deferred Rent		(35,247)
Net Cash Provided by Operating Activities		(248,131)
CASH FLOWS FROM INVESTING ACTIVITIES		
Stockholder contributions		240,366
Purchase of fixed assets		(2,926)
Proceeds from investments - net		1,662
Net Cash Used in Investing Activities		239,102
NET (DECREASE) IN CASH		(9,029)
CASH AT BEGINNING OF YEAR		18,045
CASH AT END OF YEAR	\$	9,016

NOTE 1: ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A summary of the Firm's significant accounting policies consistently applied in the preparation of the accompanying financial statements are as follows:

a. <u>Nature of Operations</u>— ALLEN C. EWING & CO. a Florida C corporation (the Firm), is a registered broker/dealer with the Securities and Exchange Commission (SEAC)A and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). The Firm provides sales of life insurance and annuities, fund management and investment banking services, which includes advisory services to clients on corporate finance maters, mergers, acquisitions, private placement, and valuations of securities for institutions located primarily in the Southeast United States.

The sole stockholder of the Firm is Ewing Capital Partners, LLC (ECP), a Florida limited liability company.

- b. <u>Cash Equivalents</u>—For purposes of the statements of cash flows, the Firm considers all highly liquid debt instruments with maturities of three months or less when purchased to be cash equivalents. There were no cash equivalents at December 31, 2016.
- c. <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, the disclosure of contingent assets and liabilities at the date of the financial statements, and the reported amounts of revenue and expenses during the reporting period. Actual results could differ from those estimates.
- d. <u>Concentrations of Credit Risk</u>—The Firm places its cash in accounts with a local financial institution. At times, balances in these accounts may be exceed FDIC insured limits.
- e. <u>Accounts Receivable</u>— Accounts Receivable consists of primarily of commission receivables recorded at the original invoice amount net of allowances for contractual adjustments and estimated uncollectible accounts, if any, and do not bear interest. Normally accounts receivable are due within 30 days after the date of the invoice. Receivables more than 90 days old are considered past due. The Firm determines the allowance based on historical write-off experience. Past due balances are reviewed individually for collectability. Account balances are charged off against the allowance after all means of collection have been exhausted and the potential recovery is considered remote. At December 31, 2016, the Firm determined that there was no need for an allowance for uncollectible accounts receivable.
- f. <u>Advertising</u>—The Firm's advertising costs are expensed as incurred. There were no advertising costs incurred during the year.
- g. <u>Revenue Recognition</u>— Fee revenue includes recurring professional services that are paid for the duration of the engagement, and success fees earned on completed mergers and acquisition transactions. Professional service revenues are recorded at the time services are performed, while success fees are recorded when the transaction is completed and the income is reasonably determinable.
- h. <u>Commissions</u>—Commissions and related clearing expenses are recorded on a trade-date basis as the securities transaction occur.
- i. <u>Investment Advisory Income</u>—Investment advisory fees are received quarterly; however, are recognized as earned on a pro rata basis over the term of the contract.

Page | 10 - ALLEN C. EWING & CO.

NOTE 1: ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (cont)

j. <u>Property and Equipment</u>—Property and equipment are recorded at costs. Depreciation is provided on the straight-line and accelerated methods. Maintenance and minor repairs are charged to operations when incurred. When assets are retired or sold; the related costs and accumulated depreciation are removed from the accounts and the resulting gain or loss is reflected in current operations. Estimated useful lives for deprecation are between 3 and 10 years.

In accordance with authoritative guidance, the Firm reviews the carrying value of long-lived assets for impairment whenever events or changes in circumstances indicate that the carrying amount of the asset may not be recoverable. Recoverability of ling-live assets is measured by comparing the carrying amount of the asset or asset group to the undiscounted cash flows that the asset or asset group is expected to generate. If the undiscounted cash flows of such assets are less than the carrying amount, the impairment to be recognized is measured by the amount by which the carrying amount, if any, exceeds its fair value. No impairments were deemed to exist at December 31, 2015.

- Investments—Investments are recorded at fair value in accordance with FASB ASC 820, Fair Value Measurement.
- <u>Deferred Rent</u>—The Firm amortizes lease payments on the straight-line basis over the term of the lease. The difference between the actual minimum monthly lease payments and the amount expensed is recorded as deferred rent.
- m. <u>Income Taxes</u>—The Firm records a deferred tax liability or asset based on the difference between financial statement and tax basis of assets and liabilities as measured by the anticipated tax rates which will be in effect when these differences reverse. The measurement of deferred tax assets is reduced, if necessary, by the amount of any tax benefits that, based on available evidence, are not expected to be realized.

The Firm evaluates its tax position for any uncertainties based on the technical merits of the position taken in accordance with authontative guidance. The Firm recognizes the tax benefit from an uncertain tax position only if it is more likely than not that the tax position will be upheld on examination by taxing authorities. The Firm has analyzed tax positions taken, or expected to be taken, that would require recognition of a liability or disclosure in the financial statements.

n. <u>Revenue Recognition</u>—Private placement fees are earned by assisting customers in raising customers in raising capital from private investors. Private placement revenues are recognized when the terms of the engagement have been fulfilled.

Commissions are earned on sales of mutual fund shares, life insurance policies and variable annuities and are received directly from the related fund or issuer. All commission revenue is recognized when earned.

Investment banking fees are earned by providing advisory services to clients on corporate finance matters, including mergers and acquisitions and the issuance of public stock. Investment banking revenues are recognized when earned.

Fund management fees are earned by providing investment fund man agreement services to clients of the investment management fund. Fund management fees are recognized when earned.

Management consulting services revenue are recognized as the related services are rendered.

.

NOTE 2: COMMISSION RECEIVABLES AND PAYABLES FROM AND TO BROKERS

Receivables from brokers represent commissions due and accrued to the Firm from their correspondents. The payable to brokers are commissions due to the brokers. At December 31, 2016, there were commissions receivable of 0 and accrued commissions payable of 0 at December 31, 2016.

NOTE 3: EXEMPTION UNDER RULE 15c3-3

The Firm claims an exemption under Rule 15c3-3 in accordance with the provision of paragraph (k) (2)(i) "Special Account for the Exclusive Benefit of customers maintained". During the year ended December 31, 2016 there were no amounts to be reported pursuant to the possession or control requirements under Rule 15c3-3, and the Firm is in compliance with their stated exemptive provisions, and thus is exempt from the provisions of Rule 15c3-3.

NOTE 4: INCOME TAX EXPENSE

The Firm has elected to be treated as an C Corporation for tax purposes.

Accounting principles generally accepted in the United State of America require the Firm to examine its tax positions for uncertain positions. Management is not aware of any tax positions that are more likely than not to change in the next twelve months or that would not sustain an examination by applicable taxing authorities.

The Firm's policy is to recognize penalties and interest as incurred in its Statement of Income, there were none for the year ended December 31, 2016.

The firm's federal and state income tax returns for 2013 through 2016 are subject to examination by the applicable tax authorities, generally for three years after the later of the original or extended due date.

NOTE 5: ACCOUNTING FOR UNCERTAINTY IN INCOME TAXES

In June 2006, the Financial Accounting Standards Board (FASB) issued FASB Interpretation Number 48 (FIN 48), Accounting for Uncertainty in Income Taxes - an Interpretation of FASB Statement No. 109 (SFAS-109). The interpretation contains a two-step approach to recognizing and measuring uncertain tax positions accounted for in accordance with SFAS 109. The Firm has elected to defer the adoption of FIN 48 as allowed in FASB Staff Position (FSP-48-3) issued December 30, 2008. The adoption of this standard is not currently anticipated to have a material impact on the Firm's financial position, results of operations, or cash flows; however, the effect on future financial statements of this pronouncement cannot be determined at this time. Management will continue to evaluate any uncertain tax positions, if any, during the deferral period.

NOTE 6: NET CAPITAL REQUIREMENTS

The Firm is required to maintain a minimum net capital under Rule 15c3-1 of the Securities and Exchange Commission. Net capital required under the rule is the greater of \$5,000 or 6 2/3 percent of the aggregate indebtedness of the Firm. At December 31, 2016, net capital as defined by the rules, equaled \$95,121. The ratio of aggregate indebtedness to net capital was 24.83. Net capital in excess of the minimum required was \$74,119.

NOTE 7: RECONCILIATION PURSUANT TO RULE 17A-5(D)(4)

There were no material reconciling items between the December 31, 2016 unaudited FOCUS report and this audit, in the computation of Net Capital under Rule 15c3-1.

NOTE 8: POSSESSION OR CONTROL REQUIREMENT UNDER RULE 15c3-3

Information relating to possession or control requirements is not applicable to the Firm as the Firm qualified for exemption under Rule 15c3-3 (k) (2) (ii).

NOTE 9: FILING REQUIREMENTS

There were no liabilities subordinated to claims of creditors during the year ended December 31, 2016. Accordingly, no Statement of Changes in Liabilities Subordinated to Claims of Creditors has been included in these financial statements as required by rule 17a-5 of the Securities and Exchange Commission.

NOTE 10: SUBSEQUENT EVENTS

Management has evaluated subsequent events through the date which the report of the independent registered accounting firm was available to be issued.

NOTE 11: INCOME TAXES

The components of the Firm's deferred tax assets consisted of the following at December 31, 2016:

Net Operating Loss:	\$ 422,098
Valuation allowance	(422,098)
Deferred tax assets, net	<u>\$0</u>

Based on the available objective evidence, the Firm believe it is more likely than not that the deferred tax assets will not be realizable. Accordingly, the Firm provided for a full valuation allowance agains its deferred tax assets at December 31, 2016. The firm has tot net operating loss carryforwards available to offset future taxable income of approximately \$1,127,919. To the extent not used, these loss carryforwards will begin to expire in 2023.

The income tax provision differs from amounts computed by applying the federal statutory income tax rate to pretax loss as follows for the year ended December 31, 2016:

Tax benefit using federal statutory rate	\$ 35,359
State income tax benefit, net of federal tax effect	3,775
Change in valuation allowance	(39,134)
Income tax expense	<u>\$0</u>

ALLEN C. EWING & CO. NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR DECEMBER 31, 2016

NOTE 12: FAIR VALUE HIERARCHY

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

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

Level 1. Quotes prices (unadjusted) in active markets for identical assets or liabilities that the Firm can access at the measurement date.

Leve 2. Inputs other than quoted prices included within level 1 are observable for asset or liability either directly or indirectly.

Level 3. Unobservable inputs for the assets or liability.

The availability of observable inputs can vary from security to security and is affected by a wide variety of factors, including, for example, the type of security, the liquidity of markets, and other characteristics to the security, To the extent that valuation is based on models or imputes that are less observable or unobservable in the market, the determination of fair value requires more judgment, Accordingly, the degree of judgment exercised in determining fair value is greater for instruments categorized in level 3.

The inputs used to measure fair value may fall into different levels of the fair value hierarchy. In such cases, for disclosure purposes, the level in the fair value hierarchy within which the fair value measurement falls in its entirety is determined based on the lowest input that is significant to the fair value measurement in its entirety.

Fair value is the market-based measure considered from the perspective of a market participant rather than an entity-specific measure. Therefore, even when market assumptions are not readily available, the Firm's own assumption are set to reflect those that the Firm believes market participants would us in pricing the asset or liability at the measurement date.

A description of the evaluation techniques applied to the firm's major categories of assets and liabilities measured at fair value on recurring basis follows.

Corporate Bonds: The fair value of corporate bonds is determined using recently executed transactions, market price quotations (when observable), bond spreads or credit default swap spreads obtained from independent external parties, such as vendors and brokers, adjusted for any basis difference between cash and derivative instruments. The spread data used are for the same maturity as the bond. If the spread data do not reference the issuer, then data that reference a comparable issuer are used. When position-specific external price data are not observable, fair value is determined based on either benchmarking to similar instruments or cash flow models with yield curves, bond, or single-name credit default swap spreads and recovery rates as significant inputs. Corporate bonds are generally categorized in level 2 of the fair value hierarchy; in instances when prices, spreads, or any of the other aforementioned key inputs are unobservable, they are categorized in level 3 of the fair value hierarchy.

(continued)

,

NOTE 12: FAIR VALUE HIERARCHY (continued)

The following table presents the Firm's fair vale hierarchy for those assets and liabilities measured at fair value on a recurring basis as of December 31, 2016.

ASSET	Level 1	Level 2	<u>Levei 3</u>	<u>Total</u>
Corporate Bonds	-0-	\$95,713	-0-	\$95,7 13

NOTE 13: RELATED PARTY TRANSACTIONS

The Firm, is a wholly-owned subsidiary of Ewing Capital Partners (ECP). The Firm owed Ewing Loan Advisors, Inc. (ELA), wholly owned subsidiary of Ewing Capital Partners (ECP), \$31,713 at December 31, 2016. These unsecured balances are due on demand and do not accrue interest.

The Firm manages an investment fund, Ewing Emerging Financial Institution Fund I, LP (Fund I) that invests in the shares of DeNova Banks in Florida and the Southeastern United States. Certain officers of the Firm are officers of the General Partner of Fund I, and are also investors in the fund. Pursuant to this management agreement with fund I, the Firm received \$0 in advisory fees for the year ended December 31, 2015.

The Firm manages a second investment fund, Ewing Emerging Financial Institution Fund III, LP (Fund III) with similar investment criterial and objectives as Fund I. certain officers of the Firm are officers of the General Partner of fund III. Pursuant to its management agreement with Fund III, the Firm received \$19,407 in advisory fees for the year ended December 31, 2016.

The General Partner of both Fund I and Fund III is Ewing Emerging Financial Institution Fund GP, LLC. The sole member of the General Partner is the Firm.

During 2016, the firm charged ERE and ELA \$42,000 in consulting fees for management services rendered, and \$21,400 in rent. During 2016 the Firm generated revenues from related parties comprising 25 of total revenues.

During 2016, the Firm paid payroll and benefits amounts for employees who perform services for the Firm and ELA. ELA paid the Firm for its proportionate share of these expenses, which totaled \$145,450 during the year.

During 2016, the Firm charged Income Enhancement Strategies, LLC (IES), and affiliated through common ownership \$203,114 for IES's proportionate share of the rent and overhead costs of shared facilities in the charlotte office. The firm also received reimbursement form IES for shared services. During the year, the Firm received \$203,114, which offset payroll costs.

During 2016, the Firm received \$153,813 from Great Lakes & Atlantic Wealth Management (GL&A) for their proportionate share of rent.

ALLEN C. EWING & CO. NOTES TO THE FINANCIAL STATEMENTS FOR THE YEAR DECEMBER 31, 2016

.

ŝ

NOTE 13: COMMITMENTS AND BUSINESS CONCENTRATIONS

Concentrations—Financial instruments which potentially subject the Firm to a concentration of credit risk consist principally of cash and cash equivalents. Cash and cash equivalents balances are exposed to credit risk since the Firm periodically maintains balances more than federally insured limits. The Firm does not believe it is exposed to any significant credit risk on these deposits.

During the year ended December 31, 2016, the Firm generated revenues from one customer comprising 30 percent of total revenues.

Leases—The Firm leases certain equipment and facilities under non-cancelable operating lease agreements that expire at various dates through 2019. The lease expense was \$161,357 for the year ended December 31, 2016.

Future minimum lease payments under non-cancelable operating leases with initial or remaining lease terms more than on year consisted of the following at year end:

2017	\$118,914
2018	\$122,181
2019	<u>\$ 10,391</u>
Total	<u>\$251,486</u>

ALLEN C. EWING & CO. COMPUTATION OF NET CAPITAL REQUIREMENTS FOR THE YEAR ENDED DECEMBER 31, 2016 SCHEDULE I, II, III

•

,

.

SCHEDULE I: COMPUTATION OF NET CAPITAL UNER RULE 15c3-1

Total ownership equity from Statement of Financial Condition	\$ 104,446
less nonallowable assets from Statement of Financial Condition	 (9,519)
Total ownership equity qualified for Net Capital	\$ 94,927
Haircuts on securities Net Capital before haircuts on securities positions	\$ (16,002) 78,925

SCHEDULE II: COMPUTATION OF AGGREGATE INDEBTEDNESS AND EXCESS CAPITAL UNDER RULE 15c3-1

Aggregate indebtedness Net Capital required based on aggregate indebtedness (6-2/3%)	\$ 19,649 1,311
COMPUTATION OF BASIC NET CAPITAL REQUIREMENT	
Minimum dollar net capital requirement of reporting broker or dealer	5,000
Excess net capital	73,925
<u>COMPUTATION OF AGGREGATE INDEBTEDNESS</u> (a) - 10% of total aggregate indebtedness (b) - 120% of minimum net capital requirements	1,965 6,000
Net Capital less the greater of (a) or (b) Percentage of Aggregate Indebtedness to Net Capital	72,925 24.90%

SCHEDULE III: COMPUTATION FOR DETERMINATION OF RESERVE REQUIREMENTS UNDERRULE 15c3-3 AND INFORMATION RELATING TO THE POSSESSION OR CONTROL REQUIREMENTS UNDER RULE 15c3-1

ALLEN C. EWING & CO. does not carry custimer accounts as defined by the Securities Exchange Act of 1934 under Section (a)(1) of Rule 15C3-3. Therefore ALLEN C. EWING & CO. is exempt from the provisions of this rule.

FOCUS PART IIA FILING RECONCILIATION BETWEEN AUDITED AND UNAUDITED NET CAPITAL

At December 31, 2014, there were the following matereial differences between audited net capital, above, and net capital reported in the Firm's Part II (unaudited) FOCUS report.

Net Capital as reported in FOCUS Report for Qtr 4-2014	\$ 79,119	
Depreciation Adjustment	\$ (3,401)	
Miscellaneous Adjustment	3,207	
Net Capital as reported in Audited Financial Statements	\$ 78,925	•



"NOT JUST YOUR ACCOUNTANT, YOUR PARTNERS IN SUCCESS"

eGedwardoppermancpa.com | www.edwardoppermancpa.com

RECONCILIATION BETWEEN AUDITED AND UNAUDITED NET CAPITAL COMPUTATION

The Board of Directors ALLEN C. EWING & CO. Jacksonville, Florida

Reference: Reconciliation between the audited computation of net capital and the broker dealer's unaudited net capital computation as reported on the December 31, 2016 Part IIA filing.

Conclusion:

÷

There were no material differences between the audited and unaudited net capital computation.

SHEDJAMA, INC dba Edward Opperman, CPA Lafayette, Indiana February 25, 2017

CERTIFIED PUBLIC ACCOUNTANT & BUSINESS CONSULTANT 1901 Kossuth Street | Lafarette, IN 47905 | 765-588-4335



"NOT JUST YOUR ACCOUNTANT, YOUR PARTNERS IN SUCCESS"

e@edwardoppermancpa.com | www.edwardoppermancpa.com

INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL UNDER SEC RULE 17A-5(g)(1)

The Board of Directors ALLEN C. EWING & CO. Jacksonville, Florida

In planning and performing our audit of the financial statements of ALLEN C. EWING & CO. as of and for the year ended December 31, 2016, in accordance with auditing standards generally accepted in the United States of America, we considered ALLEN C. EWING & CO.'s internal control over financial reporting (internal control) as a basis for designing our audit 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 ALLEN C. EWING & CO.'s internal control. Accordingly, we do not express an opinion on the effectiveness of ALLEN C. EWING & CO. internal control. Also, as required by Rule 17a-5(g)(1) of the Securities and Exchange Commission (SEC), we have made a study of the practices and procedures followed by ALLEN C. EWING & CO., including consideration of control activities for safeguarding securities. This study included tests of such practices and procedures that we considered relevant to the objectives stated in Rule 17a-5(g) in making the periodic computations of aggregate indebtedness (or aggregate debits) and net capital under Rule 17a-3(a) (11) and for determining compliance with the provisions of Rule 15c3-3. Because ALLEN C. EWING & CO. does not carry securities and procedures followed by the Company in any of the following:

- Making quarterly securities examinations, counts, verifications, and comparisons and recordation of differences required by Rule 17a-13.
- Complying with the requirements for prompt payment for securities under Section 8 of Federal Reserve Regulation T of the Board of Governors of the Federal Reserve System.

The management of ALLEN C. EWING & CO. is responsible for establishing and maintaining internal control and the practices and procedures referred to in the preceding paragraph. In fulfilling this responsibility, estimates and judgments by management are required to assess the expected benefits and related costs of controls and of the practices and procedures referred to in the preceding paragraph and to assess whether those practices and procedures can be expected to achieve the SEC's previously mentioned objectives. Two of the objectives of internal control and the practices and procedures are to provide management with reasonable but not absolute assurance that assets for which the Company has responsibility are safeguarded against loss from unauthorized use or disposition and that transactions are executed in accordance with management's authorization and recorded properly to permit the preparation of financial statements in conformity with generally accepted accounting principles. Rule 17a-5(g) lists additional objectives of the practices and procedures listed in the preceding paragraph.

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

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected, on a timely basis.

Our consideration of internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. We did not identify any deficiencies in internal control activities for safeguarding securities that we consider to be material weaknesses, as defined previously.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that ALLEN C. EWING & CO.'s practices and procedures, as described in the second paragraph of this report, were adequate at February 13, 2017, to meet the SEC's objectives.

This report is intended solely for the information and use of the Board of Directors, management, the SEC, and other regulatory agencies that rely on Rule 17a-5(g) under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and is not intended to be and should not be used by anyone other than these specified parties.

.

.

.

SHEDJAMA, INC. dba Edward Opperman, CPA Lafayette, Indiana February 25, 2017



S CPA

"NOT JUST YOUR ACCOUNTANT, YOUR PARTNERS IN SUCCESS"

e@edwardoppermancpa.com | www.edwardoppermancpa.com

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

The Board of Directors ALLEN C. EWING & CO. Jacksonville, 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 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 C. EWING & CO. and SIPC, Securities and Exchange Commission, and Financial Industry Regulatory Authority, Inc., solely to assist you and the other specified parties in evaluating ALLEN C. EWING & CO.'s compliance with the applicable instructions of Form SIPC-7. ALLEN C. EWING & CO.'s management is responsible for ALLEN C. EWING & CO.'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 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 on the audited Form X-17A-5 (FOCUS Report) for the year ended December 31, 2016 with the amounts reported in Form SIPC-7 for the year ended December 31, 2016, noting no differences;
- Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers, noting no differences;
- 4) Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related schedules and working papers supporting the adjustments, noting no differences; and
- Compared the amount of any overpayment applied to the current assessment with the Form SIPC-7 on which it was originally computed, noting no differences.

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.

SHEDJAMA, INC dba Edward Opperman, CPA Lafayette, Indiana February 25, 2017