

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

ANNUAL AUDITED REPORT  
FORM X-17A-5  
PART III

OMB APPROVAL	
OMB Number:	3235-0123
Expires:	August 31, 2020
Estimated average burden hours per response.....	12.00

SEC FILE NUMBER
8-44344

FACING PAGE

Information Required of Brokers and Dealers Pursuant to Section 17 of the  
Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING 01/01/19 AND ENDING 12/31/19  
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER: H. Rivkin & Company, Inc

ADDRESS OF PRINCIPAL PLACE OF BUSINESS: (Do not use P.O. Box No.)  
12 West Delaware Avenue

OFFICIAL USE ONLY
FIRM I.D. NO.

(No. and Street)

Pennington

New Jersey

08534

(City)

(State)

(Zip Code)

NAME AND TELEPHONE NUMBER OF PERSON TO CONTACT IN REGARD TO THIS REPORT

Jeroen Hoevers

809-730-4200

(Area Code - Telephone Number)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report\*

AJSH & Co, LLP Chartered Accountants

(Name - if individual, state last, first, middle name)

C-7/ 227, Sector-7, Rohini

New Delhi

India

110085

(Address)

(City)

(State)

(Zip Code)

CHECK ONE:

☐

Certified Public Accountant

☐

Public Accountant

☒

Accountant not resident in United States or any of its possessions.

FOR OFFICIAL USE ONLY

\*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)

## OATH OR AFFIRMATION

I, Jeroen Hoevers, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of H. Rivkin & Company, Inc, as of December 31, 2019, 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:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Jeroen Hoevers  
Signature  
President  
Title

Annarose Swanhart  
Notary Public

ANNAROSE SWANHART  
A Notary Public of New Jersey  
My Commission Expires 8/7/2023

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

- ☒ (a) Facing Page.
- ☒ (b) Statement of Financial Condition.
- ☒ (c) Statement of Income (Loss) or, if there is other comprehensive income in the period(s) presented, a Statement of Comprehensive Income (as defined in §210.1-02 of Regulation S-X).
- ☒ (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.
- ☒ (l) 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).**

H. RIVKIN AND COMPANY, INC.

FINANCIAL STATEMENTS  
AND SUPPLEMENTARY INFORMATION  
(OTHER LEGAL AND REGULATORY REQUIREMENTS)

December 31, 2019

H. RIVKIN AND COMPANY, INC.

TABLE OF CONTENTS

December 31, 2019

	<u>PAGE</u>
<u>Report of independent registered public accounting firm</u>	1
<u>Financial statements</u>	
Statement of financial condition	3
Statement of income	4
Statements of changes in stockholder's equity	6
Statements of cash flows	6
Notes to financial statements	7 – 12
<u>Supplementary information - other legal and regulatory requirements</u>	13
Schedule I - Computation of net capital pursuant to SEC Rule 15c3-1	14
Schedule II – Computation for determining of reserve requirements pursuant to rule 15c3-3	15
Schedule III – Information relating to possession or control requirements pursuant to rule 15c3-3	16
<u>Report on Exemption provisions</u>	17
Report of independent registered public accounting firm	18
Management assertions regarding exemption provisions	19



## Report of the Independent Registered Public Accounting Firm

To the Board of Directors of  
**H. Rivkin and Company, Inc.**

### Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of H. Rivkin and Company, Inc. (the "Company") as of December 31, 2019 and the related statements of operations, changes in stockholder's equity and cash flows for the year then ended, and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Company as of December 31, 2019, and the results of its operations and its cash flows for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

### Basis for Opinion

These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on the Company's financial statements based on our audit. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) ("PCAOB") and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

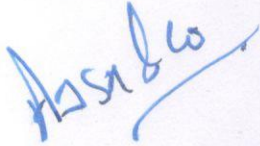
We conducted our audit in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement, whether due to error or fraud. Our audit included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our audit also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audit provide a reasonable basis for our opinion.

### Supplementary Information

The supplementary information contained in Schedule I, II and III ("Supplemental Information") has been subjected to audit procedures performed in conjunction with the audit of Company's financial statements. The supplemental information is the responsibility of the Company's management. Our audit procedures included determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable and performing procedures to test the completeness and accuracy of the information presented in the supplemental information.

---

In forming our opinion on the supplemental information, we evaluated whether the supplemental information, including its form and content, is presented in conformity with 17 CFR § 240.17a-5. In our opinion, the schedules I, II and III are fairly stated, in all material respects, in relation to the financial statements as a whole.



AJSH & Co LLP

We have served as the Company's Auditor since 2019.

New Delhi, India  
February 29, 2020

H. RIVKIN AND COMPANY, INC.  
STATEMENT OF FINANCIAL CONDITION  
December 31, 2019

ASSETS	
Cash	\$ 3,308
Brokers receivable	105,090
Deferred tax asset	78,542
Property and equipment, net	<u>629</u>
Total assets	<u><u>\$ 187,569</u></u>
LIABILITIES AND STOCKHOLDER'S EQUITY	
Liabilities	
Accounts payable	\$ 7,956
Total liabilities	<u>7,956</u>
Stockholder's equity	
Common stock - par value \$0.01	
Authorized - 200,000 shares	
Issued - 25,000 shares	
Outstanding - 25,000 shares	250
Additional paid-in-capital	280,789
Accumulated deficit	<u>(101,426)</u>
Total stockholder's equity	<u>179,613</u>
	<u><u>\$ 187,569</u></u>

H. RIVKIN AND COMPANY, INC.  
STATEMENT OF INCOME  
For The Year Ended December 31, 2019

Revenues	
Commission Income	\$ 305,606
Interest and Dividend Income	494
Other Income	<u>1</u>
Total Revenues	<u>306,101</u>
Employee compensation and benefits	29,639
Commisisions- Brokers	70,969
Rent	7,200
Legal and professional services	25,331
Licenses and registration	3,690
Payroll and miscellaneous taxes	46,131
Clearing costs	46,307
Other	<u>15,639</u>
Total expenses	<u>244,906</u>
Income (loss) before income tax	61,195
Income tax benefit (provision)	<u>13,186</u>
Net Income (loss)	\$ <u>48,009</u>



H. RIVKIN AND COMPANY, INC.  
STATEMENT OF CHANGES IN STOCKHOLDER'S EQUITY  
For The Year Ended December 31, 2019

	Total	Common stock par value \$0.01	Additional paid-in capital	Accumulated deficit
	<u>          </u>	<u>          </u>	<u>          </u>	<u>          </u>
Stockholder's equity at December 31, 2019	\$ 201,574	\$ 250	\$ 350,759	\$ (149,435)
Stockholders withdrawals	(69,970)	-	(69,970)	-
Net Income (loss)	<u>48,009</u>	<u>-</u>	<u>-</u>	<u>48,009</u>
Stockholder's equity at December 31, 2019	<u>\$ 179,613</u>	<u>\$ 250</u>	<u>\$ 280,789</u>	<u>\$ (101,426)</u>

H. RIVKIN AND COMPANY, INC.  
STATEMENT OF CASH FLOWS  
For The Year Ended December 31, 2019

Cash Flows From operating activities	
Net Income	\$ 48,009
Depreciation	132
Deferred Tax Benefit	12,378
Adjustment to reconcile net income to net cash provided by (used in) operating activities	
Decrease (Increase) in receivable	11,009
Increase (Decrease) in account payable	<u>(2,390)</u>
Net cash provided by (used in) operating activities	<u><b>69,137</b></u>
Cash flow used in financing activities	
Stockholder withdrawals	<u>69,970</u>
Net cash used in financing activities	<u><b>69,970</b></u>
Net Decrease (Increase) in Cash	(833)
Cash at December 31, 2018	<u>4,141</u>
Cash at December 31, 2019	\$ <u><u>3,308</u></u>
<u>Supplemental disclosure</u>	
Cash paid during the year for :	
Income Taxes	\$ <u>22</u>
Interest	\$ <u>-</u>

H. RIVKIN AND COMPANY, INC.  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2019

**Note 1 – Summary of Significant Accounting Policies**

**Business Activity**

H. Rivkin and Company, Inc. (the "Company") was incorporated in the State of New York on March 2, 1992. The Company is a registered broker-dealer in securities under the Securities and Exchange Act of 1934. The Company is a member of the Financial Industry Regulatory Authority ("FINRA"), the Securities Exchange Commission ("SEC"), and the Securities Investor Protections Corporation ("SIPC").

On March 31, 2015, the Company's stockholders entered into a Purchase/Sale Agreement to sell 100% of their outstanding stock in the Company to the members of New Deventer Enterprises, LLC (the purchaser). On May 15, 2015, the purchaser had applied and received approval as a broker/dealer with FINRA. FINRA approval has been granted and the purchaser now owns 100% of the stock in the Company.

The Company is engaged in business as a securities broker-dealer and active in the secondary market for equities, corporate bonds, and bank loans.

The Parent is committed to contributing capital to fund the broker dealer if needed.

Under its membership agreement with FINRA and pursuant to Rule 15c3-3(k)(2)(ii), the Company is exempt from the requirement of Rule 15c3-3 under the Securities Exchange Act of 1934 pertaining to the possession or control of customer assets and reserve requirements.

**Method of Accounting**

The books for accounting reflect transactions on the accrual method of accounting. For income tax reporting the Company has adopted the cash method.

**Cash and Cash Equivalents**

Cash and cash equivalents consist primarily of cash on deposit, certificates of deposit, money market accounts, and investment grade commercial paper that are readily convertible into cash and purchased with original maturities of three months or less.

**Property and Equipment**

Property and equipment are recorded at cost. Expenditures for major additions and improvements are capitalized, and minor replacements, maintenance, and repairs are charged to expense as incurred. When property and equipment are retired or otherwise disposed of, the cost and accumulated depreciation are removed from the accounts and any resulting gain or loss is included in the results of operations for the respective period. Depreciation is provided over the estimated useful lives of the related assets using the straight-line method for financial statement purposes. The Company uses other depreciation methods (generally accelerated) for tax purposes where appropriate. The estimated useful lives for property and equipment are 5-7 years.

**Statement of Cash Flows**

The Company is in compliance with Accounting Standards Codification (ASC) Topic 230, Statement of Cash Flows, and has adopted the indirect method of presenting its statement of cash flows.

H. RIVKIN AND COMPANY, INC.  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2019

**Note 1 – Summary of Significant Accounting Policies (continued)**

**Investments Inventory and Fair Value**

The Company classifies its debt and marketable equity securities into held-to-maturity, trading, or available-for-sale categories. Debt securities are classified as held-to-maturity when the Company has the positive intent and ability to hold the securities to maturity. Debt securities for which the Company does not have the intent or ability to hold to maturity are classified as available for sale. Held-to-maturity securities are recorded as either short-term or long-term on the balance sheet based on contractual maturity date and are stated at amortized cost. Marketable securities that are bought and held principally for the purpose of selling them in the near term are classified as trading securities and are reported at fair value, with unrealized gains and losses recognized in earnings. Debt and marketable equity securities not classified as held-to-maturity or as trading are classified as available-for-sale and are carried at fair market value, with the unrealized gains and losses, net of tax, included in the determination of comprehensive income and reported in shareholders' equity.

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

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

- Level 1 inputs are quoted prices (unadjusted) in active markets for identical assets or liabilities the Company has the ability to access.
- Level 2 inputs are inputs (other than quoted prices included within level I) that are observable for the asset or liability, either directly or indirectly.
- Level 3 are unobservable inputs for the asset or liability and rely on management's own judgments about the assumptions that market participants would use in pricing the asset or liability.

The fair value of substantially all securities is determined by quoted market prices and are classified as Level 1. The estimated fair value of securities for which there are no quoted market prices is based on similar types of securities that are traded in the market and are classified as Level 2. Gains or losses on securities sold are based on the specific identification method.

**Income Taxes**

The Company, organized in the state of New Jersey as a corporation, files a corporation tax return.



H. RIVKIN AND COMPANY, INC.  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2019

**Note 1 – Summary of Significant Accounting Policies (continued)**

**Income Taxes (continued)**

Income taxes are based on financial statement income with a deferred tax provision (if applicable) to reflect the tax effect of timing differences between financial statement income and taxable income. The Company has adopted the provisions of FASB ASC 740-10, "Accounting for Uncertainty in Income Taxes." The standard prescribes a recognition threshold and measurement attribute for financial statement recognition and measurement of a tax position taken or expected to be taken in a tax return and disclosures required. Under this standard, an entity may only recognize or continue to recognize tax positions that meet a "more likely than not" threshold. The Company has determined that there are no material uncertain tax positions that require recognition or disclosure in the financial statements.

The objectives of accounting for income taxes are to recognize the amount of taxes payable or refundable for the current year and deferred tax liabilities and assets for the future tax consequences of events that have been recognized in the Company's financial statements or tax returns. A current tax liability or asset is recognized for the estimated taxes payable or refundable on tax returns for the current year. A deferred tax liability or asset is recognized for the future tax temporary differences and/or carryforwards. (See Note 9).

The Company files Federal as well as New Jersey tax returns. The company's tax returns are no longer subject to tax examinations by federal or state taxing authorities for years before 2013.

**Financial Instruments**

The Company's financial instruments are cash and cash equivalents, brokers' receivable, prepaid expenses, accrued expenses, accounts payable, and income taxes payable. The recorded values of cash and cash equivalents, brokers receivable, broker payable, accrued expenses and related payables, and income taxes payable approximate their fair values based on their short-term nature. The recorded values of inventory - securities approximate their fair value based on market quotes.

**Use of Estimates**

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 the 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.

**Securities Transactions and Revenue Recognition**

Securities transactions (and related commission revenue and expenses if applicable) are recorded on a trade date basis.

H. RIVKIN AND COMPANY, INC.  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2019

**Note 2 – Concentrations of Credit Risk**

At times during the year, the Company maintained balances in bank accounts which exceeded the federally insured limit of \$250,000. These balances fluctuated during the year. Management monitors regularly the financial condition of the banking institutions along with their balances of cash and cash equivalents and tries to keep the risk to a minimum.

**Note 3 – Brokers' Receivable**

The clearing and depository operations for the Company's transactions are provided by Wedbush Clearing. December 31, 2019, the account balance was \$101,260.

**Note 4 – Deposit with Clearing Broker**

Pursuant to the clearing agreement with Wedbush Clearing ("Clearing Broker"), the Company introduces all of its securities transactions to the clearing broker on a fully disclosed basis. The Clearing Broker has custody of the Company's cash balances which serve as collateral for any amounts due to the Clearing Broker as well as collateral for securities sold short or securities purchased on margin. Interest is paid monthly on these cash deposits at the average overnight repurchase rate. The balance at December 31, 2019 was \$4,039.

**Note 5 – Property & Equipment**

Property and equipment are recorded net of accumulated depreciation and summarized by major classifications as follows:

		<u>Useful Life</u>
Furniture and fixtures	\$ 19,255	5-7 years
Office equipment	15,547	5-7 years
Automobile	<u>15,404</u>	5-7 years
	50,206	
Less: accumulated depreciation	<u>(49,578)</u>	
Property and equipment, net	<u>\$ 629</u>	

Depreciation expense for the year ended December 31, 2019 was \$132.

**Note 6 – Commitments and Contingencies**

*Commitments*

From November 2018 forward, the Company has been on a month-to-month lease with a payment of \$600 per month. Rent expense for the year ending December 31, 2019 was \$7,200, as shown on the statement of income.

*Contingencies*

The Company was named as an interested party in a settlement involving owners of its parent company. The settlement had no effect on the Company's operations, assets or liabilities.

The Company had no other commitments, no contingent liabilities and had not been named as a defendant in any lawsuit at December 31, 2019, or during the year then ended.

H. RIVKIN AND COMPANY, INC.  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2019

**Note 7 – Related Party Transactions**

The Company had no related party transactions during the year ended December 31, 2019.

**Note 8 – Net Capital Requirement**

As a registered broker-dealer and member firm of the National Association of Securities Dealers, Inc., the Company is subject to the Uniform Net Capital Rule 15c3-1 of the Securities and Exchange Commission. It computes its net capital under the aggregate indebtedness method, which requires that minimum net capital be equal to the greater of \$5,000 or 6-2/3% of aggregate indebtedness, as defined. At December 31, 2019, the Company had net capital of \$100,442 which exceeded its required net capital by \$95,442. The Company's ratio of aggregate indebtedness (\$7,956) to net capital was 0.08 to 1, which is less than the 15 to 1 maximum allowed.

**Note 9 – Income Taxes**

Current income taxes are based on the taxable income for the year, as measured by the current year's tax returns. The deferred tax adjustment is the amount required to adjust the deferred tax asset to that expected benefit to be incurred in future years. An assumption inherent in an enterprise's statements of financial position prepared in accordance with generally accepted accounting principles is that reported amounts of assets and liabilities will be recovered and settled, respectively. Based on that assumption, the deferred tax liability has been estimated using the tax rates in effect at the present time.

The provision for income tax expenses (benefits) at December 31, 2019, is comprised of the following:

Current income tax expense (benefit)	
Federal	\$ -
State	808
Total current income tax expense (benefit)	<u>808</u>
Deferred income tax expense (benefit)	
Federal	12,161
State	217
Total deferred income tax expense (benefit)	<u>12,378</u>
Total provision for income tax expense (benefit)	<u><u>\$ 13,186</u></u>

Deferred taxes arise due to the Company's net operating loss carryforwards. For the year ended December 31, 2019, the Company has available \$369,522 in net operating loss carryforwards, expiring beginning 2029.

H. RIVKIN AND COMPANY, INC.  
NOTES TO FINANCIAL STATEMENTS  
DECEMBER 31, 2019

**Note 10 – Guarantees**

FASB ASC 460, Guarantees, requires the Company to disclose information about its obligations under certain guarantee arrangements. FASB ASC 460 defines guarantees as contracts and indemnification agreements that contingently require a guarantor to make payments to the guaranteed party based on changes in an underlying factor (such as an interest or foreign exchange rate, security or commodity price, an index or the occurrence or nonoccurrence of a specified event) related to an asset, liability or equity security of a guaranteed party. This guidance also defines guarantees as contracts that contingently require the guarantor to make payments to the guaranteed party based on another entity's failure to perform under an agreement as well as indirect guarantees of indebtedness of others.

The Company has issued no guarantees at December 31, 2019, or during the year then ended.

**Note 11 – Subsequent Events**

The Company has evaluated events subsequent to the statement of financial condition date for items requiring recording or disclosure in the financial statements. The evaluation was performed through the date the financial statements were available to be issued. Based upon this review, the Company has determined that there were no events which took place that would have a material impact on its financial statements.

**Note 12 - Recent Accounting Pronouncements**

Financial Accounting Standards Board ("FASB") Accounting Standards Update ("ASU") 2014-09, Revenue from Contracts with Customers: Topic 606, also referred to as Accounting Standards Codification Topic 606 ("ASC Topic 606"), supersedes nearly all existing revenue recognition guidance under GAAP. ASC Topic 606 requires a principle-based approach for determining revenue recognition. The core principle is that an entity should recognize revenue to depict the transfer of goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. ASC Topic 606 is effective for the Company as of its year ended December 31, 2018. ASC Topic 606 had no material impact on the Company's financial statements.

In February 2016, the FASB issued ASU No. 2016-02, Leases (Topic 842), which supersedes the existing guidance for lease accounting. ASU 2016-02 requires lessees to recognize leases with terms longer than 12 months on their balance sheets. It requires different patterns of recording lease expense for finance and operating leases. It also requires expanded lease agreement disclosures. Lessor accounting is largely unchanged. ASU 2016-02 is effective for the Company as of its year ending December 31, 2019. Management has determined that ASU 2016-02 did not have a material impact on the Company's financial statements.



SUPPLEMENTARY INFORMATION  
OTHER LEGAL AND REGULATORY REQUIREMENTS

H. RIVKIN AND COMPANY, INC.  
SCHEDULE I - COMPUTATION OF NET CAPITAL  
PURSUANT TO SEC RULE 15c3-1  
As of December 31, 2019

Total stockholder's equity		\$ 179,613
Less: non-allowable assets		
Property and equipment	\$ (629)	
Deferred tax asset	(78,542)	
Other asset	<u>-</u>	
Total non-allowable asset		<u>79,171</u>
Net capital		100,442
6 2/3 percent of net aggregate indebtedness	\$ 530	
Minimum dollar net capital required	<u>\$ 5,000</u>	<u>5,000</u>
Excess net capital		<u>\$ 95,442</u>
Aggregate indebtedness		<u>7,956</u>
Ratio of Aggregate indebtedness to net capital		<u>0.08:1</u>

There was no material difference between the net capital computation shown here and the net capital computation shown on the Company's unaudited amended Form X-17A-5 report dated December 31, 2019.

**H. RIVKIN AND COMPANY, INC.**  
**SCHEDULE II – COMPUTATION FOR DETERMINING OF RESERVE**  
**REQUIREMENTS PURSUANT TO RULE 15c3-3**  
**AS OF DECEMBER 31, 2019**

A computation of reserve requirements is not applicable to H. Rivkin and Company, Inc. as the Company qualifies for exemption under Rule 15c3-3(k)(2)(ii).

**H. RIVKIN AND COMPANY, INC.**  
**SCHEDULE III – INFORMATION RELATING TO POSSESSION OR CONTROL REQUIREMENTS PURSUANT TO**  
**RULE 15c3-3**  
**AS OF DECEMBER 31, 2019**

Information relating to possession or control requirements is not applicable to H. Rivkin and Company, Inc. as the Company qualifies for exemption under Rule 15c3-3(k)(2)(ii).



**H. Rivkin and Company, Inc.**  
**Report on Exemption Provisions**  
**For the Year Ended December 31, 2019**

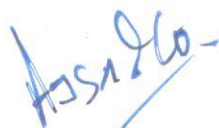
### Report of Independent Registered Public Accounting Firm

To the Board of Directors of  
H. Rivkin and Company, Inc.

We have reviewed management's statements, included in the accompanying H. Rivkin and Company, Inc.'s Exemption Report, in which (1) H. Rivkin and Company, Inc. identified the following provisions of 17 C.F.R. §15c3-3(k) under which the Company claimed an exemption from 17 C.F.R. §240.15c3-3: (k)(2)(ii) (the "exemption provisions") and (2) the Company stated that they met the identified exemption provisions throughout the most recent fiscal year without exception. The Company's management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about the Company's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

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



**AJSH & Co LLP**

New Delhi, India  
February 29, 2020

## Management Assertions Regarding Exemption Provisions

We, as members of management of H. Rivkin and Company, Inc. ("the Company"), are responsible for compliance with the annual reporting requirements under Rule 17a-5 of the Securities Exchange Act of 1934. Those requirements compel a broker or dealer to file annual reports with the Securities Exchange Commission (SEC) and the broker or dealer's designated examining authority (DEA). One of the reports to be included in the annual filing is an exemption report prepared by an independent public accountant based upon a review of assertions provided by the broker or dealer. Pursuant to that requirement, the management of the Company hereby makes the following assertions:

The Company claims exemption from the custody and reserve provisions of Rule 15c3-3 by operating under the exemption provided by Rule 15c3-3, Paragraph (k)(2)(ii).

The Company met the identified exemption provision without exception throughout the year ended December 31, 2019.

**H. Rivkin and Company, Inc.**

By:

  
(Jeroen Hoevers, Managing Stockholder)

2-27-2020  
(Date)