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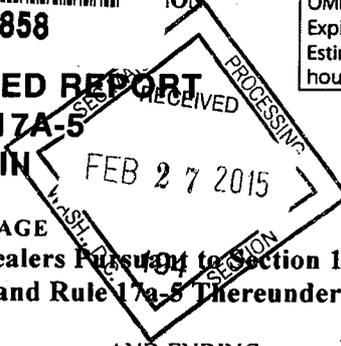


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ANNUAL AUDITED REPORT
FORM X-17A-5
PART I



SEC FILE NUMBER
B- 66906

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 01/01/14 AND ENDING 12/31/14
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER: Ullico Investment Company Inc.

OFFICIAL USE ONLY
FIRM I.D. NO.

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

1625 Eye Street, NW

(No. and Street)

Washington

DC

20006

(City)

(State)

(Zip Code)

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

(Area Code - Telephone Number)

B. ACCOUNTANT IDENTIFICATION

INDEPENDENT PUBLIC ACCOUNTANT whose opinion is contained in this Report*

Ernst & Young LLP

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

2005 Market Street, Suite 700

Philadelphia,

PA

19103

(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)

SEC 1410 (06-02)

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.

OATH OR AFFIRMATION

I, Adam Fried, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of Ullico Investment Company Inc. of December 31, 20 14, 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:

[Handwritten Signature]
Signature
Chief Financial Officer
Title

[Handwritten Signature]
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.
(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).



**FINANCIAL STATEMENTS AND SUPPLEMENTARY
INFORMATION**

Ullico Investment Company, Inc.

Year Ended December 31, 2014

With Report of Independent Registered Public Accounting Firm

Ullico Investment Company, Inc.
Financial Statements and Supplementary Information

Year Ended December 31, 2014

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Ernst & Young LLP
One Commerce Square
Suite 700
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Philadelphia, PA 19103
Tel: +1 215 448 5000
Fax: +1 215 448 4069

Report of Independent Registered Public Accounting Firm

The Board of Directors of Ullico Investment Company, Inc.

We have audited the accompanying statement of financial condition of Ullico Investment Company, Inc., (the Company) as of December 31, 2014, and the related statements of income, changes in stockholders' equity, and cash flows for the year then ended that are filed pursuant to Rule 17a-5 under the Securities Exchange Act of 1934. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. 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 Ullico Investment Company, Inc. at December 31, 2014, and the results of its operations and its cash flows for the year then ended in conformity with U.S. generally accepted accounting principles.

The accompanying information contained in Schedules I, II and III has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. Such information is the responsibility of the Company's management. Our audit procedures included determining whether the 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. In forming our opinion on the information, we evaluated whether such information, including its form and content, is presented in conformity with Rule 17a-5 under the Securities Exchange Act of 1934. In our opinion, the information is fairly stated, in all material respects, in relation to the financial statements as a whole.

Ernst & Young LLP

February 26, 2015

Ullico Investment Company, Inc.
Statement of Financial Condition

As of December 31, 2014

Assets	
Cash and cash equivalents	\$ 454,484
Short-term investment	399,989
Intercompany tax receivable	106,102
Prepaid assets	24,572
Deferred income taxes	6,669
Accrued investment income	65
Total assets	<u>991,881</u>
Liabilities	
Compensation payable	\$ 195,084
Intercompany payable	852
Total liabilities	<u>195,936</u>
Stockholder's Equity	
Common stock (\$1 par value; 1,000 shares authorized, issued, and outstanding)	1,000
Additional paid-in capital	249,000
Retained earnings	545,945
Total stockholder's equity	<u>795,945</u>
Total liabilities and stockholder's equity	<u>\$ 991,881</u>

The accompanying notes are an integral part of these financial statements.

Ullico Investment Company, Inc.

Statement of Income

For the Year Ended December 31, 2014

Revenues	
Commissions	\$ 2,737,809
Interest income	109
Total revenues	<u>2,737,918</u>
Expenses	
Allocated operating expenses	2,289,466
Allocated compensation and related expenses	508,638
Professional fees	153,793
Insurance expense	70,680
Regulatory fees and expenses	12,769
Total expenses	<u>3,035,346</u>
Loss before income tax provisions	<u>(297,428)</u>
State income tax expense	2,256
Federal income tax benefit	<u>(104,888)</u>
Total tax benefit	<u>(102,632)</u>
Net loss	<u>\$ (194,796)</u>

The accompanying notes are an integral part of these financial statements.

Ullico Investment Company, Inc.
Statement of Changes in Stockholder's Equity

For the Year Ended December 31, 2014

	Shares of Common Stock	Common Stock	Additional Paid-in Capital	Retained Earnings	Total Stockholder's Equity
Balance, December 31, 2013	1,000	1,000	249,000	740,741	990,741
Net loss	-	-	-	(194,796)	(194,796)
Balance, December 31, 2014	\$ 1,000	\$ 1,000	\$ 249,000	\$ 545,945	\$ 795,945

The accompanying notes are an integral part of these financial statements.

Ullico Investment Company, Inc.

Statement of Cash Flows

For the Year Ended December 31, 2014

Cash flows from operating activities	
Net loss	\$ (194,796)
Adjustments to reconcile net loss to net cash provided by operating activities:	
Deferred income taxes	1,214
Increase (decrease) in operating assets and liabilities:	
Short-term investment	300,002
Prepaid assets	1,975
Intercompany receivable	31,500
Accrued investment income	287
Compensation payable	128,341
Intercompany payable	<u>(4,903)</u>
Net cash provided by operating activities	263,620
Cash and cash equivalents at beginning of year	<u>190,864</u>
Cash and cash equivalents at end of year	<u>\$ 454,484</u>
Supplemental disclosure of cash flow information	
Income tax payments (paid to parent)	<u>-</u>

The accompanying notes are an integral part of these financial statements.

Ullico Investment Company, Inc.

Notes to Financial Statements

December 31, 2014

1. Organization and Nature of Business

Ullico Investment Company, Inc. (the Company), a wholly owned subsidiary of Ullico Inc. (Ullico), was incorporated in 2004 as a broker-dealer registered with the U.S. Securities and Exchange Commission (SEC) and is a member of the Financial Industry Regulatory Authority (FINRA). The Company markets group annuity contracts and private investment funds that are established, owned, and/or managed by affiliates.

The Company is a component of a larger business enterprise, and its officers, personnel and other support are provided by that entity. Substantially all of its revenue is derived from placement agent fees, which represent a percentage of the investment management fees earned by Ullico Investment Advisors, Inc. (UIA) and Union Labor Life Insurance Company (ULL), both wholly owned subsidiaries of Ullico. The operating results or financial condition would have been significantly different had the Company been autonomous.

2. Significant Accounting Policies and Use of Estimates

Basis of Presentation

The Company's financial statements are prepared in accordance with U.S. generally accepted accounting principles (GAAP) which may require the use of management estimates and assumptions. Actual results could differ from those estimates.

The Company and other affiliated entities that provide services to the Company are under common ownership and management control. The existence of this control could result in the Company's operating results or financial position being significantly different from those that would have been obtained if the Company were autonomous.

Revenue Recognition

Revenue is recognized as earned in accordance with respective placement agent agreements between the Company and other entities. Under the respective placement agent agreements, the Company receives a percentage of investment management fees earned by ULL and UIA for serving as a placement agent.

Ullico Investment Company, Inc.
Notes to Financial Statements (continued)

2. Significant Accounting Policies (continued)

Income Taxes

The Company is included in the consolidated federal income tax return filed by Ullico. Pursuant to an intercompany tax-sharing agreement with Ullico Inc., the Company provides for income taxes on a separate return filing basis. The tax-sharing agreement also provides that the Company will receive benefit for net operating losses, capital losses, and tax credits; which may not be usable on separate return basis to the extent such items may be utilized in the consolidated federal income tax returns of Ullico Inc. Federal income taxes are calculated as if the Company filed on a separate return basis, and the amount of current tax or benefit calculated is either, remitted to, or received from Ullico.

Deferred income tax assets and liabilities result from temporary differences between the tax bases of assets and liabilities and their reported amounts in the financial statements that will result in taxable or deductible amounts in future years. The amount of current and deferred tax asset is recognized as of the date of the financial statements, utilizing currently enacted tax laws and rates. Deferred tax expenses or benefits are recognized in the financial statements for the changes in deferred tax liabilities or assets between years.

Cash and Cash Equivalents

Cash and cash equivalents consist of highly liquid investments purchased with an original maturity of three months or less.

Short – Term Investment

The short – term investment consists of an investment in a U.S. Treasury bill with an original maturity between six months and a year.

Financial Instruments

The Company's financial instruments consist primarily of cash, cash equivalents, and short-term investments. The Company believes all of the financial instruments are recorded at values that approximate fair value due to the short-term nature of these instruments.

Ullico Investment Company, Inc.
Notes to Financial Statements (continued)

2. Significant Accounting Policies (continued)

Fair Value Measurements

The Company has adopted ASC 820, Fair Value Measurements and Disclosures, for all financial instruments accounted for at fair value on a recurring basis in the Company's financial statements. ASC 820 established a new framework for measuring fair value and expands related disclosures.

Broadly, the framework requires fair value to be determined based on the price that would be received for an asset or paid to transfer a liability (an exit price) in an orderly transaction between market participants. It also establishes market or observable inputs as the preferred source of values, followed by assumptions based on hypothetical transactions in the absence of market inputs.

ASC 820 specifies that a hierarchy of valuation techniques be determined for each asset based on whether the inputs to the valuation technique for those assets are observable or unobservable. Observable inputs reflect market data corroborated by independent sources while unobservable inputs reflect assumptions that are not observable in an active market or are developed internally. These two types of inputs create three valuation hierarchy levels:

- Level 1 valuations reflect quoted market or exchange prices for the actual or identical assets or liabilities in active markets.
- Level 2 valuations reflect inputs other than quoted prices in Level 1, which are observable. The inputs can include some or all of the following into a valuation model:
 - quoted prices on similar assets in active markets
 - quoted prices on actual assets that are not active
 - inputs other than quoted prices such as yield curves, volatilities, or prepayments speeds
 - inputs derived from market data
- Level 3 valuations reflect valuations in which one or more of the significant valuation inputs are not observable in an active market, there is limited if any market activity, and/or are based on management inputs into a valuation model

The Company maintains policies and procedures to value instruments using the best and most relevant data available. The fair value of the U.S. Treasury bill, \$399,989, is based upon independent market quotations, and it is characterized as Level 1. For the year ended December 31, 2014, there were no transfers between levels.

Ullico Investment Company, Inc.
Notes to Financial Statements (continued)

2. Significant Accounting Policies (continued)

Liabilities Subordinated to the Claims of General Creditors

At December 31, 2014, and during the year then ended, the Company had no liabilities subordinated to the claims of general creditors.

3. Recent Accounting Pronouncements

The following is an accounting pronouncement adopted in the current fiscal year.

Definition of a Public Business Entity

In December 2013, the Financial Accounting Standards Board ("FASB") issued guidance to determine which entities are within the scope of the Private Company Decision-Making Framework: A Guide for Evaluating Financial Accounting and Reporting for Private Companies by defining a public business entity. Companies defined as "public business entities" are not eligible for the alternative accounting guidance afforded to nonpublic companies. The Company has determined that it meets the definition of a public business entity and follows the criteria for public business entities when adopting guidance issued by the FASB.

The following is a recent accounting pronouncement effective for the Company in future years.

Revenue from Contracts with Customers

In May 2014, the FASB and International Accounting Standards Board ("IASB") issued guidance to clarify the principles for recognizing revenue and to develop a common revenue standard for U.S. GAAP and International Financial Reporting Standards ("IFRS"). Revenue must be recognized when the transfer of promised 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, has occurred. Implementation of this guidance will require the Company to identify contracts with customers, identify the performance obligations in the contracts, determine the transaction prices, allocate the transaction prices to the performance obligations in the contracts, and recognize revenue when or as the entity satisfies the performance obligations. The guidance becomes effective for the December 31, 2018 annual reporting period. The Company is assessing the effect of this guidance on the financial statements.

Ullico Investment Company, Inc.
Notes to Financial Statements (continued)

4. Income Taxes

The components of the tax benefit (expense) of the Company are as follows:

	<u>Amount</u>	<u>Percentage</u>
Federal income benefit on pre-tax income	104,098	35.00%
Tax effect of deduction for state income tax	790	0.30%
Federal income tax benefit	104,888	35.30%
State income tax expense	(2,256)	-0.80%
Total tax benefit	<u>102,632</u>	<u>34.50%</u>

The Company joins in the filing of a combined return in the District of Columbia (DC) with Ullico Inc. and Ullico Investment Advisors. The Company's share of the DC net operating loss is \$2,241,483, which begins to expire in 2030. The Company is required to file on a separate basis in Maryland and has a net operating loss of \$232,359, which begins to expire in 2034.

The intercompany receivable balance of \$106,102 results from the US federal net operating loss generated by the Company during the year. The Company is reimbursed for any net operating losses attributable to the Company on a separate entity basis in accordance with the tax sharing agreement. The deferred tax asset of \$6,669 includes a gross deferred tax asset related to state net operating losses. The Company believes it is not 'more likely than not' that, the Company will receive a tax benefit in the future for the state tax losses. As such, a valuation allowance has been recorded to offset the state net operating loss amount in full.

The deferred income tax asset at December 31, 2014 arises primarily as a result of amortization of start-up costs.

The Company assesses the likelihood, based on their technical merit, that tax positions taken or expected to be taken, will be sustained upon examination based on the facts, circumstances, and information available at the end of each period. The measurement of unrecognized tax benefits is adjusted when new information is available, or when an event occurs that requires a change. At December 31, 2014, the Company had no unrecognized tax benefit. Tax years that remain open and subject to examination by the Internal Revenue Service are calendar years 2011, and forward.

Ullico Investment Company, Inc.
Notes to Financial Statements (continued)

5. Net Capital Requirements

Pursuant to the Uniform Net Capital Rule (Rule 15c3-1) of the SEC, the Company is required to maintain minimum net capital, as defined under such provisions. The rule requires the Company to maintain minimum net capital equal to the greater of \$5,000 or 6% of aggregate indebtedness. At December 31, 2014, the Company's net capital was \$654,191, which was \$641,129 in excess of net capital requirements. The Company's ratio of aggregate indebtedness to net capital was 0.30 to 1.

6. Related-Party Transactions

The Company earns a placement agent fee derived from an agreed upon percentage of the annual investment management fees earned by UIA through the management of certain privately offered funds. The Company also earns a placement agent fee derived from an agreed upon percentage of the annual investment management fees earned by ULL through the offer of group annuity products. These revenues are reflected in the "Commissions" line item on the Statement of Income.

The Company has entered into an Expense Sharing Agreement (Agreement) with UIA whereby UIA allocates a certain percentage of expenses for rent, utilities, salaries and employee benefits, telephone, equipment, furniture and fixtures, accounting services and other general administrative and office expenses to the Company. These expenses are reflected in the "Allocated operating expenses" line item on the Statement of Income. All other operating expenses other than those allocated under the Agreement are paid directly by the Company.

7. Risks and Uncertainties

The Company maintains its cash in a bank account, which, at times, may exceed federally insured limits. The Company has not experienced any losses on this account. In the ordinary course of business, the Company enters into contracts that contain a variety of indemnifications. The Company's maximum exposure under these arrangements is unknown. However, the Company has not had prior claims or losses pursuant to these contracts and expects the risk of loss to be remote.

Additionally, approximately 52% of the revenues earned by the Company are generated by one group annuity product, representing a significant concentration. Management does not believe there to be any significant risk of loss of this product and its correlated revenues.

Supplementary Information

Ullico Investment Company, Inc.

Schedule I - Computation of Net Capital Pursuant to Rule 15c-3-1 of the
Securities and Exchange Commission

December 31, 2014

Total stockholder's equity qualified for net capital	\$ 795,945
Less non-allowable assets:	
Prepaid assets	(24,572)
Intercompany tax receivable	(106,102)
Deferred income taxes	(6,669)
	<u>(137,343)</u>
Less haircut on securities	(4,411)
Net capital	<u>654,191</u>
Aggregate indebtedness	<u>\$ 195,936</u>
Minimum capital required	
(greater of 6 2/3 % of aggregate indebtedness or \$5,000)	\$ 13,062
Net capital in excess of minimum required	<u>\$ 641,129</u>
Excess net capital at 10%, as defined	<u>\$ 634,597</u>
Ratio of aggregate indebtedness to net capital	<u>0.30 to 1</u>

Statement Pursuant to Paragraph (d)(4) of SEC Rule 17a-5

There are no material differences between this computation of net capital and the corresponding computation prepared by the Company and included in the unaudited Part IIA FOCUS filing on January 26, 2015.

Ullico Investment Company, Inc.

Schedule II - Statement Pursuant to SEC Rule 17a-5(d) Regarding Computation for
Determination of Reserves Requirements under Rule 15c3-3 of the
Securities and Exchange Commission

December 31, 2014

Computation for Determination of Reserve Requirement

The Company is exempt from the computation of reserve requirements under paragraph (k)(2)(i) of SEC rule 15c3-3 of the Securities Exchange Act of 1934.

Ullico Investment Company, Inc.

Schedule III – Statement Pursuant to SEC Rule 17a-5(d) Regarding Information
Relating to Possessions or Control of Securities under Rule 15c3-3 of the
Securities and Exchange Commission

December 31, 2014

Information Relating to Possession or Control Requirements

The Company did not maintain possession or control of any customer funds or securities as of December 31, 2014 and is exempt from the possession or control requirements under paragraph (k)(2)(i) of SEC rule 15c3-3 of the Securities Exchange Act of 1934.

SIPC-7

(33-REV 7/10)

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

General Assessment Reconciliation

For the fiscal year ended 12/31/2014
(Read carefully the instructions in your Working Copy before completing this Form)

SIPC-7

(33-REV 7/10)

TO BE FILED BY ALL SIPC MEMBERS WITH FISCAL YEAR ENDINGS

1. Name of Member, address, Designated Examining Authority, 1934 Act registration no. and month in which fiscal year ends for purposes of the audit requirement of SEC Rule 17a-5:

16-16-2020 MIXED AADC 220
088906 FINRA DEC
ULLICO INVESTMENT COMPANY INC
ATTN: S KOZIAKOVA/INVEST SERVS
8403 COLESVILLE RD 13TH FL
SILVER SPRING MD 20910-6331

Note: If any of the information shown on the mailing label requires correction, please e-mail any corrections to form@sipc.org and so indicate on the form filed.

Name and telephone number of person to contact respecting this form

Adam Fried (202) 354-8062

A. General Assessment (item 2e from page 2)	\$ 3,259.48
B. Less payment made with SIPC-6 filed (exclude interest)	1,570.00
<u>07/28/2014</u> Date Paid	
C. Less prior overpayment applied	0.00
D. Assessment balance due or (overpayment)	1,689.48
E. Interest computed on late payment (see instruction E) for _____ days at 20% per annum	0.00
F. Total assessment balance and interest due (or overpayment carried forward)	\$ 1,689.48
G. PAID WITH THIS FORM Check enclosed, payable to SIPC Total (must be same as F above)	\$ 1,689.48
H. Overpayment carried forward	\$(0.00)

3. Subsidiaries (S) and predecessors (P) included in this form (give name and 1934 Act registration number)

The SIPC member submitting this form and the person by whom it is executed represent thereby that all information contained herein is true, correct and complete.

Ullico Investment Company Inc.
(Name of Corporation, Partnership or other organization)

Adam Fried, CFO
(Authorized Signatures)
(Title)

Dated the 28 day of January 20 15

This form and the assessment payment is due 60 days after the end of the fiscal year. Retain the Working Copy of this form for a period of not less than 6 years, the latest 2 years in an easily accessible place.

SIPC REVIEWER Dates: Postmarked Received Reviewed

Calculations _____ Documentation _____ Forward Copy _____

Exceptions _____

Disposition of exceptions _____

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

Amounts for the fiscal period
beginning 1/1/2014
and ending 12/31/2014

Item No.

Eliminate cents

2a. Total revenue (FOCUS Line 12/Part IIA Line 9, Code 4030)

\$ 2,737,918

2b. Additions:

(1) Total revenues from the securities business of subsidiaries (except foreign subsidiaries) and predecessors not included above

(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

(7) Net loss from securities in investment accounts.

Total additions

2c. 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.

1,434,018

(2) Revenues from commodity transactions

(3) Commissions, floor brokerage and clearance paid to other SIPC members in connection with securities transactions.

(4) Reimbursements for postage in connection with proxy solicitation.

(5) Net gain from securities in investment accounts.

109

(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.

(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.

\$ _____

(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)

Total deductions

1,434,127

2d SIPC Net Operating Revenues

\$ 1,303,791

2e General Assessment @ 0025

\$ 3,259.48

(to page 1, line 2 A.)



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Philadelphia, PA 19103
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Report of Independent Registered Public Accounting Firm on Applying Agreed-Upon Procedures

To the Board of Directors and Management of Ullico Investment Company, Inc.:

We have performed the procedures enumerated below, which were agreed to by the Board of Directors and management of Ullico Investment Company, Inc., the Securities Investor Protection Corporation (SIPC), the Securities and Exchange Commission, and the Financial Industry Regulatory Authority, in accordance with Rule 17a-5(e)(4) of the Securities Exchange Act of 1934. We performed the procedures solely to assist the specified parties in evaluating Ullico Investment Company, Inc.'s compliance with the applicable instructions of the General Assessment Reconciliation (Form SIPC-7) for the year ended December 31, 2014. Ullico Investment Company, Inc.'s management is responsible for Ullico Investment Company, Inc.'s compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures we performed and our findings are as follows:

1. Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement record entries as follows:
 - a. We compared the amount on page 1, item 2B on Form SIPC-7 to the amount on check #411000079 paid to SIPC on July 28, 2014, noting no differences.
 - b. We compared the amount on page 1, item 2G on Form SIPC-7 to the amount on check #411000096 paid to SIPC on February 3, 2015, noting no differences.
2. Compared the Total revenues amount of \$2,737,918 reported on page 4 of the audited form X-17A-5 for the year ended December 31, 2014 with the Total revenue amount of \$2,737,918 reported on page 2, item 2a in Form SIPC-7 for the year ended December 31, 2014, noting no differences.
3. Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers as follows:
 - a. Agreed the deduction of \$1,434,018 reported on page 2, item 2c(1) of Form SIPC-7 to the supporting schedule prepared by the Company entitled Ullico Investment Company, Inc.'s Placement Fees which is derived from the accounting records used to prepare the audited form X-17A-5 for the year ended December 31, 2014, noting no differences.



Building a better
working world

- b. Agreed the deduction of \$109 of net gain from securities in investment accounts on line 2c(5) of Form SIPC-7 to the interest income reported on page 4 of the audited form X-17A-5 for the year ended December 31, 2014, noting no differences.
4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7 and in the related supporting schedules and working papers supporting the adjustments:
- a. Recalculated the arithmetical accuracy of the SIPC Net Operating Revenues on page 2, line 2d and the General Assessment at 0.0025 on page 2, line 2e of \$1,303,791 and \$3,259.48, respectively of the Form SIPC-7, noting no differences.
 - b. Recalculated the arithmetical accuracy of the Ullico Investment Company, Inc.'s Placement Fees schedule references in 3a above, 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 with the applicable instructions of the General Assessment Reconciliation (Form SIPC-7) for the year ended December 31, 2014. 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.

Ernst & Young LLP

February 26, 2015

Ullico Investment Company, Inc. Exemption Report

Ullico Investment Company, 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)(2)(i);
- (2) The Company met the identified exemption provisions in 17 C.F.R. §240.15c3-3(k) throughout the most recent fiscal year without exception.

Ullico Investment Company, Inc.

I, Adam Fried, swear and affirm that to my best knowledge and belief, this Exemption Report is true and correct.

By: 

Title: Vice President, Chief Financial Officer, FINOP, Secretary and Treasurer

Dated: 2/26/2015



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Report of Independent Registered Public Accounting Firm

The Board of Directors of Ullico Investment Company, Inc.

We have reviewed management's statements, included in the accompanying Ullico Investment Company, Inc.'s Exemption Report, in which (1) Ullico Investment Company, Inc. (the Company) identified the following provision of 17 C.F.R. § 15c3-3(k) under which the Company claimed an exemption from 17 C.F.R. § 240.15c3-3: (2)(i) (the "exemption provision") and (2) the Company stated that it met the identified exemption provision throughout the most recent fiscal year ended December 31, 2014 without exception. Management is responsible for compliance with the exemption provision 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)(i) of Rule 15c3-3 under the Securities Exchange Act of 1934.

This report is intended solely for the information and use of the Board of Directors, management, the SEC, FINRA, and other regulatory agencies that rely on Rule 17a-5 under the Securities Exchange Act of 1934 in their regulation of registered brokers and dealers, and other recipients specified by Rule 17a-5(d)(6) and is not intended to be and should not be used by anyone other than these specified parties.

February 26, 2015