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SEC 19006508

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

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

SEC FILE NUMBER
8-52121

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 01/01/2018 AND ENDING 12/31/2018
MM/DD/YY MM/DD/YY

A. REGISTRANT IDENTIFICATION

NAME OF BROKER-DEALER: **Burch & Company, Inc.**

OFFICIAL USE ONLY
FIRM I.D. NO.

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

4151 N Mulberry Drive, Suite 235

(No. and Street)

Kansas City
(City)

MO
(State)

64116
(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*

David Lundgren

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

505 N Murlen Rd.
(Address)

Olathe
(City)

KS
(State)

66062
(Zip Code)

CHECK ONE:

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

SEC Mail Processing
MAR 01 2019
Washington, DC

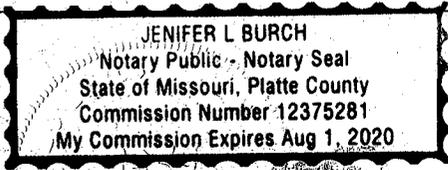
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*Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See Section 240.17a-5(e)(2)

RMS

OATH OR AFFIRMATION

I, Jessica B. Pastorino, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm of Burch & Company, Inc. of December 31, 2018, 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:



Signature

President Title

Notary Public

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).

BURCH & COMPANY, INC.

AUDITED FINANCIAL STATEMENTS

DECEMBER 31, 2018

BURCH & COMPANY, INC.

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DAVID LUNDGREN & COMPANY
CERTIFIED PUBLIC ACCOUNTANTS, CHARTERED
505 NORTH MUR-LEN ROAD
OLATHE, KANSAS 66062

DAVID B. LUNDGREN, MBA, CPA
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REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Stockholders
of Burch & Co., Inc.

Opinion on the Financial Statements

We have audited the accompanying statement of financial condition of Burch & Co., Inc. as of December 31, 2018, the related statements of operations, changes in stockholders' equity, changes in liabilities subordinated to claims of general creditors, and cash flows for the year then ended, and the related notes and schedules (collectively referred to as the financial statements). In our opinion, the financial statements present fairly, in all material respects, the financial position of Burch & Co., Inc. as of December 31, 2018, 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 Burch & Co., Inc.'s management. Our responsibility is to express an opinion on Burch & Co., Inc.'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 Burch & Co., Inc. 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 provides a reasonable basis for our opinion.

Supplemental Information

The Schedules I, II, III, and IV have been subjected to audit procedures performed in conjunction with the audit of Burch & Co., Inc.'s financial statements. The supplemental information is the responsibility of Burch & Co., Inc.'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 I, II, III, and IV are fairly stated, in all material respects, in relation to the financial statements as a whole.



We have served as Burch & Co., Inc.'s auditor since 2016.

Olathe, Kansas

February 27, 2019

BURCH & COMPANY, INC.
STATEMENT OF FINANCIAL CONDITION
DECEMBER 31, 2018

ASSETS

Cash	\$ 325,450
Accounts receivable:	
Success fees	200,000
Advisory, consulting and administrative fees	295,487
Officer and shareholder	11,407
Other	6,293
Prepaid expenses	62,343
Prepaid income taxes	800
Property and equipment, net of accumulated depreciation of \$58,510	<u>29,763</u>
Total assets	<u>\$ 931,543</u>

LIABILITIES AND STOCKHOLDER'S EQUITY

Liabilities	
Accounts payable	\$ 139,048
Commissions and fees payable	\$ 402,411
Payroll liabilities	49,705
Accrued interest payable	1,250
Accrued income taxes payable	17,627
Deferred taxes	14,355
Subordinated borrowings	<u>25,000</u>
Total liabilities	<u>649,396</u>
Stockholder's equity	
Common stock, \$1 par value, 30,000 shares authorized, 1,000 issued and outstanding	1,000
Additional paid-in capital	38,946
Retained earnings	<u>242,201</u>
Total stockholder's equity	<u>282,147</u>
Total liabilities and stockholder's equity	<u>\$ 931,543</u>

See notes to the financial statements.

BURCH & COMPANY, INC.
STATEMENT OF INCOME
FOR THE YEAR ENDED DECEMBER 31, 2018

REVENUES

Mergers and acquisitions success fees	\$ 14,811,435
Advisory and consulting fees	\$ 1,488,204
Administrative fees	<u>632,420</u>
Total revenues	<u>16,932,059</u>

EXPENSES

Commissions	15,240,455
Employee compensation and benefits	1,009,784
Professional services	243,125
Rent	21,835
Registration fees, insurance and bonding	189,248
Office expenses	42,391
Other administrative expenses	<u>52,501</u>
Total expenses	<u>16,799,339</u>

Income from operations 132,720

OTHER INCOME (EXPENSE)

Other income	4,199
Interest expense	<u>(1,875)</u>
Total other income (expense)	<u>2,324</u>

Income before income taxes 135,044

INCOME TAXES

Current expense	40,527
Deferred benefit	<u>(2,522)</u>

Net income \$ 97,039

See notes to the financial statements.

BURCH & COMPANY, INC.
STATEMENT OF CHANGES IN STOCKHOLDER'S EQUITY
FOR THE YEAR ENDED DECEMBER 31, 2018

	Common Stock	Additional Paid-in Capital	Retained Earnings	Total
Stockholder's equity, beginning of year	\$ 1,000	\$ 38,946	\$ 145,162	\$ 185,108
Net income	-	-	97,039	97,039
Stockholder's equity, end of year	<u>\$ 1,000</u>	<u>\$ 38,946</u>	<u>\$ 242,201</u>	<u>\$ 282,147</u>

See notes to the financial statements.

BURCH & COMPANY, INC.
STATEMENT OF CHANGES IN LIABILITIES SUBORDINATED
TO CLAIMS OF GENERAL CREDITORS
FOR THE YEAR ENDED DECEMBER 31, 2018

Subordinated borrowings, beginning of year	\$ 50,000
Repayment of subordinated borrowings	<u>(25,000)</u>
Subordinated borrowings, end of year	<u>\$ 25,000</u>

See notes to the financial statements.

BURCH & COMPANY, INC.
STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED DECEMBER 31, 2018

CASH FLOWS FROM OPERATING ACTIVITIES	
Net income	\$ 97,039
Adjustments to reconcile net income to net cash provided by operating activities	
Depreciation	8,484
Deferred tax benefit	(2,522)
(Increase) decrease in current assets and increase (decrease) in current liabilities	
Success, advisory, and consulting fees receivable	(362,781)
Other receivables	(1,293)
Prepaid expenses	3,282
Prepaid income taxes	29,873
Accounts, commissions and fees payable	285,435
Payroll tax liabilities	38,480
Income taxes payable	16,798
Accrued interest payable	(1,771)
Total adjustments	<u>13,985</u>
Net cash provided by operating activities	111,024
CASH FLOWS FROM FINANCING ACTIVITIES	
Repayment of subordinated borrowings	(25,000)
Officer and shareholder advances, net	<u>(482)</u>
Net cash used by financing activities	<u>(25,482)</u>
Increase in cash	85,542
Cash, beginning of year	<u>239,908</u>
Cash, end of year	<u>\$ 325,450</u>
Supplemental Disclosures:	
Interest paid during the year	<u>\$ 3,645</u>
Income taxes paid during the year	<u>\$ 3,534</u>

See notes to the financial statements.

BURCH & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS
DECEMBER 31, 2018

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Business Activity

Burch & Company, Inc. (the Company) is a broker-dealer registered with the Securities and Exchange Commission and is a member of the Financial Industry Regulatory Authority. The Company is primarily involved in licensing of mergers and acquisition professionals to accommodate any securities related to middle market mergers and acquisition transactions.

Basis of Accounting

The accompanying financial statements have been prepared on the accrual basis of accounting in conformity with accounting principles generally accepted in the United States of America ("U.S. GAAP").

Revenue Recognition

On January 1, 2018, the Company adopted ASU 2014-09 *Revenue from Contracts with Customers*, and all subsequent amendments to the ASU (collectively, "ASC 606"), which creates a single framework for recognizing revenue from contracts with customers that fall within its scope.

Revenue is measured based on a consideration specified in a contract with a customer. The Company recognizes revenue when it satisfies its contractual obligations by transferring control over goods or services to a customer. Though the scope of ASC 606 includes some mergers and acquisition (M&A) related fees, the adoption of ASC 606 did not have an impact on the financial statements.

Revenue from Contracts with Customers

Revenue from contracts with customers include M&A success, advisory and consulting fees. The recognition and measurement of these revenues is based on the assessment of the individual contract terms. Judgment is required to determine whether contractual obligations are satisfied at a point in time or over time; how to allocate fees where multiple services are identified; and when to recognize revenue based on the appropriate measure of the Company's progress under the contract.

BURCH & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS – CONTINUED
DECEMBER 31, 2018

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – CONTINUED

Recognition of M&A Success, Advisory and Consulting Fees

The Company has contracts to provide M&A advisory, consulting and transaction-based services. The revenue from advisory and consulting services are recognized over time as the customer receives the benefit of the services as they are provided. Success fees are recognized at the point in time that the M&A transaction is completed, generally the closing date of the transaction

Administrative Fee Revenue

The Company receives administrative fees under agreements with its independent contractor representatives for the use of its platforms and services. This revenue is recognized when billed in accordance with the terms of the agreements.

Success, Advisory, and Administrative Fees Receivable

Receivables are stated at the amount management expects to collect from outstanding balances. Management provides for probable uncollectible amounts through a charge to earnings and a credit to a valuation allowance based on its assessment of the current status of individual accounts, and balances that are still outstanding after reasonable collection efforts have been made are written-off. At December 31, 2018 it was determined that no valuation allowance was necessary

Concentrations-Financial Instruments

Financial instruments that potentially subject the Company to significant concentrations consist principally of cash and accounts receivable. The Company places its cash with high credit quality financial institutions which maintain FDIC insurance such that deposits are generally fully covered by insurance.

BURCH & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS – CONTINUED
DECEMBER 31, 2018

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – CONTINUED

Income Taxes and Tax Positions

Current and deferred income taxes are determined in accordance with FASB ASC Topic 740. Under FASB ASC Topic 740, the amount of current and deferred taxes payable or refundable is recognized 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. Deferred taxes relate to the use of accelerated depreciation methods and the election to expense property acquisitions for income tax purposes, and the deduction of certain prepaid expenses for tax purposes when paid and writing them off for book purposes over the period benefited.

The components of the deferred tax liability on the statement of financial condition as of December 31, 2018 relate to the following:

<u>Temporary Difference</u>		<u>Related Statement of Financial Condition Account</u>
Depreciation	\$ (1,543)	Property and equipment
Insurance	<u>15,898</u>	Prepaid expenses
Net deferred tax liability	<u>\$14,355</u>	

The current provision consists of \$30,502 of federal and \$10,025 of state and local taxes due on current year taxable income.

The FASB provides guidance for how uncertain tax positions should be recognized, measured, disclosed and presented in the financial statements. This requires the evaluation of tax positions taken or expected to be taken in the course of preparing the Company's tax returns to determine whether the tax positions are "more-likely-than-not" of being sustained "when challenged" or "when examined" by the applicable tax authority. Tax positions not deemed to meet the more-likely-than-not threshold would be recorded as a tax benefit or expense and liability in the current year. For the year ended December 31, 2018, management has determined that there are no material uncertain income tax positions. The Company's income tax returns are subject to examination by taxing authorities for a period of three years from the date they are filed. As of December 31, 2018, the tax returns for the years 2015 to 2017 are subject to examination.

BURCH & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS – CONTINUED
DECEMBER 31, 2018

NOTE 1 – SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – CONTINUED

Property and Depreciation

Property and equipment at December 31, 2018, consists of the following and is depreciated using accelerated and straight-line methods over the following lives:

	<u>Balance</u>	<u>Lives</u>
Office furniture and computer equipment	\$ 38,049	5 – 10 years
Automobile	<u>50,224</u>	5 years
	88,273	
Less accumulated depreciation	<u>(58,510)</u>	
	<u>\$ 29,763</u>	

Depreciation expense was \$8,484 in 2018.

Use of Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

Cash and Cash Equivalents

For purposes of the statement of cash flows, the Company defines cash equivalents as demand deposits, money market funds and any highly liquid debt instruments with a maturity of three months or less at the time of purchase.

NOTE 2 – NET CAPITAL REQUIREMENTS

The Company is subject to the Securities and Exchange Commission's Uniform Net Capital Rule (Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the percentage of aggregate indebtedness to net capital, both as defined, shall not exceed 1500%. At December 31, 2018, the Company had net capital of \$117,820 which was \$77,151 in excess of its required net capital of \$40,669. The percentage of aggregate indebtedness to net capital was 517.77%.

BURCH & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS – CONTINUED
DECEMBER 31, 2018

NOTE 3 – SUBORDINATED BORROWINGS

The borrowings under subordination agreements at December 31, 2018 are as follows:

5% loan due July 2, 2019	<u>\$ 25,000</u>
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The subordinated borrowings are available in computing net capital under the Securities and Exchange Commission's Uniform Net Capital Rule. To the extent that such borrowings are required for the Company's continued compliance with minimum net capital requirements, they may not be repaid.

NOTE 4 – RELATED PARTY TRANSACTIONS

Officer and Shareholder Receivables

During 2018, the Company made advances of \$573 to an officer and \$10,131 to a shareholder under a 3.5% demand note. Repayments on the shareholder note were \$10,222 and the balances outstanding at December 31, 2018 were \$11,407.

Subordinated Borrowings

During 2018, the Company paid \$1,250 of interest on the subordinated borrowing due an officer, and the outstanding balance was \$25,000 at December 31, 2018.

M&A Securities Group, Inc.

During the year, the Company engaged in various transactions with M&A Securities Group, Inc., a related entity. These transactions included the receipt of \$80,000 of business development fees in accordance with the terms of a recruiting and consulting fee agreement, and \$30,000 each for shared compliance services and the use of office space. At December 31, 2018, \$5,000 was due the Company for compliance services and office space use.

BURCH & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS – CONTINUED
DECEMBER 31, 2018

NOTE 5 – OPERATING LEASE

On May 15, 2015, the Company renewed their lease agreement for office space through July 31, 2020. The renewal also includes the guaranty of M&A Securities Group, Inc. Future minimum payments due under this lease are:

2019	\$ 53,268
2020	<u>31,746</u>
	<u>\$ 85,014</u>

2018 rental expense was \$21,835, net of the \$30,000 reimbursed by M&A Securities Group, Inc.

NOTE 6 – DEFINED CONTRIBUTION PLAN

The Company has established a Simplified Employee Pension plan which provides for contributions of up to 25% of employee compensation. Pension expense for the year ended December 31, 2018 was \$56,000.

NOTE 7 – LITIGATION AND CONTINGENCIES

In 2018 the Company was one of a number of defendants in a class action civil suit related to individual commercial real estate properties, all of which involved the same sponsor and issuer of securities from the 2006 to 2007 time periods. The properties were affected by the world-wide economic downturn, through the loss of tenants or an inability to refinance. The Company was a co-defendant with numerous other parties, including lenders, real estate brokers, title and escrow companies, attorneys and others. The Company's role was limited to serving as Managing Broker-Dealer and no claimants were customers of the Company. The claims in the case were similar, if not identical, to previous class action suits brought against the Company, all of which were dismissed in Orange County Superior Court. On July 31, 2018, the Honorable Kim Dunning of the Superior Court of California, County of Orange entered a final judgment in favor of Burch, with all causes of action against the Company dismissed and plaintiffs recovering nothing. Subsequent to the favorable judgment, plaintiffs made a motion to appeal and as of February 26, 2019 the case sits with the Court of Appeal of the State of California, Fourth Appellate District.

BURCH & COMPANY, INC.
NOTES TO FINANCIAL STATEMENTS – CONTINUED
DECEMBER 31, 2018

NOTE 7 – LITIGATION AND CONTINGENCIES-CONTINUED

This matter is being contested by the Company, however, the final outcome is uncertain and consequently no provision has been made for any potential liability. In the opinion of management, the amount of any loss, if any, that is not recovered from others would not be material to the Company's financial position.

NOTE 8 – SUBSEQUENT EVENTS

The Company has evaluated subsequent events through February 27, 2019, the date at which these financial statements were available to be issued and determined there have not been any events that have occurred that would require adjustments to or disclosure in the financial statements.

SUPPLEMENTARY INFORMATION

BURCH & COMPANY, INC.
SUPPLEMENTARY INFORMATION
DECEMBER 31, 2018

I. Computation of Net Capital Under SEC Rule 15c3-1

Total stockholder's equity	\$ 282,147
Subordinated borrowings allowable in the computation of net capital	25,000
Deferred tax liability	14,355
Non-allowable assets	<u>(203,682)</u>
Net capital	117,820
Minimum net capital required, the greater of \$5,000 or 6 2/3% of aggregate indebtedness	<u>(40,669)</u>
Excess net capital	<u>\$ 77,151</u>
Aggregate indebtedness:	
Total liabilities	\$ 649,396
Less deferred taxes	(14,355)
Less subordinated borrowings	<u>(25,000)</u>
Aggregate indebtedness	<u>\$ 610,041</u>
Percentage of aggregate indebtedness to net capital	517.77%

II. Computation for Determination of Reserve
Requirements under SEC Rule 15c3-3

The Company operates under the exemptive provisions of paragraph (k)(2)(B) of SEC Rule 15c3-3.

III. Information Relating to the Possession or Control
Requirements under SEC Rule 15c3-3

The Company has complied with the exemptive requirements of SEC Rule 15c3-3 and did not maintain possession or control of any customer funds or securities as of December 31, 2018.

IV. Reconciliation Pursuant to SEC Rule 17a-5(d)(2)

Net capital-original December 31, 2018 Form X-17A-5	\$ 102,989
Adjustment to original Form as amended February 27, 2019:	
Reversal of accounting change	16,755
Additional accounts payable	(2,589)
Income taxes payable to actual	<u>665</u>
Net capital per Schedule I above	<u>\$ 117,820</u>



Burch & Co. Inc.

EXEMPTION REPORT

During fiscal year 2018, to the best of knowledge and belief of Jessica B. Pastorino of Burch & Company, Inc., Burch & Company, Inc. operated pursuant to exemption 15c-3-3(k)(2)(i) as Burch & Company, Inc. did not hold funds or safe keep customer securities.

A handwritten signature in cursive script, appearing to read "Jessica B. Pastorino".

Jessica B. Pastorino

President

DAVID LUNDGREN & COMPANY
CERTIFIED PUBLIC ACCOUNTANTS, CHARTERED
505 NORTH MUR-LEN ROAD
OLATHE, KANSAS 66062

DAVID B. LUNDGREN, MBA, CPA
MAGGIE CHANG, CPA

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REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

To the Board of Directors and Stockholders'
of Burch & Co., Inc.

We have reviewed management's statements, included in the accompanying Exemption Report for year ended December 31, 2018, in which (1) Burch & Co., Inc. identified the following provisions of 17 C.F.R. §15c3-3(k) under which Burch & Co., Inc. claimed an exemption from 17 C.F.R. §240.15c3-3: (k)(2)(i) (exemption provisions) and (2) Burch & Co., Inc. stated that Burch & Co., Inc. met the identified exemption provisions throughout the most recent fiscal year without exception. Burch & Co., Inc.'s management is responsible for compliance with the exemption provisions and its statements.

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

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



Olathe, Kansas

February 27, 2019

DAVID LUNDGREN & COMPANY
CERTIFIED PUBLIC ACCOUNTANTS, CHARTERED
505 NORTH MUR-LEN ROAD
OLATHE, KANSAS 66062

DAVID B. LUNDGREN, MBA, CPA
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**REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM ON
APPLYING AGREED-UPON PROCEDURES**

Board of Directors of Burch & Co., Inc.

We have performed the procedures included in Rule 17a-5(e)(4) under the Securities Exchange Act of 1934 and with the Securities Investor Protection Corporation (SIPC) Series 600 Rules, which are enumerated below, which were agreed to by Burch & Co., Inc. (Company) and the SIPC, solely to assist you and the SIPC in evaluating the Company's compliance with the applicable instructions of the General Assessment Reconciliation (Form SIPC-7) for the year ended December 31, 2018. Management of the Company is responsible for its Form SIPC-7 and for its compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards of the Public Company Accounting Oversight Board (United States) and in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures we performed and our findings are as follows:

- 1) Compared the listed assessment payments in Form SIPC-7 with respective cash disbursement records entries, noting no differences;
- 2) Compared the Total Revenue amount reported on the Annual Audited Report Form X-17A-5 Part III for the year ended December 31, 2017 with the Total Revenue amount reported in Form SIPC-7 for the year ended December 31, 2017, noting no differences;
- 3) Compared any adjustments reported in Form SIPC-7 with supporting schedules and working papers, noting no differences;
- 4) Recalculated 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
- 5) 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 with the applicable instructions of the Form SIPC-7. 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.



Olathe, Kansas

February 27, 2019