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**K+K**  
SECURITIES, LLC

December 28, 2001

Mr. Mark Attar  
Division of Market Regulation  
U.S. Securities and Exchange Commission  
450 Fifth Street, N.W.  
Washington, D.C. 20549

Public Avail. Date: 12/28/01 0122200203  
Act Section Rule  
1934 17(a) 17a-5

Re: Audited Financial Statement

Dear Mr. Attar:

This letter is a request for relief from filing an audited financial statement for K+K Securities, LLC ("K+K") for the 2001 fiscal year. As I stated, in our conversation, K+K was just recently approved for membership with the NASD and SEC (December 21, 2001) and has not conducted any securities business. Moreover, filing an audited financial statement would be unduly expensive. We are requesting approval to include the 2001 financial information with the 2002 fiscal year filing.

Thank you for your assistance with this matter

Sincerely,

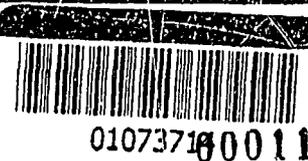


Kurt Hawkesworth  
Assistant General Counsel  
Director of Compliance



DIVISION OF  
MARKET REGULATION

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



NO ACT  
P.E 12-28-01  
8-53312

December 28, 2001

Mr. Kurt Hawkesworth  
Assistant General Counsel  
Director of Compliance  
K+K Securities, LLC  
900 Third Avenue, Suite 200  
New York, NY 10022

Act	Securities Exchange Act of 1934
Section	17
Rule	17a-5
Public Availability	December 28, 2001

Re: Annual Audited Financial Statement Filing Requirements Under Rule 17a-5

Dear Mr. Hawkesworth:

We have received your letter dated December 28, 2001, in which you request, on behalf of K+K Securities, LLC (the "Firm"), an exemption from the requirement that the Firm file a certified annual report of financial statements pursuant to Rule 17a-5 of the Securities Exchange Act of 1934 (17 CFR 240.17a-5) for the fiscal year ending December 31, 2001.

I understand the following facts to be pertinent to the Firm's request. The Firm's registration as a broker-dealer with the Securities and Exchange Commission ("Commission") became effective on December 21, 2001. The Firm is required, pursuant to paragraph (d) of Rule 17a-5, to file a certified annual report of financial statements on a calendar or fiscal year basis. The report must be as of the same fixed or determinable date each year unless a change is approved by the Firm's designated examining authority. The Firm chose December 31 as its year-end. Accordingly, an audited report of the Firm's financial statements must be prepared as of December 31, 2001. Because the Firm's registration with the Commission became effective on December 21, 2001, and the Firm has not yet begun to conduct a securities business, you have requested an exemption for the Firm from filing annual audit reports for the year-ended December 31, 2001.

Based on the foregoing facts, the Division of Market Regulation ("Division") will not recommend enforcement action to the Commission if the Firm does not file audited financial statements as of December 31, 2001. However, the annual report for the year ending December 31, 2002, must cover the entire period from December 21, 2001, the effective date of the Firm's registration with the Commission.

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Mr. Kurt Hawkesworth

December 28, 2001

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You should understand that this letter expresses a staff position with respect to enforcement only and does not purport to state any legal conclusion on this matter. The Division's position is confined to the facts as described herein. Any material change in circumstances may warrant a different conclusion and should be brought immediately to the Division's attention.

Sincerely,



Mark M. Attar  
Special Counsel

cc: Mr. Marc S. Voltz, NASD Regulation, Inc.