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SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549

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

SEC FILE NUMBER
8-52294

**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 JANUARY 1, 2009 AND ENDING DECEMBER 31, 2009  
MM/DD/YY MM/DD/YY

**A. REGISTRANT IDENTIFICATION**

NAME OF BROKER DEALER: **MCKIM CAPITAL, INC.**

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

**215 SUMMITT ROAD**

(No. and Street)

**WALNUT CREEK**

(City)

**CALIFORNIA**

(State)

**94598**

(Zip Code)

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

**JORDAN L. LOEWER**

**925-937-5238**

(Area Code - Telephone No.)

**B. ACCOUNTANT DESIGNATION**

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

**OHAB AND COMPANY, PA**

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

**100 E. SYBELIA AVENUE, SUITE 130**

(Address and City)

**FLORIDA**

(State)

**32751**

(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 audit 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).

Potential persons who are to respond to the collection of information contained in this form are required to respond unless the form displays a current valid OMB control number.

SEC 1410 (06-02)

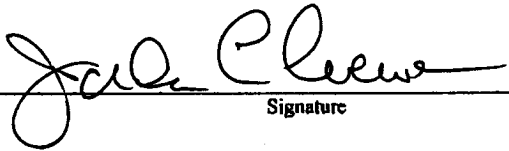
BB 9/16

OATH OR AFFIRMATION

I, JORDAN L. LOEWER, swear (or affirm) that, to the best of my knowledge and belief the accompanying financial statement and supporting schedules pertaining to the firm or MCKIM CAPITAL, INC., as of December 31, 2009 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:

N/A

SEE ATTACHED CALIFORNIA NOTARIAL CERTIFICATE

  
Signature  
CHIEF COMPLIANCE OFFICER  
Title

Public Notary

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 Proprietor's 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 15c3-1.
- (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).

# Jurat

State of California

County of Contra Costa

Subscribed and sworn to (or affirmed) before me on this 18<sup>th</sup> day of June, 2010 by Jordan L. Loewer

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

*E. Kendall*

Signature

(Notary seal)



## OPTIONAL INFORMATION

### INSTRUCTIONS FOR COMPLETING THIS FORM

The wording of all Jurats completed in California after January 1, 2008 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one which does contain proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

### DESCRIPTION OF THE ATTACHED DOCUMENT

(Title or description of attached document)

(Title or description of attached document continued)

Number of Pages \_\_\_\_\_ Document Date \_\_\_\_\_

(Additional information)

- State and County information must be the State and County where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date that the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
  - ◆ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
  - ◆ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document

**MCKIM CAPITAL, INC.**  
**FINANCIAL STATEMENTS**  
**December 31, 2009**

**MCKIM CAPITAL, INC.**  
**FINANCIAL STATEMENTS**  
**FOR THE YEAR ENDED DECEMBER 31, 2009**

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# Ohab and Company, P.A.

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Certified Public Accountants

100 East Sybelia Avenue, Suite 130  
Maitland, FL 32751

E-Mail: ohabco@earthlink.net

Phone: 407-740-7311  
Fax: 407-740-6441

## INDEPENDENT AUDITORS' REPORT

Board of Directors and Stockholders  
McKim Capital, Inc.  
Walnut Creek, CA

We have audited the accompanying statements of financial condition of McKim Capital, Inc. as of December 31, 2009 and the related statements of operations, changes in stockholder's equity, and cash flows for the year then ended that you are filing 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 auditing standards generally accepted in the United States of America. 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, evidenced 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 provide 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 McKim Capital, Inc. as of December 31, 2009 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.

Our audit was conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. The information contained in the schedule presented on pages 9 and 11 is presented for purposes of additional analysis and is not required part of the basic financial statements, but is supplementary information required by rule 17a-5 under the Securities Exchange Act of 1934. Such information has been subjected to the auditing procedures applied in the audit of the basic financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic financial statements taken as a whole.

*Ohab and Company, P.A.*

June 22, 2010

**MCKIM CAPITAL, INC.**

**STATEMENT OF FINANCIAL CONDITION**

December 31, 2009

**ASSETS**

**Assets:**

Cash and cash equivalents	\$	422
Commissions receivable		6,858
Deposits with clearing broker		<u>30,000</u>
	\$	<u><u>37,280</u></u>

**LIABILITIES AND STOCKHOLDERS' EQUITY**

**Liabilities:**

Accrued expenses	\$	518
Note payables		<u>27,500</u>
		<u>28,018</u>

**Stockholders' equity:**

Common stock, no par value; 500 shares authorized, issued and outstanding		102,608
Retained earnings (deficit)		<u>(93,346)</u>
		<u>9,262</u>
	\$	<u><u>37,280</u></u>

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

**MCKIM CAPITAL, INC.**

**STATEMENT OF OPERATIONS**  
For the Year Ended December 31, 2009

**Revenues:**

Commissions and fees	\$ 337,035
Other income	<u>427,737</u>
<b>Total revenues</b>	<u><u>764,772</u></u>

**Expenses:**

Clearing fees	117,947
Commission expense	557,737
Professional fees	14,099
Telephone and communications	4,007
Other operating expenses	<u>99,943</u>
<b>Total expenses</b>	<u><u>793,733</u></u>
<b>Net income (loss)</b>	<u><u>\$ (28,961)</u></u>

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



**MCKIM CAPITAL, INC.**

**STATEMENTS OF CHANGES IN STOCKHOLDERS' EQUITY**  
For the Year Ended December 31, 2009

	<u>Common Stock</u> <u>(no par)</u>	<u>Retained</u> <u>Earnings</u>	<u>Total</u>
<b>Balances, December 31, 2008</b>	\$ 102,608	\$ (64,385)	\$ 38,223
Net income (loss)		(28,961)	(28,961)
<b>Balances, December 31, 2009</b>	<u>\$ 102,608</u>	<u>\$ (93,346)</u>	<u>\$ 9,262</u>

The accompanying notes are an integral part of these financial statements

**MCKIM CAPITAL, INC.**

**STATEMENT OF CASH FLOWS**  
For the Year Ended December 31, 2009

<b>Cash flows from operating activities:</b>	
Net income (loss)	\$ (28,961)
Adjustments to reconcile net income to net cash flows from operating activities:	
(Increase) decrease in:	
Commissions receivable	15,715
Increase (decrease) in:	
Accrued expenses	(15,581)
	<hr/>
<b>Net cash used in operating activities</b>	<b>(28,827)</b>
	<hr/>
<b>Cash flows from financing activities:</b>	
Net activity under notes payable	27,500
	<hr/>
<b>Net cash provided in financing activities</b>	<b>27,500</b>
	<hr/>
Net decrease in cash and cash equivalents	(1,327)
<b>Cash and cash equivalents at beginning of period</b>	<b>1,749</b>
	<hr/>
<b>Cash and cash equivalents at end of period</b>	<b>\$ 422</b>
	<hr/> <hr/>

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

**MCKIM CAPITAL, INC.**

**NOTES TO FINANCIAL STATEMENTS**  
**December 31, 2009**

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

*Nature of Business*

McKim Capital, Inc. ("the Company") is a securities broker-dealer, registered with the Securities Exchange Commission ("SEC"), a member of the Financial Industry Regulatory Authority ("FINRA"), and a member of the Securities Investor Protection Corporation ("SIPC"). The Company began operations in August 2000. The Company's brokerage activity is transacted on a fully disclosed basis through a clearing broker.

The Company's commission income is derived from purchases and sales of securities on behalf of customers. The Company does not engage in proprietary trading activities. The Company also acts as a consultant and advisor for various start-up companies and may conduct capital raising services based on confidential private placement memorandums.

As is typical in the industry, the Company engages in activities with various financial institutions and brokers. In the event these counter parties do not fulfill their obligations, the Company may be exposed to risks.

*Cash and Cash Equivalents*

For purposes of reporting the statement of cash flows, the Company considers all cash accounts, which are not subject to withdrawal restrictions or penalties, and all highly liquid debt instruments purchased with a maturity of three months or less to be cash equivalents. Cash balances in excess of FDIC and similar insurance coverage are subject to the usual banking risks associated with funds in excess of those limits. At December 31, 2009, the Company had no uninsured cash balances.

*Estimates*

The preparation of financial statements in accordance 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 disclosure of contingent assets and liabilities at the date of the financial statements and revenues and expenses during the reporting period. Actual results could differ from those estimates.

*Income Taxes*

The provision for income taxes is computed using the asset and liability method, under which deferred tax assets and liabilities are recognized for the expected future tax consequences of temporary differences between the financial reporting and tax bases of assets and liabilities, and for operating losses and tax credit carryforwards. Deferred tax assets and liabilities are measured using the currently enacted tax rates that apply to taxable income in effect for the years in which those tax assets are expected to be realized or settled. The Company records a valuation allowance to reduce deferred tax assets to the amount that is believed more likely than not to be realized.

**MCKIM CAPITAL, INC.**

**NOTES TO FINANCIAL STATEMENTS**  
**December 31, 2009**

*Fair Value of Financial Instruments*

All of the Company's financial assets and liabilities are carried at market value or at amounts, which, because of their short-term nature, approximate current fair value.

**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 at amount equal to the greater of \$5,000 or 6 2/3% of aggregate indebtedness, and requires that the ratio of aggregate indebtedness to net capital not to exceed 15 to 1.

At December 31, 2009, the Company's had excess net capital of \$3,662 and a net capital ratio of 3.23 to 1.

**Note 3 – Financial Instruments with Off-Balance Sheet Risk and Concentrations of Credit Risk**

The Company's customer securities activities are transacted on either a cash or margin basis. In margin transactions, the Company's Clearing Broker extends credit to the customer, subject to various regulatory and internal margin requirements, collateralized by cash and securities in the customer's account. As a result of guaranteeing customer margin balances carried by the Clearing Broker, the Company may be exposed to off-balance sheet risk in the event margin requirements are not sufficient to fully cover losses the customer may incur. At December 31, 2009, margin accounts guaranteed by the Company guaranteed by the Company were not material.

The Company is also exposed to off-balance sheet risk of loss on transactions during the period from the trade date to the settlement date, which is generally three business days. If the customer fails to satisfy its contractual obligations to the Clearing Broker, the Company may have to purchase or sell financial instruments at prevailing market prices in order to fulfill the customer's obligations. Settlement of these transactions is not expected to have a material effect on the Company's financial position.

The Company seeks to control the risks associated with its customer activities by requiring customers to maintain margin collateral in compliance with various regulatory and the Clearing Broker's guidelines. The Company monitors required margin levels daily and, pursuant to such guidelines, require customers to deposit additional collateral, or to reduce positions, when necessary.

The Company maintains cash and other deposits with banks and brokers, and, at times, such deposits exceed applicable insurance limits. The Company reduces its exposure to credit risk by maintaining such deposits with high quality financial institutions.

**NSM SECURITIES, INC.**  
**NOTES TO FINANCIAL STATEMENTS**  
**November 30, 2009**

**Note 4 – Notes Payable**

Notes payable consist of the following:

Note payable to individual for registration fees, payable on January 31, 2010, interest accrues on the daily unpaid principal at the rate of ten percent (10%) per annum and is payable on the maturity date.	\$ 12,500
Note payable to individual for disputed compensation, payable in installments of \$5,000 April 1, 2010, July 1, 2010 and December 31, 2010 respectively and is non-interest bearing.	<u>15,000</u>
	<u>\$ 27,500</u>

**Note 5 – Income Taxes**

At December 31, 2009, the Company had approximately \$127,000 of net operating losses (“NOL”) carry-forwards for federal and state income purposes. These losses are available for future years and expire through 2029. Utilization of these losses may be severely or completely limited if the Company undergoes an ownership change pursuant to Internal Revenue Code Section 382.

The tax effect of carryforwards that give rise to the deferred tax asset consist of the following:

	<b>December 31, 2009</b>
<b>Deferred tax asset:</b>	
Net operating loss carryforwards	\$ 48,260
Deferred tax assets	48,260
Less: Valuation allowance	(48,260)
<b>Net deferred tax asset</b>	<b>\$ -</b>

At December 31, 2009, the Company has recorded a deferred tax asset of \$48,260. The Company has taken a 100% valuation allowance against the deferred asset, due to the uncertainty of realizing the future tax benefits.

The Company did not pay any income taxes during the year ended December 31, 2009.

**Note 6 –Contingencies and Commitments**

The Company is subject to oversight by FINRA. Issues with certain policies and procedures are currently under review. Management states there will not be a material impact on their financial statements as a result of the review, however, the effects on the organization are not known.

**MCKIM CAPITAL, INC.**  
**COMPUTATION AND RECONCILIATION OF NET CAPITAL UNDER RULE 15c3-1**  
**OF THE SECURITIES AND EXCHANGE COMMISSION**  
**As of December 31, 2009**

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<b>Computation of basic net capital requirements:</b>	
Total stockholder's equity qualified for net capital	\$ 9,262
Deductions:	
Total non-allowable assets	<u>-</u>
Net capital before haircuts and securities positions	<u>9,262</u>
Haircuts:	
Securities positions	<u>600</u>
	<u>600</u>
Net capital	8,662
Minimum net capital requirements:	
6 2/3% of total aggregate indebtedness (\$28,018)	
Minimum dollar net capital for this broker-dealer (\$5,000)	
Net capital requirement (greater of above two requirements)	<u>\$ 5,000</u>
Net capital in excess of required minimum	<u>\$ 3,662</u>
Reconciliation with Company's computation (included in Part IIA of Form X-17A-5 as of December 31, 2009)	
Net capital, as reported in Company's Part IIA Focus Report	\$ 36,681
Adjustments:	
Accrued expenses	(518)
Notes payable	(27,500)
Rounding	<u>(1)</u>
Net capital, per December 31, 2009 audited report, as filed	<u>\$ 8,662</u>

**MCKIM CAPITAL, INC.  
COMPUTATION OF AGGREGATE INDEBTEDNESS  
UNDER RULE 17a OF THE SECURITIES AND EXCHANGE COMMISSIONS  
AS OF DECEMBER 31, 2009**

**Total aggregate indebtedness:**

Accrued expenses	\$ 518
Notes payable	<u>27,500</u>
Aggregate indebtedness	<u><u>\$ 28,018</u></u>

**Ratio of aggregate indebtedness  
to net capital**

3.23 to 1

**MCKIM CAPITAL, INC.**  
**INFORMATION RELATING TO EXEMPTIVE PROVISION**  
**REQUIREMENTS UNDER SEC RULE 15c-3**  
**AS OF DECEMBER 31, 2009**

With respect to the Computation for Determination of Reserve Requirements under Rule 15c3-3, the Company qualifies for exemption under subparagraph (K) (2) (ii) of the Rule.

With respect to the Information Relating to Possession and Control Requirements under Rule 15c3-3, the Company qualifies for exemption under subparagraph (K) (2) (ii) of the Rule.



# Ohab and Company, P.A.

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Certified Public Accountants

100 East Sybelia Avenue, Suite 130  
Maitland, FL 32751

E-Mail: ohabco@earthlink.net

Phone: 407-740-7311

Fax: 407-740-6441

## **REPORT ON INTERNAL CONTROL STRUCTURE REQUIRED BY SEC RULE 17a-5 FOR A BROKER-DEALER CLAIMING EXEMPTION FROM SEC RULE 15C3-3**

Board of Directors  
McKim Capital, Inc.  
Walnut Creek, CA

In planning and performing our audit of the financial statements and supplemental schedules of McKim Capital, Inc. (the "Company") as of and for the year ended December 31, 2009 in accordance with auditing standards generally accepted in the United States of America, We considered the Company's internal control over financial reporting ("including control") as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control. Accordingly, we do not express an opinion on the effectiveness of the Company's internal control.

Also, as required by rule 17a-5(g)(1) of the Securities and Exchange Commission (SEC), we have made a study of the practices and procedures followed by the Company including consideration of control activities for safeguarding securities. This study included tests of such practices and procedures that we considered relevant to the objectives stated in rule 17a-5(g) in making the periodic computations of aggregate indebtedness (or aggregate debits) and net capital under rule 17a-3(a)(11) and for determining compliance with the exemptive provisions of rule 15c3-3. Because the Company does not carry securities accounts for customers or perform custodial functions relating to customer securities, we did not review the practices and procedures followed by the Company in any of the following:

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

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

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

A *control deficiency* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A *significant deficiency* is a control deficiency, or combination of control deficiencies, that adversely affects the entity's ability to initiate, authorize, record, process, or report financial data reliably in accordance with generally accepted accounting principles such that there is more than a remote likelihood that a misstatement of the entity's financial statements that is more than inconsequential will not be prevented or detected by the entity's internal control.

A material weakness is significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected by the entity's internal control.

Our consideration of the internal control was for the limited purpose described in the first and second paragraphs and would not necessarily identify all deficiencies in internal control that might be material weaknesses. We did not identify any material deficiencies in internal control and control activities for safeguarding securities that we consider to be material weaknesses, as defined above. However, the Company is subject to regulations that require annual audits to be completed sixty days subsequent to year-end. The Company is late in their filing.

We understand that practices and procedures that accomplish the objectives referred to in the second paragraph of this report are considered by the SEC to be adequate for its purposes in accordance with the Securities Exchange Act of 1934 and related regulations, and that practices and procedures that do not accomplish such objectives in all material respects indicate a material inadequacy for such purposes. Based on this understanding and on our study, we believe that the Company's practices and procedures, were adequate at December 31, 2009 to meet the SEC's objectives.

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

*Olak and Company, PA*  
June 22, 2010

# Ohab and Company, P.A.

100 E. Sybelia Ave. Ste. 130  
Maitland, FL 32751

*Certified Public Accountants*  
E-Mail: ohabco@earthlink.net

Phone 407-740-7311  
Fax 407-740-6441

## INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors  
McKim Capital, Inc.  
215 Summitt Road  
Walnut Creek, CA

In accordance with Rule 17a-5(e)(4) under the Securities Exchange Act of 1934, we have performed the procedures enumerated below with respect to the accompanying Schedule of Assessment and Payments [Transitional Assessment Reconciliation (Form SIPC-7T)] to the Securities Investor Protection Corporation (SIPC) for the year ended December 31, 2009, which were agreed to by McKim Capital, Inc. and the Securities and Exchange Commission, Financial Industry Regulatory Authority, Inc. and SIPC, solely to assist you and the other specified parties in evaluating McKim Capital, Inc.'s compliance with the applicable instructions of the Transitional Assessment Reconciliation (Form SIPC-7T). McKim Capital, Inc.'s management is responsible for the McKim Capital, 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-7T with respective cash disbursement records entries noting no differences;
2. Compared the amounts reported on the audited Form X-17A-5 (FOCUS Report) for the year ended December 31, 2009, with the amounts reported in Form SIPC-7T for the year ended December 31, 2009 noting no differences;
3. Compared any adjustments reported in Form SIPC-7T with supporting schedules and working papers noting no differences;
4. Proved the arithmetical accuracy of the calculations reflected in Form SIPC-7T and in the related schedules and working papers supporting there were no adjustments, noting no differences; and
5. Compared the amount of any payment due to the current assessment with the Form SIPC-7T on which it was originally computed noting no differences.

We were not engaged to, and did not conduct an examination, the objective of which would be the expression of an opinion on compliance. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the specified parties listed above and is not intended to be and should not be used by anyone other than these specified parties.

*Ohal and Company, PA*

June 22, 2010

**MCKIM CAPITAL, INC.**  
**TRANSITIONAL ASSESSMENT RECONCILIATION**  
**PURSUANT TO FORM SIPC-7T**  
**December 31, 2009**

General assesment per Form SIPC-7T, including interest	813
Less payment made with Form SIPC-4	150
Less payment made with Form SIPC-6	<u>145</u>
Amount due with Form SIPC-7T	<u>\$ 518</u>