BrokerCheck Report

KA ASSOCIATES, LLC

CRD# 32029

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Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**
- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.
- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.
- **Where did this information come from?**
- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
    - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
    - information that regulators report regarding disciplinary actions or allegations against firms or brokers.
- **How current is this information?**
- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.
- **What if I want to check the background of an investment adviser firm or investment adviser representative?**
- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at https://www.adviserinfo.sec.gov. In the alternative, you may search the IAPD website directly or contact your state securities regulator at http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414.
- **Are there other resources I can use to check the background of investment professionals?**
- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.
-

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For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.

KA ASSOCIATES, LLC

CRD# 32029

SEC# 8-45640

Main Office Location

2121 AVENUE OF THE STARS
9TH FLOOR
LOS ANGELES, CA 90067
Regulated by FINRA Los Angeles Office

Mailing Address

2121 AVENUE OF THE STARS
9TH FLOOR
LOS ANGELES, CA 90067

Business Telephone Number

310.282.7900

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Nevada on 05/10/2024.

Its fiscal year ends in June.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 35 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 7 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1

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Firm Profile

This firm is classified as a limited liability company.

This firm was formed in Nevada on 05/10/2024.

Its fiscal year ends in June.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

KA ASSOCIATES, LLC

Doing business as KA ASSOCIATES, LLC

CRD# 32029

SEC# 8-45640

Main Office Location

2121 AVENUE OF THE STARS
9TH FLOOR
LOS ANGELES, CA 90067

Regulated by FINRA Los Angeles Office

Mailing Address

2121 AVENUE OF THE STARS
9TH FLOOR
LOS ANGELES, CA 90067

Business Telephone Number

310.282.7900

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Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	KAYNE, RICHARD ALAN
Is this a domestic or foreign entity or an individual?	Individual
Position	SHAREHOLDER
Position Start Date	03/2015
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	KAYNE ANDERSON CAPITAL ADVISORS LP 104536
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	SHAREHOLDER
Position Start Date	12/2021
Percentage of Ownership	10% but less than 25%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	O'NEIL, MICHAEL JOSEPH JR 6043576
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT, CHIEF COMPLIANCE OFFICER, AND SECRETARY
Position Start Date	10/2019

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Firm Profile

Direct Owners and Executive Officers (continued)

Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	STAPLETON, PAUL FRANCIS 4848451
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP, CFO, PFO, POO, AND TREASURER
Position Start Date	03/2015
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

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Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

No information reported.

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Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

This firm was previously:	KA ASSOCIATES, INC.
Date of Succession:	05/10/2024
Predecessor CRD#:	32029
Description	THE REGISTRANT CONVERTED FROM A NEVADA S CORPORATION TO A NEVADA LIMITED LIABILITY COMPANY ON MAY 10, 2024. THIS CHANGE IN FORM OF ORGANIZATION DOES NOT RESULT IN A CHANGE IN OWNERSHIP OR CONTROL OF THE REGISTRANT. THE SUCCESSOR HAS RESPONSIBILITY FOR ALL OF THE ASSETS AND LIABILITIES. NAME OF SUCCESSOR IS KA ASSOCIATES, LLC.

This firm was previously:	KA ASSOCIATES, INC.
Date of Succession:	05/10/2024
Predecessor CRD#:	32029
Description	CHANGE IN FORM OF ORGANIZATION FROM NEVADA CORPORATION TO A NEVADA LIMITED LIABILITY COMPANY. NAME OF SUCCESSOR IS KA ASSOCIATES, LLC.

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Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 35 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	04/20/1993

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	07/20/1993

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Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alaska	Approved	12/03/1993
Arizona	Approved	10/27/2003
California	Approved	07/23/1993
Colorado	Approved	09/23/1993
Connecticut	Approved	03/11/1994
District of Columbia	Approved	03/12/2014
Florida	Approved	03/16/1994
Georgia	Approved	10/30/2015
Hawaii	Approved	02/09/2012
Idaho	Approved	06/17/2016
Illinois	Approved	11/18/1993
Maryland	Approved	09/21/1993
Massachusetts	Approved	11/09/1993
Michigan	Approved	12/01/1993
Minnesota	Approved	09/07/1994
Mississippi	Approved	05/03/2018
Missouri	Approved	11/07/2014
Montana	Approved	09/17/1993
Nevada	Approved	10/15/1993
New Jersey	Approved	03/18/1994
New York	Approved	10/19/1993
North Carolina	Approved	01/30/1995
Ohio	Approved	01/31/2011
Oklahoma	Approved	02/03/1994
Oregon	Approved	11/12/1993
Pennsylvania	Approved	06/08/1995
Rhode Island	Approved	01/17/2012
South Carolina	Approved	01/16/2019
Tennessee	Approved	01/25/2019
Texas	Approved	04/21/1994
Utah	Approved	11/09/2016
Vermont	Approved	09/12/2016
Virginia	Approved	10/09/2014
Washington	Approved	03/10/1994
Wisconsin	Approved	11/11/1993

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Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 7 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Underwriter or selling group participant (corporate securities other than mutual funds)
Mutual fund retailer
Municipal securities broker
Put and call broker or dealer or option writer
Non-exchange member arranging for transactions in listed securities by exchange member
Other - BROKER OR DEALER RETAILING CORPORATE DEBT SECURITIES.

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.
This firm does not engage in other non-securities business.

Non-Securities Business Description:

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Firm Operations

Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

Name:	NATIONAL FINANCIAL SERVICES LLC
CRD #:	13041
Business Address:	200 SEAPORT BLVD BOSTON, MA 02210
Effective Date:	03/09/2016
Description:	CLEARING AGENT

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Firm Operations

Industry Arrangements

This firm does have books or records maintained by a third party.

Name:	NATIONAL FINANCIAL SERVICES LLC
CRD #:	13041
Business Address:	200 SEAPORT BLVD BOSTON, MA 02210
Effective Date:	03/09/2016
Description:	CLEARING AGENT

This firm does have accounts, funds, or securities maintained by a third party.

Name:	NATIONAL FINANCIAL SERVICES LLC
CRD #:	13041
Business Address:	200 SEAPORT BLVD BOSTON, MA 02210
Effective Date:	03/09/2016
Description:	CLEARING AGENT

This firm does have customer accounts, funds, or securities maintained by a third party.

Name:	NATIONAL FINANCIAL SERVICES LLC
CRD #:	13041
Business Address:	200 SEAPORT BLVD BOSTON, MA 02210
Effective Date:	03/09/2016
Description:	CLEARING AGENT

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.

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Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- **in control of**
- **controlled by**
- **or under common control with**

the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

KAYNE PRIVATE ENERGY INCOME MANAGER, L.P. is under common control with the firm.

CRD #:	328834
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	05/01/2023
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC. THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC #801-46991).

KAYNE PARTNERS MANAGER, L.P. is under common control with the firm.

CRD #:	330651
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	05/01/2023
Foreign Entity:	No
Country:	

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Firm Operations

Organization Affiliates (continued)

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC. THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC #801-46991).

KAYNE PARTNERS FUND V GP, LLC is under common control with the firm.

CRD #: 319441

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 06/01/2020

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC. THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC #801-46991).

KAYNE PARTNERS FUND IV GP, LLC is under common control with the firm.

CRD #: 319457

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 09/01/2016

Foreign Entity: No

Country:

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Firm Operations

Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC. THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC #801-46991).

KARE MANAGER HOLDINGS, L.P. is under common control with the firm.

CRD #:	313708
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC, THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MGMT, INC, THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, LP (KACALP). KARE GP, LLC IS THE GP OF KARE MGR HOLDINGS, LP KACALP IS THE MANAGING MEMBER AND MAJORITY OWNER OF KARE GP, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KARE MGR HOLDINGS, LP. THE ENTITY IS A RELYING ADVISER OF KACALP (SEC#:801-46991).

KAYNE PARTNERS FUND V MANAGER, L.P. is under common control with the firm.

CRD #:	312778
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021

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Firm Operations

Organization Affiliates (continued)

Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND GP OF KAYNE PARTNERS FUND V MANAGER, L.P. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAYNE PARTNERS FUND V MANAGER, L.P. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAPC MANAGER, L.P. is under common control with the firm.

CRD #:	308100
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MGMT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND GP OF KAYNE SENIOR CREDIT IV MANAGER, L.P. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAYNE SENIOR CREDIT IV MGR, L.P. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KPEIF II GP, LLC is under common control with the firm.

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Firm Operations

Organization Affiliates (continued)

CRD #: 301499

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO, FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KPEIF II GP, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KPEIF II GP, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KADM MANAGER, LLC is under common control with the firm.

CRD #: 296477

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO AN OWNER AND MANAGING MEMBER OF KADM MANAGER, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES,

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Firm Operations

Organization Affiliates (continued)

LLC. AND THE CCO OF KADM MANAGER, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KPEIF GP, LLC is under common control with the firm.

CRD #:	295948
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO AN OWNER AND MANAGING MEMBER OF KPEIF GP, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KPEIF GP, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KCOF SLP, LP is under common control with the firm.

CRD #:	295946
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES,

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Firm Operations

Organization Affiliates (continued)

LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND GP OF KCOF SLP, LP. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CHIEF COMPLIANCE OFFICER OF KCOF SLP, LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE SENIOR CREDIT III MANAGER, L.P. is under common control with the firm.

CRD #: 295943

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES,LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS,INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MGMT,INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS,LP., WHO IS ALSO THE MAJORITY OWNER AND GP OF KAYNE SENIOR CREDIT III MANAGER,LP. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES,LLC. AND THE CHIEF COMPLIANCE OFFICER OF KAYNE SENIOR CREDIT III MANAGER,LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE SENIOR CREDIT II MANAGER, L.P. is under common control with the firm.

CRD #: 295942

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

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Firm Operations

Organization Affiliates (continued)

Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT,INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, LP., WHO IS ALSO THE MAJORITY OWNER AND MANAGING PARTNER OF KAYNE SENIOR CREDIT II MANAGER, LP. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES,LLC. AND THE CCO OF KAYNE SENIOR CREDIT II MANAGER,LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE PARTNERS FUND IV MANAGER, L.P. is under common control with the firm.

CRD #:	295940
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND GP OF KAYNE PARTNERS FUND IV MANAGER, L.P. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAYNE PARTNERS FUND IV MANAGER, L.P. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE PARTNERS FUND III MANAGER, L.P. is under common control with the firm.

CRD #:	295939
Business Address:	717 TEXAS AVENUE

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Firm Operations

Organization Affiliates (continued)

	22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND GP OF KAYNE PARTNERS FUND III MANAGER, L.P. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAYNE PARTNERS FUND III MANAGER, L.P. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE NEWROAD GP, L.P. is under common control with the firm.

CRD #:	295938
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND GENERAL PARTNER OF KAYNE NEWROAD GP, L.P. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CHIEF COMPLIANCE OFFICER OF KAYNE NEWROAD GP, L.P. THE ENTITY IS

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Firm Operations

Organization Affiliates (continued)

A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE MUNICIPAL OPPORTUNITY INVESTORS, L.P. is under common control with the firm.

CRD #:	295937
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES,LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS,INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MGMT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS,LP, WHO IS ALSO THE MAJORITY OWNER AND GP OF KAYNE MUNICIPAL OPPORTUNITY INVESTORS,LP. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES,LLC. AND THE CCO OF KAYNE MUNICIPAL OPPORTUNITY INVESTORS,LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE KS CREDIT GP, LLC is under common control with the firm.

CRD #:	295936
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes

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Firm Operations

Organization Affiliates (continued)

Description: RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GP OF KAYNE ANDERSON CAPITAL ADVISORS, LP, WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KAYNE KS CREDIT GP, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAYNE KS CREDIT GP, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE ANDERSON REAL ESTATE ADVISORS II, LLC is under common control with the firm.

CRD #: 295928

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES,LLC. & THE MAJORITY SHAREHOLDER OF KA HOLDINGS,INC, THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MGMT,INC, THE GP OF KAYNE ANDERSON CAPITAL ADVISORS,LP, WHO IS ALSO THE MAJORITY OWNER & MANAGING MEMBER OF KAYNE ANDERSON REAL ESTATE ADVISORS II,LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES,LLC. & THE CCO OF KAYNE ANDERSON REAL ESTATE ADVISORS II,LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE ANDERSON GROWTH ADVISORS, LLC is under common control with the firm.

CRD #: 295926

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

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Firm Operations

Organization Affiliates (continued)

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES,LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS,INC, THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC, THE GP OF KAYNE ANDERSON CAPITAL ADVISORS,LP, WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KAYNE ANDERSON GROWTH ADVISORS,LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES,LLC. AND THE CCO OF KAYNE ANDERSON GROWTH ADVISORS,LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAYNE ANDERSON GROWTH ADVISORS II, LLC is under common control with the firm.

CRD #: 295925

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES,LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS,INC., THE HOLDING CO. FOR KAYNE ANDERSON INVESTMENT MANAGEMENT,INC, THE GP OF KAYNE ANDERSON CAPITAL ADVISORS,LP, WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KAYNE ANDERSON GROWTH ADVISORS II,LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES,LLC. AND THE CCO OF KAYNE ANDERSON GROWTH ADVISORS II,LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991)

KAMP INVESTMENT MANAGEMENT, LLC is under common control with the firm.

CRD #: 295920

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Firm Operations

Organization Affiliates (continued)

Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MGMT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KAMP INVESTMENT MGMT, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAMP INVESTMENT MGMT, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAEFTX, LP is under common control with the firm.

CRD #:	295919
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO AN OWNER AND GENERAL PARTNER OF KAEFTX, LP. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE

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Firm Operations

Organization Affiliates (continued)

CCO OF KAEFTX, LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAEFTX VIII, LLC is under common control with the firm.

CRD #:	295918
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KAEFTX VIII, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAEFTX VIII, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAEFTX VII, LLC is under common control with the firm.

CRD #:	295917
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES,

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Firm Operations

Organization Affiliates (continued)

LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO AN OWNER AND MANAGING MEMBER OF KAEFTX VII, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAEFTX VII, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAEFTX VI, LLC is under common control with the firm.

CRD #: 295916

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO AN OWNER AND MANAGING MEMBER OF KAEFTX VI, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAEFTX VI, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAEFTX V, LLC is under common control with the firm.

CRD #: 295915

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

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Firm Operations

Organization Affiliates (continued)

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO AN OWNER AND MANAGING MEMBER OF KAEFTX V, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAEFTX V, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KAEFTX IV, LLC is under common control with the firm.

CRD #: 295911

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

Effective Date: 12/01/2021

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO AN OWNER AND MANAGING MEMBER OF KAEFTX IV, LLC. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KAEFTX IV, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KA PRIVATE ADVISORS, LP is under common control with the firm.

CRD #: 295562

Business Address: 717 TEXAS AVENUE
22ND FLOOR
HOUSTON, TX 77002

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Firm Operations

Organization Affiliates (continued)

Effective Date:	12/01/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND GENERAL PARTNER OF KA PRIVATE ADVISORS, LP. MICHAEL O'NEIL IS THE PRESIDENT OF KA ASSOCIATES, LLC. AND THE CCO OF KA PRIVATE ADVISORS, LP. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KA CREDIT ADVISORS II, LLC is under common control with the firm.

CRD #:	311657
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	01/12/2021
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KA CREDIT ADVISORS II, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KA CREDIT ADVISORS, LLC is under common control with the firm.

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Firm Operations

Organization Affiliates (continued)

CRD #:	306753
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	10/06/2020
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P. (KACALP), WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KA CREDIT ADVISORS, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

KA FUND ADVISORS, LLC is under common control with the firm.

CRD #:	141037
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	08/23/2006
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC., THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC., THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P., WHO IS ALSO THE MAJORITY OWNER AND MANAGING MEMBER OF KA FUND ADVISORS, LLC. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

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Firm Operations

Organization Affiliates (continued)

KAYNE ANDERSON CAPITAL ADVISORS LP is under common control with the firm.

CRD #:	104536
Business Address:	717 TEXAS AVENUE 22ND FLOOR HOUSTON, TX 77002
Effective Date:	06/29/1994
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	RICHARD A. KAYNE IS THE MAJORITY SHAREHOLDER OF KA ASSOCIATES, LLC. AND THE MAJORITY SHAREHOLDER OF KA HOLDINGS, INC. THE HOLDING COMPANY FOR KAYNE ANDERSON INVESTMENT MANAGEMENT, INC. THE GENERAL PARTNER OF KAYNE ANDERSON CAPITAL ADVISORS, L.P. THE ENTITY IS A RELYING ADVISER OF KAYNE ANDERSON CAPITAL ADVISORS, LP (SEC#:801-46991).

This firm is not directly or indirectly, controlled by the following:

- **bank holding company**
- **national bank**
- **state member bank of the Federal Reserve System**
- **state non-member bank**
- **savings bank or association**
- **credit union**
- **or foreign bank**

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Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	1	0

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Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
   - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
   - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
   - A disclosure event may have a status of *pending, on appeal,* or *final.*
     - A "pending" event involves allegations that have not been proven or formally adjudicated.
     - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
     - A "final" event has been concluded and its resolution is not subject to change.
   - A final event generally has a disposition of *adjudicated, settled* or *otherwise resolved.*
     - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
     - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
     - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Regulator
Current Status:	Final

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Allegations:	KA ASSOCIATES, INC. (KAA) INFORMED THE DEPARTMENT THAT IT HAD UNKNOWINGLY EFFECTED A SMALL NUMBER OF SECURITIES-RELATED TRANSACTIONS ON BEHALF OF A SINGLE CUSTOMER WHO WAS A RESIDENT OF THE DISTRICT OF COLUMBIA, WHILE NOT PROPERLY LICENSED UNDER THE DISTRICT OF COLUMBIA SECURITIES ACT OF 2000. THE FIRM REPORTED THAT UNLICENSED ACTIVITY WAS THE RESULT OF THE CUSTOMER ESTABLISHING LEGAL RESIDENCY IN THE DISTRICT OF COLUMBIA UNBEKNOWNST TO KAA.
Initiated By:	DISTRICT OF COLUMBIA
Date Initiated:	03/03/2014
Docket/Case Number:	SB-CO-14-13
URL for Regulatory Action:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	ADMINISTRATIVE CONSENT AGREEMENT AND ORDER
Resolution:	Settled
Resolution Date:	03/12/2014
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Monetary/Fine $4,000.00
Other Sanctions Ordered:	KAA AND THE DEPARTMENT REACHED A MUTUAL AGREEMENT WHEREBY KAA, WITHOUT ADMITTING OR DENYING WRONGDOING, AGREED TO PAY TO THE DEPARTMENT $4,000 TO COVER FEES, INTEREST THEREON AND ESTIMATED EXPENSES OF THE DEPARTMENT'S INVESTIGATION. THE PAYMENT WAS MADE IN FULL ON MARCH 13, 2014.
Sanction Details:	N/A

Reporting Source:	Firm
Current Status:	Final

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Allegations:	KA ASSOCIATES, INC. (KAA) INFORMED THE DEPARTMENT THAT IT HAD UNKNOWINGLY EFFECTED A SMALL NUMBER OF SECURITIES-RELATED TRANSACTIONS ON BEHALF OF A SINGLE CUSTOMER WHO WAS A RESIDENT OF THE DISTRICT OF COLUMBIA, WHILE NOT PROPERLY LICENSED UNDER THE DISTRICT OF COLUMBIA SECURITIES ACT OF 2000. THE FIRM REPORTED THAT UNLICENSED ACTIVITY WAS THE RESULT OF THE CUSTOMER ESTABLISHING LEGAL RESIDENCY IN THE DISTRICT OF COLUMBIA UNBEKNOWNST TO KAA.
Initiated By:	DISTRICT OF COLUMBIA DEPARTMENT OF INSURANCE, SECURITIES, AND BANKING
Date Initiated:	03/03/2014
Docket/Case Number:	SB-CO-14-13
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	ADMINISTRATIVE CONSENT AGREEMENT AND ORDER
Resolution:	Settled
Resolution Date:	03/12/2014
Sanctions Ordered:	Monetary/Fine $4,000.00
Other Sanctions Ordered:	KAA AND THE DEPARTMENT REACHED A MUTUAL AGREEMENT WHEREBY KAA, WITHOUT ADMITTING OR DENYING WRONGDOING, AGREED TO PAY TO THE DEPARTMENT $4,000 TO COVER FEES, INTEREST THEREON AND ESTIMATED EXPENSES OF THE DEPARTMENT'S INVESTIGATION. THE PAYMENT WAS MADE IN FULL ON MARCH 13, 2014.
Sanction Details:	N/A

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End of Report

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