



## IAPD Report

# DENNIS ROBIN WALKER

CRD# 1058338

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Please contact FINRA with any concerns.



## IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

### What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD 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 representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

### Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

### How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

### Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

### What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

### Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



## Report Summary

### DENNIS ROBIN WALKER (CRD# 1058338)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **02/19/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	WALKER ASSET MANAGEMENT, LLC	CRD# 284951	10/24/2016

### QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **3** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

**Note:** Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

### REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	SIGNALPOINT ASSET MANAGEMENT LLC	147578	SPRINGFIELD, MO	08/09/2013 - 02/17/2017
IA	SIGNALPOINT CAPITAL MANAGEMENT, LLC	164818	SPRINGFIELD, MO	02/25/2014 - 09/13/2016
B	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC	11025	SPRINGFIELD, MO	03/02/2007 - 08/21/2013

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

### DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

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

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	2
Termination	1



## Qualifications

### REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **3** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

#### Employment 1 of 1

Firm Name: **WALKER ASSET MANAGEMENT, LLC**  
Main Address: VERONA, MO  
Firm ID#: 284951

	Regulator	Registration	Status	Date
IA	Arkansas	Investment Adviser Representative	Approved	03/26/2025
IA	Missouri	Investment Adviser Representative	Approved	10/24/2016
IA	Texas	Investment Adviser Representative	Restricted Approval	02/06/2017

#### Branch Office Locations

**WALKER ASSET MANAGEMENT, LLC**  
VERONA, MO





## Qualifications

### PASSED INDUSTRY EXAMS


This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

**This individual has passed 2 principal/supervisory exams, 1 general industry/product exam, and 2 state securities law exams.**



#### Principal/Supervisory Exams

Exam	Category	Date
 General Securities Sales Supervisor - General Module Examination (S10)	Series 10	04/19/2001
 General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	04/10/2001

#### General Industry/Product Exams

Exam	Category	Date
 General Securities Representative Examination (S7)	Series 7	09/18/1982

#### State Securities Law Exams

Exam	Category	Date
 Uniform Investment Adviser Law Examination (S65)	Series 65	08/13/1993
 Uniform Securities Agent State Law Examination (S63)	Series 63	11/10/1982

### PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



## Registration & Employment History

### PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	08/09/2013 - 02/17/2017	SIGNALPOINT ASSET MANAGEMENT LLC	CRD# 147578	SPRINGFIELD, MO
IA	02/25/2014 - 09/13/2016	SIGNALPOINT CAPITAL MANAGEMENT, LLC	CRD# 164818	SPRINGFIELD, MO
B	03/02/2007 - 08/21/2013	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC	CRD# 11025	SPRINGFIELD, MO
IA	03/02/2007 - 08/21/2013	WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC	CRD# 11025	SPRINGFIELD, MO
IA	02/27/2001 - 03/05/2007	MORGAN STANLEY	CRD# 7556	OVERLAND PARK, KS
B	02/26/2001 - 03/05/2007	MORGAN STANLEY DW INC.	CRD# 7556	OVERLAND PARK, KS
B	09/24/1982 - 03/09/2001	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY

### EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
08/2016 - Present	Walker Asset Management, LLC	Manager Member	Y	Verona, MO, United States
07/2013 - 02/2017	SIGNALPOINT ASSET MANAGEMENT LLC	INVESTMENT ADVISER	Y	SPRINGFIELD, MO, United States

### OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

No information reported.



## Disclosure Summary

### Disclosure Information

#### What you should know about reported disclosure events:

##### (1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

##### (2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

##### (3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
  - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
  - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
  - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure 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 represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
  - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

##### (4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



## DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	2
Termination	1

### Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 2

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	FINRA
<b>Sanction(s) Sought:</b>	Other: N/A
<b>Date Initiated:</b>	02/25/2015
<b>Docket/Case Number:</b>	<a href="#">2013038066601</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	WACHOVIA SECURITIES FINANCIAL NETWORK, LLC; WELLS FARGO ADVISORS FINANCIAL NETWORK, INC.
<b>Product Type:</b>	Investment Contract

**Allegations:** WITHOUT ADMITTING OR DENYING THE FINDINGS, WALKER CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT HE AND TWO OTHER RESPONDENTS ENGAGED IN AN OUTSIDE BUSINESS ACTIVITY WITH A REGISTERED INVESTMENT ADVISOR AND DID NOT ADEQUATELY DISCLOSE THEIR INVOLVEMENT IN THE INVESTMENT ADVISOR TO THEIR MEMBER FIRM. DESPITE THE FIRM'S AWARENESS OF THE RESPONDENTS' DESIRE TO OBTAIN AN OWNERSHIP INTEREST IN THE INVESTMENT ADVISOR, THE FIRM WAS NOT NOTIFIED OF THE RESPONDENTS' ACTIVE PARTICIPATION IN THE ESTABLISHMENT, MANAGEMENT AND CONTROL OF THE INVESTMENT ADVISOR. WALKER AND THE OTHER RESPONDENTS FORMED AND REGISTERED THE REGISTERED INVESTMENT ADVISOR WITH THREE NOMINEE OWNERS ACTING IN THEIR STEAD AS MAJORITY MEMBERS OF THE INVESTMENT ADVISOR, WHICH EACH NOMINEE ACQUIRING A 26.67 PERCENT OWNERSHIP STAKE IN THE INVESTMENT ADVISOR. THE NOMINEES AGREED TO TRANSFER THEIR OWNERSHIP INTERESTS TO RESPONDENTS IF AND WHEN THE FIRM PERMITTED



RESPONDENTS TO OWN THE INVESTMENT ADVISOR. THE FIRM HAD REPEATEDLY DENIED RESPONDENTS' REQUESTS TO OWN AND OPERATE THE INVESTMENT ADVISOR. THE NOMINEES DID NOT PROVIDE ANY INVESTMENT OR ANY SERVICES IN EXCHANGE FOR THEIR OWNERSHIP INTERESTS. THE NOMINEES NEVER PARTICIPATED IN THE INVESTMENT ADVISOR'S MANAGEMENT OR DAY-TO-DAY OPERATIONS. WALKER PROVIDED APPROXIMATELY \$170,000 TO FUND THE INVESTMENT ADVISOR'S BUSINESS. THE FINDINGS STATED THAT WALKER AND THE OTHER RESPONDENTS PARTICIPATED IN PRIVATE SECURITIES TRANSACTIONS AND DID NOT DISCLOSE THEIR PARTICIPATION TO THEIR FIRM. SPECIFICALLY, THE RESPONDENTS SOUGHT TO RECOUP SOME OF THEIR INVESTMENT IN THE INVESTMENT ADVISOR AND ARRANGED FOR A THIRD PARTY INVESTOR TO ACQUIRE AN INTEREST IN THE INVESTMENT ADVISOR. THE RESPONDENTS DIRECTED EACH NOMINEE OWNER TO GIVE 1.67 PERCENT OF THE OWNERSHIP INTEREST IN THE INVESTMENT ADVISOR TO THE SPOUSE OF ONE RESPONDENT (SO THAT EACH OF THE THREE SPOUSES HELD 1.67 PERCENT). ON THE SAME DAY, THE SPOUSES' SHARES WERE SOLD TO THE INVESTOR FOR A TOTAL OF \$225,000. ONCE MORE, THE RESPONDENTS STRUCTURED A SIMILAR ARRANGEMENT WITH ANOTHER INVESTOR WHO PAID APPROXIMATELY \$180,000 FOR A 5 PERCENT INTEREST IN THE INVESTMENT ADVISOR, AGAIN CONVEYED THROUGH THE RESPONDENTS' SPOUSES. THE NOMINEES DID NOT RECEIVE ANY COMPENSATION FOR THE INTERESTS THEY SURRENDERED. THE FINDINGS ALSO STATED THAT WALKER AND THE OTHER RESPONDENTS FAILED TO ACCURATELY COMPLETE ANNUAL COMPLIANCE QUESTIONNAIRES, BY CLAIMING NOT TO HAVE ANY UNDISCLOSED ACTIVITIES ON THEIR COMPLIANCE QUESTIONNAIRES, AND INACCURATELY DESCRIBED THOSE ACTIVITIES ON THEIR OUTSIDE ACTIVITY DISCLOSURE FORMS.

<b>Current Status:</b>	Final
<b>Resolution:</b>	Acceptance, Waiver & Consent(AWC)
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	02/25/2015
<b>Sanctions Ordered:</b>	Civil and Administrative Penalty(ies)/Fine(s) Suspension
<b>If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?</b>	No



**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**

**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	ANY CAPACITY
<b>Duration:</b>	18 MONTHS
<b>Start Date:</b>	03/02/2015



**End Date:** 09/01/2016

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)

**Total Amount:** \$20,000.00

**Portion Levied against individual:** \$20,000.00

**Payment Plan:** DEFERRED

**Is Payment Plan Current:**

**Date Paid by individual:**

**Was any portion of penalty waived?** No

**Amount Waived:**

.....

**Reporting Source:** Individual

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**Date Initiated:** 02/25/2015

**Docket/Case Number:** [2013038066601](#)

**Employing firm when activity occurred which led to the regulatory action:** WELLS FARGO FINET

**Product Type:** No Product

**Allegations:** FINRA ALLEGED THAT MR. WALKER ENGAGED IN ACTIVITY THAT WAS NOT IN COMPLIANCE WITH NASD RULES 3030 AND 2110 OR FINRA RULES 3270, 2010 AND 3040.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Resolution Date:** 02/25/2015

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** ALL CAPACITIES



**Duration:** 18 MONTHS

**Start Date:** 03/02/2015

**End Date:** 09/01/2016

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)

**Total Amount:** \$20,000.00

**Portion Levied against individual:** \$20,000.00

**Payment Plan:** DEFERRED

**Is Payment Plan Current:**

**Date Paid by individual:**

**Was any portion of penalty waived?** No

**Amount Waived:**

**Broker Statement**

EXCEPT FOR THE AWC AND AN EARLIER SEC CONSENT ORDER, MR. WALKER HAS NOT BEEN THE SUBJECT OF ANY OTHER DISCIPLINARY ACTION DURING HIS 30 YEAR CAREER IN THE SECURITIES INDUSTRY. NEITHER THE AWC NOR THE SEC CONSENT ORDER, WHICH BOTH AROSE FROM THE SAME FACTS SURROUNDING THE ESTABLISHMENT AND OWNERSHIP OF AN INVESTMENT ADVISORY FIRM, SIGNALPOINT ASSET MANAGEMENT ("SIGNALPOINT"), CONTAIN ANY FINDING OF CUSTOMER LOSSES OR COMPLAINTS. MOREOVER, AS NOTED IN THE AWC, MR. WALKER'S FORMER SECURITIES BROKERAGE FIRM WAS, AT ALL TIMES, FULLY AWARE OF HIS INTEREST IN OWNING SIGNALPOINT. SIGNALPOINT, CONTINUES TO OPERATE AS A SEC REGISTERED INVESTMENT ADVISER. LIKEWISE, MR. WALKER REMAINS REGISTERED AS AN INVESTMENT ADVISER WITH ALL APPLICABLE FEDERAL/STATE AGENCIES.

**Disclosure 2 of 2**

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** UNITED STATES SECURITIES AND EXCHANGE COMMISSION

**Sanction(s) Sought:** Cease and Desist  
Censure  
Civil and Administrative Penalty(ies)/Fine(s)

**Date Initiated:** 07/02/2014

**Docket/Case Number:** 3-15955

**Employing firm when activity occurred which led to the regulatory action:** WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC; SIGNALPOINT CAPITAL MANAGEMENT, LLC; SIGNALPOINT ASSET MANAGEMENT LLC

**Product Type:** Other: UNSPECIFIED SECURITIES

**Allegations:** SEC ADMINISTRATIVE RELEASE 34-72515; IA RELEASE 40-3868, JULY 2, 2014: THE SEC DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST THAT PUBLIC ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS BE, AND HEREBY ARE, INSTITUTED PURSUANT TO SECTION 15(B) OF THE



SECURITIES EXCHANGE ACT OF 1934 AND SECTIONS 203(E), 203(F) AND 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940 AGAINST A FIRM, ITS PRINCIPAL DENNIS R. WALKER, TWO OTHER PRINCIPALS, AND THE FIRM'S CCO. IN ANTICIPATION OF THE INSTITUTION OF THESE PROCEEDINGS, RESPONDENTS HAVE SUBMITTED OFFERS OF SETTLEMENT WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. SOLELY FOR THE PURPOSE OF THESE PROCEEDINGS AND ANY OTHER PROCEEDINGS BROUGHT BY OR ON BEHALF OF THE COMMISSION, OR TO WHICH THE COMMISSION IS A PARTY, AND WITHOUT ADMITTING OR DENYING THE FINDINGS HEREIN, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER THEM AND THE SUBJECT MATTER OF THESE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENTS CONSENT TO THE ENTRY OF THIS ORDER INSTITUTING ADMINISTRATIVE AND CEASE-AND-DESIST PROCEEDINGS, PURSUANT TO SECTION 15(B) OF THE SECURITIES EXCHANGE ACT OF 1934 AND SECTIONS 203(E), 203(F) AND 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940, MAKING FINDINGS, AND IMPOSING REMEDIAL SANCTIONS AND A CEASE-AND-DESIST ORDER. THE COMMISSION FOUND THAT WHEN ADVISING THEIR ADVISORY CLIENTS TO INVEST WITH THE FIRM, THE PRINCIPALS BREACHED THEIR FIDUCIARY DUTY BY FAILING TO DISCLOSE ALL MATERIAL FACTS CONCERNING THE EXTENT OF THEIR ABILITY TO DIRECT THE FIRM'S MANAGEMENT AND POLICIES. THE PRINCIPALS ALSO BREACHED THEIR FIDUCIARY DUTY BY FAILING TO DISCLOSE THEIR EXISTING AND POTENTIAL CONFLICTS OF INTEREST WHEN ADVISING CLIENTS TO INVEST WITH THE FIRM. IN PARTICULAR, THEY FAILED TO DISCLOSE TO CLIENTS THAT THEY HAD LOANED SUBSTANTIAL AMOUNTS OF MONEY TO THE FIRM AND THEREFORE STOOD TO INDIRECTLY BENEFIT FROM CLIENTS' PAYMENT OF ADVISORY FEES TO THE FIRM. THE PRINCIPALS ALSO FAILED TO DISCLOSE THAT THEY WERE CONTINUING TO SEEK APPROVAL FROM THE DUALY-REGISTERED BROKER-DEALER AND INVESTMENT ADVISER THEY WERE EMPLOYED BY TO OBTAIN OWNERSHIP INTERESTS IN THE FIRM, WHICH, IF OBTAINED, WOULD ENTITLE THEM TO SHARE IN ANY PROFITS THAT WERE DERIVED FROM CLIENTS' PAYMENTS OF ADVISORY FEES TO IT. AS A RESULT OF THE CONDUCT DESCRIBED ABOVE, THE FIRM, WALKER, AND THE OTHER PRINCIPALS WILLFULLY VIOLATED SECTION 206(2) OF THE ADVISERS ACT. IN ADDITION, WALKER'S FIRM AND ITS CCO WILLFULLY VIOLATED SECTION 207 OF THE ADVISERS ACT.

**Current Status:**

Final

**Resolution:**

Order

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?**

No

**Resolution Date:**

07/02/2014

**Sanctions Ordered:**

Cease and Desist

Censure

Civil and Administrative Penalty(ies)/Fine(s)

Other: THE PRINCIPALS HAVE UNDERTAKEN TO, WITHIN THIRTY DAYS OF THE ENTRY OF THE ORDER, PROVIDE A COPY OF THIS ORDER TO EACH OF THEIR ADVISORY CLIENTS WHO INVESTED WITH THE FIRM ANY TIME BETWEEN OCTOBER 2009 AND THE DATE OF THIS ORDER.

IT IS ORDERED THAT WALKER CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATIONS OF SECTION



206(2) OF THE ADVISERS ACT.

ALSO, THE RESPONDENT WILLFULLY VIOLATED SECTION 206(2) OF THE ADVISERS ACT.

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?**

Yes

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**

Yes

**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

No



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

No

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$60,000.00

Portion Levied against individual: \$60,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:

Reporting Source: Individual

Regulatory Action Initiated By: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Cease and Desist  
Censure  
Civil and Administrative Penalty(ies)/Fine(s)

Date Initiated: 07/02/2014

Docket/Case Number: 3-15955

Employing firm when activity occurred which led to the regulatory action: WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC

Product Type: No Product

Allegations: MR. WALKER FAILED TO DISCLOSE HIS CONTROL OF, AND PARTICIPATION IN, SIGNALPOINT ASSET MANAGEMENT, LLC AND THE RELATED CONFLICTS OF INTEREST.

Current Status: Final



<b>Resolution:</b>	Order
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	07/02/2014
<b>Sanctions Ordered:</b>	Cease and Desist Censure Civil and Administrative Penalty(ies)/Fine(s)
<b>Monetary Sanction 1 of 1</b>	
<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$60,000.00
<b>Portion Levied against individual:</b>	\$60,000.00
<b>Payment Plan:</b>	\$60,000.00 WAS PAID ON 7/11/2014
<b>Is Payment Plan Current:</b>	Yes
<b>Date Paid by individual:</b>	07/11/2014
<b>Was any portion of penalty waived?</b>	No
<b>Amount Waived:</b>	



## Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

### Disclosure 1 of 1

**Reporting Source:** Firm  
**Firm Name:** WELLS FARGO ADVISORS FINANCIAL NETWORK, LLC.  
**Termination Type:** Discharged  
**Termination Date:** 07/26/2013  
**Allegations:** FAILURE TO DISCLOSE THE NATURE AND EXTENT OF HIS RELATIONSHIP WITH SIGNAL POINT ASSET MANAGEMENT, LLC  
**Product Type:** No Product

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**Reporting Source:** Individual  
**Firm Name:** WELLS FARGO ADVISORS FINANCIAL NETWORK LLC  
**Termination Type:** Discharged  
**Termination Date:** 07/26/2013  
**Allegations:** FAILURE TO DISCLOSE THE NATURE AND EXTENT OF HIS RELATIONSHIP WITH SIGNALPOINT ASSET MANAGEMENT, LLC.  
**Product Type:** No Product



## End of Report

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