



IAPD Report

DANIEL WU

CRD# 2651056

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

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

DANIEL WU (CRD# 2651056)

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 **12/15/2025**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	PAIR LENDING LLC	CRD# 281987	01/15/2016
IA	PAIR CAPITAL WEALTH MANAGEMENT, LLC	CRD# 284683	02/08/2018
IA	STRAIT & SOUND	CRD# 309306	05/03/2022

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	GPS CAPITAL MANAGEMENT, LLC	136330	BURLINGAME, CA	02/25/2019 - 12/14/2022
IA	PG GLOBAL WEALTH MANAGEMENT, INC.	158927	BELLEVUE, WA	11/18/2016 - 10/11/2022
IA	GPS CAPITAL MANAGEMENT, LLC	136330	San Ramon, CA	09/12/2005 - 12/31/2018

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	1
Customer Dispute	7



Report Summary



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 3

Firm Name: **STRAIT & SOUND**
Main Address: SAN FRANCISCO, CA
Firm ID#: 309306

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	05/03/2022
IA Washington	Investment Adviser Representative	Approved	01/17/2023

Branch Office Locations

STRAIT & SOUND
840 Hinckly Road
Suite 246
Burlingame, CA 94010

Employment 2 of 3

Firm Name: **PAIR CAPITAL WEALTH MANAGEMENT, LLC**
Main Address: 2844 ULLOA STREET
SAN FRANCISCO, CA 94116
Firm ID#: 284683

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	02/08/2018

Branch Office Locations

PAIR CAPITAL WEALTH MANAGEMENT, LLC
611 Gateway Blvd
Suite 120
South San Francisco, CA 94080

Employment 3 of 3

Firm Name: **PAIR LENDING LLC**
Main Address: 505 MONTGOMERY STREET, 10TH FLOOR



Qualifications

SAN FRANCISCO, CA 94111

Firm ID#: 281987

Regulator	Registration	Status	Date
IA California	Investment Adviser Representative	Approved	02/26/2016
IA Texas	Investment Adviser Representative	Restricted Approval	01/15/2016
IA Washington	Investment Adviser Representative	Approved	03/09/2016

Branch Office Locations

PAIR LENDING LLC

505 Montgomery Street, 10th Floor
San Francisco, CA 94116



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, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

Exam	Category	Date
 General Securities Sales Supervisor - General Module Examination (S10)	Series 10	03/20/2001
 General Securities Sales Supervisor - Options Module Examination (S9)	Series 9	09/28/1999

General Industry/Product Exams

Exam	Category	Date
 National Commodity Futures Examination (S3)	Series 3	03/21/2018
 General Securities Representative Examination (S7)	Series 7	10/23/1995

State Securities Law Exams

Exam	Category	Date
  Uniform Combined State Law Examination (S66)	Series 66	07/20/2005
 Uniform Securities Agent State Law Examination (S63)	Series 63	11/15/1995

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	02/25/2019 - 12/14/2022	GPS CAPITAL MANAGEMENT, LLC	CRD# 136330	BURLINGAME, CA
IA	11/18/2016 - 10/11/2022	PG GLOBAL WEALTH MANAGEMENT, INC.	CRD# 158927	BELLEVUE, WA
IA	09/12/2005 - 12/31/2018	GPS CAPITAL MANAGEMENT, LLC	CRD# 136330	San Ramon, CA
IA	09/23/2016 - 12/31/2017	PAIR CAPITAL WEALTH MANAGEMENT, LLC	CRD# 284683	SAN BRUNO, CA
IA	07/08/2016 - 10/16/2017	ONVEST LLC	CRD# 281910	SAN FRANCISCO, CA
B	11/09/1995 - 08/30/2005	CHARLES SCHWAB & CO., INC.	CRD# 5393	WESTLAKE, TX
B	10/21/2004 - 10/22/2004	CITICORP INVESTMENT SERVICES	CRD# 23988	LONG ISLAND CITY, 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
04/2022 - Present	Strait & Sound	Investment Adviser Representative	Y	San Francisco, CA, United States
02/2018 - Present	Pair Capital Wealth Management, LLC	Owner, investment advisor representative and Chief Compliance Officer	Y	South San Francisco, CA, United States
01/2016 - Present	Pair Lending LLC	Owner, Investment Advisor Representative, and Chief Compliance Officer	Y	San Francisco, CA, United States
07/2015 - Present	OnVest LLC	Owner	N	San Francisco, CA, United States
10/2005 - 12/2022	GPS CAPITAL MANAGEMENT, LLC	MANAGING MEMBER, CIO, CCO	Y	SAN RAMON, CA, United States
11/2017 - 12/2021	Global Investment Science, LLC	CEO - firm became a CTA in 12/2019	Y	San Mateo, CA, United States



Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
11/2016 - 12/2021	PG Global Wealth Management, Inc.	OWNER, PORTFOLIO MANAGER, AND CCO	Y	Bellevue, WA, 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.

OnVest LLC 505 Montgomery Street, 11th Floor San Francisco, CA 94401. I am the Founder and CEO of Onvest, starting on July 2015. Onvest LLC is a software company to collect and develop analytics for the financial markets. I spend about 15 hours per week at Onvest.



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	1
Customer Dispute	7

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 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	California
Sanction(s) Sought:	Cease and Desist Civil and Administrative Penalty(ies)/Fine(s)
Date Initiated:	07/24/2024
Docket/Case Number:	38520
URL for Regulatory Action:	https://dfpi.ca.gov/enforcement_action/chen-dennis-wu-daniel-gps-capital-management-llc/
Employing firm when activity occurred which led to the regulatory action:	GPS Capital Management, LLC
Product Type:	No Product
Allegations:	The Commissioner alleges GPS and Wu provided substantial assistance, within the meaning of Corporations Code section 25403(b), by providing a third party access to GPS' advisory platform at TD Ameritrade, Inc, whereby Chen engaged in the business of effecting transactions in securities. In connection with the investment advisory services provided, GPS and Wu omitted statements of material fact to approximately 50 GPS' clients, including providing a third-party, access to their accounts and personal identifiable information (PII). From May 27, 2020, through October 15, 2021, GPS and Wu provided substantial assistance, within the meaning of section 25403(b), by providing Chen access to GPS' advisory platform at TD Ameritrade, Inc, whereby Chen engaged in a cherry-picking fraudulent scheme.
Current Status:	Final



Resolution:	Settled
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	12/16/2024
Sanctions Ordered:	Cease and Desist Civil and Administrative Penalty(ies)/Fine(s)
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$35,000.00
Portion Levied against individual:	\$35,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	12/19/2024
Was any portion of penalty waived?	No
Amount Waived:
<hr/>	
Reporting Source:	Individual
Regulatory Action Initiated By:	California Department of Financial Protection & Innovation
Sanction(s) Sought:	Cease and Desist Monetary Penalty other than Fines
Date Initiated:	07/24/2024
Docket/Case Number:	38520
Employing firm when activity occurred which led to the regulatory action:	GPS Capital Management, LLC
Product Type:	No Product
Allegations:	The Commissioner alleges GPS and WU provided substantial assistance, within the meaning of Corporations Code section 25403(b), by providing a third party access to GPS' advisory platform at TD Ameritrade, Inc., whereby Chen engaged in the business of effecting transactions in securities, in connection with the investment advisory services provided, GPS and Wu omitted statements of material fact to approximately 50 GPS' clients, including providing a third-party, access to their accounts and personal identifiable information. From May 27, 2020, through October 15, 2021, GPS and Wu provided substantial assistance, within the meaning of section 25403(b), by providing Chen access to GPS' advisory platform at TD Ameritrade, Inc, whereby Chen engaged in a cherrypicking fraudulent scheme.



Current Status:	Final
Resolution:	Settled
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	12/16/2024
Sanctions Ordered:	Cease and Desist Monetary Penalty other than Fines
Monetary Sanction 1 of 1	
Monetary Related Sanction:	Civil and Administrative Penalty(ies)/Fine(s)
Total Amount:	\$35,000.00
Portion Levied against individual:	\$35,000.00
Payment Plan:	
Is Payment Plan Current:	
Date Paid by individual:	12/19/2024
Was any portion of penalty waived?	No
Amount Waived:	
Broker Statement	The settlement was levied against Mr. Wu, Dennis Chen, and GPS Capital Management, LLC. Mr. Chen paid \$35,000 to settle on their behalf.



Customer Dispute

This section provides information regarding a customer dispute that was reported to the Investment Adviser Registration Depository (IARD) by the Investment Adviser Representative (IAR), an investment adviser and/or securities firm, and/or a securities regulator. The event may include a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit that contains allegations of sales practice violations against the individual.

The customer dispute may be pending or may have resulted in a civil judgment, arbitration award, monetary settlement, closure without action, withdrawal, dismissal, denial, or other outcome.

Disclosure 1 of 7

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	GPS Capital Management, LLC
Allegations:	GPS failed to train its employee, Jennifer Ling as an investment advisor, misrepresentation on investment disclosure, breach of fiduciary duty, and negligence.
Product Type:	Direct Investment-DPP & LP Interests
Alleged Damages:	\$150,000.00
Alleged Damages Amount Explanation (if amount not exact):	Mr. Mosley alleged damages ranging from \$100,000 to \$200,000.

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	American Arbitration Association
Docket/Case #:	01-21-0018-1263
Date Notice/Process Served:	12/23/2021
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	01/12/2023
Monetary Compensation Amount:	\$35,000.00
Individual Contribution Amount:	\$0.00
Broker Statement	In consideration of the legal costs associated with the suit, both parties decided to settle. The claimant had received few distributions from the investment and will continue to hold the investment and bear the risks.

Disclosure 2 of 7

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	GPS Capital Management, LLC
Allegations:	Customer alleges breach of fiduciary duty and violations of FINRA Rules and California law relating to purchases of private placements in 2014 and 2015.



Product Type:	Other: private placements
Alleged Damages:	\$100,000.00
Alleged Damages Amount Explanation (if amount not exact):	Complaint alleges damages in a range from \$100K to \$500k.

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):

Docket/Case #: 20-00333

Date Notice/Process Served: 02/12/2020

Arbitration Pending? No

Disposition: Settled

Disposition Date: 11/17/2020

Monetary Compensation Amount: \$100,000.00

Individual Contribution Amount: \$0.00

Broker Statement In consideration of the legal costs associated to the suit, both parties decided to settle. Eventually, GPS Capital assisted the client to recover 100% of the loss.

Disclosure 3 of 7

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: GPS Capital Management LLC

Allegations: Customers allege breach of fiduciary duty, violation of FINRA rules and California law, and constructive fraud relating to a promissory note investment issued by Aequitas Commercial Finance LLC in December 2013.

Product Type: Promissory Note

Alleged Damages: \$1,000,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA Office of Dispute Resolution

Docket/Case #: 19-01823

Date Notice/Process Served: 07/24/2019

Arbitration Pending? No

Disposition: Settled

Disposition Date: 12/18/2019

Monetary Compensation Amount: \$46,500.00



Individual Contribution Amount:	\$0.00
Broker Statement	In consideration of the legal costs associated to the suit, both parties decided to settle. Eventually, GPS Capital assisted the client to recover 100% of the loss.

Disclosure 4 of 7

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	GPS Capital Management LLC
Allegations:	Customer alleges breach of fiduciary duty, constructive fraud, and violation of the California corporations code relating to a promissory note investment issued by Aequitas Commercial Finance LLC in October 2014.
Product Type:	Promissory Note
Alleged Damages:	\$100,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	FINRA
Docket/Case #:	Case No. 18-02652
Date Notice/Process Served:	09/04/2018
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	11/07/2019
Monetary Compensation Amount:	\$10,000.00
Individual Contribution Amount:	\$0.00

Disclosure 5 of 7

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	GPS Capital Management LLC
Allegations:	Customer alleges breach of fiduciary duty, violations of California law, breach of contract and negligence relating to a promissory note investments issued by Aequitas Commercial Finance LLC in or about July 2014 and July 2015.
Product Type:	Promissory Note
Alleged Damages:	\$600,000.00
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	No



Customer Complaint Information

Date Complaint Received: 07/05/2018

Complaint Pending? No

Status: Settled

Status Date: 07/07/2022

Settlement Amount: \$100,000.00

Individual Contribution Amount: \$0.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA

Docket/Case #: 18-02453

Date Notice/Process Served: 08/22/2018

Arbitration Pending? No

Disposition: Settled

Disposition Date: 07/07/2022

Monetary Compensation Amount: \$100,000.00

Individual Contribution Amount: \$0.00

Broker Statement In consideration of the legal costs associated with the suit, both parties decided to settle. The client has recovered a majority of the loss principal from this investment from a class action.

Disclosure 6 of 7

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: GPS Capital Management, LLC

Allegations: Customer alleges violation of the investment advisers act, violation of the state corporations code, and breach of fiduciary relating to promissory note investment issued by Aequitas Commercial Finance, LLC made in January 2015.

Product Type: Promissory Note

Alleged Damages: \$223,408.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.): FINRA Office of Dispute Resolution

Docket/Case #: 16-02647

Date Notice/Process Served: 11/10/2016

Arbitration Pending? No



Disposition:	Settled
Disposition Date:	12/01/2017
Monetary Compensation Amount:	\$85,000.00
Individual Contribution Amount:	\$0.00
Broker Statement	In consideration of the legal costs associated to the suit, both parties decided to settle. Eventually, GPS Capital assisted the client to recover 100% of the loss.

Disclosure 7 of 7

Reporting Source:	Individual
Employing firm when activities occurred which led to the complaint:	GPS Capital Management, LLC
Allegations:	Customers allege professional negligence, negligent supervision and fraud and negligent misrepresentation relating to promissory note investments issued by Aequitas Commercial Finance, LLC made in July 2013 and December 2013.
Product Type:	Promissory Note
Alleged Damages:	\$537,000.00

Arbitration Information

Arbitration/CFTC reparation claim filed with (FINRA, AAA, CFTC, etc.):	JAMS
Docket/Case #:	1100084734
Date Notice/Process Served:	06/09/2016
Arbitration Pending?	No
Disposition:	Settled
Disposition Date:	04/21/2017
Monetary Compensation Amount:	\$134,250.00
Individual Contribution Amount:	\$0.00
Broker Statement	In consideration of the legal costs associated to the suit, both parties decided to settle. Eventually, GPS Capital assisted the client to recover 100% of the loss.



End of Report

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