



IAPD Report

DAVID MATTHEW CLAYMAN

CRD# 2892042

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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

DAVID MATTHEW CLAYMAN (CRD# 2892042)

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 **11/20/2024**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	TWELVE POINTS WEALTH MANAGEMENT	CRD# 171107	07/21/2014

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **4** 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	MORGAN STANLEY	149777	WALTHAM, MA	11/29/2010 - 06/02/2014

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
Customer Dispute	4



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 **4** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **TWELVE POINTS WEALTH MANAGEMENT**
Main Address: 9 POND LANE
SUITE 3A
CONCORD, MA 01742
Firm ID#: 171107

Regulator	Registration	Status	Date
IA Alabama	Investment Adviser Representative	Approved	11/20/2024
IA Massachusetts	Investment Adviser Representative	Approved	07/21/2014
IA New Hampshire	Investment Adviser Representative	Approved	04/04/2016
IA Texas	Investment Adviser Representative	Restricted Approval	12/11/2020

Branch Office Locations

TWELVE POINTS WEALTH MANAGEMENT
9 POND LANE
SUITE 3A
CONCORD, MA 01742



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 0 principal/supervisory exams, 0 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
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No information reported.

General Industry/Product Exams

Exam	Category	Date
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No information reported.

State Securities Law Exams

Exam	Category	Date
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IA B	Uniform Combined State Law Examination (S66)	Series 66	08/15/2000
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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	11/29/2010 - 06/02/2014	MORGAN STANLEY	CRD# 149777	WALTHAM, MA

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
01/2022 - Present	Funded & Final LLC	Member	N	Guntersville, AL, United States
06/2014 - Present	TWELVE POINTS WEALTH MANAGEMENT	WEALTH ADVISOR	Y	CONCORD, MA, 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.

1) Funded & Final LLC; Investment related: No; Location: 874 W Panorama Way Guntersville, AL; Description: Car collection of 4 friends.; Position Title: Member; Responsibilities Duties: Meeting capital calls, if any.; Start date: 2022-01-27; Hours during trading hours: 0; Hours outside trading hours: 1

2) USA 500 Clubs Inc.; Investment related: No; Location: PO Box 812578 Wellesley MA 02482 USA; Description: Minority ownership of a networking group that was first approved when Twelve Points was founded in 08/2014.; Position Title: Minority Owner; Responsibilities Duties: Annual meeting once per year; Start date: 2014-05-31; Hours per month during trading hours: 0; Hours per month outside trading hours: .2; Percentage of total yearly compensation expected to be derived from the business: .5

3) Legacy Advisors Network; Investment related: No; Location: 1116 Vista Park Drive, Suite A, Forest, VA 24551 USA; Description: Advisory firm collaboration network; Position Title: Owner; Responsibilities Duties: Help guide the organization, recruit members; Start date: 2024-02-24; Hours per month during trading hours: 1%; Hours per month outside trading hours: 1%; Percentage of total yearly compensation expected to be derived from the business: 1%



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
Customer Dispute	4

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 4

Reporting Source:	Firm
Employing firm when activities occurred which led to the complaint:	MORGAN STANLEY SMITH BARNEY
Allegations:	Allegation including time frame: Claimant alleged, inter alia, unsuitability with respect to investments from January 2011 to November 2013
Product Type:	Other: MANAGED/WRAP ACCOUNTS (IN-HOUSE MONEY MANAGER)), HEDGE FUNDS, MISCELLANEOUS
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	UNSPECIFIED
Is this an oral complaint?	No
Is this a written complaint?	Yes
Is this an arbitration/CFTC reparation or civil litigation?	Yes
Arbitration/Reparation forum or court name and location:	FINRA
Docket/Case #:	15-00774
Filing date of arbitration/CFTC reparation or civil litigation:	04/01/2015

**Customer Complaint Information**

Date Complaint Received: 07/08/2015
Complaint Pending? No
Status: Withdrawn
Status Date: 01/06/2017
Settlement Amount: \$0.00
Individual Contribution Amount: \$0.00
Firm Statement This matter was dismissed pursuant to a settlement that provided for no payment by any party or advisor. The advisor denies all allegations of wrongdoing.

Disclosure 2 of 4

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: MORGAN STANLEY SMITH BARNEY
Allegations: CLAIMANT ALLEGED, INTER ALIA, UNSUITABILITY WITH RESPECT TO INVESTMENTS - JANUARY 2011 TO NOVEMBER 2013.
Product Type: Other: MANAGED/WRAP ACCOUNTS (IN-HOUSE MONEY MANAGER)), HEDGE FUNDS, MISCELLANEOUS
Alleged Damages: \$0.00
Alleged Damages Amount Explanation (if amount not exact): UNSPECIFIED
Is this an oral complaint? No
Is this a written complaint? Yes
Is this an arbitration/CFTC reparation or civil litigation? Yes
Arbitration/Reparation forum or court name and location: FINRA
Docket/Case #: 15-00774
Filing date of arbitration/CFTC reparation or civil litigation: 04/01/2015

Customer Complaint Information

Date Complaint Received: 07/08/2015
Complaint Pending? No
Status: Withdrawn
Status Date: 01/06/2017
Settlement Amount: \$0.00
Individual Contribution Amount: \$0.00



Firm Statement This matter was dismissed pursuant to a settlement that provided for no payment by any party or advisor. The advisor denies all allegations of wrongdoing.

Disclosure 3 of 4

Reporting Source: Firm
Employing firm when activities occurred which led to the complaint: UBS FINANCIAL SERVICES INC.

Allegations: TIME FRAME: JANUARY 2, 2008 TO DECEMBER 31, 2008. CLIENT ALLEGES THAT FINANCIAL ADVISOR ASSURED HIM THAT BY "PLACING TIGHT STOPS" ON HIS ACCOUNT THAT IT WOULD NOT GO DOWN. DAMAGES ALLEGED TO BE IN THE EXCESS OF \$ 5,000.

Product Type: No Product

Alleged Damages: \$5,000.00

Alleged Damages Amount Explanation (if amount not exact): DAMAGES ALLEGED TO BE IN THE EXCESS OF \$ 5,000.

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: 03/05/2009

Complaint Pending? No

Status: Denied

Status Date: 06/18/2009

Settlement Amount:

Individual Contribution Amount:

Reporting Source: Individual
Employing firm when activities occurred which led to the complaint: UBS FINANCIAL SERVICES INC.

Allegations: TIME FRAME: JANUARY 2, 2008 TO DECEMBER 31, 2008. CLIENT ALELGES THAT FINANCIAL ADVISOR ASSURED HIM THAT BY "PLACING TIGHT STOPS" ON HIS ACCOUNT THAT IT WOULD NOT GO DOWN. DAMAGES ALLEGED TO BE IN EXCESS OF \$5,000.

Product Type: No Product

Alleged Damages: \$5,000.00

Is this an oral complaint? No

Is this a written complaint? Yes

Is this an arbitration/CFTC No



reparation or civil litigation?

Customer Complaint Information

Date Complaint Received: 03/05/2009

Complaint Pending? No

Status: Denied

Status Date: 06/18/2009

Settlement Amount:

Individual Contribution Amount:

Disclosure 4 of 4

Reporting Source: Firm

Employing firm when activities occurred which led to the complaint: UBS FINANCIAL SERVICES INC.

Allegations: TIME FRAME: 02/2006
THE CLIENT ALLEGES THAT HIS FINANCIAL ADVISOR DID NOT DISCLOSE THE RISKS INVOLVED WHEN HE PURCHASED HIS AUCTION RATE SECURITIES. DAMAGES ALLEGED TO BE IN EXCESS OF \$5,000.00.

Product Type: Other: AUCTION RATE SECURITIES - CLOSED END FUNDS

Alleged Damages: \$5,000.00

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: 01/29/2009

Complaint Pending? No

Status: Settled

Status Date: 01/20/2010

Settlement Amount: \$600,000.00

Individual Contribution Amount: \$0.00

Firm Statement HE COMPLAINT AROSE BECAUSE OF UNPRECEDENTED MARKET EVENTS THAT CAUSED THE BREAKDOWN OF LIQUIDITY IN THE MARKET FOR AUCTION RATE SECURITIES

Reporting Source: Individual

Employing firm when activities occurred which led to the complaint: UBS FINANCIAL SERVICES INC.

Allegations: TIME FRAME: 2/2006 THE CLIENT ALLEGES THAT HIS FINANCIAL ADVISOR



DID NOT DISCLOSE THE RISKS INVOLVED WHEN HE PURCHASED HIS AUCTION RATE SECURITIES. DAMAGES ALLEGED TO BE IN EXCESS OF \$5,000.00

Product Type: Other: AUCTION RATE SECURITIES - CLOSED END FUNDS

Alleged Damages: \$5,000.00

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: 01/29/2009

Complaint Pending? No

Status: Settled

Status Date: 01/20/2010

Settlement Amount: \$600,000.00

Individual Contribution Amount: \$0.00

Broker Statement THE COMPLAINT AROSE BECAUSE OF UNPRECEDENTED MARKET EVENTS THAT CAUSED THE BREAKDOWN OF LIQUIDITY IN THE MARKET FOR AUCTION RATE SECURITIES.



End of Report

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