BrokerCheck Report

WALTON RE SECURITIES, LLC

CRD# 172024

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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.

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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Thank you for using FINRA BrokerCheck.

Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org

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.

WALTON RE SECURITIES, LLC

CRD# 172024

SEC# 8-69494

Main Office Location

8800 N GAINEY CENTER DRIVE
SUITE 345
SCOTTSDALE, AZ 85258
Regulated by FINRA Denver Office

Mailing Address

8800 N GAINEY CENTER DRIVE
SUITE 345
SCOTTSDALE, AZ 85258

Business Telephone Number

480-586-9258

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 Delaware on 03/05/2014.

Its fiscal year ends in December.

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
- 51 U.S. states and territories

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

This firm conducts 2 types of businesses.

This firm is not affiliated with any financial or investment institutions.

This firm does not have 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 Delaware on 03/05/2014.

Its fiscal year ends in December.

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.

WALTON RE SECURITIES, LLC

Doing business as WALTON RE SECURITIES, LLC

CRD# 172024

SEC# 8-69494

Main Office Location

8800 N GAINEY CENTER DRIVE
SUITE 345
SCOTTSDALE, AZ 85258

Regulated by FINRA Denver Office

Mailing Address

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SCOTTSDALE, AZ 85258

Business Telephone Number

480-586-9258

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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):	WALTON INTERNATIONAL GROUP (S) PTE LTD.
Is this a domestic or foreign entity or an individual?	Foreign Entity
Position	FOREIGN ENTITY
Position Start Date	03/2020
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):	BARENBOIM, LEONARD 1523181
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO, AML OFFICER
Position Start Date	04/2016
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	GEORGE, CHRISTOPHER M 6084415
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP/POO
Position Start Date	07/2026

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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?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	HUBBARD, KATHLEEN 5564316
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT
Position Start Date	11/2025
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

Legal Name & CRD# (if any):	WALTON INTERNATIONAL GROUP LIMITED
Is this a domestic or foreign entity or an individual?	Foreign Entity
Company through which indirect ownership is established	WALTON INTERNATIONAL GROUP (S) PTE LTD.
Relationship to Direct Owner	OWNER
Relationship Established	04/1996
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

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Firm History

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

No information reported.

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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 51 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	02/27/2015

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	02/27/2015

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Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	02/21/2018
Alaska	Approved	04/04/2024
Arizona	Approved	07/25/2017
Arkansas	Approved	03/11/2022
California	Approved	06/22/2017
Colorado	Approved	08/02/2017
Connecticut	Approved	07/12/2017
Delaware	Approved	05/16/2022
District of Columbia	Approved	09/15/2017
Florida	Approved	09/22/2017
Georgia	Approved	06/22/2017
Hawaii	Approved	11/09/2023
Idaho	Approved	02/02/2018
Illinois	Approved	10/10/2017
Indiana	Approved	02/23/2018
Iowa	Approved	08/16/2017
Kansas	Approved	03/19/2018
Kentucky	Approved	03/14/2022
Louisiana	Approved	02/12/2018
Maine	Approved	05/16/2024
Maryland	Approved	05/12/2022
Massachusetts	Approved	04/05/2022
Michigan	Approved	02/23/2018
Minnesota	Approved	02/14/2018
Mississippi	Approved	06/13/2017
Missouri	Approved	03/19/2018
Montana	Approved	04/30/2024
Nebraska	Approved	03/13/2018
Nevada	Approved	09/21/2017
New Hampshire	Approved	04/25/2022
New Jersey	Approved	08/29/2023
New Mexico	Approved	02/26/2018
New York	Approved	06/19/2017
North Carolina	Approved	06/28/2017
North Dakota	Approved	02/22/2018
Ohio	Approved	09/18/2017
Oklahoma	Approved	02/23/2018
Oregon	Approved	02/27/2018
Pennsylvania	Approved	08/22/2022
Rhode Island	Approved	03/25/2024
South Carolina	Approved	10/04/2017
South Dakota	Approved	03/22/2024
Tennessee	Approved	04/05/2022
Texas	Approved	09/20/2017
Utah	Approved	02/07/2018
Vermont	Approved	05/07/2024
Virginia	Approved	06/06/2016
Washington	Approved	03/07/2018
West Virginia	Approved	04/10/2024
Wisconsin	Approved	02/13/2018
Wyoming	Approved	06/18/2024

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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 2 types of businesses.

Types of Business

Private placements of securities
Other - ACT AS A DEALER-MANAGER FOR THE DISTRIBUTION OF EQUITY AND DEBT SECURITIES, SUCH AS INTERESTS IN PUBLIC AND PRIVATE NON-LISTED REITS, BUSINESS DEVELOPMENT COMPANIES, AND OTHER DEBT AND EQUITY 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 not refer or introduce customers to other brokers and dealers.

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Firm Operations

Industry Arrangements

This firm does not have books or records maintained by a third party.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

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 not, 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.

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:	WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT CONDUCTED A SECURITIES BUSINESS BY SOLICITING PRIVATE PLACEMENT SALES WHILE BELOW ITS NET CAPITAL REQUIREMENT. THE FINDINGS STATED THAT ONE OF THE DEFICIENCIES WAS DUE TO THE FAILURE OF THE FIRM TO ACCRUE EXPENSES RELATED TO THE PREVIOUS YEAR'S ANNUAL AUDIT OF THE FIRM. THE FIRM WAS UNDER DIFFERENT OWNERSHIP AT THE TIME AND WAS IN THE PROCESS OF BEING ACQUIRED. AFTER THE ACQUISITION, THE FIRM AGAIN CONDUCTED A SECURITIES BUSINESS WHILE FAILING TO MAINTAIN ITS MINIMUM NET CAPITAL REQUIREMENT RESULTING IN A NET CAPITAL DEFICIENCY. BOTH DEFICIENCIES WERE DUE TO THE FAILURE OF THE FIRM TO ENSURE THAT CAPITAL INFUSIONS WERE TIMELY DEPOSITED INTO THE FIRM'S ACCOUNT. IN ADDITION, THE FIRM FAILED TO PROPERLY ACCRUE LIABILITIES FROM AN EXPENSE SHARING AGREEMENT (ESA). THE FIRM NEGOTIATED THE ESA WITH ITS PARENT COMPANY. THE FIRM'S ESTIMATED EXPENSES WERE $5,500 PER MONTH, TO BE PAID STARTING IN AUGUST 2020. HOWEVER, THE FIRM DID NOT ACCRUE ANY LIABILITIES UNDER THE ESA UNTIL OCTOBER 2020, AND IT UNDERSTATED ITS LIABILITIES UNDER THE ESA FOR MONTHS. THE FINDINGS ALSO STATED THAT THE FIRM FAILED TO FILE REQUIRED EXCHANGE ACT RULE 17A-11 NOTIFICATIONS. THE FIRM'S MINIMUM NET CAPITAL WAS BELOW ITS MINIMUM REQUIREMENT, YET THE FIRM DID NOT FILE A NOTICE WITH FINRA OR THE SEC. THE FINDINGS ALSO INCLUDED THAT THE FIRM FAILED TO MAKE AND KEEP ACCURATE BOOKS AND RECORDS. THE FIRM FAILED TO PREPARE AND MAINTAIN FINANCIAL BOOKS AND RECORDS REFLECTING AN ACCURATE COMPUTATION OF ITS AGGREGATE INDEBTEDNESS. THE FIRM MAINTAINED AN INACCURATE GENERAL LEDGER AND FAILED TO PREPARE ACCURATE NET CAPITAL COMPUTATIONS. THE FIRM ALSO SUBMITTED AN INACCURATE FOCUS REPORT IN DUE TO ITS FAILURE TO PROPERLY ACCRUE EXPENSES RELATED TO ITS ESA.
Initiated By:	FINRA
Date Initiated:	03/04/2024
Docket/Case Number:	2021071586901
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	

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Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	03/04/2024
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:	Censure Monetary/Fine $10,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM WAS CENSURED AND FINED $10,000. FINE PAID IN FULL ON JUNE 14, 2024.

Reporting Source:	Firm
Current Status:	Final
Allegations:	AT VARIOUS TIMES FROM MARCH 2020 THROUGH DECEMBER 2020, WALTON RE SECURITIES CONDUCTED A SECURITIES BUSINESS WHILE BELOW ITS NET CAPITAL REQUIREMENT. ALSO, DURING THIS TIME PERIOD, THE FIRM DID NOT PROPERLY ACCRUE EXPENSES FROM AN EXPENSE SHARING AGREEMENT, FILED AN INACCURATE FOCUS REPORT, AND MAINTAINED INACCURATE BOOKS AND RECORDS. IN ADDITION, THE FIRM FAILED TO PROVIDE REQUIRED NOTIFICATIONS TO FINRA REGARDING ITS NET CAPITAL LEVELS ON TWO OCCASIONS DURING THE RELEVANT PERIOD.
Initiated By:	FINANCIAL INDUSTRY REGULATORY AUTHORITY
Date Initiated:	03/04/2024
Docket/Case Number:	20210715869
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	MONETARY FINE $ 10,000
Resolution:	Acceptance, Waiver & Consent(AWC)

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Resolution Date:	03/04/2024
Sanctions Ordered:	Censure Monetary/Fine $10,000.00
Other Sanctions Ordered:	
Sanction Details:	WALTON RE SECURITIES ACCEPTED AWC ON FEBRUARY 27, 2024 AND PAID MONETARY FINE $ 10,000.
Firm Statement	ON 02/27/2024 WALTON RE SECURITIES ACCEPTED AWC AND CONSENTED TO IMPOSITION OF CENSURE AND AGREED TO PAY$ 10,000 FINE TO FINRA.

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End of Report

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