

BrokerCheck Report

DAVID ALLEN WALTERS

CRD# 1436760

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Please be aware that fraudsters may link to BrokerCheck from phishing and similar scam websites, trying to steal your personal information or your money. Make sure you know who you're dealing with when investing, and contact FINRA with any concerns.

For more information read our [investor alert](#) on imposters.

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:

- o 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
- o 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.



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.](http://www.finra.org)

Thank you for using FINRA BrokerCheck.

DAVID A. WALTERS

CRD# 1436760

This broker is not currently registered.

Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is not currently registered.

This broker has passed:

- 2 Principal/Supervisory Exams
- 4 General Industry/Product Exams
- 1 State Securities Law Exam

Registration History

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

- B NMS CAPITAL ADVISORS, LLC.**
CRD# 140356
Laguna Beach, CA
03/2019 - 09/2019
- B ADVISORY GROUP EQUITY SERVICES LTD.**
CRD# 15427
Laguna Beach, CA
06/2017 - 11/2018
- B DETWILER FENTON & CO.**
CRD# 1794
BOSTON, MA
06/2015 - 07/2017

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	1
Customer Dispute	1
Termination	1

Investment Adviser Representative Information

The information below represents the individual's record as a broker. For details on this individual's record as an investment adviser representative, visit the SEC's Investment Adviser Public Disclosure website at

<https://www.adviserinfo.sec.gov>

Broker Qualifications



Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This broker is not currently registered.



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

This individual has passed 2 principal/supervisory exams, 4 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
B Introducing Broker/Dealer Financial Operations Principal Examination	Series 28	12/06/2006
B General Securities Principal Examination	Series 24	05/05/1993

General Industry/Product Exams

Exam	Category	Date
B Securities Industry Essentials Examination	SIE	10/01/2018
B General Securities Representative Examination	Series 7	02/15/1986
B Foreign Currency Options Examination	Series 15	12/18/1985
B Interest Rate Options Examination	Series 5	12/09/1985

State Securities Law Exams

Exam	Category	Date
B Uniform Securities Agent State Law Examination	Series 63	11/18/1985

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.

Broker Qualifications



Professional Designations

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

No information reported.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
B 03/2019 - 09/2019	NMS CAPITAL ADVISORS, LLC.	140356	Laguna Beach, CA
B 06/2017 - 11/2018	ADVISORY GROUP EQUITY SERVICES LTD.	15427	Laguna Beach, CA
B 06/2015 - 07/2017	DETWILER FENTON & CO.	1794	BOSTON, MA
B 12/2014 - 05/2015	DETWILER FENTON WEALTH MANAGEMENT INC	16063	BOSTON, MA
B 01/2007 - 11/2014	MONARCH BAY SECURITIES, LLC	141391	NEWPORT BEACH, CA
B 01/2001 - 02/2007	DOHERTY & COMPANY, LLC	47984	LOS ANGELES, CA
B 12/1992 - 09/2000	ROTH CAPITAL PARTNERS, INC.	15407	NEWPORT BEACH, CA
B 05/1989 - 03/1991	DONALDSON, LUFKIN & JENRETTE SECURITIES CORPORATION	7560	JERSEY CITY, NJ
B 12/1985 - 06/1989	DREXEL BURNHAM LAMBERT INCORPORATED	7323	

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment	Employer Name	Position	Investment Related	Employer Location
03/2019 - Present	NMS Capital Advisors, LLC	CEO	Y	Los Angeles, CA, United States
06/2017 - Present	Advisory Group Equity Services Ltd	Registered Representative	Y	Woburn, MA, United States
05/2015 - 06/2017	DETWILER FENTON & CO.	CONSULTANT	Y	LAGUNA BEACH, CA, United States
12/2014 - 05/2015	DETWILER FENTON WEALTH MANAGEMENT, INC.	CONSULTANT	Y	BOSTON, MA, United States



Registration and Employment History

Employment History, continued

Employment	Employer Name	Position	Investment Related	Employer Location
09/2013 - 12/2014	MONARCH BAY ADVISORS, LLC	INDIRECT OWNER/ NO CONTROL	Y	NEWPORT BEACH, CA, United States
03/2006 - 12/2014	CARDIFF PARTNERS, LLC	MEMBER	N	SAN JUAN CAPISTRANO, CA, United States
09/2000 - 12/2014	MONARCH BAY CAPITAL GROUP, LLC	MEMBER & 100% OWNER	N	LAGUNA NIGUEL, CA, United States
03/2006 - 11/2014	MONARCH BAY SECURITIES, LLC	CONSULTANT	Y	NEWPORT BEACH, CA, United States
01/2014 - 05/2014	CROSSBOX, INC	DIRECTOR & INDIRECT OWNER	N	NEWPORT BEACH, CA, United States
01/2014 - 05/2014	CROSSBOX, LLC	MEMBER	N	NEWPORT BEACH, CA, United States
01/2014 - 05/2014	CROWD VELOCITY, INC	OFFICER, DIRECTOR, OWNER	Y	NEWPORT BEACH, CA, United States
10/2013 - 05/2014	LMMW, LLC	MEMBER	Y	NEWPORT BEACH, CA, United States
07/2012 - 05/2014	CAMINO PARTNERS, LLC	MEMBER	N	SAN JUAN CAPISTRANO, CA, United States
08/2006 - 05/2014	PRECISION AEROSPACE COMPONENTS, INC.	DIRECTOR	N	STATEN ISLAND, NY, United States
01/2011 - 09/2013	SIGNING AGENT CENTRAL, LLC	MEMBER	N	SAN JUAN CAPISTRANO, CA, United States
12/2006 - 09/2013	STI GROUP, INC. AND SUBSIDIARIES	DIRECTOR AND INDIRECT OWNER	N	SAN JUAN CAPISTRANO, CA, United States
07/2006 - 09/2013	BOUNCE MOBILE SYSTEMS, INC.	DIRECTOR & INDIRECT OWNER	N	SAN JUAN CAPISTRANO, CA, United States
11/2005 - 09/2013	MONARCH STAFFING, INC & SUBSIDIARIES	INDIRECT OWNER	N	SAN JUAN CAPISTRANO, CA, United States
11/2005 - 04/2012	MONARCH STAFFING, INC & SUBSIDIARIES	INDIRECT OWNER & DIRECTOR & EMPLOYEE	N	SAN JUAN CAPISTRANO, CA, United States



Registration and Employment History

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker 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)Laguna Advisory Partners, LLC, 1278 Glennerye, Laguna Beach, CA 92651, business advisory services, not investment related, managing member, start date January 2001, 10 hours per month, 2 during securities hours.
 - 2)Leading Edge Power Solutions, LLC, 1278 Glennerye, Laguna Beach, CA 92651, distributed energy generation, not investment related, Executive Chairman, start date June 1, 2017, 40 hours monthly, 10 during trading hours.
 - 3)Premier Business Processing, 128 N. 2nd Street, STE 210, Clarksville, TN 37040, Director, Business outsourcing, start date 3/19, 1 hour monthly, 0 during trading, non investment related.
 - 4)Boustead Securities, 6 Venture #265, Irvine CA 92618, investment related, started 1/17/2016, in process of selling interest in FINRA broker dealer, passive owner, 28.18%. 0 hours spent on activity.
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Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - o A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
 - o
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage 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 BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
 - o
4. **There are different statuses and dispositions for disclosure events:**
 - o 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.
 - o 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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	1	0
Customer Dispute	0	1	N/A
Termination	N/A	1	N/A



Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 1

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought:

Date Initiated: 10/27/2020

Docket/Case Number: [2018060587101](#)

Employing firm when activity occurred which led to the regulatory action: Advisory Group Equity Services Ltd.

Product Type: Other: Unspecified Securities

Allegations: Without admitting or denying the findings, Walters consented to the sanctions and to the entry of findings that he participated in private securities transactions without providing prior written notice to his member firm. The findings stated that Walters participated in four private securities transactions, in which individuals invested a total of \$450,000 in exchange for Series A Preferred Units of a company for which Walters served as executive chairman. Walters did not receive selling compensation, and none of the four investors was a customer of the firm. Walters' participation in the private securities transactions was outside the regular course and scope of his employment with the firm. While Walters disclosed the company to his firm as an outside business activity, he told the firm that the source of its capital would be personal assets rather than investments by third parties.



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: 10/27/2020

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

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? 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

Sanction Type:	Suspension
Capacities Affected:	All capacities
Duration:	4 months
Start Date:	11/02/2020
End Date:	03/01/2021



Monetary Sanction 1 of 1

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

Total Amount: \$5,000.00

Portion Levied against individual: \$5,000.00

Payment Plan: deferred

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived? No

Amount Waived:



Customer Dispute - Settled

This type of disclosure event involves a consumer-initiated, investment-related complaint, arbitration proceeding or civil suit containing allegations of sale practice violations against the broker that resulted in a monetary settlement to the customer.

Disclosure 1 of 1

Reporting Source:	Broker
Employing firm when activities occurred which led to the complaint:	SYSTEMS EVOLUTION, INC.
Allegations:	SYSTEMS EVOLUTION ALLEGES MR. WALTERS ACTING AS AN OFFICER OF SYSTEMS EVOLUTION ENGAGED IN A SERIES OF TRANSACTIONS THAT RESULTED IN SYSTEMS EVOLUTION HAVING A HIGH LEVEL OF DEBT.
Product Type:	Debt-Corporate
Alleged Damages:	\$0.00
Alleged Damages Amount Explanation (if amount not exact):	THE COMPLAINT DOES NOT SPECIFY THE AMOUNT COMPENSATORY DAMAGES BEING SOUGHT.

Civil Litigation Information

Type of Court:	State Court
Name of Court:	SUPREME COURT OF THE STATE OF NEW YORK, COUNTY OF NEW YORK
Location of Court:	NEW YORK
Docket/Case #:	600893/10
Date Notice/Process Served:	03/18/2011
Litigation Pending?	No
Disposition:	Settled
Disposition Date:	01/24/2013
Monetary Compensation Amount:	\$0.00
Individual Contribution Amount:	\$0.00



Employment Separation After Allegations

This type of disclosure event involves a situation where the broker voluntarily resigned, was discharged, or was permitted to resign after being accused of (1) violating investment-related statutes, regulations, rules or industry standards of conduct; (2) fraud or the wrongful taking of property; or (3) failure to supervise in connection with investment-related statutes, regulations, rules, or industry standards of conduct.

Disclosure 1 of 1

Reporting Source: Firm

Employer Name: Advisory Group Equity Services, Ltd

Termination Type: Discharged

Termination Date: 11/19/2018

Allegations: David Walters registered an Outside Business Activity (OBA), Leading Edge Power Solutions (LEPS) with the Firm. The OBA was approved on November 1, 2017 as it was not in conflict with the member's business and was self funded by the Partners in the OBA-LEPS. It came to the Firm's attention through a employment action, Filed on 10/31/2018, against Mr. Walters and LEPS that funds had been raised in the amount of \$450,000 from three investors. The Member was not informed nor did it approve of this activity. The activity of raising funds outside of the Firm is against the Firm's Written Supervisory Procedures and potentially FINRA Rules 3270 and 3280

Product Type: No Product

Reporting Source: Broker

Employer Name: Advisory Group Equity Services, Ltd.

Termination Type: Discharged

Termination Date: 11/19/2018

Allegations: Rep registered an OBA, Leading Edge Power Solutions (LEPS) with the firm. OBA was approved 11/1/17. Came to firm's attention through an employment action filed on 10/31/18 against Mr. Walters and LEPS that funds had been raised in the amount of \$450,000 from 3 investors. The firm was not informed or approve of the activity. The activity of raising funds outside of the firm was against the firm's WSPs and potentially FINRA rules 3270 and 3280.

Product Type: No Product

End of Report



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