

WALT ST Investment Management, Ltd. (“WSIM”)

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[3/31/2012](#)

**FORM ADV PART 2B
BROCHURE**

This brochure provides information about the qualifications and business practices of WSIM. If you have any questions about the contents of this brochure, please contact us at 2824 Sweet Flag Way, Stow, Ohio 44224, (330) 677-1950. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about WALT ST Investment Management, Ltd is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for WALT ST Investment Management, Ltd. is 109339.

WALT ST Investment Management, Ltd. is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Requirements for State-Registered Advisers

Form ADV Part 2B, Item 1

A. IDENTIFICATION OF EACH OF OUR PRINCIPAL EXECUTIVE OFFICERS AND MANAGEMENT PERSONS, AND DESCRIPTION OF THEIR FORMAL EDUCATIONS AND BUSINESS BACKGROUNDS.

We require that individuals involved in determining or giving investment advice complete two (2) of the following three (3) requirements:

- (1) attain a four-year college degree,
- (2) demonstrate five years of applicable industry experience or
- (3) have attained a general securities license equal to in stature or greater than a Series 7.

We will also require any individual involved in determining or giving investment advice on its behalf to complete a two-year mentoring program under the direction of Walter J. Sokira and will continue to work under his supervision at all times during employment with WSIM.

Jennifer Kay Sokira

Year of Birth 1973

Education:

St Leo University, Business Administration 2001 - current

Series 7 attained September 22, 1998

The College of Financial Planning, 1998-1999

The University of Akron, 1995

Business Background:

11/98 - Present

Walt St. Investment Management, Ltd., Stow, OH, President, Member

3/97 - 12/98

NatCity Investments, Inc., Akron, OH, Broker Dealer, Registered Representative

A. DESCRIPTION OF ANY BUSINESS IN WHICH WE ARE ACTIVELY ENGAGED FATHER THAN GIVING INVESTMENT ADVICE") AND THE APPROXIMATE AMOUNT OF TIME SPENT ON THAT BUSINESS.

We have nothing to disclose in this regard.

B. IN ADDITION TO THE DESCRIPTION OF OUR FEES IN RESPONSE TO ITEM 5 OF PART 2A. IF OUR FIRM OR A SUPERVISED PERSON IS COMPENSATED FOR ADVISORY SERVICES WITH PERFORMANCE-BASED FEES * WE MUST EXPLAIN HOW THESE FEES WILL BE CALCULATED. FURTHER, WE MUST DISCLOSE SPECIFICALLY THAT PERFORMANCE-BASED COMPENSATION MAY CREATE AN INCENTIVE FOR THE ADVISER TO RECOMMEND AN INVESTMENT THAT MAY CARRY A HIGHER DEGREE OF RISK TO THE CLIENT.

We do not charge performance-based fees.

C. IF OUR FIRM OR A MANAGEMENT PERSON HAS BEEN INVOLVED IN ONE OF THE EVENTS LISTED BELOW, WE MUST DISCLOSE ALL MATERIAL FACTS REGARDING THE EVENT.

1. An award or otherwise being found liable in an arbitration claim alleging damages in excess of \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statements), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

We have nothing to disclose in regards to Item D(1) above.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity;
 - (b) fraud, false statement(s), or omissions;
 - (c) theft, embezzlement, or other wrongful taking of property;
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

We have nothing to disclose in regards to Item D(2) above.

D. IN ADDITION TO ANY RELATIONSHIP OR ARRANGEMENT DESCRIBED IN RESPONSE TO ITEM 10.C. OF PART 2A. WE MUST DESCRIBE ANY RELATIONSHIP OR ARRANGEMENT THAT OUR FIRM OR ANY OF OUR MANAGEMENT PERSONS HAVE WITH ANY ISSUER OF SECURITIES THAT IS NOT LISTED IN ITEM 10.C. OF PART 2A.

We do not have additional information to disclose in this regards.