

**ITEM 1: COVER PAGE FOR  
PART 2B OF FORM ADV:  
BROCHURE SUPPLEMENT  
DATED MARCH 30, 2012**

**GARY K. IMUS**

**IMUS WILKINSON INVESTMENT MANAGEMENT, LLC**

**1820 EAST RIVER ROAD, SUITE 104  
TUCSON, AZ 85718**

**ELBRIDGE G. WILKINSON, MANAGING PARTNER AND CHIEF COMPLIANCE  
OFFICER**

**WWW.IMUSWILKINSON.COM**

**This brochure supplement provides information about Gary K. Imus that supplements our brochure. You should have received a copy of that brochure. Please contact Mr. Wilkinson if you did not receive Imus Wilkinson Investment Management, LLC's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Mr. Imus is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **Item 2 Educational Background and Business Experience**

We are required to disclose the following information about Mr. Imus:

**Gary K. Imus**

Year of Birth: 1948

### **Formal Education after high school:**

09/1966-05/1968, Attended Washington State University as an Honors Chemistry Major

### **Business Background:**

05/2011- Present, Imus Wilkinson Investment Management, LLC

1997- 2011, RBC Wealth Management, First Vice President, Financial Consultant

### **Professional Licenses and Exams:**

Series 3

Series 7

Series 15

Series 63

Series 65

## **Item 3 Disciplinary Information**

If there are legal or disciplinary events material to your evaluation of Mr. Imus, we are required to disclose all material facts regarding those events.<sup>1</sup>

We have nothing to disclose in this regard.

## **Item 4 Other Business Activities**

- A. If Mr. Imus is actively engaged in any investment-related business or occupation, including if he is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

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<sup>1</sup> **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Mr. Imus to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Mr. Imus to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

1. If a relationship between the advisory business and Mr. Imus's other financial industry activities creates a material conflict of interest with you, the SEC requires us to describe the nature of the conflict and generally how we address it.

We have nothing to disclose in this regard.

2. If Mr. Imus receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service ("trail") fees from the sale of mutual funds, we have to disclose this fact. If this compensation is not cash, we are required to explain what type of compensation he receives. We must explain that this practice gives Mr. Imus an incentive to recommend investment products based on the compensation received, rather than on your needs.

We have nothing to disclose in this regard.

- B. If Mr. Imus is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of his income or involve a substantial amount of his time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Mr. Imus's time and income, we may presume that they are not substantial.

Mr. Imus is a licensed insurance agent with various insurance companies/agencies. He may receive the normal commissions for insurance sales in his separate role as an insurance agent.

### **Item 5 Additional Compensation**

If someone who is not a client provides an economic benefit to Mr. Imus for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include his regular salary. Any bonus that is based, at least in part, on the number or amount of sales, client referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

### **Item 6 Supervision**

We are required to explain how we supervise Mr. Imus, including how we monitor the advice he provides to you. Our firm has to provide the name, title and telephone number of the person responsible for supervising Mr. Imus' advisory activities on behalf of our firm.

Mr. Wilkinson, Managing Partner and Chief Compliance Officer of Imus Wilkinson Investment Management, LLC, supervises Mr. Imus' activities to ensure compliance with our firm's Code of Ethics. Please contact Mr. Wilkinson if you have any questions about Mr. Imus' brochure supplement at (520) 777-1911.

## **Item 7. Requirements for State-Registered Advisers**

A. In addition to the events listed in Item 3 of Part 2B, if Mr. Imus has been involved in one of the events listed below, we 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 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.

While employed at Prudential Securities, Inc., a customer alleged Mr. Imus made misrepresentations regarding sale of \$112,000.00 in suitable direct investments. This case was settled on 08/21/1993 and no action was taken against Mr. Imus.

While employed at PSI, a customer alleged Mr. Imus made certain omissions and misrepresentations in connection with her investment in certain limited partnerships, claiming damages of \$145,000.00. This case was settled on 11/01/1992 and no action was taken against Mr. Imus.

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.

The National Association of Securities Dealers, Inc. alleged that Mr. Imus made recommendations for the purchase and sale of securities to public customers that were unsuitable for those customers in view of the frequency of the recommended transactions and the use of margin in connection with those transactions.

Without admitting or denying the allegations, Mr. Imus consented to the described sanctions and to the entry of findings, therefore, he was censured and fined \$17,000.

B. If Mr. Imus has been the subject of a bankruptcy petition, we must disclose that fact, the date the petition was first brought, and the current status.

We have nothing to disclose in this regard.