

WALTON RE SECURITIES LLC

Walton RE Securities, LLC ("Walton RE ") is registered with the United States Securities and Exchange Commission (SEC) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (FINRA) and the Securities Investor Protection Corporation (SIPC). Walton RE does not provide investment advisory services. Brokerage and investment advisory services and fees differ in nature, and it is important for you to understand these differences. Free and simple tools are available to research firms such as Walton RE Securities at <https://www.investor.gov/crs>, which also provides educational materials about broker-dealers, investment advisers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN WALTON RE SECURITIES PROVIDE TO ME?

Brokerage Services: Walton RE offers its brokerage services on a wholesale basis only to registered investment advisors and other financial institutions, which may serve retail investors. Walton RE charges only transaction-based commissions and those are usually paid by the securities issuers, not by you. **Walton RE does not open, nor does it maintain, retail customer accounts.** We also market private investments into unregistered and restricted securities via private placements.

This is a summary of the types of services we provide and how you pay for these services. A traditional broker-dealer executes specific transactions on your behalf and gets paid on a per transaction basis. Walton RE and its financial professionals can offer and sell private placements or provide you with investment opportunity introductions and/or due diligence review services. With very few exceptions, Walton RE interacts with accredited investors, qualified institutional buyers and qualified purchasers. By comparison, other firms may offer a wider range of investment opportunities and at a lower cost.

Walton RE does not open client accounts, does not hold client funds or securities, and does not offer investment strategies. As such, we do not monitor any investments for any retail clients. Walton RE may present investment opportunities consistent with your investor profile as presented to us by you. Walton RE may present these opportunities and supporting documentation provided by a security issuer, but Walton RE does not make any endorsements or representations as to the accuracy, completeness or validity of the documentation. In addition, Walton RE does not provide investment advice or make any recommendations. All Investors must make the ultimate decision regarding their selection of investments.

As an Accredited Investor, you have to understand the risks and rewards associated with any investments made through Walton RE. However, and if in doubt, Walton RE encourages you to consult with an independent advisor or other source.

For additional information about us, please see FINRA BrokerCheck: <https://brokercheck.finra.org/firm/summary/172024>

Conversation Starters: Ask your financial professional -

- ../ Given my financial situation, should I choose a brokerage service? Why or why not?
- ../ How will you choose investments to recommend to me?
- ../ What is your relevant experience including your licenses, education and other qualifications?
What do these qualifications mean?

WHAT FEES WILL I PAY?

There are no costs associated with establishing or maintaining a relationship with Walton RE. The fees you pay are based on the specific transaction(s) undertaken and the costs associated with engaging our firm. Walton RE acts as a broker-dealer and **collects business advisory and transaction-based fees from Securities Issuers.** Fees are paid to Walton RE by the Securities Issuer when you make an investment. Although you do not pay Walton RE directly, the Securities Issuer compensates Walton RE from the proceeds of your investment. Any fees and costs that you will bear related to a specific investment will be explicitly disclosed in that investment's offering and/or purchase materials.

In addition to the fees and costs that you pay to Walton RE, you may also incur additional fees and costs related to individual investments. Examples of some of the most common fees and costs include fees paid to investment advisers or fund managers, administrative fees, audit and valuation fees and costs, and legal costs.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce the amount of money you earn or gain on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information, please see investment offering documentation.

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN PROVIDING RECOMMENDATIONS? HOW DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTEREST DO THEY HAVE?

When/If we provide you with a recommendation, we must act in your best interest and not put our interest ahead of yours. At the same time, the way Walton RE makes money creates inherent conflicts with your interests. You should understand and ask us about these conflicts because they may affect the recommendations, we provide you with. Here are some examples to help you understand what this means:

Limited Investment Offerings: Our brokerage services and recommendations cover a limited selection of investments. Many other firms may provide a wider range of investment and service choices.

Transaction Fees: Walton RE typically makes money when it is paid by the seller of the investment you make. In some cases, Walton RE's commission is a percentage of the total amount of the investment it sells. In other cases, our firm's commission is a percentage of the fees earned by third parties who manage the funds in which you invest. Walton RE only gets paid when you complete a transaction, it may have an incentive to encourage you to make larger investments and invest more frequently.

Private Securities Transactions: Walton RE permits its representatives and their family members to conduct certain transactions and investment activities on their own behalf, and these activities are subject to additional securities laws, rules, and regulations. Your Walton RE representative may, therefore, have an incentive to introduce or recommend investments to you in which he or she is also invested or otherwise has financial or other kind of interest.

Other Compensation: Walton RE does not have sales contests or pay performance-based bonuses to its representatives. Other than the commissions and other fees paid to us directly or indirectly, Walton RE does not receive other compensation or benefits unless fully disclosed to you.

Other conflicts of interest: Walton RE does offer proprietary investment products as issued by its affiliated companies and will inform you if there are other products or services provided by the firm that are similar and/or less costly. Furthermore, registered representatives of Walton RE Securities are affiliated with the parent company of Walton RE Securities called Walton Global, and which may act as a sponsor of issuers whose securities Walton RE distributes, primarily in a wholesale format. These registered representatives may participate in the establishment of securities issuers and provide other organizational services to Walton Global, but they do not receive compensation from Walton Global that is associated with sales of securities.

For additional information, please see investment offering documentation.

Conversation Starter: Ask your financial professional -

./ How might your conflicts of interest affect me, and how will you address them?

HOW DOES YOUR REPRESENTATIVE MAKE MONEY?

Walton RE receives compensation from the Security Issuer if there is a successful transaction. Compensation is usually calculated as a percentage of your investment amount. Therefore, Walton RE gets paid by the Security Issuer only after your investment has been made with the Security Issuer. In some instances, Walton RE may also receive business advisory, retainer or other fees from the Security Issuer whether you invest or not. These fees are not tied to the size of your investment. Your representative receives a percentage of the fee revenue he or she generates for Walton RE. Therefore, your representative has an incentive to encourage you to buy and sell securities more frequently.

DOES YOUR FIRM OR YOUR REPRESENTATIVES HAVE LEGAL OR DISCIPLINARY HISTORY?

YES. Disclosures related to the Firm and/or its representatives, if any, can be reviewed on Broker Check found at www.finra.org or visit [www: Investor.gov/CRS](http://www.investor.gov/CRS) for a free search tool to research Walton RE and its representatives.

Conversation Starter: Ask your financial professional -

./ As a financial professional, do you have any disciplinary history? For what type of conduct?

ADDITIONAL INFORMATION

You can find additional information about the services we provide, fees you pay, and conflicts of interest by calling us at 833-217-1715.

Conversation Starter: Ask your financial professional -

./ Who is my primary contact person?

./ Is he or she a representative of an investment adviser or a broker-dealer?

./ Who can I talk to if I have concerns about how this person is treating me.