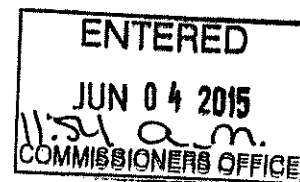


COMMONWEALTH OF KENTUCKY  
PUBLIC PROTECTION CABINET  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
AGENCY CASE NO. 2015-AH-0072



DEPARTMENT OF FINANCIAL INSTITUTIONS

COMPLAINANT

v.

ROBERT M. WALKER & ASSOCIATES, INC.

RESPONDENT

**AGREED ORDER**

**BACKGROUND AND FACTUAL FINDINGS**

1. The Department of Financial Institutions (“DFI”) is the agency of Kentucky state government charged with enforcement of the provisions of KRS Chapter 292 (the “Securities Act of Kentucky”) and the rules and regulations enacted thereunder.

2. Robert M. Walker & Associates, Inc. (“Walker & Associates”) is a Kentucky registered Investment Adviser with its principal office is located at 91 Wooded Creek Court, Taylorsville, Kentucky 40071, having CRD # 122671.

3. On September 18, 2014, DFI conducted a routine investment adviser examination of Walker & Associates to determine whether it was operating in compliance with applicable laws and regulations, and in the public interest.

4. During the examination, DFI determined that Walker & Associates violated 808 KAR 10:200, Section 3(3) by failing to maintain the required minimum net worth, and violated 808 KAR 10:200, Section 3(7) by failing to notify the commissioner of the deficiencies in net worth.

## AGREEMENT AND ORDER

5. The DFI possesses a range of administrative authority in addressing violations of KRS Chapter 292 and the administrative regulations promulgated thereunder, including registration suspension, limitation, revocation, and the imposition of fines in an amount up to \$20,000 per violation. *See* KRS 292.337; 292.500(14).

6. In this case, the DFI assessed a fine against Walker & Associates in the amount of two thousand dollars (\$2,000) for the above-described violations of 808 KAR 10:200, Section 3.

7. The Department of Financial Institutions and Walker & Associates, in the interest of economically and efficiently resolving the violations described in the foregoing Background and Factual Findings, agree as follows:

a. Walker & Associates agrees to pay a fine in the amount of Two Thousand Dollars (\$2,000) for the violations set forth above, which shall be made payable to the "Kentucky State Treasurer" and mailed to the Department of Financial Institutions, Attn: Division of Securities, 1025 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601. Payment shall be due upon entry of this Agreed Order, and must be made by certified check or money order; and

b. Walker & Associates shall devote the time and resources necessary to ensure full and continual compliance with KRS Chapter 292 and the regulations promulgated thereunder.

8. In regard to this matter, Walker & Associates waives its right to demand a hearing, at which Walker & Associates would be entitled to legal representation, to confront and cross examine witnesses for DFI, and to present evidence on its own behalf. Further, Walker & Associates consents to and acknowledges the jurisdiction of DFI over this matter, and

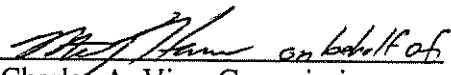
acknowledges that this Agreed Order is a matter of public record and may be disseminated as such.

9. In consideration of the execution of this Agreed Order, Walker & Associates, for itself, and for its successors and assigns, hereby releases and forever discharges the Commonwealth of Kentucky, the DFI, the Office of Legal Services, and each of their members, agents and employees in their individual capacities, from any and all manner of actions, causes of actions, suits, debts, judgments, executions, claims and demands whatsoever, known and unknown, in law or equity, that Walker & Associates ever had, now has, may have or claim to have against any and all of the persons or entities named in this paragraph arising out of or by reason of this examination or this order.

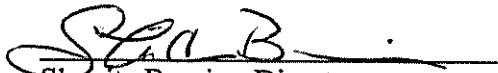
10. By signing below, the parties acknowledge that they have read the foregoing Agreed Order, know and understand its contents, and that they are authorized to enter into and execute this Agreed Order and legally bind their respective parties.

11. This Agreed Order shall constitute the Final Order in this matter.

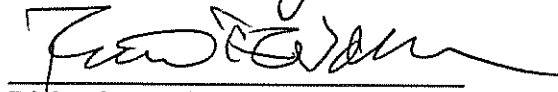
**IT IS SO ORDERED** on this the 4<sup>th</sup> day of June, 2015.

  
Charles A. Vice, Commissioner  
*Charles Vice*

Consented to:  
This 1 day of June, 2015

  
Shonita Bossier, Director  
Division of Securities  
Department of Financial Institutions

Consented to:  
This 30<sup>th</sup> day of May, 2015

  
Richard Douglas Walker, President  
Robert M. Walker & Associates, Inc.

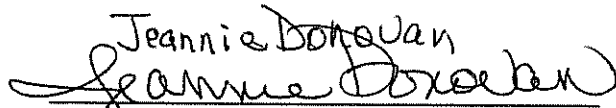
**ACKNOWLEDGEMENT**

STATE OF KY )  
COUNTY OF Spencer )

On this the 30 day of May, 2015, before me Richard Douglas Walker the undersigned, **Richard Douglas Walker**, did personally appear and acknowledge himself/herself to be the authorized representative of Robert M. Walker & Associates, Inc. (CRD #122671) and that he, being authorized to do so, entered into and executed the foregoing instrument for the purposes therein contained.

In witness whereof I hereunto set my hand.

My Commission Expires: 1-15-18

  
Jeannie Donovan  
Notary Public 503530

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Agreed Order was sent by certified United States mail, return receipt requested, on this the 4 day of ~~September~~, 2015, to the following:  
June

Richard Douglas Walker  
Robert M. Walker & Associates, Inc.  
91 Wooded Creek Court  
Taylorsville, Kentucky 40071

And by hand delivery to:

John C. Allender  
Legal Counsel  
Department of Financial Institutions  
1025 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601



Christina Hayden  
Department of Financial Institutions