

**Firm Brochure  
(Part 2A Form ADV)**

**January 1, 2024**

**David Scott Curtis, dba  
The Curtis Company  
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Los Angeles, California 90077 USA  
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CRD Number: 313258**

**Part 2A of Form ADV (the “brochure”) provides information about the qualifications and business practices of David Scott Curtis, dba The Curtis Company. If you have any questions about the contents of this Brochure, please contact David Curtis at 310-712-8121. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority.**

**David Scott Curtis, dba The Curtis Company is registered as an investment advisor with the State of California; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.**

**A copy of this Brochure can be obtained anytime by calling 310-712-8121.**

**Additional information about David Scott Curtis, dba The Curtis Company and its investment advisor representatives, is also available on the SEC’s website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).**

**David Scott Curtis, dba  
The Curtis Company  
Form ADV Part 2A**

**January 1, 2024**

Item 1: Cover Page

Please refer to previous page.

Item 2: Material Changes

David Scott Curtis, dba The Curtis Company is filing this “Brochure” as a third filing, with no material changes.

Item 3: Table of Contents

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Item 4: Advisory Business

A. Description of Firm

David Scott Curtis, dba The Curtis Company is a California based investment advisory firm providing impartial and nonpersonal advice about Modern Portfolio Theory.

Mr. Curtis trades financial and physical commodities and commodity futures for Contract Eligible Participants and Qualified Eligible Participants, by invitation only.

Mr. Curtis refers private company owners to Registered Investment Advisors who manage and operate private equity firms, by invitation only.

Mr. Curtis lists and sells California real estate for friends and family only.

B. Principal Owner

The firm is owned and operated by David Scott Curtis, dba The Curtis Company, a Sole Proprietor.

C. Types of Advisory Services Offered

David Scott Curtis, dba The Curtis Company does not trade client securities accounts. Mr. Curtis recommends alternative asset class investing, such as fixed-based financial products, commodities, real estate, and private equity sponsored private placements.

D. Advisory Agreements

David Scott Curtis, dba The Curtis Company does not maintain individual investment advisory agreements. Mr. Curtis does not participate in wrap-fee programs.

E. Assets Under Management

David Scott Curtis, dba The Curtis Company has no publicly registered assets under management on a discretionary basis, and no publicly registered assets under management on a non-discretionary basis.

Item 5: Fees and Compensation

Compensation for Advisory Services

Mr. Curtis is a fee-based advisor, compensated through directly negotiated hourly rates, fixed fees, performance-based fees, and transaction fees.

Mr. Curtis receives directly negotiated transaction fees from Registered Investment Advisors for introductions to private equity related and debt investments made in middle-market companies based primarily in the United States, trading unregistered securities with the company's most recent fiscal year generally having EBITDA less than \$25 million and/or revenue less than \$250 million.

Lower fees for comparable services may be available from other sources, and because Mr. Curtis recommends the sale of securities and the purchasing of alternative investments, a potential conflict of interest is automatically created. Clients are made aware of this potential conflict of interest up-front, as the basis and prelude to Mr. Curtis introducing alternative financial concepts and strategies. Mr. Curtis does not collect asset-based sales charges, nor service-fees from the sale of mutual-funds, nor the sale of other related securities activities. Mr. Curtis does not charge clients fees nor expenses for securities investment related advisory services and for further information about Mr. Curtis' brokerage practice, refer to Page 7, Item 12.

Item 6: Performance Based Fees and Side by Side Management

David Scott Curtis, dba The Curtis Company does not charge performance-based fees on any specific securities recommended for trading, nor does Mr. Curtis engage in side-by-side management of any securities accounts.

Item 7: Types of Clients

Mr. Curtis' clients exclusively include Qualified Clients, Qualified Purchasers, Accredited Investors, Contract Eligible Participants and Qualified Eligible Participants.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

David Scott Curtis, dba The Curtis Company investment advisory practice provides impartial and nonpersonal advice about Modern Portfolio Theory, in an effort to enhance the risk adjusted returns of a client's total portfolio.

**The Risk of Loss investing in private equity transactions and the Risk of Loss trading commodity futures can be substantial and is not suitable for everyone - and under certain market conditions it may be difficult or impossible to liquidate a position.**

Item 9: Disciplinary Information

Registered Investment Advisors such as David Scott Curtis, dba The Curtis Company is required to disclose all material facts regarding any legal or disciplinary events that would be material to a client or prospective client's valuation of David Scott Curtis, dba The Curtis Company, or the integrity of its management. David Scott Curtis, dba The Curtis Company does not have any such legal, nor disciplinary events of any kind, past or present and therefore, there are no disclosures to be made with respect to this item.

Item 10: Other Financial Industry Activities and Affiliations

David Scott Curtis, dba The Curtis Company has a California Real Estate License 0129488, and Mr. Curtis is a National Futures Association Member 0547146, registered as a Commodity Trading Advisor.

Neither Mr. Curtis, nor any people supervised by Mr. Curtis have an application pending to register as a Broker/Dealer, nor a registered representative of a Broker/Dealer, nor a Commodity Pool Operator, nor a Futures Commission Merchant, nor an Introducing Broker, nor a Floor Broker, nor a Floor Trader, nor a Retail Foreign Exchange Dealer, nor a Swap Dealer.

Item 11: Code of Ethics, Participation/Interest in Client Transactions & Personal Trading

David Scott Curtis, dba The Curtis Company code of ethics includes total transparency and complete confidentiality. David Scott Curtis, dba The Curtis Company does not enter any principal transactions, nor agency cross transactions on behalf of client accounts. David Scott Curtis, dba The Curtis Company does not trade client securities accounts.

Item 12: Brokerage Practices

David Scott Curtis, dba The Curtis Company refers Accredited Investors to Registered Investment Advisors, and Investment Advisor Representatives who may also be a Registered Representative of a Broker/Dealer for direct compensation provided from the advisor being introduced.

Item 13: Review of Accounts

David Scott Curtis, dba The Curtis Company is not a financial planner and does not review nor approve securities accounts.

Item 14: Client Referrals and Other Compensation

David Scott Curtis, dba The Curtis Company refers Qualified Eligible Participants and Qualified Purchasers to other Commodity Trading Advisors, Registered Investment Advisors, and Investment Advisor Representatives who may also be a Registered Representative of a Broker/Dealer for fee-based compensation provided from the registered advisor being introduced.

Item 15: Custody

David Scott Curtis, dba The Curtis Company does not take custody of client funds.

Item 16: Investment Discretion

David Scott Curtis, dba The Curtis Company does not maintain discretionary authority over client accounts, and Mr. Curtis does not provide specific securities related advice.

Item 17: Voting Client Securities

David Scott Curtis, dba The Curtis Company does not have proxy voting privileges over any client accounts.

Item 18: Financial Information

David Scott Curtis, dba The Curtis Company does not accept pre-payment for products and service.

Item 19: Requirements for State Registered Advisors

**A. Principal Executive Officer and Managing Person**

David Scott Curtis is the firm's managing member. Please refer to David Scott Curtis, dba The Curtis Company's supplemental brochure (Form ADV Part 2B) for more information about Mr. Curtis' formal education and business background. This document, which is provided to new clients and existing clients, whenever a material change is made, can be obtained upon request and is viewable on the SEC's public website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).

**B. Other Business Activities**

Please refer to Items 5, 10, and 14 for additional information about these activities.

**C. Performance Based Fees**

As noted in response to Item 6 above, David Scott Curtis, dba The Curtis Company does not charge performance-based fees on any securities recommended for trading, (fees based on a share of capital gains or capital appreciation of the assets of a Clients Securities Account).

**D. Disciplinary or Legal Events**

David Scott Curtis, dba The Curtis Company has no legal, nor disciplinary events of any kind, past or present.

**E. Relationships or Arrangements with Issuers of Securities**

David Scott Curtis, dba The Curtis Company does not have any relationships, nor arrangements with any issuers of securities.

**F. Disclosure of Material Conflicts of Interest**

Material conflicts of interest relating to David Scott Curtis, dba The Curtis Company and its associates, which would be reasonably expected to impair the rendering and objective advice, have been disclosed herein.



**Brochure Supplement  
Part 2B Form ADV**

**January 1, 2024**

**David Scott Curtis  
Personal CRD Number: 2436324**

**David Scott Curtis, dba  
The Curtis Company  
10256 Mossy Rock Circle  
Los Angeles, California 90077 USA  
1-310-712-8121 (telephone)  
[david@davidcurtis.net](mailto:david@davidcurtis.net) (email)  
CRD Number: 313258**

**This Brochure Supplement provides information about David Scott Curtis, that supplements David Scott Curtis, dba The Curtis Company Brochure.**

**Additional information about David Scott Curtis is available on the SEC's website at [www.advisorinfo.sec.gov](http://www.advisorinfo.sec.gov).**

Item 2: Educational Background and Business Experience

David Scott Curtis  
Year of Birth: 1968

**Educational Background:**

University of Arizona  
Bachelor of Arts - Awarded on August 8, 1991.

**Business Background:**

June 1, 1997 – Present: The Curtis Company - Corporate Mergers & Acquisitions.

March 1, 2021 – Present: David Scott Curtis applied to be an Investment Advisor Representative for David Scott Curtis, dba The Curtis Company.

March 4, 2022 – Present: David Scott Curtis, dba The Curtis Company applied to be a National Futures Association Member and is registered as a Commodity Trading Advisor 0547146.

Item 3: Disciplinary Information

David Scott Curtis (“Mr. Curtis”), as a registered investment advisor, is required to disclose all material facts regarding any legal or disciplinary events that would be made material to your evaluation of him. Mr. Curtis has no legal, nor disciplinary events of any kind, past or present, required to be disclosed under this item.

Item 4: Other Business Activities

Mr. Curtis trades financial and physical commodities and commodity futures for Contract Eligible Participants and Qualified Eligible Participants, by invitation only.

Mr. Curtis provides managed futures capital introductions and refers Contract Eligible Participants and Qualified Eligible Participants to other Commodity Trading Advisors who may also be Commodity Pool Operators.

Item 5: Additional Compensation

Mr. Curtis is a fee-based advisor, compensated through directly negotiated hourly rates, fixed fees, performance-based fees, and transaction fees.

Mr. Curtis receives directly negotiated transaction fees from Registered Investment Advisors for introductions to private equity related and debt investments made in middle-market companies based primarily in the United States, trading unregistered securities with the company's most recent fiscal year generally having EBITDA less than \$25 million and/or revenue less than \$250 million.

Item 6: Supervision

Mr. Curtis adheres to a strict code of ethics defined and described by David Scott Curtis, dba The Curtis Company.

Item 7: Requirements for State Registered Advisors

A. Additional Disciplinary Information

As disclosed in Item 3 above, Mr. Curtis has no disciplinary nor legal information to disclose. Specifically, Mr. Curtis has not (1) paid an award or otherwise found liable in an arbitration claim alleging damages more than \$2,500 involving any of the following: (i) an investment or an investment related business activity; (ii) fraud, false statement(s), or omissions; (iii) theft, embezzlement or other wrongful taking of property; (iv) bribery, forgery, counterfeiting or extortion; or (v) dishonest, unfair, or unethical practices.

B. Bankruptcy Information

Mr. Curtis has not been the subject of any bankruptcy proceedings.