



**URBAN WEALTH  
MANAGEMENT GROUP, LLC**

FORM ADV PART 2A

FIRM BROCHURE

March 28, 2024

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This Form ADV Part 2A (“Firm Brochure”) provides information about the qualifications and business practices of Urban Wealth Management Group, LLC (“UWM” or the “Adviser”). If you have any questions about the contents of this Firm Brochure, please contact us at (424) 277-2260 or [lily.huber@urbanwm.com](mailto:lily.huber@urbanwm.com). The information in this Firm Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration does not imply a certain level of skill or training.

Additional information about UWM is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site may be searched by a unique identifying number known as a CRD number. UWM’s CRD number is 285633.

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## ITEM 2: MATERIAL CHANGES

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This version of UWM's Firm Brochure, dated March 28, 2024, is our other than annual amendment. It contains information regarding our qualifications, business practices, nature of the advisory services we provide, as well as a reasonable disclosure of any known and potential material conflicts of interest relating to our advisory business that could affect a client's account with us. You should rely on the information contained in this document or other information that we have referred you to. We have not authorized anyone to provide you with information that is different. We encourage all current and prospective clients to read this Firm Brochure and discuss any questions you have with us. Should you have any additional questions or concerns regarding UWM or the contents of this Firm Brochure, please contact Lily Huber, Chief Compliance Officer at (424) 277-2260 or [lily.huber@urbanwm.com](mailto:lily.huber@urbanwm.com).

### MATERIAL CHANGES SINCE THE LAST UPDATE

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The material changes in this brochure from the last annual updating amendment of UWM on 03/31/2023 are described below. Material changes relate to UWM's policies, practices or conflicts of interests.

- UWM provides Estate Planning services. (Items 4 & 5)
- UMM updated their financial planning fees. (Item 5)
- Fees are now payable via ChargeZoom. (Item 5)

### **FULL BROCHURE AVAILABLE**

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From time to time, we will amend this Firm Brochure to reflect changes in business practices, regulations, and other routine updates as required by the respective regulators. This complete Firm Brochure or a Summary of Material Changes will be provided to you at least annually.

At any time, you can view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD No. 285633. To request a complete copy of our Firm Brochure, contact us by telephone at (424) 277-2260 or by email at [info@urbanwm.com](mailto:info@urbanwm.com).

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## ITEM 4: ADVISORY BUSINESS

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### FIRM DESCRIPTION

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Urban Wealth Management, LLC (“UWM”, the “Firm”, or the “Adviser”) was founded in 2012 and became an SEC registered investment advisory firm in 2017. The Adviser provides investment management services and financial planning services to individuals, businesses, and charitable organizations through customized portfolios and separately managed accounts for a fee. The Adviser is a fee-based investment management and financial planning firm.

René Nourse is the owner of UWM. Additional information about Ms. Nourse’s background may be found in the accompanying Form ADV Part 2B Brochure Supplement.

### TYPES OF ADVISORY SERVICES

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UWM dedicates itself to understanding the intricacies of each client. For all investment advisory and related services described below, we tailor our products in accordance with the client-specific needs obtained from documented discussions, a financial plan and/or risk assessment. Before providing investment advisory services, UWM takes multiple factors into consideration, including, but not limited to, investment objectives, investment horizon, risk tolerance, as well as any reasonable guidelines and restrictions a client may need or impose. On more than an occasional basis, UWM furnishes advice to clients on matters not involving securities, such as financial planning matters, taxation issues, retirement, and estate planning. All assets are managed on a discretionary basis.

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### INVESTMENT MANAGEMENT SERVICES

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As part of the investment management service, all aspects of the client’s financial affairs are reviewed, realistic and measurable goals are set, and objectives to reach those goals are defined. The investment management service includes analysis of existing portfolio, personalized risk questionnaire and analysis, Investment Policy Statement, asset allocation, research, portfolio construction and monitoring. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis. The Adviser periodically reviews a client’s financial situation and portfolio through regular contact with the client which often includes an annual meeting with the client. The Adviser makes use of portfolio rebalancing software to maintain client allocations according to the Investment Policy Statement in effect.

The scope of work and fees are provided to the client in writing prior to the start of the relationship via the Investment Advisory Services Agreement (the “IMA”). The IMA sets forth the services to be provided, the fees for the service, and the IMA may be terminated by the client or UWM, in writing, at any time.

#### *Sub-Advisory Services:*

UWM offers individually managed funds or separately managed account programs sponsored by various unaffiliated third-party advisers such as AssetMark, Envestnet, or other third-party service providers (“Sub-Advisor”). In third-party separately managed account programs, the program sponsor selects the investments, monitors and evaluates investment performance, executes portfolio transactions without commission charges, and provides custodial services. Where employed, the Adviser will delegate its

discretionary investment authority to the Sub-Advisor to research and select and monitor portfolio securities for each client.

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## FINANCIAL PLANNING

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Financial planning services are comprehensive in scope and require multiple in person and/or virtual meetings to gather information, offer input, review documents, provide written evaluations and recommendations, as well as the preparation and presentation of analytical reports and projections. The financial plan may include, but is not limited to: a net worth statement; a cash flow statement; a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans including recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations, personal and employee benefits, and other risk protection platforms such as liability coverages, income protection and long term care planning. Additionally, if authorized, it is our intention to communicate and synchronize the planning initiatives with the client's other professional advisors, including but not limited to, their accountant, attorney, or business manager.

We offer a variety of "Get-In-Gear," or GIG, programs as described in more detail below:

**The Investment Management GIG:** We are here to help you manage your investment portfolio. Your short term and long-term intentions are the core drivers of the investment strategies that we will create, implement, and monitor for you and your family. Before investing, we need to know what your goals, timelines, and objectives are, as well as your risk tolerance level.

**The Essential GIG:** This podium is designed for folks on their initial fundamental path who want to formulate a robust financial life. It's a perfect fit for those who are fresh out of college, new to the workforce, and/or someone who wants to understand the next best steps for building their wealth in a healthy manner. You will be coached to get you on track to fabricate your financial life.

**The Deluxe GIG:** For those who need complete and overarching financial services, the Deluxe GIG is the perfect fit. This program is aimed at clients who want to create an appropriate process for growing, maintaining, and protecting their wealth. The platform provides a variety of tune-ups, including but not limited to: an overview of employee benefits, confirmation of legacy planning objectives, tax planning advice, and fundamental retirement planning process.

**The Elite GIG:** This customizable program is designed for affluent individuals. Get advice about taxes, insurance and multi-generational estate planning, and the practices for protecting your wealth. Perhaps you're a business owner, you've inherited significant assets, or own several real estate properties. This program will set you up to make smarter decisions as you support your dreams and family.

**The Retirement Planning GIG:** While it is important to create and sustain financial and wealth management during one's professional career, it is extremely important to prepare for the "third act" of your life. This platform provides an extensive overview of retirement planning resources, including but not limited to: review and recommendations when applying for Social Security and/or Employer Pension plans, tax planning recommendations, Medicare, and supplement plan requirements.

**The Check-in GIG:** This program is for clients who have completed their one-year retainer with us. Now that your one-year program has ended, you want to stay on track with strengthening your financial objective. We will check in with you quarterly to confirm that you are on track with maintaining and creating the lifestyle you desire and deserve. But, if a life changing event occurs in the meantime, you can connect with us at any time.

### *The Planning Process*

When the client engages UWM for financial planning services, we require a written financial planning agreement (“FPA”) signed by the client prior to the engagement of services. The FPA outlines the services and fees the clients will incur pursuant to the FPA with UWM. As financial planning is a discovery process, situations occur wherein the client is unaware of certain financial exposures or predicaments. In the event that the client’s situation is substantially different than disclosed at the initial meeting, a revised fee may be assessed pursuant to a revised FPA. The client must approve the change of scope in advance of the additional work being performed when a fee increase is necessary.

In addition to our services, the client receives access to the e-Money platform, which allows the client access to a dashboard that provides an overview and insight into the client’s portfolio. The e-Money platform is not traditionally available to retail users, and clients gain access as part of the services we provide. Upon the end of the engaged year-long financial planning service, clients may continue to retain access to the e-Money platform in conjunction with the Investment Management GIG or Check-In GIG on-going service with UWM, which moves to a month-to-month service after the first 12 months.

UWM does not require the client use or purchase the investment management services, any of the insurance products, or other products and services offered by the associated persons of the Adviser to engage the Adviser for its financial planning services. There is an inherent conflict of interest for the Adviser whenever a financial plan recommends use of professional investment management services or the purchase of insurance products or other financial products or services. The Adviser or its associated persons may receive compensation for financial planning and the provision of investment management services and/or the sale of insurance and other products and services. The Adviser does not make any representation that these products and services are offered at the lowest available cost and the client may be able to obtain the same products or services at a lower cost from other providers. However, the client is under no obligation to accept any of the recommendations of the Advisor or use the services of the Advisor in particular.

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## **ESTATE PLANNING**

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A crucial aspect of securing your financial legacy and ensuring the smooth transition of assets to your loved ones is planning for your estate. Estate planning is a proactive and thoughtful process that involves making important decisions about your assets, healthcare preferences, and the well-being of your family. Whether you are just starting to build your estate or have accumulated substantial wealth, estate planning is essential for everyone.

## TAILORED RELATIONSHIPS

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At UWM, we offer the same suite of services to all our clients. The advisory services and recommendations offered by UWM are based on the individual needs of our clients and the suitability of products and services. Specific client financial plans and their implementation are dependent upon the client's Investment Policy Statement which outlines each client's current situation (income, objectives, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs and targets.

Clients may impose restrictions on investing in certain securities or types of securities in accordance with their values and beliefs. UWM will make every effort to comply with the wishes of the client but cannot guarantee absolute adherence due to our use of indexed products, funds, and exchange traded funds ("ETF") that are controlled by third-party service providers.

## WRAP FEE PROGRAMS

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**UWM does not participate in and is not a sponsor of wrap fee programs.**

Wrap Fee Programs are arrangements between broker-dealers, investment advisers, banks and other financial institutions, and affiliated and unaffiliated investment advisers through which the clients of such firms receive discretionary investment advisory, execution, clearing and custodial services in a "bundled" form. In exchange for these "bundled" services, the clients pay an all-inclusive (or "wrap") fee determined as a percentage of the assets held in the wrap account.

## ASSETS UNDER MANAGEMENT

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When calculating regulatory assets under management, an investment adviser must include the value of any advisory account over which it exercises continuous and regular advisory or management services. As of December 31, 2023, Urban Wealth Management reports \$ 188,957,457.00 regulatory assets under management, of which \$ 188,957,457.00 was managed on a discretionary basis and \$0.00 managed on a non- discretionary basis.

## ITEM 5: FEES AND COMPENSATION

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The following paragraphs detail the fee structure and compensation methodology for services provided by UWM. Each client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Adviser.

### INVESTMENT MANAGEMENT SERVICES

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The Adviser bases its fees on a percentage of assets under management and charges its fee monthly based on the value of the account(s) as of the last day of the previous month.

For clients who are invested **only** in a fixed income only portfolio, our fees will be no more than 0.25% annually, payable monthly in advance. For clients whose investable assets are in all other portfolio types with us, the fee schedule below applies. Where the client maintains assets with the Adviser in excess of \$500,000, financial planning services are automatically included at no additional cost.



<b>AUM (ASSETS UNDER MANAGEMENT)</b>	<b>ALL OTHER PORTFOLIOS INVESTMENT MANAGEMENT FEE</b>	<b>FINANCIAL PLANNING SERVICES</b>
\$1,000– 499,999	1.25%	N/A
\$500,000 - \$1,999,999	1.0%	Financial Planning Services Included
\$2,000,000 - \$4,999,999	.75%	
\$5,000,000- \$9,999,999	.50%	
10,000,000 - \$14,999,999	.25%	Financial Planning Services Included
\$15,000,000+	.15%	

Fees are deducted from the client account to facilitate billing as authorized by IMA. Although the IMA is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. Both client and the Adviser may terminate any of the aforementioned investment management services at their discretion upon written notice. For investment management services, clients shall be refunded on a pro rata basis for unearned advisory fees charged in advance. The portfolio value at the completion of the prior full billing month is used as the basis for the fee computation, adjusted for the number of days during the billing month prior to termination. The investment management fees are negotiable at the sole discretion of the Adviser.

In certain instances, a Sub-Advisor's fee may encompass the Adviser's management fee and the Adviser will not charge clients a separate investment management services fee.

AssetMark: Unless otherwise specified, the sub-advisory services provided by AssetMark are charged quarterly in advance based on the value of the account(s) as of the last business day of the previous quarter. Fees charged for AssetMark's sub-advisory services includes UWM's investment management services fee and clients will not be charged a separate fee by UWM for our services.

### **SUB-ADVISORY SERVICES**

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Depending on the Sub-Advisor, the annual fee may be pro-rated and paid monthly or quarterly, in advance, to the Sub-Advisor based upon the market value of the assets on the last day of the previous month or quarter as determined in accordance with the method described in the advisory agreement between the Sub-Advisor and the client. The Sub-Advisor and the Adviser may mutually agree to a lower fee for a client. When calculating the advisory fee, the first month or quarter will commence on the first calendar month or quarter after the effective date of the sub-advisory agreement. Fund investors may pay management fees (those paid to the Adviser and possibly additional fees to the Sub-Advisor) and/or fund related expenses to the adviser offering the fund.

Depending on the sub-advisor utilized, the Sub-Advisor's fee may encompass the Adviser's management fee. In these instances, the Adviser will not charge clients a separate monthly investment management

services fee as described above.

Generally, advisory fees are deducted from the client account. See the Form ADV Part 2A of the Sub-Advisor for a description of their respective fees and expenses, billing processes, termination clauses, minimum investment amounts, and any other requirements needed to invest.

Typically, the sub-advisory agreements are in effect until terminated by written notice by the Sub-Advisor or the Adviser. Some sub-advisory agreements may require the Adviser to provide the Sub-Advisor with sixty (60) days prior written notice.

## FINANCIAL PLANNING

ONE YEAR RETAINER. The fee for a financial plan is predicated upon the facts known at the start of the engagement. The financial planning services and fee is at the sole discretion of the Adviser. As noted above, financial planning services may be combined with investment management services based on the amount of assets under management. Fees for stand-alone financial planning and those combined with investment management services are set forth in the Urban Wealth Management Services Platform document. At the conclusion of the one-year retainer, client can renew their service platform or sign up for our annual check-in platform (“Check-In GIG”).

<b>Individual Program</b>	<b>Fee</b>	<b>Upfront 5% Discount</b>	<b>Set-up Fee</b>	<b>6 Month Payments</b>	<b>Outstanding Balance</b>
Essential	\$ 3,400.00	\$ 3,230.00	\$ 850.00	\$ 425.00	\$ 2,550.00
Deluxe	\$ 5,100.00	\$ 4,845.00	\$1,275.00	\$ 637.50	\$ 3,825.00
Elite	\$ 8,100.00	\$ 7,695.00	\$2,025.00	\$ 1,012.50	\$ 6,075.00
Retirement	\$ 3,600.00	\$ 3,420.00	\$ 900.00	\$ 450.00	\$ 2,700.00
Check-in	\$ 2,700.00	\$ 2,565.00	\$ 675.00	\$ 337.50	\$ 2,025.00
<b>Couples/Family Program</b>	<b>Fee</b>	<b>Upfront 5% Discount</b>	<b>Set-up Fee</b>	<b>6 Month Payments</b>	<b>Outstanding Balance</b>
Essential	\$ 4,400.00	\$ 4,180.00	\$1,100.00	\$ 550.00	\$ 3,300.00
Deluxe	\$ 6,400.00	\$ 6,080.00	\$1,600.00	\$ 800.00	\$ 4,800.00
Elite	\$10,600.00	\$ 10,070.00	\$2,650.00	\$ 1,325.00	\$ 7,950.00
Retirement	\$ 5,100.00	\$ 4,845.00	\$1,275.00	\$ 637.50	\$ 3,825.00
Check-in	\$ 3,600.00	\$ 3,420.00	\$ 900.00	\$ 450.00	\$ 2,700.00

Financial Planning fees are directly invoiced to the client and are payable by through ChargeZoom. The client may request to remit the payment via check. Checks shall be made payable to Urban Wealth Management Group. Four of our five core Financial Planning services (Essential GIG, Deluxe GIG, Elite GIG and Retirement Planning GIG), have two payment options – an annual payment or monthly payment. Clients who choose the annual payment option will be provided a 5% discount. For monthly payment options, 25% is payable upfront to cover setup and onboarding for the client. The remaining balance is payable over six months.

Our fifth core Financial Planning services (Check-in GIG) also has two payment options – an annual payment or monthly payment. Clients who choose the annual payment option will be provided a 5% discount. For monthly payment options, the annual fee is prorated and payable in twelve equal monthly installments.

For financial planning services, the client must notify the Adviser in writing 30 days prior to termination. Unearned at the time termination becomes effective (if any), will be refunded based on the prorated amount of work completed at the point of termination. Refunds will be paid to the client via check. Access to the e-Money platform will be terminated at the end of the 30-day period.

For those clients in our Check-In GIG program, services can be terminated immediately with thirty-days written notice.

The Adviser reserves the right to terminate any financial planning engagement where a client has willfully concealed or has refused to provide, in the Adviser's judgment, pertinent information about financial situations when necessary and appropriate to providing proper financial advice.

## **ESTATE PLANNING**

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The rate for creating a Trust is \$1,800. The rate for updating a Trust is \$500. Fees are directly invoiced to the client and are paid in advance. Fees are payable through ChargeZoom.

## **OTHER FEES**

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There may be additional fees or charges that result from the maintenance of or trading within a client's account. These are fees that are imposed by third parties in connection with investments made through a client's account, such as custodial and investment fees. In addition to our advisory fees, clients are responsible for paying fees associated with investing their accounts. Please note that Charles Schwab & Co., Inc. ("Schwab") and AssetMark do not charge transaction fees for U.S. listed equities and exchange traded funds.

Clients may also pay holdings charges imposed by the custodian for certain investments, charges imposed directly by a mutual fund, index fund, or exchange traded fund, which shall be disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), distribution fees, surrender charges, variable annuity fees, IRA and qualified retirement plan fees, mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from custodian, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. UWM does not receive any portion of these fees.

## **OTHER COMPENSATION**

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For commissions related to insurance products, such as life, disability and long-term care, such commissions are paid to UWM's affiliate insurance agency, UWM Insurance Services, LLC, and compensation is made to the adviser in their capacity as an insurance agent. Similar services are available through other unaffiliated entities and agents.

Compensation earned by these Investment Advisor Representatives in their separate capacities as registered representatives and/or licensed insurance agents is separate and in addition to our advisory fees. These practices present a conflict of interest because Investment Advisor Representatives of our firm who are registered representatives and/or licensed insurance agents may have a financial incentive to effect securities transactions on your behalf and/or sell insurance products to you. In efforts to mitigate any conflicts of interest, it is UWM's strict policy that UWM and our Investment Advisor Representatives act in our client's best interests. Clients are under no obligation to purchase securities and/or insurance products

through any person affiliated with UWM.

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## **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

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### **PERFORMANCE BASED COMPENSATION**

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#### **UWM does not assess Performance Fees.**

Performance-Based Fees (“Performance Fees”) are based on a share of the capital gains or capital appreciation of the assets of a client. The fees we charge are as described in Item 5 and are not based upon the capital appreciation of the client’s funds or securities. However, the Adviser may employ certain types of investments that do charge a performance fee in which the Adviser does not participate. For these investments, please refer to their offering or private placement memorandum for an explanation and amounts of the performance fees.

### **SIDE-BY-SIDE MANAGEMENT**

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#### **UWM does not provide Side-By-Side Management.**

“Side-by-Side Management” refers to a situation in which the same adviser manages accounts that are billed based only on a percentage of assets under management and at the same time manages other accounts for which fees are performance-based.

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## **ITEM 7: TYPES OF CLIENTS**

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The Adviser generally provides investment advice to individuals, pension and profit-sharing plans, trusts, estates, or charitable organizations, corporations, and business entities. Client relationships vary in scope and length of service. The Adviser does not have a minimum account size requirement.

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## **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS**

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### **METHODS OF ANALYSIS**

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UWM uses the varying methods of analysis identified below to determine the proper investment strategy for each client. Our strategies are heavily based on each client’s personal circumstances, financial goals, and their risk tolerance. We utilize a blend of strategic approaches and strategies that enable us to allocate client assets by liquidity and time horizon:

***Fundamental Analysis*** concentrates on factors that determine a company’s value and expected future earnings. It involves analyzing its financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives: to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions and to calculate its credit risk. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

**Technical Analysis** is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume, and open interest can help predict future (usually short-term) market trends. It attempts to predict a future stock price or direction based on market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall. Technical analysis methods employ software and other financial data management tools to assess various aspects of the marketplace. The risk is that markets do not always follow patterns and relying solely on this method may not work long term.

**Cyclical Analysis** assumes that markets react in cyclical patterns which, once identified, can be leveraged to provide performance. Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class, or an individual company's profits. Cyclical analysis is a time-based assessment which incorporates past and present performance to determine future value. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. The risks of this strategy are two-fold: (1) the markets do not always repeat cyclical patterns; and (2) if too many investors begin to implement this strategy, it changes the very cycles of which they are trying to take advantage.

## **INVESTMENT STRATEGIES**

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Strategies may include long-term purchases, short-term purchases, and asset allocation models.

The primary investment strategy used on client accounts is strategic asset allocation utilizing a core and satellite approach. This means that we use passively managed index and exchange-traded funds as the core investments, and then add actively managed funds or individual securities where there are greater opportunities to make a difference. Portfolios are globally diversified to control the risk associated with traditional markets. The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement that documents their objectives and their desired investment strategy. The Adviser's strategies do not involve frequent trading.

## **RISKS OF LOSS**

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***Clients need to be aware that investing in securities involves risk of loss of the principal.***

Every method of analysis has its own inherent risks. To perform an accurate market analysis, the Adviser must have access to current/new market information. The Adviser has no control over the dissemination

rate of market information; therefore, certain analyses may be compiled with outdated market information, severely limiting the value of the Adviser's analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by the Adviser) will be profitable or equal any specific performance level(s). The Adviser does not represent, warrant, or imply that its services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. Notwithstanding the Adviser's method of analysis or investment strategy, the assets within the client's portfolio are subject to the risk of devaluation or loss. The client should be aware that many different events can affect the value of the client's assets or portfolio including, but not limited to, changes in the financial status of companies, market fluctuations, changes in exchange rates, trading suspensions and delays, economic reports, and natural disasters.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

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#### MARKET RISKS

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**Market Volatility:** The profitability of the Adviser substantially depends upon it correctly assessing the future price movements of stocks, bonds, options on stocks, and other securities and the movements of interest rates. The Adviser cannot guarantee that it will be successful in accurately predicting price and interest rate movements.

**Material Non-Public Information:** By reason of their responsibilities in connection with other activities of the Adviser and/or its affiliates, certain principals or employees of the Adviser and/or its affiliates may acquire confidential or material non-public information or be restricted from initiating transactions in certain securities. The Adviser will not be free to act upon any such information. Due to these restrictions, the Adviser may not be able to initiate a transaction that it otherwise might have initiated and may not be able to sell an investment that it otherwise might have sold.

**Investments in Undervalued Securities:** The Adviser intends to invest in undervalued securities. The identification of investment opportunities in undervalued securities is a difficult task, and there are no assurances that such opportunities will be successfully recognized or acquired. While investments in undervalued securities offer the opportunities for above-average capital appreciation, these investments involve a high degree of financial risk and can result in substantial losses. Returns generated from the Adviser's investments may not adequately compensate for the business and financial risks assumed.

**Market or Interest Rate Risk:** The price of most fixed income securities moves in the opposite direction of the change in interest rates. For example, as interest rates rise, the price of fixed income securities falls. If the Adviser holds a fixed income security to maturity, the change in its price before maturity may have little impact on the Adviser's performance; however, if the Adviser has to sell the fixed income security before the maturity date, an increase in interest rates could result in a loss to the Adviser.

***Investments in Non-U.S. Investments:*** From time to time, the Adviser may invest and trade a portion of its assets in non-U.S. securities and other assets (through ADRs and otherwise), which will give rise to risks relating to political, social, and economic developments abroad, as well as risks resulting from the differences between the regulations to which U.S. and foreign issuers and markets are subject. Such risks may include:

- Political or social instability, the seizure by foreign governments of company assets, acts of war or terrorism, withholding taxes on dividends and interest, high or confiscatory tax levels, and limitations on the use or transfer of portfolio assets.
- Enforcing legal rights in some foreign countries is difficult, costly, and slow, and there are sometimes special problems enforcing claims against foreign governments.
- Foreign securities and other assets often trade in currencies other than the U.S. dollar, and the Adviser may directly hold foreign currencies and purchase and sell foreign currencies through forward exchange contracts. Changes in currency exchange rates will affect the Adviser's net asset value, the value of dividends and interest earned, and gains and losses realized on the sale of investments. An increase in the strength of the U.S. dollar relative to these other currencies may cause the value of the Adviser's investments to decline. Some foreign currencies are particularly volatile. Foreign governments may intervene in the currency markets, causing a decline in value or liquidity of the Adviser's foreign currency holdings. If the Adviser enters forward foreign currency exchange contracts for hedging purposes, it may lose the benefits of advantageous changes in exchange rates. On the other hand, if the Adviser enters forward contracts for the purpose of increasing return, it may sustain losses.
- Non-U.S. securities, commodities and other markets may be less liquid, more volatile, and less closely supervised by the government than in the United States. Foreign countries often lack uniform accounting, auditing and financial reporting standards, and there may be less public information about the operations of issuers in such markets.

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## REGULATORY RISKS

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***Strategy Restrictions:*** Certain institutions may be restricted from directly utilizing investment strategies of the type in which the Adviser may engage. Such institutions, including entities subject to ERISA, should consult their own advisors, counsel, and accountants to determine what restrictions may apply and whether an investment in the Adviser is appropriate.

***Trading Limitations:*** For all securities, instruments and/or assets listed on an exchange, including options listed on a public exchange, the exchange generally has the right to suspend or limit trading under certain circumstances. Such suspensions or limits could render certain strategies difficult to complete or continue and subject the Adviser to loss. Also, such a suspension could render it impossible for the Adviser to liquidate positions and thereby expose the Adviser to potential losses.

***Conflicts of Interest:*** In the administration of client accounts, portfolios and financial reporting, the Adviser faces inherent conflicts of interest which are described in this brochure. Generally, the Adviser mitigates these conflicts through its Code of Ethics which provides that the client's interest is always held above that of the Adviser and its associated persons.



***Index/Tracking Error Risks:*** To the extent it is intended that a client's account track an index, the account may not match, and may vary substantially from, the index for any period of time, including as a result of an account's inability to invest in certain securities as a result of legal and compliance restrictions, regulatory limits or other restrictions applicable to the client's account and/or UWM, reputational considerations or other reasons. As an index may consist of relatively few securities or issuers, tracking error may be heightened at times when a client's account is limited by restrictions on investments that the account may make. An account that tracks an index may purchase, hold, and sell securities at times when a non-index fund would not do so. UWM does not guarantee that any tracking error targets will be achieved. Client accounts tracking an index may be negatively impacted by any errors in the index, either as a result of calculation errors, inaccurate data sources or otherwise. UWM does not guarantee the timeliness, accuracy and/or completeness of an index and UWM is not responsible for errors, omissions, or interruptions in the index.

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### SECURITY SPECIFIC RISKS

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Risk Factors relevant to specific securities utilized by UWM include:

***Liquidity:*** Liquidity is the ability to readily convert an investment into cash. Securities where there is a ready market that is traded through an exchange are generally more liquid. Securities traded over the counter or that do not have a ready market or are thinly traded are less liquid and may face material discounts in price level in a liquidation situation.

***Currency:*** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.

***Mutual Funds:*** Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond "fixed income" nature (lower risk) or stock "equity" nature.

***Equity Investments:*** Buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

***Fixed income investments:*** These investments generally pay a return on a fixed schedule, though the amount of the payments can vary. This type of investment can include corporate and government debt securities, leveraged loans, high yield, and investment grade debt and structured products, such as mortgage and other asset-backed securities, although individual bonds may be the best-known type of fixed income security. In general, the fixed income market is volatile and fixed income securities carry interest rate risk. (As interest rates rise, bond prices usually fall, and vice versa. This effect is usually more pronounced for longer-term securities.) Fixed income securities also carry inflation risk, liquidity risk, call risk, and credit and default risks for both issuers and counterparties. The risk of default on treasury inflation protected/inflation linked bonds is dependent upon the U.S. Treasury defaulting (extremely unlikely); however, they carry a potential risk of losing share price value, albeit rather minimal. Risks of investing in foreign fixed income securities also include the general risk of non-U.S. investing described below.



**Exchange Traded Funds (ETFs):** An ETF is an investment fund traded on stock exchanges, similar to stocks. Investing in ETFs carries the risk of capital loss (sometimes up to a 100% loss in the case of a stock holding bankruptcy). Areas of concern include the lack of transparency in products and increasing complexity, conflicts of interest, and the possibility of inadequate regulatory compliance. Precious Metal ETFs (e.g., Gold, Silver, or Palladium Bullion backed “electronic shares” not physical metal) specifically may be negatively impacted by several unique factors, among them (1) large sales by the official sector which own a significant portion of aggregate world holdings in gold and other precious metals, (2) a significant increase in hedging activities by producers of gold or other precious metals, (3) a significant change in the attitude of speculators and investors.

**Annuities:** A retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments and to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

**Non-U.S. securities:** These investments present certain risks such as currency fluctuation, political and economic change, social unrest, changes in government regulation, differences in accounting and the lesser degree of accurate public information available.

While this information provides a synopsis of the events that may affect a client’s investments, this listing is not exhaustive. Although the Adviser’s methods of analysis and investment strategies do not present any significant or unusual risks, all investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Clients should understand that there are inherent risks associated with investing and depending on the risk occurrence; clients may suffer LOSS OF ALL OR PART OF THE CLIENT’S PRINCIPAL INVESTMENT.

#### **RECOMMENDATION OF SPECIFIC TYPES OF SECURITIES**

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The Adviser does not primarily recommend a particular type of security. Investments may include, but are not limited to, exchange listed securities, fixed-income securities, over-the-counter securities, foreign securities, options, alternative investments, bonds, derivatives, money market funds, real estate investment funds (“REITs”) and other pooled investment vehicles, such as open and closed end mutual funds or ETFs.

#### **ITEM 9: DISCIPLINARY INFORMATION**

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Registered investment advisors are required to disclose any legal or disciplinary events that are material to a client’s or prospective client’s evaluation of our advisory business or the integrity of the management of our firm.

**Neither UWM nor any of its management persons have been involved in legal or disciplinary events that are related to past or present investment clients.** Our backgrounds are available on the Investment

Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching our firm name or our CRD No. 285633.

#### **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

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In the interest of promoting fair, equitable, and ethical principles as a registered investment advisor, we are required to disclose when UWM, our representatives or any of our employees may have any material conflicts of interests which may impair the rendering of unbiased and objective advice. Any known and potential material conflicts of interest that may impair the client advisory relationship are reasonably disclosed in this Firm Brochure. Should you have any additional questions or concerns, please contact Lily Huber, Chief Operating Officer & Chief Compliance Officer at (424) 277-2260 or [lily.huber@urbanwm.com](mailto:lily.huber@urbanwm.com).

#### **FINANCIAL INDUSTRY ACTIVITIES**

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The Adviser is not a registered broker-dealer and does not have an application pending to register as a broker-dealer.

#### **FINANCIAL INDUSTRY AFFILIATIONS**

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The Adviser is not a registered Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor and does not have an application pending to register as such. Furthermore, UWM's management and supervised persons are not registered as and do not have an applications pending to register as an associated person of the foregoing entities.

#### **OTHER MATERIAL RELATIONSHIPS**

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#### **INSURANCE COMPANY/AGENCY AFFILIATIONS (UWM INSURANCE SERVICES, LLC)**

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UWM's affiliate, UWM Insurance Services, LLC ("UWM Insurance") is an insurance agency. Ms. Nourse and other investment advisors of UWM, in their capacity as insurance agents with UWM Insurance and/or other insurance companies may engage in insurance product sales with clients, for which they will receive additional compensation. Accordingly, there is a conflict of interest between UWM and its clients. Any commissions received through the sales of insurance products do not offset advisory fees the client may pay for advisory services from UWM. Clients are not required to purchase insurance products from investment advisors of UWM and may seek similar services elsewhere. UWM does not make any representation that the insurance services/products are at the lowest cost available, and clients may be able to obtain those services and/or products at a more favorable rate from other service providers.

#### **OTHER INVESTMENT ADVISORS**

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UWM does not receive additional compensation from other investment advisers that it recommends to or selects for clients. However, UWM compensates third-party advisors to provide back office and other administrative services to UWM to manage and service client accounts. Please see Item 4 and 5 for additional information regarding this arrangement.

## **ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

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### **DESCRIPTION OF CODE OF ETHICS**

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The Adviser has adopted a Code of Ethics which establishes standards of conduct for its supervised persons. The Code of Ethics includes general requirements that such supervised persons comply with their fiduciary obligations to clients and applicable securities laws, and specific requirements relating to, among other things, personal trading, insider trading, conflicts of interest, and confidentiality of client information. It requires supervised persons to report their personal securities transactions and holdings quarterly to the Adviser's CCO and requires the CCO to review those reports. It also requires supervised persons to report any violations of the Code of Ethics promptly to the Adviser's CCO. Each supervised person of the Adviser receives a copy of the Code of Ethics and any amendments to it and must acknowledge in writing having received the materials. Annually, each supervised person must certify that they complied with the Code of Ethics during that year. Clients and prospective clients may obtain a copy of the Adviser's Code of Ethics by contacting the CCO of the Adviser.

### **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS**

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UWM does not recommend or effect transactions in securities in which any related person may have material financial interest.

### **PROPRIETARY/SIMULTANEOUS TRADING**

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At times, the Adviser or its affiliated persons may buy or sell securities for its own accounts that it has also recommended to clients. However, any purchase or sale of a security by the Adviser or a related person will be subject to the Adviser's fiduciary duty to client accounts. From time to time, representatives of the Adviser may buy or sell securities for themselves at or around the same time as the Adviser's client accounts. In any instance where similar securities are bought or sold, the Adviser will uphold its fiduciary duty by always transacting on behalf of the client before transacting for its own benefit. The Adviser will always document any transactions that could be construed as conflicts of interest. To mitigate or remedy any conflicts of interest or perceived conflicts of interest, the Adviser's CCO will monitor its proprietary and personal trading reports for adherence to its Code of Ethics. At no time will the Adviser, or any affiliated persons of the Adviser, transact in any security to the detriment of any client.

## **ITEM 12: CUSTODIAN PRACTICES**

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### **SELECTION AND RECOMMENDATION**

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The Adviser seeks to recommend a custodian who will hold client assets and execute transactions on terms that, overall, are most advantageous when compared to other available providers and their services.

We consider a wide range of factors in selecting a custodian including, among others, the following:

- ✓ Timeliness of execution
- ✓ Clearance and settlement capabilities

- ✓ Ability to place trades in difficult market environments
- ✓ Timeliness and accuracy of trade confirmations
- ✓ Quality of account statements
- ✓ Research, execution facilitation, record keeping, custody and other “value-added” services provided
- ✓ Frequency and correction of trading errors
- ✓ Financial condition and willingness to commit capital
- ✓ Business reputation and integrity

To this end, the Adviser has established a custodian relationship with Charles Schwab & Co., Inc. (“Schwab”) and AssetMark, Inc. (“AssetMark”). Not all advisors require their clients to use a particular custodian selected by the advisor. We have determined that having Schwab or AssetMark execute trades is consistent with our duty to seek “best execution” of client trades.

## **RESEARCH AND OTHER SOFT DOLLAR BENEFITS**

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### **UWM currently receives “soft dollars.”**

Under “soft dollar” arrangements, one or more of the custodial firms would provide or pay to UWM the costs of certain services, equipment, or other items. These soft dollar benefits are attributed to the investment advisor by reducing its expenses; however, the amount of the fee paid to the investment advisor by the client would not be reduced. Making allocations to custodial businesses with soft dollar arrangements could enhance the ability to obtain research, optimal execution, and other benefits on behalf of clients.

Soft dollar benefits create a conflict of interest because we have an incentive to select or recommend a custodian based on our interest in receiving the research or other products or services rather than on our clients’ interest in receiving most favorable execution. We mitigate this risk by ensuring that our clients receive best execution. It is the policy and practice of the Adviser to strive for the best price and execution for costs and discounts which are competitive in relation to the value of the transaction, and which comply with Section 28(e) of the Securities Exchange Act of 1934, as amended.

Schwab and AssetMark makes available to UWM products and services that benefit UWM but may not benefit our clients’ accounts. Some of these products and services assist UWM in managing and administering clients’ accounts. These benefits may include software and other technology that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts), provide research, pricing information and other market data, facilitate payment of UWM’s fees from its clients’ accounts, and assist with back-office support, recordkeeping and client reporting. Many of these services generally may be used to service all, or a substantial number of UWM’s accounts, maintained at Schwab or AssetMark. Schwab and AssetMark may also provide UWM with other services intended to help UWM manage and further develop its business enterprise. These services may include consulting, publications and presentations on practice management, information technology, business succession, regulatory compliance, and marketing. Schwab and AssetMark may make available, arrange and/or pay for, or discount/waive fees for these types of services rendered to UWM by independent third parties, for which Schwab and AssetMark would otherwise usually charge.

## **BROKERAGE FOR CLIENT REFERRALS**

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The Adviser and its associated persons do not receive client referrals from broker dealers/custodians or third parties as consideration for selecting or recommending brokers/custodians for client accounts.

## **DIRECTED BROKERAGE**

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UWM does not recommend broker dealers.

## **ORDER AGGREGATION**

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UWM may, at times, aggregate sale and purchase orders of securities (“block trading”) for advisory accounts with similar orders to obtain the best pricing averages and minimize trading costs. This practice is reasonably likely to result in administrative convenience or an overall economic benefit to the client. Clients also benefit relatively from better purchase or sale execution prices, lower commission expenses or beneficial timing of transactions or a combination of these and other factors. Aggregate orders will be allocated to client accounts in a systematic non-preferential manner. UWM may aggregate or “bunch” transactions for a client’s account with those of other clients to obtain the best execution under the circumstances.

If more than one price is paid for securities in an aggregated transaction, each client in the aggregated transaction will receive the average price paid for the block of securities in the same aggregated transaction for the day. If the Adviser is unable to fill an aggregated transaction completely, but receives a partial fill of the aggregated transaction, the Adviser will allocate the filled portion of the transaction to clients based on an equitable rotational system as follows:

- The Adviser must ensure that adequate and full disclosure of its allocation and bunching practices has been made prior to the transaction.
- All clients/investors, accounts or funds participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rata basis.
- Aggregate transactions must not be executed unless the intended and resultant aggregation is consistent with its duty to seek best execution and any terms found in the Adviser's written agreements.
- Aggregated orders filled in their entirety shall be allocated among clients/investors, accounts, or funds in accordance with an allocation statement created prior to the execution of the transaction(s); partially filled orders shall be allocated pro-rata based on the allocation statement and the variance from the modeled allocation of a security. Where this method prescribes an odd lot that is less than 100 shares for an account, the allocation will be rounded up to a whole lot. Client/investor funds held collectively for the purpose of completing the transaction may not be held in this commingled manner for any longer than is practical to settle the transaction.
- Each client/investor, account, or fund that participates in an aggregated order will participate at the average share price for all the Adviser’s transactions in that security on a given business day, with transaction costs shared pro-rata based on each client/investor’s, account’s, or fund's participation in the transaction.
- Investments resulting from any aggregated order must be consistent with the specific investment objective(s) of each client/investor, account or fund as detailed in any written agreements. No additional compensation shall result from the proposed allocation. No client/investor, account or fund will be favored over any other client/investor, account, or fund as a result of the allocation.

- Pre-allocation statement(s) specifying the participating client/investor accounts and the proposed method to allocate the order among the clients/investors, accounts or funds are required prior to any allocated order. Basis for establishing pre-allocations may include pro-rata of account assets to assets for the specific strategy, executing broker and variance from modeled position holding as factors. Should the actual allocation differ from the allocation statement, such trade may only be settled with the approval of the CCO or another appropriately qualified and authorized principal of the Adviser.

## **ITEM 13: REVIEW OF ACCOUNTS**

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### **PERIODIC REVIEWS**

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Accounts are reviewed quarterly or more frequently when market conditions dictate. Account reviews are performed by the Investment Adviser Representative responsible for the client. They are tasked with considering the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client. Frequency of review of financial plans differ depending on the financial planning services the client selects. Clients are advised to notify the Adviser promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

### **INTERMITTENT REVIEW FACTORS**

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Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or changes in the client's financial status (such as retirement, termination of employment, relocation, inheritance, etc.). Clients are advised to notify UWM promptly if there are any material changes in their financial situation, investment objectives, or in the event they wish to place restrictions on their account.

### **REPORTS**

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Clients receive periodic reports generated by the custodian and/or the Sub-Advisor on at least a quarterly basis. The written reports may include account valuation, performance stated in dollars and as a percent, net worth statement, portfolio statement, and a summary of objectives and progress towards meeting those objectives. Clients receive statements of account positions no less than quarterly from the account custodian.

## **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

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### **ECONOMIC BENEFITS FROM OTHERS**

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As disclosed under Item 12, above, we receive an economic benefit from our preferred qualified custodians in the form of support products and services they make available to us and other investment advisors whose clients maintain their accounts with them. These products and services, how they benefit us, and the related conflicts of interest are described above under Item 12. As part of our fiduciary duty to clients, we endeavor to put the interests of our clients first, at all times. The availability of these products and services is not based on us giving particular investment advice to our clients. Clients should be aware, however, that the receipt of economic benefits by UWM or its related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of Schwab and AssetMark for custody services.

## COMPENSATION TO UNAFFILIATED THIRD PARTIES

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UWM does not compensate, directly or indirectly, any person who is not a supervised person for client referrals.

## ITEM 15: CUSTODY

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### CUSTODIAN OF ASSETS

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Custody means holding, directly or indirectly, client funds or securities, or having any authority to obtain possession of them.

UWM does not accept or permit the Adviser or its associated persons from obtaining custody of client assets including cash, securities, acting as trustee, providing bill paying service, having password access to control account activity, or any other form of controlling client assets. All checks or wire transfer to fund client accounts are required to be made out to/sent to the account custodian.

UWM has custody due to its authority to deduct advisory fees from client accounts and because it can, subject to a standing letter of authorization, dispose of client funds or securities. However, UWM will not maintain physical possession of client funds and securities. Rather, client's funds and securities are held by a qualified custodian in accounts that are registered in the client's name.

While UWM does not have physical custody of client funds or securities, payments of UWM's fees may be deducted by the custodian from the custodial brokerage account(s) which holds the client's funds pursuant to the client's account application. Prior to permitting the direct debiting of fees, each client must provide written authorization permitting fees to be paid directly from the custodian to UWM. In the event that the Adviser's custodial agreement enables the Adviser to withdraw, or transfer, client funds or securities upon instruction to the custodian it conflicts with the Adviser's IMA. The CCO of the Adviser reviews money handling activities of UWM to ensure that custody of client funds is not exercised beyond what is provided for in the IMA irrespective to the terms of the Adviser's custodial agreement(s).

From time to time, UWM may receive standing letters of authorization from a client ("SLOA") whereby the client instructs its custodian to accept instruction from UWM to direct funds from the client's account to specific accounts of the client ("First Party SLOA") or to third parties unrelated to UWM and its investment adviser representatives ("Third Party SLOA"). UWM will review each SLOA prior to acceptance to ensure it meets these requirements. It will also periodically review the SLOAs it has from clients to ensure it meets these criteria.

**First Party Standing Letters of Authorization.** Under applicable SEC guidance, UWM may accept First Party SLOAs without being deemed to have custody if the First Party SLOAs meet the following criteria:

- (a) It is authorized by the client.
- (b) A copy of the authorization is provided to the qualified custodians.
- (c) It clearly specifies the name and account numbers (including ABA routing numbers) on the sending and receiving accounts and the qualified custodian holding each of those accounts.



- (d) It identifies the accounts as belonging to the client.

**Third-Party Standing Letters of Authorization.** In the case of Third-Party SLOAs, UWM may be deemed to have custody of such client's funds under applicable federal law. Under applicable SEC guidance, UWM may accept such custody without the requirement to obtain an annual surprise audit examination if the SLOAs meet the criteria set forth below.

- (a) The Client provides an instruction to the qualified custodian, in writing, which includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- (b) The client authorizes UWM, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- (c) The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization and provides a transfer of funds notice to the client promptly after each transfer.
- (d) The client has the ability to terminate or change the instruction to the client's qualified custodian.
- (e) UWM and its investment adviser representatives have no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- (f) UWM maintains records showing that the third party is not a related party of the investment advisor or located at the same address as the investment advisor.
- (g) The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

## ACCOUNT STATEMENTS

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Although Adviser is the client's adviser, the client's statements will be mailed or made available electronically by the custodian. The custodian will provide account statements not less than quarterly to clients at their address of record. When the client receives these statements, they should be reviewed carefully. Clients should compare asset values, holdings, and fees on the statement to that in the account statement issued the previous period.

## ITEM 16: INVESTMENT DISCRETION

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It is our customary procedure to have full discretionary authority in order to supervise and direct the investments of our clients' accounts. This authority is for the purpose of making and implementing investment decisions, without the client's prior consultation. All investment decisions are made in accordance with the client's stated investment objectives. Clients grant discretionary authority to the Adviser by completing the following items:

- Execution of UWM's investment management agreement and/or by a separate limited power of attorney which designates the authority for us to place trades on your behalf.



- Provide UWM with discretionary authority on the new account forms that are submitted to custodian acting for the client's account(s).

Other than advisory fees due to UWM, which UWM will receive directly from the custodian, UWM's discretionary authority does not grant us the authority to take or have possession of any assets in the client's account or to direct delivery of any securities or payment of any funds held in the account to UWM.

Furthermore, UWM's discretionary authority by agreement does not allow it to direct the disposition of such securities or funds to anyone except the account owner.

Clients may impose reasonable restrictions on investing in certain securities or types of securities in accordance with their values and beliefs, in writing. UWM will make every effort to comply with the wishes of the client but cannot guarantee absolute adherence due to our use of indexed products, funds, and ETFs that are controlled by third-party managers. Certain portfolio programs require that we be able to invest in mutual funds and ETFs at our discretion and we are unable to allow for any limitation on this discretion.

The Adviser will consult with the client where discretion is not obtained prior to each trade in order to obtain client approval for the transaction(s). The client authorizes the discretion to select the custodian to be used and the commission rates paid to the Adviser. The Adviser does not receive any portion of the transaction fees or commissions paid by the client to the custodian on certain trades.

#### **ITEM 17: VOTING CLIENT SECURITIES**

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The Adviser will not vote nor advise clients how to vote proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. For accounts subject to the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), the plan fiduciary specifically keeps the authority and responsibility for the voting of any proxies for securities held in plan accounts. The Adviser will promptly pass along any proxy voting information to the clients or their representatives.

##### *Class Action Lawsuits*

From time to time, securities held in the accounts of clients will be the subject of class action lawsuits. The Adviser has no obligation to determine if securities held by the client are subject to a pending or resolved class action lawsuit. The Adviser also has no duty to evaluate a client's eligibility or to submit a claim to participate in the proceeds of a securities class action settlement or verdict. Furthermore, the Adviser has no obligation or responsibility to initiate litigation to recover damages on behalf of clients who may have been injured as a result of actions, misconduct or negligence by corporate management of issuers whose securities are held by clients.

Where the Adviser receives written or electronic notice of a class action lawsuit, settlement or verdict affecting securities owned by a client, we will forward all notices, proof of claim forms and other materials, to the client. For clients who have authorized electronic communication from the Adviser, we will forward the notices, proof of claim forms and other materials to the client via electronic mail, where appropriate.

The Sub-Advisors may have different proxy voting policies. For information on their policies, please see their respective disclosure brochures.

## **ITEM 18: FINANCIAL INFORMATION**

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### **BALANCE SHEET REQUIREMENT**

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The Adviser is not required to provide a balance sheet as it does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, six months or more in advance.

### **FINANCIAL CONDITION**

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The Adviser does not have any financial conditions that would reasonably impair our ability to meet contractual commitments to clients.

### **BANKRUPTCY PETITION**

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The Adviser meets all net capital requirements that it is subject to, and the Adviser has not been the subject of a bankruptcy petition in the last 10 years.

## INFORMATION SECURITY PROGRAM

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### INFORMATION SECURITY

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The Adviser maintains an information security program to reduce the risk that your personal and confidential information may be breached.

### PRIVACY POLICY

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Below is a summary of the Adviser's Privacy Policy regarding client personal information. A complete version of the Privacy Policy is contained in your client advisory agreement and may be obtained by contacting the Compliance Officer of the Adviser.

Urban Wealth Management:

- a) Collects non-public personal information about its clients from the following sources:
  - Information received from clients on applications or other forms.
  - Information about clients' transactions with the Adviser, its affiliates, and others.
  - Information received from our correspondent clearing broker with respect to client accounts.
  - Medical information submitted as part of an insurance application for a traditional life or variable life policy; and
  - Information received from service bureaus or other third parties.
- b) The Adviser will not share such information with any affiliated or nonaffiliated third party except:
  - When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians.
  - When required to maintain or service a customer account.
  - To resolve customer disputes or inquiries.
  - With persons acting in a fiduciary or representative capacity on behalf of the customer.
  - With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants, and auditors of the firm.
  - In connection with a sale or merger of The Adviser's business.
  - To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability.
  - To comply with federal, state, or local laws, rules and other applicable legal requirements.
  - In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement.
  - In any circumstances with the customer's instruction or consent.
- c) Restricts access to confidential client information to individuals who are authorized to have access to confidential client information and need to know that information to provide services to clients.
- d) Maintains physical, electronic, and procedural security measures that comply with applicable state and federal regulations to safeguard confidential client information.

## **BUSINESS CONTINUITY PLAN**

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The Adviser has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services, or key people.

### **DISASTERS**

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The Business Continuity Plan covers natural disasters such as earthquakes, snowstorms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications, line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

### **ALTERNATE OFFICES**

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Alternate offices (including the personal residences of investment adviser representatives) are identified to support ongoing operations in the event the main office is unavailable. Such locations may not necessarily be used for meeting clients. It is our intention to contact all clients within five days of a disaster that dictates moving our office to an alternate location.

### **SUMMARY OF BUSINESS CONTINUITY PLAN**

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A summary of the business continuity plan is available upon request to the Adviser's Chief Compliance Officer.



**URBAN WEALTH  
MANAGEMENT GROUP, LLC**

**FORM ADV PART 2B**

**BROCHURE SUPPLEMENT**

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**RENÉ ANNISE NOURSE, CFP®**

FOUNDER/CEO, WEALTH ADVISOR

INDIVIDUAL CRD No. 1006530

Phone : (424) 277-2260

Fax : (424) 277-5524

Email : [rene.nourse@urbanwm.com](mailto:rene.nourse@urbanwm.com)

Website : [www.urbanwm.com](http://www.urbanwm.com)

Address: 841 Apollo Street, Ste. 320, El Segundo, CA 90245

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This brochure supplement (“Supplement Brochure”) dated March 28, 2024, provides information about René A. Nourse that supplements Urban Wealth Management Group, LLC’s (“UWM” or the “Adviser”) Form ADV Part 2A (“Brochure”). You should have received a copy of the Brochure. If you did not receive UWM’s Brochure or if you have any questions about the contents of this Supplement Brochure, please contact us by telephone at (424) 277-2260 or by email at [info@urbanwm.com](mailto:info@urbanwm.com)

Additional information about René A. Nourse is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site is searchable by a unique identifying number known as a CRD number. René A. Nourse’s CRD number is 1006530.

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**ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE**

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**René Annise Nourse****CRD No. 1006530****Born: 1954**

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**EDUCATIONAL BACKGROUND**

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1976 – Oberlin College, Bachelor of Arts – Psychology

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**BUSINESS EXPERIENCE**

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10/2017 – Present	Founder/CEO, Insurance Advisor	UWM Insurance Services, LLC
05/2017 – Present	Wealth Advisor	Urban Wealth Management Group, LLC
06/2012 – Present	Founder/CEO	Urban Wealth Management Group, LLC
11/2018- 12/2022	Registered Representative	Trutoro/Veritas
06/2012 – 06/2017	Investment Advisor Representative;	CONCERT Wealth Management Group, Inc., dba Urban Wealth Management
06/2012 – 09/2018	Registered Associate/Representative	Purshe Kaplan Sterling Investments
06/2009 – 06/2012	Registered Representative	Morgan Stanley Smith Barney
09/2000 – 06/2009	Registered Representative	Citigroup Global Markets Inc. - Smith Barney
05/1993 – 09/2000	Registered Representative	Prudential Securities Inc.
11/1985 – 05/1993	Registered Representative	Dean Witter Reynolds Inc.

State Securities Law Exam

Series 63 – Uniform Securities Agent State Law Examination

Series 65 – Uniform Investment Adviser Law Examination

General Industry/Products Exam

Series 6 – Investment Company Products/Variable Contracts Representative Examination

Series 7 – General Securities Representative Examination

Insurance Licenses

California Insurance License No. 0571752

Certified Financial Planner (CFP®)

To receive the CFP designation from the Certified Financial Planner Board of Standards, Inc., you must successfully complete four components: education, examination, experience, and ethics.

1. *Education*- The two-part education requirement includes both (1) completing coursework on financial planning through a CFP Board Registered Program, and (2) holding a bachelor's degree or higher (in any discipline) from an accredited college or university. You must complete the coursework before you can take the CFP® exam. You have 5 years from the date you pass the CFP® exam to complete the bachelor's degree requirement.
2. *Examination*- Passing the CFP® exam demonstrates that you have attained the knowledge and competency necessary to provide comprehensive personal financial planning advice. The CFP® exam is a 170-question, multiple-choice test that consists of two 3-hour sessions over one day. The exam includes stand-alone and scenario-based questions, as well as questions associated with case studies.
3. *Experience*- The experience requirement prepares you to provide personal financial planning to the public without supervision. You can fulfill the experience requirement either before or after you take the exam. You need to complete either 6,000 hours of professional experience related to the financial planning process, or 4,000 hours of apprenticeship experience that meets additional requirements.
4. *Ethics*- The ethics requirement is the final step. It indicates you have agreed to adhere to high ethical and professional standards for the practice of financial planning, and to act as a fiduciary when providing financial advice to your client, always putting their best interests first.

### **ITEM 3: DISCIPLINARY INFORMATION**

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As it relates to past, current, or prospective clients, René Nourse has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or planning to file a bankruptcy petition.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

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René Nourse is also an insurance agent appointed with various insurance companies and is owner of UWM Insurance Services, LLC and is compensated for insurance related business through this related entity. In these capacities Ms. Nourse may recommend insurance, advisory, or other products, and receive commissions and other compensation if products are purchased through any firms with which Ms. Nourse is affiliated. Thus, a potential conflict of interest may exist between the interests of Ms. Nourse and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of Ms. Nourse or effect any transactions if they decide to follow the recommendations.

### **ITEM 5: ADDITIONAL COMPENSATION**

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In the course of business René Nourse does not receive economic benefit from non-clients for providing advisory services.

### **ITEM 6: SUPERVISION**

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René Nourse is self-supervised as she is the only Principal of the Adviser. Records of her activities are recorded in the books and records and client relationship management system of the Adviser.





**URBAN WEALTH  
MANAGEMENT GROUP, LLC**

**FORM ADV PART 2B**

**BROCHURE SUPPLEMENT**

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**MELANIE PERRY, CFP®**

FINANCIAL ADVISOR

INDIVIDUAL CRD NO. 3186552

Phone : (424) 282-3170

Fax : (424) 277-5524

Email : [melanie.perry@urbanwm.com](mailto:melanie.perry@urbanwm.com)

Website : [www.urbanwm.com](http://www.urbanwm.com)

Address: 841 Apollo Street, Ste. 320, El Segundo, CA 90245

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This brochure supplement (“Supplement Brochure”) dated March 28, 2024, provides information about Melanie Perry that supplements Urban Wealth Management Group, LLC’s (“UWM” or the “Adviser”) Form ADV Part 2A (“Brochure”). You should have received a copy of the Brochure. If you did not receive UWM’s Brochure or if you have any questions about the contents of this Supplement Brochure, please contact us by telephone at (424) 277-2260 or by email at [info@urbanwm.com](mailto:info@urbanwm.com).

Additional information about Melanie Perry is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site is searchable by a unique identifying number known as a CRD number. Melanie Perry’s CRD number is 3186552.

## ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

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**Melanie Perry, CFP®**

**CRD No. 3186552**

**Born: 1976**

### EDUCATIONAL BACKGROUND

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1999 – UC San Diego, San Diego, CA, Bachelor of Science – Management Science

### BUSINESS EXPERIENCE

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02/2022 – Present	Insurance Agent	UWM Insurance Services, LLC
02/2022 – Present	Financial Advisor	Urban Wealth Management Group, LLC
03/2008 – 08/2012	Financial Advisor	Park Avenue Securities, LLC
07/2003 – 03/2008	Financial Advisor	AXA Advisors, LLC
05/2002 – 07/2003	Financial Advisor	MML Investors Services, INC.
03/1999 – 05/2002	Financial Advisor	Woodbury Financial Services, INC.

### PROFESSIONAL DESIGNATIONS, LICENSING & EXAMS

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#### State Securities Law Exam

Series 65 – Uniform Investment Adviser Law Examination

Series 63 - Uniform Agent State Law Examination

#### General Industry/Products Exam

Series 6 – Investment Company Products/Variable Contracts Representative Examination

Series 7 – General Securities Representative Examination

#### Insurance Licenses

California Insurance License No. 0C68670

#### CERTIFIED FINANCIAL PLANNER™ (“CFP®”)

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP® (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP® Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP® Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP® Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances.
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP® Board’s Standards of Professional Conduct, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the Code of Ethics and other parts of the Standards of Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the Standards of Professional Conduct. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements can be subject to CFP® Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

### **ITEM 3: DISCIPLINARY INFORMATION**

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As it relates to past, current or prospective clients, Melanie Perry has not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or planning to file a bankruptcy petition.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

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Melanie Perry is also a licensed insurance agent and may receive compensation according to the insurance provider's commission schedule and is compensated through UWM Insurance Services, LLC. To the extent that Melanie may recommend securities, insurance or other products and receives commissions and/or other compensation creates a conflict of interest may exist between the interests of Melanie Perry and those of the advisory clients. However, clients are under no obligation to act upon any recommendations of Melanie Perry or affect any transactions through Melanie Perry if they decide to follow the recommendations. There is no assurance that these products are recommended at the lowest price and that products from other providers may be available at a lower cost.

Melanie Perry is the Owner of Zeallionaire Enterprises, Inc, a Financial Literacy and Education company where she teaches women entrepreneurs how to create a financial foundation using a budget, building a savings and eliminate debt.

Melanie Perry is an Agent with APEX Wealth Strategies/United Financial Freedom, where she helps individuals get out of debt while using the tools and strategies provided by United Financial Freedom through Apex Wealth Strategies.

### **ITEM 5: ADDITIONAL COMPENSATION**

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In the course of business Melanie Perry does not receive economic benefit from non-clients for providing advisory services.

### **ITEM 6: SUPERVISION**

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Melanie Perry is supervised by Lily Huber as Chief Compliance Officer. She reviews Melanie Perry's work through frequent office interactions as well as remote interactions. She also reviews Melanie Perry's activities through our client relationship management system.

Lily Huber' contact information: Telephone:

(424) 277-2260

Email: lily.huber@urbanwm.com



**URBAN WEALTH  
MANAGEMENT GROUP, LLC**

**FORM ADV PART 2B**

**BROCHURE SUPPLEMENT**

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**APRIL LYNN CHARLES**

Sr. REGISTERED ASSOCIATE  
INDIVIDUAL CRD NO. 4156837

Phone : (424) 277-2260  
Email : [april.charles@urbanwm.com](mailto:april.charles@urbanwm.com)

Fax : (424) 277-5524  
Website : [www.urbanwm.com](http://www.urbanwm.com)

Address: 841 Apollo Street, Ste. 320, El Segundo, CA 90245

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This brochure supplement (“Supplement Brochure”) dated March 28, 2024, provides information about April L. Charles that supplements Urban Wealth Management Group, LLC’s (“UWM” or the “Adviser”) Form ADV Part 2A (“Brochure”). You should have received a copy of the Brochure. If you did not receive UWM’s Brochure or if you have any questions about the contents of this Supplement Brochure, please contact us by telephone at (424) 277-2260 or by email at [info@urbanwm.com](mailto:info@urbanwm.com).

Additional information about April L. Charles is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site is searchable by a unique identifying number known as a CRD number. April L. Charles’ CRD number is 4156837.

## ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

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**April Lynn Charles**

**CRD No. 4156837**

**Born: 1972**

### EDUCATIONAL BACKGROUND

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Formal Education after High School – Long Beach City College, Business Administration

### BUSINESS EXPERIENCE

05/2017 – Present	Sr. Registered Associate	Urban Wealth Management Group, LLC
01/2019 – 12/2022	Sr. Registered Associate	Trutoro/Veritas
06/2012 – 06/2017	Sr. Registered Associate	CONCERT Wealth Management, Inc., dba Urban Wealth Management,
06/2012 – 09/2018	Registered Representative	Purshe Kaplan Sterling Investments
06/2009 – 06/2012	Registered Associate	Morgan Stanley Smith Barney
09/2000 – 06/2009	Registered Associate	Citigroup Global Markets Inc. – Smith Barney
05/2000 – 09/2000	Registered Associate	Prudential Securities Inc.

### PROFESSIONAL DESIGNATIONS, LICENSING & EXAMS

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#### State Securities Law Exam

Series 66 – Uniform Combined State Law Examination

#### General Industry/Products Exam

Series 7 – General Securities Representative Examination

## ITEM 3: DISCIPLINARY INFORMATION

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As it relates to past, current or prospective clients, April Charles not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or planning to file a bankruptcy petition.

#### **ITEM 4: OTHER BUSINESS ACTIVITIES**

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April Charles is not engaged in any investment-related business or occupation (other than this advisory firm).

#### **ITEM 5: ADDITIONAL COMPENSATION**

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In the course of business April Charles does not receive economic benefit from non-clients for providing advisory services.

#### **ITEM 6: SUPERVISION**

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April Charles is supervised by Lily Huber as Chief Compliance Officer. She reviews April Charles's work through frequent office interactions as well as remote interactions. She also reviews April Charles's activities through our client relationship management system.

Lily Huber's contact information: Telephone:

(424) 277-2260

Email: [lily.huber@urbanwm.com](mailto:lily.huber@urbanwm.com)



**URBAN WEALTH  
MANAGEMENT GROUP, LLC**  
**FORM ADV PART 2B**  
**BROCHURE SUPPLEMENT**

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**ROXANA E SOLORZANO**

INVESTMENT ADVISER  
REPRESENTATIVE  
INDIVIDUAL CRD No. 2666880

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This brochure supplement (“Supplement Brochure”) dated March 28, 2024, provides information about Roxana E Solorzano that supplements Urban Wealth Management Group, LLC’s (“UWM” or the “Adviser”) Form ADV Part 2A (“Brochure”). You should have received a copy of the Brochure. If you did not receive UWM’s Brochure or if you have any questions about the contents of this Supplement Brochure, please contact us by telephone at (424) 277-2260 or by email at [info@urbanwm.com](mailto:info@urbanwm.com).

Additional information about Roxana E Solorzano is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The site is searchable by a unique identifying number known as a CRD number. Roxana E Solorzano’s CRD number is 2666880.



## ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

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**Roxana E Solorzano**

**CRD No. 2666880**

**Born: 1974**

### EDUCATIONAL BACKGROUND

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Bachelor Political Science / Business Administration, UCLA - 1997

### BUSINESS EXPERIENCE

07/2023– Present	Investment Adviser Representative	Urban Wealth Management Group, LLC
12/2016 - Present	Owner, Certified Tax Preparer	Legacy Wealth Partners (DBA)
05/2018 - 07/2023	Exclusive Financial Specialist	Allstate Financial Services
12/2016 - 05/2018	Self-Employed-- Certified Tax Preparer	Legacy Wealth Group (DBA)
11/2009 - 12/2016	Financial Advisor	LPL Financial

### **ITEM 3: DISCIPLINARY INFORMATION**

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As it relates to past, current or prospective clients, Roxana E Solorzano not been involved in legal or disciplinary events, has not been involved in arbitrations, has not been subject to self-regulatory organization or administrative proceedings and has not filed or planning to file a bankruptcy petition.

### **ITEM 4: OTHER BUSINESS ACTIVITIES**

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Roxana E Solorzano is the Owner of Roxana Solorzano Tax Prep.

Roxana E Solorzano is the owns a Rental Property.

Roxana E Solorzano is a certified Tax Preparer.

### **ITEM 5: ADDITIONAL COMPENSATION**

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In the course of business Roxana E Solorzano does not receive economic benefit from non-clients for providing advisory services.

### **ITEM 6: SUPERVISION**

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Roxana E Solorzano is supervised by Lily Huber as Chief Compliance Officer. She reviews Roxana E Solorzano's work through frequent office interactions as well as remote interactions. She also reviews Roxana E Solorzano's activities through our client relationship management system.

Lily Huber's contact information: Telephone:

(424) 277-5526

Email: [lily.huber@urbanwm.com](mailto:lily.huber@urbanwm.com)