



PROTECTING CAPITAL. BUILDING WEALTH.

## Vigilare Wealth Management, LLC

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ADV Part 2A and 2B

Date of Brochure March 2020

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This brochure provides information about the qualifications and investment advisory business practices of Vigilare Wealth Management, LLC. If you have any questions about the contents of this brochure please contact us at (480) 636-8292. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about our investment advisory business is also available on the Internet at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). You can view our information on this website by searching for "Vigilare Wealth Management, LLC". You can also search using the firm's CRD number. The CRD number for our firm is 157663.

\*Registration as an investment advisor does not imply a certain level of skill or training.

## **Item 2 – Material Changes**

### **Summary of Material Changes**

The following material changes have occurred since our last update dated July 1, 2019:

Item 4 – Advisory Business: Regulatory Assets under Management.

Clients and prospective clients can always receive the most current Disclosure Brochure for Vigilare Wealth Management, LLC at any time by contacting Jason Polit at (480) 636-8292. You can also download it from the SEC Website.

We encourage you to read this document in its entirety.

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## **Item 4 – Advisory Business**

Vigilare Wealth Management, LLC is an investment advisor registered with the United States Securities and Exchange Commission (“SEC”) and is a Limited Liability Company formed under the laws of the State of Arizona.

Vigilare Wealth Management, LLC has been registered as an Investment Advisory Firm since June 7, 2011 and is jointly owned and managed by Jason S. Polit and Zeljko J. Zdrle.

The amount of clients assets managed by Vigilare Wealth Management, LLC totaled \$ 275,652,343 as of December 31, 2019. \$257,741,731 are managed on a discretionary basis and \$17,910,612 are managed on a non-discretionary basis.

### **General Description of Primary Advisory Services**

Vigilare Wealth Management, LLC is an independent fee based Registered Investment Advisor. We designed Vigilare Wealth Management, LLC with a single goal in mind: Protect and grow our clients’ wealth to the best of our ability.

### **Asset Management Services**

Our Asset Management Services are based on a dynamic asset allocation strategy. Through this service, Vigilare Wealth Management, LLC implements a customized and individualized investment program for clients by applying our investment philosophy with ongoing discretionary supervision over client accounts. This means that we will continuously monitor your account and make trades in your account when necessary. When discretionary authority is provided by the client, we will not be required to contact you prior to making investment decisions.

### **Held-Away Asset Management Services**

In an effort to provide comprehensive wealth management, we offer non-discretionary advice on held-away assets at client’s request. This service offers advice and guidance on assets held outside Vigilare Wealth Management, LLC’s primary custodians, such as employer-sponsored 401(k) & 403(b) accounts, 529 accounts, separately managed accounts, mutual funds, hedge funds, and other alternative investments held directly with the fund manager, trusts, or off-shore custodians. ByAllAccounts, a third-party platform, will provide data gathering, data normalization, and data integration into our account management platform. Our Held-Away Asset Management service will provide ongoing monitoring and guidance, and fully integrate held-away assets into the client’s total portfolio. Held-Away Asset Management services include, but are not limited to, guiding a client on security transactions and helping rebalance held-away portfolios. Held-away assets will be included in our quarterly performance and statement reporting.

### **Sub-Advisory Services by Templeton Financial Services**

We may utilize independent third-party investment advisers such as Templeton Financial Services to aid us in the implementation of investment strategies for your portfolio. In certain circumstances, we may allocate a portion of a portfolio to an independent third-party investment adviser (“separate account manager”) for separate account management based upon your individual circumstances and objectives, including, but not limited to, your account size and tax circumstances. Upon the recognition of such situations, in coordination with you, we will hire a separate account manager or enter into a tri-party agreement with you and the separate account manager for the management of those securities. These advisers shall assist our Firm in managing the day-to-day investment operations of the various allocations,

shall determine the composition of the investments comprising the allocation, shall determine what securities and other assets of the allocation will be acquired, held, disposed of or loaned in conformity with the written investment objectives, policies and restrictions and other statements of each client comprising the allocation, or as instructed by our firm.

### **General Information About Your Account**

Prior to engaging Vigilare Wealth Management, LLC to provide investment management services, the client will be required to enter into a formal investment advisory agreement setting forth the terms and conditions, including the amount of the investment management fee, under which we shall manage the client's assets. Clients will also need to enter into a separate custodial/clearing agreement with the broker/dealer and/or custodian selected by Vigilare Wealth Management, LLC.

Our discretionary asset management services will only be provided through accounts at broker/dealer(s) selected by Vigilare Wealth Management, LLC. The selected broker/dealer provide custody, clearing, and other brokerage services including regular basic statement reporting. TD Ameritrade Institutional is the preferred broker/dealer for Vigilare Wealth Management, LLC. Clients will be required to establish a brokerage account(s) through this broker/dealer for all discretionary asset management services. Vigilare Wealth Management, LLC will be granted limited power-of-attorney over all discretionary accounts in order to effect trades and, when agreed upon by the client, to deduct advisory service fees. A separate account is always maintained for each client and the client retains all rights of ownership to their accounts (e. g. right to withdraw securities or cash, exercise or delegate proxy voting, and receive transaction confirmations).

Please refer to Item 12 – Brokerage Practices for further information on Vigilare Wealth Management's relationship with TD Ameritrade Institutional.

### **Description of Investments Types**

We provide investment advice on the following types of investments.

- Exchange-listed securities (i.e. stocks and exchange traded funds)
- Securities traded over-the-counter
- Foreign issues
- Warrants
- Corporate debt securities (other than commercial paper)
- Commercial Paper and Certificates of deposit
- Municipal securities
- Mutual fund shares
- United States government securities
- Option and derivative contracts on securities, commodities, or currencies
- Interests in partnerships investing in real estate, oil and gas interests.

We may also periodically invest in leveraged ETFs. Leveraged ETF's seek a multiple of the return of a benchmark for a single day only. Leveraged ETF's are riskier than other alternatives that do not use leverage. We invest in leveraged ETF's in order to magnify the performance of an index, and thus, seek greater profits (of course, losses are magnified too). These positions will be actively monitored and rebalanced on a regular basis to maintain consistent exposure. Rebalancing does not guarantee specific future results and may result in investment losses.

We have indicated the types of investments we typically provide advice on but we reserve the right to advise clients on any other type of investment that we deem appropriate based on the client's stated goals and objectives. We may also provide advice on any type of investment held in a client's portfolio at the inception

of the advisory relationship or on any investment on which the client requests advice.

We do not provide advice on Variable Life Insurance, Variable Annuities or futures contracts on tangibles or intangibles.

Portfolios managed under our advisory services will typically be constructed using national market listed stocks, exchange traded funds, closed ended funds, individual bonds, and open ended mutual funds. We may increase cash holdings or deploy short selling strategies as deemed appropriate, based on a client's indicated tolerance for risk, our expectations of market behavior, and/or for risk management purposes.

Conflicts may arise in the allocation of investment opportunities among accounts managed. We strive to allocate investment opportunities deemed appropriate for your account(s) and other accounts advised by the firm equitably and consistent with the best interests of all accounts involved. However, there can be no assurance that a particular investment opportunity will be shared in any particular manner. If Vigilare Wealth Management, LLC obtains material, non-public information about a security or its issuer that may not lawfully be used or disclosed, we have absolutely no obligation to disclose the information to any client or use it for any client's benefit.

### **Advisory Services Tailored to Individual Needs of Clients**

Our services are provided based on the individual needs of each client. We work with each client on a one-on-one basis using interviews and data gathering forms to determine a client's investment objectives, financial resources and constraints, potential adverse tax consequences, attitudes towards market volatility, tolerance for potential market losses, and other suitability information. Clients are given the ability to request restrictions or preferences on the accounts we manage; including but not limited to, cash management needs, tax sensitivity, coordination with held-away assets, restrictions or preferences for specific companies and/or sectors.

While our advisory services are tailored to you as an individual, recommended products may use a multi-fund manager approach which makes it difficult to ensure that your portfolio will not invest in a particular industry or security. However, we are happy to discuss your preferences and will effort to accommodate them.

Clients are responsible for timely notification to Vigilare Wealth Management, LLC of any changes to their financial situation or investment objectives and if the client would like to impose and/or modify any reasonable restrictions on the management of his/her accounts.

### **Wrap Fee Programs**

We do not place client assets into a wrap fee program

## **Item 5 – Fees and Compensation**

### **Asset Management Services**

Vigilare Wealth Management, LLC has a simple fee schedule:

*Fee Schedule for Asset Management Services*  
Up to \$5 million

Maximum Annual Fee  
2%

Above \$5 million

Negotiable

The exact fee and fee arrangements may vary from that described above based on the complexity of client's situation, number of accounts managed, total assets under management, and other factors specific to the client. The asset management fee for each client will be specified in the Advisory Services Agreement executed prior to your accounts being established.

Annual fees are divided, calculated, and billed quarterly, in arrears. Fees are billed at the end of each calendar quarter. The quarterly fee is billed as a percentage of assets in the client's account. Clients may elect to designate a single account to be billed for all services. Fees will be calculated using the average daily balance. Market valuations and fee calculations will be performed by Advent Software Inc. Fees will be prorated based on the number of days that services are provided when an account is established or terminated at any time other than the beginning of a calendar quarter.

### **Held-Away Asset Management Services**

*Fee Schedule for Held-Away Assets*

Maximum Annual Fee  
2.0%

The exact fee and fee arrangements may vary from that described above based on the complexity of client's situation, number of accounts managed, total assets under management, and other factors specific to the client. The asset management fee for each client will be specified in the Advisory Services Agreement. Vigilare Wealth Management, LLC is not assuming custody of held-away assets under SEC Rule 206(4)-2. Clients will be responsible for any fees or charges imposed by custodians and/or administrators as a result of recommendations made by us on held-away assets.

Annual fees are divided, calculated, and billed quarterly, in arrears. Fees are billed at the end of each calendar quarter. The quarterly fee is billed to an account designated by the client and held by Vigilare Wealth Management's preferred broker/dealer. Fees will be calculated using the average daily balance. Market valuations and fee calculations will be performed by Advent Software Inc. in association with ByAllAccounts, LLC. Fees will be prorated based on the number of days that services are provided when an account is established or terminated at any time other than the beginning of a calendar quarter.

### **Sub-Advisory Fees**

As discussed above, there will be occasions where an independent Registered Investment Advisory firm acts as a sub-advisor to our Firm. In those circumstances, the other investment adviser manages the assets based upon the parameters provided by our firm. Our firm collects the client advisory fee and then pays out the sub advisor a portion of assets under management for such services as outlined in the Agreement between our Firm and the sub-advisor.

### **Accounts not in Asset Management Services**

We may have households in which one or more accounts are not enrolled in our Asset Management Services. Vigilare Wealth Management, LLC will accept accounts that are self-directed. These accounts will not be charged a management but clients will be responsible for all transaction costs imposed by the custodian within these accounts.

### **General Information Regarding Fees**

The fee schedules listed above are not necessarily specific to each client. Fees charged by Vigilare Wealth Management, LLC are negotiable. Negotiating factors include the total amount of assets under Vigilare Wealth Management, LLC's management, the number of accounts being managed, the degree of discretionary authority granted to Vigilare Wealth Management, LLC, the client's overall financial situation and complexity, and other conditions and factors applicable to each individual client. At Vigilare Wealth Management, LLC's sole discretion, we may waive or charge a lower fee than the standard fee arrangement.

Fees are deducted directly from client accounts when held with our primary custodian. Clients must provide the custodian with written authorization to have fees deducted from the account and be paid to Vigilare Wealth Management, LLC. The custodian will send client statements, at least quarterly, showing all disbursements for the account including the amount of the advisory fee deducted directly from the account.

Market valuations and fee calculations will be performed by Advent Software Inc. in association with ByAllAccounts, LLC. It is the responsibility of Vigilare Wealth Management, LLC and our clients to verify the accuracy of the fee calculation. Custodian(s) will not determine whether the fee has been properly calculated.

Lower or higher fees for comparable services may be available from other sources and financial professionals offering similar services.

In lieu of direct debit of accounts, clients may pay advisory fees directly to Vigilare Wealth Management, LLC via check, automated bill payment, or similar alternative service. Payment is due upon receipt of the quarterly billing statement as presented by Vigilare Wealth Management, LLC.

Broker/dealers have different account fees, execution charges and execution capabilities. Clients using the broker/dealer selected by Vigilare Wealth Management, LLC may pay higher account-related fees and execution charges than if we had selected another custodian. Vigilare Wealth Management, LLC does not have discretion over broker/dealer or custodian fees and/or commissions and the broker/dealer and/or custodians retain the right to change their fee and/or commission structure at any time. Brokerage commissions and/or transaction ticket fees charged by the qualified custodian will be billed directly to the client. Vigilare Wealth Management, LLC will not receive any portion of such commissions or fees.

In addition, clients may incur certain charges imposed by third parties other than Vigilare Wealth Management, LLC in connection with investments recommended by us. Management fees charged by Vigilare Wealth Management, LLC are separate and distinct from the fees and expenses charged by third-parties. A description of these fees and expenses will be fully disclosed to clients.

## **Item 6 – Performance-Based Fees and Side-By-Side Management**

We do not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance-based fees) nor engage in side-by-side management.

## **Item 7 – Types of Clients**

We generally provide investment advice to the following types of clients:

- Individuals



- Trusts, estates or charitable organizations
- Pension and Profit Sharing Plans

### **Minimum Investment Amounts Required**

We require a minimum initial investment of \$500,000 for establishing an Asset Management Services portfolio. The account minimums may, however, be subject to waiver or negotiation, at our sole discretion. All clients are required to execute an agreement for services prior to commencing any work.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

### **Primary Method of Analysis**

Our investment philosophy blends Macro and Micro analysis to formulate robust and fluid asset allocation strategies. Too often investment strategies fall short because of their rigidity or stubborn adherence to fixed allocations. We scrutinize a comprehensive basket of global asset classes for potential incorporation into our portfolios. We fuse together economics, sociology, politics, history, and investment analysis into our strategies. While history does not repeat there are repetitive rhymes. Human behavior really never changes and that is why secular bull markets and bear markets exist. We believe in the power of secular market cycles and seek to own the asset classes that are exhibiting strong real performance and look to avoid asset classes that have completed secular bull markets and are in long-term contraction. We combine our Macro view with extensive bottom up analysis to determine the most desirable investment to represent portfolios in each selected asset class.

Nucleus (PILR) -Our investment process starts with our core (Nucleus). Within our Nucleus we have four factors that we consider universal and timeless when evaluating the worthiness and the merits of including an asset class into our investment strategies. The four factors are (PILR):

- Price – the potential for subsequent returns in an asset class diminishes as the price moves higher and the margin for error goes up
- Interest Rates – historical and projected rates of nominal and real rates have a profound impact on how an asset is presently valued
- Liquidity – the degree to which an investment can easily be converted to cash. This can be empirically measured and we can estimate an over/undervaluation on the liquidity premium
- Risk – deviation from an expected outcome. The model is stress tested to consider the impact of highly improbable negative outcomes

World View - We incorporate an ongoing global macro-economic quantitative and qualitative analysis called our “World View”. The World View analysis is designed to help stress test our portfolios and assist in understanding investment implications given different scenarios. In the World View analysis we are not forming opinions about any specific investment; rather we are studying and analyzing the world from a political, social, economic, and historical perspective and endeavoring to understand the investment implications. This World View perspective is extremely important because it can influence the PILR inputs and help in identifying and avoiding risks that could be overlooked by a static model.

Security Analysis/Fundamental Analysis – We conduct rigorous fundamental analysis to help determine the “best tool for the job” in each asset class. Security/Fundamental analysis is a method of evaluating a security by attempting to measure its intrinsic value. The analysis includes, but is not limited to, examining

related economic, financial and other qualitative and quantitative factors. Fundamental analysts attempt to study everything that can affect the security's value, including industry conditions and individual company factors. The end goal of performing fundamental analysis is to produce a value which we can compare against the security's current price to determine what position to take with that security (underpriced = buy, overpriced = sell or short).

*Ongoing monitoring/attribution analysis* – Our investment portfolios are monitored on an ongoing basis. This monitoring includes comprehensive attribution analysis to help understand the origins of return and the effectiveness of the strategies. This information is used to help recalibrate our strategies as needed.

### **Investment strategies**

The results of the PILR and World View analysis serve as the driving force behind our diverse strategies.

Within our Asset Management Services we offer multiple asset allocation strategies based on a spectrum of portfolio objectives, risk tolerances, and complexity of client circumstances. These asset allocation strategies use dynamic allocation targets and can invest in a variety of instruments; i.e. mutual funds, ETFs, domestic or foreign equities, REITS, individual bonds, preferred stocks, etc. All strategies offered under our Asset Management Services may be customized to meet specific client goals and objectives, and therefore deviate from the target portfolios.

### **Risk of Loss**

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities involves risk of loss. Further, depending on the different types of investments there may be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, our Firm is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines. Investors should be aware that accounts are subject to the following risks:

\*Market Risk — Even a long-term investment approach cannot guarantee a profit. Economic, political and issuer-specific events will cause the value of securities to rise or fall. Because the value of investment portfolios will fluctuate, there is the risk that you will lose money and your investment may be worth more or less upon liquidation.

\*Foreign Securities and Currency Risk — Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.

\*Capitalization Risk — Small-cap and mid-cap companies may be hindered as a result of limited resources or less diverse products or services, and their stocks have historically been more volatile than the stocks of larger, more established companies.

\*Interest Rate Risk — In a rising rate environment, the value of fixed-income securities generally declines and the value of equity securities may be adversely affected.

\*Credit Risk — Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and, thus, impact the fund's performance.

\*Securities Lending Risk — Securities lending involves the risk that the fund loses money because the borrower fails to return the securities in a timely manner or at all. The fund could also lose money if the value of the collateral provided for loaned securities, or the value of the investments made with the cash collateral, falls. These events could also trigger adverse tax consequences for the fund.

\*Short term trading - There are additional trading costs and tax consequences associated with short term trading.

\*Exchange-Traded Funds — ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in the secondary markets and disruption in the creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."

\*Performance of Underlying Managers — We select the mutual funds and ETFs in the asset allocation models. However, we depend on the manager of such funds to select individual investments in accordance with their stated investment strategy.

\*Leveraged Closed End Fund - Leveraged closed end funds offer investors the opportunity to purchase shares of a fund whose dividend yields generally are designed to be higher than those of similar, unleveraged investments. At the same time, leverage introduces or heightens certain investment risks. As a result, understanding leverage, its benefits and risks, plays an important role in determining whether a leveraged Fund is the right investment. Leverage creates risks that may adversely affect the return for the holders of common shares, including: the likelihood of greater volatility of NAV and market price of the Fund's common shares, fluctuations in the dividend rates, and possible increased operating costs, which may reduce the Fund's total return.

\*Margin transactions: investor pays for part of the purchase and borrows the rest from a brokerage firm; for example, an investor buys \$5,000 worth of stock in a margin account by paying for \$2,500 and borrowing \$2,500 from a brokerage firm. Clients cannot borrow stock from their advisor.

\*Option writing: includes covered options, uncovered options to spreading strategies. Note: options are contracts giving the purchaser the right to buy or sell a security, such as stocks, at a fixed price within a specific period of time

## **Item 9 – Disciplinary Information**

This item is not applicable to this brochure as there are no legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

## **Item 10 – Other Financial Industry Activities and Affiliations**

Athlete Society, LLC:

Athlete Society, LLC is a separate yet affiliated company of Vigilare Wealth Management, LLC. Athlete Society, LLC is a professional services company focusing on the financial needs of professional athletes. Services include financial coaching, budgeting, housing, cash management, income and expense forecasting, guidance on credit creation and management, charitable giving, and financial risk analysis. Services will include referral to additional professional service companies as needed. Athlete Society, LLC does not provide advice or guidance on investments or securities. Investment and security recommendations will be referred to Vigilare Wealth Management, LLC. Athlete Society, LLC is owned by the managing members of Vigilare Wealth Management, LLC; Zeljko Jag Zdrle and Jason Scott Polit.

Clients of Athlete Society, LLC may, at their own choosing, also be clients of Vigilare Wealth Management, LLC. Clients and/or prospects of Athlete Society, LLC will be referred to Vigilare Wealth Management, LLC for investment advisory services but acceptance into Athlete Society is not conditional upon on a past, present, or future affiliation with Vigilare Wealth Management, LLC. A client who is engaged with the services of both entities could be viewed as being more valuable to the managing members than a client who is solely engaged with Vigilare Wealth Management, LLC. This creates a potential conflict of interest. Vigilare's policy is for investment advisory services to be provided to clients on an equal basis; indifferent to the source of the referral or the relationship with an affiliated business.

#### Insurance Agents:

IARs of Vigilare Wealth Management, LLC may act as agents appointed with various life, disability or other insurance companies and may receive commissions, trails, or other compensation from the respective product sponsors and/or as a result of effecting insurance transactions for clients. However, clients should note that they are under no obligation to purchase any insurance products through Vigilare Wealth Management, LLC or its IAR(s).

### **Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading**

We have adopted a Code of Ethics, the full text of which is available upon request.

We have multiple goals in adopting our Code of Ethics. First, we desire to comply with all applicable laws and regulations governing its practice. We believe that compliance with such regulations is a signal to our clients that we exist to serve them, not us, and that we support the efforts of those organizations dedicated to upholding the law.

Second, our management has determined to set forth guidelines for professional standards, under which all associated persons are to conduct themselves. We have set high standards, the intention of which is to protect client interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with clients. All associated persons are expected to strictly adhere to the guidelines established in the Code of Ethics. Violations of the Code are cause for Disciplinary action.

Finally, we have adopted specific policies and procedures designed to assist in the implementation of the guidelines. Such policies and procedures will serve to assist in reviewing the effectiveness of the implementation of the Code on an ongoing basis.

#### **Employee Personal Securities Transactions Disclosure**

Vigilare Wealth Management, LLC and/or its Investment Advisor Representatives may buy or sell securities or have an interest or position in their personal account(s) in a security that they also recommend to clients. We are and shall continue to be in compliance with *The Insider Trading and Securities Fraud Enforcement*

*Act of 1988*. As these situations may represent a potential conflict of interest, it is our policy that no IARs shall prefer his or her own interest to that of an advisory client. No person employed by us may purchase or sell any security prior to a transaction or transactions being implemented for an Advisory client account. Officers, IARs, and employees shall not buy or sell securities for their personal account(s) where their decision is derived, in whole or in part, from information obtained as a result of his/her employment unless the information is also available to the investing public upon reasonable inquiry. We maintain a list of all securities holdings for ourselves and all IARs and employees. These lists, along with the individual personal securities transaction of our associated persons, are reviewed by our Chief Compliance Officer on a regular and ongoing basis.

## **Item 12 – Brokerage Practices**

Vigilare Wealth Management, LLC participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. (“TD Ameritrade”) member FINRA/SIPC. TD Ameritrade is independent and unaffiliated with the Firm. . TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Vigilare Wealth Management, LLC does receive some benefits from TD Ameritrade through its participation in the program, as outlined below in Item 14 below.

The primary factor in suggesting a broker/dealer or custodian is that the services of the recommended firm are provided in a cost effective manner. While quality of execution at the best price is an important determinant, best execution does not necessarily mean lowest price and it is not the sole consideration.

At least annually, we will review alternative custodians in the marketplace for comparison to the currently used custodian, evaluating criteria such as overall expertise, cost competitiveness, quality of execution, trade correction services, statement preparation and financial condition. Quality of execution for custodians will be reviewed through trade journal evaluations.

### **Trade Errors**

We have implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors in a manner that is in the best interest of the client. In all situations where the client does not cause the trade error, the client will be made whole and we, or the broker-dealer, will absorb any resulting losses. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. We will never benefit or profit from trade errors.

### **Aggregation of Client Orders-Block Trading Policy**

Transactions implemented by us for client accounts are generally effected independently, unless the firm decides to purchase or sell the same securities for several clients at approximately the same time. This process is referred to as aggregating orders, batch trading or block trading and is used by the firm when we believe such action may prove advantageous to clients. Typically, the process of aggregating client orders is done in order to achieve better execution, to negotiate more favorable commission rates or to allocate orders among clients on a more equitable basis. When Vigilare Wealth Management, LLC aggregates client orders, the allocation of securities among client accounts will be done on a fair and equitable basis. Transactions will be averaged as to price and will be allocated among the firm’s clients in proportion to the purchase and sale orders placed for each client account on any given day. When aggregating client orders Vigilare Wealth Management, LLC will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* It should be noted, Vigilare Wealth Management,

LLC does not receive any additional compensation or remuneration as a result of aggregation.

### **Item 13 – Review of Accounts**

#### **Account Reviews and Reviewers**

Client accounts will be reviewed on a recurring basis to ensure consistency with the respective investment strategy and the client's stated goals, objectives, and constraints. The Investment Advisor Representative assigned to the account will review client account(s) activity at least semi-annually. Updates to any previously created written financial plans may be provided in conjunction with the review.

#### **Statements and Reports**

The custodian for the individual client accounts will provide clients with an account statement at least quarterly. Advent Software Inc., a third party reconciliation agent, provides enhanced customizable performance and statement reporting at no extra charge to clients. Vigilare Wealth Management, LLC will provide clients with Performance/Position summary reports quarterly and upon request. Reports may also be provided at scheduled client meetings. Clients are urged to compare the reports provided by Vigilare Wealth Management, LLC against the account statements received directly from their account custodian.

### **Item 14 – Client Referrals and Other Compensation**

#### **Client Referrals**

We may, from time to time, make cash payments to introducing broker-dealers, investment advisory firms or qualified solicitors for client referrals, provided that each solicitor will provide all prospective clients a copy of our Brochure and a separate written disclosure document which fully discloses the nature of the relationship between the solicitor and our firm. In exchange for each referral, we pass through to the solicitor a percentage of the management fee received by us from you, payable for time periods negotiated by and between Vigilare Wealth Management, LLC and the solicitor or until the account is closed by written authorization from you, whichever first occurs. Such fees are paid on a quarterly basis after collection from you to us.

Vigilare Wealth Management, LLC is affiliated by common ownership with Athlete Society LLC. Athlete Society LLC is a qualified solicitor for Vigilare Wealth Management, LLC. Please see Item 10 – Other Financial Industry Activities and Affiliations for further details.

#### **Additional Compensation**

As disclosed under Item 12 above, Vigilare Wealth Management, LLC participates in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our Clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the program may benefit our firm but may not benefit our Client

accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by our firm or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm or our related persons in and of itself creates a potential conflict of interest and may indirectly influence the choice of TD Ameritrade for custody and brokerage services.

#### **Additional Services from TD Ameritrade**

Our firm also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Bloomberg, Advent/BlackDiamond, Morningstar, Advicent, RedTail Technology, NYSE Market, Broadridge, Logmein, Inc, Riskalyze and Salentica. TD Ameritrade provides the Additional Services to our firm in its sole discretion and at its own expense, and we do not pay any fees to TD Ameritrade for the Additional Services. Our Firm and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Our receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to our firm, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, our Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with our firm, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, we may have an incentive to recommend to our Clients that the assets under management by our Firm be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Our receipt of Additional Services does not diminish our duty to act in the best interests of our Clients, including to seek best execution of trades for Client accounts.

#### **AdvisorDirect**

We may receive client referrals from TD Ameritrade through our participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, our firm may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with our Firm and there is no employee or agency relationship between them. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise our Firm and has no responsibility for our Firm's management of client portfolios or our other advice or services. We pay TD Ameritrade an on-going fee for each successful client referral. For referrals that occurred through AdvisorDirect before April 10, 2017, this fee is a percentage (not to exceed 25%) of our Firm's advisory fee that the client pays to our Firm ("Solicitation Fee"). For referrals that occurred through AdvisorDirect on or after June 9, 2017 the Solicitation Fee is an annualized fee based on the amount of referred client assets that does not exceed 25% of 1%, unless such client assets are subject to a Special Services Addendum. In the case of a Special Services Addendum, the Solicitation Fee is an annualized fee based on the amount of referred client assets that does not exceed 10% of 1%. Our Firm will also pay TD Ameritrade the Solicitation Fee on any assets received by us from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired us on the recommendation of such referred client. Our Firm will not charge clients referred through AdvisorDirect any fees or costs higher than its standard fee schedule offered to our clients

or otherwise pass Solicitation Fees paid to TDAmeritrade to its clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

Our participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, our Firm may have an incentive to recommend to clients that the assets under management by our Firm be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, our Firm has agreed not to solicit clients referred to it through AdvisorDirect to transfer their accounts from TDAmeritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Our participation in AdvisorDirect does not diminish its duty to seek best execution of trades for client accounts.

### **Item 15 – Custody**

Custody, as it applies to investment advisors, has been defined by regulators as having access or control over client funds and/or securities. In other words, custody is not limited to physically holding client funds and securities. If an investment advisor has the ability to access or control client funds or securities, the investment advisor is deemed to have custody and must ensure proper procedures are implemented.

Vigilare Wealth Management, LLC is deemed to have custody of client funds and securities whenever Vigilare Wealth Management, LLC is given the authority to have fees deducted directly from client accounts. However, this is the only form of custody Vigilare Wealth Management, LLC will ever maintain. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

For accounts in which Vigilare Wealth Management, LLC is deemed to have custody, the firm has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. Clients should carefully review those statements and are urged to compare the statements against reports received from Vigilare Wealth Management, LLC. When clients have questions about their account statements, they should contact Vigilare Wealth Management, LLC or the qualified custodian preparing the statement.

### **Item 16 – Investment Discretion**

#### **Discretionary Trading Authorization**

We provide our Asset Management Services on a discretionary basis. Our discretionary authority will be granted by the client in the Advisory Services Agreement. When discretionary authority is granted, it is limited in that client will only be granting Vigilare Wealth Management, LLC discretionary trading authority. This authority will allow us to determine the type and amount of securities to be bought or sold for the client portfolio without obtaining the client's consent for each transaction. It is the policy of Vigilare Wealth Management, LLC to consult with clients prior to making significant changes within the portfolio even when discretionary trading authority has been granted.

All clients have the ability to place reasonable restrictions on the types of investments that may be



purchased in an account. Clients may also place reasonable limitations on the discretionary power granted to our firm so long as the limitations are specifically set forth within or included as an attachment to the client agreement. All restrictions and limitations are subject to review and approval by Vigilare Wealth Management, LLC.

#### **Item 17 – Voting Client Securities**

Vigilare Wealth Management, LLC does not vote proxies on behalf of clients. Clients will receive proxies directly from their custodian or transfer agent. Proxy related materials/ documents will not be delivered to Vigilare Wealth Management, LLC. Although we do not vote client proxies, if you have a question about a particular proxy please contact us.

#### **Item 18 – Financial Information**

We are not subject to a financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients and we do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. We have not been the subject of a bankruptcy petition at any time.

***Information Required by Part 2B of Form ADV: Brochure Supplement – Jason Scott Polit***

The following are responses to each item found in the Form ADV Part 2B instructions.

**Item 1 – Cover Page**

Vigilare Wealth Management, LLC  
8585 East Hartford Drive Suite 113  
Scottsdale, AZ 85255

Phone Number: (480) 330-0623

Date of Brochure: March 2020

This brochure supplement provides information about Jason Scott Polit that supplements the information previously provided in this brochure. Please contact Jason Polit at (480) 636-8292 if you have any questions about the contents of this supplement.

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

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

**Jason Scott Polit, Born 1973**

**Educational Background:**

University of Arizona, Bachelor's Degree – Finance, 1997  
Chartered Financial Analyst (CFA)\* designation obtained 2004

**Business Experience:**

- Vigilare Wealth Management, LLC, Managing Member June 2011 – Present
- Athlete Society, LLC, Managing Member, March 2015 - Present
- Charles Schwab and Company, Portfolio Consultant, January 1999 to June 2011

**Item 3 – Disciplinary Information**

As previously stated in Item 9 of this Disclosure Brochure, Mr. Polit has never been subject to a legal or disciplinary event.

**Item 4 – Other Business Activities**

Please see Item 10 of this Disclosure Brochure for details regarding other business activities.

**Item 5 – Additional Compensation**

Please see Item 10 and Item 14 of this Disclosure Brochure for the explanation of insurance commissions received.

**Item 6 – Supervision**

Jason Polit is the Chief Compliance Officer of Vigilare Wealth Management, LLC and ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons. Jason Polit's phone number is (480) 636-8292.

Jason Polit reviews all trade recommendations, financial plans and proposals, reviews all plan implantation and does follow up on an ongoing basis.

**Item 7 – Legal and Financial Disclosure**

Mr. Polit has not been the subject of any client arbitrations, similar legal disputes or have been the subject of any bankruptcy petitions.

*\* The Chartered Financial Analyst (CFA) designation is issued by the CFA Institute. A candidate for designation must have either: (1) an undergraduate degree and four years of professional experience involving investment decision-making or (2) four years of qualified work experience (full time but not necessarily investment related). There are 3 course exams that must be passed and each course level is a self-study program involving 250 hours of study time. There are no continuing education requirements.*

## ***Information Required by Part 2B of Form ADV: Brochure Supplement – Zeljko Jag Zdrle***

The following are responses to each item found in the Form ADV Part 2B instructions.

### **Item 1 – Cover Page**

Vigilare Wealth Management, LLC  
8585 East Hartford Drive Suite 113  
Scottsdale, AZ 85255

Phone Number: (480) 370-6162

Date of Brochure: March 2020

This brochure supplement provides information about Zeljko Jag Zdrle that supplements the information previously provided in this brochure. Please contact Jason Polit at (480) 636-8292 if you have any questions about the contents of this supplement.

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

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

**Zeljko Jag Zdrle, Born 1978**

#### **Educational Background:**

Arizona State University, Bachelor's Degree – Finance, 2003

#### **Business Experience:**

- Vigilare Wealth Management, LLC, Managing Member June 2011 – Present
- Athlete Society, LLC, Managing Member, March 2015 - Present
- Charles Schwab and Company, Portfolio Consultant June 2006 to June 2011
- American Express Financial Advisors, Financial Consultant, February 2006 – June 2006
- John Hall and Associates, Realtor, October 1999 – June 2006

### **Item 3 – Disciplinary Information**

As previously stated in Item 9 of this Disclosure Brochure, Mr. Zdrle has never been subject to a legal or disciplinary event.

### **Item 4 – Other Business Activities**

Mr. Zdrle holds an insurance license to sell limited insurance products. It is anticipated that a small portion, less than (10%) of his time, will be spent providing these insurance products. He may receive compensation from selling insurance products and therefore receive economic benefit for this activity. This activity may create a conflict of interest with clients. However, since this activity represents less than 10% of his time and income, it is presumed not to be substantial. Please see Item 10 of this Disclosure Brochure for details regarding my other business activities.

### **Item 5 – Additional Compensation**

The above business associations do not provide any additional compensation other than as described in our Firm's Disclosure.

**Item 6 – Supervision**

Jason Polit is the Chief Compliance Officer of Vigilare Wealth Management, LLC and ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons. Jason Polit's phone number is (480) 636-8292.

Jason Polit reviews all trade recommendations, financial plans and proposals, reviews all plan implantation and does follow up on an ongoing basis.

**Item 7 – Legal and Financial Disclosure**

Mr. Zdrle has not been the subject of any client arbitrations, similar legal disputes or been the subject of any bankruptcy petitions.

***Information Required by Part 2B of Form ADV: Brochure Supplement – Racquel Leigh Kolsrud***

The following are responses to each item found in the Form ADV Part 2B instructions.

**Item 1 – Cover Page**

Vigilare Wealth Management, LLC  
12707 High Bluff Drive #200  
San Diego, CA 92130

Phone Number: (858) 367-9946

Date of Brochure: March 2020

This brochure supplement provides information about Racquel Leigh Kolsrud that supplements the information previously provided in this brochure. Please contact Jason Polit at (480) 636-8292 if you have any questions about the contents of this supplement.

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

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

**Racquel Leigh Kolsrud, Born 1975**

**Educational Background:**

San Diego State University, CFP Program 2006-2007  
University of Phoenix, Bachelor's Degree Business Administration, 1999  
Arizona State University, 1994-1996  
Mesa Community College, 1993-1994

Certified Financial Planner\* (CFP™) Designation, 2008

**Business Experience:**

- Vigilare Wealth Management, LLC, Investment Advisor Representative July 2014 - Present
- Vigilare Wealth Management, LLC, Managing Member June 2011 to June 2014
- Dowling and Yahnke, LLC, Portfolio Manager, July 2009 to June 2011
- Charles Schwab and Company, Financial Consultant, January 2000 to June 2009

**Item 3 – Disciplinary Information**

As previously stated in Item 9 of this Disclosure Brochure, Ms. Kolsrud has never been subject to a legal or disciplinary event.

**Item 4 – Other Business Activities**

Please see Item 10 of this Disclosure Brochure for details regarding other business activities.

**Item 5 – Additional Compensation**

Please see Item 10 and Item 14 of this Disclosure Brochure for the explanation of insurance commissions received.

**Item 6 – Supervision**

Jason Polit is the Chief Compliance Officer of Vigilare Wealth Management, LLC and ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the

activities and services provided by the firm and its supervised persons. Jason Polit's phone number is (480) 636-8292.

**Item 7 – Legal and Financial Disclosure**

Ms. Kolsrud has not been the subject of any client arbitrations, similar legal disputes or been the subject of any bankruptcy petitions.

*\* The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is issued by the CERTIFIED FINANCIAL PLANNER Board of Standards, Inc. It is a voluntary certification recognized by the United States and other countries for its (1) high standard of professional education, (2) stringent code of conduct and standards of practice and (3) ethical requirements governing professional engagements with clients. A candidate for designation must first obtain a Bachelor's Degree from an accredited college or university with courses that included financial planning subject areas (e.g. insurance planning, risk management, employee benefits planning, investment planning, income tax planning, retirement planning and estate planning). Candidates must also have at least 3 years of full-time personal financial planning experience, measured as 2,000 hours per year. CFP® candidates must pass a 2-day comprehensive examination designed to test their ability to correctly diagnose financial planning issues and apply their knowledge to real world circumstances. Candidates must also agree to be bound by the CERTIFIED FINANCIAL PLANNER Board's Standards of Professional Conduct. Anyone earning designation as a CFP® must complete 30 hours of continuing education every two years and renew the agreement to be bound by the Standards of Professional Conduct.*

***Information Required by Part 2B of Form ADV: Brochure Supplement – Michael Lloyd Delcarlo***

The following are responses to each item found in the Form ADV Part 2B instructions.

**Item 1 – Cover Page**

Vigilare Wealth Management, LLC  
12707 High Bluff Drive #200  
San Diego, CA 92130

Phone Number: (858) 367-9946

Date of Brochure: March 2020

This brochure supplement provides information about Michael Lloyd Delcarlo that supplements the information previously provided in this brochure. Please contact Jason Polit at (480) 636-8292 if you have any questions about the contents of this supplement.

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

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

**Michael Lloyd Delcarlo, Born 1981**

**Educational Background:**

Northern Arizona University, Business Management, 2004

Certified Financial Planner\* (CFP™) Designation, 2008

**Business Experience:**

- Vigilare Wealth Management, LLC, Investment Advisor Representative, July 2019 - Present
- Schwab Private Client Investment Advisory, Inc., Manager Portfolio Consultant, January 2012 to June 2019
- Charles Schwab & Co., Inc., Manager Portfolio Consultant, April 2008 to June 2019
- Charles Schwab Bank, Dual Bank Employee, February 2011 to December 2011

**Item 3 – Disciplinary Information**

Michael Delcarlo does not have any disciplinary history that is deemed to be material to a client's consideration of Mr. Delcarlo to act as their investment adviser representative. FINRA's BrokerCheck® <https://brokercheck.finra.org/> has additional information regarding the disciplinary history of Michael Delcarlo that is not included in this brochure supplement.

**Item 4 – Other Business Activities**

Please see Item 10 of this Disclosure Brochure for details regarding other business activities.

**Item 5 – Additional Compensation**

Please see Item 10 and Item 14 of this Disclosure Brochure for the explanation of insurance commissions received.

**Item 6 – Supervision**



Jason Polit is the Chief Compliance Officer of Vigilare Wealth Management, LLC and ultimately responsible for the firm's compliance program including establishing procedures designed to monitor and supervise the activities and services provided by the firm and its supervised persons. Jason Polit's phone number is (480) 636-8292.

**Item 7 – Legal and Financial Disclosure**

Mr. Delcarlo has not been the subject of any client arbitrations, similar legal disputes or the subject of any bankruptcy petitions.

*\* The CERTIFIED FINANCIAL PLANNER™ (CFP®) designation is issued by the CERTIFIED FINANCIAL PLANNER Board of Standards, Inc. It is a voluntary certification recognized by the United States and other countries for its (1) high standard of professional education, (2) stringent code of conduct and standards of practice and (3) ethical requirements governing professional engagements with clients. A candidate for designation must first obtain a Bachelor's Degree from an accredited college or university with courses that included financial planning subject areas (e.g. insurance planning, risk management, employee benefits planning, investment planning, income tax planning, retirement planning and estate planning). Candidates must also have at least 3 years of full-time personal financial planning experience, measured as 2,000 hours per year. CFP® candidates must pass a 2-day comprehensive examination designed to test their ability to correctly diagnose financial planning issues and apply their knowledge to real world circumstances. Candidates must also agree to be bound by the CERTIFIED FINANCIAL PLANNER Board's Standards of Professional Conduct. Anyone earning designation as a CFP® must complete 30 hours of continuing education every two years and renew the agreement to be bound by the Standards of Professional Conduct.*