

March 2020

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Vauban Wealth Management, Corporation. If you have any questions about the contents of this brochure, please contact us at 939-940-8529 and/or [admin@vaubanwealth.online](mailto:admin@vaubanwealth.online). The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission (“SEC”) or by any state securities authority. The term “Registered Investment Adviser” does not imply a certain level of skill or training. Additional information about Vauban Wealth Management, Corporation and its advisory persons are available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD #305222.

**Vauban Wealth Management, Corporation**  
**Lot K-2 Marginal Street Suite 201**  
**Oasis Gardens Development**  
**Guaynabo, P.R. 0969**  
**Tel. 939-940-8529**  
**[admin@vaubanwealth.online.com](mailto:admin@vaubanwealth.online.com)**

## **Item 2: Material Changes**

From time to time, this Disclosure Brochure may be amended to reflect changes in our business practices, changes in regulations and routine annual or other than annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes will be provided to you annually and if any information provided herein becomes materially inaccurate. If an amended Disclosure Brochure is provided to you, this Item 2 will be utilized to provide you with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for our firm name or by our CRD #305222. You may also request a copy of this Disclosure Brochure at any time, by contacting us at 939-940-8529 and/or [admin@vaubanwealth.online](mailto:admin@vaubanwealth.online).

**Since VWM original brochure of September 2019, the following material changes have occurred:**

Item 1. Was updated to reflect the new address of Vauban Wealth Management

Item 5. Includes current Assets under Management and type of clients as of January 31, 2020

Item 7. Discloses a related person (VIB) acting as qualified custodian in connection to advisory services provided by Vauban Wealth Management.

Item 8. Was updated to disclose that now employees may receive compensation related to obtaining clients for the firm.

Item 9. Was updated to disclose custody of assets by a related person.

### **Material Changes for Form ADV Part 2B Disclosure Brochure**

Goel Velazquez Rosa joined VWM on January 2020 as Investment Advisor

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## Item 4: Advisory Services

### A. Firm Information

Vauban Wealth Management, Corporation (“VWM”, “Vauban Wealth Management” or the “Advisor”) is a registered investment advisor with the SEC organized as a corporation under the laws of the Commonwealth of Puerto Rico. Founded in July 2019, VWM is owned by Laperouse LTD, a company registered in the Bahamas. Mr. Hubert Francois-Poncet owns 100% of Laperouse LTD. This Disclosure Brochure provides information regarding the qualifications, business practices and advisory services provided by Vauban Wealth Management.

### B. Advisory Services Offered

VWM offers account management services to clients (“Clients”) on either a discretionary basis, where the Client authorizes VWM to make all investment decisions for the account, or on a non-discretionary basis, where VWM makes recommendations to the Client but all investment decisions are made by the Client and may or may not be implemented by the Client. All Client assets will be managed pursuant to the Client’s selected investment strategy.

The investment strategies offered by VWM are as follows:

- |                       |   |
|-----------------------|---|
| a) Income:            | exclusively invested in fixed income securities                           |
| b) Conservative:      | predominantly invested in fixed income securities                         |
| c) Balanced:          | balanced allocation of fixed income securities and equities               |
| d) Dynamic Growth:    | predominantly invested in equities  |
| e) Aggressive Equity: | quasi exclusively invested in equities                                    |
| f) Alternative:       | A large part of the portfolio may be invested in alternative investments. |

A Client may impose reasonable restrictions on the investments to be made by VWM. Clients should be aware that their restrictions can limit VWM’s ability to act and as a result, their performance may differ from other accounts that are not subject to similar restrictions. VWM shall not be bound by any amendment to a Client’s investment restrictions unless and until the Client and VWM have agreed in writing to such amendment.

### C. Client Account Management

Prior to engaging VWM to provide investment advisory services, each Client is required to enter into one or more investment advisory agreements with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. The services provided by VWM may include:

- Establishing an Investment Strategy
- Asset Allocation
- Portfolio construction and implementation
- Investment Management and Supervision

VWM is committed to treat Clients in a fair and equitable manner and render impartial advice making recommendations based on the Client’s needs, financial circumstances and investment objectives. Also, VWM will manage and disclose any material conflict of interest in writing.

#### D. Wrap Fee Program

Vauban Wealth Management does not participate in a wrap fee program.

#### E. Assets Under Management

As of January 31, 2020, VWM manages approximately \$146,325,963. When \$24,552,447 of that total is on a Discretionary basis and \$121,773,516 is on a Non-Discretionary basis.

### **Item 5: Fees and Compensation**

#### A. Fees for Advisory Service

VWM currently charges an annual advisory fee of 1.0% of assets under management ("Investment Advisory Fee"). This fee is calculated and charged quarterly on the first days of the following month based on the value of the assets as of the last day of the quarter as calculated by the Client's custodian. VWM will pro rate fees for accounts where the investment advisory management agreement is initiated or terminated on a date creating less than a full quarter of investment management for either the initial or final month of the Agreement.

The Advisor reserves the right, in its sole discretion, to negotiate, reduce or waive the Investment Advisory Fee for certain Client accounts for any period of time determined solely by VWM. In addition, the Adviser may reduce or waive its Investment Advisory Fees for the accounts of some Clients without notice to, or fee adjustment for, other Clients.

VWM's Investment Advisory Fee is exclusive of and in addition to, other fees and expenses which Client may incur in connection with VWM's advisory services. Please see Item 5(C) below. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

All securities managed by VWM will be independently valued by the custodian. VWM will not have the authority or responsibility to value portfolio securities.

Apart from the personal Client service provided directly by VWM, services identical to VWM may be provided by other investment advisors for advisory fees that may be greater than or less than the advisory fees charged by VWM. Additionally, Clients could invest in the same or similar products directly, without the services of VWM.

#### B. Fee Billing

Investment Advisory Fees are calculated by the Advisor and deducted from the Client's account[s] by the custodian. The Advisor shall send an invoice to the custodian indicating the amount of the fees to be deducted from the Client's account[s] a few days after the end of the quarter for which the fee is charged. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with VWM at the end of such quarter as described in Item 5(A) above. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's portfolio valuation statement. Clients provide written authorization permitting

VWM to be paid from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

**C. Other fees and expenses**

Clients will incur certain fees or charges imposed by third-parties, other than VWM, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealers. Mutual funds and variable annuity sub-account fees and expenses are described in each fund's or sub account's prospectus. These fees will generally include a management fee, other expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge.

The Investment Advisory Fee charged by VWM is separate and distinct from these custodian and execution fees.

Apart from the personal client service provided directly by VWM, services identical to VWM may be provided by other investment advisers for advisory fees that may be greater than or less than the advisory fees charged by VWM. Additionally, clients could invest in the same or similar products directly, without the services of VWM.

**D. Advance Payment of Fees and Termination**

VWM does not charge fees in advance. Clients may request to terminate their investment advisory agreement with VWM, in whole or in part, by providing thirty (30) days advance written notice. The Client shall be responsible for Investment Advisory Fees up to and including the effective date of termination. VWM will pro rate fees for accounts where the investment advisory agreement is terminated on a date creating less than a full quarter of investment management for either the initial or final month of the agreement. The Client's investment advisory agreement with the Advisor is non-transferable without Client's prior written approval.

**E. Compensation for Sales of Securities**

Neither VWM nor any of its supervised persons receive any compensation for securities transactions, other than the Investment Advisory Fees noted above.

**Item 6: Performance-Based Fees & Side by Side Management**

Vauban Wealth Management does not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client). All fees are calculated as disclosed in Item 5 above and are not charged on the basis of income or capital appreciation of the assets of a Client. VWM has no financial incentive to recommend any particular investment options to its Clients.

## **Item 7: Types of Clients**

Vauban Wealth Management offers investment advisory services to individuals, high net worth individuals, trusts, estates, corporations and businesses. VWM generally does not impose a minimum account size for establishing a relationship. Nevertheless, VWM reserves the right to reject a relationship for any reason.

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

### **A. Methods of Analysis**

Vauban Wealth Management employs both fundamental and technical analysis methods in developing investment strategies for its Clients. Research and analysis are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

### **B. Risk of Loss**

All securities investments involve risk. Investing in securities involves risk of loss that Clients must understand and be prepared to bear. VWM assists Clients in determining an appropriate strategy based on their tolerance for risk and other factors. However, there is no guarantee that a Client will meet their investment goals. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor will monitor the investments to determine the need to reallocate portfolios as necessary.

The Client must understand and participate in the process and provide accurate information to the Advisor for the analysis to be efficient. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis. The risks associated with a particular strategy are provided to each Client. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio selection process.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Adviser.

Some of the risks may include:

- a. **Credit Risk:** If debt obligations held by an account are downgraded by ratings agencies or go into default, or if management action, legislation or other government action reduces the ability of issuers to pay principal and interest when due, the value of those obligations may decline, and an account's value may be reduced.

- b. **Developing Country Risk:** At times the prices of equity securities or debt obligations of a developing country issuer may be extremely volatile. An issuer domiciled in a developed country may be similarly affected by these developing country risks to the extent that the issuer conducts a significant percentage of its business in developing countries.
- c. **Focused Investment Risk:** An investment strategy that invests in a focused portfolio of issuers may be subject to increased risk because changes in the value of one of the issuers may have a greater impact on the total value of the portfolio than if the portfolio is invested in a larger number of issuers. Further, to the extent that some of the issuers in the portfolio are in the same or related industries or sectors, any economic, political, regulatory or other event affecting one of those industries or sectors may have a greater impact on the total value of the portfolio.
- d. **Foreign Investment Risk:** Investments in securities of foreign issuers may involve risks including adverse fluctuations in currency exchange rates, political instability, confiscations, taxes or restrictions on currency exchange, difficulty in selling foreign investments, and reduced legal protection. These risks may be more pronounced for investments in developing countries.
- e. **High Yield Risk:** Debt obligations that are rated below investment grade and unrated obligations of similar credit quality (commonly referred to as “junk” or “high yield” bonds) may have a substantial risk of loss. These obligations are generally considered to be speculative with respect to the issuer’s ability to pay interest and principal when due. These obligations may be subject to greater price volatility than investment grade obligations, and their prices may decline significantly in periods of general economic difficulty or in response to adverse publicity, changes in investor perceptions or other factors. These obligations may also be subject to greater liquidity risk.
- f. **Political Risks:** Political events anywhere in the world may have unforeseen consequences to markets around the world.
- g. **General Market Risks:** The value of an account’s investments may decline due to changes in general economic and market conditions. The value of a security held in an account may change in response to developments affecting entire economies, markets or industries, including changes in interest rates, political and legal developments, changes in U.S. Federal Reserve Board (or other central bank) policy, and general market volatility.
- h. **Currency Risk:** When investing in another country using another currency, the changes in the value of the currency can change the value of your security value in your portfolio.
- i. **Regulatory Risk:** Changes in laws and regulations from any government can change the value of a given company and its accompanying securities. Certain industries are more susceptible to government regulation. Changes in zoning, tax structure or laws impact the return on these investments.
- j. **Risks Related to Investment Term:** Securities do not follow a straight line up in value. All securities will have periods of time when the current price of the security is not an accurate measure of its value. If you require us to liquidate your portfolio during one of these periods, you will not realize as much value as you would have had the investment had the opportunity to regain its value.



- k. **Purchasing Power Risk:** Purchasing power risk is the risk that your investment's value will decline as the price of goods rises (inflation). The investment's value itself does not decline, but its relative value does, which is the same thing. Inflation can happen for a variety of complex reasons, including a growing economy and a rising money supply.
- l. **Business Risk:** This can be thought of as certainty or uncertainty of income. Management comes under business risk. Cyclical companies (like automobile companies) have more business risk because of the less steady income stream.
- m. **Risks specific to sub-advisors and other managers:** If we invest some of your assets with another advisor, including a private placement, there are additional risks. These include risks that the other manager is not as qualified as we believe them to be, that the investments they use are not as liquid as we would normally use in your portfolio, or that their risk management guidelines are more liberal than we would normally employ.
- n. **Information Risk:** All investment professionals rely on research in order to make conclusions about investment options. This research is always a mix of both internal(proprietary) and external (provided by third parties) data and analyses. All data, or outside research is chosen for its perceived reliability, but there is no guarantee that the data or research will be completely accurate. Failure in data accuracy or research will translate to a compromised ability by the advisor to reach satisfactory investment conclusions.
- o. **Interest Rate Risk:** When interest rates increase, the value of the account's fixed income investments may decline, and the account's share value may be reduced. This effect is typically more pronounced for intermediate and longer-term obligations. When interest rates decrease, the account's current income may decline.
- p. **Liquidity Risk:** Due to a lack of demand in the marketplace or other factors, an account may not be able to sell some or all of the investments promptly or may only be able to sell investments at less than desired prices. The market for lower-rated and unrated debt obligations (including particularly "junk" or "high yield" bonds) and debt obligations backed by so-called "subprime" mortgages may be less liquid than the market for other obligations, making it difficult for an account to value its investment in a lower-rated or unrated obligation or to sell the investment in a timely manner or at an acceptable price.
- q. **Prepayment Risk:** When market interest rates decline, certain debt obligations held by an account may be repaid more quickly than anticipated, requiring the account to reinvest the proceeds of those repayments in obligations that bear a lower interest rate. Conversely, when market interest rates increase, certain debt obligations held by an account may be repaid more slowly than anticipated, causing assets of the account to remain invested in relatively lower yielding obligations. These risks may be more pronounced for investments in mortgage-backed and asset-backed securities.
- r. **Real Estate Risk:** Investments in real estate investment trusts ("REITs") are subject to risks affecting real estate investments generally (including market conditions, competition, property obsolescence, changes in interest rates and casualty to real

- estate), as well as risks specifically affecting REITs (the quality and skill of REIT management and the internal expenses of the REIT).
- s. **Risks Affecting Specific Issuers:** The value of an equity security or debt obligation may decline in response to developments affecting the specific issuer of the security or obligation, even if the overall industry or economy is unaffected. These developments may include a variety of factors, including but not limited to management issues or other corporate disruption, political factors adversely affecting governmental issuers, a decline in revenues or profitability, an increase in costs, or an adverse effect on the issuer's competitive position.
  - t. **Smaller Company Risk:** Investments in small-capitalization companies and mid-capitalization companies, including smaller, earlier stage companies, may involve additional risks. These risks may be relatively higher with smaller companies. These additional risks may result from limited product lines, more limited access to markets and financial resources, greater vulnerability to competition and changes in markets, lack of management depth, increased volatility in share price, and possible difficulties in valuing or selling these investments.
  - u. **Structured Products Risk:** Investments in structured finance arrangements, including collateralized mortgage obligations (CMOs), collateralized debt obligations (CDOs), collateralized bond obligations (CBOs) and collateralized loan obligations (CLOs), involve the risks associated with the underlying pool of securities or other assets, and also may involve risks different or greater than the risks affecting the underlying assets. In particular, these investments may be less liquid than other debt obligations, making it difficult for an account to value its investment or sell the investment in a timely manner or at an acceptable price.
  - v. **Investing in investment vehicles:** To the extent a Client account invests primarily in mutual funds or other investment vehicles, the risks associated with the account will be closely related to the risks associated with the securities and other investments held by the mutual fund or investment vehicle, which will be described in the fund's or vehicle's prospectus or offering document. The ability of a Client account to achieve its investment objective will depend upon the ability of the funds or other vehicles to achieve their investment objectives. The value of a Client's account, when investing in funds or vehicles, will fluctuate in response to changes in the net asset values of the funds or vehicles in which it invests. The extent to which the investment performance and risks associated with a Client account correlate to those of a particular fund or vehicle will depend upon the extent to which the account's assets are allocated from time to time for investment in a fund or vehicle, which will vary.

## **Item 9: Disciplinary Information**

Neither Vauban Wealth Management nor any of its management persons have been the subject of any material legal or disciplinary action. We encourage all of our Clients to perform the requisite due diligence on any advisor or service provider with whom you partner. You can find background information at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching by our firm CRD #305222.

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

### **A. Banking Institution Affiliation**

Vauban Wealth Management is a wholly owned subsidiary of Laperouse, LTD. Laperouse LTD is also the owner of Vauban International Bank (“VIB”), a corporation doing business as an international financial entity under the laws of the Commonwealth of Puerto Rico, authorized to engage in international banking transactions, fiduciary activities, and other activities of a financial nature outside of Puerto Rico, which would be allowed to be done by a bank holding company or by a foreign office or subsidiary of a United States bank under applicable United States law. Under Puerto Rico law, VIB may not engage any Puerto Rico residents as clients. VIB’s business focuses on custody services, and it has established sub-custodial arrangements with U.S. and non-U.S. banks. Vauban Wealth Management generally recommends its affiliate VIB as custodian for the assets of non-Puerto Rico Clients. This affiliation presents a conflict of interest; however, neither VWM, nor its advisors, will earn any additional compensation from VIB for this referral. In addition, Clients are not obligated to contract VIB as custodian to obtain VWM services. Although VWM recommend its non-Puerto Rico Clients to hold custody at VIB, Clients may choose to keep custody at another qualified financial institution.

### **B. Broker-Dealer Affiliation**

One of VWM’s management persons, the Chief Executive Officer and Chief Compliance Officer (“CEO/CCO”), Mrs. Mariela Torres, is also a registered representative of a non-affiliate broker-dealer, Portfolio Resources Group, Inc. (“PRG”), a member of the Financial Industry Regulatory Authority (“FINRA”) with strict administrative/compliance responsibilities not related to VWM’s business and not involving any of our Clients. In her separate capacity as a registered representative of PRG, Mrs. Torres does not implement securities transactions nor receives compensation in connection with the purchase and sale of securities in relation to VWM Clients.

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

### **A. Code of Ethics**

Vauban Wealth Management has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to our Clients. This Code applies to all persons associated with VWM as defined in the Code (collectively, our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. The Code covers a range of topics that address employee ethics and conflicts of interest including: general ethical principles, reporting personal securities trading, treatment of trading at the same time of Clients on the same security, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, and supervisory procedures. The Code also addresses insider trading (material non-public information controls) and personal securities reporting procedures. It is the obligation of VWM Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. Any individual not in compliance with the Code of Ethics may be subject to termination. A copy of the Code will be available to our Clients and prospects upon request.

#### B. Personal Trading and Conflicts of Interest

Vauban Wealth Management has included within its Code of Ethics a Personal Securities Transaction Policy to manage any potential conflicts that may arise from the personal investment activities of its “access persons” (i.e., Supervised Persons who may have access to client investment information or to securities recommendations that are nonpublic), which includes employees, officers, and members of its board of directors. The Personal Securities Transaction Policy has various features, including requirements that certain “access persons” disclose their investment accounts, solicit authorization prior to engaging in certain securities transactions, and disclose their trading activity regularly, as required by Rule 204A-1 of the U.S. Investment Advisers Act of 1940. Personal securities transactions by access persons are monitored for compliance with the Code and any person who violates the Code may be subject to remedial actions.

At no time, will VWM or any Supervised Person of VWM, transact in any security to the detriment of any Client.

### **Item 12: Brokerage Practices**

#### A. Recommendation of Custodians

Generally, as explained earlier, Vauban Wealth Management will recommend its non-Puerto Rico clients to use its affiliate VIB as Custodian. VWM will not receive any type of additional compensation if the Client decides to use VIB. For Puerto Rico clients, VWM may make a custodian recommendation at the Client’s request. Such recommendation will be based on commission rates, execution capability, responsiveness, creditworthiness and financial stability, clearance and settlement capability, among other considerations. In recommending the Custodian, VWM will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

Vauban Wealth Management does not participate in soft dollar programs sponsored or offered by any custodian or broker-dealer. Neither will VWM receive client referrals in exchange for directing transactions to a particular broker dealer.

#### B. Trade Aggregation

VWM will execute its transactions through the custodian as authorized by the Client. VWM will require from the custodian that if trades are aggregated by the Custodian, such aggregation is executed in good faith, proportionally to the original intended allocation (pro-rata) through an allocation procedure that is fair and equitable to all Clients with no particular group or Client(s) being favored or disfavored over any other Clients.

### **Item 13: Review of Accounts**

#### **A. Frequency of Reviews**

Securities in Client accounts are monitored on a regular and continuous basis by VWM's Compliance, in accordance with the duty owed to the Client as set forth in the Client's investment advisory agreement. Formal reviews are generally conducted at least annually or more frequently depending on the needs of the Client.

#### **B. Causes for Reviews**

Reviews may be conducted more frequently at the Client's request, as a result of major changes in economic conditions, due to known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client must notify VWM if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

#### **C. Review Reports**

The Client will receive statements no less than quarterly from the custodian. These portfolio valuation statements are sent directly from the custodian to the Client. The Client may also establish electronic access to the custodian's website so that the Client may view these reports and their account activity. Client portfolio valuation statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor will also provide Clients with periodic reports regarding their holdings, allocations, and performance.

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

#### **A. Other Compensation received by VWM**

VWM does not receive any additional compensation for client referrals to any other entity, including its affiliate VIB.

#### **B. Client Referrals from Solicitors**

Although no arrangement is currently in place, VWM may enter into written arrangements to pay cash referral fees to individuals or companies (Solicitors), who recommend prospective clients to VWM. In these cases, there will be a written agreement between VWM and the Solicitor, which clearly defines the duties and responsibilities of the solicitor under this arrangement. In addition, each Solicitor is required to provide a written disclosure document, which explains to the prospective client the terms under which the Solicitor is working with VWM and the fact that the Solicitor is being compensated for the referral activities.

### **Item 15: Custody**

Vauban Wealth Management does not accept or maintain custody of any Client accounts, except that it is deemed to have "custody" over Client accounts from which VWM is authorized to deduct Advisor's fees. For Clients who retain VWM's affiliate, VIB, to act as qualified custodian of their account(s) in connection with VWM services, VWM is deemed to have "custody" of those assets as well. All Clients must place their assets with a qualified custodian. Clients are required to engage the custodian to retain their funds and securities and direct VWM to utilize that custodian for the

Client's security transactions. Clients should review statements provided by the custodian and compare to any reports provided by VWM to ensure accuracy, as the custodian does not perform this review.

#### **Item 16: Investment Discretion**

Vauban Wealth Management may have discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, limitations, or restrictions previously set forth by the Client and agreed to by VWM. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority.

#### **Item 17: Voting Client Securities**

Vauban Wealth Management has a responsibility to vote proxies of Client securities under its management solely in the best interest of its clients if VWM has been delegated proxy voting responsibility by the Client. VWM will not vote the Client's proxies if the Client has retained that responsibility itself and has so notified VWM via the investment advisory agreement or in writing.

VWM has adopted written proxy policy guidelines ("Proxy Guidelines") that are reasonably designed to ensure that if is voting in the best interest of its Clients. Clients may obtain a copy of the Proxy Guidelines upon request. To obtain a copy of the Proxy Guidelines or to obtain information on how an account's securities were voted, Clients should contact their account representative. VWM's general policy is to vote proxies in accordance with the recommendation of an issuer's management on routine and administrative matters. With respect to nonrecurring matters, VWM will vote on a case-by-case basis in accordance with the goals of achieving a client's stated objective. If VWM determines that this policy does not adequately address any detected conflict of interest between VWM and a Client, VWM will notify the Client of the conflict and request that the Client consent to VWM's intended response to the proxy solicitation.

Clients should note that VWM will neither advise nor act on behalf of the Client in legal proceedings involving companies whose securities are held or previously were held in the Clients account(s), including, but not limited to, the filing of proofs of claim in class action settlements. If directed by the Client, VWM will transmit copies of class action notices to the Client or a third party.

#### **Item 18: Financial Information**

Neither VWM, nor its management have any adverse financial situations that would reasonably impair the ability of VWM to meet all obligations to its Clients. Neither VWM, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. VWM is not required to deliver a balance sheet along with this Disclosure Brochure, as the Advisor does not collect advance fees for services to be performed six months or more in advance.





**Form ADV Part 2B – Individual Disclosure Brochure for:**

Supervised Persons:

Goel A. Velázquez Rosa

CRD # 7189134

CFO/Investment Advisor Representative

Vauban Wealth Management, Corporation

Lot K2 Marginal Street Suite 201

Oasis Gardens Development

Guaynabo, P.R. 00969

Form ADV Part 2B Brochure Supplement March 7, 2020

**This Brochure Supplement provides information about the background and qualifications of Goel A. Velázquez Rosa (CRD # 7189134) in addition to the information contained in the Vauban Wealth Management (“VWM” or the “Advisor”) Disclosure Brochure. If you have not received a copy of this Brochure Supplement or have any questions about the contents of this Brochure Supplement or VWM’s Disclosure Brochure, please contact us at (939) 940-8529 or by email at [admin@vaubanwealth.online](mailto:admin@vaubanwealth.online). Additional information about Goel A. Velázquez Rosa available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

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

Goel A. Velázquez Rosa

**CRD # 7189134**

Born: 1992

Education: University of Puerto Rico, Mayaguez, P.R.

BA Business Administration, Accounting, May 2015

Certifications: Certified Public Accountant License #7363

Business: Vauban International Bank  
Financial Officer 11/2018- 1/2020

Master Group  
Accountant 9/2017 – 11/2018

H&R Block  
Income Tax Professional 1/2016 – 4/2016

Edward's Life Science Corp  
Accounting Intern 8/2014 – 12/2014

**Item 3: Disciplinary Information**

Registered investment advisors are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

**Item 4: Other Business Activities**

Mr. Goel Velazquez provides Accounting Services to non-financial entities. This Outside Business Activity does not create a material conflict of interest with the Clients and services provided by Vauban Wealth Management.

**Item 5: Additional Compensation**

This Item requires disclosures regarding additional compensation for providing advisory services received by the supervised person from someone who is not a Client. No information is applicable to this Item for Mr. Velazquez. All VWM employees are compensated via salary and bonus arrangements. Bonuses are determined by VWM management and not tied to Client account returns.

**Item 6: Supervision**

Mariela Torres serves as Chief Compliance Officer of VWM. Mrs. Torres has the responsibility for supervising supervised persons. Mrs. Torres can be reached at (939) 940-8529. VWM has implemented a Code of Ethics and internal compliance policies that guide each employee in meeting their fiduciary obligations to Clients of VWM.



## Privacy Policy

### **Our Commitment to You**

Vauban Wealth Management (“VWM” or the Advisor) is committed to safeguarding the use of personal information of our Clients (also referred to as “you” and “your”) that we obtain as your Investment Advisor, as described here in our Privacy Policy (“Policy”). Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. VWM (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you. VWM does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below. Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### **Why you need to know?**

Registered Investment Advisors (“RIAs”) must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### **What information do we collect from you?**

Personal information that collect may include, but is no limited to: Driver’s license number, Date of birth, Social security or taxpayer identification number, Assets and liabilities , Name, address, phone number(s), Income and expenses, E-mail address(es), Investment activity, Account information (including other institutions), Investment experience and goals.

### **What Information do we collect from other sources?**

VWM may collect information needed to service your account. The information we collect may include, but is no limited to: Custody, brokerage and advisory agreements; Account applications and forms; Other advisory agreements and legal documents; Investment questionnaires and suitability documents; Transactional information with us or others.

### How do we protect your information?

To safeguard your personal information from unauthorized access and use, we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information. We require third parties that assist in providing our services to you to protect the personal information they receive from us.

### How do we share your information?

We may need to share client personal information in order to effectively implement our services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
<b>Marketing Purposes</b> VWM does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where VWM or the client has a formal agreement with the financial institution. We will only	No	Not Shared

share information for purposes of servicing your accounts, not for marketing purposes.		
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
<b>Information About Former Clients</b> VWM does not disclose and does not intend to disclose, nonpublic personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

**Changes to our Privacy Policy** We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing. **Any Questions?** You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (787)-522-6776.