



PROTECTING CAPITAL. BUILDING WEALTH.

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ADV Part 2A and 2B

Date of Brochure March 2021

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. 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 January 6, 2021:

Item 4 – Information on Regulatory Assets under Management has been updated and Information on Primary Advisory Service has been updated, references to Fidelity Brokerage Services have been added and Alternative Investment Reporting has been removed.

Item 5 –Fee Schedule information has been updated.

Item 14 - Information related to the TD Ameritrade Additional Services Addendum has been removed and Information related to Fidelity Brokerage Services has been added.

Item 15 – Information related to Custody Services has been updated.

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 \$ 284,955,165 as of December 31, 2020. \$264,781,825 are managed on a discretionary basis and \$20,173,340 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.

Vigilare Wealth Management, LLC (“VWM”) offers clients a comprehensive range of services (each a “Service” and collectively the “Services”) that support both short and long-term goals. VWM acts as the central point of contact for the various Services in carrying out the objectives of the Client. Upon execution of a power of attorney (“POA”), VWM may engage, hire, retain and employ, in the name and for the Account of Client, such lawyers, accountants and other professionals as are necessary in the ordinary course of performing Services on behalf of Client.

Depending upon the needs and objectives of the Client, VWM’s Services may include some or all of the following Services:

Financial Oversight and Recordkeeping Services

i. Expense Oversight:

This Service includes gathering agreements, contracts, and invoices that require regular payment, organizing these invoices into payment schedules. Establishing checking accounts and other types of accounts needed to pay these invoices and coordinating payment. These payments may include quarterly tax payments, insurance payments, distributions to shareholders, mortgage payments, management fees and other payments.

ii. Cash Flow Oversight:

This Service includes developing twelve (12)-month cash flow projections, updating cash flow projections on a monthly basis, and the validation of cash inflow and outflows against supporting documentation.

iii. Record Management and Retention:

This Service includes creating the documents and files necessary to support the operation of a family office as required including maintaining a general ledger and account records and other files as needed.

Integrated Wealth Management Services

With a comprehensive view of your financial and lifestyle requirements, we work with you to establish wealth transfer and tax minimization plans to help assure family continuity and governance, address executive compensation and benefits issues, and formulate a strategic financial plan and other wealth management strategies.

Client acknowledges that he/she/it is under no obligation to implement any recommendations made by VWM as part of a financial plan, either independently or through VWM or its affiliates. If Client wishes to implement any such recommendations, Client may select any brokerage firm, private investment firm, insurance agency, broker, or carrier, bank, or any other financial Service institution to implement Client's decisions.

Should Client choose to implement such recommendations through VWM and/or its affiliates, Client should realize that this presents a conflict of interest in that VWM will charge separate fees for implementing such recommendations (see "Investment Oversight Services" below), and consequently, the objectivity of the advice rendered to Client could be biased. Furthermore, Client understands that investment adviser representatives ("IARs") of VWM and/or its affiliates sell insurance products in their separate capacities as independent insurance agents for firms not affiliated with VWM. When these IARs implement insurance transactions in these separate capacities, they earn additional compensation. This presents a conflict of interest since IARs could earn fees and commissions for implementing recommendations made as part of a financial plan. Client understands that he/she/it is free to select any insurance agent or insurance provider they wish to implement any recommendations.

Investment Management Services

Our Investment Management Services are based on a dynamic asset allocation strategy. Through this service, VWM 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.

Third-Party Investment Managers

We may utilize unaffiliate, independent third-party investment managers ("TPIMs") to manage some or all of Client assets if we determine such action to be in the best interest of the Client. When recommending Client to a TPIM, the Firm will (i) gather such information as investment objectives, risk tolerance, investment guidelines, time horizons and other important and necessary information relating to the Client's assets; (ii) based upon such information, determine appropriate allocations of Client's assets; and (iii) recommend one or more TPIMs whose management style and strategies are consistent with Client's objectives and financial profile.

Clients may be required to enter into an advisory agreement with a TPIM, which will be in addition to and, and distinct from the agreement with VWM. TPIMs will typically have discretionary authority over the assets allocated for management, and authorized to buy, sell, and trade in securities in accordance with the Client's investment objectives and/or selected investment strategy. VWM shall provide information and/or documentation to the TPIM relative to the Client's investment objective(s), initially when the Client account is opened, and anytime the Client informs the Firm of any change to their investment objectives. VWM's fees typically include those fees associated with allocating Client assets to designated TPIMs. Please refer to the "Fees" section in Item 5 below for important information about fees.

Other Services

VWM provides other services, including Personal CFO/Executive Services, Tax and Accounting Services, Real Estate Services, Executive and Family Assistance, Philanthropic Support, Estate and Gift Planning and Trustee Services. These services are offered under separate engagement and Clients will need to enter into separate agreements for these services.

General Information About Your Account

Prior to engaging VWM 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 a 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 VWM. The selected broker/dealer(s) provide custody, clearing, and other brokerage services including regular basic statement reporting. Clients will be required to establish a brokerage account(s) through this broker/dealer for all discretionary asset management services. VWM 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 VWM's relationship with TD Ameritrade Institutional and Fidelity Brokerage Services.

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 ETFs seek a multiple of the return of a benchmark for a single day only. Leveraged ETFs are riskier than other alternatives that do not use leverage. We invest in leveraged ETFs 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 VWM 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 VWM 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

Investment Management Services

VWM fee schedule:

<i>Fee Schedule for Investment Management Services</i>	Maximum Annual Fee
First \$1 million	1%
Over \$1,000,001	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, including cash and cash equivalents, as of the close of business on the last business day of the preceding calendar quarter. Clients may elect to designate a single account to be billed for all services. Fees will be calculated using the average daily balance. If average daily balance information is not available, then fees will be calculated using account data as of the end of the quarter. 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.

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. VWM 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.

Sub-Advisory Fees

As discussed above, there will be occasions where an unaffiliated third-party Investment Manager manages some or all of Client assets. In those circumstances, the third-party investment manager 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. VWM will accept accounts that are self-directed. These accounts will not be charged a management fee, 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 VWM are negotiable. Negotiating factors include the total amount of assets under VWM's management, the number of accounts being managed, the degree of discretionary authority granted to VWM, the client's overall financial situation and complexity, and other conditions and factors applicable to each individual client. At VWM'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 VWM. 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. It is the responsibility of VWM, 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 VWM via check, automated bill payment, or similar alternative service. Payment is due upon receipt of the quarterly billing statement as presented by VWM.

Broker/dealers have different account fees, execution charges and execution capabilities. Clients using the broker/dealer selected by VWM may pay higher account-related fees and execution charges than if we had selected another custodian. VWM 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. VWM will not receive any portion of such commissions or fees.

In addition, clients may incur certain charges imposed by third parties other than VWM in connection with investments recommended by us. Management fees charged by VWM 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 Investment 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 VWM , and is owned by the managing members of VWM , Zeljko Jag Zdrle and Jason Scott Polit. Currently, Athlete Society, LLC is inactive.

Insurance Agents:

IARs of VWM 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 VWM 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

VWM 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

VWM 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. VWM 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 affected 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 VWM 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 VWM will do so in accordance with the parameters set forth in the SEC No-Action Letter, *SMC Capital, Inc.* It should be noted, VWM 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. VWM 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 VWM 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 VWM, 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.

Additional Compensation

As disclosed under Item 12 above, VWM participates in TD Ameritrade's institutional customer program and we could 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.

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 TD Ameritrade 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 TD Ameritrade 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.

VWM is deemed to have custody of client funds and securities whenever VWM is given the authority to have fees deducted directly from client accounts. It should be noted that authorization to trade in client accounts is not deemed by regulators to be custody.

VWM provides trustee services to assist client in meeting long-term estate planning goals. In these arrangements, VWM serves as trustee and also provides investment advisory services to these clients. In addition to the investment management fees, VWM charges trustee fees for these accounts.

Under SEC Rule 206(4)-2, the “Custody Rule”, VWM is deemed to have custody as a result of these trustee services. For accounts in which VWM 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 VWM. When clients have questions about their account statements, they should contact VWM or the qualified custodian preparing the statement.

Item 16 – Investment Discretion

Discretionary Trading Authorization

We provide our Investment Management Services on a discretionary basis. Our discretionary authority will be granted by the client in the Investment Management Services Agreement. When discretionary authority is granted, it is limited in that client will only be granting VWM 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 VWM 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 VWM.

Item 17 – Voting Client Securities

VWM 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 VWM. 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 2021

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.

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 2021

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.

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

Please see Item 10 of this Disclosure Brochure for details regarding 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 2021

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.

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 2021

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.

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. Mr. Delcarlo had disciplinary information that was resolved many years prior to his employment with our firm. 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.*