

Paradigm Wealth Management LLC
Form ADV Part 2A
March 30, 2011

Paradigm Wealth Management LLC
27865 Clemens Road
Suite 1A
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This brochure provides information about the qualifications and business practices of Paradigm Wealth Management LLC. If you have any questions about the contents of this brochure, please contact our Chief Compliance Officer, Douglas Kuhlman, by telephone (440) 892-5900 and/or email dougkuhlman@paradigmwealthmgmt.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Paradigm Wealth Management LLC is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Paradigm Wealth Management LLC had no material changes.

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Item 4 Advisory Business

Paradigm Wealth Management is an independent personal wealth management firm established in 2008. Our advisory service is geared to those seeking a holistic approach to their family's wealth management goals & objectives.

Paradigm Wealth Management offers the individualized service everyone should expect from a financial professional, beginning with detailed discussions to learn clients' particular needs and desires. Once we have reached an understanding and agreed upon an Investment Policy Statement, we utilize a broad array of products to suit your particular needs.

The shareholder/director of Paradigm Wealth Management is Douglas Kuhlman

At Paradigm we focus on the holistic wealth management concept. Our client portfolios are invested in equities, fixed income, alternative investments, and money markets. Since no one personal or family is identical, we tailor our approach to each individual investor. We utilize and investment policy statement with each client that sets the desired asset allocation strategy for each investor. Paradigm will take into account that some clients may not want to participate in certain asset classes and or sectors that does not coincide with their religious or personal code of ethics.

As of 12/31/2010, Paradigm Wealth Management LLC managed a total of \$60,000,000 on a discretionary basis and approximately \$20,000,000 on a non-discretionary basis.

Item 5 Fees and Compensation

As an independent, fee only wealth manager, Paradigm does not accept commissions, mutual fund loads, mutual fund 12b-1 fees, or any other compensation from anyone else other than our clients directly. Our general guidelines when establishing these annual fees are based on the table below:

Assets	Annual Fee
Assets Up To \$500,000	1.00%
Assets \$500,000 – \$2,000,000	0.75%
Next \$2,000,000 - \$5,000,000	0.65%
Next \$5,000,000 - \$10,000,000	0.50%
Assets Over \$10,000,000	0.30%

Paradigm Wealth Management deducts its fees directly from client accounts. Our fees are deducted on a quarterly basis. They are calculated by using the average daily value of the client account.

Since assets are kept at large custodians, equity trades will generate a commission for that custodian that is also deducted out of the client account. Also, when investing in mutual funds and ETF's, there are fees that are associated with those investments. Being that we receive no compensation from those mutual funds or ETF's, we only invest in those instruments when we feel it is the best choice for our clients.

Since our clients do not have to pay for any fees in advance, there no pre-paid fees. We deduct our fee in arrears by using the previous quarter's average daily value.

Again, we have no conflict of interest when purchasing mutual funds or ETF's.

Item 6 Performance-Based Fees and Side-by-Side Management

Performance –Based Fees and Side-by-Side Management of accounts is not applicable to Paradigm Wealth Management LLC.

Item 7 Types of Clients

Paradigm Wealth Management offers investment supervisory services on a discretionary/non-discretionary basis to many different types of entities. Our relationships include, but are not limited to the following groups:

- Individual Investors
- Accredited Investors
- Trusts
- Estates
- Charitable Organizations
- Limited Liability Corporations
- Corporate Accounts

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

Item 9 Disciplinary Information

Paradigm Wealth Management has no material legal or disciplinary events to disclose related to its advisory business or management.

Item 10 Other Financial Industry Activities and Affiliations

Paradigm Wealth Management does not have anyone who is registered, or have an application pending to register, as a broker-dealer or registered representative of a broker-dealer.

Paradigm Wealth Management does not have anyone registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Paradigm Wealth Management does not have any material relationship or arrangement with any of the following entities:

1. Broker-dealer, municipal securities dealer, or government securities dealer or broker
2. Investment Company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
3. Other investment adviser or financial planner
4. Futures commission merchant, commodity pool operator, or commodity trading advisor
5. Banking or thrift institution
6. Accountant or accounting firm
7. Lawyer or law firm
8. Insurance company or agency
9. Pension consultant
10. Real estate broker or dealer
11. Sponsor or syndicator of limited partnerships

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Paradigm Wealth Management has adopted this code of ethics (the "Code of Ethics") in compliance with Rule 204A-1 under the Advisers Act in order to specify the standard of conduct expected of its Associated Persons. The Firm will describe its Code of Ethics to clients in writing and, upon request, furnish clients with a copy of the Code of Ethics.

All Associated Persons of Paradigm Wealth Management must comply with applicable federal securities laws. In particular, it is unlawful for the Firm and any Associated Person, by use of the mails or any means or instrumentality of interstate commerce, directly or indirectly:

- To employ any device, scheme or artifice to defraud any client or prospective client of the Firm;
- To engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon any client or prospective client of the Firm; or
- To engage in any fraudulent, deceptive, or manipulative practice.

In adopting this Code of Ethics, Paradigm recognizes that it, and its affiliated persons owe a fiduciary duty to the Firm's client accounts and must (1) at all times place the interests of Firm clients first; (2) conduct personal securities transactions in a manner consistent with this Code of Ethics and avoid any abuse of a position of trust and responsibility; and (3) adhere to the fundamental standard that Associated Persons should not take inappropriate advantage of their positions. In addition, the Firm and its Associated Persons must comply with all applicable federal securities laws, which shall generally be explained in the Firm's Compliance Manual. Associated Persons must report any violations of the Code of Ethics to the Firm's Chief Compliance Officer.

DEFINITIONS

"Access Person" means any supervised person of the Firm:

- (i) Who has access to nonpublic information regarding any clients' purchase or sale of securities;
- (ii) Who is involved in making securities recommendations to clients, or who has access to such recommendations that are nonpublic;
- (iii) Because the Firm's primary business is providing investment advice, all of the Firm's directors, officers and partners are presumed to be access persons; or
- (iv) Such other persons as the Chief Compliance Officer shall designate.

“Acquisition” or **“Acquire”** includes any purchase and the receipt of any gift or bequest of any Reportable Security.

“Affiliate Account” means, as to any Access Person, an Account:

- (i) Of any Family Member of the Access Person;
- (ii) For which the Access Person acts as a custodian, trustee or other fiduciary;
- (iii) Of any corporation, partnership, joint venture, trust, company or other entity which is neither subject to the reporting requirements of section 13 or 15(d) of the Securities Exchange Act of 1934 nor registered under the Investment Company Act of 1940 (the “Company Act”) and in which the Access Person or a Family Member has a direct or indirect Beneficial Ownership; and
- (iv) Of any Access Person of the Firm.

“Associated Person” of the Firm means any Access Person, and any employees, including independent contractors who perform advisory functions on behalf of the Firm.

“Automatic investment plan” means a program in which regular periodic purchases (or withdrawals) are made automatically in (or from) investment accounts in accordance with a predetermined schedule and allocation. An automatic investment plan includes a dividend reinvestment plan.

“Beneficial Ownership” means a direct or indirect “pecuniary interest” (as defined in Rule 16a-1(a)(2) under the 1934 Act that is held or shared by a person directly or indirectly (through any contract, arrangement, understanding, relationship or otherwise) in a Security. This term generally means the opportunity directly or indirectly to profit or share in any profit derived from a transaction in a Security. An Access Person is presumed to have Beneficial Ownership of any Family Member’s account.

“Client Account” means any account for which the Firm provides services, including investment advice and investment decisions.

“Control” has the same meaning as in section 2(a)(9) of the Company Act. Section 2(a)(9) defines “Control” as the power to exercise a controlling influence over the management or policies of a company, unless this power is solely the result of an official position with the company.

“Disposition” or **“Dispose”** includes any sale and the making of any personal or charitable gift of Reportable Securities.

“Family Member” of an Access Person means:

- (i) That person’s spouse or minor child who resides in the same household;

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- (ii) Any adult related by blood, marriage or adoption to the Access Person (a “relative”) who shares the Access Person’s household;
- (iii) Any relative dependent on the Access Person for financial support; and
- (iv) Any other relationship (whether or not recognized by law) which the Chief Compliance Officer determines could lead to the possible conflicts of interest or appearances of impropriety this Code of Ethics is intended to prevent.

Item 12 Brokerage Practices

Paradigm Wealth Management does not have formal or informal soft dollar contracts. Our clients dictate the selection of custodian for their personal investments. In the void of not having a preferred custodian, Paradigm Wealth Management may recommend a custodian to the client.

Paradigm Wealth Management does have an arrangement with National Financial Services LLC and Fidelity Brokerage Services LLC (collectively, and together with all affiliates, "Fidelity") through which Fidelity provides Paradigm with "institutional platform services." Fidelity also offers other services intended to help Paradigm Wealth Management manage and further develop its advisory practice. Such services include, but are not limited to, performance reporting, financial planning, contact management systems, third party research, publications, access to educational conferences, roundtables and webinars, practice management resources, access to consultants and other third party service providers who provide a wide array of business related services and technology with whom Paradigm Wealth Management may contract directly.

Paradigm Wealth Management does not aggregate trades at Fidelity or any other custodian. Each trade is done in each account separately.

Item 13 Review of Accounts

At Paradigm Wealth Management, the review of client accounts is an ongoing process. Changes in client portfolios can occur based on macroeconomic events or on increases/decreases to the certain asset and/or sector moves. Clients are invited to participate on an individualized quarterly review with their portfolio manager (William Keller). Mr. Keller currently oversees approximately 45 households.

We have partnered with Black Diamond Technologies which enables our clients to view their holistic portfolio on a daily basis. We also produce, through Black Diamond, a quarterly report that allows clients to view their portfolio performance vs. their mutually agreed upon blended benchmark. These reports are available online.

Item 14 Client Referrals and Other Compensation

Paradigm Wealth Management does not provide any economic benefit to any firm for providing investment advice or other advisory services to our clients.

Paradigm Wealth Management does not provide any economic benefit to any individual for client referrals.

Item 15 Custody

It is the Firm's policy not to accept physical custody of clients' securities, funds or assets. Notwithstanding the foregoing, the Firm acknowledges that it may be deemed to have custody under the Advisers Act and the Rules.

Advisers who have custody of client funds or securities are generally required to maintain all client assets with a qualified custodian as defined in the Rules, such as broker-dealers, trust companies, and banks ("Qualified Custodian"), and either:

- Have a reasonable belief that the custodian will deliver quarterly statements directly to clients; or
- Deliver quarterly statements, themselves (the adviser), so long as they have an independent public accountant conduct an annual surprise examination to verify the clients' assets.

Paradigm Wealth Management does:

- Arrange for the client assets to be maintained by one or more Qualified Custodians;
- Require all Qualified Custodians holding client assets to segregate and identify each client's securities;
- Notify each client of the place and manner in which his or her assets are maintained; and
- Have a reasonable belief that the Qualified Custodian will transmit, to each client, a statement showing account activity, at least quarterly. Otherwise, the Firm must directly deliver quarterly account statements to clients and shall arrange for an independent public accountant to conduct an annual surprise examination to verify the clients' assets.

Item 16 Investment Discretion

Paradigm Wealth management does accept discretionary authority to manage securities accounts on behalf of our clients. Even though our communication with our clients is continuous throughout the calendar year, we prefer to have the right to execute trades. Trade confirmations are emailed or mailed directly to the client to inform them of the transaction. These mailings or emails are done directly by the custodian and not by Paradigm Wealth Management.

We also offer a non-discretionary agreement for those clients who prefer to speak to us prior to trades being placed in their account.

Item 17 Voting Client Securities

Paradigm Wealth Management may offer assistance, upon client request, when dealing with voting on client securities. However, Paradigm has no authority to vote proxies on behalf of our clients. Our clients receive proxy information directly from their custodian.

It is up to our clients as to how they wish to vote and/or choose to ascertain our guidance regarding the proxy.

Item 18 Financial Information

Paradigm Wealth Management does not require or solicit prepayment of more than \$1,200 in fees per client six months or more in advance.

Paradigm Wealth Management has no financial condition that is reasonably likely to impair our ability to meet contractual commitments to clients.

Paradigm Wealth Management has not been the subject of a bankruptcy petition at any time during the past ten years.