



Item 1 – Cover Page

**Paragon Capital Management Corp.
Form ADV Part 2A Disclosure Brochure
10 Edgewood Avenue
Smithtown, NY 11787**

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This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Paragon Capital Management Corp. (“PCM” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (631) 863-2700. 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.

Additional information about PCM is also available on the SEC’s website at www.advisorinfo.sec.gov by searching with our firm name or CRD# **107486**.

PCM is a registered investment adviser; registration does not imply a certain level of skill or training.

Updated: March 4, 2017

REGISTERED INVESTMENT ADVISOR

Paragon Capital Management 10 Edgewood Avenue Smithtown, New York 11787
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Item 2 – Material Changes

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of PCM.

PCM believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. PCM encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

There have been no material changes to this Disclosure Brochure since the last distribution to Clients.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of PCM.

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.

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Item 4 – Advisory Business

A. Firm Information

Paragon Capital Management Corporation, ("PCM" or the "Advisor") is an investment adviser registered with the State of New York. Walter F. Wisniewski, Jr., CFP® is the founder, CEO, sole principal owner and President of Paragon Capital Management since inception in 1991.

B. Advisory Services Offered

PCM provides services in two broad categories: financial planning services and investment management/advisory services to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations (each a "Client").

Investment Management Services

PCM provides specialized investment management services, investing the assets of the Client's investment portfolio by selecting mutual funds and individual securities. A Client's investment portfolio is constructed from the Client's goals, objectives and risk tolerance. PCM provides investment consultation services; investment selection and monitoring of mutual fund portfolios, and assists the client in implementing a strategy for the Clients' overall investment objectives. From time to time, PCM may make changes in the selection or allocation of investment alternatives. This may be done on a discretionary or non-discretionary basis depending on the agreement with the client. The investments selected by PCM predominately include Dimensional Fund Advisors ("DFA") and Schwab One-Source mutual funds, and PCM implements a long-term investment strategy which has been designed to result in low investment turnover.

Financial Planning Services

PCM offers financial and retirement planning to its Clients. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation based on the Client's financial goals and objectives. Financial planning addresses the following areas: retirement, college education, and other goal funding; income tax planning; life, disability, long-term care, homeowners and automobile insurance; and estate planning.

Clients of PCM can also receive investment advice on a more limited basis. This may include advice on certain areas of interest or need such as estate planning, retirement, 401(k) or 403(b) investment allocations or any other specific topic.

Financial planning recommendations may pose a potential conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to effect the transaction through the Advisor.

C. Client Account Management

Prior to engaging PCM to provide investment advisory services, each Client is required to enter into an Investment Advisory Agreement with the Advisor that defines the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Asset Allocation – PCM will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – PCM will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – PCM will provide investment management and ongoing oversight of the Client's portfolio and overall account.

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D. Wrap Fee Programs

PCM does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by PCM.

E. Assets Under Management

Client assets are managed on both a discretionary and non-discretionary basis. At the inception of each Client relationship or upon request, PCM will document any Client requested restrictions to be applied to the management of their account.

Assets under management as of December 31, 2016:

Discretionary: \$8,713,042
Non-Discretionary: \$6,268,070
Total Managed: \$14,981,112

Item 5 – Fees and Compensation

PCM is a fee-only advisor. In other words, PCM receives compensation exclusively from its Clients, and does not receive commissions or referral fees from any product or service providers.

A. Fees for Advisory Services

Investment Management Services

For discretionary and non-discretionary investment management services, PCM's fees are based on a percentage of assets under management. Fees for Investment Management Services are negotiable and currently range from 0.50% to 2.50% percent per year based on assets under management and the complexity and needs of the account.

For certain Clients, PCM charges the advisory fee on the market value of some unmanaged securities as well as the value of some non-securities that are custodied in Client accounts.

Financial Planning Services

Financial planning services will be provided at an hourly rate of \$250 per hour. An estimate for total hours will be determined prior to establishing the Client relationship. The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client.

B. Fee Billing

Investment Management Services

Fees are calculated in arrears for the majority of PCM's Client accounts based on the market value of the managed assets on the last day of each client billing quarter. The first quarterly fee will be the end of the third month after investment advisory or financial planning services are provided to the Client. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with PCM at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting PCM to be paid directly from their accounts held by the Custodian as part of the Investment Advisory Agreement and separate account forms provided by the Custodian.

Clients generally authorize the custodian to debit the advisory fee from the account and pay it to PCM. Occasionally, PCM will ask a Client to pay the fee directly. PCM will send the Client an invoice showing the amount of the fee, the value of the Client's assets on which the invoice was based, and the specific manner in which

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the advisory fee was calculated. PCM sends this invoice to the Client at the same time as it sends the custodian instructions to debit the Client's account. The custodian sends a statement to the Client, at least quarterly, indicating any amounts disbursed from the account, including the amount of any advisory fee paid to PCM.

Financial Planning Services

Financial planning fees are invoiced upon completion of the agreed upon deliverable[s].

C. Other Fees and Expenses

PCM's fees exclude brokerage commissions and custodial fees. In addition, all fees paid to PCM for investment advisory services are separate from the fees and expenses charged to shareholders by a mutual fund company. A complete explanation of the expenses charged by the mutual fund is contained in each fund's prospectus. Further information addressing PCM's brokerage practices is disclosed in Item 12 of this brochure.

D. Advance Payment of Fees and Termination

Investment Management Services

Investment management services may be terminated upon 30 days written notice by either the Client or PCM. Upon notice provided to PCM, unearned fees paid in advance to PCM will be ratably refunded. Clients may terminate the Advisory relationship during the first 5 days at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client.

Financial Planning Services

PCM may be partially compensated for its financial planning services in advance of the engagement. Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party. In addition, the Client may terminate the agreement within five (5) business days of signing the Advisor's financial planning agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid financial planning fees.

E. Compensation for Sales of Securities

PCM does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

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

PCM does not charge any performance-based fees, that is, fees based on a share of capital gains on or capital appreciation of Clients' assets.

PCM does not do any Side-by-Side management. Side-by-Side Management refers to managing some accounts that are charged a performance-based fee, and others that are charged an asset-based fee.

Item 7 – Types of Clients

PCM offers investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, and corporations. The relative percentage of each type of Client is available on PCM's Form ADV Part 1. These percentages will change over time.

PCM's ideal Clients are individuals and families with investment assets between \$1 million to \$10 million.

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PCM generally requires a minimum account size of \$500,000 in assets under management. While PCM's minimum account size are typically not negotiable, under varying circumstances one or both may be negotiated.

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

PCM uses globally diversified and balanced portfolios. PCM's basic philosophy is that the markets are efficient, and that it is not possible to outperform the market by making forecasts. Therefore, PCM does not choose individual securities that will outperform the market, nor does PCM forecast when the markets are going to go up or down, or which asset classes are likely to outperform other asset classes. PCM believes this approach typically leads to a tax-efficient, low-turnover portfolio.

Equity mutual funds are selected in the following asset classes: US Stocks, International Stocks, Emerging Markets Stocks, and Real Estate Stocks. Generally, the equity portion of the portfolio is small company-tilted and value-tilted, as based on the academic research of Eugene Fama, Kenneth French and others.

Fixed income securities and fixed income mutual funds are selected in the following asset classes: Short-Term Bonds, Intermediate-Term Bonds. Bonds should have high quality (rated BBB or above). Foreign bond mutual funds typically have the currency hedged to the US dollar.

Where possible, PCM uses the mutual funds of Dimensional Fund Advisors ("DFA"), a firm with a similar investment philosophy. The purchase and sale of each DFA mutual fund incurs a Charles Schwab transaction fee, thus using a low-turnover strategy also provides low fees for the client.

However, smaller accounts (generally under \$70,000) are too small to diversify in all of the asset classes using the transaction fee funds in a cost-effective manner. Therefore, PCM chooses Schwab One Source funds that have no transaction fees in the above asset classes. These funds are selected using the following criteria: passive (index) funds if possible, a history of no style drift, low expense ratio, low turnover, low (\$1) minimum purchase, and historic returns similar to the index return.

PCM believes that portfolios must be monitored regularly, and rebalanced when allocations have changed enough to significantly affect the targeted risk exposure of that portfolio.

While PCM employs all of these investment methodologies in an attempt to optimize the risk-adjusted returns of client portfolios, risk can never be eliminated. Investing in securities, including mutual funds, always involves risk of loss which clients should expect to bear. Specifically, client portfolios are exposed to the following primary risks.

- **Market Risk** – Economic, political, and issuer-specific events may cause the value of securities to rise or fall.
- **Small Company Risk** – Securities of small companies are often less liquid than those of large companies. As a result, small company stocks may fluctuate relatively more in price.
- **Foreign Securities and Currencies Risk** – Foreign securities prices may decline or fluctuate because of economic or political actions of foreign governments, and/or because of less regulated or less liquid securities markets. Investors holding these securities are also exposed to foreign currency risk (the possibility that foreign currency may fluctuate in value against the U.S. dollar).
- **Emerging Markets Risk** – Numerous emerging market countries have experienced serious economic and political problems. Stock markets in many emerging market countries are relatively small, expensive to trade and risky. Foreigners are sometimes limited in their ability to invest in, and withdraw assets from these markets.

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- **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.
- **Interest Rate Risk** – Fixed income securities are subject to interest rate risk because the prices of fixed income securities tend to move in the opposite direction of interest rates. In general, fixed income securities with longer maturities are more sensitive to these price changes.
- **Income Risk** – Income risk is the potential for a decline in the fund's income due to falling interest rates.
- **Inflation Risk** – Inflation risk, also called purchasing power risk, is the chance that the cash flow from an investment won't be worth as much in the future because of changes in purchasing power due to inflation.

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 Advisor.

Item 9 – Disciplinary Information

There have been no criminal or civil investment-related actions against PCM or any of its principals or employees, nor has it or any of its principals or employees been the subject of any violation of an investment-related statute or regulation. There also have been no administrative proceedings before the SEC or any other federal, state, or foreign regulatory authority causing PCM or any of its principals or employees to be denied authorization to act in any investment-related business or activity. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov and can be found by searching with our firm name or our CRD# [107486](#).

Item 10 – Other Financial Industry Activities and Affiliations

PCM is an independent investment advisory firm.

PCM is under common control with its affiliated SEC registered investment adviser, Arcadia Wealth Management, Corp. ("Arcadia" – CRD# 165504). Certain principals and Supervised Persons of PCM also serve in the same or similar capacity for Arcadia. PCM's principal place of business is the same as that of Arcadia. PCM may refer current or prospective clients to Arcadia for investment management services. Both PCM and Arcadia currently utilize open-end mutual funds to implement the investment recommendations for clients at both firms. Therefore, PCM and Arcadia do not currently have a conflict with the allocation of investment opportunities, or the placement and aggregation of orders. Discretionary purchases and sales of mutual funds for clients of both Arcadia and PCW will be completed on the same day with each client receiving the same price established after the market close on a daily basis. Should PCM identify any potential conflicts related to the placement of orders on behalf of clients of PCM and Arcadia, PCM will implement procedures to ensure all client transactions are placed in fair and equitable manner.

PCM is not a broker-dealer, futures commission merchant, commodity pool operator, or commodity trading adviser and there are no principals or employees who are registered representatives of any of these types of firms. PCM does not have any relationships or arrangements that could create a material conflict of interest for clients with any of the following: broker-dealer, municipal securities dealer, government securities dealer or broker, investment company or other pooled investment vehicle, other investment advisor or financial planner, futures commission merchant, commodity pool operator, or other commodity trading adviser, banking or thrift institution, accountant or accounting firm, lawyer or law firm, insurance company or agency, pension consultant, real estate broker or dealer, sponsor or syndicator of limited partnerships.

Mr. Lee Slater, who currently serves as employee of PCM also serves in the role of tax preparer with Popular Tax. Mr. Slater spends approximately 95% of his time fulfilling his duties with Popular Tax. Neither PCM nor its

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employee's receive compensation of any kind for potential referrals to Popular Tax and the services provided by Popular Tax are separate and distinct from the advisory services provided by PCM.

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

To avoid any potential conflicts of interest involving personal trades, PCM has adopted a Code of Ethics (the "Code"), which includes a formal code of ethics and insider trading policies and procedures. PCM's Code requires, among other things, that all persons associated with PCM (our "Supervised Persons"):

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, Clients, prospective clients, employers, employees, colleagues in the investment profession, and other participants in the global capital markets;
- Place the integrity of the investment profession, the interests of clients, and the interests of PCM above one's own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential conflict of interest;
- Conduct all personal securities transactions in a manner consistent with this policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities;
- Practice and encourage others to practice in a professional and ethical manner that will reflect credit on yourself and the profession;
- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve your professional competence and strive to maintain and improve the competence of other investment professionals.
- Comply with applicable provisions of the federal securities laws.

PCM's Code also requires Supervised Persons with access to Client account information (our "Access Persons") to report personal securities transactions on at least a quarterly basis, and provide PCM with a detailed summary of certain holdings (at the start of employment and annually thereafter) over which such Access Persons have a direct or indirect beneficial interest.

If PCM ever recommends a security in which it, or its Access Persons buy and/or sell for themselves, PCM will ensure that the price paid or received by its advisory clients for any investment shall not be affected by a buying or selling interest on the part of PCM or its Access Persons, or otherwise result in an inappropriate advantage to PCM or its Access Persons. **At no time will PCM or any Access Persons, transact in any security to the detriment of any Clients.**

A copy of PCM's Code shall be provided to any Client or prospective client upon request. To request a copy of our Code of Ethics, please contact us at (631) 863-2700.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

PCM does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services or the administrator for defined contribution accounts. The Client will select the broker-dealer or custodian to safeguard its client's assets and authorize PCM to direct trades to this custodian as agreed in the investment advisory agreement. Further, PCM does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

PCM uses Charles Schwab & Co. ("Schwab") for substantially all of its client's brokerage transactions. In addition to brokerage services, Schwab provides PCM's clients with valuable custodial, recordkeeping and research services.

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PCM, on a periodic and systematic basis, reviews its brokerage relationship with its broker-dealers to ensure that it is fulfilling its fiduciary duty to seek best execution on client transactions.

Research provided by Schwab may include furnishing advice, either directly or through publications or writings, as to the value of securities, the advisability of purchasing or selling specific securities and the availability of purchasers or sellers of securities; furnishing seminars, information, analyses and reports concerning issuers, industries, securities, trading markets and methods, legislative developments, changes in accounting practices, economic factors and trends and portfolio strategy; access to research analysts, corporate management personnel, industry experts, economists and government officials; comparative performance evaluation and technical measurement services and quotation services; and products and other services (such as third party publications, reports and analyses, and computer and electronic access, equipment, software, information and accessories that deliver, process or otherwise use information, including the research described above, and charitable activities) that assist the registrant in carrying out its responsibilities. Research received from brokers or dealers is supplemental to PCM's own research efforts.

PCM does not enter into agreements with brokers regarding specific amounts of brokerage as a result of the research provided. However, the commission rates generally paid by PCM's discretionary clients sufficiently allow executing brokers to provide PCM with fairly full array of normal research services. This may include information and products regarding the receipt of duplicate trade confirmations and account statements, trading desk access, the ability to aggregate clients' securities transactions, the ability to directly debit advisory fees from clients' accounts, receipt of compliance publications, access to mutual funds which generally require significantly higher minimum initial investments or are generally available only to institutional investors, access to research analysts and attendance at research seminars

PCM believes that it would obtain the research and other products and services provided by Schwab regardless of the amount of commissions it generates throughout the year.

Following are additional details regarding the brokerage practices of the Advisor:

1. *Soft Dollars* - Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. PCM participates in a soft dollar relationship with Schwab, where they can obtain additional benefits such as access to research and other technology platforms.

2. *Brokerage Referrals* - PCM does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

3. *Directed Brokerage* - All Clients are serviced on a "directed brokerage basis", where PCM will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the custodian, PCM 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 designated custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. PCM will execute its transactions through an unaffiliated broker-dealer selected by the Client. PCM may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage particular Client accounts.

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Item 13 – Review of Accounts

A. Frequency of Reviews

Accounts are monitored on a regular and continuous basis by PCM. Formal reviews are generally conducted at least annually or more or less frequently depending on the Client's needs. The President or Senior Financial planner conducts each portfolio review.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., PCM also reviews an account whenever there is a contribution or a withdrawal, and whenever PCM's computerized monitoring system indicates that the total value of a client's stock market investments has moved away by more than a pre-determined amount from its targeted percentage of the portfolio.

C. Review Reports

PCM provides a written asset and allocation report to clients. These reports are given at periodic in-person review meetings, mailed or emailed before periodic phone reviews, or mailed to the client without a review. The frequency of the reviews varies based on an agreement with the client and in coordination with varying service levels based on the amount of investment assets, advisory fees, and complexity of planning.

Schwab and/or other custodians also send the clients a confirmation of transactions, and a monthly or quarterly summary report of all transactions, holdings, contributions and withdrawals.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by PCM

Participation in Institutional Advisor Platform

PCM receives an economic benefit from Schwab in the form of the support products and services it makes available to PCM and other independent investment advisors that have their clients maintain accounts at Schwab. These products and services, how they benefit PCM, and the related conflicts of interest are described above (see Item 12 – Brokerage Practices). The availability to PCM of Schwab's products and services is not based on PCM giving particular investment advice, such as buying particular securities for our clients.

B. Client Referrals from Solicitors

PCM does not engage paid solicitors for Client referrals.

Item 15 – Custody

PCM does not accept or maintain custody of Client funds or securities, except for the authorized direct deduction of the Advisor's fee. All Clients must place their assets with a qualified custodian. Clients are required to select their own custodian to retain their funds and securities and direct PCM to utilize that custodian for the Client's security transactions. Clients should review statements provided by the account custodian and compare to any reports provided by PCM to ensure accuracy, as the custodian does not perform this review.

Walter F Wisniewski, Jr., in his role as President of our affiliated SEC registered investment adviser, Arcadia, acts as a trustee on a Client's irrevocable trusts. As trustee, Walter has limited custody of bank checking accounts owned by the trusts. The banks send a statement to the Client, at least quarterly, indicating any amounts disbursed from the account.

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Item 16 – Investment Discretion

PCM provides investment advisory services on a discretionary basis and a non-discretionary basis.

For discretionary clients, the clients give PCM the authority to determine, without specific consent, the securities to be bought or sold, the amounts and timing of those transactions. Clients may place restrictions on the types of investments in which PCM invests for their accounts.

The non-discretionary clients are typically 401(k) plan sponsors and their plan participants. Some 401(k) plans include “model portfolios” which determine which mutual funds should be used in which proportions.

Item 17 – Voting Client Securities

Although PCM may have discretionary authority to make investment decisions on behalf of the client, PCM will not exercise proxy or class action voting authority over the client securities. The obligation to vote the client proxies and class actions will always remain with the client. The client shall in no way be prohibited from contacting PCM for advice or information about a particular proxy or class action vote. However, PCM shall not be deemed to have proxy or class action voting authority solely as a result of providing such advice to the client.

Item 18 – Financial Information

PCM does not have any financial condition that would reasonably impair its ability to meet contractual commitments to clients. PCM is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

The President of PCM is Walter Wisniewski. Information regarding the formal education and background of Mr. Wisniewski is included in Item 2 of Form ADV Part 2B.

B. Other Business Activities of Principal Officer

Walter Wisniewski is also President of Arcadia Wealth Management, Inc., a registered investment advisor with CRD# 165504.

C. Performance Fee Calculations

PCM does not charge performance-based fees for its investment advisory services. The fees charged by PCM are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

Walter Wisniewski has not been the subject of any criminal or civil investment-related actions, or any violation of an investment-related statute or regulation. He has also not been the subject of any administrative proceedings before the SEC or any other federal, state, or foreign regulatory authority causing him to be denied authorization to act in any investment-related business or activity.

However, we do encourage you to independently view the background of Mr. Wisniewski on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his name or his CRD# 1125987.

E. Material Relationships with Issuers of Securities

Neither PCM nor Mr. Wisniewski has any relationships or arrangements with issuers of securities.

REGISTERED INVESTMENT ADVISOR

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