

# **Paradigm Wealth Advisory LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 25, 2019**

This Form ADV 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Paradigm Wealth Advisory LLC (“Paradigm” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (908) 745-7400.

Paradigm is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Paradigm to assist you in determining whether to retain the Advisor.

Additional information about Paradigm and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 283120.

**Paradigm Wealth Advisory LLC**  
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## Item 2 – Material Changes

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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 Persons of Paradigm.

Paradigm 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. Paradigm 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 following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- Item 4.B. The Advisor has refined its disclosures regarding the investments utilized in Client portfolios. Client portfolios are now primarily implemented utilizing low-cost, institutional mutual funds and exchange-traded funds. Certain Clients may have legacy positions in non-institutional mutual funds. Further, the Advisor may recommend that the Client invest in variable annuity contracts for additional income needs. Please see Item 4.B.
- Item 4.E. The Advisor has amended its assets under management disclosure to distinguish assets under management in accounts at the custodian from assets under management in underlying variable annuity sub-accounts.
- Item 5.A. The Advisor has clarified its disclosures regarding its fee billing practices. The Advisor does not aggregate Client accounts to achieve fee breakpoints as the Custodian requires that each account be assigned a specific fee. Please see Item 5.A.
- Item 5.C. The Advisor has clarified disclosures that certain Client may have investments in "no-transaction fee" ("NTF") mutual. Funds, which have no securities transaction costs, but do carry a higher overall expense ratio and higher cost to the Client as compared to institutional mutual fund shares. Please see Item 5.C.

### 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 Paradigm.

At any time, you may view the current Disclosure Brochure online at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 283120. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (908) 745-7400.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Paradigm Wealth Advisory LLC (“Paradigm” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”), which is organized as a limited liability company (“LLC”) under the laws of Delaware. Paradigm was founded in April 2016, and is owned by Paradigm Wealth Management Holdings LLC, which is owned by David Provinsal (Managing Partner and Chief Compliance Officer) and David Giegerich (Managing Partner). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Paradigm.

### **B. Advisory Services Offered**

Paradigm offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, charitable organizations and businesses (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

Paradigm provides customized investment management solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Paradigm works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create an investment strategy. Paradigm will then construct an investment portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds or options contracts to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Client portfolios will primarily be constructed using institutional mutual funds, exchange-traded funds (“ETFs”), individual equities, individual bonds, and/or variable annuities. Certain Client may have legacy investments in non-institutional mutual funds. The Advisor may also utilize other types of investments, as appropriate, to meet the needs of each particular Client. Client portfolios may be fully customized or use one or more of the Advisor’s investment strategies. The Advisor may retain legacy investments based on portfolio fit and/or tax considerations.

The Advisor’s investment strategies are comprised of several accounts managed in time-segmented strategies. The Advisor tailors the segments and overall Client strategy to the goals and overall situation of the Client. Clients accumulating wealth for retirement will have accounts that will differ from those in retirement. The Client’s accounts may include the use of variable annuity accounts. In such instances, the Advisor enters into a separate discretionary investment advisory agreement for the management of the variable annuity sub-accounts. There is no additional fee for the management of these accounts. Please see Items 5.E. and 10 below for additional information.

Paradigm’s overall investment approach is primarily long-term focused. As detailed above, the Advisor manages various accounts with different investment purposes and time horizon. Certain accounts may have more or less investment activity than other accounts as a result. This approach is designed to optimize the overall investment strategy. The Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Paradigm will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

The Advisor monitors Client accounts that hold non-institutional mutual funds to seek appropriate opportunities to

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convert the funds to an institutional share class, when available. The Advisor considers tax implications and the overall strategy for the Client when making decisions to convert shares.

Paradigm evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Paradigm may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Paradigm may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Paradigm may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will Paradigm accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement. For additional information, please see Item 12 – Brokerage Practices and Item 15 – Custody.

### Financial Planning Services

Paradigm will typically provide a variety of financial planning services to individuals and families, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. Generally, such financial planning services will involve preparing a financial plan based on the Client's financial goals and objectives. This planning may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, personal savings, education savings, insurance needs, and other areas of a Client's financial situation.

A financial plan developed for the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Paradigm may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For ad-hoc engagements, the Advisor may not provide a written summary. Plans are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

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 implement the transaction through the Advisor. Financial planning services may be included in an overall wealth management engagement or provided as a separate service, pursuant to the terms of the agreement with the Client.

### **C. Client Account Management**

Prior to engaging Paradigm to provide advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Paradigm will work with each Client to develop a custom investment strategy designed in connection with the Client's investment goals and objectives.
- Asset Allocation – Paradigm 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 – Paradigm will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Paradigm will provide its discretionary investment management and ongoing oversight of the Client's investment portfolios, including accounts held at the Custodian [as detailed in Item 12 and any applicable variable annuity sub-accounts.

#### **D. Wrap Fee Programs**

For some Clients, Paradigm may include the securities transaction fees together with investment advisory fees to provide the Client with a single, bundled fee structure. This combination of fees is typically referred to as a "Wrap Fee Program". Paradigm customizes its investment management services for Clients. This Wrap Fee Program Brochure is included as Appendix 1 to this Disclosure Brochure solely to discuss the fees and potential conflicts associated with a bundled fee. Please see Appendix 1 – Wrap Fee Program Brochure, which is always included with this Disclosure Brochure.

#### **E. Assets Under Management**

As of December 31, 2018, the Advisor has \$207,979,932 in Client assets, all of which are on a discretionary basis. The Advisor manages \$99,300,383 through the recommended Custodian, LPL Financial LLC. In addition, the Advisor also provides discretionary investment management for \$108,679,549 in variable annuity sub-accounts (Please see item 5.E. and 10 below). Clients may request more current information at any time by contacting the Advisor.

### **Item 5 – Fees and Compensation**

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into one or more agreements with the Advisor.

#### **A. Fees for Advisory Services**

##### Investment Advisory Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement[s]. Investment advisory fees are charged at an annual rate ranging from 0.50% to 1.75% depending on several factors, including the level of assets to be managed, the complexity of the services to be provided, the investment phase of the Client, and the overall relationship with the Advisor. Fees are based on the market value of assets under management in each account at the end of the prior quarter. The fee charged to each individual account will vary based on the level of assets in the respective account. Variable annuity sub-accounts managed by the Advisor are not charged an investment advisory fee. Please see Items 5.E. and Item 10 below.

The investment advisory fee in the first quarter of service is prorated from the inception date of the Client's account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Advisor does not aggregate Client accounts to achieve fee discounts across accounts. All securities held in accounts managed by Paradigm will be independently valued by the Custodian. Paradigm will not have the authority or responsibility to value portfolio securities.

##### Financial Planning Services

Paradigm offers financial planning services on either an hourly or fixed fee basis. Hourly engagements are at a rate of up to \$350 per hour. Fixed fee engagements are negotiated based on the expected number of hours to complete the engagement at the Advisor's hourly rate. Fees may be negotiable at the sole discretion of the Advisor, depending on the nature and complexity of services to be provided. Fees may also be included in an overall wealth advisory relationship. An estimate for total hours and/or costs will be determined prior to establishing the advisory relationship.

## **B. Fee Billing**

### Investment Advisory Services

Investment advisory fees are calculated by the Custodian and deducted from the Client's account[s]. The Client shall instruct the Custodian to automatically deduct the investment advisory fee from the Client's account[s] for each billing period and pay the investment advisory fee[s] to the Advisor. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Paradigm 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. Clients provide written authorization permitting advisory fees to be deducted by Paradigm 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.

### Financial Planning Services

Financial planning fees are invoiced up to fifty percent (50%) upon execution of the financial planning agreement with the balance due upon completion of the engagement deliverables. The Advisor may invoice the Client for financial planning fees or arrange for the deduction of planning fees from the Client's account[s] at the Custodian. Certain Clients may have their planning fees included with their overall investment advisory fees.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Paradigm, in connection with investments made on behalf of the Client's account[s]. Paradigm typically includes securities transactions costs as part of its overall advisory fees. Then inclusion of these fees into a single, bundled fee is considered a "Wrap Fee Program". Please see Item 4.D. above as the Appendix 1 – Wrap Fee Program Brochure for additional disclosure regarding investments in the Wrap Fee Program and related disclosures.

In addition, all fees paid to Paradigm for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee (12b-1 fee). Effective in July 2018, the Advisor primarily utilizes institutional share classes and ETFs in constructing Client portfolios. Certain Clients may have legacy positions remaining in their portfolio that are non-institutional share classes.

A Client may be able to invest in these products directly, without the services of Paradigm, but would not receive the services provided by Paradigm which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Paradigm to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

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

### Investment Advisory Services

Paradigm is compensated for its investment advisory services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's 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. The Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

### Financial Planning Services

Paradigm may be partially compensated for its financial planning services in advance the engagement. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the

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Advisor's 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 Client shall be responsible for planning fees based on the hours incurred or in the event of a fixed fee, the percentage of the engagement completed. The Advisor will refund any unearned, prepaid fees. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Paradigm 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.

##### Broker-Dealer Affiliation

Advisory Persons of Paradigm may also be registered representatives of LPL Financial LLC ("LPL Financial"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In one's separate capacity as registered representatives, Advisory Persons may implement securities transactions under LPL Financial using the business name Paradigm Wealth Management LLC ("PWM") and not through Paradigm (the registered investment advisor). In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products and commissions on variable annuities that are included in the Client's overall investment portfolio. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to Paradigm's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives may have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on your needs. We mitigate this conflict in two ways. First, Clients are under no obligation, contractually or otherwise, to purchase securities products through one of our Advisory Persons. Second, Paradigm will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Advisory Persons.

The Advisor may recommend the use of variable annuity products in connection with its investment management services. The Advisor does not receive any additional compensation for the use of these products. These products may be used 'to enhance the cashflow for a Client in retirement. Advisory Persons of the Advisor, in their separate capacity as registered representatives of LPL Financial, may recommend and implement one or more variable annuities for the Client. In such instances, the Advisory Person will receive a commission for these investments. The Advisor (Paradigm) does not receive any compensation for these investments. The Advisor will enter into a separate investment advisory agreement with the Client, at ZERO cost to the Client, for the ongoing discretionary investment management over the variable annuity sub-accounts. The Advisory will manage these investments in connection with the overall investment strategy designed for the Client. Please see item 4 for more details.

Please also see Item 10 for additional disclosures.

##### Insurance Agency Affiliation

Certain Advisory Persons may also be licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to you. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm. Please see Item 10.

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

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

Paradigm does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

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## **Item 7 – Types of Clients**

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Paradigm offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, charitable organizations and businesses. The amount of each type of Client is available on the Advisor's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor. Paradigm generally does not impose a minimum size for establishing a relationship. However, smaller accounts may be subject to different investment selection and strategies.

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

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

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

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Paradigm generally employs long-term investment strategies for its Clients, as consistent with each Client's financial goals and overall situation. Paradigm will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Paradigm may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

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

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Paradigm will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategies:

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### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

### ETF Risks

The performance of an ETF is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

### Mutual Fund Risks

The performance of a mutual fund is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

**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**

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**There are no legal, regulatory or disciplinary events involving Paradigm or any of its Supervised Persons.** Paradigm values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or CRD# 283120.

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

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### Broker-Dealer Affiliation

As noted in Item 5.E, Advisory Persons of Paradigm may also be registered representatives of LPL Financial conducting business under the name Paradigm Wealth Management LLC ("PWM"). In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory Person of Paradigm in one's separate capacity as a registered representative of LPL Financial. Neither Paradigm nor an Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative. As noted in Item 5.E., the Advisor will recommend that the Client engage the Advisor to provide discretionary investment management services for the underlying sub-accounts in variable annuities. The Advisor provides this service at no cost to the Client.

Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

### Insurance Agency Affiliations

As noted in Item 5.E, certain Advisory Persons of Paradigm may serve as licensed insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with Paradigm. As insurance professionals, Advisory Persons may receive customary commissions and other related

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revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made the Advisor or its Advisory Persons.

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

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

Paradigm has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Paradigm (herein our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Paradigm and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of our Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (908) 745-7400.

### **B. Personal Trading with Material Interest**

Paradigm allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Paradigm does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Paradigm does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Paradigm allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the code to address insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Paradigm may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Paradigm requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While Paradigm allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will any Supervised Person of Paradigm, transact in any security to the detriment of any Client.**

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## **Item 12 – Brokerage Practices**

### **A. Recommendation of Custodian[s]**

Paradigm does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the “Custodian”) to safeguard Client assets and authorize Paradigm to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Paradigm does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Paradigm does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a Custodian not recommended by Paradigm. Typically, Paradigm will recommend that Clients establish their accounts at LPL

Financial, where Paradigm has access to LPL Financial's systems, back office support, research and other benefits. While Paradigm receives these economic benefits from LPL Financial, we believe LPL Financial provides quality execution and related services for our Clients at competitive prices. Price is not the sole factor Paradigm considers in evaluating best execution and the recommendation of the Custodian. Paradigm also considers the quality of the brokerage services provided by LPL Financial, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. Clients are free to use whatever broker-dealer/custodian they choose to implement financial planning recommendations. For investment advisory services, Paradigm would be required to obtain permission to use a broker-dealer or custodian other than LPL Financial due to the oversight role LPL Financial assumes over the Advisory Persons. Please see Item 14.

The Advisor primarily invests Client accounts in institutional mutual funds and ETFs. Certain Client portfolios may have positions in non-institutional mutual funds, which often carry a higher expense ratio. Often these funds are no-transaction fee funds which allow the Advisor to trade the funds without incurring securities transaction fees. Please see Item 5.C. above the Wrap Fee Program Brochure below.

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

**1. Soft Dollars** - Soft dollars are revenue programs offered by a broker-dealer/custodian whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Paradigm does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from its relationship with LPL Financial. Please see Item 14 below.**

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

**3. Directed Brokerage** - All Clients are serviced on a "directed brokerage basis", where Paradigm will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective 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]). Paradigm will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## **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 Custodian. Paradigm will execute its transactions through the Custodian as authorized by the Client. Paradigm may (or may not) aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian 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.

## **Item 13 – Review of Accounts**

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

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Paradigm and/or the CCO. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

## **B. Causes for Reviews**

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Paradigm if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

## **C. Review Reports**

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

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

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### **A. Compensation Received by Paradigm**

Paradigm does not receive securities commissions from product sponsors, broker-dealers or any un-related third party. Paradigm may refer Clients to various third parties to provide certain financial services necessary to meet the goals of its Clients. Likewise, Paradigm may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

Paradigm has established institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support at a reduced or zero cost because the Advisor renders investment management services to Clients that maintain assets through these platforms. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a potential conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

Additionally, the Advisor may receive the following benefits from LPL Financial: financial start-up support; reimbursement to Clients for transfer costs to the platform/custodian; receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

#### *Transition Assistance Benefits*

LPL Financial provides various benefits and payments to Advisory Persons that are also registered representatives of LPL Financial when they are new to the LPL Financial platform to assist the representative with the costs (including foregone revenues during account transition) associated with transitioning their business to the LPL Financial platform (collectively referred to as "Transition Assistance"). The proceeds of such Transition Assistance payments are intended to be used for a variety of purposes, including but not necessarily limited to, providing working capital to assist in funding the Advisory Person's business, satisfying any outstanding debt owed to the Advisory Person's prior firm, offsetting account transfer fees (ACATs) payable to LPL Financial as a result of the Advisory Person's Clients transitioning to LPL Financial's custodial platform, technology set-up fees, marketing and mailing costs, stationary and licensure transfer fees, moving expenses, office space expenses, staffing support and termination fees associated with moving accounts.

The amount of the Transition Assistance payments are often significant in relation to the overall revenue earned or compensation received by the Advisory Persons at their prior firm. Such payments are generally based on the



size of the Advisory Person's business established at the prior firm and/or assets under custody on the LPL Financial. Please refer to the relevant Part 2B brochure supplement for more information about the specific Transition Payments your representative receives.

Transition Assistance payments and other benefits are provided to Advisory Persons of Paradigm in their capacity as registered representatives of LPL Financial. However, the receipt of Transition Assistance by such Advisory Persons creates conflicts of interest relating to Paradigm's advisory business because it creates a financial incentive for Paradigm's representatives to recommend that its Clients maintain their accounts with LPL Financial. In certain instances, the receipt of such benefits is dependent on the Advisory Person maintaining its Clients' assets with LPL Financial and therefore Paradigm has an incentive to recommend that Clients maintain their account with LPL Financial in order to generate such benefits.

Paradigm attempts to mitigate these conflicts of interest by evaluating and recommending that clients use LPL Financial's services based on the benefits that such services provide to the Clients, rather than the Transition Assistance earned by any particular Advisory Person. Paradigm considers LPL Financial's quality of the brokerage services, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm when recommending that Clients maintain accounts with LPL Financial. However, Clients should be aware of this conflict and take it into consideration in making a decision whether to custody their assets in a brokerage account at LPL Financial.

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

The Advisor or its Advisory Persons may compensate an unaffiliated solicitor (herein a "Solicitor") if a Client is introduced to the Advisor by a Solicitor. The Advisor may pay the Solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Advisers Act as well as any applicable state securities regulations. Referral fees are paid solely from the Advisor's investment advisory fee and does not result in any additional charges or higher fees to the Client. The Solicitor will provide the Client with a copy of the Advisor's Disclosure Brochure along with a Solicitor's Disclosure Statement containing the terms and conditions of the solicitation arrangement including compensation.

## **Item 15 – Custody**

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Paradigm does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a "qualified custodian". Clients are required to engage the Custodian to retain their funds and securities and direct Paradigm to utilize the Custodian for the Client's security transactions. Paradigm encourages Clients to review statements provided by the Custodian. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

## **Item 16 – Investment Discretion**

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Paradigm generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Paradigm. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Paradigm will be in accordance with each Client's investment objectives and goals.



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

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Paradigm does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

## **Item 18 – Financial Information**

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Neither Paradigm, nor its management, has any adverse financial situations that would reasonably impair the ability of Paradigm to meet all obligations to its Clients. Paradigm has not been subject to a bankruptcy or financial compromise. Paradigm 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.

# **Paradigm Wealth Advisory LLC**

## **Form ADV Part 2A Appendix 1 ("Wrap Fee Program Brochure")**

**Effective: March 25, 2019**

This Form ADV 2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices of Paradigm Wealth Advisory LLC ("Paradigm or the "Advisor")) when offering services where securities transaction fees are combined with investment advisory fees into single fee (a "wrap fee program"). If you have any questions about the contents of this Wrap Fee Program Brochure, please contact us at (908) 745-7400.

Paradigm is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Program Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Wrap Fee Program Brochure provides information through Paradigm to assist you in determining whether to retain the Advisor.

Additional information about Paradigm and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 283120.

## **Item 2 – Material Changes**

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This Wrap Fee Program Brochure discusses the Wrap Fee Program offered by Paradigm.

### Material Changes

There following material changes have been made to this Wrap Fee Program Brochure since the last filing and distribution to Clients:

- Item 4.B. The Advisor has clarified its disclosures regarding its fee billing practices. The Advisor does not aggregate Client accounts to achieve fee breakpoints as the Custodian requires that each account be assigned a specific fee. Please see Item 5.A.
- Item 4.B. The Advisor has clarified disclosures that certain Client may have investments in “no-transaction fee” (“NTF”) mutual. Funds, which have no securities transaction costs, but do carry a higher overall expense ratio and higher cost to the Client as compared to institutional mutual fund shares. Please see Item 5.C.

At any time, you may view the current Disclosure Brochure on-line at the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 283120. You may also request a copy of this Wrap Brochure at any time, by contacting us at (908) 745-7400.

## **Item 3 – Table of Contents**

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## Item 4 – Services Fees and Compensation

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### A. Advisory Services

Paradigm Wealth Advisory LLC (“Paradigm” or the “Advisor”) provides customized wealth advisory services for its Clients. The Paradigm Wrap Fee Program (the “Wrap Fee Program”) is an investment advisory program sponsored by Paradigm whereby Paradigm includes normal securities transaction fees with its investment advisory fees to provide Clients with a single overall fee.

The Paradigm Wrap Fee Program Brochure is provided solely as a disclosure when Paradigm includes securities transaction fees as part of its overall investment advisory fee (as detailed in Item 5 of the Disclosure Brochure).

Clients may be offered a fee structure that includes, as a single fee, the securities transaction costs for trading in Client accounts along with the investment advisory fees earned by Paradigm. The securities regulations often refer to such a structure as a “Wrap Fee Program”. While traditional Wrap Fee Programs are often rigid, pre-packaged investment programs, Paradigm customizes its investment strategies individually for its Clients.

**The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees with investment advisory fees.** This Wrap Fee Program Brochure will reference back to the Paradigm Disclosure Brochure in which this Wrap Fee Program Brochure is an Appendix.

Paradigm offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, and businesses (each referred to as a “Client”). Please see Item 4 of the Disclosure Brochure for details regarding Paradigm’s investment management services.

### B. Program Costs

Advisory Services provided by Paradigm pursuant to a wrap fee structure may cost the Client more or less than purchasing these types of investment management services separately. When Paradigm absorbs normal securities transactions fees, Paradigm may have a financial incentive to limit the transactions in Client accounts, as each trade will increase costs to Paradigm. The costs of the Wrap Fee Program vary depending on services to be provided be to each Client.

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement[s]. Investment advisory fees are charged at an annual rate ranging from 0.50% to 1.75% depending on several factors, including the level of assets to be managed, the complexity of the services to be provided, the investment phase of the Client, and the overall relationship with the Advisor. Fees are based on the market value of assets under management in each account at the end of the prior quarter. The fee charged to each individual account will vary based on the level of assets in the respective account. Variable annuity sub-accounts managed by the Advisor are not charged an investment advisory fee. Please see Items 5.E. and Item 10 below.

The investment advisory fee in the first quarter of service is prorated from the inception date of the Client’s account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Advisor does not aggregate Client accounts to achieve fee discounts across accounts. All securities held in accounts managed by Paradigm will be independently valued by the Custodian. Paradigm will not have the authority or responsibility to value portfolio securities.

Paradigm provides this Wrap Fee Program Brochure as Paradigm pays all typical securities transactions costs associates with Paradigm investment strategies. Certain Clients may have investments in “no-transaction-fee” (“NTF”) mutual funds. These funds does not result in a cost to the Advisor for trading in the Client’s account[s]. However, these funds do have a higher overall expense ratio and therefore a higher overall cost to the Client as compared to institutional mutual funds, in which the Advisor will incur transaction fees. Clients should only read this Wrap Fee Program Brochure in connection with Paradigm’s Disclosure Brochure.

### **C. Fees**

The Paradigm Wrap Fee Program includes typical securities trading costs incurred in connection with the discretionary investment management services provided by Paradigm. Securities transaction fees for Client-directed trades may be charged to the Client. As noted above, certain Clients may have investments in NTF mutual funds. These funds do not result in a cost to the Advisor for trading in the Client's account[s]. However, these funds do have a higher overall expense ratio and therefore a higher overall cost to the Client as compared to institutional mutual funds, in which the Advisor will incur transaction fees.

Clients engaging Paradigm under this Wrap Fee Program will typically pay a higher overall investment advisory fee, but will not be responsible for securities transaction fees for their accounts. Clients should discuss the expected level of trading in the Client's account[s] to determine whether to engage Paradigm under this Wrap Fee Program or pay for securities transaction fees separately. Fees may be negotiable at the sole discretion of Paradigm.

Clients may also incur certain fees or charges imposed by third parties, which are not included as part of the Wrap Fee. Such other fees, which may include wire transfer fees, small account fees and other fees charged by the Custodian are not included in Paradigm's Wrap Fee. Paradigm does not receive any portion of such fees.

In addition, all fees paid to Paradigm for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee as a shareholder in a fund. Please see Item 5.C. of the Disclosure Brochure.

### **D. Compensation**

Paradigm is the sponsor and portfolio manager of this Wrap Fee Program. Paradigm receives investment advisory fees paid by Clients for investment advisory services covered under this Wrap Fee Program.

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## **Item 5 – Account Requirements and Types of Clients**

Paradigm offers investment advisory services to individuals, high net worth individuals, families, trusts, estates, charitable organizations and businesses. Please see Item 7 of the Disclosure Brochure for additional information.

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## **Item 6 – Portfolio Manager Selection and Evaluation**

### **A. Portfolio Manager Selection**

Paradigm serves as the sponsor and portfolio manager for the Paradigm Wrap Fee Program. Paradigm does not select third-party advisors to manage the Wrap Fee Program.

### **B. Related Persons**

Paradigm personnel or affiliates serve as portfolio manager[s] for services under this Wrap Fee Program. Paradigm only manages this Wrap Fee Program. Paradigm does not act as portfolio manager for any third-party wrap fee programs.

### **C. Supervised Persons**

Paradigm Supervised Persons serve as portfolio managers for the Paradigm Wrap Fee Program described in this Wrap Fee Program Brochure. Please refer to the Items 4 and 8 of the Disclosure Brochure for details on the services provided by Paradigm. For information related to the background of Paradigm Supervised Persons, please see Items 9 and 11 of the Disclosure Brochure.

### Performance-Based Fees

Paradigm does not charge performance-based fees for its investment advisory services. The fees charged by Paradigm 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. Paradigm does not manage any proprietary investment

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#### **Paradigm Wealth Advisory LLC**

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<http://paradigmwealthmanagement.com>

funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients. Please see Item 6 of the Disclosure Brochure.

#### Methods of Analysis

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

As noted above, Paradigm generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Paradigm will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Paradigm may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

#### Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Paradigm will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals. Please see Item 8.B of the Disclosure Brochure.

#### Voting Client Securities

Paradigm does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. Paradigm will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

### **Item 7 – Client Information Provided to Portfolio Managers**

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Paradigm is required to describe the type and frequency of the information it communicates to any external managers that may be involved in managing its Clients' investment portfolios. Paradigm serves as the sole portfolio manager under this Wrap Fee Program and, as such, the Advisor has no information to disclose in relation to regarding this Item.

### **Item 8 – Client Contact with Portfolio Managers**

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There is no restriction on the Client's ability to contact Paradigm.

### **Item 9 – Additional Information**

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#### **A. Disciplinary Information and Other Financial Industry Activities and Affiliations**

##### Disciplinary Information

**There are no legal, regulatory or disciplinary events involving Paradigm or any of its Supervised Persons.** Paradigm values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 283120.

##### Other Financial Activities and Affiliations

**Broker-Dealer Affiliation** - Certain Advisory Persons of Paradigm may also be registered representatives of LPL Financial conducting business under the name Paradigm Wealth Advisory LLC ("PWM"). In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by an Advisory Person of Paradigm. Neither Paradigm nor an Advisory Person will

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**Paradigm Wealth Advisory LLC**  
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earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative. Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

*Insurance Agency Affiliations* – Certain Advisory Persons of Paradigm may serve as licensed insurance professionals. Implementations of insurance recommendations are separate and apart from an Advisory Person's role with Paradigm. As insurance professionals, Advisory Persons may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made the Advisor or its Advisory Persons.

## **B. Code of Ethics, Review of Accounts, Client Referrals, and Financial Information**

### Code of Ethics

Paradigm has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Paradigm (herein our "Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Paradigm and its personnel owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of our Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact us at (908) 745-7400.

### Personal Trading and Conflicts of Interest

Paradigm allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a potential conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. We have also adopted written policies and procedures to detect the misuse of material, non-public information. We may have an interest or position in certain securities, which may also be recommended to you. At no time, will Paradigm or any Supervised Person of Paradigm, transact in any security to the detriment of any Client. Please see Item 11 of the Disclosure Brochure for additional disclosures.

### Review of Accounts

Securities in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Paradigm and/or the Chief Compliance Officer. Formal reviews are generally conducted at least annually or more or less frequently depending on the needs of the Client.

The Client is encouraged to notify Paradigm if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

### Other Compensation

As noted throughout this Disclosure Brochure, Advisory Persons of Paradigm may also be registered representatives of LPL Financial and/or licensed insurance professionals. For information on the conflicts of interest this presents, and how we address these conflicts, please refer to the Item 10 of the Disclosure Brochure.

### Client Referrals from Solicitors

Paradigm may engage and compensate unaffiliated third party referral sources (a "solicitor") for Client referrals. Clients will not pay a higher fee to Paradigm as a result of such payments to a solicitor. The Advisor shall enter

into an agreement with the solicitor, which requires that full disclosure of the compensation and other conflicts is provided to the prospective client prior to or at the time of entering into the advisory agreement.

Financial Information

Neither Paradigm, nor its management, has any adverse financial situations that would reasonably impair the ability of Paradigm to meet all obligations to its Clients. Paradigm is not required to deliver a balance sheet along with this Disclosure Brochure, as Paradigm does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Dave T. Provinsal  
Managing Partner  
Chief Compliance Officer**

**Effective: March 25, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of David T. Provinsal (CRD# 3049055) in addition to the information contained in the Paradigm Wealth Advisory LLC ("Paradigm" or the "Advisor") Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradigm Disclosure Brochure or this Brochure Supplement, please contact us at (908) 745-7400.

Additional information about Mr. Provinsal is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3049055.

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**Paradigm Wealth Advisory LLC**  
1140 Highway 22 East, Suite 103, Bridgewater, NJ 08807  
Phone: (908) 745-7400 \* Fax: (908) 745-7404  
<http://paradigmwealthmanagement.com>

## Item 2 – Educational Background and Business Experience

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David T. Provinsal, born in 1973, is dedicated to advising Clients of Paradigm in his role as a Managing Partner and the Chief Compliance Officer. Mr. Provinsal attended Seton Hall University for three years. Additional information regarding Mr. Provinsal's employment history is included below.

### Employment History:

Managing Partner and Chief Compliance Officer, Paradigm Wealth Advisory LLC	04/2016 to Present
Registered Representative, LPL Financial LLC (Under the Business Name Paradigm Wealth Management LLC)	04/2016 to Present
Registered Representative, First Allied Securities, Inc.	11/2009 to 04/2016
Investment Advisor Representative, First Allied Advisory Services, Inc.	11/2009 to 04/2016
Regional Vice President, Genworth Financial	02/2002 to 11/2009

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Provinsal.*** Mr. Provinsal has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Provinsal. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Provinsal.*** However, we do encourage you to independently view the background of Mr. Provinsal on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 3049055.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Provinsal is also a registered representative of LPL Financial LLC ("LPL Financial"). In his separate capacity as a registered representative, Mr. Provinsal will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Provinsal or the Advisor. Neither Paradigm nor Mr. Provinsal will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Provinsal also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Provinsal's role with Paradigm. As an insurance professional, Mr. Provinsal may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Provinsal is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Provinsal or the Advisor.

## Item 5 – Additional Compensation

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Mr. Provinsal has additional business activities where compensation is received that are detailed in Item 4 above.

In connection with the transition of Paradigm's Clients to the LPL Financial custodial platform and Mr. Provinsal's association as a registered representative of LPL Financial, Mr. Provinsal received or will receive financial

transition support from LPL Financial in the form of a forgivable loan that may be forgiven over time depending on the length of his tenure with LPL Financial.

The amount of the loan, paid to Mr. Provinsal in April 2016, represents a substantial payment. Forgiveness of the loan, in whole or in part, is conditioned on Mr. Provinsal remaining affiliated with LPL and based on the amount of business Paradigm engages in with LPL Financial, including, but not limited to, the amount of Client assets Paradigm maintains with LPL Financial and/or using LPL Financial as the Custodian for a certain percentage of all new client accounts, and as such, Mr. Provinsal has a financial incentive to recommend that its clients maintain their accounts with LPL Financial.

We encourage you to discuss any such conflicts of interest with your representative before making a decision to custody your assets at LPL Financial.

The payment received Mr. Provinsal in addition to the production bonuses, stock options and other economic benefits that he is entitled to receive as a registered representative of LPL Financial. The amount of these payments are significant in relation to the overall revenue earned or compensation received by Mr. Provinsal at his prior firm. Such payments are generally based on the size of the representative's business established at his prior firm and/or assets expected to be under custody on the LPL Financial platform. As a result, Mr. Provinsal has a financial incentive to recommend that clients establish an account with LPL Financial. This financial incentive creates a conflict of interest in connection with Mr. Provinsal's recommendation of LPL Financial.

## **Item 6 – Supervision**

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Mr. Provinsal serves as a Managing Partner and the Chief Compliance Officer of Paradigm. Mr. Provinsal can be reached at (908) 745-7400.

Paradigm has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paradigm. Further, Paradigm is subject to regulatory oversight by various agencies. These agencies require registration by Paradigm and its Supervised Persons. As a registered entity, Paradigm is subject to examinations by regulators, which may be announced or unannounced. Paradigm is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**David W. Chenet, CFA<sup>®</sup>  
VP of Investments**

**Effective: March 25, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of David W. Chenet (CRD# 5102910) in addition to the information contained in the Paradigm Wealth Advisory LLC (“Paradigm” or the “Advisor”) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradigm Disclosure Brochure or this Brochure Supplement, please contact us at (908) 745-7400.

Additional information about Mr. Chenet is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5102910.

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<http://paradigmwealthmanagement.com>



## Item 2 – Educational Background and Business Experience

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David W. Chenet, born in 1981, is dedicated to advising Clients of Paradigm in his role as the Vice President of Investments. Mr. Chenet earned a Bachelor of Arts International Studies from Bryant University in 2005. Mr. Chenet earned an MBA from San Diego State University in 2009. Additional information regarding Mr. Chenet's employment history is included below.

### Employment History:

VP of Investments, Paradigm Wealth Advisory LLC	04/2016 to Present
Registered Representative, LPL Financial LLC (Under the Business Name Paradigm Wealth Management LLC)	04/2016 to Present
Registered Representative, First Allied Securities, Inc.	02/2015 to 04/2016
Investment Advisor Representative, First Allied Securities, Inc.	09/2009 to 12/2014
Compliance Analyst, LPL Financial LLC	06/2006 to 08/2009

### Chartered Financial Analyst ("CFA®")

The Chartered Financial Analyst ("CFA") charter is a professional designation established in 1962 and awarded by CFA Institute. To earn the CFA charter, candidates must pass three sequential, six-hour examinations over two to four years. The three levels of the CFA Program test a wide range of investment topics, including ethical and professional standards, fixed-income analysis, alternative and derivative investments, and portfolio management and wealth planning. In addition, CFA charterholders must have at least four years of acceptable professional experience in the investment decision-making process and must commit to abide by, and annually reaffirm, their adherence to the CFA Institute Code of Ethics and Standards of Professional Conduct. CFA® is a trademark owned by CFA Institute.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Chenet.*** Mr. Chenet has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Chenet. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Chenet.*** However, we do encourage you to independently view the background of Mr. Chenet on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5102910.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Chenet is also a registered representative of LPL Financial LLC ("LPL Financial"). In his separate capacity as a registered representative, Mr. Chenet will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Chenet or the Advisor. Neither Paradigm nor Mr. Chenet will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative.

## Item 5 – Additional Compensation

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Mr. Chenet has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Chenet serves as the VP of Investments for Paradigm and is supervised by David Provinsal, the Chief Compliance Officer. Mr. Provinsal can be reached at (908) 745-7400.

Paradigm has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paradigm. Further, Paradigm is subject to regulatory oversight by various agencies. These agencies require registration by Paradigm and its Supervised Persons. As a registered entity, Paradigm is subject to examinations by regulators, which may be announced or unannounced. Paradigm is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

# **Form ADV Part 2B – Brochure Supplement**

**for**

**Andrew T. Koerner**  
**President - Sports and Entertainment Group**

**Effective: March 25, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Andrew T. Koerner (CRD# 2207442) in addition to the information contained in the Paradigm Wealth Advisory LLC ("Paradigm" or the "Advisor") Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradigm Disclosure Brochure or this Brochure Supplement, please contact us at (908) 745-7400.

Additional information about Mr. Koerner is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2207442.

## Item 2 – Educational Background and Business Experience

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Andrew T. Koerner, born in 1963, is dedicated to advising Clients of Paradigm in his role as the President of the Sports and Entertainment Group. Mr. Koerner earned a Bachelor of Arts degree from Rutgers University in 1987. Additional information regarding Mr. Koerner's employment history is included below.

### Employment History:

President - Sports and Entertainment Group, Paradigm Wealth Advisory LLC	04/2016 to Present
Registered Representative, LPL Financial LLC (Under the Business Name Paradigm Wealth Management LLC)	04/2016 to Present
Investment Advisor Representative, First Allied Advisory Services, Inc.	08/2005 to 04/2016
Registered Representative, First Allied Securities, Inc.	08/2005 to 04/2016
Financial Advisor, Citigroup Global Markets Inc.	02/1994 to 08/2005
Financial Advisor, Prudential Securities Incorporated	03/1992 to 02/1994

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Koerner.*** Mr. Koerner has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Koerner. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Koerner.*** However, we do encourage you to independently view the background of Mr. Koerner on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 2207442.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Koerner is also a registered representative of LPL Financial LLC ("LPL Financial"). In his separate capacity as a registered representative, he will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Koerner or the Advisor. Neither Paradigm nor Mr. Koerner will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Koerner is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Koerner's role with Paradigm. As an insurance professional, Mr. Koerner may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Koerner is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Koerner or the Advisor.

### Shaun O'Hara Foundation

Mr. Koerner serves as a board member of the Shaun O'Hara Foundation, a non-profit organization.

## **Item 5 – Additional Compensation**

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Mr. Koerner has additional business activities where compensation is received that are detailed in Item 4 - Other Business Activities above.

## **Item 6 – Supervision**

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Mr. Koerner serves as the President of the Sports and Entertainment Group of Paradigm and is supervised by David Provinsal, the Chief Compliance Officer. Mr. Provinsal can be reached at (908) 745-7400.

Paradigm has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paradigm. Further, Paradigm is subject to regulatory oversight by various agencies. These agencies require registration by Paradigm and its Supervised Persons. As a registered entity, Paradigm is subject to examinations by regulators, which may be announced or unannounced. Paradigm is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## **Form ADV Part 2B – Brochure Supplement**

**for**

**Deborah R. Walker  
Senior Vice President**

**Effective: March 25, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Deborah R. Walker (CRD# 833928) in addition to the information contained in the Paradigm Wealth Advisory LLC ("Paradigm" or the "Advisor") Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradigm Disclosure Brochure or this Brochure Supplement, please contact us at (908) 745-7400.

Additional information about Ms. Walker is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 833928.

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<http://paradigmwealthmanagement.com>



## Item 2 – Educational Background and Business Experience

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Deborah R. Walker, born in 1952, is dedicated to advising Clients of Paradigm in her role as a Senior Vice President. Ms. Walker earned a Bachelor of Arts degree from Macalester College in 1973. Additional information regarding Ms. Walker's employment history is included below.

### Employment History:

Senior Vice President, Paradigm Wealth Advisory LLC	04/2016 to Present
Registered Representative, LPL Financial LLC (Under the Business Name Paradigm Wealth Management LLC)	04/2016 to Present
Registered Representative, First Allied Securities, Inc.	08/2005 to 04/2016
Investor Advisor Representative, First Allied Advisory Services, Inc.	07/2012 to 04/2016
Managing Director, Koerner Walker Wealth Management	08/2005 to 11/2014
Financial Consultant, Citigroup Global Markets Inc.	01/1999 to 08/2005
Financial Consultant, Merrill Lynch, Pierce, Fenner & Smith Inc.	08/1991 to 01/1999
Financial Consultant, Manufacturers Hanover Securities Corporation	12/1986 to 08/1991

## Item 3 – Disciplinary Information

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Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. We encourage you to independently view the background of Ms. Walker on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 833928.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Ms. Walker is also a registered representative of LPL Financial LLC ("LPL Financial"). In her separate capacity as a registered representative, Ms. Walker will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Ms. Walker or the Advisor. Neither Paradigm nor Ms. Walker will earn ongoing investment advisory fees in connection with any services implemented in his separate capacity as a registered representative.

### Insurance Agency Affiliations

Ms. Walker is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Ms. Walker's role with Paradigm. As an insurance professional, Ms. Walker may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Ms. Walker or the Advisor.

### Seaverge Investments, LLC

Ms. Walker, in her own capacity, serves as a Partner at Seaverge Investments, LLC working on marketing and professional networking. This activity takes up about 20 hours of Ms. Walker's month.

## Item 5 – Additional Compensation

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Ms. Walker has additional business activities where compensation is received that are detailed in Item 4 above.

## **Item 6 – Supervision**

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Ms. Walker serves as a Senior Vice President with Paradigm and is supervised by David Provinsal, the Chief Compliance Officer. Mr. Provinsal can be reached at (908) 745-7400.

Paradigm has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paradigm. Further, Paradigm is subject to regulatory oversight by various agencies. These agencies require registration by Paradigm and its Supervised Persons. As a registered entity, Paradigm is subject to examinations by regulators, which may be announced or unannounced. Paradigm is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

## Privacy Policy

Effective Date: March 25, 2019

### Our Commitment to You

Paradigm Wealth Advisory LLC ("Paradigm" or the "Advisor") is committed to safeguarding the use of personal information of our Client's (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Paradigm (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Paradigm does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

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

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

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

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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#### Paradigm Wealth Advisory LLC

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Phone: (908) 745-7400 \* Fax: (908) 745-7404

<http://paradigmwealthmanagement.com>

### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, broker-dealers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Paradigm shares Client information with LPL Financial due to the oversight LPL Financial has over certain Supervised Persons of the Advisor. You may also contact us at any time for a copy of the LPL Financial Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Paradigm does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Paradigm or the Client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Paradigm does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (908) 745-7400.