



## *Wealth Partners*

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### **PART 2A OF FORM ADV: FIRM BROCHURE**

June 19, 2019

This Brochure provides information about the qualifications and business practices of Paladin Advisory Group, LLC, doing business as Paladin Wealth Partners. If you have any questions about the contents of this Brochure, please contact us at 515.348.6080. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Paladin Wealth Partners is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Paladin Wealth Partners is 285303.

Paladin Wealth Partners is a registered investment adviser. Registration with the United States Securities and Exchange Commission, any State Securities Authority, or the use of the term "Registered Investment Adviser" does not imply a certain level of skill or training. Clients are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise clients for more information on the qualifications of our firm and our employees.

## **Item 2 Summary of Material Changes**

There have been no material changes since the January 30, 2019 Form ADV filed on the IARD system.

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## **Item 4 Advisory Business**

### **The Firm**

Paladin Advisory Group, LLC, d/b/a Paladin Wealth Partners ("Paladin", "Paladin Wealth Partners", "PWP", or the "Firm" to be used synonymously herein) is an independent registered investment adviser based in Des Moines, Iowa. We are organized as a limited liability company under the laws of the State of Iowa. PWP was formed in 2016 by Bradley Clark, Debra Minkler, and Timothy Pratt who are our principal owners. Paladin is a fiduciary and is required to act in a client's best interest at all times.

### **Description of Services and Fees**

Paladin Wealth Partners provides comprehensive wealth management and investment advisory services that are customized and tailored to meet the needs of each client. We provide financial advice, counsel and management in the following key areas:

- Investment Management Services
- Financial Planning Services

The following paragraphs describe our services and fees. Please refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this Brochure, the words "we", "our" and "us" refer to Paladin Wealth Partners and the words "you", "your" and "client" refer to you as either a client or prospective client of our firm. Also, you may see the term Associated Person throughout this Brochure. As used in this Brochure, our Associated Persons are our firm's officers, employees, and all individuals providing investment advice on behalf of our firm.

### **Investment Management Services**

We offer discretionary and non-discretionary investment management services. Our investment advice is tailored to meet our clients' needs and investment objectives. If you retain our firm for investment management services, we will meet with you to determine your investment objectives, risk tolerance, and other relevant information (the "suitability information") at the beginning of our advisory relationship. We will use the suitability information we gather to develop a strategy that enables our firm to give you continuous and focused investment advice and/or to make investments on your behalf. Once we construct an investment portfolio for you, we will monitor your portfolio's performance on an ongoing basis, and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

If you participate in our discretionary investment management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow our firm to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by the investment advisory agreement you sign with our firm, a power of attorney, or trading authorization forms. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased for your account) by providing our firm with your restrictions and guidelines in writing. If you enter into non-discretionary arrangements with our firm, we must obtain your approval prior to executing any transactions on behalf of your account.

### **Financial Planning Services / Financial Consulting Services**

Our firm also offers financial planning and consulting services as a stand-alone service. These services typically involve a variety of advisory services regarding the management of the client's financial resources based upon an analysis of their individual needs. If you retain our firm for financial planning and consulting services, we will meet with you to gather information about your financial circumstances and objectives. As required, we will conduct follow-up interviews for the purpose of reviewing and/or collecting additional financial data. Once such information has been reviewed and analyzed, we will

provide you with our financial planning recommendations designed to help you achieve your stated financial goals and objectives.

Financial planning recommendations are based on your financial situation at the time we provide our recommendations, and on the financial information you provide to our firm. You have the right to accept or reject our financial planning recommendations, and you may choose any firm to assist you with implementing our recommendations.

In certain circumstances, we may also be engaged by High Net Worth individuals or entities (defined as clients that have at least \$1,000,000 under management with our firm or that have certified to our firm that they have a net worth of at least \$2,000,000) for financial consulting services. These are typically limited scope and/or project related and the fee for such services will be negotiated among the parties based on the scope of the work to be performed.

### **Types of Investments**

We primarily offer advice on mutual funds and exchange traded funds. Additionally, we may advise you on any type of investment that we deem appropriate based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship. You may request that we refrain from investing in particular securities or certain types of securities, and such requests must be in writing.

### **Assets Under Management**

As of December 31, 2018, we manage \$130,273,120 in client assets on a discretionary basis and \$3,039,939 in client assets on a non-discretionary basis for total assets under management of \$133,313,059.

## **Item 5 Fees and Compensation**

### **Investment Management Services**

Our annual fee for investment management services is billed quarterly in advance based on the asset value on the last trading day of the previous quarter. Our fee will be assessed pro rata in the event the investment management agreement is executed at any time other than the first day of a calendar quarter. Our current *maximum* annual investment management fee is 1.35% for discretionary and non-discretionary investment management services. The actual fee charged to a client is negotiable and influenced by the size and scope of the advisory relationship.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in you paying a reduced advisory fee based on our fee schedule stated above.

If the investment management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Our advisory fee is negotiable, depending on individual client circumstances.

The fees charged are calculated as described above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds, or any portion of the funds of an advisory client.

Unless we agree to invoice you directly, we will deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when the following requirements are met:

- You provide our firm with written authorization permitting the fees to be paid directly from your account held by the qualified custodian.
- We send you a fee statement showing the amount of the fee, the value of the assets on which the fee is based, and the specific manner in which the fee was calculated.
- The qualified custodian agrees to send you a statement, at least quarterly, indicating all amounts dispersed from your account including the amount of the advisory fee paid directly to our firm.

We encourage you to reconcile fee statements from us with the statement you receive from the qualified custodian. If you find any inconsistent information or have any questions, please call our main office number located on the cover page of this Brochure.

If our disclosure Brochure - Part 2 of the Form ADV - is not delivered to you within 48 hours prior to you entering into the investment management agreement, you may terminate the agreement within 5 business days of the date of acceptance without any penalty. Where you received the disclosure documents 48 hours in advance or if the 5 business day grace period has expired, either party may terminate the agreement upon 30-day written notice to the other party. The investment management fee will be pro-rated for the quarter in which the cancellation notice was given. Upon termination, any unearned fees will be refunded to you.

### **Financial Planning Services / Financial Consulting Services**

For financial planning services, we charge either a fixed fee ranging from \$500 to \$15,000 or a maximum hourly fee of \$300 per hour. Our financial planning fees are negotiable depending upon the complexity and scope of the plan, your financial situation, and your objectives.

Fees for financial consulting services (as described in Item 4) will be separately negotiated based on the scope of the engagement and services performed.

We typically require that you pay 50% of the fixed fee in advance and the remaining portion upon the completion of the services rendered. For our services charged on an hourly basis, we typically require payment upon completion of services rendered. We may, in our sole discretion, negotiate other fee paying arrangements with you. We will not require prepayment of a fee more than six months in advance and in excess of \$500.

If our disclosure Brochure - Part 2 of the Form ADV - is not delivered to you within 48 hours prior to you entering into the financial planning agreement, you may terminate the agreement within 5 business days of the date of acceptance without any penalty. Where you have received the disclosure documents 48 hours in advance or if the 5 business day grace period has expired, either party may terminate the agreement upon written notice to the other party. Upon termination of financial planning services, any prepaid but unearned fees will be refunded, and any earned but unpaid fees will be due and payable.

### **Additional Fees and Expenses**

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds and exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm, and others. For information on our brokerage practices, please refer to the "Brokerage Practices" section of this Brochure.

## **Compensation for the Sale of Securities or Other Investment Products**

Investment Adviser Representatives of our firm may also be separately licensed as independent insurance agents. If you purchase insurance-related products through these individuals, they may receive commission-based compensation in their separate capacity as insurance agents. The receipt of additional compensation may give these individuals a financial incentive to recommend insurance products. Clients are under no obligation, contractually or otherwise, to purchase insurance products through any person affiliated with our firm. In efforts to mitigate this conflict of interest, it is our firm's strict policy and fiduciary duty to act in our client's best interest.

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

We do not accept performance-based fees or participate in side-by-side management. Our fees are calculated as described in the *Fees and Compensation* section above, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

## **Item 7 Types of Clients**

We offer investment advisory services to individuals, pension and profit sharing plans, trusts, estates, charitable organizations, corporations, and other business entities.

In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your Account if it falls below a minimum size which, in our sole opinion, is too small to effectively manage.

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

### **Our Methods of Analysis and Investment Strategies**

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

- Charting Analysis - involves the gathering and processing of price and volume information for a particular security. This price and volume information is analyzed using mathematical equations. The resulting data is then applied to graphing charts, which is used to predict future price movements based on price patterns and trends.
- Fundamental Analysis - involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value.
- Technical Analysis - involves studying past price patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks.
- Long Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.
- Short Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial horizon, financial information, liquidity needs, and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio.

Modern Portfolio Theory - a theory of investment which attempts to maximize portfolio expected return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, by carefully diversifying the proportions of various assets.

Charting and Technical Analysis - The risk of market timing based on technical analysis is that charts

may not accurately predict future price movements. Current prices of securities may reflect all information known about the security and day to day changes in market prices of securities may follow random patterns and may not be predictable with any reliable degree of accuracy.

**Fundamental Analysis** - The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Moreover, as a result of revised IRS regulations, custodians and broker-dealers will begin reporting the cost basis of equities acquired in client accounts on or after January 1, 2011. Your custodian will default to the FIFO (First-In First-Out) accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, please provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Please note that decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

### **Risk of Loss**

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines. We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

### **Recommendation of Particular Types of Securities**

As disclosed under the "Advisory Business" section in this Brochure, our investment strategies primarily focus on mutual funds and exchange traded funds. We may also recommend other types of securities since each client may have different needs and/or risk tolerances. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely. However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with it. You should be advised of the following risks when investing in mutual funds and exchange traded funds:

Mutual funds and exchange traded funds are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. Exchange traded funds differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors



indefinitely which can dilute other investors' interests.

## **Item 9 Disciplinary Information**

Paladin Wealth Partners has been registered and providing investment advisory services since 2016. Neither our firm nor any of our Associated Persons has any reportable disciplinary information.

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

As discussed in Item 5 certain persons providing investment advice on behalf of our firm may also be licensed as independent insurance agents.

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

### **Description of Our Code of Ethics**

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. All of our Associated Persons are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Additionally, we maintain and enforce written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm. Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us at the telephone number on the cover page of this Brochure.

### **Participation or Interest in Client Transactions**

Neither our firm nor any of our Associated Persons has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this Brochure.

### **Personal Trading Practices**

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To mitigate this conflict of interest, it is our policy that neither our Associated Persons nor we shall have priority over your account in the purchase or sale of securities.

## **Item 12 Brokerage Practices**

Paladin participates in the institutional customer program offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Paladin receives some benefits from TD Ameritrade through its participation in the program.

When placing orders for more than one client account, the Paladin portfolio manager may decide to aggregate similar purchase or sale orders in the same security for several accounts resulting in an average price being applied to each client account participating in the aggregate order.

Paladin representatives will not generally exercise discretion to evaluate the commissions and services of other broker-dealers unless unusual conditions exist. Selection of one broker-dealer for executing orders may not allow Paladin to receive research from other broker-dealers in return for commission business, to batch transaction orders with those of other clients for volume commission discounts (unless batched with orders of other Paladin clients) or allow Paladin to evaluate the quality of execution services and commissions of other broker-dealers. Thus, selecting a single broker-dealer may not result in best price

or execution of a client's transactions.

As disclosed above, Paladin participates in TD Ameritrade's institutional customer program and Paladin may require clients to maintain accounts with TD Ameritrade for custody and brokerage services. There is no direct link between Paladin's participation in the program and the investment advice it gives to its clients, although Paladin receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk servicing advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to the Adviser by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Paladin's related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses) for Paladin's personnel to attend conferences or meetings generally relating to the program or to TD Ameritrade's advisor custody and brokerage services. Some of the products and services made available by TD Ameritrade through the program may benefit Paladin but may not benefit its client accounts. These products or services may assist Paladin in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Paladin manage and further develop its business enterprise. The benefits received by Paladin through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits by Paladin or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Paladin's recommendation of TD Ameritrade for custody and brokerage services.

### **Brokerage for Client Referrals**

Other than the services described above, we do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

### **Directed Brokerage**

We routinely recommend that you direct our firm to execute transactions through TD Ameritrade. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage transaction costs than you might otherwise pay through another broker-dealer/custodian that offers the same types of services. Not all advisers require their clients to direct brokerage.

### **Block Trades**

We may combine multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion regarding factual and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

## **Item 13 Review of Accounts**

The Investment Adviser Representative(s) assigned to your account will monitor your account on a periodic basis and will conduct account reviews at least quarterly to ensure the advisory services

provided to you and that the portfolio mix is consistent with your stated investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to: contributions and withdrawals; year-end tax planning; market moving events; security specific events; and/or, changes in your risk/return objectives.

For investment management accounts, statements are sent by the broker dealer or custodian that maintains custody of the client's account on at least a quarterly basis. We will also send clients a fee statement showing the amount of the fee, the value of the assets on which the fee is based, and the specific manner in which the fee was calculated. Financial planning clients may receive written financial plans, which are designed to achieve the client's stated financial goals and objectives.

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

Paladin Wealth Partners' primary source of revenues is from investment advisory fees (see Item 5 Fees and Compensation) where we act in a fiduciary capacity for clients. In limited circumstances, our firm's investment adviser representatives that are insurance licensed may receive commission-based compensation for activities performed in their separate capacity as insurance agents.

Please refer to Item 12 *Brokerage Practices* for disclosures on research and other benefits we may receive resulting from our relationship with your account custodian.

We do not receive any compensation from any third party in connection with providing investment advice to you nor do we compensate any individual or firm for client referrals.

As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by our firm from a non-client in and of itself creates a potential conflict of interest and may influence our choice in providing services to your account. It is PWP's policy to avoid conflicts of interest in general, and if they do occur to ensure that they are clearly disclosed to clients so that they can make their own determination of what is in their best interest.

As disclosed under Item 12, above, Paladin participates in TD Ameritrade's institutional customer program and Paladin may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between Paladin's participation in the program and the investment advice it gives to its Clients, although Paladin receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Paladin participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Adviser by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Paladin's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Paladin but may not benefit its Client accounts. These products or services may assist Paladin in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Paladin manage and further develop its business enterprise. The benefits received by Paladin or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Adviser endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Paladin or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Paladin's choice of TD Ameritrade for custody and brokerage services.

Paladin also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment Advisors participating in the program. Specifically, the Additional Services include Envestnet Tamarac for portfolio management software and Y-Charts for data, research, and analytics. TD Ameritrade provides the Additional Services to Paladin in its sole discretion and at its own expense, and Paladin does not pay any fees to TD Ameritrade for the Additional Services. Paladin and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.

Paladin's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Paladin, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Paladin's Client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Paladin, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Paladin may have an incentive to recommend to its Clients that the assets under management by Paladin be held in custody with TD Ameritrade and to place transactions for Client accounts with TD Ameritrade. Paladin's receipt of Additional Services does not diminish its duty to act in the best interests of its Clients, including to seek best execution of trades for Client accounts.

## **Item 15 Custody**

We do not have physical custody of any of your funds or securities. Your funds and securities will be held with a bank, broker-dealer, or other independent, qualified custodian. You will receive account statements from the independent qualified custodian(s) holding your funds and securities at least quarterly.

If authorized and instructed by you, the custodian will directly debit your account(s) for the payment of our advisory fees. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. You should carefully review account statements for accuracy. If you have a question regarding your account statement, or if you did not receive a statement from your custodian, please contact us directly at the telephone number on the cover page of this Brochure.

Our clients may have standing letters of authorization on their accounts that, by definition, may constitute custody of client accounts. We have reviewed those arrangements and determined that they meet the IAA no action letter seven conditions and do not trigger the surprise custody audit.

## **Item 16 Investment Discretion**

Before we can buy or sell securities on your behalf, you must first sign our discretionary management agreement and/or trading authorization forms. You may grant our firm discretion over the selection and amount of securities to be purchased or sold for your account(s) without obtaining your consent or approval prior to each transaction. You may specify investment objectives, guidelines, and/or impose certain conditions or investment parameters for your account(s). For example, you may specify that the investment in any particular stock or industry should not exceed specified percentages of the value of the portfolio and/or restrictions or prohibitions of transactions in the securities of a specific industry or security. Please refer to the "Advisory Business" section in this Brochure for more information on our discretionary management services.

If you enter into non-discretionary arrangements with our firm, we will obtain your approval prior to the execution of any transactions for your account(s). You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

## **Item 17 Voting Client Securities**

### **Proxy Voting**

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitation to vote proxies.

## **Item 18 Financial Information**

We are not required to provide financial information to our clients because we do not: require the prepayment of more than \$500 in fees and six or more months in advance; or take custody of client funds or securities; or have a financial condition that is reasonably likely to impair our ability to meet our commitments to you.

## **Item 19 Additional Information**

### **Trade Errors**

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

### **Class Action Lawsuits**

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

### **Your Privacy**

We view protecting your private information as a top priority. Pursuant to applicable privacy requirements, we have instituted policies and procedures to ensure that we keep your personal information private and secure.

We do not disclose any non-public personal information about you to any non-affiliated third parties, except as permitted by law. In the course of servicing your account, we may share some information with our service providers, such as transfer agents, custodians, broker-dealers, accountants, consultants, and attorneys.

We restrict internal access to non-public personal information about you to employees, who need that information in order to provide products or services to you. We maintain physical and procedural safeguards that comply with regulatory standards to guard your non-public personal information and to ensure our integrity and confidentiality. We will not sell information about you or your accounts to anyone. We do not share your information unless it is required to process a transaction, at your request, or required by law.

You will receive a copy of our privacy notice prior to or at the time you sign an advisory agreement with our firm. Thereafter, we will deliver a copy of the current privacy policy notice to you on an annual basis. Please contact our main office at the telephone number on the cover page of this Brochure if you have any questions regarding this policy.



***Wealth Partners***

**Bradley W. Clark, CFA**

**CRD# 4983613**

**Paladin Wealth Partners**  
1337 University Avenue, Suite 300  
Clive, IA 50325

**Telephone: 515-348-6080**

**June 19, 2019**

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Bradley W. Clark that supplements the Paladin Wealth Partners brochure. You should have received a copy of that brochure. Please contact us at 515-348-6080 if you did not receive Paladin Wealth Partners' brochure or if you have any questions about the contents of this supplement.

Additional information about Bradley W. Clark is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 Educational Background and Business Experience

*The business background information provided below is for the last five years.*

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Advisor: Bradley W. Clark

Year of Birth: 1973

### Education

- University of Northern Iowa, BA (Accounting) - May 1996
- Kellstadt Graduate School of Business, DePaul University, MBA (Finance) - Dec 2005

### Business Background:

- Paladin Wealth Partners, President/CIO/CCO, 10/2016 – Present
- Paladin Wealth Partners, Investment Adviser Representative, 10/2016 – Present
- HJN Advisors, LLP, President/CIO, 12/2014 – 12/2016
- HJN Advisors, LLP, Investment Adviser Representative, 09/2014 – 12/2016
- US Bank, Sr. Portfolio Manager, 04/2012 - 08/2014
- Capstone Investments, Investment Banking, 02/2011 - 03/2012
- Consulting, 04/2010 - 02/2011
- Aviva Investors, Portfolio Manager, 09/2005 - 12/2009

Certifications: CFA Charterholder 2008

Mr. Clark is a holder of the right to use the Chartered Financial Analyst® designation. To earn the CFA charter and designation, a candidate must have a four-year bachelor's degree and four years of professional experience involving investment decision-making or four years of qualified investment work experience; must become a member of CFA Institute (the global association of investment professionals that administers the CFA charter); pledge to adhere to the CFA Institute Code of Ethics and Standards of Professional Conduct on an annual basis; must apply for membership to a local CFA member society; and must complete the CFA Program. The CFA Program is a globally recognized, graduate level curriculum that provides a strong foundation of the real-world investment analysis and portfolio management skills and practical knowledge for today's investment industry. It also emphasizes the highest ethical and professional standards. The CFA Program is organized into three levels, each culminating in a six-hour exam. CFA Program candidates report in excess of 300 hours of study per level. Completing the entire Program takes most candidates between two and five years. For more information regarding the CFA charter, visit their website at [www.cfainstitute.org/cfaprogram](http://www.cfainstitute.org/cfaprogram).

## Item 3 Disciplinary Information

Mr. Clark does not have any disciplinary disclosure.

## Item 4 Other Business Activities

N/A

## Item 5 Additional Compensation

Mr. Clark does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

## Item 6 Supervision

Mr. Clark, Chief Compliance Officer of Paladin Wealth Partners, LLC is responsible for supervising the activities of our firm and our Associated Persons. He can be reached at 515.348.6083.



**Debra Minkler**

**CRD#6391658**

**Paladin Wealth Partners**  
1337 University Avenue, Suite 300  
Clive, IA 50325

**Telephone: 515-348-6080**

**June 19, 2019**

**FORM ADV PART 2B  
BROCHURE SUPPLEMENT**

This brochure supplement provides information about Debra Minkler that supplements the Paladin Wealth Partners brochure. You should have received a copy of that brochure. Please contact us at 515-348-6080 if you did not receive Paladin Wealth Partners' brochure or if you have any questions about the contents of this supplement.

Additional information about Debra Minkler is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



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

The business background information provided below is for the last five years.

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Your Financial Adviser: Debra J. Minkler

Year of Birth: 1959

Education:

- University of Memphis, JD with highest honors, 1990
- Central College, BA Magna Cum Laude, Business Administration, 1981
- Series 65 Exam (10/2014)

Business Background:

- Paladin Wealth Partners, LLC, Investment Adviser Representative, 10/2016 – Present
- HJN Advisors, LLP, Investment Adviser Representative, 10/2014 – 12/2016
- US Bank National Association, Relationship Manager, 05/1995 - 08/2014

## **Item 3 Disciplinary Information**

Debra Minkler does not have any disciplinary disclosure.

## **Item 4 Other Business Activities**

N/A

## **Item 5 Additional Compensation**

Mrs. Minkler does not receive any commissions, bonuses or other compensation based on the sale of securities or other investment products.

## **Item 6 Supervision**

Mr. Clark, Chief Compliance Officer of Paladin Wealth Partners, LLC is responsible for supervising the activities of our firm and our Associated Persons. He can be reached at 515.348.6083.



***Wealth Partners***

**Timothy Pratt CFP®**

**CRD#1623355**

**Paladin Wealth Partners**  
1337 University Avenue, Suite 300  
Clive, IA 50325

**Telephone: 515-348-6080**

**June 19, 2019**

**FORM ADV PART 2B BROCHURE  
SUPPLEMENT**

This brochure supplement provides information about Timothy Pratt that supplements the Paladin Wealth Partners brochure. You should have received a copy of that brochure. Please contact us at 515-348-6080 if you did not receive Paladin Wealth Partners' brochure or if you have any questions about the contents of this supplement.

Additional information about Timothy Pratt is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

The business background information provided below is for the last five years.

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Financial Adviser: Timothy E. Pratt, CFP®

Year of Birth: 1955

### Education:

- Northeast Missouri State University, Kirksville, MO; M.A., 1982
- University of Northern Iowa, Cedar Falls, IA; B.A., 1977
- Grand View University, Des Moines, IA; A.A., 1975

### Business Background:

- Paladin Wealth Partners, LLC, Investment Adviser Representative, 10/2016 – Present
- HJN Advisors, LLP, Investment Adviser Representative, 10/2010 – 12/2016
  - *Registered as a Registered Representative of Ausdal Financial Partners, Inc. (5/2012-12/2014)*
  - *Registered as a Registered Representative of First Allied Securities, Inc. (9/2010-5/2012)*
- RSM McGladrey Wealth Management LLC, 9/2005 – 09/2010
  - *Registered as a Registered Representative of Birchtree Financial Services, Inc. (9/2005-9/2012)*

### Certifications: Certified Financial Planner (CFP®) 1990

Mr. Pratt has earned the right to use the CFP® designation by the Certified Financial Planner Board of Standards, Inc. CFP® professionals are held to strict ethical standards to ensure financial planning recommendations are in clients' best interest and require CFP® professionals to put their clients' interests ahead of their own at all times. To earn the designation, the CFP® candidate must have a bachelor's degree (or higher) from an accredited college or university and three years of full-time personal financial planning experience. In addition, candidates must take the CFP Certification examination and complete a CFP-board registered program or hold an accepted designation, degree or license. Every two years, CFP® professionals must complete a minimum of 30 hours of continuing education. More information regarding the CFP can be found at [www.cfp.net](http://www.cfp.net).

## Item 3 Disciplinary Information

Mr. Pratt does not have any reportable disciplinary disclosure.

## Item 4 Other Business Activities

Mr. Pratt is separately licensed as an independent insurance agent. In this capacity, he may recommend transactions in insurance products that are suitable for clients based on their individual situation and circumstances. If you purchase these products through him, he may receive additional commissions customary with the sale of these products which are separate and distinct from the advisory fee paid to Paladin Wealth Partners. Please see Part 2A Item 10 of our firm's ADV Brochure for more information on this outside business activity and its related conflicts of interest.

## Item 5 Additional Compensation

As stated in Item 4 of this Supplement and the *Fees and Compensation* section of Paladin Wealth Partners' firm brochure, Mr. Pratt may receive additional compensation as a result of his separate activities as a licensed insurance agent.

## Item 6 Supervision

Mr. Clark, Chief Compliance Officer of Paladin Wealth Partners, LLC is responsible for supervising the activities of our firm and our Associated Persons. He can be reached at 515.348.6083.



***Wealth Partners***

**Adam C. Bormann**

**CRD#4476079**

**Paladin Wealth Partners**  
1337 University Avenue, Suite 300  
Clive, IA 50325

**Telephone: 515-348-6080**

**June 19, 2019**

**FORM ADV PART 2B BROCHURE  
SUPPLEMENT**

This brochure supplement provides information about Adam Bormann that supplements the Paladin Wealth Partners brochure. You should have received a copy of that brochure. Please contact us at 515-348-6080 if you did not receive Paladin Wealth Partners' brochure or if you have any questions about the contents of this supplement.

Additional information about Adam Bormann is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 Educational Background and Business Experience

The business background information provided below is for the last five years.

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Financial Adviser: Adam C. Bormann

Year of Birth: 1978

### Education:

- Iowa State University, Ames, IA; Finance, M.B.A., 2002
- University of Northern Iowa, Cedar Falls, IA; Finance, B.A., 2000
- Marshalltown Community College, Marshalltown, IA; Business, A.A., 1998
- Series 65 Exam (10/2006)

### Business Background:

- Paladin Wealth Partners, LLC, Investment Adviser Representative, 06/2017 – Present
- TrailRunner International, Head of Operations, 12/2016 – 5/2017
  - *Mountain Lion Aviation, Head of Operations (12/2016 – 5/2017)*
- HJN Advisors, LLP, Investment Adviser Representative, 04/2014 - 12/2016
  - *Registered as a Registered Representative of Ausdal Financial Partners, Inc. (4/2014-12/2006)*
- U.S. Bancorp Investments, Inc., Investment Adviser Representative/Registered Representative, 3/2011 - 04/2014
- Wells Fargo Investments, LLC, Investment Adviser Representative/Registered Representative, 5/2008 - 3/2011

## Item 3 Disciplinary Information

Mr. Bormann does not have any reportable disciplinary disclosure.

## Item 4 Other Business Activities

Mr. Bormann is separately licensed as an independent insurance agent. In this capacity, he may recommend transactions in insurance products that are suitable for clients based on their individual situation and circumstances. If you purchase these products through him, he may receive additional commissions customary with the sale of these products which are separate and distinct from the advisory fee paid to Paladin Wealth Partners. Please see Part 2A Item 10 of our firm's ADV Brochure for more information on this outside business activity and its related conflicts of interest.

## Item 5 Additional Compensation

As stated in Item 4 of this Supplement and the *Fees and Compensation* section of Paladin Wealth Partners' firm brochure, Mr. Bormann may receive additional compensation as a result of his separate activities as a licensed insurance agent.

## Item 6 Supervision

Mr. Clark, Chief Compliance Officer of Paladin Wealth Partners, LLC is responsible for supervising the activities of our firm and our Associated Persons. He can be reached at 515.348.6083.