

# Paragon Capital Management, Ltd.

## Client Relationship Summary (Form CRS) | March 11, 2024

### INTRODUCTION:

Paragon Capital Management, Ltd. is registered with the Securities and Exchange Commission (SEC) as an investment adviser. An investment adviser's services and fees differ from a broker's, and it is important for you, a retail investor, to understand the differences. You can access educational materials and research broker-dealers, investment advisers, and investing with the free and straightforward tools at [www.investor.gov/CRS](http://www.investor.gov/CRS).

### RELATIONSHIPS AND SERVICES:

#### What investment services and advice can you provide me?

We offer financial planning and investment management services. Our financial planning covers retirement, estates and trusts, income tax, employee benefits, insurance, education, and other areas. We initially meet with you to go over your goals and objectives, current assets, income and expenses, and to understand your comfort with different levels of risk. Then, we develop a financial plan and an investment policy that is the basis for the portfolio we construct to meet your goals and objectives. We regularly monitor your investments and communicate with you, reporting to you quarterly and rebalancing your portfolio as necessary based on your investment policy and capital market conditions.

Client accounts are typically managed on a discretionary basis, which means you give Paragon the authority to buy and sell securities on your behalf. We invest in individual stocks and bonds as well as mutual funds and exchange traded funds. We also may invest in hedge funds and investment partnerships that pursue various investment strategies. The amounts and types of investments we make in your accounts are outlined and constrained by your investment policy statement.

For a more complete picture of our services, our ADV disclosure brochure, ADV Part 2A, is available on our website ([www.paragoncapitalco.com](http://www.paragoncapitalco.com)).

### QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

### FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT:

#### What fees will I pay?

We charge based on the value of your investment portfolio. Fees start at 0.9% of the first \$1 million of value, then drop to 0.7% for the next \$4 million, then to 0.5% for the next \$5 million, and then to 0.35% for all assets above \$10 million. Our minimum annual fee is \$7,000. More information is available on page 7 of our ADV part 2A. Fees are negotiable. You may pay additional fees in connection with investments that we make. Individual stocks have no added costs. Mutual funds and ETFs charge fees, and some mutual funds are subject to transaction costs. You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and cost you are paying.

You may find more detailed information about fees and costs in our brochure, specifically on page 7 of our Form ADV Disclosure Brochure Part 2A, available on our website ([www.paragoncapitalco.com](http://www.paragoncapitalco.com)).

### QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- Help me understand how these fees and costs might affect my investments.
- If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

### **What are your legal obligations to me when acting as my financial adviser? How else does your firm make money, and what conflicts of interest do you have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. Our revenue comes exclusively from advisory fees. We do not receive commissions, 3<sup>rd</sup> party payments, revenue sharing, or any additional compensation from the investments we recommend.*

You may find more detailed information about our conflicts of interest and how we manage them in our brochure, specifically on page 7, 12, 13, and 14 of our Form ADV Part 2A, available on our website ([www.paragoncapitalco.com](http://www.paragoncapitalco.com)).

### QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- How might your conflicts of interest affect me, and how will you address them?

### **How do your financial professionals make money?**

Our financial professionals are paid a salary and bonus. Their compensation is related to their contributions to Paragon and client service.

### DISCIPLINARY HISTORY:

### **Do you or your financial professionals have a legal or disciplinary history?**

No, Paragon and our financial professionals do not have any legal or disciplinary history. You can visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research Paragon and our financial professionals.

### QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- As a financial professional, do you have any disciplinary history? For what type of conduct?

### **Additional Information**

You can find information about our firm on our website, [www.paragoncapitalco.com](http://www.paragoncapitalco.com), and in our firm [brochure](#). In addition, the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching CRD #105147. You may also contact our firm at (303)-293-3680 to request a copy of this relationship summary and other up-to-date information.

### QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:

- Who is my primary contact person?
- Is he or she an investment advisor or representative of a broker-dealer?
- Who can I talk to if I have concerns about how this person is treating me?