

Form ADV Part 2A

PARADIGM CONSULTING INC.

CRD #144990

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Paradigm Consulting, Inc. is pending registration as a New York State Registered Investment Adviser.
This registration does not imply any level of skill or training.

March 25, 2024

This disclosure brochure (Form ADV Part 2A) provides information about the qualifications and business practices of Paradigm Consulting, Inc. If you have any questions about the contents of this brochure, please contact us at (315) 797-8400. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Paradigm Consulting, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Material Changes

Our Brochure was last updated on December 31, 2022. This section will note any material changes that may have been made since our last printed Brochure. Please note the following changes that have occurred:

- The Firm is no longer an SEC Registered Investment Adviser and has applied for New York State Investment Adviser Registration.
- The Firm no longer provides advisory services to retail clients
- The Firm no longer provides discretionary advisory services
- The Firm no longer provides Third-Party Advisory Services
- The Firm no longer provides the Vision 2020 Programs to include:
 - Wealth Management Platform Program
 - Advisor Managed Portfolio Program
 - Genesis Model Portfolio Program
 - SMA and UMA Programs

We will further provide you with a new Brochure or a Summary of Material Changes, free of charge, as necessary.

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Item 4: Advisory Business

Paradigm Consulting, Inc. (“we”, “our”, “us”, “Firm”), has applied to be an Independent Registered Investment Adviser with the State of New York. Our business focuses on pension consulting services. Laurie A. Schoen and Amy L. Mielnicki are the principal owners of Paradigm Consulting, Inc.

We are pending registration as an Investment Adviser with the State of New York, CRD #144990, in order to offer investment advisory products and services to our advisory clients (“you”). Such services are offered through our Financial Advisers (“FAs”) who have registered as our Investment Adviser Representatives (“Advisory Representatives”). The registration of our firm and its advisers does not imply a certain level of skill or training.

Separate and apart from their registration as Advisory Representatives of the Adviser, the Advisory Representatives are also Registered Representatives of **Osaic Wealth, Inc.**, a Financial Industry Regulatory Authority (“FINRA”) broker/dealer and a SEC registered investment adviser. Such registration of the Registered Representatives or **Osaic Wealth, Inc.** does not imply a certain level of skill or training. **Osaic Wealth, Inc.** is also a member of various other regulatory bodies. **Osaic Wealth, Inc.** does not provide any investment advisory services in conjunction with or as part of the investment advisory services provided by Paradigm Consulting, Inc. or its Advisory Representatives.

Types of Advisory Programs We Offer

RETIREMENT PLAN CONSULTING SERVICES

We also offer retirement consulting services to employee benefit plans and their fiduciaries. The services are designed to assist the plan sponsor (hereafter the “Company”) in meeting their management and fiduciary obligations to the plan under ERISA. Retirement consulting services will consist of general or specific advice, and may include any one or all of the following:

1. **Strategic Planning and Investment Policy Development/Review.** Meet with the Company and/or the Named Fiduciary or their fiduciary delegate to assist them in developing an investment policy statement (hereafter the “IPS”). Alternatively, if the Plan has an existing investment policy statement, we will review the existing IPS and assist the Company, Named Fiduciary and/or their fiduciary delegate to determine whether the Plan is performing consistent with the IPS and/or whether the IPS needs to be revised, based on an analysis of the Plan’s liquidity requirements, performance goals and risk tolerance levels of the Plan using information provided by the Company.
2. **Plan Review.** Conduct a review of the Plan design and advise the Named Fiduciary whether the Plan is operating in accordance with Plan documents and applicable provisions of ERISA; and review Named Fiduciary’s compliance with fiduciary responsibilities, including compliance with requirements for self-directed plans (if applicable) under ERISA Section 404(c);
3. **Plan Fee and Cost Review.** Conduct an annual review fees and costs charged to Plan by other service providers to assist Named Fiduciary to determine reasonableness of fees and costs paid by Plan;
4. **Third-Party Service Provider Liaison.** Act as liaison for the Plan and the Named Fiduciary when dealing with the trustee, custodian, plan actuary and other third-party service providers to Plan;
5. **Assessment of Investments.** Conduct a periodic review of fund expenses, investment performance, and style drift for mutual funds offered by the Plan to participants, comparing them with other funds in the same asset category using Morningstar data from Principia and MPI Stylus; provide suggestions

to the Named Fiduciary from time to time as deemed warranted by the IAR for alternative mutual fund options for the Plan to make available to its participants (which decision shall remain the sole and exclusive decision of the Named Fiduciary and/or their fiduciary delegate);

6. **Participant Education and Communication.** Coordinate and/or conduct investment education and enrollment meetings for plan participants as determined by the Company.

In certain circumstances, the Company may also engage us to provide the following additional services, for separate compensation:

1. **Executive Benefits.** Review, design and implementation for nonqualified plans/deferred compensation.
2. **Plan Conversion.** Assist with conversion to alternate vendors, including preparation of Request for Proposal (RFP) from prospective new vendors, and review and comparison of responses to RFP.
3. **Merger and Acquisition Assistance.** Perform merger and acquisition due diligence review of pension plan documents and investments for possible merger or termination of duplicate plans.
4. **Compliance Correction.** Assist with corrective actions as necessary to comply with applicable laws and regulations.
5. **Coordination with Other Advisers.** Interact with outside advisors, or tax, legal and accounting counsel, as necessary.

We will determine with the Company, in advance, the scope of services to be performed and the fees for all requested services. Prior to engaging us to provide pension consulting services, the Company will be required to enter into a written agreement with us setting forth the terms and conditions of the engagement, describing the scope of the services to be provided, and the relevant fees and fee paying arrangements. In performing the contracted services, we shall not be required to verify the accuracy or consistency of any information received from the Company.

The fee for the services may be charged either at a pre-determined fixed fee or based upon a percentage of the Plan assets. On-site participant educational sessions are also available and are charged at a per day rate as requested by the Company. The exact fee will be negotiated in advance of services rendered and shall be clearly set forth in the executed agreement for services between us and the Company. Fees may be billed quarterly or monthly (*in arrears or in advance*). In special circumstances other fee paying arrangements may be negotiated. The above referenced terms will be disclosed in the client agreement we sign with the Company. In special circumstances other fee-paying arrangements may be negotiated. There is no minimum account size requirement for our Retirement Plan Consulting Services.

All client accounts are regulated under the Employee Retirement Income Securities Act ("ERISA"). We will provide pension consulting services to the Company as described above. In providing pension consulting services, we and the Company agree that we will serve in a fiduciary capacity with respect to certain of the services provided, and as referenced in the executed agreement for services. However, the Company is free to seek independent advice about the appropriateness of any recommendations made by us, or our IARs.

We do not provide legal, tax, or actuarial advice and we will not be responsible for ensuring that the IPS and asset allocation choices comply with any legal, actuarial or other requirements that apply to the Plan.

We will serve in a **Non-Discretionary** ERISA fiduciary capacity with respect to the services that we provide, which will be further explained in the written agreement we sign with the Company. A **Non-Discretionary** investment advisory account is an account where buy and sell decisions are made by the client. This means that the you must direct all transactions to be completed on an account. We do not have the ability to complete transactions without first getting permission from the you. The Company is always free to seek independent advice about the appropriateness of any recommendations made by us.

Management of Client Assets

Paradigm Consulting, Inc.'s investment advisory accounts are managed on a non-discretionary basis, determined at the time the account is opened based on our client's written authorization. February 29, 2024 Paradigm Consulting, Inc. had the following client assets under management (AUM):

- \$5,900,000 AUM for non-discretionary accounts

Item 5: Fees and Compensation

RETIREMENT PLAN CONSULTING SERVICES

We offer our Retirement Plan Consulting Services as a fixed fee or a fee based upon a percentage of the Plan assets that is billed to the plan sponsor (the "Company"). The exact fee is negotiated in advance of services rendered and is disclosed in the executed written agreement that we sign with the Company. Fees may be billed quarterly or monthly (***in arrears or in advance***). In special circumstances other fee paying arrangements may be negotiated. The above referenced terms will be disclosed in the client agreement we sign with the Company.

The written agreement may be terminated by us or the Company at any time upon 60 days' prior written notice. Upon termination, we will deliver a final billing statement for unbilled work performed prior to termination, and the Company will have a period of 30 days within which to deliver payment.

Our Retirement Plan Consulting Services fee schedule is as follows:

- ***Fixed Fee:***
Based on the scope of services agreed upon in engagement agreement, reasonable in light of geographical location, complexity of engagement, size of Plan, and other relevant factors:

Range: \$1,000 - \$100,000

- ***Percentage of Plan Assets:***
Based on specific asset levels in Plan at dates provided in the engagement agreement.

Range:	\$0 - \$20,000,000	0.10 - 1.00% of Plan Assets
	\$20,000,001 - \$40,000,000	0.05 - 0.50% of Plan Assets
	\$40,000,001 and above	0.03 - 0.25% of Plan Assets

- ***On-site Participant Education:***
Based on the scope of services requested by the company and the length of time needed, On-site Participant Education is available. The rates for On-site Participant Educational services, which are above and beyond the Fixed Fee or Percentage of Plan Asset consulting fees, include:

Full Day: \$1,500

All Retirement Plan Consulting Services fees are payable either monthly or quarterly (*in advance or arrears*) as invoiced. On-site Participant Education fees are payable monthly in arrears. In special circumstances, other fee paying arrangements may be negotiated.

Negotiation of Fees:

Fees are negotiated on a case-by-case basis, depending on a variety of factors, including the nature and complexity of the particular service, your relationship with us, the size of the account, the potential for other business or clients, the amount of work anticipated and the attention needed to manage your account. As a result of these and other factors, the sponsors of the advisory programs offered also set different limits on fees that we may charge you. Please note that the same or similar services to those described above may be available elsewhere to you at a lower cost.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide advisory services to pension, retirement and profit sharing plans.

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

Methods of Analysis:

When analyzing investments that may be right for you, we use a methodology that utilizes both quantitative and qualitative factors in evaluating investment managers and their strategies, to arrive at a score for the investment. This scoring system is built around pass/fail criteria, on a scale of 0 to 10 (with 10 being the best).

Ninety percent of the investment's score is quantitative, incorporating modern portfolio theory statistics, risk and return factors, style attribution analysis and peer group rankings. The remaining ten percent of the score is qualitative, taking into account the average tenure of the investment management team. Other criteria that may be considered include the viability of the firm managing the assets, management or personnel issues, regulatory issues and/or whether there has been a change in direction of the stated investment strategy.

Combined, these factors represent our way of measuring the relative performance, characteristics, behavior and overall appropriateness of an investment for inclusion in your portfolio. General investment guidelines are illustrated below:

- | | |
|--------------|---------------|
| • Good | 9 – 10 Points |
| • Acceptable | 7 – 8 Points |
| • Watch List | 5 – 6 Points |
| • Poor | 0 – 4 Points |

An investment scoring a 7 or better may be selected for your portfolio. Investments are reviewed quarterly. If an investment scores a 5 or 6, it is placed on a watch list. If an investment remains on the watch list for two consecutive quarters, it is removed from your portfolio and replaced with another investment scoring at

least a 7. Investments which score 4 or lower are evaluated for immediate removal and replacement in your portfolio.

Investment Strategies:

Subject to suitability requirements, we generally advise the long-term purchase of securities to our clients. Long-term purchases are typically defined as the purchase of securities held for at least a year. However, we do utilize a tactical approach to asset allocation, which means we may overweight a certain asset class at any given time, if we feel it is undervalued relative to others. This may cause us to utilize short-term purchases, in which securities are held for less than one year.

Methods of Analysis Risks:

When using quantitative and qualitative analysis, we generally rely on, among other things, database subscriptions for the statistics utilized in our methodology. Data we review is generally considered reliable, but we cannot guarantee, nor have we verified its accuracy. In addition, the data that we review is sometimes subjective in nature and open to interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in quantitative and qualitative analysis.

Investment Strategy Risks:

Long-term purchases – Using a long-term purchase strategy generally assumes the Financial Markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term may create an opportunity cost - “locking-up” assets that may be better utilized in the short-term in other investments.

Short-term purchases – Using a short-term purchase strategy generally assumes that we can predict how Financial Markets will perform in the short-term which may be very difficult. There are many factors that can affect Financial Market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Security Type Risks:

Mutual Funds

Investing in mutual funds involves the assumption of risk including:

- Manager Risk: which is the risk that an actively managed mutual fund’s investment adviser will fail to execute the fund’s stated investment strategy.
- Market Risk: which is the risk that the Stock Market will decline, decreasing the value of the securities contained within the mutual funds we recommend to you.
- Industry Risk: which is the risk that a group of stocks in a single industry will decline in price due to adverse developments in that industry, decreasing the value of mutual funds that are significantly invested in that industry.
- Inflation Risk: which is the risk that the rate of price increases in the economy deteriorates the returns associated with the mutual fund.

Associated Risks:

When using quantitative and qualitative analysis, we generally rely on, among other things, database subscriptions for the statistics utilized in our methodology. Data we review is generally considered reliable, but we cannot guarantee, nor have we verified its accuracy. In addition, the data that we review is sometimes subjective in nature and open to interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in quantitative and qualitative analysis.

When pursuing our long-term purchase strategy, we assume the Financial Markets will go up in the long-term which may not be the case. There is also the risk that the segment of the market that you are invested in or perhaps just your particular investment will go down over time even if the overall Financial Markets advance. Purchasing investments long-term may create an opportunity cost - “locking-up” assets that may be better utilized in the short-term in other investments.

Investing in securities involves risk of loss that you should be prepared to bear.

Item 9: Disciplinary Information

There are no material disciplinary events to report.

Item 10: Other Financial Industry Activities and Affiliations

All representatives of our firm that provide advice to you (“Advisory Representatives”) are associated with **Osaic Wealth, Inc.** as Registered Representatives. **Osaic Wealth, Inc.** is a diversified financial services company registered with the Financial Industry Regulatory Authority (“FINRA”) as a broker-dealer engaged in the offer and sale of securities products. Our Advisory Representatives may recommend the purchase of securities offered by **Osaic Wealth, Inc.** If you purchase these products through them, they will receive normal commissions which may be in addition to customary advisory fees. As such, Advisory Representatives may have an incentive to sell you commissionable products in addition to providing you with advisory services.

In addition, some members of Paradigm Consulting, Inc. are affiliated with **Osaic Wealth, Inc.’s** Investment Adviser. Please be aware that you are under no obligation to purchase products or services recommended by us or members of our Firm in connection with providing you with any advisory service that we offer.

Our advisory representatives are also licensed as insurance agents. We may, from time to time, recommend to clients insurance products, including variable annuities, fixed annuities, and other life and health insurance products. Such recommendations may be considered to create a conflict of interest because they may result in an increase in compensation to us. Please be aware that you are under no obligation to purchase any insurance products or services recommended by us or members of our Firm.

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

We have adopted a Code of Ethics (the “Code”) pursuant to Rule 204A-1 of the Advisers Act to address securities-related conduct. The Code focuses primarily on fiduciary duty, personal securities transactions, insider trading, gifts, and conflicts of interest. The Code includes our policies and procedures developed to protect your interests in relation to the following topics:

- The duty at all times to place your interests first;
- The requirement that all personal securities transactions be conducted in such a manner as to be consistent with the Code and to avoid any actual or potential conflict of interest or any abuse of an employee’s position of trust and responsibility;
- The fiduciary principle that information concerning the identity of your security holdings and financial circumstances are confidential; and

- The principle that independence in the investment decision-making process is paramount.

We will provide a copy of the Code to you or any prospective client upon request.

Item 12: Brokerage Practices

Our Firm does not provide investment advisory services to retail clients. The Firm only provides investment advisory services to institutional advisory plans. As a result, we do not have the discretion to choose the broker-dealer or commission rates to be paid.

The Firm does not utilize any soft-dollar arrangements.

Item 13: Review of Accounts

Accounts under our management and supervision will be reviewed by us on an ongoing basis. You will be contacted, at least annually, by a member of our team to review your financial status, goals, and objectives.

You will receive a written Quarterly Fiduciary Investment Review from us containing the following information:

- Details of your plan's holdings
- Asset allocation of your plan's holdings
- Performance of your plan's holdings over stated time periods and how they compare to selected benchmarks

Item 14: Client Referrals and Other Compensation

We do not receive any additional compensation from any type of revenue sharing arrangement or client referral program.

Item 15: Custody

We do not maintain custody of any account assets. Your account assets are maintained at the custodian of the retirement plan.

Item 16: Investment Discretion

Our Retirement Plan Consulting Services are provided to you on a non-discretionary basis only. A non-discretionary basis means that your Advisory Representative cannot complete a transaction on your account without first getting permission from you.

Item 17: Voting Client Securities

We do not have the authority to vote proxies solicited by, or with respect to, the issuers of securities held in your account. Please contact us at any time with questions you may have regarding proxy solicitations.

Item 18: Financial Information

Paradigm Consulting, Inc. is required to provide you with certain financial information or disclosures about our financial condition. We do not have any financial commitment that impairs our ability to meet contractual commitments to our clients and we have not been the subject of any bankruptcy proceedings.

Item 19: Requirements for State-Registered Advisors

Paradigm Consulting, Inc. is pending registration with the State of New York.

Principal Executive Officers

- Laurie A. Schoen
Additional information regarding Ms. Schoen's education and business background is available on the attached ADV Part 2B Disclosure Brochure.
- Amy L. Mielnicki
Additional information regarding Ms. Mielnicki's education and business background is available on the attached ADV Part 2B Disclosure Brochure.

Performance-based Fees:

Paradigm Consulting, Inc. does not offer performance-based fees and does not engage in side-by-side management.

Disciplinary Information:

There are no legal, regulatory, or disciplinary events involving Paradigm Consulting, Inc. or any of its Supervised Persons. The backgrounds of our Firm and our Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.SEC.gov by searching with the Adviser's firm name. Additional information on our investment advisory disciplinary history is available at:

<https://adviserinfo.sec.gov/firm/summary/144990>