

Item 1. Cover Page

Name of Registered Investment Adviser: PARADIGM WEALTH ADVISORS, LLC	
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This brochure provides information about the qualifications and business practices of PARADIGM WEALTH ADVISORS, LLC. If you have any questions about the contents of this brochure, please contact us at 314-966-3400. 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. Registration with the SEC does not imply a certain level of skill or training.

Additional information about PARADIGM WEALTH ADVISORS, LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. MATERIAL CHANGES SUMMARY

This brochure is required to be updated at least annually, or sooner when material changes to our business take place. For your convenience we have identified and discussed below all material changes that have taken place since our last annual update of this brochure on **February 22, 2011**.

- On December 30, 2011, James T. Reding became 100% owner of Paradigm Financial Advisors, LLC.
- Trade Error Policy was added to Item 12 Section C.

Item 3. Table of Contents

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
4	Advisory Business	4
5	Fees and Compensation	6
6	Performance Based Fees & Side by Side Management	7
7	Types of Clients and Minimum Requirements	7
8	Method of Analysis, Investment Strategies and Risk of Loss	7
9	Disciplinary Information	8
10	Other Financial Industry Activities and Affiliations	9
11	Code of Ethics, Interest in Client Transactions and Personal Trading	9
12	Brokerage Practices	9
12A	Selecting a Broker-Dealer/Custodian	9
12B	Research and Other Soft Dollar Benefits	10
12C	Directed Brokerage	11
13	Review of Accounts	11
13A	Frequency and Triggering Factors	11
13B	Client Reports	12
14	Client Referrals and Other Compensation	12
15	Custody	12
16	Investment Discretion	13
17	Voting Client Securities	13
18	Financial Information	13
Miscellaneous		14
	Anti-Money Laundering	14
	Business Continuity Plan	14

Item 4. Advisory Business

PARADIGM WEALTH ADVISORS, LLC ("PWA") has been operating as an investment advisory firm since 1999. PWA underwent a name change in 2007, formerly being known as Castle Financial Advisory, LLC. Its sole principal owner is James T. Reding. Mr. Reding is also the only investment advisory representative of PWA.

PWA was formed for the purpose of creating a federally-registered investment advisory firm to provide investment advisory and monitoring services to high net worth and financially sophisticated clients, along with comprehensive financial planning and advisory services. All services rendered are provided on a "fee only" basis.

PWA provides continuous investment supervisory services to its clients. These services include financial planning, portfolio management for individuals and small businesses, and pension consulting services.

PWA currently focuses on providing ongoing family wealth management services for clients wanting a "full-service" relationship on a long-term basis. In an effort to provide unbiased and objective advice, PWA does not sell any financial products and does not accept any sales commissions or referral fees. Our success depends entirely upon the quality of advice, administrative services rendered, and the satisfaction of our clients.

PWA offers advice limited to the following types of investments: Equity Securities, Corporate Debt Securities, Certificates of Deposit, Municipal Securities, Options Contracts, Mutual Fund and other Investment Company Securities including Variable Life Insurance, Variable Annuities, U.S. Government Securities, and Partnership Investing.

PWA's primary approach for clients is objective professional advice with recommendations geared to individual life goals, current and future resources and personal constraints. By putting goal achievement ahead of investment performance, the intended result is a wealth management program dedicated to the client, instead of solely investment result-oriented advice. PWA customizes asset allocation and financial planning strategies for clients with the goal of maximizing our clients' financial quality of life.

With respect to PWA's investment advisory services, our services typically involve the creation of an Investment Policy Statement, which essentially serves the same purpose as a business plan. It provides a long-term vision of what is to be achieved and articulates the strategy that will be used to pursue the personal goals of the client. The development of and adherence to such a plan is an ongoing activity that can be measured, monitored, reviewed and revised. It provides the criteria for making appropriate changes, as well as the discipline or structure for realistically pursuing a client's specific objectives. PWA reviews financial data and personal goals and objectives, such as financial, estate, tax and charitable planning, provided by the client to determine the appropriate recommendations suitable for the client's wealth management program, retirement income and investment strategy. The client may also impose restrictions on investing in certain securities or types of securities.

For smaller accounts that we manage as a favor to clients, such as client employee SEP plans, an Investment Policy Statement is not created. Investment recommendations are made based upon the

client's risk tolerance level as determined from their client profile questionnaire. These clients are not considered "full-service" clients.

More specific information regarding our services is as follows:

INVESTMENT ADVISORY AGREEMENT: PWA provides continuous investment supervisory services over client assets that are generally held in accounts with Schwab Institutional or TD Ameritrade Institutional or occasionally with another custodian. Schwab Institutional is a division of Schwab & Co. For Accounts held at TD Ameritrade Institutional, clearing of securities transactions is handled through TD Ameritrade Clearing, Inc.

Under our advisory agreement, assets are held with one or more broker accounts selected by the client for custody and execution service. PWA is independent and unaffiliated with any broker-dealer. The clients work with PWA to authorize and direct PWA to purchase and sell stocks, bonds, mutual funds and other equity securities consistent with the investment objectives of the client in these accounts.

Utilizing the same agreement, PWA also provides investment advisory services for assets held outside of Schwab Institutional or TD Ameritrade Institutional accounts. Such assets may include 401(k) accounts, IRA's, deferred compensation plans and brokerage accounts. Clients are responsible for providing PWA with timely and accurate information regarding these assets. When possible, the client will be asked to supply access instructions and/or passwords authorizing PWA to have electronic access to view these accounts so that we have access to accurate information. If electronic access is not possible, copies of bank, brokerage firm or custodian's most recent month-end or quarterly statements will be acceptable. If PWA has access to these accounts electronically, PWA will buy/sell securities for the client on their behalf.

Full Service Relationship

PWA's "full service" clients also receive ongoing COMPREHENSIVE FINANCIAL PLANNING & ADVISORY SERVICES, described as follows:

1. **PERSONALIZED INVESTMENT PLANNING:** development of investment policy statement or statement of specific investment objectives, review of client goals and objectives, determination of an appropriate asset allocation, selection of individual securities or specific mutual funds, monitoring of performance, and rebalancing recommendations for portfolio as necessary.
2. **FINANCIAL PLANNING AND FORECASTING:** projected future values, inflation adjusted income, and tax analysis.
3. **IMPLEMENTATION PLAN:** sources and use of funds and time horizons.
4. **MONITORING:** consolidated detailed reporting and evaluation on quarterly basis.
5. **COORDINATION WITH OVERALL FINANCIAL PLANS:** cash flow, budgeting, tax, retirement income, education funding, insurance sufficiency, estate and legacy planning.

PWA provides "full service" clients these bundled services of investment advisory and monitoring along with ongoing comprehensive financial planning advisory services to help clients develop and remain "on track" with their long term plans.

Assets Under Management

PWA provides investment advice to clients on either a non-discretionary or a discretionary basis. As of December 31, 2011, PWA's total assets under management are as follows:

Discretionary Clients = \$79,260,463

Non-Discretionary Clients = \$4,072,431

Total = \$83,332,894

Item 5. Fees and Compensation

PWA charges an annual fee, which is a percentage of client's assets under management, according to the following fee schedule:

Advisory Fee Schedule

- Account value at or below \$1,000,000 is billed at 1.50%.
- Account value between \$1,000,001 - \$2,000,000 is billed at 1.25%.
- Account value at or above \$2,000,001 is billed at 1.00%.

Fees charged by Advisor may be negotiated and vary among clients for similar services.

Generally. PWA enters into an Investment Advisory Service Agreement with each advisory client calling for the payment of fees payable quarterly in advance based upon the net asset value of the account on the last day of the preceding calendar quarter expressed as a percentage of value. PWA's fees do not include custodial fees or securities transaction fees, if any, charged by client's custodian. Mutual funds in which client's assets may be invested charge additional advisory fees and other expenses, as described in each fund's prospectus. ***See additional information under Item 12.***

Clients typically will authorize the deduction of fees from their account on the payment date by the broker-dealer/custodian, or its clearing correspondent, where the account is held. Fees may be aggregated and deducted from one or more selected family accounts. PWA will send a bill to the client's independent qualified custodian. The custodian will then forward applicable fees to PWA, and will send client a statement, at least quarterly, reflecting the deduction of all fees from client's accounts. Client is responsible for verifying the accuracy of the fee calculation, as the custodian will not.

When services commence on anything but the first day of a billing period, the fee for the opening period shall be prorated by the number of calendar days of service divided by total period days. The agreement provides for a daily prorated refund of fees paid in advance if the agreement terminates prior to the end of a quarter, with said fee being returned to the client within 30 days in a normal course of business. The agreement may not be assigned by PWA without the consent of the client. The agreement is terminable by either party upon written notice to the other party. The agreement

may be rescinded by the client within five days of execution upon written notice to PWA, whereby a full refund of all money paid by the client in advance would be refunded, less any execution costs.

In the event a client's portfolio contains securities for which no readily available market quotations exist, a fair market value for such securities is determined based upon the quotation given by an independent market maker or specialist for said security.

Item 6. Performance Based Fees and Side by Side Management

PWA does not charge any performance based fees.

Item 7. Types of Clients and Minimum Requirements

PWA generally provides investment advice to individuals, high net worth individuals, pension and profit sharing plans, trusts, estates, corporations and/or business entities.

PWA does have certain minimum thresholds that have been established to allow PWA to provide the high level of personal services and attention which we believe our clients deserve. PWA imposes a minimum dollar asset value for opening a client account. The minimum initial asset value for accounts is \$500,000 in order to be considered a "full-service" client

All minimum account size amounts may be lowered by PWA in its discretion. When a PWA client asks us to accept someone in their company/firm that is important to them but does not meet our minimum requirements, PWA may waive its minimums.

Item 8. Method of Analysis, Investment Strategies and Risk of Loss

PWA's method of security analysis is generally fundamental, based up sources of information from research materials, corporate rating services, financial newspapers and magazines, annual reports, prospectuses, filings with the SEC and company press releases.

The investment strategies used to implement investment advice given to clients include long term purchases, short term purchases, and margin transactions.

Equity Market Risk. The prices of equity securities held in your portfolio (or underlying funds) may decline in response to certain events taking place around the world, including those directly involving the companies whose securities you own; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Equity securities may involve large price swings and potential for loss. Clients should have a long-term perspective and be able to tolerate potentially sharp declines in value.

Management Risk. There is no guarantee of your portfolio's performance or that your portfolio will meet its objective. The market value of your investments may decline and you may suffer investment loss. PWA's investment strategies may fail to produce the intended results. If PWA's expectations for a particular asset class are not realized in the expected timeframe, your overall performance may suffer.

Municipal Securities Risk. Municipal securities rely on the creditworthiness or revenue production of their issuers or auxiliary credit enhancement features. Municipal securities may be related in such a way that political, economic or business developments affecting one obligation would affect the others. Tax authorities are paying increased attention as to whether interest on municipal obligations is tax exempt, and we cannot assure you that a tax authority will not successfully challenge the exemption of a bond held in your portfolio. The ongoing issues facing the national economy are negatively impacting the economic performance of many issuers of municipal securities, and may increase the likelihood that issuers of securities in which you may invest may be unable to meet their obligations.

Investment Company Securities Risk. With respect to investments in other investment companies (including ETFs, mutual funds, and money market funds), you will indirectly bear any fees and expenses charged by the underlying funds in addition to PWA's direct fees and expenses. Therefore, you could incur higher expenses, many of which may be duplicative. In addition, you may be affected by losses of the underlying funds and the level of risk arising from the investment practices of the underlying funds (such as the use of leverage by the funds). An ETF's shares may trade at a market price above or below their net asset value, and an active trading market for an ETF's shares may not develop or be maintained.

Government Securities Risk. Not all U.S. government securities are backed by the full faith and credit of the U.S. government. It is possible that the U.S. government would not provide financial support to certain of its agencies or instrumentalities if it is not required to do so by law. If a U.S. government agency or instrumentality in which you (or an underlying fund) invest defaults and the U.S. government does not stand behind the obligation, the value or yield of your portfolio could fall.

Debt Securities Risk. When you invest in fixed income securities or in underlying funds that own fixed income securities, the value of your investment and the return of such underlying funds will fluctuate with changes in interest rates. Inflation-indexed bonds decline in value when real interest rates rise. Long-term bonds are generally more sensitive to interest rate changes than short-term bonds. Issuers of fixed-income securities may default on interest and principal payments. Generally, securities with lower debt ratings have greater credit risk. The issuer of a debt security may fail to pay interest or principal when due.

Asset allocation and diversification may help to reduce risk but does not protect you from overall market decline. Mutual funds are subject to internal fees and expenses which are charged against the assets of the mutual fund. These internal charges are an inherent expense of client's account and do not usually occur when purchasing individual securities.

Item 9. Disciplinary Information

In its history, neither PWA, nor any of its investment advisory representatives, has been the subject of any kind of legal or disciplinary event. This includes criminal or civil actions, administrative proceedings, or self-regulatory organization proceedings.

Item 10. Other Financial Industry Activities and Affiliations

In April 2007, James T. Reding acquired a 40% equity interest in Paradigm Financial Advisors, LLC, a fee-only, federally-registered investment advisor. He has aligned PWA's resources and business practices with PFA's, in anticipation of purchasing Robert J. Spindel's 60% ownership interest of PFA at some time in the future. On December 30, 2011, the remaining shares were purchased and James T. Reding became 100% owner of PFA. A Confidential Disclosure Agreement has been signed between each company to maintain the privacy of client information between the firms.

As a licensed attorney, Mr. Reding also maintains a tax law practice for his existing clients. Mr. Reding spends less than 10% of his time on this other activity.

Item 11. Code of Ethics, Interest in Client Transactions and Personal Trading

Related persons of PWA may buy and sell securities they also recommend to clients. Client transactions must be executed before a transaction in the same security by a related person of PWA. Further, such related persons will not compete with PWA's clients in connection with such securities transactions. Clients may have investment strategies different from related persons. PWA adopts and follows policies and procedures regarding securities transactions of its related persons commensurate with its activities and duties to clients. PWA has adopted policies and procedures based on the principle that PWA and its employees owe a fiduciary duty to clients.

PWA has established, maintains and enforces a written Code of Ethics pursuant to Rule 204A-1 under the standards of conduct required of all associated persons to protect the best interest of our clients. The Code of Ethics requires advisory personnel to avoid activities or interests that might interfere with making decisions in the best interests of PWA's clients. In addition, it requires its advisory personnel or supervised persons to submit periodic reports of securities transactions to PWA's CCO for review and to pre-clear transactions in certain securities. In addition, each person subject to these requirements is required to report all violations of which such person becomes aware to the Chief Compliance Officer. PWA has also adopted an insider trading policy that prohibits its employees from trading on material, non-public information. PWA will provide a copy of its Code of Ethics and/or insider trading policy, free of charge, upon the written or oral request of any current or prospective client.

Item 12. Brokerage Practices

A. Selecting a Broker-Dealer/Custodian

PWA may recommend that clients use Schwab Institutional or TD Ameritrade Institutional Services as their broker-dealer/custodian. However the selection of a custodian or brokerage firm is at the client's option.

At least annually, PWA conducts a review of its recommended broker-dealer(s)/custodian(s). PWA's review includes, but is not limited to: Protection of Client's Interest, Full Range of Quality of Service, Overall Fees and Account Costs, and Execution Capability and Quality. As part of this periodic review, PWA considers the service and cost of other providers to determine whether any change should be made. The client should be aware that lower commissions or better execution may be able to be

achieved elsewhere. Also considered, Schwab Institutional and TD Ameritrade have provided PWA with assurance that it provides best execution.

B. Research and Other Soft Dollar Benefits

PWA does not recommend or select certain custodians, brokers or dealers based on the value of products, research or services received. If products, research or services are received, they are received as part of the execution process or custodial relationship.

PWA participates in institutional advisory programs offered by Schwab Institutional and TD Ameritrade Institutional and, as a result, PWA receives certain benefits. Schwab Institutional and TD Ameritrade provide PWA with access to its institutional trading and custody services, which are typically not available to Schwab or TD Ameritrade retail investors. These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them. These services are not contingent upon PWA committing to TD Ameritrade any specific amount of business (assets in custody or trading commissions). Schwab and TD Ameritrade's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For PWA client accounts custodied at Schwab or TD Ameritrade, Schwab and TD Ameritrade generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or TD Ameritrade or that settle into the accounts.

Schwab Institutional and TD Ameritrade also make available to PWA other products and services that benefit PWA but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of PWA's accounts, including accounts not maintained at Schwab or TD Ameritrade.

Schwab and TD Ameritrade's products and services that assist PWA in managing and administering clients' accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of PWA's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

Schwab and TD Ameritrade also offer other services intended to help PWA manage and further develop its business. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. Schwab and TD Ameritrade may make available, arrange and/or pay third-party vendors for the types of services rendered to PWA. Schwab or TD Ameritrade may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to PWA. Schwab and TD Ameritrade may also provide other benefits such as educational events or occasional business entertainment of PWA personnel.

In evaluating whether to recommend that clients custody their assets at Schwab or TD Ameritrade, PWA may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by Schwab or TD Ameritrade, which may create a potential conflict of interest.

C. Directed Brokerage, Trade Aggregation, Trade Errors

PWA executes client securities transactions primarily through the custodial broker-dealer selected by the client.

When using Schwab or TD Ameritrade as the broker-dealer custodian, PWA typically executes transactions only with such firm. If executing transactions directly with specialists and market makers outside Schwab or TD Ameritrade, PWA would be required to transfer trades back into customer accounts at Schwab or TD Ameritrade, with attendant transfer charges. Also, PWA may not be able to achieve the same volume of negotiated transactions as Schwab Institutional or TD Ameritrade Institutional Services, which would increase transaction costs. In PWA's judgment, Schwab and TD Ameritrade provide better qualitative execution than PWA could executing with a market maker or specialist and then transferring the security back into the client's account.

The custodian executing the client's order charges each client a commission to execute transactions in the customers account. The custodian, not PWA, determines the standard commission rate charged to PWA's clients and, while PWA recommends only those custodians whose commission rates PWA believes are competitive, transactions may not always be executed at the lowest available commission rate. PWA strives to execute securities for clients so that total account costs and qualitative execution are the most favorable under the circumstances. With respect to fixed income transactions executed by PWA's representatives through Schwab or TD Ameritrade Institutional, the advisory representative determines, based on a commission schedule adopted by Schwab or TD Ameritrade Institutional, the mark-up or mark-down assigned to bond transactions executed on behalf of clients of PWA. Such commissions are within the guidelines for bond commissions approved by Schwab or TD Ameritrade Institutional. PWA believes such commissions are competitive within the industry.

PWA may bundle separate trade orders of clients if trades in the same security are indicated for more than one account at the same time under similar circumstances. Bundling orders means aggregating, bunching, combining or grouping orders of various individual clients for purposes of executing the orders together as one order, and may be referenced in many varying ways. PWA receives no other benefit as a result of bundling trades. In bundling orders, the intent is to obtain either volume discounts, better price or greater efficiencies on behalf of clients. When bundling orders, the trades are allocated to client accounts in writing in advance of the order being placed. Once the order is executed, the trades are allocated to the clients according to the written allocation. PWA allocates costs associated with a bundled trade on a pro rata basis among all the client accounts involved in a bundled trade. No client account may be favored over any other client account. Client orders are never bundled with orders of any employee or associated person.

If a trading error occurs, the source and cause for the error shall be determined. If the error is the fault of the broker or dealer, the broker or dealer shall correct the error and bear any resulting costs. If the error is the fault of PWA, PWA shall bear the costs of the error. The costs of an order error shall not be borne by the client.

For trade errors resulting in a gain, if the error is the fault of PWA or the broker or dealer, it is PWA's policy to return any monetary gain to the client.

The details of each error will be documented by the trader and submitted to the Compliance Officer for review and filed in PWA's Error Account file.

Item 13. Review of Accounts

A. Frequency and Triggering Factors

For investment advisory clients, James T. Reding, has the primary responsibility for reviewing and monitoring client accounts. Typically, he introduces the client to the firm and is most familiar with the clients' personal financial situation. PWA reviews client accounts at least quarterly, upon client request, or in a response to a change in the client's circumstances. The reviews include asset allocation and performance.

For financial planning, James T. Reding determines the frequency and triggering factors for review, such as changes in tax laws, client circumstances or other defined changes in circumstances. The client and PWA jointly determine the nature and scope of reviews based on the client's needs and objectives.

In reviewing accounts, in most instances, PWA considers the client's retirement plan, if any, the extent to which that plan is being met, the client's risk tolerance level, and whether any adjustments are needed.

B. Client Reports

Upon engagement, PWA prepares and delivers a written Investment Policy Statement and asset allocation plan for most clients. Thereafter, PWA provides written quarterly reports to all clients containing an Asset Allocation Statement, a Portfolio Performance Summary and a Quarterly Portfolio Evaluation. PWA offers clients an annual review meeting to discuss their portfolio, along with any additional recommendations, observations or commentary on significant events.

Item 14. Client Referrals and Other Compensation

PWA does not directly or indirectly compensate any person for client referrals.

PWA emphasizes a "team approach" when providing investment advisory services to its clients. If requested by a client, or if PWA believes legal, insurance or accounting services are required and in the best interests of a client's financial plan, PWA will recommend an independent attorney or accountant. As possible, PWA gives the client multiple names, and the client chooses the actual person with whom the client desires to work. PWA does not pay for client referrals or enter into arrangements with other professionals for client referrals. However, PWA may have a conflict of interest in making these recommendations because it may receive referrals from or do business with professionals that it has recommended to clients. PWA will refer other professionals to its clients only when PWA believes the services provided by the professional suit the client's needs.

Item 15. Custody

PWA is deemed to have custody of certain client funds and securities within the meaning of Rule 206(4)-2 under the Advisers Act based on the fact that (1) certain representatives may serve as Trustee of client trusts; (2) some clients supply access instructions and/or passwords authorizing PWA to have electronic access to view their outside accounts online and (3) many of PWA's clients agree to have PWA's fees deducted directly from their custodial accounts.

All client funds and securities, including funds and securities of trust clients, are maintained in separate accounts for each client by qualified custodians that are not affiliated with PWA. PWA notifies each client of the qualified custodian's name and address and of the manner in which the funds and securities are maintained.

On a quarterly or more frequent basis, each client will receive account statements, in addition to all confirmations, directly from the custodian or investment company where their securities are held. The client should carefully review those statements and compare them with the invoices you receive from PWA. An Independent Representative is appointed to receive account statements on behalf of each trust of which any representative of PWA serves as trustee. The appointed Independent Representative also executes the advisory agreements with PWA and receives quarterly invoices for management fees. In each case involving a fee deduction, the client's qualified custodian withdraws PWA's fee; PWA does not have the power to access client funds directly.

Federally registered advisors with custody must obtain an annual surprise examination of client assets conducted by an independent public accountant. PWA has entered into a written agreement to conduct the surprise exam with the firm of Boyd, Franz & Stephans LLP, located at 999 Executive Parkway, Ste 301, St. Louis, MO 63141. The date of the last exam was October 7, 2010.

Item 16. Investment Discretion

PWA provides investment advice on a discretionary basis, but in some instances on a non-discretionary basis. The client and PWA execute an Investment Advisory Agreement wherein the client grants to PWA a limited power of attorney to act on the Client's behalf for the limited purpose of buying, selling and trading securities and all actions necessary or incident to such activities.

Each client indicates in their Confidential Questionnaire any restrictions or limitations they desire to impose on PWA's investment management services. They are also reminded annually in their Investment Policy Statement or Investment Policy Statement Confirmation to notify PWA if there are any changes to their circumstances or restrictions they wish to impose.

Item 17. Voting Client Securities

It is currently PWA's policy not to exercise proxy voting authority over client securities. PWA does not have authority to vote proxies for its clients on any matters regardless of whether PWA's investment authority is discretionary or non-discretionary. Each client retains sole and absolute authority and responsibility to vote proxies with respect to investments owned by the client.

In cases where James T. Reding is the investment advisory representative and is also serving as Trustee of client trusts, the Independent Representative appointed on the account has the responsibility and holds sole proxy voting authority.

Clients will receive their proxies or other solicitations directly from their custodian. Clients are free to contact us about a particular solicitation and our office will do our best to help them.

Item 18. Financial Information

PWA does not believe there are any financial conditions that are reasonably likely to impair our ability to meet contractual commitments to clients.

Miscellaneous

Anti-Money Laundering

Although it is not a requirement at this time, to help the government fight the funding of terrorism and money laundering activities, we have recently implemented an Anti-Money Laundering Policy, setting forth procedures to detect and potentially report suspicious activity. We will obtain, verify, and record information that identifies each person who opens an account. When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We will also ask to see your driver's license or other identifying documents. PWA will update and expand its procedures as regulations are adopted by the SEC.

Business Continuity Plan

PWA has adopted a business continuity plan (the "Plan") that governs how its operations will be conducted in the case of an internal or external significant business disruption ("SBD"). In the case of an SBD that affects communication with or to PWA, prospective and existing clients are urged to call James T. Reding on his cell phone at (314) 805-9346 or Stacey L. Cheek at (314) 852-8025 for any and all questions that they may have. When possible, PWA's website (www.paradigmclient.com) will be updated with contact information. A copy of the Plan will be made available to any client upon written request.

The custodian can also be reached directly. Schwab Institutional is located at 2423 East Lincoln, Phoenix, AZ 85016 and client service phone number is 877-716-6938 (Heartland Team) or trading 800-874-0432. TD Ameritrade Institutional is located at 4075 Sorrento Valley Blvd., Suite A, San Diego, CA 92121 and client service phone number is 888-354-8361 option 2 (service team 15) or for trading option 1.

In addition, Robert Spindel of Paradigm Financial Advisors, LLC and James T. Reding have executed a Succession Plan Letter of Intent indicating that Robert Spindel would provide for continuity of service to PWA clients in the event of Mr. Reding's untimely death or disability.