

Part 2A of Form ADV: *Firm Brochure*



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This brochure provides information about the qualifications and business practices of Paragon Wealth Strategies LLC. If you have any questions about the contents of this brochure, please contact us at (904) 861-0093 or info@wealthguards.com. 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 Paragon Wealth Strategies LLC also is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Our firm's CRD number is 146543.

Paragon Wealth Strategies LLC is a registered investment advisory firm, registered with the SEC. Registration does not imply a certain level of skill or training.

Item 2 Material Changes

This Firm Brochure, dated 2/7/2012, includes the following changes:

- Item 4 – Advisory Business: updated to reflect Paragon Wealth Strategies LLC's registration as a state-registered investment adviser.
- Item 19 – Requirements for State Registered Advisers: this section has been added in accordance with regulatory requirements for state-registered investment advisers.

The SEC adopted "Amendments to Form ADV" in July, 2010. As a state-registered investment adviser, our firm is required to comply with those reporting and filing requirements. Consistent with the SEC's rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. Furthermore, we will provide you with other interim disclosures about material changes as necessary.

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Item 4 **Advisory Business**

Paragon Wealth Strategies LLC is a state-registered investment adviser with its principal place of business located in Florida. Paragon Wealth Strategies LLC began conducting business in 2008, after departing from its affiliation from 2005-2008 as a branch office of The Householder Group.

Listed below are the firm's principal shareholders (i.e., those individuals and/or entities controlling 25% or more of this company).

- Jonathan N. Castle, Managing Partner & Chief Investment Officer, 51%
- Michelle L. Ash, Managing Partner & Chief Operating Officer, 49%

Paragon Wealth Strategies LLC offers the following three (3) advisory services to our clients:

1. INVESTMENT SUPERVISORY SERVICES ("ISS") **INDIVIDUAL PORTFOLIO MANAGEMENT**

Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy and create and manage a portfolio based on that policy. During our data-gathering process, we determine the client's individual objectives, time horizons, risk tolerance, and liquidity needs. As appropriate, we also review and discuss a client's prior investment history, as well as family composition and background.

We manage these advisory accounts on a discretionary or non-discretionary basis. Account supervision is guided by the client's stated objectives (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations.

Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

The portfolios we construct are not limited to any specific product or service offered by a broker-dealer or insurance company. However, based upon our research and philosophy, our portfolios will typically consist of: and will generally include advice regarding the following securities:

- No-Load Mutual fund shares, often institutional shares not available to retail investors
- Exchange Traded Funds (ETF's)
- Individual Government Fixed-Income Bonds and CD's
- Corporate debt securities (other than commercial paper)

Depending upon the individual client's circumstance, we may offer *advice* on the following types of investments. However, based upon our research and investment philosophy, we will *not* typically use the following types of investments in a portfolio that we construct:

- Exchange-listed securities
- Securities traded over-the-counter
- Certificates of deposit
- Municipal securities
- Variable life insurance
- Variable annuities
- Options contracts on securities
- Interests in partnerships investing in real estate
- Interests in partnerships investing in oil and gas interests
- Interests in partnerships investing in other assets such as equipment leasing

Because some types of investments involve certain additional degrees of risk, they will only be implemented/recommended when consistent with the client's stated investment objectives, tolerance for risk, liquidity and suitability.

How to Engage Our Investment Supervisory Services

To engage us to provide you with investment supervisory services, you will generally be required to enter into a written agreement with us, setting forth the terms and conditions of the engagement and describing the scope of the services

2. MANAGER SELECTION PROGRAMS

We also offer advisory management services to our clients through the Manager Selection Programs (hereinafter, "Programs"). These Programs are sometimes referred to as "Third Party Money Managers" (TPMM's), or "Separately Managed Accounts" (SMA's). The difference between this service and those mentioned in section 1 above is that Paragon is not the investment manager who is choosing, buying, and selling the investment holdings – an outside investment manager provides that function.

Here is a more detailed discussion of how these services work:

- Our firm provides the client with an asset allocation strategy developed through personal discussions in which goals and objectives based on the client's particular circumstances are established. This asset allocation strategy is drafted into the client's Personal Investment Policy Statement ("PIPS").

- Based on the client's individual circumstances and needs (as exhibited in the client's PIPS) we will then perform management searches of various unaffiliated registered investment advisers to identify which registered investment adviser's portfolio management style is appropriate for that client. Factors considered in making this determination include account size, risk tolerance, the opinion of each client and the investment philosophy of the selected registered investment adviser. Clients should refer to the selected registered investment adviser's Firm Brochure or other disclosure document for a full description of the services offered. We are available to meet with clients on a regular basis, or as determined by the client, to review the account.
- Once we determine the most suitable investment adviser(s) for the client, we provide the selected adviser(s) with the client's PIPS. The adviser(s) then creates and manages the client's portfolio based on the client's individual needs as exhibited in the PIPS.
- On an ongoing basis, we monitor the performance of the selected registered investment adviser(s). If we determine that a particular selected registered investment adviser(s) is not providing sufficient management services to the client, or is not managing the client's portfolio in a manner consistent with the client's PIPS, we may suggest that the client contract with a different registered investment adviser and/or program sponsor. Under this scenario, our firm assists the client in selecting a new registered investment adviser and/or program. However, any move to a new registered investment adviser and/or program is solely at the discretion of the client.
- At least annually, we meet with the client to review and update, as necessary, the client's PIPS. However, should there be any material change in the client's personal and/or financial situation, we should be notified immediately to determine whether any review and/or revision of the client's PIPS is warranted.

How to Engage Our Manager Selection Program Services

To engage us to provide you with management selection program services, you will generally be required to enter into a written agreement with us, as well as with the program manager. These agreements will set forth the terms and conditions of the engagement and describe the scope of the services. You will also receive the written disclosure statement of the selected program manager(s) and wrap fee program sponsor (if applicable). These disclosure statement(s) are in addition to the one from us which you are currently reviewing.

3. FINANCIAL PLANNING

We provide financial planning services. Financial planning is a comprehensive evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. Through the financial planning process, all questions, information and analysis are considered as they impact and are impacted by the entire financial and life situation of the client. Clients purchasing this service receive a written report which provides the client with a detailed financial plan designed to assist the client achieve his or her financial goals and objectives.

In general, the financial plan can address any or all of the following areas:

- **PERSONAL:** We review family records, budgeting, personal liability, estate information and financial goals.
- **TAX & CASH FLOW:** We analyze the client's income tax and spending and planning for past, current and future years; then illustrate the impact of various investments on the client's current income tax and future tax liability.
- **INVESTMENTS:** We analyze investment alternatives and their effect on the client's portfolio.
- **INSURANCE:** We review existing policies to ensure proper coverage for life, health, disability, long-term care, and liability.
- **RETIREMENT:** We analyze current strategies and investment plans to help the client achieve his or her retirement goals.
- **DEATH & DISABILITY:** We review the client's cash needs at death, income needs of surviving dependents, estate planning and disability income.
- **ESTATE:** We assist the client in assessing and developing long-term strategies, including as appropriate, living trusts, wills, review estate tax, powers of attorney, asset protection plans, nursing homes, Medicaid and elder law.

Financial Planning Process

We gather required information through in-depth personal interviews. Information gathered includes the client's current financial status, tax status, future goals, returns objectives and attitudes towards risk. We carefully review documents supplied by the client, including a questionnaire completed by the client, and prepare a written report. Should the client choose to implement the recommendations contained in the plan, we suggest the client work closely with his/her attorney, accountant, insurance agent, and/or stockbroker. Implementation of financial plan recommendations is entirely at the client's discretion.

Typically the financial plan is presented to the client within three months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided.

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature.

Client is Not Obligated to Follow Recommendations or Utilize Recommended Services

Financial Planning recommendations are not limited to any specific product or service offered by a broker-dealer or insurance company. All recommendations are of a generic nature. Paragon Wealth Strategies LLC may recommend the services of itself and/or other professionals to implement its recommendations. Clients are advised that a conflict of

interest exists if the Paragon Wealth Strategies LLC recommends its own services. The client is under no obligation to act upon any of the recommendations made by us under a financial planning / consulting engagement . You are also under no obligation to engage the services of any such recommended professional, including ourselves

Client Responsibility to Verify Data Accuracy

In performing our services, we do not attempt to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) through outside sources. We are expressly authorized to rely on information from the client. It is very important that you provide us with accurate information because the recommendations we make will be based on the data you give us. Moreover, it remains your responsibility to promptly notify us if there is ever any change in your financial situation or investment objectives so we may review, evaluate or revisit our previous recommendations and/or services.

How to Engage Our Financial Planning Services

To engage us to provide you with financial planning services, you will generally be required to enter into a written agreement with us, setting forth the terms and conditions of the engagement and describing the scope of the services

GENERAL TERMS APPLIED TO ALL SERVICES

Disclosure Document Provided to Client

A copy of Paragon Wealth Strategies LLC's privacy policy notice and a written disclosure statement that meets the requirements of Rule 204-3 of the Investment Advisers Act of 1940, as amended ("Advisers Act"), shall be provided to each client prior to or contemporaneously with the execution of the Agreement. Any client who has not received a copy of our written disclosure statement at least forty-eight (48) hours prior to executing the Agreement shall have five (5) business days after executing the Management Agreement to terminate our services without cost or penalty. You are presently reading our disclosure document that complies with the requirements of Rule 204-3.

Assignability of Management Agreement

Neither Paragon Wealth Strategies LLC nor the client may assign the Management Agreement without the consent of the other party. Transactions that do not result in a change of actual control or management of Paragon Wealth Strategies LLC shall not be considered an assignment.

AMOUNT OF MANAGED ASSETS

As of 2/2/2012, we were actively managing \$66,442,205 of clients' assets on a discretionary basis plus \$1,569,705 of clients' assets on a non-discretionary basis, and overseeing \$4,033,117 of clients' assets being managed by third-party money managers.

Item 5 Fees and Compensation

INVESTMENT SUPERVISORY SERVICES ("ISS")INDIVIDUAL PORTFOLIO AND MANAGER SELECTION PROGRAMS MANAGEMENT FEES

Our annual fees for Investment Supervisory Services and Manager Selection Programs are based upon a percentage of assets under management and generally range from 0.50% to 1.25%.

The annualized fee for Investment Supervisory Services and/or Manager Selection Programs is charged as a percentage of assets under management, according to the following tiered fee schedule:

<u>Assets Under Management</u>	<u>Annual Fee</u>
\$0 - \$999,999.99	1.25%
\$1,000,000 - \$2,499,999.99	1.00%
\$1,500,000 - \$4,999,999.99	0.80%
\$5,000,000 - \$9,999,999.99	0.70%
\$10,000,000 - \$24,999,999.99	0.60%
Over \$25 Million	0.50%

Minimum account size and grouping of related client accounts

A minimum of \$500,000 of assets under management is required for this service. This account size may be negotiable under certain circumstances. Paragon Wealth Strategies LLC may group certain related client accounts for the purposes of achieving the minimum account size and determining the annualized fee. (Example: Client has an IRA account and individual brokerage account, each worth \$250,000. These two accounts will be grouped to achieve the \$500,000 minimum of assets under management.)

However, Paragon Wealth Strategies LLC will not group related client accounts for the purposes of achieving the assets under management or a higher tier on the fee schedule under any of the following circumstances:

- Assets not managed by the firm but held with the firm's Custodian will never be included in calculation of the assets under management or a higher tier on the fee schedule.
- If a client has assets managed by the firm but held at different Custodians, these assets will not consolidate in order to achieve a higher tier on the different programs' respective fee schedules.
- If a client has assets managed by the firm, held at the same Custodian, but through separate service options, these assets' values will not consolidate in order to achieve a higher tier on the different programs' respective fee schedules. (Example: One account through Investment Supervisory Services and another through Manager Selection Programs).

Accommodation Accounts and Non-managed Accounts

Paragon Wealth Strategies LLC reserves the right to offer clients the ability to open accounts with the firm that will not be managed by us. We refer to these accounts as "accommodation accounts" and/or "non-managed" accounts. The purpose of these accounts is, among other things, to allow clients the opportunity to consolidate assets with one Custodian. As mentioned in the previous paragraph, these accounts will not be considered when calculating a client's assets under management or the client's tiered fee. However, Paragon Wealth Strategies LLC will be responsible for servicing these accounts, to include placing client-directed trades, assisting clients with adding or withdrawing funds, and other account service needs. Paragon reserves the right to withdraw this feature at any time during the client relationship by "de-linking" an account from Paragon's authorization with the Custodian. If an account is de-linked, it will become a retail account of the Custodian, and the client will contact the Custodian for trading and servicing of the account. Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Direct Debit

Our firm directly debits advisory fees from client accounts when possible based on client account type and client authorization through our Management Agreement. The advisory fee will be debited quarterly, in advance, based upon the market value of the assets on the last day of the previous quarter as valued by the Custodian. Our fees will vary each quarter based on the value of the assets we manage. If the value of the assets goes up, our fee will increase. If the value of the assets goes down, our fee will decrease.

Calculation of Advisory Fees

Our advisory fees are calculated each quarter by applying the tiered fee schedule above to the total amount of assets in the client accounts we manage, and then dividing the annual fee into quarterly installments of $\frac{1}{4}$ of the annual amount.

An example of this calculation is as follows:

Assets Under Management as of 12/31/2011 = \$500,000

Applicable Annual Fee = 1.25%

Calculation: $(\$500,000 \times 1.25\%)/4 = \$1,562.50$ debit for the quarter beginning 1/1/2012

Tiered fee schedule

For clients whose value of assets managed exceeds \$1,000,000 (One Million), a reduced fee based on the tiered schedule will apply. It is important to understand how a tiered fee schedule works. A tiered fee schedule applies the fee for the first tier (in our case, the first \$999,999.99 of assets) to that amount. Assets over that amount have the next tier's amount applied, until that tier's maximum amount is reached. At that point, the third tier is applied, and so on.

Here is an example of how the tiered fee schedule is applied:

Assets Under Management as of 12/31/2011 = \$2,000,000

Applicable Annual Fee =

1.25% on the first \$999,999.99 under management

1.00% on the remaining \$1,000,000.01 under management

Calculation:

$(\$999,999.99 \times 1.25\%)/4 = \$3,125.00$

+ $(\$1,000,000.01 \times 1.00\%)/4 = \$2,500.00$

Total: $\$3,125.00 + \$2,500.00 = \$5,625$ debit for the quarter beginning 1/1/2012

The purpose of a tiered fee schedule is to avoid a potential conflict of interest in growing a client's assets. If our fee schedule was a flat-fee schedule instead of a tiered fee schedule, then a conflict of interest might be created, in that our firm would receive reduced fees by growing a client's account to the point at which the client exceeds a breakpoint. Similarly, a tiered fee schedule also helps a client avoid increased fees if their assets under management decline, which is another consequence of a flat-fee schedule.

Initial Quarter's Advisory Fee

The advisory fee for the initial quarter shall be calculated on a pro rata basis commencing on the day the assets are initially designated to us for management under the Management Agreement. Our firm reserves the right to defer commencement of the initial billing until such time that the account's agreed-to allocation and structure is built, but in no case will this deferred commencement result in a higher fee to the client than they would have otherwise paid had the fee been debited immediately at the time designated to us for management.

Impact of Account Additions or Withdrawals

You may make additions to and withdrawals from the Account at any time, subject to our right to terminate an account. If assets are deposited to or withdrawn from an account after the inception of a quarter the advisory fee payable with respect to the assets will not be prorated based on the number of days remaining in the quarter. Clients may withdraw assets from the account after providing us with notice. All withdrawals are subject to customary securities settlement procedures.

Termination and Advisory Fees

After executing a Management Agreement for our services, clients initially have five (5) business days from the date of execution of the Management Agreement to terminate our services. After that time, the Management Agreement will continue in effect indefinitely from the initial date, but may be terminated at any time upon receipt of written notice to terminate by either party to the other. The written notice must be manually signed by the terminating party. If the Management Agreement is terminated after the commencement of a calendar quarter billing period, the unearned portion of the advisory fee will be promptly refunded to the account it was debited from.

Fee Increases

No increase in the Management Fee shall be effective without prior written notification to the client.

Custodian's Statements, Client Responsibility

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting period. Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Direct Billing Option

Instead of direct debit of advisory fees from client accounts, clients may request to be billed for fees incurred. In these circumstances, the calculation of our fees is identical to that described in the preceding paragraphs. Instead of direct debit from the client account, the client will be sent an invoice for payment of advisory fees. Generally, we will request payment under Net 10 terms. Termination of our services after the commencement and payment for a calendar quarter billing period will result in the unearned portion of the advisory fee being promptly refunded to the client by check sent via regular mail.

Limited Negotiability of Advisory Fees

Although Paragon Wealth Strategies LLC has established the aforementioned fee schedule(s), we retain the discretion to negotiate alternative fees on a client-by-client basis. Client facts, circumstances and needs are considered in determining the fee schedule. These include the complexity of the client, assets to be placed under management, anticipated future additional assets; related accounts; portfolio style, account composition, and reports, among other factors. The specific annual fee schedule is identified in the contract between the adviser and each client. Fee schedules other than as stated at the beginning of this section may be in place with existing clients based on the advisory fees in effect at the time the client entered into the advisory relationship. Discounts, not generally available to our advisory clients, may be offered to family members and friends of associated persons of our firm.

FINANCIAL PLANNING FEES

Paragon Wealth Strategies LLC's Financial Planning fee is determined based on the nature of the services being provided and the complexity of each client's circumstances. All fees are agreed upon prior to entering into a contract with any client.

Our Financial Planning fees are typically calculated and charged on a fixed fee basis, typically ranging from \$185 to \$50,000, depending on the specific arrangement reached with the client.

Our Financial Planning fees may occasionally be calculated and charged on an hourly basis instead of a fixed fee basis, at Paragon's discretion. Our hourly fees range from \$185 to \$350 per hour. Although the length of time it will take to provide a Financial Plan will depend on each client's personal situation, we will provide an estimate for the total hours at the start of the advisory relationship. Under hourly engagements, actual fees are calculated at the end of the engagement and charged in arrears. Fees will be reduced by any retainer requested (see below).

We typically request a retainer upon completion of our initial fact-finding session with the client; however, advance payment will never exceed \$500 for work that will not be completed within six months. The balance is due upon completion of the plan.

Financial Planning Fee Offset:

Paragon Wealth Strategies LLC reserves the discretion to reduce or waive the minimum fixed fee and/or the hourly fee if a financial planning client chooses to engage us for our Investment Supervisory Services or Manager Selection Programs.

OTHER GENERAL INFORMATION (NOT SERVICE-SPECIFIC)

Termination of the Advisory Relationship:

A client agreement may be canceled at any time, by either party, for any reason upon receipt of five (5) days written notice. As disclosed above, certain fees are paid in advance of services provided. Upon termination of any account, any prepaid, unearned fees will be

promptly refunded. In calculating a client's reimbursement of fees, we will pro rate the reimbursement according to the number of days remaining in the billing period (when applicable).

Mutual Fund Fees:

All fees paid to Paragon Wealth Strategies LLC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds and/or ETF's to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. If the fund also imposes sales charges, a client may pay an initial or deferred sales charge. Generally, as a matter of course, Paragon will not recommend funds that impose sales charges. A client could invest in a mutual fund directly, without our services. However, to reduce investor costs, Paragon may use institutional funds not available for direct investment by retail investors. In the case that a client chose to invest in available retail mutual funds directly, the client would not receive the services provided by our firm which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and our fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

Wrap Fee Programs and Separately Managed Account Fees:

Clients participating in separately managed account programs may be charged various program fees in addition to the advisory fee charged by our firm. Such fees may include the investment advisory fees of the independent advisers, which may be charged as part of a wrap fee arrangement. In a wrap fee arrangement, clients pay a single fee for advisory, brokerage and custodial services. Client's portfolio transactions may be executed without commission charge in a wrap fee arrangement. In evaluating such an arrangement, the client should also consider that, depending upon the level of the wrap fee charged by the broker-dealer, the amount of portfolio activity in the client's account, and other factors, the wrap fee may or may not exceed the aggregate cost of such services if they were to be provided separately. We will review with clients any separate program fees that may be charged to clients.

Some Independent Manager(s) may impose more restrictive account requirements and varying billing practices other than ours. In such instances, Paragon may alter our corresponding account requirements and/or billing practices to accommodate those of the Independent Manager(s) or wrap fee program sponsor.

Additional Fees and Expenses:

In addition to our advisory fees, clients are also responsible for the fees and expenses charged by custodians and imposed by broker dealers, including, but not limited to, any transaction charges imposed by a broker dealer with which an independent investment manager effects transactions for the client's account(s). Please refer to the "Brokerage Practices" section (Item 12) of this Form ADV for additional information.

Grandfathering of Minimum Account Requirements and Advisory Fees:

Pre-existing advisory clients are subject to Paragon Wealth Strategies LLC's minimum account requirements and advisory fees in effect at the time the client entered into the advisory relationship. Therefore, our firm's minimum account requirements will differ among clients.

ERISA Accounts:

Paragon Wealth Strategies LLC is deemed to be a fiduciary to advisory clients that are employee benefit plans or individual retirement accounts (IRAs) pursuant to the Employee Retirement Income and Securities Act ("ERISA"), and regulations under the Internal Revenue Code of 1986 (the "Code"), respectively. As such, our firm is subject to specific duties and obligations under ERISA and the Internal Revenue Code that include among other things, restrictions concerning certain forms of compensation. To avoid engaging in prohibited transactions, Paragon Wealth Strategies LLC may only charge fees for investment advice about products for which our firm and/or our related persons do not receive any commissions or 12b-1 fees.

Advisory Fees in General:

Clients should note that similar advisory services may (or may not) be available from other registered (or unregistered) investment advisers for similar or lower fees.

Limited Prepayment of Fees:

Under no circumstances do we require or solicit payment of fees in excess of \$500 more than six months in advance of services rendered.

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

A performance-based fee is a fee based on the firm receiving a share of capital gains on, or capital appreciation of, the assets of the client. Paragon Wealth Strategies LLC **does not offer** advisory relationships that charge performance-based fees.

Item 7 Types of Clients

Paragon Wealth Strategies LLC provides advisory services to the following types of clients:

- Individuals (other than high net worth individuals)
- High net worth individuals

As previously disclosed in the “Fees and Compensation” section (Item 5), our firm has established certain initial minimum account requirements, based on the nature of the service(s) being provided. For a more detailed understanding of those requirements, please review the disclosures provided in each applicable service.

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

METHODS OF ANALYSIS

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting. In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict how long the trend may last and when that trend might reverse.

A risk in using charting is that it may be based on assumptions that prove to be incorrect. Charts reflect the price movements of markets and securities in the past - and while past events and market cycles may repeat themselves, charting past events cannot accurately predict unforeseen political or life events which occur in the future and affect market movements.

Technical Analysis. We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement.

Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Fundamental Analysis. Fundamental analysis attempts to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell).

Generally, we subscribe to the Efficient Market Hypothesis and believe that markets are reasonably efficient and integrate all known and imagined information rapidly throughout the entire market. As such, we and other proponents of the Efficient Market Hypothesis believe that, more often than not, securities are properly priced by the markets themselves and underpricing and inefficiencies are either random, or the result of unexpected and

unforeseeable events which makes them extremely difficult to detect and act upon. In accordance with this philosophy, we will typically recommend low-cost Index Funds or Exchange Traded Funds versus individual securities or actively managed mutual funds that attempt to "beat the market" by identifying underpriced securities and buying those securities versus owning an entire sector, index, or market.

For clients who already own individual securities, and for various reasons do not wish to sell those securities to build an asset allocation portfolio (such as a high tax impact of selling an appreciated security) we will occasionally advise the client on the prudence of holding the security using Fundamental Analysis.

Cyclical Analysis. In this type of technical analysis, we measure the movements of a market sector against the overall market in an attempt to predict the price movement of that particular sector throughout market cycles.

A risk in using cyclical analysis is that it may be based on assumptions that prove to be incorrect.

Mutual Fund and/or ETF Analysis. We look at the experience and track record of the manager of the mutual fund or ETF in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We also look at the underlying assets in a mutual fund or ETF in an attempt to determine if there is significant overlap in the underlying investments held in another fund(s) in the client's portfolio. We also monitor the funds or ETFs in an attempt to determine if they are continuing to follow their stated investment strategy.

A risk of mutual fund and/or ETF analysis is that, as in all securities investments, past performance does not guarantee future results. A manager who has been successful may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a fund or ETF, managers of different funds held by the client may purchase the same security, increasing the risk to the client if that security were to fall in value. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the fund or ETF, which could make the holding(s) less suitable for the client's portfolio.

Third-Party Money Manager Analysis. We examine the experience, expertise, investment philosophies, and past performance of independent third-party investment managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations and leverage as part of our overall periodic risk assessment. Additionally, as part of our due-diligence process, we survey the manager's compliance and business enterprise risks.

A risk of investing with a third-party manager who has been successful in the past is that he/she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of

internal controls necessary to prevent business, regulatory or reputational deficiencies.

Risks for all forms of analysis. Our securities analysis methods rely on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alert to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

INVESTMENT STRATEGIES

We use the following strategy(ies) in managing client accounts, provided that such strategy(ies) are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Asset Allocation. Rather than focusing primarily on securities selection, we attempt to identify an appropriate ratio of securities, fixed income, and cash suitable to the client's investment goals and risk tolerance.

A risk of asset allocation is that the client may not participate in sharp increases in a particular security, industry or market sector. Another risk is that the ratio of securities, fixed income, and cash will change over time due to stock and market movements and, if not corrected, will no longer be appropriate for the client's goals.

Long-term purchases. We purchase securities with the idea of holding them in the client's account for a year or longer. Typically we employ this strategy when:

- We want exposure to a particular asset class over time, regardless of the current projection for this class.

A risk in a long-term purchase strategy is that by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Margin transactions. We may purchase stocks for your portfolio with money borrowed from your brokerage account. This allows you to purchase more stock than you would be able to with your available cash, and allows us to purchase stock without selling other holdings.

A risk in using the leverage available through margin transactions is that, if the value of the margined securities should fall, you may receive a margin call – requiring either the additional deposit of cash, or sale of securities, in order to settle the call. This may occur at a time when it is otherwise not favorable to sell a security.

You must complete an application for margin privileges with your account custodian, and they must approve that request, prior to the ability to use this strategy.

Note: PARAGON does not use margin strategies in any portfolio that we run in-house. We will execute margin strategies only at a client's direction and not in discretionary portfolios.

Option writing. We allow clients to use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset.

The two types of options are calls and puts:

- A call gives you the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock is likely to increase substantially before the option expires.
- A put gives you the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock is likely to fall before the option expires.

There are several possible options strategies we may use:

- We may use options to speculate on the possibility of a sharp price swing. We may also use options to "hedge" a purchase of the underlying security; in other words, we may use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio. A risk of this strategy is that our speculation may be incorrect and the price of the options will be an additional cost which does not provide you any economic benefit.
- We may use "covered calls", in which we sell an option on a security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price. A risk of this strategy is that the buyer of your call may choose to exercise their option, and the security you own will be "called away". If this happens, you will no longer own the security, and will not have the potential benefit of future gains in value, dividends, or income from it.
- We may use a "spreading strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a call option that you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors. A risk of this strategy is that the security may not fluctuate as we anticipate, and the cost of the options will be an additional cost which does not provide you any economic benefit.

You must complete an application for options privileges with your account custodian, and they must approve that request, prior to the ability to use this strategy.

Note: PARAGON does not use options strategies in any portfolios that we run in-house with discretionary authority. Options strategies will only be recommended and implemented based upon individual client needs (such as large, inherited stock positions) and only after detailed discussion of the strategy with that particular client.

RISK OF LOSS

Securities investments are not guaranteed and you may lose money on your investments. You should be prepared to bear this risk. We ask that you work with us to help us understand your tolerance for risk.

Item 9 Disciplinary Information

We are required to disclose any legal or disciplinary events that are material to a client's or prospective client's evaluation of our advisory business or the integrity of our management.

Our firm and our management personnel have no reportable disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Conflicts of Interest - General

Clients should be aware that the receipt of additional compensation by Paragon Wealth Strategies LLC and its management persons or employees creates a conflict of interest that may impair the objectivity of our firm and these individuals when making advisory recommendations. We endeavor at all times to put the interest of our clients first as part of our fiduciary duty as a registered investment adviser. We take the following steps to address this conflict:

- We disclose to clients the existence of all material conflicts of interest, including the potential for our firm and our employees to earn compensation from advisory clients in addition to our firm's advisory fees;
- We disclose to clients that they are not obligated to purchase recommended investment products from our employees or affiliated companies;
- We collect, maintain and document accurate, complete and relevant client background information, including the client's financial goals, objectives and risk tolerance;
- Our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances;
- We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed;
- We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm; and
- We educate our employees regarding the responsibilities of a fiduciary, including the

need for having a reasonable and independent basis for the investment advice provided to clients.

Conflicts of Interest - Clients Referred to another Registered Investment Adviser

As previously disclosed in the “Advisory Business” section (Item 4) under the Manager Selection Programs sub-heading, when appropriate we may recommend the services of various registered investment advisers to clients. In exchange for this recommendation, we receive a referral fee from the selected investment adviser. The fee received by us is typically a percentage of the fee charged by that investment adviser to the referred client. The portion of the advisory fee paid to us does not increase the total advisory fee paid to the selected investment adviser by the client. We do not charge the client any fees for these referrals. We will only recommend advisers that pay us a referral fee. Because the assets managed by the other registered investment adviser do not aggregate for fee calculation with assets we may manage for the client directly through our Investment Supervisory Services, the client may incur a higher overall fee by using the combination of these services instead of having Paragon Wealth Strategies LLC manage all of the assets together through our Investment Supervisory Services.

We are aware of the special considerations required under Rule 206(4)-3 of the Investment Advisers Act of 1940. As such, all appropriate disclosure shall be made and all applicable Federal and State laws will be observed.

Please see the preceding section titled, “Conflicts of Interest – General” for the steps we take to address this conflict.

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

Our firm has adopted a Code of Ethics which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities laws.

Fiduciary Duty to Clients

Paragon Wealth Strategies LLC and our personnel owe a duty of loyalty, fairness and good faith towards our clients, and have an obligation to adhere not only to the specific provisions of the Code of Ethics but to the general principles that guide the Code.

Overview

Our Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing

employees to invest for their own accounts.

Our firm and/or individuals associated with our firm may buy or sell for their personal accounts securities identical to or different from those recommended to our clients. In addition, any related person(s) may have an interest or position in a certain security which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, thereby preventing such employee(s) from benefiting from transactions placed on behalf of advisory accounts. For purposes of this Code, the term "security" includes not only stocks, but also options, rights, warrants, futures contracts, and convertible securities. This policy is not applicable for securities that are not "reportable securities", which includes mutual funds, ETF's, money market funds, CD's, commercial paper, and government treasuries.

We may aggregate our employee trades with client transactions where possible and when compliant with our duty to seek best execution for our clients. In these instances, participating clients will receive an average share price and transaction costs will be shared equally and on a pro-rata basis. In the instances where there is a partial fill of a particular batched order, we will allocate all purchases pro-rata, with each account paying the average price. Our employee accounts will be included in the pro-rata allocation.

Policies and Procedures for Implementation of Code of Ethics

As these situations represent actual or potential conflicts of interest to our clients, we have established the following policies and procedures for implementing our firm's Code of Ethics, to ensure our firm complies with its regulatory obligations and provides our clients and potential clients with full and fair disclosure of such conflicts of interest:

- No principal or employee of our firm may put his or her own interest above the interest of an advisory client.
- No principal or employee of our firm may buy or sell securities for their personal portfolio(s) where their decision is a result of information received as a result of his or her employment unless the information is also available to the investing public.
 - It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account. This prevents such employees from benefiting from transactions placed on behalf of advisory accounts.
 - Our firm requires prior approval for any IPO or private placement investments by related persons of the firm.
 - We maintain a list of all reportable securities holdings for our firm and anyone associated with this advisory practice that has access to advisory recommendations ("access person"). These holdings are reviewed on a regular basis by our firm's Chief Compliance Officer or his/her designee.
 - All of our principals and employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
 - We require delivery and acknowledgement of the Code of Ethics by each supervised

person of our firm.

- We have established policies requiring the reporting of Code of Ethics violations to our senior management.
- Any individual who violates any of the above restrictions may be subject to termination.

Employees' Reporting Requirements

Our Code of Ethics includes policies and procedures for the review of employees' quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code also provides for oversight, enforcement and recordkeeping provisions.

Use of Material Non-Public Information Prohibited

Paragon Wealth Strategies LLC's Code of Ethics further includes the firm's policy prohibiting the use of material non-public information. While we do not believe that we have any particular access to non-public information, all employees are reminded that such information may not be used in a personal or professional capacity.

Other Prohibited Actions

Paragon Wealth Strategies LLC and individuals associated with our firm are prohibited from engaging in principal transactions. Principal transactions are transactions that occur with our clients from our own accounts. Paragon Wealth Strategies LLC and individuals associated with our firm are prohibited from transactions that buy securities from you for our own accounts, or sell securities to you from our own accounts.

Paragon Wealth Strategies LLC and individuals associated with our firm are prohibited from engaging in agency cross transactions. An agency cross transaction happens when one person serves as broker to both the buyer and the seller. Paragon Wealth Strategies LLC and individuals associated with our firm are prohibited from acting in this capacity that would help one client sell a holding directly to another client. The reason for this rule is to ensure there is no favoritism of one client over another.

Copy of Code of Ethics Available to Clients

A copy of our Code of Ethics is available to our advisory clients and prospective clients. You may request a copy by email sent to Michelle Ash at michelle.ash@wealthguards.com, or by calling us at (904) 861-0093.

Item 12 Brokerage Practices

Directed Brokerage

For discretionary clients, Paragon Wealth Strategies LLC requires these clients to provide us with written authority to determine the broker dealer to use and the commission costs that will be charged to these clients for these transactions. Please refer to the "Investment Discretion" section (Item 16) for additional information about discretionary clients. Please refer to the "Fees and Compensation" section (Item 5) of this Form ADV for additional information about commission costs.

Brokerage Services Provided by Fidelity

Paragon Wealth Strategies LLC has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides our firm with their "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like Paragon Wealth Strategies LLC in conducting business and in serving the best interests of our clients but that may also benefit us.

Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables Paragon Wealth Strategies LLC to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.

As part of the arrangement, Fidelity also makes available to our firm, at no additional charge to us, certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by Paragon Wealth Strategies LLC (within specified parameters). The brokerage services presently include services such as computer software and related systems support, which allow us to better monitor client accounts maintained at Fidelity. We may receive the software and related support without cost because we render investment management services to clients that maintain assets at Fidelity. The software and related systems support may benefit us, but not our clients directly. In fulfilling our duties to our clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that our receipt of economic benefits from a broker-dealer creates a conflict of interest since these benefits may influence our choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services.

Additionally, we may receive the following benefits from Fidelity through the Fidelity Registered Investment Advisor Group: receipt of duplicate client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its Registered Investment Advisor Group participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to client accounts; and access to an electronic communication net.

Without this arrangement, we might be compelled to purchase the same or similar services at our own expense.

Analysis of Potential Conflict of Interest

As a result of receiving such services for no additional cost, we may have an incentive to continue to use or expand the use of Fidelity's services. We examined this potential conflict of interest when we chose to enter into the relationship with Fidelity and have determined that the relationship is in the best interests of Paragon Wealth Strategies LLC's clients and satisfies our client obligations, including our duty to seek best execution. Though we attempt to determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction.

Best Execution

Our duty to our clients is to seek "best execution". Best execution's most determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, while Paragon Wealth Strategies LLC will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by us will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Paragon Wealth Strategies LLC and Fidelity are not affiliated. Paragon Wealth Strategies LLC will periodically and systematically review its policies and procedures regarding recommending broker-dealers to its client in light of its duty to obtain best execution.

Client-Directed Brokerage

If you prefer, you may direct us in writing to use a particular broker-dealer to execute some or all transactions for you. In that case, you will negotiate terms and arrangements for the account with that broker-dealer, and we will not seek better execution services or prices from other broker-dealers or be able to "batch" your transactions for execution through other broker-dealers with orders for other accounts managed by us (as described below). As a result, you may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. Subject to our duty of best execution, we may decline your request to direct brokerage if, in our sole discretion, such directed brokerage arrangements would result in additional operational difficulties.

Block Trading Policy and Practice

Definition of Block Trading

Block Trading means to submit an order for sale or purchase of a large quantity of securities, sometimes accomplished through aggregating multiple clients' orders. This is also known as creating a "batch", or "batching" an order.

General Policy

As a matter of policy and practice, Paragon Wealth Strategies LLC does not generally block client trades, unless we decide to purchase or sell the same securities for several clients at approximately the same time.

Impacts of Trading Without Block Trades

If we do not block trade, then we implement client transactions separately for each account. Consequently, certain client trades may be executed before others, at a different price and/or commission rate. Additionally, our clients may not receive volume discounts available to advisers who block client trades.

Practice when Block Trading

We may, but are not obligated to, combine or "batch" such orders to obtain best execution, negotiate more favorable commission rates, or to allocate equitably among our clients differences in prices and commissions or other transaction costs that might have been obtained had such orders been placed independently.

Under this procedure, transactions will generally be averaged as to price and allocated among our clients pro rata to the purchase and sale orders placed for each client on any given day. To the extent that we determine to aggregate client orders for the purchase or sale of securities, including securities in which our Advisory Affiliate(s) may invest, we shall generally do so in accordance with applicable rules promulgated under the Advisers Act and no-action guidance provided by the staff of the U.S. Securities and Exchange Commission. We do not receive any additional compensation as a result of the aggregation.

In the event that we determine that a prorated allocation is not appropriate under the particular circumstances, the allocation will be made based upon other relevant factors, which may include:

- When only a small percentage of the order is executed, shares may be allocated to the account with the smallest order or the smallest position or to an account that is out of line with respect to security or sector weightings relative to other portfolios, with similar mandates.
- Allocations may be given to one account when one account has limitations in its investment guidelines which prohibit it from purchasing other securities which are

expected to produce similar investment results and can be purchased by other accounts.

- If an account reaches an investment guideline limit and cannot participate in an allocation, shares may be reallocated to other accounts (this may be due to unforeseen changes in an account's assets after an order is placed).
- With respect to sale allocations, allocations may be given to accounts low in cash.
- In cases when a pro rata allocation of a potential execution would result in a de minimis allocation in one or more accounts, we may exclude the account(s) from the allocation; the transactions may be executed on a pro rata basis among the remaining accounts.
- In cases where a small proportion of an order is executed in all accounts, shares may be allocated to one or more accounts on a random basis.

Item 13 Review of Accounts

INVESTMENT SUPERVISORY SERVICES- INDIVIDUAL PORTFOLIO MANAGEMENT

REVIEWS: While the underlying securities within Individual Portfolio Management Services accounts are continually monitored, these accounts are reviewed at least quarterly. Accounts are reviewed in the context of each client's stated investment objectives and guidelines. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political or economic environment.

These accounts are reviewed by one or more of the following individuals:

Jonathan N. Castle, Managing Partner and Chief Investment Officer

Michelle L. Ash, Managing Partner

Michael W. Carignan, Financial Advisor

REPORTS: In addition to the monthly statements and confirmations of transactions that clients receive from their broker-dealer, we provide quarterly reports summarizing account performance, balances and holdings.

SELECTION and MONITORING of MANAGER SELECTION PROGRAMS

REVIEWS: These clients should refer to the independent registered investment adviser's Firm Brochure (or other disclosure document used in lieu of the brochure) for information regarding the nature and frequency of reviews provided by that independent registered investment adviser.

Paragon Wealth Strategies LLC will provide reviews on a quarterly basis.

These accounts are reviewed by: Jonathan N. Castle, Managing Partner and Chief Investment officer.

REPORTS: These clients should refer to the independent registered investment adviser's Firm Brochure (or other disclosure document used in lieu of the brochure) for information regarding the nature and frequency of reports provided by that independent registered investment adviser.

Paragon Wealth Strategies LLC does not typically provide reports in addition to those provided by the independent registered investment adviser selected to manage the client's assets.

FINANCIAL PLANNING SERVICES

REVIEWS: While reviews may occur at different stages depending on the nature and terms of the specific engagement, typically no formal reviews will be conducted for Financial Planning clients unless otherwise contracted for.

REPORTS: Financial Planning clients will receive a completed financial plan. Additional reports will not typically be provided unless otherwise contracted for.

GENERAL INFORMATION APPLICABLE TO ALL SERVICES

All investment advisory clients are encouraged to discuss their needs, goals, and objectives with us and to keep us informed of any changes thereto. Paragon Wealth Strategies LLC shall contact ongoing investment advisory clients at least annually to review our previous services and/or recommendations and to discuss the impact resulting from any changes in the client's financial situation and/or investment objectives.

Item 14 Client Referrals and Other Compensation

CLIENT REFERRALS

Our firm may pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. Whenever we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our *Firm Brochure*) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our firm;
- the fact that the Solicitor is being paid a referral fee;

- the amount of the fee; and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of firm practice, the advisory fees paid to us by clients referred by solicitors are **not** increased as a result of any referral.

OTHER COMPENSATION

Our firm and/or our officers and representatives are NOT eligible to receive incentive awards (including prizes such as trips or bonuses) from any outside firm, investment product company, or custodian.

Item 15 Custody

Custody is a service in which a brokerage or other financial institution holds securities on behalf of the client. Generally, the firm providing brokerage services also provides custody services. Please see the "Brokerage Practices" section (Item 12) for further details.

Our firm does **not** have actual or constructive custody of client accounts.

Discretionary Accounts

For clients for whom we direct brokerage, Fidelity generally has custody of client's securities.

Non-Discretionary Accounts

We may also render non-discretionary investment management services to clients relative to: (1) variable life/annuity products that they may own, and/or (2) their individual employer sponsored retirement plans. In so doing, we either direct or recommend the allocation of client assets among the various mutual fund subdivisions that comprise the variable life/annuity product or the retirement plan. The client assets are maintained at either the specific insurance company that issued the variable life/annuity product owned by the client, or at the custodian designated by the sponsor of the client's retirement plan.

Reporting Requirements and Frequency

We previously disclosed in the "Fees and Compensation" section (Item 5) of this Brochure that our firm directly debits advisory fees from client accounts when possible based on client account type and client authorization through our Management Agreement.

As part of this billing process, the client's custodian is advised of the amount of the fee to be deducted from that client's account. On at least a quarterly basis, the custodian is required to send to the client a statement showing all transactions within the account during the reporting

period.

Because the custodian does not calculate the amount of the fee to be deducted, it is important for clients to carefully review their custodial statements to verify the accuracy of the calculation, among other things. Clients should contact us directly if they believe that there may be an error in their statement.

Item 16 Investment Discretion

Clients may hire us to provide discretionary asset management services, in which case we place trades in a client's account without contacting the client prior to each trade to obtain the client's permission.

Our discretionary authority includes the ability to do the following without contacting the client:

- Determine the security to buy or sell; and/or
- Determine the amount of the security to buy or sell

Clients give us discretionary authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may also change/amend such limitations by once again providing us with written instructions.

MANAGER SELECTION PROGRAMS

As previously disclosed in the “Advisory Business” section (Item 4) of this Brochure, for clients who elect our Manager Selection Programs, we do not “manage” client portfolios in the traditional sense of the definition. Rather, Paragon Wealth Strategies LLC manages the managers of client portfolios within this program. Accordingly, clients participating in this program grant us authority to hire and fire the selected asset manager(s) managing client accounts. Clients give us this authority when they sign a discretionary agreement with our firm, and may limit this authority by giving us written instructions. Clients may change/amend these limitations by once again providing us with updated written instructions.

Item 17 Voting Client Securities

As a matter of firm policy, we do not vote proxies on behalf of clients. Therefore, although our firm may provide investment advisory services relative to client investment assets, clients maintain exclusive responsibility for:

- (1) Directing the manner in which proxies solicited by issuers of securities beneficially owned

by the client shall be voted, and

(2) Making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.

Clients are responsible for instructing each custodian of the assets to forward to the client copies of all proxies and shareholder communications relating to the client's investment assets.

We may provide clients with consulting assistance regarding proxy issues if they contact us with questions at our principal place of business.

Item 18 Financial Information

As an advisory firm that maintains discretionary authority for client accounts, we are also required to disclose any financial condition that is reasonably likely to impair our ability to meet our contractual obligations. Paragon Wealth Strategies LLC has no financial circumstances to report.

Under no circumstances do we require or solicit payment of fees in excess of \$500 per client more than six months in advance of services rendered. Therefore, we are not required to include a financial statement in this document.

Paragon Wealth Strategies LLC has not been the subject of a bankruptcy petition at any time.

Item 19 Requirements for State-Registered Advisers

The following individuals are the principal executive officers and management persons of Paragon Wealth Strategies LLC:

- Jonathan N. Castle, Managing Partner & Chief Investment Officer
- Michelle L. Ash, Managing Partner & Chief Operation Officer

Information regarding their formal education and business background for each of these individuals is provided in their respective Brochure Supplements.

We are required to disclose all material facts regarding certain legal or disciplinary events pertaining to arbitration awards or other civil, regulatory, or administrative proceedings in which our firm or management personnel were found liable or against whom an award was

granted.

Our firm and our management personnel have no reportable disciplinary events to disclose.

As previously disclosed in “Other Financial Industry Activities and Affiliations” (Item 10), neither Paragon Wealth Strategies LLC nor our management personnel have a relationship or arrangement with any issuer of securities.

Part 2B of Form ADV: *Brochure Supplement*
for

Jonathan N. Castle



Paragon Wealth Strategies LLC
10245 Centurion Pkwy N. Ste 105
Jacksonville, Florida 32256

02/07/2012

This brochure supplement provides information about Jonathan N. Castle that supplements the Paragon Wealth Strategies LLC brochure. You should have received a copy of that brochure. Please contact Michelle Ash, Managing Partner, if you did not receive Paragon Wealth Strategies LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan Neal Castle is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational, Background and Business Experience

Full Legal Name: Jonathan Neal Castle

Born: 1967

Education

- The United States Military Academy at West Point; Bachelor of Science, Multi-disciplinary; 1989
- College for Financial Planning; Non-degree program, Certified Financial Planner™ courses; 2006
- The American College; Masters of Science, Financial Services; anticipated 2013

Business Experience

- Paragon Wealth Strategies LLC; Managing Partner & Chief Investment Officer; from 07/2008 to Present
- The Householder Group; Regional Vice President; from 01/2005 to 06/2008
- First Command Financial Planning; District Manager & Registered Principal; from 07/1997 to 01/2005
- First Command Financial Planning; Financial Advisor & Registered Representative; from 07/1995 to 07/1997

Designations

Jonathan Neal Castle has earned the following designation(s) and is in good standing with the granting authority:

- Certified Financial Planner (CFP); Certified Financial Planner Board of Standards, Inc.; 2007

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the

United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

- **Chartered Financial Consultant (ChFC); The American College; 2007**

The ChFC® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold ChFC® certification. To attain the right to use the ChFC® designation, an individual must satisfactorily fulfill the following requirements:

- **Education**: Complete an advanced college-level course of study addressing the financial planning subject areas through nine different courses (7 required and 2 electives), including the following:
 - Financial Planning Process and Environment (Required)
 - Fundamentals of Insurance Planning (Required)
 - Income Taxation (Required)
 - Planning for Retirement Needs (Required)
 - Investments (Required)
 - Fundamentals of Estate Planning (Required)
 - Financial Planning Applications (Required)

- The Financial System in the Economy
 - Estate Planning Applications
 - Executive Compensation
 - Financial Decisions in Retirement
- **Experience:** Three years of full-time business experience is required. The three-year period must be within the five years preceding the date of the award. An undergraduate or graduate degree from an accredited educational institution qualifies as one year of business experience. Part-time qualifying business experience is credited toward the three-year requirement on an hourly basis, with 2,000 hours representing the equivalent of one year full-time experience.
 - **Code of Ethics:** To underscore the importance of ethics the Board of Trustees adopted a Code of Ethics in 1984. Embodied in the Code are the Professional Pledge and eight Canons.
 - **Continuing Education:** All ChFC®s who matriculated after June 30, 1989 are required to earn 30 hours of CE credit every two years:

Item 3 Disciplinary Information

Jonathan Neal Castle has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

1. Jonathan Neal Castle is not engaged in any other investment-related activities.
2. Jonathan Neal Castle does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

1. Jonathan Neal Castle is not engaged in any other non investment-related activities.
2. Jonathan Neal Castle does not receive commissions, bonuses or other compensation on the sale of any other non investment products.

Item 5 Additional Compensation

Jonathan Neal Castle does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Michelle Ash

Title: Managing Partner

Phone Number: (904) 861-0093

Details Regarding Supervisory Oversight Practices:

Paragon Wealth Strategies LLC conducts the majority of its client meetings as a team of advisors, to aid in objectivity and sound decision making. This team approach also allows a supervising advisor to be present during most of the client interactions conducted. Additionally, our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances.

We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed. We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm.

We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

Part 2B of Form ADV: *Brochure Supplement*
for

Michelle Lynne Ash



Paragon Wealth Strategies LLC
10245 Centurion Pkwy N. Ste 105
Jacksonville, Florida 32256

02/07/2012

This brochure supplement provides information about Michelle Lynne Ash that supplements the Paragon Wealth Strategies LLC brochure. You should have received a copy of that brochure. Please contact Jonathan Castle, Managing Partner, if you did not receive Paragon Wealth Strategies LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Michelle Lynne Ash is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational, Background and Business Experience

Full Legal Name: Michelle Lynne Ash

Born: 1973

Education

- University of Louisville; Bachelor of Arts, Spanish/Business; 1995
- Florida State College at Jacksonville; Non-degree program, Certified Financial Planner courses; 2005

Business Experience

- Paragon Wealth Strategies LLC; Managing Partner; from 07/2008 to Present
- The Householder Group; Financial Advisor; from 01/2005 to 06/2008
- First Command Financial Planning; Financial Advisor & Registered Representative; from 04/2002 to 12/2004
- First Command Financial Planning; Practice Manager; from 07/1998 to 04/2002

Designations

Michelle Lynne Ash has earned the following designation(s) and is in good standing with the granting authority:

- Certified Financial Planner (CFP); Certified Financial Planner Board of Standards, Inc.; 2006

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

- **Certified Divorce Financial Analyst; Institute for Divorce Financial Analysts; 2006**

The Certified Divorce Financial Analyst (CDFA)™ is a voluntary certification; no federal or state law or regulation requires financial planners to hold the CDFA™ designation. To qualify as a practicing CDFA™, an individual must satisfactorily fulfill the following requirements:

- **Education**- CDFA™ professionals must develop their theoretical and practical understanding and knowledge of the financial aspects of divorce by completing a comprehensive course of study approved by the IDFA™. This curriculum includes four modules which include the following:
 - Fundamentals of Divorce
 - Financial Issues of Divorce
 - Tax Issues of Divorce
 - Case Studies

- **Examination**- CDFA™ practitioners must pass a four-part Certification Examination that tests their understanding and knowledge of the financial aspects of divorce. In addition, the practitioner must demonstrate the practical application of this knowledge in the divorce process.
- **Experience**- CDFA™ professionals must have a minimum of two years' experience in a financial or legal capacity prior to earning the right to use the CDFA™ certification mark.
- **Ethics**- As a final step to certification, CDFA™ practitioners agree to abide by a strict code of professional conduct known as the IDFA™'s Code of Ethics and Professional Responsibility that sets forth their ethical responsibilities to the public, clients, employers and other professionals. The IDFA™ may perform a background check during this process and each candidate for CDFA™ certification must disclose any investigations or legal proceedings relating to his or her professional or business conduct.
- **Ongoing Certification Requirements**- Once certified, CDFA™ practitioners are required to maintain technical competence and fulfill ethical obligations. Every two years, they must complete a minimum of twenty (20) hours of continuing education, ten (10) of which are specifically related to the field of divorce. In addition, to the biennial continuing education requirement, all CDFA™ practitioners must voluntarily disclose any public, civil, criminal, or disciplinary actions that may have been taken against them during the past two years as part of the renewal process.

Item 3 Disciplinary Information

Michelle Lynne Ash has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

1. Michelle Lynne Ash is not engaged in any other investment-related activities.
2. Michelle Lynne Ash does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

1. Michelle Lynne Ash is not engaged in any other non investment-related activities.

2. Michelle Lynne Ash does not receive commissions, bonuses or other compensation on the sale of any other non investment products.

Item 5 Additional Compensation

Michelle Lynne Ash does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Jonathan Castle

Title: Managing Partner

Phone Number: (904) 861-0093

Details Regarding Supervisory Oversight Practices:

Paragon Wealth Strategies LLC conducts the majority of its client meetings as a team of advisors, to aid in objectivity and sound decision making. This team approach also allows a supervising advisor to be present during most of the client interactions conducted. Additionally, our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances.

We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed. We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm.

We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.

Part 2B of Form ADV: *Brochure Supplement*
for

Michael W Carignan



Paragon Wealth Strategies LLC
10245 Centurion Pkwy N. Ste 105
Jacksonville, Florida 32256

02/07/2012

This brochure supplement provides information about Michael W. Carignan that supplements the Paragon Wealth Strategies LLC brochure. You should have received a copy of that brochure. Please contact Michelle Ash, Managing Partner, if you did not receive Paragon Wealth Strategies LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Michael W. Carignan is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational, Background and Business Experience

Full Legal Name: Michael W. Carignan **Born:** 1973

Education

- The Citadel; Bachelor of Science, Biology, Pre-Med; 1995
- Florida State College at Jacksonville; Non-degree program, Certified Financial Planner courses; 2009

Business Experience

- Paragon Wealth Strategies LLC; Financial Advisor; from 07/2008 to Present
- Merrill Lynch; Financial Advisor; from 05/2006 to 06/2008
- Michael Carignan DBA American Financial and Retirement Services; Financial Advisor; from 06/2005 to 05/2006

Designations

Michael W. Carignan has earned the following designation(s) and is in good standing with the granting authority:

- Certified Financial Planner (CFP); Certified Financial Planner Board of Standards, Inc.; 2010

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning

subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;

- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

- Chartered Retirement Planning Consultant; College for Financial Planning; 2007

The CRPC® designation is a voluntary certification; no federal or state law or regulation requires financial planners to hold CRPC® designation. The CRPC Program focuses on the pre- and post-retirement needs of individuals.

The College for Financial Planning® awards the CHARTERED RETIREMENT PLANNING COUNSELORSM AND CRPC® designation to students who:

- Successfully complete the program which includes studies on the following topics:
 - The Retirement Planning Process & Meeting Multiple Financial Objectives
 - Sources of Retirement Income
 - Personal Savings: Investing for Retirement
 - Employer-Sponsored Plans
 - Individual Deferred Compensation
 - Planning for Incapacity, Disability & Long-Term Care
 - When to Retire
 - Retirement Plan Distributions
 - Asset Management & Investment Strategy During Retirement
 - Income Taxes & the Retiree
 - Estate Planning
 - Retirement Cash Flow Considerations
- Pass the final examination; and
- Comply with the Code of Ethics, which includes agreeing to abide by the Standards of Professional Conduct and Terms and Conditions. Applicants must also disclose of any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct. Conferment of the designation is contingent upon the College for Financial

Planning's review of matters either self-disclosed or which are discovered by the College that are required to be disclosed.

Students must sign and return the Code of Ethics forms within six months of passing the final exam. Failure to complete and submit the forms within this time frame may result in termination of the individual's candidacy. Successful students receive a certificate and are granted the right to use the designation on correspondence and business cards for a two-year period.

Continued use of the CRPC® designation is subject to ongoing renewal requirements. Every two years individuals must renew their right to continue using the CRPC® designation by:

- Completing 16 hours of continuing education;
- Reaffirming to abide by the Standards of Professional Conduct, Terms and Conditions, and self disclose any criminal, civil, self-regulatory organization, or governmental agency inquiry, investigation, or proceeding relating to their professional or business conduct.

Item 3 Disciplinary Information

Michael W. Carignan has no reportable disciplinary history.

Item 4 Other Business Activities

A. Investment-Related Activities

1. Michael W. Carignan is not engaged in any other investment-related activities.
2. Michael W. Carignan does not receive commissions, bonuses or other compensation on the sale of securities or other investment products.

B. Non Investment-Related Activities

1. Michael W. Carignan is not engaged in any other non investment-related activities.
2. Michael W. Carignan does not receive commissions, bonuses or other compensation on the sale of any other non investment products.

Item 5 Additional Compensation

Michael W. Carignan does not receive any economic benefit from a non-advisory client for the provision of advisory services.

Item 6 Supervision

Supervisor: Jonathan Castle or Michelle Ash

Title: Managing Partner(s)

Phone Number: (904) 861-0093

Details Regarding Supervisory Oversight Practices:

Paragon Wealth Strategies LLC conducts the majority of its client meetings as a team of advisors, to aid in objectivity and sound decision making. This team approach also allows a supervising advisor to be present during most of the client interactions conducted. Additionally, our firm's management conducts regular reviews of each client account to verify that all recommendations made to a client are suitable to the client's needs and circumstances.

We require that our employees seek prior approval of any outside employment activity so that we may ensure that any conflicts of interests in such activities are properly addressed. We periodically monitor these outside employment activities to verify that any conflicts of interest continue to be properly addressed by our firm.

We educate our employees regarding the responsibilities of a fiduciary, including the need for having a reasonable and independent basis for the investment advice provided to clients.