



Paragon Financial Partners, Inc.

Form ADV Part 2A – Disclosure Brochure

Effective: March 20, 2021

This Form ADV2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Paragon Financial Partners, Inc. (“Paragon” or the “Advisor”). If you have any questions about the content of this Disclosure Brochure, please contact the Advisor at (310) 557-1515 by email at info@paragonfinancialpartners.com.

Paragon is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The information in this Disclosure Brochure has not been approved or verified by the SEC or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information through Paragon to assist you in determining whether to retain the Advisor.

Additional information about Paragon and its Advisory Persons is available on the SEC’s website at www.adviserinfo.sec.gov by searching with the Advisor’s firm or CRD# 158041.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Paragon. For convenience, the Advisor has combined these documents into a single disclosure document.

Paragon believes that communication and transparency are the foundation of its relationship with clients and will continually strive to provide you with complete and accurate information at all times. Paragon encourages all current and prospective clients to read this Disclosure Brochure and discuss any questions you may have with the Advisor.

Material Changes

There following material changes have been made to this Disclosure Brochure since the last filing and distribution to Clients:

- The Advisor has amended hourly fees for financial planning services. Please see Item 5 for more information.

Future Changes

From time to time, the Advisor may amend this Disclosure Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to you annually and if a material change occurs in the business practices of Paragon.

You may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm or CRD# 158041. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (310) 557-1515 by email at info@paragonfinancialpartners.com.

Item 3 – Table of Contents

Item 1 – Cover Page	1
Item 2 – Material Changes	3
Item 3 – Table of Contents	4
Item 4 – Advisory Services.....	4
A. Firm Information	5
B. Advisory Services Offered	5
C. Client Account Management	6
D. Wrap Fee Programs	6
E. Assets Under Management	6
Item 5 – Fees and Compensation	6
A. Fees for Advisory Services	7
B. Fee Billing	7
C. Other Fees and Expenses	8
D. Advance Payment of Fees and Termination	8
E. Compensation for Sales of Securities	8
Item 6 – Performance-Based Fees and Side-By-Side Management	9
Item 7 – Types of Clients	9
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss	9
A. Methods of Analysis	9
B. Risk of Loss	9
Item 9 – Disciplinary Information	11
Item 10 – Other Financial Industry Activities and Affiliations	11
Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	11
A. Code of Ethics	11
B. Personal Trading with Material Interest	11
C. Personal Trading in Same Securities as Clients	11
D. Personal Trading at Same Time as Client	11
Item 12 – Brokerage Practices	12
A. Recommendation of Custodian[s]	12
B. Aggregating and Allocating Trades	12
Item 13 – Review of Accounts	13
A. Frequency of Reviews	13
B. Causes for Reviews	13
C. Review Reports	13
Item 14 – Client Referrals and Other Compensation	13
A. Compensation Received by Paragon	13
B. Client Referrals from Solicitors	14
Item 15 – Custody	14
Item 16 – Investment Discretion	14
Item 17 – Voting Client Securities	14
Item 18 – Financial Information	14
Form ADV Part 2B – Brochure Supplements	16
Privacy Policy	19

Item 4 – Advisory Services

A. Firm Information

Paragon Financial Partners, Inc. ("Paragon" or the "Advisor") is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). Paragon is organized as a Corporation under the laws of the State of California. Paragon was founded in May 2011, and is owned and operated by President and Chief Compliance Officer, Evan F. Shorten. This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Paragon.

B. Advisory Services Offered

Paragon offers investment advisory services to individuals, high net worth individuals, estates, trusts and businesses (each referred to as a "Client").

The Advisor acts as a fiduciary to Clients, as defined under applicable laws and regulations. As such, each recommendation made as part of the advisory services is based on the belief that the recommendation is in the Client's best interest. Paragon's fiduciary commitment to each Client is further described in the Advisor's Code of Ethics. For more information regarding the Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

Investment Management Services

Paragon provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing both discretionary and non-discretionary investment management and consulting services. Paragon works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Paragon will then construct a portfolio, consisting of exchange listed securities and exchange-traded funds (ETFs), over-the-counter securities, foreign securities, corporate debt securities, mutual funds, CDs, options, margin, variable life insurance, variable annuities, municipal securities, United States government securities, government agency securities, including municipal and government securities that are a part of mutual funds, and interests in partnerships investing in real estate and oil and gas interests to accomplish this objective. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Paragon's investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held for less than one year to meet the objectives of the Client or due to market conditions. Paragon will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Paragon evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Paragon may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Paragon may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Paragon may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the agreement, please see Item 12 – Brokerage Practices.

Financial Planning and Consulting Services

Paragon will typically provide a variety of financial planning and consulting services to individuals, families, and businesses. Services are offered in several areas of a Client's financial situation, depending on their goals and objectives. Paragon also provides specialized planning and negotiation services including divorce financial

planning, negotiation of significant assets, and contract negotiations. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation or business consultation based on the Client's financial goals and objectives. This planning or consulting may encompass one or more areas of need, including, but not limited to investment planning, retirement planning, estate planning, personal savings, insurance needs, education savings, money coaching including general and personalized financial advice, and other areas of a Client's financial situation. A financial plan developed for or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Paragon may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six (6) months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, the Advisor has an incentive to recommend that Clients engage the Advisor for investment management services or to increase the level of investment assets with the Advisor, as it would increase the amount of advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor.

C. Client Account Management

Prior to engaging Paragon to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Paragon, in connection with the Client, will develop a strategy that seeks to achieve the Client's goals and objectives.
- Asset Allocation – Paragon will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance for risk for each Client.
- Portfolio Construction – Paragon will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Paragon will provide investment management and ongoing oversight of the Client's investment portfolio.

D. Wrap Fee Programs

Paragon does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Paragon.

E. Assets Under Management

As of December 31, 2020, Paragon manages \$228,822,002 in Client assets, \$143,340,514 of which are managed on a discretionary basis and \$85,481,488 on a non-discretionary basis. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements that detail the responsibilities of Paragon and the Client.

A. Fees for Advisory Services

Investment Management Services

Investment advisory fees are paid quarterly, in advance of each calendar quarter, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management	Annual Rate
Up to \$1,000,000	1.25%*
\$1,000,001 to \$3,000,000	1.00%
\$3,000,001 to \$6,000,000	0.85%
\$6,000,001 to \$10,000,000	0.75%
Over \$10,000,000	0.65%

* The Advisor has a minimum annual fee of \$10,000.

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the sole discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with the Advisor. All securities held in accounts managed by Paragon will be independently valued by the Custodian. Paragon will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to any applicable securities transaction and custody fees, and other related costs and expenses described in Item 5.C. below, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Financial Planning and Consulting Services

Paragon offers financial planning or consulting services either on an hourly basis or for a fixed fee. Hourly fees range up to \$500. Fixed fees range from \$3,500 to \$100,000. Fees may be negotiable depending on the nature and complexity of each Client's circumstances and the duration of the engagement. An estimate for total hours and/or total costs will be provided to the Client prior to engaging for these services. Based on the financial planning and consulting agreement, Clients will be invoiced in advance on a monthly or quarterly basis. The financial planning and/or consulting agreement will automatically renew, with the same terms, unless notice of termination is given to the Advisor.

B. Fee Billing

Investment Management Services

Investment advisory fees will be calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of each respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Paragon at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Paragon to be paid directly from their accounts held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Financial Planning and Consulting Services

Hourly fees are invoiced by the Advisor on a monthly basis with the final invoice issued in advance of the Client receiving the deliverable[s]. Fixed fees are invoiced in advance either monthly or quarterly, pursuant to the financial planning agreement. Invoices for financial planning fees are due upon receipt by the Client.

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C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Paragon, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian, as applicable. The Advisor's recommended Custodian does not charge securities transaction fees for ETF and equity trades in a Client's account, provided that the account meets the terms and conditions of the Custodian's brokerage requirements. However, the Custodian typically charges for mutual funds and other types of investments. The investment advisory fee charged by Paragon is separate and distinct from these custody and execution fees.

In addition, all fees paid to Paragon for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client may be able to invest in these products directly, without the services of Paragon, but would not receive the services provided by Paragon which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Paragon to fully understand the total fees to be paid.

D. Advance Payment of Fees and Termination

Investment Management Services

Paragon is compensated for its investment management services in advance of the quarter in which investment management services are rendered. Either party may terminate the investment advisory agreement with Paragon, at any time, by providing 30-day advance written notice to the other party. In addition, the Client may also terminate the investment management agreement within five (5) days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Client shall be responsible for investment advisory fees up to and including the effective date of termination. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

Financial Planning and Consulting Services

Financial planning fees are invoiced by the Advisor in advance on either a monthly or quarterly basis. Either party may terminate a planning or consulting agreement at any time by providing 30-day advance written notice to the other party. In addition, the Client may also terminate the financial planning agreement within five (5) days of signing the Advisor's financial planning or consulting agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid fees from the effective date of termination to the end of the month or quarter for which the Client has been invoiced. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior consent.

E. Compensation for Sales of Securities

Paragon does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Evan Shorten is also licensed as an independent insurance professional. As an independent insurance professional, Mr. Shorten will earn commission-based compensation for selling insurance products, including insurance products he sells to Clients. Insurance commissions earned by Mr. Shorten are separate and in addition to Paragon's advisory fees. This practice presents a conflict of interest because a person providing investment advice on behalf of the Advisor who is also an insurance agent has an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on Client needs. However, Clients are under no obligation, contractually or otherwise, to purchase insurance products through Mr. Shorten. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

Paragon does not charge performance-based fees for its investment advisory services. The fees charged by Paragon are as described in Item 5 above and are not based upon the capital appreciation of the funds or securities held by any Client.

Paragon does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Paragon offers investment advisory services to individuals, high net worth individuals, estates, trusts and businesses. The amount of each type of Client is available on Paragon's Form ADV Part 1. These amounts will change over time. Paragon generally requires a minimum relationship size of \$1,000,000 and a minimum annual fee of \$10,000. The Advisor may, at its sole discretion, accept accounts with a lower value or charge a lower annual fee.

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

A. Methods of Analysis

Paragon primarily employs fundamental analysis in developing investment strategies for its Clients. Research and analysis from Paragon is derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Paragon generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Paragon will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Paragon may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Paragon will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's investment approach:

Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs have a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

Bond Risks

Bonds are subject to specific risks, including the following: (1) interest rate risks, i.e. the risk that bond prices will fall if interest rates rise, and vice versa, the risk depends on two things, the bond's time to maturity, and the coupon rate of the bond. (2) reinvestment risk, i.e. the risk that any profit gained must be reinvested at a lower rate than was previously being earned, (3) inflation risk, i.e. the risk that the cost of living and inflation increase at a rate that exceeds the income investment thereby decreasing the investor's rate of return, (4) credit default risk, i.e. the risk associated with purchasing a debt instrument which includes the possibility of the company defaulting on its repayment obligation, (5) rating downgrades, i.e. the risk associated with a rating agency's downgrade of the company's rating which impacts the investor's confidence in the company's ability to repay its debt and (6) Liquidity Risks, i.e. the risk that a bond may not be sold as quickly as there is no readily available market for the bond.

Margin Borrowings

The use of short-term margin borrowings may result in certain additional risks to a Client. For example, if securities pledged to brokers to secure a Client's margin accounts decline in value, the Client could be subject to a "margin call", pursuant to which it must either deposit additional funds with the broker or be the subject of mandatory liquidation of the pledged securities to compensate for the decline in value.

Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor. For more information on our investment management services, please contact the Advisor at (310) 557-1515 by email at info@paragonfinancialpartners.com.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Paragon or its owner. Paragon values the trust Clients place in the Advisor. The Advisor encourages Clients to perform the requisite due diligence on any advisor or service provider that the Client engages. The backgrounds of the Advisor and its Advisory Persons are available on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with the Advisor's firm name or CRD# 158041.

Item 10 – Other Financial Industry Activities and Affiliations

Insurance Agency Affiliations

As noted in Item 5, Mr. Shorten is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Shorten's role with Paragon. As an insurance professional, Mr. Shorten will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Shorten or the Advisor.

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

A. Code of Ethics

Paragon has implemented a Code of Ethics (the "Code") that defines the Advisor's fiduciary commitment to each Client. This Code applies to all persons subject to Paragon's compliance program ("Supervised Persons"). The Code was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Paragon and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Paragon's Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code of Ethics, please contact the Advisor at (310) 557-1515 or by email at info@paragonfinancialpartners.com.

B. Personal Trading with Material Interest

Paragon allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Paragon does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Paragon does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Paragon allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities are recommended (purchase or sell) to Clients presents a conflict of interest that, as fiduciaries, must be disclosed to Clients and mitigated through policies and procedures. As noted above, the Advisor has adopted, consistent with Section 204A of the Investment Advisers Act of 1940, a Code of Ethics, which addresses insider trading (material non-public information controls) and personal securities reporting procedures. When trading for personal accounts, Supervised Persons of Paragon have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Paragon requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO"). The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Paragon allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterward. **At no time will Paragon, or any Supervised Person of Paragon, transact in any security to the detriment of**

any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Paragon does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Paragon to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Paragon does not have the discretionary authority to negotiate commissions on behalf of Clients on a trade-by-trade basis.

Where Paragon does not exercise discretion over the selection of the Custodian, it may recommend the Custodian to Clients for custody and execution services. Clients are not obligated to use the Custodian recommended by the Advisor and will not incur any extra fee or cost associated with using a custodian not recommended by Paragon. However, the Advisor may be limited in the services it can provide if the recommended Custodian is not engaged. Paragon may recommend the Custodian based on criteria such as, but not limited to, reasonableness of commissions charged to the Client, services made available to the Client, its reputation and/or the location of the Custodian's offices.

Paragon will generally recommend that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab") or Fidelity Clearing & Custody Solutions and related entities of Fidelity Investments, Inc. (collectively "Fidelity"), FINRA-registered broker-dealers and members SIPC. Schwab or Fidelity will serve as the Client's "qualified custodian". Paragon maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits from Schwab or Fidelity. Please see Item 14 below.

Following are additional details regarding the brokerage practices of the Advisor:

1. Soft Dollars - Soft dollars are revenue programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with a broker-dealer/custodian in exchange for research and other services. **Paragon does not participate in soft dollar programs sponsored or offered by any broker-dealer/custodian. However, the Advisor does receive certain economic benefits from Schwab. Please see Item 14 below.**

2. Brokerage Referrals - Paragon does not receive any compensation from any third party in connection with the recommendation for establishing an account.

3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Paragon will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Paragon will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian. Paragon will execute its transactions through the Custodian as directed by the Client.

Paragon may aggregate orders in a block trade or trades when securities are purchased or sold through the Custodian for multiple (discretionary) accounts. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does

not consistently advantage or disadvantage particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Mr. Shorten, President of Paragon. Formal reviews are generally conducted quarterly or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least annually. Reviews may be conducted more frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Paragon if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 – Client Referrals and Other Compensation

A. Compensation Received by Paragon

Paragon may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Paragon may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform (Schwab)

Paragon has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Paragon. As a registered investment advisor participating on the Schwab Advisor Services platform, Paragon receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Schwab. Services provided by Schwab Advisor Services benefit the Advisor and many, but not all services provided by Schwab will benefit Clients. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this custodian over one that does not furnish similar software, systems support, or services.

Services that Benefit the Client – Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of Client's funds and securities. Through Schwab, the Advisor may be able to access certain investments and asset classes that the Client would not be able to obtain directly or through other sources. Further, the Advisor may be able to invest in certain mutual funds and other investments without having to adhere to investment minimums that might be required if the Client were to directly access the investments.

Services that May Indirectly Benefit the Client – Schwab provides participating advisors with access to technology, research, discounts and other services. In addition, the Advisor receives duplicate statements for Client accounts, the ability to deduct advisory fees, trading tools, and back office support services as part of its relationship with Schwab. These services are intended to assist the Advisor in effectively managing accounts for its Clients, but may not directly benefit all Clients.

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Services that May Only Benefit the Advisor – Schwab also offers other services to Paragon that may not benefit the Client, including: educational conferences and events, consulting services and discounts for various service providers. Access to these services creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. Paragon believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients.

Participation in Institutional Advisor Platform (Fidelity)

Paragon has established an institutional relationship with Fidelity (“Custodian”) to assist the Advisor in managing Client account[s]. Access to the Fidelity platform is provided at no charge to the Advisor. The Advisor receives access to software and related support without cost because the Advisor renders investment management services to Clients that maintain assets at Fidelity. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of this Custodian over one that does not furnish similar software, systems support, or services.

B. Client Referrals from Solicitors

Paragon does not engage paid solicitors for Client referrals.

Item 15 – Custody

Paragon does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fee. All Clients must place their assets with a “qualified custodian”. Clients are required to engage the Custodian to retain their funds and securities and direct Paragon to utilize that Custodian for the Client's security transactions. Paragon encourages Clients to review statements provided by the account Custodian. For more information about Custodians and brokerage practices, see Item 12 – Brokerage Practices.

If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements in these cases, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

Item 16 – Investment Discretion

Unless engaging for non-discretionary services or financial planning and consulting services, Paragon generally has discretion over the selection and amount of securities to be bought or sold in Client account[s] without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Paragon. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Paragon will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Paragon does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

Item 18 – Financial Information

Neither Paragon, nor its management, have any adverse financial situations that would reasonably impair the ability of Paragon to meet all obligations to its Clients. Neither Paragon, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Paragon is not required to deliver a balance sheet along with

this Disclosure Brochure as the Advisor does not collect advance fees of \$1,200 or more for services to be performed six months or more in the future.



Form ADV Part 2B – Brochure Supplement

for

**Evan F. Shorten
President and Chief Compliance Officer**

Effective: March 20, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Evan F. Shorten (CRD# **2844733**) in addition to the information contained in the Paragon Financial Partners, Inc. (“Paragon” or the “Advisor”) (CRD # 158041) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Paragon Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (310) 557-1515 or by email at info@paragonfinancialpartners.com.

Additional information about Mr. Shorten is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2844733.

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Item 2 – Educational Background and Business Experience

Evan F. Shorten, born in 1973, is dedicated to advising Clients of Paragon in his role as the President and Chief Compliance Officer. Mr. Shorten earned a B.S. in Business Management from California State University, Northridge in 1996. Additional information regarding Mr. Shorten's employment history is included below.

Employment History:

President and Chief Compliance Officer, Paragon Financial Partners, Inc.	06/2011 to Present
Managing Member and Chief Compliance Officer, JVIF, LLC	08/2017 to 08/2018
Founder / President, Paragon Financial Partners	09/2009 to 06/2011
Vice President Senior Account Executive, Fidelity Investments	03/1998 to 09/2009

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Shorten. Mr. Shorten has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Shorten.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Shorten.***

However, the Advisor encourages Clients to independently view the background of Mr. Shorten on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 2844733.

Item 4 – Other Business Activities

Insurance Agency Affiliations

Mr. Shorten is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Shorten's role with Paragon. As an insurance professional, Mr. Shorten will receive customary commissions and other related revenues from the various insurance companies whose products are sold. Commissions generated by insurance sales do not offset regular advisory fees. This practice presents a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Shorten or the Advisor.

Item 5 – Additional Compensation

Mr. Shorten has additional business activities where compensation is received that are detailed in Item 4 above.

Item 6 – Supervision

Mr. Shorten serves as the President and Chief Compliance Officer of Paragon. Mr. Shorten can be reached at (310) 557-1515.

Paragon has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paragon. Further, Paragon is subject to regulatory oversight by various agencies. These agencies require registration by Paragon and its Supervised Persons. As a registered entity, Paragon is subject to examinations by regulators, which may be announced or unannounced. Paragon is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.



Form ADV Part 2B – Brochure Supplement

for

Elean M. Mendoza
Investment Advisor Representative

Effective: March 20, 2021

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Elean M. Mendoza (CRD# **5747083**) in addition to the information contained in the Paragon Financial Partners, Inc. (“Paragon” or the “Advisor”) (CRD # 158041) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the content of the Paragon Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (310) 557-1515 or by email at info@paragonfinancialpartners.com.

Additional information about Mr. Shorten is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5747083.

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Item 2 – Educational Background and Business Experience

Elean M. Mendoza, born in 1985, is dedicated to advising Clients of Paragon in his role as the Investment Advisor Representative. Mr. Mendoza earned a Bachelor of Arts in Economics and a Bachelor of Arts in Art History from University of California, Riverside in 2008. Additional information regarding Mr. Mendoza's employment history is included below.

Employment History:

Investment Advisor Representative, Paragon Financial Partners, Inc.	05/2014 to Present
Investment Advisor Associate, Kayne Anderson Rudnick	03/2013 to 05/2014
Jr. Financial Analyst, North Capital, Inc.	02/2011 to 11/2012
Licensed Personal Banker, JPMorgan Chase	01/2010 to 01/2011
Sales Representative, Apple Retail	10/2008 to 05/2010

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Mendoza. Mr. Mendoza has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Mendoza.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Mendoza.***

However, the Advisor encourages Clients to independently view the background of Mr. Mendoza on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 5747083.

Item 4 – Other Business Activities

Mr. Mendoza is dedicated to the investment advisory activities of Paragon's Clients. Mr. Mendoza does not have any other business activities.

Item 5 – Additional Compensation

Mr. Mendoza is dedicated to the investment advisory activities of Paragon's Clients. Mr. Mendoza does not receive any additional forms of compensation.

Item 6 – Supervision

Mr. Mendoza serves as the Investment Advisor Representative for Paragon. Mr. Mendoza is supervised by Mr. Shorten, President and Chief Compliance Officer of Paragon. Mr. Shorten can be reached at (310) 557-1515.

Paragon has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paragon. Further, Paragon is subject to regulatory oversight by various agencies. These agencies require registration by Paragon and its Supervised Persons. As a registered entity, Paragon is subject to examinations by regulators, which may be announced or unannounced. Paragon is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Privacy Policy

Effective: March 20, 2021

Our Commitment to You

Paragon Financial Partners, Inc. ("Paragon" or the "Advisor") is committed to safeguarding the use of personal information of our Client's (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Paragon (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Paragon does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, Custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Paragon does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Paragon or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
Information About Former Clients Paragon does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

State-specific Regulations

California	In response to a California law, to be conservative, we assume accounts with California addresses do not want us to disclose personal information about you to non-affiliated third parties, except as permitted by California law. We also limit the sharing of personal information about you with our affiliates to ensure compliance with California privacy laws.
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Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting the Advisor at (310) 557-1515 by email at info@paragonfinancialpartners.com.