



**Paradiem, LLC**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: November 1, 2023**

This Form ADV 2A ("Disclosure Brochure") provides information about the qualifications and business practices of Paradiem, LLC (herein "Paradiem" or the "Advisor"). If you have any questions about the contents of this Disclosure Brochure or require information regarding Paradiem, LLC, please contact the Advisor at (985) 727-0770.

Paradiem 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 about Paradiem to assist you in determining whether to retain the Advisor.

Additional information about Paradiem and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 158200.

**Paradiem, LLC**  
510 N Jefferson Ave, Covington, LA 70433  
Phone: (985) 727-0770 | Fax: (985) 612-7007  
[www.paradiem.org](http://www.paradiem.org)

## Item 2 – Material Changes

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

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

### Material Changes

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

- As of November 1, 2023, the Advisor has named Ray Marie Fenger as Chief Compliance Officer
- As of November 1, 2023, the Advisor has named Kristina Schuler as Chief Investment Officer

### 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 Paradiem.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 158200. You may also request a copy of this Disclosure Brochure at any time by contacting the Advisor at (985) 727-0770.

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## Item 4 – Advisory Services

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Paradiem, LLC (herein “Paradiem” or the “Advisor”) is a registered investment advisor with the U.S. Securities and Exchange Commission (“SEC”). The Advisor is organized as a limited liability company (“LLC”) under the laws of the State of Louisiana. The Advisor was established as a registered investment advisor in 2011. Effective January 1, 2022 the Advisor became a wholly owned subsidiary of Paradiem Holding Company, LLC, which is owned by Eric L. Dunavant (President).

This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Paradiem, including asset management and insurance.

Paradiem offers asset management and financial consulting services to individuals, high net worth individuals, families, and charitable organizations (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Paradiem’s fiduciary commitment 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.

### **Kingdom ROI Blueprint, Kingdom Business ROI Blueprint and Consulting Services**

#### **Personal / Family Planning (Kingdom ROI Blueprint)**

Paradiem offers services to help coordinate the various aspects of your family’s finances along with your family relationships. Paradiem seeks to serve families in a role similar to that of a Chief Financial Officer. The following areas are addressed depending on the needs and complexities of each family.

- Year 1
  - Clarity of Goals
    - Impact Interview
    - Written Goals and Intentions
  - Collaboration
    - Coordinate your team of advisors
    - Discuss planning with you’re advisors
    - Quarterback your planning
  - Tax Planning
    - Review tax returns
    - Annual tax planning
    - Capital Gains Minimization
  - Cash Flow Planning
    - Current cash flow
    - Optimize cash flow
    - Review cash flow scenarios
  - Estate Planning
    - Create estate plan
    - Written legal guidelines
    - Review legal documents
    - Drive excecution of documents
  - Family
    - Improve communication

- Strengthen relationships
  - Intentional Conversations
  - Family Health Insight
  - Give children a voice
- Trusted Advisor
  - Listening Ear
  - Prioritize your needs/desires
  - Quick response to your calls /emails
  - Your advocate
- Charitable Giving
  - Annual Giving Optimization
  - Generosity Interview
- Investments
  - Review holdings and performance
  - Align Investments with planning
- Business
  - Business sale strategies
  - Succession planning
  - Alignment with personal planning
- Implementation
  - Facilitate Implementation of plan
  - Accountability with action items
  - Coordinate and monitor strategies
- Events
  - Exclusive access to events
  - Unique access to our community
- Year 2+
  - Clarity of Goals
    - Annual Update and Review
  - Collaboration
    - Coordinate your team of advisors
    - Discuss planning with you're advisors
    - Quarterback your planning
  - Tax Planning
    - Review tax returns
    - Annual tax planning
    - Capital Gains Minimization
  - Cash Flow Planning
    - Current cash flow
    - Optimize cash flow
    - Review cash flow scenarios
  - Estate Planning
    - Monitor changes for updates
  - Family
    - Develop family values
    - Develop family motto
    - Facilitate family meetings
    - Create family letters
    - Include family in giving

- Improve communication
- Strengthen relationships
- Intentional Conversations
- Family Health Insight
- Give children a voice
- Trusted Advisor
  - Listening Ear
  - Prioritize your needs/desires
  - Quick response to your calls /emails
  - Your advocate
- Charitable Giving
  - Annual Giving Optimization
  - Creation of your giving story
  - Develop giving strategies
  - Identify giving passions
- Investments
  - Audit for obstacles and opportunities
  - Exclusive access to events
  - Unique access to our community
- Business
  - Business sale strategies
  - Succession planning
  - Alignment with personal planning
- Annual Reviews
  - Discuss Ideal outcomes
  - Implement Ideal outcomes
  - Update plan
  - Implement plan changes
- Events
  - Exclusive access to events
  - Unique access to our community

### **Business Planning (Kingdom Business ROI Blueprint)**

Paradiem offers services to help coordinate the various aspects of your business. Paradiem seeks to serve businesses in a role similar to that of a business consultant. The following areas are addressed depending on the needs and complexities of each business.

- Year 1
  - Business Operating System Implementation
  - Clarity of Goals
    - Impact Interview
    - Written Goals and Intentions
  - Collaboration
    - Coordinate your team of advisors
    - Discuss planning with your advisors
    - Quarterback your planning
  - Trusted Advisor
    - Listening Ear
    - Prioritize your needs/desires
    - Quick response to your calls /emails

- Your advocate
- Leadership
  - Define Culture
  - Formalized Core Values
  - Documented Vision
  - Develop purpose
  - Documented Mission
- Operations
  - Streamline Key Processes
  - Develop KPIs
  - Build Meeting Optimization
- Marketing
  - Identify Core Customers
  - Define Differentiators
- Finance
  - Cash Flow Planning
  - Tax Planning
  - Informal Valuation
  - Growth Analysis
  - Charitable Giving Strategies
  - Sale Strategies
- Personnel
  - Employee Care & Compensation Strategies
  - Define Organizational Structure
  - Right People, Right Seats
- Legal
  - Buy-Sell Agreements
  - Structure Analysis
  - Business Continuity
- Implementation
  - Facilitate Implementation of Plan
  - Accountability with Action Items
  - Coordinate and Monitor Strategies
- Events
  - Exclusive access to events
  - Unique access to our community
- Year 2+
  - Business Operating System
    - Coordinate Annual and Quarterly Meeting Updates
  - Clarity of Goals
    - Annual Update and Review
  - Collaboration
    - Coordinate your team of advisors
    - Discuss planning with you're advisors
    - Quarterback your planning
  - Trusted Advisor
    - Listening Ear
    - Prioritize your needs/desires
    - Quick response to your calls /emails

- Your advocate
- Leadership
  - Review
    - Culture Sustainability
    - Core Values
    - Vision
    - Purpose
    - Mission
- Operations
  - Process Review
  - Annualized KPI Monitoring
  - Facilitate Meeting Optimization
- Marketing
  - Monitor Ideal Customer Avatar
  - Re-visit Market Differentiators
- Finance
  - Optimize Current Cash Flow
  - Current & Future State Projections
  - Tax Planning
  - Valuation & Growth Analysis
  - Charitable Giving Strategies
  - Sale Strategies
- Personnel
  - Employee Care & Compensation Review
  - Review Organizational Structure
- Legal
  - Monitor Changes for Updates to:
    - Buy-Sell Agreements
    - Structure Analysis
    - Business Continuity
- Annual Reviews
  - Discuss Ideal outcomes
  - Implement Ideal outcomes
  - Update plan
  - Implement plan changes
- Events
  - Exclusive access to events
  - Unique access to our community

Planning or consulting services may also encompass one or more areas of specific need, including but not limited to, investment planning, retirement planning, personal savings, education savings and other areas of a Client's financial situation. The Advisor may provide guidance on any type of security, depending on the needs, goals, financial situation and current positions held by a Client. The Advisor may also provide guidance on non-securities investment products, as appropriate.

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 would pose a conflict, as it would increase the amount of advisory fees paid to the Advisor. This causes a conflict of interest; to



mitigate this conflict Clients always have the right to choose to implement any recommendation with any broker-dealer or insurance agency. Clients always have the right to decide whether to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to implement on any of the recommendations made by the Advisor, the Client always has the right to execute the transaction through another advisor. The Investment Advisor Representatives (herein "Advisory Persons") will typically receive commissions for the implementation of recommendations for insurance transactions, in their separate capacity as insurance professionals.

### **Investment Management Services**

Paradiem provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary and non-discretionary investment management and consulting services. Paradiem works with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation to create a portfolio strategy. Paradiem constructs portfolios with individual equity securities, exchange-traded funds ("ETFs"), individual fixed income securities and mutual funds to achieve the Client's investment goals. For certain Clients, the Advisor may recommend investment in Class F-2 shares offered through American Funds Services ("AFS"), a low cost mutual fund option, which do not include 12(b)-1 fees. Paradiem's investment approach is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Paradiem 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 the acceptance by the Advisor.

Paradiem evaluates and selects ETFs and mutual funds for inclusion in Client portfolios only after applying their internal due diligence process. Paradiem may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Paradiem 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. Paradiem 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 Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

Prior to rendering investment advisory services, Paradiem will ascertain, in conjunction with the Client, the Client's financial situation, risk tolerance, and investment objective[s]. Paradiem will provide investment advisory and related services. At no time will Paradiem accept or maintain custody of a Client's funds or securities. All Client assets will be managed within their designated account[s] at the Custodian, pursuant to the Client investment advisory agreement.

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

At no time will Paradiem accept or maintain custody of a Client's funds or securities, except for the limited authority as outlined in Item 15 – Custody. All Client assets will be managed within the designated account[s] at the Custodian, pursuant to the terms of the advisory agreement. Please see Item 12 – Brokerage Practices.

These services may include:

- Establishing an Investment Strategy – Paradiem, in connection with the Client, will develop a strategy that seeks to achieve the Client’s goals and objectives.
- Asset Allocation – Paradiem 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 – Paradiem will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Paradiem will provide investment management and ongoing oversight of the Client’s investment portfolio.

*Retirement Plan Accounts* – When deemed to be in the Client’s best interest, the Advisor will recommend that a Client roll over its retirement plan account into an account managed by the Advisor. In such instances, the Advisor will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 (“ERISA”). Such a recommendation creates a conflict of interest as the Advisor will earn a new (or increase its current) advisory fee as a result of the rollover. No client is under any obligation to roll over retirement plan assets to an account managed by the Advisor.

Paradiem does manage a wrap fee program. For certain Clients, the Advisor will include the securities transaction fees together with investment advisory fees to provide the Client with a single, bundled fee structure. Including these fees into a single asset-based fee is considered a “Wrap Fee Program”. The Advisor customizes its investment management services for its Clients. The Advisor sponsors the Paradiem Wrap Fee Program solely as a supplemental disclosure regarding the combination of fees. Depending on the level of trading required for the Client’s account[s] in a particular year, the Client may pay more or less in total fees than if the Client paid its own transaction fees. Please see Appendix 1 – Wrap Fee Program Brochure, which is included as a supplement to this Disclosure Brochure.

As of December 31, 2022, the Advisor manages \$337,835,101 in Client assets, \$336,953,643 of which are managed on a discretionary basis and \$881,458 on a non-discretionary basis.

*In addition, as of December 31, 2022, the Advisor also has \$380,342,114 in assets under advisement (“AUA”), attestable to ongoing consulting services provided to Clients of the Advisor. Clients may request more current information at any time by contacting the Advisor.*

## **Item 5 – Fees and Compensation**

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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 Paradiem and the Client.

### **A. Fees for Advisory Services**

#### **Planning and Consulting Services**

Planning engagements are typically offered on a fixed fee per engagement that is based on the complexity and duration of the planning services provided. An estimate of the duration and work effort will be determined prior to establishing the advisory relationship. Planning fees may be negotiable at the sole discretion of the Advisor.

In certain instances, Clients may be offered an hourly fee for financial planning and consulting services at a rate of up to \$500 per hour.

The Advisor's fee is exclusive of, and in addition to, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs. The hourly fees are determined after considering many factors, such as the level and scope of the services.

Paradiem's Planning and Consulting Services are completed in offered in three levels of service, based on a fixed, negotiated retainer fee (as listed below). Fees are determined based on the complexity of the Client's situation and the anticipated effort and duration associated with the scope of work. All fees will be presented to the client BEFORE engagement of the relationship to ensure that all parties are in agreement to the scope of the work.

<b>Wealth Counseling Service</b>	<b>Monthly Fee Rate</b>	<b>Annual Fee Rate</b>
Business Planning (Kingdom Business ROI Blueprint)	\$5,000	\$60,000
Personal / Family Planning (Kingdom ROI Blueprint)	\$5,000	\$60,000
Personal/Business Planning (Kingdom Business ROI & Kingdom ROI Blueprints)	\$8,500	\$102,000

Fees are charged monthly, in advance, or in advance of the engagement, pursuant to the terms of the agreement.

### **Investment Management Services**

Investment advisory fees are paid in advance of each month, 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 last business day of the preceding month.

Investment advisory fees are based on investment program[s] in which the Client's account[s] are invested and are based on the following tiered schedule:

<b>Assets Under Management</b>	<b>Annual Rate (%)</b>
Up to \$500,000	1.25%
\$500,001 to \$2,999,999	1.00%
\$3,000,000 to \$4,999,999	0.80%
\$5,000,000 to \$14,999,999	0.60%
\$15,000,000 - \$29,999,999	0.40%
\$30,000,000 & Over	0.30%

The investment advisory fee in the first month of service is prorated to the inception date of the account[s] to the end of the first month. 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 Paradiem will be independently valued by the Custodian. Paradiem will conduct periodic reviews of the Custodian's valuations.

Depending on the unique and particular complexities of a Client's financial situation, the Advisor may also offer investment management services based on a fixed annual fee arrangement. The total annual fee is determined on a case-by-case basis. Factors considered in setting the fixed-fee generally include the complexity of the Client's financial situation, level of investable assets, and estimated time involved. Other factors considered include the number of household members, number and type of accounts, life stage, business interests, real estate ownership,

trust arrangements, etc. Fixed fees are intended to be competitive with what the Client might expect to pay under an “assets under management” (AUM) approach (assuming all investable assets were managed).

## **B. Fee Billing**

### **Financial Planning and Consulting Services**

Financial planning and consulting fees are invoiced by the Advisor and are due in advance of services rendered. Clients are to pay these fees on a monthly basis. The Advisor will not collect fees that are greater than \$1,200 if the services will be provided six months or more in the future. For annual retainers, the Advisor will bill in advance for services that will be completed in less than six months. Supplemental billing may be required during the year pursuant to the terms of the financial planning and consulting agreement.

Wealth counseling assessment fees are invoiced by the Advisor and are due in advance of services rendered.

Clients may incur certain fees or charges imposed by third parties, other than Paradiem, in connection with recommendations made to the Client. The Client is responsible for all such fees.

### **Investment Management Services**

Investment advisory fees are calculated by the Custodian or delegate and deducted from the Client’s account[s]. The Client shall instruct the Custodian to automatically deduct the investment advisory fee from the Client’s account[s] for each billing period and pay the investment advisory fee[s] to the Advisor. The amount due is calculated by applying the quarterly rate (annual rate divided by 12) to the total assets under management with Paradiem at the beginning of each month. 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 advisory fees to be deducted by Paradiem directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

## **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client’s account[s]. Paradiem includes securities transactions costs as part of its overall investment advisory fee through the Paradiem Wrap Fee Program. Securities transaction fees for Client-directed trades may be charged back to the Client. Please see Item 4.D. above as well as Appendix 1 – Wrap Fee Program Brochure. The inclusion of securities transaction fees into a single bundled fee may cost the Client more or less than if paid separately.

In addition, all fees paid to Paradiem 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 Paradiem, but would not receive the services provided by Paradiem 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 Paradiem to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

## **D. Advance Payment of Fees and Termination**

### **Planning and Consulting Services**

Either party may terminate a planning or consulting agreement at any time by providing written notice to the other party. In addition, the Client may also terminate the advisory agreement within five (5) business days of signing the Advisor's 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. Refunds will be given on a pro-rata basis. The agreement for planning services is effectively terminated upon the presentation of the plan or specific deliverables included in the agreement.

### **Investment Management Services**

Paradiem is compensated for its services in advance of the month in which investment advisory services are rendered. Either party may request to terminate the investment advisory agreement with Paradiem, at any time, by providing advance written notice to the other party. In addition, the Client may also terminate the investment advisory agreement within five (5) business days of signing the Advisor's 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 investment advisory fees from the effective date of termination to the end of the month. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior consent.

## **E. Compensation for Sales of Securities**

Paradiem 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.

### **Insurance Agency Affiliations**

Paradiem is also a licensed insurance agency and certain Advisory Persons are licensed as insurance professionals. Paradiem will earn commission-based compensation for selling insurance products, including insurance products sold to Clients. Insurance commissions earned by Paradiem is separate and in addition to advisory fees. This practice presents a conflict of interest as Advisory Persons and members of Paradiem's management have an incentive to recommend insurance products for the purpose of generating commissions and revenue rather than solely based on Client needs. Paradiem will never earn both a commission and an ongoing advisory fee on the same assets. Additionally, Clients are under no obligation to purchase insurance products through any Advisory Person or Paradiem. Please see Item 10 – Other Financial Industry Activities and Affiliations.

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

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

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Paradiem offers asset management and financial consulting services to individuals, high net worth individuals, families, and charitable organizations. Paradiem generally does not impose a minimum account size for establishing an asset management relationship. Paradiem requires a minimum investment management fee of \$4,000.

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

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Paradiem primarily employs a fundamental analysis method in developing investment strategies for its Clients. Research and analysis from Paradiem 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.

As noted above, Paradiem generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Paradiem 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, Paradiem 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.

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the risk of loss. Paradiem 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. Fundamental analysis utilizes economic and business indicators as investment selection criteria. More details on the Advisor's review process are included in Item 13.

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.

### Equity (Stock) Risks

Common stocks are subject to general stock market fluctuations and to volatile increases and decreases in value as market confidence and perception of their issuers change. There is also a certain level of company or industry specific risk that is inherent in each investment. There is the risk that the company will perform poorly or have its value reduced based on factors specific to the company or its industry,

### 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 has 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.

### Real Estate Investment Trusts ("REITs")

Investing in Real Estate Investment Trusts ("REITs") involves certain distinct risks in addition to those risks associated with investing in the real estate industry in general. Equity REITs may be affected by changes in the value of the underlying property owned by the REITs, while mortgage REITs may be affected by the quality of credit extended. REITs are subject to heavy cash flow dependency, default by borrowers and self-liquidation. REITs, especially mortgage REITs, are also subject to interest rate risk (i.e., as interest rates rise, the value of the REIT may decline).

**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.**

## Item 9 – Disciplinary Information

**There are no legal, regulatory or disciplinary events involving Paradiem or any of its management persons.**

Paradiem and its Supervised Persons value 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](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 158200.

## Item 10 – Other Financial Industry Activities and Affiliations

### Insurance Agency Affiliations

Paradiem also serves as a licensed insurance agency, and as such, may offer insurance products on a commission basis. The Advisor shall generally introduce the Client to an unaffiliated insurance agency to manage the insurance process. The Advisor shall receive a portion of the insurance commission earned by the unaffiliated insurance agency. No client shall be under any obligation to purchase any insurance products from the Advisor or such introduced insurance agency. The recommendation by an Advisory Person that a Client purchase an insurance product presents a conflict of interest, as the receipt of commissions may provide an incentive to recommend insurance products based on commissions to be received, rather than based on a particular Client's need. Clients are reminded that they remain free to purchase insurance products through other insurance agencies.



#### Halcyon Digital Asset Advisors, LLC/Halcyon Digital Asset Advisors GP

The Advisor is under common control and ownership with Halcyon Digital Asset Advisors, LLC ("Halcyon LLC") and Halcyon Digital Asset Advisors GP ("Halcyon GP"). Halcyon LLC serves as the investment advisor and Halcyon GP serves as the general partner to a hedge fund that invests and trades in digital assets that are created through blockchain technologies. Clients of Paradiem, LLC will not be solicited for investment into the hedge fund.

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

Paradiem has implemented a Code of Ethics that defines the Advisor's fiduciary commitment to each Client. This Code of Ethics applies to all persons associated with Paradiem ("Supervised Persons"). The Code of Ethics was developed to provide general ethical guidelines and specific instructions regarding the Advisor's duties to the Client. Paradiem and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Paradiem associates to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code of Ethics covers a range of topics that address employee ethics and conflicts of interest. To request a copy of the Code of Ethics, please contact the Advisor at (985) 727-0770.

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

Paradiem 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 that 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 the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest when 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 Paradiem requiring reporting of personal securities trades in order to determine that the Advisory Persons is not putting the Client into a disadvantage and adhering to the policies and procedures by its Supervised Persons for review by the CCO, pursuant to its Code of Ethics. The Advisor has also adopted written policies and procedures to detect the misuse of material, non-public information. In addition, the Code of Ethics governs Gifts and Entertainment given by and provided to the Advisor, outside employment activities of employees, Employee reporting, sanctions for violations of the Code of Ethics, and records retention requirements for various aspects of the Code of Ethics.

Paradiem allows Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. The Advisor and its affiliated persons often trade alongside its Clients and will often include trades for the accounts of affiliated persons at the same time as its Clients. **At no time, will Paradiem or any Supervised Persons of Paradiem, transact in any security to the detriment of any Client.**

### **Item 12 – Brokerage Practices**

Paradiem 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 Paradiem to direct trades to the Custodian as agreed upon in the wealth management agreement.

The Advisor typically recommends that Clients establish their account[s] at Charles Schwab & Co., Inc. ("Schwab"), a FINRA-registered broker-dealer and member SIPC. Schwab will serve as the Client's "qualified custodian". Paradiem maintains an institutional relationship with Schwab, whereby the Advisor receives economic benefits. Please see Item 14 – Client Referrals and Other Compensation below.

Paradiem may also recommend that Clients establish their account[s] at Mutual Securities, Inc. ("Mutual Securities"), a FINRA-registered broker-dealer and member SIPC. Mutual Securities will serve as the Client's "qualified custodian". Paradiem maintains an institutional relationship with Mutual Securities, whereby the Advisor receives economic benefits from Mutual Securities. Please see Item 14 below.

In addition, the Advisor may recommend that a Client establish their account[s] directly with a mutual fund company. For Client accounts established to invest in AFS Fund Class F-2 shares, American Funds Services will act as the transfer agent for the fund.

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

**1. Soft Dollars** - Soft dollars are 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. Paradiem receives soft dollar economic benefits from Schwab (Please see Item 14). Clients should be aware that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. To mitigate this conflict of interest the benefits received by the Advisor or its Advisory Persons through participation in the program do not depend on the amount of brokerage transactions directed to the Custodian. As part of its fiduciary duties to clients, the Advisor at all times puts the interests of its Clients first.

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

**3. Directed Brokerage** - The Advisor does not utilize directed brokerage and the Client has the ability to choose whom they utilize for a Custodian. If a client engages a Custodian other than Schwab the Advisor's ability to aggregate a trade may be negated.

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 the order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the Custodian.

Paradiem will execute its transactions through the Custodian as authorized by the Client. Paradiem 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.

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## Item 13 – Review of Accounts

Securities in Client accounts are monitored regular and continuous basis, at least monthly by Eric Dunavant, President of the Advisor. Formal reviews are generally conducted at least annually.

In addition to the investment monitoring each Client account shall be internally reviewed at least annually. Reviews may be conducted more or less 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 Paradiem if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

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 or the Custodian may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

#### **Item 14 – Client Referrals and Other Compensation**

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Paradiem 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. Paradiem does not receive compensation for these referrals. Likewise, Paradiem may receive non-compensated referrals of new Clients from various third-parties.

##### Participation in Institutional Advisor Platform

As disclosed under Item 12, above, the Advisor has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Paradiem. As a registered investment advisor participating on the Schwab Advisor Services platform, Paradiem 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 can influence the Advisor's recommendation of Schwab over a custodian 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.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and financial support to Paradiem that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Additionally, Schwab has agreed to pay for certain

services rendered by third parties for which the Advisor would otherwise have to pay. This amount is covered once the value of Client assets in accounts at Schwab reaches a certain size. Clients do not pay more for assets maintained at Schwab as a result of these arrangements. However, the Advisor does benefit from the arrangement because the cost of these services would otherwise be borne directly by the Advisor. Access to these services and financial support creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. Paradiem believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients. Clients should consider these conflicts of interest when selecting a custodian.

#### Participation in Institutional Advisor Platform

Paradiem has established an institutional relationship with Mutual Securities ("Custodian") to assist the Advisor in managing Client account[s]. Access to the Mutual Securities 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 Mutual Securities. 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 potential 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.

#### Insurance Company

As noted in Item 10, Paradiem also serves as an insurance company, where the Advisor may recommend to Clients the purchase of certain insurance products. Paradiem will benefit from any revenue generated from the sale of a recommended insurance product.

#### Compensation for Client Referrals

Certain Clients may be referred to Paradiem by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, Paradiem will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by Paradiem, and shall not result in any additional charge to the Client.

### Item 15 – Custody

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Paradiem does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees, from the Client account at the Custodian. All Clients must place their assets with a qualified custodian. While Paradiem recommends Schwab to be the Custodian, Clients are allowed to engage their own custodian to retain their funds and securities and direct Paradiem to utilize that Custodian for the Client's security transactions. Paradiem would be required to obtain permission to use a custodian other than Schwab due to the oversight role Schwab assumes over the Advisory Persons. Clients should review statements provided by the account custodian and compare to any invoices or reports provided by Paradiem to ensure accuracy, as the custodian does not perform this review. 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, 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**

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Paradiem typically has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. These purchases or sales are subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Paradiem. 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 Paradiem will be in accordance with each Client's investment objectives and goals.

## **Item 17 – Voting Client Securities**

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Paradiem does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements and supporting information directly from the Custodian. If questions arise, Paradiem may assist in answering questions, but cannot accept proxy-voting responsibility.

## **Item 18 – Financial Information**

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Neither Paradiem, nor its management, have any adverse financial situations that would reasonably impair the ability of Paradiem to meet all obligations to its Clients. Neither Paradiem, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Paradiem is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 for services to be performed six months or more in advance.



**Paradiem, LLC**

**Form ADV Part 2A – Appendix 1  
("Wrap Fee Program Brochure")**

**Effective: November 1, 2023**

This Form ADV2A - Appendix 1 ("Wrap Fee Program Brochure") provides information about the qualifications and business practices for Paradiem, LLC ("Paradiem" or the "Advisor") services when offering services pursuant to a wrap program. This Wrap Fee Program Brochure shall always be accompanied by the Paradiem Disclosure Brochure, which provides complete details on the business practices of the Advisor. If you did not receive the complete Paradiem Disclosure Brochure or you have any questions about the contents of this Wrap Fee Program Brochure or the Paradiem Disclosure Brochure, please contact the Advisor at (985) 727-0770.

Paradiem is a registered investment advisor with the U.S. Securities and Exchange Commission ("SEC"). The information in this Wrap Fee Program 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 Wrap Fee Program Brochure provides information about Paradiem to assist you in determining whether to retain the Advisor.

Additional information about Paradiem and its Advisory Persons is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 158200.

## Item 2 – Material Changes

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Form ADV 2 - Appendix 1 provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. In particular, this Wrap Fee Program Brochure discusses wrap fee programs offering by the Advisor.

### Material Changes

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

- The Advisor now recommends Charles Schwab & Co., Inc. ("Schwab") for custodial services. Please see items 12 and 14 for more information.

### Future Changes

From time to time, the Advisor may amend this Wrap Fee Program Brochure to reflect changes in business practices, changes in regulations or routine annual updates as required by the securities regulators. This complete Wrap Fee Program Brochure (along with the complete Paradiem 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 Paradiem.

At any time, you may view this Wrap Fee Program Brochure and the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with the Advisor's firm name or CRD# 158200. You may also request a copy of this Disclosure Brochure at any time, by contacting the Advisor at (985) 727-0770.

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## Item 4 – Services Fees and Compensation

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Paradiem, LLC ("Paradiem" or the "Advisor") provides customized investment advisory services for its Clients. This Wrap Fee Program Brochure is provided as a supplement to the Paradiem Disclosure Brochure (Form ADV 2A). This Wrap Fee Program Brochure is provided along with the complete Disclosure Brochure to provide full details of the business practices and fees when selecting Paradiem as your investment advisor.

As part of the investment advisory fees noted in Item 5 – Fees and Compensation of the Disclosure Brochure, Paradiem includes normal securities transaction fees as part of the overall investment advisory fee. Securities regulations often refer to this combined fee structure as a "Wrap Fee Program". 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 Advisor sponsors the Paradiem Wrap Fee Program.

The sole purpose of this Wrap Fee Program Brochure is to provide additional disclosure relating the combination of securities transaction fees into the single "bundled" investment advisory fee. This Wrap Fee Program Brochure references back to the Paradiem Disclosure Brochure in which this Wrap Fee Program Brochure serves as an Appendix. **Please see Item 4 – Advisory Services of the Disclosure Brochure for details on Paradiem's investment philosophy and related services.**

Advisory services provided by Paradiem are offered in a wrap fee structure whereby normal securities transaction costs are included in the overall investment advisory fee paid to Paradiem. As the level of trading in a Client's account[s] may vary from year to year, the annual cost to the Client may be more or less than engaging for advisory services where the transactions costs are borne separately by the Client. The cost of the Wrap Fee Program varies depending on services to be provided to each Client, however, the Client is not charged more if there is higher trading activity in the Client's account[s] or to utilize securities that do not have transaction fees. As noted above, 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 such, the Advisor is incentivized to utilize ETFs and other equity securities to limit the overall cost to the Advisor. The Advisor will only place Client assets into a Wrap Fee Program when it is believed to be in the Client's best interest. **Please see Item 5 – Fees and Compensation of the Disclosure Brochure for complete details on fees.**

Investment advisory fees are paid quarterly or monthly (herein the "Billing Period"), in advance of each Billing Period, 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 last business day of the preceding Billing Period.

Assets Under Management	Annual Rate (%)
Up to \$500,000	1.25%
\$500,001 to \$2,999,999	1.00%
\$3,000,000 to \$4,999,999	0.80%
\$5,000,000 to \$14,999,999	0.60%
\$15,000,000 - \$29,999,999	0.40%
\$30,000,000 & Over	0.30%

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 Billing Period. 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 Advisor. All securities held in accounts managed by Paradiem will be independently valued by the Custodian. Paradiem will conduct periodic reviews of the Custodian's valuations.

As noted above, the Wrap Fee Program includes normal securities trading costs incurred in connection with the discretionary investment management services provided by Paradiem. Securities transaction fees for Client-directed trades may be charged back to the Client.

Clients may incur certain fees or charges imposed by third parties in connection with investments made on behalf of the Client's account[s]. Under this Wrap Fee Program, Paradiem includes securities transactions costs as part of its overall investment advisory fee.

In addition, all fees paid to Paradiem for investment advisory services or part of the Wrap Fee Program are separate and distinct from the expenses charged by mutual funds and exchange-traded funds 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. Additionally, account activity fees, such as electronic funds and wire transfers fees, certificate delivery fees, markups and markdowns, bid-ask spreads, selling concessions, and other miscellaneous fees and expenses as outlined in the account opening paperwork executed with the Custodian, are generally charged to the Client. Clients are encouraged to refer to the account opening paperwork executed with the Custodian for an outline of all third-party fees not covered under this Wrap Fee Program.

Paradiem is the sponsor and portfolio manager of this Wrap Fee Program. Paradiem receives investment advisory fees paid by Clients for participating in the Wrap Fee Program and pays the Custodian for the costs associated with the management of the Client's account[s].

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## **Item 5 – Account Requirements and Types of Clients**

Paradiem offers investment advisory services to individuals, families and charitable organizations. Paradiem has a minimum relationship size of \$350,000 per household, this minimum may be waived at the sole discretion of the Advisor. Please see Item 7 – Types of Clients in the Disclosure Brochure for additional information.

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## **Item 6 – Portfolio Manager Selection and Evaluation**

### **Portfolio Manager Selection**

Paradiem serves as sponsor and as portfolio manager for the services under this Wrap Fee Program.

### **Related Persons**

Paradiem personnel serve as portfolio managers for this Wrap Fee Program. Paradiem does not serve as a portfolio manager for any third-party wrap fee programs.

### **Performance-Based Fees**

Paradiem does not charge performance-based fees.

### **Supervised Persons**



Paradiem Advisory Persons serve as portfolio managers for all accounts, including the services described in this Wrap Fee Program Brochure. Details of the advisory services provided are included in Item 4.A. of the Disclosure Brochure.

#### Methods of Analysis

Please see Item 8 of the Disclosure Brochure (included with this Wrap Fee Program Brochure) for details on the research and analysis methods employed by the Advisor.

#### 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. Paradiem 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[s]. 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.

**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. Please see Item 8.B. – Risk of Loss in the Disclosure Brochure for details on investment risks.**

#### Proxy Voting

Paradiem 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 7 – Client Information Provided to Portfolio Managers

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Paradiem is the sponsor and sole portfolio manager for the Program. The Advisor does not share Client information with other portfolio managers because it is the sole portfolio manager for this Wrap Fee Program. Please also see the Paradiem Privacy Policy (included after this Wrap Fee Program Brochure).

### Item 8 – Client Contact with Portfolio Managers

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Paradiem is a full-service investment management advisory firm. Clients always have direct access to the Portfolio Managers at Paradiem.

### Item 9 – Additional Information

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Paradiem 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 Advisor Persons are on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching for the Advisor's firm name or CRD# 158200. Please see Item 9 of the Paradiem Disclosure Brochure as well as

Item 3 of each Advisory Person's Brochure Supplement (included with this Wrap Fee Program Brochure) for additional information on how to research the background of the Advisor and its Advisory Persons.

#### Other Financial Activities and Affiliations

Please see Item 10 – Other Financial Industry Activities and Affiliations and Item 14 – Client Referrals and Other Compensation of the Form ADV Part 2A – Disclosure Brochure (included with this Wrap Fee Program Brochure).

Paradiem has implemented a Code of Ethics that defines our fiduciary commitment to each Client. This Code of Ethics applies to all persons subject to Paradiem's compliance program ("Supervised Persons"). Complete details on the Paradiem Code of Ethics can be found under Item 11 – Code of Ethics, Participation in Client Transactions and Personal Trading in the Disclosure Brochure (included with this Wrap Fee Program Brochure).

#### Review of Accounts

Investments in Client accounts are monitored on a regular and continuous basis by Advisory Persons of Paradiem under the supervision of the Chief Compliance Officer ("CCO"). Details of the review policies and practices are provided in Item 13 – Review of Accounts of the Form ADV Part 2A – Disclosure Brochure.

#### Other Compensation

##### Participation in Institutional Advisor Platform

The Advisor has established an institutional relationship with Schwab through its "Schwab Advisor Services" unit, a division of Schwab dedicated to serving independent advisory firms like Paradiem. As a registered investment advisor participating on the Schwab Advisor Services platform, Paradiem 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 can influence the Advisor's recommendation of Schwab over a custodian 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.

*Services that May Only Benefit the Advisor* – Schwab also offers other services and financial support to Paradiem that may not benefit the Client, including: educational conferences and events, financial start-up support, consulting services and discounts for various service providers. Additionally, Schwab has agreed to pay for certain services rendered by third parties for which the Advisor would otherwise have to pay. This amount is covered once the value of Client assets in accounts at Schwab reaches a certain size. Clients do not pay more for assets maintained at Schwab as a result of these arrangements. However, the Advisor does benefit from the arrangement because the cost of these services would otherwise be borne directly by the Advisor. Access to

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Paradiem, LLC

510 N Jefferson, Covington, LA 70433

Phone: (985) 727-0770 | Fax: (985) 612-7007

[www.paradiem.org](http://www.paradiem.org)

these services and financial support creates a financial incentive for the Advisor to recommend Schwab, which results in a conflict of interest. Paradiem believes, however, that the selection of Schwab as Custodian is in the best interests of its Clients. Clients should consider these conflicts of interest when selecting a custodian.

#### Compensation for Client Referrals

Certain Clients may be referred to Paradiem by either an affiliated or unaffiliated party (herein "Promoter") and receive, directly or indirectly, compensation for the Client referral. In such instances, Paradiem will compensate the Promoter a fee in accordance with Rule 206(4)-1 of the Advisers Act and any corresponding state securities requirements. Any such compensation shall be paid solely from the investment advisory fees earned by Paradiem, and shall not result in any additional charge to the Client.

#### Financial Information

Neither Paradiem, nor its management have any adverse financial situations that would reasonably impair the ability of Paradiem to meet all obligations to its Clients. Neither Paradiem, nor any of its Advisory Persons, has been subject to a bankruptcy or financial compromise. Paradiem is not required to deliver a balance sheet along with this Disclosure Brochure, as the firm does not collect advance fees of \$1,200 or more for services to be performed six months or more in advance. Please see Item 18 of the Form ADV Part 2A – Disclosure Brochure.



## Form ADV Part 2B – Brochure Supplement

for

Eric L. Dunavant  
President, Chief Investment Officer

Effective: November 1, 2023

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Eric L. Dunavant (CRD# 3255295) in addition to the information contained in the Paradiem, LLC ("Paradiem" or the "Advisor") Disclosure Brochure (contained herein). If you have not received a copy of this Brochure Supplement or if you have any questions about the contents of this Brochure Supplement or Paradiem's Disclosure Brochure, please contact the Advisor at (985) 727-0770.

Additional information about Eric L. Dunavant is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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The President of Paradiem is Eric L. Dunavant. Mr. Dunavant, born in 1973. Mr. Dunavant earned a B.S. - Agribusiness from Texas A&M University in College Station, TX in 1996. Additional information regarding Mr. Dunavant's employment history is included below.

### Employment History:

Paradiem, LLC	
- President	09/2019 to Present
- President and Chief Compliance Officer	06/2011 to 09/2019
Registered Representative, LPL Financial LLC	11/2007 to 05/2017
Investment Advisor Representative, LPL Financial LLC	11/2007 to 10/2011
Registered Representative, Charles Schwab & Co, Inc.	06/1999 to 11/2007

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Dunavant.** Mr. Dunavant 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. Dunavant. 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. Dunavant.** However, we do encourage you to independently view the background of Mr. Dunavant on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his CRD# 3255295.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Dunavant is also a licensed insurance professional through Paradiem. These services are separate and distinct from the advisory services offered to Clients. Paradiem may include these as part of its overall investment process. However, these are provided as a separate service and fee, which is based on the unique needs of each Client. As an insurance professional, Mr. Dunavant will receive customary commissions and other related revenues from the insurance companies whose products are sold. Mr. Dunavant is not required to offer the products of any particular insurance company. 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 always have the right to choose whether to implement any recommendations made by Mr. Dunavant or the Advisor.

### IC4 Coaching and Consulting LLC d/b/a Kingdom ROI Coaching and Consulting

Mr. Dunavant is the owner of IC4 Coaching and Consulting LLC d/b/a Kingdom ROI Coaching and Consulting ("IC4"). IC4 offers coaching and consulting services in an effort to create life and generational impact through wisdom and communication. Mr. Dunavant serves as the Kingdom ROI Strategist for IC4. Clients of Paradiem may be engaged for these services outside the scope of their asset management agreement with Paradiem. This presents a conflict of interest, as Mr. Dunavant may be incentivized to recommend to Clients of Paradiem that they engage with IC4 for an additional fee.

## **Item 5 – Additional Compensation**

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Mr. Dunavant has additional business activities where compensation is received, which are detailed in Item 4 above.

## **Item 6 – Supervision**

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Mr. Dunavant serves as the President, Chief Investment Officer of Paradiem and is supervised by Ray Marie Fenger, the Chief Compliance Officer. Ms. Fenger can be reached at (985) 727-0770.

Paradiem has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paradiem. Further, Paradiem is subject to regulatory oversight by various agencies. These agencies require registration by Paradiem and its Supervised Persons. As a registered entity, Paradiem is subject to examinations by regulators, which may be announced or unannounced. Paradiem 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

**Carl W. Drury**

## President of Planning

**Effective: November 1, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Carl W. Drury (CRD# 6063550) in addition to the information contained in the Paradiem, LLC formerly E Six Thirteen, LLC ("Paradiem" or the "Advisor") (CRD # 158200) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradiem Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (985) 727-0770.

Additional information about Mr. Drury is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



## Item 2 – Educational Background and Business Experience

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Carl W. Drury is the President of Planning for Paradiem. Mr. Drury, born in 1964, is dedicated to advising Clients of Paradiem. Mr. Drury earned a Bachelor of Science Mechanical Engineering from Purdue University in 1989. Additional information regarding Mr. Drury's employment history is included below.

### Employment History:

Paradiem, LLC	
- President of Planning	09/2018 to Present
- Vice President of Planning	07/2014 to 09/2018
VP & COO, Kardia, Inc.	04/2007 to 07/2014
General Manager Filament Bearings, Rexnord	09/1989 to 04/2007

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Mr. Drury.** Mr. Drury 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. Drury. 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. Drury.** However, we do encourage you to independently view the background of Mr. Drury on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his CRD# 6063550.

## Item 4 – Other Business Activities

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Mr. Drury is dedicated to the advisory activities of Paradiem's Clients. Mr. Drury does not have any other business activities.

## Item 5 – Additional Compensation

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Mr. Drury is dedicated to the advisory activities of Paradiem's Clients. Mr. Drury does not receive any additional forms of compensation.

## Item 6 – Supervision

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Mr. Drury serves as the President of Planning of Paradiem and is supervised by Ray Marie Fenger, the Chief Compliance Officer. Ms. Fenger can be reached at (985) 727-0770.

Paradiem has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Paradiem. Further, Paradiem is subject to regulatory oversight by various agencies. These agencies require registration by Paradiem and its Supervised Persons. As a registered entity, Paradiem is subject to examinations by regulators, which may be announced or unannounced. Paradiem 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

**Danielle R. Wauchope**  
**Vice President of Transformation**

**Effective: November 1, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Danielle R. Wauchope (CRD# 6362274) in addition to the information contained in the Paradiem, LLC formerly E Six Thirteen, LLC ("Paradiem" or the "Advisor") (CRD # 158200) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradiem Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (985) 727-0770.

Additional information about Mrs. Wauchope is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

## Item 2 – Educational Background and Business Experience

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Danielle R. Wauchope is a Vice President of Family Transformation with Paradiem. Ms. Wauchope, born in 1985, is dedicated to advising Clients of Paradiem. Ms. Wauchope earned a Bachelor of Science in Management and Business Administration from Indiana Wesleyan University in 2007. Additional information regarding Ms. Wauchope's employment history is included below.

### Employment History:

Paradiem, LLC	
- Vice President of Family Transformation	09/2018 to Present
- Financial Planner	07/2014 to 09/2018
Financial Planner, Kardia, Inc.	1/2008 to 07/2014
Swing Manager, McDonalds	12/1999 to 12/2007

## Item 3 – Disciplinary Information

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**There are no legal, civil or disciplinary events to disclose regarding Ms. Wauchope.** Ms. Wauchope has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Ms. Wauchope. 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 Ms. Wauchope.** However, we do encourage you to independently view the background of Ms. Wauchope on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching her full name or her CRD# 6362274.

## Item 4 – Other Business Activities

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Ms. Wauchope is dedicated to her church and is heavily active in the church community. This is a volunteer position and is not compensated for her work.

## Item 5 – Additional Compensation

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Ms. Wauchope has additional business activities where no compensation is received, which are detailed in Item 4 above.

## Item 6 – Supervision

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Ms. Wauchope serves as the Vice President, Family Planning and is supervised by Ray Marie Fenger, the Chief Compliance Officer. Ms. Fenger can be reached at (985) 727-0770.

Paradiem has implemented a Code of Ethics, and internal compliance document that guide each Supervised Person in meeting their fiduciary obligations to Clients of Paradiem. Further, Paradiem is subject to regulatory oversight by various agencies. These agencies require registration by Paradiem and its Supervised Persons. As a registered entity, Paradiem is subject to examinations by regulators, which may be announced or unannounced. Paradiem 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**

**Russell L. Riggs**  
**Vice President of Business Transformation**

**Effective: November 1, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Russell L. Riggs (CRD# 6733790) in addition to the information contained in the Paradiem, LLC ("Paradiem" or the "Advisor", CRD# 158200) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradiem Disclosure Brochure or this Brochure Supplement, please contact the Advisor at (985) 727-0775.

Additional information about Mr. Riggs is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6733790.

## Item 2 – Educational Background and Business Experience

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Russell L. Riggs, born in 1985, is dedicated to advising Clients of Paradiem as the Vice President of Business Transformation. Mr. Riggs earned a Bachelor of Arts in Business Administration from Southwestern Assemblies of God University in 2007. Additional information regarding Mr. Riggs's employment history is included below.

### Employment History:

Vice President of Business Transformation, Paradiem, LLC	12/2016 to Present
Insurance Agent, Independent Insurance Producer	10/2015 to Present
District Manager, Avis Budget Group	12/2010 to 10/2015
Corporate Relations Director, D-Tabb Associates	04/2009 to 09/2010
Supervisor, Cole Haan	03/2008 to 04/2009

## Item 3 – Disciplinary Information

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*There are no legal, civil or disciplinary events to disclose regarding Mr. Riggs.* Mr. Riggs 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. Riggs.

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. Riggs.*

However, we do encourage you to independently view the background of Mr. Riggs on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 6733790.

## Item 4 – Other Business Activities

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### Insurance Agency Affiliations

Mr. Riggs is also licensed insurance professional through Paradiem. These services are separate and distinct from the advisory services offered to Clients. Paradiem may include these as part of its overall investment process. However, these are provided as a separate service and fee, which is based on the unique needs of each Client. As an insurance professional, Mr. Riggs will receive customary commissions and other related revenues from the insurance companies whose products are sold. Mr. Riggs is not required to offer the products of any particular insurance company. 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 always have the right to choose whether to implement any recommendations made by Mr. Riggs or the Advisor.

## Item 5 – Additional Compensation

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Mr. Riggs has additional business activities where compensation is received, which are detailed in Item 4 above.

## Item 6 – Supervision

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Mr. Riggs serves as a Director of Business Transformation of Paradiem and is supervised by Ray Marie Fenger, the Chief Compliance Officer. Ms. Fenger can be reached at (985) 727-0770.

Paradiem has implemented a Code of Ethics, and internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paradiem. Further, Paradiem is subject to regulatory oversight by various agencies. These agencies require registration by Paradiem and its Supervised Persons. As a registered entity, Paradiem is subject to examinations by regulators, which may be announced or unannounced. Paradiem 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

**Kristina B. Schuler, CRPC®**  
**Chief Investment Officer & Lead Advisor**

**Effective: November 1, 2023**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of Kristina B. Schuler, CRPC® (CRD# 5735165) in addition to the information contained in the Paradiem, LLC ("Paradiem" or the "Advisor", CRD# 158200) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Paradiem Disclosure Brochure or this Brochure Supplement, please contact us at (985) 727-0770.

Additional information about Mrs. Schuler is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5735165.

## Item 2 – Educational Background and Business Experience

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Kristina B. Schuler, CRPC®, born in 1985, is dedicated to advising Clients of Paradiem as Chief Investment Officer, Lead Advisor. Mrs. Schuler earned a Bachelor of Science degree in Finance from University of Phoenix in 2008. Additional information regarding Mrs. Schuler's employment history is included below.

### Employment History:

Paradiem, LLC	
- Chief Investment Officer, Lead Advisor	11/2023 to Present
- VP, Investment Strategy, Lead Advisor	08/2022 to 10/2023
- Associate Advisor	04 2021 to 08/2022
Wealth Platform Manager, Hancock Whitney	03/2020 to 03/2021
Client Services Manager, Edelman Financial Engines	06/2014 to 03/2020
Government Insuring Specialist/Appraisal Coordinator, NOLA Lending Group	08/2012 to 06/2013
Deputy Compliance Officer, Pritchard Capital Partners	10/2010 to 06/2012

### Chartered Retirement Planning Counselor ("CRPC ®")

Individuals who hold the CRPC® designation have completed a course of study encompassing pre-and post-retirement needs, asset management, estate planning and the entire retirement planning process using models and techniques from real client situations. Additionally, individuals must pass an end-of-course examination that tests their ability to synthesize complex concepts and apply theoretical concepts to real-life situations. All designees have agreed to adhere to Standards of Professional Conduct and are subject to a disciplinary process. Designees renew their designation every two-years by completing 16 hours of continuing education, reaffirming adherence to the Standards of Professional Conduct and complying with self-disclosure requirements.

## Item 3 – Disciplinary Information

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

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 Mrs. Schuler.***

However, we do encourage you to independently view the background of Mrs. Schuler on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with her full name or her Individual CRD# 5735165.

## Item 4 – Other Business Activities

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Mrs. Schuler is dedicated to the investment advisory activities of Paradiem's Clients. Mrs. Schuler does not have any other business activities.

## Item 5 – Additional Compensation

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Mrs. Schuler is dedicated to the investment advisory activities of Paradiem's Clients. Mrs. Schuler does not receive any additional forms of compensation.

#### **Item 6 – Supervision**

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Mrs. Schuler serves as a Chief Investment Officer, Lead Advisor and is supervised by Ray Marie Fenger, the Chief Compliance Officer. Ms. Fenger can be reached at (985) 727-0770.

Paradiem has implemented a Code of Ethics, an internal compliance document that guides each Supervised Person in meeting their fiduciary obligations to Clients of Paradiem. Further, Paradiem is subject to regulatory oversight by various agencies. These agencies require registration by Paradiem and its Supervised Persons. As a registered entity, Paradiem is subject to examinations by regulators, which may be announced or unannounced. Paradiem 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

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Effective: November 1, 2023

### Our Commitment to You

Paradiem, LLC ("Paradiem" or the "Advisor") is committed to safeguarding the use of your personal information that we have as your Investment Advisor. Paradiem (referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and make efforts to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust.

We do not sell your non-public personal information to anyone. Nor does Paradiem provide such information to others except for discrete and proper business purposes in connection with the servicing and management of your account 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 privacy policy.

### The Information We Collect About You

You typically provide personal information when you complete the paperwork required to become our Client. This information may include your:

• Name and address	• Assets
• E-mail address[es]	• Income
• Phone number[s]	• Account balance
• Social security or taxpayer identification number	• Investment activity
	• Accounts at other institutions

In addition, we may collect non-public information about you from the following sources:

- Information we receive on Brokerage Agreements, Managed Account Agreements and other Subscription and Account Opening Documents;
- Information we receive in the course of establishing a customer relationship including, but not limited to, applications, forms, and questionnaires;
- Information about your transactions with us or others

### Information About You That Paradiem Shares

Paradiem works to provide products and services that benefit our customers. We may share non-public personal information with non-affiliated third parties (such as brokers and custodians) as necessary for us to provide agreed services and products to you consistent with applicable law. We may also disclose non-public personal information to other financial institutions with whom we have joint business arrangements for proper business purposes in connection with the management or servicing of your account. In addition, your non-public personal information may also be disclosed to you, persons we believe to be your authorized agent or representative, regulators in order to satisfy Paradiem's regulatory obligations, and is otherwise required or permitted by law. Lastly, we may disclose your non-public personal information to companies we hire to help administrate our business. Companies we hire to provide services of this kind are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We limit their use of your

personal information to the performance of the specific service we have requested.

**To repeat, we do not sell your non-public personal information to anyone.**

#### **Information About Former Clients**

Paradiem 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.

#### **Confidentiality and Security**

Our employees are advised about the firm's need to respect the confidentiality of our customers' non-public personal information. Additionally, we maintain physical, procedural and electronic safeguards in an effort to protect the information from access by unauthorized parties.

#### **We'll Keep You Informed**

We will send you notice of our privacy policy annually for as long as you maintain an ongoing relationship with us. Periodically we may revise our privacy 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. You may obtain a copy of our current privacy policy by contacting us at (985) 727-0770.