PARADIGM CONSULTING, INC.

FIRM INTRODUCTION

Paradigm Consulting, Inc. ("Paradigm") is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage and investment advisory services and fees differ and it is important for you to understand these differences. For more information, free and simple tools are available to research firms and financial professionals at **Investor.gov/CRS**, which also provides educational materials about broker-dealers, investment advisers, and investing.

WHAT INVESTMENT SERVICES AND ADVICE CAN YOU PROVIDE ME?

We offer **discretionary** and **non-discretionary** investment advisory services to individuals and their families to include high net worth individuals, trusts, charitable organizations, and corporations. You may elect to enroll in an investment management program where you will pay an ongoing asset-based fee for our investment advisory services. As part of these services, we will offer you advice on a regular basis, discuss your investment and overall financial goals, design a strategy to help achieve those goals, and regularly monitory your account. Unless expressly requested by you, Paradigm will manage your account on a **discretionary** basis and will make changes to the allocation as deemed appropriate by Paradigm. By granting **discretionary** authority to Paradigm, you are authorizing Paradigm to purchase and sell transactions within your investment management account as deemed appropriate by Paradigm without your prior authorization. We offer **non-discretionary** investment advisory services to pension and profit sharing plans. **Non-discretionary** investment advisory services means that all suggested changes to your account will be discussed with you prior to implementation and only upon your expressed authorization will they be implemented.

You should carefully consider which types of accounts and services are right for you. All of our services are designed to take into account your investment objectives, your risk tolerance, your time horizon, and other financial decisions important to you.

CONVERSATION STARTERS. Ask your financial professional:

- Given my financial situation, should I choose an investment advisory service? Why or why not?
- How will you choose investments to recommend to me?
- What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?

For Additional Information on our services please see our ADV Part 2A Brochure, Items 4 and 13.

WHAT FEES WILL I PAY?

For Advisor Managed Portfolios ("Non-Wrap Accounts") you will pay a quarterly account fee for advisory services, as well as separate per-trade transaction charges. In addition, we offer Model Program Accounts ("Wrap Accounts") where no separate transaction charges apply and a single quarterly fee is paid for all advisory services and transactions. These account management fees (asset-based fees) are calculated on a quarterly basis based upon the market value of the assets under management held in your account and paid in advance. The more assets there are in your advisory account, the more you will pay in fees, and we may therefore have an incentive to encourage you to increase the assets in your account. The amount paid to your financial professional does not vary based on the type of investments we select on your behalf or recommend to you. The asset-based fee reduces the value of your account and will be deducted from your account. Our Retirement Plan Consulting Services Fees may be billed quarterly or monthly (in arrears or in advance) and are calculated on a quarterly basis based upon the market value of the plan assets under management. In special circumstances other fee paying arrangements may be negotiated. The above referenced terms will be disclosed in your account application paperwork.

Additional fees and expenses may apply for Mutual Funds, Securities Transactions, IRAs and Qualified Retirement Plan accounts. These fees include maintenance and termination fees. Specific account fees are disclosed in the account application paperwork provided to you in association with these accounts.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

CONVERSATION STARTER. Ask your financial professional:

• Help me understand how these fees and costs might affect my investments? If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

For Additional Information on specific fees and how fees are calculated, refer to Item 5 in our ADV Part 2A Brochure and your account application paperwork.

WHAT ARE YOUR LEGAL OBLIGATIONS TO ME WHEN ACTING AS MY INVESTMENT ADVISER?

HOW ELSE DOES YOUR FIRM MAKE MONEY AND WHAT CONFLICTS OF INTERESTS DO YOU HAVE?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are examples to help you understand what this means:

Separate from their role of providing asset-based investment advisory services, our financial professionals may sell you securities products and other investment products through a brokerage account in their capacity as Registered Representatives of Royal Alliance, separate from your investment management account. Additional compensation may be received in connection with such sales activity. In addition, our financial professionals are licensed with various insurance companies. Commissions will be earned if the insurance products are purchased through them. As such, sales are reviewed for suitability by an appointed supervisor.

In instances where we recommend that a Third-Party Investment Adviser manage your assets, please refer to the Third-Party's ADV Part 2A Brochure and associated disclosure documents for details on compensation.

CONVERSATION STARTER. Ask your financial professional:

How might your conflicts of interest affect me, and how will you address them?

For Additional Information about our conflicts please see our ADV Part 2A Brochure, Items 5, 10 and 14.

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals are compensated through the investment advisory service fees described on page 1 of this Relationship Summary. In addition to providing advisory services, our financial professionals receive commissions for any investment products they may sell to you in a brokerage account, separate from your investment management account, in their capacity as Registered Representatives of Royal Alliance. In this role, financial professionals receive additional compensation in connection with such activity, and the level of compensation depends on the type of product purchased. To eliminate potential conflict, Paradigm does not use a performance-based fee structure.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No, the firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

CONVERSATION STARTER. Ask your financial professional:

• As a financial professional, do you have any disciplinary history? For what type of conduct?

For Additional Information please see our ADV Part 2A Brochure, Item 9. To find out more about us and our financial professionals, visit **Investor.gov/CRS** or **Brokercheck.finra.org**.

ADDITIONAL INFORMATION

For additional and up-to-date information about our services, or to request a copy of this Relationship Summary, please contact our firm at (315) 797-8400, or visit our website at www.paradigmci.com.

CONVERSATION STARTER. Ask your financial professional:

• Who is my primary contact person? Is he or she a representative of an investment-advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?