

FORM ADV PART 2A

PARAGON RETIREMENT PLANNING, INC.

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This brochure provides information about the qualifications and business practices of Paragon Retirement Planning, Inc. If you have any question about the contents of this brochure, please contact Daniel Stavale at (248) 457-4570. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Paragon Retirement Planning, Inc. is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Paragon Retirement Planning, Inc. is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number known as a CRD number. Paragon's CRD number is 284630.

2. MATERIAL CHANGES

This is an Annual Update, Paragon has the following material changes to report since the last brochure filing on March 20, 2024.

- We have no material changes to report.

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4. ADVISORY BUSINESS

A. OWNERSHIP/ADVISORY HISTORY

Paragon Retirement Planning, Inc. (“Paragon”) was founded in 2016 by Daniel Stavale. Mr. Stavale is the sole shareholder, investment adviser representative and Chief Compliance Officer. Additional information about Mr. Stavale can be found under Item 19 along with his ADV Part 2B.

B. ADVISORY SERVICES OFFERED

Paragon’s services include financial planning and the recommendation of unaffiliated third-party investment advisers. Paragon meets with a client to evaluate their individual investment needs, goals and objectives. After the evaluation, Paragon may recommend one or more of the services described below.

i. FINANCIAL PLANNING

Paragon offers comprehensive financial planning along with single issue financial consulting services. Our comprehensive financial planning service includes evaluating the client’s financial situations, goals, risk tolerance, and investment time horizon. Through a series of personal interviews and the use of questionnaires, Paragon collects pertinent data and identifies goals, objectives, financial problems, and potential solutions. Paragon will prepare and present specific recommendations and implement those recommendations, as agreed upon with the client. Depending on the client’s situation, the written plan may include any of the following topics: financial and cash management, risk management using insurance, net worth planning, investment planning, estate planning, tax issues, retirement planning, educational funding, goal setting, or other needs as identified by the client and us. The topics are tailored to the needs of the client. After the comprehensive financial planning service, Paragon presents the client with a written financial plan.

Paragon’s financial consulting services are provided when a client needs assistance with one or two financial topics. This service generally does not involve creating a written financial plan. Typically, Paragon meets with the client to discuss his or her questions, conduct research and present our findings at a second meeting.

ii. RECOMMENDATION OF THIRD-PARTY INVESTMENT ADVISERS

Paragon offers discretionary portfolio management services to its advisory clients. Paragon engages a sub-advisor (the “Sub-Advisor”) to provide portfolio management services to its clients. A Sub-Advisor is an unaffiliated registered investment advisor who specializes in portfolio management and offers a number of model portfolio strategies. Paragon allocates its client’s assets among the strategies offered by the Sub-Advisor. Paragon has discretion to allocate the client’s money and to hire or terminate the sub-advisor in its sole discretion. The Sub-Advisor agrees to maintain the strategic portfolio models described in the Sub-Advisory Agreement between Paragon and the Sub-Advisor. Paragon is not responsible for executing trades. Paragon solely responsible for maintaining the client relationship and monitoring any changes in the client’s investment objectives, risk tolerance, investment goals and time horizon. Paragon is responsible for providing its clients a copy of the Sub-Advisor’s Form ADV Part 2A.

Paragon does not provide direct portfolio management services to its clients. All portfolio management services are performed by a Sub-Advisor as described in the above paragraph.

In the performance of the services it provides to clients, Paragon is not required to verify any information received from a client's other professionals, such as accountants or attorneys. Each client is advised that it remains their sole responsibility to promptly notify Paragon when there is a change in their financial situation, goals or investment objectives which may prompt a review and an evaluation of a previous recommendation or course of action.

In a limited number of instances, Paragon may recommend the services of an unaffiliated third-party investment adviser ("Third-Party Adviser") to manage client assets. The recommendation of a Third-Party Adviser depends on the client's specific circumstances. Paragon works with each client to determine when a Third-Party Adviser may be appropriate. When Paragon recommends a Third-Party Adviser, it remains responsible for the client relationship by the ongoing monitoring of the Third-Party Adviser. Questions regarding the Third-Party Adviser's services and portfolio performance will be directed to Paragon. Paragon currently maintains relationships with the following Third-Party Advisers:

Asset Mark, Inc. – CRD #109018

Caitlin John Private Wealth Management, LLC – CRD #154494

Financial & Tax Architects, Inc. – CRD #119169

Symmetry Partners, LLC – CRD #120982

Additional information about these investment advisers is available on the SEC's website at www.adviserinfo.sec.gov. Clients can search this site by a unique identifying number, known as a CRD number.

C. TAILORED SERVICES

Paragon tailors its services to meet the client's needs, goals and risk tolerance. Clients may impose restrictions on investment in certain securities or types of securities. All restrictions must be mutually agreed upon in writing.

D. WRAP PROGRAM

Paragon do not sponsor a wrap program.

E. CLIENT ASSETS MANAGED

As of January 16, 2025, Paragon has assets under management of \$50,000,000.

5. FEES AND COMPENSATION

A. FINANCIAL PLANNING SERVICES

Paragon's provides financial planning services on either an hourly or fixed fee basis in accordance with the following fee schedule.

Financial Consulting Services: Paragon’s hourly rate is \$200 for financial consulting services. The topics and the approximate number of hours may vary depending upon the agreed upon parameters of the services provided. Consulting services does not involve creating a written financial plan but rather providing financial advice on a single topic. An estimate of the total time will be agreed upon in the written agreement. The hourly fee is negotiable.

- **Comprehensive Written Financial Plan Services:** Paragon provides a comprehensive financial plan for a fixed fee. The written plan covers all topics disclosed in the financial planning agreement. The fee ranges from \$300 to \$5,000. The fee depends on the number of topics covered in the written financial plan. The fee is negotiable. Paragon requires a down payment of 50% of the estimated fee for both services.

The client may terminate the financial planning agreement for any reason during the five business days following the date the agreement was signed and will receive a refund of 100% of all fees paid without cost or penalty. Subsequent to the initial five-day termination period, the client may terminate the agreement by providing seven days written notice to Paragon Retirement Planning, Inc., 200 East Big Beaver, Troy, MI 48083. Paragon will provide the client with the information completed to date along with a refund of any fees based on the amount of work completed.

B. RECOMMENDATION OF INVESTMENT ADVISERS

Paragon offers discretionary portfolio management services to its advisory clients. The fees for this service are based on a percentage of the assets under management.

Paragon’s management fee schedule is as follows:

Assets Under Management	Paragon’s Fee*	Total Fee**
All Asset Levels	0.25% to 1.2%	0.25% to 1.2%

**Fees may be negotiable under certain circumstances, including the length of client relationship, the number of family members association with the client, among other factors.*

*** This includes Paragon’s fee only, it does not include fees charged by a sub-advisor or third-party asset manager. Combined fees are shown below.*

Paragon engages a sub-advisory or third-party investment advisor to provide ongoing portfolio management services to its clients. Paragon engages Financial & Tax Architects, Inc. (“FTA”) and Asset Mark for sub-advisory services.

FTA and Asset Mark charge a sub-advisory fee which is paid by the client. The fee schedules are as follows:

Paragon Fee	FTA’s Fee	Total Fee
0.25% to 1.2%	.75%	1.00% to 1.95%

Paragon Fee	Asset Mark’s Fee	Total Fee
0.25% to 1.2%	.25% to .50%	0.50% to 1.70%

Sub-advisors use a wide variety of financial vehicles and products, including, but not limited to, domestic and foreign equities, corporate bonds, municipal bonds, Treasury securities, mutual funds and ETF's. The Sub-Advisor charges a portfolio management fee based on the amount of assets under management for each Paragon client.

The Sub-Advisor's portfolio management fee is separate from and in addition to the portfolio management fees paid to Paragon.

When Paragon acts as a solicitor for the Third-Party Adviser, Paragon does not charge a separate fee from the fee charged by the Third-Party Adviser for its services. Instead, Paragon enters into an agreement with the Third-Party Adviser to share in a portion of the Third-Party Adviser's management fee charged to the client. Paragon's portion may be up to 50% of the Third-Party Adviser's management fee. The exact amount is disclosed in the Third-Party Adviser's Solicitor Disclosure Document. Additionally, when the management fee is withdrawn (quarterly or monthly, in advance or in arrears) will vary with each Third-Party Adviser. These details will be disclosed in the Third-Party Adviser's ADV Part 2A and the Third-Party Adviser's Solicitor Disclosure Document; both documents will be given to the client upon solicitation.

A client may terminate either service for any reason at any time and, within the first five (5) business days after signing the contract, without any cost or penalty for full refund. Thereafter, an agreement may be terminated at any time by providing seven (7) days' written notice to Paragon Retirement Planning, Inc., 200 East Big Beaver, Troy, MI 48083. Upon termination, fees will be prorated for the number of days that services were rendered during the termination billing period. All unearned prepaid fees will be refunded to the client. Refunds are paid by depositing the fee back into the account if allowed by the client's custodian. In all other cases refunds are paid by check.

6. PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

Paragon do not charge performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or engage in any side-by-side management.

7. TYPES OF CLIENTS

Paragon's services are offered to individuals and high net worth individuals. Paragon generally require a minimum account size of \$100,000. The account minimum requirement may be waived in certain instances.

8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

Paragon's investment strategy is based on implementing a suitable asset allocation. Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a

portfolio's assets per an individual's goals, risk tolerance and investment horizon among various asset classes. The asset classes typically include equities, fixed-income, and cash and equivalents. Each class has different levels of risk and return, so each will behave differently over time.

When deciding on the asset allocation for a client's account, Paragon studies various market indicators such as financial newspapers and magazines, research prepared by other advisers, company press releases, prospectuses, and other market related filings.

B. RECOMMENDED SECURITIES AND INVESTMENT RISKS

All investments bear different types and degrees of risk, **investing in securities involves risk of loss that clients should be prepared to bear, including a complete loss of principal investment.** Sub-Advisors and Third-Party Advisers use various investment strategies designed to provide appropriate investment diversification. Some investments have significantly greater risk than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. It is the responsibility of the client to ask questions about risks they do not understand. Paragon is pleased to review any client questions or concerns.

Paragon strives to render our best judgment on behalf of our clients. Still, Paragon cannot assure or guarantee clients that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment adviser but is not a reliable predictor of future performance. Paragon continuously strives to provide outstanding long-term investment performance, but many economic and market variables beyond our control can affect the performance of an investment portfolio.

An investment could lose money over short or even long periods. A client should expect his or her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. A client's account performance could be hurt by any of the following:

- *Principal Risk:* There is no guarantee that a stock will go up in value. A stock's price fluctuates,
which means a client could lose money by investing in an equity security.
- *Stock Market Risk:* The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- *Interest Rate Risk:* Interest rate risk is the chance that an unexpected change in interest rates will negatively affect the value of an investment, such as the reduction in the value of a security, especially a bond, resulting from a rise in interest rates.
- *Mutual Fund Manager Risk:* The chance that the proportions allocated to various mutual funds will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- *International Investing Risk:* Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition,

foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.

- *Investment Style Risk*: Different investment styles tend to shift in and out of favor, depending on market conditions and investor sentiment. Growth stocks tend to be more volatile than value stocks and their prices usually fluctuate more dramatically than the overall stock market. A stock with growth characteristics can have sharp price declines due to decreases in current or expected earnings and may lack dividends that can help cushion its share price in a declining market.
- *Terrorism Risk*: The chance that stock domestic and international stock prices will decline due to a terrorist event.
- *Political Risk*: The chance that a change in government may affect stock prices of domestic or international stocks.
- *Natural Risks*: The chance that a natural catastrophe (earthquake, hurricane, etc.) may affect stock prices of domestic or international stocks.
- *Liquidity Risk*: Liquidity risk exists when certain investments are difficult to purchase or sell, possibly preventing the ability to sell these illiquid securities at an advantageous time or price, or possibly requiring the client to dispose of other investments at unfavorable times or prices to satisfy its obligations.

9. DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. These include the following:

- A. A criminal or civil action in a domestic, foreign or military court of a competent jurisdiction in which the *supervised person*
 1. was convicted of, or pled guilty or nolo contendere (“no contest”) to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses;
 2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses;
 3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or
 4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the *supervised person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.

Paragon has no information applicable to this item.

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which the *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority
 - i. denying, suspending, or revoking the authorization of the *supervised person* to act in an *investment-related* business;
 - ii. barring or suspending the *supervised person's* association with an *investment-related* business;
 - iii. otherwise significantly limiting the *supervised person's investment-related* activities; or
 - iv. imposing a civil money penalty of more than \$2,500 on the *supervised person*.

Paragon has no information applicable to this item.

C. A *self-regulatory organization (SRO)* *proceeding* in which the *supervised person*

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of the *SRO's* rules and was: (i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from *investment-related* activities; or (iii) fined more than \$2,500.

Paragon has no information applicable to this item.

D. Any other *proceeding* in which a professional attainment, designation, or license of the *supervised person* was revoked or suspended because of a violation of rules relating to professional conduct. If the *supervised person* resigned (or otherwise relinquished his attainment, designation, or license) in anticipation of such a *proceeding* (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

Paragon has no information applicable to this item.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. BROKER-DEALER AFFILIATIONS

Paragon is not affiliated with a broker-dealer.

B. FUTURES/COMMODITIES FIRM AFFILIATION

Paragon is not affiliated with a futures or commodities broker.

C. OTHER INDUSTRY AFFILIATIONS

Paragon's owner, Mr. Stavale, is also an independent insurance agent and sells various insurance products including fixed annuities through various companies. Mr. Stavale may recommend these services to our clients. These services pay him commissions that are separate from the investment adviser fees outlined in Item 5 above. This creates a financial incentive to recommend these services. However, Mr. Stavale attempts to mitigate any conflicts of interest to the best of his ability by placing the client's interests ahead of his own and through the implementation of policies and procedures that address the conflict. Additionally, a client is never obligated to purchase recommend insurance products through Mr. Stavale.

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTION AND PERSONAL TRADING

A. DESCRIPTION

Paragon's Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. Paragon will provide a copy of its Code of Ethics to any client or prospective client upon request.

The Code of Ethics covers all supervised persons and it describes the high standard of business conduct and fiduciary duty we have to our clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition of insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons must acknowledge the terms of the Code of Ethics annually, or as amended.

B. MATERIAL INTEREST IN SECURITIES

Paragon does not have a material interest in any securities.

C. INVESTING IN OR RECOMMENDING THE SAME SECURITIES

Paragon's owner, Mr. Stavale, may use the same unaffiliated portfolio manager that he recommends to clients. This does not create a conflict of interest since Mr. Stavale has no input into the manager's trading activities. Therefore, Mr. Stavale cannot trade ahead of any client accounts because he has no control over when accounts are traded. Still, his personal securities accounts are reviewed and made available to regulators for their review.

12. BROKERAGE PRACTICES

A. RECOMMENDATION CRITERIA

Paragon does not recommend broker-dealers or custodians. Paragon does not trace client accounts. The sub-advisor or third-party adviser trade all client accounts. Paragon does not participate in any soft dollar arrangements. Paragon does not receive client referrals from and broker-dealer. Paragon

does not participate in any client directed brokerage arrangements.

TRADE AGGREGATION

Paragon does not trade client accounts.

13. REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

Daniel Stavale reviews the general holdings of client accounts on a quarterly basis. He also attempts to meet with each client in person or by telephone annually.

B. OTHER REVIEWS

Reviews may be triggered by events within clients' lives, as well as pertinent news events, changes in federal and state regulatory or tax regimes, and overall economic events.

C. REPORTS

Comprehensive financial planning clients receive a written financial plan after the financial planning process is complete.

14. CLIENT REFERRALS AND OTHER COMPENSATION

A. OTHER COMPENSATION

Paragon does not receive extra compensation or any other economic benefit for providing investment advice or other advisory services to clients.

B. CLIENT REFERRALS

Paragon does not pay for client referrals or use solicitors.

15. CUSTODY

All client funds, securities and accounts are held at a qualified custodian. Paragon does not take possession of a client's funds, securities or accounts. The qualified custodian will send a quarterly account statement to the client. Paragon urges its clients to carefully review their statements and notify us of any discrepancies as soon as possible.

16. INVESTMENT DISCRETION

Paragon is a discretionary manager. It has discretion to select the sub-advisor and the appropriate mix of portfolio strategies offered by the sub-advisor. This blend of portfolio strategies becomes the client's asset allocation. Paragon may change this allocation at any time.

17. PROXY VOTING OF CLIENT SECURITIES

Paragon does not proxy vote for the securities held in client accounts. Proxy solicitation materials will be forwarded to clients for response and voting by the account custodian. In the event a client has a question about a proxy solicitation, the client may contact us.

18. FINANCIAL INFORMATION

A. BALANCE SHEET

Paragon does not require or solicit prepayment of more than \$500 in fees per client, six months or more in advance.

B. FINANCIAL CONDITION

Registered investment advisers are required in this Item to provide clients with certain financial information or disclosures about our financial condition. Paragon do not have a financial commitment that impairs our ability to service our clients.

C. BANKRUPTCY

Neither Paragon nor any of its principal officers have not been the subject to bankruptcy proceedings.

19. REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Paragon has one principal executive officer (management person), Daniel Stavale (“Mr. Stavale”). Mr. Stavale’s biographical information is provided in the attached Brochure Supplement document.

Paragon is required to disclose additional information if Mr. Stavale has other business activities. As disclosed in Item 10.C, above, Mr. Stavale owns a college planning business and is an independent insurance agent. Please see Item 10.C for additional details about these other business activities.

Paragon is also required to disclose if Mr. Stavale receives performance-based fees, has any relationship or arrangement with an issuer of securities, or if he was ever found liable in an arbitration, civil, self-regulatory organization or administrative proceeding. As none of these apply to Mr. Stavale; he has no information to provide on these topics.