

### Form ADV Part 3: Relationship Summary for Paladin Advisors, LLC

Paladin Advisors is registered with the SEC as an investment adviser (RIA). Brokerage and investment advisory services and fees differ, and it is important for *retail investors* to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

#### What Investment Services and Advice Can You Provide Me?

**Description of Services:** We offer investment advisory services to *retail investors*, including investment strategy development, investment management, research services, consulting on special projects, as well as financial, estate & tax-planning services.

- I. *Monitoring:* We monitor *retail investors'* investments on weekly and monthly intervals, reviewing allocations, performance, and risk. If needed, we'll review more frequently. A material limitation of our monitoring is that we may not become aware of an issue in real time. All monitoring is included as part of our standard services.
- II. *Investment Authority:* If the *retail investor* agrees, we have discretion (i.e., over the type and amount of securities to be bought and sold) on their behalf. We will agree with you on this authority beforehand, and formalize it with a mutual signing of our Investment Policy Statement which is reviewed annually. We do not have authority to deduct funds or securities from your accounts, except for the payment of advisory fees. Clients with non-discretionary relationships make decisions on the purchase and sale of investments.
- III. *Limited Investment Offerings:* We do not restrict our investment vehicle selections or recommendations to a set of proprietary products or limited menu of choices. As a policy, we avoid all investments that offer financial compensation to us for the recommendations we make for you. Most of our investment vehicles are mutual funds and ETFs; we generally avoid "alternative assets", such as hedge funds and private equity.
- IV. *Account Minimums and Other Requirements:* We do not have a minimum account/portfolio size, but do have minimum annual fees of \$1,000 per year for our streamlined investment management services and \$10,000 per year for our full-service clients.

Additional Information: Additional details may be found in our Form ADV, Part 2A (<https://paladinadvisors.com/about/>), for our service offerings ([Item 4](#)), types of clients we serve and the respective service models ([Item 7](#)), and our investment offerings ([Item 8](#)).

#### Conversation Starters:

- *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?*

#### What Fees Will I Pay?

We charge our streamlined investment management services model a flat annual fee of 0.5% of AUM, while our full-service clients are charged on a tiered format: 1% on the first \$2.5M, 0.8% for the next \$2.5M, 0.6% for the next \$5M, and 0.4% beyond that. The AUM figures are quarter-end portfolio values; fees are charged quarterly in arrears shortly thereafter. We offer an hourly rate of \$250 or agreed project fees for stand-alone financial plans or consulting on special projects. Details on ad hoc service fees may be found [here](#). A potential conflict of interest with the AUM-based fee approach is the more assets there are in a retail account, the more a retail investor may pay in fees. Therefore, Paladin could be incentivized to encourage you to increase the assets in your accounts or possibly take more risk in portfolios, to increase the assets we manage.

Your investment portfolio may also incur transaction and management fees from the custodian and investment fund companies that we select. 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. More details on the fees Paladin charges are located [here](#).

**Conversation Starter:** *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?*

**What are Your Legal Obligations to Me When Acting as My Investment Advisor?  
How Else Does Your Firm Make Money and What Conflicts of Interest 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 some examples to help you understand what this means. Paladin conducts IRA rollovers from 401(k) plans for our clients. It will benefit Paladin to recommend a rollover or increase the assets managed by Paladin which constitutes a conflict of interest, as the more assets we manage, the more you will pay Paladin in advisory fees. We mitigate this conflict by discussing all of your options to help you determine the most appropriate choice for you.

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

For more detailed information regarding conflicts of interest, please see our [ADV Part 2A Client Brochure](#).

**How Do Your Financial Professionals Make Money?**

All employees of our firm are compensated through a base salary with the possibility for quarterly and annual bonuses. Bonuses are awarded based on the firm's and the individual's performance—not the performance of your portfolio. Non-cash compensation includes a 401k company match, paid vacation days, and continuing education reimbursement. Advisors who are Partners (owners) of the firm receive distributions based on firm profitability. Partners may be incentivized to recommend that clients assume a higher risk profile in their portfolios, given the potential for increased compensation.

**Do You or Your Financial Professionals Have Legal or Disciplinary History?**

No. Please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

**Conversation Starter:** *As a financial professional, do you have any disciplinary history? For what type of conduct?*

**Additional Information**

A retail investor can find additional information about our investment advisory services on our website, [here](#), in our [ADV Part 2A Client Brochure](#), or on the IAPD [website](#). You can request a copy of the *relationship summary* or up-to-date information by reaching to our CCO by email ([info@paladinadvisors.com](mailto:info@paladinadvisors.com)) or phone (617-202-9653).

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