

Customer Relationship Summary

9200 Indian Creek Pkwy., Suite 600
Overland Park, KS 66210
(913) 451-2254 | www.paragoncap.com



Item 1 - Introduction

Paragon Capital Management, LLC (CRD No. 108168) is registered with the Securities and Exchange Commission as an investment adviser. Advisory services and fees are different from brokerage services and fees. It is important to understand the difference and carefully consider which account type and the services that are right for you. This document provides a summary of the types of services provided by Paragon Capital Management, LLC and the associated fees. In addition, free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS, which provides educational materials about broker/dealers, investment advisers, and investing.

Item 2 - Relationships & Services

What investment services and advice can you provide me?

Paragon Capital Management, LLC strives to meet with clients (in-person, phone, video), no less than annually, to provide investment advice, develop strategies and define goals as well as regularly monitor investments as part of our standard asset management services. Asset management focuses on investment goals, objectives, risk tolerance consistent with a client's financial situation. Investment portfolios consist primarily of individual stocks, exchange traded funds, mutual funds, US government, municipal, or corporate bonds, preferred stock, structured notes, and money market funds. Paragon may invest client accounts in other types of securities based on the client's goals and risk tolerance. Assets are managed on a discretionary basis. Discretionary authority allows Paragon Capital Management, LLC to buy and sell securities without asking in advance and without material limitations whereas non-discretionary authority would be limited to offering advice, but you would make the decision to buy or sell. Paragon Capital Management, LLC receives compensation by charging a quarterly on-going asset management fees. Advisory services are not limited to proprietary products or a limited menu of products. A minimum investment amount is generally \$500,000 however, smaller accounts may be accepted based on several factors including the client relationship.

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?

Item 3 - Fees, Costs, Conflicts and Standard of Conduct

What Fees will I Pay?

Fees and costs affect the value of your account over time. Paragon Capital Management, LLC charges a management fee based on a percentage of assets under management. The asset-based fee reduces the value of your account and will be deducted from your account quarterly. 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. Additional information about the fees charged can be found on Item 5 of our Form ADV Part 2A ("Firm Brochure"). Paragon Capital Management, LLC has a fiduciary duty to manage an account in a cost-effective manner and considers custodian fees, account maintenance fees, fees related to mutual funds (12b-1 fees) and other transactional fees (ticket charges) and product-level fees when making investment recommendations. 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, the more assets we manage the more fees we generate, different account types provide different compensation.

We pay referral fees to Schwab and to wealth managers. This fee is paid to encourage the management of new accounts and retention of accounts.

You could also open a brokerage account with a broker/dealer, where you pay a transaction-based fee, generally referred to as a commission, when the broker/dealer buys or sells an investment for you.

What are your legal obligations to me when acting as my investment adviser?

As an investment adviser, we always have a fiduciary duty to act in your best interest.

How else does your firm make money and what conflicts of interest do you have?

Paragon Capital Management, LLC does not offer proprietary products, receive payments from third parties for investment advice, participate in a revenue sharing agreement or conduct principal trading. Our financial professionals are compensated with salary for servicing accounts and possible bonus compensation for generating new clients. The more assets you have in an advisory account, the more you will pay us. We therefore have an incentive to grow the assets in your account to increase our advisory fees. Additional information about conflicts of interest is available in our ADV 2A.

How do your financial professionals make money?

Financial Professionals are compensated based on a percentage of assets under management. The percentage charged is based on the scope and complexity of your account, the amount of time and expertise required as well as the account value.

Conversation Starters: “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?” “How might your conflicts of interest affect me, and how will you address them?”

Item 4 - Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No, Paragon Capital Management, LLC does not have any disciplinary history to disclose; however, we encourage you to visit www.investor.gov for a free and simple search tool to research our firm and our financial professionals. To report a problem to the SEC, visit www.investor.gov or call the SEC’s toll-free investor assistance line at (800) 732-0330.

Conversation Starters: “As a financial professional, do you have any disciplinary history?” “For what type of conduct?”

Item 5 - Additional Information

You can also access free and simple tools to help you research firms and financial professionals at www.investor.gov/CRS, which provides educational materials about broker/dealers, investment advisers, and investing. Consequently, the broker/dealer has an incentive to encourage you to trade often. You can receive investment advice in either type of account, depending on the fee structure you prefer. To request a copy of the Customer Relationship Summary, please contact us at (913) 451-2254.

Conversation Starters: “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?”