

Registered As: Paragon Capital Management, LLC | Doing Business as: Paragon Capital Management, LLC

**PARAGON** CAPITAL MANAGEMENT, LLC

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## **Nily Levy**

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**March 31, 2021**

This brochure supplement provides information about Nily Levy that supplements the firm disclosure brochure. You should have received a copy of the firm brochure that describes the investment advisory services offered through Paragon Capital Management, LLC, a registered investment advisor. Please contact the Paragon Capital Management, LLC at the telephone number above if you did not receive their brochure or if you have any questions about the contents of this supplement. Additional information about your Investment Advisor Representative is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**Item 2 - Educational Background and Business Experience**

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This section of the brochure supplement includes the Investment Advisor Representative's name, year of birth, formal education after high school, and business background for at least the preceding five years.

Nily Levy

Year of birth: 1953

**Education**

The following information details your Investment Advisor Representative's formal education. If a degree was attained, the type of the degree will be listed next to the name of the institution. If a degree is not listed, the Investment Advisor Representative attended the institution but did not obtain a degree.

Golden Gate University, Bachelor of Science in Finance  
Graduated 1992

**Business Experience**

The following information details your Investment Advisor Representative's business experience for at least the past 5 years.

Paragon Capital Management, LLC, DBA Paragon Capital Management, LLC-Wealth Manager,  
01/2021-Present

Charles Schwab & Co., Inc., Vice President, Financial Consultant, 6/2005-3/2019

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**Item 3 - Disciplinary Information**

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This section includes any legal or disciplinary events material to a client's or prospective client's evaluation of an Investment Advisor Representative.

There are no legal or disciplinary events required to be disclosed in response to this item. Any such disciplinary information would be available at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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**Item 4 - Other Business Activities**

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This section includes any relationship between the advisory business and the Investment Advisor Representative's other financial industry activities that creates a material conflict of interest with clients and describes the nature of the conflict and generally how it is addressed. If the Investment Advisor Representative is actively engaged in any investment-related business or occupation, including if they are registered, or have an application pending to register, as a broker/dealer, Registered Representative of a broker/dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, the business relationship, if any, between the advisory business and the other business is disclosed below.

There are no Other Business Activities required to be disclosed in response to this item.

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**Item 5 - Additional Compensation**

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This section includes details regarding if someone who is not a client provides an economic benefit to the Investment Advisor Representative for providing advisory services. For purposes of this Item, economic benefits include sales awards and other prizes, but not the supervised person's regular salary, if any.

Nily Levy does not receive any additional compensation, apart from her regular salary and bonus. She is eligible for a quarterly bonus that is based, all or in part, on the number client referrals or new accounts. Nily Levy does not receive any economic benefit from anyone who is not a client for providing advisory services.

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**Item 6 – Supervision**

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This section explains how Paragon Capital Management, LLC, supervises the Investment Advisor Representative including how the advice the Investment Advisor Representative provides is monitored.

Paragon Capital Management, LLC maintains a supervisory structure and system reasonably designed to prevent violations of applicable state rules and regulations. Dorothy Boehr serves as the Chief Compliance Officer and is responsible for administering the policies and procedures and a system of technology-based controls to monitor account activity for irregularities and/or patterns that require review and potential action that may lead to disciplinary action or reimbursements. Dorothy Boehr can be reached at: (913) 451-2254.