
Cover Page - Item 1

Copper Canyon LLC
A Florida Registered Investment Advisor

Copper Canyon LLC
4700 Millenia Blvd Suite 175
Orlando, FL 32839
(407) 864-2702
www.coppercanyonllc.com

Form ADV Part 2A Brochure
January 06, 2025

Copper Canyon LLC is an investment adviser registered with the state of Florida. An "investment adviser" means any person who, for compensation, engages in the business of advising others, either directly or through publications or writings, as to the value of securities or as to the advisability of investing in, purchasing, or selling securities, or who, for compensation and as part of a regular business, issues or disperses analyses or reports concerning securities. Registration with the SEC or any state securities authority does not imply a certain level of skill or training. We may refer to ourselves as "registered investment advisors," this does not imply a certain level of skill or training.

This brochure supplement provides information about the qualifications and business practices of Copper Canyon LLC. If you have any questions about the contents of this brochure, please contact us at (407) 864-2702; or by email at: dylan@coppercanyonllc.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or any state securities authority.

Additional information about Copper Canyon LLC is also available on the SEC's website at www.adviserinfo.sec.gov. The term "Registered" does not imply a certain level of skill or training.

Material Changes - Item 2

The purpose of this page is to inform you of any material changes since the previous version of this brochure.

Change of Fee Calculation

As of 06/30/2024, we describe how we calculate fees based on the ending balance of the investment accounts at quarter end. Previously, we calculated investment management fees by the month and summing these values together. Please refer to Item 5 for more details.

Change of Minimum Account Size

As of 01/06/2025, Copper Canyon LLC has increased the account minimum size to \$200,000 from \$100,000. Please refer to Item 7 Page 12.

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This Brochure contains 36 pages and is not complete without all pages.

Advisory Business - Item 4

Item 4 Part A: General description of the firm

Copper Canyon LLC (hereinafter “Copper Canyon”, “The Firm” or “We”) is a registered investment adviser based in Orlando, Florida. We are organized as a corporation under the laws of the State of Florida. We have been providing investment advisory services since 2016. Dylan Quintilone is the principal and owner of Copper Canyon. Copper Canyon is a fee-only investment management firm. The firm does not sell annuities, insurance, stocks, bonds, limited partnerships, or other commissioned products. The firm is not affiliated with entities that sell financial products or securities. No commissions in any form are accepted. No finder’s fees are accepted.

Item 4 Part B: Types of Advisory Services

Copper Canyon provides personalized and confidential investment management for individuals. We offer advice by consulting directly with clients. This advice may include setting financial goals, managing investments, and planning for retirement. While we recommend investments, clients make the final decisions.

We act as a custodian in a limited way, which allows us to deduct fees directly from client accounts. Clients receive an itemized invoice showing the fees for our services. Fees are deducted from the account within seven days after the client receives the quarterly invoice. We also send a copy of the invoice to the qualified custodian. We follow all rules and maintain records required by the Securities and Exchange Commission (SEC) and state regulators.

With client approval, we can buy and sell investments on their behalf. This is done through a "Discretionary Trading Authorization" agreement. We evaluate each client’s financial situation at the start and periodically review their account to recommend any necessary actions. Frequent reviews may occur, but we only inform clients when immediate changes are needed. Clients can also hire other professionals, such as lawyers or accountants, directly if needed. If any conflicts of interest arise, we will disclose them to the client.

The initial consultation can be in person or virtual. It helps us determine which investment strategies might work best for the client. We gather information about their financial situation using questionnaires, conversations, and past investment history.

Our approach follows modern portfolio theory, which balances risk and returns. This method seeks to maximize returns for a given level of risk or reduce risk for a set return. We invest in liquid securities, such as individual stocks, ETFs, index ETFs, options, futures, commodities, bonds, and treasuries. Liquid securities typically have a small price difference between the buy and sell prices (a bid-ask spread), often under \$0.05. This ensures fair transaction prices for clients.

We uphold a fiduciary standard, which means we act in our clients' best interests and only invest in options that align with their financial goals.

Part B: Types of Advisory Services Continued

Portfolio Management

Copper Canyon Asset Management and Financial Planning Services

Clients may opt for Copper Canyon to manage their assets, receiving ongoing portfolio management tailored to their financial needs. The terms and fees for these services are outlined in a Portfolio Management Agreement, which is provided in writing before the relationship begins. This agreement specifies the contract term, investment fees, fiduciary obligations, client rights, tailored management strategies, discretionary trading authority, arbitration provisions, and a non-assignment clause.

Portfolio Management Approach

Copper Canyon works with clients to set realistic, measurable goals and develop strategies to achieve them. As financial objectives evolve over time, the firm provides ongoing recommendations and implements necessary adjustments.

The firm's investment philosophy emphasizes the importance of asset allocation as a key driver of portfolio performance. Investments typically include individual equities, index ETFs, equity options, and index options. Additional assets may comprise corporate bonds, certificates of deposit, municipal securities, and U.S. government securities. Copper Canyon aims to diversify investments to help reduce losses during market downturns by balancing fixed-income and equity holdings.

To manage portfolio risk, the firm may use equity or index options, such as hedging strategies that involve purchasing contracts inversely related to portfolio allocations. Techniques like covered calls, cash-secured puts, and option spreads may be employed to achieve specific investment outcomes. Alternative strategies, including buying and selling put options or spreads, may also be utilized to generate income. These strategies are carefully evaluated for suitability and implemented only with client agreement.

For further details on these strategies and associated risks, please refer to ****Item 8: Methods of Analysis, Investment Strategies, and Risk of Loss****. Copper Canyon reserves the right to apply other portfolio strategies as deemed appropriate for individual client needs.

Financial Planning Services

Since April 22, 2021, Copper Canyon has offered financial planning services, including budget planning and comprehensive financial advice. Clients enrolled in portfolio management services receive financial planning at no additional charge. For those not enrolled, services are available at an hourly rate of approximately \$200.

Financial planning services assess income, expenses, and financial goals, creating a personalized roadmap for clients to achieve their objectives. For retirement planning, Copper Canyon provides detailed projections, including 401(k) drawdowns, investment income estimates, and other factors to help clients evaluate their financial longevity. Every plan is tailored to the client's unique circumstances, offering actionable strategies to meet life goals.

Financial Consultation

For general financial consulting engagements, Copper Canyon offers a more informal process compared to comprehensive financial planning services. As such, clients typically do not receive a written summary of their financial situation or specific recommendations. Implementation of any guidance provided remains solely at the client's discretion.

The consultation fee is approximately \$50 per hour. Payment for services is due within 30 days of completing the agreed-upon consulting and advisement outlined in the Financial Planning and Consulting Agreement

After each consultation, Copper Canyon will provide the client with a detailed invoice. This invoice will include:

- The total amount due,
- An itemized breakdown of the fee calculation, and
- The time period covered by the fee.

Fees are charged in arrears, ensuring clients only pay for services rendered.

Item 4 Part C: Tailoring Services to Individual Clients

Copper Canyon customizes its advisory services to meet each client's unique needs. We evaluate the client's financial situation and provide independent recommendations aligned with their specific goals and circumstances.

Clients have the option to restrict investments in certain securities or asset classes. To do so, they must provide Copper Canyon with a written notice detailing the securities or asset classes they wish to exclude. Upon receiving this notification, Copper Canyon will promptly take the necessary steps to implement the client's instructions.

Item 4 Part D: Involvement in a Wrap Fee Program

Not applicable

Item 4

Part E: Amount of Assets Under Management

As of January 12, 2025, Copper Canyon LLC manages approximately \$4,212,700 in assets on a discretionary basis and \$385,500 in assets on a non-discretionary basis.

Fees and Compensation - Item 5

Item 5 Part A: Method of Compensation

Copper Canyon LLC's fees are structured based on a percentage of assets under management (AUM), an hourly financial planning fee, and/or a consultation fee.

Portfolio management fees are billed in arrears during the first or second week of each quarter for asset management services provided in the preceding quarter. Financial planning and consultation fees are collected upon completion of the respective services.

As of June 30th, 2024, Copper Canyon bills clients on a quarterly basis. We invoice the client on the 1st day of the month after the end of the quarter, or within 30 days of the end of the quarter.

The quarterly periods are:

- Quarter 1: January 1 to March 31
- Quarter 2: April 1 to June 30
- Quarter 3: July 1 to September 30
- Quarter 4: October 1 to December 31

Invoices are issued within 30 days of the end of the quarter. Due to the timing of investment account statements provided by the client custodian, we may not be able to provide the invoice immediately upon the quarterly period ending.

Copper Canyon LLC is a for fee advisor, which means it charges an asset under management fee (AUM) of:

Assets Under Management

Annualized Asset Based Fee Range

\$0 to \$2,000,000



1.00% (100 Basis Points)

Above \$2,000,000



0.75% (75 Basis Points)

Our percentage of asset fee may be negotiable; however, any fee beyond or below the stated range is determined by the Firm's principal.

Accounts with assets between \$0 - \$2,000,000 are charged 1% of assets under management. This fee range may be negotiable; however, any fee beyond or below the stated range is determined by the Firm's principal.

Accounts with assets greater than \$2,000,000 are charged 0.75% of assets under management. This fee range may be negotiable; however, any fee beyond or below the stated range is determined by the Firm's principal.

Portfolio Management Fees:

Clients are billed quarterly for portfolio management services. The fee is based on the investment account balance at the end of each quarter:

- March 31 for Quarter 1
- June 30 for Quarter 2
- September 30 for Quarter 3
- December 31 for Quarter 4

For example, to calculate the first-quarter fee for Client X:

- Client X's portfolio value on March 31 is \$100,000.
- The annual management fee is 1%, so the quarterly rate is 0.25%.
- Multiply 0.25% by \$100,000 to get a \$250 fee for Quarter 1.

To potentially reduce the asset-based fee, we may combine accounts for the same individual or family, or if a family member holds power of attorney for another's account. However, if the investment goals differ significantly between accounts, we may apply separate fees. All services and associated fees will be outlined in your engagement agreement.

Financial Planning Fees:

- For clients not enrolled in portfolio management services, the financial planning fee is approximately \$200 per hour.
- For clients enrolled in portfolio management, financial planning is included at no additional charge

Consultation Fee:

We charge a flat fee for consultation services, with the final fee based on the complexity and scope of the financial guidance provided. Our fees range from \$50 to \$2,500. The fee is due within 30 days of completing the consulting service, as outlined in the Financial Planning and Consulting Agreement.

After each service, Copper Canyon will send the client an invoice with the total fee and a detailed breakdown. The itemization will include the calculation method and the time period covered by the fee. Fees are charged in arrears.

Past Due Accounts and Termination of Agreement

Either the client or the investment manager may terminate the agreement by providing 2 days' written notice to the other party. Upon termination, fees will be billed on a pro rata basis for the portion of the service completed. The fee will be calculated using the portfolio value at the end of the previous billing period, adjusted for the number of days prior to termination.

Copper Canyon reserves the right to stop work on any account that is more than 60 days overdue. Additionally, Copper Canyon may terminate the agreement if a client has intentionally withheld or refused to provide essential financial information needed to offer appropriate financial advice, in Copper Canyon's judgment

Any unused fees will be refunded within 60 days.

Item 5 Part B: Collection of fees

Copper Canyon invoices clients directly for Portfolio Management Services based on a percentage of assets under management, as outlined in the fee schedule. Invoices are sent electronically or via mail. Payments are accepted through ACH transfer, personal checks, e-checks, Peer-to-Peer payments, physical cash, or Square invoicing services.

For Financial Planning or Consultation clients, invoices are also sent electronically or via mail, with the same payment methods accepted.

Copper Canyon does hold client funds under custody for the purposes of collecting portfolio management fees. At the end of the quarter, Copper Canyon invoices the client directly for any services performed. Copper Canyon provides an itemized invoice of all management fees performed directly on behalf of the client. Copper Canyon will request Interactive Brokers and/or Charles Schwab to withdraw the portfolio management fees from the client account and pay the fee invoice within 7 days of the client being sent an invoice. For clients that do not use direct fee deduction, the client has 30 calendar days from the receipt of the invoice to pay in full.

Item 5 Part C: Other Fees

As of 01/01/2025 we do not charge any other fees. However, other fees could include monthly paper statement fees, and transaction fees charged by the brokerage house for trading execution under the clients account (fees vary by client's brokerage house, please consult with your advisor for specific amounts).

Part D: Advanced Payment and Refund Policy

Copper Canyon does not collect fees more than a month in advance and will notify the client in writing if this changes. A client can obtain a refund of a prepaid fee or other services not performed by informing the advisor and firm in writing, in person and/or by telephone. If a refund is requested by phone or writing, the client is subject to identification procedures.

Part E: Sale of Securities and Other Investment Products

Not Applicable

Copper Canyon and employees do not receive compensation for the sale of securities or other investment products.

Performance-Based Fees and Side-By-Side Management - Item 6

Not Applicable

Copper Canyon does not accept performance-based fees. We are a fee-based registered investment advisor.

Types of Clients - Item 7

Copper Canyon primarily serves individuals and trusts, but also offers services to small businesses.

For Portfolio Management Services, there is a minimum account size of \$200,000. However, the firm may accept accounts below this threshold based on factors such as the client's age, income, and/or investment experience, as determined by the Firm's principal. Generally, if a prospective client expresses an intent to save and build wealth through investing, Copper Canyon may waive the minimum account requirement.

Methods of Analysis, Investment Strategies and Risk of Loss - Item 8

Item 8 Part A: Methods of Analysis

We use different portfolio management strategies based on each client's risk tolerance. Our goal is to align portfolios with a risk level that suits the client's financial needs and retirement goals. To understand a client's situation, we gather information through questionnaires, conversations, written correspondence, and their previous investment experience.

We follow Modern Portfolio Theory (MPT), which aims to balance **risk and return by constructing portfolios that minimize risk while maximizing returns. This theory suggests that it's possible to optimize returns for a given level of risk.

We focus on investing in liquid securities, such as individual stocks, ETFs, index ETFs, equity options, index options, futures, commodities, bonds, and government treasuries. We define liquid securities as those with a bid-ask spread under \$0.05 in normal market conditions, ensuring that transactions are fair and cost-effective.

Client portfolios are mainly invested in stocks, ETFs, index ETFs, equity options, and index options. We may also include corporate bonds, CDs, municipal bonds, and U.S. government securities.

Our primary strategy centers around asset allocation, which is key to a portfolio's performance. We believe that the mix of fixed income (bonds) and equity (stocks) investments drives both the return and the level of risk (or fluctuation) in the portfolio. We use research and market knowledge to design portfolios that aim to provide the best return for an acceptable level of risk.

We seek to balance investments in such a way that when one asset is going up, another may be going down, helping reduce overall portfolio risk. This is called correlation, where different asset classes behave differently. For example, stocks might rise while bonds fall.

We may use equity options or index options to manage risk or take advantage of trading opportunities. For instance, a covered call strategy involves selling call options on stocks that we already hold, potentially generating additional income. This strategy is useful when we believe the stock will remain relatively stable.

Additionally, we may use strategies like cash-secured puts, where we write a put option while holding enough cash to buy the stock at a lower price. If the stock drops, we may acquire it at a discount, though the investor must be willing to accept the price as a long-term investment.

While these strategies can help generate income, they come with risks. For example, if the stock price falls significantly, the investor must be comfortable with the possibility of owning the stock at a price lower than expected. The risk associated with these strategies may not fit all clients and therefore will only be utilized if the Firm and client determine appropriate.

For a detailed description of the risks associated with options trading, read the options disclosure document. This document is also known as the Characteristics and Risks of Standardized Options. This document at the options clearing corporation website: <https://www.theocc.com/Company-Information/Documents-and-Archives/Options-Disclosure-Document>

As the Firm deems appropriate on a case-by-case basis for the client, we reserve the right to utilize other portfolio management strategies not mentioned in this document.

We maintain fiduciary standard and only invest in securities that align appropriately with the client's financial goals. Copper Canyon cannot guarantee any level of performance or that any client will avoid a loss on account assets.

Any investment in securities involves the possibility of financial loss that Clients should be prepared to bear.

When evaluating risk, it's important to understand that each client may view financial loss differently. This depends on various factors that can affect the likelihood and size of potential losses. While the following risks are not exhaustive, they should be carefully considered by anyone thinking about using Copper Canyon's services. Clients should assess both the probability of these risks occurring and the potential impact if they do.

Item 8 Part B: Material Risks

Market Risk – The price of any security or the value of an entire asset class can decline for a variety of reasons outside of Copper Canyon's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political, demographic, or social events. If a client has a high allocation in a

particular asset class, it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period could cause that client account to underperform relative to the overall market.

Advisory Risk –There is no guarantee that Copper Canyon’s judgment or investment decisions about securities or asset classes could necessarily produce the intended results. Copper Canyon’s judgment may prove to be incorrect, and a client might not achieve their investment objectives. Copper Canyon may also make future changes to advisory services that it provides. Copper Canyon and its representatives are not responsible to any client for losses unless caused by Copper Canyon breaching its fiduciary duty.

Derivatives Risk – A client’s account containing investments in derivatives involve risks associated with the securities or other assets underlying the derivatives, as well as risks different or greater than the risks affecting the underlying assets. Risk unassociated with the underlying assets include the inability or unwillingness of the other party to a derivative to perform its obligations to an account, an account’s inability or delay in selling or closing positions in derivatives, and difficulties in valuing derivatives.

Derivatives involve significant risk and are not suitable for all investors.

Volatility and Correlation Risk – Clients should be aware that Copper Canyon’s asset selection process is based in part on a careful evaluation of past price performance and volatility in order to evaluate future probabilities. However, it is possible that different or unrelated asset classes may exhibit similar price changes in similar directions which may adversely affect a client and may become more acute in times of market upheaval or high volatility. ***Past performance is no guarantee of future results, and any historical returns, expected returns, or probability projections may not reflect actual future performance.***

Liquidity and Valuation Risk –High volatility and/or the lack of deep and active liquid markets for a security may prevent a client from selling their securities at all, or at an advantageous time or price because Copper Canyon and the client’s broker may have difficulty finding a buyer and may be forced to sell at a significant discount to market value. Some securities (including ETFs) that hold, or trade financial instruments may be adversely affected by liquidity issues as they manage their portfolios. While the value of the securities held in client accounts is based on reasonably available exchange-traded security data, Copper Canyon may from time to time receive or use inaccurate data, which could adversely affect security valuations, transaction size for purchases or sales, and/or the resulting advisory fees paid by a client to Copper Canyon.

Credit Risk – Copper Canyon cannot control the risks that its clients are exposed to when financial intermediaries or security issuers may experience adverse economic consequences that may include impaired credit ratings, default, bankruptcy or insolvency,

any of which may affect portfolio values or management. This risk applies to assets on deposit with any broker utilized by client, notwithstanding asset segregation and insurance requirements that are beneficial to broker clients generally. In addition, exchange trading venues or trade settlement and clearing intermediaries could experience adverse events that may temporarily or permanently limit trading or adversely affect the value of client securities. Finally, any issuer of securities may experience a credit event that could impair or erase the value of the issuer's securities held by a client.

Legislative and Tax Risk - Performance may directly or indirectly be affected by government legislation or regulation, which may include, but is not limited to: changes in investment advisor or securities trading regulation; change in the U.S. government's guarantee of ultimate payment of principal and interest on certain government securities; and changes in the tax code that could affect interest income, income characterization and/or tax reporting obligations (particularly for ETF securities dealing in natural resources). Copper Canyon does not engage in tax planning, and in certain circumstances a client may incur taxable income on their investments without a cash distribution to pay the tax due. Frequent trading may incur short term capital gains taxes that are taxed at an ordinary income tax rate. Frequent trading may incur additional taxes due rather than employing a longer term buy and hold strategy. Mr. Quintilone and Mr. Clay offer tax advice outside of Copper Canyon LLC and use their specialized tax knowledge to benefit investment clients when possible.

Foreign Investing and Emerging Markets Risk - Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

ETF Risks, including Net Asset Valuations and Tracking Error - ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because

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1. The ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark.
 2. Certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and
 3. Supply and demand in the market for either the ETF and/or for the securities held by the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange-traded equity securities, and for which market quotations or valuation may be limited or inaccurate. **Clients should be aware if they invest in ETF securities, they pay two levels of advisory compensation – advisory fees charged by Copper Canyon plus any management fees charged by the issuer of the ETF.** This scenario may cause a higher advisory cost (and potentially lower investment returns) than if a client purchased the ETF directly. An ETF typically includes embedded expenses that may reduce the fund's net asset value, and therefore directly affect the fund's performance and indirectly affect a client's portfolio performance or an index benchmark comparison. Expenses of the fund may include investment advisor management fees, custodian fees, brokerage commissions, and legal and accounting fees. ETF expenses may change from time to time at the sole discretion of the ETF issuer. ETF tracking error and expenses may vary.

Inflation, Currency, and Interest Rate Risks - Security prices and portfolio return vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline. In addition, the relative value of the U.S. dollar-denominated assets primarily managed by Copper Canyon may be affected by the risk that currency devaluations affect client purchasing power.

Frequent Trading Risks - A "buy and hold" strategy with regular re-balancing keeps the trading costs down and the allocation in line over time, however our financial advisors may employ trading strategies that increase client transaction costs through the purchase and sale of multiple securities. Frequent trading can adversely affect portfolio performance and may not be suitable for all clients. Factors that result in decreased portfolio performance include increased brokerage commissions, higher tax rates because of duration held and other trading related costs. **Please consult with Copper Canyon**

about all costs associated with frequent trading strategies, as it is not suitable for all investors.

Item 8 Part C: Recommendation of Specific Securities

Equity/Index Options – The purchase or sale of Equity/Index Options involves unusual risks. These include total loss of investment capital, increased transaction costs, illiquid market risk, and expiration.

For example, an investor purchases a call option for \$50 per standardized option contract with the right to purchase 100 shares of Stock A at \$100 per share. At expiration, Stock A is trading at \$95 per share, which results in the total loss of the purchase price of the call option at \$50.

Equity and index options transactions result in higher commissions and broker costs. For example, options and other derivative products have an expiration date, which makes the portfolio manager open and close the options position more often. This increased trading frequency increases broker commissions and may result in decreased overall portfolio performance.

Equity and index options may be traded on illiquid markets. This results in increased transaction costs because the client does not receive the best execution price.

Equity and Index options have an expiration date. Expiration means the derivative security cease to exist. An unfavorable movement in the underlying stock or index ETF can cause the option contract to expire worthless.

Disciplinary Information - Item 9

Neither Copper Canyon, nor any of its management persons, has been the subject of any material legal or disciplinary action.

Other Financial Industry Activities or Affiliations - Item 10

Item 10 Part A: Not Applicable

Item 10 Part B: Not Applicable

Item 10 Part C: Relationship or arrangement that is material to our advisory business

Copper Canyon LLC's management and related persons have an ownership interest and business relationship with "Quintilone Tax LLC" and "Dylan Quintilone, EA" (these names are doing business as names can be used interchangeably). Dylan Quintilone is 100%

owner of “Dylan Quintilone, EA/Quintilone Tax LLC”. This business relationship may create a conflict of interest with Copper Canyon LLC’s clients.

Mr. Quintilone provides tax preparation and advising services as an Enrolled Agent. An Enrolled Agent is a professional licensed by the Internal Revenue Service. An enrolled agent is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee. Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years.

At times, taxation and investment advice may overlap. Due to the nature of these businesses, Mr. Quintilone and Mr. Clay will clearly disclose when they are providing investment related services or tax related services. This disclosure will be provided in writing and verbally at the onset of the professional relationship.

Mr. Quintilone and Mr. Clay may provide tax advice to Copper Canyon LLC’s investment advisory clients on an informal basis and will clearly disclose to Copper Canyon LLC’s clients if they are providing tax related services outside of the Registered Investment Advisor business. This disclosure will be provided in writing or electronically.

When performing tax related services, Mr. Quintilone and Mr. Clay inform clients of “Dylan Quintilone, EA/Quintilone Tax LLC” that investment advisory services are provided exclusively by Copper Canyon LLC, a state of Florida Registered Investment Advisor. If a client of “Dylan Quintilone, EA/Quintilone Tax LLC” asks investment related questions, they are referred to engage Copper Canyon LLC.

When performing tax related services, if the nature of the tax question has an investment component and it can be answered in relation to the taxation ramifications for the specific client, it will be answered without referring to Copper Canyon LLC. When performing tax related services, “Dylan Quintilone, EA/Quintilone Tax” does not provide any advice that can be used to make investment decisions.

When performing tax related services, “Dylan Quintilone, EA/Quintilone Tax LLC” client’s may ask questions about investment suitability or portfolio construction, in this scenario, the tax client is informed that in order to answer these questions, it is required to refer to Copper Canyon LLC and provide necessary disclosure via Form ADV Part 2A Brochure. In this scenario, the tax client can receive investment advice from Copper Canyon LLC and its investment advisors.

It is possible to engage Copper Canyon LLC for investment related services and not engage “Dylan Quintilone, EA/Quintilone Tax LLC” for tax services.

At the same time, it is possible to engage “Dylan Quintilone, EA/Quintilone Tax LLC” for tax related services and not engage Copper Canyon LLC for investment related services.

It is possible to engage Copper Canyon LLC for investment related services and engage an outside tax professional or service provider.

It is possible to engage “Dylan Quintilone, EA/Quintilone Tax LLC” for tax related services and engage an outside investment professional or service provider for investment related services.

As a courtesy, Copper Canyon LLC clients have access to individual tax preparation services with Quintilone Tax LLC, free of charge.

Item 10 Part D: Not Applicable

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11

Item 11 Part A: Copper Canyon has adopted a Code of Ethics for all employees of the Firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, 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 employees at Copper Canyon must acknowledge the terms of the Code of Ethics annually, or as amended. Copper Canyon’s employees and persons associated with Copper Canyon are required to follow the Firm’s Code of Ethics.

Item 11 Part B: Not Applicable

Item 11 Part C: Subject to satisfying this policy and applicable laws, officers, directors and employees of **Copper Canyon and its affiliates are allowed to trade for their own accounts in securities which are recommended to and/or purchased for the Firm’s clients.**

Item 11 Part D: The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of the employees of Copper Canyon will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of Copper Canyon clients. In addition, the code requires pre-clearance of some transactions and restricts certain trading near client trading activity.

Nonetheless, because the Code of Ethics in some circumstances would permit employees to invest in the same securities as clients, there is a possibility that employees might benefit from market activity by a client in a security held by an employee. Employee trading is continually monitored under the Code of Ethics to reasonably prevent conflicts of interest between Copper Canyon and its clients. Certain affiliated accounts may trade in the same securities with client accounts on an aggregated basis when consistent with Copper Canyon obligation of best execution.

Copper Canyon retains records of the trade order (specifying each participating account) and its allocation, which are completed prior to the entry of the aggregated order. Completed orders are allocated as specified in the initial trade order. Partially filled orders are allocated on a pro-rata basis. Any exceptions are documented. It is Copper Canyon's policy that the Firm does not affect any principal transactions for client accounts. Copper Canyon does not cross trades between client accounts. Principal transactions are generally defined as transactions where an adviser, acting as principal for its own account buys from or sells any security to any advisory client. Copper Canyon clients or prospective clients may request a copy of the Firm's Code of Ethics by contacting the firm.

Brokerage Practices - Item 12

Copper Canyon's preferred broker dealers are Charles Schwab and Interactive Brokers LLC. Our firm maintains professional financial advisor accounts at both Charles Schwab and Interactive Brokers. We choose these broker dealers because of their low-priced trading commissions, free stock trades and trading execution. Although these are our preferred brokers, we use the best available broker based on the below criteria.

Copper Canyon seeks the best overall execution of transactions for client accounts consistent with its judgment as to the business qualifications of the various brokers through which client accounts are available. Copper Canyon obtains information as to the general level of commission rates being charged by the brokerage community from time to time and periodically evaluates the overall reasonableness of brokerage commissions paid on client transactions by reference to such data to ensure competitive commission rates. The factors that Copper Canyon considers when selecting or recommending brokers are matters that directly benefit client accounts, and consistent with obtaining the best execution of their transactions. These factors include execution capability and available liquidity; timing and size of orders; commission rates; responsiveness; trading experience; reputation, integrity and fairness in resolving disputes; quality of their application programming interfaces and technology; and other factors.

Unlike many investment advisors, Copper Canyon does not engage in any “soft dollar” practices involving the receipt of research or other brokerage service in relation to client commission money, nor do we receive any research or other products in connection with client transactions. Copper Canyon also does not use client commission money to compensate or otherwise reward any brokers for client referrals.

Following are additional details regarding the brokerage practices of the Advisor:

Item 12 Part 1: Soft Dollars

Soft dollars are revenue programs offered by broker-dealers whereby an advisor enters into an agreement to place security trades with the broker in exchange for research and other services. **Copper Canyon does not participate in soft dollar programs sponsored or offered by any broker-dealer.**

Item 12 Part 2: Brokerage Referrals

Copper Canyon does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.

Item 12 Part 3: Directed Brokerage

All clients are serviced on a “directed brokerage basis”, where Copper Canyon places trades within the established accounts at the custodian designated by the client. Further, all client accounts are traded within their respective brokerage accounts. The advisor does not engage in any principal transactions (i.e., trade of any security from or to the Advisor’s own account) or cross transactions with other client accounts (i.e., purchase of a security into one client account from another client’s accounts). In selecting the custodian, Copper Canyon is not obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated custodian.

Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as

1. Price
2. Size of order
3. Difficulty of execution
4. Confidentiality
5. Skill required of the broker

Copper Canyon does execute its transactions through an unaffiliated broker-dealer selected by the client. Copper Canyon may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts (when possible). If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage client accounts.

Interactive Brokers Lite Accounts

Our clients utilize a service provided by Interactive Brokers LLC called IBKR LITE. IBKR LITE is a specific variation of client account provided by Interactive Brokers LLC, where the client receives \$0 dollar commissions to buy and sell US exchange-traded stocks and ETFs. IBKR LITE provides \$0 dollar commissions in exchange for the right to sell and route orders to certain market makers. IBKR LITE lowers investment costs and other transaction fees that then benefit the client. The IBKR LITE Service does charge trading fees on several investment vehicles, including bonds, forex, futures, options, mutual funds, and foreign equities. The client may be charged regulatory fees as required by the specific stock exchanges.

While we believe IBKR LITE provides our clients the best commission structure for stock and ETF trading, it should be noted that IBKR PRO is a commission-based service available to clients. With IBKR PRO there is a commission structure of USD 0.005 per share and a minimum order fee of \$1.00 and a maximum order fee of 1% of the transaction value. More information can be found at www.interactivebrokers.com.

The client has the option to choose any broker they prefer; however, we recommend clients open an account with Interactive Brokers LLC or Charles Schwab, where our firm maintains professional financial advisor accounts.

Review of Accounts - Item 13

Item 13 Part A: Frequency of Reviews

Accounts are monitored on a regular and continuous basis by Dylan Quintilone, Managing Member of Copper Canyon. Formal reviews are generally conducted at least quarterly or more or less frequently depending on the needs of the client.

Item 13 Part B: Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each client account shall be reviewed at least annually. Reviews may be conducted more or less frequently at the client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the client's financial situation, and/or large deposits or withdrawals in the client's account. The client is encouraged to notify Copper Canyon if changes occur in his/her personal financial situation that might adversely affect his/her investment plan. Additional reviews may be triggered by material market, economic or political events.

Item 13 Part C: Review Reports

The client receives brokerage statements no less than quarterly from the trustee or custodian. These brokerage statements are sent directly from the custodian to the client. The client may also establish electronic access to the custodian's website so that the client may view these reports and their account activity. Client brokerage statements include all positions, transactions and fees relating to the client's accounts. The Advisor may also provide clients with periodic reports regarding their holdings, allocations, and performance.

Client Referrals and Other Compensation - Item 14

Other Compensation/Referrals

Copper Canyon is a registered investment advisor, which primarily receives its compensation directly from its clients. Copper Canyon may refer clients to various third-parties to provide certain financial services necessary to meet the goals of its clients. Likewise, Copper Canyon may receive referrals of new clients from a third-party. Copper Canyon does not receive compensation for these referral activities.

Copper Canyon LLC may refer tax related matters to "Dylan Quintilone, EA/Quintilone Tax LLC". Copper Canyon LLC does not compensate "Dylan Quintilone, EA/Quintilone Tax" for these referrals. Mr. Quintilone and Mr. Clay receive an economic benefit if the referred party engages "Dylan Quintilone, EA/Quintilone Tax LLC" for tax services.

Client Referrals from Solicitors

Copper Canyon does not engage in paid solicitors for client referrals.

Custody - Item 15

Copper Canyon does hold custody of client accounts in a limited capacity to direct deduct fees from client accounts. Clients are invoiced directly in arrears from Copper Canyon for the services rendered.

Client investment assets are held with a custodian chosen by the client. The custodian sends a statement to the client, at least quarterly, indicating the performance and asset values of the client investment accounts.

Custody – Account Statements

As described above and in Item 13, clients receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains client's investment assets. **Clients are urged to carefully review such statements and compare such official custodial records to the account statements or other reports that Copper Canyon provides.** Copper Canyon statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Investment Discretion - Item 16

Through the investment management agreement or additional documents, Copper Canyon may be granted a limited power of attorney or Discretionary Trading Authorization to make trades on a client's behalf. This authorization allows Copper Canyon to execute trades without needing prior approval from the client, including decisions about the amount and type of securities to buy based on the client's account objectives.

Clients can set specific limitations or restrictions on this authority, and any such limitations must be provided in writing. If a trading authorization has not been given, Copper Canyon will consult with the client before executing a trade to ensure agreement.

Voting Client Securities - Item 17

Copper Canyon typically does not vote proxies on behalf of clients. Generally, clients retain the responsibility for receiving and voting proxies for securities maintained in their portfolios; clients receive these proxies directly from either custodians or transfer agents. Copper Canyon does not render advice to or take any actions on behalf of clients with respect to any legal proceedings, including bankruptcies and shareholder litigation. In limited circumstances, Copper Canyon may vote proxies on behalf of clients. When the responsibility to vote proxies has been assigned to Copper Canyon, the firm's utmost concern is that all decisions be made solely in the best interest of the client. Copper

Canyon acts in a prudent and diligent manner intended to enhance the economic value of the assets of the client's portfolio.

Dylan Quintilone, Principal and Chief Compliance Officer is ultimately responsible for ensuring that all proxies received by Copper Canyon are passed onto the client to allow the client to vote their securities.

Financial Information - Item 18

Copper Canyon has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of bankruptcy proceeding.

Item 18 Part A: Copper Canyon does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Item 18, Part B: Not Applicable. There are no financial conditions that could affect Copper Canyon's ability to meet its contractual commitments to clients.

Item 18, Part C: Not Applicable. Neither Copper Canyon nor its management persons have been involved in any bankruptcy filings within the past 10 years.

Requirements of State-Registered Advisers - Item 19

Item 19 Part A: Identification of Principal Executive Officers & Management Persons:

The educational and work background of Copper Canyon's Principal:

Dylan Quintilone CRD# 6732024

Dylan Quintilone, born October 5th, 1992, is a managing member and Principal of Copper Canyon LLC. He graduated from the University of Central Florida with a bachelor's in finance. Dylan Quintilone is involved in the day-to-day activities of the firm and oversees all company activities by enacting portfolio management and financial advice on behalf of the firm's clients. Dylan Quintilone administers portfolio management and stock research for the firm's clients. Over the years, Dylan Quintilone has developed strong analytical skills and client relationship expertise. He acts as a Financial Advisor and Equity Portfolio Manager of the firm and is dedicated to advising Copper Canyon clients.

Item 19 Part B: Business in which you are actively engaged (other than giving investment advice)

As of 01/25/2022, Dylan Quintilone, Chief Compliance Officer and Principal of Copper Canyon LLC does have outside business activities.

Dylan Quintilone offers tax preparation services through Quintilone Tax LLC, a state of Florida limited liability company. The business operates under the names Dylan Quintilone, EA and/or Quintilone Tax LLC. This business is not investment related. The address of the business is 4700 Millenia Blvd Suite 175 Orlando, Florida 32839. Mr. Quintilone exclusively meets clients at this location through scheduled appointments and does not conduct work from this premises during all hours of the workday.

This business provides tax preparation services for individuals and businesses. Dylan Quintilone dedicates approximately 8 hours a day to this business, Monday to Friday 9:00 am to 5:00 pm. Mr. Quintilone dedicates additional time on Saturday and Sunday when needed, Saturday from 11:00 am to 4:00 pm and Sunday 12:00pm to 3:00 pm. The business primarily operates from January to April, as this period aligns with tax filing season. The hours worked in this business are during market trading hours. Mr. Quintilone operates Copper Canyon LLC and “Dylan Quintilone, EA/Quintilone Tax LLC” simultaneously. Mr. Quintilone received 30% of his earned income from this business in 2024 and 70% of his earned income from Copper Canyon LLC.

Mr. Quintilone may answer inquiries relating to tax preparation services during market trading hours. Mr. Quintilone prepares individual tax returns to be filed with the IRS. Mr. Quintilone receives compensation for these services. He receives \$475 “four hundred dollars” per tax return filed. Mr. Quintilone offers federal tax debt resolution services. He offers these services for a flat fee. More details as to the price of his services for are listed at <https://quintilonetax.com/index.php/pricing/>

As of March 2022, Dylan Quintilone earned his Enrolled Agent Designation. An enrolled agent is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee.

The Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years.

Enrolled agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights. This means they are unrestricted as to which taxpayers they can represent, what types of tax matters they can handle, and which IRS offices they can represent clients before.

Copper Canyon LLC Equity Portfolio Manager, Financial Advisor and Chief Compliance Officer	October 2016 – Current
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Dylan Quintilone, Enrolled Agent & Independent Tax Preparation “Quintilone Tax LLC” “Dylan Quintilone, EA”	February 2022 – Current
Seeking Alpha Contributor	August 2018 – December 2018
Andes Research Group LLC Owner	October 2018 – May 2019
Lockheed Martin Multi-Functional Finance Analyst	September 2017 – November 2017
UCF/Lockheed Martin CWEP Manufacturing Operations	May 2016 – August 2017
Young Investors Club Chief Investment Officer	May 2016 - December 2016
University of Central Florida B.S.B.A. Finance	May 2015 – August 2017
Seeking Alpha Contributor	January 2016 - August 2016
Independent Stock and Options Trader	January 2013 - May 2016
Valencia College Associate in Arts General Studies	May 2013 - May 2015

Item 19 Part C: Supervised person compensation for advisory services with performance-based fees

Not applicable, Mr. Quintilone does not receive any performance-based fees.

Item 19 Part D: Not Applicable

Item 19 Part E: Not Applicable

Form ADV Part 2B: Brochure Supplement

Item 1: Cover Page

Dylan Quintilone, is the Chief Executive Officer and Chief Compliance Officer of Copper Canyon LLC. Mr. Quintilone conducts business at Copper Canyon's office located at 4700 Millenia Blvd Suite 175 Orlando, Florida 32839. Mr. Quintilone exclusively meets clients at this location through scheduled appointments and does not conduct work from these premises during all hours of the workday. The telephone number is 407-864-2702. The date of this supplement is 01/06/2025.

This brochure supplement provides information about Dylan Quintilone that supplements the Copper Canyon LLC brochure. You should have received a copy of that brochure. Please contact Dylan Quintilone at 407-864-2702 if you did not receive Copper Canyon's brochure or if you have any questions about the contents of this supplement.

Additional information about Dylan Quintilone is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Dylan Quintilone CRD# 6732024

Dylan Quintilone, born October 5th, 1992, is a managing member and Principal of Copper Canyon LLC. He graduated from the University of Central Florida with a bachelor's in finance. Dylan Quintilone is involved in the day-to-day activities of the firm and oversees all company activities by enacting portfolio management and financial advice on behalf of the firm's clients. Dylan Quintilone administers portfolio management and stock research for the firm's clients. Over the years, Dylan Quintilone has developed strong analytical skills and client relationship expertise. He acts as a Financial Advisor and Equity Portfolio Manager of the firm and is dedicated to advising Copper Canyon clients.

Copper Canyon LLC Equity Portfolio Manager, Financial Advisor and Chief Compliance Officer	October 2016 – Current
Dylan Quintilone, Enrolled Agent & Independent Tax Preparation "Quintilone Tax LLC" "Dylan Quintilone, EA"	February 2022 – Current
Seeking Alpha Contributor	August 2018 – December 2018
Andes Research Group LLC Owner	October 2018 – May 2019
Lockheed Martin Multi-Functional Finance Analyst	September 2017 – November 2017
UCF/Lockheed Martin CWEP Manufacturing Operations	May 2016 – August 2017
Young Investors Club Chief Investment Officer	May 2016 - December 2016
University of Central Florida B.S.B.A. Finance	May 2015 - August 2017
Seeking Alpha Contributor	January 2016 - August 2016
Independent Stock and Options Trader	January 2013 - May 2016
Valencia College Associate in Arts General Studies	May 2013 - May 2015

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Quintilone. Mr. Quintilone has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Quintilone. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Quintilone. However, we do encourage you to independently view the background of Mr. Quintilone on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 6732024 in the field labeled "Individual Name or CRD Number".

Item 4: Other Business Activities

As of 01/25/2022, Dylan Quintilone, Chief Compliance Officer and Principal of Copper Canyon LLC does have outside business activities.

Dylan Quintilone offers tax preparation services through Quintilone Tax LLC, a state of Florida limited liability company. The business operates under the names Dylan Quintilone, EA and/or Quintilone Tax LLC. This business is not investment related. The address of the business 4700 Millenia Blvd Suite 175 Orlando, FL 32839. Mr. Quintilone exclusively meets clients at this location through scheduled appointments and does not conduct work from this premises during all hours of the workday. The business provides tax preparation services for individuals and businesses. Dylan Quintilone dedicates approximately 8 hours a day to this business, Monday to Friday 9:00 am to 5:00 pm. Mr. Quintilone dedicates additional time on Saturday and Sunday when needed, Saturday from 11:00 am to 4:00 pm and Sunday 12:00pm to 3:00 pm. The business primarily operates from January to April, as this period aligns with tax filing season. The hours worked in this business are during market trading hours. Mr. Quintilone operates Copper Canyon LLC and "Dylan Quintilone, EA/Quintilone Tax LLC" simultaneously. Mr. Quintilone received 30% of his personal income from this business in 2024.

As of March 2022, Dylan Quintilone earned his Enrolled Agent Designation. An enrolled agent is a person who has earned the privilege of representing taxpayers before the Internal Revenue Service by either passing a three-part comprehensive IRS test covering individual and business tax returns, or through experience as a former IRS employee.

The Enrolled agent status is the highest credential the IRS awards. Individuals who obtain this elite status must adhere to ethical standards and complete 72 hours of continuing education courses every three years.

Enrolled agents, like attorneys and certified public accountants (CPAs), have unlimited practice rights. This means they are unrestricted as to which taxpayers they can represent, what types of tax matters they can handle, and which IRS offices they can represent clients before. The website for this business can be visited at www.dylanquintilone.com/ or www.quintilonetax.com/

At times, taxation and investment advice may overlap. Due to the nature of these businesses, Mr. Quintilone and Mr. Clay will clearly disclose when they are providing investment related services or tax related services. This disclosure will be provided in writing and verbally at the onset of the professional relationship.

Mr. Quintilone and Mr. Clay may provide tax advice to Copper Canyon LLC's investment advisory clients on an informal basis and will clearly disclose to Copper Canyon LLC's clients if they are providing tax related services outside of the Registered Investment Advisor business. This disclosure will be provided in writing or electronically.

When performing tax related services, Mr. Quintilone and Mr. Clay inform clients of "Dylan Quintilone, EA/Quintilone Tax LLC" that investment advisory services are provided exclusively by Copper Canyon LLC, a state of Florida Registered Investment Advisor. If a client of "Dylan Quintilone, EA/Quintilone Tax LLC" asks investment related questions, they are referred to engage Copper Canyon LLC.

When performing tax related services, if the nature of the tax question has an investment component and it can be answered in relation to the taxation ramifications for the specific client, it will be answered without referring to Copper Canyon LLC. When performing tax related services, "Dylan Quintilone, EA/Quintilone Tax LLC" does not provide any advice that can be used to make investment decisions.

When performing tax related services, "Dylan Quintilone, EA/Quintilone Tax LLC" client's may ask questions about investment suitability or portfolio construction, in this scenario, the tax client is informed that in order to answer these questions, it is required to refer to Copper Canyon LLC and provide necessary disclosure via Form ADV Part 2A Brochure. In this scenario, the tax client can receive investment advice from Copper Canyon LLC and its investment advisors.

It is possible to engage Copper Canyon LLC for investment related services and not engage "Dylan Quintilone, EA/Quintilone Tax" for tax services.

At the same time, it is possible to engage "Dylan Quintilone, EA/Quintilone Tax LLC" for tax related services and not engage Copper Canyon LLC for investment related services.

It is possible to engage Copper Canyon LLC for investment related services and engage an outside tax professional or service provider.

It is possible to engage “Dylan Quintilone, EA/Quintilone Tax LLC” for tax related services and engage an outside investment professional or service provider for investment related services.

Item 5: Additional Compensation

Mr. Quintilone does not receive additional compensation.

Item 6: Supervision

As part of our overall compliance and supervisory process, we monitor the advisory activities of all of our supervised persons. As part of the supervisory process over the advisory activities of all of our supervised persons, Dylan Quintilone, Chief Compliance Officer of Copper Canyon LLC serves the role of Designated Supervisor and in that capacity, Mr. Quintilone shall carry out the following general supervisory steps.

- Periodic review of customer account activity
- Observation during client meetings and/or phone calls
- On-site inspection of each of our supervised person’s office location (if other than our main office)

In order to ensure that we are effectively and consistently carrying out our supervisory process over all of our supervised persons’ advisory activities, we maintain a set of policies and procedures (“WSP”) that, among other things, address matters such as supervision of the activities of our supervised persons. Our Policies and Procedures manual is the guiding force behind all of our supervisory functions and is subject to the regular inspection by any regulatory bodies having jurisdiction over our investment advisory activities.

Dylan Quintilone’s Contact Information:

4700 Millenia Blvd Suite 175

Orlando, FL 32839

+1- 407-864-2702

Item 7: Requirements for State-Registered Advisers

There are no legal, civil or disciplinary events to disclose regarding Mr. Quintilone. Mr. Quintilone has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Quintilone. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Quintilone.

Item 1: Cover Page

Paul Edward Clay, is an Investment Advisor Representative with Copper Canyon LLC. Mr. Clay conducts business at Copper Canyon's office located at 4700 Millenia Blvd Suite 175 Orlando, FL 32839. Mr. Clay exclusively meets clients at this location through scheduled appointments and does not conduct work from these premises during all hours of the workday. The telephone number is 407-864-2702. The date of this supplement is 01/06/2025.

This brochure supplement provides information about Paul Edward Clay that supplements the Copper Canyon LLC brochure. You should have received a copy of that brochure. Please contact Dylan Quintilone at 407-864-2702 if you did not receive Copper Canyon's brochure or if you have any questions about the contents of this supplement.

Additional information about Paul Edward Clay is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

Paul Edward Clay CRD# 7145606

Paul Edward Clay, born June 10th, 1974, is an Investment Advisor Representative with Copper Canyon LLC. He graduated from the Lake-Sumter State College with a bachelor's in organizational management. Mr. Clay is involved in the day-to-day activities of the firm and oversees specific company activities by enacting portfolio management and financial advice on behalf of the firm's clients. Mr. Clay administers portfolio management and stock research for the firm's clients. Over the years, Mr. Clay has developed strong sales

skills and an advanced knowledge in negotiation mastery. Mr. Clay acts as a Financial Advisor of the firm.

Copper Canyon LLC Investment Advisor Representative	June 2019 – Current
Independent Tax Preparer, “Quintilone Tax LLC” “Dylan Quintilone, EA”	January 2023 - Current
DENRIC INC. Shareholder	January 2022 - Current
Priority Express Parcel General Manager	2008 – Current
Independent Tax Preparer	March 2022 – December 2022

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Clay. Mr. Clay has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Clay. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Clay. However, we do encourage you to independently view the background of Mr. Clay on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov. Select Investment Adviser Search from the left navigation menu. Then select the option for Investment Adviser Representative and enter 7145606 in the field labeled “Individual Name or CRD Number”.

Item 4: Other Business Activities

As of 01/03/2022, Mr. Clay, has outside business activities. Mr. Clay receives compensation for his role as a General Manager at Priority Express Parcel in Orlando, Florida. Mr. Clay dedicates approximately 35 hours a week to this role and all of this time is during market hours. Mr. Clay receives an annual salary from Priority Express Parcel.

As of January 1st, 2022, Paul Clay owns 20% of DENRIC Inc. DENRIC Inc. is also known to do business as Priority Express Parcel. Mr. Clay is entitled to 20% of profits from the company. Mr. Clay dedicates approximately 5 hours a week to this role and all of this time is during

market hours. This is not a publicly traded company and Mr. Clay's shares are non-voting shares.

Mr. Clay derives 99% of his income from Denric Inc and Priority Express Parcel.

Paul Clay offers tax preparation services as an independent contractor through "Dylan Quintilone, EA/Quintilone Tax LLC". This business is not investment related. The address of the business is 4700 Millenia Blvd Suite 175 Orlando, FL 32839. Mr. Clay exclusively meets clients at this location through scheduled appointments and does not conduct work from this premises during all hours of the workday. This business provides tax preparation services for individuals and businesses. Mr. Clay dedicates approximately 0 to 2 hours a week to this business, Monday to Sunday. The business primarily operates from January to April, as this period aligns with tax filing season. The hours worked in this business are generally not during market trading hours. Paul Clay may answer inquiries relating to tax preparation services during market trading hours. Mr. Clay acquires clients and assists in the preparation of individual tax returns to be filed with the IRS. Mr. Clay receives compensation for these services. The business website is www.quintilonetax.com/. More information can be found at this web address.

Mr. Clay's compensation from Tax Preparation in 2024 was immaterial. It is expected that during 2025, tax preparation income will be less than 1% of his total annual income.

Item 5: Additional Compensation

Mr. Clay does not receive additional compensation.

Item 6: Supervision

As part of our overall compliance and supervisory process, we monitor the advisory activities of all of our supervised persons. As part of the supervisory process over the advisory activities of all of our supervised persons, Dylan Quintilone, Chief Compliance Officer of Copper Canyon LLC serves the role of Designated Supervisor and in that capacity, Mr. Quintilone shall carry out the following general supervisory steps over Paul Edward Clay's Investment Advisory activities.

- Periodic review of customer account activity
- Observation during client meetings and/or phone calls
- On-site inspection of each of our supervised person's office location (if other than our main office)

In order to ensure that we are effectively and consistently carrying out our supervisory process over all of our supervised persons' advisory activities, we maintain a set of

policies and procedures (“WSP”) that, among other things, address matters such as supervision of the activities of our supervised persons. Our Policies and Procedures manual is the guiding force behind all of our supervisory functions and is subject to the regular inspection by any regulatory bodies having jurisdiction over our investment advisory activities.

Dylan Quintilone’s Contact Information:

4700 Millenia Blvd Suite 175

Orlando, FL 32839

+1- 407-864-2702

Item 7: Requirements for State-Registered Advisers

There are no legal, civil or disciplinary events to disclose regarding Mr. Clay. Mr. Clay has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Clay. Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Clay.