

Cover Page - Item 1

Copper Canyon LLC

A Florida Registered Investment Advisor

Copper Canyon LLC

13219 Granger Ave,

Orlando, FL 32827

(407) 864-2702

www.coppercanyonllc.com

Form ADV Part 2A Brochure

February 13, 2020

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 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: Ccanyonllc@gmail.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

Material Changes - Item 2

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

Material Change in Ownership

As of July 4, 2017, Nicolas Agudelo, who held the positions of Managing Member and Chief Compliance Officer of Copper Canyon LLC is not employed and no longer holds an ownership stake in the firm. As of July 4, 2017, Dylan Quintilone, Managing Member and Chief Executive Officer acquired 100% ownership in the firm and has assumed the position of Chief Compliance Officer effective July 4th, 2017.

Collection of Fees

As of January 1, 2018, 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. The quarterly periods will be January 1st to March 31st, April 1st to June 30th, July 1st to September 30th and October 1st to December 31st.

The invoice days are April 1st, July 1st, October 1st and January 1st or within 30 days of the end of the quarter.

Financial Planning Services

As of February 3, 2019, Copper Canyon does not perform Financial Planning Services.

Calculation of Portfolio Management Fees

As of 3/19/2019, Copper Canyon sends clients portfolio management invoices quarterly. To calculate the quarterly invoice, we calculate three separate monthly invoices and combine them into a quarterly statement. For illustrative purposes we will calculate client X's portfolio management fee for the 1st quarter.

Client X had a closing monthly account values for January, February and March of \$95,000; \$100,000; and \$105,000.

When you calculate the 0.01% assets under management fee, it is divided by 12 months and equals a ratio of .000833333. This 0.000833333 value is then multiplied by the ending monthly value of the clients account to get a monthly fee.

Client X had a January monthly closing value of \$95,000. This value was then multiplied by 0.000833333, which equates to a January management fee of \$79.17.

Client X had a February monthly closing value of \$100,000. This value was then multiplied by 0.000833333, which equates to a February management fee of \$83.33.

Client X had a March monthly closing value of \$105,000. This value was then multiplied by 0.000833333, which equates to a March management fee of \$87.50.

When you combine the individual January, February and March fees together it equals \$250 for the 1st quarter portfolio management invoice.

Interactive Brokers Direct Fee Deduction

As of June 28th, 2019, Copper Canyon does deduct portfolio management fees from Interactive Brokers client accounts. All Interactive Brokers clients will receive quarterly invoices that are calculated based on the monthly closing values for the months in the quarter. We send a portfolio management invoice for the period in which services were performed prior to deducting any fees from client accounts.

Relocation of Principal Office

As of February 3rd, 2020, Copper Canyon LLC moved their principal office location from 111 N Orange Ave Suite 800, Orlando FL 32801 to a new location at 13219 Granger Ave, Orlando, FL 32827.

New Interactive Brokers Investment Models

As of January 1st, 2020, Copper Canyon LLC began management of two new investment models called the Dynamic Active Equity Model and Dynamic Income Model. Please see Item 8 Part C for additional information.

Table of Contents – Item 3

Cover Page - Item 1
.....1

Material Changes - Item 2
.....2

Table of Contents - Item 3
.....4

Advisory Business - Item 4
.....6

Fees and Compensation - Item 5
.....8

Performance-Based Fees and Side-By-Side Management - Item 6
.....11

Types of Clients - Item 7
.....11

Methods of Analysis, Investment Strategies and Risk of Loss - Item 8
.....12

Disciplinary Information - Item 9
.....17

Other Financial Industry Activities or Affiliations - Item 10
.....17

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading - Item 11
.....17

Brokerage Practices - Item 12
.....18

Review of Accounts - Item 13

.....	20
<u>Client Referrals and Other Compensation - Item 14</u>	
.....	21
<u>Custody - Item 15</u>	
.....	21
<u>Investment Discretion - Item 16</u>	
.....	21
<u>Voting Client Securities - Item 17</u>	
.....	22
<u>Financial Information - Item 18</u>	
.....	22
<u>Requirements of State-Registered Advisers - Item 19</u>	
.....	22
<u>Form ADV Part 2B Brochure Supplement</u>	
.....	24

This Brochure contains 31 pages and is not complete without all pages.

Advisory Business - 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 strictly 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.

Part B: Types of Advisory Services

Copper Canyon provides personalized confidential investment management to individuals. We give advice through consultation with the client and/or clients of which projections may include: determination of financial objectives, investment management and retirement projections. We provide investment advice to the client, however the final decision for investment selections remains with the client. Copper Canyon does act as a custodian of client assets in a limited capacity to deduct fees from client accounts. The firm bills the client directly with an invoice of the fees to be paid to Copper Canyon for services rendered. The firm maintains proper controls as required by the Securities and Exchange Commission and state regulators over client assets. The firm may take discretionary authority for rebalancing client accounts and transacting securities in the client’s best interests. Depending on the client investment needs, Copper Canyon places trades for clients under a limited power of attorney. An evaluation of each client’s initial situation is provided to the client. Periodic reviews are also communicated to provide reminders of the specific course of action that need to be taken. More frequent reviews occur but are not necessarily communicated to the client unless immediate changes are recommended. Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur. The initial consultation, which is in person, is an exploratory interview to determine the suitability of specific investment strategies that may be beneficial to the client. We analyze the client’s current financial situation through client questionnaires, in person conversations, written correspondence and the client’s previous investment experience.

Upon addressing the client’s specific needs, Copper Canyon specializes in utilizing multiple portfolio management strategies dependent on the client’s risk tolerance. We strive to align our clients’ portfolios with a risk tolerance that is appropriate for their financial needs and retirement goals. We practice modern portfolio theory by constructing client portfolios that minimize risk and maximize returns. Modern portfolio theory attempts to maximize a portfolio’s expected

return for a given amount of portfolio risk, or equivalently minimize risk for a given level of expected return, that match varying levels of risk to maximize an expected return.

We invest client assets in liquid securities. These securities include individual equities, ETF's, Index ETF's, equity options, index options, futures, commodities, bonds, and treasuries. The most liquid securities can be defined by identifying securities with a bid-ask spread frequently, but not always under \$0.05. A low bid ask spread ensures the client receives a fair transaction price.

We maintain fiduciary standard and only invest in securities that align appropriately with client financial goals.

Part B: Types of Advisory Services Continued

Portfolio Management

Clients may choose to have Copper Canyon manage their assets to obtain ongoing portfolio management. The scope of work and fee for ongoing Portfolio Management Services is detailed in the Portfolio Management Agreement, which is provided to the client in writing prior to the start of the relationship. A management agreement includes: term of the contract, details of investment fees, fiduciary standard, client rights, specific management strategies, tailored services and discretionary trading authority, abirritation agreement and non-assignment clause.

Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

Copper Canyon's primary investment strategy is based on the critical influence of the asset allocation of a portfolio. Assets are invested primarily in individual equities, index ETF's, ETF's, equity options and index options. Investments may also include: corporate debt securities, certificates of deposit, municipal securities and U.S. government securities. A "buy and hold" strategy with regular re-balancing keeps the trading costs down and the allocation in line over time. Copper Canyon's primary investment strategy is based on the critical influence of the asset allocation of a portfolio. The Firm believes it is the particular mix of fixed income and equity investments that explains and produces a portfolio's rate of return and degree of fluctuations in value. The Firm studies research and utilizes software to design mixes of asset classes whose correlation coefficients attempt to obtain an appropriate level of return per unit of acceptable fluctuation or risk. "Correlation coefficients" means that one asset class will have a different pattern of return from another asset class; in simple terms, one investment may be going up in value while another is going down. The goal is to have a mix, so the entire portfolio is not going down at the same time, while growing at a desired rate.

We may utilize equity options or index options to hedge portfolio risk. This means we will purchase option contracts that have an inverse relation to an equity holding or portfolio allocation. The Firm may utilize covered call, cash secured put and spread option strategies to

produce a statistically based return. The Firm may also use alternative investment strategies to produce income for client's portfolio such as buying/selling put options and option spreads. 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 further explanation please refer to Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss. We reserve the right to utilize other portfolio management strategies not mentioned above as the Firm deems appropriate on a case by case basis for the client.

Part C: Tailoring Services to Individual Clients

Copper Canyon tailor's advisory services to the individual needs of clients. We assess the client's financial situation and make independent recommendations based on the client's goals and financial situation. Clients are able to impose restrictions on investing in certain securities by informing Copper Canyon and the advisor of what securities they do not want their assets invested in. The client must inform Copper Canyon in writing with the specific securities or asset classes they do not want their assets invested in. On the receipt of this notice, Copper Canyon will take proper action to fulfill the client's request.

Part D: Involvement in a Wrap Fee Program

Not applicable

Part E: Amount of Assets Under Management

As of February 13, 2020, Copper Canyon LLC manages approximately \$1,180,000 in assets on a discretionary basis and \$0 in assets on a non-discretionary basis.

Fees and Compensation - Item 5

Part A: Method of Compensation

Copper Canyon LLC bases its fees on a percentage of assets under management and/or an hourly research fee. The portfolio management fees will be collected in arrears on the first day of each quarter for asset management services provided the previous quarter. We collect research and consultation fees upon completion of performing the service.

As of January 1, 2018, Copper Canyon will bill clients on a quarterly basis. We will 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 will be January 1st to March 31st, April 1st to June 30th, July 1st to September 30th and October 1st to December 31st.

The invoice days will be April 1st, July 1st, October 1st and January 1st, or within 30 days of the end of the quarter.

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 - \$2,000,000	1.00% (100 Basis Points)
\$2,000,001 - Above	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 under \$25,000 will incur a \$20 per month minimum fee. When you combine these monthly fees in a client's quarterly invoice, the fee for the quarter equals \$60. This fee may be negotiable; however, any fee beyond or below the stated range is determined by the Firm's principal.

Accounts with assets between \$25,000 - \$2,000,000 will be 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 will be 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.

Calculation of Portfolio Management Fees:

Clients are sent portfolio management invoices quarterly. To calculate the quarterly invoice, we calculate three separate monthly invoices and combine them into a quarterly statement. For illustrative purposes we will calculate client X's portfolio management fee for the 1st quarter.

Client X had a closing monthly account values for January, February and March of \$95,000; \$100,000; and \$105,000.

When you calculate the 0.01% assets under management fee, it is divided by 12 months and equals a ratio of .000833333. This 0.000833333 value is then multiplied by the ending monthly value of the clients account to get a monthly fee.

Client X had a January monthly closing value of \$95,000. This value was then multiplied by 0.000833333, which equates to a January management fee of \$79.17.

Client X had a February monthly closing value of \$100,000. This value was then multiplied by 0.000833333, which equates to a February management fee of \$83.33.

Client X had a March monthly closing value of \$105,000. This value was then multiplied by 0.000833333, which equates to a March management fee of \$87.50.

When you combine the individual January, February and March fees together it equals \$250 for the 1st quarter portfolio management invoice.

For the benefit of discounting your asset-based fee, we may aggregate investment supervisory services accounts for the same individual or two or more accounts within the same family, or accounts where a family member has power of attorney over another family member's or incompetent person's account. Should, however, investment objectives be substantially different for any two or more household accounts, requiring different investment approaches or operational requirements, we do reserve the right to apply our fee schedule separately to each account. For all noted forms of advisory engagements with our firm, the services to be provided to you and their specific fees will be detailed in your engagement agreement.

Past Due Accounts and Termination of Agreement

The client or the investment manager may terminate an agreement by providing 2 days written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the service performed or completed. The portfolio value at the completion of the prior full billing period is used as the basis for the fee computation, adjusted for the number of days during the billing period prior to termination. Copper Canyon reserves the right to stop work on any account that is more than 60 days overdue. In addition, Copper Canyon reserves the right to terminate any investment management engagement where a client has willfully concealed or has refused to provide pertinent information about financial situations when necessary and appropriate, in Copper Canyon's judgment, to providing proper financial advice. Any unused portion of fees collected will be refunded within 60 days.

Part B: Collection of fees

Copper Canyon receives payments in different methods. Copper Canyon invoices the client directly, by calculating the monthly fee based on the percentage of assets under management. The exact asset under management fee calculation is described in the fee schedule above. The Firm invoices the client directly through electronic communication and/or standard direct mail. Copper Canyon receives payments in various methods such as electronic ACH transfer, personal check, e-check, Peer to Peer instant payment, physical cash and electronic Square invoicing services.

Copper Canyon does hold client funds under custody. Copper Canyon will invoice the client directly for any services performed. Copper Canyon will provide an invoice of all management fees performed directly on behalf of the client. The client then has 28 calendar days from the receipt of the invoice to pay in full.

The types of payment Copper Canyon will accept includes, checks and other cash transactions such as (electronic ACH transfer, personal check, e-check, Peer to Peer instant payment and physical cash and electronic Square invoicing services).

Part C: Other Fees

Other fees may include, but are limited to, monthly paper statement fee, and transactions 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 will be subject to identification procedures. These procedures will be full legal name, home address, date of birth and social security number.

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 provides services primarily to individuals and a small number of small businesses.

There is a minimum account size of \$100,000 (One Hundred Thousand) for Portfolio Management Services. We reserve the right to accept accounts under \$100,000 (One Hundred Thousand) in assets. The criteria for accepting accounts with an asset amount below the stated minimum is based on the client's age, income, and/or investment experience and will be determined by the Firm's principal.

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

Part A: Methods of Analysis

We utilize multiple portfolio management strategies dependent on the client's risk tolerance. We strive to align our clients' portfolios with a risk tolerance that is appropriate for their financial needs and retirement goals. We analyze the client's current financial situation through client questionnaires, in person conversations, written correspondence and the client's previous investment experience. We practice modern portfolio theory by constructing client portfolios that minimize risk and maximize returns. Modern portfolio theory attempts to maximize a portfolio's expected return for a given amount of portfolio risk.

We invest client assets in the most liquid securities. These securities include individual equities, ETF's, index ETF's, equity options, index options, futures, commodities, bonds, and treasuries. The most liquid securities can be defined by having a bid-ask spread under \$0.05. A low bid-ask spread ensures the client receives a fair transaction price upon the purchase or sale of a security.

Client portfolios are primarily invested in individual equities, Index ETF's, ETF's, equity options and index options. Investments may also include: corporate debt securities, certificates of deposit, municipal securities and U.S. government securities.

Copper Canyon's primary investment strategy is based on the critical influence of the asset allocation of a portfolio. The Firm believes it is the particular mix of fixed income and equity investments that explains and produces a portfolio's rate of return and degree of fluctuations in value. The Firm studies research and utilizes advanced market knowledge to design mixes of asset classes whose correlation coefficients attempt to obtain an appropriate level of return per unit of acceptable fluctuation or risk. "Correlation coefficients" means that one asset class will have a different pattern of return from another asset class; in simple terms, one investment may be going up in value while another is going down. The goal is to have a mix so the entire portfolio is not going down at the same time, while growing at a desired rate.

We may utilize equity options or index options to hedge portfolio risk. This means we will purchase option contracts that have an inverse relation to an equity holding or portfolio allocation. The Firm may utilize covered call, cash secured put and spread option strategies to produce a statistically based return. For example, when a client owns an individual equity, the financial advisor analyzes the equity options market and determines, if appropriate, whether to sell a covered call option to produce additional return on the individual's equity holding. A covered call is an options strategy whereby an investor holds a long position in an asset and writes (sells) call options on that same asset in an attempt to generate increased income from the asset. This is often employed when an investor has a short-term neutral view on the asset and for this reason holds the asset long and simultaneously has a short position via the option to generate income from the option premium. A covered call is also known as a "buy-write".

The Firm may also use alternative investment strategies to produce income for client's portfolio such as buying/selling put options. The cash-secured put involves writing an at-the-money or

out-of-the-money put option and simultaneously setting aside enough cash to buy the stock. The goal is to be assigned and acquire the stock below today's market price. Whether the put is assigned, all outcomes are presumably acceptable. The premium income will help the net results in any event. The investor is bullish on the underlying stock and hopes for a temporary downturn in its price. If the stock drops below the strike, the put may be assigned. That would allow the put writer to buy the stock at the strike price. The effective purchase would be even lower: strike price less the premium received. There are two principal risks. First, the stock might not only dip but plummet well below the strike price. The investor must be comfortable with the strike price as an acceptable long-term acquisition price, no matter how low the market goes.

The risk associated with these strategies may not fit all clients and therefore will only be utilized if the Firm and client determine appropriate.

We reserve the right to utilize other portfolio management strategies not mentioned above as the Firm deems appropriate on a case by case basis for the client.

We will 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, financial loss may be viewed differently by each client and may depend on many different risk items, each of which may affect the probability of adverse consequences and the magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining Copper Canyon services. These risks should be considered as possibilities, with additional regard to their actual probability of occurring and the effect on a client if there is in fact an occurrence.

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 will 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 particular securities or asset classes will 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 Copper Canyon values the securities held in client accounts 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 financial or tax planning, and in certain circumstances a client may incur taxable income on their investments without a cash distribution to pay the tax due.

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

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 that to the extent they invest in ETF securities they will 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 returns will likely 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.**

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 will cause the option contract to expire worthless.

Dynamic Active Equity Investment Model

As of 01/01/2020, Copper Canyon began management on a new portfolio investment model called the Dynamic Active Equity Model. This model is managed by Dylan Quintilone and Paul Clay. The investment model is administered through Interactive Brokers and it invests in Individual Stocks, Bond ETFs, Equity ETFs, Inverse ETFs and Equity Options. The investment model seeks to capture trading and medium-term investment opportunities. The investment models' goal is to outperform the S&P 500, while taking similar or less risk.

Dynamic Income Investment Model

As of 01/01/2020, Copper Canyon began management on a new portfolio investment model called the Dynamic Income Model. This model is managed by Dylan Quintilone and Paul Clay. The investment model is administered through Interactive Brokers client accounts and it invests in Bond ETFs, Individual Bonds, as well as other securities that may produce income via coupon, dividend or cash distributions. The investment model seeks to capture trading and medium-term investment opportunities. The investment models' goal is to produce investment income and lower volatility than equity markets.

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

Copper Canyon is not affiliated with any other financial institution. Copper Canyon is wholly owned by the Principal, Dylan Quintilone. Copper Canyon was incorporated in Orlando, Florida effective October 25th, 2016.

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

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 anticipates that, in appropriate circumstances, consistent with clients' investment objectives, it will cause accounts over which Copper Canyon has management authority to effect and may recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which Copper Canyon, its affiliates and/or clients, directly or

indirectly, may have a position of interest. Copper Canyon's employees and persons associated with Copper Canyon are required to follow the Firm's Code of Ethics. 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.**

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 in close proximity to 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 will retain records of the trade order (specifying each participating account) and its allocation, which will be completed prior to the entry of the aggregated order. Completed orders will be allocated as specified in the initial trade order. Partially-filled orders will be allocated on a pro-rata basis. Any exceptions will be documented. It is Copper Canyon's policy that the Firm will not affect any principal transactions for client accounts. Copper Canyon will also 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 broker dealer of choice is Interactive Brokers LLC. We choose this broker dealer because of their low-priced trading commissions, free stock trades and best trading execution. Although this is our preferred broker, 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 will periodically evaluate the overall reasonableness of brokerage commissions paid on client transactions by reference to such data to ensure competitive commission rates. "Best execution" means the best overall

qualitative execution, not necessarily the lowest possible commission cost. Accordingly, 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:

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.**

2. Brokerage Referrals

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

3. Directed Brokerage

All clients are serviced on a “directed brokerage basis”, where Copper Canyon will place 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 will 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 will not be 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.

B. 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 will 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. 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.

Review of Accounts - Item 13

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.

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.

C. Review Reports

The client will receive 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 will 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

A. 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.

B. 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 will be invoiced directly in arrears from Copper Canyon for the services rendered.

Client investment assets will be 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, Copper Canyon may accept limited power of attorney to act on a discretionary basis on behalf of clients. A limited power of attorney allows Copper Canyon to execute trades on behalf of clients. When such limited powers exist between Copper Canyon and the client, Copper Canyon has the authority to determine, without obtaining specific client consent, both the amount and type of securities to be bought to satisfy client account objectives. Additionally, Copper Canyon may accept any reasonable limitation or restriction to such authority on the account placed by the client. All limitations and restrictions

placed on accounts must be presented to Copper Canyon in writing. However, Copper Canyon consults with the client prior to each trade to obtain concurrence if a trading authorization has not been given.

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 will act 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. Copper Canyon does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Requirements of State-Registered Advisers - 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.

As of 02/13/2020, Dylan Quintilone, Chief Compliance Officer and Principal of Copper Canyon LLC has outside business activities. Mr. Quintilone receives compensation for stock market commentary on Seekingalpha.com. Due to the financial nature of the commentary provided, Mr. Quintilone ensures the firm's clients receive preference to the material published.

Dylan Quintilone does not receive any performance-based fees.

Copper Canyon LLC Equity Portfolio Manager, Financial Advisor and Chief Compliance Officer	October 2016 – Current
Seeking Alpha Contributor	August 2018 – Current
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
Professional Golfer	January 2011 - January 2013
Primary School	January 2006 - December 2011

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 13219 Granger Ave, Orlando, FL 32827. The telephone number is 407-864-2702. The date of this supplement is 02/13/2020.

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
Seeking Alpha Contributor	August 2018 – Current
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
Professional Golfer	January 2011 - January 2013
Primary School	January 2006 - December 2011

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 02/13/2020, Dylan Quintilone, Chief Compliance Officer and Principal of Copper Canyon LLC has outside business activities. Mr. Quintilone receives compensation for stock market commentary on Seekingalpha.com. Due to the financial nature of the commentary provided, Mr. Quintilone ensures the firm's clients receive preference to the material published. Mr. Quintilone spends between 0 to 10 hours per week creating stock market commentary for Seekingalpha.com. 0 hours are dedicated during market trading hours. Mr. Quintilone has not published stock market commentary since November 27th, 2018.

Item 5: Additional Compensation

Mr. Quintilone does receive additional compensation. He publishes stock market commentary on a website publication called Seekingalpha.com. Seekingalpha.com is a blog and stock market commentary vehicle, and Mr. Quintilone receives compensation per article contributed to the publication.

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:

13219 Granger Ave

Orlando, FL 32827

+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 13219 Granger Ave, Orlando, FL 32827. The telephone number is 407-864-2702. The date of this supplement is 02/13/2020.

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
Priority Express Parcel General Manager	2008 - Current

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 02/13/2020, 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 40 hours a week to this role and all of this time is during market hours.

Item 5: Additional Compensation

Mr. Clay does receive additional compensation. Mr. Clay receives an annual salary for his full-time role as General Manager at Priority Express Parcel.

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:

13219 Granger Ave

Orlando, FL 32827

+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.