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## **Cover Page - Item 1**

Copper Canyon LLC  
A Florida Registered Investment Advisor

Copper Canyon LLC  
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Orlando, FL 32827  
(407) 864-2702  
[www.coppercanyonllc.com](http://www.coppercanyonllc.com)

Form ADV Part 2A Brochure

February 06, 2023

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: [Ccanyonllc@gmail.com](mailto: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](http://www.adviserinfo.sec.gov). The term "Registered" does not imply a certain level of skill or training.

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## **Material Changes - Item 2**

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

### **Outside Business Activities**

Dylan Quintilone operates a tax preparation services for individuals. The business names of the tax preparation business are “Dylan Quintilone, EA” and “Quintilone Tax”. Dylan Quintilone is a credentialed tax practitioner. He maintains an Enrolled Agent designation with the Internal Revenue Service (IRS). More information about this outside business disclosure can be found in Form ADV Part 2A Brochure Requirements of State-Registered Advisers - Item 19 Page 29 and Form ADV Part 2B: Brochure Supplement Item 4: Other Business Activities Page 30, 34.

Paul Clay works within Dylan Quintilone’s tax preparation business “Dylan Quintilone, EA” and “Quintilone Tax” as an independent contractor. Mr. Clay acquires clients and renders informal tax advice. Mr. Clay is not a credentialed tax practitioner; he maintains a PTIN Preparer Tax Identification Number. More information about this outside business disclosure can be found in Form ADV Part 2A Brochure Requirements of State-Registered Advisers - Item 19 Page 29 and Form ADV Part 2B: Brochure Supplement Item 4: Other Business Activities Page 30, 34.

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

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## **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 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 itemized invoice of the fees to be paid to Copper Canyon for services rendered. The investment management fee is deducted from the client account within 7 days of the client receiving a Quarterly invoice from Copper Canyon LLC. In addition, the firm sends an invoice of the fee to be deducted to the qualified custodian. The firm maintains proper controls and records as required by the Securities and Exchange Commission and state regulators over client assets.

The firm does take discretionary authority for enacting purchases and sells within client accounts and transacting securities in the client’s best interests. The firm and it’s investment advisors receive discretionary trading authority from clients by signing a “Discretionary Trading Authorization” agreement. 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 are disclosed to the client in the unlikely event they should occur. The initial consultation, which is in person or virtual, 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, conversations, written correspondence, and the client’s previous investment experience.

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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 can 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 or desires.

## **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, arbitration 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. The Firm believes it is the mix of fixed income and equity investments that explains and produces a portfolio's rate of return and degree of fluctuations in value. The goal is to have a mix of different investment securities, so the investment portfolio could potentially lessen losses in an overall stock market decline

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We may utilize equity options or index options to hedge portfolio risk. This means we 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 investment outcomes based on statistical analysis. 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 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 and as the Firm deems appropriate on a case-by-case basis for the client.

### **Financial Planning**

As of April 22, 2021, Copper Canyon does perform Financial Planning Services. The services include budget planning, overall financial guidance and advice relating to client financial decisions. The firm does not charge clients enrolled in portfolio management services for additional financial planning services.

The firm does offer financial planning services to individuals who are not enrolled in portfolio management services. The fee charged is approximately \$200 per hour.

The financial planning service analyzes the income and expenses of an individual and sets financial goals that are achievable based on salary, discipline, and other factors. The financial planning service can provide a budget that helps clients meet their overall life goals. For retirement planning the financial plan may include financial and income projections of 401k draw down, investment income estimations and other factors to help the client analyze how long their money will last into retirement. The financial plan is tailored to each client's specific financial situation.

### **Financial Consultation**

For general financial consulting engagements, we usually do not provide our clients with a written summary of financial situation and recommendations as the process is less formal than our comprehensive financial planning service. Implementation of any financial plan or guidance is at the discretion of the client.

Hourly Consulting Fee: A flat fee of \$50.00 "Fifty US Dollars" shall be paid to our firm for consulting services.

The final fee we charge will be due to the firm within 30 days upon completion the of the specific financial consulting and advisement contained within the Financial Planning and Consulting Agreement.

Each time Copper Canyon renders a service, Copper Canyon will directly send the Client an invoice of the amount of the fee and an invoice itemizing the fee.

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Itemization includes the formula used to calculate the fee, and the time covered by the fee. The fee is charged in arrears.

### **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 January 1st, 2023, Copper Canyon LLC manages approximately \$4,321,300 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 financial planning hourly fee, consultation fee. The portfolio management fees are collected in arrears in the first week of each quarter for asset management services provided the previous quarter. We collect financial planning and consultation fees upon completion of performing the service.

As of January 1, 2018, Copper Canyon bills clients on a quarterly basis. We invoice the client on the 1<sup>st</sup> day of the month after the end of the quarter, or within 30 days of the end of the quarter. The quarterly periods are January 1<sup>st</sup> to March 31<sup>st</sup>, April 1<sup>st</sup> to June 30<sup>th</sup>, July 1<sup>st</sup> to September 30<sup>th</sup> and October 1<sup>st</sup> to December 31<sup>st</sup>.

The invoice days are April 1<sup>st</sup>, July 1<sup>st</sup>, October 1<sup>st</sup> and January 1<sup>st</sup>, or 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:



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## Assets Under Management

## Annualized Asset Based Fee Range

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\$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.

### **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 calculate client X's portfolio management fee for the 1<sup>st</sup> 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 1% 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.

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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 1<sup>st</sup> quarter portfolio management invoice.

For the benefit of discounting your asset-based fee, we may aggregate investment services 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 are detailed in your engagement agreement.

### **Financial Planning Fees**

For clients not enrolled in portfolio management services, the fee charged for financial planning services is approximately \$200 per hour.

For clients enrolled in portfolio management services, the financial planning service is included for no additional charge.

### **Consultation Fee**

We charge either on a flat fee basis for consulting services. The ultimate fee that we charge clients is based on the complexity and scope the specific financial situation we give guidance on. Our flat fees range from \$50 to \$2,500 "Fifty Dollars to Twenty-Five Hundred Dollars". The final fee we charge you will be due to the firm within 30 days upon completion of the specific financial consulting and advisement contained within the Financial Planning and Consulting Agreement.

Each time Copper Canyon renders a service, Copper Canyon will directly send the Client an invoice of the amount of the fee and an invoice itemizing the fee.

Itemization includes the formula used to calculate the fee, and the time period covered by the fee. The fee is charged in arrears.

### **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 are billed on a pro rata basis for the portion of the service performed or completed. The portfolio value at the completion of

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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 are refunded within 60 days.

### **Part B: Collection of fees**

Copper Canyon receives payments in different methods. For Portfolio Management Services 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.

For Financial Planning or Consultation clients, Copper Canyon sends an invoice through email. 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 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 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.

The types of payment Copper Canyon accept includes, direct fee deduction, checks and other cash transactions such as (electronic ACH transfer, personal check, e-check, Peer to Peer instant payment, physical cash and Zelle money transfer services).

### **Part C: Other Fees**

As of 01/03/2023 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).

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## **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 provides services primarily to individuals and trusts. Copper Canyon offers services to small businesses as well.

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 are determined by the Firm's principal. Generally, but not always, if a prospective client expresses their intent to save and build wealth through investing, Copper Canyon will waive the minimum account size of \$100,000.

## **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, conversations, written correspondence,

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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 attempt to invest client assets in the most liquid securities. These securities include individual equities "stocks", 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 under normal market situations. 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 could 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 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 has 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 up or down at the same time, while growing at a desired rate.

We may utilize equity options or index options to hedge portfolio risk or seize trading opportunities. This means we 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

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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.

In this scenario, 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 price or 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.**

**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, 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

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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,

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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 returns 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**

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**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 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**

**Part A:** Not Applicable

**Part B:** Not Applicable

**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" and "Dylan Quintilone, EA" (these names are

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doing business as names can be used interchangeably). Dylan Quintilone is 100% owner of “Dylan Quintilone, EA/Quintilone Tax”. 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” 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” 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” 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.

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At the same time, it is possible to engage “Dylan Quintilone, EA/Quintilone Tax” 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” for tax related services and engage an outside investment professional or service provider for investment related services.

**Part D:** Not Applicable

### **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’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 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

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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 dealer is Interactive Brokers LLC. We choose this broker dealer because of their low-priced trading commissions, free stock trades and 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 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:

### 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 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.

### 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 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

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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. We determined the execution provided by IBKR LITE to meet our clients best interest on a fee basis. 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](http://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.

## **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

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investment plan. Additional reviews may be triggered by material market, economic or political events.

### 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**

### 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.

Copper Canyon LLC may refer tax related matters to "Dylan Quintilone, EA/Quintilone Tax". 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" for tax services.

### 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 are invoiced directly in arrears from Copper Canyon for the services rendered.



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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 accept a limited power of attorney or Discretionary Trading Authorization Agreement to act on a discretionary basis on behalf of clients. A limited power of attorney or Discretionary Trading Authorization Agreement 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 acts in a prudent and diligent manner intended to enhance the economic value of the assets of the client's portfolio.

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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 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 as an Enrolled Agent. The business operates under the names Dylan Quintilone, EA and/or Quintilone Tax. This business is not investment related. The address of the business is 7208 W Sand Lake Rd Suite 300 Orlando, FL 32819. 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" simultaneously. Mr. Quintilone received less than 10% of his personal income from

this business in 2022. It is expected that Mr. Quintilone will receive greater than 10% of his income from this business in 2023.

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 between \$150 “one hundred and fifty dollars” to \$300 “three hundred dollars” per tax return filed. Mr. Quintilone offers federal tax debt resolution services. He offers these services for an hourly fee of \$150 “one hundred and fifty dollars” and/or a flat fee of \$2,999 “twenty-nine hundred and ninety-nine dollars”.

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.

Mr. Quintilone does not receive any performance-based fees.

Copper Canyon LLC Equity Portfolio Manager, Financial Advisor and Chief Compliance Officer	October 2016 – Current
Dylan Quintilone, Enrolled Agent & Independent Tax Preparation “Quintilone Tax” “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
Professional Golfer	January 2011 - January 2013

## **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 03/30/2022.

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](http://www.adviserinfo.sec.gov).

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**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" "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
Professional Golfer	January 2011 - January 2013

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### **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](http://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 as an Enrolled Agent. The business operates under the names Dylan Quintilone, EA and/or Quintilone Tax. This business is not investment related. The address of the business is 7208 W Sand Lake Rd Suite 305 Orlando, FL 32819. 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" simultaneously. Mr. Quintilone received less than 10% of his personal income from this business in 2022. It is expected that Mr. Quintilone will receive greater than 10% of his income from this business in 2023.

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.

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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/](http://www.dylanquintilone.com/) or [www.quintilonetax.com/](http://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" 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" 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" 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" for tax related services and not engage Copper Canyon LLC for investment related services.

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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” 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:

13219 Granger Ave

Orlando, FL 32827

+1- 407-864-2702



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### **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 03/30/2022.

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](http://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

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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” “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](http://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 1<sup>st</sup>, 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

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

Mr. Clay derives 95% 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". This business is not investment related. The address of the business is 7208 W Sand Lake Rd Suite 305 Orlando, FL 32819. This business provides tax preparation services for individuals and businesses. Mr. Clay dedicates approximately 1 to 2 hours a day 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 prepares individual tax returns to be filed with the IRS. Mr. Clay receives compensation for these services. Mr. Clay receives between \$150 "one hundred and fifty dollars" to \$300 "three hundred dollars" per tax return filed. The business website is [www.quintilonetax.com/](http://www.quintilonetax.com/). More information can be found at this web address.

Mr. Clay's compensation from Tax Preparation in 2022 was immaterial. It is expected that during 2023, tax preparation income will be less than 5% of his total annual income.

As of 03/27/2022, Paul Clay is a managing director of a family held real estate holding company. Moondust Real Estate Holding LLC. Mr. Clay does not receive compensation for this, and he dedicates no time to this activity. Mr. Clay is a 0% owner of this company.

#### **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)

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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.