

Cover Page - Item 1

Copper Canyon LLC

A Florida Registered Investment Advisor

Copper Canyon LLC

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Orlando, Florida 32801

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www.coppercanyonllc.com

Form ADV Part 2A Brochure

January 19, 2018

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 states 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 will bill clients at the minimum on a quarterly basis. We will 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 will be April 1st, July 1st, October 1st and January 1st.

For clients with 401k plans, they will be billed on a less frequent basis. The client has the choice to elect bi-annual or annual billing methods. We made this change, so clients can withdraw advisory fees from their 401k plan providers on a less frequent basis. This change will streamline payment for clients that have a 401k plan under portfolio management services.

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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 owner of Copper Canyon. Copper Canyon is strictly a fee-only financial planning and investment management firm. The firm does not sell annuities, insurance, stocks, bonds, mutual funds, 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 financial planning and investment management to individuals and small businesses. We give advice through consultation with the client and/or clients of which projections may include: determination of financial objectives, identification of financial problems, cash flow management, investment management, education funding, and retirement planning. We provide investment advice to the client, however the final decision on investment selections remains with the client. Copper Canyon will not act as a custodian of client assets. 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 clients best interests. 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 extent to which financial planning and investment management 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 the most liquid securities. These securities include ETF's, Index ETF's, Mutual Funds, 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 under \$0.05. A low bid ask spread ensures the client receives a fair transaction price.

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

Part B: Types of Advisory Services Continued Financial Planning

Copper Canyon designs and produces financial plans to help clients with all aspects of financial planning. The financial plan includes some or all of these: a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; a review of retirement accounts and plans including recommendations; one or more retirement scenarios; and education planning with funding recommendations. Copper Canyon also provides hourly planning services for clients who need advice on a limited scope of work. The Firm provides detailed investment advice and specific recommendations as part of a financial plan. It is up to the client to implement the recommendations, or not. After delivery of a financial plan, future face-to-face meetings are scheduled as necessary. Clients may implement the investment recommendations provided by Copper Canyon in a financial plan with other brokers or money managers that are not affiliated with our firm, or on their own.

Portfolio Management

Clients may choose to have Copper Canyon manage their assets to obtain ongoing portfolio management. The scope of work and fee for a Portfolio Management Agreement is provided to the client in writing prior to the start of the relationship. A management agreement includes: portfolio management and performance reporting; necessary financial planning; and assistance with the implementation of recommendations within each area.

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 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 January 19, 2018, Copper Canyon LLC manages approximately \$590,000 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 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 at the minimum on a quarterly basis. We will 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.

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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 the stated range is determined by the Firm's principals.

Accounts with assets under \$25,000 will incur a \$240 per year minimum fee.

Accounts with assets between \$25,000 - \$50,000 will be charged 1% of assets under management.

For financial planning consultations, we charge a \$200 dollar an hour research rate. This fee is collected upon completion of the service performed. All services require two-hour minimum charge. This is not negotiable.

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 30 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 financial planning 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 in arrears will be refunded within 60 days.

Part B: Collection of fees

Copper Canyon receives payments in different methods. The first service Copper Canyon invoices client directly is a monthly fee calculated 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 or standard mail and receive payments in various methods.

Copper Canyon does not manage 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 end of the prior quarter to pay the invoice 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).

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 clients 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 its employees does 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 for fee registered investment advisor.

Types of Clients - Item 7

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

There is no minimum requirement for financial consultations or financial planning.

There is a minimum account size of \$50,000 (Fifty thousand) for asset management services. We reserve the right to accept accounts under \$50,000 (Fifty thousand) in assets based on the client's age, income, and/or investment experience.

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 ETF's, index ETF's, mutual funds, 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 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 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. 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 – An account’s 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.

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 chose this broker dealer because of their low-priced trading commissions 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 account[s] at the custodian designated by the client. Further, all client accounts are traded within their respective brokerage account[s]. 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 account[s]). 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 particular 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 and William Wellings, Investment Advisor Representative 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 account[s]. 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 not hold custody of 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 blanket 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 Principals:

Dylan Quintilone CRD# 6732024

Dylan Quintilone, is a managing member Chief Executive Officer and Chief Compliance Officer of Copper Canyon LLC. Dylan Quintilone, born 1992, is involved in the day-to-day activities of the firm and oversees all company activities by having weekly meetings with firm management. Dylan Quintilone administers portfolio management and creates financial planning documents. Over the years, Dylan Quintilone has developed strong analytical skills and client relationship expertise. He acts as a financial advisor of the firm and is dedicated to advising Copper Canyon clients.

As of 1/19/2018, Dylan Quintilone, Chief Compliance Officer and Principal of Copper Canyon LLC has no outside business activities.

Dylan Quintilone does not receive any performance-based fees.

Copper Canyon LLC Chief Executive Officer, Financial Advisor and Chief Compliance Officer	October 2016 – Current
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 - Current
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
Semi 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. He conducts business at Copper Canyon's office located at 111 N Orange Ave Ste 800 Orlando, FL 32801. The telephone number is 407-864-2702. The date of this supplement is 01/19/19.

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 Chief Executive Officer of Copper Canyon LLC. He graduated from Valencia College in Orlando, FL with an Associate in Arts Degree and graduated from the University of Central Florida with a bachelors in finance. Dylan Quintilone, is involved in the day-to-day activities of the firm and oversees all company activities by having weekly meetings with the firm’s employees and management. Dylan Quintilone administers portfolio management and creates financial planning documents. Over the years, Dylan Quintilone has developed strong analytical skills and client relationship expertise. He acts as a financial advisor of the firm and is dedicated to advising Copper Canyon clients.

Copper Canyon LLC Chief Executive Officer, Financial Advisor and Chief Compliance Officer	October 2016 – Current
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
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Valencia College Associate in Arts General Studies	May 2013 - May 2015
Semi 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 1/19/2018, Dylan Quintilone, Chief Compliance Officer and Principal of Copper Canyon LLC has no outside business activities.

Item 5: Additional Compensation

Mr. Quintilone does not receive any 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:

8442 Martinson St

Orlando, FL 32827

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

William John Welling's is an Investment Advisor Representative of Copper Canyon LLC. He conducts business at Copper Canyon's office located at 111 N Orange Avenue Ste 800 Orlando, FL 32801. The telephone number is 407-864-2702. The date of this supplement is 1/19/2018.

This brochure supplement provides information about William John Wellings 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 Willam Wellings is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: Educational Background and Business Experience

William Wellings CRD# 6817834

William Wellings, born 1996, in Boca Raton, FL is a research associate involved in the day to day activities of Copper Canyon LLC. William Wellings' expected graduation date from the University of Central Florida is December 2018. He has developed a thorough understanding of financial markets through education and personal trading as well as experience with business operations and logistics while working for a startup technology company. William Wellings acts as a financial advisor and equity research associate of the firm. William has developed a strong foundation of business practices and ethics as well as has learned to perform under demanding situations. He acts as a financial advisor of the firm and is dedicated to advising Copper Canyon clients.

William Wellings does not receive any performance based fees.

Copper Canyon Research Associate	May 2017 - Current
University of Central Florida B.S.B.A. Finance	August 2015 - Current
Hailey Enterprises	February 2016 - May 2016
CRAM Investments LLC (FPVLR.com)	January 2015 - August 2015
Primary School	January 2017 – May 2015

Item 3: Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Wellings. Mr. Wellings 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. Wellings. 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. Wellings. However, we do encourage you to independently view the background of Mr. Wellings 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 6817834 in the field labeled "Individual Name or CRD Number".

Item 4: Other Business Activities

Mr. Wellings is not engaged in any outside business activities outside the scope of his investment advisory service on behalf of Copper Canyon LLC.

Item 5: Additional Compensation

Mr. Wellings does not receive any 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, William Wellings of Copper Canyon LLC serves the role of Investment Advisor Representative and in that capacity Mr. Wellings should be supervised by Dylan Quintilone, Chief Compliance Officer in 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 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 like Mr. Wellings. 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.

William Wellings Contact Information:

11018 Relaxation Loop #61

Orlando, FL 32817

561-926-2867

Item 7: Requirements for State-Registered Advisers

There are no legal, civil or disciplinary events to disclose regarding Mr. Wellings. Mr. Wellings 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. Wellings. 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. Wellings.