

**Part 2A Appendix 1 of Form ADV: Wrap Fee Program Brochure**

Form ADV, Part 2A, Item 1

***Cover Page***

**CANOPY 360 WEALTH, LLC**

**112 EAST FORT KING STREET  
OCALA, FL 34471**

**Tel: (352) 369-1120**

**Fax: (352) 351-9393**

**October 23, 2018**

**FORM ADV PART 2A APPENDIX 1  
WRAP FEE PROGRAM BROCHURE**

**This brochure provides information about the qualifications and business practices of Canopy 360 Wealth, LLC. If you have any questions about the contents of this brochure, please contact us at (352) 369-1120. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Additional information about Canopy 360 Wealth, LLC is also available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Canopy 360 Wealth, LLC is 296771.**

**Canopy 360 Wealth, LLC is a Registered Investment Adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.**

### ***Material Changes***

This disclosure brochure provides prospective clients with information about Canopy 360 Wealth, LLC that should be considered before or at the time of obtaining our advisory services.

This brochure is required to be updated at least annually, or sooner when material changes to our business take place.

Canopy 360 was established as a new Registered Investment Advisor in June 2018 under the Securities and Exchange Commission rules and regulations.

Each year we will deliver to you, by no later than April 30th, a free updated brochure that includes or is accompanied by a summary of material changes; or a summary of material changes and an offer to provide a copy of the updated brochure and how to obtain it.

Please retain a copy of this Disclosure Brochure for your records.

***Table of Contents***

<b>Services, Fees and Compensation.....</b>	<b>4</b>
<b>Account Requirements and Types of Clients.....</b>	<b>7</b>
<b>Portfolio Manager Selection and Evaluation.....</b>	<b>7</b>
<b>Client Information Provided to Portfolio Managers.....</b>	<b>11</b>
<b>Client Contact With Portfolio Managers.....</b>	<b>12</b>
<b>Additional Information.....</b>	<b>12</b>

### ***Services, Fees and Compensation***

Canopy 360 Wealth, LLC (hereinafter called “Canopy 360”) is a Registered Investment Adviser based in Ocala, Florida, and incorporated under the laws of the State of Florida. Canopy 360 is owned by Lindsay Financial Services, LLC and Powers Wealth Management, LLC, and those entities are owned by Russell Lindsay, Lance Powers and Jamie Losito. Canopy 360 is registered with the Securities and Exchange Commission and is subject to its rules and regulations. Founded in June 2018, Canopy 360 provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Our investment advice is tailored to meet our clients’ needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. Canopy 360 also provides financial planning consulting services including, but not limited to, risk assessment/management, investment planning, estate planning, financial organization, or financial decision making/negotiation.

Canopy 360, in providing the services agreed upon with the Client, may refer the Client to an unaffiliated Securities and Exchange Commission registered investment adviser (“referred advisor”) to manage all or a portion of the managed assets. The Client will be required to sign an Investment Advisory Agreement of the advisor for which Canopy 360 referred, and this authorizes the referred adviser discretionary trading authority. If this occurs, Canopy 360 will be responsible for the continuing supervision of the Client's account. Client understands that the advisory fees paid to Canopy 360 are included in the advisory fees paid to the referred adviser. Client will also be required to sign a disclosure document stating the portion of the advisory fees paid to the referred advisor and the portion paid to Canopy 360.

A “wrap fee program” for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single “wrapped” fee that is not based on the transactions in a client account. Canopy 360 provides discretionary investment advisory services to some of its clients through a managed account program (“the Wrap Fee Program”). Canopy 360 will assist clients in determining the suitability of the Wrap Fee Program for the client.

Canopy 360 offers clearing platforms to execute securities business for investment advisory services, including Wrap Fee Program services, through TD Ameritrade Institutional, a division of TD Ameritrade, Inc. Member FINRA/SIPC (“TD Ameritrade”) and Raymond James Financial, Inc.

#### ***WRAP FEE PROGRAM***

Canopy 360’s Wrap Fee Program is offered as a part of the Asset Management Services described below. Canopy 360 provides portfolio management services for this program based

on the Client's investment goals and objectives. Managed Accounts are available to primarily individuals and small businesses.

### ***Fees and Compensation***

The following types of fees will be assessed:

**Asset Management** – Fees are charged in advance and are based primarily on asset size and the level of complexity of the services provided. In individual cases, Canopy 360 has the sole discretion to negotiate fees that are lower than the standard fee shown or to waive fees. Fees are not based on the share of capital gains or capital appreciation of the funds or any portion of the funds. Comparable services for lower fees may be available from other sources. Fees for the initial month will be prorated based upon the number of calendar days in the calendar month that the advisory agreement is in effect. Fees are based on the market value of the assets on the last business day of the previous month. Annual fees range from .89% - 2.09% depending on the amount of assets under management (“AUM”) – See chart below.

Fees for asset management services of certain accounts include broker-dealer transaction costs, and because of this are considered Wrap accounts. The cost of these programs to you, if provided separately with the equivalent trading activity in the client account(s), may cost more or less than purchasing such services separately. Consulting services are included in these fees for asset management services with the exception of unique circumstances that may require a separate agreement for financial planning services (description and fees are discussed below). If the situation warrants separate financial planning fees, it will be discussed upfront and a separate agreement will be negotiated.

Fee Schedule for Asset Management with transactional costs included:

Total Account Value	Maximum Annual Advisory Fee
First \$250,000	3.09%
Next \$250,000	2.59%
Next \$500,000	2.09%
Next \$1,500,000	1.59%
Next \$2,500,000	1.09%
Additional Assets	0.84%

As authorized in the client agreement, the account custodian withdraws Canopy 360's advisory fees directly from the clients' accounts according to the custodian's policies, practices, and procedures. The custodial statement includes the amount of any fees paid to Canopy 360 for advisory services. You should carefully review the statement from your custodian/broker-dealer's statement and verify the calculation of fees. Your custodian/broker-dealer does not verify the accuracy of fees calculations.

Fees are charged in advance on a monthly basis, meaning that advisory fees for a month are charged on the first day of the month. Clients may terminate investment advisory services obtained from Canopy 360, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with Canopy 360. The client is responsible for any fees and charges incurred by the client from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, the client may terminate advisory services upon written notice delivered to and received by Canopy 360. Clients who terminate investment advisory services during a month are charged a prorated advisory fee based on the date of Canopy 360's receipt of client's written notice to terminate. The client may obtain a pro-rated refund of a pre-paid fee if the advisory contract is terminated before the end of the billing period by contacting Russell Lindsay at (352) 369-1120.

For clients that are referred to another SEC registered investment adviser, Canopy 360 will receive a flat fee of 0.50%, collected by the referred entity and paid to Canopy 360.

Financial planning services are charged in advance through a fixed fee or hourly arrangement as agreed upon between the client and Canopy 360 Wealth, LLC. There will never be an instance where \$1,200 or more in fees is charged six or more months in advance. Hourly fees are generally charged when the scope of services cannot be determined or if the services are limited to one meeting. Fixed fees are generally quoted to the client for longer term consulting projects. Fees are negotiable and vary depending upon the complexity of the client situation and services to be provided. Hourly fees range from \$200 - \$750 per hour, depending on what is negotiated between Canopy 360 and the client. Similar financial planning services may be available elsewhere for a lower cost to the client. Fixed fees for longer-term consulting projects range from \$750 to \$50,000 per project. An estimate for total hours and charges is determined at the start of the advisory relationship.

Typically, clients will be invoiced monthly for all time spent by Canopy 360 as agreed upon by client or upon completion of the services if less than a month. Clients who wish to terminate the planning process prior to completion may do so with written notice. Upon receipt of written notification, any earned fee will immediately become due and payable, and any unearned, pre-paid fee will be promptly refunded. A client may terminate an advisory agreement without being assessed any fees or expenses within five (5) days of its signing.

### **Additional Fees and Expenses**

In addition to advisory fees paid to Canopy 360 as explained above, clients are charged custodial service, account maintenance, transaction, and other fees associated with maintaining the account, however Canopy 360 pays some or all of these fees for designated Wrap Accounts. Therefore, these fees are **included** in the fee schedule above. These fees vary by broker dealer and/or custodian. Additionally, for any mutual funds purchased, the client may pay their proportionate share of the funds' distribution, internal management, investment advisory and administrative fees. Such fees are not shared with Canopy 360 and are compensation to the fund manager. Clients are urged to read the mutual fund prospectus prior to investing.

Mutual fund companies impose internal fees and expenses on clients. These fees are in addition to the costs associated with the investment advisory services as described above. Complete details of such internal expenses are specified and disclosed in each mutual fund company's prospectus. Clients are strongly advised to review the prospectus(es) prior to investing in such securities.

Clients may purchase shares of mutual funds directly from the mutual fund issuer, its principal underwriter, or a distributor without purchasing the services of Canopy 360 or paying the advisory fee on such shares (but subject to any applicable sales charges). Certain mutual funds are offered to the public without a sales charge. In the case of mutual funds offered with a sales charge, the prevailing sales charge (as described in the mutual fund prospectus) may be more or less than the applicable advisory fee. However, clients would not receive Canopy 360's assistance in developing an investment strategy, selecting securities, monitoring performance of the account, and making changes as necessary.

Form ADV, Part 2A Appendix 1, Item 5

### ***Account Requirements and Types of Clients***

Canopy 360 offers investment advisory services to individuals and small businesses. There is no minimum account size to open and maintain an advisory account.

Form ADV, Part 2A Appendix 1, Item 6

### ***Portfolio Manager Selection and Evaluation***

Canopy 360 acts as the portfolio managers for its Wrap Fee Program accounts. There are no conflicts of interest with this arrangement.

### ***Advisory Business***

Canopy 360 Wealth, LLC (hereinafter called "Canopy 360") is a Registered Investment Adviser based in Ocala, Florida, and incorporated under the laws of the State of Florida. Canopy 360 is owned by Lindsay Financial Services, LLC and Powers Wealth Management, LLC, and those entities are owned by Russell Lindsay, Lance Powers and Jamie Losito. Canopy 360 is registered with the Securities and Exchange Commission and is subject to its rules and regulations. Founded in June 2018, Canopy 360 provides investment advisory services, which may include, but are not limited to, the review of client investment objectives and goals, recommending asset allocation strategies of managed assets among investment products such as cash, stocks, mutual funds and bonds, annuities, and/or preparing written investment strategies. Our investment advice is tailored to meet our clients' needs and investment objectives. Clients may impose restrictions on investing in certain securities or types of securities (such as a product type, specific companies, specific sectors, etc.) by providing a signed and dated written notification, of which an e-mail is also an acceptable form of notification. Canopy 360 also provides financial planning consulting services including, but not limited to, risk assessment/management, investment planning, estate planning, financial organization, or financial decision making/negotiation.

Canopy 360 provides investment advisory and other financial services through its Investment Advisory Representatives ("IAR") to accounts opened with Canopy 360. Managed Accounts are available to individuals.

### *Asset Management*

Canopy 360 provides discretionary and non-discretionary investment advisory services to some of its clients through various managed accounts. Canopy 360 will assist clients in determining the suitability of the investments within the managed account(s) for the client. The IAR is compensated through a comprehensive single fee and the account may be assessed other charges associated with conducting a brokerage business. Canopy 360 and its IAR, as appropriate, will be responsible for the following:

- Performing due diligence
- Recommending strategic asset and style allocations
- Providing research on investment product options, as needed
- Providing client risk profile questionnaire
- Obtaining investment advisory contract from client with required financial, risk tolerance, suitability and investment vehicle selection information for each new account
- Performing client suitability check on account documentation, review the investment objectives and evaluate the investment vehicle selections
- Providing Firm Brochure (this document)

Canopy 360, in providing the services agreed upon with the Client, may refer the Client to an unaffiliated Securities and Exchange Commission registered investment adviser ("referred advisor") to manage all or a portion of the managed assets. The Client will be required to sign an Investment Advisory Agreement of the advisor for which Canopy 360 referred, and this authorizes the referred adviser discretionary trading authority. If this occurs, Canopy 360 will be responsible for the continuing supervision of the Client's account. Client understands that the advisory fees paid to Canopy 360 are included in the advisory fees paid to the referred adviser. Client will also be required to sign a disclosure document stating the portion of the advisory fees paid to the referred advisor and the portion paid to Canopy 360.

Canopy 360 may recommend a Wrap Fee Program for the client's account(s). A "Wrap Fee Program" for purposes of the SEC is a program under which investment advisory and brokerage execution services are provided for a single "wrapped" fee that is not based on the transactions in a client account. Canopy 360 provides discretionary investment advisory services to some of its clients through a Wrap Fee Program. Canopy 360 will assist clients in determining the suitability of the Wrap Fee Program for the client. Wrap Fee Program accounts recommended by Canopy 360 are not managed differently from non-Wrap Fee Program accounts. Because brokerage execution costs are included in the client's overall advisory fee, the client's fee may be greater than those that have accounts in non-Wrap Fee Program accounts, however fees will not exceed



the fee schedule stated in Canopy 360's Wrap Fee Brochure. All clients with Wrap Fee Program accounts will be provided with Canopy 360's Wrap Fee Brochure.

### *Financial Planning*

Canopy 360 may provide its Clients with a broad range of comprehensive financial planning, risk management, pension, estate and trust consulting services (which may include tax-related and other non-investment related matters.) These services are customized according to the specific request by the Client. The financial planning consulting services may include, but are not limited to, risk assessment/management, investment planning, estate planning, financial organization, or financial decision making/negotiation. These services are usually not provided on a continual, ongoing basis, and the advice offered by Canopy 360 may be limited and may not be comprehensive but limited in scope based on the Client's request for services. Once your financial parameters have been identified, we may prepare a recommended allocation plan that outlines what asset mix is most suitable for your unique investment expectations and risk tolerance.

As of October 19, 2018, the firm has total assets under management of \$101,133,230 that includes \$68,876,214 in Discretionary Accounts and \$32,257,016 in Non-Discretionary Accounts.

### *Performance-Based Fees and Side By Side Management*

Canopy 360 does not charge performance-based fees or participate in side-by-side management. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Performance-based fees are fees that are based on a share of capital gains or appreciation of the assets of a client. Our fees are calculated as described in Fees and Compensation section above, and are not charged on the basis of performance of your advisory account.

### *Methods of Analysis, Investment Strategies, and Risk of Loss*

Canopy 360's methods of analysis and investment strategies incorporate the client's needs and investment objectives, time horizon, and risk tolerance. Canopy 360 is not bound to a specific investment strategy for the management of investment portfolios, but rather consider the risk tolerance range of each portfolio and the risk level of each level when the account is opened. Examples of methodologies that our investment strategies may incorporate include:

**Asset Allocation** – Asset Allocation is a broad term used to define the process of selecting a mix of asset classes and the efficient allocation of capital to those assets by matching rates of return to a specified and quantifiable tolerance for risk. Asset Allocation has the potential of all the risks listed below.

**Dollar-Cost Averaging** – Dollar-cost averaging is the technique of buying a fixed dollar amount of securities at regularly scheduled intervals, regardless of the price per share. This will gradually, over time, decrease the average share price of the security. Dollar-cost averaging

lessens the risk of investing a large amount in a single investment at the wrong time. Dollar-Cost Averaging has the potential of all the risks listed below.

**Technical Analysis** – involves studying past price charts, patterns and trends in the financial markets to predict the direction of both the overall market and specific stocks. Technical Analysis has the potential of all the risks listed below.

**Long-Term Purchases** – securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. Long-Term Purchases have the potential of all the risks listed below.

**Short-Term Purchases** – securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short term price fluctuations. Short-term Purchases primarily have the potential of Market Risk, Business Risk, and Liquidity Risk as listed below.

Our strategies and investments may have unique and significant tax implications. Regardless of your account size or other factors, we strongly recommend that you continuously consult with a tax professional prior to and throughout the investing of your assets.

Investing in securities involves risk of loss that clients should be prepared to bear. Although we manage your portfolio with strategies and in a manner consistent with your risk tolerances, there can be no guarantee that our efforts will be successful. You should be prepared to bear the risk of loss.

All investments involve the risk of loss, including (among other things) loss of principal, a reduction in earnings (including interest, dividends, and other distributions), and the loss of future earnings. Regardless of the methods of analysis or strategies suggested for your particular investment goals, you should carefully consider these risks, as they all bear risks.

Canopy 360's primary goal for investing is to help the client maintain purchasing power over the long term. This may result in short term variability and loss of principal. Time horizon and risk tolerance are key determinates of the proper asset allocation. Canopy 360's approach focuses on taking appropriate risks for which clients are compensated (i.e. market risk) and seeking to limit or eliminate risks that do not provide compensation over the long term (i.e. individual stock risk or lack of portfolio risk).

Below are some more specific risks of investing:

**Market Risk.** The prices of securities in which clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by the client or an underlying fund; conditions affecting the general economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

**Management Risk.** Canopy 360's investment approach may fail to produce the intended results. If our perception of the performance of a specific asset class or underlying fund is not realized in the expected time frame, the overall performance of client's portfolio may suffer.

**Equity Risk.** Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.

**Fixed Income Risk.** The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.

**Municipal Securities Risk.** The value of municipal obligations can fluctuate over time, and may be affected by adverse political, legislative and tax changes, as well as by financial developments that affect the municipal issuers. Because many municipal obligations are issued to finance similar projects by municipalities (e.g., housing, healthcare, water and sewer projects, etc.), conditions in the sector related to the project can affect the overall municipal market. Payment of municipal obligations may depend on an issuer's general unrestricted revenues, revenue generated by a specific project, the operator of the project, or government appropriation or aid. There is a greater risk if investors can look only to the revenue generated by the project. In addition, municipal bonds generally are traded in the "over-the-counter" market among dealers and other large institutional investors. From time to time, liquidity in the municipal bond market (the ability to buy and sell bonds readily) may be reduced in response to overall economic conditions and credit tightening.

**Investment Companies Risk.** When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. Canopy 360 has no control over the risks taken by the underlying funds.

*Voting Client Securities*

Canopy 360 does not vote proxies on behalf of Client advisory accounts. At the Client's request, Canopy 360 may offer the Client advice regarding corporate actions and the exercise of proxy voting rights. If the Client owns shares of common stock or mutual funds, the Client is responsible for exercising the right to vote as a shareholder.

In most cases, the Client will receive proxy materials directly from the account custodian. However, in the event Canopy 360 receives any written or electronic proxy materials, we would forward them directly to the Client by mail, unless the Client has authorized our firm to contact you by electronic mail, in which case, Canopy 360 would forward any electronic solicitation to vote proxies.

Form ADV, Part 2A Appendix 1, Item 7

#### ***Client Information Provided to Portfolio Managers***

Canopy 360 directly provides the portfolio management services for the Wrap Fee Program accounts. As such, Canopy 360 receives all information provided by the Client through a formal Needs Analysis and consultation with the Client. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, tax planning, insurance review, investment management, education funding, retirement planning, and estate planning.

Form ADV, Part 2A Appendix 1, Item 8

#### ***Client Contact With Portfolio Managers***

There are no restrictions placed on Canopy 360's clients' ability to contact and consult with their portfolio managers.

Form ADV, Part 2A Appendix 1, Item 9

#### ***Additional Information***

##### ***Disciplinary Information***

Canopy 360 or its Principal Executive Officers have not had any reportable disclosable events in the past ten years.

##### ***Other Financial Industry Activities and Affiliations***

Canopy 360 Wealth, LLC or its IARs are not currently registered with any broker dealer.

Neither Canopy 360 nor its representatives are registered as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor.

Certain persons associated with Canopy 360 are also associated with Lindsay, Crabb & Associates, LLC, an accounting and consulting firm providing audit, compliance, tax consulting and financial planning services to clients. Canopy 360 is an affiliate and Russell Lindsay is an indirect owner of Canopy 360, as well as a partner of Lindsay, Crabb & Associates, LLC. If you require accounting and/or tax services, Canopy 360 may recommend Lindsay, Crabb & Associates, LLC. Our advisory services and compensation are separate and distinct from the services provided by Lindsay, Crabb & Associates, LLC. Our recommendation for you to use the services of Lindsay, Crabb & Associates, LLC may appear to present a conflict of interest because we have a financial incentive to recommend our affiliate's services. While we strongly believe that integrating tax and accounting services provides a value added to our investment advisory clients, you may choose to have another firm to provide these services. You are under no obligation to use our affiliate's services and may obtain comparable services through other firms.

IARs of Canopy 360 may also be licensed insurance agents. From time to time, they may offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as commissionable products can conflict with the fiduciary duties of a registered investment adviser. Canopy 360 always acts in the best interest of the client; including the sale of commissionable products to advisory clients. Clients are in no way required to implement the plan through any representative of Canopy 360 in their capacity as an insurance agent.

#### *Code of Ethics, Participation or Interest in Client Transactions and Personal Trading*

Canopy 360's Code of Ethics includes guidelines for professional standards of conduct for our Associated Persons. Our goal is to protect client interests at all times and to demonstrate our commitment to fiduciary duties of honesty, good faith, and fair dealing. All of Canopy 360's Associated Persons are expected to strictly adhere to these guidelines. Persons associated with Canopy 360 are also required to report any violations to the Code of Ethics. Additionally, the firm maintains and enforces written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about our clients or client accounts by persons associated with our firm.

Canopy 360 may buy or sell securities for itself that we also recommend to clients. In addition, the individual IARs may buy or sell the same securities for their personal and family accounts that are bought and sold for your account(s).

Canopy 360 or its IARs may have an interest or position in a certain security, which may also be recommended to the client. As these situations may present a conflict of interest, Canopy 360 has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A director, officer or employee of the advisor shall not buy or sell a security for their personal portfolio(s) where their decision is substantially derived, in whole or part, by reason of his or her employment, unless the information is also available to the investing public. No owner/employee of Canopy 360 shall prefer their own interest to that of the client.
2. The advisor maintains a list of all securities held by the company and all directors, officers, and employees. These holdings are reviewed on a quarterly basis by the principal of the firm.

3. The advisor requires that all employees must act in accordance with all applicable Federal and State regulations governing registered investment advisors.
4. The advisor will monitor any blocking of personal trades with those of clients to ensure that clients are not at a disadvantage.

Canopy 360's Code of Ethics is available to you upon request. You may obtain a copy of our Code of Ethics by contacting Russell Lindsay at (352) 369-1120.

Canopy 360 does not recommend or select other investment advisors to our clients for which we receive compensation, directly or indirectly, from those advisors, nor do we have business relationships with any other investment advisors.

#### *Review of Accounts*

Client accounts are reviewed at least quarterly by Russell Lindsay, Lance Powers or Jamie Losito, Executive Officers of the firm. Accounts are reviewed with regard to their investment policies and risk tolerance levels. All accounts at Canopy 360 are assigned to these reviewers.

All financial planning accounts are reviewed upon financial plan creation and plan delivery by one or more of the Executive Officers of the firm. There is only one level of review and that is the total review conducted to create the financial plan.

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

Each client will receive at least quarterly a written report that details the clients' account which may come from the custodian.

#### *Client Referrals and Other Compensation*

Canopy 360 does not compensate any individual or firm for client referrals, nor does Canopy 360 receive compensation for referrals made to other professional service providers.

#### *Financial Information*

Canopy 360 is not required to provide financial information to our clients because we do not require or solicit the prepayment of more than \$1,200 six or more months in advance.

Form ADV, Part 2A Appendix 1, Item 10

#### ***Requirements for State-Registered Advisors***

This section is not applicable, as the firm is registered with the Securities and Exchange Commission.