

Item 1 Cover Page

Copper Harbor Investment Advisors, LLC

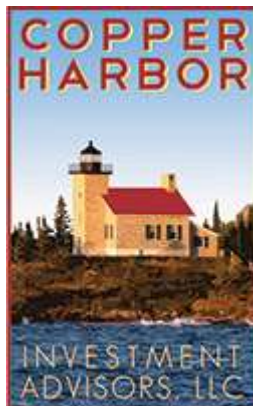
ADV Part 2A: Firm Brochure

250 North Metro Drive
Appleton, WI 54913
Phone: 920-441-0267

October 2, 2024

This Disclosure Brochure provides information about the qualifications and business practices of Copper Harbor Investment Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at 920-441-0267. The information in this Disclosure Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. Copper Harbor Investment Advisors, LLC is a Registered Investment Adviser. The registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Copper Harbor Investment Advisors, LLC (CRD #169978) is also available on the SEC's website at www.adviserinfo.sec.gov.



Item 2 Material Changes to this Brochure

This brochure has been revised to disclose updated information that has resulted from Copper Harbor Investment Advisors, LLC expanded ownership. There has been no change to the firm's existing investment advisory fees, however, more detailed retirement plan fees, resulting from expanded service, have been added. Additionally, our hourly financial planning fee has been slightly increased.

You may request a complete copy of our current Form ADV, Part 2A Brochure at any time by contacting Copper Harbor Investment Advisors, LLC at (920) 441-0267, or by requesting a Brochure via our website: www.copperharbor.us using the e-mail option.

Item 3 Table of Contents

Item 1 – Cover Page
Item 2 – Material Changes
Item 3 – Table of Contents
Item 4 – Advisory Business
Item 5 – Fees and Compensation
Item 6 – Performance-Based Fees and Side-By-Side Management
Item 7 – Types of Clients
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss
Item 9 – Disciplinary Information
Item 10 – Other Financial Industry Activities and Affiliations
Item 11 – Code of Ethics
Item 12 – Brokerage Practices
Item 13 – Review of Accounts
Item 14 – Client Referrals and Other Compensation
Item 15 – Custody
Item 16 – Investment Discretion
Item 17 – Voting Client Securities
Item 18 – Financial Information

Brochure Supplements**Item 4 Advisory Business**

Copper Harbor Investment Advisors, LLC began operations in 2014. Copper Harbor Investment Advisors, LLC provides investment advice and financial planning advice to individuals, high net worth individuals, pension and defined contribution plans, trusts, estates, charitable/non-profit entities, corporations, and other business entities. Copper Harbor Investment Advisors, LLC is not engaged in any other lines of business. Copper Harbor Investment Advisors, LLC is wholly owned by Steve N. Hooyman, Amy J. Sitter, Jesse L. Nelson, Ramon Garrido Mateos and Robert J. Moore. Copper Harbor Investment Advisors, LLC is not under common control with another firm, nor does it control any other firm. The advisory services of Copper Harbor Investment Advisors, LLC are described in detail below.

Copper Harbor Investment Advisors, LLC provides investment advice and financial planning advice through its Investment Advisor Representatives. Such Investment Advisor Representatives are known as Investment Managers and are the primary client contact person for a given relationship. Services for clients vary by both individual client and the type of investment advice requested. Copper Harbor Investment Advisors, LLC services can be divided into the broad categories of Investment Advisory Services, Retirement Plan Services and Self-Directed Accounts.

Investment Advisory Services

Copper Harbor Investment Advisors, LLC provides Investment Advisory Services which involve giving continuous advice to a client and making investments for a client based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, Copper Harbor Investment Advisors, LLC develops a client's personal investment objective statement and creates and manages a portfolio based on that policy. Copper Harbor Investment Advisors, LLC will manage advisory accounts on a discretionary basis. Account supervision is guided by the personal investment objective statement of the client. Copper Harbor Investment Advisors, LLC will also hold self-directed accounts for either retirement plan sponsored accounts or for individuals.

Copper Harbor Investment Advisors, LLC will create a portfolio consisting of the following investments: individual stocks, bonds, mutual funds, exchange traded funds (ETF's) and other investment vehicles. Copper Harbor Investment Advisors, LLC will allocate the client's assets among various investments, considering the overall risk tolerance outlined by the client. The investment vehicles will be selected based on any or all the following criteria: the performance history; investment cost structure, tax considerations, management stability, the industry sector allocation; market capitalization; mutual fund investment style; mutual fund consistency of return (standard deviation); and risk/volatility among other investment criteria that may be investment vehicle specific. Portfolio weighting will be determined by each client's individual needs and circumstances including cash flow needs, investment time horizon, Investment Policy Statement, and risk tolerance.

Clients can place reasonable restrictions or constraints on the way their accounts are managed and retain the right to modify Account restrictions at any time by providing written notice of such changes to Copper Harbor Investment Advisors, LLC. Clients will retain individual ownership of all securities.

As a rule, Copper Harbor Investment Advisors, LLC believes that investing is most successful when investors take a longer-term view defined of at least 5-7 years for more volatile investments such as stocks. Therefore, clients should not expect frequent investment changes in the portfolio particularly in periods of extreme stock market volatility. Most investment changes will be made because of the following conditions: investment allocations that deviate from the clients signed Investment Policy Statement; macro trends in the investment environment; investment vehicles that stray from original investment expectations; fundamental changes in investment vehicle structure such as changing expense structure in a mutual fund; etc.

Investments are not held by Copper Harbor Investment Advisors, LLC. Instead, all investments managed by Copper Harbor Investment Advisors, LLC are usually held at the brokerage firm ("Custodian") through which transactions are placed. Copper Harbor Investment Advisors, LLC will most often utilize the services of either Charles Schwab Institutional or Fidelity Investments who will be employed as the Custodian (holder of the assets).

Copper Harbor Investment Advisors, LLC does not assure or guarantee the results of its Investment Advisory Services; thus, losses can occur from following Copper Harbor Investment Advisors, LLC advice pertaining to any investment or investment approach, including using conservative investment strategies.

Use of Sub-Advisors

Copper Harbor Investment Advisors, LLC may recommend the use of independent investment advisors ("Sub-Advisors") to manage all or a portion of investments within a client's Account. Clients may be required to enter into a separate investment management agreement with a Sub-Advisor for services provided by a Sub-Advisor. Each Sub-Advisor is granted discretion by the client to buy and sell securities for the client's Account. Clients are encouraged to carefully review each Sub-Advisor's Form ADV disclosure brochure for service level, fee, conflicts, and professional background information applicable to each Sub-Advisor's staff before entering into the agreement.

It is important to note that even though certain Sub-Advisors may have achieved higher performance returns than others, they may not be recommended to a client by Copper Harbor Investment Advisors, LLC due to the influence of other factors, including the nature of a Sub-Advisor's investment style and time under which securities were managed to produce returns and other factors. Thus, Copper Harbor Investment Advisors, LLC may decide to select Sub-Advisors from a limited pool of firms based on objectives, manager experience, familiarity, costs, and performance, among other criteria. We do not judge performance only.

Thus, as indicated above, each client grants each Sub-Advisor limited discretionary trading authority so the Sub-Advisor can place transaction orders at will for a client's account. Each client can instruct the Sub-Advisor about investment restrictions the client would like followed during the management of the client's account. There is no restriction on a client contacting the Sub-Advisor directly to discuss portfolio issues. Each client's account is managed individually by a Sub-Advisor and is separate from other accounts managed by the Sub-Advisor. Each client receives a confirmation for each securities transaction placed by the Sub-Advisor and periodic custodian Account statements. The Client can terminate the relationship with the Sub-Advisor at any time in accordance with the separate Investment Management Agreement signed with the Sub-Advisor.

Copper Harbor Investment Advisors, LLC also provides periodic assistance in evaluating the Sub-Advisor's performance and, if necessary, recommends replacement of a Sub-Advisor when it is deemed necessary. Copper Harbor Investment Advisors, LLC does not recommend the replacement of a Sub-Advisor based on short-term performance. In the event there is meaningful change in the Sub-Advisor's investment philosophy, loss of significant investment management personnel or a change in ownership, Copper Harbor Investment Advisors, LLC will re-evaluate the Sub-Advisor to determine whether the Sub-Advisor's services or performance have changed and whether to recommend a Sub-Advisor change to a client.

Retirement Plan Services

Copper Harbor Investment Advisors, LLC provides the following service(s) to a client's retirement plan ("Plan") account.

1. Assist each client with the development of an Investment Policy Statement ("IPS"), along with investment guidelines and restrictions. Clients agree to notify Copper Harbor Investment Advisors, LLC promptly of any change in such guidelines or restrictions that might affect the IPS. Clients also agree to provide additional information as Copper Harbor Investment Advisors, LLC may request from time to time to assist it in advising its client.

2. Provide the other services described in the IPS.
3. Identify specific investment options within each asset category. If Copper Harbor Investment Advisors, LLC has been granted discretionary fiduciary authority, it will select money managers in each asset category in accordance with the IPS.
4. Monitor and report the performance of all selected investment choices.
5. Recommend changes to the investment portfolio and, if discretionary services are being provided, affect purchases and sales as it deems appropriate.
6. Review periodically the suitability of the Plan investments; and

The following additional services will be provided upon request by the client and may be subject to additional fees:

1. Conduct periodic participant education and plan-related meetings (live or web); and
2. Assist with provider review and searches, negotiation of fees; and
3. Other services mutually agreed upon by Copper Harbor Investment Advisors, LLC and the client

Plan clients are free to contact their Advisor Representative at any time, and to place restrictions on the types of securities Copper Harbor Investment Advisors, LLC may recommend for use by the Plan.

Copper Harbor Investment Advisors, LLC does not offer any service that guarantees a gain, or that a loss will not occur. All clients assume the risk that investment returns may be negative or below the rates of return achieved by other investment managers, market indices, or specific investments.

Investment Advisory accounts include all accounts except those where individual 401(k) plan participants direct the investment of their balances or clients ask for a personal non-managed account. These non-managed accounts are known as self-directed accounts.

Self-Directed Accounts

Self-Directed Accounts include all non-managed personal accounts and qualified retirement plans where individual 401(k) plan participants direct the investment of their balances. The following steps are taken with these types of clients:

1. Initial Establishment. Copper Harbor Investment Advisors, LLC works with the individual to estimate a risk profile that the investor is trying to achieve. Or in a retirement plan, sponsors determine a written Investment Policy for the plan. This Policy will usually include the types of investments to be offered to individuals/participants and other investment criteria. The objective of Copper Harbor Investment Advisors, LLC is to offer individuals/participants a broad array of investment options with varying degrees of risk.

2. Individual/Participant Interaction. Copper Harbor Investment Advisors, LLC works with the plan sponsor or individual investor to determine if investment goals are being realized. Although investment decisions are being made by the individual investor or the plan participant Copper Harbor Investment Advisors, LLC will be available for guidance.
3. Periodic Review. At least annually Copper Harbor Investment Advisors, LLC will review the account. Based upon such an evaluation, Copper Harbor Investment Advisors, LLC may open a discussion with either the plan sponsor or the individual investor based on that review. As these accounts are in fact self-directed, the criteria used to suggest changes will be at a lower level than with a fully directed account and will be made on an individual case basis.

Copper Harbor Investment Advisors, LLC does not use wrap fee programs.

Item 5 Fees and Compensation

Copper Harbor Investment Advisors, LLC is compensated utilizing a percentage of client assets for which it provides investment advice. An individual client's Investment Advisory Fee is established in the Investment Advisory Agreement with Copper Harbor Investment Advisors, LLC. Under some circumstances Copper Harbor Investment Advisors, LLC will charge an hourly or flat fee. Listed below is the current Copper Harbor Investment Advisors, LLC fee schedule.

Investment Advisory Fee Schedule. All fully managed discretionary accounts shall be subject to the following schedule based upon the market value of assets in the account.

Investment Advisory Services Annual Fees for Assets Under Management

<u>Account Size</u>	<u>Maximum Annual Fee</u>
\$0 - \$2,500,000	.95%
next 2,500,001 - \$5,000,000	.85%
next \$5,000,001 - \$10,000,000	.65%
next \$10,000,001 - \$20,000,000	.50%
Over \$20,000,001	negotiable

Mutual fund companies automatically deduct an investment advisory fee from fund assets. If you choose to invest with Copper Harbor Investment Advisors, LLC, a fee will be paid to both the mutual fund company or ETF or separately managed account and Copper Harbor Investment Advisors, LLC.

Fees for individual asset management relationships are taken in arrears and monthly. The annual rate listed above is applied to month-end account balances then divided by 12. Each monthly fee will be deducted directly from client accounts unless otherwise arranged.

Retirement plans managed by Copper Harbor Investment Advisors, LLC are not subject to the fee schedule listed above, rather, fees are negotiated and customized to the unique requests of each business entity sponsoring the retirement plan.

Retirement plans managed by Copper Harbor Investment Advisors, LLC as the fiduciary advisor, utilize a fee calculation method that values plan assets daily to determine a fee expense based on a negotiated fee schedule. At the end of each quarter, the daily valuation fees are summed to arrive at a quarterly fee amount that is withdrawn from each participant's account unless otherwise arranged. In certain circumstances an alternative payment fee arrangement can be negotiated. Special arrangements can be made to adjust the stated fee schedule for accounts that meet certain requirements or require certain services. If certain services require additional fees, the services and fees must be agreed to in writing by both parties. A non-managed asset fee arrangement is also available if Client requires only custodial services. This fee will be commensurate with the services requested but usually 50 basis points (.50%) or less.

The Custodian for your account may periodically charge for some security transactions, wire transfers or similar custodial services. Copper Harbor Investment Advisors, LLC passes these costs through to your account without mark-up or adjustment.

Special arrangements can be made to adjust the above-listed fee schedule for accounts that meet certain requirements or desire special services. If services require additional fees, these fees for additional services must be agreed to by both parties in writing. A non-managed asset fee arrangement is also available if Client requires only custodial services. This fee will be commensurate with services requested but usually 50 basis points or less.

Consulting Fees/Financial Planning Fees

Special arrangements can be made for non-standard services such as financial planning or consulting on a non-managed portfolio on an hourly basis. Fees for such a service can be on an hourly basis (ranging from \$190 to \$350 per hour depending on staff involvement) or, on a pre-arranged stated fee basis. An estimate of these special fee arrangements is available upon request.

Mutual funds and exchange traded funds automatically deduct an investment advisory fee from the fund. Additionally, some mutual funds reimburse qualified plan third party administrative firms for plan administrative fees with reimbursements known as rebates, servicing fees, and other names. Since the amount of fund rebates varies by mutual fund, and such rebates benefit qualified plan third party administrative firms, there is a potential conflict of interest for Copper Harbor Investment Advisors, LLC in the selection of mutual funds to utilize in a Plan.

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

Copper Harbor Investment Advisors, LLC does not charge any performance-based fees.

Item 7 Types of Clients

Copper Harbor Investment Advisors, LLC provides investment advice to high-net-worth individuals, pension and defined contribution plans, trusts, estates, charitable/non-profit entities, corporations and other business entities.

Copper Harbor Investment Advisors, LLC has a minimum account size guideline but does not have a minimum fee. Copper Harbor Investment Advisors, LLC recommends that clients opening accounts to utilize Investment Advisory Services have a reasonable chance of depositing at least \$500,000 of assets into the account within five years of initial establishment.

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

Copper Harbor Investment Advisors, LLC believes that each client's investment strategy should be based upon long-term historical data and the relationship between various asset categories. The main investment categories utilized are common stocks and fixed income. To a lesser extent, other categories may be utilized. Copper Harbor Investment Advisors, LLC believes that long-term client investment returns will be determined primarily upon asset allocation between the above broad categories. Copper Harbor Investment Advisors, LLC does not attempt to perform market timing when buying or selling investments but will consider current market conditions when buying or selling securities.

Copper Harbor Investment Advisors, LLC will only recommend publicly traded securities. If a client directs, Copper Harbor Investment Advisors, LLC will ask one of its custodians to hold non-public securities, however, Copper Harbor Investment Advisors, LLC will not make recommendations regarding such securities and will only hold such securities at the client's direction.

The primary basis for evaluating securities is based upon our fundamental analysis and the opinion of various national organizations engaged in the business of security evaluation. In gathering data for this fundamental analysis, Copper Harbor Investment Advisors, LLC will utilize reports prepared by third party entities whose primary business line is security evaluation. In addition, we will utilize newspapers, investment analysis services, company publications, prospectuses, annual reports, and other such public information. While we believe this investment approach will produce satisfactory long-term results, there is a risk of loss of part or all a client's principal and there is no guarantee that results will match market indices or historical returns.

Item 9 Disciplinary Information

Copper Harbor Investment Advisors, LLC must disclose any legal or disciplinary events material to your evaluation of Copper Harbor Investment Advisors, LLC, or the integrity of Copper Harbor Investment Advisors, LLC management. Copper Harbor Investment Advisors, LLC has no legal or disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

Copper Harbor Investment Advisors, LLC is 100% employee-owned by Steven N. Hooyman, Amy J. Sitter, Jesse L. Nelson, Ramon Garrido Mateos and Robert Moore. Neither Mr. Hooyman, Ms. Sitter, Mr. Nelson, Mr. Mateos nor Mr. Moore is employed by or does not operate any other businesses or organizations.

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

Copper Harbor Investment Advisors, LLC maintains a Code of Ethics Policy that outlines a standard of conduct to be upheld by employees. The code requires employees to act in a fiduciary manner in all client dealings. It requires honesty and the client's best interest in all transactions.

Copper Harbor Investment Advisors, LLC does not allow related persons or entities to buy or sell securities to or from client accounts.

Within 20 days following the end of each calendar quarter, each Investment Advisor Representative shall report to the Copper Harbor Investment Advisors, LLC Chief Compliance Officer, all security transactions in an account where the employee has direct or indirect control. Transaction information should include security name, date, buy or sell, number of shares, price and broker utilized. Such trades are reviewed against similar trades made in client accounts to determine that they were made to not affect market prices paid by clients.

Copper Harbor Investment Advisors, LLC also maintains a Personal Trading Policy that governs the personal securities trading of Copper Harbor Investment Advisors, LLC employees, who are permitted, under certain conditions, to buy and sell securities that Copper Harbor Investment Advisors, LLC also recommends to clients. Copper Harbor Investment Advisors, LLC employees who have access to non-public information regarding any client purchase or sale of securities, portfolio holdings, or recommendations are required to periodically report personal securities transactions and holdings to Copper Harbor Investment Advisors, LLC Chief Compliance Officer. Employees who have access to non-public information regarding client transactions or portfolio holdings are expected to purchase or sell a security for their personal accounts only after client trading of that same security has been completed in the client's Account. Such employees are also required to obtain advanced approval before executing certain trades within their personal accounts, such as transactions in initial public offerings, and private placement offerings.

The Code of Ethics also includes provisions relating to maintaining the confidentiality of client information, a prohibition on trading on inside information, a prohibition of rumor mongering, 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. Copper Harbor Investment Advisors, LLC maintains a Gifts and Entertainment Policy, whereby employees are generally prohibited from receiving (or giving) any gift, gratuity, hospitality or other offering of more than de minimis value, defined as \$500 annually, from (to) any person or entity doing business with the firm. This prohibition generally excludes items or events where the employee has reason to believe there is a legitimate business purpose, such as a dinner or a sporting event, of reasonable value and frequency, where a representative of the company providing the business entertainment is present. Copper Harbor Investment Advisors, LLC values its relationships with clients and others doing business with the firm, including sub-advisors Copper Harbor Investment Advisors, LLC recommends to its clients. These relationships may result in periodic gifts provided or received by Copper Harbor Investment Advisors, LLC employees in the ordinary course of business. As a practical matter, it would be difficult to establish working relationships with clients and others without periodic gifts being exchanged. While the acceptance of any gift by a Copper Harbor Investment Advisors, LLC employee may be viewed as a conflict, the Gifts and Entertainment Policy is designed to provide reasonable assurance that gifts received are not of a material nature to impact a Copper Harbor Investment Advisors, LLC employee's judgment in working with clients and others doing business with the firm.

In addition to the Copper Harbor Investment Advisors, LLC Code of Ethics Policy, Investment Managers who hold professional designations (i.e., CFP; CTFA and/or CFA) are also required to follow the code of ethics for those organizations.

Item 12 Brokerage Practices

Copper Harbor Investment Advisors, LLC recommends custodians and/or broker dealers for its clients. These recommendations are based upon experience with the entity, execution of transactions, commission schedules, administrative ease of operation, and services provided.

Copper Harbor Investment Advisors, LLC does not have any contracts in place that require minimum numbers of trades, dollar amounts, or other such business requirements with custodians. As part of each Custodian's program, Copper Harbor Investment Advisors, LLC receives benefits that it would not receive if it did not offer investment advice using the Custodians. These benefits include the following products and services, provided to Copper Harbor Investment Advisors, LLC without cost or at a discount: duplicate client statements and confirmations, research related products and tools, consulting services, access to a trading desk serving Representatives, access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares directly to or from client accounts), the ability to have advisory fees deducted directly from client accounts, access to an electronic communications network for client order entry and account information, access to mutual funds with no transaction fees, and discounts or no fees on compliance, marketing, research, technology, and practice management products and services provided by third-party vendors. The Custodians may also pay for business consulting, professional services, and research received by Copper Harbor Investment Advisors, LLC representatives and may also pay or reimburse expenses (travel, lodging, meals, and entertainment expenses) for Copper Harbor Investment Advisors, LLC personnel to attend conferences or meetings relating to their service platforms or to their advisor custody and brokerage services. Some of these products and services made available by the Custodians may benefit Copper Harbor Investment Advisors, LLC, but may not benefit its clients. Such other services made available by the Custodians are intended to help Copper Harbor Investment Advisors, LLC manage and further develop its business enterprise, and such services may or may not depend on the amount of brokerage transactions directed to them.

Clients should be aware that the receipt of economic benefits by Copper Harbor Investment Advisors, LLC described above, in and of itself, creates a potential conflict of interest and may directly or indirectly influence Copper Harbor Investment Advisors, LLC recommendations for those custodians for custody and brokerage service.

Thus, the receipt of these services creates an incentive and conflict of interest for Copper Harbor Investment Advisors, LLC when it recommends any Custodian's services.

Item 13 Review of Accounts

Copper Harbor Investment Advisors, LLC has a formal review process whereby accounts are periodically reviewed by Copper Harbor Investment Advisors, LLC on a regular basis. The client's current investments and account allocation are compared to the client's Investment Policy Statement. Copper Harbor Investment Advisors, LLC may institute changes to the portfolio based upon its review.

Clients receive monthly or quarterly statements from their custodian. These statements show current holdings, activity in the account, beginning and ending account values along with changes in account values. In addition to custodian provided statements, some clients may receive periodic statements produced by Copper Harbor Investment Advisors, LLC which may include a rate of return calculation.

Item 14 Client Referrals and Other Compensation

Copper Harbor Investment Advisors, LLC may receive referrals from many sources including existing clients and other service professionals. These referrals are made without compensation to the source.

Item 15 Custody

Copper Harbor Investment Advisors, LLC does not take possession of the assets, rather they are held by a custodian. The custodian will send clients either monthly or quarterly statements. Copper Harbor Investment Advisors, LLC urges clients to carefully review such statements and compare such custodial records to the account statements that Copper Harbor Investment Advisors, LLC may provide to clients.

Item 16 Investment Discretion

The Investment Advisory Agreement with Copper Harbor Investment Advisors, LLC gives Copper Harbor Investment Advisors, LLC the ability to buy and sell securities in the client's account without first consulting the client called discretionary authority. In exercising its investment discretion with client accounts, Copper Harbor Investment Advisors, LLC takes into consideration the client's written investment objective and how such security purchases and sales will help the client meet his/her Investment Objective Statement.

Under circumstances agreed to by the client and Copper Harbor Investment Advisors, LLC, the client may request that Copper Harbor Investment Advisors, LLC purchase, sell or hold certain securities directed by the client in a non-managed account. If these accounts are within sound investment principles with investments available through the elected custodian, Copper Harbor Investment Advisors, LLC will try to honor such requests. These non-managed/directed accounts are not the norm but are available by prearranged agreement only.

Item 17 Voting Client Securities

Unless the client requests in writing that Copper Harbor Investment Advisors, LLC vote company proxies, Copper Harbor Investment Advisors, LLC will have no obligation or authority to vote in proxy matters. If the client delegates voting authority to Copper Harbor Investment Advisors, LLC, the voting policy of Copper Harbor Investment Advisors, LLC will be to vote with managements and Board of Directors' recommendations unless such recommendations are determined to reduce long-term shareholder value. Copper Harbor Investment Advisors, LLC also generally votes against expansion of a Board of Director's power, unless Copper Harbor Investment Advisors, LLC determines such expanded power will benefit shareholders of the company. In general, when Copper Harbor Investment Advisors, LLC believes the company's management is acting in a manner inconsistent with its clients' best interests, Copper Harbor Investment Advisors, LLC shall vote against management's recommendations.

Item 18 Financial Information

Copper Harbor Investment Advisors, LLC does not require prepayment of fees, nor has it been the subject of bankruptcy proceedings and therefore has no financial disclosures to list.

Privacy Policy

Copper Harbor Investment Advisors, LLC Annual Privacy and Disclosure Policy Notice Regarding Non-Public Personal Information

Copper Harbor Investment Advisors, LLC' goal is to protect privacy. We understand that confidentiality is key in any financial relationship and have always taken very seriously our responsibility to protect your privacy by keeping information secure and confidential. This notice is being provided in accordance with legislation which requires that all clients be made aware of Copper Harbor Investment Advisors, LLC' processes for collecting, using, disclosing, and protecting information.

Types of Nonpublic Personal Information Collected

Copper Harbor Investment Advisors, LLC collects nonpublic personal information about you that is provided to us by you or obtained by us with your authorization via applications, surveys, or other forms. This information could include, but is not limited to, your name, address, social security number, and income. We also collect information regarding your transactions and account experience with Copper Harbor Investment Advisors, LLC, such as your account balance, account activity, and usage of assorted services.

Parties to Whom Copper Harbor Investment Advisors, LLC Discloses Information - "Related Entities"

For current and former clients, we do not disclose any nonpublic personal information obtained in the course of business except as required or permitted by law. Permitted disclosures include, for instance, providing information to our employees; and to related entities of Copper Harbor Investment Advisors, LLC, when services are being performed for you by one or more of those entities; and in limited situations, to unrelated third parties who need to know that information to assist Copper Harbor Investment Advisors, LLC in providing requested or authorized services to you. In all such situations, the confidential nature of the information being shared is stressed.

Protecting the Confidentiality and Security of Current and Former Clients' Information

Copper Harbor Investment Advisors, LLC retains records relating to professional services that we provide so that we are better able to assist you with your financial needs, and in some cases, to comply with professional guidelines. To guard your nonpublic personal information, we maintain physical, electronic, and procedural safeguards that comply with our professional standards.

As a registered investment advisory firm, Copper Harbor Investment Advisors, LLC annually updates and files a Form ADV. You may receive a free copy of our latest Form ADV Part II by calling our office. Please call Steve Hooyman at (920) 441-0267 if you have any questions on this privacy policy, our latest Form ADV Part II, or any other financial issue. Your privacy, our professional ethics, and the ability to provide you with quality financial services are especially important to us.

Part 2B of Form ADV: Brochure Supplement

Item 1

Steven N. Hooyman, MBA, CFP®
Copper Harbor Investment Advisors, LLC
250 North Metro Drive
Appleton, WI 54913
(920) 441-0267

This brochure supplement provides information about Steven N. Hooyman that supplements the Copper Harbor Investment Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Steve Hooyman at (920) 441-0267 if you did not receive Copper Harbor Investment Advisors, LLC's brochure or if you have questions about this supplement's contents.

Additional information about Steven N. Hooyman is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2

Educational Background and Business Experience

Mr. Hooyman received his undergraduate and graduate degrees from the University of Wisconsin – Eau Claire in 1982 and 1985. Hooyman began his investment and finance career in 1986 at Schenck & Associates. He managed Trust Services for First Wisconsin Bank for Northeast Wisconsin from 1989 to 1998. Between 1998 and 2013 Mr. Hooyman was Chief Investment Officer for Schenck Investment Solutions and Baker Tilly Investment Advisors during respective periods. Mr. Hooyman has held a Certified Financial Planner (CFP®) designation since 1987.

The CFP® certification is granted by Certified Financial Planners Board of Standards, Inc. The certification is voluntary; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and several other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.

- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.
- Experience - Complete at least three years of full-time financial planning-related experience (or equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interest of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

Mr. Hooyman has had no disciplinary events to report.

Item 4 Other Business Activities

Mr. Hooyman is not actively engaged in any other investment-related business or other occupation beyond his work at CHIA.

Item 5 Additional Compensation

Mr. Hooyman does not provide advisory services for economic benefit or compensation to anyone beyond his clients at CHIA.

Item 6 Supervision

Mr. Hooyman is an owner of Copper Harbor Investment Advisors, LLC. He is also the Chief Compliance Officer. As such, Mr. Hooyman is responsible for his supervision and that of all Copper Harbor Investment Advisors, LLC investment adviser representatives. You may contact Steve Hooyman at (920) 441-0267.

Part 2B of Form ADV: Brochure Supplement

Item 1

Amy J. Sitter, CTFA

Copper Harbor Investment Advisors, LLC
250 North Metro Drive
Appleton, WI 54913
(920) 441-0268

This brochure supplement provides information about Amy J. Sitter that supplements the Copper Harbor Investment Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Steve Hooyman at (920) 441-0267 if you did not receive Copper Harbor Investment Advisors, LLC's brochure or if you have questions about this supplement's contents.

Additional information about Amy J. Sitter is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2

Educational Background and Business Experience

Ms. Sitter received her undergraduate bachelor's degree in finance from Miami University in Oxford, Ohio in 1986. Sitter began her trust and investment career in 1986 at the Toledo Trust Company, Toledo, Ohio. She has since been a Vice President and Trust Officer for Firststar Bank (currently US Bank) from 1989-2003, as well as a Senior Investment Advisor at Baker Tilly Wealth Management from 2003-2013. Her most recent position prior to Copper Harbor Investment Advisors is as Vice President of the Private Client Group for US Bank from 2013-2016. Ms. Sitter has held the Certified Trust & Financial Advisor designation from the American Bankers Association since 1994.

The Certified Trust & Financial Advisor, CTFA, designation is granted by the American Bankers Association (ABA) through its subsidiary, the Institute of Certified Bankers (ICB). The certification is voluntary; no federal or state law or regulation requires trust and wealth management professionals to obtain the certification. It is recognized in the trust and financial services industry for the higher level of overall competence, as well as the holder's commitment to the industry to stay knowledgeable of recent industry trends, regulations and developing options for clients.

To attain the CTFA designation an individual must satisfactorily fulfill the following requirements:

- Education - Complete the ABA National Trust School, and ABA Graduate Trust School (Level 1 & 2), or ABA Wealth Management and Trust Online Training Courses and ABA CTFA Online Review Course, or other ICB approved wealth management training programs including the Cannon Financial Institute Trust Schools. The CTFA subject areas include

Fiduciary & Trust Activities, Financial Planning, Tax Law & Planning, Investment Management as well as ethics.

- Experience – Three years minimum of wealth management experience.
- Examination – Pass the CTFA Exam, which is a pass/fail exam administered in one day and covers the areas of Fiduciary & Trust Activities, Financial Planning, Tax Law & Planning, Investment Management and Ethics.
- Ethics – Sign the ICB's Professional Code of Ethics Statement, which is a requirement of each CTFA candidate.

Individuals who become certified must complete the following ongoing education requirements to maintain the right to use the CTFA designation:

- Continuing Education – CTFA's must complete 45 credits of continuing education within a three-year CE (Continuing Education) cycle with a minimum in the following five knowledge areas: 6 hours Fiduciary; 6 hours Financial Planning; 6 hours Tax; 6 hours Investments; 3 hours Ethics.

Item 3 Disciplinary Information

Ms. Sitter has had no disciplinary events to report.

Item 4 Other Business Activities

Ms. Sitter is not actively engaged in any other investment-related business or other occupation beyond her work at CHIA.

Item 5 Additional Compensation

Ms. Sitter does not provide advisory services for economic benefit or compensation to anyone beyond her clients at CHIA.

Item 6 Supervision

Steve Hooyman is an owner of Copper Harbor Investment Advisors, LLC. He is also the Chief Compliance Officer. Mr. Hooyman is responsible for Ms. Sitter's supervision and that of all Copper Harbor Investment Advisors, LLC investment adviser representatives. You may contact Steve Hooyman at (920) 441-0267.

Part 2B of Form ADV: Brochure Supplement

Item 1 **Jesse L. Nelson, MBA, CFP[®]**
Copper Harbor Investment Advisors, LLC
250 North Metro Drive
Appleton, WI 54913

This brochure supplement provides information about Jesse L. Nelson that supplements the Copper Harbor Investment Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Steve

Hooyman at (920) 441-0267 if you did not receive Copper Harbor Investment Advisors, LLC's brochure or if you have questions about this supplement's contents.

Additional information about Jesse L. Nelson is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2

Educational Background and Business Experience

Mr. Nelson received his undergraduate degree from the University of Wisconsin Stevens Point in 1997 and his graduate degree (MBA) from the University of Wisconsin Oshkosh in 2005. Nelson began his investments and finance career at Schenck & Associates in 2005 where he developed and implement investment portfolios and investment strategies for one of the state's largest accounting firms. In 2015 Nelson was offered an opportunity to expand his trust and investment skills as a Vice President - Trust Officer for Associated Bank in Neenah, WI.

In 2016 Nelson became the Director of Wealth Management for KerberRose Wealth Management - a division of KerberRose SC. Mr. Nelson has held a Certified Financial Planner CFP® designation since 2011. In 2019 Mr. Nelson joined Copper Harbor Investment Advisors, LLC.

The CFP® certification is granted by Certified Financial Planners Board of Standards, Inc. The certification is voluntary; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and several other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 62,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning.
- Examination - Pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.
- Experience - Complete at least three years of full-time financial planning-related experience (or equivalent, measured as 2,000 hours per year); and
- Ethics - Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Standards of Professional Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interest of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3 Disciplinary Information

Mr. Nelson has had no disciplinary events to report.

Item 4 Other Business Activities

Mr. Nelson is not actively engaged in any other investment-related business or other occupation beyond his work at CHIA.

Item 5 Additional Compensation

Mr. Nelson does not provide advisory services for economic benefit or compensation to anyone beyond his clients at CHIA.

Item 6 Supervision

Steve Hooyman is an owner of Copper Harbor Investment Advisors, LLC. He is also the Chief Compliance Officer. Mr. Hooyman is responsible for Mr. Nelson's supervision and that of all Copper Harbor Investment Advisors, LLC investment adviser representatives. You may contact Steve Hooyman at (920) 441-0267.

Part 2B of Form ADV: Brochure Supplement

Item 1 **Ramon Garrido Mateos, Financial Advisor**

Copper Harbor Investment Advisors, LLC
250 North Metro Drive
Appleton, WI 54913

This brochure supplement provides information about Ramon Garrido Mateos that supplements the Copper Harbor Investment Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Steve Hooyman at (920) 441-0267 if you did not receive Copper Harbor

Investment Advisors, LLC's brochure or if you have questions about this supplement's contents.

Additional information about Ramon Garrido Mateos is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Educational Background and Business Experience

Ramon received his bachelor's degree with a dual major of Finance and Spanish from the University of Wisconsin - Green Bay in 2013. Ramon began his career in the retail side at Associated Bank in 2013 and transferred to their Trust Department to begin work with client accounts. In 2017, Ramon received an offer to work with KerberRose Wealth Management to continue more direct work with client account portfolios. During his time at KerberRose, Ramon built individualized investment portfolios based on client goals, cash flow needs and tolerance for risk. Ramon also created individualized financial plans for clients. Ramon is now a financial advisor at Copper Harbor Investment Advisors LLC, since January of 2019. Ramon's background history includes retail banking, financial planning, investment management, Investment asset allocation, as well as trust & fiduciary services.

Item 3 Disciplinary Information

Mr. Mateos has had no disciplinary events to report.

Item 4 Other Business Activities

Mr. Mateos is not actively engaged in any other investment-related business or other occupation beyond his work at CHIA.

Item 5 Additional Compensation

Mr. Mateos does not provide advisory services for economic benefit or compensation to anyone beyond his clients at CHIA.

Item 6 Supervision

Steve Hooyman is an owner of Copper Harbor Investment Advisors, LLC. He is also the Chief Compliance Officer. As such, Mr. Hooyman is responsible for Mr. Mateos' supervision as well as that of all Copper Harbor Investment Advisors, LLC investment adviser representatives. You may contact Steve Hooyman at (920) 441-0267.

Part 2B of Form ADV: Brochure Supplement

Copper Harbor Investment Advisors, LLC
250 North Metro Drive
Appleton, WI 54913

This brochure supplement provides information about Robert J. Moore that supplements the Copper Harbor Investment Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Steve Hooyman at (920) 441-0267 if you did not receive Copper Harbor Investment Advisors, LLC's brochure or if you have questions about this supplement's contents.

Additional information about Robert J. Moore is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2

Educational Background and Business Experience

Robert J. Moore is an experienced individual and institutional portfolio management advisor with investment oversight for Retirement Plan Services, Individual, and Foundation/Endowment accounts. Robert attended St. Norbert College completing his bachelor's degree in accounting and additionally obtain his Master of Business Administration in Finance from Lakeland University. Before Copper Harbor Investment Advisors LLC, Robert worked for Associated Trust Company and Nicolet Wealth Management.

Experience

- Vice President, Nicolet National Bank Wealth Management
- Assistant Vice President, Associated Bank Wealth Management
- Fiduciary Retirement Plan Services
- Endowment and Foundation Asset Management
- Individual Portfolio Customization
- Investment Research and Manager Due Diligence

Education and Designations

- BA in Accounting - St. Norbert College
- MBA in Finance - Lakeland University
- Chartered Retirement Plans Specialist

The Chartered Retirement Plans Specialist or CRPS® program, is a designation program for financial professionals. This program provides experienced advisors who are focused on retirement plans with the knowledge to recommend implementation techniques that can be executed into well-structured, company-appropriate retirement plans. The Chartered Retirement Plans Specialist program covers types and characteristics of retirement plans, including IRA's, small business retirement plans, defined contribution plans, nonprofit plans, 401(k) and 403(b) plans, and government plans.

Item 3

Disciplinary Information

Mr. Moore has had no disciplinary events to report.

Item 4

Other Business Activities

Mr. Moore is not actively engaged in any other investment-related business or other occupation beyond his work at CHIA.

Item 5

Additional Compensation

Mr. Moore does not provide advisory services for economic benefit or compensation to anyone beyond his clients at CHIA.

Item 6

Supervision

Steve Hooyman is an owner of Copper Harbor Investment Advisors, LLC. He is also the Chief Compliance Officer. Mr. Hooyman is responsible for Mr. Moore's supervision and that of all Copper Harbor Investment Advisors, LLC investment adviser representatives. You may contact Steve Hooyman at (920) 441-0267.

Part 2B of Form ADV: Brochure Supplement

Item 1

Miranda R. Hoffman, CFP[®], CTFA[™]

Copper Harbor Investment Advisors, LLC
250 North Metro Drive
Appleton, WI 54913

This brochure supplement provides information about Miranda R. Hoffman that supplements the Copper Harbor Investment Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Steve Hooyman at (920) 441-0267 if you did not receive Copper Harbor Investment Advisors, LLC's brochure or if you have questions about this supplement's contents.

Additional information about Miranda R. Hoffman is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2

Educational Background and Business Experience

Mrs. Hoffman received her undergraduate degree from the University of Wisconsin – Eau Claire in 2020. Hoffman began her investment and finance career in 2019 at Edward Jones as a Financial Advisor Intern. In 2020, she continued her learning as an Operations intern at Orgel Wealth Management. In 2020, Hoffman started her full-time career in finance as a Wealth Management Trainee at Associated Bank. In 2021, she was promoted into the Trust Department, where she started as an Associate Vice President, Fiduciary Officer and ended her career at there as a Vice President, Fiduciary Officer & Wealth Planner in 2024. Mrs. Hoffman has held her Certified Financial Planner (CFP[®]) designation and Certified Trust & Fiduciary Advisor (CTFA[™]) since 2023. In 2024, Mrs. Hoffman joined Copper Harbor Investment Advisors, LLC.

The CFP® certification is granted by Certified Financial Planners Board of Standards, Inc. The certification is voluntary; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and several other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 101,000 individuals have obtained CFP® certification in the United States.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education - Complete an advanced college-level course of study or complete a CFP Board Registered Program addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor's degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include professional conduct and regulation, general principal of financial planning, risk management and insurance planning, investment planning, tax planning, retirement savings and income planning, estate planning, and psychology of financial planning.
- Examination - Pass the comprehensive CFP® Certification Examination. The 170 question examination, administered in two 3-hour sessions over one day, includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances.
- Experience - Complete at least three years of professional experience in financial planning-related experience (or equivalent, measured as 2,000 hours per year) or complete two years of apprenticeship experience (or equivalent, measured as 2,000 hours per year) with additional requirements including direct supervision of a CFP® professional; and
- Ethics - Agree to be bound by CFP Board's *Codes of Ethics and Standards of Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to maintain the right to continue to use the CFP® marks:

- Continuing Education - Complete 30 hours of continuing education hours every two years, including two hours on the *Codes of Ethics and Standards of Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics - Renew an agreement to be bound by the *Codes of Ethics and Standards of Conduct*. The Standards prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interest of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to the CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

The Certified Trust & Fiduciary Advisor, CTFA™, designation is granted by the American Bankers Association (ABA). The certification is voluntary; no federal or state law or regulation requires trust and wealth management professionals to obtain the certification. It is recognized in the trust and financial services industry for the higher level of overall competence, as well as the holder's

commitment to the industry to stay knowledgeable of recent industry trends, regulations and developing options for clients.

To attain the CTFA designation an individual must satisfactorily fulfill the following requirements:

- Education - Complete the ABA National Trust School, and ABA Graduate Trust School (Level 1 & 2), or ABA Wealth Management and Trust Online Training Courses and ABA CTFA Online Review Course, or other ICB approved wealth management training programs including the Cannon Financial Institute Trust Schools. The CTFA subject areas include Fiduciary & Trust Activities, Financial Planning, Tax Law & Planning, Investment Management as well as ethics.
- Experience – Three years minimum of wealth management experience.
- Examination – Pass the CTFA Exam, which is a pass/fail exam administered in one day and covers the areas of Fiduciary & Trust Activities, Financial Planning, Tax Law & Planning, Investment Management and Ethics.
- Ethics – Sign the ABA's Professional Certifications' Code of Ethics Statement, which is a requirement of each CTFA candidate.

Individuals who become certified must complete the following ongoing education requirements to maintain the right to use the CTFA designation:

- Continuing Education – CTFA's must complete 45 credits of continuing education within a three-year CE (Continuing Education) cycle with a minimum in the following five knowledge areas: 6 hours Fiduciary; 6 hours Financial Planning; 6 hours Tax; 6 hours Investments; 3 hours Ethics.

Item 3 Disciplinary Information

Mrs. Hoffman has had no disciplinary events to report.

Item 4 Other Business Activities

Mrs. Hoffman is not actively engaged in any other investment-related business or other occupation beyond his work at CHIA.

Item 5 Additional Compensation

Mrs. Hoffman does not provide advisory services for economic benefit or compensation to anyone beyond his clients at CHIA.

Item 6 Supervision

Steve Hooyman is an owner of Copper Harbor Investment Advisors, LLC. He is also the Chief Compliance Officer. Mr. Hooyman is responsible for Mrs. Hoffman supervision and that of all Copper Harbor Investment Advisors, LLC investment adviser representatives. You may contact Steve Hooyman at (920) 441-0267.