

We are Copper Place Global Capital LLC, an investment adviser registered with the Securities and Exchange Commission. Investment advisory and brokerage services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals' registration information are also publicly available on the [Investor.gov](https://www.investor.gov) website.

### What investment services and advice can you provide me?

We offer portfolio management services as a sub-adviser to third-party investment advisers. Retail investors may access our services solely through a third-party investment adviser approved to conduct business on a particular custodian investment advisory platform. We offer advice on investments such as equity securities, real estate investment trusts ("REITs"), preferred securities, and American depository receipts ("ADRs"). Our services are generally provided on a discretionary basis, which means that we have the power to buy and sell securities for your account without your prior consent. This authority is usually unlimited and remains in effect until you revoke it. We may provide advice on proprietary investment products.

We also advise on an exchange-traded fund, GDVD. As a policy matter, we do not use it in our managed portfolios.

We provide continuous and regular supervision of advisory client assets as part of our standard service to you. In addition, we will conduct ad hoc reviews based upon significant market and economic events.

We require a minimum account size of \$100,000, which can be waived at our discretion.

**Please visit the [Adviserinfo.sec.gov](https://www.adviserinfo.sec.gov) website for additional information on our firm. Select PART 2 BROCHURES and reference Items 4, 7, and 8 of our Part 2A Brochure for additional information on our services, investment advice, and account requirements.**

#### Other Questions You May Have

*Given my financial situation, should I choose an investment advisory service? Why or why not?*

*How will you choose investments to recommend to me?*

*What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

### What fees will I pay?

Our asset-based fees are calculated as a percentage of the assets under our management, so our fees will rise and fall with the value of the assets we manage for clients. As a result, we are economically incented to recommend that you place more assets in your account in order to increase the value of your portfolio, because as the value increases, so do our fees.

In addition to our fees, you may be charged transaction or asset-based fees by your custodian for its services. These fees vary depending on the custodian. Under a transaction fee arrangement, the more transactions effected in your account, the more fees you will pay, and high activity in your account does not assure positive portfolio performance. For custodians that charge their fees based upon a percentage of your assets, such fees may be more than would be the case if you are charged a transaction-based fee. Please be mindful of the effect of your portfolio size, the level of activity, and the rate of custodian asset-based pricing. Generally, large portfolios would be disadvantaged by paying an asset-based custodian fee versus a transaction-based fee. Some securities, such as ETFs, carry additional costs.

There are additional fees such as internal fees and expenses charged by mutual funds (i.e., 12b-1 distribution fees and management fees that are assessed within the mutual fund) and exchange-traded funds, client-facing investment adviser fees, ADR fees such as currency conversion fees and custody fees for the issuance of ADRs, postage and handling, transfer taxes, SEC fees for sales of securities.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. **You can find more information about our fees and costs under Item 5 of our Part 2A Brochure, available at [Adviserinfo.sec.gov](https://www.adviserinfo.sec.gov).**

#### Other Questions You May Have

*Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

## **What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

*When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here is an example to help you understand what this means:*

- We manage a registered ETF and have an economic interest to favor our registered fund over separately managed account clients. We mitigate this risk through a trade rotation policy designed to ensure that all Copper Place clients are treated equitably over time.

**Additional information regarding conflicts of interest can be found in Items 5, 10, 11, and 12 of our Part 2A Brochure, available at [Adviserinfo.sec.gov](https://adviserinfo.sec.gov).**

### **Other Questions You May Have**

*How might your conflicts of interest affect me, and how will you address them?*

## **How do your financial professionals make money?**

Our financial advisors are paid either a percentage of the fees we collect from you or a salary and bonus. We are incentivized to recommend that you add additional assets to your advisory account. We do not receive non-cash compensation.

## **Do you or your financial professionals have legal or disciplinary history?**

No. You can visit [Investor.gov/CRS](https://Investor.gov/CRS) for a free and simple search tool to research our firm and financial professionals.

### **Other Questions You May Have**

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

**You can find additional information about our investment advisory services on our Part 2A Brochure, available at [Adviserinfo.sec.gov](https://adviserinfo.sec.gov). You may contact us at 206-743-5907 if you have questions or to request a current copy of this Relationship Summary.**

### **Other Questions You May Have**

*Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*