

**ITEM 1: Cover Page for
PART 2B OF FORM ADV:
BROCHURE SUPPLEMENT
DATED 03/07/2011**

DAVID DAUGHTREY

**COPPERWYND FINANCIAL, LLC
8560 E. SHEA BLVD.
SCOTTSDALE AZ 85260
(480) 348-2100**

This brochure supplement provides information about David Daughtrey that supplements our brochure. You should have received a copy of that brochure. Please contact David Daughtrey if you did not receive Copperwynd Financial, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about David Daughtrey is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

David Daughtrey, CFA, CFP®

Born in 1958

Education post high school

Texas Tech University, BS in Business Administration

Brigham Young University, Master of Business Administration

Business Background for previous 5 years

4/07- Present, Copperwynd Financial LLC, Managing Member and Chief Compliance Officer

3/05-Present, Cambridge Investment Research, Inc. Registered Principal, Advisor Representative

1/05-3/05, Commonwealth Financial Network, Registered Representative/Advisor Representative

1/02-1/05, Walnut Street Securities, Inc, Registered Representative/Advisor Representative

(Registration was held with Nathan & Lewis Securities until 8/03 when firm name was changed to Walnut Street Securities, Inc.).

Mr. Daughtrey has the professional designation, Chartered Financial Analyst®. Holders of the Chartered Financial Analyst®, CFA®, designation are securities analysts, money managers and investment advisers who have completed the CFA program, a graduate-level, self-study curriculum and examination program for investment professionals that covers a broad range of investment topics. CFA charter holders are required to affirm their commitment to high ethical standards and voluntarily submit to the authority

To earn the CFA charter, you must successfully pass through the CFA Program, sponsored by the CFA Institute, a graduate-level self-study program that combines a broad curriculum with professional conduct requirements, culminating in three sequential exams.

Before you enroll in the CFA Program and register for your first exam:

- Meet the entrance requirements:
 - Have a bachelor's (or equivalent) degree - or be in the final year of your bachelor's degree program at the time of registration. or have four years of qualified, professional work experience - or have a combination of work and college experience that totals at least four years (Note: Summer, part-time, and internship positions do not qualify). If you initially enroll/register as a final year undergraduate student with a degree in progress, you may not register for the Level II exam until you have earned your degree, or obtained work experience that meets the program's entrance requirements. At the time your degree is awarded, you may update your account education information to certify that your degree has been received.
 - Understand the professional conduct requirements (you will be asked to sign the Professional Conduct Statement and Candidate Responsibility Statement).

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of 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 the 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 in order 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 interests of their clients.

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

Item 3. Disciplinary Information¹

If there are legal or disciplinary events material to your evaluation of David Daughtrey, we are required to disclose all material facts regarding those events.

We have nothing to disclose in this regard.

Item 4. Other Business Activities

- A. If David Daughtrey is actively engaged in any *investment-related* business or occupation, including if David Daughtrey is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant (“FCM”), commodity pool operator (“CPO”), commodity trading advisor (“CTA”), or an associated *person* of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business

Mr. Daughtrey is a registered representative of Cambridge Investment Research, Inc., member NASD/SIPC. In his separate capacity as a registered representative, Mr. Daughtrey may earn commissions from securities sales. These sales would be executed through Fortune Financial Services.

Also as a licensed insurance agent, Mr. Daughtrey may recommend to his advisory clients a variety of insurance products, and he may offer commissionable insurance products to Advisor’s clients for which he may receive compensation.

1. If a relationship between the advisory business and David Daughtrey’s other financial industry activities creates a material conflict of interest with you, the SEC requires us to describe the nature of the conflict and generally how we address it.

The relationship between Cambridge Investment Research, Inc., member NASD/SIPC, and Mr. Daughtrey represents a conflict of interest. To minimize the conflict we have established a Code of Ethics described in section 11 of the Firm Brochure.

2. If David Daughtrey receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service (“trail”) fees from the sale of mutual

¹ **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving David Daughtrey to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of David Daughtrey to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

funds, we have to disclose this fact. If this compensation is not cash, we are required to explain what type of compensation David Daughtrey receives. We must explain that this practice gives David Daughtrey an incentive to recommend investment products based on the compensation received, rather than on your needs.

Mr. Daughtrey may receive commissions for the sales of securities or other investment products which represents a potential conflict of interest in that Mr. Daughtrey has an incentive to make certain insurance products available to you as opposed to others. In order to avoid this conflict of interest, Mr. Daughtrey will put your interests ahead of his own. Please see our firm's Code of Ethics in section 11 of the Firm Brochure.

- B. If David Daughtrey is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of David Daughtrey's income or involve a substantial amount of David Daughtrey's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of David Daughtrey's time and income, we may presume that they are not substantial.

We have determined that there is nothing further to disclose.

Item 5. Additional Compensation

If someone who is not a *client* provides an economic benefit to David Daughtrey for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include David Daughtrey's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

Item 6. Supervision

We are required to explain how we *supervise* David Daughtrey including how we monitor the advice David Daughtrey provides to *you*. Our firm has to provide the name, title and telephone number of the *person* responsible for supervising David Daughtrey's advisory activities on behalf of our firm.

Mr. Daughtrey is the President and Chief Compliance Officer and as such has no internal supervision placed over him. She is however bound by our firm's Code of Ethics.

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LYNDA ELLEY

**COPPERWYND FINANCIAL, LLC
8560 E. SHEA BLVD.
SCOTTSDALE AZ 85260
(480) 348-2100**

This brochure supplement provides information about Lynda Elley that supplements our brochure. You should have received a copy of that brochure. Please contact David Daughtrey if you did not receive Copperwynd Financial, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Lynda Elley is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Lynda Elley

Born in 1961

Education post high school

Colorado State University, BS in Business Administration

Business Background for previous 5 years

4/07- Present, Copperwynd Financial, Managing Member

3/05- Present, Cambridge Investment Research, Inc., Registered Representative, Cambridge Investment Research Advisors, Inc., Advisor Representative

Item 3. Disciplinary Information¹

If there are legal or disciplinary events material to your evaluation of Lynda Elley, we are required to disclose all material facts regarding those events.

We have nothing to disclose in regards to Item 3.

Item 4. Other Business Activities

- A. If Lynda Elley is actively engaged in any investment-related business or occupation, including if Lynda Elley is registered, or has an application pending to register, as a broker-dealer, registered representative of a broker-dealer, futures commission merchant ("FCM"), commodity pool operator ("CPO"), commodity trading advisor ("CTA"), or an associated person of an FCM, CPO, or CTA, we are required to disclose this fact and describe the business relationship, if any, between the advisory business and the other business.

Ms. Elley is a registered representative of Cambridge Investment Research, Inc., member FINRA/SIPC. In her separate capacity as a registered representative, Ms. Elley may earn commissions from securities sales. These sales would be executed through Cambridge Investment Research, Inc.

¹ **Note:** Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Lynda Elley to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Ms. Elley to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

Also as a licensed insurance agent, Ms. Elley may recommend to her advisory clients a variety of insurance products, and she may offer commissionable insurance products to Advisor's clients for which she may receive compensation.

1. If a relationship between the advisory business and Lynda Elley's other financial industry activities creates a material conflict of interest with you, the SEC requires us to describe the nature of the conflict and generally how we address it.

The relationship between Cambridge Investment Research, Inc. and Ms. Elley represents a conflict of interest. To minimize the conflict we have established a Code of Ethics described in section 11 of the Firm Brochure.

2. If Lynda Elley receives commissions, bonuses or other compensation based on the sale of securities or other investment products, including as a broker-dealer or registered representative, and including distribution or service ("trail") fees from the sale of mutual funds, we have to disclose this fact. If this compensation is not cash, we are required to explain what type of compensation Lynda Elley receives. We must explain that this practice gives Lynda Elley an incentive to recommend investment products based on the compensation received, rather than on your needs.

Ms. Elley may receive commissions for the sales of securities or other investment products which represents a potential conflict of interest in that Ms. Elley has an incentive to make certain insurance products available to you as opposed to others. In order to avoid this conflict of interest, Ms. Elley will put your interests ahead of her own. Please see our firm's Code of Ethics in section 11 of the Firm Brochure.

- B. If Lynda Elley is actively engaged in any business or occupation for compensation not discussed in response to Item 4.A, above, and the other business activity or activities provide a substantial source of Lynda Elley's income or involve a substantial amount of Lynda Elley's time, we are required to disclose this fact and must describe the nature of that business. If the other business activities represent less than 10 percent of Lynda Elley's time and income, we may presume that they are not substantial.

We have nothing to disclose in this regard.

Item 5. Additional Compensation

If someone who is not a *client* provides an economic benefit to Lynda Elley for providing advisory services, we are required to generally describe the arrangement. For purposes of this Item, economic benefits include sales awards and other prizes, but do not include Lynda Elley's regular salary. Any bonus that is based, at least in part, on the number or amount of sales, *client* referrals, or new accounts should be considered an economic benefit, but other regular bonuses should not.

We have nothing to disclose in this regard.

Item 6. Supervision

We are required to explain how we *supervise* Lynda Elley, including how we monitor the advice Lynda Elley provides to *you*. Our firm has to provide the name, title and telephone number of the person responsible for supervising Lynda Elley's advisory activities on behalf of our firm.

David Daughtrey, President and Chief Compliance Officer of Copperwynd Financial, LLC, supervises and monitors Ms. Elley's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Daughtrey if you have any questions about Ms. Elley's brochure supplement at (480) 348-2100.