

**COPPERWYND FINANCIAL, LLC'S
WRAP FEE
PROGRAM ACCOUNTS**

Wrap Fee Program Brochure

Sponsored by:
Copperwynd Financial, LLC
8560 E. Shea Blvd., Ste. 140
Scottsdale, AZ 85260
(480) 348-2100

This brochure provides clients with information about Copperwynd Financial, LLC ("Copperwynd") and our Wrap Fee Program (the "Program"). You should consider the information in this brochure carefully before becoming a Program client. Please note that this information has not been approved or verified by any governmental authority.

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Program Description

Copperwynd's Wrap Fee Program has been designed to connect Copperwynd's clients with professional in-house money managers and investment vehicles suitable for their financial circumstances and investment objectives.

Copperwynd Wrap Fee Program

At the beginning of each client relationship, Copperwynd prepares a Plan for the client. The Plan may include Copperwynd's recommendations regarding one or more of the following: investment portfolio analysis, design and performance reports, cash flow projections, retirement planning, education funding, estate planning, tax planning, employee benefits review, risk management and insurance. In connection with the Plan or after it is complete, clients may request that Copperwynd assist them to implement their Plans using the Program.

Copperwynd's Services

Copperwynd's Wrap Fee Program Accounts. The Copperwynd's Wrap Fee Assets will be managed by Copperwynd on a discretionary basis or non-discretionary basis. Copperwynd will review the Wrap Fee Assets on a regular and continuous basis and make recommendations as Copperwynd deems appropriate. Copperwynd typically recommends mutual funds and exchange traded funds that are appropriate given the client's financial circumstances and investment goals for the Wrap Fee Program Accounts, but may also recommend other securities or money management programs from time to time. Copperwynd selects funds for inclusion in its recommended list of funds based on style, past performance, experience and track records of fund managers, and risk ratings as established by independent rating services. Copperwynd's recommendations of other securities will be based on the client's particular needs and Copperwynd's independent review of the appropriateness of the securities to assist the client to meet those needs.

Because the Wrap Fee Program Accounts may be managed on a discretionary basis, Copperwynd will implement any changes without the client's prior approval in discretionary accounts. For non-discretionary accounts, clients will be consulted before trades are executed. The client agrees to review trade confirmations received from the client's custodian and notify Copperwynd immediately of any errors.

Brokerage and Custody of Program Accounts

Copperwynd will direct transactions for Wrap Fee Program Accounts to such broker-dealers as they may select, unless the client gives specific directions otherwise. In directing or recommending brokerage, Copperwynd seeks "best execution" for client accounts, which is a combination of a number of judgmental factors including price, execution quality and client needs. Recognizing the value of these judgmental factors, brokers selected or recommended may charge commissions that are higher than the lowest commissions that might otherwise be available.

Copperwynd has relationships with (1) TD AMERITRADE INSTITUTIONAL ("TDA"), a division of TD AMERITRADE Inc., member NASD/SIPC (2) National Financial Services, LLC ("NFS"), a wholly owned subsidiary of the Fidelity Investments Group of companies (3) Pershing Financial Services, LLC ("Pershing"), or (4) Schwab Institutional division of Charles Schwab & Co., Inc. ("Schwab"), (collectively, the "Named Custodians") which are all registered broker-dealers with the NASD/SIPC. The Named Custodians will provide custody and execution services in accordance with the terms set forth in your agreement. Copperwynd reasonably believes that in the case of managed accounts, the Named Custodian's blend of execution services, commission and transaction costs as well as professionalism allows Copperwynd to seek best execution and competitive prices.

Program Fees

The annual Program Fees payable to Copperwynd is as follows:

Maximum Fee (as a percentage of assets)

Minimum Amount Required: \$25,000)

<u>Account Balance</u>	<u>Advisory Fee</u>
\$0 to \$99,999	2.00% annually, 0.50% quarterly
\$100,000 to \$1,000,000	1.50% annually, 0.375% quarterly
\$1,000,001 to \$9,999,999	1.25% annually, 0.3125% quarterly
Over \$10,000,000	1.00% annually, 0.25% quarterly

What services are covered by the Program Fees? The Program Fees pay for Copperwynd's advisory services to clients under the Program, administrative expenses of the Program, custody charges for clients at the Named Custodians and brokerage services for Program accounts to the extent trades are conducted through the Named Custodians.

What services are not covered by the Program Fees? The Program Fees do not cover brokerage to the extent trades are conducted through brokers or dealers other than the Named Custodians and custody charges if clients are custodied anywhere other than the Named Custodians. Finally, the Program Fees do not include expenses of mutual funds that may be included in the client's portfolio.

How are fees charged? Billing is quarterly in advance, based from the value of the Client account at the close of the previous quarter. Clients may be invested in alternative investments, outside the the scope of regular investments. Billing for alternative investments will be based from the most recently disclosed value by the investment. In some cases, these investments may reflect values which have been disclosed a month earlier than the close of a previous quarter. If management begins after the start of a quarter, Program Fees will be prorated accordingly. If a client terminates its agreement with Copperwynd, then any balance due to either party shall be settled in a reasonable time frame.

Is there a minimum fee and are fees negotiable? Program accounts are not subject to a minimum annual fee but clients are required to invest a minimum amount of \$25,000 in the Program. In some instances fees and minimums may be negotiable, at the discretion of Copperwynd.

Additional Information about Program Fees. Copperwynd generally does not offer the services provided under the Program separately. However, clients may be able to purchase services similar to those offered under the Program from other service providers either separately or as part of a similar wrap fee program. These services or programs may cost more or less than the Program, depending on the fees charged by such other service providers.

About Copperwynd and its Affiliations

Key Personnel

David Daughtrey, CFA, CFP and Lynda Elley are the key members of the firm. They conduct the reviews of all client accounts.

Education and Business Standards

All individuals that give investment advice on behalf of Copperwynd must have earned a college degree and/or have substantive investment-related experience or a related professional designation, such as a Certified Financial Planner™ practitioner. In addition, all such individuals shall have attained all required investment-related licenses and/or designations.

Other Financial Industry Activities or Affiliations

Certain investment advisory representatives of Copperwynd are registered representative and/or investment advisory representatives of Cambridge Investment Research, Inc., an NASD registered broker-dealer. In their separate roles as registered representatives, they may offer to sell clients securities on a commissionable basis for which they will earn the normal commissions. Additionally, certain investment advisory representatives of Copperwynd are insurance agents or brokers with various insurance companies for the sale of commissionable insurance products for which they may earn the usual commissions. Finally, please see Item 6 of Schedule F for any additional investment advisers that Mr. Daughtrey and Ms. Elley may be associated with.