

**Item 1: Cover Page
Part 2A of Form ADV: Firm Brochure
March 7, 2019**

**Copperwynd Financial, LLC
14256 N. Northsight Blvd., Suite B-115
Scottsdale, AZ 85260
(480) 348-2100**

**Firm Contact:
Erick Newton, Chief Compliance Officer**

**Firm Website:
www.copperwyndfinancial.com**

This brochure provides information about the qualifications and business practices of Copperwynd Financial, LLC. If you have any questions about the contents of this brochure, please contact Erick Newton by telephone at (480) 348-2100 or email at enewton@copperwyndfinancial.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any State Securities Authority.

Additional information about Copperwynd Financial, LLC is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD #143442.

Please note that the use of the term "registered investment adviser" and description of Copperwynd Financial, LLC and/or our associates as "registered" does not imply a certain level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and its employees.

Item 2: Material Changes

Copperwynd Financial, LLC is required to advise you of any material changes to our Firm Brochure ("Brochure") from our last annual update, identify those changes on the cover page of our Brochure or on the page immediately following the cover page, or in a separate communication accompanying our Brochure.

Since the last annual amendment filed on 02/13/2018, the following changes have been made:

- We now offer Model Management services. Please see Item 4 for additional information.
- Our firm does not offer or sponsor a wrap fee program for new clients. We may still offer wrap services to legacy clients. Please see Item 4 for additional information.
- Our firm offers Retirement Plan Consulting Services. Please see Items 4 & 5 for additional information.
- We have reduced our maximum fee to 1.20%. Please see Item 5 for additional information.

Item 3: Table of Contents

Section:	Page(s):
Item 1: Cover Page	1
Item 2: Material Changes.....	2
Item 3: Table of Contents	3
Item 4: Advisory Business.....	4
Item 5: Fees & Compensation.....	6
Item 6: Performance-Based Fees & Side-By-Side Management.....	7
Item 7: Types of Clients & Account Requirements	7
Item 8: Methods of Analysis, Investment Strategies & Risk of Loss	8
Item 9: Disciplinary Information.....	10
Item 10: Other Financial Industry Activities & Affiliations.....	10
Item 11: Code of Ethics, Participation or Interest in Client Transactions & Personal Trading.....	10
Item 12: Brokerage Practices	11
Item 13: Review of Accounts or Financial Plans.....	14
Item 14: Client Referrals & Other Compensation.....	14
Item 15: Custody	16
Item 16: Investment Discretion.....	17
Item 17: Voting Client Securities.....	17
Item 18: Financial Information.....	17

Item 4: Advisory Business

We specialize in the following types of services: Asset Management and Financial Planning and Consulting. We are dedicated to providing individuals and other types of clients with a wide array of investment advisory services. Our firm is a limited liability company formed in the State of Arizona. Our firm has been in business as an investment adviser since 2007 and is owned as follows:

David Blane Daughtrey – 68% Owner

Lynda Krantz Elley – 20% Owner

Erick Scot Newton – 7% Owner

Jacob Eggett – 5% Owner

Types of Advisory Services Offered

Asset Management:

We emphasize continuous and regular account supervision. As part of our Asset Management service, we generally create a portfolio, consisting of individual stocks or bonds, exchange traded funds (“ETFs”), options, mutual funds, inverse or leveraged positions and other public securities or investments. The client’s individual investment strategy is tailored to their specific needs and includes some or all of the previously mentioned securities. Each portfolio will be initially designed to meet a particular investment goal, which we determine to be suitable to the client’s circumstances. Once the appropriate portfolio has been determined, we review the portfolio at least annually and if necessary, rebalance the portfolio based upon the client’s individual needs, stated goals and objectives. Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio.

Financial Planning and Consulting:

We provide a variety of Financial Planning and Consulting services to individuals, families and other clients regarding the management of their financial resources based upon an analysis of client’s current situation, goals, and objectives. Generally, such financial planning services will involve preparing a financial plan or rendering a financial consultation for clients based on the client’s financial goals and objectives. This planning or consulting encompasses one or more of the following areas: Investment Planning, Retirement Planning, Estate Planning, Charitable Planning, Education Planning, Corporate and Personal Tax Planning, Cost Segregation Study, Corporate Structure, Real Estate Analysis, Mortgage/Debt Analysis, Insurance Analysis, Lines of Credit Evaluation, Business and Personal Financial Planning.

Our written financial plans or financial consultations rendered to clients usually include general recommendations for a course of activity or specific actions to be taken by the clients. For example, recommendations may be made that the clients begin or revise investment programs, create or revise wills or trusts, obtain or revise insurance coverage, commence or alter retirement savings, or establish education or charitable giving programs. It should also be noted that we refer clients to an accountant, attorney or other specialist, as necessary for non-advisory related services. For financial planning engagements, we provide our clients with an online summary of their financial situation, observations, and recommendations. For financial consulting engagements, we usually do not provide our clients with a written summary of our observations and recommendations as the process is less formal than our planning service. Financial plans are typically presented to the clients within 90 days of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the clients. In all cases plans or consultations will be completed within six (6) months. Implementation of the recommendations will be at the discretion of the client.

Model Management

Copperwynd Financial LLC sells trading signals to outside Registered Investment Advisors based on Copperwynd Financial's proprietary models. This proprietary information is licensed to outside Registered Investment Advisors under a separate written agreement authorizing them to apply the trading signals for their own client accounts for which they have discretion over at other financial institutions.

Retirement Plan Consulting:

Our firm provides retirement plan consulting services to employer plan sponsors on an ongoing basis. Generally, such consulting services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising may include:

- Establishing Investment Guidance– Our firm will assist in the development of a broad strategy to be employed to meet the objectives.
- Investment Options – Our firm will work with the Plan Sponsor to evaluate existing investment options and make recommendations for appropriate changes.
- Asset Allocation and Portfolio Construction – Our firm will develop strategic asset allocation models to aid Participants in developing strategies to meet their investment objectives, time horizon, financial situation and tolerance for risk.
- Investment Monitoring – Our firm will monitor the performance of the investments and will meet with the client at least annually to reassess their risk and objectives.
- Participant Education – Our firm will provide opportunities to meet with plan participants individually about their retirement plan offerings, different investment options, and general guidance on allocation strategies when we meet with them at least annually.

In providing services for retirement plan consulting, our firm does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, "Excluded Assets"). All retirement plan consulting services shall be in compliance with the applicable state laws regulating retirement consulting services. This applies to client accounts that are retirement or other employee benefit plans ("Plan") governed by the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). If the client accounts are part of a Plan, and our firm accepts appointment to provide services to such accounts, our firm acknowledges its fiduciary standard within the meaning of Section 3(21) of ERISA as designated by the Retirement Plan Consulting Agreement with respect to the provision of services described therein.

Tailoring of Advisory Services

We offer individualized investment advice to clients utilizing our Asset Management services. Additionally, we offer general investment advice to clients utilizing our Financial Planning and Consulting.

Each client has the opportunity to place reasonable restrictions on the types of investments to be held in the portfolio. However, restrictions on investments in certain securities or types of securities are

not always possible due to the level of difficulty this would entail in managing the account. Restrictions would be limited to our Asset Management services. We do not manage assets through our other services.

Participation in Wrap Fee Programs

Our firm does not offer or sponsor a wrap fee program for new clients. We may still offer wrap services to legacy clients.

Regulatory Assets Under Management

As of December 31, 2018, we manage \$296,448,695 on a discretionary basis and \$0 on a non-discretionary basis.

Item 5: Fees & Compensation

Compensation for Our Advisory Services

Our firm's maximum annual fee will be 1.20%. The fee assessed to your accounts(s) will be detailed in Schedule A of our investment advisory agreement. Our firm's annualized fees are billed on a pro-rata basis quarterly in advance based on the value of your account on the last day of the previous quarter. Fees are negotiable and will be deducted from your account. We do not offer direct billing as an option to our Asset Management clients. As part of the fee deduction process, the client is made aware of the following:

- a) Your independent custodian sends statements at least quarterly to you showing the market values for each security included in the Assets and all disbursements in your account including the amount of the advisory fees paid to us;
- b) You provide authorization permitting us to be directly paid by these terms. We send our invoice directly to the custodian;

Financial Planning & Consulting:

We charge on an hourly or flat fee basis for Financial Planning and Consulting services. The total estimated fee, as well as the ultimate fee that we charge you, is based on the scope and complexity of our engagement with you. Our hourly fees are \$350 for financial advisors, \$150 per hour for para-planners and \$75 for administrative time. Flat fees generally range from \$2,500 to \$10,000.

We require a retainer of fifty-percent (50%) of the ultimate financial planning or consulting fee with the remainder of the fee directly billed to you and due to us within thirty (30) days of your financial plan being delivered or consultation rendered to you. In all cases, we will not require a retainer exceeding \$1,200 when services cannot be rendered within 6 (six) months.

Retirement Plan Consulting:

Our Retirement Plan Consulting services are billed a fee based on the percentage of Plan assets under management. The total estimated fee, as well as the ultimate fee charged, is based on the scope and complexity of our engagement with the client. Fees based on a percentage of managed Plan assets

will not exceed 1.20%. The fee-paying arrangements will be determined on a case-by-case basis and will be detailed in the signed consulting agreement.

Other Types of Fees & Expenses

Clients will incur transaction charges for trades executed by their chosen custodian. These transaction fees are separate from our firm's advisory fees and will be disclosed by the chosen custodian. Clients may also pay holdings charges imposed by the chosen custodian for certain investments, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from custodian, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. Our firm does not receive a portion of these fees.

Termination & Refunds

We charge our advisory fees quarterly in advance. In the event that you wish to terminate our services, we will refund the unearned portion of our advisory fee to you. You need to contact us in writing and state that you wish to terminate our services. Upon receipt of your letter of termination, we will proceed to close out your account and process a pro-rata refund of unearned advisory fees.

Commissionable Securities Sales

We only place trades or sell commission products such as 529 plans, Insurance and Annuities. In order to do so, our supervised persons are registered representatives of Purshe, Kaplan, Sterling Investments ("PKS"), member FINRA/SIPC. Our representatives accept compensation for the sale of securities or other investment products, including distribution or service ("trail") fees from the sale of mutual funds. This presents a conflict of interest and gives our firm and/or our supervised persons an incentive to recommend investment products based on the compensation received. To mitigate this potential conflict, our firm and its representatives, as fiduciaries, shall act in the best interest of our clients. Our relationship with PKS in no way prohibits you from purchasing investment products recommended by us through other brokers or agents which are not affiliated with us.

Item 6: Performance-Based Fees & Side-By-Side Management

Our firm does not charge performance-based fees.

Item 7: Types of Clients & Account Requirements

We have the following types of clients:

- Individuals and High Net Worth Individuals;
- Pension and Profit Sharing Plans; and
- Corporations, limited liability companies and/or other business types.

Our requirements for opening and maintaining accounts or otherwise engaging us:

- We require a minimum household balance of \$750,000 for our Asset Management service. Generally, this minimum account balance requirement is negotiable on a case by case basis, and would be required throughout the course of the client's relationship with our firm.

Item 8: Methods of Analysis, Investment Strategies & Risk of Loss

Methods of Analysis

We use the following methods of analysis in formulating our investment advice and/or managing client assets:

Charting: In this type of technical analysis, we review charts of market and security activity in an attempt to identify when the market is moving up or down and to predict when how long the trend may last and when that trend might reverse.

Fundamental Analysis: We attempt to measure the intrinsic value of a security by looking at economic and financial factors (including the overall economy, industry conditions, and the financial condition and management of the company itself) to determine if the company is underpriced (indicating it may be a good time to buy) or overpriced (indicating it may be time to sell). Fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock.

Technical Analysis: We analyze past market movements and apply that analysis to the present in an attempt to recognize recurring patterns of investor behavior and potentially predict future price movement. Technical analysis does not consider the underlying financial condition of a company. This presents a risk in that a poorly-managed or financially unsound company may underperform regardless of market movement.

Cyclical Analysis: In this type of technical analysis, we measure the movements of a particular stock against the overall market in an attempt to predict the price movement of the security.

Investment Strategies We Use

We use the following strategies in managing client accounts, provided that such strategies are appropriate to the needs of the client and consistent with the client's investment objectives, risk tolerance, and time horizons, among other considerations:

Long-Term Purchases: When utilizing this strategy, we purchase securities with the idea of holding them for a relatively long time (typically held for at least a year). A risk in a long-term purchase strategy is that by holding the security for this length of time, we will not take advantage of short-term gains that could be profitable to a client. Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell. Typically, we employ this sub-strategy when we believe the securities to be well valued; and/or we want exposure to a particular asset class over time, regardless of the current projection for this class.

Short-Term Purchases: When utilizing this strategy, we purchase securities with the idea of selling them within a relatively short time (typically a year or less). We do this in an attempt to take advantage of conditions that we believe will soon result in a price swing in the securities we purchase. The risk in this strategy is that the initial funds invested may be lost if a client is heavily invested in

one stock or sector of the market with an unsuitable investment or market crash.

Trading: We purchase securities with the idea of selling them very quickly (typically within 30 days or less). We do this in an attempt to take advantage of our predictions of brief price swings.

Option Writing: We use options as an investment strategy. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an asset (such as a share of stock) at a specific price on or before a certain date. An option, just like a stock or bond, is a security. An option is also a derivative, because it derives its value from an underlying asset. The two types of options are calls and puts. A call gives us the right to buy an asset at a certain price within a specific period of time. We will buy a call if we have determined that the stock will increase substantially before the option expires. A put gives us the holder the right to sell an asset at a certain price within a specific period of time. We will buy a put if we have determined that the price of the stock will fall before the option expires.

We will use options to "hedge" a purchase of the underlying security; in other words, we will use an option purchase to limit the potential upside and downside of a security we have purchased for your portfolio.

We use "covered calls", in which we sell an option on security you own. In this strategy, you receive a fee for making the option available, and the person purchasing the option has the right to buy the security from you at an agreed-upon price.

We use a "spreading strategy", in which we purchase two or more option contracts (for example, a call option that you buy and a call option that you sell) for the same underlying security. This effectively puts you on both sides of the market, but with the ability to vary price, time and other factors.

Inherent risks associated with this investment strategy include time sensitivity and that options are less tangible than other investments. An options contract is for a short period—generally a few months. The buyer of an option could lose his or her entire investment even with a correct prediction about the direction and magnitude of a particular price change if the price change does not occur before the option expires. Options are book entry only investments and do not come with paper certificates of ownership.

Risk of Loss

Our firm does not guarantee the future performance of Client assets or any specific level of performance, the success of any investment decision or strategy that we may use, or the success of our firm's overall management of the Assets. You understand that investment decisions made by our firm are subject to various markets, currency, economic, political and business risks, and that those investment decisions will not always be profitable. Investing in securities involves risk of loss that clients should be prepared to bear.

Description of Material, Significant or Unusual Risks

We generally invest client's cash balances in money market funds, FDIC Insured Certificates of Deposit, high-grade commercial paper and/or government backed debt instruments. Ultimately, we try to achieve the highest return on our client's cash balances through relatively low-risk

conservative investments. In most cases, at least a partial cash balance will be maintained in a money market account so that our firm may debit advisory fees for our services related to Asset Management, as applicable.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to the evaluation of our advisory business or the integrity of our management.

Item 10: Other Financial Industry Activities & Affiliations

As mentioned in Item 5, our representatives are registered representative of PKS. Additionally, representatives of our firm are licensed insurance agents/brokers with various companies. In their roles as insurance agents/brokers, they offer commissionable insurance products to clients for which they receive compensation. This creates an incentive to recommend products based on the compensation our management persons may earn. In order to mitigate a potential conflict of interest, our management persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics as well as clearly explaining this conflict when recommending any such products to our clients. Clients are not obligated to purchase these products. Insurance sales constitute less than 5% of their time.

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

An investment adviser is considered a fiduciary and our firm has a fiduciary duty to all clients. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. Our fiduciary duty is considered the core underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. If a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided upon request.

We recognize that the personal investment transactions of members and employees of our firm demand the application of a high Code of Ethics and require that all such transactions be carried out in a way that does not endanger the interest of any client. At the same time, we believe that if investment goals are similar for clients and for members and employees of our firm, it is logical and even desirable that there be common ownership of some securities. Therefore, in order to prevent conflicts of interest, we have in place a set of procedures (including a pre-clearing procedure) with respect to transactions effected by our members, officers and employees for their personal accounts¹. In order to monitor compliance with our personal trading policy, we have a quarterly securities transaction reporting system for all of our associates.

Furthermore, our firm has established a Code of Ethics which applies to all of our associated persons. An investment adviser is considered a fiduciary. As a fiduciary, it is an investment adviser's responsibility to provide fair and full disclosure of all material facts and to act solely in the best interest of each of our clients at all times. We have a fiduciary duty to all clients. Our fiduciary duty is considered the core

¹ For purposes of the policy, our associate's personal account generally includes any account (a) in the name of our associate, his/her spouse, his/her minor children or other dependents residing in the same household, (b) for which our associate is a trustee or executor, or (c) which our associate controls, including our client accounts which our associate controls and/or a member of his/her household has a direct or indirect beneficial interest in.

underlying principle for our Code of Ethics which also includes Insider Trading and Personal Securities Transactions Policies and Procedures. We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with our Code of Ethics. Our firm and supervised persons must conduct business in an honest, ethical, and fair manner and avoid all circumstances that might negatively affect or appear to affect our duty of complete loyalty to all clients. This disclosure is provided to give all clients a summary of our Code of Ethics. However, if a client or a potential client wishes to review our Code of Ethics in its entirety, a copy will be provided promptly upon request.

Our related persons of our firm are authorized to buy or sell securities and other investments for themselves that are also recommended to clients. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Likewise, our related persons of our firm are authorized to buy or sell securities for themselves at or about the same time they buy or sell the same securities for client accounts. In order to minimize this conflict of interest, our related persons will place client interests ahead of their own interests and adhere to our firm's Code of Ethics, a copy of which is available upon request. Further, our related persons will refrain from buying or selling the same securities within 48 hours of buying or selling for our clients. If related persons' accounts are included in a block trade, our related persons will always trade personal accounts last.

Item 12: Brokerage Practices

Selecting a Brokerage Firm

We seek to recommend a custodian/broker who will hold your assets and execute transactions on terms that are overall most advantageous when compared to other available providers and their services. We consider a wide range of factors, including, among others, these:

- Timeliness of execution
- Timeliness and accuracy of trade confirmations
- Research services provided
- Ability to provide investment ideas
- Execution facilitation services provided
- Record keeping services provided
- Custody services provided
- Frequency and correction of trading errors
- Ability to access a variety of market venues
- Expertise as it relates to specific securities
- Financial condition
- Business reputation
- Quality of services

With this in consideration, our firm participates in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include

custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through its participation in the Program. (Please see the disclosure under Item 14. below.)

TD Ameritrade also makes certain research and brokerage services available at no additional cost to our firm. These services include certain research and brokerage services, including research services obtained by TD Ameritrade directly from independent research companies, as selected by our firm (within specific parameters). Research products and services provided by TD Ameritrade to our firm may include research reports on recommendations or other information about, particular companies or industries; economic surveys, data and analyses; financial publications; portfolio evaluation services; financial database software and services; computerized news and pricing services; quotation equipment for use in running software used in investment decision-making; and other products or services that provide lawful and appropriate assistance by TD Ameritrade to our firm in the performance of our investment decision-making responsibilities. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

As a result of receiving the services discussed above, for no additional cost, we may have an incentive to continue to use or expand the use of TD Ameritrade's services. Our firm examined this potential conflict of interest when we chose to enter into the relationship with TD Ameritrade and we have determined that the relationship is in the best interest of our firm's clients and satisfies our client obligations, including our duty to seek best execution.

The custodians charge brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transaction fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). The custodians enable us to obtain many load mutual funds without transaction charges and other no-load funds at nominal transaction charges. The custodians' commission rates are generally discounted from customary retail commission rates. However, the commission and transaction fees charged by the custodians may be higher or lower than those charged by other custodians and broker-dealers.

Our clients may pay a commission to the custodians that are higher than another qualified broker dealer might charge to effect the same transaction where we determine in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although we will seek competitive rates, to the benefit of all clients, we may not necessarily obtain the lowest possible commission rates for specific client account transactions.

Soft Dollars

Although the investment research products and services that may be obtained by our firm will generally be used to service all of our clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Our firm will not seek out research, other products or services that may be obtained from broker-dealers by using commissions generated from directed brokerage. Any benefit would be used by our firm to manage accounts for which we have investment discretion.

Client Brokerage Commissions

We do not use client brokerage commissions to obtain research or other products or services. The aforementioned research and brokerage services are used by our firm to manage accounts for which we have investment discretion. Without this arrangement, our firm might be compelled to purchase the same or similar services at our own expense.

Procedures to Direct Client Transactions in Return for Soft Dollars

We do not direct client transactions to a particular broker-dealer in return for soft dollar benefits.

Brokerage for Client Referrals

Our firm does not receive brokerage for client referrals.

Directed Brokerage

Neither we nor any of our firm's related persons have discretionary authority in making the determination of the brokers with whom orders for the purchase or sale of securities are placed for execution, and the commission rates at which such securities transactions are effected. We routinely recommend that a client directs us to execute through a specified broker-dealer. Our firm recommends the use of TD Ameritrade. Each client will be required to establish their account(s) with TD Ameritrade if not already done. Please note that not all advisers have this requirement.

Permissibility of Client-Directed Brokerage

We allow clients to direct brokerage outside our recommendation. We may be unable to achieve the most favorable execution of client transactions. Client directed brokerage may cost clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices.

Aggregation of Purchase or Sale

We perform investment management services for various clients. There are occasions on which portfolio transactions will be executed as part of concurrent authorizations to purchase or sell the same security for numerous accounts served by our firm, which involve accounts with similar investment objectives. Although such concurrent authorizations potentially could be either advantageous or disadvantageous to any one or more particular accounts, they are affected only when we believe that to do so will be in the best interest of the effected accounts. When such concurrent authorizations occur, the objective is to allocate the executions in a manner which is deemed equitable to the accounts involved. In any given situation, we attempt to allocate trade executions in the most equitable manner possible, taking into consideration client objectives, current asset allocation and availability of funds using price averaging, proration and consistently non-arbitrary methods of allocation.

Item 13: Review of Accounts or Financial Plans

We review accounts on an at least an annual basis for our clients subscribing to our Asset Management service. The nature of these reviews is to learn whether clients' accounts are in line with their investment objectives, appropriately positioned based on market conditions, and investment policies, if applicable. Clients are provided online access to view quarterly performance reports at any time. We make an effort to provide verbal reports to clients on at least an annual basis when we meet with clients who subscribe to our Asset Management service.

Only our Financial Advisors or Portfolio Managers will conduct reviews.

We will review client accounts more frequently than described above. Some of the factors which trigger an off-cycle review are major market or economic events, the client's life events, and requests by the client.

Financial planning clients do not receive reviews of their written plans unless they take action to schedule a financial consultation with us. We do not provide ongoing services to financial planning clients, but are willing to meet with such clients upon their request to discuss updates to their plans, changes in their circumstances, etc.

Financial planning/consulting clients do not receive written or verbal updated reports regarding their financial plans unless they separately contract with us for a post-financial plan meeting or update to their initial written financial plan.

Item 14: Client Referrals & Other Compensation

Other Compensation

As disclosed in Item 12, we participate in TD Ameritrade's institutional customer program and may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving our participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to 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 to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through the program may benefit us but may not benefit our client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD

Ameritrade. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. clients should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

We receive client referrals from TD Ameritrade through our participation in TD Ameritrade AdvisorDirect. In addition to meeting the minimum eligibility criteria for participation in AdvisorDirect, we may have been selected to participate in AdvisorDirect based on the amount and profitability to TD Ameritrade of the assets in, and trades placed for, client accounts maintained with TD Ameritrade. TD Ameritrade is a discount broker-dealer independent of and unaffiliated with us and there is no employee or agency relationship between us. TD Ameritrade has established AdvisorDirect as a means of referring its brokerage customers and other investors seeking fee-based personal investment management services or financial planning services to independent investment advisors. TD Ameritrade does not supervise us and has no responsibility for our management of client portfolios or our other advice or services. We pay TD Ameritrade an on-going fee for each successful client referral. This fee is usually a percentage (not to exceed 25%) of the advisory fee that the client pays to us ("Solicitation Fee"). We will also pay TD Ameritrade the Solicitation Fee on any advisory fees received by us from any of a referred client's family members, including a spouse, child or any other immediate family member who resides with the referred client and hired us on the recommendation of such referred client. We will not charge clients referred through AdvisorDirect any fees or costs higher than our standard fee schedule offered to our clients or otherwise pass Solicitation Fees paid to TD Ameritrade to our clients. For information regarding additional or other fees paid directly or indirectly to TD Ameritrade, please refer to the TD Ameritrade AdvisorDirect Disclosure and Acknowledgement Form.

Our participation in AdvisorDirect raises potential conflicts of interest. TD Ameritrade will most likely refer clients through AdvisorDirect to investment advisors that encourage their clients to custody their assets at TD Ameritrade and whose client accounts are profitable to TD Ameritrade. Consequently, in order to obtain client referrals from TD Ameritrade, we may have an incentive to recommend to clients that the assets under management by us be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. In addition, we have agreed not to solicit clients referred to our firm through AdvisorDirect to transfer their accounts from TD Ameritrade or to establish brokerage or custody accounts at other custodians, except when its fiduciary duties require doing so. Our participation in AdvisorDirect does not diminish our duty to seek best execution of trades for client accounts.

We occasionally co-sponsor client events with financial assistance from various unaffiliated mutual fund companies. Such sponsorship is not in connection with client securities transactions ("soft dollar benefits") and our clients do not pay more for investment transactions effected and/or assets maintained as result of this arrangement. Additionally, there are no conditions imposed on our firm in return for such financial assistance and there is no commitment made by us to any mutual fund company or other institution as a result of these arrangements.

Referral Fees

We pay referral fees (non-commission based) to independent solicitors (non-registered representatives) for the referral of their clients to our firm in accordance with Rule 206 (4)-3 of the Investment Advisers Act of 1940. Such referral fee represents a share of our investment advisory fee charged to our clients. This arrangement will not result in higher costs to you. In this regard, we maintain Solicitors Agreements in compliance with Rule 206 (4)-3 of the Investment Advisers Act of

1940 and applicable state and federal laws. All clients referred by Solicitors to our firm will be given full written disclosure describing the terms and fee arrangements between our firm and Solicitor(s). In cases where state law requires licensure of solicitors, we ensure that no solicitation fees are paid unless the solicitor is registered as an investment adviser representative of our firm. If we are paying solicitation fees to another registered investment adviser, the licensure of individuals is the other firm's responsibility.

Item 15: Custody

We do not have custody of client funds or securities. All of our clients receive at least quarterly account statements directly from their custodians. Upon opening an account with a qualified custodian on a client's behalf, we promptly notify the client in writing of the qualified custodian's contact information. If we decide to also send account statements to clients, such notice and account statements include a legend that recommends that the client compare the account statements received from the qualified custodian with those received from our firm.

We encourage our clients to raise any questions with us about the custody, safety or security of their assets. The custodians we do business with will send you independent account statements listing your account balance(s), transaction history and any fee debits or other fees taken out of your account.

On February 21, 2017, the SEC issued a no-action letter ("Letter") with respect to Rule 206(4)-2 ("Custody Rule") under the Investment Advisers Act of 1940 ("Advisers Act"). The letter provided guidance on the Custody Rule as well as clarified that an adviser who has the power to disburse client funds to a third party under a standing letter of instruction ("SLOA") is deemed to have custody. As such, our firm has adopted the following safeguards in conjunction with our custodian:

- The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- The client authorizes the investment adviser, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- The client has the ability to terminate or change the instruction to the client's qualified custodian.
- The investment adviser has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- The investment adviser maintains records showing that the third party is not a related party of the investment adviser or located at the same address as the investment adviser.
- The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

Item 16: Investment Discretion

Clients have the option of providing our firm with investment discretion on their behalf, pursuant to an executed investment advisory client agreement. By granting investment discretion, we are authorized to execute securities transactions, which securities are bought and sold, and the total amount to be bought and sold. Limitations may be imposed by the client in the form of specific constraints on any of these areas of discretion with our firm's written acknowledgement. This type of agreement only applies to our Asset Management clients. We do not take or exercise discretion with respect to our other clients.

Item 17: Voting Client Securities

We do not accept the proxy authority to vote client securities. Clients will receive proxies or other solicitations directly from their custodian or a transfer agent. In the event that proxies are sent to our firm, we will forward them on to you and ask the party who sent them to mail them directly to you in the future. Clients may call, write or email us to discuss questions they may have about particular proxy votes or other solicitations.

Item 18: Financial Information

We are not required to provide financial information in this Brochure because:

- We do not require the prepayment of more than \$1,200 in fees and six or more months in advance.
- We do not take custody of client funds or securities.
- We do not have a financial condition or commitment that impairs our ability to meet contractual and fiduciary obligations to clients.

We have never been the subject of a bankruptcy proceeding.

COPPERWYND FINANCIAL, LLC

PRIVACY NOTICE REGARDING CLIENT PRIVACY AS REQUIRED BY REGULATION S-P & REGULATION S-AM

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of Copperwynd Financial, LLC.

Information We Collect: In connection with providing investment products, financial advice, or other services, we obtain non-public personal information about you, including:

- Information we receive from you on account applications, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income;
- Information about your transactions with us, our affiliates, or others; and
- Information received from credit or service bureaus or other third parties, such as your credit history or employment status.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with this policy. Copperwynd Financial, LLC does not sell customer lists and will not sell your name to telemarketers.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account with us, except under the following circumstances:

- To your authorized Registered Representative and his or her manager;
- To our parent companies or their affiliates, to the extent permitted by law;
- To entities that perform services for us or function on our behalf, including financial service providers, such as a clearing broker-dealer, investment company, or insurance company;
- To third parties who perform services or marketing on our behalf;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities or other third parties in response to subpoenas or other legal process as required by law or to comply with regulatory inquiries.

How We Use Information: Information may be used among companies that perform support services for us, such as data processors, technical systems consultants and programmers, or companies that help us market products and services to you for a number of purposes, such as:

- **To protect your accounts** from unauthorized access or identity theft;
- **To process your requests** such as securities purchases and sales;
- **To establish or maintain an account with an unaffiliated third party**, such as a clearing broker-dealer providing services to you and/or Copperwynd Financial, LLC;
- **To service your accounts**, such as by issuing checks and account statements;
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;

- **To keep you informed** about financial services of interest to you.

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. Copperwynd Financial, LLC does not receive information regarding marketing eligibility from affiliates to make solicitations.

Regulation S-ID: Regulation S-ID requires our firm to have an Identity Theft Protection Program (ITPP) that controls reasonably foreseeable risks to customers or to the safety and soundness of our firm from identity theft. We have developed an ITPP to adequately identify and detect to prevent and mitigate identity theft.

Our Security Policy: We restrict access to nonpublic personal information about you to those individuals who need to know that information to provide products or services to you and perform their respective duties. We maintain physical, electronic, and procedural security measures to safeguard confidential client information.

Closed or Inactive Accounts: If you decide to close your account(s) or become an inactive customer, our Privacy Policy will continue to apply to you. **Complaint Notification:** Please direct complaints to: Erick Newton, at Copperwynd Financial, LLC, 14256 N. Northsight Blvd., Suite B-115, Scottsdale, AZ 85260; (480) 348-2100.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate confidential information, we will notify you. If you have any questions concerning this Privacy Policy, please contact us at: Copperwynd Financial, LLC, 14256 N. Northsight Blvd., Suite B-115, Scottsdale, AZ 85260. (480) 348-2100.

**Item 1: Cover Page
Part 2B of Form ADV: Brochure Supplement
January 2018**

David Daughtrey

**Copperwynd Financial, LLC
14256 N. Northsight Blvd., Suite B-115
Scottsdale, AZ 85260
(480) 348-2100**

**Firm Contact:
Erick Newton, Chief Compliance Officer**

**Firm Website:
www.copperwyndfinancial.com**

This brochure supplement provides information about David Daughtrey that supplements our brochure. You should have received a copy of that brochure. Please contact Erick Newton 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 by searching CRD #2043611.

Item 2: Educational Background & Business Experience

David Daughtrey, CFA, CFP®

Born in 1958

Educational Background:

- Texas Tech University, BS in Business Administration
- Brigham Young University, Master of Business Administration

Business Background:

- 04/2007- Present Copperwynd Financial LLC, Managing Member
- 04/2011 - Present Purshe, Kaplan, Sterling Investments, Registered Representative
- 03/2005 - 03/2011 Cambridge Investment Research, Inc. Registered Principal,
- 03/2005 - 03/2011 Cambridge Investment Research Advisors, Advisor Representative
- 01/2005 - 03/2005 Commonwealth Financial Network, Registered Representative/Advisor Representative
- 01/2002 - 01/2005 Walnut Street Securities, Inc, Registered Representative/Advisor Representative

Exams, Licenses & Other Professional Designations:

- 10/1996: Series 63
- 01/2002: Series 66 & 7
- 03/2004: Series 24
- 11/2004: Series 4
- Certified Financial Planner (CFP®)
- Chartered Financial Analyst (CFA)

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

CERTIFIED FINANCIAL PLANNER, CFP®

The CFP® certification is obtained by completing an advanced college-level course of study addressing the financial planning subject areas that the CFP® Board's studies have determined as necessary for the competent and professional delivery of financial planning services, a comprehensive certification exam and agreeing to be bound by the CFP® board's *Standard of Professional Conduct*. As a prerequisite, the individual must have a Bachelor's degree from a regionally accredited United States college or university (or foreign university equivalent) and have at least 3 years of full time financial planning experience (or equivalent measured at 2,000 hours per year). This designation requires 30 hours of continuing education every 2 years and renewing an agreement to be bound by the *Standards of Professional Conduct*.

Chartered Financial Analyst (CFA®)

The CFA® charter is a globally respected, graduate-level investment credential established in 1962 and awarded by CFA® Institute — the largest global association of investment professionals. To earn the CFA® charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA® Institute as members; and 4) commit to abide by, and annually reaffirm, their adherence to the CFA® Institute Code of Ethics

and Standards of Professional Conduct. The CFA® Program curriculum is updated every year by experts from around the world to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession. To learn more about the CFA® charter, visit www.CFAinstitute.org.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Daughtrey.

Item 4: Other Business Activities

Mr. Daughtrey, as a licensed insurance agent, may recommend to his advisory clients a variety of insurance products for which he may receive compensation. A conflict of interest may arise as these commissionable insurance product sales may create an incentive to recommend products based on the compensation Mr. Daughtrey receives and may not necessarily be in the best interests of the client. In order to minimize this conflict of interest, Mr. Daughtrey will place client interests ahead of his own interests and adhere to our firm's Code of Ethics as well as clearly explaining the conflict of interest when recommending any such products to clients. Clients are not obligated to purchase these products. Insurance sales constitute less than 5% of his time.

Mr. Daughtrey is a registered representative of Purshe, Kaplan, Sterling Investments, member NASD/SIPC. In his separate capacity as a registered representative, Mr. Daughtrey may earn commissions from securities sales. A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products based on the compensation he may earn and may not necessarily be in the best interests of the client. In order to minimize this conflict of interest, Mr. Daughtrey will place client interests ahead of his own interests and adhere to our firm's Code of Ethics as well as clearly explaining this conflict when recommending any such products to his clients. Clients are informed they are not obligated to purchase these products.

Item 5: Additional Compensation

Mr. Daughtrey does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

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

**Item 1: Cover Page
Part 2B of Form ADV: Brochure Supplement
January 2018**

Lynda Elley

**Copperwynd Financial, LLC
14256 N. Northsight Blvd., Suite B-115
Scottsdale, AZ 85260
(480) 348-2100**

**Firm Contact:
Erick Newton, Chief Compliance Officer**

**Firm Website:
www.copperwyndfinancial.com**

This brochure supplement provides information about Lynda Elley that supplements our brochure. You should have received a copy of that brochure. Please contact Erick Newton 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 by searching for CRD #4735649.

Item 2: Educational Background & Business Experience

Lynda Elley CFP®, CLTC

Born in 1961

Educational Background:

- Colorado State University, BS in Business Administration

Business Background:

- 04/07- Present Copperwynd Financial, Managing Member
- 03/05- 03/11 Cambridge Investment Research, Inc., Registered Representative
- 03/05 - 03/11 Cambridge Investment Research Advisors, Inc., Advisor Representative

Exams, Licenses & Other Professional Designations:

- 12/2003: Series 7
- 01/2004: Series 66
- Certified Financial Planner (CFP®)
- Certified in Long-Term Care (CLTC)
- Certified College Planning Specialist (CCPS®)

CFP® - CERTIFIED FINANCIAL PLANNER™:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered 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 high standard of professional education, stringent code of conduct and standards of practice and ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements: 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, pass the comprehensive CFP® Certification Examination, Complete at least three years of full-time financial planning-related experience and agree to be bound by CFP Board's *Standards of Professional Conduct*.

Individuals who become certified must 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 industry and 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.

CLTC - Certified in Long-Term Care:

The "Certified in Long-Term Care" (CLTC) designation is obtained by taking a 7-part multi-disciplinary course. The program is offered either in a 2-day classroom setting, referred to as the

Master Class, or by Correspondence Course. The Master Class is taught nationally by CLTC trained instructors, all of whom have extensive experience in selling long-term care insurance. The program qualifies for CE credits in all states. The designation is renewable every year.

Students are required to pass a written examination to receive the CLTC designation as well as a certificate of good standing, or equivalent, from the student's state insurance authority an affidavit, under oath, from the student stating he or she has not had a judgment relating to fraudulent behavior in their profession entered against him or her in the past 5 years.

CCPS® - Certified College Planning Specialist

The CCPS® (Certified College Planning Specialist™) certification mark identifies college financial planning professionals who have met the high standards of competency and ethics established and enforced by the Association of Certified College Planning Specialists.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Ms. Elley.

Item 4: Other Business Activities

Ms. Elley, as a licensed insurance agent, may recommend to his advisory clients a variety of insurance products for which she may receive compensation. A conflict of interest may arise as these commissionable insurance product sales may create an incentive to recommend products based on the compensation Ms. Elley receives and may not necessarily be in the best interests of the client. In order to minimize this conflict of interest, Ms. Elley will place client interests ahead of her own interests and adhere to our firm's Code of Ethics as well as clearly explaining the conflict of interest when recommending any such products to clients. Clients are not obligated to purchase these products. Insurance sales constitute less than 5% of his time.

Item 5: Additional Compensation

Ms. Elley does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

Erick Newton, 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. Newton if you have any questions about Ms. Elley's brochure supplement at (480) 348-2100.

**Item 1: Cover Page
Part 2B of Form ADV: Brochure Supplement
January 2018**

Erick Newton

**Copperwynd Financial, LLC
14256 N. Northsight Blvd., Suite B-115
Scottsdale, AZ 85260
(480) 348-2100**

**Firm Contact:
Erick Newton, Chief Compliance Officer**

**Firm Website:
www.copperwyndfinancial.com**

This brochure supplement provides information about Erick Newton that supplements our brochure. You should have received a copy of that brochure. Please contact Erick Newton 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 Erick Newton is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD #2318675.

Item 2: Educational Background & Business Experience

Erick Scot Newton, CFP®

Year of Birth: 1969

Educational Background:

- University of Arizona, BS in Finance and Accounting
- Arizona State University, Master of Business Administration

Business Background:

- 04/2011 – Present Purshe Kaplan Sterling Investments, Registered Representative
- 01/2011 – Present Copperwynd Financial, LLC; Member, Chief Compliance Officer and Investment Advisor
- 09/2010 – 01/2011 Unemployed
- 11/1993 – 09/2010 Charles Schwab & Co.; Director

Exams, Licenses & Other Professional Designations:

- 04/1993: Series 7 & 63 Exams
- 01/1997: Series 8 Exam
- 10/2006: Series 24 Exam
- Certified Financial Planner - CFP®

CFP® - CERTIFIED FINANCIAL PLANNER™:

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered 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 high standard of professional education, stringent code of conduct and standards of practice and ethical requirements that govern professional engagements with clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements: 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, pass the comprehensive CFP® Certification Examination, Complete at least three years of full-time financial planning-related experience and agree to be bound by CFP Board’s *Standards of Professional Conduct*.

Individuals who become certified must 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 industry and 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.

Our firm must disclose if Mr. Newton has no high school education, no formal education after high school, or no business background. We may list any professional designations held by Mr. Newton.

We must provide you with a sufficient explanation of the minimum qualifications required for each designation to allow you to understand the value of the designation.

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Newton.

Item 4: Other Business Activities

Mr. Newton is a registered representative of Purshe, Kaplan, Sterling Investments, member NASD/SIPC. In his separate capacity as a registered representative, Mr. Newton may earn commissions from securities sales. A conflict of interest may arise as these commissionable securities sales may create an incentive to recommend products based on the compensation he may earn and may not necessarily be in the best interests of the client. In order to minimize this conflict of interest, Mr. Newton will place client interests ahead of his own interests and adhere to our firm's Code of Ethics as well as clearly explaining this conflict when recommending any such products to his clients. Clients are informed they are not obligated to purchase these products.

Item 5: Additional Compensation

Mr. Newton does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

David Daughtrey is a principal of Copperwynd Financial, LLC and as such supervises and monitors Mr. Newton'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 Mr. Newton's brochure supplement at (480) 348-2100.

**Item 1: Cover Page
Part 2B of Form ADV: Brochure Supplement
January 2018**

Jacob Eggett

**Copperwynd Financial, LLC
14256 N. Northsight Blvd., Suite B-115
Scottsdale, AZ 85260
(480) 348-2100**

**Firm Contact:
Erick Newton, Chief Compliance Officer**

**Firm Website:
www.copperwyndfinancial.com**

This brochure supplement provides information about Jacob Eggett that supplements our brochure. You should have received a copy of that brochure. Please contact Erick Newton 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 Jacob Eggett is available on the SEC's website at www.adviserinfo.sec.gov by searching CRD #5066522.

Item 2: Educational Background & Business Experience

Jacob Eggett

Born in 1979

Business Background:

- 01/2016 – Present Copperwynd Financial, LLC; Investment Adviser Representative
- 06/2010 – 01/2016 TD Ameritrade; Investment Consultant
- 10/2005 – 06/2010 Fidelity Investments; Financial Representative

Exams, Licenses & Other Professional Designations:

- 08/2007: Series 66
- 02/2006: Series 63
- 02/2006: Series 7

Item 3: Disciplinary Information

There are no legal or disciplinary events material to the evaluation of Mr. Eggett.

Item 4: Other Business Activities

Mr. Eggett does not have any outside business activities to report.

Item 5: Additional Compensation

Mr. Eggett does not receive any other economic benefit for providing advisory services in addition to advisory fees.

Item 6: Supervision

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