

June 23, 2020

Item 1 - Introduction

Copper Harbor Investment Advisors, LLC (CHIA), located in Appleton Wisconsin, is registered with the Securities and Exchange Commission as an Investment Adviser. We are employee owned. There is a difference between brokerage firms (broker-dealers) and investment advisory firms (RIA's) and we believe it is important for retail investor and/or clients to understand those differences. There are free and simple tools online available to research firms and financial professionals at www.investors.gov/CRS, which also provide free educational materials about broker-dealers, investment advisers, and investing.

Item 2 – Relationships and Services

What investment services and advice can you provide me?

CHIA provides investment advice and financial planning to high net worth individuals, pensions and defined contribution plans, trusts, estates, charitable/non-profit entities, corporations and other business entities. CHIA develops a personalized Investment Policy Statement for each client and manages the clients assets based on that statement. CHIA manages advisory accounts on a discretionary basis. CHIA's internal investment committee chooses and monitors funds and updates investment allocations and holdings in discretionary accounts. CHIA also manages non discretionary accounts for company retirement plans. Individual clients can also have self-directed accounts under CHIA. Under these arrangements, clients make all investment decisions.

How will you choose investments to recommend to me?

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

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

CHIA believes that clients who will have \$500,000 of assets in their accounts within 5 years of establishment can benefit from an investment advisory service relationship. This type of relationship results in investments that are selected based on their merits and from a fiduciary perspective, not based on fees or commissions they're able to generate. Clients who have attained that level of wealth, or aspire to do so, can benefit from a holistic long-term planning approach that considers their total financial situation.

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

CHIA advisors collectively have 80+ years of experience managing investments and guiding client relationships. All of the advisors have accounting firm and bank trust experience. All have bachelor's and/or master's degrees and several have special designations – specifically CFP® and CTFA®. Holding these designations indicates a commitment to advanced education in the field of investments and planning and an ongoing commitment to continual learning and studying of the trends in the industry.

Item 3 - Fees, Costs, Conflicts, and Standard of Conduct

What fees will I pay?

You will pay fees and costs whether you make or lose money on your investments. Fees will reduce the amount of money you make on your investments over time. When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. All fully managed discretionary accounts will be subject to our fee schedule based upon the market value of assets in the account. Special arrangements can be made to adjust the fee schedule listed below for accounts that meet certain requirements or desire special services. Fees for individual asset management relationships are taken in arrears and on a monthly basis. The annual rate agreed upon between the

investment adviser and client is applied to month-end account balances then divided by 12. Each monthly fee will be deducted directly from client accounts unless otherwise noted in our service agreement.

The CHIA fee schedule for managed assets is as follows:

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

Help me understand how those fees and costs might affect my investments.

If I client were to give \$10,000 to CHIA to invest, their annual fees based on the above fee schedule would be \$95. One twelfth of that fee would be deducted each month from the clients account.

For company retirement plans managed by CHIA: A fee calculation method that values the plan assets daily and determines a daily fee expense based on a negotiated fee schedule is used. At the end of each month or quarter, the daily fees are summed to arrive at the monthly or quarterly fee amount that is withdrawn from each participant account unless otherwise arranged.

Other fees I might pay: The Custodian for your account may periodically charge for some security transactions, wire transfers or similar custodial services. CHIA passes these costs through to your account without mark-up or adjustment.

For self directed or hourly arrangements: CHIA may charge a financial planning fee ranging from \$150 - \$300 hourly. Financial planning fees are negotiated separately based on the client's desired work/questions.

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

When we act as your investment advisor, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. As an example, if you invest more of your assets with CHIA, the fees paid to CHIA will increase. For each addition or new account that clients bring to CHIA, we will explain how their fees will be impacted.

How do your financial professionals make money?

CHIA advisors are paid a base salary each year. Revenue earned by the firm from professional advisory services or recommendations to clients is divided by the advisors based on their ownership in CHIA. CHIA advisors earn no compensation based on the products or investments used in a client's account. There is no differential compensation based on the size of a client relationship with CHIA. CHIA sells no commission products.

Item 4 – Disciplinary History

Do your financial professionals have legal or disciplinary history? Yes, please look our disciplinary history directly at www.investor.gov/CRS for free and simple search tool to research Copper Harbor Investment Advisors, LLC and other financial professionals in our industry.

Item 5 – Additional Information

Additional information can be obtained by contacting us at 920-687-7205 and requesting a copy of our CRS form. Our principal contact person is Steve Hooyman, Founder and President of Copper Harbor Investment Advisors, LLC.