

Item 1: Cover Page



Copper Square Private Wealth, LLC

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Form ADV Part 2A Firm Brochure

Dated February 16, 2023

This brochure provides information about the qualifications and business practices of Copper Square Private Wealth, LLC, "CSPW". If you have any questions about the contents of this brochure, please contact us at (480) 359-4964. 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.

Copper Square Private Wealth, LLC is registered as an Investment Adviser with the State of Arizona. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about CSPW is available on the SEC's website at www.adviserinfo.sec.gov, which can be found using the firm's identification number, #313349.

Item 2: Material Changes

The last annual update of this Brochure was filed on February 21, 2022. Since then, the following changes have been made:

Form ADV, Section 1.F. Other Offices has been updated to 2 N. Central Ave., Suite 1800, Phoenix, AZ 85004.

We have updated Item 4 of our brochure to reflect that we; (i) use a third party platform to facilitate management of held away assets such as defined contribution plan participant accounts with discretion, (ii) offer tax preparation and planning services to assist with the filing of federal and state tax returns for individuals, trusts, and businesses. These services are offered through an unaffiliated third-party accounting and tax planning firm for a separate fee, and (iii) we offer asset-based portfolio management services utilizing Investment-Only Variable Annuity contracts.

Item 5 of our brochure has been updated to reflect that we offer Ongoing Comprehensive Financial Planning. This service involves working one-on-one with a financial planner over an extended period of time. By paying a fixed monthly fee, clients get to work with a financial planner who will work with them to develop and implement their plan. The financial planner will monitor the plan, recommend any changes and ensure the plan is up-to-date. Ongoing Comprehensive Financial Planning consists of an ongoing flat-fee that is paid monthly, in arrears, at a rate between \$250-\$800 per month, based on the clients financial complexity. The fee may be negotiable in certain cases at the discretion of CSPW.

Additionally, Item 5 of our brochure also reflects; (i) our Pension Consulting Services Fees. Our fees for pension consulting services consist of fixed fees ranging from \$900-\$10,000 annually, hourly charges ranging from \$250-\$800 per hour, and/or asset based management fees ranging from 0.35%-0.60% of the market value of the plan's assets, and (ii) the fee schedule for asset-based portfolio management of Investment-Only Variable Annuity contracts. The fees may be negotiable in certain cases at the discretion of CSPW.

We have added tax preparation and planning services offered through an unaffiliated third-party accounting and tax planning firm. Please see Item 4 and Item 5 for additional information.

We will ensure that you receive a summary of any material changes to this and subsequent Disclosure Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary and will further provide you with a new Disclosure Brochure as necessary based on changes or new information, at any time, without charge.

Currently, our Disclosure Brochure may be requested by contacting Alejandro J. Haas at (480) 359-4964 or by email to info@coppersquarepw.com.

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Copper Square Private Wealth, LLC.

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Item 4: Advisory Business

Description of Advisory Firm

Copper Square Private Wealth, LLC (hereinafter referred to as “CSPW”, “we”, “firm”, and “us”) became registered as an Investment Adviser with the State of Arizona in 2021. Alejandro J. Haas is the principal owner of CSPW.

Types of Advisory Services

Investment Management Services

We are in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a client regarding the investment of client funds based on the individual needs of the client. Through personal discussions in which goals and objectives based on a client's particular circumstances are established, we develop a client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation targets. We will also review and discuss a client's prior investment history, as well as family composition and background.

Account supervision is guided by the stated objectives of the client (e.g., maximum capital appreciation, growth, income, or growth, and income), as well as tax considerations, clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

We use a third-party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of client funds since we do not have direct access to client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the platform. Once the client account(s) is connected to the platform, the advisor will review the current account allocations. When deemed necessary, the advisor will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

Investment Management using a Sub-Advisor

We offer the use of third-party managers, outside managers, or sub-advisors (TAMPs) for portfolio management services. We assist clients in selecting an appropriate asset allocation model, completing the outside manager's investor profile questionnaire, interacting with the outside manager and reviewing the outside manager. Our review process and analysis of outside managers is further discussed in Item 8 of this Form ADV Part 2A. Additionally, we will meet with the Client on a periodic basis to discuss changes in their personal or financial situation, suitability, and any new or revised restrictions to be applied to the account. Fees pertaining to this service are outlined in Item 5 of this brochure.

Financial Planning and Consulting Services

We provide financial planning services on topics such as business planning, cash flow & debt management, college savings, employee benefits optimization, estate planning, financial goals, insurance, investment analysis, retirement planning, risk management, tax planning, and pension consulting services.

Financial planning involves an evaluation of a client's current and future financial state by using currently known variables to predict future cash flows, asset values, and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information, and analysis will be considered as they affect and are affected by the entire financial and life situation of the client. Clients purchasing this service will receive a written or an electronic report, providing the client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

In general, the financial plan will address any or all of the following areas of concern. The Client and advisor will work together to select specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Cash Flow and Debt Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute to grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts, and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts. We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.
- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.

- **Insurance:** Review of existing policies to ensure proper coverage for life, health, disability, long-term care, liability, home, and automobile.
- **Investment Analysis:** This may involve developing an asset allocation strategy to meet Clients' financial goals and risk tolerance, providing information on investment vehicles and strategies, reviewing employee stock options, as well as assisting you in establishing your own investment account at a selected broker/dealer or custodian. The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.
- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (e.g., working longer, saving more, spending less, taking more risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance ("self-insuring").
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their "tax efficiency," with the consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

- **Pension/Profit Sharing Plan Consulting Services:** We provide pension consulting services to employer plan sponsors. Generally, such pension 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 include: investment options, plan structure and participant education.

All pension consulting services shall be in compliance with the applicable state law(s) regulating the services provided by this Agreement.

Interest-Only Variable Annuity

The Investment-Only Variable Annuity (or IOVA) is a financial planning tool we use for clients where tax-deferred growth on larger sums of taxable money is a primary concern. When we can meet client investing goals on long term horizons best with the help of an IOVA, we may recommend them as part of our financial planning approach.

These IOVA contracts do not carry commissions in keeping with our fee-only practice. We receive no extra financial benefit from clients choosing this option over other investment options, as our fees for investment and planning advice are consistent and transparent across all platforms we advise clients on. This lack of sometimes costly commissions compared to variable annuities helps keep the cost of using this solution to a reasonable expense for our clients.

Pontera

We use a third party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of client funds since we do not have direct access to client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the client allowing them to connect an account(s) to the platform. Once the client account(s) is connected to the platform, the advisor will review the current account allocations. When deemed necessary, the advisor will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market conditions. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

Retirement Account Advice

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

Tax Preparation & Tax Planning

We offer tax preparation services to our ongoing financial planning clients and our investment management clients to assist with the filing of federal and state tax returns for individuals, trusts, and businesses.

Tax Preparation & Tax Planning are not available as stand-alone services.

The fees associated with tax preparation and tax planning services are separate and in addition to your ongoing financial planning or advisory fees and are disclosed in Item 5.

We will utilize the services of XY Tax Solutions “XYTS”, a third-party accounting and tax planning firm, to facilitate the preparation and filing of your tax return and we will work with you and XYTS to gather the necessary information as part of this service. If the client also engages us for Tax Planning Services, XYTS’s licensed CPAs will work with the client to also conduct research and answer tax-related questions to help the client adequately plan through certain transactions and financial changes so that they can fully understand any tax consequences or opportunities for savings in the future.

Client Tailored Services and Client Imposed Restrictions

We consult with clients initially and on an ongoing basis, through the duration of their engagement with us, to determine risk tolerance, time horizon and other factors that may impact the clients’ investment and/or planning needs. We ensure that clients’ investment and planning recommendations are suitable for their needs, goals, objectives, and risk tolerance.

Clients are able to specify, within reason, any limitations they would like to place on discretionary authority as it pertains to individual securities and/or sectors that will be traded in their account. All such requests must be provided to CSPW in writing. CSPW will notify Clients if they are unable to accommodate any requests.

Wrap Fee Programs

We do not participate in wrap fee programs.

Assets under Management

CSPW currently reports \$96,620 discretionary or non-discretionary Assets Under Management. Assets Under Management were calculated as of December 31, 2022.

Item 5: Fees and Compensation

Please note, unless a client has received this brochure at least 48 hours prior to signing an investment advisory and/or a Financial Planning Agreement (collectively, “Client Contract”), the Client Contract may be terminated by the client within five (5) business days of signing the client contract without incurring any fees. How we are paid depends on the type of advisory services we perform. Below is a brief description of our fees, however, you should review your executed client contract for more detailed information regarding the exact fees you will be paying.

Investment Management Services

Our standard advisory fee is based on the market value of the assets under management and is calculated as follows:

Account Value	Annual Advisory Fee
\$1 - \$499,999	1.75%
\$500,000 - \$999,999	1.00%
\$1,000,000 - \$4,999,999	0.80%
\$5,000,000 and Above	Negotiable

The annual fees are negotiable, prorated and paid in advance on a quarterly basis. The advisory fee is a tiered fee and is calculated according to the above chart and applying the fee to the account value as of the last day of the quarter. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts, or the client may choose to pay by check, electronic funds transfer or debit/credit card. When a Sub-Advisor is used, the Sub-Advisor will debit the client's account for the advisory fee. Please note, the fee table above represents the total fee for this service; clients will not pay an additional fee when using a Sub-Advisor. CSPW will pay the following fees when a Sub-Advisor is used:

Firm Assets Under Management	Annual Advisory Fee
\$0 to \$5,000,000	0.35%
\$5,000,001 to \$25,000,000	0.30%
Above \$25,000,001	0.25%

Accounts initiated or terminated during a calendar quarter will be charged a prorated fee based on the amount of time remaining in the billing period. An account may be terminated with written notice at least 15 calendar days in advance. Upon termination of the account, any unearned fee will be refunded to the Client.

Investment-Only Variable Annuity Fees

Firm Assets Under Management	Annual Advisory Fee
\$1 to \$499,999	1.75%
\$500,000 to \$999,999	1.00%
\$1,000,000 to \$4,999,999	0.80%
\$5,000,000 and Above	Negotiable

The annual fees are negotiable, prorated and paid in advance on a quarterly basis. The advisory fee is a tiered fee and is calculated according to the above chart and applying the fee to the account value as of the last day of the quarter. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts, or the client may choose to pay by check, electronic funds transfer or debit/credit card.

In addition to the fees charged by CSPW, the insurance carrier may charge a nominal monthly fee.

Hourly Financial Planning

Financial Planning engagements are offered at an hourly rate of \$350 per hour. The fee may be negotiable in certain cases and is due upon completion of the engagement. In the event of early termination by the client, any fees for the hours already worked will be due. Fees for this service may be paid by check, electronic funds transfer or debit/credit card.

Flat-Fee Project Based Financial Planning

Fees for Flat-Fee Project-Based Financial Planning range between \$1,500 and \$10,000. Fees are based on complexity and scope of the engagement, and may be negotiable. Half of the fee is due at the beginning of the process and the remainder is due at completion of work, however, CSPW will not bill an amount above \$500 more than 6 months in advance. Fees for this service may be paid by check, electronic funds transfer or debit/credit card. In the event of early termination any prepaid but unearned fees will be refunded and any completed deliverables of the project will be provided to the Client.

Ongoing Comprehensive Financial Planning

This service involves working one-on-one with a financial planner over an extended period of time. By paying a fixed monthly fee, clients get to work with a financial planner who will work with them to develop and implement their plan. The financial planner will monitor the plan, recommend any changes and ensure the plan is up-to-date.

Ongoing Comprehensive Financial Planning consists of an ongoing flat fee that is paid monthly, in arrears, at a rate between \$250-\$800 per month, based on the client's financial complexity. The fee may be negotiable in certain cases at the discretion of CSPW. Fees for this service may be paid by electronic funds transfer (EFT) or check. This service may be terminated by either party with 30 days written notice. Upon termination, the fee will be prorated and any unearned fees will be refunded to the client.

Pension Consulting Services Fees

Our fees for pension consulting services consist of fixed fees ranging from \$900-\$10,000 annually, hourly charges ranging from \$250-\$800 per hour, and/or asset based management fees ranging from 0.35%-0.60% of the market value of the plan's assets. Fixed fees and asset based management fees are payable monthly or quarterly, in advance, as may be agreed with the client in our written investment advisory agreement. Where an hourly fee applies, such fees are invoiced to the client monthly or quarterly, in arrears, as may be agreed with the client in our written investment advisory agreement. The specific fee structure and rate applicable to the client's account will vary based upon the nature of the pension consulting services selected, complexity of the engagement, and our expectation of the time and resources necessary to provide services to the client, among other factors. Fees may vary outside the typical ranges stated above.

Our fixed and asset based management fees for pension consulting services will be invoiced to the client at the beginning of each period either in paper or electronic form, and shall be due within 10 days from the date of our invoice. At the client's option, we may be authorized to be paid directly from the client's account(s) at the qualified custodian. In the event we are authorized to be paid directly in this manner, we will only do so where (i) the client provides us with written authorization for the same; (ii) we send the qualified custodian written notice of the amount of the fee to be deducted from the client's account; and (iii) we send the client a written invoice itemizing our advisory fees, including the formula used to calculate such fees, the time period covered by the fees, and the amount of assets under management on which such fees are based. Fees for any partial periods shall be prorated based on the number of days in the period that services are provided. The fee will be equal to the amount

as described in our written investment advisory agreement with the client. Where an asset based management fee applies, our fees shall be based on the average daily value of the client/plan's accounts during the previous billing period.

Unless the client has received our firm's Disclosure Brochure at least 48 hours prior to signing the investment advisory contract with our firm, the client may terminate the advisory agreement within 5 business days of the date of execution without penalty. After the 5 day period, the agreement may be terminated by any of the parties to the agreement by providing 30 days written notice to the other parties. Upon termination, fees will be prorated and any unearned fees will be refunded to the client. Any fees accrued but not yet assessed to the account will be assessed prior to the termination of the agreement.

Tax Preparation & Tax Planning

XYTS will bill you directly for Tax Preparation and Planning services. Their fees will be reviewed and agreed to in your agreement with them at the start of the engagement.

Other Types of Fees and Expenses

Our fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer, and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual fund and exchange-traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees, and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that we consider in selecting or recommending broker-dealers for client's transactions and determining the reasonableness of their compensation (e.g., commissions).

We do not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

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

We do not offer performance-based fees and do not engage in side-by-side management.

Item 7: Types of Clients

We provide financial planning and portfolio management services to individuals, high net-worth individuals, pension and profit sharing plans, and corporations or other businesses.

Our minimum account size requirement for investment management services is \$500,000, which may be waived at the firm's discretion.

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

Modern Portfolio Theory

The underlying principles of MPT are:

- Investors are risk averse. The only acceptable risk is that which is adequately compensated by an expected return. Risk and investment return are related and an increase in risk requires an increased expected return.
- Markets are efficient. The same market information is available to all investors at the same time. The market prices every security fairly based upon this equal availability of information.
- The design of the portfolio as a whole is more important than the selection of any particular security. The appropriate allocation of capital among asset classes will have far more influence on long-term portfolio performance than the selection of individual securities.
- Investing for the long-term (preferably longer than ten years) becomes critical to investment success because it allows the long-term characteristics of the asset classes to surface.
- Increasing diversification of the portfolio with lower correlated asset class positions can decrease portfolio risk. Correlation is the statistical term for the extent to which two asset classes move in tandem or opposition to one another.

Passive Investment Management

We primarily practice passive investment management. Passive investing involves building portfolios that are composed of various distinct asset classes. The asset classes are weighted in a manner to achieve the desired relationship between correlation, risk, and return. Funds that passively capture the returns of the desired asset classes are placed in the portfolio. The funds that are used to build passive portfolios are typically index mutual funds or exchange-traded funds.

Passive investment management is characterized by low portfolio expenses (i.e. the funds inside the portfolio have low internal costs), minimal trading costs (due to infrequent trading activity), and relative tax efficiency (because the funds inside the portfolio are tax efficient and turnover inside the portfolio is minimal).

In contrast, active management involves a single manager or managers who employ some method, strategy or technique to construct a portfolio that is intended to generate returns that are greater than the broader market or a designated benchmark.

Use of Outside Managers: We may refer Clients to third-party investment advisers ("outside managers"). Our analysis of outside managers involves the examination of the experience, expertise, investment philosophies, and past performance of the outside managers in an attempt to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. We monitor the manager's underlying holdings, strategies, concentrations, and leverage as part of our overall periodic risk assessment. Additionally, as part of our due diligence process, we survey the manager's compliance and business enterprise risks. A risk of investing with an outside manager who has been successful in the past is that he or she may not be able to replicate that success in the future. In addition, as we do not control the underlying investments in an outside manager's portfolio. There is also a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our Clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities, and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions, we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying power of your investment portfolio, even if the dollar value of your investments remains the same.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but

rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on factors such as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected. ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are delisted from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which the Clients invest.

Mutual Funds: When a Client invests in open-end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives).

Item 9: Disciplinary Information

Criminal or Civil Actions

CSPW and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

CSPW and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

CSPW and its management have not been involved in legal or disciplinary events that are material to a Client's or prospective Client's evaluation of CSPW or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

No CSPW employee is registered, or has an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

No CSPW employee is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator or a commodity trading advisor.

CSPW does not have any related parties. As a result, we do not have a relationship with any related parties.

CSPW only receives compensation directly from Clients. We do not receive compensation from any outside source. We do not have any conflicts of interest with any outside party.

Alejandro J. Haas is currently a licensed insurance agent, however, he no longer sells any insurance products, and is not affiliated with any insurance companies. Alejandro J. Haas will not sell any insurance products to clients or prospective clients of CSPW.

Recommendations or Selections of Other Investment Advisers

As referenced in Item 4 of this brochure, CSPW recommends Clients to Outside Managers to manage their accounts. You are not obligated, contractually or otherwise, to use the services of any Outside Manager we recommend. Additionally, CSPW will only recommend an Outside Manager who is properly licensed or registered as an investment adviser.

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

As a fiduciary, our firm and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings. The firm also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc., and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

Code of Ethics Description

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients. A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to Clients.
- Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.

- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matters shall reflect the credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

We periodically review and amend our Code of Ethics to ensure that it remains current, and we require all firm access persons to attest to their understanding of and adherence to the Code of Ethics at least annually. Our firm will provide a copy of its Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflicts of Interest

Neither our firm, its associates or any related person is authorized to recommend to a Client or effect a transaction for a Client, involving any security in which our firm or a related person has a material financial interest, such as in the capacity as an underwriter, adviser to the issuer, etc.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to Clients for their accounts. In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates’ transactions in specific reportable securities transactions. Any exceptions or trading pre-clearance must be approved by the firm principal in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Trading Securities At/Around the Same Time as Client’s Securities

From time to time, our firm or its “related persons” may buy or sell securities for themselves at or around the same time as Clients. We will not trade non-mutual fund securities 5 days prior to the same security for Clients.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

Copper Square Private Wealth, LLC does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to the Client based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

In recommending broker-dealers, we have an obligation to seek the “best execution” of transactions in Client accounts. The determinative factor in the analysis of best execution is not the lowest possible commission cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of the broker-dealer’s services. The factors we consider when evaluating a broker-dealer for best execution include, without limitation, the broker-dealer’s:

- Execution capability;
- Commission rate;
- Financial responsibility;
- Responsiveness and customer service;
- Custodian capabilities;

- Research services/ancillary brokerage services provided; and
- Any other factors that we consider relevant.

With this in consideration, our firm recommends Charles Schwab Institutional (“Charles Schwab”), an independent and unaffiliated SEC registered broker-dealer firm and member of the Financial Industry Regulatory Authority (“FINRA”) and the Securities Investor Protection Corporation (“SIPC”). Although clients may request us to use a broker-dealer of their choosing, we generally recommend that clients open brokerage accounts with Charles Schwab. We are not affiliated with Charles Schwab. The Client will ultimately make the final decision of the Custodian to be used to hold the Client’s investments by signing the selected broker-dealer’s account opening documentation.

1. Research and Other Soft-Dollar Benefits

Our qualified custodian(s) used for investment management may provide us with certain brokerage and research products and services that qualify as “brokerage or research services” under Section 28(e) of the Securities Exchange Act of 1934 (“Exchange Act”). This is commonly referred to as a “soft dollar” arrangement. These research products and/or services will assist us in our investment decision making process. Such research generally will be used to service all of our client accounts, but brokerage charges paid by the client may be used to pay for research that is not used in managing that specific client’s account.

2. Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for Clients to use, however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve the most favorable execution of Client transactions and this may cost Clients money over using a lower-cost custodian.

The Custodian and Brokers We Use (Charles Schwab)

Advisor participates in the Charles Schwab Institutional program. Charles Schwab Institutional is a division of The Charles Schwab Corporation. ("Charles Schwab"), member FINRA/SIPC. Charles Schwab is an independent [and unaffiliated] SEC-registered broker-dealer. Charles Schwab offers independent investment Advisors services which include custody of securities, trade execution, clearance, and settlement of transactions. Advisor receives some benefits from Charles Schwab through its participation in the program. (Please see the disclosure under Item 14 below.)

Advisor participates in Charles Schwab’s institutional customer program and Advisor may recommend Charles Schwab to Clients for custody and brokerage services. There is no direct link between Advisor’s participation in the program and the investment advice it gives to its Clients, although Advisor receives economic benefits through its participation in the program that are typically not available to Charles Schwab 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 Advisor 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 Advisor by third party vendors. Charles Schwab may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by Charles Schwab through the program may benefit Advisor but may not benefit its Client accounts. These products or services may assist Advisor in managing and administering Client accounts, including accounts not maintained at Charles Schwab. Other services made available by Charles Schwab are intended to help Advisors manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in the program do not depend on the number of brokerage transactions directed to Charles Schwab. As part of its fiduciary duties to Clients, Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of Charles Schwab for custody and brokerage services.

The Custodian and Brokers We Use (Charles Schwab)

The custodian and brokers we use maintain custody of your assets that we manage, although we may be deemed to have limited custody of your assets due to our ability to withdraw fees from your account (see Item 15 – Custody, below).

We recommend that our clients use Charles Schwab & Co., Inc. ("Charles Schwab"), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Charles Schwab. Charles Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. While we recommend that you use Charles Schwab as custodian broker, you will decide whether to do so and will open your account with Charles Schwab by entering into an account agreement directly with them. We do not open the account for you, although we may assist you in doing so. Even though your account is maintained at Charles Schwab, we can still use other brokers to execute trades for your account as described below (see "Your brokerage and custody costs").

How we select brokers/custodians

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

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability

- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Charles Schwab”)

Your brokerage and custody costs

For our clients’ accounts that Charles Schwab maintains, Charles Schwab generally does not charge you separately for custody services but is compensated by charging you commissions or other fees on trades that it executes or that settle into your Charles Schwab account. Certain trades (for example, many mutual funds and ETFs) may not incur Schwab commissions or transaction fees. Charles Schwab is also compensated by earning interest on the uninvested cash in your account in Charles Schwab’s Cash Features Program.

Products and services available to us from Charles Schwab

Schwab Advisor Services™ is Charles Schwab’s business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Charles Schwab retail customers. Charles Schwab also makes available various support services. Some of those services help us manage or administer our clients’ accounts, while others help us manage and grow our business. Charles Schwab’s support services are generally available on an unsolicited basis (we don’t have to request them) and at no charge to us. Following is a more detailed description of Charles Schwab’s support services:

Services that benefit you

Charles Schwab’s institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab’s services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you

We may have an incentive to select or recommend a broker-dealer based on our interest in receiving the research or other products or services, rather than on your clients’ interest in receiving the most favorable execution. We receive a benefit because we do not have to produce or pay for the research, products or services available through Charles Schwab. Charles Schwab makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients’ accounts. They include investment research, both Charles Schwab’s own and that of third parties. We may use this research to service all or a substantial number of our clients’ accounts, including accounts not maintained at Charles Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients’ accounts
- assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us

Charles Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession do not require that you maintain your account with Charles Schwab, based on our interest in receiving Schwab's services that benefit our business and Charles Schwab's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Charles Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Charles Schwab's services (see "How we select brokers/ custodians") and not Charles Schwab's services that benefit only us.

Aggregating (Block) Trading for Multiple Client Accounts

Investment advisers may elect to purchase or sell the same securities for several clients at approximately the same time when they believe such action may prove advantageous to clients. This process is referred to as aggregating orders, batch trading or block trading. We do not engage in block trading. It should be noted that implementing trades on a block or aggregate basis may be less expensive for client accounts; however, it is our trading policy to implement all client orders on an individual basis. Therefore, we do not aggregate or "block" client transactions. Considering the types of investments we hold in advisory client accounts, we do not believe clients are hindered in any way because we trade accounts individually. This is because we develop individualized investment strategies for clients and holdings will vary. Our strategies are primarily developed for the long-term and minor differences in price execution are not material to our overall investment strategy.

Item 13: Review of Accounts

Alejandro J. Haas, Managing Member and CCO of CSPW, will work with Clients to obtain current information regarding their assets and investment holdings and will review this information as part of our financial planning services. CSPW does not provide specific reports to financial planning Clients, other than financial plans.

Client accounts with the Investment Advisory Service will be reviewed regularly on a quarterly basis by Alejandro J. Haas, Managing Member and CCO. The account is reviewed with regards to the Client's investment policies and risk tolerance levels. Events that may trigger a special review would be unusual performance, addition or deletions of Client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per Client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

CSPW will provide written reports to Investment Advisory Clients on a quarterly basis.

Item 14: Client Referrals and Other Compensation

We do not receive any economic benefit, directly or indirectly, from any third party for advice rendered to our Clients. Nor do we, directly or indirectly, compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

CSPW does not accept custody of Client funds except in the instance of withdrawing Client fees.

For Client accounts in which CSPW directly debits their advisory fee:

- i. CSPW will send a copy of its invoice to the custodian at the same time that it sends the Client a copy.
- ii. The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
- iii. The Client will provide written authorization to CSPW, permitting them to be paid directly for their accounts held by the custodian.

Clients should receive at least quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the billing invoices we provide. Our billing invoices may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

Item 16: Investment Discretion

For those Client accounts where we provide Investment Management Services, we maintain discretion over Client accounts with respect to securities to be bought and sold and the amount of securities to be bought and sold. Investment discretion is explained to Clients in detail when an advisory relationship has commenced. At the start of the advisory relationship, the Client will execute a Limited Power of Attorney, which will grant our firm discretion over the account. Additionally, the discretionary relationship will be outlined in the advisory contract and signed by the Client.

Item 17: Voting Client Securities

We do not vote Client proxies. Therefore, Clients maintain exclusive responsibility for: (1) voting proxies, and (2) acting on corporate actions pertaining to the Client's investment assets. The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets. If the Client would like our opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

Registered Investment Advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$500 in fees per Client six months in advance.

Item 19: Requirements for State-Registered Advisers

Alejandro J. Haas

Born: 1973

Educational Background

- 1996 - Bachelor of Science in Business Administration, The University of Arizona

Business Experience

- 03/2021 - Present, Copper Square Private Wealth, LLC, Managing Member and CCO
- 01/2020 - Present, Opendoor Technologies Inc., Customer Experience Advisor
- 11/2015 - 12/2020, Cetera Advisors, Registered Rep/IAR
- 11/2013 - 10/2015, BMO Harris Financial Advisors, Financial Advisor
- 07/2012 - 10/2013, Edward Jones, Financial Advisor
- 05/2012 - 06/2012, Unemployed
- 09/2010 - 04/2012, Merrill Lynch, Pierce, Fenner & Smith, Inc., Financial Advisor
- 09/2010 - 04/2012, Bank of America, NA, Financial Advisor

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: 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 71,000 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 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.

CIMA® – Certified Investment Management Analyst The CIMA® certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application.

Prerequisites for the CIMA® certification are three (3) years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must pass online. Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider and AACSB-accredited university business school, and pass an online Certification Examination. CIMA® designees are required to adhere to IMCA's Code of Professional Responsibility, Standards of Practice, and Rule and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two (2) ethics hours, every two (2) years to maintain certification. The designation is administered through the Investment Management Consultants Association (IMCA®). For more information, visit www.investmentsandwealth.org.

Other Business Activities

Alejandro J. Haas is currently employed as a Customer Experience Advisor at Opendoor Technologies, Inc. This activity accounts for approximately 60% of his time.

Performance-Based Fees

CSPW is not compensated by performance-based fees.

Material Disciplinary Disclosures

No management person at Copper Square Private Wealth, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Material Relationships That Management Persons Have With Issuers of Securities

Copper Square Private Wealth, LLC, nor Alejandro J. Haas, have any relationship or arrangement with issuers of securities, in addition to what is described in Item 10.

Additional Compensation

Alejandro J. Haas does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through CSPW.

Supervision

Alejandro J. Haas, as Managing Member and Chief Compliance Officer of CSPW, is responsible for supervision. He may be contacted at the phone number on this brochure supplement.

Requirements for State Registered Advisers

Alejandro J. Haas has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.



Copper Square Private Wealth, LLC

2 N. Central Ave., Suite 1800
Phoenix, Arizona 85004

Phone: (480) 359-4964

Email: info@coppersquarepw.com

Form ADV Part 2B Brochure Supplement

Dated February 16, 2023

For

Alejandro J. Haas 2851360

Managing Member, and Chief Compliance Officer

This brochure supplement provides information about Alejandro J. Haas that supplements Copper Square Private Wealth, LLC (“CSPW”) brochure. A copy of that brochure precedes this supplement. Please contact Alejandro J. Haas if the CSPW brochure is not included with this supplement or if you have any questions about the contents of this supplement.

Additional information about Alejandro J. Haas is available on the SEC’s website at www.adviserinfo.sec.gov which can be found using the identification number #2851360.

Item 2: Educational Background and Business Experience

Alejandro J. Haas

Born: 1973

Educational Background

- 1996 - Bachelor of Science in Business Administration, The University of Arizona

Business Experience

- 03/2021 - Present, Copper Square Private Wealth, LLC, Managing Member and CCO
- 01/2020 - Present, Opendoor Technologies Inc., Customer Experience Advisor
- 11/2015 - 12/2020, Cetera Advisors, Registered Rep/IAR
- 11/2013 - 10/2015, BMO Harris Financial Advisors, Financial Advisor
- 07/2012 - 10/2013, Edward Jones, Financial Advisor
- 05/2012 - 06/2012, Unemployed
- 09/2010 - 04/2012, Merrill Lynch, Pierce, Fenner & Smith, Inc., Financial Advisor
- 09/2010 - 04/2012, Bank of America, N.A., Financial Advisor

Professional Designations, Licensing & Exams

CFP®-Certified Financial Planner: 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 71,000 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 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.

CIMA®–Certified Investment Management Analyst: The CIMA® certification signifies that an individual has met initial and on-going experience, ethical, education, and examination requirements for investment management consulting, including advanced investment management theory and application.

Prerequisites for the CIMA® certification are three (3) years of financial services experience and an acceptable regulatory history. To obtain the CIMA® certification, candidates must pass online. Qualification Examination, successfully complete a one-week classroom education program provided by a Registered Education Provider and AACSB-accredited university business school, and pass an online Certification Examination. CIMA® designees are required to adhere to IMCA’s Code of Professional Responsibility, Standards of Practice, and Rule and Guidelines for Use of the Marks. CIMA® designees must report 40 hours of continuing education credits, including two (2) ethics hours, every two (2) years to maintain certification. The designation is administered through the Investment Management Consultants Association (IMCA®). For more information, visit www.imca.org.

Item 3: Disciplinary Information

No management person at Copper Square Private Wealth, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Alejandro J. Haas is currently employed as the Customer Experience Advisor at Opendoor Technologies Inc. This activity accounts for approximately 60% of his time.

Item 5: Additional Compensation

Alejandro J. Haas does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through CSPW.

Item 6: Supervision

Alejandro J. Haas, as Managing Member and Chief Compliance Officer of CSPW, is responsible for supervision. He may be contacted at (480) 359-4964.

Item 7: Requirements for State Registered Advisers

Alejandro J. Haas has NOT been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or a bankruptcy petition.