

We are Copper Beech Capital, LLC ("CBC"), a FINRA-registered broker-dealer. Investment advisory and brokerage services and fees differ, and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/crs), which also provides educational materials about broker-dealers, investment advisers, and investing. Our firm and financial professionals' registration information are also publicly available on the [Investor.gov](https://www.investor.gov) website.

What investment services and advice can you provide me?

We offer brokerage services to high net worth clients and to a variety of corporate and legal entities, such as trusts, IRAs, partnerships, and small companies. We recommend an appropriate private placement or insurance product to you and assist you in completing the necessary application and paperwork, including obtaining a suitability form as required by our primary regulator, FINRA. Our services are non-discretionary in nature and do not involve us taking any discretion on the purchase or sale of securities. We offer advice specifically with respect to private placement securities and insurance products, such as variable life insurance and variable annuities.

We do not provide monitoring services for your brokerage account. Your financial advisor, however, may periodically review your account for purposes of making a buy, sell, or hold recommendation.

For additional information on our services, please see our Regulation Best Interest Disclosure Statement below.

Other Questions You May Have

Given my financial situation, should I choose an investment advisory service? Should I choose a brokerage service? Should I choose both types of services? Why or why not?

How will you choose investments to recommend to me?

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

What fees will I pay?

Our fees for insurance-related securities transactions are commission based so that we and the insurer only generate revenue when you effect a transaction. Commissions may vary depending on the type of product and the product features, which are numerous and complex.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For additional information on our fees, please see our Regulation Best Interest Disclosure Statement below.

Other Questions You May Have

Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation, we must act in your best interest and not put our interests ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts, because they can affect the investment advice we provide you. Here are examples to help you understand what this means.

- Commissions create an incentive for us to recommend that you engage in more transactions, which may be contrary to your interests. Please be mindful of the features within the insurance product you are considering and ask your CBC representative about the conflicts of interest, commission costs, and adverse impacts that conflicts and fees can have on your investment.
- CBC is affiliated with Copper Beech Financial Group, LLC, an SEC-registered investment adviser. We may recommend that you establish an advisory account with our affiliate for your other investment assets. Please consult with your financial advisor and carefully review this client relationship summary and the public disclosure site at [Investor.gov/CRS](https://www.investor.gov/crs).

For additional information regarding conflicts of interest, please see our Regulation Best Interest Disclosure Statement below.

Other Questions You May Have

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

How do your financial professionals make money?

Our financial advisors are paid a salary and bonus. We have an economic incentive to effect a higher number of transactions in your brokerage account or utilize securities or investment products or strategies that carry higher commission costs or fees. We do not receive non-cash compensation.

Do you or your financial professionals have legal or disciplinary history?

No for our firm and yes for certain of our financial professionals. To determine if a particular financial professional who is registered with FINRA has a disciplinary history, please go to <https://brokercheck.finra.org/> or [Investor.gov/CRS](https://investor.gov/CRS) to research CBC and its financial professionals.

Other Questions You May Have

As a financial professional, do you have any disciplinary history? For what type of conduct?

You can find additional information about our brokerage services on our Regulation Best Interest Disclosure Statement below. You may contact us at 856-988-8300 or via email to mparise@cbfgllc.com if you have questions or to request a current copy of this Relationship Summary.

Other Questions You May Have

Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?

Regulation Best Interest Disclosure Statement

You are receiving this disclosure statement because you have either received a recommendation from our broker-dealer division or you have elected to open a retail brokerage account through Copper Beech Capital, LLC ("CBC"). We are acting as your broker-dealer to provide brokerage services. You acknowledge that you have received the CBC Client Relationship Summary. Please see the following description of our brokerage services and related conflicts of interest.

Services

We offer the following services to high net worth clients and to a variety of corporate and legal entities, such as trusts, IRAs, partnerships, and small companies. We offer various insurance products such as variable life products. We do not engage in a retail securities business and do not hold customer accounts. You may obtain information on our firm by accessing [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research our firm and our financial professionals.

We offer advice exclusively on private placements and insurance products. Our services are consultative in nature and do not involve us taking any discretion on the purchase or sale of securities. With respect to insurance activity, we are appointed by several well capitalized insurance carriers. These insurance products generally have an investment component in which we offer investment advice and may charge an advisory fee through our investment adviser affiliate, Copper Beech Capital, LLC. In addition to a careful review of the offering documents, you are advised to consult with your financial, legal, and tax advisors prior to investment.

Securities Recommendations

We recommend investments based upon your individual suitability requirements, such as individual circumstances, liquid net worth, total net worth, annual income, expectation of current and future cash needs, investment objective, and risk tolerance. We will only approach investors for whom we have a pre-existing substantive relationship who desire risk management services.

Portfolio Monitoring

We do not provide monitoring services for your brokerage account. Your financial advisor, however, may periodically review your account for purposes of making a buy, sell, or hold recommendation.

Costs & Related Conflicts

Our fees for private placements are disclosed in the offering documents and insurance contracts provided to each prospective investor with a subscription form. Our private placement insurance and annuity offerings are offered only to accredited and qualified investors. Our fees are either upfront commission payments or annuitized payments, as premiums are paid by the insured. In addition, we may provide advice on the investment sub-accounts through our investment adviser affiliate, Copper Beech Financial Group, LLC.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

How Copper Beech Capital Makes Money

We must act in your best interest and not put our interests ahead of yours. The way we make money creates some conflicts of interest. If we sell a variable life policy to you with an investment sub-account, we will earn commissions on the sale of the product and possibly an advisory fee on the investment sub-account. In this regard we have a conflict of interest, as we are incentivized to recommend products that have investment sub-accounts that we can manage for a fee.

When we provide you with a recommendation, 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. You should understand and ask us about these conflicts, because they can affect the investment advice we provide you. Here is an example to help you understand what this means:

- Conflicts of interest can incentivize us to put our interests ahead of yours. We manage these conflicts through disclosures in the offering and subscription documents. In addition, we employ supervisory procedures to ensure our financial advisors are acting in your best interest.

Additional Disclosure Materials

There are additional disclosure materials available to you that supplement this disclosure statement. When you purchase an insurance product, there is a contract that you enter into with the insurance carrier which includes disclosures regarding the operation of the insurance policy, death benefits, risks, conditions, riders, and the legal obligations you and the carrier have with respect to your insurance policy. You are encouraged to read this material and consult your financial advisor with any questions you have.

Financial Advisor Compensation

Our financial advisors are paid a salary and bonus. We have an economic incentive to effect a higher number of transactions in your brokerage account or utilize securities or investment products or strategies that carry higher commission costs or fees. We do not receive non-cash compensation.

Disciplinary History

No for our firm and yes for certain of our financial professionals. To determine if a particular financial professional who is registered with FINRA has a disciplinary history, please go to <https://brokercheck.finra.org/> or [Investor.gov/CRS](https://investor.gov/CRS) to research CBC and its financial professionals.

Additional Information

You can find additional information about our brokerage services at [Investor.gov/CRS](https://investor.gov/CRS). You may contact us at 856-988-8300 or via email to mparise@cbfgllc.com.