Item 1: Cover Page for Part 2B of Form ADV: Brochure Supplement October 2019

Stephen Russell Coupe (CRD #2061979)

Copper Financial Group 4550 NW Newberry Hill Rd #101 Silverdale, WA 98383

> Firm Contact: Joseph Gates Chief Compliance Officer

> Firm Website Address: <u>www.ClearCreekFM.com</u>

This brochure supplement provides information about Mr. Coupe that supplements our brochure. You should have received a copy of that brochure. Please contact Mr. Gates if you did not receive our firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Mr. Coupe is available on the SEC's website at <u>www.adviserinfo.sec.gov</u>.

Item 2: Educational Background & Business Experience

Stephen Russell Coupe Year of Birth: 1961

Educational Background:

- 1982: University of Maine; Economics; No degree obtained
- 1984: Olympic College; Business; Business; No degree obtained
- 1985: Chapman College; Business; No degree obtained
- 1989: University of Rhode Island; Business; No degree obtained

Business Background:

- 08/2018 Present Clear Creek Financial Management, LLC dba Copper Financial Group;
 - Investment Advisor Representative
- 04/2017 08/2018 Sabbatical
- 07/2012 04/2017 First Allied Advisory Services, Inc.; Mass Transfer Investment Advisor Representative
- 12/2008 04/2017 First Allied Securities, Inc.; Mass Transfer
- 12/1996 12/2008 First Montauk Securities Corp.; Registered Representative

Exams, Licenses & Other Professional Designations:

- 1990: Series 6 & 63
- 1997: Series 7
- 2004: Series 24
- 2005: Series 4
- 2006: Series 65

Item 3: Disciplinary Information¹

In July of 2018, the State of Washington Department of Financial Institutions Securities Division issued a Consent Order after finding Mr. Coupe exercised unauthorized discretion in brokerage client accounts at his prior firm. Mr. Coupe was ordered to pay a fine of \$5,000 and costs of \$1,000.

Item 4: Other Business Activities

Mr. Coupe is a loan consultant at loanDepot where his duties include consulting with clients regarding home loans. He spends approximately 30 hours per month during non-trading hours on this investment related activity.

Item 5: Additional Compensation

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

¹ Note: Our firm may, under certain circumstances, rebut the presumption that a disciplinary event is material. If an event is immaterial, we are not required to disclose it. When we review a legal or disciplinary event involving Mr. Coupe to determine whether it is appropriate to rebut the presumption of materiality, we consider all of the following factors: (1) the proximity of Mr. Coupe to the advisory function; (2) the nature of the infraction that led to the disciplinary event; (3) the severity of the disciplinary sanction; and (4) the time elapsed since the date of the disciplinary event. If we conclude that the materiality presumption has been overcome, we prepare and maintain a file memorandum of our determination in our records. We follow SEC rule 204-2(a)(14)(iii) and similar state rules.

Item 6: Supervision

Mr. Gates, Managing Member and Chief Compliance Officer of Clear Creek Financial Management, LLC, supervises and monitors Mr. Coupe's activities on a regular basis to ensure compliance with our firm's Code of Ethics. Please contact Mr. Gates if you have any questions about Mr. Coupe's brochure supplement at (360)308-8239.