Copley Investment Management, LLC Relationship Summary
ADV 3 (Form CRS)
3/11/2026

INTRODUCTION

Copley Investment Management, LLC "CIM" is a Registered Investment Advisor (RIA) registered with the Securities Exchange Commission. *As an Investment advisor, CIM is paid as a percentage of the value of your account. A fee-based arrangement is quite different from a commission structure employed by stockbrokers where the commission depends on the volume of trading in and out of a security.*

RELATIONSHIPS AND SERVICES: *What investment services and advice can you provide me?*

CIM serves a variety of individuals, families, foundations, and small business retirement plans that are seeking financial planning, retirement planning and investment management on a discretionary basis where you give CIM trading authorization via a Limited Power of Attorney. This authorization allows CIM to make trades but not to take money out of your account(s). without your permission.

CIM also manages qualified 401(k) retirement plans. We help plan sponsors to design and oversee the Plan's investment menu and plan structure, and provide financial education on a non-discretionary basis.

Investment Authority: CIM manages 1074 accounts on a discretionary (trading authority) basis and 12 on a (non-trading) non-discretionary basis. The LPOA gives CIM authority to withdraw advisory fees. Invoices are sent to you; Schwab pays out of the account. CIM does not have account minimums.

Monitoring: CIM monitors and rebalances client assets at least quarterly. The professionals at CIM take client education as an integral part of the investment decision-making process.

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

CIM serves clients in various financial situations. Choosing an advisory service comes with many benefits including, but not limited to, help with financial planning and investment management that can be overwhelming to an untrained individual. The financial industry has its own language, which can be confusing, rules, and regulations that an experienced adviser understands in addition to the experience gained by analyzing and comparing different investment strategies. After analyzing, our service helps to avoid paralysis by implementing the plan that is in the best interest of the client.

How will you choose investments to recommend to me?

CIM asks each prospective client to complete a risk tolerance questionnaire. Those answers, in addition to our personal conversations, allow us to select a risk rating score from 1 (no risk) to 10 (high risk). CIM matches the appropriate investment strategy with your risk tolerance.

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

Ronald E. Copley, Founder and President, received his BA in Economics, Old Dominion University (1973), MBA in Management, Old Dominion University (1974), Ph.D in Finance and Real Estate, University of South Carolina (1981), and Charter Financial Analyst (CFA) Charter holder (1986 to present).

Justin Burgess, advisor: Received his Bachelor of Science in Business Administration, UNCW in 2010,

Series 7 (inactive) in 2013, his series 66 in 2014, and CFP in 2023. The Series 7 exam licenses the advisor to sell all types of securities products for a commission, a service that CIM chooses not to offer due to a potential conflict of interest. The Series 66 license qualifies Justin to act as an investment advisor representative to provide investment advice and effect securities transactions for his clients; a role he has been performing at CIM since January 2015. The CERTIFIED FINANCIAL PLANNER® certification has been the standard of excellence for financial planners. CFP® professionals have met extensive training and experience requirements, and commit to CFP Board's ethical standards that require them to put their clients' interest first.

FEES, COSTS, CONFLICTS, AND STANDARD OF CONDUCT: *What fees will I pay? How else do your financial professionals make money?*

Fees are generally not greater than 2% per year, payable quarterly in arrears, of the market value of assets under management, Fees may be negotiable. All fees are payable quarterly. Financial consulting services, including expert witness testimony are billed hourly generally at $250 per hour, Business Valuations and Expert Witness Services are payable at the time of service. CIM never bills investment clients for fees in advance of service except for a retainer in the case of Business Valuations. CIM minimizes all fees in your account by using discount brokerages, mainly Charles Schwab. CIM employes Exchange Traded Funds (ETFs) that include a management fee for the ETF provider. CIM uses no transaction cost securities whenever possible. If you direct CIM to use a full-service broker, CIM attempts to negotiate trade discounts. Most of CIM's clients choose to have their management fee deducted from their account, although a client has the option of paying CIM directly.

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?*

CIM's quarterly management fee depends on your fee arrangement in your "Letter of Agreement" and is deducted from your account at the end of each quarter unless you arrange to pay CIM directly. Each fund also has a net investment expense ratio charged by the fund provider. CIM does not receive any portion of the fees you pay a provider. CIM favors low expenses whenever possible in order to minimize the impact on long-term performance. You will be charged CIM fees and fund management fees each quarter whether you make or lose money on your investments. Any fee you pay reduces the amount of money you make on your investments over time. CIM promotes transparency of its fees in its Letter of Agreement and in our quarterly reports.

Standards Conduct and obligations when CIM acts as your investment advisor.

CIM is obligated to act in your best interest when giving advice and managing client assets. CIM does not have any conflicts of interest, but if a material conflict did exist, Ronald E. Copley would disclose it. CIM employees abide by a "Blackout period" of 2 days when client trades are placed or recommendations are made when CIM professionals are not permitted to place personal securities transactions.

CIM does not pay for referral fees, nor does CIM use performance in any type of advertising.

DISCIPLINARY HISTORY: *Do you or your financial professionals have any legal or disciplinary history?*

CIM and its financial professionals have not been involved in any disciplinary events. For a free and simple tool to research CIM and its financial professionals, visit www.investor.gov/CRS.

ADDITIONAL INFORMATION

Ronald E. Copley, is your primary contact person. He can be reached via email ron.copley@gmail.com or by phone (910) 431-6308.

Investors who would like additional information about CIM may visit our website at www.copleyinvestmentmanagement.com or can call CIM's office at 910-452-7147. You may also call Ron

Copley directly on his mobile at 910-431-6308 or email him at: Ron.Copley@gmail.com.
You may access more information about CIM by visiting the following Investment Adviser Public Disclosure website: https://adviserinfo.sec.gov/firm/summary/118014.