



EPIC ADVISORY SERVICES CORP

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This Brochure provides information about the qualifications and business practices of Epic Advisory Services Corp. If you have any questions about the contents of this Brochure, please contact us at telephone number (561) 829-2173 and/or by email at tnilsson@epiccapitalfl.com.

The information in this Brochure has not been approved or verified by any state or federal securities authority.

Registration of an investment adviser does not imply any level of skill or training. The oral and written communications received from an adviser provide you with information about which to utilize in determining to hire or retain an investment adviser.

Additional information about Epic Advisory Services Corp. is also available on the SEC's website at www.adviserinfo.sec.gov.

December 2015

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Item 2 – Material Changes

This brochure provides information about the qualifications and business practices of Epic Advisory Services Corp referred to as (“Epic Advisory” or the “Adviser,” or “we,” or “us,” or “our”). The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority. You will receive a summary of any materials changes to this and subsequent Brochures within 120 days of the close of our business’ fiscal year, which is December 31 of each year. We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge. Currently, our Brochure may be requested by contacting us at phone number (561) 829-2173 and/or by email at tnilsson@epiccapitalfl.com.

Additional information about Epic Advisory is also available via the SEC’s web site www.adviserinfo.sec.gov. The SEC’s web site also provides information about any persons affiliated with Epic Advisory who are registered, or are required to be registered, as Investment Adviser Representatives (“IARs”) of Epic Advisory.

Epic Advisory will further provide you with a new Brochure, as necessary, based on changes or new information at any time without charge. Epic Advisory is amending the following sections of its Brochure since its prior distribution to customers:

- **Ownership.** Epic Advisory restructured the ownership of its direct owner, Technology at Work on May 2015. Specifically, Emilia Mortero de Cairoli distributed all her shares of Technology at Work equally to Pablo Cairoli and Graciela Cairoli de Ramirez, both originally listed as indirect owners of the Adviser. As result of the aforementioned restructuring process, Pablo Cairoli and Graciela Cairoli de Ramirez became equal owners of Technology at Work.
- **Advisory Services.** On or about August 31, 2015, Epic Advisory commenced serving as the portfolio manager of the Argentina FlexETP (Series 37) notes due 2035 (the “Notes”) which are issued by IA Capital Structures (Ireland) Plc. The Notes are listed in the Vienna Stock Exchange and are cleared through Euroclear. However, there is no secondary market available and any existing participations have to redeemed or transferred from one investor to another in accordance to the terms set forth in the Series Memorandum. The Note seeks to maximize returns by actively investing at least 80 percent in a diversified portfolio of fixed income and equities issued by Argentine corporations or government entities, with a medium-term horizon and assumming a moderate tolerance for volatility. Epic Advisory engaged its affiliate, Asset Managers S.A. (“Asset Managers”) as a sub-adviser for the Notes. Asset Managers is an investment advisor formed in 2002 regulated by the Central Bank of Uruguay. Epic Advisory and Asset Managers are under common ownership as such this relationship presents a conflict of interest.
- **Fees and Compensation.** Adviser has modified its advisory fee billing structure whereby fees are charged on a quarterly basis in advance. Such provisions are outlined in Epic Advisory’s advisory agreements.

- **Performance Fee-Based Compensation.** Adviser has implemented a performance fee compensation structure for portfolio management services provided to the Notes pursuant terms in the advisory agreement. Asset Managers receives half of the success fee collected by the Adviser.
- **Participation or Interest in Client Transactions and Associated Conflict of Interest.** Adviser, through its affiliated broker-dealer Epic Capital Securities Corp (“Epic Capital”), may engage in agency cross and principal cross transactions.
- **Client Referral and Other Compensation.** Adviser will enter into agreements (“solicitor arrangements”) whereby a party unaffiliated with the Adviser will be entitled to compensation in the event that such party solicits prospective clients who become the Adviser’s clients.
- **Other Financial Industry Activities and Affiliations.** Epic Advisory will commence utilizing Epic Capital as an introducing broker-dealer for certain securities transactions of advisory clients. Epic Advisory is under common ownership with Epic Capital. This common ownership and relationship presents a disclosable conflict of interest. Please note, Epic Capital assesses commissions and/or markups/markdowns on transactions which is in addition to advisory fees assessed separately by Epic Advisory.

Please see the specific sections of the Adviser’s Brochure for further details related to the aforementioned items.

Item 4 – Advisory Services

General

Epic Advisory is a corporation organized in the State of Florida and registered to conduct business as a SEC Registered Investment Adviser.

Description of Advisory Services

Epic Advisory provides asset management, research, and other financial advice to individuals and corporations. Epic Advisory’s investment advisory services are provided through various types of discretionary and non-discretionary accounts (the “Accounts”) in accordance with each client’s investment objectives and pursuant to the terms outlined in its investment advisory agreement. The Adviser’s discretionary and non-discretionary investment management services include the design, structure, and implementation of investment strategies for managed Accounts. Investment activities focus on investments in various kinds of assets and securities in a variety of markets that is intended to fit within the client’s objectives, strategies and risk profile as described by each client. The overall advisory services offered by Epic Advisory fall within the following categories:

➤ *Customized Discretionary Portfolios*

Adviser offers discretionary separately managed Accounts that are customized to each client. Managed Accounts may focus on investments in specified and limited kinds of assets and securities, in limited

markets, or they may be broad-based across many asset classes and markets. Such accounts are intended to fit within the investor's objectives, strategies and risk profile as described by each client. The strategies utilized for these customized accounts may be similar to or may vary widely from the core strategies typically utilized by the Adviser, as further described in Item No. 8 or customized for each client based upon varying factors. Clients may place targets on these accounts and may restrict the types of investments made in such accounts.

General: Investment Policy Statement & Definition; Asset Allocation Strategy; Investment Strategy & Manager Review.

Investments: Review of Current Portfolios & Proposals; Determine Modifications, Create Timeline and Implement; Suggest Reasonable Fees for Products and Services; Provide Consolidated Reporting and Analysis; Ongoing Monitoring and Re-evaluation; Define or Affirm Wealth Transfer Desires; Succession Illustration and Definition.

➤ ***Other Non-Discretionary Advisory Services***

Adviser provides non-discretionary advisory services to all types of clients in accordance with a non-discretionary advisory agreement between Adviser and the client. Each agreement typically defines the services to be provided and if a fee is charged, the fees will also be agreed to in the advisory agreement. Adviser also provides recommendations and research regarding the investment of securities and cash in a client's account. These services are individually tailored to each client's needs and such advice may be provided to accounts with assets maintained at various third parties.

➤ ***Family Office Services***

The Adviser may offer family office investment advisory services. Such services include, but are not limited to furnishing advice to clients on matters not involving securities, such as financial planning matters, retirement planning, real estate planning, trust services that often include estate planning and educational services.

The Adviser's services also include providing personalized confidential financial planning, investment management and financial advisory, as well as family office services to individuals, corporations, trusts and charitable organizations worldwide. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, insurance review, investment management, education funding, retirement planning, estate planning, real estate analysis and educational services.

➤ ***Portfolio Management Services – Publicly Traded Products***

Adviser serves as the portfolio manager to one or more Exchange Traded Products (in the form of a notes) (collectively the "Portfolios") and as such is responsible for investigating, analyzing, structuring and negotiating potential investments, monitoring the performance of investments and advising the Portfolios as to the disposition of investment opportunities. The Adviser currently serves as the portfolio manager to the following listed Note:

- **Argentina FlexETP (Series 37) Notes due 2035** – seeks to maximize returns by actively investing at least 80 percent in a diversified portfolio of fixed income and equities issued by Argentine corporations or government entities, with a medium-term horizon and assuming a moderate tolerance for volatility.

➤ **Other Services**

Adviser may provide additional services for clients from time to time as agreed between the client and the Adviser.

Wrap Fee Programs

Epic Advisory does not currently participate in any Wrap Fee Programs.

Regulatory Assets Under Management

As of November 30, 2015 Epic Advisory maintained approximately \$4,700,000 in assets under management on a discretionary basis and \$ 3,800,000 in assets management on a non-discretionary basis.

Additional General Information

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) may be recommended to clients or engaged directly by the client on an as-needed basis. Conflicts of interest related to recommendations of other professionals will be disclosed to the client in the event they should occur.

Item 5 – Fees and Compensation

Basic fee schedule:

The specific manner in which fees are charged by Adviser is established in each client's written agreement with Adviser. Generally and pursuant to contract, fees for the management of Accounts will be based upon a percentage of the total assets in the account (including margined assets). Adviser typically receives an annual management fee, between .75% to 1.25% of the net asset value of the Account. All fees are negotiable. Adviser may enter into flat fee arrangements from time to time, typically for administrative services provided to clients or client Accounts at a fixed rate of \$250 per hour.

Basic Management Fee Schedule	
Account Value	Fee Percentage
Over \$50,000,000	.75%
\$25,000,000 to \$49,999,999	.85%
\$10,000,000 to \$24,999,999	1.00%
Up to \$9,999,999	1.25%

Fee Schedule for Portfolio Management Services

Epic Advisory charges Exchange Traded Products success fees on a high watermark pursuant the corresponding advisory agreement. Please see Item 6 for further details.

Calculation and Deduction of Advisory Fees

With respect to accounts that Adviser manages on a discretionary basis, including the specialized discretionary programs, clients are generally required to authorize Adviser to directly debit management fees from client accounts on a quarterly basis. Fees for Family Wealth Services and other non-discretionary programs are billed to clients, although frequently clients pre-authorize their custodians to automatically deduct the fees from the client's account and to make payment to Adviser. Management fees are deducted or billed, as applicable, on a quarterly basis in advance. The Adviser may from time-to-time bill fees in advance as negotiated with each individual client.

A client may pay more or less fees than similar clients depending on the particular circumstances of the client, size, additional or differing levels of servicing or as otherwise agreed with specific clients. Clients that negotiate fees, including a flat fee, may end up paying a higher fee than that set forth above as a result of fluctuations in the client's assets under management and account performance.

Since the Adviser bills fees in advance, refunds are given on a prorated basis, based on the number of days remaining in a quarter at the point of termination. Fees that are collected in advance will be refunded based on the prorated amount of work completed up to the day of termination within the quarter terminated. The fee refunded will be the balance of the fees collected in advance minus the daily rate* times the number of days in the quarter up to and including the day of termination. (*The daily rate is calculated by dividing the quarterly AUM fee by the number of days in the termination quarter). Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. Advisory fees are withdrawn directly from the client's accounts with client written authorization.

Compensation for the Sale of Securities

Some of Adviser's supervised or associated persons 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, in their individual capacities as registered representatives of Adviser's affiliated broker-dealer Epic Capital. Supervised or associated persons of Adviser not registered or associated with Epic Capital Securities Corp. do not receive such compensation in connection with accounts managed or advised by Adviser.

Additional Fee Information

Clients may authorize the Adviser to directly debit management fees from client accounts on a quarterly basis. In such instances, management fees are prorated for each capital contribution and withdrawal made during the applicable calendar quarter. Accounts initiated or terminated during a calendar quarter will be charged a prorated fee.

Alternatively, in some instances, clients may receive an invoice for fees, in which it may choose to pay Epic Advisory directly for its billed fees for the relevant period.

Adviser's fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred directly by the client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by fund managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic funds fees, and other fees and taxes on brokerage account and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. It is the Adviser's policy not to accept "kick-backs" or retrocession fees from any third non-affiliated party providing services to the Adviser's clients.

Termination of the Agreement

Although an Agreement between Epic Advisory and its clients are ongoing agreements and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party with a (30) thirty – day advance notice or as agreed upon otherwise between the client and the Adviser.

If an agreement is terminated during a period in which the client has already paid Epic Advisory its advisory fees in advance, then the Adviser will reimburse, on a pro-rated basis, the remaining advisory fees collected for any service not rendered; these fees will be sent to the client's address of record, unless otherwise directed by the client, within (30) days of termination of the agreement.

Item 6 - Performance-Based Fees and side-by-side management

Adviser charges a management fee and in some cases may charge a performance fee. Adviser structures performance fee arrangements subject to Section 205(a)(1) of the Adviser's Act in accordance with the available exemptions thereunder, including the exemption set forth in Rule 205-3. Such performance fees would generally be between 5% to 20%. Performance fees are individually negotiated with each client and may be subject to a High Water Mark. Typically, the fee will be charged on a quarterly basis in arrears. The term "High Water Mark" shall mean that no performance fee will be paid for recoupment of losses. Thus, if the net asset value of the Account (excluding the performance fee) at the end of a calculation period falls below the net asset value at the end of any previous calculation period, no performance fee will be owed to the Adviser for the calculation period then ended. The Adviser will only be entitled to a further performance fee once the net asset value of the Account exceeds the highest net asset value of the Account for all previous calculation periods. The High Water Mark is adjusted for contributions to and withdrawals from the Account. Each client is provided with additional information on the fees payable by their Account, including with respect to the High Water Mark, if any, in their advisory agreement.

Performance based fee arrangements may create an incentive for Adviser to recommend investments which may be riskier or more speculative than those which would be recommended under a different fee arrangement. Performance fee arrangements may also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. Adviser has procedures designed and implemented to ensure that all clients are treated fairly and equally, and to prevent this

conflict from influencing the allocation of investment opportunities among clients. The Adviser may have clients with similar investment objectives. The Adviser is permitted to make an investment decision on behalf of clients that differs from decisions made for, or advice given to, such other accounts and clients even though the investment objectives may be the same or similar, provided that the Adviser acts in good faith and follows a policy of allocating, over a period of time, investment opportunities on a basis intended to be fair and equitable, taking into consideration the investment policies and investment restrictions to which such accounts and clients are subject.

Item 7 - Types of Clients

Epic Advisory provides asset and/or portfolio management services to individuals, high net worth individuals, corporations and institutions or other entities. The minimum dollar value for establishing an Account is generally \$1MM. Initial investments of a lesser amount may be accepted at Adviser's discretion.

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

General Investment Strategies and Methods of Analysis

Adviser has arrangements with third party service providers through which Adviser receives general macroeconomic analyses of economies, currencies, markets and market sectors. Such third parties also provide research reports on specific securities, sample asset allocations and administrative services. Adviser uses such information and services as a tool and Adviser also performs its own research and due diligence on advisers and investment opportunities. Adviser makes investment allocation decisions based on each client's investment objectives and risk tolerance, among other factors. Adviser identifies, structures, monitors, invests and liquidates investments in discretionary accounts. The design and day-to-day management of client portfolios is determined by Adviser through the assigned portfolio manager. Such third party service providers do not have access to or knowledge of information concerning the specific investment decisions and recommendations made to Adviser's clients.

Through Adviser's strategy, Adviser seeks asset preservation and capital appreciation of clients' portfolios by customizing asset allocations and selecting investment vehicles that it believes will align clients' risk / return expectations with long term and short term investment needs and goals. The asset class allocations forecasts and expectations are analyzed and invested in various financial instruments, typically include equity, fixed income, options and alternative investments. Adviser will select and monitor the investment vehicles for each asset class in the portfolios based on their history and prospective risk and return characteristics, and determine suitability for each client's needs, as well as, estimated fees and expense.

Material Risks for Significant Investment Strategies

While it is the intention of Adviser to implement strategies which are designed to minimize potential losses suffered by its client, there can be no assurance that such strategies will be successful. It is possible that a client may lose a substantial proportion or all of its assets in connection with investment decisions made by Adviser. Investment in securities involves a risk of loss that you, as a client, should

be prepared to bear. The following is a discussion of typical risks for Adviser's clients, but it does not purport to be a complete explanation of the risks involved with Adviser's investment strategies.

There is no guarantee that in any time period, particularly in the short term, a client's portfolio will achieve appreciation in terms of capital growth or that a client's investment objective will be met by Adviser.

The value of the securities in which Adviser invests on behalf of its clients may be volatile. Price movements may result from factors affecting individual companies, sectors or industries that may influence certain strategies or the securities market as a whole. Furthermore, a client will be subject to the risk that inflation, economic recession, changes in the general level of interest rates or other market conditions over which Adviser will have no control may adversely affect investment results. Adviser notes that while Adviser's management of accounts may not involve direct leveraging, or other risk factors discussed below, the underlying funds and other investments that comprise client accounts may engage in practices that can materially impact the performance of such fund or investment, which in turn may materially impact the value of Adviser's clients' portfolios.

Hedging transactions may increase risks of capital losses

Adviser utilizes hedging strategies primarily to protect and preserve capital as well as yield enhancement. Investment products in which Adviser invests clients' accounts may utilize a variety of financial instruments, such as options, for risk management purposes. While hedging transactions may seek to reduce risk, such transactions may result in a worse overall performance. Certain risks cannot be hedged, such as credit risk, relating both to particular securities and counterparties. Adviser will not always invest in funds or other investment vehicles that utilize hedging strategies.

Leverage

Adviser may utilize and employ leverage under its current strategies. Such strategies may include the borrowing and short selling of securities, bonds, foreign exchange and the acquisition and disposal of certain types of derivative securities and instruments, such as swaps, futures and options. While leveraging creates an opportunity for greater total returns, it also exposes a client to a greater risk of loss arising from adverse price changes. Where leverage is indirect (e.g., used by a fund manager for a fund in which Adviser's client is invested) a sharp decrease in the value of the investment can have a significant impact on a client's portfolio.

Liquidity of investment portfolio

The market for some securities in which Adviser invests indirectly on behalf of its clients may be relatively illiquid. Liquidity relates to the ability to sell an investment in a timely manner. The market for relatively illiquid securities tends to be more volatile than the market for more liquid securities. Investments in relatively illiquid securities may restrict the ability of a fund or portfolio manager to dispose of investments at a price and time that it wishes to do so. The risk of illiquidity also arises in the case of over-the-counter transactions. There is no regulated market in such contracts and the bid and offer prices will be established solely by dealers in these contracts. Client accounts that are invested in funds or other instruments that contain illiquid investments may be subject to these risks.

Foreign currency markets

Adviser's investment strategies may cause a client to be exposed to fluctuations in currency exchange rates where it invests directly or indirectly in securities denominated in currencies other than U.S. dollars. Adviser does not engage in direct foreign currency trading. However, the underlying funds and other investment vehicles may engage in direct foreign currency trading. The markets in which foreign exchange transactions are effected are highly volatile, highly specialized and highly technical. Significant changes, including changes in liquidity and prices, can occur in such markets within very short periods of time, often within minutes. Foreign exchange trading risks include, but are not limited to, exchange rate risk, interest rate risk and potential interference by foreign governments through regulation of local exchange markets, foreign investment, or particular transactions in foreign currency.

Derivatives

Adviser's investment strategy may cause a client to be exposed to derivatives including instruments and contracts the value of which is linked to one or more underlying securities, financial benchmarks or indices. Derivatives allow an investor to hedge or speculate upon the price movements of a particular security, financial benchmark, index, currency or interest rate at a fraction of the cost of investing in the underlying asset. The value of a derivative depends largely upon price movements in the underlying asset. Therefore, many of the risks applicable to trading the underlying asset are also applicable to derivatives trading. However, there are a number of other risks associated with derivatives trading. For example, because many derivatives provide significantly more market exposure than the money paid or deposited when the transaction is entered into, a relatively small adverse market movement can result not only in the loss of the entire investment, but may also expose a client to the possibility of a loss exceeding the original amount invested.

Settlement risks

Adviser's investment strategies may expose a client to the credit risk of parties with whom Adviser, on behalf of the client or the underlying funds, trades and to the risk of settlement default. Market practices in the emerging markets in relation to the settlement of securities transactions and custody of assets will provide increased risk. Although the emerging markets have grown rapidly over the last few years, the clearing, settlement and registration systems available to affect trades on such markets are significantly less developed than those in more mature world markets which can result in delays and other material difficulties in settling trades and in registering transfers of securities. Problems of settlement in these markets may affect the net asset value and liquidity of a client's portfolio or investments in such portfolios.

Emerging Markets

Adviser's investment strategies include direct and indirect investments in securities in emerging markets and such investments involve special considerations and risks. These include a possibility of nationalization, expropriation or confiscatory taxation, foreign exchange control, political changes, government regulation, social instability or diplomatic developments which could affect adversely the economies of such countries or the value of a client's investments, and the risks of investing in countries with smaller capital markets, such as limited liquidity, price volatility, restrictions on foreign investment

and repatriation of capital, and the risks associated with emerging economies, including high inflation and interest rates and political and social uncertainties. In addition, it may be difficult to obtain and enforce a judgment in a court in an emerging country. The economies of many emerging market countries are still in the early stages of modern development and are subject to abrupt and unexpected change. In many cases, governments retain a high degree of direct control over the economy and may take actions having sudden and widespread effects. Investments in products of emerging market may also become illiquid which may constrain Adviser's ability to realize some or all of a client's portfolio holdings. Accounting standards in emerging market countries may not be as stringent as accounting standards in developed countries.

Investment Concentration

Some client accounts may have a high concentration in one sector, industry, issuer or security that may subject such accounts to greater risk of loss in the event such investments take an economic downturn.

Material Risks for Particular Types of Securities

The Adviser does not invest primarily in a specific security or type of security. The material risks involved with investing are described above.

Item 9 - Disciplinary Information

Investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of an adviser or the integrity of the adviser's management. Adviser has no information applicable to this Item. Please visit www.advisorinfo@sec.gov at any time to view Epic Advisory's registration information and any applicable disciplinary action.

Item 10 - Other Financial Industry Activities and Affiliations

Broker-Dealer Registration

Adviser maintains an affiliate broker-dealer, Epic Capital (CRD No. 166756) registered with the Securities and Exchange Commission (SEC) and Financial Industry Regulatory Authority, Inc. (FINRA). Epic Advisory's management or associated persons are registered and associated with Epic Capital as registered representatives. Epic Advisory's arrangement and relationship with Epic Capital, a registered broker-dealer that is under common control with the Adviser is material. Epic Advisory utilizes Epic Capital as an introducing broker-dealer for certain securities transactions of advisory clients. Epic Capital and/or associated persons receive compensation for brokerage transactions affected in these advisory accounts, and for the purchase of investment products recommended, which poses a conflict of interest. For example, Epic Advisory utilizes Epic Capital as an introducing broker-dealer for certain equity and fixed income trades; this is due to, among other factors, market-competitive commission rates, a trading interface with tools suitable for clients' equity and fixed income trading activities, and quality of execution. Epic Capital has established policies and procedures to mitigate conflicts and address applicable regulatory requirements. However, lower fees for comparable services may be available from other sources. Clients are encouraged to request additional information regarding potential conflicts of interest.

Other – Financial Affiliates

Epic Advisory maintains common ownership with a number of affiliated entities of Capital Markets Argentina. Please see the Adviser's Form ADV Part 1 for further details related to other affiliated entities under common control.

Commodity Pool Operator, Commodity Trading Adviser, Futures Commission Merchant Registration

Adviser and its management persons are not registered or associated with the Commodity Futures Trading Commission ("CFTC") as a futures commission merchant ("FCM"), a commodity pool operator ("CPO") or a commodity trading advisor ("CTA") or an associated person of the foregoing entities.

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

Code of Ethics and Personal Trading Policies

Adviser has adopted the Code of Ethics pursuant to Rule 204A-1 of the Advisers Act in an effort to prevent violations of federal securities laws. Adviser expects all employees to act with honesty, integrity and professionalism and to adhere to federal securities laws.

All officers, directors, Corp and employees of the Adviser and any other person who provides advice on behalf of Adviser and is subject to Adviser's control and supervision (collectively referred to as "Supervised Persons") are required to adhere to the Code.

Prevention of Insider Trading

Adviser has adopted policies designed to prevent insider trading that is more fully described in the Code. Adviser's policy on insider trading applies to securities trading and information handling by all Supervised Persons of Adviser (including spouses, minor children and adult members of their households and any other relative of a Supervised Person on whose behalf Supervised Person is acting) for their own account or the account of any client of Adviser.

Adviser takes its obligation to detect and prevent insider trading with the utmost seriousness. Adviser may impose penalties for breaches of the policies and procedures contained in this manual, even in the absence of any indication of insider trading. Depending on the nature of the breach, penalties may include a letter of censure, profit "give ups," fines, referrals to regulatory and self-regulatory bodies and dismissal.

Personal Securities Transactions

Periodic Reports

As more fully described in the Code, "access persons" are required to submit reports detailing their personal securities holdings to the Chief Compliance Officer on an initial basis, a quarterly basis, and an annual basis.

As an alternative to submitting quarterly transaction reports, Adviser requires persons who are “access persons” to submit brokerage statements or trade confirmations as long as such documents contain the information required under Rule 204A-1(b)(2)(i)(A)-(E) under the Advisers Act.

Initial Public Offerings and Limited Public Offerings

Access Persons must obtain prior written approval from the Chief Compliance Officer before investing in initial public offerings (“IPOs”) or limited offerings (i.e., private placements). In the event the Chief Compliance Officer wishes to purchase IPOs or the securities of a private placement for his/her own employee account, the Chief Compliance Officer must obtain prior written approval from the Adviser’s Board Committee.

Review of Personal Securities Reports

The Chief Compliance Officer (or its designee) is responsible for reviewing the Access Person’s Quarterly Transaction Reports as well as the Initial Holdings Report and the Annual Holdings Report as part of Adviser’s duty to maintain and enforce its Code.

In instances when the Chief Compliance Officer has engaged in personal securities transaction, the Adviser’s Board Committee shall review the Chief Compliance Officer’s brokerage statements and trade confirmations.

Outside Business Activities and Private Investments of Employees

Unless otherwise consented by the Chief Compliance Officer, all employees are required to devote their full time and efforts Adviser’s business. As such, no person may make use of either his or her position as an employee or information acquired during employment, or make personal investments in a manner that may create a conflict, or the appearance of a conflict, between the employee’s personal interests and Adviser’s interests. Accordingly, every employee is required to complete a disclosure form and have the form approved by Adviser’s Chief Compliance Officer prior to serving in any of the capacities or making any of the investments more fully described in the Code.

Reporting Violations

All Supervised Persons (any officer, director, partner and employee of Adviser) are required to report actual or known violations or suspected violations of Adviser’s Code promptly to the Chief Compliance Officer or his designee.

Any report of a violation or suspected violation of the Code will be treated as confidential to the extent permitted by law.

As part of Adviser’s obligations to conduct an annual review of all of its policies and procedures pursuant to Rule 206(4)-7 of the Advisers Act, the Chief Compliance Officer shall review on an annual basis the adequacy of the Code and the effectiveness of its implementation.

Recordkeeping

Adviser maintains the following:

- Copies of the Code;
- Records of violations of the Code and actions taken as a result of the violations;
- Copies of Adviser's supervised persons' written acknowledgement of receipt of the Code;
- Records of Access Persons' personal trading — Initial Holdings Reports, Annual Holdings Reports, and Quarterly Transaction Reports, including any information provided under Rule 204A-1(b)(3)(iii) in lieu of such reports, i.e., brokerage confirmations and transaction reports;
- A record of the names of Adviser's "Access Persons";
- Records of decisions, and the reasons supporting the decision to approve an Access Person's acquisition of securities in initial public offerings or limited offerings; and
- Records of decisions, and the reasons supporting the decision to approve the Chief Compliance Officer's acquisition of securities in initial public offerings or limited offerings.

Acknowledgement of the Code

Each employee will execute a written statement certifying that the employee has (i) received a copy of Adviser's Code; (ii) read and understands the importance of strict adherence to such policies and procedures; and (iii) agreed to comply with the Code.

Training and Education

All Supervised Persons, i.e., all employees, are to receive training on complying with the Code on an annual basis as part of Adviser's annual employee compliance review meeting to ensure that all employees fully understand their duties and obligations and how to comply with the Policy's procedures.

Copies of Adviser's Code

A copy of Adviser's Code is available upon request. For a copy, please contact Adviser at (561) 829-2173.

Participation or Interest in Client Transactions and Associated Conflicts of Interest

Adviser may recommend or invest in securities, including funds, issued or managed by its affiliates (or where the affiliate acts as general partner) in which its affiliates have a material financial interest. Adviser has policies that require personnel who develop advice and recommendations for clients to render only disinterested and impartial advice to clients and to comply with other fiduciary obligations, including having an adequate basis in fact for all recommendations and an obligation to recommend only investments that are suitable for the particular client.

The potential conflicts of interest involved in any such transactions are generally governed by Adviser's Code. Pursuant to the stipulations of the Code, Adviser or a related person may buy or sell for itself securities that it also recommends to clients. The potential conflicts of interest involved in such

transactions are governed by the Code, which establishes sanctions if its requirements are violated and requires that Adviser and employees place the interests of Adviser's clients above their own.

When Epic Capital is acting as a broker with respect to a fixed income transaction executed for a client of Adviser, it will generally act on a riskless principal basis rather than on an agency basis. A riskless principal transaction refers to a transaction where Epic Capital, after receiving an order to buy (or sell) a security for a client, purchases (or sells) the security for its own account to offset a contemporaneous sale to (or purchase from) the client. In such instances, the Adviser is required to disclose to its advisory clients in writing before the completion of such transaction the capacity in which it was acting and to obtain written consent of advisory clients for such transactions. Epic Capital may charge a mark-up or mark-down in certain riskless principal transactions. Equity transactions are generally executed on an agency basis, but may be executed on a riskless principal basis using the same procedures and equivalent pricing as for fixed income securities.

From time to time, Epic Capital may engage in agency cross transactions for Adviser's clients. An agency cross transaction occurs when Epic acts as broker for both Adviser's advisory clients and for other customers of Epic Capital on the other side of the transaction. Agency cross transactions will be executed only after obtaining prospective written consent from the advisory client, which consent can be terminated at any time with written notice to Adviser. Adviser does not advise both the seller and purchaser with regard to an agency-cross transaction. Epic Capital may also engage from time to time in so-called "cross transactions" in which it affects trades between Adviser's advisory client accounts. Epic Capital will only effect such transactions to the extent that it is able to achieve "best execution" for each client. The price will be set generally at the mid-point between the bid and ask price (or last sale price in the case of exchange listed securities) and Epic Capital will not charge commissions or other compensation in connection with the transaction.

Investments in Securities by Adviser and its Personnel

Adviser's personnel or a related person of Adviser may invest in the same or similar securities and investments as those recommended to or entered into on behalf of Adviser's clients. The results of the investment activities of Adviser's personnel or related persons for their accounts may differ from the results achieved by or for client accounts managed by Adviser. The conflicts raised by these circumstances are discussed below.

Adviser may recommend or effect the purchase or sale of securities in which its related persons or an affiliate, directly or indirectly, has a position or interest, or of which related or affiliated person buys or sells for itself. Such transactions may also include trading in securities in a manner inconsistent with the advice given to Adviser's clients.

Activities and transactions for client accounts may be impaired or effected at prices or terms that may be less favorable than would otherwise have been the case had Adviser or related persons not pursued a particular course of action with respect to the issuer of the securities. In addition, in certain instances Adviser's personnel may obtain information about the issuer that could limit the ability of such personnel to buy or sell securities of the issuer on behalf of client accounts.

Transactions undertaken by Adviser's clients may also adversely impact one or more client accounts. Other clients of the Adviser may have, as a result of receiving client reports or otherwise, access to information regarding Adviser's transactions or views that may affect their transactions outside of accounts controlled by Adviser, and such transactions may negatively impact other clients' accounts. A client's account may also be adversely affected by cash flows and market movements arising from purchase and sale transactions by, as well as increases of capital in and withdrawals of capital from, other clients' accounts. These effects can be more pronounced in less liquid markets.

The results of the investment activities of a client's account may differ significantly from the results achieved by Advisers related persons and from the results achieved by Adviser for other client accounts.

As more fully described above, Adviser has adopted a Code of Ethics. Such Code of Ethics together with Advisers policies and procedures restrict the ability of certain officers and employees of Adviser from engaging in securities transactions in any securities that its clients have purchased, sold or considered for purchase or sale, for an appropriate "black out" period. Other restrictions and reporting requirements are included in Advisers procedures and Code of Ethics minimize or eliminate conflicts of interest.

Trading Alongside by Adviser and its Personnel

Client accounts managed by Adviser may trade in the same or similar securities at or about the same time as accounts managed or advised by affiliates of the Adviser. Investments by Adviser's affiliates and their clients may have the effect of diluting or otherwise disadvantaging the values, prices or investment strategies of a client's account, particularly in small capitalization, emerging market or less liquid strategies. This may occur when portfolio decisions regarding a client's account are based on research or other information that is also used to support portfolio decisions for Adviser's affiliates. If a portfolio decision or strategy for Adviser's affiliates' accounts or the accounts of clients of affiliates is implemented ahead of, or contemporaneously with, similar portfolio decisions or strategies for Adviser's client's account, market impact, liquidity constraints, or other factors could result in the account receiving less favorable trading results and the costs of implementing such portfolio decisions or strategies could be increased.

Errors

Errors may occur from time to time in transactions for client accounts. The Adviser will typically correct any such errors that are the fault of the Adviser or an affiliate at no cost to the client, other than costs that the Adviser deems immaterial. To the extent that the subsequent sale of such securities generates a profit to the Adviser, the Adviser may retain such profits, and may, but is not required to, use such profits to offset errors in the future or pay other client-related expenses. The Adviser will not be responsible for any errors that occur that are not the fault of the Adviser or any affiliate.

Privacy Policy

Adviser considers your privacy our utmost concern. Adviser does not share any information of clients with nonaffiliated third parties, except such information may be disclosed as necessary to process a transaction an investor has requested, to the extent the investor specifically authorized the disclosure, to service providers or joint marketers who agree to limit their use of such information, and to the extent

required or specifically permitted by law or reasonably necessary to prevent fraud, unauthorized transactions or liability.

When Adviser discloses non-public personal information of clients to a non-affiliated third party that provides services to Adviser or engages in joint marketing, Adviser shall:

- notify investors of the possibility of such disclosure; and
- enter into a contractual agreement with the third party that prohibits the third party from disclosing or using the investors' information other than to carry out the purposes for which the information was disclosed to the third party.

In particular, Adviser may enter, in compliance with the above conditions, into an agreement with a non-affiliated third party to store the records of Adviser clients and investors including electronic and e-mail records.

For more information about Adviser's privacy policies or to request a brochure describing Adviser's privacy policies contact Adviser at (561) 829-2173.

Item 12 - Brokerage Practices

Epic Advisory has discretionary authority, subject to the terms and conditions set forth in the client agreement, to determine (1) securities to be bought and sold, (2) amount of securities to be bought and sold, (3) the broker or dealer to be used, and (4) commission rates paid. Epic Advisory's discretionary authority is limited by any reasonable restrictions that the client places on the management of the account.

In recommending brokers-dealers and custodians, Epic Advisory will generally seek the best combination of services provided and associated expenses. Relevant factors used in evaluating "execution quality" include historical net prices, the execution, clearance, and settlement and error correction capabilities of the broker or dealer generally and in connection with securities of the type and in the amounts to be bought or sold; the broker's or dealer's willingness to commit capital; reliability and financial stability; the size of the transaction; availability of securities to borrow for short sales; and the market for the security.

In addition to a broker-dealer's ability to provide "execution quality," Epic Advisory's selection criteria may include the value of various services or products provided by the broker-dealer. For example, Epic Advisory may acquire: research reports on or other information about particular companies, sectors or industries; economic surveys and analyses; recommendations as to specific securities; electronic market quotations; non-mass-marketed financial publications; portfolio evaluation services; performance measurement services; market, economic and financial studies and forecasts; data on pricing and availability of securities; certain financial database software and services; and other products or services that may enhance its investment decision making.

Epic Advisory utilizes Epic Capital as an introducing broker-dealer for certain securities transactions of advisory clients. Epic Capital and/or associated persons receive compensation for brokerage transactions affected in these advisory accounts, and for the purchase of investment and insurance

products recommended, which poses a potential conflict of interest. Clients may pay commissions higher than those obtainable from other brokers for the same services rendered by Epic Capital or any other broker-dealer recommended to the client by Epic Advisory. Clients can also elect to have their account held custody and trades executed at a broker-dealer of their choice, which may or may not cost more to the client. Epic Advisory and Epic Capital maintain dually associated persons and share facilities as such they are commonly and collectively referred to as “Epic”. Please advisory services are offered through Epic Advisory and securities products are offered through Epic Capital.

Epic Advisory may aggregate sale and purchase orders of securities held by a client with similar orders being made simultaneously for other client accounts or entities if, in the reasonable judgment of Epic Advisory, such aggregation is reasonably likely to result in an overall economic benefit to clients based on an evaluation that the clients will benefit from relatively better purchase or sale prices, lower commission expenses or beneficial timing of transactions, or a combination of these and other factors. In general, the average price of all securities purchased or sold in such transactions will be determined, and a client will be charged or credited, as the case may be, the average transaction price. Although, in any given case, this practice could have a detrimental or beneficial effect upon the price or value of the security for any client account, Epic Advisory believes that on an overall basis such practice is beneficial to clients. While Epic Advisory believes this is beneficial and fair on an overall basis with respect to all Epic Advisory accounts, there can be no assurance that on a trade-by-trade or overall basis that any particular client will not be treated more or less favorably than another client.

It is the Adviser’s policy not to enter into soft dollar arrangements and the Adviser has no formal soft dollar arrangements. The Adviser does not consider, in selecting or recommending broker-dealers, whether it or a related person receives Client referrals from such broker-dealer.

Brokerage for Client Referrals

Adviser does not direct brokerage to particular brokers in consideration for client referrals.

Item 13 - Review of Accounts

Accounts are typically reviewed by the Chief Compliance Officer on a periodic basis or as needed due to market conditions or transactional activity. The Chief Compliance Officer typically reviews daily transactions entered into for investment advisory clients to determine that correct entries have been made for all client records.

Factors Triggering a Review

There are no specific triggering factors leading to a review.

Client Reports

Clients of the Adviser with discretionary accounts receive quarterly reports from their qualified Custodian. The Adviser will provide a performance report quarterly or as agreed between the Adviser and the client.

Item 14 - Client Referrals and Other Compensation

Epic Advisory, from time to time, receives client referrals, and such referrals often come from current clients, attorneys, accountants, employees, personal friends of employees and other similar sources. Furthermore, Epic Advisory does not currently accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

The Adviser has entered into agreements whereby a party unaffiliated with the Adviser is entitled to compensation in the event that such party solicits prospective clients who become the Adviser's clients. Such solicitor entered into written agreements with the Adviser pursuant to which the solicitor will provide each prospective client with a copy of the Adviser's Form ADV Part 2 and a disclosure document setting forth the terms of the solicitation agreement, including the nature of the relationship between the solicitor and the Adviser and any fees to be paid to the solicitor. Where applicable, cash payments for client solicitations will be structured to comply fully with the requirements of Rule 206(4)-3 under the Advisers Act.

Item 15 - Custody

All assets are typically held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Therefore, aside from debiting fees from its clients' accounts to pay for services rendered, Epic Advisory does not maintain custody of its clients' funds. Clients receive monthly or quarterly statements from the broker-dealer, bank or other qualified custodian that holds and maintains the client's investment assets.

Item 16 - Investment Discretion

Adviser receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account.

When selecting securities and determining amounts, Adviser observes the investment policies, limitations and restrictions of the clients for which it advises. Investment guidelines and restrictions must be provided to Adviser in writing.

Item 17 - Voting Client Securities

Epic Advisory does not vote proxies on securities, thus, clients are expected to vote their own proxies. Clients may request a copy of proxy voting records via contact to the Adviser's respective custodian.

Item 18 – Financial Information

The Adviser has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients. Also, the Adviser has not been the subject of a bankruptcy proceeding.

Item 19 - Requirements for State-Registered Advisers

Educational and Background Experience

Epic Advisory maintains registered investment adviser representatives in addition to its Chief Executive Officer and Chief Compliance Officer. Their education and business background can be found on the Supplemental ADV Part 2B form.

Other Business Activities

A description of other business activities related to the Adviser's management and executive officers can be found on the Supplemental ADV Part 2B form.

Material Disciplinary Disclosures

No management person at Epic Advisory 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

Neither Epic Advisory, nor its management persons, has any relationship or arrangement with issuers of securities.

Item 20 – Business Continuity and Information Security

Business Continuity Plan

Epic Advisory has a Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, services or key persons. The Business Continuity Plan covers natural disasters such as snow storms, hurricanes, tornados, and flooding. The Plan covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, T-1 communications line outage, Internet outage, railway accident and aircraft accident. Electronic files are backed up daily and archived offsite.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. It is our intention to contact all clients promptly after a disaster that dictates moving our office to an alternate location.

Privacy and Information Security

Epic Advisory maintains an information security program to reduce the risk that your personal and confidential information may be breached. Furthermore, Epic Advisory is committed to maintaining the confidentiality, integrity and security of the personal information that is entrusted to us.

The categories of nonpublic information that we collect from you may include information about your personal finances, information about your health to the extent that it is needed for the financial planning

process, information about transactions between you and third parties, and information from consumer reporting agencies, e.g., credit reports. We use this information to help you meet your personal financial goals.

We maintain a secure office to ensure that your information is not placed at unreasonable risk. We employ a firewall barrier and use other techniques and authentication procedures in our computer environment. We do not provide your personal information to mailing list vendors or solicitors. We require strict confidentiality in our agreements with unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors. Federal and state securities regulators may review our Company records and your personal records as permitted by law. Personally identifiable information about you will be maintained while you are a client, and for the required period thereafter that records are required to be maintained by federal and state securities laws. After that time, information may be destroyed.

We will notify you in advance if our privacy policy is expected to change. We are required by law to deliver this Privacy Notice to you annually, in writing.

Item 1 – Cover Page

Part 2B (Brochure Supplement Information)

December 2015

This brochure supplement provides information about the supervised persons listed below that supplements the Epic Advisory Services Corp brochure. You should have received a copy of that brochure. Please contact Thomas Nilsson, Chief Compliance Officer, if you did not receive Epic Advisory Services Corp's brochure or if you have any questions about the contents of this supplement.

List of Supervised Persons

Pablo Cairoli - Chief Executive Officer
Thomas Nilsson - Chief Compliance Officer

Epic Advisory Services Corp
2000 Glades Road, Suite 210
Boca Raton, FL 33431
Telephone: (561) 829-2173
Facsimile: (561) 829-2174

E-mail: tnilsson@epiccapitalfl.com

Additional information about the above supervised persons is available on the SEC's website at www.adviserinfo.sec.gov.

Pablo Cairoli - Chief Executive Officer

Item 2 - Educational Background and Business Experience

Mr. Cairoli was born in 1955. Mr. Cairoli is responsible for all activities of the Adviser. Mr. Cairoli maintains over 24 years of industry related experience in the Financial Services Industry. Prior to forming Epic Advisory, Mr. Cairoli served as Chief Executive Officer and President for Capital Markets Argentina for over 20 years primarily responsible for establishing corporate sales and trading initiatives, as well as general oversight of sales and related trading activities. In addition to his tenure with Capital Markets Argentina, Mr. Cairoli served as Board Member Director for Garantia de Valores SGR (“GV”). As Board Member of GV, Mr. Cairoli was responsible, among other duties, for approving commercial strategies of GV as well as monitoring the liquid investments of GV. During the time period of 2000 to 2006, Mr. Cairoli was chosen to serve as Treasurer and Board Member for Bolsa de Comercio de Buenos Aires (“Bolsa”). During his board member tenure with Bolsa, Mr. Cairoli was in charge, among other duties, of investing the liquid funds of Bolsa and participating in the launch of new products such as the GAS Market and the Post Dated Check Market. Mr. Cairoli also previously served as Executive Board Member for Banco Crédito Argentino (“BCA”) during the time period of 1986 to 1991. BCA was the third largest private bank in Argentina in which Mr. Cairoli was responsible for developing relationships with correspondent banks.

Mr. Cairoli received a Masters in International Business Studies from the University of South Carolina, as well as a Masters of Business Administration degree from the Universidad Católica Argentina, Buenos Aires, Argentina. In addition to his studies, Mr. Cairoli also completed the Owner/President Management Program offered by the Harvard Business School and holds the Certified Public Accountant (CPA) credential. Mr. Cairoli is qualified under the Series 7 and 24 licenses and is also fluent in English and Spanish.

Item 3 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 - Other Business Activities

Mr. Cairoli is involved in the following activities:

- CEO and President of Epic Capital, an affiliate broker-dealer.
- President of Capital Markets Argentina Sociedad de Bolsa S.A.

Item 5 - Additional Compensation

Mr. Cairoli is compensated for his role as CEO and President of Epic Advisory and Epic Capital. Mr. Cairoli also receives compensation through his ownership interests in Epic Advisory, Epic Capital and

other affiliated entities under common control and ownership. Please see Adviser's Form ADV Part 1 for further details related to other entities under common control.

Item 6 - Supervision

Individual(s) responsible for supervising the activities of Mr. Cairolì is the Adviser's Board Committee, as well as the Adviser's CCO.

Item 7 – Requirements for State-Registered Advisers

Mr. Cairolì has not been involved in any disclosable events, as such no additional information is required pursuant to this item at this time.

Thomas Nilsson - Chief Compliance Officer

Item 2 - Educational Background and Business Experience

Mr. Nilsson was born in 1981. Mr. Nilsson is the Adviser's Chief Compliance Officer responsible for managing the day to day affairs of the Adviser as well as developing and implementing overall policies of the Adviser. Mr. Nilsson maintains over 9 years of industry related experience in the Financial Services Industry. Mr. Nilsson began his career with Capital Markets Argentina S.A. (the "Firm") as a Financial and Product Analyst. Mr. Nilsson was primarily responsible for investment and risk analysis of products sold, constructing portfolios and tracking overall performance of investments. Mr. Nilsson was also involved in the Firm's private banking group responsible for conducting analysis and regulatory oversight of private bankers engaging in the sale of various products such as mutual funds, hedge funds and structured products. Mr. Nilsson also previously served as Research Analyst with the Firm covering the local Argentine market focused on companies in the Merval Index.

Prior to joining Epic Advisory, Mr. Nilsson served as International Operations/Compliance Manager for the Firm primarily responsible for platform administration, relationship management and compliance/operational oversight of Firm registered representatives and clearing agent. Mr. Nilsson's oversight activities also included conducting and coordinating reviews of various sales and trading processes in accordance to local regulatory guidelines.

Mr. Nilsson completed his undergraduate studies in Economics from the Universidad Torcuato Di Tella. Mr Nilsson also maintains a Master's degree in Finance from the Universidad Torcuato Di Tella as well. Mr. Nilsson is fluent in English and Spanish, as well as proficient in Swedish. Mr. Nilsson is qualified under the Series 4, 7 and 24 licenses.

Item 3 - Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice. No information is applicable to this Item.

Item 4 - Other Business Activities

Mr. Nilsson serves as CCO of Epic Advisory as well as its affiliate broker-dealer, Epic. Mr. Nilsson does not maintain any additional outside business activities at this time.

Item 5 - Additional Compensation

Mr. Nilsson is compensated for his role as CCO of Epic Advisory and Epic Capital. Mr. Nilsson does not receive any additional form of compensation.

Item 6 - Supervision

Individual(s) responsible for supervising the activities of Mr. Nilsson is the Adviser's CEO.

Item 7 – Requirements for State-Registered Advisers

Mr. Nilsson has not been involved in any disclosable events, as such no additional information is required pursuant to this item at this time.