

Epic Funds LLC

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This brochure provides information about the qualifications and business practices of Epic Funds LLC. If you have any question about the contents of this brochure, please contact us at (509) 591-0014. 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.

Epic Funds LLC is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Epic Funds LLC is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. Epic Funds LLC CRD number is 294571.

Item 2 - Material Changes

We do not have any material changes to report because this is our initial Brochure. In the future, this Item will discuss only specific material changes that are made to the Brochure and provide clients with a summary of these changes. We will also reference the date of our last annual update to this Brochure.

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Item 4 – Advisory Business

OWNERSHIP/ADVISORY HISTORY

Epic Funds LLC (“We”) was founded in March 2018 by Jeffery P. Lewis. We are a Washington limited liability company.

SERVICES OFFERED

We offer an automated investment platform for individuals looking to invest any amount of money based on his or her risk appetite and/or age, as well as his or her existing savings, investments, monthly income, and fixed monthly debts. A new client will complete an online questionnaire that covers the following questions:

1. How much average growth per year do you expect your portfolio to produce over the next 10 years?
2. What are your primary investment concerns at this point in your life?
3. What is your level of investment knowledge?
4. When do you expect to withdraw from your investments?
5. What type of investor are you?
6. How much volatility are you comfort with?
7. How much investment loss makes you uncomfortable or anxious?

With this information our algorithm will determine if one of our proprietary portfolios is in the client’s best interest.

The client also receive Money Monitor™ as part of his or her portfolio. Money Monitor™ is tracking software used to monitor the performance of a client’s account. Money Monitor™ signals the client based on predetermined account values, when it is time to buy or sell holdings in the client’s account. Money Monitor™ does not make the trade for the client, it merely provides the recommendation on when to buy or sell. It is up to the client to place the actual trade.

WRAP PROGRAM

We do not sponsor a wrap program. This section is not applicable.

CLIENT ASSETS MANAGED

Because we are a newly formed firm, we do not yet manage any client assets.

Item 5 – Fees and Compensation

FEE AND FEE BILLING

We charge a management fee based on a percentage of assets under management in the client’s account.

Custodian Reported Value	Annual Management Fee
\$0 to \$249,999	1.25%
\$250,000 to \$499,999	1.25%
\$500,000 to \$999,999	1.00%
Above \$1,000,000	0.85%

The management fee is calculated and collected monthly, in arrears, meaning that we collect the management fee *at the end of* the one-month billing period. The management fee will be based on the custodian report account value as of the last business day of the month. The management fee is negotiable. Cash balances and investments in money market funds are counted toward the account value and are included in the management fee calculations. The client will be asked to authorize us with the ability to instruct the custodian to deduct our management fee directly from the account. The client may terminate this authorization at any time.

Each account is also charged \$5 per month for Money Monitor™. This fee is collected at the same time as the above fee.

OTHER FEES

Our fee does not include the costs of maintaining the account. Our management fee is separate and distinct from other fees or expenses including, but not limited to, custodian fees such as ticket charges, distribution fees, short term redemption fees and other related costs and expenses. Mutual funds and exchange-traded funds also charge internal management fees, as disclosed in a fund's prospectus, which are separate and distinct from our management fee.

TERMINATION OF SERVICES

The client may terminate any service for any reason without penalty within five (5) business days after entering an agreement. After five (5) business days, the client may cancel at any time.

Item 6 – Performance-Based Fees and Side by Side Management

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client) or provide side by side management.

Item 7 – Types of Clients

We offer our services to individuals and high net worth individuals. We do not require a minimum account size.

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

METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

We use asset allocation as our investment strategy. Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to an individual's goals, risk tolerance and investment horizon. The asset classes typically include

equities, fixed-income, international, and cash and equivalents. The risk associated with asset allocation is that each class has different levels of risk and return, so each will behave differently over time. There is no guarantee that diversification among asset classes will grow a portfolio.

We purchase securities with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. The risk associated with using a long-term purchase strategy is that it generally assumes the financial markets will go up in the long-term, which may not be the case. There is also the risk that the segment of the market that the client is invested in or perhaps just that client's investment will go down over time even if the overall financial markets advance. Purchasing investments long-term may create an opportunity cost - "locking-up" assets that may be better utilized in the short-term in other investments.

INVESTMENT RISKS

All investments bear different types and degrees of risk and **investing in securities involves risk of loss that clients should be prepared to bear.** While we use investment strategies that are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. Clients should feel free to ask questions about risks they do not understand, we would be pleased to discuss them.

RECOMMENDED SECURITIES

Several types of securities are used in client portfolios including, but not limited to, mutual funds, exchange traded funds (ETFs), stocks, and bonds. Some of the risk associated with these securities include:

- **Credit Risk:** This is the risk that an issuer of a bond could suffer an adverse change in financial condition that results in a payment default, security downgrade, or inability to meet a financial obligation.
- **Inflation Risk:** This is the risk that inflation will undermine the performance of an investment and/or the future purchasing power of a client's assets.
- **Interest Rate Risk:** The chance that bond prices overall will decline because of rising interest rates.
- **International Investing Risk:** Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, as well as regulatory and financial reporting standards, that differ from those of the U.S.
- **Manager Risk:** The chance that the proportions allocated to the various securities will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.

- **Stock Market Risk:** The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events within the past 10-years that would be material to a client's evaluation of the adviser or the integrity of its management. We have no information applicable to this Item because we have never been the subject of any administrative, civil, criminal, regulatory (SEC or State) or self-regulatory proceedings.

Item 10 – Other Financial Industry Activities and Affiliations

Our associates may be independent insurance agents and may recommend this service to our clients. This other business activity pays them commissions that are separate from the fees described above. This is a conflict of interest because the commissions give our associates a financial incentive to recommend and sell clients the insurance products. However, they attempt to mitigate any conflicts of interest to the best of their ability by always acting in the client's best interests, including the sale of commissionable products to advisory clients. The client is also informed that he or she always have the right to choose whether to act on the recommendation and he or she have the right to purchase recommended insurance through any licensed insurance agent.

We are affiliated with Epic Trust Advisors, LLC, a registered investment adviser, through common ownership. Epic Trust Advisors, LLC may use Money Monitor™ with its clients. The fees Epic Trust Advisors, LLC charges clients are separate from the subscription fees outlined above. These additional fees create a financial incentive to recommend this service to our clients. However, we and Epic Trust Advisors, LLC attempt to mitigate any conflicts of interest to the best of our ability by always acting in the client's best interests through our fiduciary duties. The client is also informed that he or she always have the right to choose whether to act on any recommendation and he or she have the right to purchase recommended services through any investment adviser.

Item 11 – Code of Ethics, Participation or Interest in Client Transaction and Personal Trading

DESCRIPTION

Our Code of Ethics establishes ideals for ethical conduct based upon fundamental principles of openness, integrity, honesty, and trust. We will provide a copy of our Code of Ethics to any client or prospective client upon request.

Our Code of Ethics covers all supervised persons and it describes our high standard of business conduct and fiduciary duty to our clients. The Code of Ethics includes, among other things, provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading

procedures. All supervised persons must acknowledge the terms of the Code of Ethics annually or as amended.

MATERIAL INTEREST IN SECURITIES

We do not have a material interest in any securities.

INVESTING IN OR RECOMMENDING THE SAME SECURITIES

Our owner may buy or sell for his own accounts the same securities at or about the same time that they recommend those securities to clients or purchase them for client accounts. A conflict of interest may exist because they can trade ahead of client accounts. We mitigate any conflicts of interest in two ways. First, our Code of Ethics requires employees to report personal securities transactions on at least a quarterly basis and provide us with a detailed summary of certain holdings (both initially upon commencement of employment and quarterly thereafter) in which employees have a direct or indirect beneficial interest. The reports are reviewed to ensure we do not trade ahead of client accounts. Second, we require client transactions be placed ahead of our associates' personal trades or our associates can place personal trades as part of a block trade (Please see Item 12.B for details on our block trading practices). The records of all associates' personal and client trading activities are reviewed and made available to regulators to review on the premises.

Item 12 – Brokerage Practices

RECOMMENDATION CRITERIA

When we recommend a custodian, we seek a broker-dealer who offer competitive commission costs together with reliable services. To this end we participate in the institutional advisor program (the "Program") offered by TD Ameritrade Institutional. TD Ameritrade Institutional is a division of TD Ameritrade Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker-dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through its participation in the Program, which are outlined in Item 14 below.

NOTE: Clients may be able to obtain lower commissions and fees from other brokers, and the value of products, research and services given to the applicant is not a factor in determining the selection of broker/dealers or the reasonableness of their commissions.

RESEARCH AND SOFT DOLLARS

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services. We do not receive soft dollars.

DIRECTED BROKERAGE

Some clients may direct us to a specific broker-dealer to execute securities transactions for their accounts. When so directed, we may not be able to effectively negotiate lower brokerage

commissions or achieve best execution on those clients' transactions. This can result in substantially higher fees, charges or dealer concessions in one or more transactions for the clients' accounts because we cannot negotiate favorable prices.

TRADE AGGREGATION

We may aggregate transactions in equity and fixed income securities for a client with other clients to improve the quality of execution. When transactions are so aggregated, the actual prices applicable to the aggregated transactions will be averaged, and each client account will be deemed to have purchased or sold its proportionate share of the securities involved at the average price obtained. We may determine not to aggregate transactions, for example, based on the size of the trades, the number of client's accounts, the timing of the trades, the liquidity of the securities or the discretionary or non-discretionary nature of the trades. If we do not aggregate orders, some clients purchasing securities around the same time may receive a less favorable price than other clients. This means that this practice of not aggregating may cost clients more money.

Item 13 – Review of Accounts

PERIODIC REVIEWS

Our algorithm continuously monitors a client's account. It sends alerts to our traders when preprogrammed prompts are triggered.

REPORTS

The client has 24-7 access to our online dashboard that shows his or her account balance and alert triggers.

Item 14 – Client Referrals and Other Compensation

OTHER COMPENSATION

We do not pay nor receive compensation for referrals. However, we participate in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade 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 our 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 us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by our related persons. Some of the products and services made available by TD Ameritrade through

the program may benefit us but may not benefit its client accounts. These products or services may assist us in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise. The benefits received by us or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, our endeavors at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by us or our related persons in and of itself creates a potential conflict of interest and may indirectly influence our choice of TD Ameritrade for custody and brokerage services.

CLIENT REFERRALS

We do not pay for client referrals or use solicitors.

Item 15 – Custody

All client funds, securities and accounts are held at third-party custodians. We do not take possession of a client's funds, securities or accounts. The custodians will also send at least monthly account statements. We urge clients to carefully review their account statements and notify us of any discrepancies as soon as possible.

Item 16 – Investment Discretion

We offer discretionary investment management services. To grant us discretionary power over an account, the client must sign the investment management agreement. Our investment management agreement contains a limited power of attorney that allows us to select the security, the amount, and the time of the purchase or sale in the client's account. It also allows us to place each such trade without the client's prior approval. In addition to our investment management agreement, the client's custodian may request the client to sign the custodian's limited power of attorney. This varies with each custodian. We discuss all limited powers of attorneys with the client prior to their execution. In all cases, however, such discretion is to be exercised in a manner consistent with the state investment objectives for the client account and any other investment policies, limitations, or restrictions.

Item 17 – Voting Client Securities

We do not vote proxy votes for any client. Proxy information is sent directly to the client from the account's custodian. Any proxy materials received by us will be forwarded to clients for response and voting. Clients should feel free to contact us with any questions about proxy materials.

Item 18 – Financial Information

BALANCE SHEET

We do not require or solicit prepayment of more than \$1200 in fees per client, six months or more in advance. Therefore, we are not required to provide a balance sheet.

FINANCIAL CONDITION

We are required in this Item to provide you with certain financial information or disclosures about our financial condition if we have a financial commitment that impairs our ability to service you. We do not have a financial commitment that impairs our ability to service our clients.

BANKRUPTCY

We have not been the subject of a bankruptcy proceeding.