

Epic Capital Wealth Advisors, LLC

Firm Brochure (Part 2A of Form ADV)

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This Brochure provides information about the qualifications and business practices of Epic Capital Wealth Advisors, LLC. If you have any questions about the contents of this Brochure, or would like a free copy, please contact us at 435-657-2436. 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 Capital Wealth Advisors, LLC is an SEC registered investment adviser under Rule 203A-2(c). Registration as an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Epic Capital Wealth Advisors, LLC (CRD #323482) is available on the SEC's website at www.adviserinfo.sec.gov.

September 23, 2024

Item 2: Material Changes

Initial Filing

This is an initial filing in accordance with the filing requirements for registered investment advisors. SEC Registration as via Rule 203A-2(c).

Full Brochure Available

The complete copy of our Firm Brochure is available by contacting Epic Capital Wealth Advisors, LLC at 435-657-2436

Item 3: Table of Contents

Item 1 – Cover Page	
Item 2 – Material Changes	ii
Item 3– Table of Contents.....	iii
Item 4– Advisory Business	1
Item 5 – Fees and Compensation	7
Item 6: Performance-Based Fees.....	11
Item 7: Types of Clients.....	11
Item 8: Methods of Analysis, Investment Strategies and Risk of Loss.....	11
Item 9: Disciplinary Information.....	13
Item 10: Other Financial Industry Activities and Affiliations.....	14
Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	15
Item 12: Brokerage Practices	16
Item 13: Review of Accounts.....	17
Item 14: Client Referrals and Other Compensation	18
Item 15: Custody.....	18
Item 16: Investment Discretion	18
Item 17: Voting Client Securities	19
Item 18: Financial Information	19
Item 19: Requirements for State Registered Advisors	19
Brochure Supplement (Part 2B of Form ADV)	21

Item 4: Advisory Business

Firm Description

Epic Capital Wealth Advisors, LLC, (hereinafter “Epic Capital, LLC”, “Advisor”, “Adviser” or “Firm”) is a limited liability company under the laws of the State of Utah, was founded in 09/08/2022. David Anthony is the 100% owner.

Epic Capital, LLC provides comprehensive and integrated retirement income planning, financial planning and investment management services to affluent, high net worth individuals, trusts, estates, corporations, and charitable organizations. Advice is provided through consultation with the Client and may include: determination of financial objectives, identification of financial problems, and the solving of those problems via:

Investment Management	Retirement Income Planning	Tax Planning
Insurance Planning	Distribution Planning	Income Creation
Social Security Planning	Estate Planning	Charitable Giving
Roth Conversion Planning	Home Equity Planning	Pension Planning
Stock Option Planning	Fixed Income Planning	Asset/Liability Planning

Epic Capital, LLC, is a fee-based financial planning firm. The firm does not sell fixed index annuities and other insurance products for a commission. The firm’s managing member owns several affiliated businesses that bring value and provide solutions to the client’s financial problems and are part of the comprehensive planning process the firm provides, including:

Affiliated Business	Description	Compensation
Insurance agent	Insurance agency	Commission
Optimal Tax, LLC	Tax planning firm	Fees

Epic Capital, LLC does not act as custodian for any client accounts, custody is to be offered by Goldman Sachs, Interactive Brokers, and Schwab.

An evaluation of each Client's current situation is provided to the Client via the Epic Capital Retirement Income Road Map, or the Epic Capital 2nd Opinion Service, often in the form of a net worth statement, risk analysis or Comprehensive Supercharged Roth IRA Conversion Analysis. Periodic reviews are also communicated to provide reminders of the specific courses of action that need to be taken.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the Client on an as-needed basis.

Types of Advisory Services

ASSET MANAGEMENT

Epic Capital, LLC offers discretionary and non-discretionary direct asset management services to advisory Clients for their investment portfolios. The Firm offers Clients ongoing investment and portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring, and the overall investment program will be based on the above factors.

Epic Capital, LLC offers proprietary portfolios and shared portfolios. These portfolios are risk managed and are designed to profit in bull markets and protect profits in bear markets. The portfolios are based on FBIAS Fact-Based Investment Allocation Strategy principles as developed by the firm and their Sub-Advisors.

BASE PORTFOLIOS

Each of these portfolios are designed to play a core role in a client's investment plan. They blend three equity strategies and one fixed income strategy. Security selection is a combination of multi-factor linear and nonlinear regression ranking methods, technical analysis, and fundamental analysis as determined by Epic Capital and or the sub advisor. These portfolios are designed to outperform an appropriate blend of broad U.S equity and U.S Fixed income markets in both up and down markets.

Construction Methodology:

These portfolios are built by combining technical, fundamental, and quantitative methods and are designed to profit in bull markets and protect profits in bear markets. They are 100% tactical. Portfolios are dynamically monitored and updated as market conditions change.

The following represent the different Equity/Fixed Income target allocations but are subject to change as needs arise.

Portfolio	Equity Target	Fixed Income Target
Conservative	20%	80%
Moderately Conservative	40%	60%
Moderate	60%	40%
Moderately Aggressive	80%	20%
Aggressive	100%	0%

Additional Portfolio Options

Focused Dividend: This is a concentrated equity portfolio that seeks to invest in quality companies that provide an attractive yield and growth potential.

Construction Methodology - The portfolio is dynamically managed by blending fundamental analysis with quantitative methods and rebalances quarterly. The strategy seeks to double the dividend yield of the S&P 500, targets a beta of 1 or less, and seeks a one year expected total return equal to or greater than the S&P 500 while holding 5-20 stocks. This portfolio typically does not move to cash during bear markets as the emphasis is on income via dividend yield and capital appreciation. Individual call options may be bought or sold in this portfolio to increase yield (selling call options) or reducing downside risk (buying puts).

Focused Growth:

This portfolio provides clients with an adaptive stock portfolio constructed for all market conditions, resulting in reasonable risk-adjusted return compared to the general U.S stock market's performance. The Focused Growth strategy is a concentrated stock portfolio that seeks to perform like the S&P 500 price return index throughout market cycle but with a lower standard deviation, beta, correlation, and drawdown.

Construction Methodology - This strategy applies both fundamental and technical analysis, and blends three equity strategies while holding between 5 - 20 stocks. Unlike the Focused Dividend portfolio, this portfolio can move to 100% cash during periods of market uncertainty.

Focused Blend: The goal of the Focused Blend strategy is to provide clients with a semi-passive, tax aware portfolio constructed for long term market conditions, resulting in reasonable risk-adjusted total returns compared to the S&P 500. The strategy deploys a concentrated approach and target 20-40 securities.

Construction Methodology - The strategy adjusts to changing fundamental factors by rebalancing once per year and incorporates quantitative and qualitative analyses. The strategy begins by evaluating the top 10% of the stocks in the S&P 500, and then reweights and optimized the portfolio while considering each company's earnings certainty.

Focused Real Estate Portfolio: The goal of the Focused Real-estate strategy is to provide clients with an adaptive real-estate portfolio constructed for all market conditions, resulting in reasonable risk-adjusted total returns compared to the general U.S Real-estate market. The portfolio is a blend of active and passive management. Sixty percent of the portfolio seeks exposure to the general U.S Real-estate market (beta) based on the MSCI US Investable Market Real Estate 25/50 Index. Forty percent of the portfolio seeks excess (alpha) return exposure to the general U.S Real Estate market based on a momentum rotation ranking process. The strategy is tactical in that it can hold up to 40% cash or cash equivalents.

Construction Methodology - The strategy seeks to adjust to changing market fundamentals and technical factors by rebalancing quarterly and incorporates quantitative and qualitative analyses.

Subadvisor:

When deemed appropriate for the Client, Epic Capital, LLC may hire sub-advisors to manage all or a portion of the assets in the Client account. Epic Capital, LLC has full discretion to hire and fire sub-advisors as they deem suitable. Sub-advisors will maintain the models or investment strategies agreed upon between Sub-advisor and Epic Capital, LLC. Sub-advisors execute all trades on behalf of Epic Capital, LLC in Client accounts. Epic Capital, LLC will be responsible for the overall direct relationship with the Client. Epic Capital, LLC retains the authority to terminate the Sub-advisor relationship at Epic Capital, LLC's discretion.

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the Client may choose to compensate Epic Capital, LLC on a negotiable fixed fee basis described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, Insurance, Education Planning, Social Security Analysis, Retirement Income Planning and Mortgage Analysis.

SOLICITOR ARRANGEMENTS

Epic Capital, LLC solicits the services of third party money managers to manage Client accounts. In such circumstances, Epic Capital, LLC receives solicitor fees from the third party money manager. Epic Capital, LLC acts as the liaison between the Client and the third party money manager in return for an ongoing portion of the advisory fees charged by the third party money manager. Epic Capital, LLC helps the Client complete the necessary paperwork of the third party money manager, provides ongoing services to the Client, will provide the third party money manager with any changes in Client status as provided to Epic Capital, LLC, by the Client and review the quarterly statements provided by the third party money manager. Epic Capital, LLC will deliver the Form ADV Part 2, Privacy Notice and Solicitors Disclosure Statement of the third party money manager. Clients placed with third party money managers will be billed in accordance with the third party money manager's fee schedule which will be disclosed to the Client prior to signing an agreement. This is detailed in Item 10 of this brochure.

SEMINARS/WEBINARS

Epic Capital, LLC holds seminars and webinars to educate the public on different types of investments and the different services they offer. The seminars are educational in nature and no specific investment or tax advice is given. For seminar fees please refer to Item 5.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose

restrictions on investing in certain securities or types of securities. Agreements may not be assigned without Client consent.

Client Assets under Management

As of September 23, 2024 Epic Capital has zero client assets under management.

Item 5: Fees and Compensation

Methods of Compensation and Fee Schedule

ASSET MANAGEMENT

Epic Capital, LLC, offers discretionary and non-discretionary direct asset management services to advisory Clients. Epic Capital, LLC will offer Clients ongoing portfolio management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, assets allocation, portfolio monitoring and the overall investment program will be based on the above factors.

Fees for these services will be based on a percentage of assets under management as follows:

Assets Under Management	Annual Fee	Quarterly Fee
Up to \$1,000,000	1.75%	.44%
\$1,000,000 to \$3,000,000	1.0%	.25%
\$3,000,00 to \$5,000,000	.90%	.23%
Over \$5,000,00	Negotiable	Negotiable

The annual Fee may be negotiable. Accounts within the same household may be combined for a reduced fee. Fees are billed quarterly in based on the amount of assets managed as of the close of business on the last business day of each quarter. Quarterly advisory fees may be deducted directly from the Clients' account by the custodian or paid by the Client to Epic Capital, LLC within ten (10) days following the end of the quarter being billed. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement. Clients may terminate advisory services with thirty (30) days written notice. Epic Capital, LLC will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees.

Any sub advisor fees are included in the annual asset management fee as described by Epic Capital.

FINANCIAL PLANNING AND CONSULTING

Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, Retirement Income Distribution, Social Security, Mortgage Review, and Insurance and Super Charged Roth IRA Conversions. Prior to starting the planning process, the Client is provided an estimate of the total cost of the financial plan. The estimate is based upon information provided by the Client during the discovery process and the estimate may be changed if additional undisclosed or unexpected items require unforeseen implementation into the plan.

The payments are received in one payment by the client, and can be paid via Paypal, Venmo, Credit Card, or a check made payable to Epic Capital, LLC. Client may terminate the Agreement within five (5) business days of signing the agreement. If the Client terminates after five (5) business days, but before delivery or completion, Advisor is due a pro-rata fee based on the hours and/or the amount of work completed. In the event that a Client should cancel the financial planning agreement under which any plan is being created, the Client shall be billed for actual hours logged on the planning project times the agreed upon hourly rate. Any surplus in the Advisor's possession as the result of collecting a deposit at the time of signing the financial planning agreement will be returned to the Client within 5 business days of cancellation.

FIXED FEES

Financial planning services are offered based on a negotiable fixed fee ranging from \$500 to \$10,000 for a financial plan, the total of which is dependent upon the level and scope of these services.

HOURLY FEES

Financial Planning Services are offered based on an hourly fee of \$200 per hour. If hourly services extend past the amount of hours agreed upon by the Client, the Client must agree by signing an amended agreement or addendum to the agreement to include the additional hours to complete.

Financial plans will be presented within six (6) months of the contract date, provided that all information needed to prepare the financial plan has been promptly provided by the Clients.

SOLICITOR FEES

Epic Capital, LLC does not receive Solicitor Fees.

SEMINARS/WEBINARS

Epic Capital, LLC may charge up to \$50 per household to attend their seminars.

Additional Fees Charged

Custodians may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds. These charges may include mutual fund transaction fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security. For more details on the brokerage practices, see Item 12 of this brochure.

External Compensation for the Sale of Securities to Clients

Epic Capital, LLC does not receive any external compensation for the sale of securities to Clients, nor do any of the investment advisor representatives of Epic Capital, LLC.

Item 6: Performance-Based Fees

Epic Capital, LLC does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a Client).

Item 7: Types of Clients

Description

Epic Capital, LLC, provides investment advice to affluent high net worth individuals, typically retirees. Client relationships vary in scope and length of service.

Account Minimum

Epic Capital, LLC requires an account minimum of typically at least \$1,000,000 of either qualified or non-qualified monies. Household and related accounts can be combined to meet the threshold. This can be changed on a case-by-case basis at the discretion of the advisor.

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

Methods of Analysis

Epic Capital, LLC may utilize fundamental and technical analysis when managing Client's assets. Third Party Money Managers ("TPM") utilized by Epic Capital, LLC may use various methods of analysis to determine the proper strategy for the Client referred and these will be disclosed in the TPM's Form ADV Part 2. Investing in securities involves risk of loss that Clients should be prepared to bear.

Epic Capital, LLC utilizes fundamental analysis to provide review of investments for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. Morningstar is used to evaluate risks and PersonalFunds.com is used to evaluate the cost of the mutual funds.

When creating a financial plan, Epic Capital, LLC utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, Client documents such as tax returns and insurance policies.

In developing a financial plan for a Client, Epic Capital, LLC's analysis may include cash flow analysis, investment planning, risk management, tax planning, retirement income distribution planning, social security planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the Client's specific situation.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time. Each Client executes a New Client Application and/or a Risk Tolerance that documents their objectives and their desired investment strategy. Advisor may purchase index put options or sell call options in Client portfolios for protection on the downside of the underlying holdings. Index put options provide limited loss in the case of market decline. The degree of protection depends on the put strike price selected. As the index value decreases, the value of the protective puts can increase, to partially offset any losses seen in the value of the portfolios.

If based on the analysis, Epic Capital, LLC determines a Client will be placed with a third party money manager; the appropriate third party paperwork will be completed.

Other strategies may include long-term purchases, short-term purchases, trading, and option writing (including covered options, uncovered options or spreading strategies).

Security Specific Material Risks

Investing in securities involves risk of loss that the Client(s) should be prepared to bear. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Epic Capital, LLC:

- ✓ *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- ✓ *Market Risk:* The price of a security, bond, or mutual fund may drop in reaction to

tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- ✓ *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- ✓ *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- ✓ *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- ✓ *Business Risk:* These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- ✓ *Liquidity Risk:* Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- ✓ *Financial Risk:* Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

The risks associated with utilizing Third Party Money Managers ("TPM") include:

- ✓ *Manager Risk:* The TPM fails to execute the stated investment strategy
- ✓ *Business risk:* TPM has financial or regulatory problems

The specific risks associated with the portfolios of the TPM's which is disclosed in the TPM's Form ADV Part 2.

Item 9: Disciplinary Information

Criminal or Civil Actions

Epic Capital, LLC nor any of its employees have been involved in any criminal action.

Administrative Enforcement Proceedings

David Anthony owned Anthony Capital, LLC an advisory firm licensed in Colorado from 2008-2023.

Per www.Brokercheck.finra.org and Investment Advisor Public Disclosure - IAPD public sites:

“Anthony Capital, LLC was subject to examination by the Colorado Division of Securities in summer 2021, and the examination found multiple violations of the Colorado Securities Act ("Act") and the Rules Under the Colorado Securities Act ("Rules"). David Anthony ("Anthony") recommended alternative investments to clients of Anthony Capital, LLC including several Pooled Investment Vehicles ("PIVs") that he advised and issued, as well as private placements offered by third-party issuers, outside of the licensed investment adviser Anthony Capital, LLC. Anthony generally promoted the alternative investments as vehicles to convert traditional individual retirement account ("IRA") assets to self-directed Roth IRAs for future tax benefits. Allegations include, but are not limited to, (1.) engaging in dishonest and unethical conduct, (2.) failure to disclose the nature of the firm's advisory business in a brochure, (3.) failure to adequately disclose compensation and conflicts of interest, (4.) maintaining custody of client funds through management of eight (8) PIVs and conducting money movement of all funds in the PIVS without an independent gatekeeper, (5.) failure to disclose commissions in the Form ADV Part 1 or the Form ADV Part 2 Brochure, (6.) failure to disclose the relationship between Anthony and the Anthony PIVs in the Form ADV Part 1 or the Form ADV Part 2 Brochure, (7.) failure to deliver updated disclosure statements to clients, and (8.) failure to meet the net worth requirements of \$35,000.00 for firms that have custody of client funds or securities.”

Anthony denies all the allegations presented by the Division of Securities and was complying with the examiner's request for additional information throughout 2021. In February of 2022, Anthony contacted the examiner to verify that he was compliant with their requests and to see if anything else was needed. He heard nothing back from the examiner. A civil case was filed against Anthony Capital, on 3/1/2023 in Denver District Court, an asset freeze, receivership, and a restraining order were issued. A trial was set for 2/23/2023. Anthony made multiple requests to present evidence before the judge to refute the allegations which were denied. A Stipulation for Consent order was filed by the Commissioner on 12/7/2022 proposing to suspend investment advisor activities of Anthony Capital in Colorado and an agreement was made to temporarily suspend activities pending the outcome of the 2/23/2023 trial.

On 1/5/2023, a mediation was held, and a settlement was signed whereby Anthony neither agreed nor denied the allegations and agreed to a suspension of his Colorado investment advisor license for a period of 10 yrs, with the ability to reapply at the end of the term, under the premise that this would not impact his ability to operate as an advisor or an agent outside of Colorado. This was a suspension of the investment advisor license in Colorado only, not a revocation. These were the terms of the settlement agreement as presented by the commissioner. The

The next day, Anthony found out that the terms presented by the Commissioner were not true and immediately sought to overturn the settlement agreement and resume the scheduled trial to avoid the suspension of his license. The reason he signed the settlement was because of the promise by the Commissioner that he would be able to continue operating outside of Colorado. The Commissioner denied making such a promise as a condition of signing the agreement. Anthony, however, recorded the mediation hearing, and presented a transcript that clearly shows that this promise was made by the Commissioner, and that the settlement was done under false pretenses and should be voided.

The judge in the appeal did not read the transcript of the mediation and denied the appeal. A second appeal was made to reverse the settlement being that it was entered into under false pretenses. This appeal was also denied, and the case was closed on 9/15/2023. The reason for the denial was because the attorney for Anthony Capital failed to submit the appeal request on time, thus requiring an omission by the attorney of the error and the potential for a malpractice suit.

Anthony Capital never had the opportunity to refute the allegations presented by the commissioner and the state, and present evidence addressing all the allegations for complete exoneration. Multiple third-party experts and forensic accountants were scheduled to testify on Anthony's behalf and present evidence that the allegations by the state simply were not true, there was no misuse of client funds, and everything was done in accordance with the offering documents. The Commissioner could have agreed to the appeal to overturn the settlement agreement and have a trial but chose not to.

During the discovery process, Anthony found out that the state investigator had presented false testimony and evidence to the Judge and lied in his allegations of misconduct by Anthony Capital. It is unfortunate that this case ended on a technicality and that the truth was never able to come forth regarding the allegations. Interested parties are welcome to contact Epic Capital directly regarding the Anthony Capital, LLC settlement and get their questions answered.

Self-Regulatory Organization Enforcement Proceedings

Neither Epic Capital, LLC nor any of its employees have been involved in any self-regulatory enforcement proceedings.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither Epic Capital, LLC nor any of its employees are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Epic Capital, LLC nor its employees are registered or has an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

David M. Anthony is a licensed insurance agent and owns a tax planning firm, Optimal Tax, LLC. David Anthony could receive a fee and/or commissions where he would have a material financial interest from the sale of insurance products and receive compensation as the owner of the tax planning firm. From time to time, he may offer clients advice or products from those activities.

These practices represent a conflict of interest because they give an incentive to recommend products based on the commission or fees received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent or contractor of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

From time to time, Epic Capital, LLC may also utilize the services of a sub-advisor to manage Clients' investment portfolios. Sub-advisors will maintain the models or investment strategies agreed upon between Sub-advisor and Epic Capital, LLC. Sub-advisors execute all trades on behalf of Epic Capital, LLC in Client accounts. Epic Capital, LLC will be responsible for the overall direct relationship with the Client. Epic Capital, LLC retains the authority to terminate the Sub-advisor relationship at Epic Capital, LLC's discretion.

In addition to the authority granted to Epic Capital, LLC under the Agreement, Client will grant Epic Capital, LLC full discretionary authority and authorizes Epic Capital, LLC to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to Epic Capital, LLC in the Agreement. In addition, at Epic Capital, LLC's discretion, Epic Capital, LLC may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors.

This practice represents a conflict of interest as Epic Capital, LLC may select sub-

advisors who charge a lower fee for their services than other sub-advisors. This conflict is mitigated by disclosures, procedures, and by the fact that Epic Capital, LLC has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

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

Code of Ethics Description

The employees of Epic Capital, LLC, have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Epic Capital, LLC employees and addresses conflicts that may arise. The Code defines acceptable behavior for employees of Epic Capital, LLC. The Code reflects Epic Capital, LLC and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when employees buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Epic Capital, LLC's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Epic Capital, LLC may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Epic Capital, LLC's Code is based on the guiding principle that the interests of the Client are our top priority. Epic Capital, LLC's officers, directors, advisors, and other employees have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either employees or the company.

The Code applies to "access" persons. "Access" persons are employees who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Epic Capital, LLC will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Epic Capital, LLC, and its employees do not recommend to Clients publicly traded securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Epic Capital, LLC, and its employees may buy or sell securities that are also held by

Clients. In order to mitigate conflicts of interest such as trading ahead, employees are required to disclose all reportable securities transactions as well as provide the firm with copies of their brokerage statements.

The Chief Compliance Officer of Epic Capital, LLC, is David Anthony. He reviews all employee trades quarterly. The personal trading reviews addresses that the personal trading of employees does not affect the markets and that Clients of the firm receive preferential treatment over employee transactions.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Epic Capital, LLC does not maintain a firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Epic Capital, LLC may recommend the use of a particular broker-dealer such as Goldman Sachs, Interactive Brokers, Schwab, or may utilize a broker-dealer of the Client's choosing. Epic Capital, LLC will select appropriate brokers based on several factors including but not limited to their relatively low transaction fees and reporting ability. Epic Capital, LLC relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by Epic Capital, LLC.

- ✓ *Directed Brokerage*

In circumstances where a Client directs Epic Capital, LLC to use a certain broker-dealer, Epic Capital, LLC still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: Epic Capital, LLC's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among Clients and conflicts of interest arising from brokerage firm referrals.

- ✓ *Best Execution*

Investment advisors who manage or supervise Client portfolios on a discretionary basis have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. The firm does not receive any portion of the trading fees.

- ✓ *Soft Dollar Arrangements*

Epic Capital, LLC utilizes the services of custodial broker dealers. Economic benefits are received by Epic Capital, LLC which would not be received if Epic Capital, LLC did not give investment advice to Clients. These benefits

include: A dedicated trading desk, a dedicated service group and an account services manager dedicated to Epic Capital, LLC's accounts, ability to conduct "block" Client trades, electronic download of trades, balances and positions, duplicate and batched Client statements, and the ability to have advisory fees directly deducted from Client accounts.

Epic Capital, LLC does not maintain any soft dollar arrangements.

Aggregating Securities Transactions for Client Accounts

Epic Capital, LLC is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Epic Capital, LLC. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis.

Item 13: Review of Accounts

David M. Anthony, President and Chief Compliance Officer, reviews all accounts on at least a quarterly basis. Reviews consist of an examination of account performance against the investment policy established for each Client. More frequent reviews may be performed due to the Client's individual circumstances, economic conditions, general factors affecting the stock market, etc. If necessary, we will rebalance the portfolio based upon the Client's individual needs, stated goals and objectives. Clients will receive transaction confirmations and quarterly statements from the account custodian. Under financial planning services, the Client will receive a one-time written financial plan.

Item 14: Client Referrals and Other Compensation

Epic Capital, LLC receives a portion of the annual management fees collected by the Third-Party Money Managers to whom Epic Capital, LLC refers Clients.

These fees are part of the Epic Capital annual asset management fee.

This situation creates a conflict of interest because Epic Capital, LLC and/or its Investment Advisor Representative have an incentive to decide what Third Party Money Managers to use because of the higher solicitor fees to be received by Epic Capital, LLC. However, when referring Clients to a third party money manager, the Client's best interest will be the main determining factor of Epic Capital, LLC. Details of the conflicts of interest are detailed in Item 10 of this brochure.

Item 15: Custody Account Statements

No Client money resides at Epic Capital, LLC. Furthermore, we do not perform the accounting functions including transaction confirmations and monthly statements. All this is handled for Client protection by a third-party qualified as a custodian and offering SPIC and FDIC insurance coverage. The custodians provide account statements directly to Clients at their address of record at least quarterly. Epic Capital, LLC Clients are

encouraged to carefully review all statements and Other reports from the custodian which show transactions, balances, account activity, fee payments, and commissions incurred, etc.

Epic Capital, LLC is deemed to have constructive custody solely because advisory fees are directly deducted from Clients' accounts by the custodian on behalf of Epic Capital, LLC, and see Item 5 for full disclosure.

Item 16: Investment Discretion

Discretionary Authority for Trading

Epic Capital, LLC receives discretionary authority from the Client at the outset of an advisory relationship to select the identity, amount and timing of securities to be bought or sold. When making these decisions, Epic Capital, LLC observes the investment policies, limitations and restrictions of the individual Clients for which it advises.

The Client approves the custodian to be used and the commission rates paid to the custodian. Epic Capital, LLC does not receive any portion of the transaction fees or commission paid by the Client to the custodian on certain trades. Clients may establish investment guidelines and/or restrictions on Epic Capital, LLC's authority by written agreement.

Item 17: Voting Client Securities

Proxy Votes

Epic Capital, LLC, does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Epic Capital, LLC will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because Epic Capital, LLC does not serve as a custodian for Client funds or securities and Epic Capital, LLC does not require prepayment of fees of more than \$500 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair our Ability to Meet contractual commitments to clients

Epic Capital, LLC has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Neither Epic Capital, LLC nor its management has had any bankruptcy petitions in the last ten years.

Item 19: Requirements for State Registered Advisors

Education and business background, including any outside business activities for all management and supervised persons can be found in the Supplement to this Brochure (Part 2B attached of Form ADV Part 2).

Material Relationship Maintained by this Advisory Business or Management persons with Issuers of Securities

There are no material relationships to report.

Supervised Person Brochure

Part 2B of Form ADV

David M. Anthony

Epic Capital Wealth Advisors, LLC

345 W. 600 S. #115

Heber City, UT 84032

435-657-2436 Direct

This brochure supplement provides information about David M. Anthony and supplements Epic Capital, LLC's brochure. You should have received a copy of that brochure. Please contact David Anthony if you did not receive Epic Capital, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about David Anthony (CRD #3068955) is available on the SEC's website at www.adviserinfo.sec.gov

September 23, 2024

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officers and Management Persons

David M. Anthony

Educational Background and Business Experience

Educational Background:

- ✓ Date of Birth: 1975
- ✓ Utah State University; BA, Finance. Minors: Economics, Personal Financial Planning, Spanish; 2001

Business Experience:

- ✓ Anthony Capital, LLC; President/Investment Advisor Representative; 05/2013-2023
- ✓ Optimal Mortgage, LLC; President/Mortgage Broker; 5/2016-Present NMLS #1492660
- ✓ Side by Side Quotes.com, LLC; President/Insurance Agent; 11/2012-Present
- ✓ Optimal Tax, LLC; President; 3/2020-Present
- ✓ Hold Brothers Online Investment Services, LLC; Securities Trader; 08/2008-11/2008
- ✓ Hold Brothers Online Investment Services, LLC; Securities Trader; 03/2005-12/2006
- ✓ Anthony Financial Services; President; 06/2004-06/2006
- ✓ Merrill Lynch; Financial Advisor 2004
- ✓ UBS Paine Webber; Financial Advisor 2002-2003

Professional Certifications

David Anthony has earned the following certifications and credentials:

- * *Certified Financial Planner™(CFP®)---2004-2022
- * *Retirement Management AnalystSM (RMA®) --- 2012-2023
- *Currently renewing as of 09/23/2024

The **Certified Financial Planner** (CFP) designation is a professional certification mark for financial planners conferred by the Certified Financial Planner Board of Standards (CFP Board) in the United States.

To earn the CFP Board designation, candidates must meet several requirements—the first of which is the educational requirement, which requires candidates to have a bachelor's degree or higher from an accredited U.S. college or university. As a first step to the present CFP certification criteria, students must master a list of nearly 1,000 topics on integrated financial planning. The topics cover major planning areas such as:

- ✓ General Principles of Finance and Financial Planning
- ✓ Insurance Planning
- ✓ Employee Benefits Planning
- ✓ Investment and Securities Planning
- ✓ State and Federal Income Tax Planning
- ✓ Estate Tax, Gift Tax, and Transfer Tax Planning
- ✓ Asset Protection Planning
- ✓ Retirement Planning
- ✓ Estate Planning

To fulfill the education requirement, students are required to complete course training in the above listed topic areas in order to meet the first requirement to sit for the ten hour CFP Board Certification Examination. A bachelor's degree (or higher), or its equivalent in any discipline, from an accredited college or university is required to attain certification.

After passing the examination, the candidate must demonstrate to have extensive experience in the financial planning field. The CFP Board defines work experience as "the supervision, direct support, teaching or personal delivery of all or part of the personal financial planning process to a Client" and such experience must fall within one or more of the following six primary elements of financial planning:

- ✓ Establishing and Defining the Client Relationship
- ✓ Gathering Client Data and Goals
- ✓ Analyzing and Evaluating the Client's Financial Status
- ✓ Developing and Presenting Financial Planning Recommendations and Alternatives
- ✓ Implementing the Financial Planning Recommendations
- ✓ Monitoring the Financial Planning Recommendations

After the student passes the exam and meets one or more of the six primary elements of financial planning, he or she must also have completed the following:

- ✓ Three years full-time or equivalent (2,000 hours per year) part-time experience in the financial planning field
- ✎ Be approved by the CFP Board during initial certification, which also involves an extensive background check—including an ethics, character and criminal check.

The **Retirement Management Analyst (RMA®)** designation is a rigorous educational and ethics training curriculum that teaches financial advisors the RIA Advisory Process to provide successful retirement income solutions to Clients. The RMA® designation is focused specifically on key concepts and practical applications of retirement income planning and management, as well as the construction of portfolios to support retirement income. The RMASM charter holder distinguishes himself as a retirement income specialist.

Financial Advisors who earn the RMA® certification show their Clients and prospective Clients their commitment to providing the best possible guidance in retirement income planning and management.

The RMA® certification is the only one across the industry to focus specifically on providing retirement income planning and management centered on structuring a plan built on the solid foundation of "first build a floor and then expose to upside potential." It's a holistic

advisory process, which takes into account establishing a floor for secure retirement income, but also providing inflation protection and potential growth.

Disciplinary Information

David Anthony is suspended as an investment advisor in the state of Colorado from 5/2023 to 5/2033 per a settlement agreement. At the end of the term, he is able to reapply.

Other Business Activities

David M. Anthony owns a separate tax planning firm and is an independent insurance agent. David Anthony could receive a fee and/or commissions where he would have a material financial interest. From time to time, he may offer clients advice or products from those activities.

These practices represent a conflict of interest because they give an incentive to recommend products based on the commission or fees received. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent or contractor of their choosing.

Additional Compensation and Performance Based Fee Description

Mr. Anthony receives additional compensation in his capacity as an insurance agent and for his tax planning company, but he does not receive any performance-based fees. For more details, see Item 10 of the Form ADV Part 2A.

Supervision

Mr. Anthony is the sole owner of Epic Capital, LLC; therefore, he is solely responsible for all supervision and formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in the firm's Compliance Manual.

Requirements for State-Registered Advisors

Arbitration Claims: Mr. Anthony has had no arbitration claims.

Self-Regulatory Organization or Administrative Proceeding: Mr. Anthony has no self-regulatory organization or administrative proceedings to disclose.

Bankruptcy Petition: Mr. Anthony has never filed for bankruptcy.

SEC Registered Advisor

Registration as an SEC advisor under rule 203A-2(c).