

## **Epic Funds LLC**

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### **Form ADV Part 2A Firm Brochure March 27, 2018**

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](http://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.

### Item 3 – Table of Contents

Item 2 - Material Changes.....	2
Item 3 – Table of Contents.....	3
Item 4 – Advisory Business .....	4
Item 5 – Fees and Compensation .....	4
Item 6 – Performance-Based Fees and Side by Side Management .....	4
Item 7 – Types of Clients.....	5
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss.....	5
Item 9 – Disciplinary Information .....	5
Item 10 – Other Financial Industry Activities and Affiliations .....	6
Item 11 – Code of Ethics, Participation or Interest in Client Transaction and Personal Trading.....	6
Item 12 – Brokerage Practices .....	7
Item 13 – Review of Accounts.....	7
Item 14 – Client Referrals and Other Compensation.....	7
Item 15 – Custody.....	7
Item 16 – Investment Discretion .....	7
Item 17 – Voting Client Securities.....	8
Item 18 – Financial Information.....	8

## 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 a Money Monitor™, which 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

We charge a monthly subscription fee that ranges from \$37 to \$100 per month.

### FEE BILLING

Our fee is billed monthly, in *advance*, meaning that we collect the management fee *at the beginning of* the one-month billing period.

### 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 and receive a prorated refund of any unearned monthly fees as of the termination date.

## 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

Our advice is limited to a client's predetermined purchase and sale prices.

### INVESTMENT RISKS

All investment programs have certain risks that are borne by the client and **investing in securities involves risk of loss that clients should be prepared to bear**. Some of the risk associated with investing in securities include, but are not limited to:

- ) **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

We do not recommend any specific securities to the clients. We monitor the securities transactions of all owners and supervised persons for violations. We also require all supervised persons and owners to report any violations of the Code of Ethics to our Chief Compliance Officer.

## **Item 12 – Brokerage Practices**

### RECOMMENDATION CRITERIA

We do not recommend brokerage firms to clients.

### 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 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 from any brokerage firm.

### BROKERAGE FOR CLIENT REFERRALS

We do not receive client referrals or any other incentive from any broker-dealer or custodian.

### TRADE AGGREGATION

We do not trade client accounts. This section is not applicable.

## **Item 13 – Review of Accounts**

### PERIODIC REVIEWS

Money Monitor continuous monitors a client’s account. It sends alerts to clients 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 receive extra compensation or any other economic benefit for providing investment advice or other advisory services to clients.

### 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 quarterly 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 non-discretionary investment management services. The client will be free to manage the account with or without our recommendation and all with or without our prior consultation.

### **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.