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FORM ADV PART 2A BROCHURE

This brochure provides information about the qualifications and business practices of Epic Wealth Management, LLC. If you have any questions about the contents of this brochure, contact us at 405-257-0301. 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.

Additional information about Epic Wealth Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov.

Epic Wealth Management, LLC is a registered investment adviser. Registration with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Item 2 Summary of Material Changes

This brochure is a document which Epic Wealth Management provides to its clients as required by the SEC's rules. The purpose of Item 2 of the brochure is to provide clients with a summary of new and/or updated information that is contained in the remainder of the Brochure.

Since the filing of the previous brochure on March 31, 2021, the following material changes have occurred:

Item 4 – The Firm has undergone a change in ownership. Rick Hadrava is no longer an owner of Epic Wealth Management. Valery Oswald is the sole owner of the Firm.

Item 4 – The Firm added language stating its fiduciary status as it relates to rollover recommendations.

Item 10 – The Firm removed language stating it did not have any other financial affiliations. The Firm has also removed mentions of Business Advisory Solutions, as that entity is no longer affiliated with the firm.

Item 20 – The Firm removed language as it related to rollover considerations.

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Item 4 Advisory Business

Description of Firm

Epic Wealth Management, LLC ("Epic Wealth Management" or "Epic") is a registered investment adviser primarily based in Oklahoma City, Oklahoma. We are organized as a limited liability company ("LLC") under the laws of the State of Oklahoma. We have been providing investment advisory services since 07/02/2018. We are primarily owned by BE, LLC and we are indirectly owned by Valery Oswald.

The following paragraphs describe our services and fees. Refer to the description of each investment advisory service listed below for information on how we tailor our advisory services to your individual needs. As used in this brochure, the words "firm," "we," "our," and "us" refer to Epic Wealth Management and the words "you," "your," and "client" refer to you as either a client or prospective client of our firm.

Portfolio Management Services

We offer discretionary portfolio management services. Our investment advice is tailored to meet our clients' needs and investment objectives. At the beginning of a client relationship, Epic Wealth Management talks with the client, gathers information, and performs research and analysis as necessary to develop the client's Investment Plan. The Investment Plan will be updated from time to time when requested by the client, or when determined to be necessary or advisable by Epic Wealth Management based on updates to the client's financial or other circumstances, but is not necessarily a written document.

Epic Wealth Management views investment management as part of the comprehensive financial plan. We use varying tools and experiences to guide us in recommending an appropriate asset allocation to help our clients achieve their goals. These may include, but are not limited to:

1. Long-Term Cash Flow Projections - The basis of any investment recommendations come from a comprehensive review of our client's cash flow needs, now and in the future, the ability to define realistic expectations, comfort with risk, and time horizon for needing to access resources from their assets. We may use cash flow projections to determine to the best of our ability when assets might be needed, the tax consequences of withdrawing from specific accounts, and whether a recommended portfolio would have the ability to create returns necessary to achieve the wants and needs of our clients.
2. Risk Discussions With Clients - In addition to the more technical data points mentioned above, we rely heavily on the ongoing communications with our clients and our understanding of their personal financial situation to give additional support for a certain recommended asset allocation.

After taking all of the pertinent information into account, we will recommend a portfolio based on an agreed upon level of risk. Epic Wealth Management then selects the appropriate securities to fill the asset allocation, based in part upon the clients specific tax and other financial planning considerations. We regularly monitor each client's portfolio and may rebalance a client's portfolio based on the clients' needs. Overriding factors could be, but are not limited to, tax consequences and other client specific factors.

If you participate in our discretionary portfolio management services, we require you to grant our firm discretionary authority to manage your account. Discretionary authorization will allow us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. Discretionary authority is typically granted by an investment advisory agreement between you and Epic Wealth Management and the appropriate trading authorization forms.

We may also offer non-discretionary portfolio management services. If you enter into non-discretionary arrangement with our firm, we must obtain your approval prior to executing any transactions on behalf of your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

As part of our portfolio management services, in addition to other types of investments (see disclosures below in this section), we may invest your assets according to one or more model portfolios developed by our firm. These models are designed for investors with varying degrees of risk tolerance ranging from a more aggressive investment strategy to a more conservative investment approach. Clients whose assets are invested in model portfolios may not set restrictions on the specific holdings or allocations within the model, nor the types of securities that can be purchased in the model.

In providing account management services, we do not accept client restrictions on the specific securities or the types of securities that may be held in your account.

Epic Wealth Management offers the following portfolio management services: (i) investment and management of a client's assets in an Independent Clearing Account ("ICA"); (ii) investment and management of a client's assets in a Raymond James Consulting Services ("RJCS") separately-managed account ("SMA"); and (iii) investment and management of a client's assets through the Freedom Wrap Program sponsored by Raymond James & Associates. ("Raymond James") member NYSE /SIPC.

Independent Clearing Accounts (ICA)

ICA accounts are typically managed by Epic Wealth Management on a discretionary or non-discretionary basis.

Raymond James Consulting Services SMA Program

Client accounts in the RJCS SMA program will receive portfolio management by a third-party manager registered with the SEC ("SMA Manager"), which includes SMA Managers affiliated with Raymond James. These SMA Managers' services are made available to clients based on Raymond James' familiarity with the SMA Managers' firm, portfolio management personnel, investment disciplines offered, portfolio construction and Raymond James' overall belief that the participation of these SMA Managers in the program will provide prospective clients access to high quality investment firms. Epic Wealth Management will monitor the investment approach and performance of the SMA Managers.

For further information on the RJCS SMA program, please refer to Raymond James' Form ADV Part 2A Wrap Fee Appendix 1.

Freedom Wrap Program

The Freedom Wrap Program ("Freedom") is comprised of fee-based platforms with models constructed by the Raymond James Asset Management Services ("AMS") Institutional Research team and populated by the AMS Due Diligence team with oversight from the AMS Investment Committee.

All Freedom portfolios generally can be divided into the following groups:

- **Accumulation**
 - **Core Models:** Appropriate for investors seeking to grow their assets using a diversified portfolio whose goal is to maximize the return potential at a given level of risk.
 - **Specialty Models:** Appropriate for investors seeking to grow their assets within a specialized portfolio concentrated on a specific segment of the market.
- **Income/Distribution**
 - **Core Models:** Appropriate for investors seeking higher income with more focus on downside protection using a diversified portfolio in an effort to maximize the return potential at a given level of risk.
 - **Specialty Models:** Appropriate for investors seeking higher income with more focus on downside protection within a specialized portfolio concentrated on a specific segment of the market.

For further information on the Freedom Wrap Program, please refer to Raymond James' Form ADV Part 2A Wrap Fee Appendix 1.

Selection of SMA Managers

As part of our portfolio management services in the RJCS SMA program and the Freedom Wrap Program, we select SMA Managers on behalf of clients for investment management services. SMA Managers may use one or more of their model portfolios to manage client accounts. We will regularly monitor the performance of client accounts managed by SMA Managers, and may hire and fire any SMA Managers without your prior approval. Factors that Epic Wealth Management considers in selecting an SMA Manager for a client account generally include the client's stated investment objective(s), management style, performance, risk level, reputation, financial strength, reporting, pricing, and research.

Types of Investments

We primarily offer advice on stocks, mutual funds, exchange-traded funds ("ETFs"), UITs, CDs, and government, corporate, and municipal Bonds. Refer to *Item 8 - Methods of Analysis, Investment Strategies and Risk of Loss* for additional disclosures on this topic.

Additionally, we may advise you on various types of investments based on your stated goals and objectives. We may also provide advice on any type of investment held in your portfolio at the inception of our advisory relationship.

Rollover Recommendations

As part of our investment advisory services to you, we may recommend that you withdraw the assets from your employer's retirement plan and roll the assets over to an individual retirement

account ("IRA") that we will manage on your behalf. If you elect to roll the assets to an IRA that is subject to our management, we will charge you an asset-based fee as set forth in the agreement you executed with our firm. This practice presents a conflict of interest because persons providing investment advice on our behalf have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Moreover, if you do complete the rollover, you are under no obligation to have the assets in an IRA managed by our firm.

Many employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of: 1)) Leaving the funds in your employer's (former employer's) plan; 2) moving the funds to a new employer's retirement plan; 3) cashing out and taking a taxable distribution from the plan; and/or 4) rolling the funds into an IRA rollover account. Each of these options has advantages and disadvantages and before making a change we encourage you to speak with your CPA and/or tax attorney. Our recommendations may include any of them, depending on what we feel is in your best interest.

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. As a fiduciary, we are required to document the reason(s) for why the recommendation we made is in your best interest.

Assets Under Management

As of December 31, 2022, Epic Wealth Management manages approximately \$92,058,636 on a discretionary basis.

Item 5 Fees and Compensation

Portfolio Management Fees

Epic Wealth Management receives investment advisory fees for managing clients' assets in ICA accounts, accounts in the RJCS SMA program and accounts in the Freedom Wrap Program. These advisory fees are based on a percentage of assets under management. The annual fee for portfolio management services varies between 0% to 2% for ICA accounts and 0% to 3% for accounts in the RJCS SMA program and accounts in the Freedom Wrap Program. With respect to accounts in the RJCS SMA program and accounts in the Freedom Wrap Program, a portion of the investment advisory fee will be paid to one or more SMA Managers, and the portion of the investment advisory fees retained by Epic Wealth will never be greater than 2.0%. The amount of the annual fee for portfolio management services depends upon the market value of your assets under our management, the type and complexity of the asset management services provided, as well as the level of administration requested either directly or assumed by the client and will be identified in your investment advisory agreement with us. Assets in each of your account(s) are included in the fee assessment unless specifically identified in writing for exclusion. In special circumstances, and in our sole discretion, we may negotiate a lesser fee based upon certain criteria (*i.e.*, the dollar amount of assets to be managed, related accounts,

potential future assets, account composition, pre-existing client relationship, account retention, etc.).

Clients enter into one of two fee arrangements. For most discretionary portfolio management services, clients participate in a Wrap Fee Program (a "Wrap Program"). Wrap Programs offer you the ability to pay an asset-based advisory fee which includes transaction costs within the advisory fee in lieu of a commission for each investment transaction within the account.

The Wrap Program fee structure includes the brokerage expenses (e.g., commissions, ticket charges, etc.) of the account, charges for custody services, the management fee paid to Epic Wealth Management and the fees of the SMA Managers. Under the all-inclusive billing arrangement, Epic Wealth Management will assess one client fee that captures the management, brokerage, custody and administrative portions collectively. Any portion of Wrap Program fees that Epic Wealth Management does not pay to third parties in connection with transaction and execution expenses and/or to SMA Managers is retained by Epic Wealth Management. Because of this, Epic Wealth Management may have a disincentive to trade securities in client accounts. For ICA accounts, the Wrap Program is sponsored by Epic Wealth Management, and for accounts in the RJCS SMA program and in the Freedom Wrap Program, the Wrap Program is sponsored by Raymond James.

Epic Wealth Management typically requires a minimum portfolio asset value size of \$500,000 per household, but may, in its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Epic Wealth Management deems it appropriate under the circumstances.

For Wrap Programs sponsored by Raymond James, if cash or securities, or a combination thereof, are deposited to or withdrawn from a client's account on an individual business day in the first two months of the quarter, Raymond James will: (i) assess asset-based fees based on the value of the assets on the date of deposit for the pro rata number of days remaining in the quarter, or (ii) refund prepaid asset-based fees based on the value of the assets on the date of withdrawal for the pro rata number of days remaining in the quarter. Please see the Raymond James Wrap fee Program Brochure for more information on this program or other Raymond James account programs listed herein.

For certain discretionary portfolio management services with respect to ICA accounts and for all non-discretionary portfolio management services, clients will pay Epic Wealth Management a management fee that is separate from the brokerage expenses and transaction costs of the account. The brokerage expenses may take the form of asset-based pricing, meaning that the broker-dealer charges the account a flat-rate percentage to cover all brokerage expenses, or these expenses may be assessed on a per-trade basis. Please see *Item 12 - Brokerage Practices* for additional information.

General Information on Compensation and Other Fees

As part of our Portfolio Management Services, we also offer the following services, which clients may or may not choose to utilize, at no additional fee:

Personal Financial Services

- Personal Financial Modeling
- Investment Tax Planning
- Estate Planning and Wealth Transfer Consulting
- Investment Analysis

- Portfolio Management
- Retirement Income Planning
- Fixed Income Analysis

Our annual portfolio management fee is billed and payable, quarterly in advance, based on the balance of the account on the last business day of the previous calendar quarter. The fee is based on the market value of your assets under our management, the type and complexity of the asset management services provided, as well as the level of administration requested either directly or assumed by the client. Assets in each of your account(s) are included in the fee assessment unless specifically identified in writing for exclusion.

If the portfolio management agreement is executed at any time other than the first day of a calendar quarter, our fees will apply on a pro rata basis, which means that the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. Our advisory fee is negotiable and may be waived in whole or in part depending on individual client circumstances and in our discretion.

At our discretion, we may combine the account values of family members living in the same household to determine the applicable advisory fee. For example, we may combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts. Combining account values may increase the asset total, which may result in your paying a reduced advisory fee based on the available breakpoints in our fee schedule stated above.

We will invoice the custodian and deduct our fee directly from your account through the qualified custodian holding your funds and securities. We will deduct our advisory fee only when you have given our firm written authorization permitting the fees to be paid directly from your account. Further, the qualified custodian will deliver an account statement to you at least quarterly. These account statements will show all disbursements from your account. You should review all statements for accuracy.

You may terminate the portfolio management agreement upon 30 days written notice. You will incur a pro rata charge for services rendered prior to the termination of the portfolio management agreement, which means you will incur advisory fees only in proportion to the number of days in the quarter for which you are a client. If you have pre-paid advisory fees that we have not yet earned, you will receive a prorated refund of those fees.

Additional Fees and Expenses

As part of our investment advisory services to you, we may invest, or recommend that you invest, in mutual funds, exchange traded funds ("ETFs"), or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials). The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian through whom your account transactions are executed. We do not share in any portion of the brokerage fees/transaction charges imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, exchange traded funds, our firm,

and others. For information on our brokerage practices, refer to the *Item 12 - Brokerage Practices*.

We may trade client accounts on margin. When we are requested to trade client accounts on margin, each client must sign a separate margin agreement before margin is extended to that client account. Fees for advice and execution on these securities are based on the total asset value of the account, which includes the value of the securities purchased on margin. While a negative amount may show on a client's statement for the margined security as the result of a lower net market value, the amount of the fee is based on the absolute market value. This creates a conflict of interest where we have an incentive to encourage the use of margin to create a higher market value and therefore receive a higher fee. The use of margin may also result in interest charges in addition to all other fees and expenses associated with the security involved.

All fees paid to Epic Wealth Management are separate and distinct from mark-ups and mark-downs, spreads paid to market makers, fees for trades executed away from the custodian, wire transfer fees, account closing fees, annual account fees and other fees and taxes on brokerage accounts and securities transactions. You should review all fees charged by funds, brokers, Epic Wealth Management and others to fully understand the total amount of fees paid by the client for investment and financial-related services.

Compensation for the Sale of Securities or Other Investment Products

Certain persons providing investment advice at our firm are licensed insurance agents. These persons are registered with state insurance boards of the states in which they sell insurance products. As a wealth management firm, Epic recommends the use of various insurance products during our financial planning recommendations where we believe it is in your best interest. You should be aware that insurance products pay a commission or other compensation and therefore represent a conflict of interest. Commission-based products are subject to a different standard of conduct than that of the fiduciary duty of a registered investment advisor. Epic always seeks to act in the best interest of the client, including when we recommend insurance products to our advisory clients, and we will disclose the commission prior to the sale. If a financial plan recommends the use of an insurance product, you are in no way required to implement the plan through any representative of Epic in such individual's capacity as an insurance agent.

Item 6 Performance-Based Fees and Side-By-Side Management

We do not accept performance-based fees or participate in side-by-side management. Performance-based fees are fees that are based on a share of a capital gains or capital appreciation of a client's account. Side-by-side management refers to the practice of managing accounts that are charged performance-based fees while at the same time managing accounts that are not charged performance-based fees. Our fees are calculated as described in *Item 5 - Fees and Compensation*, and are not charged on the basis of a share of capital gains upon, or capital appreciation of, the funds in your advisory account.

Item 7 Types of Clients

We offer investment advisory services to individuals, including high net worth individuals, charitable organizations, corporations or other businesses not listed above and business owners.

Epic Wealth Management typically requires a minimum portfolio asset value size of \$500,000 per

household, but may, in its discretion, make exceptions to the foregoing or negotiate special fee arrangements where Epic Wealth Management deems it appropriate under the circumstances.

We may also combine account values for you and your minor children, joint accounts with your spouse, and other types of related accounts to meet the stated minimum.

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

Our Methods of Analysis and Investment Strategies

We may use one or more of the following methods of analysis or investment strategies when providing investment advice to you:

Long-Term Purchases - securities purchased with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year.

Risk: Using a long-term purchase strategy 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 you are invested in or perhaps just your particular 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.

Short-Term Purchases - securities purchased with the expectation that they will be sold within a relatively short period of time, generally less than one year, to take advantage of the securities' short-term price fluctuations.

Risk: Using a short-term purchase strategy generally assumes that we can predict how financial markets will perform in the short-term which may be very difficult and will incur a disproportionately higher amount of transaction costs compared to long-term trading. There are many factors that can affect financial market performance in the short-term (such as short-term interest rate changes, cyclical earnings announcements, etc.) but may have a smaller impact over longer periods of times.

Margin Transactions - a securities transaction in which an investor borrows money to purchase a security, in which case the security serves as collateral on the loan.

Risk: If the value of the shares drops sufficiently, the investor will be required to either deposit more cash into the account or sell a portion of the stock in order to maintain the margin requirements of the account. This is known as a "margin call." An investor's overall risk includes the amount of money invested plus the amount that was loaned to them.

Option Writing - a securities transaction that involves selling an option. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell a particular security at a specified price on or before the expiration date of the option. When an investor sells a call option, he or she must deliver to the buyer a specified number of shares if the buyer exercises the option. When an investor sells a put option, he or she must pay the strike price per share if the buyer exercises the option, and will receive the specified number of shares. The option writer/seller receives a premium (the market price of the option at a particular time) in exchange for writing the option.

Risk: Options are complex investments and can be very risky, especially if the investor does

not own the underlying stock. In certain situations, an investor's risk can be unlimited.

At times, clients may request to retain an investment in their portfolio that represents a large portion of their portfolio (a "concentrated stock position") indefinitely. There is a risk in maintaining a concentrated stock position in that the investment portfolio is less diversified than it would be if it did not hold a concentrated stock position. As a result, the investment portfolio will be more exposed to the risks associated with and developments affecting a single company than a more diversified portfolio that is invested more broadly.

Our investment strategies and advice may vary depending upon each client's specific financial situation. As such, we determine investments and allocations based upon your predefined objectives, risk tolerance, time horizon, financial information, liquidity needs and other various suitability factors. Your restrictions and guidelines may affect the composition of your portfolio. **It is important that you notify us immediately with respect to any material changes to your financial circumstances, including for example, a change in your current or expected income level, tax circumstances, or employment status.**

We will not perform quantitative or qualitative analysis of individual securities. Instead, we will advise you on how to allocate your assets among various classes of securities or SMA Managers. We primarily rely on investment model portfolios and strategies developed by SMA Managers and their portfolio managers. We may replace/recommend replacing an SMA Manager if there is a significant deviation in characteristics or performance from the stated strategy and/or benchmark.

Tax Considerations

Our strategies and investments may have unique and significant tax implications. However, unless we specifically agree otherwise, and in writing, tax efficiency is not our primary consideration in the management of your assets. Regardless of your account size or any other factors, we strongly recommend that you consult with a tax professional regarding the investing of your assets.

Custodians and broker-dealers must report the cost basis of equities acquired in client accounts. Your custodian will default to the First-In First-Out ("FIFO") accounting method for calculating the cost basis of your investments. You are responsible for contacting your tax advisor to determine if this accounting method is the right choice for you. If your tax advisor believes another accounting method is more advantageous, provide written notice to our firm immediately and we will alert your account custodian of your individually selected accounting method. Decisions about cost basis accounting methods will need to be made before trades settle, as the cost basis method cannot be changed after settlement.

Risk of Loss

Investing in securities involves risk of loss that you should be prepared to bear. We do not represent or guarantee that our services or methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate clients from losses due to market corrections or declines.

We cannot offer any guarantees or promises that your financial goals and objectives will be met. Past performance is in no way an indication of future performance.

Other Risk Considerations

When evaluating risk, financial loss may be viewed differently by each client and may depend on many different risks, each of which may affect the probability and magnitude of any potential losses. The following risks may not be all-inclusive, but should be considered carefully by a prospective client before retaining our services.

Liquidity Risk: The risk of being unable to sell your investment at a fair price at a given time due to high volatility or lack of active liquid markets. You may receive a lower price or it may not be possible to sell the investment at all.

Credit Risk: Credit risk typically applies to debt investments such as corporate, municipal, and sovereign fixed income or bonds. A bond issuing entity can experience a credit event that could impair or erase the value of an issuer's securities held by a client.

Inflation and Interest Rate Risk: Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of a client's future interest payments and principal. Inflation also generally leads to higher interest rates which may cause the value of many types of fixed income investments to decline.

Horizon and Longevity Risk: The risk that your investment horizon is shortened because of an unforeseen event, for example, the loss of your job. This may force you to sell investments that you were expecting to hold for the long term. If you must sell at a time that the markets are down, you may lose money. Longevity Risk is the risk of outliving your savings. This risk is particularly relevant for people who are retired, or are nearing retirement.

Management Risks. While Epic Wealth Management manages client investment portfolios or selects one or more sub-advisers based on Epic Wealth Management's experience, research and proprietary methods, the value of client investment portfolios will change daily based on the performance of the underlying securities in which they are invested. Accordingly, client investment portfolios are subject to the risk that Epic Wealth Management or a sub-adviser allocates assets to asset classes that are adversely affected by unanticipated market movements, and the risk that Epic Wealth Management's or a sub-adviser's specific investment choices could underperform their relevant indexes.

Economic Conditions. Changes in economic conditions, including, for example, interest rates, inflation rates, employment conditions, competition, technological developments, political and diplomatic events and trends, and tax laws may adversely affect the business prospects or perceived prospects of companies. While Epic Wealth Management or a sub-adviser performs due diligence on the companies in whose securities it invests, economic conditions are not within the control of Epic Wealth Management or the sub-adviser and no assurances can be given that Epic Wealth Management or the sub-adviser will anticipate adverse developments.

Recommendation of Particular Types of Securities

We primarily recommend mutual funds, ETFs, CDs, and government, corporate, and municipal bonds. However, we may advise on other types of investments as appropriate for you since each client has different needs and different tolerance for risk. Each type of security has its own unique set of risks associated with it and it would not be possible to list here all of the specific risks of every type of investment. Even within the same type of investment, risks can vary widely.

However, in very general terms, the higher the anticipated return of an investment, the higher the risk of loss associated with the investment.

Money Market Funds: A money market fund is technically a security. The fund managers attempt to keep the share price constant at \$1/share. However, there is no guarantee that the share price will stay at \$1/share. If the share price goes down, you can lose some or all of your principal. The U.S. Securities and Exchange Commission ("SEC") notes that "While investor losses in money market funds have been rare, they are possible." In return for this risk, you should earn a greater return on your cash than you would expect from a Federal Deposit Insurance Corporation ("FDIC") insured savings account (money market funds are not FDIC insured). Next, money market fund rates are variable. In other words, you do not know how much you will earn on your investment next month. The rate could go up or go down. If it goes up, that may result in a positive outcome. However, if it goes down and you earn less than you expected to earn, you may end up needing more cash. A final risk you are taking with money market funds has to do with inflation. Because money market funds are considered to be safer than other investments like stocks, long-term average returns on money market funds tends to be less than long term average returns on riskier investments. Over long periods of time, inflation can eat away at your returns.

Certificates of Deposit: Certificates of deposit are generally the safest type of investment since they are insured by the federal government up to a certain amount. However, because the returns are generally very low, it is possible for inflation to outpace the return. Likewise, U.S. government securities are backed by the full faith and credit of the U.S. government but it is also possible for the rate of inflation to exceed the returns.

Municipal Securities: Municipal securities, while generally thought of as safe, can have significant risks associated with them including, but not limited to: the credit worthiness of the governmental entity that issues the bond; the stability of the revenue stream that is used to pay the interest to the bondholders; when the bond is due to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same amount of interest or yield to maturity.

Bonds: Corporate debt securities (or "bonds") are typically safer investments than equity securities, but their risk can also vary widely based on: the financial health of the issuer; the risk that the issuer might default; when the bond is set to mature; and, whether or not the bond can be "called" prior to maturity. When a bond is called, it may not be possible to replace it with a bond of equal character paying the same rate of return.

Stocks: There are numerous ways of measuring the risk of equity securities (also known simply as "equities" or "stock"). In very broad terms, the value of a stock depends on the financial health of the company issuing it. However, stock prices can be affected by many other factors including, but not limited to the class of stock (for example, preferred or common); the health of the market sector of the issuing company; and, the overall health of the economy. In general, larger, better established companies ("large cap") tend to be safer than smaller start-up companies ("small cap") are but the mere size of an issuer is not, by itself, an indicator of the safety of the investment.

Mutual Funds and Exchange Traded Funds: Mutual funds and exchange traded funds ("ETF") are professionally managed collective investment systems that pool money from many investors and invest in stocks, bonds, short-term money market instruments, other mutual funds, other securities, or any combination thereof. The fund will have a manager that trades the fund's investments in accordance with the fund's investment objective. While mutual funds and ETFs generally provide diversification, risks can be significantly increased if the fund is concentrated in

a particular sector of the market, primarily invests in small cap or speculative companies, uses leverage (i.e., borrows money) to a significant degree, or concentrates in a particular type of security (i.e., equities) rather than balancing the fund with different types of securities. ETFs differ from mutual funds since they can be bought and sold throughout the day like stock and their price can fluctuate throughout the day. The returns on mutual funds and ETFs can be reduced by the costs to manage the funds. Also, while some mutual funds are "no load" and charge no fee to buy into, or sell out of, the fund, other types of mutual funds do charge such fees which can also reduce returns. Mutual funds can also be "closed end" or "open end". So-called "open end" mutual funds continue to allow in new investors indefinitely whereas "closed end" funds have a fixed number of shares to sell which can limit their availability to new investors.

ETFs may have tracking error risks. For example, the ETF investment adviser may not be able to cause the ETF's performance to match that of its Underlying Index or other benchmark, which may negatively affect the ETF's performance. In addition, for leveraged and inverse ETFs that seek to track the performance of their Underlying Indices or benchmarks on a daily basis, mathematical compounding may prevent the ETF from correlating with performance of its benchmark. In addition, an ETF may not have investment exposure to all of the securities included in its Underlying Index, or its weighting of investment exposure to such securities may vary from that of the Underlying Index. Some ETFs may invest in securities or financial instruments that are not included in the Underlying Index, but which are expected to yield similar performance.

Commercial Paper: Commercial paper ("CP") is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default. There is a less risk in asset-based commercial paper ("ABCP"). The difference between ABCP and CP is that instead of being an unsecured promissory note representing an obligation of the issuing company, ABCP is backed by securities. Therefore, the perceived quality of the ABCP depends on the underlying securities.

Options Contracts: Options are complex securities that involve risks and are not suitable for everyone. Option trading can be speculative in nature and carry substantial risk of loss. It is generally recommended that you only invest in options with risk capital. An option is a contract that gives the buyer the right, but not the obligation, to buy or sell an underlying asset at a specific price on or before a certain date (the "expiration date"). The two types of options are calls and puts:

A call gives the holder the right to buy an asset at a certain price within a specific period of time. Calls are similar to having a long position on a stock. Buyers of calls hope that the stock will increase substantially before the option expires.

A put gives the holder the right to sell an asset at a certain price within a specific period of time. Puts are very similar to having a short position on a stock. Buyers of puts hope that the price of the stock will fall before the option expires.

Selling options is more complicated and can be even riskier.

The option trading risks pertaining to options buyers are:

- Risk of losing your entire investment in a relatively short period of time.
- The risk of losing your entire investment increases if, as expiration nears, the stock is below the strike price of the call (for a call option) or if the stock is higher than the strike price of the put (for a put option).

- European style options which do not have secondary markets on which to sell the options prior to expiration can only realize its value upon expiration.
- Specific exercise provisions of a specific option contract may create risks.
- Regulatory agencies may impose exercise restrictions, which stops you from realizing value. The option trading risks pertaining to options sellers are:
- Options sold may be exercised at any time before expiration.
- Covered Call traders forgo the right to profit when the underlying stock rises above the strike price of the call options sold and continues to risk a loss due to a decline in the underlying stock.
- Writers of Naked Calls risk unlimited losses if the underlying stock rises.
- Writers of Naked Puts risk unlimited losses if the underlying stock drops.
- Writers of naked positions run margin risks if the position goes into significant losses. Such risks may include liquidation by the broker.
- Writers of call options could lose more money than a short seller of that stock could on the same rise on that underlying stock. This is an example of how the leverage in options can work against the option trader.
- Writers of Naked Calls are obligated to deliver shares of the underlying stock if those call options are exercised.
- Call options can be exercised outside of market hours such that effective remedy actions cannot be performed by the writer of those options.
- Writers of stock options are obligated under the options that they sold even if a trading market is not available or that they are unable to perform a closing transaction.
- The value of the underlying stock may surge or ditch unexpectedly, leading to automatic exercises.

Other option trading risks are:

- The complexity of some option strategies is a significant risk on its own.
- Option trading exchanges or markets and option contracts themselves are open to changes at all times.
- Options markets have the right to halt the trading of any options, thus preventing investors from realizing value.
- Risk of erroneous reporting of exercise value.
- If an options brokerage firm goes insolvent, investors trading through that firm may be affected.
- Internationally traded options have special risks due to timing across borders.

Risks that are not specific to options trading include market risk, sector risk and individual stock risk. Option trading risks are closely related to stock risks, as stock options are a derivative of stocks.

Item 9 Disciplinary Information

Registered investment advisers are required to disclose all material facts of any legal or disciplinary events that would be material to a client's evaluation of our advisory business or the integrity of our management. We do not have any disciplinary events to report under this item.

Item 10 Other Financial Industry Activities and Affiliations

Compensation for the Sale of Securities or Other Investment Products

Certain Associated Persons of our firm may be licensed as independent insurance agents. These persons will earn commission-based compensation for selling insurance products. Insurance commissions earned are separate and in addition to advisory fees you pay to Epic Wealth Management for investment advisory services. In order to protect client interests, Epic Wealth Management's policy is to disclose all forms of compensation before any such transaction is executed. You are under no obligation, contractually or otherwise, to purchase insurance products through Associated Persons of our firm. Refer to *Item 5 - Fees and Compensation* for additional disclosures on this topic.

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

Description of Our Code of Ethics

We strive to comply with applicable laws and regulations governing our practices. Therefore, our Code of Ethics ("Code") includes guidelines for professional standards of conduct for persons associated with our firm. Our goal is to protect your interests at all times and to demonstrate our commitment to our fiduciary duties of honesty, good faith, and fair dealing with you. Under the Code's Professional Standards, Epic Wealth Management expects its associated persons to put the interests of its clients first, ahead of personal interests. In this regard, associated persons are not to take inappropriate advantage of their positions in relation to Epic Wealth Management's clients. The Code also includes written policies reasonably designed to prevent the misuse or dissemination of material, non-public information about you or your account holdings by persons associated with our firm.

All persons associated with our firm are expected to adhere strictly to these guidelines. Persons associated with our firm are also required to report any violations of our Code of Ethics. Clients or prospective clients may obtain a copy of our Code of Ethics by contacting us using the contact information on the cover page of this brochure.

Participation or Interest in Client Transactions

Neither our firm nor any persons associated with our firm has any material financial interest in client transactions beyond the provision of investment advisory services as disclosed in this brochure.

Personal Trading Practices

Our firm or persons associated with our firm may buy or sell the same securities that we recommend to you or securities in which you are already invested. A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. Under its Code, Epic Wealth Management has adopted procedures designed to reduce or eliminate conflicts of interest that this could potentially cause. The Code's personal trading policies include procedures for limitations on personal securities transactions of associated persons, including generally disallowing trading by an associated person in any security before any client account trades or considers trading the same security and the creation of a restricted securities list, reporting and review of personal trading activities and pre-clearance of certain types of personal trading activities. These policies are designed to discourage and prohibit personal trading that would disadvantage clients. If, after reviewing an associated person's personal trading activities, Epic Wealth Management determines that a particular transaction violated Epic Wealth Management's policies, Epic Wealth Management may

require that the associated person reverse, cancel or freeze such transaction.

Block Trading

Our firm or persons associated with our firm may buy or sell securities for you at the same time we or persons associated with our firm buy or sell such securities for our own account. We may also combine our orders to purchase securities with your orders to purchase securities ("block trading"). Refer to *Item 12 - Brokerage Practices* for information on our block trading practices.

A conflict of interest exists in such cases because we have the ability to trade ahead of you and potentially receive more favorable prices than you will receive. To eliminate this conflict of interest, it is our policy that neither our firm nor persons associated with our firm shall have priority over your account in the purchase or sale of securities.

Item 12 Brokerage Practices

Your assets must be maintained in an account at a "qualified custodian," generally a broker-dealer or bank. In recognition of the value of the services the custodian provides, you may pay higher commissions and/or trading costs than those that may be available elsewhere.

When given discretion to select the brokerage firm that will execute orders in client accounts, Epic Wealth Management seeks "best execution" for client trades, which is a combination of a number of factors, including, without limitation:

- Capability to buy and sell securities for your account itself or to facilitate such services.
- The likelihood that your trades will be executed.
- Availability of investment research and tools.
- Overall quality of services.
- Services provided.
- Competitiveness of price.
- Reputation, financial strength, and stability.
- Existing relationship with our firm and our other clients.

Therefore, Epic Wealth Management may use or recommend the use of brokers who do not charge the lowest available commission in the recognition of research and securities transaction services, or quality of execution. Research services received with transactions may include proprietary or third party research (or any combination), and may be used in servicing any or all of our clients. Therefore, research services received may not be used for the account for which the particular transaction was effected.

Epic Wealth Management may recommend that clients establish brokerage accounts with Raymond James & Associates, Inc., a member of New York Stock Exchange /SIPC, to maintain custody of clients' assets. The Adviser may effect trades for client accounts at Raymond James, or may in some instances, consistent with our duty of best execution and specific investment advisory agreement with each client, elect to execute trades elsewhere. Although Epic Wealth Management may recommend that clients establish accounts at Raymond James, it is ultimately the client's decision where to custody assets. The Adviser is independently owned and operated and is not affiliated with Raymond James.

Raymond James is not obligated to execute any transaction that would violate state or federal law or regulation of any self-regulatory organization of which Raymond James is a member. Raymond James may designate certain investments that cannot be held in a client's account.

Research and Other Soft Dollar Benefits

We do not have any soft dollar arrangements.

Economic Benefits

The Adviser participates in the Raymond James service program. While there is no direct link between the investment advice Epic Wealth Management provides and participation in the Raymond James program, we receive certain economic benefits from the Raymond James program. Raymond James enables Epic Wealth Management to access many mutual funds and ETFs without transaction charges and other securities at nominal transaction charges. The commissions and/or transaction fees charged by Raymond James may be higher or lower than those charged by other Financial Institutions. Also, as set forth in the custodial agreement between the client and Raymond James, Raymond James' fee includes all execution charges except (1) certain dealer mark-ups and odd-lot differentials, transfer taxes, exchange fees mandated by the Securities and Exchange Act of 1934 and any other charges imposed by law with regard to transactions in the account, (2) offering concessions and related fees for purchases of money market mutual funds and other public offerings of securities as more fully disclosed in the prospectus; and (3) certain legal transfer fees. Clients may also incur charges for other account services provided by Raymond James not directly related to the execution and clearing of transactions including, but not limited to, IRA custodial fees, safekeeping fees, interest charges on margin loans, and fees for transfers of securities.

Other benefits Raymond James may provide include software and other technology that provides access to client account data (such as trade confirmations and account statements), facilitates trade execution (and allocation of aggregated orders for multiple client accounts), provides research, pricing information and other market data, facilitates the payment of Epic Wealth Management's fees from its clients' accounts, and assists with back-office functions, recordkeeping and client reporting. Many of these services may be used to service all or a substantial number of Epic Wealth Management's accounts, including accounts not held at Raymond James.

Brokerage for Client Referrals

We do not receive client referrals from broker-dealers in exchange for cash or other compensation, such as brokerage services or research.

Directed Brokerage

We routinely require that you direct our firm to execute transactions through Raymond James. As such, we may be unable to achieve the most favorable execution of your transactions and you may pay higher brokerage commissions than you might otherwise pay through another broker-dealer that offers the same types of services. Not all advisers require their clients to direct brokerage.

Block Trades

We combine multiple orders for shares of the same securities purchased for discretionary advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. Generally, non-wrap accounts will pay a fixed transaction cost regardless of the number of shares transacted. In certain cases, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs on any given day. If you participate in our wrap fee program described above, you will not pay any portion of the transaction costs in addition to the program fee. In the event an order is only partially filled, the shares will be allocated to participating accounts in a fair and equitable manner, typically in proportion to the size of each client's order. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

We do not block trade for non-discretionary accounts. Accordingly, non-discretionary accounts may pay different costs than discretionary accounts pay. If you enter into non-discretionary arrangements with our firm, we may not be able to buy and sell the same quantities of securities for you and you may pay higher commissions, fees, and/or transaction costs than clients who enter into discretionary arrangements with our firm.

Item 13 Review of Accounts

Epic Wealth Management will monitor your accounts on an ongoing basis and will conduct periodic account reviews to ensure the advisory services provided to you are consistent with your investment needs and objectives. Additional reviews may be conducted based on various circumstances, including, but not limited to:

- contributions and withdrawals,
- year-end tax planning,
- market moving events,
- security specific events, and/or,
- changes in your risk/return objectives.

One of Epic Wealth Management's investment adviser representatives or principals is responsible for reviewing all accounts.

We will not provide you with regular written reports. You will receive trade confirmations and monthly or quarterly statements from your account custodian(s).

Item 14 Client Referrals and Other Compensation

As noted above, we may receive some benefits from Raymond James based on the amount of client assets held at Raymond James. Refer to *Item 12 - Brokerage Practices* for more information. However, neither Raymond James nor any other party is paid to refer clients to Epic Wealth Management.

As disclosed under *Item 5 - Fees and Compensation*, persons providing investment advice on behalf of our firm are licensed insurance agents. For information on the conflicts of interest this presents, and how we address these conflicts, refer to *Item 5 - Fees and Compensation*.

Item 15 Custody

As paying agent for our firm, your independent custodian will directly debit your account(s) for the payment of our advisory fees unless other arrangements are made. This ability to deduct our advisory fees from your accounts causes our firm to exercise limited custody over your funds or securities. We do not have physical custody of any of your funds and/or securities. Your funds and securities will be held with a bank, broker-dealer, or other qualified custodian. You will receive account statements from the qualified custodian(s) holding your funds and securities at least quarterly. The account statements from your custodian(s) will indicate the amount of our advisory fees deducted from your account(s) each billing period. Clients are advised to review this information carefully, and to notify Epic Wealth Management of any questions or concerns. Clients are also asked to promptly notify Epic Wealth Management if the custodian fails to provide statements on each account held.

Item 16 Investment Discretion

As described in *Item 4 - Advisory Business*, Epic Wealth Management will accept clients on either a discretionary or non-discretionary basis. For discretionary accounts, a Limited Power of Attorney ("LPOA") is executed by the client, giving Epic Wealth Management the authority to carry out various activities in the account, generally including the following: (i) trade execution; (ii) the ability to request checks on behalf of the client; and (iii) the withdrawal of advisory fees directly from the account. Epic Wealth Management then directs investment of the client's portfolio using its discretionary authority. We do not permit clients to impose any restrictions on a grant of discretionary authority, except the client may limit the terms of the LPOA to the extent necessary to comply with the requirements of the client's custodian. Refer to *Item 4 - Advisory Business* for more information on our discretionary management services.

For non-discretionary accounts, the client may also execute an LPOA, which allows Epic Wealth Management to carry out trade recommendations and approved actions in the portfolio. However, in accordance with the investment advisory agreement between Epic Wealth Management and the client, we do not implement trading recommendations or other actions in the account unless and until the client has approved the recommendation or action. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis. Clients may limit the terms of the LPOA, subject to the investment advisory agreement with the client and the requirements of the client's custodian.

Item 17 Voting Client Securities

We will not vote proxies on behalf of your advisory accounts. At your request, we may offer you advice regarding corporate actions and the exercise of your proxy voting rights; however, we generally do not research particular proxy proposals. If you own shares of applicable securities, you are responsible for exercising your right to vote as a shareholder.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward any electronic solicitations to vote proxies.

Item 18 Financial Information

Our firm does not have any financial condition or impairment that would prevent us from meeting our contractual commitments to you. However, the firm received a Paycheck Protection Plan Loan through the SBA in conjunction with the relief afforded from the CARES [Act]. The firm used the PPP to continue payroll and the firm did not suffer any interruption of service. We do not take physical custody of client funds or securities, or serve as trustee or signatory for client accounts, and, we do not require the prepayment of more than \$1,200 in fees per client six or more months in advance. Therefore, we are not required to include a financial statement with this brochure.

We have not filed a bankruptcy petition at any time in the past ten years.

Item 19 Requirements for State-Registered Advisers

We are a federally registered investment adviser; therefore, we are not required to respond to this item.

Item 20 Additional Information

Trade Errors

In the event a trading error occurs in your account, our policy is to restore your account to the position it should have been in had the trading error not occurred. Depending on the circumstances, corrective actions may include canceling the trade, adjusting an allocation, and/or reimbursing the account.

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.