Epic Trust Investment Advisors, LLC

FIRM BROCHURE
(FORM ADV - PART 2A)

JULY 1, 2020

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This Firm Brochure provides information about the qualifications and business practices of Epic Trust Investment Advisors, LLC. Please contact Jeffery P. Lewis at (509) 591-0014 with questions about the contents of this Brochure. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Epic Trust Investment Advisors, LLC (hereinafter referred to as ("Adviser") is a Registered Investment Advisor. Registration of an investment adviser does not imply a particular level of skill or training. Oral and written adviser communications should be used to evaluate an adviser for client suitability.

Additional information about Adviser is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for Epic Trust Investment Adviser is **281027**.

2. Material Changes

We have the following material change to report since our firm's last annual update on March 30, 2019. In September 2019, our firm switched from registration with the U.S. Securities and Exchange Commission to a State Registered Investment Adviser.

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4. ADVISORY BUSINESS

A. OWNERSHIP/ADVISORY HISTORY

Epic Trust Investment Advisors, LLC ("Adviser") is a Washington Limited Liability Company formed on June 14th, 2014. At the time of formation, Jeffery P. Lewis, the Adviser's sole owner and managing member, used the firm as his trade name while was registered as an investment adviser representative with Retirement Wealth Advisors, LLC. On October 16, 2015, the Advisor became registered as an investment adviser in the State of Washington and Mr. Lewis resigned from Retirement Wealth Advisors, LLC. Since October 16, 2015, the Adviser has only conducted investment advisory activity. The firm does not perform any services related to that of a trust company. Additional information about Mr. Lewis can be found under Item 19 of this brochure and in Supplemental Brochure, Form ADV - Part 2B.

B. ADVISORY SERVICES OFFERED

Adviser offers complimentary consultations for prospective clients to discuss available services prior to establishing an advisory relationship. Investment advisory services begin only after a prospective client and Adviser execute an agreement. Adviser offers the following services:

i. FINANCIAL PLANNING

Adviser offers three types of financial planning services. These include:

Core Planning Services:

Adviser's Core Planning Services covers income planning, social security planning, retirement planning and pension plan review. Over the course of a three meetings Adviser reviews the client's current financial situation and then compares it to other scenarios using Monte Carlo Method software. The monte Carlo Method projects the likelihood of achieving one's financial or retirement goals and whether a retiree will have enough income to live on for life, given a wide range of outcomes in the markets. The service's goal is to assist the client with his/her financial decision-making process.

Consulting Services:

Adviser offers Consulting Services on a project basis. The services could cover a single topic or multiple topics. The topics could be financial and cash management, risk management, financial issues relating to divorce or death of a family member, tax issues, retirement planning, educational funding, goal setting, or other needs identified by the client or by Adviser's review of the client's financial circumstances. Depending on the services selected Adviser may present the client with a written analysis.

PLEASE NOTE: When we provide financial planning services and the client implements the financial plan through one of our representatives, the representative will receive compensation in the form of a commission or fee. This creates a conflict of interest between the representative and the client. Therefore, when providing financial planning services, we would like clients to note: (a) a conflict exists between the representative's interests and the interests of the client, (b) the client is under no obligation to act upon the recommendation, and (c) if the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through the representative.

ii. <u>PORTFOLIO MANAGEMENT SERVICES</u>

Epic recommends two primary investments strategies;

1) Traffic Light Asset Allocation Portfolio Management System

   The Traffic Light Portfolio Management System uses a Broad Market Monthly Allocation model and is based on an asset allocation strategy. When deciding on the asset allocation for a client, Adviser takes into account the client's risk tolerance, goals, investment objectives and other data gathered during client meetings. Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets among various asset classes according to an individual's risk tolerance, goals, investment objectives, and other data. The asset classes typically include equities, fixed income, and cash and equivalents. Each class has different levels of risk and return, so each will behave differently over time.

2) Individual Stock Allocation Strategy

   The Individual Stock Allocation Strategy uses a more focused approach to investing with an equal-weighted portfolio between 3 to 4 different screening methodologies to determine the mix and selection of securities. The security selection universe will be focused on a number of different strategies and market caps including but not limited to;

   Large/Mid/Small Cap Value or Growth
   Domestic and International
   Stock Buybacks
   Seasonal Hedging Strategies
   And others…

   The goal of using individual equities is to tilt a portion of a client's portfolio towards a potential to outperform their benchmark indexes using security selection as opposed to only using broad market index-based ETF's or Mutual Funds.

   As with most long-term investment strategies, both Investment Allocation models that Epic recommends are designed to purchase securities with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. The risk associated with using a long-term purchase strategy is that it generally assumes the financial markets will go up in the long-term, which may not be the case. There is also the risk that the segment of the market that the client is invested in or perhaps just that client's 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.

In addition to the above portfolios, clients may add an option overlay strategy as a risk management tool to be used in conjunction with their desired portfolio.

3) Options Overlay Strategy

The options overlay strategy is used in two ways;

1) The portfolio manager may purchase call options in accounts after liquidating long equity or ETF holdings to provide an equity replacement vehicle during normal market conditions or in times of extreme volatility and financial market stress in an effort to limit downside losses to client's principle balance.

2) The portfolio manager may purchase put options in accounts to provide downside protection in periods of heightened market stress.

Either non-tax sensitive or tax sensitive accounts may have Put or Call options purchased in their accounts at the discretion of the portfolio manager depending on several factors. Some of these factors may include depth and duration of the current market drawdown, nature of the market environment stress, technical analysis of broad market indexes, and other factors.

C. CUSTOMIZED SERVICES

Adviser's services are customized to each client. Clients may place restrictions on securities held in accounts. All restrictions must be presented in writing.

D. WRAP PROGRAM

Advisor does not offer a Wrap Program.

E. ASSETS MANAGED

As of January 31, 2020, the firm manages approximately $78,005,790 in client assets on a discretionary basis. We currently do not manage any client assets on a non-discretionary basis.

5. FEES AND COMPENSATION

A. FINANCIAL PLANNING

i. CORE PLANNING SERVICES

Adviser's Core Planning Services are offered on a fixed fee basis that range from $1,000 to $2,500. The fee range is based on the firm's hourly rate ($150) multiplied by the number of hours required to create the plan. The exact fee is provided in the financial planning agreement. An initial deposit of $500 is required when signing the agreement. The balance is due upon completion of the plan. Clients cannot choose to be billed for fees due.

ii. CONSULTING SERVICES

Adviser's Consulting Services are provided at hourly rate of $150. Adviser requires a minimum engagement of one hour. Financial planning fees vary based upon type of services provided, and are set forth in Adviser's financial planning agreement. The fee will be due upon presentation of the financial plan.

Advisor may waive a portion of all of the fee if the client utilizes Advisor's Recommendation of investment management services.

B. Portfolio Management Services

Adviser charges an annual management fee based on a percentage of assets under management for portfolio management services. The annual management fee for each portfolio is:

Portfolio/Service	**Standard Annualized Management Fee Range**
Traffic Light Asset Allocation Portfolio Management System	1.2% to 1.5 %
Individual Stock Allocation Strategy	1.35 to 1.65 %
Options Overlay Strategy	0.25 %

The management fee is calculated and collected monthly in arrears. The management fee is based on the custodian reported average daily account balance each month. In addition to the management fee, the client will be charged a $5 monthly account maintenance fee to cover the cost of accounting and compliance for each account. The monthly per account fee may be waived at the Adviser's discretion. The management fee is negotiable based on the size of the account.

Fees are calculated based on the following formula; Net liquidation value of assets held in the Account as reported by the account custodian as of the end of the billing period * 1/12 * Annual Fee. i.e. $100,000 * 1/12 * 1.5% = $125.

The client will be asked to authorize Adviser with the ability to deduct fees directly from the client's account. This authorization will be to deduct the management fee only. Some states consider the ability to withdraw the management fee a limited form of custody even though the Adviser does not take physical custody of client assets or securities. Adviser will send a billing statement (invoice) to the client and the client's custodian that indicates the fee to be withdrawn, amount on which it is based, how it was calculated, and the time period covered. A client may terminate the Adviser's ability to deduct its fee by notifying the Adviser at the address or telephone number shown on each billing invoice or by notifying the client's custodian.

Adviser's management fee does not include ticket charges, transaction fees, or other related costs and expenses that are normally incurred by the clients. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive, of and in addition to, our fee and we will not receive any portion of these commissions, fees, and costs. For more information about Adviser's brokerage practice please see Item 12.A.

Clients have the option to purchase investment products that the Adviser recommends through other brokers or agents that are not affiliated with it.

C. Termination of Services

Clients may terminate any service for any reason without penalty within five (5) business days after entering an agreement with Adviser. Thereafter, agreements may be terminated at any time by giving ten (10) days written notice. To cancel an agreement, a client must notify Adviser in writing to 8656 W. Gage Blvd, Suite 104, Kennewick, WA 99336. Financial Planning: Upon receipt of written notice of termination, the client will receive a prorated refund of any unearned fees based on the percentage of work completed on the financial plan. Portfolio Management: As portfolio management services are billed in arrears, cancellation will not result in a refund.

Comparable Services Disclosure

Clients should note that lower fees for comparable services may be available from other sources.

Neither Adviser nor its representatives receive any additional compensation.

Other Securities Compensation

As established in Item 10.D – Other Industry Affiliations, earning commissions for the sale of insurance products creates a conflict of interest for the firm. The commissions give a financial incentive to recommend and sell you the insurance products. We attempt to mitigate the conflict of interest to the best of our ability by placing your interests ahead of our own and through the implementation of policies and procedures that address the conflict.

6. Performance-Based Fees and Side by Side Management

Adviser does not charge performance-based fees (fees based on a share of account gains and/or appreciation) or provide side-by-side management. Accordingly, no information is reportable for this Item.

7. Types of Clients

Adviser offers services to individuals and high-net-worth individuals. The services cover a variety of account types such as, trusts, estates and IRAs. Adviser's minimum household account size is $50,000. Adviser may waive its minimum requirement at its discretion.

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

A. Methods of Analysis and Investment Strategies

Portfolio Management Services:

The Traffic Light Portfolio Management System uses a Broad Market Monthly Allocation model and is based on an asset allocation strategy. When deciding on the asset allocation for a client, Adviser takes into account the client's risk tolerance, goals, investment objectives and other data gathered during client meetings. Asset allocation is an investment strategy that aims to balance risk and reward by apportioning a portfolio's assets among various asset classes according to an individual's risk tolerance, goals, investment objectives, and other data. The asset classes typically include equities, fixed income, and cash and equivalents. Each class has different levels of risk and return, so each will behave differently over time.

With the Traffic Light/Broad Market Monthly Allocation models, Adviser purchases securities with the expectation that the value of those securities will grow over a relatively long period of time, generally greater than one year. The risk associated with using a long-term purchase strategy is that it generally assumes the financial markets will go up in the long-term, which may not be the case. There is also the risk that the segment of the market that the client is invested in or perhaps just that client's 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.

B. <u>RECOMMENDED SECURITIES AND INVESTMENT RISKS</u>

Adviser uses various securities in client accounts including, but not limited to, exchange traded funds and notes, mutual funds, unit investment trusts, common and preferred stocks, convertible securities, bonds (including government, municipal and corporate), money market funds and cash or cash equivalents.

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

Adviser strives to render its best judgment on behalf of its clients. Still, Adviser cannot assure or guarantee clients that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment adviser but is not a reliable predictor of future performance. Adviser continuously strives to provide outstanding long-term investment performance, but many economic and market variables beyond its control can affect the performance of an investment portfolio.

An investment could lose money over short or even long periods. A client should expect his/her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. A client's account performance could be hurt by:

Interest Rate Risk: Interest rate risk is the chance that an unexpected change in interest rates will negatively affect the value of an investment. For example, the possibility of a reduction in the value of a security, especially a bond, resulting from a rise in 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, and regulatory and financial reporting standards, that differ from those of the U.S.

Investment style Risk. Different investment styles tend to shift in and out of favor, depending on market conditions and investor sentiment. Growth stocks tend to be more volatile than value stocks and their prices usually fluctuate more dramatically than the overall stock market. A stock with growth characteristics can have sharp price declines due to decreases in current or expected earnings and may lack dividends that can help cushion its share price in a declining market.

Liquidity Risk: Liquidity risk exist when particular investments are difficult to purchase or sell, possibly preventing the ability to sell such illiquid securities at an advantageous time or price, or possibly requiring the client to dispose of other investments at unfavorable times or prices in order to satisfy its obligations

Mutual Fund Manager Risk: The chance that the proportions allocated to the various mutual funds will cause the client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.

Natural Risks: The chance that a natural catastrophe (earthquakes, hurricanes, etc.) may affect stock prices of domestic or international stocks.

Political Risk: The chance that a change in government may affect stock prices of domestic or international stocks.

Portfolio Concentration: Accounts that are not diversified among a wide range of types of securities, countries or industry sectors may have more volatility and are considered to have more risk than accounts that are invested in a greater number of securities because changes in the value of a single security may have more of a significant effect, either negative or positive. Accordingly, portfolios are subject to more rapid changes in value than would be the case if the client maintained a more diversified portfolio.

Principal Risk: There is no guarantee that a stock will go up in value. A stock's price fluctuates, which means a client could lose money by investing in an equity security.

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.

Terrorism Risk: The chance that stock domestic and international stock prices will decline due to a terrorist event.

9. Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding legal or disciplinary events within the past ten years. These disclosures may affect your evaluation of the Adviser or the integrity of its management. Adviser has not been subject to any administrative, civil, criminal or regulatory proceedings.

10. Other Financial Industry Activities and Affiliations

A. Broker-Dealer Affiliations

Adviser is not affiliated with a broker-dealer.

B. FUTURES/COMMODITIES FIRM AFFILIATION

Adviser is not affiliated with a futures or commodities broker.

C. OTHER INDUSTRY AFFILIATIONS

Adviser's principal, Jeffery Lewis, owns an independent Fixed Annuity and Life Insurance Agency. When the client's individual situation or risk tolerance requires the use of fixed insurance products to solve for their needs, Advisor's Representative may recommend these services to clients. In lieu of charging a fee for these services, Advisor's Representative may be compensated directly by the insurance company. In certain circumstances, this may be considered a conflict of interest as the Representative has a financial incentive to recommend and sell insurance products to clients to help them meet their goals.

Prior to any client presentation to purchase an insurance product, each recommendation is reviewed by Adviser's management team in an effort to confirm that the intended outcome that the Client desires is likely to be achieved by the use of such products. Through Adviser's professional fiduciary duty to clients, and by informing clients they are not obligated to purchase the insurance products recommended, Adviser attempts to mitigate possible conflicts of interest.

D. SELECTION AND MONITORING OF THIRD-PARTY INVESTMENT ADVISERS

Adviser does not recommend third party investment advisers.

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION

Adviser's Code of Ethics establishes ideals for ethical conduct based on fundamental principles of transparency, integrity, honesty, and trust. Adviser provides a copy of its Code of Ethics to clients or prospective clients upon request.

Adviser's Code of Ethics covers all supervised persons and prescribes its high standard of business conduct. The Code of Ethics includes provisions relating to confidentiality of client information, prohibition on insider trading and rumor mongering, restrictions on the acceptance of significant gifts, reporting of certain gifts and business entertainment items, personal securities trading procedures, and other matters. Each of Adviser's supervised persons must acknowledge its Code of Ethics annually, or as amended.

B. MATERIAL INTEREST IN SECURITIES

Adviser does not have a material interest in any securities.

C. INVESTING IN OR RECOMMENDING THE SAME SECURITIES

Adviser's owner and investment adviser representatives do not buy or sell for their own accounts the same securities that are recommend to clients. Records of all associates' personal trading activities are kept, reviewed by our principals, and available to regulators to review on the premises.

12. Brokerage Practices

A. Recommended brokerage

Adviser participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment advisers services which include custody of securities, trade execution, clearance and settlement of transactions. Adviser receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 14 below.)

i. Research and Soft Dollar Benefits

"Soft dollars" are defined as a form of payment investment firms can use to pay for goods and services such as news subscriptions or research. When an investment firm gives its business to a particular brokerage firm, the brokerage firm in return can agree to use some of its revenue to pay for these types of services. Adviser receives some benefits from TD Ameritrade that are disclosed under Item 14 below.

ii. Brokerage for Client Referrals

Adviser does not receive client referrals or any other incentive from any custodian or any third party.

iii. Directed Brokerage

Some clients may direct Adviser to a specific broker-dealer to execute securities transactions for their accounts. When so directed, Adviser may not be able to effectively negotiate lower brokerage commissions or achieve best execution on clients' transactions. This can result in substantially higher fees, charges or dealer concessions in one or more transactions for the clients' account because the Adviser cannot negotiate favorable prices.

B. Trade Aggregation

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

13. Review of Accounts

A. Periodic Reviews

Adviser's Investment Adviser Representatives meet with clients for account reviews on an annual basis. Financial planning reviews are only conducted at the client's request.

B. Other Reviews

Additional reviews are conducted periodically depending on market and economic conditions, or by changes in a client's financial situation. In the latter case, it's the Client's responsibility to inform Advisor of their changing circumstances in a timely fashion if advice is desired.

C. Account Reporting

Portfolio management clients receive account statements from their custodians not less than quarterly and in most cases, statements are available on a monthly basis. Adviser urges clients to carefully review statements and contact Adviser with any questions.

14. Client Referrals and Other Compensation

A. Client Referrals

We do not pay for client referrals or use solicitors.

B. Other Compensation

As disclosed under Item 12, above, Adviser participate in TD Ameritrade's institutional customer program and it may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Adviser's participation in the program and the investment advice it gives to its clients, although it receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving its participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by its related persons. Some of the products and services made available by TD Ameritrade through the program may benefit Adviser but may not benefit its client accounts. These products or services may assist Adviser in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Adviser manage and further develop its business enterprise. The benefits received by Adviser or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Adviser endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Adviser or its related persons in and of itself creates a potential conflict of interest and may indirectly influence its choice of TD Ameritrade for custody and brokerage services.

15. CUSTODY

All client funds, securities and accounts are held at third party custodians. Adviser does not take possession of a client's securities. However, the client will be asked to authorize Adviser with the ability to deduct fees directly from the client's account. This authorization will be to deduct the management fee only. Some states consider the ability to withdraw the management fee a limited form of custody even though the Adviser does not take physical custody of client assets or securities. Adviser will send a billing statement (invoice) to the client and the client's custodian that indicates the fee to be withdrawn, amount on which it is based, how it was calculated, and the time period covered. A client may terminate the Adviser's ability to deduct its fee by notifying the Adviser at the address or telephone number shown on each billing invoice or by notifying the client's custodian. The client's custodian shall also send a quarterly statement indicating the amount of fees withdrawn from the client's Account. Adviser urges clients to carefully review such statements.

16. INVESTMENT DISCRETION

Adviser offers discretionary portfolio management services. Discretion over the client's account is granted when a client signs an investment management agreement. The investment management agreement contains a limited power of attorney that allows Adviser to buy and/or sell selected securities, within the tolerance agreed to by the client, and in the amount it deems suited to the agreed upon portfolio structure. It also allows Adviser to place each such trade without the client's prior approval. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account, and any other investment policies, limitation or restrictions.

Adviser's financial planning services are non-discretionary and confer no investment authority or responsibility to it over any assets of the client regardless of how such assets are held by the client. Throughout the term of the financial planning engagement, the client shall retain full discretion to supervise, manage, and direct the client's assets that may be held by separate arrangement in one or more accounts with Adviser or any affiliated or unaffiliated third party.

17. VOTING CLIENT SECURITIES

In most cases, Adviser is not responsible for proxies of securities held in client accounts except for securities that Adviser has purchased on a discretionary basis across multiple accounts and where the Client did not specifically direct Adviser to purchase the security. Proxy materials received for securities that were NOT purchased for the model portfolios managed by Advisor are sent directly to clients from the account's custodian. Clients should contact Adviser with questions on proxy materials.

18.FINANCIAL INFORMATION

A. BALANCE SHEET

Adviser does not require or solicit prepayment of more than $500 in fees per client, six or more months in advance. Accordingly, Adviser is not required to provide a balance sheet to clients.

B. FINANCIAL CONDITION

Registered investment advisers are required to provide clients with certain financial information or disclosures about Adviser's financial condition. Adviser has no financial obligations that impair its ability to service clients.

C. BANKRUPTCY

Adviser has not been the subject of a bankruptcy proceeding.

19. REQUIREMENTS FOR STATE-REGISTERED ADVISERS

Adviser has one principal executive officer (management person), namely Jeffery P. Lewis, CFP®. Mr. Lewis's biographical information is provided in his respective ADV Part 2B and is available upon request.

Under Other Industry Affiliations (Item 10) above, Mr. Lewis discloses he is a licensed annuity and insurance representative and may receive commissions for the sale of insurance products. He is also owner of Epic Financial Publishing, LLC, a publishing company. These activities and any conflicts of interest associated therewith are discussed in Item 10 and his brochure supplement.

Adviser is required to disclose additional information if it or a management person, receives a performance-based fee, has any relationship or arrangement with an issuer of securities, or was ever found liable in an arbitration, civil, self-regulatory organization or administrative proceeding. Adviser and its management person, Jeffery P. Lewis, do not receive performance-based fees. They do not have a relationship or arrangement with any issuer of securities. Finally, they have not been found liable in an arbitration, civil, self-regulatory organization or administrative proceeding.

Conflicts of Interest Disclosure

Pursuant to California code of Regulations Section 260.238(k), in this Part 2, the firm, its representatives and employees have disclosed all material conflicts of interests that could reasonably be expected to impair the rendering of unbiased and objective advice. The conflicts of interest may include but are not limited to: (a) compensation arrangements connected with advisory services which are in addition to the advisory fees, (b) other financial industry activities or affiliations, or (c) participation of interest in client transactions.

Business Continuity Plan

Adviser has a Disaster Recovery and Business Continuity Plan in place that provides detailed steps to mitigate and recover from the loss of office space, communications, and/or services.

The plan covers natural disasters such as snowstorms, hurricanes, tornadoes, and flooding. The plan also covers man-made disasters such as loss of electrical power, loss of water pressure, fire, bomb threat, nuclear emergency, chemical event, biological event, telephone communications line outage, internet outage, railway accident and aircraft accident. All electronic files and client communications are securely backed up daily and stored on encrypted cloud service providers.

Alternate offices are identified to support ongoing operations in the event the main office is unavailable. The client's custodian may also assist, depending on the type of disaster, with back office and trading assistance for accounts held in custody by them. The client's custodian has its own disaster recovery plans with backup facilities in different parts of the U.S. It is the firm's intention to contact all clients within five days of a disaster that dictates moving its office to an alternate location for a period of time.