

EPIPHANY FINANCIAL COACHING, LLC

FORM ADV 2A CLIENT BROCHURE

This Brochure provides information about the qualifications and business practices of Epiphany Financial Coaching, LLC. If you have any questions about the contents of this Brochure, please contact us (913) 490-4400 or via email to brendon@epiphanykc.com. The information in this Brochure has not been approved or verified by the Office of the Kansas Securities Commissioner or the United States Securities and Exchange Commission (SEC). Registration does not imply a certain level of skill or training. Additional information about Epiphany Financial Coaching is available on the Adviser Search website at www.adviserinfo.sec.gov.

Epiphany Financial Coaching's CRD number is: 307859

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March 23, 2023

Item 1 – Cover page

ITEM 2: MATERIAL CHANGES

Epiphany Financial Coaching, LLC filed this Form ADV 2A Brochure on May 2, 2022 for an update to its annual requirement. Since then, there are material changes including office location, total assets under management (Item 4) and hourly fee charged (Item 5).

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Form ADV 2B Brochures - attached

ITEM 4: ADVISORY BUSINESS

A. DESCRIPTION OF THE ADVISORY FIRM

Epiphany Financial Coaching, LLC (“*Epiphany Financial Coaching*”, “*EFC*” or “*Adviser*”) is a Kansas limited liability company formed in February 2020, and is headquartered in Overland Park, Kansas. EFC is owned by Brendon Jenks.

B. TYPES OF ADVISORY SERVICES

EFC is an independent *fee only* Registered Investment Adviser and offers **Financial Planning, Coaching, Consultation, and Investment Management Services**. EFC also offers general education seminars or workshops, as time permits. EFC does not charge a fee for these events. The term “fee only” means EFC is only compensated in the form of advisory fees. EFC is not a broker/dealer or custodian.

“*Investment Adviser Representatives*” are those persons authorized to deliver financial and investment advisory services on behalf of EFC. Our Investment Adviser Representatives are not registered representatives of any broker/dealer firm and therefore do not accept commissions for securities recommendations.

EFC specializes in coaching clients to discover their true purpose for money and assists with aligning their investment management and spending with that stated purpose. EFC offers ongoing educational/coaching programs in the recognition and elimination of speculative and destructive financial and investment behaviors. Specific activities EFC coaches’ clients to avoid are track record investing, marketing timing and stock picking.

EFC offers an initial, complimentary consultation to discuss the advisory services available; to give a prospective client an opportunity to review services desired; and to determine the possibility of a potential Client-Adviser relationship.

Financial Planning Services

EFC’s investment management clients receive financial planning services which include (as requested by the client throughout EFC’s engagement): tax planning, insurance planning, retirement planning and estate planning. Services may be comprehensive in nature or services can be tailored to address one or more components of financial planning. The requested services may include short-term and/or long-term goal planning as directed by the client. Financial Planning may include consultations and/or written financial plans, which analyze the client’s stated financial situation and provides recommendations and methods for implementation of designed strategies. Initial services and reviews are scheduled as requested by the client. While there is no obligation to utilize the planning services, they are not transferrable and if unused, do not impact the Adviser’s fee.

Financial planning and consultation services are otherwise available on an hourly basis and in such cases, services terminate at the conclusion of services. Consultations may involve issues pertaining to investing, asset allocation, risk management, issues of interest to business owners, etc. The planning or consultation services to be provided and the Adviser’s fee(s) are agreed upon at the time of engagement. Stand-alone financial planning and consultations do not include continuous services, reviews, or investment management. Investment management services are available via a separate client agreement. Clients are otherwise welcome to engage EFC for follow-up or additional services when they determine the need.

When financial planning services or information are limited, clients must understand that comprehensive planning needs and or objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure.

When providing a review or advice on investments within retirement plans, the advice and any recommendations are limited to plan offerings and the service provider(s) selected by the plan providers.

Implementation of any advice or recommendations pertaining to securities or non-securities matters, in whole or in part, is entirely at the client's discretion via the service provider(s) of the client's choice. Clients requiring assistance on issues relating to matters outside of financial and investment advisory topics should consult their personal tax adviser, legal counsel, or other professionals for expert opinions.

Investment Management Services

EFC's non-discretionary investment management services are ongoing in nature and focus on consultations, reviews, and the monitoring of the managed portfolio. Services continue until terminated in writing by either party.

Investment Management Services begin only after the Client and Adviser formalize the relationship with a properly executed client agreement. As a fiduciary to each of its clients, EFC is responsible for gathering an appropriate amount of information pertaining to its clients' financial situation, investment objectives, and any reasonable restrictions imposed (as well as changes thereto). After the formal engagement and depending upon the scope of the engagement, the Adviser and client will share in a data gathering and discovery process to determine the client's current financial situation, stated needs, goals, intentions, anticipated retirement age, time horizons, risk and volatility tolerance, and investment objectives, based upon information provided by the client. EFC and our client will normally complete a risk assessment (the Matson Money MRI report), investment policy statement, or similar documentation, depending upon the scope of services to be provided.

EFC has entered into a service agreement with Matson Money, an unaffiliated investment management platform to utilize among other things, Matson Money's software, advice, and investment management services on a co-advisory basis. This means EFC maintains its role as your investment manager in a co-Adviser capacity while utilizing the investment platform available through Matson Money, an SEC regulated registered investment adviser. Matson Money offers proprietary model portfolios that are not available directly to the public. Each portfolio consists of broadly diversified U.S., international and fixed income mutual funds. To initiate these services, EFC clients execute a tri-party agreement which grants Matson Money limited discretionary authority to implement securities transactions.

Matson Money is responsible for providing discretionary portfolio management (whereby the firm monitors and rebalances portfolios in accordance with the agreed upon investment strategy), best execution, portfolio reporting within their respective program, fee calculation and withdrawals, and other services it agrees to provide within its respective programs as outlined in the tri-party agreement. Within Matson Money, EFC is not permitted to make withdrawals or deposits of funds, establish any sources for funding an account or destinations for withdrawals from an account, and will not have the authority to establish new accounts or place securities transactions on a client's behalf.

EFC is responsible for data-gathering, consultations, coaching on financial and asset management issues, monitoring the managed portfolio on a non-discretionary basis, and ensuring all reported client status changes are promptly reported to Matson Money. EFC will also assist clients should they determine the need to adjust the investment strategy due to the client's reported changes in their financial situation or objectives. EFC will provide ongoing

monitoring of the portfolio in accordance with the directives provided. The underlying portfolio assets will be reviewed internally on a frequent basis (generally daily), the client's portfolio will be internally reviewed no less than quarterly, but reviews may occur more frequently, depending upon the types of investments, market conditions, when the client reports (actual or potential) changes in their financial condition, at the discretion of the Adviser, and in conjunction with significant deposits or withdrawals.

Clients engaging investment advisory services must play an active role. EFC requires its client to participate in the formation of the investment plan, the development of investment advice and recommendations, and the ongoing services provided. Clients may call EFC's office during regular business hours to discuss their portfolio or ask questions, but EFC recommends that clients initiate a meeting with the Adviser no less than annually. *However, clients are obligated to immediately inform the Adviser of any changes in their financial situation to provide the Adviser with the opportunity to review the new data to ensure it the portfolio continues to be structured to help meet the client's stated needs and objectives.*

General Education Workshops or Seminars

EFC also provides coaching, workshops and seminars which focus on general financial and investment education topics.

EFC also provides complimentary newsletters and public videos that focus on general financial and investment matters.

C. CLIENT TAILORED SERVICES AND CLIENT IMPOSED RESTRICTIONS

EFC focuses on providing individualized services. However, where client services or information are limited, clients must understand that comprehensive investment needs and objectives may not be fully considered due to the client's option to receive limited services, the lack of information received, and/or client disclosure. EFC and the client will share in a data gathering and discovery process to determine the client's stated needs, goals, intentions, time horizons, risk tolerance and investment objectives, based upon information provided by the client and the nature of services requested. For investment management services, the client and Adviser will normally complete a risk assessment (the MRI report), investment policy statement, or similar documentation, depending upon the nature of services to be provided. EFC's overall goal is to coach clients to choose investment allocations that may help them to reach their individual hopes, goals, and dreams

Clients determine their investment objectives and most appropriate investment strategy combination through the Questionnaire process but are not otherwise permitted to impose restrictions on their accounts given that the accounts are invested in mutual funds subject to their own inherent investment restrictions as established by each fund's manager.

Clients may desire to place or keep certain assets within client's account(s) that have been / are selected by the client and are not the subject of investment advice by EFC and we refer to these as "self-directed" assets. EFC will not manage this facet of the client's portfolio and the Adviser will therefore have no responsibility to provide consultation, suitability reviews, due diligence research or any other services relating to the self-directed assets in client's account(s).

D. WRAP FEE PROGRAMS

EFC does not manage or sponsor a wrap fee program.

E. AMOUNTS OF ASSETS UNDER MANAGEMENT

As of 03/21/2023, EFC manages \$11,000,000 in total assets; all of which is managed on a non-discretionary basis (use of outside money management service).

ITEM 5: FEES, COMPENSATION AND TERMINATION OF SERVICES

A. FEE SCHEDULES

Financial Planning or Consultation Services

EFC's stand-alone Financial Planning or Consultation Services are invoiced at a rate of \$200 per hour, invoiced at the conclusion of services.

Investment Management Services

EFC requests a \$500 on-boarding fee for new investment management relationships, which includes EFC's financial planning services. One-half of this fee is collected at engagement and the balance is due at the conclusion of the financial planning services. This fee is negotiable and can be waived.

Investment management fees are invoiced quarterly in advance and each quarter's fee is based on the portfolio value on the last market day of the prior quarter, as determined by the client's custodian as set forth in the tri-party management agreement. Each quarter's fee is calculated by multiplying the portfolio value by the annual fee and dividing the sum by 4. A pro-rata fee is calculated for services initiated at any time other than at the beginning of a calendar quarter.

Matson Money is responsible for deducting or invoicing for investment management fees. The client authorizes Matson Money to deduct the management fee from their custodial account(s) on a quarterly basis. EFC receives 100% of the management fee. Please reference Matson Money's ADV 2A Brochure. However, as noted in their ADV 2A Brochure, Matson Money does not charge a separate management fee for assets invested in their related Matson Funds since they are separately compensated as the contracted manager to the funds (generally .50% of the funds' average daily balance).

EFC is compensated for its management services as follows:

<u>Market Value of Managed Portfolio</u>	<u>Annual Fee</u>
Up to \$500,000	.99%
\$500,001 - \$1 million	.50%
\$1,000,001 - \$3 million	.40%
Over \$3 million	.30%

Fees are negotiable, depending upon the scope and complexity of services and at the Adviser's discretion. While EFC believes its fees are competitive, lower fees for comparable services may be available from other sources.

B. PAYMENT OF FEES

Financial Planning and Consultation Services

EFC's stand-alone financial planning and consultation fees are paid directly to EFC. The Adviser's on-boarding fee for management clients receiving planning services is also paid directly to EFC.

Investment Management Services

Matson Money's tri-party agreement with clients and EFC provides authority for Matson Money to directly debit investment management fees from clients' accounts via the qualified custodian holding clients' funds and securities, and to disburse EFC's portion of the fee to EFC. Matson Money is required to follow the required criteria when payment is deducted from the client's account via a qualified custodian, as required by the United States Securities and Exchange Commission and various state regulators as follows: 1) The client provides written authorization permitting the fees to be paid directly from the client's account held by the independent qualified custodian and the authorization is limited to withdrawing contractually agreed upon Investment Adviser fees; (2) The client will directly receive regular (quarterly) reports directly from the qualified custodian which reflect the Adviser's fee deduction; (3) The frequency of fee withdrawal shall be specified in the written authorization/agreement; (4) The custodian of the account shall be advised in writing of the limitation on the Adviser's access to the account and; (5) The client shall be able to terminate the written billing authorization or agreement at any time.

It is important to note that custodial firms do not verify advisory fees. Therefore, clients should review their custodial statements carefully. If a client should have any questions or concerns in connection with an advisory fee deduction, they should promptly contact EFC and/or Matson Money. If at any time during the engagement, the client fails to receive the regular statements produced by the custodian or they have new address information to report, it is important for the client to promptly notify EFC and their custodian.

Clients may terminate any service within 5 days after executing the applicable client agreement and without fees due where EFC's Form ADV 2 Brochures (and Matson Money's ADV 2 Brochures, if applicable to the engagement) were not delivered at least 48 hours prior to engagement. Alternatively, services may be immediately terminated upon receipt of written notice by either party. Item 5.D of this Brochure discusses prepaid fees and refunds.

C. FEES ASSOCIATED WITH INVESTING

Clients are responsible for the payment of all third-party fees associated with investing. Clients pay transaction and brokerage commissions to their broker/dealer or other service providers ("*Financial Institution[s]*") as well as any fees associated with their particular accounts (e.g., account opening, maintenance, transfer, termination, wire transfer, retirement plan, trust fees, and all such applicable third party 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. All fees paid to EFC for advisory services are separate from the fees and expenses charged to shareholders of exchange traded funds (ETFs) or mutual fund shares offered by mutual fund companies. A complete explanation of the expenses charged by a mutual fund or ETF is contained in the respective fund prospectus. Clients are encouraged to read each prospectus and securities offering document. If a mutual fund previously purchased by or selected by a client should impose a sales charge, a client may pay an initial or deferred sales charge. Such charges, fees and commissions are exclusive of and in addition to the Adviser's fees. EFC does not receive any portion of these investment-related fees.

D. PREPAYMENT OF FEES

When EFC's \$500 on-boarding fee applies as outlined in Item 5.A, one-half of this fee is collected at engagement and the balance is due at the conclusion of the financial planning services. If the engagement is terminated prior to the completion of the planning efforts, EFC will apply its \$100 per hour planning fee for services provided and will promptly refund the unused portion to the client. Depending upon the stage of the project, the decision to apply its hourly fee or refund the on-boarding fee in full is at the Adviser's discretion.

Investment Management fees are charged quarterly in advance pursuant to the tri-party agreement clients execute with Matson Money and EFC. Services can be terminated at any time during the engagement and as set forth in the tri-party agreement, Matson Money coordinates the pro-rated refund of unearned adviser and co-adviser fees. This means Matson Money will count back to the effective date of termination to calculate the refund due to the client.

E. OTHER COMPENSATION FOR THE SALE OF SECURITIES OR OTHER INVESTMENT PRODUCTS TO CLIENTS

EFC is a *fee-only* registered investment adviser and only receives compensation in the form of investment advisory fees paid directly by clients. Our investment adviser representatives are not engaged in outside business activities involving the sale of securities or other investment products to clients.

ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

EFC's advisory fees are not "performance based" (based upon a share of capital gains or capital appreciation, or performance, for any portion of funds under an advisory contract). Therefore, EFC does not engage in side-by-side management services.

ITEM 7: TYPES OF CLIENTS AND MINIMUM CONDITIONS

Epiphany Financial Coaching offers investment advisory services to individuals and high net worth individuals, businesses, charities, and small pension clients.

ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

EFC provides personalized financial and investment management services with advice designed to meet varying needs of and within the direction set forth by the investors. EFC seeks to design advice that is best suited to a client's stated unique needs after the client has defined their objectives, risk tolerance, and time horizons and is available to providing ongoing services after a portfolio design is approved and implemented.

Client participation and the client's delivery of accurate and complete information are critical to the Adviser's process. In performing its services, the Adviser is not required to verify any information received from the client or from the client's other professionals (e.g., attorney, accountant, etc.) and is expressly authorized to rely on such information.

EFC recommends the investment management services offered by Matson Money as discussed at Item 4 of this Brochure.

EFC does not perform fundamental, technical, or other type of security analysis. EFC considers investments based on its experience coupled with publicly available research and analysis. EFC takes the position that markets are efficient, markets are the best determinant of price and that consistently predicting market movements and capturing additional rates of return unrelated to risk is not possible for any individual or entity. Based on this belief, EFC selects managers that focus on capturing rates of return, utilize asset class or structured funds, diversify, and eliminate stock picking, track record investing and marketing timing from the investment process. Of course, no method of analysis can guarantee success.

EFC's recommended strategies may be based upon several concepts and determined by the type of investor. Services and recommendations are customized for each individual client. This process attempts to coordinate the client's objectives for risk vs. return with the Adviser's analysis of the macro environment and opportunities available via Matson Money. EFC does not utilize market timing strategies. Investors should generally expect to remain always invested within the ranges of their selected asset allocation plan unless restated by the client. Changing conditions in the client's financial life may warrant a collaborative effort with the client to modify their strategic investment framework, which consequently may also trigger changes to investment holdings within the portfolio.

EFC does not advise on the purchase of "alternative investments" such as commodities, bitcoin, managed futures, private equity, current or hedge funds. Prospective clients holding alternative investments should consider attending EFC's education/coaching programs to see how these investments may conflict with their true purpose for their money.

Portfolio additions may be in cash or securities. The Adviser may consult with its clients about the options and ramifications of transferring securities. However, clients are hereby advised that when transferred securities are liquidated, they are subject to transaction fees, fees assessed at the mutual fund level (e.g., contingent deferred sales charge) and/or tax ramifications.

EFC may recommend the services of itself as Investment Adviser, its Investment Adviser Representatives in their individual capacities as investment managers, and the services of other industry entities to implement recommendations (such as an unaffiliated manager, and unaffiliated brokerage and custodial firms). Clients are welcome but are never under any obligation to act upon any of the recommendations made by the Adviser or to engage the services of any recommended service firm or professional including the Adviser itself. All investors should ensure they appropriately research other service providers before engaging services.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

B. MATERIAL RISKS INVOLVED

Epiphany Financial Coaching takes the position that investors with diverse portfolios have a better chance of capturing market rates of return and that it's impossible to predict the movement of any market or economy without adding risk. No single strategy can be relied upon to *outperform* the market. Epiphany Financial Coaching does not attempt to time the market. The Adviser does not recommend frequent trading. The Adviser does not recommend short sales, margin transactions and options-writing as they are associated with greater risk.

Clients may make additions to and withdrawals from the account at any time, subject to customary securities settlement procedures and the Adviser's right to terminate services (such as when assets dip so low as to make investment management inappropriate for the client). Asset withdrawals may impair the achievement of a client's investment objectives. However, all strategies involve risk and may result in a loss of an investor's original investment. Many of these risks apply equally to stocks, bonds and any other investment or security. Identified material risks associated with the Adviser's investment strategies include:

Market Risk: Market risk involves the possibility that an investment's current market value will decline due to general market decline, thus reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Investment Strategy Risk: This risk exists when an Adviser's strategy may fail to produce the intended results.

Style Risk: The Adviser's strategy may consist of "value" and or "growth" investments. With respect to securities and investments considered undervalued by the Adviser, market prices may not reflect our determination that the security is undervalued, and its price may not increase to what we believe to be its full value and may even decrease in value. With respect to "growth" investments, the underlying earnings or operational growth anticipated may not occur, or the market price of the security may not increase as anticipated.

Defensive Risk: To the extent that the strategy attempts to hedge or take defensive measures such as holding a significant portion of its assets in cash or cash equivalents, the objective may not be achieved.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: Bond prices generally rise when interest rates fall. Fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

As we know from the recent events, the market can be impacted by external events such as pandemic, natural disasters, war, etc.

Clients may choose to make self-directed securities transactions, which are investments that are not reviewed and/or not recommended by the Adviser. In such cases, the Adviser has not passed on the suitability of said investments and while the Adviser may assist with client-directed implementation as a value-added service at the client's request, the Adviser will not manage these types of investments unless agreed in writing.

C. RISKS OF SPECIFIC SECURITIES UTILIZED

EFC generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and / or international equity markets.

It is important to understand that investing in securities involves a risk of loss that a client should be prepared to bear.

ITEM 9: DISCIPLINARY INFORMATION

Registered Investment Advisers are required to disclose legal and disciplinary events that may be material to a *client's* or prospective *client's* evaluation of the Adviser's practice or the integrity of its management. EFC has responded to each item below **(in bold text)**:

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which your firm or a *management person*:

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any *felony*; (b) a *misdemeanor* that *involved* investments or an *investment-related* business, fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses.
2. is the named subject of a pending criminal *proceeding* that involves an *investment-related* business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses.
3. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation; or
4. was the subject of any *order*, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, your firm or a *management person* from engaging in any *investment-related* activity, or from violating any *investment-related* statute, rule, or *order*.

Neither Epiphany Financial Coaching nor its Investment Adviser Representatives have any disclosure information to report for Item 9.A.1., Item 9.A.2, Item 9.A.3, and Item 9.A.4.

B. An administrative *proceeding* before the SEC, any other federal regulatory agency, any state regulatory agency, or any *foreign financial regulatory authority* in which your firm or a *management person*:

1. was *found* to have caused an *investment-related* business to lose its authorization to do business; or
2. was *found* to have been *involved* in a violation of an *investment-related* statute or regulation and was the subject of an *order* by the agency or authority (a) denying, suspending, or revoking the authorization of your firm or a *management person* to act in an *investment-related* business (b) barring or suspending your firm's or a *management person's* association with an *investment related* business (c) otherwise significantly limiting your firm's or a *management person's investment-related* activities; or (d) imposing a civil money penalty of more than \$2,500 on your firm or a *management person*.

Neither Epiphany Financial Coaching nor its Investment Adviser Representatives have any information to report for Items 9.B.1 and 9.B 2(a-d).

C. A self-regulatory organization (SRO) proceeding in which your firm or a management person:

1. was found to have caused an investment-related business to lose its authorization to do business; or 2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

Neither Epiphany Financial Coaching nor its Investment Adviser Representatives have any information to report for Items 9.C.1 and 9.C.2.

Please note: Individual information about EFC's Investment Adviser Representatives is contained in their Form ADV Part 2B Brochures which is attached directly behind this firm Brochure. If you did not receive these Brochures, please contact EFC via the contact information contained on the cover page of this Brochure.

ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. REGISTRATION AS A BROKER/DEALER OR BROKER/DEALER REPRESENTATIVE

EFC is not registered as a broker/dealer and no such registration is pending. EFC is a fee only registered investment adviser. Neither EFC nor its investment adviser representatives accept commissions for securities recommendations.

B. REGISTRATION AS A FUTURES COMMISSION MERCHANT, COMMODITY POOL OPERATOR OR A COMMODITY TRADING ADVISER

Neither EFC nor its Investment Adviser Representatives are registered as a futures commission merchant, commodity pool operator, or a commodity trading adviser and no such registrations are pending.

C. REGISTRATION RELATIONSHIPS MATERIAL TO THIS ADVISORY BUSINESS AND CONFLICTS OF INTEREST

Neither Epiphany Financial Coaching nor its Investment Adviser Representatives have any registration relationships, legal affiliations or any association with the following businesses that would present a possible conflict of interest and no such relationships are pending.

- ❖ broker-dealer, municipal securities dealer, government securities dealer or broker
- ❖ investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- ❖ futures commission merchant, commodity pool operator or trading Adviser
- ❖ banking or thrift institution
- ❖ accountant or accounting firm
- ❖ insurance company or agency
- ❖ pension consultant
- ❖ real estate broker or dealer
- ❖ sponsor or syndicator of limited partnerships.

EFC does not operate and does not have a material relationship with a hedge fund or other type of private pooled investment vehicle.

Brendon Jenks is the owner two affiliated registered investment advisers: Stewardship Wealth Management, LLC and Wealth Renovators, LLC. While these firms offer similar services, they are no longer accepting new clients.

Mr. Jenks has a residential real estate business to handle his personal interest in investment properties. Mr. Jenks does not sell real estate, nor does he or his company manage our client's real estate investments.

D. SELECTION OF OTHER ADVISERS OR MANAGERS AND HOW THIS ADVISER IS COMPENSATED FOR THOSE SELECTIONS

As discussed at Item 4.B, EFC has entered into an agreement with Matson Money to utilize Matson Money's investment management platform and funds. This means EFC maintains a role as co-Adviser while utilizing the investment platform available through Matson Money. The annual investment management services and fee associated with Matson Money's services are outlined in Matson Money's Form ADV 2A and the tri-party service agreement.

**ITEM 11: CODE OF ETHICS, PARTICIPATION
OR INTEREST IN CLIENT TRANSACTIONS
AND PERSONAL TRADING**

A. CODE OF ETHICS

EFC takes the issues of fiduciary duty and regulatory compliance seriously and is committed to maintain compliance with state and applicable federal securities laws. EFC has a position of public trust, and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable.

**ITEM 11: CODE OF ETHICS, PARTICIPATION
OR INTEREST IN CLIENT TRANSACTIONS
AND PERSONAL TRADING**

B. CODE OF ETHICS

EFC takes the issues of fiduciary duty and regulatory compliance seriously and is committed to maintain compliance with state and applicable federal securities laws. EFC has a position of public trust and it is our goal to maintain that trust; provide excellent service, good investment performance; and advice that is suitable.

EFC places great value on ethical conduct. Therefore, the goal of our internal policies is to challenge our staff to live up not only to the letter of the law, but also to the ideals set forth by the Adviser. Clients may be familiar with the roles fiduciaries play in various legal situations and in certain industries. As a Registered Investment Adviser, EFC is a fiduciary to each client. As fiduciaries, Registered Investment Advisers owe their clients several specific duties. According to the SEC (to which state regulators defer on this topic), an Investment Adviser's fiduciary duties include:

- Providing advice that is suitable
- Providing full disclosure of material facts and potential conflicts of interest (such that the client has complete and accurate disclosure to make an informed decision about services of the Adviser and about investment recommendations)
- The utmost and exclusive loyalty and good faith
- Best execution of transactions under the available circumstances
- The Adviser's reasonable care to avoid ever misleading clients
- Only acting in the best interests of clients.

It is EFC's policy to protect the interests of each of our clients and to place clients' interests first and foremost. The Adviser will abide by honest and ethical business practices to include, but not limited to:

- The Adviser will not participate in trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account.
- The Adviser will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the client, and we will document suitability.
- The Adviser and its Investment Adviser Representatives will not borrow money from clients.
- EFC will not recommend the purchase of a security without the reasonable belief that the security is registered, or the security or transaction is exempt from registration in states where we provide investment advice and based upon information the Adviser receives.

- The Adviser will not recommend that a client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of an unlicensed brokerage firm, based upon information available to the Adviser.
- EFC's Members and personnel will report all required personal securities transactions to Brendon Jenks, Chief Compliance Officer as required by securities rules and regulations. Reportable trades for EFC include all *but the following exceptions*:
 - ❖ Transactions effected pursuant to an automatic investment plan
 - ❖ Securities held in accounts over which the access person has no direct or indirect influence or control
 - ❖ Transactions/holdings in direct obligations of the US Government
 - ❖ Money market instruments — bankers' acceptances, bank certificates of deposit, commercial paper, repurchase agreements and other high- quality short-term debt instruments
 - ❖ Shares of money market funds
 - ❖ Transactions and holdings in shares of mutual funds are not reportable, since the Adviser does not have a material relationship with an investment company
 - ❖ Transactions in units of a unit investment trust are not reportable if the UIT is invested exclusively in unaffiliated mutual funds.

All applicable securities rules and regulations will be strictly enforced. EFC will not tolerate and has instituted controls against insider trading. Investment Adviser Representatives and administrative personnel who do not follow the Adviser's Code of Ethics or who in any way violate securities rules and regulations, or who fail to report known or suspected violations will be disciplined or terminated, depending upon severity. Such persons could also face action by the SEC and/or state securities regulators.

Clients are welcome to request a copy of the Adviser's Code of Ethics by contacting the EFC's office. Our contact information is located on the cover page of this Brochure.

C. RECOMMENDATIONS INVOLVING MATERIAL FINANCIAL INTERESTS

EFC does not recommend that clients buy or sell any security in which any of EFC or its related persons have a material financial interest.

D. INVESTING PERSONAL MONIES IN THE SAME SECURITIES AS CLIENTS

EFC and/or individuals associated with EFC may have similar investment goals and objectives and as a result may buy or sell securities for their personal accounts that may be identical to or different from those recommended to clients. Thus, at times the interests of the Adviser's or staff members' accounts may coincide with the interests of clients' accounts. However, at no time will the Adviser or any related persons receive an added benefit or advantage over clients with respect to these transactions nor will the Adviser or its associated persons ever place itself in a position to have added benefit as a result of advice given to clients. The Adviser's Chief Compliance Officer monitors the personal trading activities of advisory personal.

A. TRADING SECURITIES AT / AROUND THE SAME TIME AS CLIENTS

EFC acknowledges its fiduciary responsibility to place the investment needs of clients ahead of the Adviser and its staff. While EFC does not maintain limited discretionary trading authority, the interests of clients are held in the highest regard. EFC and its personnel will not receive an added benefit or advantage over clients with respect to personal or related person transactions. EFC and its personnel are not permitted to place themselves in a position to have added benefit as a result of advice given to clients. The Adviser and its personnel will not buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investing public on reasonable inquiry. EFC has established trading policies for its access persons. The Adviser's Chief Compliance Officer is responsible for the monitoring of personal trading conducted by staff.

ITEM 12: BROKERAGE PRACTICES

A. FACTORS USED TO SELECT CUSTODIANS AND/OR BROKER/DEALERS

EFC is not a broker/dealer or custodian. In order to manage your assets, you will need to place your assets with a qualified custodian. Clients who receive financial planning and/or consulting services without investment management will retain authority to implement recommendations, in whole or in part via the financial services provider(s) of their choice.

EFC recommends the services of AXOS and may also recommend Charles Schwab & Co., Inc. ("Schwab") and Pershing, LLC ("Pershing") for brokerage and custodial services. EFC is independently owned and operated and is not affiliated with any brokerage/custodial firms. You will open an account with your selected custodian by entering into an account agreement directly with them. EFC does not maintain the authority to open the account for you, although we may assist you in doing so. Your selected custodian will hold your assets in a brokerage account and buy and sell securities when instructed.

EFC's recommended unaffiliated money manager, Matson Money also utilizes the above-referenced custodians. If you do not wish to place your assets with AXOS, Schwab, or Pershing, then EFC and Matson Money cannot assist with the management of your account.

Since EFC and Matson Money only utilize the above-named brokerage/custodial firms in conjunction with their services, the firms may be unable to achieve the most favorable execution of client transactions. As a result, our clients may incur higher costs than may otherwise be available through other firms offering similar brokerage and custodial services.

EFC recognizes its duty to recommend brokerage firms that execute securities transactions in such a manner that the clients' total costs or proceeds in each transaction are the most favorable under the circumstances. EFC considers the full range and quality of a brokerage firm's services including, among other things, the value of services provided to clients, execution capability, commission rates, available technology, financial condition, and business reputation. In this light, the determinative factor is not necessarily the lowest possible commission costs but whether the selection offers the best qualitative execution for the managed account. Our selected custodians are large and sophisticated order senders that serve a large majority of independent investment advisers. While it is possible that clients may pay higher fees through our recommended brokerage-custodial firms, EFC has determined it currently offers the best overall value to clients for the service, brokerage and technology provided.

1. RESEARCH AND OTHER SOFT DOLLAR BENEFITS

EFC does not receive research or other soft dollar benefits from its recommended brokerage firm. Receipt of such benefits would present a material conflict of interest between an adviser and its clients. However, EFC does receive service benefits from AXOS, Schwab, and Pershing at no cost, because of utilizing the firms' brokerage and custodial services.

Through the services engaged through Matson Money, EFC may receive service benefits provided by AXOS, Schwab and Pershing which would not be otherwise be available if the Adviser did not give advice to clients. These include access to account data which allows EFC to monitor client accounts, duplicate client confirmations and bundled duplicate statements, the ability to deduct advisory fees from clients' custodial accounts, general research, access to business-related news, and various other non-cash services. Any general research received is used for the benefit of all clients.

In fulfilling its duties to its clients, the Adviser endeavors always to put the interests of its clients first. Our brokerage recommendation is connected to Matson Money's use of these service providers. Clients should be aware, however, that the Adviser's receipt of benefits from a custodian and/or broker-dealer creates a conflict of interest since these benefits may influence the Adviser's choice of broker-dealer over another broker-dealer that does not furnish similar software, systems support, or services. However, the monetary value of products, research and services given if any, is negligible and not a material factor to EFC, which takes the position that they do not impair EFC's independence.

We may have an incentive to recommend that you maintain your account with the recommended service providers, based on our interest in maintaining access to Matson Money's investment management services. While this poses a conflict of interest, we believe, that our selection of Matson Money as an unaffiliated investment manager and the recommended brokerage-custodial firms are in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of services.

2. BROKERAGE FOR CLIENT REFERRALS

EFC does not receive referrals from a broker/dealer or third party in exchange for using that broker/dealer or third party.

3. CLIENTS DIRECTING BROKER/DEALER / CUSTODIAN SELECTIONS

Clients receiving EFC's hourly services are welcome to utilize their preferred service provider and are welcome to implement recommendations in whole or in part, entirely at their discretion. In such cases, the client will negotiate terms and arrangements for their account(s) with their service provider.

EFC does not accept client-directed brokerage in conjunction with its investment management services.

B. AGGREGATION (BLOCK) TRADING FOR MULTIPLE CLIENT ACCOUNTS

EFC does not maintain limited discretion and therefore does not engage in block trading.

ITEM 13: REVIEW OF ACCOUNTS

A. FREQUENCY AND NATURE OF PERIODIC REVIEWS AND WHO CONDUCTS

Hourly or project-based financial planning and/or consultation services do not involve ongoing services or reviews.

EFC's ongoing financial planning services within our investment management services will include the following types of reviews:

- ✓ All clients are invited to attend quarterly coaching/education sessions. We do not initiate quarterly 'check-ins' to assess financial plans.
- ✓ Consultations as may be requested.
- ✓ Year-end review and discussion pertaining to the plan and identify necessary updates based on input from our client
- ✓ An updated financial plan, as the need is determined

Investment Management Services involve frequent monitoring of portfolios and manager performance. Portfolios are reviewed no less than quarterly and underlying securities may be reviewed more frequently. Reviews are performed by EFC's Chief Compliance Officer.

Portfolios are analyzed in relation to the client's stated investment objectives, risk profile, tax situation and market conditions.

Individual client reviews are conducted no less than annually to provide the client with the opportunity to review their profile data and investment strategies. Investment Adviser Representatives conduct periodic client meetings and have frequent telephonic contacts in which investment objectives, market conditions and other factors are discussed with clients.

Clients are welcome to initiate meetings (telephonically, electronically or in person) throughout the year. However, clients are obligated to promptly contact the Adviser when there exists a real or potential change in the clients' financial condition or if a change in strategy may be contemplated. This prompt notification gives the Adviser the opportunity to review the clients' new information and determine if it impacts the advice and recommendations prepared for the client. EFC will ensure that reported material changes in a client's financial and/or investment situation are promptly reported to Matson Money.

B. FACTORS THAT MAY TRIGGER NON-PERIODIC REVIEWS OF ACCOUNTS

Additional reviews may be triggered by material market, economic or political events or in conjunction with significant deposits or withdrawals. Reviews may also occur because of reported changes in the client's financial situation (which may include but are not limited to: Termination of employment, a change in the family dynamic, relocation, inheritance, or retirement).

C. CONTENT AND FREQUENCY OF REGULAR REPORTS PROVIDED

Clients can expect to receive confirmation statements from all transactions and a quarterly statement, directly from their custodial firm. The custodian's quarterly reports detail account value, net change, portfolio holdings, and all account activity.

ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION

A. ECONOMIC BENEFITS PROVIDED BY THIRD PARTIES FOR ADVICE RENDERED TO CLIENTS (INCLUDES SALES AWARDS OR OTHER PRIZES)

EFC does not receive any economic benefit, directly or indirectly from any third party in connection with advisory services provided to its clients.

B. COMPENSATION TO NON-ADVISORY PERSONNEL FOR REFERRALS

EFC does not directly or indirectly compensate non-advisory personnel, other persons, or firms for client referrals.

EFC receives non-economic benefits from Matson Money in the form of the support products and services it makes available to EFC and other independent investment advisors whose clients maintain assets in their investment platform. These products and services, how they benefit us, and the related conflicts of interest are described in Item 12 of this Brochure.

ITEM 15: CUSTODY

In all cases, EFC's clients have a direct and beneficial interest in their securities (individual ownership), rather than an undivided interest in a pool of securities.

EFC does not accept custody of client funds or securities. The Adviser does not directly deduct fees from custodial accounts and does not charge fees of \$500 or more for services to be performed six or more months in advance of services.

Matson Money performs fee calculations and deductions in managed accounts via the qualified custodian and directs EFC's co-Adviser compensation to EFC. Your custodial statements will reflect the deduction of management fees. You should carefully review those statements promptly and contact EFC promptly with any questions or concerns or if you are not receiving your account statements.

ITEM 16: INVESTMENT DISCRETION

EFC does not maintain limited discretionary trading authority to execute securities transactions in client accounts. Clients will grant such authority to Matson Money to receive the investment management services available through their platform.

ITEM 17: VOTING CLIENT SECURITIES (PROXIES)

Clients retain the authority to vote proxies. EFC requests that investors ensure proxy materials are mailed directly to each investor or an authorized third party. EFC will not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies. Clients should discuss proxies and proxy-related questions with their legal counsel or other adviser as EFC is not able to consult on proxies.

ITEM 18: FINANCIAL INFORMATION

A. BALANCE SHEET

EFC does not accept fees for services that involve \$500 or more for services to be performed six or more months in advance. EFC does not maintain custody client funds and securities and therefore is not required to include a balance sheet with this Brochure.

B. FINANCIAL CONDITIONS REASONABLY LIKELY TO IMPAIR THE ADVISER'S ABILITY TO MEET CONTRACTUAL COMMITMENTS TO CLIENTS

Neither EFC nor its management have a financial condition that is reasonably likely to impair the Adviser's ability to meet contractual commitments to clients.

C. BANKRUPTCY PETITIONS IN PREVIOUS TEN YEARS

EFC, its owners, and its investment adviser representatives have never been party to a bankruptcy petition.

**ITEM 19: REQUIREMENTS FOR
STATE REGULATED ADVISERS**

A. Principal executive officers and management persons, formal education, and business background.

For information about EFC's owners, its Investment Adviser Representatives, and its Chief Compliance Officer, please refer to the Form ADV 2B Brochures which accompany this Brochure.

B. Describe any business in which you are actively engaged (other than giving investment advice) and the approximate amount of time spent on that business.

EFC is solely engaged in the business of providing financial planning, coaching, consultation, and investment management services. Please refer to Item 10.C of this Brochure and the accompanying ADV 2B Brochures for information about the outside business activities of EFC's owners and Investment Adviser Representatives.

C. In addition to the description of your fees in response to Item 5 of Part 2A, if you or a supervised person are compensated for advisory services with performance-based fees, explain how these fees will be calculated. Disclose specifically that performance-based compensation may create an incentive for the adviser to recommend an investment that may carry a higher degree of risk to the client.

EFC and its Investment Adviser Representatives do not accept performance-based fees.

D. If you or a management person has been involved in one of the events listed below, disclose all material facts regarding the event.

EFC, its owners, and investment adviser representatives have never been named in any of the following:

1. An award or otherwise being *found* liable in an arbitration claim alleging damages more than \$2,500, *involving* any of the following:

- (a) an investment or an *investment-related* business or activity
- (b) fraud, false statement(s), or omissions
- (c) theft, embezzlement, or other wrongful taking of property
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being *found* liable in a civil, *self-regulatory organization*, or administrative proceeding *involving* any of the following:

- (a) an investment or an *investment-related* business or activity
- (b) fraud, false statement(s), or omissions
- (c) theft, embezzlement, or other wrongful taking of property
- (d) bribery, forgery, counterfeiting, or extortion; or
- (e) dishonest, unfair, or unethical practices.

E. In addition to any relationship or arrangement described in response to Item 10.C. of Part 2A, describe any relationship or arrangement that you or any of your management persons have with any issuer of securities that is not listed in Item 10.C. of Part 2A.

EFC is a **fee-only** and independent Registered Investment Adviser. The Adviser and its Investment Adviser Representatives do not have any relationships or arrangements with any issuers of securities.

Professional Liability Insurance: EFC carries a professional liability insurance policy. Clients or prospective clients can request a copy of the current insurance agreement and EFC will provide a copy within 30 days of the request.

PRIVACY POLICY

EFC is covered under the definition of a “financial institution” as defined by the Federal Gramm-Leach-Bliley Act (the “Act”). The Adviser is therefore subject to Act and the privacy rules established by the office of the Kansas Securities Commissioner and other states where we may do business.

Privacy of nonpublic personal information is an issue that the staff of EFC takes seriously. In compliance with privacy rules, EFC has adopted policies and procedures reasonably designed to safeguard client and consumer records and information.

In its role as Investment Adviser, EFC routinely collects nonpublic personal information from clients and prospective clients. This information generally will include but is not limited to:

- Information provided in applications, forms and other data provided to us either verbally or in writing, and include but are not limited to your name, address, phone number, account information, social security number, assets, employment, income and debt, email address, etc.
- Information about your transactions, accounts, trading activity and parties to transactions; health and beneficiary information (such as may pertain to financial planning issues)
- Information from other outside sources
- Any other data that is deemed to be nonpublic personal information as defined by the Act and state privacy rules.

EFC values our clients' trust and confidence. We will never sell our client's nonpublic personal information.

All information provided by clients or prospective clients to EFC, (including the Adviser's personnel), and information and advice furnished by the Adviser to clients, shall be treated as confidential and shall not be disclosed to unaffiliated third parties, except as directed by clients with written authorization, by application to facilitate the investment advisory services offered by the Adviser via an unaffiliated financial services provider (such as Matson Money and the client's custodial firm or broker/dealer), or as required by any rule, regulation or law to which the Adviser or its staff may be subject.

You may request your financial information be shared with your attorney, CPA, tax preparer, or other service provider via written/email request. Requests may entail a one-time request to provide data or may be a standing order. You are welcome to revoke such authorizations at any time by providing written notice (letter or email) to EFC or the other service provider engaged in sharing your information.

EFC maintains clients records in a controlled environment and records (electronic and otherwise) are only available to EFC's authorized persons who have a need to access client information to deliver advisory services, provide administrative support, or to respond to client requests. The Adviser has made reasonable efforts and conducts periodic tests to ensure that its electronic workstations are secure and hack-proof.

EFC's position on protecting non-public personal information extends beyond the life of the client agreement. Client information is retained in a protected manner for the time required by regulators (five years from the data of last use) and thereafter is safely destroyed via electronic means or via in-house shredding.

Consumers (who are not clients) who provide information during an initial consultation or for other purposes but do not go on to become clients of the Adviser also receive privacy protection. Original information will be promptly returned in person. Alternatively, if nonpublic personal information is contained in copies of documents, notes or some other media, this information will be securely filed for a period of up to one year (depending upon likelihood of engagement) before being shredded in-house.

Clients are encouraged to discuss any questions regarding EFC's privacy policies and procedures with Brendon Jenks, Chief Compliance Officer.

EPIPHANY FINANCIAL COACHING, LLC

FORM ADV 2B BROCHURE INDIVIDUAL DISCLOSURE BROCHURE

**BRENDON JENKS
MEMBER
CHIEF COMPLIANCE OFFICER**

This Brochure provides information about Brendon Jenks and supplements the Epiphany Financial Coaching's Form ADV 2A Brochure. Please contact us via the information listed below if you did not receive our firm's Brochure or if you have any questions about the contents of this supplement.

The information in this Brochure has not been approved or verified by the Office of the Kansas Securities Commissioner or the United States Securities and Exchange Commission ("SEC"). Additional information about Epiphany Financial Coaching and Brendon Jenks is available on the SEC's Adviser Search website at www.adviserinfo.sec.gov.

Brendon Jenks' CRD number is: 5485724

**7500 College Blvd., Ste. 500
Overland Park, KS, 66210
(913) 490-4400
www.epiphanykc.com
brendon@epiphanykc.com**

March 21, 2023

Item 1: Cover Page

**ITEM 2: EDUCATIONAL BACKGROUND
AND BUSINESS EXPERIENCE**

BRENDON H. JENKS
MEMBER AND CHIEF COMPLIANCE OFFICER

Year of Birth: 1968

Examinations, Designations and Certifications:

Series 65: Investment Adviser Law Exam

Post-Secondary Education:

B.A. Business and Public Administration

University of Missouri, Kansas City 1996

Business (10-year history):

Epiphany Financial Coaching, LLC, Overland Park, KS,
Member and Chief Compliance Officer
Registered Investment Adviser 1/2021 - Present

Wealth Renovators, LLC, Overland Park, KS
Member and Chief Compliance Officer
Registered Investment Adviser 1/2009 – Present
Not actively taking new clients

Stewardship Wealth Management, LLC, Overland Park, KS
Member and Chief Compliance Officer
Registered Investment Adviser 8/2014 - Present
Not actively taking new clients

ITEM 3: DISCIPLINARY INFORMATION

Mr. Jenks's registration records do not contain information that would be material to a client's or prospective client's evaluation of Mr. Jenks or the integrity of his practice. Brendon Jenks has never been involved with any of the following matters:

A. A criminal or civil action in a domestic, foreign, or military court of competent jurisdiction in which the supervised person:

1. was convicted of, or pled guilty or nolo contendere ("no contest") to (a) any felony; (b) a misdemeanor that involved investments or an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, or extortion; or (c) a conspiracy to commit any of these offenses
2. is the named subject of a pending criminal proceeding that involves an investment-related business, fraud, false statements, or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses
3. was found to have been involved in a violation of an investment-related statute or regulation; or
4. was the subject of any order, judgment, or decree permanently or temporarily enjoining, or otherwise limiting, the supervised person from engaging in any investment-related activity, or from violating any investment-related statute, rule, or order.

B. An administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency, or any foreign financial regulatory authority in which the supervised person:

1. was found to have caused an investment-related business to lose its authorization to do business; or
2. was found to have been involved in a violation of an investment-related statute or regulation and was the subject of an order by the agency or authority
 - (a) denying, suspending, or revoking the authorization of the supervised person to act in an investment-related business
 - (b) barring or suspending the supervised person's association with an investment-related business
 - (c) otherwise significantly limiting the supervised person's investment-related activities; or
 - (d) imposing a civil money penalty of more than \$2,500 on the supervised person.

- C. A self-regulatory organization (SRO) proceeding in which the supervised person:
1. was found to have caused an investment-related business to lose its authorization to do business; or
 2. was found to have been involved in a violation of the SRO's rules and was: (i) barred or suspended from membership or from association with other members or was expelled from membership; (ii) otherwise significantly limited from investment-related activities; or (iii) fined more than \$2,500.

D. Any other hearing or formal adjudication in which a professional attainment, designation, or license of the supervised person was revoked or suspended because of a violation of rules relating to professional conduct. If the supervised person resigned (or otherwise relinquished the attainment, designation, or license) in anticipation of such a hearing or formal adjudication (and the adviser knows, or should have known, of such resignation or relinquishment), disclose the event.

Disclosure background for investment adviser representatives can be located via the SEC's investment adviser public disclosure search site at: www.adviserinfo.sec.gov.

ITEM 4: OTHER BUSINESS ACTIVITIES

Brendon Jenks is the owner two affiliated registered investment advisers: Stewardship Wealth Management, LLC and Wealth Renovators, LLC. While these firms offer similar services, they are no longer taking new clients. The two practices are separate, distinct and do not share the same clientele, nor refer clients or business to one another. The time spent on these activities may vary throughout the year but at times may involve up to 20% of Mr. Jenks's time.

Mr. Jenks has a residential real estate business to handle his personal interest in an investment property. Mr. Jenks does not sell real estate, nor does he or his company manage our client's real estate investments.

ITEM 5: ADDITIONAL COMPENSATION

Mr. Jenks does not accept commissions or other fees from any other person or firm, either directly or indirectly, in exchange for providing advisory services to EFC clients. As described in Item 4, Mr. Jenks lends his expertise to two affiliated registered investment advisory firms and in exchange for these separate and distinct services, he receives compensation.

ITEM 6: SUPERVISION

As the Member and Chief Compliance Officer, Mr. Jenks supervises all the Adviser's activities. Mr. Jenks takes the issues of fiduciary duty, ethics, and compliance seriously. EFC

maintains regularly updated written policies and procedures and conducts internal compliance and risk management reviews. The Adviser's supervisory system establishes clear lines of authority, accountability, and responsibility. Clients are welcome to contact Mr. Jenks with questions or concerns in connection with the Adviser's services, staff monitoring, confidentiality and data protection, and internal compliance program. Mr. Jenks's contact information is listed on the cover page of ADV Part 2A and ADV 2B.

ITEM 7: ADDITIONAL INFORMATION

In addition to the events listed in Item 3 of this Brochure, Epiphany Financial Coaching and Brendon Jenks have **never** been the subject of any of the following matters and have never been party to a bankruptcy petition.

1. An award or otherwise being found liable in an arbitration claim alleging damages more than \$2,500, involving any of the following:
 - (a) an investment or an investment-related business or activity
 - (b) fraud, false statement(s), or omissions
 - (c) theft, embezzlement, or other wrongful taking of property
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practices.

2. An award or otherwise being found liable in a civil, self-regulatory organization, or administrative proceeding involving any of the following:
 - (a) an investment or an investment-related business or activity
 - (b) fraud, false statement(s), or omissions
 - (c) theft, embezzlement, or other wrongful taking of property
 - (d) bribery, forgery, counterfeiting, or extortion; or
 - (e) dishonest, unfair, or unethical practice

