

Item 1 - Cover Page

**Firm Brochure**  
(Part 2A of Form ADV)



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This brochure provides information about the qualifications and business practices of Provident Wealth Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at: 281-466-4843, or by email at: [info@providentwealthllc.com](mailto:info@providentwealthllc.com). The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Provident Wealth Advisors, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

March 2, 2023

## Item 2: Material Changes

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### Annual Update

The Material Changes section of this brochure will be updated annually when material changes occur since the previous release of the Firm Brochure.

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### Material Changes Since the Last Update

Since our last annual filing on May 18, 2022 we have no material changes to disclose.

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### Full Brochure Available

If you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 281-466-4843 or by email at: [Info@providentwealthllc.com](mailto:Info@providentwealthllc.com).

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## **Item 4: Advisory Business**

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### **Firm Description**

Provident Wealth Advisors, LLC, (“PWA”) was founded in 2011. Daniel C. Goodwin is 100% owner.

PWA provides personalized confidential financial consulting and solicits for third party investment managers to individuals. Advice is provided through consultation with the client and may include: determination of financial objectives, identification of financial problems, cash flow management, insurance review, investment management, education funding, retirement consulting, and estate consulting.

PWA is a fee-based financial consulting firm. The Firm does not sell insurance, stocks, bonds, mutual funds, limited partnerships, or other commissioned products. The Firm’s Managing Member is affiliated with an entity that sells financial insurance products.

Periodic reviews are communicated to provide reminders of the specific courses of action that need to be taken.

Other professionals (e.g., lawyers, accountants, insurance agents, etc.) are engaged directly by the client on an as-needed basis. Conflicts of interest will be disclosed to the client in the unlikely event they should occur.

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### **Types of Advisory Services**

PWA furnishes investment advice through consultations.

On more than an occasional basis, PWA furnishes advice to clients on matters not involving securities, such as financial consulting matters and trust services that often include estate consulting.

#### **FINANCIAL CONSULTING**

If financial consulting services are applicable, the client will compensate PWA on either a flat fee or a fixed fee basis described in detail under “Fees and Compensation” section of this brochure. If you have additional questions, please feel free to ask your representative.

Flat fee planning at PWA is offered at a rate of \$300 per hour. The number of hours spent on financial planning services may vary based upon the scope of work, individual requirements, complexity of planning and other various factors. Flat fee services include: Tax Planning, Income Planning, Asset Protection, Portfolio Analysis, Insurance Planning, Estate Planning, Long Term Care Planning, College Planning, Cash Flow Management, Benefits Consulting, Pension Analysis, Social Security Analysis, Charitable Planning, Stock NUA Analysis, Divorce/QDRO Analysis, and more. Additional services will likely increase the number of hours required for your financial planning needs.

Fixed fee services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, and Insurance, and are based on the Membership Plan outlined below:



## STRATEGIC ADVANCED WEALTH MANAGEMENT

### PRIMARY AIM

Our Primary Aim is to dramatically change and improve the lives of our clients by leading them from fear, doubt and anxiety about their financial future to a life of peace and confidence so that they may live more powerful, intentional lives using their God given talents to enrich the lives of others.

### CORE VALUES

- We honor our fiduciary standards and at all times put our clients needs before our own
- The perspective of the client is the lens through which every decision is viewed in running our business
- Our clients deserve our best effort, attitude and execution every day
- Trust and respect is earned, not given
- We will always do what is right regardless of the cost

- Institutional Portfolio Access
- Access/Discounts CPA's, Legal, Tax
- Accredited Investor Only Portfolio of Private Equity & Private Placements
- Annual Review/ Risk Assessment
- M-F Advisor Access Questions, Recommendations
- Annual 401(k) Analysis/Allocation
- Comprehensive Financial Plan with Updates
- Tax Efficient Income Planning
- Insurance Annual Review
- College Planning
- WealthGuard
- Pension Analysis
- Special Access Family/Loved One's
- Social Security Analysis
- CPA Analysis NUA, Company Stock
- One Hour CPA Advanced Tax Planning
- Long Term Care Planning
- Legacy/Charitable Planning & Analysis
- VIP Access/Seating Private Client Events
- Annual Tax Planning - CPA
- Mortgage/Real Estate Analysis
- Advanced Financial Analysis
- Divorce/QDRO Analysis
- Estate Planning Review
- Exclusive Client Special Events
- Provident Concierge Service Unlimited Calls/Emails/Planning Meetings
- Account Aggregation & Mobile Notifications



**\$99.00 per month**  
**No Charge for portfolios over \$1MM**

281.466.4843 | [www.ProvidentWealthllc.com](http://www.ProvidentWealthllc.com)  
25511 Budde Road, Suite 1002 | The Woodlands, TX 77380

Fee based financial planning and investment advisory services are offered by Provident Wealth Advisors, a Registered Investment Advisor in the State of Texas. Insurance products and services are offered through Goodwin Financial Group. Provident Wealth Advisors, and Goodwin Financial Group are affiliated companies. Provident Wealth Advisors collaborates with independent CPA's, Tax and Real Estate Attorneys, Private lenders and Private Banks, and other third party professionals to provide comprehensive and holistic planning. In some cases our clients may choose to engage the professional services of one of our strategic partners and may incur such associated costs, in addition to Provident's monthly subscription cost. Provident FFCCFO model will not cover the legal and tax professional cost of wills, tax returns, etc.

The client is under no obligation to act upon the investment advisor's recommendation. If the client elects to act on any of the recommendations, the client is under no obligation to effect the transaction through PWA. Financial consultations will be completed and delivered inside of 6 months. Clients may terminate advisory services with 30 days written notice.

PWA does not provide tax and/or legal advice.

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### **Client Tailored Services and Client Imposed Restrictions**

The goals and objectives for each client are documented in our client files. Investment strategies are created that reflect the stated goals and objective. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written client consent.

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### **Wrap Fee Programs**

PWA does not participate in wrap fee programs.

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### **Client Assets under Management**

PWA does not manage client assets. Professional portfolio management is out sourced to institutional investment management firms.

## **Item 5: Fees and Compensation**

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### **Method of Compensation and Fee Schedule**

PWA bases its fees on fixed fees and solicitor fees from third-party money managers. PWA's third-party money management service fees are 0.99% of assets under management. This fee may be negotiable at the sole discretion of PWA.

### FINANCIAL CONSULTING

Financial Consulting fixed fees is based on the following Membership Plan:

- Strategic Advanced Wealth Management Membership \$99.00 per month

Financial Consulting flat fees are offered at a rate of \$300 per hour. The number of hours spent on financial planning services may vary based upon the scope of work, individual requirements, complexity of planning and other various factors. Flat fee services include: Tax Planning, Income Planning, Asset Protection, Portfolio Analysis, Insurance Planning, Estate Planning, Long Term Care Planning, College Planning, Cash Flow Management, Benefits Consulting, Pension Analysis, Social Security Analysis, Charitable Planning, Stock NUA Analysis, Divorce/QDRO Analysis, and more. Additional services will likely increase the number of hours required for your financial planning needs.

Lower fees for these services may be available from other sources. The payment is due at the commencement of the consulting process.

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### **Client Payment of Fees**

Financial consulting fees are due at the commencement of the consulting process.

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### **Additional Client Fees Charged**

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

PWA, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

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### **Duration and Termination**

This Agreement shall become effective on the date written above and shall continue in effect until terminated by either party by giving to the other party thirty (30) days written notice. PWA is entitled to a pro rata share of work completed.

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### **Prepayment of Client Fees**

Financial consulting fees are due in advance.

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### **External Compensation for the Sale of Securities to Clients**

PWA does not receive any external compensation for the sale of securities to clients, nor do any of the investment advisor representatives of PWA.

## **Item 6: Performance-Based Fees**

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### **Sharing of Capital Gains**

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

PWA does not use a performance-based fee structure because of the potential conflict of interest. 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.

## **Item 7: Types of Clients**



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**Description**

PWA provides investment advice to individuals. Client relationships vary in scope and length of service.

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**Account Minimums**

PWA does not require a minimum to open an account.

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

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**Methods of Analysis and Investment Strategies**

Security analysis methods may include fundamental analysis, technical analysis, and cyclical analysis. Investing in securities involves risk of loss that clients should be prepared to bear.

The main sources of information may include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission as well as Morning Star and other reporting services.

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**Investment Strategy and Method of Analysis Material Risks**

The investment strategy for a specific client is based upon the objectives stated by the client during consultations. The client may change these objectives at any time. Each client executes an Investment Policy Statement or Risk Tolerance that documents their objectives and their desired investment strategy.

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**Security Specific Material Risks**

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

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

## **Item 9: Disciplinary Information**

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### **Criminal or Civil Actions**

None. The Firm and its management have not been involved in any criminal or civil action.

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### **Administrative Enforcement Proceedings**

None. The Firm and its management have not been involved in administrative enforcement proceedings.

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### **Self-Regulatory Organization Enforcement Proceedings**

None. The Firm and its management have not been involved in legal or disciplinary events related to past or present investment clients.

## **Item 10: Other Financial Industry Activities and Affiliations**

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### **Broker-Dealer or Representative Registration**

Daniel Goodwin is a registered representative of AAG Capital, Inc., a FINRA-member Broker-Dealer. They may recommend securities products that will pay them a commission through their broker-dealer relationship. When such recommendations or sales are made, a conflict of interest exists as Mr. Goodwin may receive more commissions from the sale of these products than from providing you with advisory services. Mr. Goodwin is also an Investment Advisor Representative of Accurate Wealth Management, LLC. Mr. Goodwin spends approximately 49% of his time in this role. We require that all representatives disclose this conflict of interest when such recommendations are made. We also require representatives to disclose to clients that they may purchase recommended products from other representatives not affiliated with us. Our Code of Ethics requires our representatives do what is in the client's best interests at all times. Our CCO monitors all transactions to ensure that representatives put their clients first, not the commission they may receive. The broker-dealer also monitors all transactions to make certain they are suitable for the client.

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### **Futures or Commodity Registration**

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

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### **Material Relationships Maintained by this Advisory Business and Conflicts of Interest**

Managing Member, Daniel C. Goodwin, has a financial affiliated business as an Insurance Agent (license #1326223). From time to time, he will offer clients advice or products from this activity. Insurance products and services are offered through Goodwin Financial Group, of which Daniel C. Goodwin is 100% owner.

Daniel C. Goodwin works with various real estate syndication sponsors, who are not affiliated with Provident Wealth Advisors, on Delaware Statutory Trusts (DST), Qualified Opportunity Zones (QOZ), Real Estate Investment Trusts (REITS) and other alternative investments. The purpose of these relationships is to assist clients with investment advice. Daniel C. Goodwin will not receive commissions from these companies but Provident Wealth Advisors will receive compensation for those clients who elect to enter into an advisory agreement with Provident Wealth Advisors.

Provident Wealth Advisors does from time to time receive marketing reimbursements and/or marketing assistance from various real estate syndication sponsors for DST's, Alternatives, REITS' Private Equity, Interval funds and/or Qualified Opportunity Zones.

These practices represent potential conflicts of interest because it gives an incentive to recommend products and services based on obtaining new clients. We require that all representatives disclose this conflict of interest when such recommendations are made. Our fiduciary duty to all our advisory clients requires us to do what is in our client's best interest at all times. Our CCO reviews and monitors

our recommendations. Clients have the option to hire any advisor of their choice.

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### **Recommendations or Selections of Other Investment Advisors and Conflicts of Interest**

PWA solicits the services of Third-Party Money Managers to manage client accounts. In such circumstances, PWA receives solicitor fees from the Third-Party Manager. This situation creates a conflict of interest. However, when referring clients to a third-party money manager, the client's best interest will be the main determining factor of PWA. These fees do not include brokerage fees that may be assessed by the custodial broker dealer. Fees for these services are based on a percentage of assets under management not to exceed any limit imposed by any regulatory agency. The final fee schedule is attached to Schedule C in PWA's Client Services Agreement.

Provident Wealth Advisors LLC receives as an incentive from a portion of Brookstone Capital Management's management fees. This produces an economic incentive for us to recommend that you use the services of Brookstone Capital Management. This represents a material conflict of interest. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that Clients may purchase recommended securities from other registered representatives not affiliated with us.

This solicitor relationship is disclosed to the client in each contract between PWA and Third-Party Money Manager. PWA does not charge additional management fees for Third Party managed account services. Client's signature is required to confirm consent for services within Third-Party Investment Agreement. Client's initials are required on PWA's Client Services Agreement to acknowledge receipt of Third Party fee schedule and required documents including ADV2 disclosures.

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

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#### **Code of Ethics Description**

The employees of PWA have committed to a Code of Ethics. The purpose of our Code of Ethics is to ensure that when employees buy or sell securities for their personal account, they do not create actual or potential conflict with our clients. We do not allow any employees to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our clients. Employees do not have access to non-public information regarding any clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund. Employees are not involved in making securities recommendations to clients, and do not have access to such recommendations that are non-public.

The Firm will provide a copy of the Code of Ethics to any client or prospective client upon request.

## **Investment Recommendations Involving a Material Financial Interest and Conflict of Interest**

Neither PWA nor its employees recommend to clients securities in which we have a material financial interest.

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

PWA does not trade for itself or its clients' accounts and therefore there are no conflicts of interest for securities transactions.

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

PWA does not maintain a Firm proprietary trading account and does not have a material financial interest in any securities being recommended and therefore no conflicts of interest exist.

## **Item 12: Brokerage Practices**

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### **Factors Used to Select Broker-Dealers for Client Transactions**

As Daniel Goodwin is a registered representative of AAG Capital, Inc., Daniel Goodwin and representatives of Provident have a financial incentive to recommend the services of AAG Capital, Inc. However, Clients of Provident Wealth Advisors are under no obligation to choose a broker-dealer affiliated with us and may utilize a broker-dealer of the client's choosing. PWA will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. PWA relies on its broker to provide its execution services at the best prices available. Lower fees for comparable services may be available from other sources. Clients pay for any and all custodial fees in addition to the advisory fee charged by PWA.

- Directed Brokerage  
PWA utilizes Third Party Money Managers and therefore it does not take direction from clients as to what broker-dealer to use.
- Best Execution  
Investment advisors who manage or supervise client portfolios on a discretionary basis have a fiduciary obligation of best execution. PWA does not exercise discretion of client accounts.
- Soft Dollar Arrangements  
Provident Wealth Advisors does from time to time receive marketing reimbursements and/or marketing assistance from various real estate syndication sponsors for DST's, Alternatives, REITS' Private Equity, Interval funds and/or Qualified Opportunity Zones.

### **Aggregating Securities Transactions for Client Accounts**

PWA does not trade for its or its clients' accounts and therefore aggregation of securities transactions is not applicable.

## **Item 13: Review of Accounts**

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### **Schedule for Periodic Review of Client Accounts or Financial Consultations and Advisory Persons Involved**

Account reviews are performed annually by Daniel C. Goodwin, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate. Financial consultations are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

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### **Review of Client Accounts on Non-Periodic Basis**

Other conditions that may trigger a review of clients' accounts are changes in the tax laws, new investment information, and changes in a client's own situation.

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### **Content of Client Provided Reports and Frequency**

Clients receive account statements no less than quarterly for managed accounts. Account reports are issued by the Third-Party Money Manager's custodian. Client receives confirmations of each transaction in account from Custodian.

## **Item 14: Client Referrals and Other Compensation**

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### **Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest**

PWA receives compensation for referring clients to Matson Money, Inc., Altruist, Howard Capital Management, Inc. and Brookstone Capital Management. Provident Wealth Advisors LLC receives as an incentive from a portion of Brookstone Capital Management's management fees. This produces an economic incentive for us to recommend that you use the services of Brookstone Capital Management. This represents a material conflict of interest. We require that all IARs disclose this conflict of interest when such recommendations are made. Also, we require IARs to disclose that Clients may purchase recommended securities from other registered representatives not affiliated with us.

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### **Advisory Firm Payments for Client Referrals**

PWA does not compensate for client referrals.

## **Item 15: Custody**

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### **Account Statements**

All assets are held at qualified custodians, which means the custodians provide account statements directly to clients at their address of record at least quarterly. Clients are urged to compare the account statements received directly from their custodians to the performance report statements prepared by the Third-Party Money Managers.

## **Item 16: Investment Discretion**

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### **Discretionary Authority for Trading**

If a client is provided investment advisory services through either of our third-party managers, the third-party manager and PWA will have discretionary authority over the assets in the clients account. If you provide discretion authority, which will be evidenced via the written, discretionary agreement between the client and the Adviser, PWA and the third-party manager. will have the authority to determine the following without your consent:

- Securities to be bought or sold for your account;
- Amount of securities to be bought or sold for your account;
- The selection of Model Managers and whether to terminate a relationship with a Model Manager.

In all cases this discretion is exercised in a manner consistent with your stated investment objectives for your account. Please consult the third-party manager's brochure for additional information.

When active asset management services are provided on a discretionary basis the client will enter into a separate custodial agreement with the custodian. The custodian agreement will include a limited power of attorney to trade in the client's account(s) which authorizes the custodian to take instructions from us regarding all investment decisions for your account.

## **Item 17: Voting Client Securities**

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### **Proxy Votes**

PWA does not vote proxies on securities. Clients are expected to vote their own proxies. The client will receive their proxies directly from the custodian of their account or from a transfer agent.

## **Item 18: Financial Information**

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**Balance Sheet**

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

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**Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients**

PWA has no condition that is reasonably likely to impair our ability to meet contractual commitments to our clients.

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**Bankruptcy Petitions During the Past Ten Years**

Neither PWA nor its management has had any bankruptcy petitions in the last ten years.

**Item 19: Requirements for State Registered Advisors**

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



**Item 1 – Cover Page**

**Supervised Person Brochure**  
(Part 2B of Form ADV)

**Daniel C. Goodwin**



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[www.provident1031.com](http://www.provident1031.com)

This brochure supplement provides information about Daniel C. Goodwin and supplements the Provident Wealth Advisors' brochure. You should have received a copy of that brochure. Please contact Daniel C. Goodwin if you did not receive Provident Wealth Advisors' brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel C. Goodwin is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**March 2, 2023**

## Brochure Supplement (Part 2B of Form ADV) Supervised Person Brochure

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### Item 2: Educational Background and Business Experience

#### Daniel C. Goodwin CRD# 5752768

##### Personal Information:

- Date of birth: 1962

##### Educational Background:

- Sam Houston State University; 1984

##### Business Experience:

- Provident Wealth Advisors, LLC; Managing Member/CCO/IAR; 03/2011 – Present
- AAG Capital, Inc.; Registered Representative; 03/2022- Present
- Accurate Wealth Management, LLC; Registered Representative; 03/2022- Present
- Provident Management LLC; 12/2016 - Present
- Goodwin Financial Realty LLC; 4/2010 - Present
- Goodwin Financial Group, Inc; Owner/Insurance Agent; 3/2005 - Present
- Hometruster Manager; 01/2007 -12/2016

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### Item 3: Disciplinary Information

Criminal or civil action in domestic, foreign or military court. **None**

Administrative proceeding before the SEC or any other federal or state regulatory agency. **None**

Proceeding before a self-regulatory organization (SRO). **None**

Proceeding in which professional attainment, designation or license was revoked or suspended. **None**

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### Item 4: Other Business Activities

Daniel C. Goodwin has a financial industry affiliated business as an insurance agent. Approximately 10% of his time is spent on this activity where he offers clients advice or products. Clients are not required to purchase any products.

Mr. Goodwin is also a registered representative of AAG Capital, Inc. Mr. Goodwin may recommend securities products that will pay him a commission through their broker-dealer relationship. When such recommendations or sales are made, a

conflict of interest exists as Mr. Goodwin may receive more commissions from the sale of these products than from providing you with advisory services.

Mr. Goodwin is also an Investment Advisor Representative of Accurate Wealth Management, LLC. Mr. Goodwin spends approximately 49% of his time in this role. We require that all representatives disclose this conflict of interest when such recommendations are made. We also require representatives to disclose to clients that they may purchase recommended products from other representatives not affiliated with us. Our Code of Ethics requires our representatives do what is in the client's best interests at all times. Our CCO monitors all transactions to ensure that representatives put their clients first, not the commission they may receive. The broker-dealer also monitors all transaction to make certain they are suitable for the client.

These practices represent potential conflicts of interest because it gives an incentive to recommend products and services based on obtaining new clients. This conflict is mitigated by the fact that clients are not required to hire Provident Wealth Advisors, LLC. However we have a fiduciary duty to all our advisory clients to do what is in their best interests and our CCO reviews and monitors our recommendations. Clients have the option to hire any advisor of their choice.

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**Item 5: Additional Compensation**

No Performance Based Fees

Daniel Goodwin may receive compensation for his activities listed above under "Other Business Activities"

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**Item 6: Supervision**

Since Daniel C. Goodwin is the President of PWA, he is responsible for supervision and formulation and monitoring of investment advice offered to clients.

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**Item 7: Requirements for State-Registered Advisors**

Arbitration Claims: **None**

Self-Regulatory Organization or Administrative Proceeding: **None**

Bankruptcy Petition: **None**