

Form ADV Part 2A

Disclosure Brochure



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This brochure provides information about the qualifications and business practices of Provision Asset, LLC. Being registered as a registered investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 972-987-9651. 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 Provision Asset, LLC (CRD #282183) is available on the SEC's website at www.adviserinfo.sec.gov.

FEBRUARY 18, 2025

Item 2: Material Changes

Annual Update

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

Material Changes Since the Last Update

Since the last filing of this brochure on February 11 2024, the brochure has been updated for SEC registration.

Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

Provision Asset, LLC (Provision) was formed in November 2015 and approved as a registered investment advisor in 2016. The principal owner is Casey Short.

Provision is a fee based financial planning and investment management firm. The firm does not sell annuities, insurance, or other commissioned products, but the firm's principals are affiliated with entities that sell insurance products.

Provision does not act as a custodian of client assets.

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 event they should occur.

Types of Advisory Services

ASSET MANAGEMENT

Provision offers discretionary asset management services to advisory Clients. Provision will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize Provision discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the Client, Provision may hire Sub-Advisors to manage all or a portion of the assets in the Client account. Provision has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Provision. Sub-Advisors execute trades on behalf of Provision in Client accounts. Provision will be responsible for the overall direct relationship with the Client. Provision retains the authority to terminate the Sub-Advisor relationship at Provision's discretion.

As part of a Client's overall portfolio, Provision may advise certain qualified Clients to invest in a non-traded REIT (Real Estate Investment Trust). For those Clients investing in REIT's, Provision will discuss their overall financial position in addition to specifically discussing the distributions from the REIT, on an as needed basis. Specifically, Provision will help the Client determine if REIT distribution will be used for income or re-investment.

Each investment comes with its own unique process for liquidity. Investment Advisor Representatives will discuss with the client their liquidity needs well in advance to make sure the client is invested into positions that meet their liquidity needs. Cash, stocks, mutual funds, and ETF's may provide short-term liquidity (i.e. three days to settle trades and seven to 12 days for check processing). Some bonds, interval funds, CD's, bank notes, and some mutual funds may have unique liquidity schedules that take longer. Any investment is only as liquid as the market to purchase it will dictate.

Interval Funds are designed for long-term investors. Unlike many closed-end investment companies, Interval Fund's shares are not listed on any securities exchange and are not publicly traded. There currently is no secondary market for the shares and it is not expected that a secondary market will develop. Limited liquidity is provided to

shareholders through the Interval Fund's quarterly repurchase offers for no more than 5% of the Interval Fund's shares outstanding at net asset value. There is no guarantee that shareholders will be able to sell all of the shares they desire in a quarterly repurchase offer. If this is a concern, discuss this with an Investment Advisor Representative.

FINANCIAL PLANNING AND CONSULTING

If financial planning services are applicable, the client will compensate Provision on a fixed fee basis as described in detail under "Fees and Compensation" section of this brochure. Services include but are not limited to a thorough review of all applicable topics including Wills, Estate Plan/Trusts, Investments, Taxes, and Insurance.

If a conflict of interest exists between the interests of the investment advisor and the interests of the client, 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 Provision. Financial plans will be completed and delivered inside of thirty (30) days. Clients may terminate advisory services with five (5) days written notice.

QUALIFIED PLAN CONSULTING SERVICES

Provision offers qualified plan consulting services to individuals on an hourly fee basis described in detail under the "Fees and Compensation" section of this brochure. Provision will meet with the client for information gathering. Provision will review the investment options available within the plan upon request. Provision will make investment recommendations to the client based on the investment options available and the client's financial objectives. The qualified plan recommendations will be completed and delivered inside of thirty (30) days. Clients may terminate advisory services with five (5) days written notice.

REFERRAL ARRANGEMENTS

Provision utilizes the services of third party money managers to manage client accounts. In such circumstances, Provision receives referral fees from the third party money manager. Provision acts as the liaison between the client and the third party money manager in return for an ongoing portion of the advisory fees charged by the third party money manager. Provision helps the client complete the necessary paperwork of the third party money manager, provides ongoing services to the client, will provide the third party money manager with any changes in client status as provided to Provision by the client and review the quarterly statements provided by the third party money manager. Provision will deliver the Form ADV Part 2, Privacy Notice and Disclosure Statement of the third party money manager. Clients placed with third party money managers will be billed in accordance with the third party money manager's fee schedule which will be disclosed to the client prior to signing an agreement. This is detailed in Item 10 of this brochure.

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.

Wrap Fee Programs

Provision does not sponsor any wrap fee programs.

Client Assets Under Management

Provision has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$100,812,551	\$0	December 31, 2024

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule

ASSET MANAGEMENT

Provision offers discretionary asset management services to advisory Clients. Provision charges an annual advisory fee based on the assets under management. Typically the fees will be as follows:

Provision Dynamic	Annual Fee	Quarterly Fee
All Assets	1.90%	0.475%

Provision Premier	Annual Fee	Quarterly Fee
All Assets	1.65%	0.4125%

Provision Plus	Annual Fee	Quarterly Fee
All Assets	1.55%	0.3875%

Provision Model	Annual Fee	Quarterly Fee
All Assets	1.35%	0.3375%

Provision Alternative	Annual Fee	Quarterly Fee
All Assets	1.00%	0.25%

The annual fee may be negotiable. Accounts within the same household may be combined for a reduced fee. If assets are held in multiple portfolios within the same account, investment selections will be indicated on the Investment Advisory Agreement. Billing will be calculated pro-rata based on the percentage allocated to each portfolio.

Fees are billed quarterly in arrears based on the amount of assets managed as of the close of business on the last business day of each quarter. The fees must be paid within ten (10) days following the conclusion of the calendar quarter in which the account is being billed. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation. Clients may terminate advisory services with thirty (30) days written notice. Provision will be entitled to a pro rata fee for the days service was provided in the final quarter. Client shall be given thirty (30) days prior written notice of any increase in fees. Accounts will be billed a minimum of \$25 per quarter.

Provision may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Provision will enter into Sub-Advisor agreements with other registered investment advisor firms. When using Sub-Advisors, the Client will not pay additional fees. The Sub-Advisors fees are inclusive of the total fee disclosed by Provision. Sub-Advisor directly deducts their portion of the fee separately from Provision.

FINANCIAL PLANNING and CONSULTING

Financial plans are priced according to the degree of complexity associated with the client's situation. Prior to the planning process, the client will be provided an estimated plan fee. The fee is payable 50% at the time of entering the agreement with the balance due upon delivery of the plan. Services are completed and delivered inside of thirty (30) days. Client may cancel within five (5) business days of signing Agreement for a full refund. If the client cancels after five (5) business days, but before the delivery of the plan, the client will either pay any earned fees to Provision for the work completed or client will receive a refund for the unearned fees paid.

FIXED FEES

Financial planning and consulting services are offered on a negotiable flat fee ranging between \$2,500 and \$5,000 based on the complexity of the plan and the client's needs. Fees may be waived or reduced at the discretion of Provision.

HOURLY FEES

Financial planning and consulting services are offered based on an hourly rate of \$225 per hour. Fees may be waived or reduced at the discretion of Provision.

QUALIFIED PLAN CONSULTING SERVICES

Provision offers qualified plan consulting services to individuals for an hourly fee of \$225 based on the complexity of the case for the consultation. The payment of the fee is due upon delivery of the plan and the recommendations. If other services are provided, Provision reserves the right to lower or waive the fee. Services are completed and delivered inside of thirty (30) days dependent upon timely client delivery of required documentation. Client may cancel within five (5) business days of signing Agreement with no obligation. If the client cancels after five (5) business days, Provision is due a pro-rata fee based on the percentage of work completed.

REFERRAL FEES

Provision may at times use the services of third party money managers and receive a referral fee for referring clients. Provision will be paid a portion of the advisory fee paid to the third party money manager. The client will not pay additional advisory fees to the third party money manager for these services. This is detailed in Item 10 of this brochure.

Client Payment of Fees

Fees for financial plans are due 50% at the time of entering the agreement with the balance due upon delivery of the plan.

Fees for qualified plan consulting are payable upon delivery of the recommendations.

Additional Client Fees Charged

While client assets are placed with third party money managers, the custodian may charge transaction fees on purchases or sales of certain mutual funds, equities and exchange-traded funds, or may have additional account fees. These charges may include mutual fund transactions fees, postage and handling and miscellaneous fees (fee levied to recover costs associated with fees assessed by self-regulatory organizations). The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

Client is responsible for miscellaneous account fees that may be charged by the custodian which include but are not limited to: overnight fees, ACH fees, account closure fees,

reorganization fees, check writing fees, etc. All fees paid to Provision for investment advisory services are separate and distinct from the internal expenses charged by ETFs, mutual funds, closed-end funds, and variable annuities.

For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Provision receives 50% of the estimated financial planning and consulting fees in advance.

External Compensation for the Sale of Securities to Clients

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

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

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

Provision does not use a performance-based fee structure because of the 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

Description

Provision generally provides investment advice to individuals, high net worth individuals, investment companies and charitable organizations. Client relationships vary in scope and length of service.

Account Minimums

Provision does not require a minimum to open an account. Some Third Party Money Managers utilized by Provision may have a minimum to open an account on their platform.

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

Methods of Analysis

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. Past performance is not a guarantee of future returns.

Fundamental analysis involves evaluating a stock using real data such as company revenues, earnings, return on equity, and profits margins to determine underlying value and potential growth. Technical analysis involves evaluating securities based on past prices and volume. Cyclical analysis involves analyzing the cycles of the market.

When creating a financial plan, Provision utilizes fundamental analysis to provide review of insurance policies for economic value and income replacement. Technical analysis is used to review mutual funds and individual stocks. The main sources of information include Morningstar, client documents such as tax returns and insurance policies.

In developing a financial plan for a client, Provision's analysis may include cash flow analysis, investment planning, risk management, tax planning and estate planning. Based on the information gathered, a detailed strategy is tailored to the client's specific situation.

The main sources of information include financial newspapers and magazines, annual reports, prospectuses, and filings with the Securities and Exchange Commission.

Investment Strategy

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, Risk Tolerance or similar form that documents their objectives and their desired investment strategy.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Fundamental analysis may involve interest rate risk, market risk, business risk, and financial risk. Risks involved in technical analysis are inflation risk, reinvestment risk, and market risk. Cyclical analysis involves inflation risk, market risk, and currency risk.

Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with SFH:

- *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, interval fund, 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.
- *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.

- *Non-Traded REITs Risk:* Absence of a public market, lack of liquidity, no guarantee of a distribution and no connection between the share of price of the REIT and the net asset value of the REIT until the assets are valued by the Board of Directors.

The risks associated with utilizing Third Party Money Managers (“TPM”) include:

- Manager Risk
 - TPM fails to execute the stated investment strategy
- Business Risk
 - TPM has financial or regulatory problems

The specific risks associated with the portfolios of the TPM’s which is disclosed in the TPM’s Form ADV Part 2.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
 - Sub-Advisor fails to execute the stated investment strategy
- Business Risk
 - Sub-Advisor has financial or regulatory problems
- The specific risks associated with the portfolios of the Sub-Advisor’s which is disclosed in the Sub-Advisor’s Form ADV Part 2.

Item 9: Disciplinary Information

Criminal or Civil Actions

Provision and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Provision and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Provision and its management have not been involved in legal or disciplinary events that are material to a client’s or prospective client’s evaluation of Provision or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Neither Provision nor any of its employees/contractors are registered representatives of a broker-dealer.

Futures or Commodity Registration

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

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Casey L. Short is a licensed insurance agent. From time to time, he will offer clients advice or products from this activity.

This practice represents a conflict of interest because it gives Mr. Short an incentive to recommend products or services based on any compensation received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or financial educator of their choosing.

In addition, Mr. Short is an instructor for the Council of Financial Educators, in which he helps to educate the public on retirement related topics. Less than 5% of his time is spent on this activity.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Provision may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Provision. Sub-Advisors execute all trades on behalf of Provision in Client accounts. Provision will be responsible for the overall direct relationship with the Client. Provision retains the authority to terminate the Sub-Advisor relationship at Provision's discretion.

In addition to the authority granted to Provision, Clients will grant Provision full discretionary authority and authorizes Provision to select and appoint one or more independent investment advisors ("Advisors") to provide investment advisory services to Client without prior consultation with or the prior consent of Client. Such Advisors shall have all of the same authority relating to the management of Client's investment accounts as is granted to Provision in the Agreement. In addition, at Provision's discretion, Provision may grant such Advisors full authority to further delegate such discretionary investment authority to additional Advisors. Provision ensures that before selecting other advisors for Client that the other advisors are properly licensed or registered as an investment advisor.

This practice represents a conflict of interest as Provision may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors. This conflict is mitigated by disclosures, procedures, and by the fact that Provision has a fiduciary duty to place the best interest of the Client first and will adhere to their code of ethics.

Provision utilizes the services of Third Party Money Managers to manage client accounts. In such circumstances, Provision receives referral fees from the Third Party Manager. Provision acts as the liaison between the client and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. Provision is responsible for:

- helping the client complete the necessary paperwork of the TPM;
- providing ongoing services to the client;
- updating the TPM with any changes in client status which is provided to Provision by the client;
- reviewing the quarterly statements provided by the TPM; and

- delivering the Form ADV Part 2, Privacy Notice and Disclosure Statement of the TPM to the client.

Provision has entered into a Referral Agreement with Gradient Investments, LLC ("GI"). GI is a SEC Registered Investment Advisor that provides investment portfolio advice and supervisory services. Prior to selecting other advisors, Provision will ensure the other advisor is properly licensed or registered as an investment advisor.

GI offers an actively managed program of mutual fund and stock portfolios. The fee will be disclosed to the client in the Investment Advisory Agreement and are negotiable. The client's fee for these services will be based on a percentage of assets under management as follows:

Gradient Investments, LLC ("GI") CRD#141726

STRATEGIC PORTFOLIOS			
	Annual Fee	GI	Provision
All Assets	1.80%	0.80%	1.00%

TACTICAL PORTFOLIOS			
	Annual Fee	GI	Provision
All Assets	1.70%	0.70%	1.00%

Traditionally, GI's Tactical Portfolio was billed with a max annual fee of 2.00%. Since GI is the sub-advisor to the Tactical Portfolio and will receive an annual fee of 0.20% from the ETF, GI has reduced its annual fee of the Tactical Portfolio so as not to double dip.

For example, a Client investing \$100,000 in the GI Tactical portfolio prior to November 2022 would pay an annual fee to GI of \$2,000 or $\$100,000 \times 2.00\% = \$2,000$. After November 2022 the same client would pay GI an annual fee of \$1,700 or $\$100,000 \times 1.70\% = \$1,700$ and pay the internal fees of \$200 or $\$100,000 \times 0.20\% = \200 . For a total of $\$1,700 + \$200 = \$1,900$.

ALLOCATION & DEFINED OUTCOME PORTFOLIOS			
	Annual Fee	GI	Provision
All Assets	1.60%	0.60%	1.00%

PRESERVATION PORTFOLIOS			
	Annual Fee	GI	Provision
All Assets	1.00%	0.40%	0.60%

CLIENT DIRECTED ACCOUNTS			
	Annual Fee	GI	Provision
All Assets	\$300	\$300	\$0

For Client Directed Accounts (CDA), GI will assist in the opening, closing and transferring of accounts. GI will not have discretion at any time on these accounts. Client is solely responsible for the assets held within the accounts and their values which could increase or decrease (potential loss of principal). GI will not execute trades in CDA accounts. GI exceptions will be made for withdrawals to client or assets transferred into a GI managed portfolio. GI will also provide performance reporting on these accounts and can furnish

3rd party analysis reports per the client's request. Similar services may be available through other sources for a lower fee.

These are flat fee schedules, the entire portfolio is charged the same asset management fee.

Example:

Portfolio	Calculation	Quarterly Fee
Strategic Portfolio:	$(\$100,000 * 1.80\%) * (91/365)$	\$448.77
Tactical Portfolio:	$(\$100,000 * 1.70\%) * (91/365)$	\$423.87
Allocation & Defined Outcome Portfolio:	$(\$100,000 * 1.60\%) * (91/365) + (\$750,000 * 1.60\%) * (91/365)$	\$398.90
Preservation Portfolio:	$(\$100,000 * 1.0\%) * (91/365)$	\$249.32

Fee Calculation: (Quarter End Value x Annual Fee %) x (Days in Quarter/Days in Year)
+ **\$15 Quarterly Service Fee***

* The \$15 Quarterly Service Fee is the technology fee charged per account or investment strategy for performance and other reporting. This fee is disclosed in our ADV Part 2A (Item 5: Fees and Compensation) and in our Investment Proposal and Contract (Schedule D: Schedule of Fees).

The above fees are negotiable. Fees are assessed quarterly in arrears based on the amount of the assets managed as of the end of the previous quarter. All management fees are withdrawn from the client's account unless otherwise noted. GI will receive written authorization from the client to deduct advisory fees from their account held by a qualified custodian. GI will pay Provision their share of the fees. Provision does not have access to deduct client fees. Clients may terminate their account within five business days of signing the investment advisory agreement with no obligation. For terminations after the initial five business days, GI will be entitled to a pro-rata fee for the days service was provided in the final quarter. GI will pay Provision their portion of the final fee.

Before entering into a Referral Agreement with any third-party money manager, Provision will review the firm's Form ADV Part 2 for any disclosable events as well as inquire into open issues which may impair a money manager from providing services. Prior to referring any clients to third party advisors, Provision will make sure that they are properly registered, or notice filed.

This relationship will be disclosed to the client in each contract between Provision and Third-Party Money Manager. Provision 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 will initial Provision's Investment Advisory Agreement to acknowledge receipt of Third Party Fee Schedule and required documents including Form ADV Part 2 disclosures.

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

Code of Ethics Description

The employees/contractors of Provision have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Provision

employees/contractors and addresses conflicts that may arise. The Code defines acceptable behavior for employees/contractors of Provision. The Code reflects Provision and its supervised persons' responsibility to act in the best interest of their client.

One area the Code addresses is when employees/contractors buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our clients. We do not allow any employees/contractors 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.

Provision's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other employee, officer or director of Provision may recommend any transaction in a security or its derivative to advisory clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Provision's Code is based on the guiding principle that the interests of the client are our top priority. Provision's officers, directors, advisors, and other employees/contractors have a fiduciary duty to our clients and must diligently perform that duty to maintain the complete trust and confidence of our clients. When a conflict arises, it is our obligation to put the client's interests over the interests of either employees/contractors or the company.

The Code applies to "access" persons. "Access" persons are employees/contractors who 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, who are involved in making securities recommendations to clients, or who have access to such recommendations that are non-public.

Provision 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

Provision and its employees/contractors do not recommend to clients securities in which we have a material financial interest.

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

Provision and its employees/contractors may buy or sell securities that are also held by clients. In order to mitigate conflicts of interest such as front running, employees/contractors are required to disclose all reportable securities transactions as well as provide Provision with copies of their brokerage statements.

The Chief Compliance Officer of Provision is Casey Short. He reviews all employee trades each quarter. The personal trading reviews ensure that the personal trading of employees/contractors does not affect the markets and that clients of the firm receive preferential treatment over employee transactions.

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

Provision does maintain a firm proprietary trading account and affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to

mitigate conflicts of interest such as front running, the firm and affiliated persons are required to disclose all reportable securities transactions as well as provide Provision with copies of their brokerage statements.

The Chief Compliance Officer of Provision is Casey Short. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons, or the trading of the firm, does not affect the markets and that Clients of the firm receive preferential treatment over associated persons' transactions.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Provision may recommend the use of a particular broker-dealer or may utilize a broker-dealer of the Client's choosing. Provision will select appropriate brokers based on a number of factors including but not limited to their relatively low transaction fees and reporting ability. Provision 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 Provision.

- *Directed Brokerage*
In circumstances where a Client directs Provision to use a certain broker-dealer, Provision still has a fiduciary duty to its Clients. The following may apply with Directed Brokerage: Provision's inability to negotiate commissions, to obtain volume discounts, there may be a disparity in commission charges among Clients and conflicts of interest arising from brokerage firm referrals.
- *Best Execution*
Investment advisors who manage or supervise Client portfolios have a fiduciary obligation of best execution. The determination of what may constitute best execution and price in the execution of a securities transaction by a broker involves a number of considerations and is subjective. Factors affecting brokerage selection include the overall direct net economic result to the portfolios, the efficiency with which the transaction is effected, the ability to effect the transaction where a large block is involved, the operational facilities of the broker-dealer, the value of an ongoing relationship with such broker and the financial strength and stability of the broker. Provision does not receive any portion of the trading fees.
- *Soft Dollar Arrangements*
Provision does not maintain any soft dollar arrangements.

Aggregating Securities Transactions for Client Accounts

Provision is not authorized to aggregate purchases and sales and other transactions.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by Casey Short, Chief Compliance Officer. Account reviews are performed more frequently when market conditions dictate.

Financial plans and qualified plans are considered complete when recommendations are delivered to the client and a review is done only upon request of client.

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.

Content of Client Provided Reports and Frequency

Clients receive account statements no less than quarterly for managed accounts. Account statements are issued by the custodian. Clients receive confirmations of each transaction in account from the Custodian and an additional statement during any month in which a transaction occurs, upon request.

Under financial planning services and qualified plan consulting services, the client will receive a one-time written plan.

Item 14: Client Referrals and Other Compensation

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

Provision receives a portion of the annual management fees collected by the Third Party Money Managers to whom Provision refers clients. This situation creates a conflict of interest because the firm and/or its Investment Advisor Representative have an incentive to decide what Third Party Money Managers to use because of the higher referral fees to be received by the firm. However, when referring clients to a third party money manager, the client's best interest will be the main determining factor of the firm and its representatives.

As part of a Client's entire portfolio, a portion may be allocated to a REIT from various REIT companies. Provision is not affiliated with any of the REIT companies and Provision provides no services other than referring appropriate Clients to invest. In connection with investing in REITs, Provision may use marketing materials to inform Clients about these investment options with the various companies. Provision may receive marketing support payments in the form of reimbursements for *bona fide*, reasonable marketing expenses incurred in connection with marketing the Shares. The amount of any marketing support payments, if any, shall be determined by the REIT company, in its sole discretion, but in any event, may not be greater than the *bona fide* reasonable expenses incurred by Provision and in no event shall be excessive or lavish, or otherwise call into question the propriety of the payments.

In addition, financial consultants may be eligible for cash and non-cash compensation including bonuses, recognition trips and other benefits. Some of these programs may be financed in whole or in part by unaffiliated third parties, including third party money managers, which may influence some representatives to favor those managers. See the prior sections entitled "Fees and Compensation" and "Other Financial Industry Activities and Affiliations" for more details regarding compensation and conflicts of interests.

The payment of marketing support, or the determination of the amount paid pursuant thereto, if any, shall not be conditioned upon any specific generation requirement or investment in the Shares, nor shall any such payment be made in recognition of prior business generation. This represents a conflict of interest because it gives an incentive to market this investment. The conflict is mitigated by disclosures, procedures, and the

firm's Fiduciary obligation and by the fact that Clients are not required to invest in this product and may invest with another investment advisor of their choosing

Provision's investment advisor representatives may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, training, and business trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to meet this threshold. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first. Clients are not required to purchase any products and have the option to purchase these products through another firm.

Advisory Firm Payments for Client Referrals

Provision does not compensate for client referrals.

Item 15: Custody**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.

Provision is deemed to have constructive custody solely because advisory fees are directly deducted from Clients' account by the custodian on behalf of Provision.

Item 16: Investment Discretion**Discretionary Authority for Trading**

Provision requires discretionary authority to manage securities accounts on behalf of Clients. Provision has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. The client will authorize Provision discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Provision allows Client's to place certain restrictions, as outlined in the Client's Investment Policy Statement or similar document. Such restrictions could include only allowing purchases of socially conscious investments. These restrictions must be provided to Provision in writing.

Provision does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities**Proxy Votes**

Provision does not vote proxies on securities. Clients are expected to vote their own proxies if they so choose. The client will receive their proxies directly from the custodian of their account or from a transfer agent, upon a written request to the custodian. When

assistance on voting proxies is requested, Provision will provide recommendations to the client. If a conflict of interest exists, it will be disclosed to the client.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided because Provision does not serve as a custodian for client funds or securities, and Provision does not require prepayment of fees of more than \$1200 per client and six months or more in advance.

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

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

Bankruptcy Petitions During the Past Ten Years

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

Item 1 Cover Page

Supervised Person Brochure

Form ADV Part 2B

Casey Luke Short



Provision Asset, LLC

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[casey.short@
provisionretirement.com](mailto:casey.short@provisionretirement.com)

This brochure supplement provides information about Casey Luke Short and supplements the Provision Asset, LLC's brochure. You should have received a copy of that brochure. Please contact Casey Luke Short if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Casey Luke Short (CRD #6436752) is available on the SEC's website at www.adviserinfo.sec.gov.

FEBRUARY 18, 2025

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer and Management Persons - Casey Luke Short

- Year of birth: 1976
-

Item 2 Educational Background and Business Experience

Educational Background:

- Southern Nazarene University; Bachelor of Science-Finance; 2001

Business Experience:

- Council of Financial Educators; Instructor; 02/2019 - Present
 - Provision Asset, LLC; Managing Member/Investment Advisor Representative; 01/2016 - Present
 - Provision Retirement, LLC; Owner/CEO/Insurance Agent; 05/2013 – Present
 - Gradient Advisors, LLC; Investment Advisor Representative; 01/2015 – 01/2016
 - 5Q Communications; Consultant; 08/2012 – 12/2015
-

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities Engaged In

Casey L. Short holds and maintains a Texas insurance license and represents several insurance companies (Insurance License #1828187). Approximately 50% of Mr. Short's time is spent in this practice. From time to time, he may offer clients insurance products and advice.

This practice represents a conflict of interest because it gives Mr. Short an incentive to recommend products or services based on any compensation received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or financial educator of their choosing.

In addition, Mr. Short is an instructor for the Council of Financial Educators, in which he helps to educate the public on retirement related topics. Less than 5% of his time is spent on this activity.

Item 5 Additional Compensation

Mr. Short receives compensation on the insurance he writes but does not receive any performance-based fees. He also receives compensation as a consultant.

Casey L. Short may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, and business trainings and trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to

meet this threshold. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first. Clients are not required to use Gradient Investments, LLC or any of its affiliated companies.

Item 6 Supervision

Casey Short is the sole owner and investment adviser representative of Provision Asset, LLC; therefore he is solely responsible for all supervision and formulation and monitoring of investment advice offered to clients. He adheres to the policies and procedures as outlined in the firm's Compliance Manual.

Item 1 Cover Page

Supervised Person Brochure

Form ADV Part 2B

Anthony Steven Rizzo, CFP®



Provision Asset, LLC

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This brochure supplement provides information about Anthony S. Rizzo and supplements the Provision Asset, LLC's brochure. You should have received a copy of that brochure. Please contact Anthony S. Rizzo if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Anthony S. Rizzo (CRD#6438477) is available on the SEC's website at www.adviserinfo.sec.gov

MARCH 26, 2025

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Additional Investment Advisor Representative

Anthony Steven Rizzo

- Year of birth: 1983
-

Item 2 Educational Background and Business Experience

Educational Background:

- Western Governors University; Bachelor Degree – Science; 2016
- South Puget Sound Community College; Associate Degree - Science; 2014

Professional Certifications

Anthony Steven Rizzo has earned certifications and credentials that are required to be explained in further detail.

The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients.

To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of*

Professional Conduct, to maintain competence and keep up with developments in the financial planning field; and

- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients. CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Business Experience:

- Provision Retirement, LLC; President; 01/2025 - Present
- Council of Financial Educators; Instructor; 02/2019 - Present
- Provision Asset, LLC; Investment Advisor Representative; 04/2016 - Present
- Anthony S. Rizzo – Sole Proprietor; Independent Insurance Agent; 09/2014 – Present
- Baylor Medical Center; RN; 10/2016 – 04/2018
- Texas Health Resources; RN; 10/2014 – 02/2017
- Gradient Advisors, LLC; Investment Advisor Representative; 01/2015 – 01/2016
- South Puget Sound Community College; Student; 05/2011 – 10/2014

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities Engaged In

Anthony Rizzo holds and maintains a Texas insurance license (Insurance License #1946157). Approximately 50% of Mr. Rizzo's time is spent in this practice. From time to time, he may offer clients insurance products and advice.

This practice represent a conflict of interest because it gives Mr. Rizzo an incentive to recommend products or services based on any compensation received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or financial educator of their choosing.

In addition, Mr. Rizzo is an instructor for the Council of Financial Educators, in which he helps to educate the public on retirement related topics. Less than 5% of his time is spent on this activity.

Item 5 Additional Compensation

Mr. Rizzo receives compensation on the insurance he writes but does not receive any performance based fees.

Anthony Rizzo may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, and business trainings

and trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to meet this threshold. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first. Clients are not required to use Gradient Investments, LLC or any of its affiliated companies.

Item 6 Supervision

Anthony Rizzo is supervised by Casey Short, Chief Compliance Officer. Mr. Short reviews Anthony's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Mr. Short can be contacted:

By telephone: 972-987-9651

By email: casey.short@provisionretirement.com.

Item 1 Cover Page

Supervised Person brochure

Form ADV Part 2B

Jay David Beerley



Provision Asset, LLC

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www.ProvisionAsset.com
jay.beerley@provisionretirement.com

This brochure supplement provides information about Jay D. Beerley and supplements the Provision Asset, LLC's brochure. You should have received a copy of that brochure. Please contact Jay D. Beerley if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jay D. Beerley (CRD#6613158) is available on the SEC's website at www.adviserinfo.sec.gov.

MARCH 26, 2025

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Additional Investment Advisor Representative

Jay David Beerley

- Year of birth: 1977
-

Item 2 Educational Background and Business Experience

Educational Background:

- East Texas Baptist University; Bachelor of Arts – Religion, Speech/Communications; 2000

Business Experience:

- Provision Asset, LLC; President; 01/2025 - Present
 - Provision Asset, LLC; Investment Advisor Representative; 02/2016 - Present
 - Jay D. Beerley – Sole Proprietor; Independent Insurance Agent; 01/2016 – Present
 - Cross Fellowship Church; Pastor; 09/2015 – Present
 - Provision Asset, LLC; Administrative Personnel; 08/2015 – Present
 - Beerley Consultants, LLC; Consulting; 11/2018 - Present
 - GracePoint Church; Pastor; 03/2013 – 09/2015
 - East Side Baptist Church; Pastor; 11/2010 – 03/2013
 - FBC Wake Village; Pastor; 03/2007 – 11/2010
 - FBC Joelton; Pastor; 06/2005 – 03/2007
-

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities Engaged In

Jay Beerley holds and maintains a Texas insurance license (Insurance License#2059687). Approximately 50% of Mr. Beerley's time is spent in this practice. From time to time, he may offer clients insurance products and advice.

This practice represents a conflict of interest because it gives Mr. Beerley an incentive to recommend products based on any compensation received by an insurance firm. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Additionally, Mr. Beerley receives compensation as a church pastor for Cross Fellowship Church. Through the church Mr. Beerley provides typical services associated with being a pastor of a church. There is no conflict of interest as advisory clients of Provision Asset are not solicited services for Cross Fellowship Church.

Item 5 Additional Compensation

Mr. Beerley receives compensation on the insurance he writes, but does not receive any performance based fees.

Jay Beerley may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, and business trainings and trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to meet this threshold. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first. Clients are not required to use Gradient Investments, LLC or any of its affiliated companies.

Item 6 Supervision

Jay Beerley is supervised by Casey Short, Chief Compliance Officer. He reviews Jay's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Mr. Short can be contacted:

By telephone: 972-987-9651

By email: casey.short@provisionretirement.com.

Item 1 Cover Page

Supervised Person Brochure

Form ADV Part 2B

Jonathan David McEntire “David”



Provision Asset, LLC

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david.mcentire@provisionretirement.com

This brochure supplement provides information about Jonathan David McEntire and supplements the Provision Asset, LLC's brochure. You should have received a copy of that brochure. Please contact Jonathan David McEntire if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Jonathan David McEntire (CRD#7204802) is available on the SEC's website at www.adviserinfo.sec.gov

MARCH 26, 2025

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Additional Investment Advisor Representative

Jonathan David McEntire (David)

- Year of birth: 1986
-

Item 2 Educational Background and Business Experience

Educational Background:

- University of North Texas; Bachelor of Arts and Science in Radio, Television and Film; 2008

Business Experience:

- Provision Asset, LLC; Investment Advisor Representative; 11/2019 - Present
 - David McEntire – Sole Proprietor; Insurance Agent; 03/2019 – Present
 - Hilton Hotels; Banquet Manager; 02/2019 – Present
 - Per Ardua Financial Solutions; Consulting; 12/2019 - Present
 - Omni Hotels and Resorts; Director of Banquets; 05/2017 - 02/2019
 - Highland Dallas Hotel; Banquet Manager; 02/2016 – 05/2017
 - Four Seasons Resort and Club; Banquet Manager; 04/2007 – 01/2016
-

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities Engaged In

David McEntire holds and maintains a Texas insurance license (Insurance License #1348651). Approximately 20% of David McEntire's time is spent in this practice. From time to time, he may offer clients insurance products and advice.

This practice represents a conflict of interest because it gives David McEntire an incentive to recommend products based on any compensation received by an insurance firm. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 5 Additional Compensation

David McEntire receives compensation on the insurance he writes but does not receive any performance based fees.

Mr. McEntire may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, and business trainings and trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to meet this threshold. This conflict is mitigated by disclosures, procedures and the firm's

fiduciary obligation to place the best interest of the Client first. Clients are not required to use Gradient Investments, LLC or any of its affiliated companies.

Item 6 Supervision

David McEntire is supervised by Casey Short, Chief Compliance Officer. Mr. Short reviews David McEntire's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Mr. Short can be contacted:

By telephone: 972-987-9651

By email: casey.short@provisionretirement.com.

Item 1 Cover Page

Supervised Person Brochure

Form ADV Part 2B

Daniel M. Thomas



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[dan.thomas@
provisionretirement.com](mailto:dan.thomas@provisionretirement.com)

This brochure supplement provides information about Daniel M. Thomas and supplements the Provision Asset, LLC's brochure. You should have received a copy of that brochure. Please contact Daniel M. Thomas if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Daniel M. Thomas (CRD #7686978) is available on the SEC's website at www.adviserinfo.sec.gov

MARCH 26, 2025

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Daniel M. Thomas

- Year of birth: 1976
-

Item 2 Educational Background and Business Experience

Educational Background:

- Oklahoma State University; Bachelor of Arts-Journalism; 2001

Business Experience:

- Provision Asset, LLC; Investment Advisor Representative; 01/2023 - Present
 - In Focus Consulting LLC; Owner/Insurance Agent; 07/2022 - Present
 - iVantage LLC; Owner; 05/2016 – Present
 - KXII-TV; News Anchor; 10/2014 – 10/2021
 - KOCO-TV; News Anchor/Reporter; 10/2010 – 10/2014
-

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities Engaged In

Daniel Thomas is a licensed insurance agent (Insurance License #2866954). Approximately 30% of Mr. Thomas' time is spent in this practice. From time to time, he may offer clients insurance products and advice.

This practice represents a conflict of interest because it gives Mr. Thomas an incentive to recommend products or services based on any compensation received. This conflict is mitigated by disclosures, procedures, and the firm's Fiduciary obligation to place the best interest of the client first and the clients are not required to purchase any products or services. Clients have the option to purchase these products or services through another insurance agent or financial educator of their choosing.

Item 5 Additional Compensation

Mr. Thomas receives compensation on the insurance he writes but does not receive any performance based fees.

Daniel Thomas may receive certain benefits from Gradient Investments, LLC (and/or its affiliated companies) based on achieving certain production thresholds. These thresholds are not based on the sale of any specific product or specific product type. These incentives include marketing assistance, access to technology, office support, and business trainings and trips. While some of these benefit the client, such as technology and training, some do not. This creates a conflict of interest because it gives an incentive to the representative to meet this threshold. This conflict is mitigated by disclosures, procedures and the firm's fiduciary obligation to place the best interest of the Client first. Clients are not required to use Gradient Investments, LLC or any of its affiliated companies.

Item 6 Supervision

Daniel Thomas is supervised by Casey Short, Chief Compliance Officer. Mr. Short reviews Daniel's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Mr. Short can be contacted:

By telephone: 972-987-9651

By email: casey.short@provisionretirement.com.

Item 1 Cover Page

Supervised Person brochure

Form ADV Part 2B

Gwendolyn Dee Louie



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gwen.louie@provisionretirement.com

This brochure supplement provides information about Gwendolyn D. Louie and supplements the Provision Asset, LLC's brochure. You should have received a copy of that brochure. Please contact Gwendolyn D. Louie if you did not receive the brochure or if you have any questions about the contents of this supplement.

Additional information about Gwendolyn D. Louie (CRD#7428513) is available on the SEC's website at www.adviserinfo.sec.gov.

MARCH 26, 2025

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Additional Investment Advisor Representative

Gwendolyn D. Louie

- Year of birth: 1975
-

Item 2 Educational Background and Business Experience

Educational Background:

- Dallas Theological Seminary; Master of Arts-Biblical Studies; 2001
- Truman State University; Bachelor of Science-Justice Systems; 1997

Business Experience:

- Provision Asset, LLC; Investment Advisor Representative; 11/2021 - Present
 - Provision Asset, LLC; Client Service Specialist; 04/2018 – Present
 - Homemaker; 2009-2018
-

Item 3 Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 Other Business Activities Engaged In

Ms. Louie has no outside business activities to disclose.

Item 5 Additional Compensation

Ms. Louie does not receive any other compensation. She does not receive any performance based fees.

Item 6 Supervision

Gwen Louie is supervised by Casey Short, Chief Compliance Officer. He reviews Gwen's work through client account reviews, quarterly personal transaction reports as well as face-to-face and phone interactions.

Mr. Short can be contacted:

By telephone: 972-987-9651

By email: casey.short@provisionretirement.com.



PROVISION

♦ A S S E T ♦

Provision Asset, LLC Privacy Policy February 11, 2025

Facts	WHAT DOES PROVISION ASSET, LLC DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal Law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.	
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none">• Social Security number and financial information• Account balances and transaction history	
How?	All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Provision Asset, LLC chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information.	Do we share?	Can you limit this sharing?
For our everyday business purposes- Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
For our marketing purposes- To offer our products and services to you.	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes- Information about your transactions and experiences.	Yes	No
For our affiliates' everyday business purposes- Information about your creditworthiness.	No	We don't share
For our affiliates to market to you	Yes	Yes
For our non-affiliates to market to you	No	We don't share
For buying, selling, or sharing of client data gathered for text messaging.	No	We don't share
To limit our sharing	<ul style="list-style-type: none">• Mail the form below <p>Please note: If you are a <i>new</i> client, we can begin sharing your information from the date we sent this notice. When you are <i>no longer</i> our client, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p>	

Questions?	Call 972-987-9651
WHO WE ARE	
Who is providing this notice?	Provision Asset, LLC
WHAT WE DO	
How do we protect your personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How do we collect your personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> • Open an account or deposit money
Why can't you limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes—information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
DEFINITIONS	
Affiliates	Companies related by common ownership or control. They can be financial and non-financial companies.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and non-financial companies.
Joint Marketing	A formal agreement between non-affiliated financial companies that together market financial products or services to you.

Mail-in Form

<p>If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.</p> <p><input type="checkbox"/> Apply only to me</p>	<p>Mark any you want to limit:</p> <p><input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me.</p>	
	Name	<p>Mail to:</p> <p>Provision Asset, LLC 1041 Citrine Cove Oak Point, TX 75068</p>
	Address	
	City, State, Zip	
	Account #	

Provision Asset, LLC Client Relationship Summary – Form CRS

Is an Investment Advisory Account Right for You?

There are different ways you can get help with your investments. You should carefully consider which types of accounts and services are right for you.

Item 1. Introduction

Provision Asset, LLC (“Firm”, “We”, “Us”, “Our”) is an SEC registered investment advisor and provides advisory services for a fee rather than for brokerage commissions. As a retail investor, it is important to understand the differences between services and fees of an investment advisor and a broker-dealer. *Investor.gov/CRS* offers free and simple tools to research firms and financial professionals. Additionally, it also provides educational materials about broker-dealers, investment advisors, and investing.

Item 2. Relationships and Services

What investment services and advice can you provide me?

We offer the following investment advisory services to you:

Asset Management: We will offer you advice on a regular basis. We will discuss your investment goals, design with you a strategy to achieve your investment goals, and regularly monitor your account. We will monitor your account on a discretionary basis (we can buy and sell investments in your account without asking you in advance). We do not limit advisors to proprietary products or a limited menu of products and types of investments. This service will continue pursuant to the terms of the executed Advisory Agreement. We do not have a minimum to open an account.

Financial Planning: Services will be provided to you based on your selection on the Advisory Agreement and may include, but are not limited to, a review of investment accounts, including reviewing asset allocation and providing repositioning recommendations; strategic tax planning; a review of retirement accounts and plans that have recommendations; a review of insurance policies and recommendations for changes, if necessary; one or more retirement scenarios; estate planning review and recommendations; and education planning with funding recommendations. Services will be considered complete upon delivery of the plan.

Referral Services: We recommend/refer the services of Third-Party Money Manager(s) (“TPM”) to manage your account(s). We act as the liaison between you and the TPM in return for an ongoing portion of the advisory fees charged by the TPM. We help you complete the necessary paperwork of the TPM, provide ongoing services to you, and will provide the TPM with any changes in your status as you provide them to us. We will deliver the Form ADV Part 2, Privacy Notice and Disclosure Statement of the TPM. We do not have discretion on these accounts.

Sub-Advisor: If deemed appropriate, we may hire a Sub-Advisor to manage a portion of, or your entire account. In these circumstances, we will continue to monitor the activity of the Sub-Advisor to ensure they are the best fit for your needs.

Qualified Plan Consulting: We will review the investment options available within the plan upon request. Provision will make investment recommendations to the client based on the investment options available and the client’s financial objectives.

Additional Information

For more information about our services, we recommend reading our ADV Part 2A Items 4, 5, 7 and 10.

Conversation Starters

“Given my financial situation, should I choose an investment advisory service? Why or why not?”

“How will you choose investments to recommend to me?”

“What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?”

Item 3. Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay?

We are paid for our services as follows:

Asset Management: The amount paid to our firm and your financial professional generally does not vary based on the type of investments selected on your behalf. The asset-based fee reduces the value of your account and will be generally deducted from your account. Some investments (such as mutual funds impose additional fees that will reduce the value of your investment over time. Also, with certain investments, you may have to pay fees such as “surrender charges” to sell the investment. Fees are billed. Our fees vary and are negotiable. Generally, the more assets you have in the advisory account, the more you will pay in total fees. We therefore have an incentive to increase the assets in your account in order to increase our fees. You may also pay a transaction fee when we buy and sell an investment for you. You will also pay fees to a broker-dealer or bank that will hold your assets (called “custody”). You pay our advisory fee even if there were no transactions within the account.

Financial Planning: We charge an hourly or fixed fee payable 50% up front with the balance due upon delivery of the completed plan.

Referral Services: Our firm and our associated persons may be paid a portion of the fees charged and collected by the TPM in the form of referral fees or consulting fees. Our fees are negotiable depending on the size, complexity of the client’s account(s), the experience and training of the advisor and other business considerations. This situation creates a conflict of interest because we may select a TPM who would pay us a larger percentage of the fee. This conflict is mitigated by our fiduciary duty and adherence to our code of ethics. When referring clients to a TPM, the client’s best interest will be the main determining factor.

Provision Asset, LLC Client Relationship Summary – Form CRS

Qualified Plan Consulting: We charge an hourly fee for consulting. Payment is due upon delivery of the recommendations.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying. For more information regarding our fees and costs, review ADV Part 2A Item 5.

Conversation Starters

"Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?"

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Revenue Sharing: We have an arrangement where we share in a portion of the management fee with TPM. This does not change the cost to you, it is a sharing arrangement paid from the TPM's portion of the advisory fee. The TPM will pay us a percentage of the net billing. This situation creates a conflict of interest because we may select a TPM who would pay us a larger percentage of the fee. This conflict is mitigated by our fiduciary duty and adherence to our code of ethics. When referring clients to a TPM, the client's best interest will be the main determining factor.

Marketing Support: We may receive marketing support payments in the form of reimbursements for bona fide, reasonable marketing expenses incurred in connection with marketing REITs, interval funds, or other investments. The amount of any marketing support payments, if any, shall be determined by the REIT company fund, or investment group in its sole discretion, but in any event, may not be greater than the bona fide reasonable expenses incurred by us and in no event shall be excessive or lavish, or otherwise call into question the propriety of the payments. The receipt of money creates a conflict of interest when selecting investment products for clients. This conflict is mitigated by disclosures, procedures, and the firm's fiduciary obligation to place the best interest of the Client first.

Commissions: Our associated persons may receive commissions from the sale of insurance products and services. This conflict is mitigated by our fiduciary duty and adherence to our code of ethics. When referring clients to purchase insurance, the client's best interest will be the main determining factor.

Conversation Starters

"How might your conflicts of interest affect me, and how will you address them?"

Additional Information

For more information about our conflicts of interest, we recommend reading our ADV Part 2A, Items 4 and 10.

How do your financial professionals make money?

Our financial services professionals are compensated based on a percentage of assets they manage, variable compensation and by sales commissions.

This is a conflict of interest because our financial professionals have an incentive to encourage you to increase your assets in your accounts, recommend our advisory services to you, and recommend you purchase investments that result in additional compensation to them. For more information about our conflicts of interest, we recommend reading our ADV Part 2A, Item 10.

Item 4. Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

No, please visit [Investor.gov/CRS](https://www.investor.gov/crs) for a free and simple search tool to research us and our financial professionals.

Conversation Starters

"As a financial professional, do you have any disciplinary history? For what type of conduct?"

Item 5. Additional Information

To find additional information about us and to request a copy of the *relationship summary*, please go to www.ProvisionAsset.com or send us an email at casey.short@provisionretirement.com. If you would like to request up-to-date information as well as to request a copy of the relationship summary, please contact us via phone at 972-987-9651.

Conversation Starters

"Who is my primary contact person? Is he or she a representative of an investment advisor or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?"