

# **Providence Capital Partners Inc.**

## **Form ADV Part 2A – Disclosure Brochure**

**Effective: March 14, 2019**

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Providence Capital Partners Inc. (“Providence Capital” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (303) 261-8015.

Providence Capital is a registered investment advisor with the U.S. Securities and Exchange Commission. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Providence Capital to assist you in determining whether to retain the Advisor.

Additional information about Providence Capital and its Advisory Persons is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 284868.

**Providence Capital Partners Inc.**  
**5299 DTC Blvd, Suite 1350, Greenwood Village, CO 80111**  
**Phone: (303) 261-8015 Fax: (720) 285-1923**  
<http://www.denverwealthmanagement.com/>

## Item 2 – Material Changes

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Form ADV 2 is divided into two parts: *Part 2A (the "Disclosure Brochure")* and *Part 2B (the "Brochure Supplement")*. The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about the Advisory Persons of Providence Capital. For convenience, we have combined these documents into a single disclosure document.

Providence Capital believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Providence Capital encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

### Material Changes

There have been no material changes to this Disclosure Brochure since the last filing and distribution to Clients.

### Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with our firm name or our CRD# 284668. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (303) 261-8015.

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## **Item 4 – Advisory Services**

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### **A. Firm Information**

Providence Capital Partners Inc. (“Providence Capital” or the “Advisor”) is a registered investment advisor with the SEC, which is organized as a Corporation under the laws of the State of Colorado. Providence Capital initiated business in September 2016 and is owned and operated by Bryson (“Blair”) Braden (Principal, Chief Compliance Officer) and Zachary T. Bouck (Principal, Chief Investment Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Providence Capital.

### **B. Advisory Services Offered**

Providence Capital offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and pension/retirement plans (each referred to as a “Client”).

The Advisor serves as a fiduciary to Clients, as defined under the applicable laws and regulations. As a fiduciary, the Advisor upholds a duty of loyalty, fairness and good faith towards each Client and seeks to mitigate potential conflicts of interest. Our fiduciary commitment is further described in our Code of Ethics. For more information regarding our Code of Ethics, please see Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.

#### Investment Management Services

Providence Capital provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Providence Capital works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. The Advisor manages Client accounts through the investment process known as Plan, Quality, Capture & Collect. This philosophy is based on the historical data of Harry Markowitz that 1) captures a variety of asset classes, which are chosen based on the goal of the investment, 2) annually rebalance the asset weightings back to the intended risk tolerance, and then 3) based on qualitative factors decide which sectors to investment in, while excluding certain sectors based on fundamentals of those companies and markets. Providence Capital will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds, corporate debt securities, certificates of deposit, United States government securities or options contracts to meet the needs of its Clients. The Advisor may retain certain legacy investments based on portfolio fit and/or tax considerations.

Providence Capital’s investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Providence Capital will construct, implement and monitor the portfolio to strive to meet the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Providence Capital evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Providence Capital may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Providence Capital may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Providence Capital may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of the Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client’s risk tolerance.

At no time will Providence Capital accept or maintain custody of a Client’s funds or securities, except for the limited authority as outlined in Item 15 - Custody. All Client assets will be managed within their designated

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account[s] at the Custodian, pursuant to the Client investment advisory agreement, please see Item 12 – Brokerage Practices.

#### Financial Planning Services

Providence Capital will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client's financial situation, depending on their goals, objectives and financial situation. For Clients in need of a comprehensive plan this service may include goal setting, cash flow analysis, insurance planning, short-term savings goals, investment analysis, detailed retirement plan forecast, Monte Carlo analysis & estate plan review.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Providence Capital may also refer Clients to an accountant, attorney or another specialist, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of Client's financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Certain financial planning and consulting recommendations pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to implement the transaction through the Advisor. The Investment Advisor Representatives (herein "Advisory Persons") will typically receive commissions for the implementation of recommendations for commissionable brokerage and insurance transactions, in their separate capacity as registered representatives or insurance professionals.

#### Retirement Plan Advisory Services

Providence Capital provides non-discretionary (ERISA 3(21) Fiduciary Services) retirement plan advisory services on behalf of retirement plans (each a "Plan") and the company (the "Plan Sponsor"). The Advisor's retirement plan advisory services are designed to assist the Plan Sponsor in meeting its fiduciary obligations to the Plan. Each engagement is customized to the needs of the Plan and Plan Sponsor. Services generally include:

- Vendor Analysis
- Plan Participant Enrollment and Education Tracking
- Investment Policy Statement ("IPS") Design and Monitoring
- Investment Management
- Performance Reporting
- Ongoing Investment Recommendation and Assistance
- ERISA 404(c) Assistance
- Benchmarking Services

Certain of these services are provided by Providence Capital serving in the capacity as a fiduciary under the Employee Retirement Income Security Act of 1974, as amended ("ERISA"). In accordance with ERISA Section 408(b)(2), the Plan Sponsor is provided with a written description of Providence Capital's fiduciary status, the specific services to be rendered and all direct and indirect compensation the Advisor reasonably expects under the engagement.

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### C. Client Account Management

Prior to engaging Providence Capital to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Providence Capital, in connection with the Client, will develop a strategy that seeks to achieve the Client's investment goals and objectives.
- Asset Allocation – Providence Capital will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Providence Capital will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Providence Capital will provide investment management and ongoing oversight of the Client's investment portfolio.

### D. Wrap Fee Programs

Providence Capital does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Providence Capital.

### E. Assets Under Management

As of December 31, 2019, Providence Capital manages the following assets:

Discretionary Assets	\$133,932,454
Non-Discretionary Assets	461,452
<b>Total Assets Under Management</b>	<b>\$134,393,906</b>

Clients may request more current information at any time by contacting the Advisor.

## Item 5 – Fees and Compensation

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The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client shall sign one or more agreements with the Advisor that detail the responsibilities of Providence Capital and the Client.

### A. Fees for Advisory Services

#### Investment Management Services

Fees for investment advisory fees services are charged quarterly based on an annual asset-based fee of up to 1.75% and due in advance based on the last business day of the prior calendar quarter. Fees may be negotiable depending on the size and complexity of the Client's account[s]. The fees are calculated based on assets under management at the beginning of each calendar quarter. Investment advisory fees are generally based on the following schedule:

<b>Assets Under Management (\$)</b>	<b>Annual Rate (%)</b>
First \$100,000	1.50%
Next \$150,000 (Up to \$250,000)	1.30%
Next \$250,000 (Up to \$500,000)	1.20%
Next \$500,000 (Up to \$1,000,000)	1.10%
Next \$1,000,000 (Up to \$2,000,000)	1.00%
Over \$2,000,000	Negotiable

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\* Minimum annual fee of \$1,500 not to exceed 1.75%, which may be waived at the sole discretion of the Advisor.

With a tiered-fee schedule as the Client's account value increases, the fee charged decreases. Below is an example of how the breakdown of Client fees works:

If the Client deposits \$150,000, the first \$100,000 will be charged 1.50% and the remaining \$50,000 will be charged 1.30%.

$\$100,000 \times 1.50\% \text{ per year} = \$1,500$

$\$50,000 \times 1.30\% \text{ per year} = \$650$

So, the total of the first-year fee would be \$2,150 or 1.43%

Fees may vary from the above fee schedule depending on the nature and complexity of each Client's circumstances, or with the inclusion of Financial Planning services, which is offered on an hourly or fixed financial planning fee basis, as described below. Fees may be negotiable at the sole discretion of the Advisor. An estimate for the total costs will be determined prior to establishing the advisory relationship.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

#### Financial Planning Services

Providence Capital offers financial planning services either on an hourly basis or a fixed engagement fee. Hourly engagements range up to \$350 per hour. Fixed fee engagement fees range up to \$10,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total hours and total costs will be provided to the Client prior to engaging for these services.

#### Retirement Plan Advisory Services

Fees for retirement plan advisory services are charged quarterly based on an annual asset-based fee of up to 1.00%, due in advance. Fees may also be charged as a fixed annual fee of up to \$10,000 per year, payable quarterly, in advance of each calendar quarter based off the last business day of the prior quarter. Fees may be negotiable depending on the size and complexity of the Plan. Certain existing Clients may have fee schedules that differ from the schedule below. Retirement plan advisory fees are generally based on the following schedule:

Assets Under Management	Annual Rate
Up to \$1,000,000	1.00%
Over 1,000,000	Negotiable

Fees may be directly invoiced to the Plan Sponsor or deducted from the assets of the Plan, depending on the terms of the retirement plan advisory agreement.

### **B. Fee Billing**

#### Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] at the Custodian. The Advisor or its delegate shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of each respective quarter. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Providence Capital at the beginning of each quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Providence Capital to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

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#### Financial Planning Services

Financial planning fees may be invoiced up to one hundred percent (100%) of the expected total fee upon execution of the financial planning agreement. At no time shall deliverable[s] be completed more than 6 months from the execution of the financial planning agreement.

#### Retirement Plan Advisory Services

Fees may be directly invoiced to the Plan Sponsor or deducted from the account of each Plan Participant, depending on the terms of the retirement plan advisory agreement.

### **C. Other Fees and Expenses**

Clients may incur certain fees or charges imposed by third parties, other than Providence Capital, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custody and securities execution fees charged by the Custodian. The Investment Advisory Fee charged by Providence Capital is separate and distinct from these custody and execution fees.

In addition, all fees paid to Providence Capital for investment advisory services are separate and distinct from the expenses charged by mutual funds and ETFs to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Providence Capital, but would not receive the services provided by Providence Capital which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Providence Capital to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

### **D. Advance Payment of Fees and Termination**

#### Investment Management Services

Providence Capital is compensated for its services at the beginning of the quarter after advisory services are rendered. Either party may request to terminate their services with Providence Capital in whole or in part, by providing advance written notice to the other party. The Client may terminate the retirement advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Advisor will refund any unearned, prepaid retirement plan advisory agreement from the effective date of termination to the end of the quarter or in the case of a fixed fee engage, the percentage of the engagement scope completed by the Advisor. The Client's retirement plan services agreement with the Advisor is non-transferable without the Client's prior written consent.

#### Financial Planning Services

Providence Capital requires an advance deposit as described above. Either party may terminate the financial planning agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for actual hours logged on the planning project times the contractual hourly rate or in the case of a fixed fee engage, the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior written consent.

#### Retirement Plan Advisory Services

Providence Capital is typically compensated for its retirement plan advisory services in advance of the quarter in which services are rendered. Either party may request to terminate the retirement plan advisory agreement, at any time, by providing advance written notice to the other party. The Client may also terminate the retirement plan

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advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, Providence Capital will promptly refund any unearned, prepaid fees to the Client. The Client's investment advisory agreement with Providence Capital is non-transferable without the Client's prior consent.

#### **E. Compensation for Sales of Securities**

Providence Capital does not buy or sell securities and does not receive any compensation for securities transactions in any Client's account, other than the investment advisory fees noted above.

In one's separate capacity as registered representative, an Advisory Person of Providence Capital may implement securities transactions on a commission basis through LPL Financial LLC ("LPL Financial"), a securities broker-dealer, and a member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). In such instances, an Advisory Person will receive commission-based compensation in connection with the purchase and sale of securities, including 12b-1 fees for the sale of investment company products. Compensation earned by an Advisory Person in one's capacity as a registered representative is separate and in addition to Providence Capital's advisory fees. This practice presents a conflict of interest because Advisory Persons who are registered representatives have an incentive to effect securities transactions for the purpose of generating commissions rather than solely based on the Client. We mitigate this conflict in two ways. First, Clients always have the right to choose whether to purchase securities products through one of our Advisory Persons. Second, Providence Capital will not charge an ongoing investment advisory fee on any assets implemented in the separate capacity of one of our Advisory Persons. Please see Item 10 – Other Financial Industry Activities and Affiliations.

Certain Advisory Persons may also be licensed as independent insurance professionals. These persons will earn commission-based compensation for selling insurance products, including insurance products they sell to Clients. Insurance commissions earned by these persons are separate and in addition to our advisory fees. This practice presents a conflict of interest because persons providing investment advice on behalf of our firm who are insurance agents have an incentive to recommend insurance products to Clients for the purpose of generating commissions rather than solely based on a Client's needs. However, to mitigate this conflict, Clients always have the right to choose whether to purchase insurance products through any person affiliated with our firm. Please see Item 10 – Other Financial Industry Activities and Affiliations.

#### **Item 6 – Performance-Based Fees and Side-By-Side Management**

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Providence Capital does not charge performance-based fees for its investment advisory services. The fees charged by Providence Capital are as described in Item 5 – Fees and Compensation above and are not based upon the capital appreciation of the funds or securities held by any Client.

#### **Item 7 – Types of Clients**

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Providence Capital offers investment advisory services to individuals, high net worth individuals, trusts, estates, businesses and pension/retirement plans. The amount of each type of Client is available on Providence Capital's Form ADV Part 1A. These amounts may change over time and are updated at least annually by the Advisor.

Providence Capital generally imposes a minimum annual fee of \$1,500, which will not exceed 1.75% annually, and may be waived at the sole discretion of the Advisor.

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

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### **A. Methods of Analysis**

Providence Capital primarily employs a fundamental analysis methods in developing investment strategies for its Clients. Research and analysis from Providence Capital are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

*Fundamental analysis* utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

As noted above, Providence Capital generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Providence Capital will typically hold all or a portion of a security for more than a year, but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Providence Capital may also buy and sell positions that are more short-term in nature depending on the goals of the Client and/or the fundamentals of the security, sector or asset class. Buying and selling positions that are more short term in nature carry higher transaction costs and may have tax implications.

### **B. Risk of Loss**

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Providence Capital will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in Item 13 – Review of Accounts.

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is essential for the analysis of a Client's account[s]. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process. Following are some of the risks associated with the Advisor's strategy:

#### Market Risks

The value of a Client's holdings may fluctuate in response to events specific to companies or markets, as well as economic, political, or social events in the U.S. and abroad. This risk is linked to the performance of the overall financial markets.

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#### ETF Risks

The performance of ETFs is subject to market risk, including the possible loss of principal. The price of the ETFs will fluctuate with the price of the underlying securities that make up the funds. In addition, ETFs have a trading risk based on the loss of cost efficiency if the ETFs are traded actively and a liquidity risk if the ETFs has a large bid-ask spread and low trading volume. The price of an ETF fluctuates based upon the market movements and may dissociate from the index being tracked by the ETF or the price of the underlying investments. An ETF purchased or sold at one point in the day may have a different price than the same ETF purchased or sold a short time later.

#### Mutual Fund Risks

The performance of mutual funds is subject to market risk, including the possible loss of principal. The price of the mutual funds will fluctuate with the value of the underlying securities that make up the funds. The price of a mutual fund is typically set daily therefore a mutual fund purchased at one point in the day will typically have the same price as a mutual fund purchased later that same day.

#### Options Contracts

Investments in options contracts have the risk of losing value in a relatively short period of time. Option contracts are leveraged instruments that allow the holder of a single contract to control many shares of an underlying stock. This leverage can compound gains or losses. Option costs may outweigh benefits. Long calls may result in losses of the full investment amount or may expire resulting in loss of the full investment amount. The Advisor does not employ shorts or naked call strategies.

**Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.**

### **Item 9 – Disciplinary Information**

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**There are no legal, regulatory or disciplinary events involving Providence Capital or any of its Supervised Persons.** Providence Capital and its Advisory Persons value the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are available on the Investment Adviser Public Disclosure website at <http://www.adviserinfo.sec.gov> by searching with our firm name or our CRD# 284868.

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

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#### Broker-Dealer Affiliation

As noted in Item 5.E, certain Advisory Persons are also registered representatives of LPL Financial. In an Advisory Person's separate capacity as a registered representative, the Advisory Person will typically receive commissions for the implementation of recommendations for commissionable transactions, this causes a conflict of interest. To mitigate this conflict Clients always have the right to choose whether to implement any recommendation provided by an Advisory Person of Providence Capital, with any broker-dealer. The Advisor ensures that the implementation of recommendations to the Client is done in the best interest of the Client. In addition, neither Providence Capital nor an Advisory Person will earn ongoing investment advisory fees in connection with any services implemented in the Advisory Person's separate capacity as a registered representative. Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

#### Insurance Agency Affiliations

As noted in Item 5.E, certain Advisory Persons are also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from one's role with Providence Capital. As an insurance professional, the Advisory Persons may receive customary commissions and other related revenues from the

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various insurance companies whose products are sold. The Advisor ensures that the implementation of recommendations to the Client is done in the best interest of the Client. The Advisory Persons are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients always have the right to choose whether to implement any recommendations made by an Advisory Person or an Advisory Person of Providence Capital, with any insurance professional.

In addition to the above-mentioned broker-dealer and insurance affiliations, certain Advisory Persons are also affiliated with SmartVestor, an advertising service for investing professionals.

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

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### **A. Code of Ethics**

Providence Capital has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Providence Capital (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Providence Capital and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Providence Capital’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (303) 261-8015.

### **B. Personal Trading with Material Interest**

Providence Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Providence Capital does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Providence Capital does not have a material interest in any securities traded in Client accounts.

### **C. Personal Trading in Same Securities as Clients**

Providence Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities that we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non-public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons have a conflict of interest when trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material non-public information. This risk is mitigated by Providence Capital requiring reporting of personal securities trades in order to determine that the Advisory Persons is not putting the Client into a disadvantage and adhering to the policies and procedures by its Supervised Persons for review by the Chief Compliance Officer (“CCO”) or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

### **D. Personal Trading at Same Time as Client**

While Providence Capital allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. **At no time will Providence Capital, or any Supervised Person of Providence Capital, transact in any security to the detriment of any Client.**

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## Item 12 – Brokerage Practices

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### A. Recommendation of Custodian[s]

Providence Capital does not have discretionary authority to select the broker-dealer/custodian for custody and execution services. The Client will engage the broker-dealer/custodian (herein the "Custodian") to safeguard Client assets and authorize Providence Capital to direct trades to the Custodian as agreed upon in the investment advisory agreement. Further, Providence Capital does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

As its Advisory Persons are also registered representatives of LPL Financial, Providence Capital and its Advisory Persons are limited in the custodian[s] in which they can recommend to Clients. Typically, Providence Capital will recommend that Clients establish their accounts at LPL Financial, where Providence Capital has access to LPL Financial's systems, back office support, research and other benefits.

While Providence Capital receives these economic benefits from LPL Financial, we believe LPL Financial provides quality execution and related services for our Clients at competitive prices. Price is not the sole factor Providence Capital considers in evaluating best execution and the recommendation of the Custodian. Providence Capital also considers the quality of the brokerage services provided by LPL Financial, including the firm's reputation, execution capabilities, commission rates, and responsiveness to our Clients and our firm. Clients are free to use whatever custodian they choose to implement financial planning recommendations. For investment advisory services, Providence Capital would be required to obtain permission to use a custodian other than LPL Financial due to the oversight role LPL Financial assumes over the Advisory Persons. Please see Item 14.

Following are additional details regarding the brokerage practices of the Advisor:

**1. Soft Dollars** - Soft dollars are programs offered by broker-dealers/custodians whereby an advisor enters into an agreement to place security trades with the broker-dealer/custodian in exchange for research and other services. Providence Capital receives soft dollar economic benefits from LPL Financial (Please see Item 14). Clients should be aware that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. To mitigate this conflict of interest the benefits received by the Advisor or its personnel through participation in the program do not depend on the amount of brokerage transactions directed to LPL Financial. As part of its fiduciary duties to clients, the Advisor at all times puts the interests of its clients first.

**2. Brokerage Referrals** - Providence Capital does not receive any compensation from any third party in connection with the recommendation for establishing an account.

**3. Directed Brokerage** – All Clients are serviced on a "directed brokerage basis", where Providence Capital will place trades within the established account[s] at the Custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s] at the Custodian. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). Providence Capital will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the Custodian.

## Item 13 – Review of Accounts

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Securities in Client accounts are monitored on a regular and continuous basis, at least monthly by Mr. Braden, Principal, Chief Compliance Officer of Providence Capital. Formal reviews with the Client are generally conducted at least annually.

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In addition to the investment, each Client account shall be internally reviewed at least quarterly. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account[s]. The Client is encouraged to notify Providence Capital if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

The Client will receive brokerage statements no less than quarterly from the Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with supplemental reports regarding their holdings, allocations, and performance based on the Client request.

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

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### **A. Compensation Received by Providence Capital**

Providence Capital does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Providence Capital may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Providence Capital may receive non-compensated referrals of new Clients from various third-parties.

#### Participation in Institutional Advisor Platform

Providence Capital has established institutional relationship with LPL Financial to assist the Advisor in managing Client account[s]. The Advisor receives access to software and related support as part of its relationship with LPL Financial. The software and related systems support may benefit the Advisor, but not its Clients directly. In fulfilling its duties to its Clients, the Advisor endeavors at all times to put the interests of its Clients first. Clients should be aware, however, that the receipt of economic benefits from a Custodian creates a conflict of interest since these benefits may influence the Advisor's recommendation of the Custodian over one that does not furnish similar software, systems support, or services. Additionally, the Advisor receives the following benefits from LPL Financial: financial start-up support; reimbursement to Clients for transfer costs to the platform/custodian; financing services, receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk that exclusively services its institutional participants; access to block trading which provides the ability to aggregate securities transactions and then allocate the appropriate shares to Client accounts; and access to an electronic communication network for Client order entry and account information.

### **B. Client Referrals from Solicitors**

Providence Capital does not engage paid solicitors for Client referrals. The Advisor does not receive compensation for referrals.

## **Item 15 – Custody**

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Providence Capital does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees, from Client account[s] at the Custodian. All Clients must place their assets with a "qualified custodian". Clients must engage their Custodian to retain their funds and securities and direct Providence Capital to utilize the Custodian for the Client's security transactions. Providence Capital would be required to obtain permission to use a custodian other than LPL Financial due to the oversight role LPL Financial assumes over the Advisory Persons. Clients should review statements provided by the Custodian and compare to any invoices or reports provided by Providence Capital to ensure accuracy, as the custodian does not perform this review. For more information about custodians and brokerage practices, see Item 12 - Brokerage Practices.

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If the Client gives the Advisor authority to move money from one account to another account, the Advisor may have custody of those assets. In order to avoid additional regulatory requirements, the Custodian and the Advisor have adopted safeguards to ensure that the money movements are completed in accordance with the Client's instructions.

#### **Item 16 – Investment Discretion**

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Providence Capital requires discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. These purchases or sales are subject to the specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Providence Capital. Discretionary authority will only be exercised upon written authorization to the Client based off the advisory agreement. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Providence Capital will be in accordance with each Client's investment objectives and goals.

#### **Item 17 – Voting Client Securities**

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Providence Capital does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting.

#### **Item 18 – Financial Information**

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Neither Providence Capital, nor its management, have any adverse financial situations that would reasonably impair the ability of Providence Capital to meet all obligations to its Clients. Neither Providence Capital, nor any of its Advisory Persons, have been subject to a bankruptcy or financial compromise. Providence Capital is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$1,200 or more for services to be performed six months or more in advance.

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## **Form ADV Part 2B – Brochure Supplement**

**for**

**Bryson B. Braden  
Principal, Chief Compliance Officer**

**Effective: March 15, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Bryson B. Braden (CRD# **5721333**) in addition to the information contained in the Providence Capital Partners Inc. (“Providence Capital” or the “Advisor”, CRD # 284868) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Providence Capital Disclosure Brochure or this Brochure Supplement, please contact us at (303) 261-8015.

Additional information about Mr. Braden is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or individual CRD# 5721333.

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## Item 2 – Educational Background and Business Experience

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Bryson B. Braden, born in 1986, is dedicated to advising Clients of Providence Capital as a Principal, Chief Compliance Officer. Mr. Braden earned a Bachelors of Business Administration in Finance, Business Management and General Business from New Mexico State University in 2009. Additional information regarding Mr. Braden's employment history is included below.

### Employment History:

Principal, Chief Compliance Officer, Providence Capital Partners Inc.	08/2016 to Present
Registered Representative, LPL Financial LLC	06/2012 to Present
Investment Advisor Representative, LPL Financial Inc.	06/2012 to 08/2016
Financial Advisor, Waddell & Reed, Inc.	10/2009 to 05/2012

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Braden.*** Mr. Braden has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Braden.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Braden.***

However, we do encourage you to independently view the background of Mr. Braden on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 5721333.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Braden is also a registered representative of LPL Financial LLC ("LPL Financial"). In Mr. Braden's separate capacity as a registered representative, he may receive compensation for the implementation of commissionable securities transactions this causes a conflict of interest. To mitigate this conflict Clients always have the right to choose whether to implement any recommendation provided by Mr. Braden of Providence Capital, with any broker-dealer. Mr. Braden ensures that the implementation of recommendations to the Client is done in the best interest of the Client. In addition, neither Providence Capital nor Mr. Braden will earn any investment advisory fees in connection with any services implemented in Mr. Braden's separate capacity as a registered representative. Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

### Insurance Agency Affiliations

Mr. Braden is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Braden's role with Providence Capital. As an insurance professional, Mr. Braden may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Braden ensures that the implementation of recommendations to the Client is done in the best interest of the Client. Mr. Braden are not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients always have the right to choose whether to implement any recommendations made by Mr. Braden or the Advisor or to utilize a different advisor.

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In addition to Mr. Braden's broker-dealer and insurance affiliations, Mr. Braden also periodically operates an animal husbandry and boarding service and is affiliated with SmartVestor, an advertising service for investing professionals.

#### **Item 5 – Additional Compensation**

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Mr. Braden has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Braden serves as the Principal, Chief Compliance Officer and Chief Compliance Officer of Providence Capital. Mr. Braden can be reached at (303) 261-8015.

Providence Capital has implemented a Code of Ethics, an internal compliance document, that guides each Supervised Person in meeting their fiduciary obligations to Clients of Providence Capital. Further, Providence Capital is subject to regulatory oversight by various agencies. These agencies require registration by Providence Capital and its Supervised Persons. As a registered entity, Providence Capital is subject to examinations by regulators, which may be announced or unannounced. Providence Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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# **Form ADV Part 2B – Brochure Supplement**

**for**

**Zachary T. Bouck**  
**Principal, Chief Investment Officer**

**Effective: March 15, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Zachary T. Bouck (CRD# **5523748**) in addition to the information contained in the Providence Capital Partners Inc. (“Providence Capital” or the “Advisor”, CRD # 284868) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Providence Capital Disclosure Brochure or this Brochure Supplement, please contact us at (303) 261-8015.

Additional information about Mr. Bouck is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 5523748.

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## Item 2 – Educational Background and Business Experience

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Zachary T. Bouck, born in 1983, is dedicated to advising Clients of Providence Capital as a Principal, Chief Investment Officer. Mr. Bouck earned a Bachelor of Arts in History from the University of Colorado in 2006. Additional information regarding Mr. Bouck's employment history is included below.

### Employment History:

Principal, Chief Investment Officer, Providence Capital Partners Inc.	08/2016 to Present
Registered Representative, LPL Financial LLC	06/2012 to Present
Investment Advisor Representative, LPL Financial Inc.	06/2012 to 08/2016
Financial Advisor, Waddell & Reed, Inc.	05/2008 to 06/2012
Guest Services, Towne Park	11/2006 to 01/2010

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Bouck.*** Mr. Bouck has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Bouck.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Bouck.***

However, we do encourage you to independently view the background of Mr. Bouck on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his individual CRD# 5523748.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Bouck is also a registered representative of LPL Financial LLC ("LPL Financial"). In Mr. Bouck's separate capacity as a registered representative, he may receive compensation for the implementation of commissionable securities transactions this causes a conflict of interest. To mitigate this conflict Clients always have the right to choose whether to implement any recommendation provided by Mr. Bouck of Providence Capital, with any broker-dealer. Mr. Bouck ensures that the implementation of recommendations to the Client is done in the best interest of the Client. In addition, neither Providence Capital nor Mr. Bouck will earn any investment advisory fees in connection with any services implemented in Mr. Bouck's separate capacity as a registered representative. Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

### Insurance Agency Affiliations

Mr. Bouck is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Bouck's role with Providence Capital. As an insurance professional, Mr. Bouck may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Bouck ensures that the implementation of recommendations to the Client is done in the best interest of the Client. Mr. Bouck is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This causes a conflict of interest in recommending certain products of the insurance companies. Clients always have the right to choose whether to implement any recommendations made by Mr. Bouck or the Advisor or to utilize a different advisor.

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In addition to Mr. Bouck's broker-dealer and insurance affiliations, Mr. Bouck also operates and co-owns a distillery and is affiliated with SmartVestor, an advertising service for investing professionals.

#### **Item 5 – Additional Compensation**

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Mr. Bouck has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Bouck serves as the Principal, Chief Investment Officer of Providence Capital and is supervised by Bryson Braden, the Chief Compliance Officer. Mr. Braden can be reached at (303) 261-8015.

Providence Capital has implemented a Code of Ethics, an internal compliance document, that guides each Supervised Person in meeting their fiduciary obligations to Clients of Providence Capital. Further, Providence Capital is subject to regulatory oversight by various agencies. These agencies require registration by Providence Capital and its Supervised Persons. As a registered entity, Providence Capital is subject to examinations by regulators, which may be announced or unannounced. Providence Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## **Form ADV Part 2B – Brochure Supplement**

**for**

**Glenn W. Frum, ChFC®  
Financial Advisor**

**Effective: March 15, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Glenn W. Frum, ChFC® (CRD# 1230692) in addition to the information contained in the Providence Capital Partners Inc. (“Providence Capital” or the “Advisor”, CRD# 284868) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Providence Capital Disclosure Brochure or this Brochure Supplement, please contact us at (303) 261-8015.

Additional information about Mr. Frum is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1230692.

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## Item 2 – Educational Background and Business Experience

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Glenn W. Frum, ChFC®, born in 1948, is dedicated to advising Clients of Providence Capital as a Financial Advisor. Mr. Frum also earned a Bachelor of Arts in English Literature from the University of Colorado in 1971. Additional information regarding Mr. Frum's employment history is included below.

### Employment History:

Financial Advisor, Providence Capital Partners Inc.	01/2017 to Present
Registered Representative, LPL Financial LLC	10/2013 to Present
Chartered Financial Consultant, Western Wealth Management, LLC	10/2013 to 12/2016
Financial Advisor, Providence Wealth Management	09/2013 to 12/2015
Financial Advisor, LPL Financial	11/2008 to 10/2013
Financial Advisor, New England Securities	06/1985 to 11/2008

### Chartered Financial Consultant® (ChFC®)

The Chartered Financial Consultant® (ChFC®) program prepares you to meet the advanced financial planning needs of individuals, professionals and small business owners. You'll gain a sustainable advantage in this competitive field with in-depth coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments and estate planning. The ChFC® requires three years of full-time, relevant business experience, nine two-hour course specific proctored exams, and 30 hours of continuing education every two years. Holders of the ChFC® designation must adhere to The American College's Code of Ethics.

### Program Objectives:

- Function as an ethical, competent and articulate practitioner in the field of financial planning
- Utilize the intellectual tools and framework needed to maintain relevant and current financial planning knowledge and strategies.
- Apply financial planning theory and techniques through the development of case studies and solutions.
- Apply in-depth knowledge in a holistic manner from a variety of disciplines; namely, estate planning, retirement planning or non-qualified deferred compensation.

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Frum.*** Mr. Frum has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Frum.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Frum.***

However, we do encourage you to independently view the background of Mr. Frum on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1230692.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Frum is also a registered representative of LPL Financial LLC ("LPL Financial"). In Mr. Frum's separate capacity as a registered representative, he may receive compensation for the implementation of commissionable securities transactions, this causes a conflict of interest. To mitigate this conflict Clients always have the right to

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choose whether to implement any recommendation provided by Mr. Frum of Providence Capital, with any broker-dealer. Mr. Frum ensures that the implementation of recommendations to the Client is done in the best interest of the Client. In addition, neither Providence Capital nor Mr. Frum will earn any investment advisory fees in connection with any services implemented in Mr. Frum's separate capacity as a registered representative. Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

#### Insurance Agency Affiliations

Mr. Frum is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Frum's role with Providence Capital. As an insurance professional, Mr. Frum may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Frum is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Frum or the Advisor.

#### **Item 5 – Additional Compensation**

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Mr. Frum has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Frum serves as a Financial Advisor of Providence Capital and is supervised by Bryson Braden, the Chief Compliance Officer. Mr. Braden can be reached at (303) 261-8015.

Providence Capital has implemented a Code of Ethics, an internal compliance document, that guides each Supervised Person in meeting their fiduciary obligations to Clients of Providence Capital. Further, Providence Capital is subject to regulatory oversight by various agencies. These agencies require registration by Providence Capital and its Supervised Persons. As a registered entity, Providence Capital is subject to examinations by regulators, which may be announced or unannounced. Providence Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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#### **Providence Capital Partners Inc.**

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<http://www.denverwealthmanagement.com/>

# **Form ADV Part 2B – Brochure Supplement**

**for**

**David C. Frum**  
**Financial Advisor**

**Effective: March 15, 2019**

This Form ADV 2B ("Brochure Supplement") provides information about the background and qualifications of David C. Frum (CRD# 5976823) in addition to the information contained in the Providence Capital Partners Inc. ("Providence Capital" or the "Advisor", CRD# 284868) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Providence Capital Disclosure Brochure or this Brochure Supplement, please contact us at (303) 261-8015.

Additional information about Mr. Frum is available on the SEC's Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5976823.

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## Item 2 – Educational Background and Business Experience

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David C. Frum, born in 1986, is dedicated to advising Clients of Providence Capital as a Financial Advisor. Mr. Frum also earned a Bachelor of Arts in Political Science from the University of Colorado at Boulder in 2008. Additional information regarding Mr. Frum's employment history is included below.

### Employment History:

Financial Advisor, Providence Capital Partners Inc.	01/2017 to Present
Registered Representative, LPL Financial LLC	10/2013 to Present
Investment Adviser Representative, Western Wealth Management LLC	10/2013 to 12/2016
Financial Advisor, Providence Wealth Management	10/2013 to 01/2016
Internal Wholesaler, North Star Realty Securities	09/2011 to 09/2013
Internal Sales, ServiceSource	04/2010 to 08/2011
Hand Seller, WineCru Beverage Distributor	11/2010 to 03/2011
Field Coordinator, Alliance for Climate Protection	04/2009 to 08/2009
Volunteer Coordinator, Colorado Campaign for Change	08/2008 to 12/2008

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Frum.*** Mr. Frum has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Frum.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Frum.***

However, we do encourage you to independently view the background of Mr. Frum on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 5976823.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Frum is also a registered representative of LPL Financial LLC ("LPL Financial"). In Mr. Frum's separate capacity as a registered representative, he may receive compensation for the implementation of commissionable securities transactions this causes a conflict of interest. To mitigate this conflict Clients always have the right to choose whether to implement any recommendation provided by Mr. Frum of Providence Capital, with any broker-dealer. Mr. Frum ensures that the implementation of recommendations to the Client is done in the best interest of the Client. In addition, neither Providence Capital nor Mr. Frum will earn any investment advisory fees in connection with any services implemented in Mr. Frum's separate capacity as a registered representative. Under supervision by LPL Financial, LPL Financial may have access to certain confidential information of the Client, including, but not limited to financial information, investment objectives, transactions and holdings information. Please see our Privacy Policy, which is included with this Disclosure Brochure.

### Insurance Agency Affiliations

Mr. Frum is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Frum's role with Providence Capital. As an insurance professional, Mr. Frum may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Frum is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending

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certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Frum or the Advisor.

#### **Item 5 – Additional Compensation**

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Mr. Frum has additional business activities where compensation is received that are detailed in Item 4 above.

#### **Item 6 – Supervision**

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Mr. Frum serves as a Financial Advisor of Providence Capital and is supervised by Bryson Braden, the Chief Compliance Officer. Mr. Braden can be reached at (303) 261-8015.

Providence Capital has implemented a Code of Ethics, an internal compliance document, that guides each Supervised Person in meeting their fiduciary obligations to Clients of Providence Capital. Further, Providence Capital is subject to regulatory oversight by various agencies. These agencies require registration by Providence Capital and its Supervised Persons. As a registered entity, Providence Capital is subject to examinations by regulators, which may be announced or unannounced. Providence Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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# **Form ADV Part 2B – Brochure Supplement**

**for**

**Richard P. Goblirsch  
Managing Partner**

**Effective: March 15, 2019**

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Richard P. Goblirsch (CRD# 1402758) in addition to the information contained in the Providence Capital Partners Inc. (“Providence Capital” or the “Advisor”, CRD# 284868) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Providence Capital Disclosure Brochure or this Brochure Supplement, please contact us at (303) 261-8015.

Additional information about Mr. Goblirsch is available on the SEC’s Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1402758.

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## Item 2 – Educational Background and Business Experience

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Richard P. Goblirsch, born in 1953, is dedicated to advising Clients of Providence Capital as a Managing Partner. Mr. Goblirsch earned an MBA from University Of Colorado at Denver in 1985. Mr. Goblirsch also earned a Bachelor's of Science in Engineering from University of North Dakota in 1975. Additional information regarding Mr. Goblirsch's employment history is included below.

### Employment History:

Managing Partner, Investment Advisor Representative, Providence Capital Partners Inc.	06/2018 to Present
Registered Representative, LPL Financial LLC	07/1985 to Present
Owner, R.P. Goblirsch & Associates	10/1986 to 12/2004

## Item 3 – Disciplinary Information

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***There are no legal, civil or disciplinary events to disclose regarding Mr. Goblirsch.*** Mr. Goblirsch has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Goblirsch.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. ***As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Goblirsch.***

However, we do encourage you to independently view the background of Mr. Goblirsch on the Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) by searching with his full name or his Individual CRD# 1402758.

## Item 4 – Other Business Activities

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### Broker-Dealer Affiliation

Mr. Goblirsch is also a registered representative of LPL Financial LLC ("LPL Financial"). LPL Financial is a registered broker-dealer (CRD# 6413), member FINRA, SIPC. In Mr. Goblirsch's separate capacity as a registered representative, Mr. Goblirsch will typically receive commissions for the implementation of recommendations for commissionable transactions. Clients are not obligated to implement any recommendation provided by Mr. Goblirsch. Neither the Advisor nor Mr. Goblirsch will earn any investment advisory fees in connection with any products or services implemented in Mr. Goblirsch's separate capacity as a registered representative.

### Insurance Agency Affiliations

Mr. Goblirsch is also a licensed insurance professional. Implementations of insurance recommendations are separate and apart from Mr. Goblirsch's role with Providence Capital. As an insurance professional, Mr. Goblirsch may receive customary commissions and other related revenues from the various insurance companies whose products are sold. Mr. Goblirsch is not required to offer the products of any particular insurance company. Commissions generated by insurance sales do not offset regular advisory fees. This may cause a conflict of interest in recommending certain products of the insurance companies. Clients are under no obligation to implement any recommendations made by Mr. Goblirsch or the Advisor.

## Item 5 – Additional Compensation

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Mr. Goblirsch has additional business activities where compensation is received that are detailed in Item 4 above.

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## **Item 6 – Supervision**

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Mr. Goblirsch serves as a Managing Partner of Providence Capital and is supervised by Bryson Braden, the Chief Compliance Officer. Mr. Braden can be reached at (303) 261-8015.

Providence Capital has implemented a Code of Ethics, an internal compliance document, that guides each Supervised Person in meeting their fiduciary obligations to Clients of Providence Capital. Further, Providence Capital is subject to regulatory oversight by various agencies. These agencies require registration by Providence Capital and its Supervised Persons. As a registered entity, Providence Capital is subject to examinations by regulators, which may be announced or unannounced. Providence Capital is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

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## Privacy Policy

Effective Date: March 15, 2019

### Our Commitment to You

Providence Capital Partners Inc. ("Providence Capital" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Providence Capital (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Providence Capital does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

### Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

### What information do we collect from you?

Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number[s]	Income and expenses
E-mail address[es]	Investment activity
Account information (including other institutions)	Investment experience and goals

### What Information do we collect from other sources?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

### How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

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### How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
<b>Servicing our Clients</b> We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting. Providence Capital shares Client information with LPL Financial due to the oversight LPL Financial has over certain supervised persons of the Advisor. You may also contact us at any time for a copy of the LPL Financial Privacy Policy.	Yes	No
<b>Marketing Purposes</b> Providence Capital does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Providence Capital or the client has a formal agreement with the financial institution. <b>We will only share information for purposes of servicing your accounts, not for marketing purposes.</b>	No	Not Shared
<b>Authorized Users</b> Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent[s] or representative[s].	Yes	Yes
<b>Information About Former Clients</b> Providence Capital does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients.	No	Not Shared

### Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy, and will provide you with a revised Policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

### Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (303) 261-8015.

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