



Central Provident Inc.

Form ADV Part 2A Appendix 1 – Wrap Fee Program Brochure

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Dated April 27, 2016

This Wrap Fee Program Brochure provides information about the qualifications and business practices of Central Provident Inc. If you have any questions about the contents of this Brochure, please contact us at 512-473-0800. 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.

Central Provident Inc. registered as an Investment Adviser with the Securities and Exchange Commission. Registration of an Investment Advisor does not imply any level of skill or training. You are encouraged to review this Brochure and Brochure Supplements for our firm's associates who advise you for more information on the qualifications of our firm and our employees.

Additional information about Central Provident Inc. is available on the SEC's website at www.adviserinfo.sec.gov. CRD: 283668

Item 2: Material Changes

Because this is the first filing of the Form ADV Part 2A Appendix 1, there are no material changes to report. In the future, any material changes made to this brochure will be listed under this item.

Item 3: Table of Contents

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Item 4: Services, Fees and Compensation

Description of Our Services

We offer wrap fee programs as described in this Wrap Fee Program Brochure. Our wrap fee accounts are managed on an individualized basis according to the client's investment objectives, financial goals, risk tolerance, etc.

Types of Advisory Services

We offer the following services:

Wealth Management Services

Central Provident provides investment solutions for any level of investor: novice to professional. After completing Central Provident's brief survey, we will be able to build a portfolio to meet your investment needs and provide an expected rate of return on your capital. We employ third party money managers to formulate a customized portfolio for you.

Wealth Management Services Wrap Fee Program Fee Schedule

Our standard advisory fee is 1.25% and is based on the market value of the assets under management. The annual fees are negotiable in certain cases and are paid on a daily basis. No increase in the annual fee shall be effective without agreement from the client by signing a new agreement or amendment to their current advisory agreement.

Advisory fees are directly debited from client accounts on each trading day. Because of this, any accounts terminated will not need their advisory rebated since they will be current on fees.

Additional bundled Service Cost Considerations

A wrap fee program allows our clients to pay a specified fee for investment advisory services and the execution of transactions. The advisory services may include portfolio management and the fee is not based directly upon transactions in your account. Your fee is bundled with our costs for executing transactions in your account(s). This results in a higher advisory fee to you. We do not charge our clients higher advisory fees based on their trading activity, but you should be aware that we may have an incentive to limit our trading activities in your account(s) because we are charged for executed trades. By participating in a wrap fee program, you may end up paying more or less than you would through a non-wrap fee program where a lower advisory fee is charged, but trade execution costs are passed directly through to you by the executing broker.

Additional Expenses Not Included in the Wrap Program Fee

You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses), mark-ups and mark-downs, spreads paid to market makers, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. These fees are not included within the wrap-fee you are charged by our firm.

Compensation

Our investment advisory representatives receive a portion of the advisory fee that you pay us, either directly as a percentage of your overall fee or as their salary from our firm. In cases where our investment advisory representatives are paid a percentage of your overall advisory fee, this may create an incentive to recommend that you participate in a wrap fee program rather than a non-wrap fee program (where you would pay for trade execution costs) or brokerage account where commissions are charged. This is because, in some cases, we may stand to earn more compensation from advisory fees paid to us through a wrap fee program arrangement if your account is not actively traded.

Item 5: Account Requirements and Types of Clients

We do have an account value requirement of \$100 to open or maintain an account.

Types of clients we typically manage wrap fee accounts on behalf of, include:

- Individuals and High Net-Worth Individuals

Item 6: Portfolio Manager Selection and Evaluation

Outside Portfolio Managers

We employ outside portfolio managers (“PM”) and as part of our due diligence process, we include both a quantitative and qualitative review of prospective PM. We analyze the historical performance, investment discipline and attribution quality of both prospective and current PMs. As part of this process, we will also review for possible style drift that might explain a prospective of current PM’s deviation from its expected investment discipline. We also supplement the quantitative process by speaking with prospective and current PMs. As part of our due diligence reviews, we will review the firm’s stability by evaluating ownership, the background and experience of investment personnel, the investment infrastructure, assets under management, commitment to the private account business, existing product/custodial relationships, growth strategies, and compliance processes.

In implementing PM investment decisions, we coordinate any exceptions or issues directly with the PM. We review the performance of Model Portfolio strategies, recommends changes to the PMs, analyzes asset allocation for various strategies and the investment composition of the Model Portfolios, and considers additional investment features to expand the investment opportunities of the Program.

Our firm owners are responsible for approving, removing, and the general monitoring of PMs. We may occasionally determine that a PM is no longer appropriate for managing a Model Portfolio. Reasons for replacing a PM may include a change in the investment style or processes employed by the PM, a change in the PM’s key personnel, and inferior performance as compared to applicable investment benchmarks, peer portfolio managers, or investment advisors with comparable investment styles. We will promptly notify you if we elect to replace the PM responsible for the Model Portfolio upon which your account investments are based.

Central Provident Inc. Portfolio Managers

Central Provident Inc., and its related persons, do not act as a Portfolio Manager in our wrap fee program. Our involvement is limited to designing the investment portfolio that consists of the portfolio managers we use.

Item 7: Client Information Provided to Portfolio Manager

Although the PM remains responsible for managing their portion of the Model Portfolios, they do not possess knowledge of your individual information or investment goals and objectives, and do not have a direct relationship with you.

Item 8: Client Contact with Portfolio Manager

Any questions regarding the management of the Model Portfolios or your account should be directed to your representative at Central Provident Inc.

Item 9: Additional Information

Disciplinary Information

We have determined that our firm and management have no disciplinary information to disclose.

Other Financial Industry Activities and Affiliations

Central Provident, persons under control of Central Provident, or its affiliates are not engaged in any other Financial Industry activities outside of what has already been stated in this brochure.

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

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, a prohibition on rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All members of the firm must acknowledge the terms of the Code of Ethics annually, or as amended.

All our employees are required to follow our Code of Ethics which places the interests of advisory clients first. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would not materially interfere with the best interest of our clients. In addition, the Code requires pre-clearance of many transactions,

and restricts trading in close proximity to client trading activity. Employee trading is continually monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between our firm and its clients.

It is our policy that the firm will not affect any principal or agency cross securities transactions for client accounts. We will also not cross trades between client accounts.

Our clients or prospective clients may request a copy of the firm's Code of Ethics by contacting us at the number listed on the cover of this brochure.

Review of Accounts

Client accounts will be reviewed regularly on a monthly basis by Mr. Alayev. During the regular review the account's performance is compared against like-managed accounts to identify any unacceptable performance deviation. Additionally, reasonable client imposed restrictions will be reviewed to confirm that they are being enforced. Events that may trigger a special review would be unusual performance, addition or deletions of client imposed restrictions, excessive draw-down, volatility in performance, or buy and sell decisions from the firm or per client's needs.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

Central Provident will not provide written reports to the client.

Client Referrals

Pursuant to SEC Regulation Section 275.206.4-3, Central Provident compensates other persons for client referrals through a solicitor's agreement. In such cases, the referred client will receive a separate written disclosure statement from the solicitor that will explain, among other things, the nature of our relationship with the solicitor and a description of the compensation the solicitor will receive from us.

Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to clients, and we have not been the subject of a bankruptcy proceeding.