

FORM ADV**Uniform Application for Investment Adviser Registration****Part II - Page 1****OMB APPROVAL**

OMB Number: 3235-0049
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Hours per response.....4.07

Name of Investment Adviser: Avant-Garde Advisors LLC						
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
	4600 S. Ulster St., Suite 500	Denver	CO	80237	(303)	900-1370

**This part of FORM ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any government authority.**

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(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form
are not required to respond unless the form displays a currently valid OMB control number.

Applicant: **Avant-Garde Advisors LLC**

SEC File Number:

801- **70654**

Date:

2/24/2010

1. A. Advisory Services and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- | | | |
|---|--|------------------|
| <input checked="" type="checkbox"/> (1) | Provides investment supervisory services | <u>25 est.</u> % |
| <input checked="" type="checkbox"/> (2) | Manages investment advisory accounts not involving investment supervisory services..... | <u>55 est.</u> % |
| <input checked="" type="checkbox"/> (3) | Furnishes investment advice through consultations not included in either service described above... | <u>10 est.</u> % |
| <input type="checkbox"/> (4) | Issues periodicals about securities by subscription | _____ % |
| <input type="checkbox"/> (5) | Issues special reports about securities not included in any service described above..... | _____ % |
| <input type="checkbox"/> (6) | Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... | _____ % |
| <input checked="" type="checkbox"/> (7) | On more than an occasional basis, furnishes advice to clients on matters not involving securities... | <u>10 est.</u> % |
| <input type="checkbox"/> (8) | Provides a timing service | _____ % |
| <input type="checkbox"/> (9) | Furnishes advice about securities in any manner not described above..... | _____ % |

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? ☐ Yes ☐ No

C. Applicant offers investment advisory services for: (check all that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> (1) A percentage of assets under management | <input type="checkbox"/> (4) Subscription fees |
| <input checked="" type="checkbox"/> (2) Hourly charges | <input type="checkbox"/> (5) Commissions |
| <input checked="" type="checkbox"/> (3) Fixed fees (not including subscription fees) | <input type="checkbox"/> (6) Other |

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- | | |
|---|---|
| <input checked="" type="checkbox"/> A. Individuals | <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations |
| <input type="checkbox"/> B. Banks or thrift institutions | <input type="checkbox"/> F. Corporations or business entities other than those listed above |
| <input type="checkbox"/> C. Investment companies | <input type="checkbox"/> G. Other (describe on Schedule F) |
| <input checked="" type="checkbox"/> D. Pension and profit sharing plans | |

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|--|--|
| <input checked="" type="checkbox"/> A. Equity securities | <input checked="" type="checkbox"/> H. United States government securities |
| <input checked="" type="checkbox"/> (1) exchange-listed securities | <input checked="" type="checkbox"/> I. Options contracts on: |
| <input checked="" type="checkbox"/> (2) securities traded over-the-counter | <input checked="" type="checkbox"/> (1) securities |
| <input checked="" type="checkbox"/> (3) Foreign issuers | <input checked="" type="checkbox"/> (2) commodities |
| <input checked="" type="checkbox"/> B. Warrants | J. Futures contracts on: |
| <input checked="" type="checkbox"/> C. Corporate debt securities (other than commercial paper) | <input checked="" type="checkbox"/> (1) tangibles |
| <input checked="" type="checkbox"/> D. Commercial paper | <input checked="" type="checkbox"/> (2) intangibles |
| <input checked="" type="checkbox"/> E. Certificates of deposit | K. Interests in partnerships investing in: |
| <input checked="" type="checkbox"/> F. Municipal securities | <input checked="" type="checkbox"/> (1) real estate |
| <input checked="" type="checkbox"/> G. Investment company securities: | <input checked="" type="checkbox"/> (2) oil and gas interests |
| <input checked="" type="checkbox"/> (1) variable life insurance | <input checked="" type="checkbox"/> (3) other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (2) variable annuities | <input checked="" type="checkbox"/> L. Other (explain on Schedule F) |
| <input checked="" type="checkbox"/> (3) mutual fund shares | |

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other (explain on Schedule F) |
| (3) <input checked="" type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | Securities and Exchange Commission |
| (4) <input checked="" type="checkbox"/> Corporate rating services | (7) <input checked="" type="checkbox"/> Company press releases |
| | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|--|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input checked="" type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input checked="" type="checkbox"/> Trading (securities sold within 30 days) | (7) <input checked="" type="checkbox"/> Other (explain on Schedule F) |
| (4) <input checked="" type="checkbox"/> Short sales | |

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5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
☒ ☐

(If yes, please describe these standards on Schedule F)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- ☐ A. Applicant is actively engaged in a business other than giving investment advice.
- ☐ B. Applicant sells products or services other than investment advice to clients.
- ☒ C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- ☐ A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- ☐ B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- ☐ C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
- | | |
|--|--|
| <input type="checkbox"/> (1) broker-dealer | <input type="checkbox"/> (7) accounting firm |
| <input type="checkbox"/> (2) investment company | <input type="checkbox"/> (8) law firm |
| <input type="checkbox"/> (3) other investment adviser | <input checked="" type="checkbox"/> (9) insurance company or agency |
| <input type="checkbox"/> (4) financial planning firm | <input type="checkbox"/> (10) pension consultant |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer |
| <input type="checkbox"/> (6) banking or thrift institution | <input type="checkbox"/> (12) entity that creates or packages limited partnerships |

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

- D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.. Yes No
☐ ☒

(If yes, describe on Schedule F the partnerships and what they invest in.)

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9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- ☐ A. As principal, buys securities for itself from or sells securities it owns to any client.
- ☒ B. As broker or agent effects securities transactions for compensation for any client.
- ☐ C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- ☒ D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- ☒ E. Buys or sell for itself securities it also recommended to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 10. Conditions for Managing Accounts.** Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes No
☐ ☒

(If yes, describe on Schedule F)

- 11. Review of Accounts.** If applicant provides investment supervisory services, manages investment advisory account, or holds itself out as providing financial planning or some similarly termed services:

- A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

Investment Advisory Services: Client accounts are reviewed quarterly only by Eric D. Patton, Chief Compliance Officer. Eric D. Patton is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at IA are assigned to this reviewer. Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

- B. Describe below the nature and frequency of regular reports to clients on their accounts.

Investment Advisory Services: Each client receives a quarterly report from the Custodian detailing that client's account performance.

Applicant: Avant-Garde Advisors LLC

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12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- | | | |
|--|-------------------------------------|-------------------------------------|
| | Yes | No |
| (1) securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (2) amount of securities to be bought or sold? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| (3) broker or dealer to be used? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| (4) commission rates paid? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

B. Does applicant or a related person suggest brokers to clients? ☒ Yes ☐ No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- | | | |
|---|-------------------------------------|--------------------------|
| A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? | Yes | No |
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? | Yes | No |
| | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than \$500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet?..... ☐ Yes ☒ No

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Avant-Garde Advisors LLC

SEC File Number:
801- 70654

Date:
2/24/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Avant-Garde Advisors LLC

IRS Empl. Ident. No.:

27-0855126

Item of Form (identify)	Answer												
Item 1.D	<p>Avant-Garde Advisors LLC (hereinafter "AGA") offers the following services to advisory clients:</p> <p>INVESTMENT SUPERVISORY SERVICES</p> <p>AGA offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. AGA creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a general plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Investment strategy • Asset allocation • Risk Tolerance • Personal investment policy • Asset selection • Regular portfolio monitoring <p>AGA evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. AGA will request discretionary authority from clients in order to select securities and execute transactions without permission from the client prior to each transaction. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.</p> <p>Fees for these services will be based on a percentage of Assets Under Management as follows:</p> <table border="0"> <thead> <tr> <th>TOTAL ASSETS UNDER MANAGEMENT</th><th>MAXIMUM ANNUAL FEE OF AGA</th></tr> </thead> <tbody> <tr> <td>0 - \$500,000</td><td>2.00% Equity/Balanced Max Fee 1.75% Fixed income Max Fee</td></tr> <tr> <td>\$500,001 - \$1,000,000</td><td>1.75% Equity/Balanced Max Fee 1.50% Fixed income Max Fee</td></tr> <tr> <td>\$1,000,001 - \$5,000,000</td><td>1.50% Equity/Balanced Max Fee 1.25% Fixed income Max Fee</td></tr> <tr> <td>\$5,000,001 - \$10,000,000</td><td>1.25% Equity/Balanced Max Fee 1.00% Fixed income Max Fee</td></tr> <tr> <td>\$10,000,001 and above</td><td>Negotiable Equity/Balanced Max Fee Negotiable Fixed income Max Fee</td></tr> </tbody> </table>	TOTAL ASSETS UNDER MANAGEMENT	MAXIMUM ANNUAL FEE OF AGA	0 - \$500,000	2.00% Equity/Balanced Max Fee 1.75% Fixed income Max Fee	\$500,001 - \$1,000,000	1.75% Equity/Balanced Max Fee 1.50% Fixed income Max Fee	\$1,000,001 - \$5,000,000	1.50% Equity/Balanced Max Fee 1.25% Fixed income Max Fee	\$5,000,001 - \$10,000,000	1.25% Equity/Balanced Max Fee 1.00% Fixed income Max Fee	\$10,000,001 and above	Negotiable Equity/Balanced Max Fee Negotiable Fixed income Max Fee
TOTAL ASSETS UNDER MANAGEMENT	MAXIMUM ANNUAL FEE OF AGA												
0 - \$500,000	2.00% Equity/Balanced Max Fee 1.75% Fixed income Max Fee												
\$500,001 - \$1,000,000	1.75% Equity/Balanced Max Fee 1.50% Fixed income Max Fee												
\$1,000,001 - \$5,000,000	1.50% Equity/Balanced Max Fee 1.25% Fixed income Max Fee												
\$5,000,001 - \$10,000,000	1.25% Equity/Balanced Max Fee 1.00% Fixed income Max Fee												
\$10,000,001 and above	Negotiable Equity/Balanced Max Fee Negotiable Fixed income Max Fee												

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Avant-Garde Advisors LLC

SEC File Number:
801- 70654

Date:
2/24/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Avant-Garde Advisors LLC

IRS Empl. Ident. No.:

27-0855126

Item of Form
(identify)

Answer

These fees are negotiable and the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Fees are paid monthly in advance, and clients may terminate their contracts with written notice. However, The first prorated month is payable in arrears. Refunds are given on a prorated basis, based on the number of days remaining in a month at the point of termination. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract. IA withdraws advisory fees directly from the client's accounts with written authorization. There is no account minimum.

REGARDING USE OF OUTSIDE MONEY MANAGERS

AGA may refer clients to other investment advisers that focus only on money management and do not deal directly with the public except through another adviser. If however, AGA were to refer you to a money manager you could otherwise access directly, the advisory fees you pay under that type of arrangement may be higher by the amount of AGA's fee over the amount of advisory fees payable by a client who enters into such a program without being referred by AGA. In a referral relationship, AGA may be compensated via a fee share from third party money managers to which it directs clients or AGA may charge a separate fee. **As a result of the involvement of multiple investment advisers, advisory fees under a referred management program, taken together, may exceed 2% but will not exceed 3%. Comparable services may be found elsewhere with lower fees through other investment advisers.**

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Avant-Garde Advisors LLC

SEC File Number:
801- 70654

Date:
2/24/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Avant-Garde Advisors LLC

IRS Empl. Ident. No.:

27-0855126

Item of Form (identify)	Answer
	<p>FINANCIAL PLANNING</p> <p>Financial plans and financial planning may include, but are not limited to: life insurance; tax concerns; retirement planning; investment planning; college planning; and debt/credit planning. These services will be based on fixed fees or hourly fees and the final fee structure will be documented in Exhibit I of the Financial Planning Agreement.</p> <p>FIXED FEES</p> <p>Depending upon the complexity of the situation and the needs of the client and the investment advisory representative's experience and expertise, the rate for creating client financial plans is between \$1,000 and \$50,000. Fees are paid 50% in advance, but never more than six months in advance, with the remainder due upon presentation of the plan. Fees that are charged in advance may be refunded based on the prorated amount of work completed at the point of termination. The fees are negotiable and the final fee schedule will be attached as Exhibit I of the Financial Planning Agreement. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract.</p> <p>HOURLY FEES</p> <p>Depending upon the complexity of the situation and the needs of the client and the investment advisory representative's experience and expertise, the hourly fee for these services is \$60 - \$500. The fees are negotiable and the final fee schedule will be attached as Exhibit I of the Financial Planning Agreement. Fees are paid in arrears upon completion. Because fees are charged in arrears, no refund is necessary. Clients may terminate their contracts without penalty, for full refund, within 5 business days of signing the advisory contract.</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
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Applicant:
Avant-Garde Advisors LLC

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Date:
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Avant-Garde Advisors LLC

IRS Empl. Ident. No.:

27-0855126

Item of Form (identify)	Answer
Item 3.K(3) & L	<p>TYPES OF INVESTMENTS</p> <p>AGA may also offer advice on or invest in the following types of securities: ETFs (exchange traded funds), REITs (real estate investment trusts), limited partnerships, hedge funds, private equity or other private offerings, as well as other securities that may be suitable for the clients.</p> <p>AGA also offers advice on cash management and certain treasury services through an unaffiliated broker-dealer, National Financial Services LLC which is under common ownership as Fidelity Brokerage Services LLC. AGA also offers advice on financial planning topics that are not specifically related to securities or investments.</p>
Item 4.C(7)	<p>INVESTMENT STRATEGIES</p> <p>Other investment strategies may be chosen by AGA if they meet your particular financial needs, risk profile and overall investment strategy. Cash management and some treasury services may also be offered through National Financial Services LLC.</p>
Item 5	<p>EDUCATION AND BUSINESS STANDARDS</p> <p>All investment advisor representatives must adhere to our code of Ethics. They must have an approved personal and regulatory background history, and a BA, BS or MBA, Appropriate examination or professional designations are also required to become licensed as an IAR in the states in which the IAR maintains a place of business. These typically include one of more of the following: Series 65 (Investment Adviser State Law Examination), Series 7 (General Securities Representative Examination) and Series 66 (Investment Adviser State Law Examination), Certified Financial Planner (CFP), Chartered Financial Consultant (ChFC), Chartered Financial Analyst (CFA) and other designations.</p>
Item 6	<p>EDUCATION AND BUSINESS BACKGROUND</p> <p>Eric D. Patton, born 1983</p> <p>Education Background: University of Wyoming, 2005 BA in Finance FINRA Examinations Series 6, 7, 24, 63, 65</p> <p>Business Background: 2009 – Present, Chief Compliance Officer, Avant-Garde Advisors LLC 2009 – Present, Chief Financial Officer, Avant-Garde Wealth Management Inc. 2006 – 2009, Registered Representative/Investment Advisory Representative, New England Financial</p>

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Avant-Garde Advisors LLC

IRS Empl. Ident. No.:

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Item of Form (identify)	Answer
Item 7.C	<p>OTHER BUSINESS ACTIVITIES</p> <p>Avant-Garde Advisors LLC is owned by Avant-Garde Wealth Management Inc., an insurance agency. Officers of AGA will spend 90% of their time on those activities and considers them their primary business.</p>
Item 8.C(9)	<p>OTHER FINANCIAL INDUSTRY AFFILIATIONS</p> <p>AGA is owned by Avant-Garde Wealth Management Inc., an insurance agency in the state of Colorado. From time to time, AGA will offer clients advice or products from those activities. Clients should be aware that these services pay a commission and involve a possible conflict of interest, as insurance products can conflict with the fiduciary duties of a registered investment adviser. AGA will always act in the best interest of the client; including the sale of commissionable products to advisory clients.</p>
Item 9.B, D & E	<p>PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS</p> <p>Representatives of AGA may also be registered representatives of Mutual Securities, a broker/dealer. For representatives that are dually registered, individual accounts will be treated as either fee based (investment advisory accounts) or commission based (broker-dealer accounts). For a given account, a client will not pay both commissions and advisory fees to AGA or its affiliates. For investment advisory accounts, however, there will be transactional compensation paid to the broker-dealer utilized by the client.</p> <p>Financial planning clients are in no way required to implement the plan through any representative of AGA in their capacity as an insurance agent or registered representative. Clients contracting for investment advisory supervision with a grant of discretionary authority to AGA are, however, expected to utilize the broker-dealer platform selected by AGA, which is currently the platform offered by National Financial Services LLC (NFS) and its affiliates including Fidelity Brokerage Services LLC (collectively, "Fidelity"). Brokerage offered through Fidelity may be more or less expensive than similar services offered elsewhere, but clients benefit from the quality of Fidelity's execution and the compliance and operational efficiencies resulting from Fidelity's platform.</p> <p>From time to time, representatives of AGA may buy or sell securities for themselves that they also recommend to clients. AGA will always document any transactions that could be construed as conflicts of interest and, except in extenuating circumstances, will transact client business before their own when similar securities are being bought or sold. AGA will do everything possible to mitigate these conflicts by disclosing to the client any possible conflict interest. AGA will act in a fiduciary manner, and will always act in the client's best interest.</p>

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Avant-Garde Advisors LLC

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Item of Form (identify)	Answer
Item 9	<p>CODE OF ETHICS</p> <p>AGA has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions.</p> <p>YOU HAVE A RIGHT TO SEE OUR CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK YOUR ADVISOR AT AVANT-GARDE ADVISORS LLC AT ANY TIME.</p>
Item 12.A(1&2)	<p>INVESTMENT OR BROKERAGE DISCRETION</p> <p>For those client accounts where AGA provides ongoing money management or investment advice with ongoing supervision, AGA will maintain limited power of attorney over client accounts with respect to securities to be bought and sold and amount of securities to be bought and sold.</p>
Items 12.B and 13.A	<p>USE OF FIDELITY PLATFORM</p> <p>AGA has an arrangement with National Financial Services LLC, and Fidelity Brokerage Services LLC (together with all affiliates, "Fidelity") through which Fidelity provides AGA with Fidelity's "platform" services. The platform services include, among others, brokerage, custodial, administrative support, record keeping and related services that are intended to support intermediaries like AGA in conducting business and in serving the best interests of their clients but that may benefit AGA.</p> <p>Fidelity charges brokerage commissions and transaction fees for effecting certain securities transactions (i.e., transactions fees are charged for certain no-load mutual funds, commissions are charged for individual equity and debt securities transactions). Fidelity enables AGA to obtain many no-load mutual funds without transaction charges and other no-load funds at nominal transaction charges. Fidelity's commission rates are generally considered discounted from customary retail commission rates. However, the commissions and transaction fees charged by Fidelity may be higher or lower than those charged by other custodians and broker-dealers.</p>

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Avant-Garde Advisors LLC

SEC File Number:
801- 70654

Date:
2/24/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Avant-Garde Advisors LLC

IRS Empl. Ident. No.:

27-0855126

Item of Form
(identify)

Answer

As part of the arrangement, Fidelity also makes available to AGA at no additional charge to AGA certain research and brokerage services, including research services obtained by Fidelity directly from independent research companies, as selected by AGA (within specified parameters). These research and brokerage services are used by AGA to manage accounts for which AGA has investment discretion. Without this arrangement, AGA might be compelled to purchase the same or similar services at its own expense.

As a result of receiving such services for no additional cost, AGA may have an incentive to continue to use or expand the use of Fidelity's services. AGA examined this potential conflict of interest when it chose to enter into the relationship with Fidelity and has determined that the relationship is in the best interests of AGA's clients and satisfies its client obligations, including its duty to seek best execution. A client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where the AGA determines in good faith that the commission is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer's services, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although AGA will seek competitive rates, to the benefit of all clients, it may not necessarily obtain the lowest possible commission rates for specific client account transactions. Although the investment research products and services that may be obtained by AGA will generally be used to service all of AGA's clients, a brokerage commission paid by a specific client may be used to pay for research that is not used in managing that specific client's account. AGA and Fidelity are not affiliates.

(Complete amended pages in full, circle amended items and file with execution page (page 1).)

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

Applicant:
Avant-Garde Advisors LLC

SEC File Number:
801- 70654

Date:
2/24/2010

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:

Avant-Garde Advisors LLC

IRS Empl. Ident. No.:

27-0855126

Item of Form (identify)	Answer
Item 13.A	ADDITIONAL COMPENSATION AGA may be compensated via a fee share from third party money managers to which it directs clients. This relationship will be disclosed in each contract between AGA and each third party money manager. The fees shared will not exceed any limit imposed by any regulatory agency.
Item 13.B	CASH SOLICITATION In accordance with Rule 206(4)-3 of the Investment Advisers Act of 1940, AGA may make cash payments to persons soliciting clients on AGA's behalf. AGA does not charge any solicited client a higher advisory fee as a result of the solicitation. Information regarding a particular solicitation arrangement, if one is in effect with respect to a particular client, is to be found in the solicitor's disclosure statement, which is to be provided to the client along with AGA's Form ADV Part II before the client enters into an advisory agreement with AGA. CAUTIONARY NOTE AGA cannot, and does not, guarantee that its efforts will be successful. Investment in securities always entails a degree of risk. This risk takes the form of a risk of loss of moneys invested and the form of a risk of underperformance in comparison to other investments or market indices. Past performance is no guarantee of future results. ADDITIONAL QUESTIONS If you have any questions regarding the services of AGA or this Form ADV Part II, please call Eric D. Patton at (303) 900-1370.

(Complete amended pages in full, circle amended items and file with execution page (page 1).)