

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

Part 2A of Form ADV: Firm Brochure

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This brochure provides information about the qualifications and business practices of Optimum Growth Advisors, LLC (hereinafter “OGA” or “firm” or “we”). If you have any questions about the contents of this brochure, please contact us at (781)-631 -9228 or at dchristian@ogadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about OGA is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for OGA is 108008.

Item 2. Summary of Material Changes

On July 28, 2010, the United State Securities and Exchange Commission (“SEC”) published “Amendments to Form ADV” which amends the disclosure document that we provide to clients as required by SEC Rules. This Brochure is a new document prepared according to the SEC's new requirements and rules. As such, this document is materially different in structure and requires certain new information that our previous brochure did not require.

In the future, this Item will discuss specific material changes that are made to the Brochure and provide clients with a summary of such changes.

In the past we have offered or delivered information about our qualifications and business practices to clients on at least an annual basis. Pursuant to new SEC Rules, we will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

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Item 4. Advisory Business

OGA is a fee-based SEC registered investment adviser with its principal place of business located in North Merrick, New York. OGA has a second office located at 33 Atlantic Avenue, Suite A, Marblehead, MA 01945 (the "Marblehead Office"). OGA was formed in 1996 and OGA became a limited liability company in 1998. The firm is 100% owned by Diane Englert Christian and Karen Japngie, the Managing Partners, in a 50%/50% partnership.

Investment Strategy Services

OGA manages investment advisory accounts using model asset allocation portfolios. Each model portfolio is designed to meet specific investment goals. OGA will manage these advisory accounts on a discretionary basis. Account supervision is guided by the stated objectives of the client (i.e., maximum capital appreciation, growth, income, or growth and income).

Investment Strategies

OGA utilizes a multi-phase investment strategy to create and execute an investment plan tailored to the clients' needs. Through personal discussions with the client in which the client's goals and objectives are established, OGA will work with each client to determine risk reward parameters and create a portfolio designed to meet the client's investment goals. Once the appropriate investment strategy has been determined, the portfolio will be managed based on the portfolio's goal. However, OGA strives to always place the needs of our clients first in determining the appropriate client investment strategy. Clients will retain individual ownership of all securities.

Investment Portfolio Strategies

OGA utilizes three primary investment portfolios to implement and execute the investment goals of our clients:

- 1) **Balanced Core Portfolio** - utilizes a blended combination of bonds and equities for clients who desire a conservative approach to investing.
- 2) **Focused Growth Portfolio** - utilizes a diversified approach to invest in equities with a focus on growth.
- 3) **Diversified ETF Model Portfolio** - aimed at obtaining efficient risk-return

diversification utilizing a bottom-up investment approach focusing on economic and market data. OGA utilizes six different ETF Model approaches (i. **OGA Fixed Income Model**, ii.

OGA Conservative-Diversification Model, iii. **OGA Core Portfolio Model**, iv. **OGA Blended All Equity Model**, v. **OGA Growth Equity Model**, and vi. **OGA High Yield Income Model**). See CONTINUATION Page 1

Item 5. Fees and Compensation

Model Portfolio Management Services

The annual fee for portfolio management services will be charged quarterly as a percentage of assets under management, according to the following schedule:

<u>Assets under Management:</u>	<u>Annual Fee (%)</u>
Up to \$2,000,000	1.50%
\$2,000,000 - \$10,000,000	1.00%
Over \$10,000,000	TBD per a separate Fee Schedule

OGA requires a minimum of \$500,000 of assets under management for these services.

OGA requires a minimum of \$50,000 of assets under management for ETFs.

Fees in General

Client fees will be directly debited from their custodial accounts, as authorized, or in certain circumstances, the Client will be invoiced in advance on the last day of each calendar quarter, based upon the value of the client's account as calculated by the custodian indicated on the monthly statements of the accounts under management with the custodian without regard to profit or loss on the last day of the previous calendar quarter, pro-rated for additions and withdrawals.

OGA's client fees are charged on a percentage of assets under management. Client facts, circumstances and needs may in some rare cases change the fee schedule. We may group certain related client accounts for the purposes of determining the account size and/or annualized fee.

Additionally, some existing client accounts may be charged lower fees due to the length of time they have been a client of OGA, or due to an existing client relationship with one of OGA's principals prior to the formation of OGA.

Maintenance Fees are charged on non-discretionary accounts of up to .75%

.....See CONTINUATION page 2

Item 7. Types of Clients

Our firm generally provides advisory services to individuals, trusts, estates, and charitable organizations.

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

Our firm employs fundamental and technical analysis to formulate client recommendations.

Fundamental Analysis: Fundamental analysis of a business involves analyzing its income statement, financial statements, its management and competitive advantages and its competitors-and markets. Fundamental school of thought maintains that markets may misprice a security in the short run but that the "correct" price will eventually be reached. Profits can be made by trading the mispriced security and then waiting for the market to recognize its "mistake" and re-price the security. However, fundamental analysis does not attempt to anticipate market movements. This presents a potential risk, as the price of a security can move up or down along with the overall market regardless of the economic and financial factors considered in evaluating the stock. Therefore, unforeseen market conditions and/or company developments may result in significant price fluctuations that can lead to investor losses.

Technical Analysis: Technical analysis seeks to identify price patterns and trends in financial markets and attempt to exploit those patterns. We follow and examine such indicators as price, volume, moving averages of the price and market sentiment.

Risks for all Forms of Analysis: Our securities analysis method relies on the assumption that the companies whose securities we purchase and sell, the rating agencies that review these securities, and other publicly-available sources of information about these securities, are providing accurate and unbiased data. While we are alter to indications that data may be incorrect, there is always a risk that our analysis may be compromised by inaccurate or misleading information.

Our firm employs the following investment strategies to implement investment advice given to clients:

Long-Term Purchases: We mostly purchase securities with the idea of holding them in the clients account for a year or longer. We may do this because we believe the securities to be currently undervalued. We may do this because we want exposure to a particular asset class over time, regardless of the current projection for this class. We may purchase and sell equities on established exchanges, U.S. Treasuries, Municipal and Corporate bonds and REITS.

.....See CONTINUATION page 3

Item 9. Disciplinary Information

Our firm has no reportable disciplinary events to disclose.

Item 10. Other Financial Industry Activities and Affiliations

Neither our firm nor our employees engage in any other financial industry activities or have any other financial industry affiliations.

Item 11. Code of Ethics, Participation in Client Transactions and Personal Trading

Code of Ethics Disclosure

9.E Our firm has adopted a Code of Ethics to comply with Rule 204A-1 under the Investment Advisers Act of 1940, which sets forth high ethical standards of business conduct that we require of our employees, including compliance with applicable federal securities

laws. Our Code of Ethics includes policies and procedures for the review of quarterly securities transactions reports as well as initial and annual securities holdings reports that must be submitted by the firm's access persons. Among other things, our Code of Ethics also requires the prior approval of any acquisition of securities in a limited offering (e.g., private placement) or an initial public offering. Our code provides for oversight, enforcement and recordkeeping provisions. A copy of our Code of Ethics is available to our advisory clients and prospective clients upon request to Lynn Bragdon, Compliance Officer, at the firm's Marblehead Office.

Our firm or individuals associated with our firm may buy or sell securities identical to those recommended to customers for their personal accounts. In addition, any related person(s) may have an interest or position in a certain security(ies) which may also be recommended to a client.

It is the expressed policy of our firm that no person employed by us may purchase or sell any security prior to a transaction(s) being implemented for an advisory account, and therefore, preventing such employees from benefiting from transactions placed on behalf of advisory accounts.

It is OGA's position that the purpose of securities transactions with regard to a client's portfolio is to make investments, NOT trades, for an approximate minimum of 3 to 5 years. It is the stock, rather than the price paid or the timing of the trade, which determines the investment success of the client's portfolio over time. The client portfolio is not a trading portfolio, it's purpose is to attain long-term capital appreciation. The employees, in transacting from time to time in their own accounts, do not in any way compete with the client on the price of a stock or execution for short-term gain or appreciation. It is important to note that this is an investment process and that value is recognized OVER TIME, not by buying at the right price or value today for short-term gain.See CONTINUATION page 4

Item 12. Brokerage Practices

OGA requests that it be provided with written authority to determine which securities, the amounts of securities that are bought or sold, the broker dealer to use for client transactions and the commission costs that will be charged to our clients for these transactions.

OGA will endeavor to select those brokers or dealers that will provide the best services at the lowest commission rates and costs possible. The reasonableness of transaction costs are based on the broker's ability to provide professional services at competitive commission rates, research and other services which will help OGA in providing investment management services to clients. OGA may, therefore recommend the use of a broker who provides useful research and securities transaction services even though a lower commission may be charged by a broker who offers no research services and minimal securities transaction assistance. Research services may be useful in servicing all our clients, and not all of such research may be useful for the account for which the particular transaction was effected. However, we believe that, as a general rule, research analysis is used to enhance the investment discipline and selection process and is therefore beneficial to our clients as a whole.

Directed Brokerage

OGA suggests that advisory Clients custody their assets at Barclays Capital or in some circumstances with UBS Financial where OGA maintains relationships. This allows client assets to be "blocked" together when executing trades. OGA will block trades, where possible, and advantageous to clients. This blocking of trades permits the trading of aggregate securities composed of assets from multiple client accounts. Block trading may permit equity trades to be executed in a more timely and more equitable manner while allowing OGA to obtain an average share price for clients participating in the block.

Partial fills of blocked trades will generally be allocated on a pro rata basis. However, adjustments to this pro rata allocation may be made to avoid having odd amounts of shares held in any client account or to avoid deviations from pre-determined minimum/maximum holdings limits established for any account.See CONTINUATION Pages 5 and 6

Item 13. Review of Accounts

Portfolio Management Services

OGA will continuously monitor the underlying securities in client accounts and perform at least weekly reviews of account holdings for all clients. If OGA believes that due to market changes or market circumstances, a particular investment is performing inadequately, or if OGA believes that a different investment is more suitable for the portfolio's goal, then OGA will recommend a different investment and reinvest the client's assets accordingly. Accounts are reviewed for consistency with client investment strategy, asset allocation, risk tolerance and performance relative to the appropriate benchmark.

More frequent reviews may be triggered by changes in an account holder's personal, tax or financial status. Economic and macroeconomic specific events may also trigger reviews.

In addition to the monthly statements and confirmations of transactions that clients receive from their broker dealer, our firm will provide quarterly holdings and/or annual performance reports.

Item 14. Client Referrals and Other Compensation

OGA does not receive any additional compensation from third parties for providing investment advice to its clients and does not compensate anyone for client referrals.

However, OGA may enter into a relationship whereby unaffiliated asset gatherers or marketing persons will be compensated (based on a percentage of annual fee earned) for introducing and maintaining client relationships. OGA continues to compensate a retired employee for the maintenance of a client relationship based on a percentage of the accounts' annual fees, payment is made quarterly after client investment fee is paid to OGA. The compensation is disclosed and acknowledged by the client.

OGA is aware of the special considerations promulgated under Section 206(4)-3 of the Investment Advisers Act of 1940 and similar state regulations. As such, appropriate disclosure shall be made, all written instruments will be maintained by OGA and all applicable Federal and/or State laws will be observed. As such, OGA will obtain confirmation that clients referred to us have received our Form ADV Part 2 and the separate written disclosure document from the referrer prior to entering into an advisory relationship with them. Additionally, the fee paid to a solicitor by OGA will be specified in a separate disclosure document provided to the client.

Item 15. Custody

OGA strongly recommends to all of our management clients to carefully review and compare their quarterly reviews of account holdings and/or performance results to those they receive from their custodian.

Item 16. Investment Discretion

OGA requires that advisory clients grant the firm the discretionary authority to determine which securities and the amounts of securities that are to be bought or sold for the clients account(s). OGA further requires that such authority be granted in writing in the Advisory Agreement. Clients may change/amend these limitations as desired. Such amendments shall be submitted in writing.

OGA also requires that client's with non-discretionary accounts maintain a signed non-discretionary Advisory Agreement as part of their family of accounts. Non-discretionary accounts are subject to Financial Service fees or Maintenance fees if OGA oversees and parlays investment advice to the client regarding the assets in the non-discretionary account.

Item 17. Voting Client Securities

Advisory clients may elect to delegate their proxy voting authority to us. Alternatively, clients may, at their election, choose to receive proxies related to their own accounts, in which case we may consult with clients as requested. (With respect to ERISA accounts, we will vote proxies unless the plan documents specifically reserve the plan sponsor's right to vote proxies).

When OGA has discretion to vote proxies for our clients, we will vote those proxies in the best investment interests of our clients and in accordance with our established policies and procedures. Our firm will retain all proxy voting books and records for the requisite period of time, including a copy of each proxy statement received, a record of each vote cast, a copy of any document created by us that was material to making a decision how to vote proxies, and a copy of each written client request for information on how the adviser voted proxies. If our firm has a conflict of interest in voting a particular action, we will notify the client of the conflict and retain an independent third-party to cast a vote.

Clients may obtain a copy of our complete proxy voting policies and procedures by contacting Lynn Bragdon, Compliance Officer directly. Clients may request, in writing, information on how proxies for his/her shares were voted. If any client requests a copy of our complete proxy policies and procedures or how we voted proxies for his/her account(s), we will promptly provide such information to the client.

We will neither advise nor act on behalf of the client in legal proceedings involving companies whose securities are held in the client's account(s), including, but not limited to, the filing of "Proofs of Claim" in class action settlements. If desired, clients may direct us to transmit copies of class action notices to the client or a third party. Upon such direction, we will make commercially reasonable efforts to forward such notices in a timely manner.

Item 18. Financial Information

Under no circumstances will we earn fees in excess of \$1,200 more than six months in advance of services rendered.

Item 19 Requirements for State-Registered Advisers

N/A

Item 4. Continued - Advisory Business

In order to ensure that OGA's initial determination of the investment objective and guidelines developed with each client remains suitable and that the client's portfolio continues to be managed in a manner suitable to the client's financial circumstances, OGA will maintain ongoing risk return and asset allocation information in the client's file.

While OGA will notify clients whose accounts are managed on a discretionary basis in writing, on an annual basis, to request updated information regarding the client's financial situation, OGA strives to stay in constant contact with clients and reviews portfolios with clients at least quarterly. If during these reviews, new risk reward parameters are determined and approved by the client(s) then such new parameters will be executed going forward.

When OGA works with a potential new client, our firm presents our investment philosophy to the potential client to ensure that the needs and goals of our clients are compatible with our approach. Inherent to OGA's investment philosophy, is the fundamental belief that portfolio management is a process that achieves returns over time by the adherence to a specific, consistent and long-term investment discipline. While OGA has discretion over the securities in client portfolios (as set forth in greater detail in the prospective client folder), the investment philosophy of the firm imposes a cap of 4% of the total market (not including price appreciation during the holding period) value of the account on a cost basis, except for the purchase of fixed income securities.

In the event that a Client wishes to liquidate their account in full, such direction must be made to OGA in writing prior to any such liquidation may take place.

OGA monitors accounts on a weekly basis. If OGA believes that due to market changes or market circumstances, a particular investment is performing inadequately, or if OGA believes that a different investment is more suitable for the portfolio's goal, then OGA will recommend a different investment and reinvest the client's assets accordingly. OGA makes decisions to sell specific securities with a focus on the investment criteria and performance of the specific security tasking priority and tax implications/benefits secondarily.

OGA currently has approximately \$129,000,000 in assets under management.

Massachusetts Law requires disclosure that information on disciplinary history and the registration of OGA and its associated persons may be obtained by contacting the Public Reference Branch of the Securities and Exchange Commission at (202) 942-8090. Disciplinary history may also be obtained from the Massachusetts Securities Division at (617) 727-3548, and if asked, OGA and its associated persons must also disclose the history.

Item 5 Continued -Fees and Compensation

Account Termination

Clients will have a period of five (5) business days from the date of signing the agreement to unconditionally rescind the agreement and receive a full refund of all fees. Thereafter, either party may terminate the advisory relationship, as stipulated in the advisory agreement. If OGA receives verbal instructions to terminate the advisory relationship, then all investment activity will cease.

A cancellation/termination letter, or email, will be required within a reasonable time frame. Upon termination of any account, any prepaid, unearned fees will be promptly refunded, and any earned, unpaid fees will be due and payable. OGA will liquidate all positions bought by OGA.

Mutual Fund Fees and Expenses: All fees paid to our firm for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds to their shareholders. These fees and expenses are described in each fund's prospectus. These fees will generally include a management fee, other fund expenses, and a possible distribution fee. A client could invest in a mutual fund directly, without the services of our firm. In that case, the client would not receive the services provided by us which are designed, among other things, to assist the client in determining which mutual fund or funds are most appropriate to each client's financial condition and objectives. Accordingly, the client should review both the fees charged by the funds and the fees charged by us to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided. Additionally, average fees for ETF's will be disclosed in writing to prospective ETF clients.

Brokerage and Custodian Fees

In addition to advisory fees paid to our firm, clients will also be responsible for all transaction, brokerage, and custodian fees incurred as part of their custodial account management.

OGA does not engage in performance based fees. OGA charges quarterly fees based on the market valuation of the account, maintenance fees and one time financial planning fees.

Item 8 Continuation - Methods of analysis

OGA will not buy or sell options, futures, commodities, currencies or maintain any short positions.

OGA attempts to minimize the risk inherent in this strategy/approach as we attempt to focus on strong fundamentals, diversification, limiting individual equity values to no more than 6% (not on a cost basis), continuously monitor and review securities in our portfolios and reviewing equities for the appropriate time to sell each security.

OGA utilizes this form of analysis with respect to our Balanced Core Portfolio, Focused Growth Portfolio and our diversified ETF Model Portfolio.

A risk in a long-term purchase strategy is that, by holding the security for this length of time, we may not take advantages of short-term gains that could be profitable to a client.

Moreover, if our predictions are incorrect, a security may decline sharply in value before we make the decision to sell.

Clients should understand that investing in any securities, including mutual funds, involves a risk of loss of both income and principal.

Item 11 Continuation - Code of Ethics

AIMR-PPS and GIPS Compliance

OGA is in full compliance with the AIMR-PPS and GIPS ethical standards for investment performance presentation to ensure fair representation and full disclosure of an investment firm's performance history.

OGA seeks to define its firm by its investment process as set forth in its brochure, website and other materials to adequately apply its investment processes to the accounts in which it has full discretionary investment management authority as well as to reflects the performance for each account and in composites of similar investment style and client asset allocation in a documented, adequately disclosed investment presentation in compliance with both the Securities and Exchange Commission as well as in compliance with AIMR-PPS and GIPS Standards.

OGA believes that full investment discretion is defined as having client authorization to act on the client's behalf to build a pre-disclosed, defined portfolio of investments that are reflective of the portfolio products offered by OGA as well as maintaining the ongoing portfolio, targeting a benchmark rate or return or attaining a preservation of capital or some combination thereof.

For further information on OGA's commitment to AIMR-PPS and GIPS compliance, additional information is available upon request.

Item 12 Continuation- Brokerage Practices

If a client declines to custody assets at one of the above referenced custodians, they have the option of selecting their own custodian. A Client's preference for directed brokerage shall be acknowledged in the advisory agreement. However, OGA reserves the right to take on a prospective client should they decline to utilize the suggested custodial relationship.

Soft Dollar Arrangements

Generally, in addition to a broker's ability to provide the "best execution" for OGA's clients, OGA may consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for such services or products with "soft dollars." There is currently a soft dollar arrangement in place with Barclays Capital ("Barclays") and UBS Financial ("UBS"), whereby a percentage (%) of annual commission fees are earmarked to pay for outside research services such as that provided by Thomson Financial Services that OGA has deemed necessary in its' evaluation and selection of securities. As well as 80% of the cost of a one (1) year license fee for Portfolio Management software provided by Advent Software. Because many of the products or services could be considered to provide a benefit to OGA and, because the "soft dollars" used to acquire them are client assets, OGA could be considered to have a conflict of interests in allocating client brokerage business: it could receive valuable benefits by selecting Barclays to execute client transactions and the transactions compensation charged by Barclays might not be the lowest compensation OGA might otherwise be able to negotiate. In addition, OGA theoretically could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products or services.

OGA's use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), OGA will make a good faith determination that the amount of commissions or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all the factors described below, that the compensation paid to Barclays is reasonable in relation to the value of all the brokerage and research products and services provided by Barclays.
.....SeeCONTINUATIONPage6

Item 12 Continuation - Brokerage Practices

These services include but are not limited to custodial costs, transaction costs, equity research and bond research costs. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in OGA's performance of its overall responsibilities to all of its clients. In some cases, the commissions or other transaction fees charged by Barclays for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge. In such cases, however, the products or services involved are used solely for the benefit of the client in whose account the commissions or other fees are incurred. OGA does not have the ability to negotiate individual account fees or to prevent fee increases charged by the custodian.

It is OGA's position that after due diligence and research of relevant market data points, the fees charged by our recommended custodian are competitive in the marketplace.

No favorable commission rate is given to OGA personnel above the rates negotiated on behalf of clients by OGA.

Part 2B of Form ADV: *Brochure Supplement*

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02/28/2012

This brochure supplement provides information about Diane E. Christian that supplements the Optimum Growth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Diane E. Christian if you did not receive Optimum Growth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Diane E. Christian is available of the SEC's website at www.adviserinfo.sec.gov.

Item 2. Educational Background and Business Experience

Diane E. Christian, Managing Partner

Year of Birth: 1963

Education:

Ms. Christian graduated from Boston College in 1985 with a Bachelor of Arts degree in Economics. She received her Chartered Financial Analyst designation in 1992.

Business Background:

Managing Partner of Optimum Growth Advisors, LLC, 07/1997 to present.

Item 3. Disciplinary Information

Ms. Christian has no history of any disciplinary events.

Item 4. Other Business Activities

Ms. Christian is not engaged in any other business or occupation.

Item 5. Additional Compensation

Ms. Christian does not receive any additional compensation from third parties (except as set forth in Item 14 of the Firm Brochure.

Item 6. Supervision

Ms. Christian and Karen Japngie, as Managing Partners of Optimum Growth Advisors, LLC, are responsible for all supervision and formulation and monitoring of investment advice offered to clients. Ms. Christian and Ms. Japngie review and oversee all material investment policy changes and conducts periodic testing to ensure that client objectives and mandates are being met.

Part 2B of Form ADV: *Brochure Supplement*

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02/28/2012

This brochure supplement provides information about Karen M. Japngie that supplements the Optimum Growth Advisors, LLC brochure. You should have received a copy of that brochure. Please contact Karen M. Japngie if you did not receive Optimum Growth Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

Additional information about Karen M. Japngie is available of the SEC's website at www.adviserinfo.sec.gov

Item 2. Educational Background and Business Experience

Karen M. Japngie, Managing Partner

Year of Birth: 1958

Education:

Ms. Japngie attended the College of Financial Planning

Business Background:

Managing Partner of Optimum Growth Advisors, LLC, 07/1997 to present.

Item 3. Disciplinary Information

Ms. Japngie has no history of any disciplinary events.

Item 4. Other Business Activities

Ms. Japngie is not engaged in any other business or occupation.

Item 5. Additional Compensation

Ms. Japngie does not receive any additional compensation from third parties (except as set forth in Item 14 of the Firm Brochure.

Item 6. Supervision

Ms. Japngie and Diane Christian, as Managing Partners of Optimum Growth Advisors, LLC, are responsible for all supervision and formulation and monitoring of investment advice offered to clients. Ms. Japngie and Ms. Christian review and oversee all material investment policy changes and conducts periodic testing to ensure that client objectives and mandates are being met.

