

## Item 1 Cover Page

Part 2A of Form ADV

Firm Brochure

IDG Advisors, LLC

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This brochure provides information about the qualifications and business practices of IDG Advisors, LLC. If you have any questions about the contents of this brochure, please contact us at (801)376-2643 or via email at [rem@idgcpa.com](mailto:rem@idgcpa.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 IDG Advisors, LLC is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

Please note that registration as an investment advisory firm does not imply a certain level of skill or training.

## **Item 2      Material Changes**

There are no material changes as this is IDG Advisors, LLC's first filing on the new ADV Part 2 format.

## Item 3 Table of Contents

### Contents

Item 1	Cover Page .....	1
Item 2	Material Changes .....	2
Item 3	Table of Contents.....	3
Item 4	Advisory Business.....	4
Item 5	Fees and Compensation.....	5
Item 6	Performance-Based Fees and Side-by-Side Management.....	6
Item 7	Types of Clients .....	6
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss .....	6
Item 9	Disciplinary Information.....	7
Item 10	Other Financial industry Activities and Affiliations.....	7
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading .....	8
Item 12	Brokerage Practices .....	8
Item 13	Review of Accounts.....	10
Item 14	Client Referrals and Other Compensation .....	10
Item 15	Custody .....	10
Item 16	Investment Discretion.....	10
Item 17	Voting Client Securities .....	11
Item 18	Financial Information .....	11
Item 19	Requirements for State Registered Advisers .....	11
	Brochure Supplement .....	12
Item 1	Cover Page .....	12
Item 2	Educational Background and Business Experience.....	12
Item 3	Disciplinary Information.....	13
Item 4	Other Business Activities.....	13
Item 5	Additional Compensation .....	13
Item 6	Supervision.....	13

## **Item 4      Advisory Business**

### **About the Firm**

IDG Advisors, LLC is a registered investment adviser located in Denver, Colorado.

The Firm commenced business in 2004. Our owners are Ian D. Gardenswartz, LaDonna M. Jurgensen, Randy L. Kite, and Richard L. Merg.

### **Description of Advisory Services**

#### ***Investment Supervisory Services***

We offer investment supervision services, which are ongoing portfolio management services based on your individual goals, objectives, time horizon and risk tolerance. We will evaluate, analyze and recommend securities to clients for purchase; monitor performance and comparisons to benchmarks for performance of securities based on your investment objectives and financial goals. We may, at your request, provide additional services to you including assisting you in evaluating real estate or other non-securities investments. We will review performance with you and recommend alternatives when performance does not meet your objectives or if your objectives change.

We manage assets on a non-discretionary basis. This means that we contact you before making a trade in your account to seek your approval.

We tailor advisory services to your individual needs based on a questionnaire you complete at the onset of our relationship.

We have entered into subadvisory agreements whereby client assets may receive investment advice from a third party unaffiliated advisor. In such cases, we share in a portion of the collected advisory fee with the unaffiliated advisor. The unaffiliated advisor may have discretion over client assets, and in doing so will make purchases and sales of securities within customer accounts without first receiving client consent. The use of a subadvisor does not impact the fee charged to the client.

We manage client assets. As of December 31, 2010, our discretionary assets under management were \$0. As of December 31, 2010 our non-discretionary assets under management were \$74,780,195.

#### ***Referral to Third Party Advisors***

Another service we offer is the evaluation, review and ongoing monitoring of unaffiliated third party advisors. We enter into agreements with third party money managers offering a range of advisory services. We will solicit the services of the recommended third party money managers. We will not refer you to a money manager unless the money manager is registered or exempt from registration as an investment advisor in the client's state of residence. You may select a recommended money manager based on your needs. We are available to meet with the client on a continuous basis

### *Certificate of Deposit Account Registry Service*

We offer you the opportunity to invest in certificates of deposit through the Certificate of Deposit Account Registry Service ("CDARS").

## **Item 5      Fees and Compensation**

### *Fees for Investment Supervisory Services*

Fees for investment supervisory services are based on a percentage of the asset value of your account and are payable quarterly, in advance. Fee adjustments will occur on a pro-rata basis for new accounts, terminations, new deposits of cash or securities, and withdrawals of cash or securities. When additional assets are deposited into the client's account after inception of the applicable billing period, the fee payable to us with respect to additional contributions is prorated based on the number of days remaining in the billing period.

The asset value of a client's account for purposes of determining the fee payable to us is based on the market value of the client's account as of the last trading day of the quarter, as calculated by the custodian of your assets.

Our advisory fees do not cover charges or fees assessed by third parties or custodians for investments held in the account. Assets invested in shares of mutual funds or other investment companies ("funds") will be subject to additional fees and expenses, as set forth in the prospectus of those funds. Those fees are paid by the funds but ultimately borne by you. You should refer to the applicable mutual fund prospectus for information on applicable charges, expenses and fees. Our fees are negotiable. As a result, some of our clients may have differing fee schedules. The fees payable to us are generally debited from the client's account and noted on the statement received from IDGA, as well as the custodian.

Subject to the above, an annualized model client fee schedule follows:

#### Assets Under Management Annual Fee Schedule

First \$2.5 million 1.000% of assets

Next \$2.5 million 0.900% of assets

Next \$5 million 0.800% of assets

Next \$10 million 0.600% of assets

Over \$20 million 0.500% of assets

Fees may differ based on factors such as client type, asset class, pre-existing relationship, portfolio complexity and account size or other special circumstances or requirements. Some existing clients will pay higher or lower fees than new clients. Related accounts are aggregated for fee calculation purposes.

### ***Fees for Referral To Third Party Advisors***

For accounts referred to outside managers, the outside money manager receives compensation from the client pursuant to that manager's agreement with the client, and those fees are usually paid quarterly. In turn, the outside money manager then pays IDGA a portion of that fee as a referral or solicitation fee, not to exceed 40 basis points annually.

### ***Fees for Certificate of Deposit Account Registry Service***

When clients purchase a Certificate of Deposit through CDARs, we receive a fee in connection with the placement of funds. This fee is earned when the Client deposits funds into the bank, and paid quarterly thereafter. The fee reduces the interest rate and annual percentage yield earned on the certificate of deposit and is detailed to the client at the time of purchase. Clients could elect in a Certificate of Deposit without our assistance, and then would not pay a fee to us.

### ***How a client can terminate a contract for services or obtain a refund***

You may generally terminate its agreement at any time by giving us written notice. Written notice shall include Automated Customer Account Transfer papers that effectively close a custodian relationship without advance notice to us. Upon termination, you will receive a pro-rata refund representing the period from termination to quarter end within thirty days of receipt by IDGA of the notice to terminate.

## **Item 6 Performance-Based Fees and Side-by-Side Management**

We do not accept performance-based fees.

## **Item 7 Types of Clients**

We typically work with individuals, high net worth individuals, trusts, and estates.

We have no minimum account size.

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

We advise individual clients regarding the investment management of mutual funds, exchange-traded funds, variable annuities, variable life products, and separate account managers of equities and bonds. Under some circumstances, we may advise clients regarding other securities, such as individual stocks and closed-end funds. Investment strategies and policies as well as risks are included and described in the relevant prospectus and registration statement.

We use the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)

We use the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)

Our methods of analysis and investment strategies do not present any significant or unusual risks. However, every method of analysis has its own inherent risks.

Our primary investment strategies - Long Term Purchases and Short Term Purchases are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy.

## **Item 9      Disciplinary Information**

Neither the Firm nor any of our management persons have been involved in any events that are material to a client's or prospective client's evaluation of the Firm or the integrity of its management.

## **Item 10      Other Financial industry Activities and Affiliations**

Our principals are shareholders in Ian D. Gardenswartz & Associates, P.C., which is a traditional accounting firm specializing in tax, auditing and consulting services to a variety of clients including individuals, trusts, not-for-profit, real estate, manufacturing, professional service and agricultural clients. They spend 95-100% of their time in the activities of the accounting firm.

IDG Advisors is affiliated with Ian D. Gardenswartz & Associates, P.C., which is a traditional accounting firm specializing in tax, auditing and consulting services to a variety of clients including individuals, trusts, not-for-profit, real estate, manufacturing, professional service and agricultural clients.

These activities create a conflict of interest in that our Advisory Representatives have financial incentives to recommend additional products or services to you. We address these conflicts by doing the following:

We must disclose any potential or actual conflicts of interest when dealing with clients.

We are subject to the following specific obligations when dealing with clients:

- The duty to have a reasonable, independent basis for its investment advice;
- The duty to ensure that investment advice is suitable to meeting the client's individual objectives, needs, and circumstances; and,

- A duty to be loyal to clients.

You are under no obligation to use any services of Ian D. Gardenswartz & Associates, P.C.

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

Associated persons may buy or sell for their own accounts the same securities recommended to you. They may do so at the same time as they, or a related person, buy or sell the same securities for their own account. Associated persons seek to ensure that they do not personally benefit from the short-term market effects of their recommendations to you. We request information about all of our associate's transactions and monitor them for any wrongdoing.

Associated persons are aware of the rules regarding material non-public information and insider trading. Associated persons may also buy or sell a specific security for their own account based on personal investment considerations, which the Advisor does not deem appropriate to buy or sell for clients.

We have adopted a Code of Ethics to instruct its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm and our personnel owe a duty of loyalty, fairness and good faith to their clients, and the obligation 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 including general ethical principles, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code to any client or prospective Client upon request.

## **Item 12 Brokerage Practices**

### ***Schwab Institutional***

We may recommend that you establish brokerage accounts with the Schwab Institutional division of Charles Schwab & Co., Inc. (Schwab), a registered broker-dealer, member SIPC, to maintain custody of your assets and to effect trades for your accounts. We are independently owned and operated and not affiliated with Schwab. Schwab provides us with access to its institutional trading and custody services, which are typically not available to Schwab retail investors.

These services generally are available to independent investment advisors on an unsolicited basis, at no charge to them so long as a total of at least \$10 million of the advisor's clients' assets is maintained in accounts at Schwab Institutional. We are not required to further commit to Schwab any specific amount of business (assets in custody or trading). Schwab's services include brokerage, custody, research, and

access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

Schwab also makes available to us other products and services that benefit us but may not benefit your accounts. Some of these other products and services assist us in managing and administering your accounts. These include software and other technology that provide access to your account data (such as trade confirmations and account statements); facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts); provide research, pricing information and other market data; facilitate payment of our fees from your accounts; and assist with back-office functions, recordkeeping and client reporting. Many of these services generally may be used to service all or a substantial number of our accounts, including accounts not maintained at Schwab Institutional.

Schwab Institutional also makes available to us other services intended to help us manage and further develop our business enterprise. These services may include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing. In addition, Schwab may make available, arrange and/or pay for these types of services rendered to us by independent third parties. Schwab Institutional may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to us.

While as a fiduciary, we endeavor to act in your best interests. Our recommendation that you maintain their assets in accounts at Schwab may be based in part on the benefit to us of the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab. This may create a potential conflict of interest.

For our accounts maintained in its custody, Schwab generally does not charge separately for custody but is compensated by account holders through commissions or other transaction-related fees for securities trades that are executed through Schwab or that settle into Schwab accounts. We do not share in the commissions charged to clients.

### *Aggregation of Orders*

We may “bunch” buy or sell orders for two or more clients into a single large order, and place the bunched order with a single broker or dealer for execution. We are not obligated to place all transactions on a “bunched” basis. When determining whether to “bunch” orders, we rely on the judgment of the CCO as to what course of action is likely to be fair and in the best interests of the relevant accounts on an overall basis. That is, we seek to avoid putting any client account at an advantage or disadvantage compared to our other client accounts that are buying or selling the same security.

We permit block trading when the following conditions are met:

Orders of two or more clients may be bunched only if we have determined, on an individual basis that the securities order is:

1. In the best interests of each client participating in the order;
2. Consistent with our duty to obtain best execution; and
3. Consistent with the terms of the investment Advisory agreement of each participating client.

Where conducting a block trade, we will determine the accounts that will participate, and the specific allocations in advance of the transaction. If the entire order is filled, you will receive your portion of the allocation specified on the trade ticket. All allocations are prior to the close of business on trade date. Client accounts participating in the transaction will receive the weighted average price of the security and will incur a pro-rata share of the transaction cost.

If part of the order is unfilled, the allocation is based on a pro-rata share per client.

Our books and records separately reflect, for each client for whom an order is bunched, the securities held by, purchased, and sold for that client.

### **Item 13    Review of Accounts**

We continuously review the securities in every client's account. The accounts are reviewed quarterly. Accounts are reviewed by an investment committee composed of all owners of Capstone Investment Financial Group, Inc., who are Investment Advisor Representatives.

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

We do not pay anyone for client referrals for our accounts.

### **Item 15    Custody**

We have custody of client funds in that we deduct fees from your accounts. In some cases we have custody because Ian Gardenswartz, in his capacity as a client's CPA, has accepted responsibility as a trustee of a client's trust.

The custodian of your assets sends quarterly statements directly to you. You should carefully review those statements.

We also send performance statements to you, and we urge you to compare the account statements you receive from the custodian to those you receive from us.

### **Item 16    Investment Discretion**

We do not accept or request investment discretion.

## **Item 17     Voting Client Securities**

We do not vote proxies on your behalf. You retain that right unless you make other arrangements with the custodian of your assets. You will receive proxies or other solicitations directly from the custodian of your assets. You may contact us with questions about proxies.

## **Item 18     Financial Information**

We have no financial condition that is reasonably likely to impair our ability to meet contractual commitments to you.

## **Item 19     Requirements for State Registered Advisers**

Please read below to learn more about our the officers of our firm.

Ian D. Gardenswartz, Principal

Born: 1952

University of Denver, 1970-1974, graduated 1974 B.S./B.A. Accounting

Ian D. Gardenswartz & Associates, P.C., employed from 12/1974 to present

LaDonna M. Jurgensen, Principal

Born: 1945

University of Colorado, Boulder – 1963-1964

University of Colorado, Denver – 1973-1978, graduated 1978, B.S. Business Administration/Accounting

Ian D. Gardenswartz & Associates, P.C., employed from 02/1987 to present

Randy L. Kite, Principal

Born: 1953

University of Colorado, Boulder – 1971-1975, graduated 1975, B.S. Business Administration/Accounting

Ian D. Gardenswartz & Associates, P.C., employed from 01/1985 to present

Richard L. Merg, Principal

Born: 1954

University of Wisconsin, Eau Claire – 1972-1977, graduated 1977, B.B.A. Accounting

Ian D. Gardenswartz & Associates, P.C., employed from 11/1989 to present

Omnivest, Inc., Denver, CO – registered rep 11/2002 to present

Rem Bashari, Investment Adviser Representative and Chief Compliance Officer

Born: 1971

University of Nevada, Las Vegas- B.S. Accounting

Certified Public Accountant in CO

Ian D. Gardenswartz & Associates, P.C., employed from 12/2002 to present

## **Brochure Supplement**

Part 2B of Form ADV

Firm Brochure

IDG Advisors, LLC

6825 East Tennessee Ave., Suite 200

Denver, CO 80224

Phone: (303)399-5554

Date: March 31, 2011

### **Item 1      Cover Page**

This brochure supplement provides information about Ian Gardenswartz and Rem Bashari that supplements our Wrap fee brochure. Please contact us at (303)399-5554 if you did not receive IDG Advisors, LLC's brochure or if you have any questions about the contents of this supplement.

### **Item 2      Educational Background and Business Experience**

Ian D. Gardenswartz, Principal

Born: 1952

University of Denver, 1970-1974, graduated 1974 B.S./B.A. Accounting

Ian D. Gardenswartz & Associates, P.C., employed from 12/1974 to present

Rem Bashari, Investment Adviser Representative and Chief Compliance Officer

Born: 1971

University of Nevada, Las Vegas- B.S. Accounting

Certified Public Accountant in CO

Ian D. Gardenswartz & Associates, P.C., employed from 12/2002 to present

### **Item 3      Disciplinary Information**

None of our supervised persons is subject to any material legal or disciplinary event.

### **Item 4      Other Business Activities**

Please see item 10 of the Wrap fee brochure (attached) for more information about our Other Business Activities.

### **Item 5      Additional Compensation**

There are no such issues to be disclosed.

### **Item 6      Supervision**

The person responsible for supervision is Rem Bashari. He supervises the associates by monitoring their emails, reviewing paperwork they complete, meeting with them regularly, and enforcing the Firm's Written Supervisory Procedures and Code of Ethics. You may contact him at (303)399-5554 with any concerns.