

Part 2A of Form ADV: Firm *Brochure*

**Item 1 Cover Page**

**March 1, 2022**

**This brochure provides information about the qualifications and business practices of Dustin Blodgett Insight Capital, LLC, CRD No. 314558. If you have any questions about the contents of this brochure, please contact us at (925) 362-9571 and/or [dustin@insightcapmgmt.com](mailto:dustin@insightcapmgmt.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. Registration does not imply a certain level of skill or training.**

**Additional information about Dustin Blodgett Insight Capital, LLC, also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

**Our Name and Address:**

Dustin Blodgett Insight Capital, LLC  
d.b.a. Insight Capital Management  
2001 Crow Canyon Road, Suite 150  
San Ramon, CA 94583

**Our Contact Information:**

Dustin Blodgett, Managing Member, Chief Compliance Officer  
(925) 362-9571  
(925) 362-9577 (fax)  
[dustin@insightcapmgmt.com](mailto:dustin@insightcapmgmt.com)

**Item 2 Material Changes**

In this Item, Insight Capital Management is required to identify and discuss material changes since the last time this brochure was updated. There are no such material changes to identify or discuss.

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## **Item 4 Advisory Business**

**This item gives you information about our advisory business.**

Dustin Blodgett Insight Capital, LLC (d.b.a. Insight Capital Management) is an LLC established in 2021, and owned by Dustin Blodgett, President and Chief Compliance Officer. The firm is registered with the Securities and Exchange Commission ("SEC").

We provide investment management and financial planning services, which generally encompass advice concerning the following types of investments:

Stocks and bonds listed on an exchange or traded over-the counter, municipal bonds, foreign securities, warrants, corporate debt, commercial paper, variable insurance products, US government securities, options contracts on securities and commodities, futures contracts, limited partnerships investing in real estate and in oil and gas interests, annuities, certificates of deposit and mutual funds.

We may furnish investment supervisory services to you in the following manner (tailored to your individual needs and subject to any restrictions imposed by you and subject to your prior acceptance): We will monitor your situation periodically throughout the year and call you as necessary. We may receive discretionary authority from you to effect transactions. You will be billed for this type of service quarterly on the first day of the following quarter after the work has been performed.

Insight Capital Management tailors its advisory services to the individual needs of its clients by taking the time to understand clients' current financial condition, goals, risk tolerance, income, liquidity requirements, investment time horizon, and other information that is relevant to the management of clients' account(s). This information will then be used to make investment decisions and recommendations that reflect clients' individual needs and objectives on an initial and ongoing basis. Adviser's decisions and recommendations will allocate portions of clients' account(s) to various asset classes classified according to historical and projected risks and rates of return. For non-discretionary accounts, Insight Capital Management will review all such recommendations with clients, and clients will have the opportunity to accept or reject any recommendations. Clients are under no obligation to accept or implement any recommendation made by Insight Capital Management. For discretionary accounts, Insight Capital Management is granted a limited power of attorney to execute transactions without necessarily consulting client in advance. Clients may impose restrictions on investing in certain securities or types of securities so long as such restrictions may reasonably be implemented by Adviser.

We do not participate in any wrap fee programs.

### **Assets Under Management (as of 3/1/2022):**

As of March 1, 2022, Insight Capital Management manages \$210,667,620 in client assets on a discretionary basis and \$0 on a non-discretionary basis.

## **Item 5 Fees and Compensation**

**This item gives you information about the fees or other compensation we may receive from you or from others in connection with or as a result of giving you investment advice.**

Our fees range from 0% to 2% of the assets under management per annum, prorated quarterly and based on the managed assets at the end of the quarter just completed. Our fees are negotiable. We also charge a one-time financial planning fee for clients wishing to have this service. This fee is in addition to the asset-based fee for managing the accounts.

We can prepare a financial plan based on your specific needs and circumstance. Our fee to create a financial plan can be up to \$2,500. For the specific financial plan, fees are payable when the advice and plan is delivered to you.

You will be billed for investment supervisory services quarterly after the work has been performed on the first day of the following quarter. We do not bill any fees in advance. Our quoted fee will be based on the assets under management per annum, prorated quarterly and based on the managed assets at the end of the quarter.

We will deduct these fees from your account with the custodian if you have elected in writing for us to do so. The custodian will send you a quarterly statement showing all disbursements for your account, including the amount of the advisory fee. You should compare the account statements you receive from your account custodian(s) with those account statements you receive from us. It is not the responsibility of the custodian(s) to do this for you.

For a new client account that is opened during the quarter, we will bill the prorated amount for the time we spent managing your account as determined by the date the account was funded.

If you decide to terminate your relationship with Insight Capital Management, upon termination of our agreement to manage your accounts, we will bill the prorated amount of investment advisory fees from your account.

Lower or higher fees for comparable services may be available from other sources.

Either you or we may terminate a contract by written notice to the other delivered either personally or by mail.

We do not have any dollar minimums or other requirements for accepting investment advisory accounts.

Certain of our supervised persons are registered representatives of Arkadios Capital, LLC., an independent and unaffiliated broker-dealer and member of the Financial Industry Regulatory Authority. From time to time and when appropriate for the client, such supervised persons will earn an ordinary and customary commission from the sale of a security to a client in such capacity. This creates a conflict of interest, because such supervised persons have the potential to earn both commissions and advisory fee revenue from a client. The supervised persons address this potential conflict of interest by fully disclosing their relationships with Arkadios Capital, informing clients that they are under no obligation to purchase a security through them, and maintaining policies and procedures to reinforce our fiduciary duty to clients.

Some of our supervised persons are licensed to sell insurance products. This creates a conflict of interest in that our supervised persons have an incentive to recommend term life insurance since they will receive additional commission compensation as a result of such sales. We address this conflict of interest by fully disclosing our insurance agency relationships, but informing clients of the commission to be earned, and by advising clients that they are under no obligation to purchase any insurance product through our supervised persons or otherwise.

From time to time and when appropriate for the particular client, Insight Capital Management will recommend annuities as a part of its insurance offerings, to its clients from Great West, an insurance provider. We are compensated from this arrangement based on our standard fee schedule and are paid from the clients' investment accounts.

Great West does not provide us with any economic benefit nor any commissions. We do not charge our clients any additional fees nor do we foresee any conflicts of interest from this relationship. We do not receive any incentives from offering these products to our clients. For invoicing, Great West deducts our management fee from their annuity investment account. Our clients will incur brokerage and transaction fees from TD Ameritrade, and Great West based on the sale and annuity services offered by our firm.

Additionally, our Chief Compliance Officer reviews all investment advice given and all trading instructions given for you by us to watch for conflicts.

You are under no obligation to act on our recommendations. Furthermore, if you elect to act on any of

our recommendations, you are under no obligation to effect any transactions through any particular broker-dealer or through any associated person. You have the option to purchase investment products or insurance products that we recommend through any brokers or agents that you desire to use.

You will pay additional fees to others in connection with your investments, such as 12b-1 and other mutual fund expenses, brokerage and other transaction costs to the executing broker, custodial fees and so on. We do not receive any portion of any broker-dealer and/or custodial fees.

(Please also see Item 12 for additional information on our recommendation of brokers for you).

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

**This item discusses whether we charge any Performance-Based Fees and, if we do, the procedures we have set up to protect you.**

We do not charge Performance-Based Fees.

## **Item 7 Types of Clients**

**This item tells you about the types of clients to whom we give investment advice.**

We provide investment advice to the following types of clients: Individuals (including high net worth individuals), trusts, estates, foundations and charitable organizations, corporations or other business entities, pension and profit sharing plans.

We do not have any dollar minimums or other requirements for accepting investment advisory accounts.

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

**This item discusses the way we analyze securities investments, the investment strategies we use in suggesting investments for you and the risk of loss you may incur in making investments.**

We may use charting or fundamental analysis technical or cyclical analysis in looking at your accounts. One of the reasons that we utilize more than one type of analysis is to reduce risks induced by utilizing only one type of analysis (see discussion of risk below).

In general, the investment strategies we use to implement any investment advice that we give to you might include either long term purchases (securities held at least a year), or short-term investments (securities sold within a year).

Every type of investment analysis has its drawbacks and risks (see discussion of risk above). So does each type of investment strategy. Many of the risk factors discussed above apply to the various types of analysis and strategy.

There is always a risk of loss connected with investing. This is true whether you are investing in securities or in other types of investments. You, as an investor, should be prepared to accept this risk. One way to lessen it is to diversify your investments so that when one goes down another may rise. Part of our job as your investment advisor is to help you understand and manage this risk and to suggest ways for you to minimize this risk.

Below is a discussion of some types of risk that you may encounter in securities investing: Credit risk

The issuer of a security in which you invest, either directly or through a mutual fund, may default (may be unable to pay the principal or to make interest payments, or otherwise fulfill its obligations to investors) or in some cases may even decide to stop or reduce dividends.

If the issuer of your security falls out of favor or has its credit rating cut, the price could fall and you could lose money if you need to sell before maturity. If the issuer goes bankrupt, you could lose it all.

#### Economic risk

The state of the nation's or the world's economy may change drastically and that may well affect your investments.

#### Foreign exchange risk.

If you invest in a foreign security, it may go up in value but, when you sell it and attempt to turn it into cash from selling it you may find that a change in the rate for exchanging foreign funds into US dollars wipes out some or all of your profit.

#### Inflation Risk

Investors typically are locked into the interest rate paid on bonds. If inflation should rise dramatically, the after inflation return on bonds can be negatively affected. As a result, the bond would likely lose value in the open market.

#### Interest rate risk.

If you are investing to realize a certain amount of income and that income stream is dependent on the investment paying a certain interest rate, changing conditions may affect that interest rate and your income from that investment. If rates in the market rise, the underlying market value of existing bonds with a lower yield can decline. If you decide to sell a bond before maturity, this could result in a loss of principal value.

If you buy a bond or other fixed-income investment and interest rates subsequently rise, the price of your bond will probably fall. The longer the maturity of your bond, the bigger the drop. If you need to sell it before it matures, you could get back less than you paid. (The reverse is also true: if interest rates fall, the bond's price will rise.)

You can mitigate this risk by never buying a bond that matures before you need the money.

#### Liquidity risk.

The ability to sell a bond in the open market requires a buyer. If an investment has gained value since you bought it but you can't find a buyer for it when you want to sell it, it is illiquid at that point and you may not be able to liquidate it for current intrinsic value. Some bonds, from smaller issuers in particular, may not have broad appeal to investors, potentially driving down the price in the open market.

Many fixed-income investments don't trade in large numbers or very often. If you need to sell in a hurry, it might be at a fire sale price.

#### Management risk

If you are investing in mutual fund shares and the particular mutual fund is an "actively managed fund" then there is no guarantee that the investment manager's decisions regarding investment techniques, risk analysis and other matters will produce the desired results that you are seeking.

#### Market risk.

In making an investment you are usually betting that the market will behave in a way that will be to your advantage. That does not often hold true over a long period of time and it sometimes does not even hold true over a short period either.

#### Revenue Risk

Bonds that are dependent on revenue streams from specific projects such as toll roads and bridges may rely on the ability of the project to meet revenue projections (note that many municipal bonds are backed by the taxing authority of the issuer, rather than a revenue source as outlined here).

#### Volatility Risk

This is the measure of uncertainty in the future price of an asset. It is a measure of price fluctuations over time represented by annualized standard deviation. If an asset has rapid dramatic price swings, volatility will be high. If asset price is consistent and rarely changes, volatility will be low.

### **Item 9 Disciplinary Information**

**This item discusses any disciplinary events that have involved this firm.**

There have been no disciplinary problems involving our firm or any of our firm's personnel.

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

**This item discusses any other financial industry activities and associations of us or of our executive officers.**

Neither our firm nor any of its management persons has any relationship or arrangement that is material to its advisory business or to its clients with any related person listed below:

- i. investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or "hedge fund," and offshore fund)
- ii. other investment adviser or financial planner
- iii. futures commission merchant, commodity pool operator, or commodity trading advisor
- iv. banking or thrift institution
- v. accountant or accounting firm
- vi. lawyer or law firm
- vii. pension consultant
- viii. sponsor or syndicator of limited partnerships

Persons associated with us are also engaged in the businesses of giving investment advice and of selling fixed and variable insurance products, mutual funds and direct participation programs through Arkadios Capital, LLC, and Great West, an insurance company.

Certain of our supervised persons are registered representatives of Arkadios Capital, LLC. From time to time and when appropriate for the client, such supervised persons will earn an ordinary and customary commission from the sale of a security to a client in such capacity as registered representatives. This creates a conflict of interest, because such supervised persons have the potential to earn both commissions and advisory fee revenue from a client. The supervised persons address this conflict of interest by fully disclosing their relationships with Arkadios Capital, LLC, and informing clients that they are under no obligation to purchase a security through them.

From time to time and when appropriate for the particular client, Insight Capital Management will recommend annuities as a part of its insurance offerings to its clients from Great West, an insurance provider. We are compensated from this arrangement based on our standard fee schedule of 1% and are paid from the clients' investment accounts. Great West does not provide us with any economic benefit nor any commissions. We do not charge our clients any additional fees nor do we foresee any conflicts of interest from this relationship. We do not receive any incentives from offering these products to our clients.

You are under no obligation to act on our recommendations. Furthermore, if you elect to act on any of our recommendations, you are under no obligation to effect any transactions through us, through any

particular broker-dealer or through any associated person.

We do not select or recommend other investment advisers for you or other clients.

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

**This item refers to our Code of Ethics and how you may obtain a copy.**

We have a Code of Ethics with provisions requiring supervised persons to comply with all applicable Federal and state securities laws that apply to our dealings with you and our other clients.

All persons associated with us are considered to be “supervised persons”.

All access persons must report their personal securities transactions and holdings periodically to the Chief Compliance Officer. He is required to review these reports.

All supervised persons are required to report any violations of our Code of Ethics promptly to the Chief Compliance Officer (or to such other persons we designate, provided the Chief Compliance Officer also receives reports of all violations).

We will provide each supervised person with a copy of our Code of Ethics and any amendments. Each supervised person is required to sign a receipt for the Code of Ethics and any amendments received by them.

We will provide you, any of our clients or any prospective advisory client who desires a copy of our Code of Ethics with a copy of our code upon request.

We or persons associated with us may buy or sell the same securities that we recommend that you buy or sell. We or persons associated with us may also recommend that you trade securities that we already own. Any of these things may present a conflict of interest in that we or our associated persons may both receive investment advisory fees and securities earnings on our own. All such conflicts will be spelled out when we are working with you and you are under no obligation to act on our recommendations. Furthermore, if you elect to act on any of our recommendations, you are under no obligation to effect any transactions through us, through any particular broker-dealer or through any associated person.

If we or persons associated with us buy or sell the same securities that we also submit trades for you at about the same time that could possibly constitute a conflict of interest. We will not trade ahead of you or in any way that would affect your trades and all trades (yours and ours) will be reviewed by our Chief Compliance Officer to assure that you are not harmed.

Any material conflicts of interest regarding us, our representatives or any of our employees, which could be reasonably expected to impair the rendering of unbiased and objective advice to you, have been provided to you.

### **Item 12 Brokerage Practices**

**This item discusses the way we handle brokerage activities for you and for our other clients.**

We suggest discount brokers or custodians for brokerage or custodial services for you based upon the size of commission discounts when compared to full service brokers and our opinion of the relative quality of service, types of reports and other materials furnished to you and other clients and to us by the brokers, the services provided by the brokers or custodians to you and our other clients and to us, and the stability afforded by the recommended broker's or custodian's financial condition and general reputation in the investment community.

Insight Capital Management considers several factors when recommending a custodial broker-dealer for



client transactions and determining the reasonableness of such custodial broker-dealer's compensation. Such factors include the custodial broker-dealer's industry reputation and financial stability, service quality and responsiveness, execution price, speed and accuracy, reporting abilities, and general expertise. Assessing these factors as a whole allows Insight Capital Management to fulfil its duty to seek best execution for its clients' securities transactions. However, Insight Capital Management does not guarantee that the custodial broker-dealer recommended for client transactions will necessarily provide the best possible price, as price is not the sole factor considered when seeking best execution. After considering the factors above, Insight Capital Management recommends TD Ameritrade (now owned by Charles Schwab) as the custodial broker-dealer for client accounts.

Insight Capital Management does not receive research and other soft dollar benefits in connection with client securities transactions, which are known as "soft dollar benefits". However, the custodial broker-dealer(s) recommended by Insight Capital Management do provide certain products and services that are intended to directly benefit Insight Capital Management, clients, or both. Such products and services include (a) an online platform through which Insight Capital Management can monitor and review client accounts, (b) access to proprietary technology that allows for order entry, (c) duplicate statements for client accounts and confirmations for client transactions, (d) invitations to the custodial broker-dealer(s)' educational conferences, (e) practice management consulting, and (f) occasional business meals and entertainment. The receipt of these products and services creates a conflict of interest to the extent it causes Insight Capital Management to recommend TD Ameritrade (now owned by Charles Schwab) as opposed to a comparable broker-dealer. Insight Capital Management addresses this conflict of interest by fully disclosing it in this brochure, evaluating TD Ameritrade (now owned by Charles Schwab) based on the value and quality of its services as realized by clients, and by periodically evaluating alternative broker-dealers to recommend.

Insight Capital Management does not consider, in selecting or recommending custodial broker-dealers, whether Insight Capital Management or a related person receives client referrals from a custodial broker-dealer or third-party.

Insight Capital Management does not routinely recommend, request, or require that a client direct Insight Capital Management to execute transactions through a specified custodial broker-dealer other than TD Ameritrade (now owned by Charles Schwab).

Insight Capital Management retains the ability to aggregate the purchase and sale of securities for clients' accounts with the goal of seeking more efficient execution and more consistent results across accounts. Aggregated trading instructions will not be placed if it would result in increased administrative and other costs, custodial burdens, or other disadvantages. If client trades are aggregated by Insight Capital Management, such aggregation will be done so as to not disadvantage any client and to treat all clients as fairly and equally as possible.

### **Item 13 Review of Accounts**

**This item describes how we review your accounts and any reports you may receive.**

We will review your accounts on a quarterly basis at the least.

In addition to quarterly reports sent by custodians, we will provide quarterly reports to you on your various investments. All reports are reviewed in detail for accuracy and performance by a principal (at this point, by our Chief Compliance Officer), and if deemed necessary, we will contact you for discussion of relevant issues. You are encouraged to call at anytime if there are questions or concerns.

GreatWest will send our client's a statement each quarter. Each statement may also include the clients' investment in mutual funds through sub-accounts with an annuity company.

You will also receive reports from the custodians of your securities.

You should compare the account statements you receive from your account custodian(s) with those

account statements you receive from us. It is not the responsibility of the custodian(s) to do this for you.

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

**This item discusses any compensation we may receive for referring you to other investment advisers or any other compensation we may receive from persons other than yourself for giving you investment advice.**

We do not currently compensate anyone for referrals of clients to us.

We do not currently receive compensation from anyone for referrals of clients to them.

#### **Item 15 Custody**

**This item reveals any types of custody we may have or may accept in the future.**

For clients that do not have their fees deducted directly from their account(s) and have not provided Insight Capital Management with any standing letters of authorization to distribute funds from their account(s), Insight Capital Management will not have any custody of client funds or securities. For clients that have their fees deducted directly from their account(s) or that have provided Insight Capital Management with discretion as to amount and timing of disbursements pursuant to a standing letter of authorization to disburse funds from their account(s), Insight Capital Management will typically be deemed to have limited custody over such clients' funds or securities pursuant to the SEC's custody rule and subsequent guidance thereto. At no time will Insight Capital Management accept full custody of client funds or securities in the capacity of a custodial broker-dealer, and at all times client accounts will be held by a third-party qualified custodian as described in Item 12, above.

If a client receives account statements from both the custodial broker-dealer and Insight Capital Management or a third-party report provider, client is urged to compare such account statements and advise Insight Capital Management of any discrepancies between them.

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

**This item discusses any types of investment discretion we may have or may accept to make securities trades for you.**

We generally accept a written limited power of attorney from you to make discretionary trades for you. We would select the securities to be bought or sold and the amount of securities to be bought or sold for you, in accordance with your wishes. If we have not obtained your written authorization to manage your accounts or to make discretionary trades for you we will each time obtain your permission to make a trade(s).

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

**This item discusses our policy regarding voting proxies or other matters concerning your securities.**

We do not vote your client securities or proxies.

Usually the transfer agent of the company issuing the security will send proxy materials or other solicitations directly to you. In some cases, they will send those materials to your custodial broker. If you do not receive these materials directly and wish to do so, you can contact the issuer's investor services department or the custodial broker to request that information. If you need help in obtaining these materials or have any questions, please contact us and we will be happy to assist you in obtaining those

materials or answers to those questions.

### **Item 18 Financial Information**

**This item shows any financial information we must provide to you.**

We do not bill any fees in advance. We do not require the prepayment of fees of more than \$ 1,200 per client and for six months or more in advance.

We do not have any custody of client funds or securities.

There are no financial conditions that would keep us from meeting any financial commitment to you or any other factors such as a bankruptcy petition that would require us to provide any financial information under this item.