

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page



Oracle Investment Research

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This brochure provides information about the qualifications and business practices of Oracle Investment Research. If you have any questions about the contents of this brochure, please contact us 253-200-1849 or info@oracleinvestmentresearch.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 Oracle Investment Research also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

Not Applicable.

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Oracle Investment Research (“the Adviser”) provides investment advisory services to private clients on a discretionary basis. The advisory services include, among other things, providing advice regarding asset allocation and the selection of investments. Account management is guided by the stated objectives of the client.

In addition, the Adviser considers the client’s risk profile and financial status prior to making any recommendations. The assets are held in custody at Fidelity Investments, one of the nation’s largest brokerage firms.

In addition, the Adviser is also the investment adviser to The Oracle Family of Funds, an Ohio statutory business trust, registered with the Securities and Exchange Commission (“SEC”) as an open-end management investment company. As of this report, The Oracle Mutual Fund is the only mutual fund series in the trust family.

The Oracle Mutual Fund operates under the Investment Act of 1940. For more information on the Oracle Mutual Fund, please visit the Fund’s website at www.oraclemutualfund.com

Pursuant to the terms set forth in its Management Agreement, the Adviser receives an annual fee for managing the Oracle Mutual Fund of .75% of the fund’s assets annually.

The primary investment adviser and Principal of Oracle Investment Research is Mr. Laurence Isaac Balter. Mr. Balter owns 100% of the firm. Mr. Balter received his B.Sc. degree in Physics and Mathematics from the University of California, San Diego, finding his calling in finance rather than science. His quest into complex financial analysis and portfolio theory led him to establish Oracle Investment Research in 2010. He is also a published author. During the years 1999 through 2010; Mr. Balter was a research analyst and portfolio manager for Wailea Capital Group. He was also a registered principal at LPL Financial from 2003-2010. From 1992-1999, Mr. Balter was the Director of Operations and Research at Balter Worldwide Corp. Prior to that, he was a research and financial analyst at a major US airline (1991-1992). He has over 20 years of investment experience.

Oracle Investment Research specializes in quantitative investment strategies. Its Adviser studies large amounts of market and financial data which is sifted through a proprietary screening process developed by Mr. Balter. These results are studied in order to determine appropriate candidates for investment.

Management fees are paid quarterly and are negotiable based on complexity of each client. Fees do not to exceed 2.50% per annum of the client's entire account balance.

Fees are due on the fifteenth day of the calendar quarter, and may be billed directly to the client or deducted from the advisory account automatically depending on the contractual relationship with client.

Fees are based on the client's account asset value as of the last business day of the previous Calendar quarter.

The Adviser does not generate fees from trade commissions or sales of products. The only revenue generated by the firm is based on the asset value of the account.

Important disclosure:

Private clients who invest in any of the mutual funds that we directly manage are credited the management fee, less the internal expense charged by Fidelity the firm's custodian.

We do not "double-dip".

For example:

Suppose a client is charged 1.50% annually on \$500,000 invested in a diversified portfolio which may include stocks, bonds or other mutual funds in their Fidelity account. Furthermore, let us suppose that \$100,000 of this portfolio is invested in the Oracle Mutual Fund as part of their overall asset allocation of which the firm as the Fund's Investment Advisor receives an advisory fee of .75% annual fee from all fund investors.

Here is how the math works in this example:

Client portfolio	\$500,000	Annual Fee @ 1.50%	-\$6,500
Amount of portfolio in Oracle Mutual Fund	\$100,000	Credit of annual management fee @ 0.75%	+\$750
Fidelity's internal mutual fund charge		@ .40%	-\$400
Annual Fee			-\$6,150
<i>Effective Annual Rate</i>			<i>1.20%</i>

We utilize Advent® software within Fidelity accounts to keep track of these credits and debits and it is automatically calculated in the client fee reports.

Please note: All brokerage firms charge internal fees to all mutual fund companies. It may be less expensive to hold the Oracle Mutual Fund outside of a Fidelity account and directly with the Fund's custodian bank. However, in some cases this difference may be offset for the convenience of having all assets under one statement for consolidation and trading purposes.

Performance Based Fee

The firm does not have a performance based fee compensation program.

Types of Clients

The firm generally accepts new clients with at least \$5 Million or more in combined liquid assets.

The firm focuses on taking care of its existing client base that has been with it for many years without sacrificing quality for the sake of quantity.

As investment managers, the firm has established the Oracle Mutual Fund as a convenient way for new investors to invest at much smaller levels.

Investment Strategy

Quantitative investing applies mathematical models that would have worked during the uncertain past, enabling investors to position themselves for a high probability of success in an uncertain future. It is not day trading or program trading, but rather a rules based strategy which, when applied correctly, increases the investor's likelihood of success.

Markets tend to overvalue a company when its short-term outlook is rosy and undervalue it when times are discouraging. This cycle of exaggeration creates wide stock swings around a company's actual business value. This behavior produces a never-ending series of investment opportunities for which we seek to take advantage. The firm believes that computers, when given the appropriate market and financial data, can sift through vast amounts of data far better and faster than any human. Removing emotions and biases from the process can lead to superior investing results.

The quantitative investment process ranks securities on various metrics and then processes this information on a daily basis. We seek undervalued investments, dividend paying equities, growth, value and momentum oriented securities that are poised to perform.

It is this unemotional attachment and rational investment process that makes the Firm unique to other investment firms.

Disciplinary Information

Not applicable.

Other Financial Industry Activities and Affiliations

Not applicable.

Code of Ethics

A copy of the code of ethics is available upon request.

The policies and procedures for personal trading are such that client trades are placed prior to any advisor personal transactions.

Brokerage Practices

The has entered into a “soft-dollar” arrangement with Fidelity Investments® in connection with their providing Oracle Investment Research a Bloomberg® terminal for high quality research and news.

The Bloomberg® terminal is a highly sophisticated research tool used by over 300,000 professional money managers. Bloomberg® maintains a news service, equity and bond research service, multiple brokerage and research analyst access, wholesale bond inventory, charting, back testing and screening platform vital to our investment process. As a result, the Firm can access virtually any research document, analyst report, target price, upgrade and downgrade of securities and values around the globe.

We believe the value of this terminal gives it a significant advantage over other investment advisors.

As a result, the Firm has agreed that its private clients be charged \$13.95 per trade at Fidelity, in exchange for Fidelity to pay the \$20,000 annual subscription fee for the Bloomberg® terminal.

Although this cost to the Firm’s private clients is \$6 per trade more than without the terminal, it is the Firm’s belief that the advantage of having this research tool far outweighs the additional cost. The \$13.95 per trade fee is well below what the Firms’ clients previously paid at its prior custodian, LPL Financial.

The Firm does not believe that it is sacrificing best execution for client trades for several reasons. First, as affirmed by The Wall Street Journal and Barron’s magazine, Fidelity offers one of the very best execution services amongst all brokerage firms receiving a 5 star rating. Second, by receiving real time data along with high quality research the Firm gets a pricing and research advantage that was previously unavailable.

Review of Accounts

The Firm's Principal personally reviews the accounts with each client on a quarterly basis or at least via teleconference.

However, most accounts are reviewed more frequently for allocation and trading purposes.

News events, trading opportunities and client communications can also all trigger an account review.

Client Referrals

The Firm does not compensate any individual or firm for referrals.

Custody

The Firm does not custody any client assets. All accounts are held at third party custodians such as Fidelity Investments®.

Investment Discretion

All investment allocations, trades and strategies are conducted on a discretionary basis. At times, some clients would prefer to be consulted prior to changes. This is on an individually negotiated basis.

Voting Client Securities

Clients receive proxy information and voting instructions from the associated securities. However, some clients defer the decision to the adviser to act on their behalf.

For those that choose the Firm to do so, it employs a decision making process that takes into account the best interest of our clients which is set forth in the Firm's Proxy Voting policies and Procedures.

Financial Information

The firm does not charge for our services in advance.

Requirements for State-Registered Advisers

Oracle Investment Research acts as Investment Adviser for The Oracle Mutual Fund, an open end registered investment company pursuant to the Investment Company Act of 1940. As determined by the SEC, the Firm is not required to register in individual states.

