

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page



Oracle Investment Research

182 Island Blvd. FI

Fox Island, WA 98333

Tel 253-200-1849

www.oracleinvestmentresearch.com

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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 lb@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.

Item 3 Table of Contents

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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.

Item 5 Fees and Compensation

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 first day after 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 by the firm's custodian.

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 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>

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 your 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.

Item 12 Brokerage Practices

Brokerage Practices

We participate in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), a FINRA/SIPC/NFA member. TD Ameritrade, Inc. is an independent and unaffiliated SEC-registered broker-dealer.

TD Ameritrade offers to independently registered investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. We receive some benefits from TD Ameritrade through its participation in this platform including a program entitled "Soft Dollar Program".

A "Soft Dollar Program" is used to offset third party research expenses with trading commissions.

Oracle Investment Research incorporates the Bloomberg Terminal Research service as part of this program.

As disclosed above, we participate in TD Ameritrade's institutional customer program and we may recommend TD Ameritrade to Clients for custody and brokerage services. There is no direct link between our participation in the program and the investment advice we give to our Clients, although we receive economic benefits through our participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate Client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to Client accounts); the ability to have advisory fees deducted directly from Client accounts; access to an electronic communications network for Client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Advisor's related persons. Some of the products and services made available by TD Ameritrade through the program may benefit us but may not benefit our Client accounts. These products or services may assist us in managing and administering Client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help us manage and further develop our business enterprise.

At this time clients do not pay commissions or transaction fees that are higher than those obtainable from other brokers in return for those products and services;

As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. Clients should be aware, however, that the receipt of economic benefits by us or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of TD Ameritrade for custody and brokerage services.

Generally, in addition to a broker's ability to provide "best execution," we may also 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 those services or products with "soft dollars." Because many of the services or products could be considered to provide a benefit to the firm, and because the "soft dollars" used to acquire them are client assets, the firm could be considered to have a conflict of interest in allocating client brokerage business: it could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation the firm might otherwise be able to negotiate. In addition, the firm 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 and services.

The firm'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), the firm will make a good faith determination that the amount of commission 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 to be paid to TD Ameritrade is reasonable in relation to the value of all the brokerage and research products and services provided by TD Ameritrade. 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 our performance of our overall responsibilities to all of our clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer 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.

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.

There is no direct link between our participation in the soft dollar program and the investment advice we give to Clients.

As part of our participation in the program, we also may receive discounts on compliance, marketing, technology, and practice management products or services provided to advisor by third party vendors. This includes the “Soft Dollar Program” as explained in Item 12.

The benefits received by us do not depend on the amount of brokerage transactions directed to TD Ameritrade.

Custody

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

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.