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February 20, 2015

Firm Brochure

Part 2A

Item 1: Cover Page: This brochure provides information about the qualifications and business practices of Prudent Investors Network, Inc. If you have any questions about the contents of this brochure, please contact us at 760-597-9255. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority.

Additional information about Prudent Investors Network, Inc. ("PIN" hereafter) is available on the SEC's website at www.adviserinfo.sec.gov.

PIN is a Registered Investment Advisor; such registration does not imply a certain level of skill or training of Advisory Representatives of PIN.

Item 2: Material Changes: None

Item 3: Table of Contents

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Item 4: ADVISORY BUSINESS

PIN specializes in investment management and retirement planning for fiduciaries and individuals. Though PIN was incorporated in 2003, the firm's principals, Lee H. Anke and Ted H. Ong, have been business partners since 1987 and have been investment professionals since 1977 and 1982, respectively. Jared Ong joined PIN in 2010. They are Advisory Representatives of PIN and are investment advisors specializing in servicing the needs of public and private fiduciaries and all other investors to whom control of down-market risk is crucial. Lee Anke and Ted Ong have passed the Registered Guardian exam under the Center for Fiduciary Certification and Mr. Anke has also passed the California Certified Fiduciary exam. None of the principals serve as professional fiduciaries.

PIN's clients' accounts are placed in one of several managed portfolios depending on the objectives of the clients:

MinRisk: This portfolio is constructed using mutual funds and other investment vehicles designed to control downside risk. It is targeted to experience the lowest risk of loss of PIN's portfolios – roughly equivalent to the risk levels of intermediate-term bonds. This portfolio is appropriate for shorter-term investors, perhaps as short as 3 years.

Conservative: This portfolio is constructed using mutual funds and other investment vehicles designed to control downside risk. It is targeted at generating returns comparable to those of the average Morningstar Moderate Allocation fund while exposing investor monies to substantially less risk of loss. It is appropriate for investors with a 3+ year investment time horizon.

Moderate: This portfolio is constructed using mutual funds and other investment vehicles designed to control downside risk. It is targeted to have about the same risk, but higher returns than that of the average Morningstar Moderate Allocation fund. It is appropriate for investors with a 5+ year investment time horizon.

Conservative ETF: This portfolio is targeted to generate comparable returns to the U.S. ETF Moderate Allocation Category, but with less risk of loss. The purpose of this portfolio is to invest in assets that are available on the U.S. securities exchanges – it does not, therefore, invest in mutual funds. Because ETFs are generally more volatile than mutual funds, the Conservative ETF Portfolio will typically experience greater risk than PIN's Conservative Portfolio discussed above.

Conservative NTF: This portfolio is targeted at accounts from \$25,000 to \$100,000. It shares the objectives of the Conservative (mutual fund) Portfolio, but is constructed using non-transaction fee mutual funds so the returns will not be diluted by transaction fees. The offsetting factor is that non-transaction fee funds represent a very small subset of the universe of mutual funds, which could offset some of the advantage of avoiding transaction fees. PIN believes that, for small accounts whose returns are more heavily impacted by transaction fees, this portfolio offers a net benefit.

U50: This plan employs only one balanced fund selected using the same rigorous tools as the above portfolios. It is practical for the smallest of accounts and (with just one asset) is designed to minimize transaction fees for accounts less than \$100,000.

If clients or their circumstances require us to restrict their accounts to certain securities or types of securities, PIN will attempt to accommodate their request. However, each holding within the PIN portfolio plays an important role in the effective diversification of the portfolio, so performance of restricted portfolios may be adversely affected.

PIN also provides expert testimony services related to suitability of investments under various state Probate Codes and compliance with the Uniform Prudent Investor Act.

PIN does not participate in wrap fee programs. PIN produces a free newsletter for its clients.

As of December 31, 2014, PIN managed approximately \$107,000,000 in client assets on a discretionary basis.

Item 5: FEES AND COMPENSATION

Managed Accounts: PIN does not charge commissions. Purchases are executed on a net-asset-value (NAV, or *no-load*) basis. All assets (including cash) held in accounts under a management contract are charged a monthly management fee, one month in advance. Monthly fees are normally deducted from the accounts by the custodian and sent to PIN early each month. However, clients may choose to send a check for the monthly fee instead. Accounts opened in the middle of a month will be charged a pro-rated fee. If an advisory contract is terminated mid-month, the client may request, in writing, a refund of fees. The refund will be calculated as follows: the amount pre-billed is multiplied by the number of days remaining in the month divided by the total number of days in the month. Partial withdrawals during the month will not result in a credit on management fees.

Calculation of the management fee rate is based on a tiered fee structure using the combined value of all PIN managed accounts within a client's household. The tier structure is as follows:

<u>Combined Value of Accounts Managed by PIN</u>			<u>Annual Fee</u>
\$50,000	to	99,999	1.50%
100,000	to	249,999	1.40%
250,000	to	499,999	1.30%
500,000	to	999,999	1.14%
1,000,000	to	1,999,999	.99%
2,000,000	and above		.80%

An example of householding would be a client for whom PIN manages two accounts -- a joint account worth \$225,000 and an IRA worth \$50,000. Individually, they would be subject to fee rates of 1.4% and 1.5% respectively. Under householding, however, the combined value of the two accounts would be \$275,000, so both would be subject to a flat fee rate of only 1.3%. For large accounts placed under PIN's management, fees may be negotiable.

Accounts invested in the U50 portfolio are charged an annual management fee of 0.50% for reporting, servicing, and managing the account. That is below the rates of our fully managed accounts, so they are not covered by the tier structure shown above and there is no householding of these smaller accounts.

As noted, PIN's managed asset account eliminates all commissions on purchases and sales of securities. However, in addition to PIN's monthly investment management fee, at the time of purchase, clients may incur transaction fees (typically \$16.50 per transaction-fee fund) imposed by the broker/dealer (this does not apply to the NTF portfolio). Also, clients will incur the usual charges imposed directly at the mutual fund level (e.g., fund advisory fees and other fund expenses charged to all investors in a mutual fund), which are described in each fund's prospectus. PIN attempts to use institutional funds where possible to minimize all such fees. Where they can't be avoided, PIN may receive ongoing 12(b)(1) trailing commission compensation directly from the mutual fund company. A client may invest in a mutual fund directly without the services of PIN. In that case, the client would not receive the services PIN provides that are designed to assist the client in minimizing the risk of loss and determining which

mutual funds are most appropriate to the client's financial condition and objectives. Clients should review both the fees charged by the funds and the fees charged by PIN to fully understand the total amount of fees to be paid. Lower fees for comparable services may be available from other sources. The client should consider carefully the value added by PIN's management before investing. Historical performance is available on request. Past performance is not, of course, a guarantee of future results.

Accounts Not Under a Management Contract: Assets held by a client in PIN accounts that are not under a management contract are not charged a management fee. If specific investment advisory advice for such accounts is requested, it may be billed on an hourly basis. Clients who choose to engage PIN to buy or sell securities will be charged a percentage commission based on the value of the transaction. (Rates vary depending on the nature of the security, i.e., stocks, bonds, mutual funds, etc.) Securities are offered through Ceros Financial Services, which may charge brokerage commissions and will pay a portion of the commissions to PIN as applicable. The brokerage commissions charged by Ceros Financial Services may be higher or lower than those charged by other broker-dealers. As stated above, PIN may also receive additional, ongoing 12(b)(1) trailing commission compensation directly from the mutual fund company. Lower fees for comparable services may be available from other sources.

Consulting and Other Services: PIN also provides expert testimony services, consulting and charting services at a rate of \$350 per hour. An estimate for total hours will be determined before the work begins and 50% of the estimated fee may be due upon signing the advisory agreement. If the work expands beyond what was initially anticipated, PIN will consult with the client before proceeding. An additional retainer may be requested in such cases. The balance of the fee (based on actual hours) is due upon presentation of the plan to the client. An agreement may be canceled at any time by either party for any reason upon receipt of written notice. Upon termination, any prepaid, unearned fees will be refunded and any earned, unpaid fees will be due and payable. Additionally, research services may be provided at a charge of \$125 per hour. These fees may be negotiable.

Item 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT

PIN does not manage performance-based fee accounts, thus there is no side-by-side management (when a person manages accounts that are charged a performance-based fee and another type of fee such as hourly or flat fee.)

Item 7: TYPES OF CLIENTS

PIN's clients include public guardians, public and private professional fiduciaries, family fiduciaries, conservators, individuals, trustees of family trusts and retirement plans, pooled investors and businesses.

Item 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Through completion by the client of a questionnaire (and possible follow up questions) in which goals and objectives based on a client's particular circumstances are established, PIN prepares and submits to the client, an Investment Plan that includes a written investment policy and investment recommendation. This is standard for fiduciary accounts, but may be done for any client who desires it. Questionnaires may be obtained on PIN's website, www.PrudentNetwork.com, under *Questionnaires and Forms*. The questionnaire includes information related to annual income and expenses, life expectancy, and tax status. For all clients, suitability information is acquired in the account application, including investment objectives, risk tolerance and investment knowledge.

PIN will create a portfolio including (but not necessarily limited to) no-load, load-waived, or front-load mutual funds. All mutual funds (including "front-load" funds) are acquired at Net Asset Value (meaning

without the front load) in fee-based, managed accounts. Other types of investments may include individual stocks, ETFs, bonds, managed futures, hedging strategies, and other investments suitable for diversification and management of risk in securities accounts. PIN will allocate the client's assets among various investments taking into consideration the overall management style recommended to the client. The mutual funds will be selected on the basis of any or all of the following criteria: the fund's effectiveness in diversifying the overall portfolio (non-correlation with other assets in the portfolio), the fund's performance history (in terms of *risk* as well as returns); manager tenure; the industry sector in which the fund invests; the fund's investment objectives; the fund's management style and philosophy; and the fund's fee structure. Portfolio weighting between funds and market sectors will be determined by the objectives of the portfolio, including risk averseness. Clients will retain individual ownership of all securities.

To protect portfolios in the face of changing markets, PIN may participate in options, short-term trading (selling securities within 30 days of purchase), inverse funds and short sales (though the latter would not be common).

A majority of PIN's managed accounts are invested in the PIN Conservative Portfolio, which is designed to maximize the inflation-adjusted "total return" of the portfolio at very conservative levels of investment risk. "Total return" includes both capital appreciation and current income. Traditionally, maximizing current income has come at the expense of total return. For that reason, the Uniform Prudent Investor Act (UPIA) emphasizes *total return* over the traditional pursuit of maximum "income." PIN notes that the Uniform Principal and Income Act (UPAIA) has been adopted in most states in conjunction with the UPIA, enabling income beneficiaries of "income-only" trusts to receive a portion of the capital gains in addition to the income. To ensure that the portfolio maintains real purchasing power, PIN's portfolios are carefully diversified to maximize total return while monitoring and managing portfolio-level risk at prudent levels. This enables PIN to avoid over emphasis on current income.

PIN's investment management discipline is based in Modern Portfolio Theory, a theory of investing that has won three individuals Nobel Prizes over the past 50 years. Its most basic principle is that diversification reduces the risk of loss at the portfolio level. It has shown that by incorporating non-correlating assets into a portfolio, total returns may be maintained while reducing the risk of loss at the portfolio level. Effective diversification can reduce the risk of loss at the portfolio level despite the fact that the underlying assets may be quite volatile.

Investing involves substantial risks, including the potential for complete loss of principal plus other losses and may not be suitable for many members of the public. Investments, unlike savings and checking accounts at a bank, are not insured by the government to protect against market losses.

Please be advised that all investment programs have certain risks that are borne by you, the investor. Our investment approach constantly keeps the risk of loss in mind. Below are listed various risks investors face:

- **Interest-rate Risk:** Fluctuations in interest rates may cause asset prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline. Investments with high dividends and interest sensitive positions such as real estate often react similarly.
- **Market Risk:** The price of a security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.

- **Inflation Risk:** When any type of inflation is present, a dollar next year will not buy as much as a dollar now, because purchasing power is eroding at the rate of inflation. Bonds and other fixed-dollar investments may decline in value as interest rates rise in an inflationary environment.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (e.g., old bonds that may have yielded 5% or 10% are maturing today and the proceeds may have to be invested at much lower yields). This primarily relates to fixed-income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who typically buy electricity no matter what the economic environment is like.

Item 9: DISCIPLINARY INFORMATION

There have been no disciplinary actions taken against Prudent Investors Network or its advisory representatives.

Item 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Ted Ong is a registered representative of Ceros Financial Services, Inc., an SEC-registered, FINRA member broker-dealer. Securities are offered through Ceros; Ceros is not affiliated with PIN.

Item 11: CODE OF ETHICS, PARTICIPATION OF INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

All representatives of PIN have agreed to abide by the "fiduciary standard," a Code of Ethics that requires the advisor to act only in the *best interest* of the client (as opposed to the suitability standard that requires only that an advisor present to his clients assets that are "suitable" under the circumstances). The fiduciary standard includes observing high standards of honesty, trustworthiness, integrity and fairness; acting in an ethical manner and with reasonable care and diligence in dealing with the public, clients, prospective clients, representatives, employees and other investment advisors; and, continually striving to maintain and improve self-competence.

While these individuals endeavor at all times to put the interest of the clients first as part of PIN's fiduciary duty, clients should be aware that the receipt of additional compensation (see 12(b)(1) fees above, for example) creates a potential conflict of interest and may affect the judgment of these individuals when making recommendations.

As these situations may represent a conflict of interest, PIN has established the following restrictions in order to ensure its fiduciary responsibilities:

- No director, officer or employee of PIN shall buy or sell securities for their personal portfolio(s) where their decision is substantially derived, in whole or in part, by reason of his or her employment unless the information is also available to the investment public on reasonable inquiry. No person of PIN shall prefer his or her own interest to that of the advisory client.
- PIN maintains a list of securities transactions by all associates, staff and consultants. These transactions are reviewed quarterly by an appropriate officer/individual of PIN.

- PIN promotes the unrestricted right of the client to decline to implement any advice rendered except in situations where PIN is granted discretionary authority of the client's account.
- PIN requires that all persons associated with its advisory practice must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
- Any individual not in observance of the above may be subject to termination.

PIN will provide a copy of its code of ethics to any client or prospective client upon request. A copy of PIN's code of ethics can be found on their website, www.PrudentNetwork.com, under *Disclosures*.

Item 12: BROKERAGE PRACTICES

PIN-directed Brokerage: PIN uses Ceros Financial Services (CFS) as the broker for its managed accounts and for ETFs, individual stocks and bonds. Ted Ong is registered as representative of CFS; PIN and CFS are not affiliated. CFS is required to supervise the securities trading activities of its representatives.

PIN has evaluated CFS and believes that CFS will provide PIN's clients with a superior blend of execution services, commission costs and professionalism that will assist PIN in obtaining best execution for transactions. However, by directing brokerage, PIN may be unable to achieve most favorable execution of client transactions and this practice may cost clients more money.

Client-directed Brokerage: PIN does make a specific exception in its brokerage practices. A client may direct brokerage if the following conditions are met:

- The client has an existing retirement plan at a different brokerage that cannot be moved
 - ✓ PIN agrees to manage the assets and The other firm permits PIN to direct trades in the client's account
 - ✓ The other firm permits oversight of that trading by CFS
 - ✓ Ceros' Compliance Officer approves the arrangement

Clients should understand that by directing brokerage, they may pay higher or lower brokerage commissions or transaction fees because the costs of the client's brokerage firm will apply. When securities (other than mutual funds) are traded, PIN may not be able to aggregate orders to reduce transaction costs, or the client may receive less-favorable prices. Also, the client's brokerage firm may not allow trading in some securities PIN can acquire at CFS, forcing substitutions that may impact the performance of the client's portfolio.

Aggregating Orders: A vast majority of the trades placed by PIN are in mutual funds, which receive end-of-day pricing. Placing block (or aggregate) trades is only possible when placing equity trades where intra-day pricing changes rapidly. When PIN does place trades for equities totaling more than 10,000 shares (i.e., for all clients combined), PIN will aggregate the trades in order to get the best possible pricing for all of its clients.

PIN does not accept research or soft dollar benefits.

Item 13: REVIEW OF ACCOUNTS

Clients receive a monthly brokerage statement (or quarterly, if there is no activity) produced by the custodian of the account. These monthly statements are mailed to the address of record unless the client has 1) requested that they obtain statements electronically, or 2) has provided written authorization to send them elsewhere. Fiduciary clients, as well as individual investors, may request an annual Compliance Review, a written report that describes the account performance against its

objectives. The Compliance Review is sent electronically as a PDF file or a hard copy is mailed, depending on the client's preference.

Item 14: CLIENT REFERRALS

PIN welcomes client referrals; however, PIN does not provide financial compensation to clients who make referrals.

Item 15: CUSTODY

PIN's clients receive monthly statements (or quarterly, if there is no activity) mailed directly from the custodian, such as National Financial Services or mutual fund companies. Some clients choose to access their statements electronically. Clients should carefully review their statements.

Item 16: INVESTMENT DISCRETION

PIN accepts discretionary authority to manage accounts on behalf of clients. This discretionary authority is included in the standard PIN Management Agreement that must be signed by the client for all discretionary managed accounts. Clients may change/amend these limitations as required; however, such amendments must be noted on the Management Agreement. PIN retains the right to decline the management of an account if it finds the limitations unworkable with its management discipline. Clients can elect to open non-discretionary accounts for which PIN will obtain client approval before trades are executed. Use of discretion shall be restricted to management of the assets within the account for the sole purpose of achieving the stated objectives. No discretionary authority is sought or to be granted for distribution of either funds or assets from the account. The authority for such distributions shall be vested exclusively in the legal account owner or as directed by court order.

Item 17: VOTING CLIENT SECURITIES

PIN does not vote client securities.

Item 18: FINANCIAL INFORMATION

PIN does not require or solicit prepayment of fees six months or more in advance, therefore, balance sheets are not required for this brochure.



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February 20, 2015

Part 2B – Brochure Supplement

Item 1: Cover Page

The following brochure supplements provide information about **Ted H. Ong, Lee H. Anke, and Jared Ong** that supplements the Prudent Investors Network, Inc. (PIN) Firm Brochure. You should have received a copy of the Firm Brochure. Please contact Elisa Williamson if you did not receive PIN's Firm Brochure or if you have any questions about the contents of this supplement.

PIN is an SEC-registered investment advisor. However, one of the principal executives is separately licensed as a Registered Representative of Ceros Financial Services (CFS), a FINRA member broker-dealer.

Ted H. Ong

Additional information about Ted H. Ong is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name: Ted H. Ong

Born: 1952

Education:

B.A., Anthropology; Stanford University

M.B.A., International Marketing; Brigham Young University

Employment History for Preceding Five Years:

President and Marketing Director, Prudent Investors Network, Inc.
Registered Representative, Ceros Financial Services
Registered Representative, Rydex Financial Services

04/2003 to present
08/2009 to present
04/2003 to 7/2009

Other:

Securities Examinations: 7, 24, 31, 63, 65

CA Insurance No: 0782651

Item 3: DISCIPLINARY INFORMATION – none

Item 4: OTHER BUSINESS ACTIVITIES

- 1) California State University at Fullerton Fiduciary program; Board member and instructor of “Management of the Investment Portfolio” class since 2003
- 2) Professional Fiduciary Association of California;
- 3) National Guardianship Association;
- 4) Fiduciary Abuse Specialist Team; Consultant

Ted Ong is dually registered—both as a Registered Investment Advisor (advisory business) and as a Registered Representative of Ceros Financial Services (broker-dealer business). He may (though rarely does) direct securities brokerage transactions for clients on a fully disclosed commission basis. The securities commission business is separate from PIN’s fee-only investment management services. He may receive “trail” (or “12(b)(1)”) fees from the sale of mutual funds. Clients should be aware that the receipt of additional compensation creates a potential conflict of interest and may affect the judgment of individuals when making recommendations. Ted is insurance licensed and may receive commissions for insurance and annuity transactions.

Ceros Financial Services (CFS) supervises the dually registered representatives to the extent required under FINRA Rules (and Interpretations), which includes all securities trading activities. CFS reviews the following for compliance with FINRA Rules:

- checks received
- e-mails and letters sent and received
- advertisements
- presentations
- newsletters
- marketing brochures
- trade show booth displays

CFS does not supervise advisor-related activities.

Contact information for broker-dealer business:
Michael Fox and Angela Holland, CFS Supervision
Ceros Financial Services
1445 Research Blvd., Suite 530
Rockville, MD 20850
866-842-3356

Item 5: ADDITIONAL COMPENSATION – none

Item 6: SUPERVISION OF ADVISORY ACTIVITIES

Contact information:
Lee Anke, CEO
Prudent Investors Network
2598 Fortune Way, Suite G
Vista, CA 92081
760-597-9255



Lee H. Anke

Additional information about Lee H. Anke is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name: Lee H. Anke

Born: 1944

Education:

B.S., Physics; Pomona College

M.A. Physics; University of California, Riverside

M.B.A., Finance; University of Utah

Employment History for Preceding Five Years:

CEO and Director, Prudent Investors Network, Inc.

04/2003 to present

Registered Representative, Ceros Financial Services (CFS)

8/2009 to present

Registered Representative, Rydex Financial Services (CFS' predecessor)

04/2003 to 7/2009

Other:

Securities Examinations: 7, 24, 63, 65

Item 3: DISCIPLINARY INFORMATION – none

Item 4: OTHER BUSINESS ACTIVITIES –

- 1) California State University at Fullerton Fiduciary program; Board member and instructor of "Management of the Investment Portfolio" class since 2003
- 2) Professional Fiduciary Association of California;
- 3) National Guardianship Association;
- 4) Fiduciary Abuse Specialist Team; Consultant

Item 5: ADDITIONAL COMPENSATION – none

Item 6: SUPERVISION OF ADVISORY ACTIVITIES

Contact information:

Ted H. Ong, President

Prudent Investors Network

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Vista, CA 92081

760-597-9255



Jared Ong

Additional information about Jared Ong is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name: Jared Ong

Born: 1978

Education:

B.M., Music; Brigham Young University

Employment History for Preceding Five Years:

Portfolio Analyst, Prudent Investors Network	09/2010 to Present
Business Systems Analyst, Capital Group Companies	08/2005 to 08/2010

Other:

Securities Examination: 65

Item 3: DISCIPLINARY INFORMATION – none

Item 4: OTHER BUSINESS ACTIVITIES - none

Item 5: ADDITIONAL COMPENSATION – none

Item 6: SUPERVISION

Contact information:

Lee Anke, CEO

Prudent Investors Network

2598 Fortune Way, Suite G

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760-597-9255