



Prudent Investors Network, Inc.
Form ADV Part 2A: Firm Brochure

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This brochure provides information about the qualifications and business practices of Prudent Investors Network, Inc. ("Prudent Investors"). If you have any questions about the contents of this brochure, please contact us at (760) 597-9255 or info@PrudentInvestors.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. Prudent Investors is a Registered Investment Adviser. Registration as an Investment Adviser with the United States Securities and Exchange Commission or any state securities authority does not imply a certain level of skill or training.

Additional information about Prudent Investors is available on the SEC's website at www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as an IARD number. The IARD number for Prudent Investors is 127284.

ITEM 2 – MATERIAL CHANGES

This section of the Brochure will address only those “material changes” that have been incorporated since our last delivery or posting of this document on the SEC’s public disclosure website (IAPD) www.adviserinfo.sec.gov. There have been no material changes since our last amendment on February 20, 2023.

If you would like another copy of this Brochure, please download it from the SEC Website as indicated above or you may contact us at info@PrudentInvestors.com. We encourage you to read this document in its entirety.

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ITEM 4 – ADVISORY BUSINESS

This Disclosure document is being offered to you by Prudent Investors Network, Inc. (“Prudent Investors”) about the investment advisory services we provide. It discloses information about our services and the way those services are made available to you, the client.

We are an investment management firm located in Lake Forest, California. We specialize in investment advisory services for fiduciaries, individuals, high net worth individuals, trusts, estates and other institutions. Prudent Investors became a registered investment adviser in April 2014. Jeremy Lau is the sole owner.

We are committed to helping clients build, manage, and preserve their wealth, and to provide assistance that helps clients to achieve their stated financial goals. We will offer an initial complimentary meeting upon our discretion; however, investment advisory services are initiated only after you and Prudent Investors execute an Investment Management Agreement.

Investment Management Services

We manage advisory accounts on a discretionary basis. Once we have determined a profile and investment plan with a client, we will execute the day-to-day transactions without seeking prior client consent. Account supervision is guided by the written profile and investment plan of the client. We may accept accounts with certain restrictions if circumstances warrant. We primarily allocate client assets among various exchange-traded funds (“ETFs”), mutual funds, no-load, load-waived, or individual stocks, bonds, cash, managed futures, hedging strategies, and other investments suitable for diversification and management of risk in securities accounts in accordance with their stated investment objectives. We may also use CDs, T-Bills, Treasury Notes, Treasuries and/or structured notes.

During personal discussions with clients, we determine the client’s objectives, time horizons, risk tolerance and liquidity needs. As appropriate, we also review a client’s prior investment history, as well as family composition and background. Based on client needs, we develop a client’s personal profile and investment plan. We then create and manage the client’s investments based on that policy and plan. It is the client’s obligation to notify us immediately if circumstances have changed with respect to their goals.

Once we have determined the appropriate strategy for you, your family, or your client and executed the strategy, we will provide ongoing investment review and management services. This approach requires us to periodically review your portfolio.

With our discretionary relationship, we will make changes to the portfolio, as we deem appropriate, to meet your financial objectives. We trade these portfolios based on the combination of our market views and your objectives, using our investment process. We tailor our advisory services to meet the needs of our clients and seek to ensure that your portfolio is managed in a manner consistent with those needs and objectives.

Where appropriate, we provide advice about concentrated stock positions held in client portfolios. Clients will engage us to advise on certain investment products that are not maintained at their primary custodian, such as annuity contracts and assets held in employer sponsored retirement plans and qualified tuition plans (i.e., 529 plans).

You are advised and are expected to understand that our past performance is not a guarantee of future results. Certain market and economic risks exist that adversely affect an account's performance. This could result in capital losses in your account.

Consulting Services

We also provide clients investment advice on a more limited basis on one or more isolated areas of concern such as fiduciary investing, compliance with probate codes including the Uniform Prudent Investor Act, tax loss harvesting, structured settlements, or any other specific topic. Additionally, we provide advice on non-securities matters about the rendering of estate planning, insurance, real estate, and/or annuity advice.

Wrap Fee Program

We do not offer a Wrap Fee Program.

Disclosure Regarding Retirement Plan Rollover Recommendations

We are fiduciaries under the Investment Advisers Act of 1940 and when we provide investment advice to you regarding your retirement plan account or individual retirement account, we are also fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. We have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests.

A client or prospect leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) rollover to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). Prudent Investors may recommend an investor roll over plan assets to an IRA for which we would provide investment advisory services. As a result, Prudent Investors may earn an asset-based fee. In contrast, a recommendation that a client or prospective client leave their plan assets with their previous employer or roll over the assets to a plan sponsored by a new employer will generally result in no compensation to us. Prudent Investors therefore has an economic incentive to encourage a client to roll plan assets into an IRA that we will manage, which presents a conflict of interest. To mitigate the conflict of interest, there are various factors that Prudent Investors will consider before recommending a rollover, including but not limited to: (i) the investment options available in the plan versus the investment options available in an IRA, (ii) fees and expenses in the plan versus the fees and

expenses in an IRA, (iii) the services and responsiveness of the plan's investment professionals versus those of Prudent Investors, (iv) protection of assets from creditors and legal judgments, (v) required minimum distributions and age considerations, and (vi) employer stock tax consequences, if any. Prudent Investors' Chief Compliance Officer remains available to address any questions that a client or prospective client has regarding the oversight.

Assets

As of December 31, 2023, Prudent Investors managed \$295,437,651 in client assets on a discretionary basis, and no non-discretionary assets.

ITEM 5 - FEES AND COMPENSATION

Investment Management Fees and Compensation

Prudent Investors charges a fee as compensation for providing investment management services on your account. These services include advisory and consulting services, trade entry, investment supervision, and other account maintenance activities. Our recommended custodian may charge custodial fees, transaction fees, redemption fees, retirement plan and administrative fees or commissions. See ***Additional Fees and Expenses*** below for additional details.

The fees for portfolio management are based on an annual percentage of assets under management and are applied to the account asset value on a pro-rata basis and billed monthly in advance. The initial fee will be on the market value the date the account was funded, prorated for the number of days in the month that your account is under management. Thereafter, the monthly fee will be calculated on the close of the last business day of the prior calendar month. The market value will be determined as reported by the Custodian. Unless otherwise agreed upon and stated in the Management Agreement, fees are assessed on all assets under management, including securities, cash and cash equivalents, any margin debt balances, and money market balances. When applicable and noted in the Management Agreement, legacy positions may be excluded from the fee calculation. Our maximum annual fee for managed account is 1.4% and the specific advisory fees are set forth in your management agreement.

The independent qualified custodian holding your funds and securities will debit your account directly for the advisory fee and pay that fee to us. You will provide written authorization permitting the fees to be paid directly from your account held by the qualified custodian. Further, the qualified custodian agrees to deliver an account statement at least quarterly directly to you indicating all the amounts deducted from the account including our advisory fees. If there is activity in a month, a monthly statement will be sent. At our discretion Prudent Investors will allow advisory fees to be paid by check as indicated in the Management Agreement. You are encouraged to review your account statements for accuracy.

Either Prudent Investors or you may terminate the management agreement immediately upon written notice to the other party. The management fee will be pro-rated to the date of termination, for the month in which the cancellation notice was given and the unearned fee refunded to you upon request. Upon termination, you are responsible for monitoring the securities in your account, and we will have no further obligation to act or advise with respect to those assets. In the event of client's death or disability, Prudent Investors will continue management of the account until we are notified of client's death or disability and given alternative instructions by an authorized party.

Consulting Fees

We provide expert witness and consulting services for clients who need advice on a limited scope of work. We will negotiate consulting fees with you. Fees are billed at \$750 an hour or a fixed negotiated fee for Consulting Services. An estimate for total hours will be determined before the work begins and the estimated fee may be due upon signing the advisory agreement. If the work expands beyond what was initially anticipated, Prudent Investors 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, certain research services may be provided at a charge of \$250 per hour. These fees may be negotiable.

Additional Fees and Expenses:

In addition to the advisory fees paid to Prudent Investors clients also incur certain charges imposed by other third parties, such as broker-dealers, custodians, trust companies, banks and other financial institutions (collectively "Financial Institutions"). These additional charges include securities, transaction fees, custodial fees, fees charged by the Independent Managers, charges imposed directly by a mutual fund or ETF in a client's account, as disclosed in the fund's prospectus (e.g., fund management fees and other fund expenses), deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Our brokerage practices are described at length in Item 12, below. Neither Prudent Investors nor its supervised persons accept compensation for the sale of securities or other investment products in managed accounts. Further, Prudent Investors does not share in any of these additional fees and expenses outlined above.

ITEM 6 - PERFORMANCE BASED FEES AND SIDE-BY-SIDE MANAGEMENT

We do not charge advisory fees on a share of the capital appreciation of the funds or securities in a client account (so-called performance-based fees) nor engage side by side management.

ITEM 7 - TYPES OF CLIENTS

We provide investment advice to public guardians, public and private professional fiduciaries, family fiduciaries, conservators, individuals, trustees of family trusts and retirement plans, pooled investors and businesses. Our minimum initial account value is \$250,000; however, we may accept accounts for less than the minimum at our sole discretion.

ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

Through completion of a questionnaire by the client (and possible follow up questions from Prudent Investors) in which goals and objectives based on a client's particular circumstances are established, Prudent Investors 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. The questionnaire includes information related to annual income and expenses, life expectancy, and tax status.

Prudent Investors will create a portfolio including (but not necessarily limited to) ETFs. ETFs will be selected on the basis of any or all of the following criteria: economic outlook; effectiveness in diversifying the overall portfolio (non-correlation with other assets in the portfolio); the industry sector in which the position invests; the position's investment objectives; and the fee structure. Prudent Investors will allocate the client's assets among various investments taking into consideration the overall management style recommended to the client. Other types of investments may include mutual funds, individual stocks, bonds, managed futures, hedging strategies, and other investments suitable for diversification and management of risk in securities accounts. If mutual funds are used, they are acquired at Net Asset Value (meaning without the front load) in fee-based, managed accounts. 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.

Prudent Investors primarily uses ETFs. In instances when Prudent Investors uses mutual funds in our investment strategies, it is Prudent Investors' policy to purchase institutional share classes of those mutual funds, which generally offer lower expense ratios. The expense ratio is the annual fee that all mutual funds or ETFs charge their shareholders. It expresses the percentage of assets deducted each fiscal year for funds expenses, including 12b-1 fees, management fees, administrative fees, operating costs, and all other asset-based costs incurred by the fund. ETF and mutual fund expense ratios are in addition to our fee and we do not receive any portion of these charges. If an institutional share class is not available for the mutual fund selected, we will purchase the least expensive share class available for the mutual fund. If clients transfer mutual funds into their accounts with Prudent Investors, the clients would bear the expense of any contingent or deferred sales loads incurred upon selling the product. ETF and mutual fund expenses and fees are disclosed in the respective prospectus.

To protect portfolios in the face of changing markets, Prudent Investors may participate in options, short-term trading (selling securities within 30 days of purchase), inverse funds and short sales.

A majority of Prudent Investors' managed accounts are designed to optimize the inflation-adjusted "total return" of the portfolio at appropriate levels of investment risk. "Total return" includes both capital appreciation and dividend income. The Uniform Prudent Investor Act (UPIA) emphasizes total return over the traditional pursuit of maximum "income." Prudent Investors 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, Prudent Investors' portfolios are carefully diversified to optimize total return while monitoring and managing portfolio-level risk at Prudent Investors levels. This enables Prudent Investors to avoid over emphasis on current income.

Prudent Investors' investment management discipline is based in Modern Portfolio Theory, a theory of investing that has won Nobel Prizes for three individuals. Its most basic principle is that diversification reduces the riskiness of a portfolio. It has shown that by incorporating non-correlating assets into a portfolio, total returns may be maintained while reducing the portfolio's overall level of risk. Effective diversification can reduce the risk of a portfolio even if the underlying assets may be quite volatile.

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

Shorter Term Cash Management: Uses laddered CDs, T-Bill, Treasury Notes, and/or Treasuries in making cash productive and earning interest.

Income: Takes a very defensive risk profile with a large exposure in fixed income producing assets. The benchmark for this portfolio is the iShares Core Conservative ETF, which typically has a 20% equity/80% fixed income split.

Conservative: Takes a defensive balanced approach, combining modest investment in equity securities with more exposure in fixed income producing assets. The benchmark for this portfolio is the iShares Core Moderate Allocation ETF, which typically has a 40% equity/60% fixed income split.

Moderate: Takes a balanced investment approach, combining modest investment in fixed income securities with more exposure in equity assets. The benchmark for this portfolio is the iShares Core Growth Allocation ETF, which typically has a 60% equity/40% fixed income split.

Growth: Seeks to provide equity-like returns for investors with longer-term time horizons and higher risk tolerance. The benchmark for this portfolio is the iShares Core Aggressive Allocation ETF which has an equity/fixed income split of 80%/20%.

Risk of Loss

Clients must understand that past performance is not indicative of future results. Therefore, current and prospective clients should never assume that future performance of any specific investment or investment strategy will be profitable. Investing in securities involves risk of loss. Further, depending on the different types of investments there will be varying degrees of risk. Clients and prospective clients should be prepared to bear investment loss including loss of original principal.

Because of the inherent risk of loss associated with investing, Prudent Investors is unable to represent, guarantee, or even imply that our services and methods of analysis can or will predict future results, successfully identify market tops or bottoms, or insulate you from losses due to market corrections or declines.

Investors should be aware that accounts are subject to the following risks:

Market Risk — Even a long-term investment approach cannot guarantee a profit. Economic, political and issuer-specific events will cause the value of securities to rise or fall. Because the value of investment portfolios will fluctuate, there is the risk that you will lose money and your investment may be worth more or less upon liquidation.

Foreign Securities and Currency Risk — Investments in international and emerging-market securities include exposure to risks such as currency fluctuations, foreign taxes and regulations, and the potential for illiquid markets and political instability.

Capitalization Risk — Small-cap and mid-cap companies may be hindered as a result of limited resources or less diverse products or services, and their stocks have historically been more volatile than the stocks of larger, more established companies.

Interest Rate Risk — In a rising rate environment, the value of fixed-income securities generally declines and the value of equity securities may be adversely affected.

Credit Risk — Credit risk is the risk that the issuer of a security may be unable to make interest payments and/or repay principal when due. A downgrade to an issuer's credit rating or a perceived change in an issuer's financial strength may affect a security's value and, thus, impact the fund's performance.

Securities Lending Risk — Securities lending involves the risk that the fund loses money because the borrower fails to return the securities in a timely manner or at all. The fund could also lose money if the value of the collateral provided for loaned securities, or the value of the investments made with the cash collateral, falls. These events could also trigger adverse tax consequences for the fund.

Exchange-Traded Funds — ETFs face market-trading risks, including the potential lack of an active market for shares, losses from trading in the secondary markets and disruption in the

creation/redemption process of the ETF. Any of these factors may lead to the fund's shares trading at either a premium or a discount to its "net asset value."

Performance of Underlying Managers — We select the mutual funds and ETFs in our portfolios. However, we depend on the manager of such funds to select individual investments in accordance with their stated investment strategy.

Liquidity Risk - Liquidity risk exists when particular investments would be difficult to purchase or sell, possibly preventing clients from selling such securities at an advantageous time or price.

Cybersecurity Risk - In addition to the material risks listed above, investing involves various operational and "cybersecurity" risks. These risks include both intentional and unintentional events at Prudent Investors or one of our third-party counterparties or service providers, that may result in a loss or corruption of data, result in the unauthorized release or other misuse of confidential information, and generally compromise Prudent Investors' ability to conduct business. A cybersecurity breach may also result in a third-party obtaining unauthorized access to our clients' information, including social security numbers, home addresses, account numbers, account balances, and account holdings. Prudent Investors has established business continuity plans and risk management systems designed to reduce the risks associated with cybersecurity breaches. However, there are inherent limitations in these plans and systems, including that certain risks may not have been identified, in large part because different or unknown threats may emerge in the future. As such, there is no guarantee that such efforts will succeed, especially because Prudent Investors does not directly control the cybersecurity systems of our third-party service providers. There is also a risk that cybersecurity breaches may not be detected.

ITEM 9 - DISCIPLINARY INFORMATION

Our Firm has no legal or disciplinary events that are material to a Client or prospective clients, evaluation of our advisory business, or the integrity of our management services.

ITEM 10 - OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

Prudent Investors has no other financial industry activities or affiliations.

Insurance

None of our associated persons are licensed insurance agents. As a fee only advisory firm, Prudent Investors does not accept commissions. Should the need arise for insurance implementation, Prudent Investors will refer our clients to an insurance professional who may work on a commission basis. Prudent Investors will not share in these commissions in any way and will not receive any referral fees.

IARs of Prudent Investors do not have an application pending to register as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

ITEM 11 - CODE OF ETHICS

We have developed and implemented a Code of Ethics that sets forth standards of conduct expected of our advisory personnel to mitigate this conflict of interest. The Code of Ethics addresses, among other things, personal trading, gifts, the prohibition against the use of inside information. The Code of Ethics is designed to protect our clients to detect and deter misconduct, educate personnel regarding Prudent Investors' expectations and laws governing their conduct, remind personnel that they are in a position of trust and must act with complete propriety at all times, protect the reputation of Prudent Investors, guard against violation of the securities laws, and establish procedures for personnel to follow so that we may determine whether their personnel are complying with Prudent Investors' ethical principles.

Prudent Investors and persons associated with us are allowed to invest for their own accounts or to have a financial investment in the same securities or other investments that we recommend or acquire for your account and may engage in transactions that are the same as or different than transactions recommended to or made for your account. This creates a conflict of interest. We recognize the fiduciary responsibility to act in your best interest and have established policies to mitigate conflicts of interest.

We have established the following restrictions in order to ensure Prudent Investors' fiduciary responsibilities:

1. A director, officer or employee of Prudent Investors shall not buy or sell any 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 investing public on reasonable inquiry. No supervised employee of Prudent Investors shall prefer his or her own interest to that of the advisory client. Trades for supervised employees are traded alongside client accounts.
2. We maintain a list of all securities holdings of anyone associated with this advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer/individual of Prudent Investors.
3. We emphasize the unrestricted right of the client to decline to implement any advice rendered, except in situations where we are granted discretionary authority of the client's account.
4. We require that all supervised employees must act in accordance with all applicable Federal and State regulations governing registered investment advisory practices.
5. Any supervised employee not in observance of the above may be subject to termination.

You may request a complete copy of our Code of Ethics by contacting us at the telephone number on the cover page of this Part 2; Attn: Chief Compliance Officer.

ITEM 12 - BROKERAGE PRACTICES

Prudent Investors participates in the Charles Schwab & Co., Inc. (Schwab) Institutional program and with National Financial Services through a relationship with Ceros Financial Services (“custodians”). Schwab, National Financial Services and Ceros Financial Services are members FINRA/SIPC. All custodians are independent and unaffiliated SEC-registered broker-dealers. The custodians offer services to independent investment advisors that include custody of securities, trade execution, clearance and settlement of transactions.

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 any other independent investment advisors participating in the program. 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; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors. Our custodians also have paid for business consulting and professional services received by some of our related persons. Some of the products and services made available by our custodians through the program may benefit us but may not benefit your account. These products or services may assist us in managing and administering your account, including accounts not maintained at our custodians. Other services made available by our custodians are intended to help us manage and further develop our business enterprise. The benefits received by Prudent Investors or our personnel through participation in the program do not depend on the amount of brokerage transactions directed to our custodians. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of economic benefits by Prudent Investors or our related persons in and of itself creates a conflict of interest and may indirectly influence our choice of these custodians for custody and brokerage services.

In the event you request us to recommend a broker/dealer custodian for execution and/or custodial services, we generally recommend your account to be maintained at one of our custodians. We may recommend that you establish accounts with one of our custodians to maintain custody of your assets and to effect trades for your accounts. You are under no obligation to act upon any recommendations, and if you elect to act upon any recommendations, you are under no obligation to place the transactions through any broker/dealer we recommend. Our recommendation is generally based on the broker’s cost and fees, skills, reputation, dependability and compatibility with the client. You may be able to obtain lower commissions and fees from other brokers and the value of products, research and services

given to us is not a factor in determining the selection of broker/dealer or the reasonableness of their commissions.

Aggregation and Allocation of Transactions

We may aggregate transactions if we believe that aggregation is consistent with the duty to seek best execution for our clients and is consistent with the disclosures made to clients and terms defined in the client Investment Advisory Agreement. We may make trades in individual accounts (that are not aggregated with others) so that we may address that client's unique circumstances. No advisory client will be favored over any other client, and each account that participates in an aggregated order will participate at the average share price (per custodian) for all transactions in that security on a given business day.

We will aggregate trades for ourselves or our associated persons with your trades, providing that the following conditions are met:

1. Our policy for the aggregation of transactions shall be fully disclosed separately to our existing clients (if any) and the broker/dealer(s) through which such transactions will be placed;
2. We will not aggregate transactions unless we believe that aggregation is consistent with our duty to seek the best execution (which includes the duty to seek best price) for you and is consistent with the terms of our Investment Advisory Agreement with you for which trades are being aggregated.
3. No advisory client will be favored over any other client; each client that participates in an aggregated order will participate at the average share price for all our transactions in a given security on a given business day, with transaction costs based on each client's participation in the transaction;
4. We will prepare a written statement ("Allocation Statement") specifying the participating client accounts and how to allocate the order among those clients;
5. If the aggregated order is filled in its entirety, it will be allocated among clients in accordance with the allocation statement; if the order is partially filled, the accounts that did not receive the previous trade's positions should be "first in line" to receive the next allocation.
6. Notwithstanding the foregoing, the order may be allocated on a basis different from that specified in the Allocation Statement if all client accounts receive fair and equitable treatment and the reason for difference of allocation is explained in writing and is reviewed by our compliance officer. Our books and records will separately reflect, for each client account, the orders of which aggregated, the securities held by, and bought for that account.

7. We will receive no additional compensation or remuneration of any kind as a result of the proposed aggregation; and
8. Individual advice and treatment will be accorded to each advisory client.

Trade Errors

We have implemented procedures designed to prevent trade errors; however, trade errors in client accounts cannot always be avoided. Consistent with our fiduciary duty, it is our policy to correct trade errors in a manner that is in the best interest of the client. In cases where the client causes the trade error, the client will be responsible for any loss resulting from the correction. Depending on the specific circumstances of the trade error, the client may not be able to receive any gains generated as a result of the error correction. In all situations where the client does not cause the trade error, the client will be made whole and we will absorb any loss resulting from the trade error if the error was caused by Prudent Investors. If the error is caused by the Custodian, the Custodian will be responsible for covering all trade error costs. If an investment gain results from the correcting trade, the gain will be donated to charity. We will never benefit or profit from trade errors.

Directed Brokerage

We do not routinely recommend, request or require that you direct us to execute transaction through a specified broker dealer. Additionally, we typically do not permit you to direct brokerage. We place trades for your account subject to our duty to seek best execution and other fiduciary duties.

ITEM 13 - REVIEW OF ACCOUNTS

Account Reviews and Reviewers – Investment Supervisory Services

Our Investment Adviser Representatives will monitor client accounts on a regular basis and perform annual reviews with each client. All accounts are reviewed for consistency with client investment strategy, asset allocation, risk tolerance and performance relative to the appropriate benchmark. More frequent reviews may be triggered by changes in an account holder's personal, tax or financial status. Geopolitical and macroeconomic specific events may also trigger reviews.

Statements and Reports

The custodian for the individual client's account will provide clients with an account statement at least quarterly. Reports may also be provided at every client meeting. Communication to clients will be done on an as needed basis with a minimum of 1 contact per calendar year. You are urged to compare the reports provided by Prudent Investors against the account statements you receive directly from your account custodian.

Those clients who are exclusively Consulting clients (i.e. those who have no assets under management with us in our advisory program) will receive no regular reports from Prudent Investors.

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION

We do not pay referral fees or receive compensation for referrals.

As disclosed under Brokerage Practices, we participate in Schwab’s Institutional and National Financial Services through a relationship with Ceros Financial Services (“custodians”) customer programs and we may recommend these custodians to you 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 any other independent Investment Advisors participating in the program. 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 us by third party vendors. Our custodians may also have paid for business consulting and professional services received by some of our related persons. Some of the products and services made available by our custodians through the program may benefit us but may not benefit your account. These products or services may assist us in managing and administering your account, including accounts not maintained at one of our custodians. Other services made available by these custodians are intended to help us manage and further develop our business enterprise. The benefits received by Prudent Investors or our personnel through participation in the programs do not depend on the amount of brokerage transactions directed to the custodian. As part of our fiduciary duties to clients, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of economic benefits by Prudent Investors or our related persons in and of itself creates a conflict of interest and may indirectly influence our choice of one of these custodians for custody and brokerage services.

ITEM 15 – CUSTODY

Custody has been defined by regulators as having access or control over client funds and/or securities. Prudent Investors does not have *physical custody*, as it applies to investment advisors.

Deduction of Advisory Fees

For all accounts, Prudent Investors has the authority to have fees deducted directly from client accounts. Prudent Investors has established procedures to ensure all client funds and securities are held at a qualified custodian in a separate account for each client under that client's name. Clients or an independent representative of the client will direct, in writing, the establishment of all accounts and therefore are aware of the qualified custodian's name, address and the manner in which the funds or securities are maintained. Finally, account statements are delivered directly from the qualified custodian to each client, or the client's independent representative, at least quarterly. You should carefully review those statements and are urged to compare the statements against reports received from Prudent Investors. When you have questions about your account statements, you should contact Prudent Investors or the qualified custodian preparing the statement. Please refer to Item 5 for more information about the deduction of adviser fees.

ITEM 16 – INVESTMENT DISCRETION

For discretionary accounts, prior to engaging Prudent Investors to provide investment advisory services, you will enter a written Agreement with us granting Prudent Investors the authority to supervise and direct, on an on-going basis, investments in accordance with the client's investment objective and guidelines. In addition, you will need to execute additional documents required by the Custodian to authorize and enable Prudent Investors, in its sole discretion, without prior consultation with or ratification by you, to purchase, sell or exchange securities in and for your accounts. We are authorized, in our discretion and without prior consultation with you to: (1) buy, sell, exchange and trade any stocks, bonds or other securities or assets and (2) determine the amount of securities to be bought or sold and (3) place orders with the custodian. Any limitations to such discretionary authority will be communicated to Prudent Investors in writing by you, the client.

The limitations on investment and brokerage discretion held by Prudent Investors for you are:

1. For discretionary accounts, we require that we be provided with authority to determine which securities and the amounts of securities to be bought or sold.
2. Any limitations on this discretionary authority shall in writing as indicated on the Investment Advisory Agreement. You may change/amend these limitations as required.

ITEM 17 – VOTING CLIENT SECURITIES

Proxies:

We will **not** vote proxies on your behalf. You are welcome to vote proxies or designate an independent third-party at your own discretion. You designate proxy voting authority in the custodial account documents. You must ensure that proxy materials are sent directly to you or your assigned third party. We do not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies. Clients can contact our office with questions about a particular solicitation by phone at (760) 597-9255.

Class Action Suits:

A class action is a procedural device used in litigation to determine the rights of and remedies, if any, for large numbers of people whose cases involve common questions of law and/or fact. Class action suits frequently arise against companies that publicly issue securities, including securities recommended by investment advisors to clients. With respect to class action suits and claims, you (or your agent) will have the responsibility for class actions or bankruptcies, involving securities purchased for or held in your account. We do not provide such services and are not obligated to forward copies of class action notices we may receive to you or your agents.

ITEM 18 – FINANCIAL INFORMATION

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, we are not required to include a balance sheet for our most recent fiscal year. We have not been the subject of a bankruptcy petition at any time.



Prudent Investors Network, Inc.

Form ADV Part 2B Brochure

JEREMY LAU, CFA®, CFP®
CRD# 6812603

TED H. ONG
CRD# 1185460

JARED ONG, CFP®
CRD# 5022033

February 12, 2024

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The following "Part 2B – Brochure Supplement" provides information about **Jeremy Lau, Ted H. Ong, and Jared Ong** that supplements the Prudent Investors Network, Inc. ("Prudent Investors") Firm Brochure. You should have received a copy of the Firm Brochure. Please contact Elisa Williamson at (760) 597-9255 if you did not receive Prudent Investors' Firm Brochure or if you have any questions about the contents of this supplement.

Prudent Investors is an SEC-registered investment advisor. Additional information about Jeremy Lau, Ted H. Ong and Jared Ong is available on the SEC's website at www.adviserinfo.sec.gov

Jeremy Lau

ITEM 2: EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Name: Jeremy Lau

Born: 1981

Education:

B.S., Accounting (with Honors), Brigham Young University

Employment History for Preceding Five Years:

CEO – Prudent Investors	01/2023 to Present
President – Prudent Investors	01/2018 to 12/2022
Chief Investment Officer – Prudent Investors	05/2017 to 01/2018
Director, Deutsche Bank AG - Convertible Bond Sales - Hong Kong	2011 to 2017
Associate Director, UBS AG - Equity-linked Sales - Hong Kong	2009 to 2011
Analyst, Deutsche Securities Inc - Credit / CB Sales - Tokyo	2006 to 2009

Other:

Securities Examination Passed: 65

SFC Paper 1

JSDA L1/L2

Chartered Financial Analyst (CFA®) ¹

Certified Financial Planner™ (CFP®) ²

¹ Chartered Financial Analyst (CFA®) Designation Minimum Qualifications

The Chartered Financial Analyst is a globally respected, graduate-level investment credential established in 1962 and awarded by the CFA® Institute — the largest global association of investment professionals.

There are currently more than 138,000 CFA® charter holders working in 134 countries. To earn the CFA charter, candidates must: 1) pass three sequential, six-hour examinations; 2) have at least four years of qualified professional investment experience; 3) join CFA® Institute as members; and 4) commit to abide by and annually reaffirm, their adherence to the CFA® Institute Code of Ethics and Standards of Professional Conduct.

High Ethical Standards

The CFA Institute Code of Ethics and Standards of Professional Conduct, enforced through an active professional conduct program, require CFA charter-holders to:

- Place their clients' interests ahead of their own;
- Maintain independence and objectivity;
- Act with integrity;
- Maintain and improve their professional competence;
- Disclose conflicts of interest and legal matters.

Global Recognition

Passing the three CFA exams is a difficult feat that requires extensive study (successful candidates report spending an average of 300 hours of study per level). Earning the CFA charter demonstrates mastery of the advanced skills needed for investment analysis and decision-making in today's quickly evolving global financial industry. As a result, employers and clients increasingly seek CFA charter holders—often making the charter a prerequisite for employment.

Additionally, regulatory bodies in over 30 countries and territories recognize the CFA charter as a proxy for meeting specific licensing requirements, and more than 125 colleges and universities around the world have incorporated most of the CFA® Program curriculum into their finance courses.

Comprehensive and Current Knowledge

The CFA® Program curriculum provides a comprehensive framework of knowledge for investment decision-making and is firmly grounded in the knowledge and skills used daily in the investment profession. The three levels of the CFA® Program test proficiency with a wide range of fundamental and advanced investment topics, including ethical and professional standards, fixed income and equity analysis, alternative and derivative investments, economics, financial reporting standards, portfolio management, and wealth planning.

The CFA® Program curriculum is updated annually by experts worldwide to ensure that candidates learn the most relevant and practical new tools, ideas, and investment and wealth management skills to reflect the dynamic and complex nature of the profession.

To learn more about the CFA® charter, visit www.cfainstitute.org.

² Certified Financial Planner (“CFP®”) Designation Minimum Qualifications

I am certified for financial planning services in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and the CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.CFP.net.

CFP® professionals have met the CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas the CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials. CFP Board implemented the bachelor’s degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor’s or higher degree or completed a financial planning development capstone course.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with the CFP Board’s Code and Standards. This includes a commitment to the CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional’s services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.

- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3: DISCIPLINARY INFORMATION

Registered investment advisers must disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Jeremy Lau has no history of any legal or disciplinary events deemed material to a client's considerations of Jeremy Lau to act as their investment adviser representative.

ITEM 4: OTHER BUSINESS ACTIVITIES

California State University at Fullerton Fiduciary Certification program; instructor of the "Management of the Investment Portfolio" class. It is anticipated that a small portion, less than (10%) of his time, will be spent with this activity and does not create a conflict of interest between the firm and its clients.

ITEM 5: ADDITIONAL COMPENSATION

Jeremy Lau does not receive any economic benefit outside of the salaries and bonuses described in Item 4 of this brochure.

ITEM 6: SUPERVISION OF ADVISORY ACTIVITIES

Jeremy Lau is supervised through a compliance program designed to prevent and detect violations of the federal and state securities laws. Chief Compliance Officer Elisa Williamson, who is responsible for administering the policies and procedures, reviews those policies and procedures annually for their adequacy and the effectiveness of their implementation. Elisa Williamson may be reached at (760) 597-9255.

Ted H. Ong

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:

Principal, Prudent Investors

1/2020 to Present

CEO, Prudent Investors

01/2018 to 12/2020

President and Marketing Director, Prudent Investors

04/2003 to 12/2018

Other:

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

Series 7, 24, 31, 63 are currently inactive

ITEM 3: DISCIPLINARY INFORMATION

Registered investment advisers must disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Ted Ong has no history of any legal or disciplinary events deemed material to a client's considerations of Ted Ong to act as their investment adviser representative.

ITEM 4: OTHER BUSINESS ACTIVITIES

California State University at Fullerton Fiduciary Certification program; instructor of the "Management of the Investment Portfolio" class since 2006. It is anticipated that a small portion, less than (10%) of his time, will be spent with this activity and does not create a conflict of interest between the firm and its clients.

ITEM 5: ADDITIONAL COMPENSATION

Ted Ong does not receive any economic benefit outside of the salaries and bonuses described in Item 4 of this brochure.

ITEM 6: SUPERVISION OF ADVISORY ACTIVITIES

Ted Ong is supervised through a compliance program designed to prevent and detect violations of the federal and state securities laws. Chief Compliance Officer Elisa Williamson, who is responsible for administering the policies and procedures, reviews those policies and procedures annually for their adequacy and the effectiveness of their implementation. Elisa Williamson may be reached at (760) 597-9255.

Jared Ong

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:

Principal, Prudent Investors	1/2023 to Present
Portfolio Analyst, Prudent Investors	09/2010 to 12/2022
Business Systems Analyst, Capital Group Companies	08/2005 to 08/2010

Other:

Securities Examination Passed: 65
Certified Financial Planner™ (CFP®) ¹

¹ Certified Financial Planner (“CFP®”) Designation Minimum Qualifications

I am certified for financial planning services in the United States by the Certified Financial Planner Board of Standards, Inc. (“CFP Board”). Therefore, I may refer to myself as a CERTIFIED FINANCIAL PLANNER™ professional or a CFP® professional, and I may use these and the CFP Board’s other certification marks (the “CFP Board Certification Marks”). The CFP® certification is voluntary. No federal or state law or regulation requires financial planners to hold the CFP® certification. You may find more information about the CFP® certification at www.CFP.net.

CFP® professionals have met the CFP Board’s high standards for education, examination, experience, and ethics. To become a CFP® professional, an individual must fulfill the following requirements:

- Education – Earn a bachelor’s degree or higher from an accredited college or university and complete CFP Board-approved coursework at a college or university through a CFP Board Registered Program. The coursework covers the financial planning subject areas the CFP Board has determined are necessary for the competent and professional delivery of financial planning services, as well as a comprehensive financial plan development capstone course. A candidate may satisfy some of the coursework requirements through other qualifying credentials. CFP Board implemented the bachelor’s degree or higher requirement in 2007 and the financial planning development capstone course requirement in March 2012. Therefore, a CFP® professional who first became certified before those dates may not have earned a bachelor’s or higher degree or completed a financial planning development capstone course.
- Examination – Pass the comprehensive CFP® Certification Examination. The examination is designed to assess an individual’s ability to integrate and apply a broad base of financial planning knowledge in the context of real-life financial planning situations.
- Experience – Complete 6,000 hours of professional experience related to the personal financial planning process or 4,000 hours of apprenticeship experience that meets additional requirements.
- Ethics – Satisfy the Fitness Standards for Candidates for CFP® Certification and Former CFP® Professionals Seeking Reinstatement and agree to be bound by CFP Board’s Code of Ethics and Standards of Conduct (“Code and Standards”), which sets forth the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements to remain certified and maintain the right to continue to use the CFP Board Certification Marks:

- Ethics – Commit to complying with the CFP Board’s Code and Standards. This includes a commitment to the CFP Board, as part of the certification, to act as a fiduciary, and therefore, act in the best interests of the client, at all times when providing financial advice and financial planning. CFP Board may sanction a CFP® professional who does not abide by this commitment, but CFP Board does not guarantee a CFP® professional's services. A client who seeks a similar commitment should obtain a written engagement that includes a fiduciary obligation to the client.
- Continuing Education – Complete 30 hours of continuing education every two years to maintain competence, demonstrate specified levels of knowledge, skills, and abilities, and keep up with developments in financial planning. Two of the hours must address the Code and Standards.

ITEM 3: DISCIPLINARY INFORMATION

Registered investment advisers must disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of each supervised person providing investment advice.

Jared Ong has no history of any legal or disciplinary events deemed material to a client’s considerations of Jared Ong to act as their investment adviser representative.

ITEM 4: OTHER BUSINESS ACTIVITIES

Jared Ong does not engage in any other investment-related businesses or occupations deemed material in your consideration of Jared Ong as your investment advisor representative.

ITEM 5: ADDITIONAL COMPENSATION

Jared Ong does not receive any economic benefit outside of the salaries and bonuses described in Item 4 of this brochure.

ITEM 6: SUPERVISION

Jared Ong is supervised through a compliance program designed to prevent and detect violations of the federal and state securities laws. Chief Compliance Officer Elisa Williamson, who is responsible for administering the policies and procedures, reviews those policies and procedures annually for their adequacy and the effectiveness of their implementation. Elisa Williamson may be reached at (760) 597-9255.