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FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

Name of Investment Adviser: Hedgeable, Inc.					
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code:	Telephone Number:
419 Lafayette St. 2nd Fl.	New York	NY	10003		800-785-7914

This part of FORM ADV gives information about the investment adviser and its business for the use of clients. The information has not been approved or verified by any government authority.

Table of Contents

(Schedule A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

FORM ADV Part II - Page 2	Applicant: Hedgeable, Inc.	SEC File Number: 801- 70204	Date: 03/08/10

1. A. Advisory Services and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- [x] (1) Provides investment supervisory services .... 100 est %
- [ ] (2) Manages investment advisory accounts not involving investment supervisory services........ %
- [ ] (3) Furnishes investment advice through consultations not included in either service described above... %
- [ ] (4) Issues periodicals about securities by subscription .... %
- [ ] (5) Issues special reports about securities not included in any service described above........ %
- [ ] (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities........ %
- [ ] (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities... %
- [ ] (8) Provides a timing service .... %
- [ ] (9) Furnishes advice about securities in any manner not described above........ %

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does applicant call any of the services it checked above financial planning or some similar term? .... Yes [ ] No [x]

C. Applicant offers investment advisory services for: (check all that apply)

- [ ] (1) A percentage of assets under management
- [ ] (2) Hourly charges
- [ ] (3) Fixed fees (not including subscription fees)
- [x] (4) Subscription fees
- [ ] (5) Commissions
- [ ] (6) Other

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee schedule, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. Types of clients - Applicant generally provides investment advice to: (check those that apply)

- [x] A. Individuals
- [ ] B. Banks or thrift institutions
- [ ] C. Investment companies
- [ ] D. Pension and profit sharing plans
- [ ] E Trusts, estates, or charitable organizations
- [ ] F. Corporations or business entities other than those listed above
- [ ] G. Other (describe on Schedule F)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1)

FORM ADV Part II - Page 3	Applicant: Hedgeable, Inc.	SEC File Number: 801-70204	Date: 03/08/10

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

A. Equity securities
- ☑ (1) exchange-listed securities
- ☐ (2) securities traded over-the-counter
- ☐ (3) Foreign issuers

☐ B. Warrants

☐ C. Corporate debt securities (other than commercial paper)

☐ D. Commercial paper

☐ E. Certificates of deposit

☐ F. Municipal securities

G. Investment company securities:
- ☐ (1) variable life insurance
- ☐ (2) variable annuities
- ☐ (3) mutual fund shares

☐ H. United States government securities

I. Options contracts on:
- ☑ (1) securities
- ☐ (2) commodities

J. Futures contracts on:
- ☐ (1) tangibles
- ☐ (2) intangibles

K. Interests in partnerships investing in:
- ☐ (1) real estate
- ☐ (2) oil and gas interests
- ☐ (3) other (explain on Schedule F)

☐ L. Other (explain on Schedule F)

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- (1) ☑ Charting
- (2) ☑ Fundamental
- (3) ☑ Technical
- (4) ☑ Cyclical
- (5) ☐ Other (explain on Schedule F)

B. The main sources of information applicant uses include: (check those that apply)

- (1) ☑ Financial newspapers and magazines
- (2) ☐ Inspections of corporate activities
- (3) ☑ Research materials prepared by others
- (4) ☐ Corporate rating services
- (5) ☐ Timing services
- (6) ☐ Annual reports, prospectuses, filings with the Securities and Exchange Commission
- (7) ☐ Company press releases
- (8) ☐ Other (explain on Schedule F)

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- (1) ☑ Long term purchases (securities held at least a year)
- (2) ☑ Short term purchases (securities sold within a year)
- (3) ☑ Trading (securities sold within 30 days)
- (4) ☐ Short sales
- (5) ☐ Margin transactions
- (6) ☐ Option writing, including covered options, uncovered options or spreading strategies
- (7) ☐ Other (explain on Schedule F)

5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? .... Yes [ ] No [x]

(If yes, please describe these standards on Schedule F)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

7. Other Business Activities. (check those that apply)

- [ ] A. Applicant is actively engaged in a business other than giving investment advice.
- [ ] B. Applicant sells products or services other than investment advice to clients.
- [ ] C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- [ ] A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- [x] B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- [ ] C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:

- [ ] (1) broker-dealer
- [ ] (2) investment company
- [ ] (3) other investment adviser
- [ ] (4) financial planning firm
- [ ] (5) commodity pool operator, commodity trading adviser or futures commission merchant
- [ ] (6) banking or thrift institution
- [ ] (7) accounting firm
- [ ] (8) law firm
- [ ] (9) insurance company or agency
- [ ] (10) pension consultant
- [ ] (11) real estate broker or dealer
- [ ] (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest?.. Yes [ ] No [x]

(If yes, describe on Schedule F the partnerships and what they invest in.)

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- [ ] A. As principal, buys securities for itself from or sells securities it owns to any client.
- [ ] B. As broker or agent effects securities transactions for compensation for any client.
- [ ] C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- [x] D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- [x] E. Buys or sell for itself securities it also recommended to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

10. Conditions for Managing Accounts. Does the applicant provide investment advisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services *and* impose a minimum dollar value of assets or other condition for starting or maintaining an account?

Yes [x] No [ ]

(If yes, describe on Schedule F)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory account, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. **For reviews**, include their frequency, different levels, and triggering factors. **For reviewers**, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

All client portfolios which are subscribed to Hedgeable's Dynamic Advisor, are tracked through a PHD level technology system daily, and by members of the investment committee daily. These reviewers include Michael Kane- CEO, and Matthew Kane, CTO. All trading alerts from Hedgeable system are manually checked before being e-mailed out to clients. No trading is ever done on behalf of clients. All trading is at the discretion of the client.

B. Describe below the nature and frequency of regular reports to clients on their accounts.

Clients have 24 hour access to their account through the account management screen located upon login. Performance and risk reports are available on a live basis (data may be 15 minutes delayed) versus applicable benchmarks. These reports are for informational purposes only and may not be 100% accurate. Hedgeable does not have custody of any funds or have access to the exact trading done by clients. For exact cash balances and transaction summaries the client must consult with the discount brokerage firm where they executed the transactions.

12. Investment or Brokerage Discretion.

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

(1) securities to be bought or sold? .... Yes ☐ No ☑

(2) amount of securities to be bought or sold? .... Yes ☐ No ☑

(3) broker or dealer to be used? .... Yes ☐ No ☑

(4) commission rates paid? .... Yes ☐ No ☑

B. Does applicant or a related person suggest brokers to clients? .... Yes ☑ No ☐

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4) or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the products, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for product and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? .... Yes ☑ No ☐

B. directly or indirectly compensates any person for client referrals? .... Yes ☐ No ☑

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
- requires prepayment of more than $500 in fees per client and 6 or more months in advance

Has applicant provided a Schedule G balance sheet? .... Yes ☐ No ☑

Schedule F of FORM ADV Continuation Sheet for Form ADV Part II	Applicant: Hedgeable, Inc.	SEC File Number: 801- 70204	Date: 03/08/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hedgeable, Inc.	IRS Empl. Ident. No.: 26-4670323

Item of Form (identify)	Answer
Part II, 1D	Hedgeable offers software as a service to retail investors, high net worth investors, and investment advisors. Offering on Retail Platform (Retail Investors): 1. Free educational resources including text, audio, and video. 2. Free portfolio analytics, alerts and reports. 3. Fee based Portfolio Builder that offers customized ETF portfolios, for $49.99 each. 4. Subscription based proprietary portfolio management system called the Dynamic Advisor, for accounts over $5,000. Hedgeable sends out trade alerts when there is a suggested change in a client's portfolio to reduce the risk for future losses. Hedgeable allows a portfolio of up to 15 S&P 500 stocks and/or ETFs to be used. This portfolio can be one that the user currently has or one that was customized in the Portfolio Builder. The following is the Hedgeable fee schedule for using the Dynamic Advisor. These are recurring payments: Month to Month- $19.99 per month 6 Months- $89.99 1 Year- $159.99 Clients are free to cancel the Dynamic Advisor anytime with one click of a button. If the service is not cancelled, the user will be charged based on the subscription plan selected. Hedgeable offers no refunds for any clients. Offering on Advisory Platform (Investment Advisors and other investors with over $5 million AUM): 1. Dashboard with aggregate risk, performance, biggest winners & losers for unlimited number of portfolios. 2. Dynamic Advisor risk management system for portfolios of stocks, ETFs and mutual funds, with an unlimited account size and unlimited number of securities. 3. In depth portfolio risk, performance, and VaR analytics and alerts. 4. Hedgeable Fund newsletters- long/short, global macro and commodities. 5. ETF Portfolio builder- thematic, endowment, investor clone, Hedgeable tactical, MPT long term diversified. 6. Analysis tools- simulation, correlation, backtest, hedging, dissection, sensitivity, scenarios, event studies. 7. Global market dashboard and market alerts, research center, security center, financial news aggregator, financial television feed.

(Complete amended pages in full, circle amended items and file with execution page (page 1).

Schedule F of FORM ADV Continuation Sheet for Form ADV Part II	Applicant: Hedgeable, Inc.	SEC File Number: 801- 70204	Date: 03/08/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hedgeable, Inc.	IRS Empl. Ident. No.: 26-4670323

Item of Form (identify)	Answer
Part II, 6	Name: Michael Kane Born: 1984 Education Background: Penn State University, Smeal College of Business- 2005, B.S. Finance with Distinction Business Background: 2007 - 2009- Spruce Private Investors- $2 billion absolute return investment advisor and fund of funds that acts as an outsourced CIO for ultra high-net worth individuals and endowments 2006 - 2007 - Bridgewater Associates- $80 billion investment firm, world's largest hedge fund, with clients that include foreign governments, central banks, public pension funds, and endowments
Part II, 8	The CEO of Hedgeable, Michael Kane, obtained his Series 3 License from the NASD and is a member in good standing of the National Futures Association (NFA)
Part II, 9	Hedgeable has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. ALL PROSPECTIVE AND CURRENT CLIENTS HAVE A RIGHT TO SEE OUR CODE OF ETHICS. FOR A COPY OF THE CODE OF ETHICS, PLEASE ASK E-MAIL US AT COMPANY@HEDGEABLE.COM. **PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS** From time to time, representatives of Hedgeable may buy or sell the publicly listed securities for themselves that they also recommend to clients. Hedgeable will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold. Hedgeable has strict guidelines against frontrunning and other violations of SEC trading rules.

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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hedgeable, Inc.	IRS Empl. Ident. No.: 26-4670323

Item of Form (identify)	Answer
Part II, 13	Hedgeable has affiliate marketing agreements in place with several online discount brokers where Hedgeable can earn between $30 - $100 for referring new clients. These deals are completed through third party marketing sites Commission Junction and LinkShare. Links to sites participating in the affiliate marketing program can be found on the "Discount Brokers" page of the Hedgeable site.

(Complete amended pages in full, circle amended items and file with execution page (page 1).

Schedule F of FORM ADV Continuation Sheet for Form ADV Part II	Applicant: Hedgeable, Inc.	SEC File Number: 801- 70204	Date: 03/08/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hedgeable, Inc.	IRS Empl. Ident. No.: 26-4670323

Item of Form (identify)	Answer

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Schedule F of FORM ADV Continuation Sheet for Form ADV Part II	Applicant: Hedgeable, Inc.	SEC File Number: 801- 70204	Date: 03/08/10

(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other Schedules)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Hedgeable, Inc.	IRS Empl. Ident. No.: 26-4670323

Item of Form (identify)	Answer

(Complete amended pages in full, circle amended items and file with execution page (page 1).