

FRONT RANGE ADVISORS, INC.

FIRM BROCHURE

JANUARY 4, 2013

*Front Range Advisors, Inc.
Parque Empresarial Forum
Santa Ana Torre G. Primer Nivel
San Jose, Costa Rica
Phone: (303) 503-7294
Website: www.frontrangeadvisors.com*

This brochure provides information about the qualifications and business practices of Front Range Advisors, Inc. If you have any questions about the contents of this brochure, please contact us at (303) 503-7294. 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.

Front Range Advisors, Inc. is a registered investment adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Front Range Advisors, Inc. is available on the SEC's website www.adviserinfo.sec.gov. You can search this site by a unique identifying number, known as a CRD number. The CRD number for the Advisor is 166331.

2. MATERIAL CHANGES

This ADV Part 2A is Front Range Advisor's initial firm brochure. Therefore, it has no material changes to report.

TABLE OF CONTENTS

Item 1. Cover Page	1
Item 2. Material Changes	2
Item 3. Table of Contents	3
Item 4. Advisory Business	4
Item 5. Fees and Compensation	5
Item 6. Performance-Based Fees and Side-By-Side Management	6
Item 7. Types of Clients	6
Item 8. Methods of Analysis, Investment Strategies and Risk of Loss.....	6
Item 9. Disciplinary Information.....	11
Item 10. Other Financial Industry Activities and Affiliations.....	11
Item 11. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading.....	11
Item 12. Brokerage Practices	12
Item 13. Review of Accounts	12
Item 14. Client Referrals and Other Compensation.....	12
Item 15. Custody	12
Item 16. Investment Discretion.....	13
Item 17. Voting Client Securities.....	13
Item 18. Financial Information.....	13

4. ADVISORY BUSINESS

A. OWNERSHIP/ADVISORY BUSINESS

Front Range Advisors, Inc. (“we” or “the Firm”) was formed as a corporation in the State of Colorado on January 1, 2008. Its principal place of business is San Jose, Costa Rica. The Firm originally serviced as a software provider to the financial services industry. It subsequently became a registered investment adviser under the jurisdiction of the Securities and Exchange Commission in January 2013. The Firm’s owner is Michael K. Hartmann.

B. ADVISORY SERVICES OFFERED

1. Sub-Advisory Services

Front Range Advisors, Inc. offers it portfolios to other Investment Advisers and Investment Companies on a Sub-Advisory basis. The portfolios have been created by applying a proprietary analysis system. The Firm will design individual client accounts using a combination of its six portfolios. The design will take into account a client’s risk tolerance and stated goals.

1. **Active Asset Equity Rotation Strategy** -Uses equity mutual funds to track the relative strength of the economy’s various sectors.
2. **Active Asset Bond/Fixed Income Rotation Strategy**-Uses fixed income mutual funds to track the relative strength of various fixed income sectors of the economy.
3. **U.S. Equity Absolute Return Strategy**-Uses the Firm’s proprietary analysis software to create an equity portfolio that consists of mutual funds that can be leveraged as much as 200% long or 200% short of the equity markets.
4. **U.S. Fixed Income Absolute Return Strategy**-Uses the Firm’s proprietary analysis software to create a fixed income portfolio that consists of mutual funds that can be leveraged as much as 200% long or 200% short of the fixed income markets.
5. **Global Strategic Equity Allocation Strategy**-Uses equity invested mutual funds in buy and hold strategy. The allocations are rebalanced as dictated by the strategy but no less than annually.
6. **Global Strategic Fixed Income Allocation Strategy**-Uses fixed income invested mutual funds in buy and hold strategy. The allocations are rebalanced as dictated by the strategy but no less than annually.

The Firm’s Sub-Advisor services are discretionary-the clients will be asked to sign an investment management agreement that includes a limited power of attorney. The agreement allows the Firm to buy or to sell securities it has selected, within the tolerance agreed to by the client, and in the amounts the Firm deems suited to the agreed upon portfolio structure. By the power of attorney, the client agrees to allow the Firm to place each such trade or move in and out of a portfolio without the client’s prior approval.

2. Consulting Services

The Firm offers consulting services to other investment advisers and investment companies. The consulting services may cover a range of topics from computer programming to investment research. The service is customized to the client's needs.

3. Subscription Research Services

The Firm publishes a monthly newsletter through its secure website. The newsletter includes a market overview and a general analysis regarding specific sectors of the economy and various markets. The newsletter is available by subscription.

The newsletter is for educational purposes only and does not render advice on the basis of specific investment situations for any particular client. As such, the views expressed in the newsletter do not constitute investment advice and should not be interpreted as a recommendation to buy, hold or sell any particular security. Prior to making any investment decision, the services of an appropriate professional should be sought. It is important to know that actual investment decisions made by the Firm may not necessarily reflect the views expressed in the newsletter because the Firm's portfolios are managed with a specific goal and risk tolerance in mind. The Firm has a fiduciary duty to its clients and not to newsletter subscribers, an important distinction.

C. TAILORED SERVICES

The Firm's portfolios are tailored to the extent that a client's assets may be allocated to one or more of the Firm's six portfolios depending on his/her individual portfolio structure. The Firm does not allow clients to restrict the type of securities used in its portfolio management services.

D. WRAP PROGRAM

The Firm does not participate in any wrap programs.

E. CLIENTS ASSETS MANAGED

As of December 1, 2012, the Firm does not manage any client assets.

5. FEES AND COMPENSATION

A. SUB-ADVISORY SERVICES FEES

Fees for sub-advisory services will be a percentage of the assets under management. Fees will be calculated, accrued and due quarterly in advance. The annual fee of 1.00% is negotiable.

Termination of the Portfolio Management Services Fee

A client may terminate the Investment Management Agreement for any reason at any time and within the first five (5) business days after signing the contract, without cost or penalty. Thereafter, the contract may be terminated at any time by giving ten (10) days written notice to the Firm at Parque Empresarial Forum, Santa Ana Torre G. Primer Nivel, San Jose, Costa Rica. Upon termination, each Account will be charged a \$100.00 termination fee and investment

advisory fees will be refunded based upon a prorated number of days that services were rendered after the termination quarter.

B. CONSULTING SERVICE FEES

The Firm's hourly rate is \$300.00 per hour with a minimum engagement fee of \$600. The fee is negotiable at the Firm's discretion. The Firm will provide an estimated fee in the written agreement for services. Hourly Fees will be billed on a monthly basis as they are accrued.

Termination of Consulting Services

A client may cancel the Consulting Service for any reason during the first five (5) days from the date of signing the agreement and will receive a refund of 100% of all fees paid without cost or penalty. To cancel the agreement, a client must notify the Firm and return any materials received to that date. Thereafter, the contract may be terminated at any time by giving written notice to the Firm at Parque Empresarial Forum, Santa Ana Torre G. Primer Nivel, San Jose, Costa Rica. After the first five (5) business days, if a client cancels, any prepaid fees will be refunded on a prorated basis based upon the number of hours worked.

C. SUBSCRIPTION SERVICES

The Firm publishes a monthly newsletter through its secure website. The fee is \$799.00 per year, which is paid annually in advance.

Termination of Subscription Services

A client may terminate the Subscription Service for any reason at any time and within the first five (5) business days after signing the contract, without cost or penalty. Thereafter, the contract may be terminated at any time by giving ten (10) days written notice to the Firm at Parque Empresarial Forum, Santa Ana Torre G. Primer Nivel, San Jose, Costa Rica. Upon termination, fees will be refunded based upon a prorated number of months that the newsletter was sent distributed.

6. PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT

The Firm does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

7. TYPES OF CLIENTS

The Firm offers its services to investment advisers and investment companies. When acting as a Sub-Advisor, the Firm requires a minimum account size of \$50,000.00.

8. METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS

A. METHODS OF ANALYSIS AND INVESTMENT STRATEGIES

The Firm uses a tactical asset allocation approach to selection securities for its portfolios. Tactical asset allocation is defined as an active management portfolio strategy that rebalances the percentage of assets held in various categories in order to take advantage of market pricing anomalies or strong market sectors. This strategy's goal is to create extra value by taking

advantage of certain situations in the marketplace. It is a moderately active trading strategy because the Firm will return to the portfolio's original strategic asset mix when desired short-term allocations are achieved.

In particular, the Firm's tactical asset allocation approach selects securities through a risk/reward valuation. A "best fit" risk profile is developed for each person based on tolerance of market volatility. When deciding on the asset allocation for a portfolio, the Firm studies various market indicators such as financial newspapers and magazines, inspections of corporate activities, research prepared by other advisers, annual reports, prospectuses, filings with the Securities and Exchange Commission and company press releases and other market related filings.

B. INVESTMENT RISKS

All investments bear different types and degrees of risk and **investing in securities involves risk of loss that clients should be prepared to bear.** While the Firm's investment strategies are designed to provide appropriate investment diversification, some investments have significantly greater risks than others. Obtaining higher rates of return on investments entails accepting higher levels of risk. Recommended investment strategies seek to balance risks and rewards to achieve investment objectives. Clients need to ask questions about risks they do not understand. The Firm would be pleased to discuss them.

The Firm strives to render its best judgment on behalf of its clients. Still, it cannot assure or guarantee clients that investments will be profitable or assure that no losses will occur in an investment portfolio. Past performance is an important consideration with respect to any investment or investment adviser but is not a reliable predictor of future performance. The Firm continuously strives to provide outstanding long-term investment performance, but many economic and market variables beyond our control can affect the performance of an investment portfolio.

An investment could lose money over short or even long periods. A client should expect his/her account value and returns to fluctuate within a wide range, like the fluctuations of the overall stock and bond markets. Each portfolio has risks that include:

Active Asset Equity Rotation Strategy:

- *Stock market risk:* The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- *Manager risk:* The chance that the proportions allocated to the various securities will cause the Client's account to underperform relevant to benchmarks or other accounts with a similar investment objective.
- *Non-Diversification or Concentration Risk:* All of the client's funds may be concentrated in investments focused on the same single sector, country or region, leading to highly concentrated exposures, resulting in potentially significantly greater opportunity for gain, and risk of loss, than a broadly diversified portfolio. As a result the strategy's performance may be more sensitive to any single economic, business, political or regulatory occurrence than the value of a diversified investment.

- *International Investing Risk:* Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.

Active Asset Bond/Fixed Income Rotation Strategy:

- *Interest rate risk:* The chance that bond prices overall will decline because of rising interest rates. Interest rate risk will vary for the Firm, depending on the amount of client assets invested in bonds.
- *Non-Diversification or Concentration Risk:* All of the client's funds may be concentrated in investments focused on the same single sector, country or region, leading to highly concentrated exposures, resulting in potentially significantly greater opportunity for gain, and risk of loss, than a broadly diversified portfolio. As a result the strategy's performance may be more sensitive to any single economic, business, political or regulatory occurrence than the value of a diversified investment.
- *International Investing Risk:* Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.

U.S. Equity Absolute Return Strategy:

- *Stock market risk:* The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- *Leverage Risk:* A leveraged mutual fund or exchange traded fund ("Fund") seeks to generate a return that is a multiple (usually 2X or 3X or -2X or -3X) of its benchmark index's performance over a specific, pre-set time period indicated in the Fund's prospectus. That time period is also referred to as the "rebalancing period", and it is generally only one day, although it could be for a longer time period such as a month. As a result, the returns for these types of Funds can differ significantly from that of their benchmark index, over periods lasting longer than the rebalancing period because of the compounding of returns. Generally, the longer the security is held, the more likely the returns of the Leveraged product will differ from the long term return of the index.
Although potential returns are increased by leveraging, so are the potential losses, so these securities carry significant risk. As a result, leveraged and inverse Funds are intended only for sophisticated investors with an aggressive tolerance for risk.

- *Inverse Risk:* An inverse mutual fund or exchange traded fund ("Fund") attempts to mimic the inverse, or opposite, of its stated benchmark. For example, an inverse S&P 500 Fund would attempt to deliver the opposite of the S&P 500's daily performance, net of fees. These Funds, also called "short or Bear Funds" are often in an attempt to profit from a downturn in a given market, sector, or index, or to hedge against a potential loss in their portfolio. Although an inverse Fund does not explicitly use leverage to magnify the intended return, they can suffer from the same compounding effects as the leveraged long and leveraged short Funds.
- *Leverage and Inverse Combination Risk:* Some mutual funds and exchange traded funds allow for the use of both leverage and inverse. The Firm uses a two times leveraged inverse mutual fund. The risk discussed above should be considered. Additionally because the mutual fund used inverse and leverage to magnify the intended return, it can suffer from the compounding effects similar to leveraged long and leveraged short mutual funds.

U.S. Fixed Income Absolute Return Strategy:

- *Interest rate risk:* The chance that bond prices overall will decline because of rising interest rates. Interest rate risk will vary for the Firm, depending on the amount of client assets invested in bonds.
- *Leverage Risk:* A leveraged mutual fund or exchange traded fund ("Fund") seeks to generate a return that is a multiple (usually 2X or 3X or -2X or -3X) of its benchmark index's performance over a specific, pre-set time period indicated in the Fund's prospectus. That time period is also referred to as the "rebalancing period", and it is generally only one day, although it could be for a longer time period such as a month. As a result, the returns for these types of Funds can differ significantly from that of their benchmark index, over periods lasting longer than the rebalancing period because of the compounding of returns. Generally, the longer the security is held, the more likely the returns of the Leveraged product will differ from the long term return of the index.
Although potential returns are increased by leveraging, so are the potential losses, so these securities carry significant risk. As a result, leveraged and inverse Funds are intended only for sophisticated investors with an aggressive tolerance for risk.
- *Inverse Risk:* An inverse mutual fund or exchange traded fund ("Fund") attempts to mimic the inverse, or opposite, of its stated benchmark. For example, an inverse S&P 500 Fund would attempt to deliver the opposite of the S&P 500's daily performance, net of fees. These Funds, also called "short or Bear Funds" are often in an attempt to profit from a downturn in a given market, sector, or index, or to hedge against a potential loss in their portfolio. Although an inverse Fund does not explicitly use leverage to magnify the intended return, they can suffer from the same compounding effects as the leveraged long and leveraged short Funds.

Global Strategic Equity Allocation Strategy:

- *Stock market risk:* The chance that stock prices overall will decline. Stock markets tend to move in cycles, with periods of rising stock prices and periods of falling stock prices.
- *International Investing Risk:* Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.

Global Strategic Fixed Income Allocation Strategy:

- *International Investing Risk:* Investing in the securities of non-U.S. companies involves special risks not typically associated with investing in U.S. companies. Foreign securities tend to be more volatile and less liquid than investments in U.S. securities, and may lose value because of adverse political, social or economic developments overseas or due to changes in the exchange rates between foreign currencies and the U.S. dollar. In addition, foreign investments are subject to settlement practices, and regulatory and financial reporting standards, that differ from those of the U.S.
- *Interest rate risk:* The chance that bond prices overall will decline because of rising interest rates. Interest rate risk will vary for the Firm, depending on the amount of client assets invested in bonds.

Additionally, there are risks associated with active investment management. The fees associated with active management can be higher than those associated with passive management, even if frequent trading is not present. Active investment management strategies can involve frequent trading that could generate higher transaction costs which diminish the portfolio's return. Finally, the short-term capital gains resulting from frequent trades often have an unfavorable income tax impact when a client's funds are held in a taxable account.

9. DISCIPLINARY INFORMATION

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events within the past 10-years that would be material to your evaluation of the Firm or the integrity of its management.

The Firm has no information applicable to this Item.

10. OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

A. BROKER-DEALER AFFILIATIONS

The Firm is not associated with a broker-dealer.

B. FUTURES/COMMODITIES FIRM AFFILIATION

The Firm is not affiliated with a futures or commodities broker.

C. OTHER INDUSTRY AFFILIATIONS

The Firm's owner, Michael Hartmann, is an independent insurance agent. However, Mr. Hartmann does not use his insurance license.

Mr. Hartman is a certified public accountant and does income tax preparation. Mr. Hartmann may recommend these services to the Firm's clients. With the ability to work as a client's certified public accountant and investment adviser representative, this could be viewed as a conflict of interest because each service pays a separate fee or commission. However, Mr. Hartmann attempts to mitigate any conflicts of interest to the best of his ability by placing the client's interests ahead of his own and through the implementation of policies and procedures that address the conflict.

D. SELECTION AND MONITORING OF THIRD PARTY INVESTMENT ADVISERS

The Firm does not use the services of third party investment advisers. This section is not applicable.

11. CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING

A. DESCRIPTION

The Firm's Code of Ethics establishes ideals for ethical conduct upon fundamental principles of openness, integrity, honesty, and trust. The Firm will provide a copy of our Code of Ethics to any Client or prospective Client upon request.

The Firm's Code of Ethics covers all supervised persons and it describes its high standard of business conduct, and fiduciary duty to its Clients. The Code of Ethics includes provisions relating to the confidentiality of Client information, a prohibition on insider trading, a prohibition of rumor mongering, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at the Firm must acknowledge the terms of the Code of Ethics annually, or as amended.

B. MATERIAL INTEREST IN SECURITIES

The Firm, its owners and investment adviser representatives do not have a material interest in any securities.

C. INVESTING IN AND RECOMMENDING THE SAME SECURITIES

On occasion, the Firm's owners and investment adviser representatives may buy or sell for their own accounts securities that are the same as, similar to, or different from those that they recommend to their clients for purchase or sale. Differences can arise due to variations in personal goals, investment horizons, risk tolerance, and the timing of purchases and sales. The Firm attempts to mitigate the conflict of interest to the best of its ability through the enactment of the Firm's code of ethics, trading policies, and its fiduciary responsibilities. Nonetheless, the Firm generally attempts to place client transactions ahead of the owner and investment adviser representative's trades. The associates of the Firm are aware of their fiduciary duty to their

clients and the prohibitions against the use of any insider information. Records of all associates' proprietary trading activities will be kept by the Firm, available to regulators to review on the premises.

12. BROKERAGE PRACTICES

A. RECOMMENDATION CRITERIA

The Firm does not recommend brokerage services. When acting as a Sub-Advisor, the Firm will utilize the brokerage firm of the other Investment Adviser or Investment Company. The Firm does not receive compensation with respect to execution of trades nor does the Firm receive any soft dollars.

B. TRADE AGGREGATION

When available through the other Investment Adviser or Investment Company's custodian, the Firm may trade the same security for multiple accounts. When doing so, the Firm will aggregate orders to a single block order against an average price account. The Firm only uses investment companies (i.e. mutual funds or unit investment trusts) in its portfolios, which means all clients will receive the same end of the trading day price on traded securities.

13. REVIEW OF ACCOUNTS

A. PERIODIC REVIEWS

The Firm's owner, Mr. Hartmann, reviews the holdings of the Portfolios on a weekly basis.

B. OTHER REVIEWS

Additional reviews may be conducted periodically depending on market conditions, economic or political events, or by changes in a Client's financial situation (such as retirement, termination of employment, physical move or inheritance).

C. REPORTS

Clients also receive monthly statements from their custodian. The Firm urges Clients to carefully review such statements.

14. CLIENT REFERRALS AND OTHER COMPENSATION

A. OTHER COMPENSATION

The Firm does not receive extra compensation or any other economic benefit for providing investment advice or other advisory services to Clients.

B. CLIENT REFERRALS

The Firm may enter into agreements with solicitors (referring parties) to refer clients to it. The referral agreements between the Firm and referring parties are designed to comply with the solicitor regulations as set out in The Investment Advisers Act of 1940's Rule 206(4)-3. If a referred client enters into an investment advisory agreement with the Firm, and a cash referral is paid to the referring party, such fee will be paid as a percentage of the client advisory fees that are generated. Typically that fee ranges up to 60% of the client advisory fee with the exact fee

disclosed in the solicitor disclosure document. Written disclosure regarding the referral fees the Firm pays are provided to the client prior to or at the time of entering into the investment advisory agreement. In those states that require solicitors to be licensed or filed as a registered investment advisor, the Firm may require the solicitor to be licensed or filed under its registration.

The compensation to be paid in connection with these agreements is subject to negotiation between the Firm and the referring party. A referral agreement between any referring party and the Firm does not result in any additional charges above the normal level of advisory fees charge to the client. However, these situations may create a financial incentive to recommend one advisory service over another or over other investment advisors and broker/dealer programs, products and services. The representative or an independent investment advisor firm recommending the Firm's programs receives compensation as a result of the client's participation in the programs.

15. CUSTODY

All client funds, securities and accounts are held at third-party custodians. The Firm does not take possession of a client's securities. The client's custodian sends quarterly statements indicating the amount of fees withdrawn from the client's Account. The Firm urges clients to carefully review such statements.

16. INVESTMENT DISCRETION

As previously noted in the description services, all clients who desire to use the Firm's Sub-Advisory sign a client investment management agreement that includes a limited power of attorney allowing the Firm limited discretionary trading power over the account. In discretionary accounts, the Firm will be allowed the power to choose a custodian, place trades, buy or sell securities of any type and in amounts it deems to be appropriate for the account, without first obtaining the client's consent to each trade. Directions will be given to the account custodian to complete the transaction. Clients must use an independent custodian. The Firm does not, and cannot, have custody of clients' assets.

17. VOTING CLIENT SECURITIES

The Firm will not be responsible for responding to proxies that are solicited with respect to annual or special meetings of shareholders of securities held in clients' accounts. Proxy solicitation materials will be forwarded to clients for response and voting. In the event a client has a question about a proxy solicitation, the client should contact his/her investment adviser representative.

18. FINANCIAL INFORMATION

A. BALANCE SHEET

The Firm does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance. Therefore, it is not required to provide a balance sheet.

B. FINANCIAL CONDITION

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about the Firm's financial condition that may impair its services. The Adviser has no financial commitment that impairs its ability to service its clients.

C. BANKRUPTCY

The Firm, its owners and its investment adviser representatives have not been the subject of a bankruptcy proceeding.