

RANGE FINANCE, INC

Form ADV Part 2A

Range Finance Inc.

1775 Tysons BLVD

4th Floor

Mclean, VA 22102

(703) 261-4126

<https://www.range.com>

March 2023

This Brochure provides information about the qualifications and business practices of Range Finance, Inc. If you have any questions about the contents of this Brochure, please contact us at (703) 261-4126 or legal@range.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.

Range Finance Inc. is a registered investment adviser. The 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 Range Finance also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 – Material Changes

This Brochure amendment updates Item 4 to reflect that Range Finance now offers discretionary investment advisory services to clients through one or more Turnkey Asset Management Platforms (each, a “TAMP” or “Platform”). Item 5 has been updated to describe fees associated with the new discretionary investment advisory services.

Item 3 -Table of Contents

Contents

Item 2 – Material Changes	2
Item 3 -Table of Contents	3
Item 4 – Advisory Business	4
Item 5 – Fees and Compensation	7
Item 6 – Performance-Based Fees and Side-By-Side Management	9
Item 7 – Types of Clients	10
Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss Investment Strategies and Methods of Analysis.	11
Item 9 – Disciplinary Information	16
Item 10 – Other Financial Industry Activities and Affiliations	17
Item 11 – Code of Ethics	18
Item 12 – Brokerage Practices	20
Item 13 – Review of Accounts	21
Item 14 – Client Referrals and Other Compensation	22
Item 15 – Custody	23
Item 16 – Investment Discretion	24
Item 17 – Voting Client Securities	25
Item 18 – Financial Information	26

Item 4 – Advisory Business

Introduction.

Range Finance Inc., (the “Firm” or “Range Finance”) previously Pylon, Inc. was formed in December 2020 to provide financial planning and monitoring services online to clients. The principal owners of the business are Fahad Hassan (CEO) and David Cusatis (CTO).

Types of Advisory Services.

Range Finance offers financial planning services by making discretionary and non-discretionary recommendations on a client's financial outlook.

Discretionary Services

Discretionary services are limited to investment accounts managed by Range Finance, through its Certified Financial Planners (CFPs), using one or more Turn-key Asset Management Platforms (TAMPs). Through TAMPs with which Range Finance has entered into an agreement, Range Finance, through its CFPs, provides clients with discretionary investment advisory services through the use of asset management strategies or models offered by third party investment advisors (each third-party investment adviser referred to herein as a “TAMP adviser”). TAMP advisers are subject to review by Range Finance and are subject to future change from time to time. Please consult your CFP for information regarding the available TAMP advisers and their strategies and models.

Discretionary investment clients using TAMP services will have access to one or more TAMPs' fully-integrated platform with a spectrum of investment strategies. Discretionary advisory clients authorize Range Finance to select TAMP investment strategies (pursuant to investment objectives and strategies chosen by the client). TAMP investment strategies may include investments in mutual funds, ETFs, equities, fixed income securities and other securities or may include sub-advisory services of TAMP advisers. With respect to fund investments, clients are referred to the individual mutual fund or ETF prospectus for the risks associated with each specific fund.

Non-Discretionary Services

All other Range Finance services are offered on a non-discretionary basis. Under such customized engagements, Range CFPs offer general advice on clients' investment objectives based on specific questions or general discussions with the client. This relationship is set out in a non-discretionary advisory agreement between Range Finance and the client. The CFP

obtains the necessary financial data from the client, assists the client in determining the suitability of the advisory services and assists the client in setting the appropriate investment objective. The CFP provides periodic investment advice that is tailored to the individual needs of the client based on the investment objective discussed with the client.

This advice may include portfolio construction and optimization advice, as well as advice regarding particular equities (both public and private), bonds, ETFs, mutual funds, and other investments and may include investments held in a client's brokerage accounts, 529 plan accounts, retirement accounts, such as 401(k) and IRA accounts, and other financial accounts.

Range Finance's purpose is to provide guidance to Clients in every aspect of their financial well-being. Not only does Range Finance provide advisory services on portfolio investments, Range Finance also provides feedback and guidance on credit cards, loans, student debt, housing expenses, insurance, and other financial products or services. Therefore, while the primary goal of collecting client information is to provide investment advice in a fiduciary capacity to the client, the Firm also utilizes this information to make recommendations about a variety of financial products (e.g. credit cards, loans, insurance products, and investment opportunities) and services that may aid each client in his or her financial journey.

As it relates to a client's financial planning needs, where appropriate, Range Finance may discuss investment-related products offered by third-party companies. Some of the products and services offered by third-party companies are accessible to clients through the Range Finance platform. Each third-party product or service listed on the Range Finance platform has its own fee model that is explained to clients up front and determined by the third-party company that is offering the product or service. For instance, ETFs and mutual funds that Range Finance may discuss with clients charge their own internal management and administrative fees, which are disclosed in each respective fund's prospectus.

Range Finance only recommends products and services that are determined to be in the best interest of our clients. The client always has the right to decide whether to act on recommendations (for example, with respect to insurance products, savings accounts, or student loan refinancing origination services). If a client decides to implement any recommendation, the client may, but is under no obligation to, utilize Range Finance or one of its CFPs to implement those recommendations.

Client Investment Objectives and Restrictions.

With respect to both discretionary and non-discretionary advisory services, Range Finance tailors any advisory services to the individual needs of its clients. When clients join the platform, they undergo a detailed onboarding process in which information about their

personal and financial lives are captured to best understand their entire financial picture. Part of this process includes clarifying what their short-, medium-, and long-term goals are when it comes to their money. Clients also add any financial accounts, balances, and details that are relevant to their finances by uploading statements, connecting via securely established API-connections with their financial provider (if made available by their provider), or manually entering the data.

Clients are encouraged to ask questions directly within Range Finance's financial platform that are answered by Range Finance's CFPs. Some of these answers may be general recommendations while other answers may be of a more specific nature.

Clients may impose restrictions on investing in certain securities or types of securities. With respect to non-discretionary advisory services, clients always have the choice to accept or reject the advice from Range Finance's financial platform and/or its CFPs. With respect to discretionary advisory services, Range Finance's CFPs will be making selections based on information the member shared and the members risk profile.

Wrap Fee Program.

Range Finance does not participate in wrap fee programs.

Assets under management.

Range Finance provides discretionary and non-discretionary investment advice to its clients. As of the date of this Brochure, the Firm has no discretionary assets under management and no non-discretionary assets under management.

Item 5 – Fees and Compensation

Non-Discretionary Advisory Services

Range Finance offers a flat subscription fee per client for its comprehensive financial planning service. Range Finance's fees for this service is disclosed on its website at www.range.com. The fees are paid directly by clients who sign up for the Range platform online. Range Finance also offers the ability for employers to purchase Range Finance's services for their employees. The fees for employers may be discounted depending on the number of employees that are registered through an employer or the length of the contract an employer chooses to sign. Range Finance will send the employer a written invoice, including the fee, and the time period covered by the fee. Range Finance will send these to the employer concurrent with the request for payment of Range Finance's fees. Range Finance sends an invoice to the employer, who is then able to pay the invoice by check, credit card, or using a third-party online service provider. Partial month services are treated as full month services for all clients. For this service, Range Finance does not deduct any fees from client accounts.

Range Finance's subscription fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which shall be incurred by the client. Clients may incur certain charges imposed by custodians, brokers, third-party investment advisers, and other third parties, such as fees charged by managers, custodial fees, 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. Mutual funds and ETFs also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to Range Finance's fee, and Range Finance shall not receive any portion of these commissions, fees, and costs.

Discretionary Advisory Services

Clients who have signed the discretionary investment advisory agreement will be charged the Range Finance flat subscription fee (described above) and a fee based on the assets under management on the TAMP. Range Finance's fee (the "Range Fee") for this service is based on assets under management and is disclosed on its website at www.range.com. The TAMP advisory fee (the "TAMP Fee") will be deducted from the Range Finance fee based on a fee schedule or other fee arrangement disclosed by the TAMP to Range Finance, Inc. This fee is typically based on the value of assets under management as valued by the custodian of the assets for the account and may vary by TAMP or TAMP adviser. The advisory fee (both the Range Fee and the TAMP Fee) will be deducted from the account by the custodian. A discretionary advisory agreement account may be terminated by a party pursuant to the terms outlined in the discretionary advisory agreement.

If assets are invested in mutual funds, ETFs or other pooled funds, there are three layers of

advisory fees and expenses for those assets. Client will pay an advisory fee to Range, an advisory fee to the TAMP, as well as other fees and expenses as a shareholder of the relevant fund. The mutual funds and ETFs available in the TAMPs often may be purchased directly. Therefore, clients may be able to avoid the Range Fee and TAMP Fee by not using the advisory services of Range and the TAMP and by making their own decisions regarding the investment.

A mutual fund in a TAMP program account may pay an asset-based sales charge or service fee (e.g., 12b-1 fee) that is paid to the broker-dealer on the account. Range is not paid these fees for purchases. TAMP advisers may offer one or more share classes per mutual fund in their investment models or programs. Share classes are different types of mutual fund shares that typically carry different levels of distribution or servicing fees and are available for purchase by different types of investors, and include, for example, "Class I, "institutional," "investor," "retail," "service," "administrative" or "platform" share classes.

Item 6 – Performance-Based Fees and Side-By-Side Management

Range Finance 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).

Item 7 – Types of Clients

Range Finance provides investment advice to individuals and high net worth individuals. There are no requirements for opening or maintaining an account with Range Finance. Prior to engaging Range Finance to provide any of the investment advisory services described in this Brochure, the client will be required to enter into a written agreement setting forth the terms and conditions under which the firm shall render its services.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

Investment Strategies and Methods of Analysis.

As described in Item 4.B., Range Finance formulates investment advice based on the information provided by the client during the initial onboarding survey and subsequent updates to the client accounts with a financial advisor or clients can update information on their own in their accounts as new information comes to light. Range Finance may optimize a client's investment portfolio choices by recommending lower cost investment alternatives, methods of diversifying portfolios, and asset class weights that optimize a client's return per unit of risk. The goal of this optimization method is to achieve efficient frontier portfolios, which offer the highest expected return for a defined level of risk or the lowest risk for a given level of expected return. Clients should note that investing in securities involves risk of loss that Clients should be prepared to bear.

In addition, with respect to clients receiving discretionary advisory services, CFP's have access to various investment strategies offered by one or more TAMPs which they may refer to in determining investment advice that they choose to provide to clients. It is important to note that no methodology or investment strategy is guaranteed to be successful or profitable.

Material Risks of Investment Strategies and Methods of Analysis.

In choosing investment programs utilized by the firm, Range Finance measures and selects strategies based on length and verifiability of track record, the fund manager's tenure and/or overall career performance, the fund management continuity, investment philosophy and process, and other factors believed to affect account performance. Range Finance or the CFP may recommend, on occasion, redistributing investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The advisor may recommend buying or selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, valuation of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client's risk tolerance.

Market Risk

The price of any security or the value of an entire asset class can decline for a variety of reasons outside of Range Finance's control, including, but not limited to, changes in the macroeconomic environment, unpredictable market sentiment, forecasted or unforeseen economic developments, interest rates, regulatory changes, and domestic or foreign political,

demographic, or social events. If a Client has a high allocation in a particular asset class, it may negatively affect overall performance to the extent that the asset class underperforms relative to other market assets. Conversely, a low allocation to a particular asset class that outperforms other asset classes in a particular period may cause that Client Account to underperform relative to the overall market.

Securities/investment vehicles prone to this risk: equities, bonds, ETFs, and mutual funds.

Material Risks of Securities Recommendations

Advisory Risk

There is no guarantee that Range Finance's investment advice about particular securities or asset classes will necessarily produce the intended results. Range Finance and its representatives are not responsible to any client for losses unless caused by Range Finance's breach of its fiduciary duty.

Securities/investment vehicles prone to this risk: equities, bonds, ETFs, and mutual funds.

Foreign Investing and Emerging Markets Risk - Foreign investing involves risks not typically associated with U.S. investments, and the risks may be exacerbated further in emerging market countries. These risks may include, among others, adverse fluctuations in foreign currency values, as well as adverse political, social, and economic developments affecting one or more foreign countries. In addition, foreign investing may involve less publicly available information and more volatile or less liquid securities markets, particularly in markets that trade a small number of securities, have unstable governments, or involve limited industry. Investments in foreign countries could be affected by factors not present in the U.S., such as restrictions on receiving the investment proceeds from a foreign country, foreign tax laws or tax withholding requirements, unique trade clearance or settlement procedures, and potential difficulties in enforcing contractual obligations or other legal rules that jeopardize shareholder protection. Foreign accounting may be less transparent than U.S. accounting practices and foreign regulation may be inadequate or irregular.

Securities/investment vehicles prone to this risk: foreign equities, foreign bonds, and funds that hold foreign equities and/or bonds.

ETF Risks, including Net Asset Valuations and Tracking Error - ETF performance may not exactly match the performance of the index or market benchmark that the ETF is designed to track because 1) the ETF will incur expenses and transaction costs not incurred by any applicable index or market benchmark; 2) certain securities comprising the index or market benchmark tracked by the ETF may, from time to time, temporarily be unavailable; and 3) supply and demand in the market for either the ETF and/or for the securities held by

the ETF may cause the ETF shares to trade at a premium or discount to the actual net asset value of the securities owned by the ETF. Certain ETF strategies may from time to time include the purchase of fixed income, commodities, foreign securities, American Depositary Receipts, or other securities for which expenses and commission rates could be higher than normally charged for exchange traded equity securities, and for which market quotations or valuation may be limited or inaccurate. Range Finance does not use leveraged or inverse ETFs as part of its portfolio construction. A non-indexed ETF can trade at a price above (premium) or below (discount) the share's net asset value. A non-indexed ETF purchased at a premium may ultimately be sold at a discount.

Securities/investment vehicles prone to this risk: ETFs

Inflation, Currency, and Interest Rate Risks - Security prices and portfolio returns will likely vary in response to changes in inflation and interest rates. Inflation causes the value of future dollars to be worth less and may reduce the purchasing power of an investor's future interest payments and principal. Inflation also generally leads to higher interest rates, which in turn may cause the value of many types of fixed income investments to decline.

Securities/investment vehicles prone to this risk: ETFs, and mutual funds.

Technology Risk

Since Range Finance utilizes technological tools to help Clients simulate portfolio performance based on hypothetical allocations, Clients should make note of the following risks associated with using an online interface:

- i. A computer-based portfolio calculator may still make incorrect assumptions about a client's financial situation. There is always a possibility that the calculator may experience technical malfunctions that would cause its recommendations to be inaccurate.
- ii. Clients must not construe the results of Range Finance's computer-based portfolio calculator as investment advice. The calculator is merely a supplemental tool that helps Clients assess their financial situation and evaluate potential investments. Clients should note that the calculator bases its recommendation on the assumption that all the information the Client provided is correct and that there are no other external factors to consider.
- iii. The calculator can only base its output on the input from the client. As such the calculator's output is only as accurate as the data the Client inputs.

- iv. The output that the calculator generates may not assess all of the client's particular situation. Special circumstances, qualitative characteristics, and other intangible components of a client's personal background that are not captured by the calculator may cause the calculator assumption to be wrong.

Clients are highly encouraged to speak with a financial advisor at any time to review their Investment Profile and Client Plan. Range Finance also has procedures for reviewing Client accounts, which is outlined in Item 13 of this Firm Brochure.

ADDITIONAL RISK STATEMENT

The foregoing list of risk factors does not purport to be a complete enumeration or explanation of the risks involved in an investment strategy. Prospective and existing clients are encouraged to consult their own financial, legal and tax professionals in connection with the selection of and investment in a particular strategy or product. In addition, due to the dynamic nature of investments and markets, strategies may be subject to additional and different risk factors not discussed herein. Investing in securities involves a significant risk of loss. Range Finance recommendations are subject to various market, inflation, currency, economic, political and business risks, and such investment decisions may not always be profitable. Clients should be aware that there may be a loss or depreciation to the value of the client's account, which clients should be prepared to bear. There can be no assurance that the client's investment objectives will be obtained and no inference to the contrary should be made. Prior to entering into an agreement with Range Finance, a client should carefully consider: (1) committing to management only those assets that the client believes will not be needed for current purposes and that can be invested on a long-term basis, (2) that volatility from investing in the stock market can occur, and (3) that over time the client's assets may fluctuate and at any time be worth more or less than the amount invested.

Item 9 – Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Range Finance or the integrity of Range Finance's management.

There are no material legal or disciplinary events to disclose with respect to Range Finance or its employees.

Item 10 – Other Financial Industry Activities and Affiliations

Management and employees of Range Finance plan to dedicate substantially all of their professional efforts to Range Finance and currently have no significant outside business interests. Prior to engaging in any outside business activities, employees will be required to pre-clear such activities with Range Finance’s chief compliance officer (the “CCO”) and/or chief executive officer (the “CEO”).

Item 11 – Code of Ethics

Range Finance has adopted a Code of Ethics (the “Code”) that obligates Range Finance and its employees to put the interests of its clients before their own interests and to act honestly and fairly in all aspects of their dealings with clients. All of Range Finance’s personnel are also required to comply with applicable federal securities laws.

Subject to certain exceptions, trades made by employees are reviewed by the CCO. Range Finance requires its employees to pre-clear certain transactions in the personal accounts with the CCO who may deny permission to execute the transaction if such transaction is believed to have an adverse economic impact on the firm’s clients. Any approval will remain in effect for two business days. In addition, the Code prohibits Range Finance or its employees from executing personal securities transactions of any kind in any securities on a restricted securities list maintained by the CCO.

No employee may acquire new issues or securities in a limited offering without first obtaining pre-clearance and approval from the CCO.

All of Range Finance’s employees are required to disclose their securities accounts and transactions, if any, on a quarterly basis and their holdings upon commencement of employment with Range Finance and on an annual basis thereafter. All of Range Finance’s employees are also required to provide brokerage statements quarterly and an annual certification of transactions. Trading in employees’ accounts will be reviewed by the CCO and compared against the restricted securities list.

The Code of Ethics also sets forth Range Finance policy with respect to insider trading by providing: i) a detailed explanation of the rules and regulations that govern insider trading; and ii) policies and procedures that should be carried out by Range Finance employees in the event that there is any question as to the applicability of the insider trading rules.

A copy of Range Finance’s Code of Ethics is available to clients and prospective clients upon their individual request. Range Finance is also committed to maintaining the confidentiality, integrity, and security of its client’s personal information. It is Range Finance’s policy to collect only information necessary or relevant to its management business and to use only legitimate means to collect such information. Range Finance does not disclose any non-public, personal information about clients to anyone except for client servicing purposes and as required by law or regulation. Range Finance restricts access to non-public, personal information about its investors to those employees with a legitimate business need for the information. Range Finance maintains physical, electronic, and procedural safeguards to guard each investor’s non-public, personal information.

Item 12 – Brokerage Practices

The Range Finance platform does not place trading orders or execute transactions on behalf of clients and therefore does not recommend broker-dealers or engage in any soft dollar practices involving the receipt of research or other brokerage service in connection with client transactions.

It is important to note that clients are under no obligation to implement recommendations received pursuant to Range Finance's non-discretionary advisory services or consulting services through Range Finance's offering. Clients should understand that the investment products, securities and services that a CFP recommends as part of financial planning and consulting services may be available to be purchased directly through broker-dealers, investment advisors or other investment firms not affiliated with Range Finance.

Discretionary Advisory Services

In order to receive Range Finance discretionary advisory services, clients will sign a discretionary investment advisory agreement for such purposes and must sign an agreement with the TAMP. Each TAMP requires that clients direct brokerage to a broker-dealer with which the TAMP has a relationship. Clients should carefully review the TAMP's agreement for all disclosures and disclaimers.

Range Finance does not compensate or otherwise reward any brokers for Client referrals.

Item 13 – Review of Accounts

Each account advised by the Firm has investment guidelines set forth in the documentation provided by clients during onboarding and updated from time to time thereafter. It is Range Finance's policy to advise Client accounts in accordance with any objectives and guidelines imposed by the Client. If it is determined that a conflict between the investment goals could arise, Range Finance will immediately contact the client to explain our opinion and collectively determine the proper steps to take.

Each client's account is periodically reviewed no less often than annually for adherence to the clients' objectives, restrictions, and portfolio structure guidelines and to confirm any material changes in their financial profile that would affect Range Finance's recommendations to them.

Intermittent Review Factors

Intermittent reviews may be triggered by substantial market fluctuation, economic or political events, or by changes in clients financial status (such as retirement, termination of employment, relocation, or inheritance).

Clients are advised to notify Range Finance promptly if there are any material changes to their financial situations, investment objectives, or in the event they wish to place restrictions on their accounts.

Client Reports

The Firm provides all Clients with continuous access to their profile via the Range Finance website, where Clients can access their financial profile and investment recommendations. The written reports include the account's valuation and performance. The reports also include a summary of the holdings in a client's portfolio, along with an analysis of the portfolios progress in meeting the clients investment objectives. Clients will also receive periodic email communications describing portfolio performance and product features.

Item 14 – Client Referrals and Other Compensation

Economic Benefits Provided by Third Parties.

Range Finance does not receive any other compensation from third parties (other than clients' employer) for the advisory services the firm provides to its clients.

Compensation to Non-Advisory Personnel for Client Referrals.

Neither Range Finance nor its related persons directly or indirectly compensate any person who is not a supervised person for Client referrals.

Item 15 – Custody

Range Finance does not maintain custody of Client funds or securities. Range Finance does not have access or control over the funds and securities of non-discretionary advisory clients. With respect to discretionary advisory clients, Range Finance only maintains access and control of client funds and securities through its ability to deduct its advisory fees from client accounts.

Item 16 – Investment Discretion

For Range Finance's discretionary advisory services, it assumes limited discretionary investment authority over client assets in the selection of certain investment strategies and models offered through one or more TAMPs.

Item 17 – Voting Client Securities

Range Finance does not have or accept authority to vote Client securities. Range Finance will pass through their proxies or other solicitations directly from their TAMPs. Clients may not contact Range Finance with questions about a particular solicitation.

Item 18 – Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Range Finance’s financial condition. Range Finance has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

Starting in 2023, Range Finance expects to begin collecting advisory fees of more than \$1,200 in fees, six months or more in advance. Therefore, Range Finance will provide clients with an audited balance sheet annually beginning with fiscal year end 2023.