

Range Financial Group, LLC

This brochure provides information about the Range Financial Group, LLC, (“Range Financial Group”) qualifications and business practices. If you have any questions about the contents of this brochure, please contact us at 503-482-4400 or by email at eric@rangefinancialgroup.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any State Securities Authority.

Additional information about Range Financial Group is also available at the SEC’s website www.adviserinfo.sec.gov (select “investment adviser firm” and type in our firm name). Results will provide you both Part 1 and 2 of our Form ADV.

We are an SEC Registered Investment Advisor Firm. Our registration does not imply any level of skill or training. The oral and written communications we provide to you, including this brochure, are for you to evaluate us. Please use this information as factors in your decision to hire us or to continue our business relationship.

ITEM 1 – COVER PAGE ADV PART 2 A

MARCH 31, 2023

CRD #: 290001

7307 SW BEVELAND ST, #110 TIGARD, OREGON 97223

[HTTP://WWW.RANGEFINANCIALGROUP.COM](http://WWW.RANGEFINANCIALGROUP.COM)

(503) 482-4400

ITEM 2 – MATERIAL CHANGES

This brochure, dated March 31, 2023, has been prepared by Range Financial Group to meet SEC requirements. This section will only address material changes that have been incorporated since our last annual posting of this document on the public disclosure website (IAPD) www.adviserinfo.sec.gov. Since that last filing:

- Item 4: Language required under a new Employee Retirement Income Security Act rule related to retirement advice has been added.
- Item 4: Assets under management have been updated.

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ITEM 4 – ADVISORY BUSINESS

4a: Firm Description

Range Financial Group was established in September 2017 by Eric R. Dahm. Our main office is located in Tigard, Oregon.

4a1: Principal Members

Eric R. Dahm, Managing Member: Mr. Dahm may be contacted by email at eric@rangefinancialgroup.com or by telephone at 503-482-4400.

Robert Todd Fankhauser, Member: Mr. Fankhauser may be contacted by email at todd@rangefinancialgroup.com or by telephone at 503-482-4400.

4b: Types of Advisory Services

Range Financial Group offers a variety of investment advisory services to our clients. We work with our clients to identify their investment goals and objectives as well as risk tolerance in order to create an initial portfolio allocation designed to complement their clients' financial goals and objectives. We may create a portfolio, consisting of, but not limited to individual stocks or bonds, exchange traded funds, no-load funds and/or load-waived funds (front-end commissions will not be charged).

Each portfolio will be initially designed to meet a particular investment goal, which Range Financial Group has determined to be suitable to our client's circumstances. Once the appropriate portfolio has been determined, we will review the portfolio and rebalance the account based upon our client's individual needs, stated goals and objectives. Range Financial Group's strategy, generally, will be to seek to meet client investment objectives while providing clients with access to personal advisory services.

Retirement Rollovers & Conflicts of Interest:

If we make recommendations or provide advice related to a retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act ("ERISA") and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

In the event we recommend a client rollover their retirement plan assets into an account to be managed by our firm or (where applicable) recommend the purchase of a retail investment product, such a recommendation creates a conflict of interest because we will be compensated if you follow our recommendation.

To manage this conflict, we operate under a special ERISA rule relating to retirement assets that requires us to act in your best interest and not put our interests ahead of yours.

Under this special rule's provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

While not always the case, a client or prospective client leaving an employer typically has the below four options regarding an existing retirement plan:

1. Retain the assets in the former employer's plan;
2. Rollover the assets to a Traditional IRA or Roth IRA;
3. Rollover the assets to the plan of a new employer; or
4. Receive a cash distribution.

Deciding which of the above options are right for you can be a complex process. For that reason, we will discuss each option after we conduct a careful analysis. Additionally, we provide a written "Retirement Advice Disclosure" to our clients to educate you so you can make a good decision. Please let us know if you did not receive the above disclosure so we can provide it to you.

Some of our employees have professional designations that provide an additional level of investment knowledge in specific areas. Examples of professional designations held by Range Financial Group investment advisor representatives include:

1. Certified Public Accountant (CPA)

The CPA designation distinguishes licensed accounting professionals committed to protecting the public interest. These professionals offer financial statement audits and other attestation services to help inform investors about the financial health of organizations. They provide individuals and families with valuable knowledge and advice on taxes and financial planning. In business and industry, CPAs offer organizations around the world tax, financial reporting and advisory services to drive strategic decision-making and foster growth and success.

To earn the CPA license, accounting professionals must have extensive education—at least 150 hours—pass a rigorous four-part exam and meet experience requirements. They must also commit to lifelong learning and adhere to a strict [Code of Professional Conduct](#) that requires competence, objectivity, integrity and independence.

Further information regarding the CPA designation may be found [here](#).

2. Certified Financial Planner (CFP®)

A CFP® is a well-qualified financial professional who uses various strategies to help clients. CFP®s often analyze a client's current situation and prepares a number of financial reports as part of an overall financial plan. CFP®s may also assist with investment planning, insurance planning, estate planning, income tax planning, and retirement planning.

While many other professional designations concentrate only on investment management, the CFP® focuses on holistic financial planning. In addition, CFP®s stand out because they are fiduciaries, meaning they have a duty to put clients' best interests ahead of their own. For example, they cannot buy financial products for clients for the sole purpose of earning high commissions.

To earn a CFP financial professionals must complete certain education and experience requirements as well as pass a rigorous exam that is distributed by the [CFP Board](#). The goal of this exam is to evaluate their ability to apply financial knowledge to all type of situations.

More information related to the CFP® designation may be found [here](#).

3. Certified Divorce Financial Analyst (CDFA)

Candidates must have a bachelor's degree with three years of on-the-job experience or, if no bachelor's degree, five years of relevant experience. Experience has been defined as the following:

- Financial planning
- Family law practice, or
- Experience in three or more of the following:
 - Tax code
 - Investment advisory or management
 - Real estate, mortgage, and reverse mortgage lending
 - Life and disability insurance
 - Financial therapist or coach

A candidate will have to report their experience and have it approved prior to using the CDFA marks. Experience will be submitted through the candidate's profile and will be reviewed by IDFA staff. Divorce Financial Planning is the application of the discipline of financial planning to settlement strategies in divorce. The process requires the synthesis of tax, insurance, retirement, and other areas of knowledge with their specific application to divorce. The eligibility requirements were established by the Board of Advisors and reflect the fact that this is not an entry-level designation but an advanced program. The examination consists of 150 multiple-choice questions. Candidates have four hours to complete the examination. Candidates must complete the examination with a passing score to receive the CDFA designation.

CDFA candidates will study a broad range of topics regarding the financial aspects of divorce including:

- Overview of divorce laws and procedures;
- Marital vs. separate property;
- Pensions and retirement plans;
- Options for the marital home;
- Fundamentals of child and spousal support;
- Tax issues related to selling or transferring property; and
- Debt, credit, and bankruptcy.

More information relating to the CDFA designation may be found [here](#).

4. Dave Ramsey Smartvestor Pro

To join the SmartVestor program, the pros must:

- Work for investment adviser or broker-dealer firm that are not affiliated with Ramsey
- Have at least two years of experience as a registered investing professional
- Understand [Dave Ramsey's 7 Baby Steps](#)
- Agree to our [Code of Conduct](#)
- Participate in ongoing coaching with us to help maintain our high standards of customer service

The SmartVestor program does not provide investment advice or try to match individuals with a pro based on your individual needs. Nor does not evaluate pros' investing skills or performance or provide training on investing matters.

5. Certified Kingdom Advisor (CKA)

Certified Kingdom Advisor® is a designation granted by Kingdom Advisors to individuals who have satisfied Kingdom Advisors standards that demonstrated themselves to be:

Ability to Apply Biblical Wisdom in Financial Counsel:

By successfully completing the rigorous Certified Kingdom Advisor® coursework and examination.

Technically Competence:

By providing evidence of an approved professional designation (varying by discipline) or by having at least 10 years full-time experience in their discipline.

Ethical Practice:

By agreeing to espouse and practice the [Kingdom Advisors Code of Ethics](#), by maintaining active local church involvement, and by providing pastoral and client letters of reference.

Biblical Stewardship:

By pledging that they practice biblical stewardship in their personal and professional lives and by giving regularly in proportion to their income.

CKA® Disciplines as Defined by Kingdom Advisors:

-Certified Kingdom Advisor® Financial Planner-

Financial planning is the process of determining whether and how an individual can meet life goals through the proper management of financial resources. Financial planning integrates the financial planning process with the financial planning subject areas outlined below by the CFP® Board of Standards

- Financial statement preparation and analysis (including cash flow analysis/planning and budgeting)
- Insurance planning and risk management
- Employee benefits planning
- Investment planning
- Income tax planning
- Retirement planning
- Estate planning

Experience Requirements: 10 years full-time experience OR one of the following professional designations: CFP®, ChFC®, CPA/PFS (Canada: RFP, PFP, CIM, CSWP)

-Certified Kingdom Advisor® Investment Professional-

An investment professional provides professional expertise to the management of investment assets held in retirement accounts, trusts, individual and joint accounts. This type of advisor is registered with the SEC/CSA or State and “flat fee” paid for advice, or they are registered with a Broker Dealer and paid on a commission basis.

Experience Requirement: 10 years full-time experience OR one of the following professional designations: CFP®, ChFC®, CPA/PFS, CFA®, CIMA, AAMS® (Canada: RFP, PFP, CIM, CSWP)

-Chartered Retirement Planning Counselor (CRPC)-

The CRPC® designation program is designed for advisors who wish to provide more comprehensive retirement planning advice to individual clients and families. This program enables experienced advisors, who are focused on retirement planning for individuals, define a “road map to retirement.” There is a focus on clients’ pre- and post-retirement needs, as well as issues related to asset management and estate planning.

Further information regarding the CRPC designation may be found [here](#).

4c: Client Tailored Relationships and Restrictions

As a fiduciary, Range Financial Group always acts solely in your best interests. Your portfolio is customized based on your investment objectives. You may make requests or make suggestions regarding the investments made in your portfolio. Restrictions on trading which, in our opinion, are not in your best interest cannot be honored and if forced may result in the termination of our agreement.

Similarly, you are under no obligation to act upon Range Financial Group's or associated person's recommendations. If you elect to act on any of the recommendations, you are under no obligation to effect the transaction through Range Financial Group or its associated person when the person is an agent with a licensed broker-dealer or through any associate or affiliate of such person.

4d: Wrap Fee Program

Range Financial Group does not sponsor nor provide portfolio management services to a wrap fee program.

4e: Assets under Management (AUM)

As of December 31, 2023, Range Financial Group has \$220,059,964 in discretionary and \$9,877,419 in non-discretionary assets, for a total of \$ 229,937,383 regulatory assets under management.

ITEM 5 – FEES AND COMPENSATION

5a, b & d: Fee Schedules, Payments & Options

Investment Management

Assets Under Management	Annual Fee (%)
Less than \$500,000	1.25%
\$500,001 - \$2,000,000	1.00%
\$2,000,001 - \$10,000,000	0.75%
\$10,000,001 and above	0.50%

The above fee scheduled is “tiered”. An example of “Tiered” is a \$2,000,000 client will pay 1.25% on the first \$500,000 and 1.00% on the remaining \$1,500,000.

For purposes of determining value, securities and other instruments traded on a market for which actual transaction prices are publicly reported are valued at the last reported sale price on the principal market in which they are traded. In certain circumstances, fees may be negotiable.

The fee includes the time and activities necessary to work with your attorney and/or accountant in reaching agreement on solutions, as well as assisting them in implementation of all appropriate documents. We are not responsible for attorney or account fees charged to you as a result of the above activities.

Compensation for our services will be calculated in accordance with what is set in the client agreement. We may modify the terms of any agreement by written changes submitted to the client for signature. While we strive to maintain competitive fees, the same or similar services may be available from other firms at higher or lower fees.

Range Financial Group fees are paid from your account by the custodian when we submit an invoice to them. If there is insufficient cash in your account to pay your fees, an equal balance of securities in your portfolio may be sold to pay our fee. In addition to our fees, there may be custodial, mutual fund or similar third party management fees and charges.

Range Financial Group's, fees are paid quarterly in advance, with payment due within 10 days from the date of the invoice. Our fee is determined by taking the percentage rate we charge, times the market value of the account, divided by the number of days in the year and multiplied by the number of days in the quarter. The market value is the sum of the values of all assets in the account, not adjusted by any margin debit. Fees for partial quarters at the commencement or termination of our agreement will be billed or refunded on a pro-rated basis contingent on the number of days the account was open during the quarter. Quarterly fee adjustments for additional assets received into the account during a quarter or for partial withdrawals will also be provided on the above pro rata basis.

5.d.1: Termination

Either Range Financial Group or our clients can terminate our agreement upon receipt of written notice to the other party, to include written agreement to changes by the client.

When an agreement is terminated, we will refund any pre-paid, unearned fees based on the number of days remaining in the quarter after termination. Refunds will be made within 30 calendar days of the effective date of termination.

When an agreement is terminated, all assets may need to be transferred from the current custodian. You will be responsible for paying all fees including full quarterly custodial administrative fees, account closure fees, mutual fund fees and all trading costs due to the termination. The custodian may assess additional fees for transfer of illiquid investments. If there is insufficient cash in the account, the liquidation of some securities may be used to pay the fees. Prior to termination of an agreement, we can provide a good-faith estimate of these fees.

5c: Third Party Fees

You are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fees, fees, etc.). Those fees are separate and distinct from the fees we charge.

All brokerage commissions, stock transfer fees and other similar charges incurred in connection with transactions for the account will be paid out of the assets in the account and are in addition to the investment management fees paid to us. While we take measures to ensure the fees charged are accurate, it is your responsibility to ensure the amount of fee charged is correct. In addition to statements sent by

us, you will receive statements directly from these brokers, custodians or mutual funds or other investments you hold. We strongly urge you to compare these statements for accuracy.

5e: Other Investment Compensation

Range Financial Group does not accept commission for the sale of securities or other investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

Range Financial Group does not charge advisory fees on the performance of funds or securities in your account.

ITEM 7 – TYPES OF CLIENTS

Range Financial Group generally provides asset management and to the following types of clients:

- Individuals
- High-Net-Worth Individuals
- Pension and Profit Sharing Plans

Minimum Account Size

Range Financial Group does not have an account minimum. However, we may decline to accept clients with smaller portfolios.

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

8a: Analysis

Range Financial Group uses multiple sources of information to obtain analysis and strategies. They include sources such as financial newspapers, financial magazines, research prepared by others, corporate rating services, prospectuses, company press releases, annual reports and filings with the SEC.

8b: Investment Strategies

Range Financial Group utilizes multiple investment strategies to meet your investment objectives. These methodologies are formulated based on a comprehensive review and assessment of your expectations, investment time horizon, risk tolerance level, present investment allocation, and current and projected financial requirements.

Ultimately, each strategy must maximize return within reasonable and prudent levels of risk. Also, the approach taken must provide exposure to a wide range of investment opportunities in various markets while limiting risk exposure through prudent diversification. Finally, the costs of administering and managing the investments related to the strategy cannot be excessive.

8c: Risk of Loss

All investments include a risk of loss. In addition, as recent global and domestic economic events have indicated, performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our control. We use our best efforts and expertise to manage your assets. However, we cannot guarantee any level of performance or that you will not experience financial loss.

Range Financial Group will use our best judgment and good faith efforts in rendering services to you. We cannot warrant or guarantee any particular level of account performance, or that the account will be

profitable over time. Not every investment decision or recommendation made by us will be profitable. You assume all market risk involved in the investment of account assets under the Investment Advisory Agreement and understand that investment decisions made for this account are subject to various market, currency, economic, political and business risks. Except as may otherwise be provided by law, we will not be liable to you for (a) any loss that you may suffer by reason of any investment decision made or other action taken or omitted in good faith by Range Financial Group with that degree of care, skill, prudence and diligence under the circumstances that a prudent person acting in a fiduciary capacity would use; (b) any loss arising from our adherence to your instructions; or (c) any unauthorized act or failure to act by a custodian of your account. Nothing in this document shall relieve us from any responsibility or liability we may have under state or federal statutes.

ITEM 9 – DISCIPLINARY INFORMATION

9a: Civil or Criminal Actions

Range Financial Group and its managers have never been found guilty, convicted or plead no contest to a criminal or civil action in a domestic, foreign or military court.

9b: Administrative Enforcement Proceedings

Range Financial Group and its managers have never been found by the SEC, any other state or federal agency or any foreign regulatory agency to have caused loss of the ability of an investment-related business to do business or been sanctioned, barred or limited in investment-related activities.

9c: Self-Regulatory Organization Enforcement Proceedings

Range Financial Group and its managers have never been found by a self-regulatory agency to have caused loss of the ability of an investment-related business to do business. Additionally, Range Financial Group and its managers have never been found in violation of self-regulatory agencies rules such that they were barred, suspended, limited in advisory functions or fined.

ITEM 10 – OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

10a: Broker Dealers and Registered Representatives

Range Financial Group is not registered as a broker-dealer and our employees are not registered representatives of any broker-dealer.

10b: Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither Range Financial Group nor our employees hold any of the above registrations.

10c: Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

The principal business of Range Financial Group is that of a registered investment advisor. Some of our members may be insurance agents or Certified Public Accountants (CPAs). Employees who are insurance agents or CPAs may also be paid based on these services they provide. In cases where we receive additional payment, there may be a conflict of interest. At all times, you are free to choose an outside agency to avoid the possibility of there being a conflict of interest.

Range Financial Group will disclose any material conflict of interest relating to Range Financial Group, our representatives, or any of our employees which could reasonably be expected to impair the rendering of unbiased and objective advice.

10d: Selection of Other Advisors and How this Advisor is Compensated for those Selections

Range Financial Group is not paid for the selection of other advisors, asset managers or portfolio managers.

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

11a: Code of Ethics Description

Range Financial Group has adopted a Code of Ethics that governs a number of potential conflicts of interest we have when providing our advisory services to you. This Code of Ethics is designed to ensure we meet our fiduciary obligation to you and to stress the importance of a culture of compliance within our firm.

An additional benefit of our Code of Ethics is to detect and prevent violations of securities laws, including our obligations we owe to you.

Range Financial Group’s Code of Ethics is comprehensive, is distributed to each employee at the time of hire, and annually thereafter (if there are changes). We also supplement the Code of Ethics with annual training and on-going monitoring of employee activity. A complete copy of our Code of Ethics will be supplied to you, free of charge, if you request it.

Range Financial Group’s Code of Ethics includes the following:

- Requirements related to the confidentiality of your personal, business and financial information
- Prohibitions on insider trading (if we are in possession of material, non-public information)
- Reporting of gifts and business entertainment
- Pre-clearance of employee and firm transactions
- Reporting (on an on-going and quarterly basis) all personal securities transactions (what we call “reportable securities” as mandated by regulation)

On an annual basis, we require all employees to re-certify to our Code of Ethics, identify members of their household and any account to which they have a beneficial ownership (they “own” the account or have “authority” over the account), securities held in certificate form and all securities they own at that time.

11b, c & d: Participation or Interest in Client Transactions

Range Financial Group or its employees, may buy and sell some of the same securities for our own accounts that we buy and sell for our clients. We will always buy or sell from our clients’ accounts before we buy or sell from our accounts. In some cases Range Financial Group, or its employees, may buy or sell securities for our own accounts and not for clients’ accounts, as it may not meet the objectives or plans for the client.

Range Financial Group will always maintain full disclosure with our clients so that you can make informed decisions. We will always evaluate our activity from the view of our clients to ensure that any and all required disclosures are made. For example, we will disclose anything that would cause you to be unfairly influenced to make any decision regarding actions or inactions in your account.

ITEM 12 – BROKERAGE PRACTICES

12a: Selecting Brokerage Firms

As part of our services, Range Financial Group will recommend a broker-dealer. We have selected our broker-dealers based on price, reliability, speed of processing, tools and “best execution” in addition to other considerations. And while you are not required to effect transactions through any broker-dealer recommended by us, we feel we have made our selections based on a totality of benefits they offer.

Range Financial Group may purchase software, tools, training programs or seminar services from our broker-dealer. Additionally, broker-dealers may provide services, tools or other non-financial benefits to us as a benefit for using the broker-dealer’s services. However, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of the types of benefits discussed above can create a potential conflict of interest by influencing our choice of a broker-dealer.

To avoid creating a possible conflict of interest in recommending broker-dealers, we have established the following restrictions in order to ensure its fiduciary responsibilities:

1. Range Financial Group adheres to our Code of Ethics as outlined in Item 11 above.
2. If Range Financial Group receives separate compensation for transactions, we will fully disclose them.
3. Range Financial Group emphasizes the unrestricted right of you to select and choose your own broker or dealer.
4. Range Financial Group will always act in accordance with all applicable federal and state regulations governing registered investment advisory practices.

12.b: Sales Aggregation

Range Financial Group is authorized to aggregate purchases and sales and other transactions made for your account with purchases and sales and other transactions in the same or similar securities or instruments for other clients of ours. When we aggregate transactions, the actual prices applicable to the aggregated transactions will be averaged, and the account will be deemed to have purchased or sold its proportionate share of the securities or instruments involved at the average price obtained. Stock exchange regulations may in certain instances prevent the executing broker-dealer from delivering to the account a confirmation slip with respect to its participation in the aggregated transaction and, in such event, we will advise you in writing of any purchase or disposition of instruments for the account with respect to any such aggregated transaction. We will direct that confirmations of any transactions effected for the account will be sent, in conformity with applicable law, to you.

ITEM 13 – REVIEW OF ACCOUNTS

13a: Periodic Reviews

Accounts are reviewed by Eric Dahm or qualified staff members. All reviews are either conducted or supervised by Eric Dahm. The frequency of reviews is determined based on your investment objectives, but no less than annually.

13b: Review Triggers

More frequent reviews are triggered by a change in your investment objectives; tax considerations; large deposits or withdrawals; large sales or purchases; loss of confidence in corporate management; or, changes in economic climate.

13c: Regular Reports

All investment advisory clients receive quarterly written reports from Range Financial Group

ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**14a: Economic Benefits Provided by Third Parties for Advice Rendered to Clients**

Range Financial Group does not receive economic benefits from third parties for the advice we render to our clients.

14b: Compensation to Non-Advisory Personnel for Client Referrals

Range Financial Group does not directly or indirectly compensate any person for client referrals.

ITEM 15 – CUSTODY

In certain instances, our clients may grant written authorization to a qualified custodian which provides us with the limited ability to withdraw client's assets, which may be considered a narrow form of custody of client assets. While not required by state law, to ensure clients' interests are protected, Range Financial Group meets the requirements as set forth in SEC guidance under § 275.206(4)-2 regarding this limited authority. With the exception aforementioned custody, Range Financial Group clients' accounts are held by a qualified custodian and other than to withdraw advisory fees, Range Financial Group shall have no liability to the client for any loss or other harm to any property in the account. This includes harm to any property in the account resulting from the insolvency of the custodian or any unauthorized acts of the agents or employees of the custodian and whether or not the full amount or such loss is covered by the Securities Investor Protection Corporation ("SIPC") or any other insurance which may be carried by the custodian. The client understands that SIPC provides only limited protection for the loss of property held by a broker-dealer. As a fiduciary, Range Financial Group will always act in the client's best interests and in doing so, the above does not limit or modify that duty to our clients. Custodial statements will include fees charged by Range Financial Group. We strongly urge you to review the investment advisory fees contained in the custodial statement for accuracy.

ITEM 16 – INVESTMENT DISCRETION

Range Financial Group asks our clients to give us discretionary authority to execute transactions without our client's prior approval. These transactions may include the purchase and selling of securities, arranging for payments or generally acting on behalf of our clients in most matters necessary to the handling of the account.

ITEM 17 – VOTING CLIENT SECURITIES

The clients of Range Financial Group retain the authority to proxy vote. You should ensure that proxy ballots are mailed directly to you by selecting this option on your custodial application forms. You are welcome to

delegate said proxy voting authority to a third-party representative (non-advisory personnel) by filing the appropriate custodial form.

ITEM 18 – FINANCIAL INFORMATION

18a: Balance Sheet

Range Financial Group does not solicit prepayment of more than \$500 in fees per client six (6) months in advance.

18b: Financial Conditions

Range Financial Group has no financial issues that could impair our ability to carry out our fiduciary duty to our clients.

18c: Bankruptcy Petition

Range Financial Group has never been the subject of a bankruptcy petition.
