

Part 2A of Form ADV: Firm Brochure

Item 1 Cover Page

ADV PART II

FIRM INFORMATION

BROCHURE

SINGLE TRACK FINANCIAL, INC.
400 TradeCenter, Suite 5900
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CRD

127318

For further information, please contact Single Track Financial at (781) 939-6830

This brochure has been provided to you as required by the Commonwealth of Massachusetts and the Securities Exchange Commission (SEC). This brochure serves as a replacement to Form ADV Part II. This brochure has not been approved by the SEC or any state securities agency. Registration of an advisor does not imply that the advisor possesses a certain level of skill or training.

Item 2 Material Changes

There are no material changes.

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Item 4 Advisory Business

Single Track Financial, Inc. provides portfolio management, investment advisory, tax compliance, and wealth planning services. The primary mission of the firm is to prudently manage client assets in order to achieve his or her long-term financial goals. The firm specializes in individualized investment strategies that personalize each client's unique situation, needs, and objectives. The investment strategy and portfolio construction are designed for both the client's investment objectives and tolerance for risk.

Item 5 Fees and Compensation

Single Track Financial, Inc. offers investment advisory and management services based on a percentage of assets under management. The structure is as follows:

- Fees for management services are 1.00% of assets under management. Minimum investment for stock and bond portfolios is \$50,000.00, although it reserves the right to waive these minimums at the discretion of management.
- Fees are payable at the beginning of each quarter and are based on the net value of assets under management at the commencement of each quarter. Clients are sent an invoice showing said fees and thereafter such fees are deducted directly from the client accounts.
- Management contracts may be terminated at any time upon written notification. A pro-rated fee will be charged upon termination with the remainder refunded to the client.
- Management clients do not pay for research.
- In addition to Fees paid to Single Track Financial, Inc, clients are responsible for the payment of brokerage fees directly to the stock brokerage firm for trades in their account. Single Track Financial, Inc. does not set the amount of such fees and does not receive any portion of those fees.

Single Track Financial, Inc. provides each client with a separate 'Table of Fees' which details the Firm's fee arrangement in a table format.

Single Track Financial, Inc. provides its clients tax compliance and return preparation at an hourly rate, or in some instances a flat fee.

Single Track Financial, Inc. does not charge performance-based fees.

Single Track Financial, Inc. provides investment management services to individuals, trusts, estates, corporations, and other business entities.

Single Track Financial, Inc. works closely with each client in order to formulate an investment strategy. Once the client's short- and long-term objectives are determined and their risk tolerance is assessed, Single Track Financial, Inc. makes investment decisions based on such information. The firm's process involves the following:

- Single Track Financial, Inc. uses in house research, financial newspapers and magazines, research reports prepared by others, corporate rating services, annual reports, SEC filings, and press releases as the primary sources of information. Security analysis methods used include fundamental, technical, and cyclical techniques.
- Single Track Financial, Inc. use a variety of investment vehicles to implement its investment strategies. These include the following: individual stocks, mutual funds, exchange traded funds, publicly traded limited partnerships, publicly traded real estate investment trusts, American Depositary Receipts, corporate, federal, state, and municipal bonds, and money market funds.
- The valuation of the above investments is all dependent upon a number of factors, including but not limited to, the profitability and success of the company, stock market conditions in general, economic conditions, as well as political and geopolitical considerations. All these factors can affect the value of the investment and will cause fluctuations in value.
- In addition, with bond securities, investments are also subject to the creditworthiness of the entity issuing the debt (bond) and its ability to make interest payments as well as the payoff of the debt on its due date.

All of the above investment products involve risk and can permanently lose value. In certain instances, Single Track Financial, Inc. will purchase Certificates of Deposit for clients. Although the value of the Certificates of Deposit may fluctuate, many times these investments are guaranteed by the FDIC.

During the life of the firm, including the past ten years, neither Single Track Financial, Inc., nor an advisory affiliate has been convicted of or pleaded guilty or no contest to a felony or misdemeanor involving; and investment or an investment-related business, fraud or false statements, or omissions, wrongful taking of property or bribery, forgery, counterfeiting or extortion, or any other felony.

The Director and Advisor, Wayne R. Pastel, is a retired attorney; however, he still provides limited legal services to clients, outside of, separate, and apart from Single Track Financial, Inc.

The President and Managing Director, Richard A. Losanno, on occasion, provides financial analysis and consulting services, to private non-public companies through Rosebud Capital, LLC. Single Track Financial, Inc. does not invest any client funds in any client companies of Richard A. Losanno, Jr. or Rosebud Capital, LLC.

Wayne R. Pastel and or Richard A. Losanno and or their immediate families and related entities, as an individual investor may buy or sell publicly traded securities which Single Track Financial, Inc. may recommend to clients, or may invest in other investments that clients invest in. In such cases, such information is disclosed to the client.

Single Track Financial, Inc. regularly includes "block trades" whereby one stock trade will be made for multiple accounts at once. After the trade is completed, Single Track Financial, Inc. will then allocate the shares to specific accounts. It is not unusual for block trades to have several partial executions at different price within the same trade. On many occasions, Wayne R. Pastel and or Richard A. Losanno and or accounts affiliated with them, will participate in these block trades.

To ensure that all participants in a block trade are treated the same way, it is the policy of Single Track Financial, Inc. that all executions in a block trade are pooled together and then allocated to each participating account.

Single Track Financial, Inc uses Charles Schwab & Co. for custody and execution of trades. Charles Schwab & Co. charges a low fixed to no commission on trades regardless of size.

Single Track Financial, Inc. does not determine the brokerage commission or ticket charges paid on transactions; however, it does review and compare rates of other brokerage firms to confirm that clients are receiving advantageous rates.

Clients receive brokerage statements prepared by and directly from Charles Schwab & Co.

Single Track Financial, Inc. participates in the Charles Schwab & Co.'s Advisor Services program. Single Track Financial, Inc. does not receive any monetary compensation for such participation. However, it does receive, free stock research, analytics tools, and economic analysis from Charles Schwab & Co. as a result of the participation in the programs.

Single Track Financial, Inc. monitors client accounts on an ongoing basis and in conjunction with Charles Schwab & Co.'s Advisor Services portfolio monitoring software. Charles Schwab & Co. provides Single Track Financial's clients with monthly or quarterly statements which detail all securities managed, present value, and change in value since the previous statement.

Item 14 *Client Referrals and Other Compensation*

Single Track Financial, Inc. does not have any arrangements, oral or in writing, whereby cash or some economic benefit is received from a non-client in connection with giving advice to clients.

Single Track Financial, Inc. does not directly or indirectly compensate any other persons or entities for client referrals.

Single Track Financial, Inc's client funds and securities are held and accounted for in separate accounts at Charles Schwab & Co. Advisor Services. Charles Schwab & Co. is a leading discount brokerage and a third-party custodian firm that offers both financial strength and a myriad of investment services.

Single Track Financial, Inc. deducts 'Advisory Fees' directly from these accounts and therefore does have custody of client accounts.

For most clients, Single Track Financial, Inc. will have the authority, without obtaining specific client consent, to determine the securities to be bought or sold, and the amount of securities to be bought or sold, and the broker or dealer to be used for all trades. All accounts having this discretionary authority require a Limited Power of Attorney from the client.

Item 17 Voting *Client* Securities

Single Track Financial, Inc. does not vote client securities.

Single Track Financial, Inc has no financial obligations or conditions that would be reasonably likely to impair its ability to meet its contractual commitments to its clients.

Education and Business Background of Management

Wayne R. Pastel, Esq., LL.M, a Director and Advisor of Single Track Financial, Inc., is a recently retired attorney. Attorney Pastel's law practice concentrated on estate planning trusts, trust administration, probate, tax and tax planning, real estate, and other business and financial aspects of the law.

Attorney Pastel helps guide investment decisions and management of the firm. He graduated with a BA in Accounting, and he obtained his law degree from Franklin Pierce Law Center in 1980. Attorney Pastel also completed a Masters of Laws in Taxation from Boston University Law School in 1981. After working at a Boston law firm for several years, he established and developed a successful, profitable, and growing law firm specializing in the practice of tax law and financial planning. He has represented business, corporate, and high net worth clients in a variety of ways, including implementing sophisticated estate and income tax plans.

Attorney Pastel has obtained his series 6, 63, 65 and 7 securities licenses.

Richard A. Losanno, CFA, CPA, PFS is Single Track Financial, Inc.'s Portfolio Manager and Managing Director. Mr. Losanno is responsible for the firm's investment decisions and operations. He has over twenty years of portfolio management, investment advisory, consulting, and planning experience. He was a founder, principal, and manager of the investment advisory firm Rosebud Capital, LLC. Mr. Losanno has a demonstrated record of success in investment analysis and securities selection. He specializes in equity valuation, financial modeling, asset allocation, and prudent portfolio management. Prior to Rosebud, he was an associate analyst at SunTrust Equitable Securities covering and researching telecommunication equipment companies. Mr. Losanno began his professional career as an investment analyst at Prudential Investments (a division of Prudential Insurance). At Prudential, he was a member of a team responsible for researching equity securities and presenting investment ideas to a group of portfolio managers.

Mr. Losanno has a Master of Business Administration (MBA) from Southern New Hampshire University. He also has earned a Bachelor of Science (BS) degree in Accountancy, summa cum laude, from Bentley University. Finally, he holds the Chartered Financial Analyst (CFA) designation, is a licensed Certified Public Accountant (CPA), and has earned the AICPA's Personal Financial Specialist (PFS) credential.

Mr. Losanno has obtained his Series 65 securities license.

Disciplinary Actions

Single Track Financial, Inc., Attorney Pastel or Richard A. Losanno has not been involved in any arbitration proceedings or any administrative proceeding regarding any investment activities. A client may obtain the disciplinary history of Single Track Financial, Inc, and or its representatives, upon request, from Securities Division of the Commonwealth of Massachusetts.