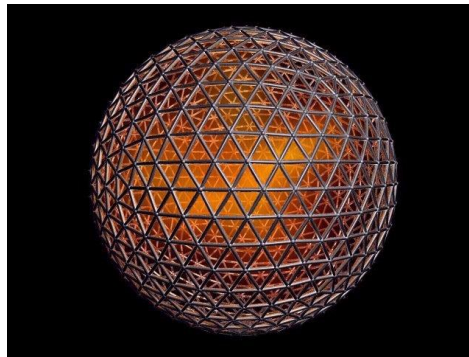


Part 2A of Form ADV: Firm *Brochure*  
Item 1: Cover Page

April 30, 2015



**604 McKnight Park Dr.  
Pittsburgh, PA 15237**

**412-376-9076**

**[www.SFAMoney.com](http://www.SFAMoney.com)**

This brochure has not been approved by any state or the SEC.

## Item 2 **Material Changes**

STAAR Financial Advisors (SFA) is sponsor of a private investment fund, the Strategic Assets Fund 1, LP (SAF 1), organized as a limited partnership. SFA has an advisory and management contract with the Fund with a fee arrangement disclosed in Item 5. SAF 1 is a private limited partnership for accredited investors, which was registered in the state of DE and opened for investment on April 21, 2015.

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**STAAR Financial Advisors, Inc.**

**A STEADY HAND IN UNCERTAIN TIMES**

**Services Provided**

- Investment Portfolio Design
- Investment Portfolio Management
  - Private Management: \$24.5 million under management as of 2/28/2015
    - Individuals
    - Joint Accounts
    - Private Trusts
    - IRAs, 401(k) and other Retirement Plans
  - Institutional Management
    - Mutual Fund Management: \$16.2 million under management as of 2/28/2015
    - Private Equity Fund Management: Starting April of 2015
  - Total Assets Under management (Discretionary): \$40.7 million
- Financial Planning and Advisory
  - Assets Advised, Non-Discretion: Estimated \$4 million
  - Personal comprehensive planning
  - Consulting regarding...
    - Financial products – stocks, bonds, mutual funds, variable annuities, limited partnerships, insurance
    - Private Investment Strategies - including real estate and private companies
    - Business and Entrepreneurial planning
- Professional Services (For other advisors and institutions)
  - Research – stocks and exchange traded funds (ETFs)
  - Model Portfolios
  - Ongoing consultation
- SFAMoney Web Site – SFA has designed a site providing a variety of educational articles, reports, tools and information on markets and securities are provided for clients, do-it-yourself investors and professionals. Access to the site is free to clients. Non-clients and professionals are charged a membership subscription fee.

**FAITH – INTEGRITY – CARE – TRUST**

## Item 5 Fees and Compensation

**STAAR Financial Advisors (SFA) is compensated only by fees as outlined below. (We do not sell securities products for commissions. We work for you!)**

Service	Fee	Discounts When Combined with Other Services
Private Portfolio Management	See Table A Below	See Table B below
Hourly Consultation	\$175/hr	(Up to 3 hours per year at no charge for Private Management Group, 50% discount thereafter. Does not apply to portfolio reporting, review and management, which is included in management fees. 40% discount for STAAR Investment Trust Shareholders with \$50,000 or greater account balance.)
"Fast Track" Financial Planning	\$495	Initial plan at no charge for Private Management Group, subsequent plan updates at 50% discount. 40% discount for STAAR Investment Trust Shareholders with \$50,000 or greater account balance.
"STAAR Base" Service Retainer - Includes up to 2 hours consultation on any financial matters.	\$225 per year	40% discount for STAAR Investment Trust Shareholders with \$50,000 or greater account balance. Included at no extra charge for Portfolio Management Clients.
SFAMoney Web Site	FREE \$49/yr	Basic content and tools. (VIP Memb. FREE to Clients) VIP Membership - advanced content and tools
Professional Services (Research and consultation)	Depends on service	Referring solicitors may receive discounts on professional services. Research hourly or flat fee.

**TABLE A: Fees for Private Discretionary Portfolio Management**

The following fee schedule describes the basic fees charged to managed account(s) regardless of where the assets of the account(s) are invested.

Fee Structure		Paid	
		Annual	Quarterly
First	50,000	1.50%	0.38%
Next	50,000	1.25%	0.31%
Next	150,000	1.00%	0.25%
Next	750,000	0.75%	0.19%
Amts Over	1,000,000	0.50%	0.13%

*New accounts over \$5 million quoted separately.*

**TABLE B: Management Fee Discounts for Accounts using STAAR Funds**

Percentage of Managed Account(s) in STAAR Funds	Discount Applied
Less than 10%	0% discount
10% to 49%	20%
50% to 74%	30%
Over 75%	40%

**TABLE C: Private Equity Fund Mgt** - 1.65% of assets plus 17% of profits above 7% hurdle rate

Fees are billed quarterly and may be paid directly or deducted from the account(s) per client preference. A \$450 set-up fee is required at the time the Agreement is signed. This fee is credited to the first quarter's fees. Other fees that may apply to managed accounts include brokerage fees and commissions and mutual fund expenses. The Advisor does not receive any compensation from these except for its management fees from the STAAR Funds if used by the client.

Note: Associated persons and solicitors of SFA may also be registered representatives and/or insurance agents and sell securities products or insurance independently of SFA.

## Item 6 **Performance-Based Fees and Side-By-Side Management**

There are Performance Fees in connection with Private Equity Fund management as disclosed in Item 5. Potential conflicts of interest exist where an adviser manages different types of accounts with different fee structures. STAAR Financial Advisors, Inc. has a fiduciary obligation to place client interests above its own. SFA makes every effort to make sure that any conflicts of interest do not affect one account over another and that all accounts receive appropriate attention and are managed according to their objectives.

## Item 7 **Types of Clients**

STAAR Financial Advisors (SFA) is equipped to serve the following types of clients:

### **INDIVIDUALS AND FAMILIES**

- Taxable Individual and Joint Accounts
- IRAs and Roth IRAs
- Employer-Sponsored Retirement Plans (advice regarding or management of choices): 401(k), SIMPLE IRA, 403(b) and other defined contribution plans.
- Revocable Living Trusts, Grantor Trusts and Charitable Remainder Trusts
- Private Foundations

Minimum Account(s)\* Size for Discretionary Management: \$200,000

### **INSTITUTIONS**

- Mutual Funds: Management and Sub-management
- Private Equity/Placement Funds
- Endowments
- Foundations
- Pensions: Corporate, Government and Non-Profit

Minimum Account(s)\* Size for Discretionary Management: \$1 million

### **PROFESSIONALS**

SFA may provide research and consultation to other advisors on a fee basis.

\* With approval of the Advisor, multiple accounts may be aggregated to reach the minimum. In start-up or other situations, the Advisor may waive minimums.

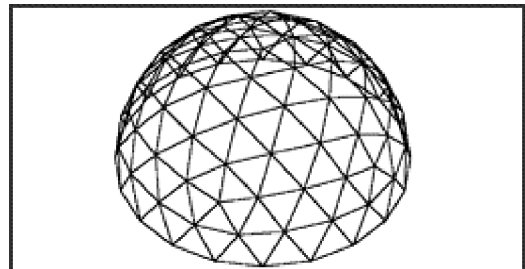
## **INVESTMENT STRATEGIES AND METHODOLOGY**

### **The STAAR Solution**

“STAAR” is an acronym for Strategic and Tactical Asset Allocation Resource. Over the years we have heard many investment philosophies espoused. Passive Asset Allocation; Buy and Hold; Dollar-Cost-Averaging; Efficient markets; Elliott Waves; Fibonacci Sequence; Value investing; Growth Investing; Market Timing; Technical Analysis; Fundamental Analysis; Dart Boards and Monkeys. At any given moment in time one of these might look like genius. But over long periods of time three main categories stand out and if used in a synergistic manner will offer the best of possible worlds.

### **A Triumvirate Blend of Philosophies**

- **Technical Analysis**
- **Fundamental Analysis**
- **Asset Allocation**



“A threefold cord is not easily broken”

Each of these philosophical disciplines has significant merit. But each by itself is inadequate.

All three together provide a strong structure for Strategic and Tactical investing. The STAAR Solution pays attention to different disciplines and applies sound principles in making decisions in constantly changing economies and markets. And other theories and disciplines can be used to complement these.

No system is perfect. We assume imperfection. Ours is an open approach that seeks to continually learn from long-term and near-term history.

Our goal is to meet each client’s objectives effectively and efficiently.

Our number one goal is to avoid the BIG MISTAKES. We have been successful in this mostly due to some basic portfolio rules. These include:

- If we can’t understand how an investment works within 20 minutes, we should probably avoid it.
- If it involves leverage it is suspect and greater care taken.
- If there is not enough independent third-party information and verification, it is suspect.
- If it doesn’t make sense, it is suspect.
- If it looks too good to be true... well, enough said.

Factors considered in the initial and ongoing management include:

- Overall Situation and Objectives of the Client
- Types of Accounts and Taxes
- Liquidity and Income needs
- Asset classes and types consistent with objectives
- Market conditions and trends
- Risk/reward identification
- Technical analysis of trends in overall markets and individual securities
- Fundamental analysis of general economy, industries and countries and existing securities
- Evaluation and choice of potential individual public and private investments

In deciding to buy, hold or sell a particular stock, bond, exchange traded fund, mutual fund, or private company or properly, the manager considers a number of factors, including:

- Economic and market trends – long term and short term
- Underlying securities in a fund
- Financial condition of companies and properties
- Intrinsic value of a companies and properties
- Products and services in relation to sectors and competition
- Management
- Market factors affecting companies
- Risks relative to markets and sectors

When choosing mutual funds, a fund and its manager's history is considered, as are expense ratios, current holdings and management style. If a mutual fund fails to perform up to expectations, it may be sold.

The manager considers tax implications of actions taken, though such considerations are secondary to other management criteria. The advisor will generally try to make transaction in tax deferred or non-taxable accounts first and then in taxable accounts. However, overall total return is the primary objective and supersedes tax considerations..

## **RISK OF LOSS**

Portfolio risks depend upon the type of portfolio selected, the securities selected and the decisions of the Advisor. No investment is 100% free of risk and it is possible to lose money in a STAAR Financial Advisors managed portfolio. Among the risks investors may experience when investing with STAAR Financial Advisors are:

### **Risks associated with investing in fixed income instruments (Bonds, CDs, savings accounts and money markets):**

*Credit Risks* -- There is a risk that an issuer of fixed-income or debt securities will not make timely payments of principal and interest. If an issuer entered bankruptcy, interest payments would likely stop all together and the bondholder would have to wait until the bankruptcy proceedings were concluded to find out how much (if any) of the amount invested would be returned to the investor. Government guarantees are limited in amounts and by the length of time required to honor backing guarantees. Governments themselves are subject to bankruptcy.

*Credit Rating Changes* -- Independent organizations rate the creditworthiness of bond issuers. A high rating means the issuer is considered to be sound financially and presents a low risk of default. If an issuer's rating is lowered, this will tend to have a negative impact on a bond's price.

*Bond Market Risks* -- Investing in bonds may involve risks that affect the bond markets in general, such as general economic conditions and adverse changes in interest rates. The value of bonds can go up and down (volatility) with changes in interest rates, changes in the economy, government policy changes, and other market-driven dynamics.

*Income is affected when Interest Rates Change* -- The income per share could decrease when interest rates fall.

**Risks associated with investing in equity instruments (stocks, partnerships and direct private investments):**

*Stock Market and Private Placement Risks* -- Investing in equity securities carries stock market risks and significant fluctuations in price – if the stock market declines in value, a Fund is likely to decline in price. Another risk associated with investments in equity securities is that of a company being unable to perform as anticipated due to factors such as poor management, weak demand for its products and less than anticipated earnings.

*Interest Rate Changes* -- The value of bonds is directly affected by changes in interest rates. When interest rates go down, the value of bonds goes up, and when interest rates rise, the value of bonds goes down. Generally, bonds with shorter maturities are affected less by interest rate changes than those with longer maturities; therefore, the longer the maturity, the greater the change in value when interest rates go up or down.

*Liquidity Risk* -- Certain kinds of investments, especially investment in private companies or property may not have a market in which they can be easily sold.

**Risks associated with markets and general management:**

*Market Risk* – Markets can experience significant fluctuations in value caused by the buy and sell decisions of many investors.

*Investment Risk* -- Regardless of the direction of the overall market, an individual company can experience financial difficulties or even bankruptcy. Problems with individual companies can adversely affect the Fund's value even in an "up" market.

*Foreign Investment Risks* -- Investing in foreign securities involves risks such as adverse political, social, political and economic developments, different regulations to which companies are subject, currency fluctuations, limited information about the foreign companies, less liquidity in foreign markets and less protection for the shareholders in the foreign market.

*Emerging Markets Risks* – Investments in less mature economies can be exposed to greater risks due to smaller and less liquid markets, less stable political environments and less developed economic policies and controls. Emerging markets can be more volatile, experiencing greater "ups and downs" than mature markets.

*Risks of Investing in Funds* -- There are certain risks associated with the character and mechanics of mutual funds. Shareholders do not control investment transactions and decisions made by managers determine performance. Transactions cause tax events that are passed through to shareholders.

*Risks of Investing in Commodities* – Commodities can be volatile and depending on how they are owned, liquidity can be limited.

*Risks of Investing with Leverage* – While STAAR Financial Advisors does not manage margin accounts, certain funds, including ETFs used by the Advisor may from time to time employ leverage (borrowing to buy securities). To the extent borrowing is employed, risk is increased.

*Risks of Investing in Derivatives* – Derivatives are financial instruments that derive their value from other assets. Options (including calls and puts) and futures are examples of derivatives. STAAR Financial Advisors generally keeps derivative to a minority of a portfolio's value, i.e. under 20% unless the client requests a larger position.

*Risks Associated with Frequent Trading* – Frequent trading can expose investors to increased transaction costs, tax events and increased volatility. STAAR Financial Advisors seeks to minimize frequent trading and generally makes purchases with the intent of holding positions longer than three months and ideally for more than one year.

*Changes in Tax Laws* – Legislation could be introduced by both the state and Federal governments and legislatures, which if enacted, could adversely affect taxation of investment earnings.

*Management Risk* -- There is a risk that the adviser's research, analysis techniques and strategies or used by the investment adviser and/or the investment adviser's selection of securities may fail to produce the intended results. The death or disability of a manager could affect performance negatively.

Apart from the risks outlined above, the Advisor's management practices do not involve any significant or unusual risks.



Item 9     **Disciplinary Information**

There have been no disciplinary penalties in the past; nor are any pending.

Item 10    **Other Financial Industry Activities and Affiliations**

STAAR Financial Advisors (SFA) has no affiliates except for the STAAR Investment Trust mutual funds and the Strategic Assets Fund 1 or other industry activities except as described above.

Item 11    **Code of Ethics, Participation or Interest in Client Transactions and Personal Trading**

STAAR Financial Advisors (SFA) has adopted, along with the STAAR Investment Trust, a joint code of ethics, which can be obtained upon request by writing to SFA at 604 McKnight Park Dr, Pittsburgh, PA 15237. This code of ethics is shared with the STAAR Funds.

In summary the Code of Ethics covers the following areas:

- General Fiduciary Principles
- Objective and General Prohibitions – covers fraud, untrue statements, manipulative practices.
- Prohibited Transactions – includes prohibitions against access persons purchasing IPO's or buying or selling securities owned by the STAAR Funds or other clients unless pre-approved and reported to the firm. Pre-clearance procedures are included.
- Certifications and Reports by Access Persons – requirements are included for such persons to provide quarterly reports of all personal securities transactions and annual certifications as to securities held.
- Additional Prohibitions – Including confidentiality of client information, reporting and approval of outside business activities, and prohibition on receipt of gratuities or gifts.

SFA does not conduct any direct transactions with client accounts. It does not buy or sell directly to or from clients. It does not lend or borrow securities to client accounts.

In addition to the pre-certifications and reporting noted above SFA has adopted the following procedure for trading by managers and access persons for their personal accounts: Trades for clients are to be placed prior to personal trades, except where all client trades are included in one block trade.

SFA recognizes that there are certain conflicts of interest that may arise in its advisory and management activities. SFA makes every effort to disclose those when they might affect clients and it keeps a written log of conflicts as they arise and describes how those conflicts are managed.

## Item 12 **Brokerage Practices**

STAAR Financial Advisors (SFA) recommends broker-dealers. The selection is based upon a number of factors, including, but not limited to:

- Transaction costs
- Ability to achieve best execution
- Account fees
- Provision of efficient on-line trading services, platforms and reports
- Product selection
- Advisor support
- Research resources
- Overall convenience and efficiency for both the client and the Advisor

SFA generally aggregates trades where possible for purposes of efficiency. This may or may not result in a lower transaction cost to the client account. SFA attempts to make transactions in a manner that minimizes overall costs.

Clients are not required to use the SFA-recommended broker-dealer(s) and may request their account(s) to be held elsewhere. Where a client requests another broker-dealer, the advisor may be unable to obtain the most favorable execution of the client's transactions and directing brokerage may be more costly. SFA may decline to manage any account where it may experience difficulties in trading or excessive costs.

Where a broker refers clients to SFA, the broker's brokerage firm will normally be used for the client account(s). The client may experience higher costs where such an arrangement exists. Upon execution of a solicitor's agreement with broker-dealer that is also a registered investment advisor, SFA may pay a percentage of fees back to the broker-dealer for referrals. However, the overall fee charged to the client will be the same whether a broker-dealer is involved or not.

SFA does not participate in any soft dollar or other arrangements whereby larger commissions or fees are paid to broker-dealers than would be charged to any other customer.

## Item 13 **Review of Accounts**

STAAR Financial Advisors (SFA) periodically reviews accounts for which it has discretionary authority. Internal reviews may be triggered by market conditions or events or by changes in the SFA's recommendations regarding specific securities or funds. A general internal review of clients accounts is undertaken monthly or more often when conditions warrant. SFA provides written quarterly reports and recommends in-person reviews with clients no less than annually. Clients may express needs or concerns at any time that cause SFA to review the account(s) and/or to make portfolio changes.

Item 14 **Client Referrals and Other Compensation**

SFA may enter into agreements whereby other registered investment advisors or firms may be compensated for client referrals with a percentage of the fees paid by the client. The fee structure is the same whether a referral is involved or not. SFA provides the client with disclosure regarding any referral arrangements related to the client account(s).

SFA pays 35% of the fees generated from referrals. If referrals result in over \$10 million of assets under management, a bonus may be paid each year average referred assets under management exceed \$10 million.

Item 15 **Custody**

STAAR Financial Advisors (SFA) does not maintain custody of client assets. Clients receive independent statements directly from the institutions that hold their assets, which can be used to compare with portfolio reports provided by SFA.

Item 16 **Investment Discretion**

The client gives STAAR Financial Advisors (SFA) limited power of attorney to make transactions for the client on a discretionary basis. The powers are generally unlimited as to the purchase and sale of securities within portfolio accounts. Discretion is limited within the portfolio parameters selected by the client.

For example, if a client selects a "balanced" portfolio type, portfolio rules require that no less than 20% of the portfolio must be in interest-bearing instruments such as bonds, CDs and money markets. When the advisor ascertains that less than 20% is in such instruments, the advisor will take action to bring the portfolio into compliance with the portfolio rule.

Clients may request other limitations, including the kinds of securities that may or may not be used. Unusual limitations must be in the form of written agreement.

Item 17 **Voting Client Securities**

Except on occasion for the STAAR Funds, the Advisor does not vote client securities. Client positions are held in third-party accounts and the clients receive proxy materials. While the client may consult with the Advisor regarding voting issues, the client is responsible for voting.

Item 18    **Financial Information**

STAAR Financial Advisors (SFA) does not require advance payment of management fees greater than \$1,200 per year per client and therefore is not required to provide an audited balance sheet.

Item 19    **Requirements for State-Registered Advisers**

STAAR Financial Advisors (SFA) is an SEC-Registered firm. As a Pennsylvania domiciled firm it provides the Pennsylvania Securities Commission with copies of its SEC registration.