

Investment Advisor Information

The Investment Advisor, STAAR Financial Advisors, is registered with the SEC and applicable state securities commissions (including home state of PA) under SEC File Number 801-35817. The following information is included on the Uniform Application for Investment Adviser Registration, form ADV Part II, as filed, including amendments, with the above-mentioned commissions. This brochure is provided to clients and interested parties in lieu of form ADV II.

Business is conducted under the name STAAR Financial Advisors, Inc., the principal place of business being 604 McKnight Park Dr., Pittsburgh, PA 15237, phone #412-367-9076. Hours are generally 9 A.M. to 5:00 P.M., Mon.- Fri., though evening hours can be arranged. The adviser provides investment management services estimated to be about 90% of advisory income and on more than an occasional basis, furnishes advice by consultation or on matters not involving securities (approximately 10% of income). These services may be referred to as "financial planning".

Types of clients include Individuals, Investment Companies, Pension/Profit Sharing Plans, Trsts, Estates, Charitable Organizations and Business Entities.

The Adviser charges fees for asset management and financial planning services. Fees are negotiated based on services desired and are sometimes quoted as a flat fee, a base rate plus a time increment, an hourly fee or as a percent of assets under advisement. The ordinary hourly fee is \$145 per hour. An estimate of the total cost of the planning services requested is disclosed to the client before the plan or service is undertaken. Discounts or certain free services may be offered where more than one service or product is purchased through the adviser or one of its employees or solicitors.

In general, the adviser's services include gathering pertinent financial data, discussing and defining financial objectives and developing plans to attain those objectives. They may include, but are not limited to, net worth and cash flow analysis, tax saving ideas, risk analysis and insurance policy review, employee benefits analysis, portfolio review, asset allocation & investment advisory services, future value projections, estate planning review and specific recommendations. Advisory services may also include specific recommendations regarding the purchase and sale of securities.

The adviser also provides investment advice for investment companies pursuant to written agreement. Fees are generally assessed monthly based on a percentage of assets under management during the prior month. The adviser is manager of the six STAAR Investment Trust Funds, founded by the applicant.

A minimum asset size of \$100,000 is required to begin a discretionary managed account. No minimum dollar value of assets or other conditions are imposed for advice or planning provided on an hourly or flat quoted fee.

Generally a deposit of 40% (not to exceed \$475) of the quoted fee will be payable to STAAR Financial Advisors at the time of the signing of the service agreement, with the balance to be paid upon

completion and delivery of the initial financial plan. This is negotiable, and consideration may be made for clients who wish to pay in installments. Where an hourly fee is quoted, a deposit equal to one hour's fee is required in advance.

Either the client or the adviser may cancel the service agreement by providing written notice to be received within five business days of signing. If the applicant cancels the agreement within this period, all moneys paid by the client will be refunded except for a \$35 processing fee. After the five-day period, any cancellation by the client before completion and delivery of the initial plan will result in a refund of moneys paid less a non-refundable minimum start-up fee of 50% of the quoted fee for the initial planning service. In the case of hourly consulting, the client will be liable for the full fee on services rendered up to the time cancellation notice is received. Cancellations must be in writing and signed by the client.

A client may utilize qualified personnel or solicitors of the adviser in the capacity of insurance agent or registered representative. Certain personnel or solicitors of the adviser may also act in sales and receive commissions for products, but not pursuant to the advisory contract. There is no obligation on the client's part to place any financial products with any person employed by or connected with the adviser.

The adviser generally provides advice to individuals, pension and profit sharing plans and corporations or business entities. The adviser offers advice regarding exchange-listed securities, securities traded over-the-counter, corporate debt securities, certificates of deposit, municipal securities, variable life insurance, variable annuities, mutual fund shares, U.S. government securities and limited partnerships investing in real estate, oil & gas and equipment leasing.

The adviser uses brokerage firm reports and analyses as well as industry-directed publications and reports. The adviser also uses technical analysis software to identify trends in markets and specific securities. The applicant generally uses a conservative approach focused on the client's objectives and situation, with emphasis on diversification and value identification for long-term accumulation. Asset allocation principles with reference to long-term historical perspective are considered along with targeting investment product categories to specific objectives and time frames.

The main sources of information used include financial newspapers and magazines, research materials prepared by others and annual reports, prospectuses and filings with the SEC. Generally, investment strategies used include long-term purchases (securities held at least a year) and short-term purchases (securities sold within a year).

General standards of education and experience include a college degree and one or more of the following designations or licenses: Certified Financial Planner, Chartered Financial Consultant, Chartered Financial Analyst, Securities Series 7 (or equivalent) and Series 65 and such person(s) must also meet all requirements of the SEC and state regulations regarding financial planners and investment advisors. Additionally, such person(s) is (are) also expected, though not required, to have at least two years experience in a financial services field such as insurance, securities, banking, accounting, real estate or other related business.

There is no formal investment committee or group. General investment advice is given as part of the financial plan as well as part of an investment program developed in relation to the objectives of any specific funds of investment companies. Investment allocation advice may be given separately from any comprehensive written plan. A qualified adviser oversees any and all recommendations contained in the plan or service.

The President and Chief Compliance Officer of STAAR Financial Advisors, Mr. J. (John) Andre Weisbrod, received a bachelor's degree in graphic design from Ohio University (1971) and the Chartered Financial Consultant professional designation from the American College (1986). He has been an insurance agent since 1981 and was an NASD Registered Representative from 1983 through 2007. His background includes product management with Sea Breeze Laboratories and Clairol (1977-80), youth ministry with Young Life (1971-76) and writing/publishing/speaking.

Members of the Adviser's staff or any associated persons (other planners/advisers listed with the Securities & Exchange Commission as "associated persons") may be licensed to sell insurance and investment products (including life, health and disability insurance, mutual funds, variable annuities and stocks, bonds and limited partnerships). Currently, no one on the adviser's staff is registered as a representative of any broker-dealer. The President of the Adviser maintains a license for health, life and accident insurance. Insurance activities are estimated to take less than 3% of the President's time. On an occasional basis, pension administration services and other services are obtained from outside firms.

The adviser may use solicitors for planning services who are also insurance agents and/or registered representatives or other registered investment advisers. Such solicitors may receive commissions from financial products if the client chooses to place such products through the solicitor or advisor. The fact that commissions will be received will be disclosed.

A solicitor's fee generally from 15% up to 40% of the normal planning or service fee, depending on the type of service, may be given to solicitors (agents) who have entered into written agreements with the adviser and who are qualified under regulations. Some services, especially where the solicitor does most of the compilation work, allow for a higher percentage to be paid to the solicitor.

Where the applicant provides investment management and advice and/or other services for a fee expressed as a percentage of assets under advisement, the solicitor may receive a commission also expressed as a percentage of the assets under advisement. Such fees are negotiated based on the overall fee percentage and types of services provided to a particular client, and are paid out of the fees received by the advisor and are not added to those fees.

The adviser or its officers or planners may from time to time buy or sell for themselves securities that they also recommend to clients. Any planner employed by the adviser is required to report such transactions to the adviser. The adviser has a policy that, in purchase or sale transactions, the client's account will be traded first.

STAARSM Financial Advisors, Inc.

The Applicant has created and maintains a Code of Ethics, which is available upon request. The Code of Ethics covers, among other items, General Fiduciary Principles, Prohibited Transactions, Pre-clearance Procedures, and Certifications & Reports by Access Persons.

The President or a qualified adviser reviews client accounts and plans. The adviser's staff is involved in data input and revision. Other insurance and/or investment sales people may be involved in fact-finding, but only the adviser does the plan. The client's attorney or accountant or ones recommended by the advisor may be utilized when appropriate for legal and tax matters. Accounts are generally reviewed annually, more or less frequently based on a client's needs and desires. Plans may

include, but are not limited to: net worth statement, cash flow analysis, estate planning, tax planning, retirement planning, asset allocation, insurance risk analysis and education needs analysis. Reviews can be triggered by pre-set calendar dates, client request or if changes in life situation or market/economic/product conditions warrant.

In addition to regular statements from brokerage firms, mutual funds and other institutions, Private Management Accounts under discretionary management receive quarterly reports showing positions, cash flow and performance.

Clients may use a broker-dealer from the Adviser's recommended list, but is under no obligation to do so. The commissions on products purchased from recommended broker-dealers may or

may not be higher than those charged by other brokers.

If a client elects to use one of the adviser's solicitors in the capacity of investment broker, such persons may receive commissions from insurance companies and/or a broker-dealer for any financial products sold to the client. Other benefits, such as computer programs, educational programs and expense allowances may be also provided by such institutions.

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STAAR Financial Advisors, 604 McKnight Park Dr.,
Pittsburgh, PA 15237 412-367-9076

STAAR Fee Schedule

Asset Management	<i>Fees are expressed as an annual percentage rate of the average account balance. Fees are generally calculated either quarterly or semi-annually. Average balance may be computed by averaging the beginning and ending balances plus the end of month balances between the beginning and ending balances. Multiple service discounts may be available.</i>
Private Account Management – <i>Discretionary management of investments. Certain planning and reporting services may be provided at no extra charge for privately managed accounts. In particular, account reporting and consultation regarding investment strategies and allocation are included.</i>	First \$50,000: 1.50% Next \$50,000: 1.25% Next \$150,000: 1.00% Next \$750,000: .75% Thereafter: .50% Minimum Quarterly Fee: \$187.50 <i>Discounts are applied to accounts using STAAR investment Trust Funds for some or all of their asset(s). A detailed explanation of cost structure is available upon request.</i>

Consulting & Planning Fees

Description	Fee	Discounts Fees may be discounted for multiple services or if you are a Private Management Group Client or have investments in the STAAR Investment Trust Family of Funds. Certain planning tools will be provided on the STAAR web site at discounted fees, depending on the need or for a professional planner or asset manager to review your information.
Hourly Consulting/Planning	\$145/hr	
“Independence Day” Plan	\$475	
“STAARMAX” Asset Allocation <i>Analysis - analyzes your positions, provides risk/return parameters and alternative allocations.</i>	\$450	
“Magic Number” Investment Projection - <i>Identifies monthly deposits needed to meet all future financial goals on an inflation-adjusted basis.</i>	\$175	
Business Planning Services	\$145/hr	