

## **Investment Advisor Disclosure 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 Advisor), 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 advisor provides investment supervisory 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 under the term "financial planning".

The Advisor charges fees for asset management and financial planning services. Fees are negotiated based on services desired and are sometimes quoted as a percentage of assets, a flat fee, a base rate plus a time increment, an hourly fee or as web site membership/subscription fee. The general 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. See attached base fee schedule, which is used as a guide in quoting and charging fees.

In general, planning services include gathering pertinent financial data, discussing and defining 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 plan & investment advisory service, future value projections, estate planning review and specific recommendations. Investment Advisory Services may also include specific recommendations regarding the purchase and sale of securities.

Generally a deposit (not to exceed \$475) will be payable to the applicant 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. The deposit for portfolio management will be applied to the first quarter's management fee.

Either the client or the applicant may cancel the service agreement by providing written notice to be received within five business days of signing. If the client or applicant cancels the agreement within this period, all monies 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 monies 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.

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

The advisor provides investment advice for investment companies on a negotiated basis. Fees are generally assessed monthly on the percentage of assets under management during the prior month. Specifically, the applicant is Manager of the six STAAR Investment Trust Funds, founded by the applicant.

The advisor offers advice regarding one or more of the following types of securities in its investment management program: exchange-listed securities (mostly stocks, bonds, exchange traded funds), over-the-counter securities, foreign issues (via ADRs or funds), corporate debt securities, US government and agency securities, options, certificates of deposit, municipal bonds, variable annuities, variable life insurance, mutual funds and partnerships (primarily oil and gas)

The applicant uses a broad variety of analysis methods and sources of information, including industry publications, research and reports and brokerage firm research. The applicant uses technical analysis to identify trends in markets and specific securities and utilizes fundamental analysis to verify trends or discover opportunities not apparent in trends.

The Advisor may employ long-term and short-term purchases, trading option writing depending on client objectives and portfolio restrictions. The Advisor may recommend to or purchase for clients securities in which the Advisor or a Related Person has some financial interest. The Advisor's staff or related personas may buy or sell for themselves securities recommended to clients.

The applicant uses a relatively 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.

General standards of education and experience for a solicitor or planner/advisor include a college degree and successful completion of the Series 65 Securities exam and one or more of the following: Certified Financial Planner (CFP), Chartered Financial Consultant (ChFC), Chartered Financial Analyst (CFA), Series 6 or 7 or equivalent educating and training. Such person(s) may also have passed licensing exams for life, health and accident insurance, except that an advisor employed solely for advice regarding securities does not need to have insurance-related credentials or experience. Such person(s) must also meet all requirements of the SEC and state regulations regarding financial planners and investment advisors. Additionally, such person(s) 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 CEO of the Advisor, J. Andre Weisbrod, was born in 1949, graduated with a Bachelor's Degree from Ohio University in 1971, attained the Chartered Financial Consultant (ChFC) designation in 1986 and has been President and CEO of SFA since 1993.

The Advisor company does not engage in business apart

## **STAAR<sup>SM</sup> Financial Advisors, Inc.**

from investment advice and financial planning. However, the President of the Adviser has other business activities outside the Adviser. He maintains a life, health and accident insurance license. Insurance activities are on an occasional basis. Other activities include acting, writing, music and development of some non-financial web sites. These are part-time and time invested varies, but averages a few hours per week.

The Advisor may have relationships with other advisors or qualified representatives who act as "solicitors" for the Advisor's services. Solicitors are compensated for referrals. That a solicitor is involved is disclosed in writing when the client signs an agreement for services.

The Advisor may use solicitors who are also insurance agents and/or registered representatives or other registered investment advisers. Such solicitors and the officers of the advisor 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 advisor 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 Advisor 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 Advisor has arrangements that are material to its advisory business or its clients with a related person who is an investment company, the STAAR Investment Trust. The Advisor is manager to the Trust. Some privately managed clients may utilize the Trust in their investment mix and receive reduction in fees to mitigate the effect of two layers of fees.

The Advisor or its officers or planners may from time to time recommend to clients securities that it or its employees or related persons own or buy or sell. This includes the STAAR Investment Trust Funds, which are managed by the Advisor. Any access person employed by the applicant is required to report such transactions to the applicant. The advisor has a policy that, in purchase or sale transactions, the client accounts will be traded first.

The Applicant has adopted along with its related person, the STAAR Investment Trust, a Code of Ethics. The guiding principle of the Code is that the Advisor and any personnel, related persons or board members "owe a fiduciary duty... to conduct their personal securities transactions in a manner that does not interfere with (Client) transactions or otherwise take unfair advantage of their relationship with the Advisor or the STAAR Investment Trust. Among the key elements of the code are General Prohibitions (including use of insider information, fraud, untrue statements or manipulation), Prohibited Transactions (including non-approved IPOs, pre-clearance and reporting of personal securities transactions, periodic certifications and reports by access persons), Confidentiality policies and Outside Business activities.

The Applicant generally imposes a minimum managed account size of \$100,000. This condition may be waived in certain circumstances, including client hardships or market downturns that might bring an account below the minimum.

The President, who is a Chartered Financial Consultant, reviews client accounts and plans. 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.

Investment Accounts are generally reviewed annually with the Client or more frequently upon client request. The Advisor recommends that financial plans be updated every five years or when client circumstances or objectives change significantly.

Clients receiving discretionary management services receive quarterly reports showing valuation, performance evaluation and asset allocation information. The Advisor recommends that Financial Plans be updated every five years or when client circumstances change significantly. Annual review meetings are encouraged. Clients also receive periodic letters and communications from Applicant.

When an account is under discretionary management, the Advisor has authority to determine without obtaining specific client consent, the securities to be bought or sold and the amount of securities to be bought and sold.

The Applicant or a related person may suggest brokers to a client, but the client is under no obligation to use them. Recommended brokers must provide the following: A competitive range of acceptable products, reasonable commissions and fees as well as service, research and other considerations advantageous to clients that are comparable to other broker-dealers providing such services. In general recommended broker-dealers will have competitive commission structures and fees, but the Advisor generally cannot determine commission rates paid. Any research received can be used to benefit all clients. Procedures for recommendations include disclosure of commissions, fees and services and communication that the client is under no obligation to use recommended brokers.

The Advisor does not have any agreements, oral or in writing, where it is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients.

The Applicant may utilize third party solicitors who refer clients to the Applicant. Such solicitors may be compensated with a percentage of the fees owned. Where a solicitor refers a client and receives compensation for referrals, a required disclosure will be provided to the client. The advisor may use solicitors for planning and investment advisory 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 Solicitor must disclose the fact that commissions will be received.

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 advice and 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.

Last Update February 2010

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

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## Fee Services & Discounts:

Service	Fee	Discounts When Combined with Other Services
Private Portfolio Management	See Table A Below	See Table B below
Hourly Consultation	\$145/hr The first hour's fee is required as a deposit at the time Agreement is signed.	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	\$475 A 50% deposit is required. With balance at delivery	Initial plan at no charge for Private Management Group, subsequent plan updates at 75% 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.	\$175 per year 100% due at the time Agreement is signed	40% discount for STAAR Investment Trust Shareholders with \$50,000 or greater account balance.
Membership to www.SFAMoney.com	Gold \$19.95/yr, Platinum \$175/yr	FREE to Managed, Planning, Hourly and STAARbase Clients

**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. Fees are accrued quarterly in arrears and based on the average of four month-end assets. A deposit of \$475 is required at the time the Agreement is signed.

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%

*Amounts over \$5,000,000 quoted separately.*

### Examples: Annualized Fees Charged Expressed as Ratio to Assets Managed

Account Size	\$100,000	\$250,000	\$500,000	\$1,000,000	\$5,000,000
STAAR Maximum Fee	1.38%	1.15%	0.95%	0.85%	0.57%

SFA discounts its Private Management Fees for clients using SIT:

**TABLE B: Management Fee Discount Schedule for Accounts using STAAR Investment Trust Funds.** (Effective November 1, 2005)

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%

*Note: These discounts are provided because SFA is the Advisor to the STAAR Funds and therefore receives a management fee to manage the Funds' investments. Therefore a client who hires SFA to manage allocation among the STAAR Funds will be paying a double fee, one to the Funds and one to SFA for the private management. To the extent a client chooses to use the STAAR Funds, the Advisor discounts the management fees to reduce the overall fees a client might pay.*

Web Site Subscription (Membership) Fees: SFA has created a web site, www.SFAMoney.com, for which fees are charged for certain services. There are two paid membership levels. The Gold level costs \$19.95 per year and provides immediate access to the STAAR Strategies Report as well as certain advanced planning tools. The Platinum level costs \$175 per year and provides access to model ETF and stock portfolios and commentary.