

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

OMB APPROVAL	
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Name of Investment Adviser: Staton Financial Advisors, LLC					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
2431 Hartmill Court, Charlotte NC 28226					(704) 365-2122

**This part of Form ADV gives information about the investment adviser and its business for the use of clients.
The information has not been approved or verified by any government authority.**

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(Schedules A, B, C, D, and E are included with Part I of this Form, for the use of regulatory bodies, and are not distributed to clients.)

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

Applicant: Staton Financial Advisors, LLC	SEC File Number: 801-62498	Date: 11/30/2009
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Definitions for Part II

Related person -- Any officer, director or partner of applicant or any person directly or indirectly controlling, controlled by, or under common control with the applicant, including any non-clerical, non-ministerial employee.

Investment Supervisory Services -- Giving continuous investment advice to a client (or making investments for the client) based on the individual needs of the client. Individual needs include, for example, the nature of other client assets and the client's personal and family obligations.

1. **A. Advisory Services and Fees.** (check the applicable boxes) For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:		
<input checked="" type="checkbox"/>	(1) Provides investment supervisory services	88%
<input type="checkbox"/>	(2) Manages investment advisory accounts not involving investment supervisory services	0%
<input type="checkbox"/>	(3) Furnishes investment advice through consultations not included in either services described above	0%
<input type="checkbox"/>	(4) Issues periodicals about securities by subscription	0%
<input type="checkbox"/>	(5) Issues special reports about securities not included in any service described above	0%
<input type="checkbox"/>	(6) Issues, not as part of any services described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities	0%
<input type="checkbox"/>	(7) On more than an occasional basis, furnishes advice to clients on matters not involving securities	0%
<input type="checkbox"/>	(8) Provides a timing service	0%
<input checked="" type="checkbox"/>	(9) Furnishes advice about securities in any manner not described above	12%

(Percentages should be based on applicant's last fiscal year. If applicant has not completed its first fiscal year, provide estimates of advisory billings for that year and state that the percentages are estimates.)

B. Does the applicant call any of the services it checked above financial planning or some similar term?

	Yes	No
	<input type="checkbox"/>	<input checked="" type="checkbox"/>

C. Applicant offers investment advisory services for: (check all that apply):

<input checked="" type="checkbox"/>	(1) A percentage of assets under management	<input checked="" type="checkbox"/>	(4) Subscription fees
<input type="checkbox"/>	(2) Hourly charges	<input type="checkbox"/>	(5) Commissions
<input type="checkbox"/>	(3) Fixed fees (not including subscription fees)	<input type="checkbox"/>	(6) Other

D. For each checked box in A above, describe on Schedule F:

- the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee
- applicant's basic fee **schedule**, how fees are charged and whether its fees are negotiable
- when compensation is payable, and if compensation is payable before service is provided, how a client may get a refund or may terminate an investment advisory contract before its expiration date

2. **Types of Clients** -- Applicant generally provides investment advice to: (check those that apply)

<input checked="" type="checkbox"/>	A. Individuals	<input checked="" type="checkbox"/>	E. Trusts, estates, or charitable organizations
<input type="checkbox"/>	B. Banks or thrift institutions	<input checked="" type="checkbox"/>	F. Corporations or business entities other than those listed above
<input type="checkbox"/>	C. Investment companies	<input type="checkbox"/>	G. Other (describe on Schedule F)
<input checked="" type="checkbox"/>	D. Pension and profit sharing plans		

3. Types of Investments. Applicant offers advice on the following: (check those that apply)

- | | |
|---|---|
| <p><input checked="" type="checkbox"/> A. Equity Securities
 (1) exchange-listed securities
 <input checked="" type="checkbox"/> (2) securities traded over-the-counter
 <input checked="" type="checkbox"/> (3) foreign issues</p> <p><input type="checkbox"/> B. Warrants</p> <p><input type="checkbox"/> C. Corporate debt securities
 (other than commercial paper)</p> <p><input checked="" type="checkbox"/> D. Commercial paper</p> <p><input checked="" type="checkbox"/> E. Certificates of deposit</p> <p><input checked="" type="checkbox"/> F. Municipal securities</p> <p><input type="checkbox"/> G. Investment company securities
 (1) variable life insurance
 <input type="checkbox"/> (2) variable annuities
 <input type="checkbox"/> (3) mutual fund shares</p> | <p><input type="checkbox"/> H. United States government securities</p> <p><input checked="" type="checkbox"/> I. Options contracts on:
 (1) securities
 <input type="checkbox"/> (2) commodities</p> <p><input type="checkbox"/> J. Futures contracts on:
 (1) tangibles
 <input type="checkbox"/> (2) intangibles</p> <p><input type="checkbox"/> K. Interests in partnerships investing in:
 (1) real estate
 <input type="checkbox"/> (2) oil and gas interests
 <input type="checkbox"/> (3) other (explain on Schedule F)</p> <p><input checked="" type="checkbox"/> L. Other (explain on Schedule F) Structured Products –
 Principal Protected Notes</p> |
|---|---|

4. Methods of Analysis, Sources of Information, and Investment Strategies.

A. Applicant's security analysis methods include: (check those that apply)

- | | |
|---|--|
| (1) <input type="checkbox"/> Charting | (4) <input checked="" type="checkbox"/> Cyclical |
| (2) <input checked="" type="checkbox"/> Fundamental | (5) <input type="checkbox"/> Other |
| (3) <input type="checkbox"/> Technical | |

B. The main sources of information applicant uses include: (check those that apply)

- | | |
|---|--|
| (1) <input checked="" type="checkbox"/> Financial newspapers and magazines | (5) <input type="checkbox"/> Timing services |
| (2) <input checked="" type="checkbox"/> Inspections of corporate activities | (6) <input checked="" type="checkbox"/> Annual reports, prospectuses, filings with the
Securities and Exchange Commission |
| (3) <input checked="" type="checkbox"/> Research materials prepared by others | (7) <input checked="" type="checkbox"/> Company press releases |
| (4) <input type="checkbox"/> Corporate rating services | (8) <input type="checkbox"/> Other (explain on Schedule F) |

C. The investment strategies used to implement any investment advice given to clients include: (check those that apply)

- | | |
|--|---|
| (1) <input checked="" type="checkbox"/> Long term purchases
(securities held at least a year) | (5) <input type="checkbox"/> Margin transactions |
| (2) <input checked="" type="checkbox"/> Short term purchases
(securities sold within a year) | (6) <input checked="" type="checkbox"/> Option writing, including covered options,
uncovered options or spreading strategies |
| (3) <input type="checkbox"/> Trading (securities sold within 30 days) | (7) <input type="checkbox"/> Other (explain on Schedule F) |
| (4) <input type="checkbox"/> Short sales | |

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5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No
 (If yes, describe these standards on Schedule F.)

6. Education and Business Background.

For:

- each member of the investment committee or group that determines general investment advice to be given to clients, or
- if the applicant has no investment committee or group, each individual who determines general investment advice given to clients (if more than five, respond only for their supervisors)
- each principal executive officer of applicant or each person with similar status or performing similar functions.

On Schedule F, give the:

- name Formal education after high school
- year of birth Business background for the preceding five years

7. Other Business Activities. (check those that apply)

- A. Applicant is actively engaged in a business other than giving investment advice.
- B. Applicant sells products or services other than investment advice to clients.
- C. The principal business of applicant or its principal executive officers involves something other than providing investment advice.

(For each checked box describe the other activities, including the time spent on them, on Schedule F.)

8. Other Financial Industry Activities or Affiliations. (check those that apply)

- A. Applicant is registered (or has an application pending) as a securities broker-dealer.
- B. Applicant is registered (or has an application pending) as a futures commission merchant, commodity pool operator or commodity trading adviser.
- C. Applicant has arrangements that are material to its advisory business or its clients with a related person who is a:
 - (1) broker-dealer (7) accounting firm
 - (2) investment company (8) law firm
 - (3) other investment adviser (9) insurance company or agency
 - (4) financial planning firm (10) pension consultant
 - (5) commodity pool operator, commodity trading adviser or futures commission merchant (11) real estate broker or dealer
 - (6) banking or thrift institution (12) entity that creates or packages limited partnerships

(For each checked box in C, on Schedule F identify the related person and describe the relationship and the arrangements.)

D. Is applicant or a related person a general partner in any partnership in which clients are solicited to invest? Yes No

(If yes, describe on Schedule F the partnerships and what they invest in.)

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Applicant:

Staton Financial Advisors, LLC

SEC File Number:

801-62498

Date:

11/30/2009

9. Participation or Interest in Client Transactions.

Applicant or a related person: (check those that apply)

- A. As principal, buys securities for itself from or sells securities it owns to any client.
- B. As broker or agent effects securities transactions for compensation for any client.
- C. As broker or agent for any person other than a client effects transactions in which client securities are sold to or bought from a brokerage customer.
- D. Recommends to clients that they buy or sell securities or investment products in which the applicant or a related person has some financial interest.
- E. Buys or sells for itself securities that it also recommends to clients.

(For each box checked, describe on Schedule F when the applicant or a related person engages in these transactions and what restrictions, internal procedures, or disclosures are used for conflicts of interest in those transactions.)

10. Conditions for Managing Accounts. Does the applicant provide investment supervisory services, manage investment advisory accounts or hold itself out as providing financial planning or some similarly termed services and impose a minimum dollar value of assets or other conditions for starting or maintaining an account?

Yes No

(If yes, describe on Schedule F.)

11. Review of Accounts. If applicant provides investment supervisory services, manages investment advisory accounts, or holds itself out as providing financial planning or some similarly termed services:

A. Describe below the reviews and reviewers of the accounts. For reviews, include their frequency, different levels, and Triggering factors. For reviewers, include the number of reviewers, their titles and functions, instructions they receive from applicant on performing reviews, and number of accounts assigned each.

All client portfolios are reviewed on a continuing and on-going basis by Bill Staton, Managing Member and Portfolio Manager. Factors that may trigger a review include, but are not limited to, a lifestyle change of the client, significant changes in market conditions, a change in fundamental valuation of a particular stock, and significant world events. Client portfolios are reviewed in December for tax purposes.

B. Describe the nature and frequency of regular reports to clients on their accounts.

Reports are provided to clients on a monthly basis from the custodian and upon client request. Such reports include portfolio positions and valuations, year-to-date gains and losses, and fee information.

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12. Investment or Brokerage Discretion.

- A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:
- | | | |
|--|---|--|
| (1) securities to be bought or sold? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (2) Amount of the securities to be bought or sold? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| (3) broker or dealer to be used? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (4) commission rates paid? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

- B. Does applicant or a related person suggest brokers to clients? Yes No

For each yes answer to A describe on Schedule F any limitations on the authority. For each yes to A(3), A(4), or B, describe on Schedule F the factors considered in selecting brokers and determining the reasonableness of their commissions. If the value of products, research and services given to the applicant or a related person is a factor, describe:

- the product, research and services
- whether clients may pay commissions higher than those obtainable from other brokers in return for those products and services
- whether research is used to service all of applicant's accounts or just those accounts paying for it; and
- any procedures the applicant used during the last fiscal year to direct client transactions to a particular broker in return for products and research services received.

13. Additional Compensation.

Does the applicant or a related person have any arrangements, oral or in writing, where it:

- A. 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? Yes No
- B. directly or indirectly compensates any person for client referrals? Yes No

(For each yes, describe the arrangements on Schedule F.)

14. Balance Sheet. Applicant must provide a balance sheet for the most recent fiscal year on Schedule G if applicant:

- has custody of client funds or securities; or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet? Yes No

Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).

Schedule F of Form ADV Continuation Sheet for Form ADV Part II	Applicant: Staton Financial Advisors, LLC	SEC File Number: 801-62498	Date: 11/30/2009
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(Do not use this Schedule as a continuation sheet for Form ADV Part I or any other schedules.)

1. Full name of applicant exactly as stated in item 1A of Part I of Form ADV: Staton Financial Advisors, LLC	IRS Empl. Ident. No.: 56-2214094
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Item of Form (identify)	Answer
ITEM 1.D	<p><u>ADVISORY SERVICES</u></p> <p>Staton Financial Advisors, LLC (the "Registrant") provides continuous and regular investment supervisory services to individuals, including high net worth individuals, pension and profit-sharing plans, trusts and small businesses (the "Clients") on a discretionary basis.</p> <p>The Registrant does not provide financial planning services. A Client's portfolio is managed by the Registrant in accordance with such Client's investment objectives, account restrictions, and any other information provided in writing by Client to Registrant. Registrant may not have a complete understanding of a Client's overall financial situation.</p> <p>Prior to engaging the Registrant to provide investment advisory services, the Client will be required to enter into a written agreement with the Registrant. The agreement shall be in effect until either party hereto gives written notice to the other party of its intention to terminate. The agreement may be terminated, without penalty, upon at least 30 days written notice by either party. Transactions in progress will be completed in the normal course of business. Upon termination, Client shall receive a pro-rata refund of that portion of any prepaid advisory fees that have yet to be earned by Registrant. Such refund will be calculated from the date of receipt of the written termination notice. Registrant does not generally place a minimum on asset size for investment advisory services; however, the Registrant reserves the right to impose a minimum threshold depending upon the Client's and/or Registrant's circumstances at the time.</p> <p><u>Advisory Fees</u></p> <p>Client will pay Registrant an annual fee (the "Fee") for its investment advisory services, which will be automatically deducted from the Client's account(s) by the Client Custodian unless otherwise arranged at the beginning of each quarter. The Fee will be calculated on the total value of all assets in Client's Account as of the last day of each calendar quarter, as reported by the Client's Custodian. The Fee is payable quarterly in advance. In any partial calendar quarter, the Fee will be pro-rated based upon the number of days that the Account was open during the quarter. Client understands that Account assets invested in shares of mutual funds or other investment companies ("funds") will be included in calculating the value of the Account for purposes of computing Registrant's Fees and the same assets will also be subject to additional advisory and other fees and expenses, as set forth in the prospectuses of those funds, paid by the funds, but ultimately borne by the investor. Subject to a minimum annual Fee of \$7,500, the amount of the annual Fee shall generally be 1.25% on all assets under management and may be negotiable for accounts with assets over \$4,000,000, billed quarterly at 0.3125%.</p> <p><u>General</u></p> <p>Management fees charged for discretionary management are generally negotiable. All fees paid to the Registrant for investment advisory services are separate from any fees and expenses charged by third-parties for brokerage and/or custodial services. Clients should review all relevant documentation provided by such parties in connection with entering into a custodial arrangements with such third parties.</p> <p>Registrant reserves the right to change its fee schedule, minimum fees, minimum accounts sizes and services, to negotiate fees, or to adjust its fees with respect to any client as it deems appropriate in the light of overall facts and circumstances (e.g., existing client relationship, anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, negotiations with client, etc.) pursuant to the terms of its investment advisory agreement.</p>

Additional Information

Established in 1986, Registrant's affiliate, The Staton Institute® Inc., is a financial education and counseling center that provides guidance on personal investing and finances through its various publications and newsletters. Depending upon the product or service being subscribed, specific fees are applicable. For the Registrant's current advisory Clients, fees are waived.

ITEM 3

TYPES OF INVESTMENTS

Registrant from time to time may evaluate certain investment opportunities, such as principal protected notes, offered by its Clients' designated brokers, who also act as the Clients' custodian. If such investment is suitable and meets the Clients' investment objectives, risk tolerance and cash availability, Registrant may, in its sole investment discretion, consider such investment for its Clients' portfolio.

ITEM 5

EDUCATION AND BUSINESS STANDARDS

Registrant requires its employees involved in determining or giving investment advice to clients to have a college degree or have equivalent business experience and achieve the CFA and/or CFP designations.

ITEM 6

EDUCATION AND BUSINESS BACKGROUND

William Gurley Staton, CFA

YOB: 1947

Formal Education after High School:

The Wharton School, MBA in Finance, 1971

University of North Carolina, Chapel Hill, BS in Business Administration, 1969

Business Background for the Preceding Five Years:

Staton Financial Advisors, LLC, Managing Director, 2000 to Present

The Staton Institute®, Inc., Chairman, 1986 to Present

Mary Tunstall Staton

YOB: 1950

Formal Education after High School:

University of Florida, BS in Journalism, 1972

McColl Graduate School of Business, Queens University, EMBA in Management, 1999

Business Background for the Preceding Five Years:

Staton Financial Advisors, LLC, Managing Director & Chief Compliance Officer, 2000 to Present

The Staton Institute®, Inc., CEO, 1986 to Present

Central Piedmont Community College, Director of Instructional Marketing , 2001-2003

ITEM 9.E

PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS

The Registrant may recommend to, or purchase and sell on behalf of, Clients the securities of an issuer in which it or any of its employees, officers, members or directors has a position or otherwise has a direct or indirect financial interest, including, but not limited to, owning securities of such issuer, providing consulting services to such issuer or serving as a director, or in a similar capacity, of such issuer.

To avoid any potential conflicts of interest involving personal trades, the Registrant has adopted a Code of Ethics, which includes Personal Trading and Insider Trading policies and procedures. Registrant's Code of Ethics requires, among other things, that employees, officers and members:

- Act with integrity, competence, diligence, respect, and in an ethical manner with the public, Clients, prospective clients and Employees;
- Place the integrity of the investment profession, the interests of Clients, and the interests of SFA above one's own personal interests;
- Adhere to the fundamental standard that you should not take inappropriate advantage of your position;
- Avoid any actual or potential material conflict of interest without first consulting with Senior Management;
- Conduct all personal securities transactions in a manner consistent with this policy;
- Use reasonable care and exercise independent professional judgment when conducting investment analysis, making investment recommendations, taking investment actions, and engaging in other professional activities;
- Practice and encourage others to practice in a professional and ethical manner that will reflect favorably on you and the profession;
- Promote the integrity of, and uphold the rules governing, capital markets;
- Maintain and improve your professional competence and strive to maintain and improve the competence of other investment professionals.
- Comply with applicable provisions of the Federal Securities Laws.

Registrant's Personal Trading policy and procedures also requires employees, officers and members to, among other things: 1) pre-clear certain personal securities transactions; 2) report personal securities transactions on at least a quarterly basis; 3) provide the Registrant with a detailed summary of certain holdings (both initially upon commencement of employment and annually thereafter) over which such employees and members have a direct or indirect beneficial interest; and 4) report any violations of the Code of Ethics to the Registrant.

To obtain more information about Registrant's Code of Ethics, please contact Registrant directly at (704) 365-2122.

ITEM 10

CONDITIONS FOR MANAGING ACCOUNTS

Registrant has established minimum fees of \$7,500 annually for managed accounts. This minimum fee is sometimes waived in the light of overall facts and circumstances.

ITEM 12A

INVESTMENT DISCRETION

Registrant's discretionary investment advisory agreement ("Agreement") authorizes it to determine, without obtaining specific client consent, the securities to be bought or sold, the amount to be bought or sold, the broker/dealer to be used if the client does not recommend one.

ITEM 12B

BROKERAGE ARRANGEMENTS

If a client does not have a broker, Registrant may suggest a broker where commissions and executions are competitive. These brokers may provide research services which benefit all of our clients in addition to offering competitive commissions and execution capabilities.

In the absence of contrary instructions from the client, engagement of the Registrant to manage assets in the custody of a broker will be treated by the Registrant as a direction by the client to execute all transactions through that broker. In such a directed brokerage arrangement, the Registrant is not free to seek best price and execution by placing transactions with other brokers or dealers. Accordingly, the client should consider whether the arrangement may result in disadvantages to the client that are not outweighed by the value of custodial, client reporting and other services provided by the broker.

Brokerage commission rates in the U.S. are not fixed by any authority, but are instead subject to negotiation. Clients that direct the Registrant to use a particular broker-dealer are responsible for negotiating commission rates and other terms and arrangements for their account. In a directed brokerage arrangement, the Registrant will not seek better execution services or prices from other

broker-dealers. As a result, the Registrant may not obtain best execution on behalf of the client, who may pay higher commissions, incur greater spreads or other transaction costs, or receive less favorable net prices on transactions for the account than would otherwise be the case if trades were executed with other broker-dealers who may or may not perform similar quality custodial, client reporting and/or other related services.

In instances where a Client is referred to the Registrant by a broker-dealer, the Registrant may be subject to an apparent or potential conflict between the Client's interest in obtaining best price and execution and the Registrant's interest in receiving future referrals from the broker-dealer. Moreover, even in instances where the Client has not been referred to the Registrant by a broker-dealer, the Registrant may be subject to a similar conflict in connection with its interest in receiving research from the broker-dealer and, where the broker-dealer also acts as custodian for the Client's account, in realizing certain operational efficiencies by having multiple Clients' assets held in custody by the same broker-dealer.

Registrant participates in various investment advisory service programs with various brokers, such as Raymond James, Wells Fargo Advisors and Schwab Institutional. While there is no direct linkage between the investment advice given by and Registrant's participation in the programs, economic benefits are received which would not be received if Registrant did not participate in the program. These benefits may include: receipt of duplicate Client confirmations and bundled duplicate statements; access to a trading desk serving program participants exclusively; ability to have investment advisory fees deducted directly from Client account; access to an electronic communication network for Client order entry and account information; receipt of compliance publications; portfolio accounting software; and participation in broker-sponsored conferences. Specifically, Schwab Institutional may discount or waive fees it would otherwise charge for some of these services. Registrant understands that the benefits received through its participation in these programs generally does not depend upon the amount of transactions directed to, or amount of assets custodied by the noted brokers.

ITEM 13B

ADDITIONAL COMPENSATION

Registrant no longer engages in contractual agreements with individuals who would solicit clients for the Registrant. In the event the Registrant in the future consider otherwise, the Registrant will comply with the requirements of Rule 206(4)-3 under the Investment Advisers Act of 1940.

MISCELLANEOUS

PROXY VOTING AND CLASS ACTION POLICIES

Notwithstanding Registrant's discretionary authority to make investment decisions on behalf of Client, Registrant will not exercise proxy voting authority over client securities. Client shall be instructed to inform its custodian that Registrant should not be designated as the party to receive information on voting client proxies. The obligation to vote Client proxies shall at all time rest with Client. Should Registrant inadvertently receive proxy information for a security held in Client's account, then Registrant will immediately forward such information on to Client, but will not take any further action with respect to the voting of such proxy. Upon termination of this Agreement, Registrant shall make a good faith and reasonable attempt to forward proxy information inadvertently received by Registrant on behalf of Client to the forwarding address provided by Client.

Additionally, the Registrant will not take any action or render any advice with respect to any securities held in the Account which are named in or subject to class action lawsuits. Registrant will, however, forward to Client any information received by the Registrant regarding class action legal matters involving any security in the Client's Account.

Clients desiring to obtain information about Registrant's Proxy Voting and Class Action Policies can contact Registrant directly at (704) 365-2122.

MISCELLANEOUS**PRIVACY NOTICE**

This notice is being provided to you in accordance with the Securities and Exchange Commission's rule regarding the privacy of consumer financial information ("Regulation S-P"). Please take the time to read and understand the privacy policies and procedures that we have implemented to safeguard your non-public personal information.

INFORMATION WE COLLECT

Staton Financial Advisors, LLC must collect certain personally identifiable financial information about its customers to provide financial services and products. The personally identifiable financial information that we gather during the normal course of doing business with you may include:

- information we receive from you on applications or other forms;
- information about your transactions with us, our affiliates, or others; and
- information we receive from a consumer reporting agency.

INFORMATION WE DISCLOSE

We do not disclose any non-public personal information about our customers or former customers to anyone, except as permitted or required by law, or as necessary to provide services to you. In accordance with Sections 248.13 through 248.15 of Regulation S-P, we may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as, but not limited to, attorneys, accountants, auditors and persons or entities that are assessing our compliance with industry standards. We enter into contractual agreements with all nonaffiliated third parties that prohibit such third parties from disclosing or using the information other than to carry out the purposes for which we disclose the information.

CONFIDENTIALITY AND SECURITY

We restrict access to non-public personal information about you to those employees who need to know that information to provide financial products or services to you. We maintain physical, electronic, and procedural safeguards that comply with federal standards to guard your nonpublic personal information.