

Uniform Application for Investment Adviser Registration

OMB APPROVAL	
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4.07	

Name of Investment Adviser: <b>KOEHLER FINANCIAL SERVICES, INC.</b>				
Address: (Number and Street)	(City)	(State)	(Zip Code)	Area Code Telephone Number
<b>5764 James Drive</b>	<b>Stevensville</b>	<b>MI</b>	<b>49127</b>	<b>(269 ) 429-0650</b>

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 governmental 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.

<b>1.</b>	<p><b>A. Advisory Services and Fees.</b> (check the applicable boxes)</p> <p style="text-align: right;">For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)</p> <p><b>Applicant:</b></p> <table style="width: 100%;"> <tr> <td style="width: 5%;"><input checked="" type="checkbox"/></td> <td style="width: 5%;">(1)</td> <td style="width: 75%;">Provides investment supervisory services . . . . .</td> <td style="width: 10%; text-align: right;"><b>95</b></td> <td style="width: 15%; text-align: right;">%</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(2)</td> <td>Manages investment advisory accounts not involving investment supervisory services . . . . .</td> <td></td> <td style="text-align: right;">%</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>(3)</td> <td>Furnishes investment advice through consultations not included in either service described above . . . . .</td> <td style="text-align: right;"><b>5</b></td> <td style="text-align: right;">%</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(4)</td> <td>Issues periodicals about securities by subscription . . . . .</td> <td></td> <td style="text-align: right;">%</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(5)</td> <td>Issues special reports about securities not included in any service described above . . . . .</td> <td></td> <td style="text-align: right;">%</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(6)</td> <td>Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . .</td> <td></td> <td style="text-align: right;">%</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(7)</td> <td>On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .</td> <td></td> <td style="text-align: right;">%</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(8)</td> <td>Provides a timing service . . . . .</td> <td></td> <td style="text-align: right;">%</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(9)</td> <td>Furnishes advice about securities in any manner not described above . . . . .</td> <td></td> <td style="text-align: right;">%</td> </tr> </table> <p style="text-align: center;">(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.)</p>	<input checked="" type="checkbox"/>	(1)	Provides investment supervisory services . . . . .	<b>95</b>	%	<input type="checkbox"/>	(2)	Manages investment advisory accounts not involving investment supervisory services . . . . .		%	<input checked="" type="checkbox"/>	(3)	Furnishes investment advice through consultations not included in either service described above . . . . .	<b>5</b>	%	<input type="checkbox"/>	(4)	Issues periodicals about securities by subscription . . . . .		%	<input type="checkbox"/>	(5)	Issues special reports about securities not included in any service described above . . . . .		%	<input type="checkbox"/>	(6)	Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities . . . . .		%	<input type="checkbox"/>	(7)	On more than an occasional basis, furnishes advice to clients on matters not involving securities . . . . .		%	<input type="checkbox"/>	(8)	Provides a timing service . . . . .		%	<input type="checkbox"/>	(9)	Furnishes advice about securities in any manner not described above . . . . .		%	
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	<p><b>B.</b> Does applicant call any of the services it checked above financial planning or some similar term? . . . . .</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>																																													
	<p><b>C.</b> Applicant offers investment advisory services for: (check all that apply)</p> <table style="width: 100%;"> <tr> <td style="width: 5%;"><input checked="" type="checkbox"/></td> <td style="width: 45%;">(1) A percentage of assets under management</td> <td style="width: 5%;"><input type="checkbox"/></td> <td style="width: 45%;">(4) Subscription fees</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(2) Hourly charges</td> <td><input checked="" type="checkbox"/></td> <td>(5) Commissions</td> </tr> <tr> <td><input type="checkbox"/></td> <td>(3) Fixed fees (not including subscription fees)</td> <td><input type="checkbox"/></td> <td>(6) Other</td> </tr> </table>		<input checked="" type="checkbox"/>	(1) A percentage of assets under management	<input type="checkbox"/>	(4) Subscription fees	<input type="checkbox"/>	(2) Hourly charges	<input checked="" type="checkbox"/>	(5) Commissions	<input type="checkbox"/>	(3) Fixed fees (not including subscription fees)	<input type="checkbox"/>	(6) Other																																	
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	<p><b>D.</b> For each checked box in A above, describe on Schedule F:</p> <ul style="list-style-type: none"> <li>● the services provided, including the name of any publication or report issued by the adviser on a subscription basis or for a fee</li> <li>● applicant's basic fee schedule, how fees are charged and whether its fees are negotiable</li> <li>● 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</li> </ul>																																														

  

<b>2.</b>	<p><b>Types of Clients</b> — Applicant generally provides investment advice to: (check those that apply)</p> <table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> A. Individuals  <input type="checkbox"/> B. Banks or thrift institutions  <input type="checkbox"/> C. Investment companies  <input checked="" type="checkbox"/> D. Pension and profit sharing plans </td> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations  <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above  <input type="checkbox"/> G. Other (describe on Schedule F) </td> </tr> </table>	<input checked="" type="checkbox"/> A. Individuals <input type="checkbox"/> B. Banks or thrift institutions <input type="checkbox"/> C. Investment companies <input checked="" type="checkbox"/> D. Pension and profit sharing plans	<input checked="" type="checkbox"/> E. Trusts, estates, or charitable organizations <input checked="" type="checkbox"/> F. Corporations or business entities other than those listed above <input type="checkbox"/> G. Other (describe on Schedule F)
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**Answer all items. Complete amended pages in full, circle amended items and file with execution page (page 1).**

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

☒
A.
Equity securities

☒
(1)
exchange-listed securities

☒
(2)
securities traded over-the-counter

☐
(3)
foreign issuers

☐
B.
Warrants

☒
C.
Corporate debt securities (other than commercial paper)

☒
D.
Commercial paper

☒
E.
Certificates of deposit

☒
F.
Municipal securities

G.
Investment company securities:

☒
(1)
variable life insurance

☒
(2)
variable annuities

☒
(3)
mutual fund shares

☒
H.
United States government securities

I.
Options contracts on:

☐
(1)
securities

☐
(2)
commodities

J.
Futures contracts on:

☐
(1)
tangibles

☐
(2)
intangibles

K.
Interests in partnerships investing in:

☐
(1)
real estate

☐
(2)
oil and gas interests

☐
(3)
other (explain on Schedule F)

☐
L.
Other (explain on Schedule F)

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

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

(1)
☒
Charting

(2)
☒
Fundamental

(3)
☒
Technical

(4)
☒
Cyclical

(5)
☐
Other (explain on Schedule F)

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

(1)
☒
Financial newspapers and magazines

(2)
☒
Inspections of corporate activities

(3)
☒
Research materials prepared by others

(4)
☒
Corporate rating services

(5)
☐
Timing services

(6)
☒
Annual reports, prospectuses, filings with the Securities and Exchange Commission

(7)
☐
Company press releases

(8)
☐
Other (explain on Schedule F)

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

(1)
☒
Long term purchases  
(securities held at least a year)

(2)
☒
Short term purchases  
(securities sold within a year)

(3)
☒
Trading (securities sold within 30 days)

(4)
☐
Short sales

(5)
☐
Margin transactions

(6)
☐
Option writing, including covered options, uncovered options, or spreading strategies

(7)
☐
Other (explain on Schedule F)

**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:
- |  |  |
|--|--|
| <input checked="" type="checkbox"/> (1) broker-dealer  | <input checked="" type="checkbox"/> (7) accounting firm                            |
| <input type="checkbox"/> (2) investment company  | <input type="checkbox"/> (8) law firm  |
| <input type="checkbox"/> (3) other investment adviser  | <input type="checkbox"/> (9) insurance company or agency                           |
| <input checked="" type="checkbox"/> (4) financial planning firm  | <input type="checkbox"/> (10) pension consultant                                   |
| <input type="checkbox"/> (5) commodity pool operator, commodity trading adviser or futures commission merchant | <input type="checkbox"/> (11) real estate broker or dealer                         |
| <input type="checkbox"/> (6) banking or thrift institution   | <input type="checkbox"/> (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.)

**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.)

Describe, on Schedule F, your code of ethics, and state that you will provide a copy of your code of ethics to any client or prospective client upon request.

- 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.

**Accounts are reviewed daily and we make quarterly tactical adjustments and they are re-allocated according to our criteria each year, or more frequently depending on the request of the client. They are updated by the applicant or its representatives based on pertinent information supplied by the client. Major changes in the client's situation or needs may call for an update prior to the scheduled annual review. All areas in the portfolio that would be affected by the change are reviewed and updated.**

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

**Quarterly Report, sharing customer balances at quarter end and year end reporting.**

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

**12. Investment or Brokerage Discretion.**

A. Does applicant or any related person have authority to determine, without obtaining specific client consent, the:

- |  |                                     |                                     |
|--|-------------------------------------|-------------------------------------|
|  | Yes                                 | No                                  |
| (1) securities to be bought or sold? .....               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (2) amount of the securities to be bought or sold? ..... | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| (3) broker or dealer to be used? .....                   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| (4) commission rates paid? .....                         | <input type="checkbox"/>            | <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 products, 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<br><input type="checkbox"/> <input checked="" type="checkbox"/> |
| B. directly or indirectly compensates any person for client referrals? .....  | Yes No<br><input type="checkbox"/> <input checked="" type="checkbox"/> |

(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 (unless applicant is registered or registering only with the Securities and Exchange Commission); 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<br><input type="checkbox"/> <input checked="" type="checkbox"/> |
|--|--|

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

(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: KOEHLER FINANCIAL SERVICES, INC.		IRS Empl. Ident. No.: 38-2636902
Item of Form (identify)	Answer	
1(A)	<p>PERSONAL INVESTMENT MANAGER PROGRAM</p> <p>The Company will provide discretionary investment advisory services geared primarily for individuals who wish to have their accounts managed.</p> <p>Individual clients will be asked to complete a confidential investor profile containing a variety of financial and personal data. Information requested includes investment goals, income requiremetns, time horizon and risk tolerance. Through an analysis of this data the Company develops an asset allocation for each client.</p> <p>One of the Company's employees will act as the account manager for each client. Investment allocation decisions as well as specific portfolio mutual fund selections will be reviewed on a continuous basis. The Company will not maintain custody of the individual shares owned by each client. Each client will be the registered owner of his or her shares held by a registered broker-dealer or the individual funds themselves.</p> <p>Before the opening of each client account the Company will provide the client with a current copy of its Form ADV Part II and the opportunity to impose reasonable restrictions on the management of the account. The Company will provide each client with a quarterly account statement and will notify the client in writing to contact the Company if (a) any changes have occurred in the client's financial situation or investment objectives that necessitate a change in either the asset allocation or specific funds held for that client or (b) if the client wishes to impose any reasonable restrictions on the management of the account. The Company will also provide the client annually with the opportunity to obtain an updated Form ADV Part II. The Client shall contact the Company if either (a) or (b) above has occurred.</p> <p>Koehler Financial Services, Inc. has designated the Chief Compliance Officer as Erica L. Momany and she can be reached at 269-429-0650, erica@koehlerfinancial.com or 5764 James Drive, Stevensville, MI 49127. Koehler Financial Services, Inc. has adopted a code of ethics, which can be obtained by contacing the Chief Compliance Officer as described in this paragraph.</p> <p>FEES</p> <p>Each client pays a fee based upon the market value in his or her account as of the end of each period. Management fees will be billed quarterly in arrears. Fees will be automatically deducted from each account for remittance to the Company unless other arrangements are made for direct remittance. All clients will be advised that the Company's fees are in addition to fees charged by each mutual fund. The Company will invest client funds primarily in no load mutual funds or mutual funds waiving any applicable sales loads, or offset any quarter annual management fees with commissions received from mutual fund or variable annuity providers. The Company may receive additional commissions for first year start up fees for which a portion shall not be offset against management fees.</p> <p>The current fee schedule is as follows:</p> <p>All accounts using mutual funds or variable annuities .25% per quarter</p> <p>All accounts using individual stocks .375% per quarter with a minimum fee of \$1,000.00 per quarter</p> <p>All fees are prorated for new or terminating accounts. Clients are provided with a fee disclosure statement at least seven (7) days prior to debit showing how the fees were calculated and giving the client the right to ask questions.</p>	

Applicant:  
**KOEHLER FINANCIAL SERVICES, INC.**

SEC File Number:  
801- 68578

Date: 02/11/2009

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV:  
**KOEHLER FINANCIAL SERVICES, INC.**

IRS Empl. Ident. No.:  
**38-2636902**

Item of Form (identify)	Answer
<b>4(A)(1,2,3,4)</b> <b>4(B)(1,2,3,4)</b>	The Company utilizes an array of mutual fund related research materials and databases. The Company subscribes to a number of statistical, ranking and other data sources and services (e.g. Lipper, Morningstar, Alexander Steele Mutual Fund Expert). The Company's primary information sources relate to mutual funds and specific market analysis.
<b>5</b>	<p>The Company requires that those individuals associated with determining or giving investment advice have a college education, CFP or equivalent and significant investment industry experience.</p> <p>Randy P. Koehler, President</p> <p>Erica L. Momany, Secretary</p>
<b>6</b>	<p>As President and founder of Koehler Financial Services, Inc. since 1985, Mr. Randy P. Koehler, age 53, brings over 25 years of experience in the investment field to the Company. He holds the position of registered principal of Koehler Financial, LLC, a FINRA registered broker dealer. Randy is also an associated person of Koehler Financial Services, Inc., a Michigan Registered Investment Advisor. Mr. Koehler is a Certified Financial Planner (CFP). In addition he holds FINRA Series 6, 26, and 63.</p> <p>As Secretary of Koehler Financial Services, Inc., Mrs. Erica L. Momany, age 31, brings over 13 years of experience in the investment field to the Company. She holds the position of Registered Securities Principal of Koehler Financial, LLC, a FINRA Registered broker dealer. Erica is also an associated person of Koehler Financial Services, Inc., a Michigan Registered Investment Advisor. Mrs. Momany holds FINRA Series 6, 26, and 63.</p>
<b>7(A)(B)</b>	<p>Koehler Financial Services, Inc.'s president, Randy P. Koehler is a graduate of the College for Financial Planning, University of Denver Daniels Business College, Denver, Colorado and a Certified Financial Planner, also a Registered Securities Principal of Koehler Financial, LLC, a FINRA Registered Broker Dealer, and provides financial planning services as a regular part of clients initial and ongoing servicing interviews.</p> <p>Koehler Financial Services, Inc.'s secretary Erica L. Momany is a graduate of Siena Heights University with a bachelor's of Business Administration, also a Registered Securities Principal of Koehler Financial, LLC., a FINRA Registered Broker Dealer, and provides financial planning services as a regular part of clients initial and ongoing servicing interviews.</p>
<b>8(C)(1,4)</b>	Koehler Financial Services, Inc. is the sole member of Koehler Financial, LLC., a FINRA Registered broker dealer, which markets mutual funds and variable contracts to clients where commissions are paid instead of fees. From time to time, third parties may reimburse Koehler Financial, LLC. for some educational and marketing expenses. Koehler Financial Services, Inc. operates under a dba Coastline Tax and Accounting providing tax preparation and tax planning services. Coastline Tax and Accounting also is an IRS direct electronic filer.

**PAGE 2**



(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: KOEHLER FINANCIAL SERVICES, INC.		IRS Empl. Ident. No.: 38-2636902
Item of Form (identify)	Answer	
8(C)(7,9)	Koehler Financial Services, Inc. operates a general agency life and property and casualty insurance business, which markets life and property and casualty insurance to clients as part of our financial planning process.	
9(B)	Randy P. Koehler and Erica L. Momany from time to time effects security transactions for clients as a registered representative/principal for Koehler Financial, LLC, a registered broker dealer, and transactions are fully disclosed to the client. The Company reviews the specific circumstances, current investments and investment goals of each client. In order to assure an appropriate fit with the Company's management style, the Company engages in a review each prospective client as to investment profile, value of asset, prior investment experience prior to admittance in an investment program.	
9(E)	From time to time Company employees buy and sell mutual funds and other securities for themselves that are also recommended to clients. All transactions for the same fund on the same day are effected at the single forward price established by the fund.	
12(A)	The Company maintains a limited power of attorney for each discretionary account. This limited authority allows the Company to determine the specific securities and the amount to be bought and sold but not to transfer any cash or securities out of the account. Selection of investments follows the general investment parameters selected for the client as well as any specific instructions associated with each client.	
12(B)	The Company does not directly suggest brokers to clients. In the absence of a selection by the client the Company will recommend that the client establish an account with TD Ameritrade, and a FINRA registered broker dealer and/or Koehler Financial, LLC., a FINRA registered broker dealer. Custody and clearing services for the account will be provided by National Investors Service Corporation, a division of TD Ameritrade or the issuing mutual fund or variable annuity provider.	

<b>Schedule G of Form ADV Balance Sheet</b>	Applicant: <b>KOEHLER FINANCIAL SERVICES, INC.</b>	SEC File Number: <b>801- 68578</b>	Date: <b>02/11/2009</b>
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(Answers in Response to Form ADV Part II Item 14.)

1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: <b>KOEHLER FINANCIAL SERVICES, INC.</b>	IRS Empl. Ident. No.: <b>38-2636902</b>
<b>Instructions</b>	
<p>1. The balance sheet must be:</p> <p>A. Prepared in accordance with generally accepted accounting principles</p> <p>B. Audited by an independent public accountant</p> <p>C. Accompanied by a note stating the principles used to prepare it, the basis of included securities, and any other explanations required for clarity.</p>	
2. Securities included at cost should show their market or fair value parenthetically.	
3. Qualifications and any accompanying independent accountant's report must conform to Article 2 of Regulation S-X (17 CFR 210.2-01 et seq.).	
<p>4. Sole proprietor investment advisers:</p> <p>A. Must show investment advisory business assets and liabilities separate from other business and personal assets and liabilities</p> <p>B. May aggregate other business and personal assets and liabilities unless there is an asset deficiency in the total financial position.</p>	

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