

**Schedule F of  
Form ADV**

**Continuation Sheet for Form ADV Part II**

Applicant:	SEC File Number:	Date:
Business Services Corporation <i>dba</i> Kahler Financial Group	801-62099	03/12/2009

(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: Business Services Corporation <i>dba</i> Kahler Financial Group	IRS Empl. Ident. No.: 46-0418959
Item of Form (identify)	Answer

Item 1D	<p>Business Services Corporation <i>dba</i> Kahler Financial Group ("<i>Kahler Financial Group</i>" or "<i>Adviser</i>"). Kahler Financial Group provides integrated financial planning services (financial planning, financial coaching) and investment advice to individuals, families, trusts, corporations and retirement plans.</p> <p>Kahler Financial Group is an independent financial advisory firm that does not sell investment products. Adviser does not receive compensation from third parties, such as a mutual fund or insurance company. Our advice is objective and there are no undisclosed conflicts of interest. We work solely for our clients. We charge a percentage of assets under management for clients not on a financial planning retainer; fixed-fees as a retainer, based on a combination of your net worth, manageable assets, and estimated services needed.</p> <p>Our mission statement is "<i>To empower our clients to discover and live the life of their dreams, by providing the confidence, peace of mind and assurance that their financial affairs are in order and their investments are protected and growing.</i>" Our commitment is to free you from the frustration of time-consuming, energy draining financial activities so you can discover and devote more time to things that are personally fulfilling.</p> <p>Our clients recognize that big goals happen by making small changes and they have a willingness to change behavior to further their long-term goals. They have realistic investment expectations and are able to ignore the investment 'du jour' as touted by the financial press. Most of our clients are affluent or becoming affluent and have the ability to save a portion of their income. Some have complex tax, investment, and other planning needs.</p> <p>We help clients make good money decisions by avoiding dangers, seizing opportunities, and maximizing their strengths. We offer specialization in our core area of competence and utilize other professionals when specialization is needed in other areas such as legal or accounting. Ongoing planning reviews, workshops, study groups, teleclasses, and special events help both new and existing clients feel part of the Kahler Financial Group community.</p> <p>The Adviser may offer an initial complimentary consultation to review the client's interests, needs and objectives, and to discuss the services available. Investment Advisory Services are initiated only after the client and Adviser execute an Engagement Agreement and/or a retainer agreement.</p> <p>This Sch. F discusses the Adviser's services, fees, and other important information.</p> <p><b>SERVICES</b></p> <p>Kahler Financial Group provides a percentage of assets under management for clients not on a financial planning agreement, and a fee integrated financial planning services and investment advice. You will never get a sales pitch, never experience churning of investments, and you will see more diversification with unbiased advice.</p>
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1D (continued)	<p><b>Kahler Financial Group's areas of special expertise includes the following:</b></p> <ul style="list-style-type: none"> <li>• Comprehensive financial plans for individuals and businesses</li> <li>• Creative and effective portfolio design</li> <li>• Investment portfolio management, including a broad selection of asset classes, market-neutral funds, non-leveraged commodity funds, and real estate investment trust funds.</li> <li>• Specialized problem-solving and analysis of complex financial issues such as asset protection, real estate consulting, and succession planning</li> <li>• Estate Planning Strategies</li> <li>• Tax Planning Strategies</li> <li>• Retirement planning, pension analysis, and retirement income projections</li> <li>• Education funding</li> <li>• Cash flow and budget analysis</li> <li>• Mortgage analysis and refinancing decisions</li> <li>• Business Planning, including succession planning and consultation regarding qualified and non-qualified employee benefit plans</li> <li>• Business and fractional interest valuations</li> </ul> <p><b>Dimensions of KFG's Integrated Financial Planning include:</b></p> <ul style="list-style-type: none"> <li>• Life aspiration planning</li> <li>• Conscious cash flow strategies</li> <li>• Legacy intention planning</li> <li>• Asset and income protection</li> <li>• Investment strategy planning</li> <li>• Financial maintenance and support</li> <li>• Building healthy money relationships</li> </ul> <p>We offer a wide variety of financial services supported by a four step process. KFG's Financial Planning is further described below:</p> <p><b>The Adviser's four step process includes:</b></p> <ul style="list-style-type: none"> <li>• DISCOVERY</li> <li>• DESIGN</li> <li>• IMPLEMENTATION</li> <li>• MAINTENANCE</li> </ul> <p>➤ <b>DISCOVERY</b></p> <p>Our Discovery process is uniquely designed by some of the most forward thinking planners in the nation to help you identify your values, goals, and priorities, and how they relate to money. The discovery session provides a review of your financial situation and concerns, as well as, what matters to you – your dreams, values, and commitments. It helps you bring into focus the life you want to be living, as opposed to the life you are living.</p>
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1D (continued)	<p>It begins a process of identifying financial and emotional road blocks that have kept you trapped. As a result of these meetings, our financial coach will help you develop an agenda and schedule for addressing each of your goals. An initial and data-gathering interview(s) are completed as part of the first phase of the Adviser's process in an effort to determine the client's stated individual needs, goals, objectives, time horizons, risk tolerance, in addition to any other information the client may provide. The Adviser will request input and information from the client, including; financial information including past financial history, present financial condition, and the investment goals. These may include planning for short-term goals (such as college funding) or for long-term goals (such as retirement planning) or other segments of an investment plan that may be desired. The information gathered for review and assessment may vary, depending upon the individual needs and objectives as stated by the client. Information presented by the client will be deemed reliable and current. The Adviser may also request the names and relationships of other Advisers (e.g., attorney, accountant, banker, etc.). The Adviser may also request information on the client's investment history and experience, family background, and anything else which may affect the client economically, based upon what information is reported by the client.</p> <p>Based upon the collected data and with the client's input, the Adviser will prepare recommendations and advice, as well as an investment policy statement or similar document, which may include a target asset allocation. The Adviser may consider various investment programs that may assist the client in meeting stated investment objectives. After the investment policy is agreed upon, Kahler Financial Group will prepare recommendations for investments or other segments of an investment plan that may be needed. The nature of services is tailored to the type of client and the professional services you require from Kahler Financial Group will be agreed upon at this time.</p> <p>➤ <b>DESIGN</b></p> <p>This part of the process is where we help you define the solutions that will enable you to achieve your goals. We will address the priorities that you have set and through a series of meetings we will conduct dialogue and education on solutions. We will identify the actions necessary to bring your goals into reality. The most common results from this process are to identify an appropriate cash flow plan, asset allocation, retirement planning, asset protection and risk management strategy, and estate and tax planning.</p> <p>Cash flow planning will address the issue of organizing and monitoring your cash flow. It will help you understand where your money is going and how to manage your spending. Asset allocation is a total review of your current investment portfolio and an analysis of its ability to help you achieve your authentic goals. The review will involve selecting asset classes, sub classes, and specific securities within those classes. We can provide ongoing management on a non-discretionary or discretionary basis. If we manage your portfolio, we will comply with the parameters and constraints established in an Investment Policy Statement that you design with the help of Kahler Financial Group.</p>
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(identify)

Answer

1D (Continued)

Retirement planning is a detailed look at the post-retirement cash flow projections that are a result of taking into account all potential sources of retirement income, company retirement plan options and the best strategies for maximizing assets to be used for retirement needs.

Asset Protection and Risk Management are a prudent part of the process designed to reduce risk to acceptable levels. This is a unique specialty service for Kahler Financial Group and will help protect you from catastrophe and frivolous lawsuits. This service will also include a review of all types of insurance coverage to ensure that you have the appropriate level of coverage.

Estate and Tax planning is designed to improve your wealth building efficiency and to help you transfer your lifetime assets according to your wishes. An appropriate estate plan can help you avoid probate and minimize your federal taxes. We provide assistance in working with your accountant and attorney in establishing your plan.

Financial coaching is designed to help you remove the financial and emotional road blocks that may be blocking your progress and to track and implement the goals and dreams you identified in the discovery process.

➤ **IMPLEMENTATION**

In the Implementation process we will assist and coordinate with all of your advisors. We will communicate with your accountant and your attorney (if you have directed us to do so) to implement your specific plan. We will monitor the progress and continue to address your goals with you. If we are providing asset management services we will review your current securities, select new securities and provide you with an Investment Policy Statement based on your individual asset allocation goals. This service provides an asset allocation recommendation based on the principle of diversification among various categories. Asset class diversification can provide increased stability of principal. We choose assets for your portfolio based on your needs. Our choices are affected by economic conditions, your liquidity needs, proposed investment period, need for diversification and importance of current income. In addition, we take into consideration your risk tolerance, your present and anticipated tax situation as well as the investment's historical yield, potential appreciation and marketability. The focus is on long term planning; however, the investment strategies used to implement any investment advice given to you will include both long term and short term purchases.

We recommend and manage many types of assets, including exchange-listed securities, mutual fund shares, corporate debt, US government securities, real estate, variable annuities and certificates of deposits. The process we use in making investment choices includes looking at markets and industries using charting, fundamental, technical, and cyclical analysis. Our information is gathered from a variety of sources, including research organizations, professional publications, mutual fund and corporate rating services, prospectuses, financial newspapers and magazines, timing services, and annual reports.

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1D (Continued)	<p>If you choose to have us manage your portfolio on a non-discretionary basis, that means all trades are reliant on a written confirmation from you. That written confirmation is usually obtained prior to the trade, but may be obtained after a trade was completed with a verbal approval.</p> <p>If you choose to have us manage your portfolio on a discretionary basis, we will discretionarily execute all trades in accordance and compliance with your Investment Policy Statement. Discretionary asset management services are designed for clients who prefer to leave the decisions regarding the selection of specific investment vehicles to Kahler Financial Group. This service is similar in all aspects to our nondiscretionary services, with the exception that we choose the investments for your portfolio that are in compliance with the Investment Policy Statement and execute the trades discretionarily.</p> <p>➤ <b>MAINTENANCE</b></p> <p>The maintenance process will include the on-going oversight of your goal implementation. Some services like asset protection, retirement planning, estate planning, financial coaching or tax planning are ongoing or completed over a longer period of time. We hold periodic meetings with a minimum of an annual meeting. The number of meetings per year depends upon your complexity. More complex client needs will indicate more frequent meetings. In our meetings we will focus on the following areas: a complete investment review, a review of your goals, a retirement planning review, and a general Financial Checkup. A Financial Checkup is a general review of all the aspects of your financial future, with the focus on how they inter-relate. It is designed to give you an overview, to help you make decisions about your priorities and the resources needed to achieve your goals. A Financial Checkup is generally provided on an annual basis for retainer clients.</p> <p><b>PORTFOLIO REVIEW</b></p> <p>Richard S. Kahler is the President and Chief Compliance Officer of Kahler Financial Group and the Portfolio Analyst with strategic oversight of all clients' portfolios, and managerial oversight of Kahler Financial Group's Investment Department. He is responsible for the review of client portfolios. The portfolio review process that he uses is as follows:</p> <p>Client portfolios are assigned a minimum of a quarterly review with more frequent reviews as needed. This review is not necessarily based on the timing of meetings with clients. This review is done on an aggregate client basis and does not require timing decisions.</p> <p>Underlying investments of portfolios are reviewed frequently (at least quarterly, sometimes monthly or daily). The client portfolios are generally reviewed on a quarterly basis, however reviews could also occur at the time of significant new deposits or withdrawals, material changes in client's financial information, significant changes in the market, as often as the client may prefer as agreed to at engagement, or at the Adviser's discretion. Reviews entail analyzing client portfolios, securities, sensitivity to overall markets, economic changes, investment results and asset</p>
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1D (Continued)	<p>allocation, etc., to help ensure the investment strategy is structured to continue to meet clients' stated needs and objectives.</p> <p>When a client's portfolio is reviewed, we first look at each individual holding to see if any significant changes have occurred. We give particular attention to mutual funds that the client holds by researching the performance, risk, style or current operational data of each fund. We then compare the current allocation among the asset classes to the allocation in their target portfolio and Investment Policy Statement.</p> <p>If we determine that adjustments need to be made to bring the portfolio into closer conformity with the target allocation, we research all the assets in the categories in question to determine what changes to make. We then develop the trades needed to make these adjustments.</p> <p>Clients receive periodic reports in which the allocation of the portfolio among asset classes is compared with the target allocation. The portfolio's return is compared to appropriate benchmarks and an income statement is provided when appropriate. Reports on individual assets are sent to clients on an irregular basis, as the advisor deems appropriate. Reports showing realized gains/losses and income received are sent to clients within the first three months after year-end.</p> <p><i>Clients are obligated to contact the Adviser promptly if there has been a change in the client's financial situation as new information may warrant a review or change in the investment strategies.</i> Clients may call the office at any time during normal business hours to discuss the client's account, financial situation or investment needs directly with Richard S. Kahler, CFP, MS, CPA/PFS, CFP®, the President and Chief Compliance Officer. The Adviser requests client contact no less than annually. Each year, the Adviser will request current financial status information from the client to determine if there have been any changes to the client's financial situation.</p> <p>Clients will have a direct and beneficial interest in his/her securities, rather than an undivided interest in a pool of securities.</p> <p>Kahler Financial Group may have limited discretionary authority to execute trades if such authority is granted by clients. Alternatively, clients are welcome to implement investment recommendations and advice, in whole or in part, through the financial service provider of their choice. The clients of Kahler Financial Group retain the authority to proxy vote and will continue to do so until we otherwise may agree in writing. Clients should ensure that proxy ballots are mailed directly to them by selecting this option on their custodial application forms. Clients are welcome to delegate said proxy voting authority to a properly authorized agent (non-advisory personnel). Kahler Financial Group will not take action with respect to any securities or other investments that become the subject of any legal proceedings, including bankruptcies.</p>
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1D (Continued)	<p><b>Asset Management Services (for clients not on a financial planning retainer)</b></p> <p>KFG will assess your goals, objectives, time horizon and risk tolerance and recommend a portfolio that fits your needs. We believe good asset allocation will consist of a variety of appropriately selected asset classes. Our experience is that the majority of portfolio returns are the result of the asset allocation decision and not market-timing or individual security selection. We spend the majority of our time in determining the percentage allocation among nine asset classes: US Stocks, Foreign Stocks, US Bonds, TIPS, High Yield Bonds, Foreign Bonds, Cash, REITS, Natural Resource, and Absolute Return. The percentage allocations are designed with each individual client's goals and risk tolerance in mind. Our services include the following:</p> <ul style="list-style-type: none"> <li>• Designing and implementing an appropriate asset allocation plan</li> <li>• Identifying specific assets and investment managers within each asset category.</li> <li>• Developing a written Investment Policy Statement</li> <li>• Monitoring the performance of all selected assets.</li> <li>• Recommending changes to the client's investment policy statement</li> <li>• Re-balancing the portfolio when appropriate</li> <li>• Being available to meet with the client periodically</li> <li>• Tax loss harvesting</li> <li>• Preparing and presenting appropriate reports.</li> </ul> <p><b>Fees</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="3">Managed Asset Range</th><th>%</th></tr> </thead> <tbody> <tr> <td>\$ -</td><td>to</td><td>\$ 500,000</td><td>1.50</td></tr> <tr> <td>\$ 500,001</td><td>to</td><td>\$10,000,000</td><td>0.40</td></tr> <tr> <td>\$ 10,000,001</td><td>to</td><td>\$20,000,000</td><td>0.30</td></tr> <tr> <td>\$20,000,001</td><td>to</td><td>\$50,000,000</td><td>0.25</td></tr> </tbody> </table> <p>Fees are subject to a minimum of \$1,250 per quarter or \$5,000 annually. (The minimum fee is lowered for clients' immediate family members.)</p> <p>A one-time data gathering fee, equal to a quarterly fee, and the first quarterly fee are due at the beginning of the engagement. Thereafter asset management fees are due quarterly in arrears. Asset management fees are established annually based on the assets under management as of October 31<sup>st</sup> of each year. Other services not listed above will be billed on an hourly basis of \$350 per hour.</p>	Managed Asset Range			%	\$ -	to	\$ 500,000	1.50	\$ 500,001	to	\$10,000,000	0.40	\$ 10,000,001	to	\$20,000,000	0.30	\$20,000,001	to	\$50,000,000	0.25
Managed Asset Range			%																		
\$ -	to	\$ 500,000	1.50																		
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1D (Continued)	<p>The asset management fee schedule is calculated based on a percentage of total assets that Kahler Financial Group manages on a client's behalf. As a result, there exists a potential conflict of interest regarding advice given by KFG since KFG's revenues are directly impacted by the size of a client's portfolio. While KFG pledges that their clients' best interests are their highest priority, KFG feels compelled to disclose that charging fees based on a percent of assets under management poses a potential conflict of interest.</p> <p>For clients who had executed engagement agreements with KFG prior to October 1, 2008, the flat fee will be the lesser of the fee schedule above or the fee paid in their previous quarter plus an annual adjustment of not less than the estimated Consumer Price Index (CPI) increase for the previous year.</p> <p><b>Integrated Financial Planning</b></p> <p>This service reviews, evaluates, and integrates eight areas of financial planning into your life, namely, investment strategies, financial independence planning, tax strategies, estate planning, insurance protection, asset protection, cash flow management, and financial coaching.</p> <p>These services include all the asset management services listed above with the addition of the following:</p> <p><u>Initial Planning Process</u></p> <ul style="list-style-type: none"> <li>• Identify and prioritize client's short-term and long-term life aspirations</li> <li>• Gather and organize client's financial data and documents</li> <li>• Review retirement planning, asset protection strategies, estate planning, tax strategies, and cash flow.</li> <li>• Implement asset management services</li> <li>• Identify life transitions that client is and expects to be experiencing</li> <li>• Identify problematic behaviors that may be sabotaging client's financial sobriety</li> <li>• Analyze client's financial condition</li> <li>• Develop strategies that balance client's goals and life aspirations</li> <li>• Help implement all financial decisions</li> </ul> <p><u>Ongoing Financial Planning</u></p> <ul style="list-style-type: none"> <li>• Review and revise financial planning decisions</li> <li>• Meet regularly with client to review goals and life aspirations</li> <li>• Asset management services</li> <li>• Monitor life transitions</li> <li>• Strategize and coordinate with other advisors (accountants, attorneys, counselors, etc.)</li> </ul>
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**Fees**

Client's fee is a flat quarterly retainer based on the flowing schedule:

<b>Net Worth</b>	<b>Quarterly</b>	<b>Annual</b>
Under \$750,000	\$2,500	\$7,500

- For each \$125,000 of net worth, from \$750,000 to \$1,000,000, the fee will be an additional \$313 per quarter or \$1,250 annually.
- For each \$250,000 of net worth, from \$1,000,000 to \$10,000,000, the fee will be an additional \$313 per quarter or \$1,250 annually.
- For each additional \$500,000 of net worth over \$10,000,000, the fee will be \$375 per quarter or \$1,500 annually.

These fees are based on the net worth at the time of the engagement and may be adjusted at the end of each year. This quarterly retainer is cancelable any time without restriction.

A one-time data gathering fee, equal to the first quarterly fee, and the first quarterly fee are due at the beginning of the engagement. Thereafter asset management fees are due quarterly in arrears.

Net Worth excludes personal property and primary and secondary residences.

For clients who had executed engagement agreements with KFG prior to October 1, 2008, the flat fee will be the lesser of the fee schedule above or the fee paid in their previous quarter plus an annual adjustment of not less than the estimated Consumer Price Index (CPI) increase for the previous year.

Kahler Financial Group also provides **Financial Planning Services** offered for an hourly or project basis on a *limited* basis (infrequently through the year as the schedule may permit). The Adviser can provide advice on certain financial planning components or design a comprehensive written financial plan.

The Adviser's hourly rate for Consultation and Financial Planning Services is \$350. A project fee may be quoted based upon the time and effort required. The total fee and services to be provided are agreed upon at the time of engagement. Project fees will vary based upon the time to be incurred by the Adviser in addition to the nature and complexity of services. Financial Planning Services are ongoing. Personal financial coaching or counseling fees, in addition to those included in a planning retainer, are available at an additional \$150 per hour. The fee for group financial counseling is \$70 per week with a twenty-six week minimum engagement.

The Adviser may request a retainer to schedule services or fees will be due upon delivery of services. Where a retainer is requested, the retainer will be no more than 1/2 the proposed project fee. The balance of the fee is payable upon the delivery of services.

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Item 3K(3)&L	<p><b><u>Other Investments</u></b></p> <p>Kahler Financial Group may provide consultation services relating to clients' interests in investment in real estate and business ventures, but the Adviser will not manage these investments unless agreed in writing.</p> <p>Kahler Financial Group may provide advice on any other product which addresses the stated individualized needs, goals, and objectives of the client.</p>
Item 4A,B&C	<p><b><u>Methods of Analysis, Sources of Information, and Investment Strategies</u></b></p> <p>Kahler Financial Group reviews an investor's goals, time horizon, and risk tolerance through an interview process in an effort to determine a plan/portfolio that will best suit the investor's needs. Consultations and a written questionnaire are often utilized for the purpose of data-gathering. The client's information is used to determine what investment recommendations are appropriate. The Adviser will rely on the information provided by the client and is not obligated to verify the accuracy of information or reports provided.</p> <p>Investment strategies may be based upon a number of concepts and determined by the type of investor. Portfolios, advice and recommendations are based upon a client's stated goals, objectives, investment time horizon and risk tolerance using the information the client provides. Advice may include specific or overall investment information as determined by the client or the Adviser.</p>

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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: Business Services Corporation <i>dba</i> Kahler Financial Group	IRS Empl. Ident. No.: 46-0418959
Item of Form (identify)	Answer

Item 4A,B&C (Continued)	<p>Investment strategies used to implement investment advice are generally long-term in nature and primarily utilize a "buy and hold" philosophy. Investment strategies may include short-term purchases depending upon the individual needs and objectives of the client. All proposed investment strategies are closely evaluated, in advance, to insure they are in keeping with the client's stated/written investment policy or directives.</p> <p>The concept of asset allocation, or spreading investments among a number of asset classes (domestic stocks vs. foreign stocks; large cap stocks vs. small cap stocks; corporate bonds vs. government securities) is generally in the forefront of our strategies.</p> <p>At its heart, asset allocation seeks to achieve the most efficient diversification of assets, so as to help lessen risk while not sacrificing the effectiveness of the portfolio in an effort to yield the client's stated objectives. Since Kahler Financial Group believes that risk reduction is a key element to long-term investment success, asset allocation principles are a key part of the Firm's overall approach in preparing advice for clients.</p> <p>Kahler Financial Group is obligated, as a fiduciary, to provide the best possible execution of securities transactions for clients under the circumstances of the particular transaction. The Adviser must execute individual securities transactions for clients in such a manner that the clients' total costs or proceeds in each transaction are the most favorable under the circumstances. Typically, in order to achieve best execution of individual securities transactions, an Investment Adviser may bunch or block client orders when available. In light of the individualized services provided to clients, and the fact that most orders involve mutual funds, bunching orders is generally not undertaken or not available.</p> <p>The Adviser feels that fees associated with services are competitive compared to other investment advisory firms offering similar services. Clients may pay higher or lower commissions and transaction fees to custodial service providers they may select.</p> <p>The Adviser's preferred service providers are noted at Item 12.B of this Schedule. Kahler Financial Group considers the full range and quality of a broker's services in placing brokerage accounts, including, but not limited to the value or research provided as well as execution capability, commission rate, the ability to negotiate commissions, the ability to obtain volume discounts, financial responsibility, and responsiveness to the Adviser. The determinative factor is not the lowest commission cost but whether the transaction represents the best qualitative execution for the managed account. Therefore, Kahler Financial Group periodically and systematically reviews and evaluates the execution performance of the broker/dealer handling our transactions. In evaluating whether a broker or dealer will provide "best execution," historical net prices (after commissions or other transaction-related compensation) on other transactions will be a principal factor, but other, related factors will also be relevant, including the execution, clearance and settlement capabilities of the broker or dealer generally and in connection with securities of the type to be bought or sold;</p>
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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:	SEC File Number:	Date:
Business Services Corporation dba Kahler Financial Group	801-62099	03/12/2009

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: Business Services Corporation dba Kahler Financial Group	IRS Empl. Ident. No.: 46-0418959
Item of Form (identify)	Answer

Item 4A,B&C (Continued)	<p>the broker's or dealer's willingness to commit capital; its reliability and financial stability; the size of the transaction; and the market for the security.</p> <p>Where services are limited in scope, such as they may be during Consultation Services, Kahler Financial Group's advice, recommendations and services may be limited by the amount of time given for the project and the information provided by the client.</p> <p>Kahler Financial Group utilizes many resources of public information to include financial news and research materials. The Adviser also utilizes a number of computer databases available to professional Investment Advisers by subscription. These databases are reviewed on a regular basis. Additionally, unaffiliated service providers may occasionally be engaged to provide statistical reports, tax alerts and investment reviews to the Adviser on a regular basis.</p> <p>When special situations arise, the Adviser may also consult with outside experts for additional input (without sharing nonpublic personally identifying client data). Examples of these outside, unaffiliated consultants include, but are not limited to: Attorneys, investment managers, accountants, or pension specialists. Any fees associated with these consultations would be born solely by the Adviser unless other arrangements have been made, under a separate engagement letter or agreement between the client and the outside service provider.</p> <p>Kahler Financial Group holds no insurance licenses. When reviewing insurance products for clients, we will rely on information given to us by your insurance agent. From time to time, we will request (with your permission and direction) analysis, quotes, and recommendations from licensed insurance agents and brokers whom we trust or have done business with in the past. We receive no compensation, directly or indirectly from any insurance product you may purchase from any insurance agent or broker.</p>
Item 5	<p><b><u>Educational and Business Standards</u></b></p> <p>The Advisory Representatives of Kahler Financial Group will have at least three years of significant experience in providing financial management and planning. Ideal candidates will also have attained or are working towards a Masters Degree in personal finance and the Certified Financial Planner designation.</p>
Item 6	<p><b><u>Educational and Business Background (Officers)</u></b></p> <p><b>Richard S. Kahler, CFP®, MS, President and Chief Compliance Officer YOB 1955</b></p> <p>Rick Kahler, MS, CFP®, ChFC, CCIM, and president of Kahler Financial Group (<a href="http://www.KahlerFinancial.com">www.KahlerFinancial.com</a>), is a life-long resident of Rapid City, South Dakota. He founded Kahler Financial Group in 1981 as the first fee-only financial planner in South Dakota. In 2008, he was recognized by <i>Wealth Manager</i> magazine as the largest financial planning firm in a six-state region. His firm specializes in the</p>

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Item 6 (Continued)	<p>integration of financial coaching, counseling, and traditional financial planning.</p> <p>He has served on and chaired the South Dakota Investment Council (managing \$6 billion) and has served nationally in several leadership capacities with the Financial Planning Association. Kahler is also a nationally renowned speaker and educator. His workshops and seminars draw some of the world's wealthiest and most influential people.</p> <p>He is co-author of four revolutionary books on money: <i>Conscious Finance: Uncover Your Hidden Money Beliefs and Transform the Role of Money in Your Life</i> (FoxCraft, Inc., second edition 2007), <i>The Financial Wisdom of Ebenezer Scrooge: 5 Principles to Transform Your Relationship with Money</i> (HCI, 2006), <i>Facilitating Financial Health</i> (NUCO, 2008), and <i>Wired For Wealth</i> (HCI 2009).</p> <p>He is on the faculty at Golden Gate University where he teaches their Psychology of Money graduate course. In 2008 the Journal of Financial Planning named his research paper as a winner of the annual Frontiers Award.</p> <p>His work, as the co-founder of <a href="#">Onsite's</a> Healing Money Issues workshop, was featured in Wynonna Judd's book <a href="#">Coming Home To Myself</a>, (New American Library, 2005). <a href="#">The Wall Street Journal</a> hailed this work as "an innovative effort that combines experiential therapy with nuts-and-bolts financial planning."</p> <p>He has been published or cited in <i>The Wall Street Journal</i>, <i>New York Times</i>, <i>USA Today</i>, <i>The Washington Post</i>, <i>Money</i>, <i>BusinessWeek</i>, <i>NBC's Today Show</i>, <i>ABC's Good Morning America Show</i>, <i>MSNMoney.com</i>, and the <i>Journal of Financial Planning</i>.</p> <p><b><u>EDUCATION:</u></b></p> <p>1983 - CFP® (Certified Financial Planner) 1992 - BA Applied Science National American University, Rapid City, SD 1999 - MS Wealth Management, College of Financial Planning, Denver, CO</p> <p><b><u>LICENSES, REGISTRATIONS AND BUSINESS BACKGROUND:</u></b></p> <p>-Business Services Corp., Inc. dba Kahler Financial Group: Registered Investment Advisor, South Dakota, since 1983 and Registered with the SEC since 2003</p> <p>-State Certified General Appraiser, South Dakota, since 1992</p> <p>-Certified Commercial Investment Member (CCIM), since 1980</p> <p>-South Dakota Real Estate Broker, since 1974</p>
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Item 7A,B	<p><b><u>Other Business Activities and Material Affiliations</u></b></p> <p>Business Services Corp., Inc. <i>dba</i> Kahler Financial Group is solely engaged in the delivery of investment advisory services and is owned by First American Trust, a private trust.</p> <p>Separate and distinct from the investment advisory practice, Richard S. Kahler, CFP®, MS, the President and Chief Compliance Officer of the Adviser, is the President and 50% owner of Caldwell Commercial Real Estate, Inc. <i>dba</i> Kahler Property Management. Mr. Kahler is also the President and 50% owner of Kahler, Inc. <i>dba</i> Prudential Kahler Realtors, but there is no time spent on this activity during market hours. Mr. Kahler holds a real estate brokerage license and is a state certified general appraiser. While the time spent on these outside business activities may vary throughout the year, it may account for approximately 15% of his time on commercial appraisal and 1% of his time in commercial real estate. Clients are welcome, but are never obligated, to utilize the services available through these outside businesses. Any non-advisory services will be provided through a separate agreement with the appropriate entity. Where appraisal and realtor services are utilized, Richard Kahler will earn normal fees and realtor commissions for services. While fees to FFS, Inc. from appraisal services are substantial, income from real estate commissions has been negligible for the past 5 years since Mr. Kahler retired from active real estate sales. Also, FFS, Inc. does not normally provide appraisal services to clients of Kahler Financial Group because of the potential for a conflict of interest.</p>
Item 9E	<p><b><u>Participation of Interest in Client Transactions</u></b></p> <p>At times, the investment interests of the Advisory Representatives or related persons may coincide with the interest of clients' accounts. Due to the relatively insignificant investments, made by the members or related persons of the Adviser, in relation to total market investments, these transactions would have no noticeable affect on market prices or movement. However, at no time will the Adviser, Representatives, or any related person receive an added benefit or advantage over clients with respect to these transactions as a result of their position. The interests and needs of clients are at the forefront of the Adviser's practice. All rules and regulations of the United States Securities and Exchange Commission's ("SEC") Investment Advisers Act of 1940, will be strictly enforced. The Adviser will not permit insider trading and has established the required internal policy relating to insider trading. Richard S. Kahler, CFP®, MS, the Chief Compliance Officer of Kahler Financial Group monitors its staff's personal securities holdings records.</p> <p>In 2005, Investment Advisers were required to implement a written Code of Ethics. Kahler Financial Group's Code of Ethics are as follows:</p> <p><b><u>FIDUCIARY RESPONSIBILITIES:</u></b> Kahler Financial Group is a fiduciary to each and every client. The SEC takes the position that Investment Advisers owe their clients several specific duties as fiduciaries and these include: Advice that is suitable; Full disclosure of material facts and potential conflicts of interest (such that the client has complete and honest disclosure in order to make an informed decision about</p>

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Item of Form (identify)	Answer

Item 9E (Continued)	<p>services of the Adviser and about investment recommendations); Utmost and exclusive loyalty and good faith; Best execution of transactions; The Adviser's reasonable care to avoid ever misleading clients; Only acting in the best interests of clients. It is Kahler Financial Group's policy to protect the interests of each of the Adviser's clients and to place the clients' interests first and foremost in each and every situation. Further, Kahler Financial Group monitors the personal trading of all access persons, defined as staff members who have access to client, trading and investment recommendations prepared by the Adviser.</p> <p>The Adviser's staff shall always act in good faith and with candor; The Adviser shall be proactive in my disclosure of any conflicts of interest that may impact you; and the Adviser shall not accept any referral fees or compensation that is contingent upon the purchase or sale of a financial product.</p> <p><b><u>INTERNAL CODE OF ETHICS:</u></b> Kahler Financial Group takes the issue of regulatory compliance seriously. The Adviser and its staff are required to comply with state and applicable federal securities regulations. Kahler Financial Group requires that all staff members (advisory representatives and associated persons) immediately report any known or suspected violations of the Adviser's Fiduciary Duties, Code of Ethics or securities rules and regulations to the Adviser's Chief Compliance Officer, Richard S. Kahler, CFP®, MS. Failure to report material information will result in loss of authority or termination and possible additional action by a regulator. Kahler Financial Group will abide by honest and ethical business practices to include, but are not limited to:</p> <ul style="list-style-type: none"><li>▪ We will not induce trading in a client's account that is excessive in size or frequency in view of the financial resources and character of the account;</li><li>▪ We will make investment decisions with reasonable grounds to believe that the decisions are suitable for the client on the basis of information furnished by the customer and we will document suitability;</li><li>▪ We will place discretionary orders only after obtaining clients' authorization as evidenced by our retainer and the broker/dealers' trading authorization;</li><li>▪ We are never to borrow money or securities from, or lend money or securities to a client;</li><li>▪ We will not place an order for the purchase or sale of a security if the security is not registered, or the security or transaction is not exempt from registration in states where we provide investment advice;</li><li>▪ We will not place orders, or recommend that the client place an order to purchase or sell a security through a broker/dealer or agent, or engage the services of a broker/dealer, agent of, advisory representative or advisory firm that is not licensed in states where</li></ul>
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Item 9E	<p>we provide investment advice, or with the SEC;</p> <ul style="list-style-type: none"> <li>All access persons will report all but exempt personal securities trading to the Chief Compliance Officer for themselves and for beneficial relationships. The Chief Compliance Officer is charged with approval and monitoring of personal securities transactions.</li> </ul> <p><b>CFP® CODE:</b> Richard S. Kahler, CFP®, MS holds the Certified Financial Planner™ designation ("CFP®"). The Certified Financial Planner Board of Standards Inc. (CFP Board) also has adopted its own Code of Ethics and Professional Responsibility (<i>Code of Ethics</i>) to provide principles and rules to all persons whom it has recognized and certified to use the CFP, Certified Financial Planner™ and certification marks (collectively "<i>the marks</i>"). The CFP Board determines who is certified and thus authorized to use the marks. Implicit in the acceptance of this authorization is an obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.® The CFP® <i>Code of Ethics</i>' Principles express the profession's recognition of its responsibilities to the public, to clients, to colleagues and to employers. They apply to all CFP Board designees and provide guidance to them in the performance of their professional services. Clients are welcome to request a copy of the CFP® Code of Ethics from the Advisor.</p> <p>If clients should have any questions relating to the Adviser's Code of Ethics or would like copies of the above Codes, they can contact Richard S. Kahler, CFP®, MS, and the Chief Compliance Officer of Kahler Financial Group.</p>
Item 10	<p><b><u>Minimum Service Conditions</u></b></p> <p>Kahler Financial Group requires a minimum annual fee of \$7500 for investment only clients, and \$10000 for full financial planning clients. New clients pay an initial data-gathering fee which is equal to the first quarterly retainer fee. The fee for group financial counseling is \$70 per week with a twenty-six week minimum engagement.</p> <p>The Adviser reserves the right to decline services to any person or firm, in its sole discretion. The Adviser may waive the minimum fee where special circumstances exist, for pre-existing relationships, for friends or family members.</p>
Item 12A(1,2)	<p><b><u>Limited Discretionary Authority</u></b></p> <p>Kahler Financial Group may maintain limited discretion to execute trades as evidenced by the Engagement Agreement. Kahler Financial Group does not have authority to withdraw funds (except for advisory fees, if authorized) or securities and will not take custody of the same. Clients retain the authority to vote proxies and are responsible for ensuring that all proxy materials are sent directly to them.</p>

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Item 12B	<p><b><u>Brokerage Recommendations</u></b></p> <p>Kahler Financial Group participates in the institutional customer program offered by TD AMERITRADE INSTITUTIONAL. TD AMERITRADE INSTITUTIONAL is a division of TD AMERITRADE Inc., member FINRA/SIPC ("TD Ameritrade"), an unaffiliated SEC-registered broker/dealer and FINRA member. TD Ameritrade offers to independent investment advisors services which include custody of securities, trade execution, clearance and settlement of transactions. Kahler Financial Group receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under Item 13.A. below.)</p> <p>Kahler also utilizes Fixed Income Securities for bond transactions. As noted in Item 1D under fees, if clients elect to use any other service providers, the Adviser charges an additional .25% annually.</p> <p>Clients are welcome to select the service provider of their choice. However, as disclosed in the Engagement Agreement, in these cases the Adviser cannot guarantee best execution of transactions due to limitations of services or because of limitations placed on the Adviser by the service provider. Additionally, these clients will be responsible to ensure that Kahler Financial Group has the authority to receive all account information in a timely manner. All directed brokerage requests are to be received in writing.</p> <p>Kahler Financial Group recognizes its duty to provide best execution in providing advice and recommendations for all its clients in consideration of the circumstances available. The decision to recommend the services of the preferred broker/dealer is based upon the customer service provided to investors and the services available to the Adviser.</p> <p>While it is possible that clients may pay higher commission or transaction fees through the preferred service provider, Kahler Financial Group has determined that the preferred company currently offers the best overall value to Kahler Financial Group and its clients for the brokerage and technology it provides.</p> <p>Kahler Financial Group periodically reviews other alternatives that are available to the Adviser market. Attention will be given to transaction costs, quality of services, and cost of services. As part of this review, we will solicit information from comparable brokerage firms. These must be firms with a separate division to serve investment advisors, which provide an equivalent level of service to advisors and their clients as do the firms with which our company is currently doing business. Comparison of the three aspects listed above will be made. However, Kahler Financial Group believes that excellent customer service and trade execution is superior to most non-service oriented, deep-discount and internet- brokers that may otherwise be available to the public. TD Ameritrade features a broad line of products and services that are available to every investor.</p> <p>We will not make any changes in our current practices if the differences in costs and services between the current brokerage providers and others are minor. We</p>
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Item 12B (Continued)	<p>recognize the reluctance of clients to change brokerage firms, and believe it is not in their best interest to do so for small differences. However, if we determine that any of the brokerage firms with which we are dealing are significantly higher in cost to clients, or provide a significantly lower level of services, we will contact those of our clients who have accounts with the firm in question to determine if they prefer to stay with that firm or to move to a better firm that we have identified. Those who wish to move their accounts will be given the appropriate paperwork to do so, once Kahler Financial Group has established a relationship with the new brokerage firm.</p> <p>TD Ameritrade can provide Kahler Financial Group with access to its institutional trading and operations services, which are typically not available to retail investors. Services received include research, brokerage, custody, access to mutual funds and other investments that are otherwise available only to institutional investors or would require a significantly higher minimum initial investment.</p>
Item 13A	<p><b><u>Other Considerations Received</u></b></p> <p>As disclosed under Item 12B. above, Kahler Financial Group participates in TD AMERITRADE's INSTITUTIONAL customer program and Kahler Financial Group may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Kahler Financial Group's participation in the program and the investment advice it gives to its clients, although Kahler Financial Group receives economic benefits through its participation in the program that are typically not available to TD Ameritrade retail investors. These benefits include the following products and services (provided without cost or at a discount): duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving advisor participants; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain INSTITUTIONAL money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Kahler Financial Group by third party vendors. TD Ameritrade may also have paid for business consulting and professional services received by Kahler Financial Group's related persons and may also pay or reimburse expenses (including travel, lodging, meals and entertainment expenses) for Kahler Financial Group's personnel to attend conferences or meetings relating to the program or to TD Ameritrade's advisor custody and brokerage services generally. Some of the products and services made available by TD Ameritrade through the program may benefit Kahler Financial Group but may not benefit its client accounts. These products or services may assist Kahler Financial Group in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Kahler Financial Group manage and further develop its business enterprise. The benefits received by Kahler Financial Group through participation in the program do not depend on the amount of brokerage transactions directed to TD Ameritrade. Clients should be aware, however, that the receipt of economic benefits</p>

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Item 13A (Continued)	<p>by Kahler Financial Group or its related persons in and of itself creates a potential conflict of interest and may indirectly influence Kahler Financial Group's recommendation of TD Ameritrade for custody and brokerage services. Kahler Financial Group also receives from TD Ameritrade certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in the program. TD Ameritrade provides the Additional Services in its sole discretion and at its own expense, and Kahler Financial Group does not pay any fees to TD Ameritrade for the Additional Services. Kahler Financial Group and TD Ameritrade have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services. Kahler Financial Group's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Kahler Financial Group, TD Ameritrade most likely considers the amount and profitability to TD Ameritrade of the assets in, and trades placed for, Kahler Financial Group's client accounts maintained with TD Ameritrade. TD Ameritrade has the right to terminate the Additional Services Addendum with Kahler Financial Group, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD Ameritrade, Kahler Financial Group may have an incentive to recommend to its clients that the assets under management by Kahler Financial Group be held in custody with TD Ameritrade and to place transactions for client accounts with TD Ameritrade. Kahler Financial Group's receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.</p> <p>Kahler Financial Group also receives from TD AMERITRADE certain additional economic benefits ("Additional Services") that may or may not be offered to any other independent investment advisors participating in the program. Specifically, the Additional Services include \$2,500 per year for Morningstar. TD AMERITRADE provides the Additional Services to Registrant in its sole discretion and at its own expense, and Registrant does not pay any fees to TD AMERITRADE for the Additional Services. Registrant and TD AMERITRADE have entered into a separate agreement ("Additional Services Addendum") to govern the terms of the provision of the Additional Services.</p> <p>Registrant's receipt of Additional Services raises potential conflicts of interest. In providing Additional Services to Registrant, TD AMERITRADE most likely considers the amount and profitability to TD AMERITRADE of the assets in, and trades placed for, Registrant's client accounts maintained with TD AMERITRADE. TD AMERITRADE has the right to terminate the Additional Services Addendum with Registrant, in its sole discretion, provided certain conditions are met. Consequently, in order to continue to obtain the Additional Services from TD AMERITRADE, Registrant may have an incentive to recommend to its clients that the assets under management by Registrant be held in custody with TD AMERITRADE and to place transactions for client accounts with TD AMERITRADE. Registrant's receipt of Additional Services does not diminish its duty to act in the best interests of its clients, including to seek best execution of trades for client accounts.</p>
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Item 13A (Continued)	Kahler Financial Group provides <i>fee-only</i> investment advisory services and Advisory Representatives are not Registered Representatives of any other broker/dealer firm. Kahler Financial Group takes the position that any of these customary business considerations received from service providers are incidental and do not, in any way, impair the Adviser's independence.
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