



GAHLER FINANCIAL

Gahler Financial, LLC

Form ADV Part 2A – Disclosure Brochure

Effective: January 25, 2023

This Form ADV Part 2A (“Disclosure Brochure”) provides information about the qualifications and business practices of Gahler Financial, LLC (“Gahler Financial” or the “Advisor”). If you have any questions about the contents of this Disclosure Brochure, please contact us at (512) 981-6372.

Gahler Financial is a registered investment advisor located in the State of Texas. The information in this Disclosure Brochure has not been approved or verified by the U.S. Securities and Exchange Commission (“SEC”) or by any state securities authority. Registration of an investment advisor does not imply any specific level of skill or training. This Disclosure Brochure provides information about Gahler Financial to assist you in determining whether to retain the Advisor.

Additional information about Gahler Financial and its advisory persons are available on the SEC’s website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD# 292785.

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Item 2 – Material Changes

Form ADV 2 is divided into two parts: Part 2A (the "Disclosure Brochure") and Part 2B (the "Brochure Supplement"). The Disclosure Brochure provides information about a variety of topics relating to an Advisor's business practices and conflicts of interest. The Brochure Supplement provides information about advisory personnel of Gahler Financial. For convenience, we have combined these documents into a single disclosure document.

Gahler Financial believes that communication and transparency are the foundation of its relationship with Clients and will continually strive to provide its Clients with complete and accurate information at all times. Gahler Financial encourages all current and prospective Clients to read this Disclosure Brochure and discuss any questions you may have with us. And of course, we always welcome your feedback.

Material Changes

The material changes in this brochure from the last annual updating amendment of Gahler Financial on January 19, 2022, are described below. Material changes relate to Gahler Financial's policies, practices or conflicts of interests.

- Gahler Financial updated its minimum account size to \$500K. (Item 7)
- Mr. Gahler no longer hold his insurance license. (Items 5 & 10)
- Gahler Financial updated Item 4 to disclose held away accounts via integration with Pontera.
- Gahler Financial has updated its financial planning fees and now accepts AdvicePay as a method of payment. (Item 5)
- Gahler Financial also recommends Fidelity Brokerage Services LLC as a custodian. (Item 12)

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs.

At any time, you may view the current Disclosure Brochure on-line at the SEC's Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching for our firm name or by our CRD# 292785. You may also request a copy of this Disclosure Brochure at any time, by contacting us at (512) 981-6372.

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Item 4 – Advisory Services

A. Firm Information

Gahler Financial, LLC (“Gahler Financial” or the “Advisor”) is a registered investment advisor located in the State of Texas, which is organized as a Limited Liability Company (LLC) under the laws of the State of Texas. Gahler Financial was founded in May 2013 and is owned and operated by Kasey Gahler (President & Chief Compliance Officer). This Disclosure Brochure provides information regarding the qualifications, business practices, and the advisory services provided by Gahler Financial.

B. Advisory Services Offered

Gahler Financial offers investment advisory services to individuals and high net worth individuals (each referred to as a “Client”) in the State of Texas and other states.

Financial Planning Services

Gahler Financial will typically provide a variety of financial planning and consulting services to Clients, pursuant to a written financial planning agreement. Services are offered in several areas of a Client’s financial situation, depending on their goals, objectives and financial situation.

Generally, such financial planning services involve preparing a formal financial plan or rendering a specific financial consultation based on the Client’s financial goals and objectives. This planning or consulting may encompass one or more areas of need, including but not limited to, investment planning, retirement planning, personal savings, education savings and other areas of a Client’s financial situation.

A financial plan developed for, or financial consultation rendered to the Client will usually include general recommendations for a course of activity or specific actions to be taken by the Client. For example, recommendations may be made that the Client start or revise their investment programs, commence or alter retirement savings, establish education savings and/or charitable giving programs.

Gahler Financial may also refer Clients to an accountant, attorney or other specialists, as appropriate for their unique situation. For certain financial planning engagements, the Advisor will provide a written summary of the Client’s financial situation, observations, and recommendations. For consulting or ad-hoc engagements, the Advisor may not provide a written summary. Plans or consultations are typically completed within six months of contract date, assuming all information and documents requested are provided promptly.

Financial planning and consulting recommendations may pose a conflict between the interests of the Advisor and the interests of the Client. For example, a recommendation to engage the Advisor for investment management services or to increase the level of investment assets with the Advisor would pose a conflict, as it would increase the advisory fees paid to the Advisor. Clients are not obligated to implement any recommendations made by the Advisor or maintain an ongoing relationship with the Advisor. If the Client elects to act on any of the recommendations made by the Advisor, the Client is under no obligation to affect the transaction through the Advisor.

Investment Management Services

Gahler Financial provides customized investment advisory solutions for its Clients. This is achieved through continuous personal Client contact and interaction while providing discretionary investment management and related advisory services. Gahler Financial works closely with each Client to identify their investment goals and objectives as well as risk tolerance and financial situation in order to create a portfolio strategy. Gahler Financial will then construct a portfolio, consisting of low-cost, diversified mutual funds and/or exchange-traded funds (“ETFs”) to achieve the Client’s investment goals. The Advisor may also utilize individual stocks, bonds or options contracts to meet the needs of its Clients. The Advisor may retain certain types of investments based on a Client’s legacy portfolio construction.

Gahler Financial's investment strategy is primarily long-term focused, but the Advisor may buy, sell or re-allocate positions that have been held less than one year to meet the objectives of the Client or due to market conditions. Gahler Financial will construct, implement and monitor the portfolio to ensure it meets the goals, objectives, circumstances, and risk tolerance agreed to by the Client. Each Client will have the opportunity to place reasonable restrictions on the types of investments to be held in their respective portfolio, subject to acceptance by the Advisor.

Gahler Financial evaluates and selects investments for inclusion in Client portfolios only after applying its internal due diligence process. Gahler Financial may recommend, on occasion, redistributing investment allocations to diversify the portfolio. Gahler Financial may recommend specific positions to increase sector or asset class weightings. The Advisor may recommend employing cash positions as a possible hedge against market movement. Gahler Financial may recommend selling positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position[s] in the portfolio, change in risk tolerance of Client, generating cash to meet Client needs, or any risk deemed unacceptable for the Client's risk tolerance.

At no time will Gahler Financial accept or maintain custody of a Client's funds or securities, except for authorized deduction of the Advisor's fees. All Client assets will be managed within their designated brokerage account or pension account, pursuant to the Client investment advisory agreement. Please see "Item 12 – Brokerage Practices".

Held Away Accounts – Pontera

We use a third party platform to facilitate management of held away assets such as defined contribution plan participant accounts, with discretion. The platform allows us to avoid being considered to have custody of Client funds since we do not have direct access to Client log-in credentials to affect trades. We are not affiliated with the platform in any way and receive no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Once Client account(s) is connected to the platform, Adviser will review the current account allocations. When deemed necessary, Adviser will rebalance the account considering client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends. The goal is to improve account performance over time, minimize loss during difficult markets, and manage internal fees that harm account performance. Client account(s) will be reviewed at least quarterly and allocation changes will be made as deemed necessary.

Pension Consulting Services

Gahler Financial offers consulting services to pension or other employee benefit plans (including but not limited to 401(k) plans). Pension consulting may include, but is not limited to:

- identifying investment objectives and restrictions
- providing guidance on various assets classes and investment options
- recommending money managers to manage plan assets in ways designed to achieve objectives
- monitoring performance of money managers and investment options and making recommendations for changes
- recommending other service providers, such as custodians, administrators and broker-dealers
- creating a written pension consulting plan

These services are based on the goals, objectives, demographics, time horizon, and/or risk tolerance of the plan and its participants.

C. Client Account Management

Prior to engaging Gahler Financial to provide investment advisory services, each Client is required to enter into one or more agreements with the Advisor that define the terms, conditions, authority and responsibilities of the Advisor and the Client. These services may include:

- Establishing an Investment Strategy – Gahler Financial, in connection with the Client, may develop a strategy that seeks to achieve the Client’s goals and destinations. The strategy is designed to address the Client’s personal goals, investment goals, and both long-term and short-term objectives.
- Asset Allocation – Gahler Financial will develop a strategic asset allocation that is targeted to meet the investment objectives, time horizon, financial situation and tolerance of risk for each Client.
- Portfolio Construction – Gahler Financial will develop a portfolio for the Client that is intended to meet the stated goals and objectives of the Client.
- Investment Management and Supervision – Gahler Financial will provide investment management and ongoing oversight of the Client’s investment portfolio.

D. Written Acknowledgement of Fiduciary Status

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours. Under this special rule’s provisions, we must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put our financial interests ahead of yours when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that we give advice that is in your best interest;
- Charge no more than is reasonable for our services; and
- Give you basic information about conflicts of interest.

E. Wrap Fee Programs

Gahler Financial does not manage or place Client assets into a wrap fee program. Investment management services are provided directly by Gahler Financial.

F. Assets Under Management

As of December 31, 2022, Gahler Financial manages \$ 63,634,403.00 for our clients. Assets under management shall be updated on an annual basis following fiscal year end, December 31. Clients may request more current information at any time by contacting the Advisor.

Item 5 – Fees and Compensation

The following paragraphs detail the fee structure and compensation methodology for services provided by the Advisor. Each Client engaging the Advisor for services described herein shall be required to enter into a written agreement with the Advisor.

A. Fees for Advisory Services

Financial Planning Services

Gahler Financial offers financial planning services for a fixed fee engagement fee ranging from \$2,000 to \$5,000. Fees may be negotiable based on the nature and complexity of the services to be provided and the overall relationship with the Advisor. An estimate for total costs will be determined prior to establishing the advisory relationship.

Investment Management Services

Investment advisory fees are paid quarterly in advance via direct deduction from the client account, pursuant to the terms of the investment advisory agreement. Investment advisory fees are based on the market value of assets under management at the end of the prior calendar quarter. Investment advisory fees are based on the following schedule:

Assets Under Management (\$)	Annual Rate (%)
\$0 to \$1,000,000	1.00%
\$1,000,001 to \$2,000,000	0.85%
\$2,000,001 to and over	0.70%

The investment advisory fee in the first quarter of service is prorated from the inception date of the account[s] to the end of the first quarter. Fees may be negotiable at the discretion of the Advisor. The Client's fees will take into consideration the aggregate assets under management with Advisor. All securities held in accounts managed by Gahler Financial will be independently valued by the designated Custodian. Gahler Financial will not have the authority or responsibility to value portfolio securities.

The Advisor's fee is exclusive of, and in addition to, brokerage fees, transaction fees, and other related costs and expenses, which may be incurred by the Client. However, the Advisor shall not receive any portion of these commissions, fees, and costs.

Pension Consulting Services Fees

The rate for pension consulting services is 1.25% of the plan assets for which Gahler Financial is providing such consulting services. These fees are negotiable.

B. Fee Billing

Financial Planning Services

Financial planning fees are invoiced by the Advisor and are due upon execution of the financial planning agreement. Financial planning fees are paid via check or AdvicePay.

Investment Management Services

Investment advisory fees are calculated by the Advisor or its delegate and deducted from the Client's account[s] by the Custodian. The Advisor shall send an invoice to the Custodian indicating the amount of the fees to be deducted from the Client's account[s] at the beginning of the respective quarter. The investment advisory fee is then forwarded to the Advisor or deposited into an account designated by the Advisor. The amount due is calculated by applying the quarterly rate (the annual rate divided by total days in the future quarter) to the total assets under management with Gahler Financial at the end of the prior quarter. Clients will be provided with a statement, at least quarterly, from the Custodian reflecting deduction of the investment advisory fee. In addition, the Advisor will provide the Client a report itemizing the fee, including the calculation period covered by the fee, the account value and the methodology used to calculate the fee. It is the responsibility of the Client to verify the accuracy of these fees as listed on the Custodian's brokerage statement as the Custodian does not assume this responsibility. Clients provide written authorization permitting Gahler Financial to be paid directly from their account[s] held by the Custodian as part of the investment advisory agreement and separate account forms provided by the Custodian.

Pension Consulting Services Fees

Pension consulting fees are withdrawn directly from the client's accounts with client's written authorization

Fees are paid quarterly in arrears. The amount due is calculated by applying the quarterly rate (annual rate divided by 4) to the total assets under management with Gahler Financial at either the end of the prior quarter or the average daily rate of assets, depending on the plan provider.

C. Other Fees and Expenses

Clients may incur certain fees or charges imposed by third parties, other than Gahler Financial, in connection with investments made on behalf of the Client's account[s]. The Client is responsible for all custodial and securities execution fees charged by the Custodian and executing broker-dealer. The fees charged by Gahler Financial are separate and distinct from these custodial and execution fees.

In addition, all fees paid to Gahler Financial for investment advisory services are separate and distinct from the expenses charged by mutual funds and exchange-traded funds to their shareholders, if applicable. These fees and expenses are described in each fund's prospectus. These fees and expenses will generally be used to pay management fees for the funds, other fund expenses, account administration (e.g., custody, brokerage and account reporting), and a possible distribution fee. A Client could invest in these products directly, without the services of Gahler Financial, but would not receive the services provided by Gahler Financial which are designed, among other things, to assist the Client in determining which products or services are most appropriate for each Client's financial situation and objectives. Accordingly, the Client should review both the fees charged by the fund[s] and the fees charged by Gahler Financial to fully understand the total fees to be paid. Please refer to Item 12 – Brokerage Practices for additional information.

D. Advance Payment of Fees and Termination

Financial Planning Services

Gahler Financial is compensated for its services as described above. Either party may terminate the financial planning agreement by providing advance written notice to the other party. The Client may terminate the financial planning agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. Upon termination, the Client shall be billed for the percentage of the engagement scope completed by the Advisor. The Advisor will refund any unearned, prepaid planning fees from the effective date of termination. The Client's financial planning agreement with the Advisor is non-transferable without the Client's prior approval.

Investment Management Services

Gahler Financial is compensated for its services in advance of the quarter in which investment advisory services are rendered. Either party may terminate the investment advisory agreement, at any time, by providing advance written notice to the other party. The Client may terminate the investment advisory agreement within five (5) business days of signing the Advisor's agreement at no cost to the Client. After the five-day period, the Client will incur charges for bona fide advisory services rendered to the point of termination and such fees will be due and payable by the Client. The Advisor will refund any unearned, prepaid investment advisory fees from the effective

date of termination to the end of the quarter. The Client's investment advisory agreement with the Advisor is non-transferable without the Client's prior approval.

E. Compensation for Sales of Securities

Gahler Financial does not buy or sell securities and does not receive any compensation for securities transactions in any Client account, other than the investment advisory fees noted above.

Item 6 – Performance-Based Fees and Side-By-Side Management

Gahler Financial does not charge performance-based fees for its investment advisory services. The fees charged by Gahler Financial are as described in "Item 5 – Fees and Compensation" above and are not

based upon the capital appreciation of the funds or securities held by any Client.

Gahler Financial does not manage any proprietary investment funds or limited partnerships (for example, a mutual fund or a hedge fund) and has no financial incentive to recommend any particular investment options to its Clients.

Item 7 – Types of Clients

Gahler Financial offers investment advisory services to individuals and high net worth individuals in the State of Texas and other states. The number of each type of Client is available on Gahler Financial's Form ADV Part 1A. These numbers may change over time and are updated at least annually by the Advisor.

Gahler Financial generally imposes a minimum account size of \$500,000 for establishing a relationship; however, this amount might be lowered depending on certain client situations or needs.

Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss

A. Methods of Analysis

Research and analysis from Gahler Financial are derived from numerous sources, including financial media companies, third-party research materials, Internet sources, and review of company activities, including annual reports, prospectuses, press releases and research prepared by others.

Gahler Financial primarily employs a fundamental analysis method in developing investment strategies for its Clients. Fundamental analysis utilizes economic and business indicators as investment selection criteria. These criteria are generally ratios and trends that may indicate the overall strength and financial viability of the entity being analyzed. Assets are deemed suitable if they meet certain criteria to indicate that they are a strong investment with a value discounted by the market. While this type of analysis helps the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in the fundamental analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

As noted above, Gahler Financial generally employs a long-term investment strategy for its Clients, as consistent with their financial goals. Gahler Financial will typically hold all or a portion of a security for more than a year but may hold for shorter periods for the purpose of rebalancing a portfolio or meeting the cash needs of Clients. At times, Gahler Financial may also buy and sell positions that are more short-term in nature, depending on the goals of the Client and/or the fundamentals of the security, sector or asset class.

B. Risk of Loss

Investing in securities involves certain investment risks. Securities may fluctuate in value or lose value. Clients should be prepared to bear the potential risk of loss. Gahler Financial will assist Clients in determining an appropriate strategy based on their tolerance for risk and other factors noted above. However, there is no guarantee that a Client will meet their investment goals.

While the methods of analysis help the Advisor in evaluating a potential investment, it does not guarantee that the investment will increase in value. Assets meeting the investment criteria utilized in these methods of analysis may lose value and may have negative investment performance. The Advisor monitors these economic indicators to determine if adjustments to strategic allocations are appropriate. More details on the Advisor's review process are included below in "Item 13 – Review of Accounts".

Each Client engagement will entail a review of the Client's investment goals, financial situation, time horizon, tolerance for risk and other factors to develop an appropriate strategy for managing a Client's account. Client participation in this process, including full and accurate disclosure of requested information, is

essential for the analysis of a Client's account. The Advisor shall rely on the financial and other information provided by the Client or their designees without the duty or obligation to validate the accuracy and completeness of the provided information. It is the responsibility of the Client to inform the Advisor of any changes in financial condition, goals or other factors that may affect this analysis.

The risks associated with a particular strategy are provided to each Client in advance of investing Client accounts. The Advisor will work with each Client to determine their tolerance for risk as part of the portfolio construction process.

Past performance is not a guarantee of future returns. Investing in securities and other investments involve a risk of loss that each Client should understand and be willing to bear. Clients are reminded to discuss these risks with the Advisor.

Item 9 – Disciplinary Information

There are no legal, regulatory or disciplinary events involving Gahler Financial or any of its management persons. Gahler Financial values the trust you place in us. As we advise all Clients, we encourage you to perform the requisite due diligence on any advisor or service provider with whom you partner. Our backgrounds are on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching by our firm name or our CRD# 292785.

Item 10 – Other Financial Industry Activities and Affiliations

Neither Gahler Financial nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

Item 11 – Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

A. Code of Ethics

Gahler Financial has implemented a Code of Ethics (the “Code”) that defines our fiduciary commitment to each Client. This Code applies to all persons associated with Gahler Financial (our “Supervised Persons”). The Code was developed to provide general ethical guidelines and specific instructions regarding our duties to you, our Client. Gahler Financial and its Supervised Persons owe a duty of loyalty, fairness and good faith towards each Client. It is the obligation of Gahler Financial’s Supervised Persons to adhere not only to the specific provisions of the Code, but also to the general principles that guide the Code. The Code covers a range of topics that address employee ethics and conflicts of interest. To request a copy of our Code, please contact us at (512) 981-6372.

B. Personal Trading with Material Interest

Gahler Financial allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Gahler Financial does not act as principal in any transactions. In addition, the Advisor does not act as the general partner of a fund, or advise an investment company. Gahler Financial does not have a material interest in any securities traded in Client accounts.

C. Personal Trading in Same Securities as Clients

Gahler Financial allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients. Owning the same securities we recommend (purchase or sell) to you presents a conflict of interest that, as fiduciaries, we must disclose to you and mitigate through policies and procedures. As noted above, we have adopted the Code to address insider trading (material non- public information controls); gifts and entertainment; outside business activities and personal securities reporting. When trading for personal accounts, Supervised Persons may have a conflict of interest if trading in the same securities. The fiduciary duty to act in the best interest of its Clients can potentially be violated if personal trades are made with more advantageous terms than Client trades, or by trading based on material

non-public information. This risk is mitigated by Gahler Financial requiring reporting of personal securities trades by its Supervised Persons for review by the Chief Compliance Officer ("CCO") or delegate. We have also adopted written policies and procedures to detect the misuse of material, non-public information.

D. Personal Trading at Same Time as Client

While Gahler Financial allows our Supervised Persons to purchase or sell the same securities that may be recommended to and purchased on behalf of Clients, such trades are typically aggregated with Client orders or traded afterwards. At no time will Gahler Financial, or any Supervised Person of Gahler Financial, transact in any security to the detriment of any Client.

Item 12 – Brokerage Practices

A. Recommendation of Custodian[s]

Gahler Financial does not have discretionary authority to select the broker-dealer/custodian for custodial and execution services. The Client will select the broker-dealer or custodian (herein the "Custodian") to safeguard Client assets and authorize Gahler Financial to direct trades to this Custodian as agreed in the investment advisory agreement. Further, Gahler Financial does not have the discretionary authority to negotiate commissions on behalf of our Clients on a trade-by-trade basis.

Where Gahler Financial does not exercise discretion over the selection of the Custodian, it may recommend the Custodian[s] to Clients for execution and/or custodial services. Clients are not obligated to use the recommended Custodian and will not incur any extra fee or cost associated with using a broker not recommended by Gahler Financial.

The Advisor participates in the TD Ameritrade Institutional program. TD Ameritrade Institutional is a division of TD Ameritrade, Inc. ("TD Ameritrade"), member FINRA/SIPC. TD Ameritrade is an independent and unaffiliated SEC-registered broker-dealer. TD Ameritrade offers to independent investment Advisors services, which include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from TD Ameritrade through its participation in the program. (Please see the disclosure under "Item 14 - Client Referrals and Other Compensation" below.)

The Advisor also recommends Fidelity Brokerage Services LLC as a custodian.

1. Soft Dollars - Gahler Financial has access to research, products, or other services from its broker/dealer in connection with client securities transactions ("soft dollar benefits") consistent with (and not outside of) the safe harbor contained in Section 28(e) of the Securities Exchange Act of 1934, as amended, and may consider these benefits in recommending brokers. There can be no assurance that any particular client will benefit from any particular soft dollar research or other benefits. Gahler Financial benefits by not having to produce or pay for the research, products or services, and Gahler Financial will have an incentive to recommend a broker dealer based on receiving research or services. Clients should be aware that Gahler Financial's acceptance of soft dollar benefits may result in higher commissions charged to the client.
2. Brokerage Referrals - Gahler Financial does not receive any compensation from any third party in connection with the recommendation for establishing a brokerage account.
3. Directed Brokerage - All Clients are serviced on a "directed brokerage basis", where Gahler Financial will place trades within the established account[s] at the custodian designated by the Client. Further, all Client accounts are traded within their respective brokerage account[s]. The Advisor will not engage in any principal transactions (i.e., trade of any security from or to the Advisor's own account) or cross transactions with other Client accounts (i.e., purchase of a security into one Client account from another Client's account[s]). In selecting the Custodian, Gahler Financial will not be obligated to select competitive bids on securities transactions and does not have an obligation to seek the lowest available transaction costs. These costs are determined by the designated Custodian.

B. Aggregating and Allocating Trades

The primary objective in placing orders for the purchase and sale of securities for Client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Gahler Financial will execute its transactions through an unaffiliated broker-dealer selected by the Client. Gahler Financial may aggregate orders in a block trade or trades when securities are purchased or sold through the same broker-dealer for multiple (discretionary) accounts in the same trading day. If a block trade cannot be executed in full at the same price or time, the securities actually purchased or sold by the close of each business day must be allocated in a manner that is consistent with the initial pre-allocation or other written statement. This must be done in a way that does not consistently advantage or disadvantage any particular Client accounts.

Item 13 – Review of Accounts

A. Frequency of Reviews

Securities in Client accounts are monitored on a regular and continuous basis by Kasey Gahler, President & Chief Compliance Officer of Gahler Financial. Formal reviews are generally conducted at least quarterly or more or less frequently depending on the needs of the Client.

B. Causes for Reviews

In addition to the investment monitoring noted in Item 13.A., each Client account shall be reviewed at least quarterly. Reviews may be conducted more or less frequently at the Client's request. Accounts may be reviewed as a result of major changes in economic conditions, known changes in the Client's financial situation, and/or large deposits or withdrawals in the Client's account. The Client is encouraged to notify Gahler Financial if changes occur in the Client's personal financial situation that might adversely affect the Client's investment plan. Additional reviews may be triggered by material market, economic or political events.

C. Review Reports

The Client will receive brokerage statements no less than quarterly from the trustee or Custodian. These brokerage statements are sent directly from the Custodian to the Client. The Client may also establish electronic access to the Custodian's website so that the Client may view these reports and their account activity. Client brokerage statements will include all positions, transactions and fees relating to the Client's account[s]. The Advisor may also provide Clients with periodic reports regarding their holdings, allocations, and performance.

Item 14 - Client Referrals and Other Compensation

A. Compensation Received by Gahler Financial

Gahler Financial is a fee-based advisory firm, that is compensated solely by its Clients and not from any investment product. Gahler Financial does not receive commissions or other compensation from product sponsors, broker-dealers or any un-related third party. Gahler Financial may refer Clients to various unaffiliated, non-advisory professionals (e.g. attorneys, accountants, estate planners) to provide certain financial services necessary to meet the goals of its Clients. Likewise, Gahler Financial may receive non-compensated referrals of new Clients from various third-parties.

Participation in Institutional Advisor Platform

Gahler Financial participates in the institutional advisor program (the "Program") offered by TD Ameritrade. TD Ameritrade offers to independent investment advisor services which include custody of securities, trade execution, clearance and settlement of transactions. Gahler Financial receives some benefits from TD Ameritrade through its participation in the Program.

As part of the Program, Gahler Financial may recommend TD Ameritrade to clients for custody and brokerage services. There is no direct link between Gahler Financial's participation in the Program and the investment advice it gives to its clients, although Gahler Financial 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): Morningstar research; receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk serving Gahler Financial 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 Gahler Financial's 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 Gahler Financial by third party vendors. TD Ameritrade may also pay for business consulting and professional services received by Gahler Financial's related persons. Some of the products and services made available by TD Ameritrade through the Program may benefit Gahler Financial but may not benefit its client accounts. These products or services may assist Gahler Financial in managing and administering client accounts, including accounts not maintained at TD Ameritrade. Other services made available by TD Ameritrade are intended to help Gahler Financial manage and further develop its business enterprise. The benefits received by Gahler Financial or its personnel through participation in the Program do not depend on the amount of brokerage transactions directed to TD Ameritrade. As part of its fiduciary duties to clients, Gahler Financial endeavors at all times to put the interests of its clients first. Clients should be aware, however, that the receipt of economic benefits by Gahler Financial or its related persons in and of itself creates a conflict of interest and may indirectly influence the Gahler Financial's choice of TD Ameritrade for custody and brokerage services.

B. Client Referrals from Solicitors

Gahler Financial does not engage paid solicitors for Client referrals.

Item 15 – Custody

Gahler Financial does not accept or maintain custody of any Client accounts, except for the authorized deduction of the Advisor's fees. All Clients must place their assets with a qualified Custodian. Clients are required to engage the Custodian to retain their funds and securities and direct Gahler Financial to utilize that Custodian for the Client's security transactions. Clients should review statements provided by the Custodian and compare to any reports provided by Gahler Financial to ensure accuracy, as the Custodian does not perform this review.

Custody is also disclosed in Form ADV because Gahler Financial has authority to transfer money from client account(s), which constitutes a standing letter of authorization (SLOA). Accordingly, Gahler Financial will follow the safeguards specified by the SEC rather than undergo an annual audit. For more information about custodians and brokerage practices, see "Item 12 - Brokerage Practices".

Item 16 – Investment Discretion

Gahler Financial generally has discretion over the selection and amount of securities to be bought or sold in Client accounts without obtaining prior consent or approval from the Client. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the Client and agreed to by Gahler Financial. Discretionary authority will only be authorized upon full disclosure to the Client. The granting of such authority will be evidenced by the Client's execution of an investment advisory agreement containing all applicable limitations to such authority. All discretionary trades made by Gahler Financial will be in accordance with each Client's investment objectives and goals.

Item 17 – Voting Client Securities

Gahler Financial does not accept proxy-voting responsibility for any Client. Clients will receive proxy statements directly from the Custodian. The Advisor will assist in answering questions relating to proxies, however, the Client retains the sole responsibility for proxy decisions and voting,

Item 18 – Financial Information

Neither Gahler Financial, nor its management, have any adverse financial situations that would reasonably impair the ability of Gahler Financial to meet all obligations to its Clients. Neither Gahler Financial, nor any of its advisory persons, has been subject to a bankruptcy or financial compromise. Gahler Financial is not required to deliver a balance sheet along with this Disclosure Brochure as the Advisor does not collect fees of \$500 or more for services to be performed six months or more in advance.

Item 19 – Requirements for State Registered Advisors

A. Educational Background and Business Experience of Principal Officer

The Principal Officer of Gahler Financial is Kasey Gahler. Information regarding the formal education and background of Kasey Gahler is included in Item 2 of Part 2B below.

B. Other Business Activities of Principal Officer

Kasey Gahler has additional business activities that are detailed in “Item 10 - Other Financial Activities and Affiliations”.

C. Performance Fee Calculations

Gahler Financial does not charge performance-based fees for its investment advisory services. The fees charged by Gahler Financial are as described in “Item 5 – Fees and Compensation” above and are not based upon the capital appreciation of the funds or securities held by any Client.

D. Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Gahler Financial or Kasey Gahler. Neither Gahler Financial nor Kasey Gahler have ever been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Gahler Financial or Kasey Gahler.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Gahler Financial or Kasey Gahler.

E. Material Relationships with Issuers of Securities

Neither Gahler Financial nor Kasey Gahler has any relationships or arrangements with issuers of securities.

Form ADV Part 2B – Brochure Supplement

for

Kasey C. Gahler
President & Chief Compliance Officer

Effective: August 17, 2022

This Form ADV 2B (“Brochure Supplement”) provides information about the background and qualifications of Kasey C. Gahler (CRD# 4535692) in addition to the information contained in the Gahler Financial, LLC (“Gahler Financial” or the “Advisor”, CRD# 292785) Disclosure Brochure. If you have not received a copy of the Disclosure Brochure or if you have any questions about the contents of the Gahler Financial Disclosure Brochure or this Brochure Supplement, please contact us at (512) 981-6372.

Additional information about Mr. Gahler is available on the SEC’s Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4535692.

Item 2 – Educational Background and Business Experience

Kasey C. Gahler, born in 1978, is dedicated to advising Clients of Gahler Financial as the President & Chief Compliance Officer. Mr. Gahler earned a Bachelor's of Science in Finance from Minnesota State University in 2000. Additional information regarding Mr. Gahler's employment history is included below.

Employment History:

President & Chief Compliance Officer, Gahler Financial, LLC	11/2017 to Present
Financial Advisor, Cambridge Investment Research, Inc.	09/2007 to 04/2017
Financial Advisor/IAR, Cambridge Investment Research Advisors, Inc.	09/2007 to 03/2018
Registered Representative, Banc of America Investment Services, Inc.	07/2007 to 08/2007
Investment Advisor Representative, Marathon Advisors Inc	08/2002 to 06/2007
Registered Representative, CRI Securities, LLC	06/2002 to 06/2007
Agent, Minnesota Life	06/2002 to 06/2007
Registered Representative, Securian Financial Services, Inc.	06/2002 to 06/2007

Item 3 – Disciplinary Information

There are no legal, civil or disciplinary events to disclose regarding Mr. Gahler. Mr. Gahler has never been involved in any regulatory, civil or criminal action. There have been no client complaints, lawsuits, arbitration claims or administrative proceedings against Mr. Gahler.

Securities laws require an advisor to disclose any instances where the advisor or its advisory persons have been found liable in a legal, regulatory, civil or arbitration matter that alleges violation of securities and other statutes; fraud; false statements or omissions; theft, embezzlement or wrongful taking of property; bribery, forgery, counterfeiting, or extortion; and/or dishonest, unfair or unethical practices. As previously noted, there are no legal, civil or disciplinary events to disclose regarding Mr. Gahler.

However, we do encourage you to independently view the background of Mr. Gahler on the Investment Adviser Public Disclosure website at www.adviserinfo.sec.gov by searching with his full name or his Individual CRD# 4535692.

Item 4 – Other Business Activities

Mr. Gahler is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5 – Additional Compensation

Other than salary, annual bonuses, or regular bonuses, Mr. Gahler does not receive any economic benefit from any person, company, or organization, in exchange for providing clients advisory services through Gahler Financial.

Item 6 – Supervision

Mr. Gahler serves as the President and Chief Compliance Officer of Gahler Financial. Mr. Gahler can be reached at (512) 981-6372.

Gahler Financial has implemented a Code of Ethics and internal compliance that guide each Supervised Person in meeting their fiduciary obligations to Clients of Gahler Financial. Further, Gahler Financial is subject to

regulatory oversight by various agencies. These agencies require registration by Gahler Financial and its Supervised Persons. As a registered entity, Gahler Financial is subject to examinations by regulators, which may be announced or unannounced. Gahler Financial is required to periodically update the information provided to these agencies and to provide various reports regarding the business activities and assets of the Advisor.

Item 7 – Requirements for State Registered Advisors

Mr. Gahler does not have any additional information to disclose.

Privacy Policy

Effective: March 8, 2018

Our Commitment to You

Gahler Financial, LLC ("Gahler Financial" or the "Advisor") is committed to safeguarding the use of personal information of our Clients (also referred to as "you" and "your") that we obtain as your Investment Advisor, as described here in our Privacy Policy ("Policy").

Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything that we can to maintain that trust. Gahler Financial (also referred to as "we", "our" and "us") protects the security and confidentiality of the personal information we have and implements controls to ensure that such information is used for proper business purposes in connection with the management or servicing of our relationship with you.

Gahler Financial does not sell your non-public personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you, as discussed below.

Details of our approach to privacy and how your personal non-public information is collected and used are set forth in this Policy.

Why you need to know?

Registered Investment Advisors ("RIAs") must share some of your personal information in the course of servicing your account. Federal and State laws give you the right to limit some of this sharing and require RIAs to disclose how we collect, share, and protect your personal information.

What information do we collect from you?

Driver's license number	Date of birth
Social security or taxpayer identification number	Assets and liabilities
Name, address and phone number(s)	Income and expenses
E-mail address(es)	Investment activity
Account information (including other institutions)	Investment experience and goals

What Information do we collect?

Custody, brokerage and advisory agreements	Account applications and forms
Other advisory agreements and legal documents	Investment questionnaires and suitability documents
Transactional information with us or others	Other information needed to service account

How do we protect your information?

To safeguard your personal information from unauthorized access and use we maintain physical, procedural and electronic security measures. These include such safeguards as secure passwords, encrypted file storage and a secure office environment. Our technology vendors provide security and access control over personal information and have policies over the transmission of data. Our associates are trained on their responsibilities to protect Client's personal information.

We require third parties that assist in providing our services to you to protect the personal information they receive from us.

How do we share your information?

An RIA shares Client personal information to effectively implement its services. In the section below, we list some reasons we may share your personal information.

Basis For Sharing	Do we share?	Can you limit?
Servicing our Clients We may share non-public personal information with non-affiliated third parties (such as administrators, brokers, custodians, regulators, credit agencies, other financial institutions) as necessary for us to provide agreed upon services to you, consistent with applicable law, including but not limited to: processing transactions; general account maintenance; responding to regulators or legal investigations; and credit reporting.	Yes	No
Marketing Purposes Gahler Financial does not disclose, and does not intend to disclose, personal information with non-affiliated third parties to offer you services. Certain laws may give us the right to share your personal information with financial institutions where you are a customer and where Gahler Financial or the client has a formal agreement with the financial institution. We will only share information for purposes of servicing your accounts, not for marketing purposes.	No	Not Shared
Authorized Users Your non-public personal information may be disclosed to you and persons that we believe to be your authorized agent(s) or representative(s).	Yes	Yes
Information About Former Clients Gahler Financial does not disclose and does not intend to disclose, non-public personal information to non-affiliated third parties with respect to persons who are no longer our Clients. Previous clients privacy and sharing practices are treated in the same way as when they were clients.	No	Not Shared

Changes to our Privacy Policy

We will send you a copy of this Policy annually for as long as you maintain an ongoing relationship with us.

Periodically we may revise this Policy and will provide you with a revised policy if the changes materially alter the previous Privacy Policy. We will not, however, revise our Privacy Policy to permit the sharing of non-public personal information other than as described in this notice unless we first notify you and provide you with an opportunity to prevent the information sharing.

Any Questions?

You may ask questions or voice any concerns, as well as obtain a copy of our current Privacy Policy by contacting us at (512) 981-6372.