

FORM ADV

Uniform Application for Investment Adviser Registration

Part II - Page 1

OMB APPROVAL

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Name of Investment Adviser: William Hilary Keffer d/b/a Keffer Financial Planning					
Address:	(Number and Street)	(City)	(State)	(Zip Code)	Area Code: Telephone Number:
	511 West Wesley Street	Wheaton	IL	60187	630-842-5609

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

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

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

1. A. Advisory Services and Fees. (check the applicable boxes)

For each type of service provided, state the approximate % of total advisory billings from that service. (See instruction below.)

Applicant:

- (1) Provides investment supervisory services %
- (2) Manages investment advisory accounts not involving investment supervisory services..... %
- (3) Furnishes investment advice through consultations not included in either service described above... 60 %
- (4) Issues periodicals about securities by subscription %
- (5) Issues special reports about securities not included in any service described above..... %
- (6) Issues, not as part of any service described above, any charts, graphs, formulas, or other devices which clients may use to evaluate securities..... %
- (7) On more than an occasional basis, furnishes advice to clients on matters not involving securities... 40 %
- (8) Provides a timing service %
- (9) Furnishes advice about securities in any manner not described above..... %

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

- B. Does applicant call any of the services it checked above financial planning or some similar term? Yes No

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

- (1) A percentage of assets under management
- (2) Hourly charges
- (3) Fixed fees (not including subscription fees)
- (4) Subscription fees
- (5) Commissions
- (6) Other

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

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

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

- A. Individuals
- B. Banks or thrift institutions
- C. Investment companies
- D. Pension and profit sharing plans
- E. Trusts, estates, or charitable organizations
- F. Corporations or business entities other than those listed above
- G. Other (describe on Schedule F)

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

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

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

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

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

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

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

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

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

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

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5. Education and Business Standards.

Are there any general standards of education or business experience that applicant requires of those involved in determining or giving investment advice to clients? Yes No

(If yes, please describe these standards on Schedule F)

6. Education and Business Background.

For:

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

On Schedule F, give the:

- name
- year of birth
- formal education after high school
- business background for the preceding five years

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

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

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

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

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

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

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

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

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9. Participation or Interest in Client Transactions.

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

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

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

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

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

Yes No

(If yes, describe on Schedule F)

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

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

Keffer Financial Planning provides financial planning services relative to Clients' cash flow, management of debt, insurance, college, retirement, taxes, asset allocation, and investment selection. Services are offered on an hourly fee-only or flat-fee per project basis. The engagement is concluded upon delivery of the plan or advice to the Client. There are no ongoing automatic reviews. However, clients are encouraged to have periodic financial check ups and portfolio reviews. It is the Client's responsibility to initiate these reviews. William H. Keffer, CFP, ChFC, CLU provides all recommendations and advice.

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

Keffer Financial Planning does not provide ongoing performance reporting. Clients receive account statements directly from the investment firm or firms in which they hold their assets. When they desire a portfolio review with Keffer Financial Planning, they provide copies of current statements.

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12. Investment or Brokerage Discretion.

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

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

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

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

13. Additional Compensation.

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

- A. is paid cash by or receives some economic benefit (including commissions, equipment or non-research services) from a non-client in connection with giving advice to clients? Yes No
- B. directly or indirectly compensates any person for client referrals? Yes No

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

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

- has custody of client funds or securities (unless applicant is registered or registering only with the Securities and Exchange Commission); or
 - requires prepayment of more than \$500 in fees per client and 6 or more months in advance
- Has applicant provided a Schedule G balance sheet?..... Yes No

**Schedule F of
FORM ADV
Continuation Sheet for Form ADV Part II**

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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: William Hilary Keffer d/b/a Keffer Financial Planning	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
1.A(3)(7)	<p>Keffer Financial Planning provides fee-only, hourly, as-needed Financial Planning and Investment Advisory Services to individuals and families from all walks of life. These services may be general in nature or focused on particular areas of interest or need, depending upon each Client's unique circumstances.</p> <p>The core business of Keffer Financial Planning is providing financial planning services to individuals. Advice is rendered in the areas of cash flow and debt management, risk management, college funding, retirement planning, estate planning, tax planning, asset allocation and investment selection. The Advisor employs fundamental, long-term financial planning and investment strategies. The firm also offers divorce financial analysis and assists small employers in establishing retirement plans. In the area of divorce financial analysis, special emphasis is placed on the Collaborative divorce process. Brief descriptions of each of the types of planning offered are provided below. An estimate of the time needed to do each plan separately is shown.</p> <p>Cash flow and debt management planning involves a review of current cash flow to determine if clients are covering current expenses and obligations and to determine the feasibility of additional savings. Suggestions for budgetary adjustments are offered to bring savings into alignment with objectives. The firm will also evaluate current liabilities for suitability for the stated purpose, tax efficiency and cost efficiency. Time: 4 hours.</p> <p>Risk management planning analyzes exposure to the major risks of premature death, disability, and the need for long term care. If there is exposure, insurance and non-insurance solutions will be discussed. Plans will suggest amounts, sources, and funding for indicated insurance solutions. The firm will also do a cursory assessment of property and liability risk exposures. While outside experts need to be called upon for technical help in this area, Keffer Financial Planning's process will identify such things as inadequate liability insurance limits and the potential need for umbrella coverage. Time: 4 hours.</p> <p>College planning projects the amount of assets that will be needed to cover college costs and suggests amounts necessary to save or invest now to achieve the client's goals based on client inputs, such as the number of children, ages, types of colleges anticipated and percentage of costs the clients wish to cover. Time: 3 hours.</p> <p>Retirement planning is probably the most significant area of concern for most clients. The firm's plans will assess the amount of capital that will be necessary to fund retirement given the clients' target date, desired income, current savings, income sources, and ability to save more now. Time: 6 hours.</p> <p>Estate planning involves a review for the existence of basic planning documents, such as wills, healthcare powers of attorney, and trusts. This part of the process will also project likely estate tax liability and, if present, suggest tools such as bypass trusts, insurance trusts, lifetime gifting, etc. to mitigate the problem. Time: 4 hours.</p> <p>Tax planning in this context means identifying potentially more tax-efficient ways to achieve financial objectives. The most common example is the situation in which clients are not maximizing their opportunity to save on a tax deferred basis in 401(k) and IRA plans. The planner will also help clients analyze whether Roth or traditional IRAs make more sense for their circumstance. Time: 3 hours.</p>

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

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Item of Form (identify)	Answer
1.C (2)	<p>Asset allocation planning involves an assessment of risk tolerance, time horizon, objectives, and challenges to determine the most appropriate mix of asset classes to meet the client's goals, given the rate of return needed and their risk tolerance. The Advisor uses the suggested asset allocation logic embedded in financial planning software package "Money Guide Pro" but may temper its suggestions with asset allocation models suggested by known and established experts in the field. Once an appropriate mix of asset classes has been agreed upon, clients may receive more specific investment advice. Time: 3 hours.</p> <p>For specific investment advice, the first step is identifying the appropriate vehicle (mutual funds, individual securities, etc.) for the clients' situation. Once the vehicle is established, the Advisor uses Morningstar and other data to screen among the many alternatives for the most appropriate solution for that client.</p> <p>Among other criteria, the Advisor will consider an investment's fit within the target allocation, style discipline, expenses, risk, and long term performance. Time: 3 hours.</p> <p>With respect to the planning process, the Advisor first conducts an initial interview and gathers data to assist the Client in determining specific needs, goals, objectives and tolerance for risk. Advisor then prepares an analysis of the current financial situation and possible future scenarios, when appropriate. Next, the Advisor presents the analysis and a written summary of the significant observations, assumptions and recommendations over each area in which the Advisor was engaged to provide advice. Upon the completion of this presentation the engagement is concluded. Clients may re-engage Keffer Financial Planning as needed. Periodic financial check-ups are recommended and it is the Client's responsibility to initiate these reviews.</p> <p>Divorce financial analysis includes gathering and organizing data, preparing budgets, projecting results of various support and asset division proposals, and promoting awareness of financial issues unique to the divorce process. The Advisor also serves as the "financial neutral" in Collaborative divorce cases.</p> <p>Keffer Financial Planning assists small business owners and professionals in establishing employee retirement plans. Specific tasks include screening for the appropriate type of plan, evaluating administrators, identifying and comparing all costs, developing criteria for and menus of investment choices, establishing and implementing the plan and providing employee education.</p> <p>Keffer Financial Planning may also conduct group educational workshops on financial planning topics and, in some cases, impose a fee based on its normal hourly rate. Generally, an employer, civic or non-profit group sponsoring the workshop will pay any fees. If the sponsor is a community college or park district, there may be a charge to attendees. The fee will be determined by the sponsor and published on the workshop announcement or invitation.</p> <p>1. C (2) Fees for financial planning and investment advisory services will be based on a rate of \$190 per hour. The number of hours depends on how many of the planning components the Client wants and the complexity of their situation. For example, if a middle-aged couple hires the Advisor for a comprehensive plan, including insurance, college funding, retirement, asset allocation and investment analyses and recommendations, the Advisor might estimate a fee range from \$1,520 (8 hours) to \$2,850 (15 hours). Note that this total is less than the sum of its parts above, as data entry is done just once. This assumes the couple has a fairly normal number of</p>

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: William Hilary Keffer d/b/a Keffer Financial Planning	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
4. A, B & C	<p>accounts and positions within each account. The Advisor will be using a Fee Estimation Worksheet which budgets time by function, such as data entry, analysis, writing recommendations, presentation, and so on. Barring any unusual circumstances, the fee will not exceed the maximum quoted. No performance related or asset management fees are charged. Hourly fees are billed in six (6) minute increments. Projects spanning more than three months will be billed quarterly. Fees are not collected for services to be provided more than 6 months in advance. Keffer Financial Planning does not and will not have custody of Client funds or securities.</p> <p>Fees for divorce financial analysis and employer retirement plan work are also based on the hourly model. Typical fees in these areas are \$2,500 to \$5,000.</p> <p>Fees for educational workshops depend on the sponsor. For employers and non-profits groups, the charge will be based on \$190 per hour and typically covered by the sponsor. The estimated total time: 6 hours. For colleges and park districts, fees will be determined by the community college or park district. Typically, these events involve fees under \$100 for one to three sessions of a couple of hours each.</p> <p>Keffer Financial Planning requires a deposit for initial engagements in the amount of the lesser of \$500 or 50% of the lower end of the estimated fee range. The balance of fees due are payable immediately upon presentation of the plan or advice to Client. Services to be provided and the anticipated fee range are detailed in the written Consulting Services Agreement executed by all parties.</p> <p>Either party may terminate an engagement upon written notice within 5 days of signing the Consulting Services Agreement, at which time no fees would be due. Should Client terminate the engagement after this date, Client is responsible and will be invoiced for any time charges incurred by Advisor in the preparation of their Plan. Fees paid to Keffer Financial Planning for financial planning and advisory services are completely separate from the fees and expenses charged by mutual fund companies and their portfolio managers. A complete explanation of these fees and expenses is provided in each mutual fund prospectus. Clients are encouraged to read the prospectus before investing. Client may also incur transaction costs or administration fees from broker/dealers, trust companies or other service providers. Clients are encouraged to obtain a complete schedule of these fees from the service provider prior to entering into any engagement. Keffer Financial Planning does not receive any portion of these other fees. The only compensation received by Keffer Financial Planning is the hourly fees paid directly by Client.</p> <p>4. A, B & C Method of Analysis and Investment Strategies If Advisor is engaged to provide investment advice, the Client's current financial situation, needs, goals, objectives and tolerance for risk are first evaluated. Asset allocation and investment policy decisions are then made to, in Advisor's best judgment, help the Client achieve their overall financial objectives while minimizing risk exposure. Asset allocation is a key component of investment portfolio design. Advisor believes that the appropriate allocation of assets across diverse investment categories (stock vs. bond, foreign vs. domestic, large cap vs. small cap, high quality vs. high yield, etc.) is the primary determinant of portfolio returns and critical in the long-term success of financial objectives.</p>

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Item of Form (identify)	Answer
5.	<p>Advisor employs fundamental, long-term, buy-and-hold philosophies and approaches in their investment selection and implementation strategies. Recommendations provided are based on publicly available reports, analysis, research materials, computerized asset allocation models, and various subscription services. In limited circumstances, Advisor may provide advice to Clients interested in trading securities.</p> <p>5. Presently, all Client advice is provided by sole proprietor, William H. Keffer. Keffer is a Certified Financial Planner (CFP)™ practitioner in good standing with the Certified Financial Planners Board of Standards. His educational credentials include a B.A. in English, an MBA in Finance and the Chartered Financial Consultant and Chartered Life Underwriter designations. Keffer fulfilled the educational requirements for designation as a CFP® by passing the five core courses of the College for Financial Planning. He is also a Certified Divorce Financial Analyst™ with special training to fulfill the role of financial neutral in collaborative divorce cases.</p>
6.	<p>6. Education and Business Background: William Keffer, CFP®, CLU, ChFC, CDFP Year of Birth: 1952</p> <p>Education: Dickinson College, Carlisle, PA, Bachelor of Arts- English (1975) St. Joseph's University, Philadelphia, PA, Masters in Business Administration- Finance (1991) College for Financial Planning, Denver, CO, CFP® Certification Professional Education Program (2004) American College, Philadelphia, PA, Chartered Life Underwriter Certification (1994) American College, Philadelphia, PA, Chartered Financial Consultant Certification (1995) Institute for Divorce Financial Analysts, Southfield, MI, Divorce Financial Analyst Certification (2008)</p> <p>Business Background: 2007-Present: Principal, Keffer Financial Planning 2005-2007: Smith Barney-Financial Advisor 2004: WHK Consulting-Principal 2002-2004: North American Company for Life and Health Insurance-Vice President</p> <p>1976-2002: AIG American General (All immediately below with the same company through mergers) 1998-2002: AIG / American General Bancassurance Services-Senior Vice President 1995-1998: USLIFE Agency Services, and USLIFE Credit Life Insurance Company-Senior Vice President, Chief Marketing Officer and Product Manager 1985-1995: USLIFE Agency Services, Inc.-Vice President 1984-1985: American Health and Life Insurance Co.-Director of Sales (year away from USLIFE) 1976-1984: Security of America Life Insurance Company-Field Vice President 1976: Fidelity Union Life Insurance Company-Agent</p>
9. E	<p>9. E Participation or Interest in Client Transactions At times Advisor and other related parties to Advisor may hold positions in securities (typically mutual funds) that may also be recommended to Clients. However, at no time will Advisor or any related party receive preferential treatment over Clients. Advisor enforces the applicable rules of the Investment Advisors Act of 1940, including the prohibition against insider trading. Advisor maintains the required personal securities</p>

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: William Hilary Keffer d/b/a Keffer Financial Planning	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer
12. B.	<p>transaction records.</p> <p>12. B Brokerage Recommendations Keffer Financial Planning is not associated with any broker/dealer firm. The Advisor may recommend the services of investment firms, such as Vanguard or Fidelity, or discount brokers, such as Charles Schwab, TD Ameritrade or Scottrade. These recommendations are based on individual Client needs, total costs and ease of use for Clients.</p>
13. A.	<p>13.A Additional Compensation All compensation paid to Keffer Financial Planning with respect to specific advice to individuals is paid directly by the Client.</p> <p>Advisor may enter into partnership with other RIA financial planning firms, discount brokers, mutual funds companies and other financial institutions to sponsor public education seminars. Financial educational seminars may be provided to the public at no cost and do not involve the sale of any investment products, but are purely educational. Any cash benefits received from sponsorship partners is used to off-set the expenses associated with bringing the financial education seminars to the public. Such expenses would include ads in local newspapers, conference room rentals, seminar material, etc. All sponsors share in expenses. All financial educational seminars presented to the general public are non-profit in nature.</p> <p>As a member of the Garrett Planning Network (GPN), Advisor has chosen to "opt-in" to a marketing program established between GPN and The Motley Fool (www.fool.com). The program is in place to promote GPN's advisers as fee-only financial planners that members of The Motley Fool community may be interested in working with, and although this is a marketing program only, Advisor has chosen to opt-in to generate additional prospects for its financial planning business. The fee paid is a flat monthly fee and is paid regardless of whether any leads are generated or become clients. Thus, Advisor does not believe this is a "solicitor" relationship but feels the relationship between the two is important and should be disclosed to its clients and prospective clients.</p> <p>Firm Privacy Statement: To conduct regular business Keffer Financial Planning may collect non-public personal information about its clients from sources such as:</p> <ul style="list-style-type: none"> · Information reported by clients on application or other forms clients provide to the investment adviser. · Information about clients' transactions with the investment adviser and its affiliates or others. · Conversations between clients and the firm's representatives. <p>The investment adviser will share non-public information solely to service client accounts. The investment adviser will not disclose any non-public personal information about its clients or former clients to anyone, except as permitted by law. If a client decides to close the client's account(s) with the investment adviser or becomes an inactive client, the investment adviser will continue to adhere to its privacy policy and practices with respect to that client as described in this notice.</p>

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1. Full name of applicant exactly as stated in Item 1A of Part I of Form ADV: William Hilary Keffer d/b/a Keffer Financial Planning	IRS Empl. Ident. No.:
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Item of Form (identify)	Answer

(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: William Hilary Keffer d/b/a Keffer Financial Planning	SEC File Number: 801-	Date: 02/25/2010
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FORM ADV
Continuation Sheet for Form ADV Part II**

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Applicant:
William Hilary Keffer d/b/a Keffer
Financial Planning

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