



*Old Field
Advisors LLC*

A New York Registered Investment Advisor

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Form ADV Part 2

February 2, 2012

This brochure provides information about the qualifications and business practices of Old Field Advisors LLC. If you have any questions about the contents of this brochure, please contact us at 631-751-7230 or info@oldfieldadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. While the firm and its personnel are registered with the State of New York, registration does not imply a specific level of skill or training on the part of the firm or its personnel.

Additional information about Old Field Advisors LLC is available from the "Investment Adviser Search" on the SEC's website at www.adviserinfo.sec.gov

Material Changes: Pursuant to SEC Release IA-3060, the firm has amended the format of its advisory brochure since its previous version of Form ADV Part II, dated June 12, 2010. Although the document content, disclosures, and advisory fees have generally remained the same, the firm has enhanced its disclosure. Clients and prospective clients are encouraged to review this document in its entirety.

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Part 2B Advisory Personnel Information

Section 1 Advisory Business

Old Field Advisors LLC is a New York-domiciled registered investment advisor providing *fee-only* financial planning, investment consultation and investment management services. As a registered investment advisor, Old Field Advisors is a fiduciary advisor, held to a fiduciary standard of care.

The firm has been registered as an investment advisor in New York State since 2005. The firm and its associates may also register or meet certain exemptions to registration in other states in which we conduct business.

Gigi Turbow Marx owns 100% of the equity in the firm and is the firm's principal and managing member.

Services Provided

Approximately 50% of Old Field Advisors' advisory activity focuses on *financial planning* services, most often involving cash flow and tax management; education planning; and insurance, charitable and estate planning. Another 10-15% of our time is oriented toward furnishing investment advice to clients through periodic *investment consultation*. The balance of the firm's advisory activities involves *investment management* services for clients desiring continuous monitoring, who provide us with discretionary trading authority.

Old Field Advisors, LLC does not provide legal or accounting services. With client consent, we may work with your attorney or accountant to help coordinate and implement agreed upon strategies. These advisers bill you separately for their services and these fees will be in addition to those of our firm.

Should you wish to engage the firm for financial planning or investment advisory services, we will enter into a written engagement agreement specifying the scope of the engagement and the terms under which we provide the services requested.

Workshop Presentations

The firm may provide customized educational workshops on request, for groups desiring general advice on investments and personal finance. Workshops are educational in nature and do not involve the sale of any investment products.

Topics may include issues related to financial planning, diversification of concentrated holdings, hedging portfolio risks with exchange traded options, retirement strategies or other economic and investment topics. Information presented will not be based on any one person's need, nor do we provide individualized investment advice to attendees during general sessions.

Financial Planning Services

Clients may engage the firm to advise them on a wide range of concerns including cash flow analysis, retirement capital needs, education funding, tax strategies, estate planning, charitable giving, and insurance protection needs.

A financial planning project may be as broad-based or as narrowly-focused as you desire. However, clients need to recognize that focusing on narrow areas of interest or need, may result in incomplete analysis.

Financial planning clients should expect to furnish the following types of records and documents for our review:

- Tax returns
- Current financial specifics including W2s or 1099s
- Information on current retirement plans and insurance provided by the client's employer
- Mortgage information
- Insurance policies
- Statements reflecting current investments in your retirement and non-retirement accounts
- Copies of wills and trusts
- Other legal or financial documents pertinent to your planning goals

Following our review, we provide a written summary of the significant observations, assumptions and recommendations in each area we were engaged to provide advice.

Portfolio reviews and broad-based planning engagements generally include the investment advisory service described in the next section.

Financial planning clients retain full discretion over implementation decisions and may accept or reject any recommendation we make. It remains the client's responsibility to notify us if there is any change in your financial situation or investment objectives that affects prior recommendations.

Investment Advisory Services

Clients may also engage the firm for investment advisory services or ongoing investment management services.

Advisory Only – We will review your investment portfolio and suggest changes to improve diversification and reduce risk, consistent with the client's risk *capacity* as well as risk tolerance. Advisory clients generally implement their own trades and manage account activity, but the firm can provide occasional execution support, as needed.

Investment Management - Upon request we will monitor a client's investment portfolio on a continuous basis and execute trades on your behalf under a discretionary investment management agreement (described in Section 13 of this brochure).

The firm's trading discretion is limited by each client's investment policy statement ("IPS"), reflecting your investment objectives, time horizon, risk tolerance, as well as any policy or investment constraints. An IPS is designed to be specific enough to provide ongoing guidance while concurrently ensuring enough flexibility to respond to changing market conditions. Since the IPS is a summary of each client's objectives and preferences it's important that you review and approve the statement.

Portfolios are constructed in accordance with goals identified during your financial planning process and an asset allocation strategy designed with those goals in mind. Holdings allocated to the *Investment Portfolio* are managed with a *minimum investment horizon of three years* unless otherwise specified. If your funds are required within a shorter time frame, they will be invested as *Cash Reserves*, in accordance with your drawdown horizon.

We employ both active and passive investment strategies appropriate for individual investors, as described in further detail in Section 5 of this brochure.

Section 2 Fees and Compensation

Financial Planning Fees

Old Field Advisors offers time based financial planning services, billed at an hourly fee of \$250 per hour. We discuss the services you need and provide you with an estimate of the project cost before entering into a written service agreement. After the initial engagement, many clients use the firm's services on a periodic, as-needed basis. If a client expects to need fairly consistent follow up, we may enter into a retainer arrangement. If a client's needs are sporadic and their account is in good standing, we may agree to bill in arrears. Billable time is accrued in ten minute increments, and a partial increment will be treated as a whole.

The firm requires a deposit for project engagements in the amount of the lesser of \$500 or one-half of the lower-end of the estimated fee range. The balance of fees due are payable immediately upon our presentation of the plan or advice to you or your legal agent.

Investment Management Fees

Annual retainer fees for continuous investment oversight are based on our current hourly billing rate of \$250 per hour times an estimate of the total hours required over the course of the year to service your account. We consider factors such as the complexity of your financial concerns and overall portfolio, the number of individual accounts comprising the portfolio, and similar considerations.

Either you or our firm may request an adjustment to the investment management fee if there is a material change in the assets managed or your needs. Common causes for such a review might include a change in circumstances that require adjustments to your financial plan and the reallocation of assets under our management or significant changes in assets brought into or withdrawn from your portfolio.

Depending upon the size of the portfolio and the complexity of the services to be provided, we may require an initial set up fee of up to one-half the annual investment management fee. Thereafter, fees are billed quarterly in arrears and will be deducted from one or more

managed accounts, in accordance with your preference. Partial periods of service will be pro-rated for the number of days the agreement has been in force.

Investment management clients authorize the firm to deduct its quarterly retainer fee directly from a managed account on the first business day following the quarter billed. Client's account statements will reflect the deduction of the advisory fee. If the account does not contain sufficient funds to pay advisory fees, we will be granted limited authority to sell or redeem securities in sufficient amounts to pay advisory fees. Except in the case of ERISA and IRA accounts, a client may reimburse their account for advisory fees paid to the firm.

The services to be provided and the quarterly retainer are detailed in the written service agreement.

In all instances, you will share responsibility for verifying the accuracy of fee calculations in your invoice and/or statement.

Account Valuation

Old Field Advisors' fees are time based, not determined by assets under management. However, client portfolios are constructed of exchange traded assets, for which pricing data is normally current and available through the custodian for each account.

Other Fees

Old Field Advisors habitually recommends "no-load" (i.e. no commission) investments. In some cases, such as with insurance, there may not be a no-load alternative available. Neither the firm nor our associates are paid a commission if a client chooses to implement those recommendations.

Custodians generally charge transaction fees on purchases or sales of mutual funds and other exchange-traded securities. Each custodian publishes a standardized menu of charges and the advisory firm has no control over those charges.

Expense Ratios Mutual funds as well as exchange traded funds generally charge an annual fee for their services as investment managers, called an expense ratio. These fees are in addition to the fees paid by you to Old Field Advisors, LLC.

An expense ratio of 0.50% means that the mutual fund company charges you one half of one percent of your net asset value, or \$5 per \$1,000, for their services. Performance figures quoted by mutual fund companies reflect returns *after* their fees have been deducted.

Rule 12b-1 fees We generally avoid investments charging "trailer" or SEC Rule 12b-1 fees and do not accept those fees if you choose to purchase such an investment. Fees charged by these issuers are detailed in their prospectuses or product descriptions and you are encouraged to read these documents before investing.

Past Due Accounts

Old Field Advisors, LLC reserves the right to stop work on any account that is more than 30 days overdue. In addition, the firm reserves the right to terminate any financial planning engagement where a client has refused to provide information necessary and appropriate to complete the engagement.

Termination of Services

Either party may terminate an advisory agreement at any time, by notice in writing.

If you are a new client, you may terminate an agreement with our firm within five business days after signing an engagement agreement without penalty. Should you terminate an engagement, you will be invoiced for any time charges incurred by our firm prior to the receipt of your cancellation notice but any unearned amount will be returned to you within 30 days.

Following receipt of a termination notice, the firm will not be responsible for future allocations, transactional services or investment advice. Asset management clients or their legal representatives are responsible for ensuring the transfer of any portfolio, account, or account residual to the receiving service provider.

Section 3 Performance-Based Fees and Side-By-Side Management

Our fees are not based upon a share of capital gains or capital appreciation (growth) of any portion of managed funds, also known as “performance-based fees.”

Performance-based compensation may create an incentive for a firm to recommend investments with a higher degree of risk than is appropriate to a client and Old Field Advisors, LLC avoids such potential conflicts of interest.

Side-by-side management refers to a firm simultaneously managing accounts that do pay performance based fees (such as a hedge fund) and those that do not; this type of arrangement, and the conflict of interest it poses, is also contrary to our firm’s practices.

Section 4 Types of Clients

We provide our services to individual investors, trusts, estates, charitable organizations, and businesses of various scale to assist them in meeting their financial objectives in a cost-effective way.

Our ability to provide our service and advice depends on access to important information. Accordingly, you are expected to provide us with an adequate level of information and supporting documentation throughout the term of the engagement, including but not limited to: source of funds; income levels, your (or your legal agent’s) authority to act on behalf of the account, among other information. This helps us to assess the appropriateness of our financial planning or investment strategy for you and to fulfill our fiduciary responsibilities.

It is important that you keep us up-to-date on significant changes that may call for an update to your financial and investment plans. Events such as job changes, retirement, change in

marital status, or the purchase or sale of a home or business can have a tremendous impact on your circumstances and needs. If we are aware of such events, we can make the adjustments needed to your plan or advice in order to keep you on track toward your goals.

Section 5 Methods of Analysis, Investment Strategies and Risk of Loss

Method of Analysis

If we are engaged to provide investment consultation or investment supervisory services, we will first evaluate several factors, including your:

- Current financial situation;
- Current and long-term needs;
- Investment goals and objectives;
- Level of investment knowledge; and
- Capacity as well as tolerance for risk

We make asset allocation and investment policy decisions based on client specific factors as well as macroeconomic and market conditions. We will then discuss with you how, in our best judgment, to meet your objectives while maintaining a prudent level of risk exposure.

To achieve this, we typically employ a blend of fundamental and technical analyses to develop appropriate financial strategies. Fundamental analysis involves evaluating economic factors including interest rates, the current and projected state of the economy, and expected (future) asset class returns, among others. Technical analysis may involve studying relative valuations for securities, markets or economies. By combining these analyses, the firm believes it may better assist the clients in determining entry and exit strategies to meet their requirements and goals.

Our research and recommendations may be drawn from sources that include financial publications; investment analysis and reporting software; research materials from outside sources; corporate rating services; annual reports, prospectuses and other regulatory filings; and company press releases.

Investment Strategies

The firm's investment approach focuses on *strategic asset allocation*, utilizing a core and satellite approach. We favor passively-managed index and exchange-traded funds as the core investments, and add actively-managed mutual funds when the fund can add risk management value. Individual stock holdings may included as part of the satellite portion of a portfolio.

Diversification, across both domestic and global markets, is the primary strategy the firm employs to manage portfolio volatility. We may also employ exchange traded options to mitigate risk or increase portfolio income as a secondary strategy, when appropriate to market conditions or client needs.

Each client executes an Investment Policy Statement that documents their objectives and their investment preferences. Clients may adjust these objectives over time, as their goals and circumstances evolve.

Investments may include any publicly traded equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment

company securities (variable annuities, and mutual funds shares), U.S. government securities, exchange traded options or futures contracts, and interest in partnerships.

Discount brokers or direct ownership are recommended for the custody of assets and initial public offerings (IPOs) are not available through Old Field Advisors, LLC.

Risk of Loss

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the current of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to met loan obligations may result in bankruptcy and/or a declining market value.

If your preferred investment strategy involves more frequent trading, it may result in additional transactional costs or create taxable events, and in some instances potentially reducing or negating any benefit derived by shorter term investing.

Investment vehicles such as ETFs and indexed funds may be subject to "tracking error risk," defined as a deviation from their stated benchmark (index).

Also, while index funds and ETFs are generally known for tax-efficiency and higher “qualified dividend income” (QDI) percentages, certain asset classes may not offer such benefits, even if held within an index fund or ETF. Short holding periods, currencies and certain commodities (potentially within the fund/ETF) may be considered nonqualified, therefore the investments QDI should be evaluated if tax efficiency is an important aspect of your portfolio.”

Section 6 Disciplinary Information

Neither the firm nor any of its representatives have been involved in any legal or disciplinary events related to past or present investment clients.

Section 7 Other Financial Industry Activities and Affiliations

Old Field Advisors is a member of the Garrett Planning Network (Garrett), a professional membership organization that assists fee-only, financial planning practices. We pay an annual membership fee to the Network for services that include continuing education, as well as compliance and operational support which enhance our ability to provide quality service and advice to the investing public.

The firm has formed an Operating Association with two other members of Garrett who also manage assets for clients, to ensure that qualified personnel are available to back up each client's primary advisor. The other members of the Operating Association are MTP Advisors LLC of Maspeth, NY and Cox Financial Services LLC of Westport, CT. To facilitate that association, Gigi Turbow Marx, Principal of Old Field Advisors, and Elizabeth Cox, Principal of Cox Financial Services have cross registered as Investment Advisor Representatives ("IARs") with MTP Advisors. Under the Operating Association Agreement, each IAR is able to offer wealth management services to their own clients as an IAR of MTP Advisors while clients seeking financial planning and investment advisory services only contract directly with Old Field Advisors, LLC. Some clients may consequently have more than one advisory firm relationship through one advisor.

Each firm will be paid for the services they render to the client and each representative will disclose, in advance of signing a client services agreement,

- the capacity in which they are serving a client;
- which advisory firm agreement the client is executing,
- where their assets are to be custodied, as well as
- any potential or actual conflict of interest the role or service may incur.

Neither the firm nor any associate is affiliated with a bank, FINRA or NFA broker/dealer.

Associates of the firm may hold individual membership or serve on committees or board of professional industry associations such as the National Association of Personal Financial Advisors (NAPFA); Financial Planning Association (FPA), or the Certified Financial Planner Board of Standards, Inc. Generally, participation in any of these entities require membership fees to be paid, adherence to ethical guidelines, as well as in meeting experiential and ongoing educational requirements.

Our policies require the firm and its associates to conduct business activities in a manner that avoid actual or potential conflicts of interest between the firm, its employees and clients, or that may be contrary to law. We provide disclosure to each client prior to and throughout the term of an engagement regarding any conflicts of interest which might reasonably compromise our impartiality or independence.

Section 8 Code of Ethics, Participation or Interest in Client Transactions, Personal Trading

Code of Ethics

All associates of Old Field Advisors, LLC are required to adhere to the Certified Financial Planner Board of Standards Code of Ethics, regardless of whether they are CFP® designees or not. These principles include:

Principle 1 – Integrity Provide professional services with integrity

Integrity demands honesty and candor which must not be subordinated to personal gain and advantage. Associates are placed in positions of trust by clients, and the ultimate source of that trust is the certificant's personal integrity.

Allowance can be made for innocent error and legitimate differences of opinion, but integrity cannot co-exist with deceit or subordination of one's principles.

Principle 2 – Objectivity Provide professional services objectively

Objectivity requires intellectual honesty and impartiality. Regardless of the particular service rendered or the capacity in which a certificant functions, associates should protect the integrity of their work, maintain objectivity and avoid subordination of their judgment.

Principle 3 – Competence Maintain the knowledge and skill necessary to provide professional services competently

Competence means attaining and maintaining an adequate level of knowledge and skill, and application of that knowledge and skill in providing services to clients. Competence also includes the wisdom to recognize the limitations of that knowledge and when consultation with other professionals is appropriate or referral to other professionals necessary.

Associates make a continuing commitment to learning and professional improvement.

Principle 4 – Fairness Be fair and reasonable in all professional relationships. Disclose conflicts of interest.

Fairness requires impartiality, intellectual honesty and disclosure of material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests. Fairness is treating others in the same fashion that you would want to be treated.

Principal 5 – Confidentiality Protect the confidentiality of all client information

Confidentiality means ensuring that information is accessible only to those authorized to have access. A relationship of trust and confidence with the client can only be built upon the understanding that the client's information will remain confidential.

Principle 6 – Professionalism Act in a manner that demonstrates exemplary professional conduct

Professionalism requires behaving with dignity and courtesy to clients, fellow professionals, and others in business-related activities. Associates cooperate with fellow certificants to enhance and maintain the profession's public image and improve the quality of service.

Principle 7 – Diligence Provide professional services diligently

Diligence is the provision of services in a reasonably prompt and thorough manner, including the proper planning for, and supervision of, the rendering of professional services.

Participation or Interest in Client Transactions

Neither our firm, associates or any related person is authorized to recommend to a client, or effect a transaction for a client, involving any security in which our firm or a related person has a material financial interest, including interest as an underwriter, advisor to the issuer, etc.

Associates are prohibited from borrowing from or lending to a client unless the client is an approved financial institution.

Should we act as the advisor to the sponsor of an ERISA-qualified retirement plan (i.e. 401(k) or pension plan) while one of our associates serves in an advisory capacity to one or more of the plan's participants, a potential or implied conflict of interest may occur. We may require the associate to cease in this plan participant advisory capacity or, upon disclosure to and approval from the plan sponsor, allow the dual advisory role to continue with consideration being made to offset fees where appropriate.

Our firm provides a broad range of services to all of our clients, which include financial planning, divorce financial analysis and planning, and investment advisory services where we are paid a fee. The firm's ability to offer one or more of these services to and receive a fee for each type of engagement, creates a potential conflict of interest that may possibly arise. Therefore, you are under no obligation to act upon our recommendations and, if you elect to act on any of our recommendations, you are under no obligation to complete all of them through our firm.

Personal Trading

Our firm and its "related persons" may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client may be

different in nature or in timing from a recommendation made to a different client. At no time, however, will our firm or any related party receive preferential treatment over our clients.

In an effort to reduce or eliminate certain conflicts of interest involving personal trading, our policy may require that we restrict or prohibit associates' transaction in specific reportable securities transactions. Any exception or trading pre-clearance must be approved by the principal of the firm in advance of the transaction in an account. The firm will maintain required personal securities transaction records, per current regulation.

Section 9 – Brokerage Practices

Old Field Advisors, LLC is not affiliated with any bank, custodian, or broker-dealer firm (“service provider”).

When providing *investment advisory* services, we may recommend consolidating accounts with one custodian but the consolidating custodian is selected by the client. If a new relationship is sought, the firm maintain a list of discount brokers from which clients can choose.

When we are engaged to provide *investment management* services, we use Schwab Institutional, optionsXpress or ETrade as our independent custodians.

Section 10 Review of Accounts

Project engagements terminate upon the delivery of the plan or advice unless the client specifically requests investment monitoring on a continuing (retainer) basis.

Accounts are reviewed at least quarterly for retainer clients, by the firm's Principal, Gigi Turbow Marx.

For all other clients, periodic financial check-ups are recommended, but it is the responsibility of the client to initiate such reviews.

Section 11 Client Referrals and Other Compensation

Incoming Referrals

Old Field Advisors, LLC has been fortunate to receive referrals from current clients, estate planning attorneys, accountants, colleagues and similar sources. The firm does not compensate referring parties for those referrals.

Referrals Out

Old Field Advisors provides prospects and clients with referrals to other professionals as requested or appropriate. The firm considers this to be an important component of its fiduciary responsibility and does not accept referral fees or any form of remuneration from other professionals when those situations arise.

Other Compensation

Old Field Advisors, LLC receives no other compensation not previously described in this brochure.

Sections 12 Custody

Account Statements

Old Field Advisors LLC does not take custody of client assets. All client assets are held at qualified third party custodians, which means the custodians provide account statements directly to clients at their address of record, at least quarterly.

Section 13 Investment Discretion

Discretionary Authority for Trading

Old Field Advisors, LLC develops a strategic portfolio target in consultation with each client that reflects their financial goals and cash flow requirements. Once the target portfolio has been agreed upon, clients provide the firm with the discretion to implement it. Such discretion is bounded by the client's Investment Policy Statement.

Limited Power of Attorney

Occasionally a client may request Old Field Advisors LLC speak directly to one of their financial service providers or would like to give Old Field Advisors LLC “view only” ability on an account. A limited power of attorney is an authorization for this purpose. A client signs a limited power of attorney so that we may speak with a provider or view account information. No authority is given to make changes.

Section 14 Voting Client Securities

Proxy Votes

Old Field Advisors, LLC does not vote proxies on securities. Clients are expected to vote their own proxies.

When assistance on voting proxies is sought, Old Field Advisors, LLC may advise clients as requested. In the unlikely event that a conflict of interest exists, it will be disclosed to the Client as timely as practicable.

Section 15 Financial Information

Privacy Policy

Old Field Advisors, LLC, respects the personal financial privacy of all past, present and prospective clients. We recognize that they have entrusted us with personal financial information, and it is important all employees and client of our firm know our policy concerning what we do with that information

We collect personal financial information about our clients from the following sources:

- Information our clients provide to us to complete their financial plan or investment recommendation;

- Information our clients provide to us in agreements, account applications, and other documents completed in connection with the opening and maintenance of their accounts;
- Information our clients provide to us orally; and
- Information we may receive from third parties, such as custodians, about client transaction.

We do not disclose nonpublic personal financial information about our clients to anyone, **except:**

- When required to provide services our clients have requested;
- When our client have specifically authorized us to do so;
- When required during the course of a firm assessment (i.e., independent audit); or
- When permitted or required by law (i.e., periodic regulatory examination).

Within our company, we restrict access to client information to those associates who need it to complete their work. To ensure security and confidentiality, we maintain physical, electronic, and procedural safeguards to protect the privacy of our clients. In addition, all employees, sub-contractors and officers sign contracts binding them to handle all client material as private and confidential. Nothing about our clients is to be discussed outside our offices with family, friends or other clients. Within the office, employees or associates only discuss what is needed to complete the task.

Most importantly , they are instructed to not discuss a client's situation with anyone else requesting information about an account unless specifically authorized, in writing, to do so. This includes, for example, providing information to a husband on his wife's IRA account; son or daughter about their mom or dad's accounts, etc.

Clients are notified annually of our privacy policy in addition to any time our policy is expected to change.

Part 2B: Advisory Personnel Information

Gigi Turbow Marx, Principal [Born 1952]

B.A. Economics, University of Michigan, 1975

M.B.A. Finance, Columbia University Graduate School of Business, 1981

Ms. Turbow Marx has worked in the capital markets for over thirty years, with corporate clients and institutional investors as well as individuals. Her prior assignments have included international financial management and currency consulting for corporate clients of Bank of America and Citicorp; investment banking in public (municipal) finance for the former Dean Witter Reynolds (now Morgan Stanley) and Paine Webber (subsequently acquired by UBS); as well as engagements as Director of Investor Relations for two NYSE listed companies. Prior to founding Old Field Advisors, LLC, she also traded options for proprietary trading entity, g2 Derivatives. She has extensive personal experience with executive benefits, estate planning and divorce financial planning.

Ms. Turbow Marx previously held the Series 7 and 63 registrations and has successfully completed the Series 65 examination for investment advisors. She is the founding principal of Old Field Advisors, LLC, a registered investment advisor.

Affiliated Advisors

As noted in Section 7, Old Field Advisors is a member of a professional network known as the Garrett Planning Network and may partner with other members of that network to provide specialized expertise to the firm's clients as appropriate.

The firm has entered into a formal Operating Association with two other members of the Garrett Planning Network who also manage assets for clients, to ensure that qualified personnel are available to back up each client's primary advisor. Gigi Turbow Marx has registered as an Investment Advisor Representative with MTP Advisors, in addition to her registration under Old Field Advisors, in order to facilitate that association.

The other members of the Operating Association are:

Elizabeth Cox [Born 1962]

Educational Background

Middlebury College; BA American Literature (1984)

Columbia University (SIPA); MIA, International Finance (1989)

Certified Divorce Financial Analyst™ (CDFA®)

CERTIFIED FINANCIAL PLANNER™ Practitioner (CFP®)

Enrolled Agent (EA)

Business Experience

MTP Advisors; Maspeth, NY - Investment Advisor Representative (2010-Present)
Cox Financial Services, LLC; Westport, CT - Principal (2009-Present)
Raymond James Financial Services, LLC; Wilton, CT (2006-2009)
Bloomberg Tradebook; Connecticut, NY - Sales (1999-2000)
Deutsche Bank Securities; Connecticut, NY - Director, International Sales-Trading (1996-1999)
ING Baring Securities; Connecticut, NY - Senior Vice President, Latin American Sales-Trading (1992-1996)

and

Richard Michael Terry [Born 1949]

Educational Background

Memphis State University - BA, English Literature(1971); Bachelor of Music (1977)
Master of Music (1979)
New York University - MBA Finance/CAIS (1987)
CERTIFIED FINANCIAL PLANNER™ Practitioner (CFP®)

Business Experience

MTP Advisors; Maspeth, NY - President (2006 - Present)
Financial Asset Management; New York, NY - Financial Planner (1998 - 2006)

As described above, Ms. Turbow Marx may provide wealth management services to certain clients through her association with MTP Advisors. Clients and prospective clients are provided current disclosure documents and are apprised of any known or potential conflicts of interest these engagements may incur. Wealth management clients may have a contractual relationship with both Old Field Advisors and MTP Advisors.

Supervision

Ms Turbow Marx serves in multiple capacities with the firm including Managing Member, Firm Principal, Data Security Officer and Investment Adviser Representative. The firm recognizes that not having all organizational duties segregated may potentially create a conflict of interest; however, the firm employs policies and procedures to ensure timely, accurate record keeping and supervision. Certain functions may be outsourced to assist in these efforts when or as necessary. Questions relative to the firm, staff, its services, or this ADV Part 2 may be made to the attention of Ms Turbow Marx at (631) 751-7230.

Additional information about the firm, other advisory firms, or associated investment adviser representatives is available on the Internet at www.adviserinfo.sec.gov. A search of this site for firms or their associated personnel can be accomplished by name or a unique firm identifier, known as an IARD number. The **IARD number** for Old Field Advisors LLC is **134519**.