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October 26, 2026

Form ADV Part 2A
Brochure

This brochure provides information about the qualifications and business practices of Third Eye Associates, Ltd. If you have any questions about the contents of this Brochure, please contact us at (845) 752-2216 and/or bjones@thirdeyeassociates.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Third Eye Associates, Ltd. is also available on the SEC's website at www.adviserinfo.sec.gov. The searchable IARD/CRD number for Third Eye Associates, Ltd. is 149627.

Any references to Third Eye Associates, Ltd. as a registered investment adviser or its related persons as registered Advisory Representatives does not imply a certain level of skill or training.

Item 2 Material Changes

When we amend the Third Eye Associates, Ltd. (TEA) brochure for the annual update and it contains material changes from our last annual update, we will provide you with a summary of such changes. We will discuss only specific material changes that have been made to the brochure since the last annual update of the brochure and we will reference the date of the last annual update to this brochure.

Since our last annual updating amendment dated March 03, 2026, the material changes are described below.

- Third Eye Associates, Ltd. has added the 2B of Jill Marjorie Schum in the firm's brochure.
- Third Eye Associates, Ltd. has removed Rebecca Elisabeth Brown's 2B.
- Third Eye Associates, Ltd. has updated their financial planning fees.
- Third Eye Associates, Ltd. has added Charles Schwab & Co., Inc. Advisor Services as a custodian.
- Third Eye Associates, Ltd. has updated their firm ownership.

A copy of our updated brochure and brochure supplements is available to you free of charge. You may request a copy by contacting us at (845) 752-2216 and/or bjones@thirdeyeassociates.com.

Additional information about Third Eye Associates, Ltd. is also available via the SEC's web site www.adviserinfo.sec.gov. The IARD number for Third Eye Associates, Ltd. is 149627. The SEC's web site also provides information about any persons affiliated with Third Eye Associates, Ltd. who are registered, or are required to be registered, as Advisory Representatives of Third Eye Associates, Ltd.

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Item 4 Advisory Business

Third Eye Associates, Ltd. (hereinafter referred to as "TEA") is an investment advisory firm offering financial life planning services customized to your individual needs. When appropriate, we will refer clients to various third-party money managers for asset management services.

A. TEA, a corporation, was established in 2005 and filed for investment adviser registration with the State of New York in March 2009. The owners of the Firm are Elizabeth Jones, RLP®, AIF®, CeFT®, CRD No. 3190846, who serves as President, Chief Compliance Officer, and Advisory Representative and has been in the financial services industry since 1999, and Robert Alonso, CRD No. 7182718, who serves as Vice President, Secretary, and Director of Investments and has been in the financial services industry since 2019. Additional information about the Advisory Representatives is provided in the Supplemental Brochures attached to this Brochure.

B. TEA offers the following advisory services, with each service more fully described below:
    - Financial Planning Services
    - Third-party Management Services

Financial Planning Services
TEA provides financial planning services based on your financial and tax status, age, risk tolerance and investment objectives. Depending upon your needs, our advice may include topics such as:

- Goals and values-based financial planning
- Retirement analysis and planning
- Wealth management
- Risk analysis and insurance planning
- Tax planning analysis strategies in partnership with your CPA
- Long-term care analysis
- Education funding strategies
- Estate planning analysis in partnership with your estate planning attorney
- Cash flow and debt analysis
- Legacy planning
- Benefits and retirement plan customization for professional and small businesses

Our services may be broad or may be focused on one or more topics to address your unique situation.

The financial planning process will begin with an initial complimentary consultation to assess if we can help you with your specific needs. If you decide to engage us for services, you will be required to sign our advisory agreement outlining the relationship and specifying our fee.

Planning services are based on your financial situation at the time and on financial information disclosed by you to TEA. You need to be aware that certain assumptions may be made with respect to interest and inflation rates and use of past trends and performance of the market and economy. However, past performance is in no way an indication of future performance. TEA cannot offer any guarantees or promises that your financial goals and objectives will be met. Further, together, we must continue to review the plan and update it based upon changes in your financial situation, goals, or objectives or changes in the economy. If your financial situation or investment goals or objectives change, you must notify us promptly of the changes. The advice offered by TEA is limited and you are

advised to seek the services of other professionals such as an insurance adviser, attorney and/or accountant.

The financial plan recommendations made by Advisory Representatives are not limited to any particular type of investment; however, our investment recommendations primarily include mutual funds, stocks, bonds, certificates of deposits, government securities, exchange traded funds (ETFs), money markets, annuities, and REITs, as appropriate. We may also give advice on investments on 529 plans, or other investments not listed.

You are not obligated to implement advice through TEA or its Advisory Representatives.

Third-party Management Services
We will gather information regarding your investment objectives, goals, time horizon and risk tolerance to assess your suitability for this service. Based on our analysis of your situation, and if appropriate, we will refer you to a third-party management service.

TEA will access the due diligence and research of third-party institutional money managers that have a proven track record and expertise in various asset classes. We will meet with these money managers on a quarterly basis and monitor their results in a variety of markets.

Currently, we have a relationship with AssetMark, Inc. ("AssetMark,") who provides asset management services. TEA and AssetMark are not affiliated.

From time to time, we may offer the services of other Third-party Managers. The Third-party Manager must be appropriately licensed as an Investment Adviser with the U.S. Securities and Exchange Commission or states in which they conduct business.

TEA's Advisory Representatives will help you complete the documents in order to use the services of the Third-party Manager. We will assist you in monitoring your account with the third-party Manager and act as a communication conduit between you and the Third-Party Manager. Periodically, we will review reports provided to you. Additionally, we will contact you at least annually to review your financial situation and objectives; reassess the money managers and your continued suitability for the service; communicate information to the Third-party Adviser managing the account as warranted; and assist you in understanding and evaluating the services provided by the Manager. You are expected to notify us of any changes in your financial situation, investment objectives, or account restrictions.

TEA will not directly conduct any securities transactions on your behalf or participate directly in the selection of the securities to be purchased or sold for your account. The Third-party Manager will make investment decisions according to the agreement between you and the Manager. The Third-party Manager will charge you advisory fees according to their fee schedule as disclosed in the Manager's disclosure brochure. Please refer to Item 5, Fees, and Compensation, for further information regarding the Third-party Managers.

C. We tailor the advisory services we offer to your individual needs. You may impose restrictions and/or limitations on investing in certain securities or types of securities. Your specific information is obtained during our in-person interviews. The information gathered by TEA will assist the firm in providing you with the requested services and customize the services to your financial situation. Depending on the services you have requested, we will gather various financial information and

history from you including, but not limited to:

- Retirement and Financial Goals
- Investment objectives
- Investment horizon
- Existing portfolio statements, including retirement account information
- Financial needs
- Tax bracket information
- Cash flow analysis
- Cost of living needs
- Savings tendencies
- Communication style preferences
- Other applicable financial information required by our Advisory Representative in order to provide the investment advisory services you have requested.

With most clients, there will be more than one meeting with possibly as many as 5-6 meetings, depending on the scope of the engagement and the number of iterations of a plan. Generally, all recommendations will be made and discussed with you during our meetings.

Our data gathering process includes Kinder Institute Life Planning tools such as Heart's Core Grid, Vision for Life and Obstacles List. We use Financial Transitionist Institute tools such as Discovery Questions, Communication Preferences, Money Autobiography, Purpose-Method-Outcome, Reinvention Workbook and One-Page Protocols to help explain complex financial concepts. We also use an in-depth risk tolerance questionnaire coupled with extensive conversations regarding market movement to be expected for different target allocations and timeline of goals to be achieved on behalf of client.

We will spend about 10 hours in our discovery process with you to understand your motivations, desires, values and goals. Your financial plan will be generated in partnership with you to include these important aspects. We will coach you through the implementation of the plan, monitor the progress, and interact with your accountant and attorney, as warranted.

D. TEA does not participate in wrap fee programs by providing portfolio management services or through its offering of AssetMark, Inc. or another third-party manager.

E. TEA does not provide asset management services and, therefore, we do not have any discretionary or non-discretionary assets under our management. We will refer suitable clients in need of asset management services to a Third-Party Manager with whom we have a relationship.

General Information

The investment recommendations and advice offered by TEA and your Advisory Representative are not legal advice or accounting advice. You should coordinate and discuss the impact of financial advice with your attorney and/or accountant. Our primary goal is to help our clients identify and pursue their financial goals, thereby enhancing the overall quality of their lives.

IRA Rollover Recommendations
Effective December 20, 2021 (or such later date as the US Department of Labor ("DOL") Field Assistance Bulletin 2018-02 ceases to be in effect), for purposes of complying with the DOL's Prohibited Transaction Exemption 2020-02 ("PTE 2020-02") where applicable, we are providing the following acknowledgment to you. 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.

IRA Rollover Considerations
As part of our financial planning and advisory services, we provide you with recommendations and advice concerning your employer retirement plan or other qualified retirement account. When appropriate, we recommend that you withdraw the assets from your employer's retirement plan or other qualified retirement account and roll the assets over to an individual retirement account ("IRA") to be managed by a Third-Party Manager that we recommend. If you elect to roll the assets to an IRA under our Third-Party Managed Program, we will charge you an asset-based fee as described in Item 5. This practice presents a conflict of interest because our investment advisory representatives have an incentive to recommend a rollover to you for the purpose of generating fee-based compensation rather than solely based on your needs. You are under no obligation, contractually or otherwise, to complete the rollover. Furthermore, if you do complete the rollover, you are under no obligation to have your IRA assets managed under our Third-Party Managed Program. You have the right to decide whether or not to complete the rollover and the right to consult with other financial professionals.

Some employers permit former employees to keep their retirement assets in their company plan. Also, current employees can sometimes move assets out of their company plan before they retire or change jobs. In determining whether to complete the rollover to an IRA, and to the extent the following options are available, you should consider the costs and benefits of each.

An employee will typically have four options:
1. Leave the funds in your employer's (former employer's) plan.
2. Roll over the funds to a new employer's retirement plan.
3. Cash out and take a taxable distribution from the plan.
4. Roll the funds into an IRA rollover account.

Each of these options has advantages and disadvantages. Before making a change, we encourage you to speak with your financial advisor, CPA, and/or tax attorney.

Before rolling over your retirement funds to an IRA under our Third-Party Managed Program, carefully consider the following. NOTE: This list is not exhaustive.

1. Determine whether the investment options in your employer's retirement plan address your needs or whether other types of investments are needed.
    a. Employer retirement plans generally have a more limited investment menu than IRAs.
    b. Employer retirement plans may have unique investment options not available to the public, such as employer securities or previously closed funds.
2. Your current plan may have lower fees than our fee and the Third-Party Manager's fee combined.
    a. If you are interested in investing only in mutual funds, you should understand the cost structure of the share classes available in your employer's retirement plan and how the costs of those share classes compare with those available in an IRA.
    b. You should understand the various products and services available through an IRA provider and their costs.
    c. It is likely you will not be charged a management fee and will not receive ongoing asset management services unless you elect to have such services. If your plan offers management services, the fee associated with the service may be more or less than our fee and the Third-Party Manager's fee combined.
3. The Third-Party Manager's strategy may have higher risk than the options provided to you in your plan.
4. Your current plan may offer financial advice, guidance, management, and/or portfolio options at no additional cost.
5. If you keep your assets titled in a 401(k) or retirement account, you could potentially delay your required minimum distribution beyond age 72.
6. Your 401(k) may offer more liability protection than a rollover IRA; each state may vary. Generally, Federal law protects assets in qualified plans from creditors. Since 2005, IRA assets have been generally protected from creditors in bankruptcies; however, there can be exceptions. Consult an attorney if you are concerned about protecting your retirement plan assets from creditors.
7. You may be able to take out a loan on your 401(k), but not from an IRA.
8. IRA assets can be accessed any time; however, distributions are subject to ordinary income tax and may also be subject to a 10% early distribution penalty unless they qualify for an exception such as disability, higher education expenses, or a home purchase.
9. If you own company stock in your plan, you may be able to liquidate those shares at a lower capital gains tax rate.
10. Your plan may allow you to hire another firm as the manager and keep the assets titled in the plan name.

It is important that you understand your options, their features and their differences, and decide whether a rollover is best for you. If you have questions, contact us at our main number listed on the cover page of this brochure.

Item 5 Fees and Compensation

Financial Planning Services

Fees for planning services are strictly for planning services. Therefore, you may pay fees for additional services obtained such as asset management or commissions products purchased such as securities or insurance.

TEA offers advisory services on both a fixed retainer fee and hourly fee basis. Fees are not deducted

from client assets. We will bill you for our financial planning services. Our fees are negotiable and are charged in accordance with the fee schedule below. Lower fees for comparable services may be available from other sources.

Hourly fee: $350 per hour, payable upon completion of project or at the end of each month (or other agreed upon time) as invoiced by TEA.

Financial Life Planning fees are based on your financial situation and the expected complexity of the overall life and wealth needs. Six-month, fixed retainer fees are generally payable with one half (1/2) due upon execution of the advisory agreement. The two remaining one-quarter (1/4) payments are due upon your receipt of our invoice, within a 3-month interval. The final invoice is due within six (6) months of signing the agreement and upon completion of the financial life plan.

TEA has created the following retainer fixed fee programs:
Financial Life Planning Programs

Business Owners— $7,500+ six-month rate (24+ hrs)
8 - 2-hour sessions w/Planner
4 hours Consulting sessions
1 Financial Plan (4 hrs)

Couples— $6,000+ six-month rate (20+ hrs)
8 - 2-hour sessions w/Planner
4 hours Consulting sessions
1 Financial Plan (4 hrs)

Standard— $5,000+ six-month rate (17.5+ hrs)
7 - 90 min sessions w/Planner
3 hours Consulting sessions
1 Financial Plan (4 hrs)

Maintenance— $3,500+ annual rate (10+ hrs)
10+ hours Planning/Consulting

Transition Planning
$8,800+ annual rate: Generally, payable quarterly in advance.

Termination Provisions
You may terminate our advisory services, without penalty, upon written notice within five (5) business days after entering into the advisory agreement with TEA. For clients that retain TEA for a "one-time" consultation, the agreement shall terminate upon the later of (a) payment of the full fee by client; or (b) the completion of services by the Advisory Representative. For clients that retain TEA for services as needed, or for continual and ongoing services, you may terminate investment advisory services upon our receipt of your written notice to terminate. You will be responsible for any time spent by TEA in providing advisory services or analyzing your situation. Any unpaid fees that have been earned by TEA will be paid within fifteen (15) days of the termination of the agreement. You will receive a pro-rata refund of any pre-paid advisory fees for planning services at any time up to presentation of your financial plan. Refunds will not be provided for work that has already been performed.

Third-party Management Services
When appropriate, we will recommend the services of AssetMark, Inc. ("AssetMark") or other third-party manager with which TEA has an agreement.

TEA's advisory fee is based on a percentage of the assets under the Third-party Manager's management. The fee will vary based on the amount of aggregated assets for each household under the Third-party Manager's management and the management style selected (active versus passive management).

Your total fee will be comprised of TEA's fee ranging from 0.5 % to 1.20% and the Third-party Manager's fee ranging from 0% to 1.05%. Client advisory fees will not be increased as a result of compensation being separately charged by both TEA and the Third-party Manager. Clients will not be charged a total management fee over 2%.

Our tiered fee schedule appears below.

TEA's Fee Schedule

Account Size	**Maximum Annual Fee**
First $250,000	1.20%
Next $250,000	1.05%
Next $500,000	0.85%
Next $1,000,000	0.65%
Over $2,000,000	0.50%

Fees are negotiable and are not based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds. Fees are payable monthly or quarterly, in advance, based upon the market value of the assets held in your account at the end of the preceding calendar month or quarter. Your account fee will be debited each month or quarter from your account, or deducted from your checking account, by AssetMark or Schwab who will provide you with an account statement reflecting the deduction of the advisory fee.

You may pay additional fees such as custodial and termination fees. For complete information regarding the fees and services rendered, please refer to TEA's advisory agreement in concert with the Disclosure Brochure and agreement for the Third-Party Manager.

The Third-Party Manager must be appropriately licensed as an Investment Adviser with the SEC or states in which they conduct business.

Termination Provisions
You may terminate investment advisory services obtained from TEA, without fee or penalty, upon written notice within five (5) business days after entering into the advisory agreement with TEA. You will be responsible for any fees and charges incurred from third parties as a result of maintaining the account such as transaction fees for any securities transactions executed and account maintenance or custodial fees. Thereafter, you may terminate investment advisory services in accordance with the Third-Party Manager's termination policy. TEA will refund to you, for any reason, any prepaid unearned fees that we receive. Refunds will not be provided for work that has already been performed.

Neither TEA nor any of its supervised persons accepts compensation for the sale of securities or other

investment products, including asset-based sales charges or service fees from the sale of mutual funds.

Item 6 Performance-Based Fees and Side by Side Management

TEA does not charge performance-based fees or participate in side-by-side management.

Item 7 Types of Clients

The financial planning services offered by TEA are geared toward individuals and their families including affluent and high net worth individuals.

Although TEA does not have any requirements for opening or maintaining an account, the Third-party Managers to which TEA may refer clients may impose account minimums in order to obtain their services. You should refer to the Third-Party Manager's disclosure documents for further information.

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

A. We refer clients to third-party investment advisers, also referred to as third-party money managers. Our analysis of third-party managers involves examining the experience, expertise, investment philosophies, and past performance of the managers to determine if that manager has demonstrated an ability to invest over a period of time and in different economic conditions. A risk of investing with a third-party manager who has been successful in the past is that the success may not be able to be replicated in the future. In addition, as we do not control the underlying investments in a third-party manager's portfolio, there is a risk that a manager may deviate from the stated investment mandate or strategy of the portfolio, making it a less suitable investment for our clients. Moreover, as we do not control the manager's daily business and compliance operations, we may be unaware of the lack of internal controls necessary to prevent business, regulatory or reputational deficiencies.

   TEA conducts economic analysis and attempts to analyze and determine economic trends. Additionally, TEA conducts fundamental analysis. Fundamental analysis generally involves assessing a company's or security's value based on factors such as sales, assets, markets, management, products and services, earnings, and financial structure. Other security analysis methods may include charting, technical and cyclical analysis.

   When using Fundamental Analysis, we generally rely on, among other things, company earnings, balance sheet variables and management quality which are used to predict the future value of an investment. Data we review is generally considered reliable but we cannot guarantee nor have we verified its accuracy. In addition, the data that we review is sometimes subjective in nature and open to interpretation. Even if our data and interpretation of the data is correct, there may be other factors that determine the value of securities other than those considered in Fundamental Analysis.

B. When using technical analysis, we review statistics to determine trends in security prices and make our investment decisions based on those trends. This analysis may only be able to predict how an investment will perform short-term. In addition, this analysis does not take into account, the more fundamental properties of what an investment may be worth such as company performance and balance sheet variables which may play a part in determining the value of an investment.

   Investing in securities involves risk of loss that clients should be prepared to bear. The risk of loss from investing in securities includes the potential loss of the principal money you are investing.

Therefore, your participation in any of the investment programs recommended by TEA requires you to be prepared to bear the risk of loss as well as the fluctuating performance of your accounts.

Market values of investments will always fluctuate based on market conditions.

We do not represent, warrantee or imply that the services or methods of analysis we use can or will predict future results, successfully identify market tops or bottoms or insulate you from losses due to major market corrections or crashes. Past performance is no indication of future performance. No guarantees can be offered that your goals or objectives will be achieved. Further, no promises or assumptions can be made that the advisory services offered by TEA or our Advisory Representatives will provide a better return than other investment strategies.

C. As stated above in Item 5, financial planning advice may include the recommendation of mutual funds and ETFs to meet a client's planning objectives for diversification. The risks with mutual funds include the costs and expenses within the fund that can impact performance, change of managers and/or the fund straying from its stated investment objective. Open-ended mutual funds do not typically have a liquidity issue and the price does not fluctuate throughout the trading day. Mutual fund fees are described in the fund's prospectus, which the custodian mails directly to the client following any purchase of a mutual fund that is new to the client's account. In addition, a prospectus is available online at each mutual fund company's Web site. At the client's request, TEA will direct the client to the appropriate Web page to access the prospectus.

   The risks with ETFs include the fact that actively traded ETFs can create increased trading expenses and fees and the intraday trading opportunities created by ETFs may not fit into a long-term investor's strategy. In addition, an ETF more heavily weighted towards a particular market sector may be more volatile over short and long periods of time than a more broadly diversified ETF.

Item 9 Disciplinary Information

Registered Investment Advisers must disclose any legal or disciplinary events that would be material to your evaluation of TEA or the integrity of our management. While TEA does not feel it is a material event, the California Department of Financial Protection and Innovation requires us to provide you with information regarding the 4-month FINRA suspension of the two owners, at the time, of TEA, Elizabeth Jones and Susan Simon, that occurred more than ten years ago. This was an employment related event. No clients were involved. The event was, and continues to be, fully disclosed on ADV Part 1A, Item 11. [Note: Susan Simon retired from her role as an Investment Adviser Representative in 2021. Susan no longer is owner of TEA] Based on our attorney's recommendation, the incident was not previously disclosed here since it is disclosed elsewhere and we do not feel that this non-client, employment matter would be material to your evaluation of TEA or the integrity of our management. Please let us know if you have any questions or would like to discuss further.

In December 2024 Vermont penalized the firm for not registering a remote adviser of the firm who lived in Vermont and transacted business as an Investment Adviser. An administrative fine was paid to resolve the violation. No clients were involved.

Item 10 Other Financial Industry Activities and Affiliations

A. TEA nor any of our management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer, a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities. TEA does not have a related person who is a: broker/dealer or other similar type of broker or dealer; investment company or other pooled investment vehicle, other investment adviser or financial planner; futures commission merchant or commodity pool operator; banking or thrift institution; accountant or accounting firm; lawyer or law firm; insurance company or agency; pension consultant; real estate broker or dealer; or sponsor or syndicator of a limited partnership.

B. Certain employees are licensed insurance agents. The insurance business represents a small part of our total activities and we do not concentrate resources in this area. However, the insurance agents will earn commissions if you purchase insurance products through them in their role as insurance agents. This creates a conflict of interest. You are under no obligation to purchase insurance products or services through these insurance agents. Clients have the right to decide whether or not to purchase insurance products and which insurance professionals to use. Insurance products will not be offered to clients unless the insurance agent(s) is appropriately licensed to sell insurance products in the applicable jurisdiction.

   TEA attempts to mitigate conflicts of interest by notifying you of these conflicts. We inform you that you are free to consult other financial professionals and that you may implement recommendations through these professionals. We are bound by our Code of Ethics to act in an ethical manner.

   TEA and its Advisory Representatives are not actively engaged in any other financial industry entity.

C. As noted in Item 4, TEA recommends the services of a Third-party Manager. Fees for such programs may be higher or lower than if you directly obtained the services of the third-party manager or if you obtained advisory services separately.

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

Code of Ethics

A. TEA has a fiduciary duty to you to act in your best interest and always place your interests first and foremost. TEA takes seriously its compliance and regulatory obligations and requires all staff to comply with such rules and regulations as well as our policies and procedures. Further, we strive to handle your non-public information in such a way to protect information from falling into the hands of anyone who has no business reason to know such information. We provide you with our Privacy Policy which details our procedures for handling your personal information. TEA maintains a code of ethics for its Advisory Representatives, supervised persons and office staff. The Code of Ethics contains provisions for standards of business conduct in order to comply with federal securities laws, personal securities reporting requirements, pre-approval procedures for certain transactions, code violations reporting requirements, and safeguarding of material non-public information about

your transactions. Further, our Code of Ethics establishes our firm's expectation for business conduct.

We adhere to the Financial Planning Association's (FPA) Code of Ethics. This Code of Ethics is an expression of the financial planning profession's recognition of its responsibilities to the public, to clients, to colleagues, and to employers. The stated principles apply to all FPA members and provide guidance to them in the performance of their professional services. A copy of our Code of Ethics will be provided to you upon request.

B. Neither TEA nor its associated persons recommend to clients or buys or sells for client accounts any securities in which we have a material financial interest.

C. TEA and its associated persons do not buy or sell securities identical to those securities recommended to you.

D. TEA is required to maintain a list of all securities holdings for its associated persons and develop procedures to supervise the trading activities of associated persons who have knowledge of your transactions and their related family accounts at least quarterly. Further, associated persons are prohibited from trading on non-public information or sharing such information.

You have the right to decline any investment recommendation. TEA and its associated persons are required to conduct their securities and investment advisory business in accordance with all applicable Federal and State securities regulations.

Item 12 Brokerage Practices

A. TEA is not associated with any broker-dealer firm; therefore, you may choose any broker-dealer and establish an account. However, if asked for a recommendation, we will suggest the client establish an account with a low-cost on-line provider that offers no-load or low-load products. Recommendations are based on individual client needs, availability of investment products, level of service, and brokerage fees and commissions.

TEA recommends to clients the following broker-dealers and/or custodians: AssetMark or Charles Schwab & Co., Inc. Advisor Services for Third-party Management Services and, if asked, any low-cost on-line provider of your choosing.

Elizabeth Jones and Robert Alonso are provided with the opportunity to attend training or education conferences through AssetMark that include the payment or reimbursement of travel and meal expenses for attendees. Payment/reimbursement of expenses is not contingent upon sales targets or contests, but rather on total assets managed on the AssetMark platform. This creates conflicts of interest as it provides an incentive to recommend Third-Party Management programs that provide the above referenced opportunities over those that do not. To mitigate the conflict of interest, this disclosure has been provided to you. You have the right to decide whether or not to engage our services and you are free to consult other financial professionals. Elizabeth Jones and Robert Alonso bound by a Code of Ethics and fiduciary duty to act in an ethical manner and place your interests first and foremost.

Neither TEA nor a related person receives client referrals from a broker-dealer or third-party.

B. TEA does not directly manage assets and is not involved in trade execution. Therefore, order aggregation of securities for client accounts is not applicable.

Item 13 Review of Accounts

A. Upon completion of your written financial plan, Advisory Representatives will meet with you to review the plan and answer any questions you may have about the plan's content. After this consultation, there are no further reviews unless requested. If you request additional reviews beyond the anniversary of the agreement, you will be required to execute a new advisory agreement. If you are participating in the third-party Management Services, we will review your account quarterly and meet with you, at a minimum, on an annual basis. Generally, smaller accounts require annual meetings while larger, more complex portfolios require bi-annual or quarterly meetings. More frequent reviews may be triggered by material changes in variables such as the client's individual circumstances, or the market, political, or economic environment. Elizabeth Jones, President/CCO, and Robert Alonso, Advisory Representative, conduct all reviews.

B. You must notify your Advisory Representative promptly of any changes to your financial goals, objectives or financial situation as such changes may require your Advisory Representative to review your plan and make amendments.

C. For financial planning services, other than the initial plan or analysis, there will be no other written reports issued. Generally, all recommendations will be made and discussed with you during our meetings.

For third-party manager services, the account custodian will provide you with monthly or quarterly statements and confirmations of all transactions in your account. In addition, the Third-party Manager will provide you with a quarterly performance report. TEA does not provide any written reports to clients.

Item 14 Client Referrals and Other Compensation

A. Product vendors recommended by TEA provide monetary and non-monetary assistance with client events, provide educational tools and resources. We do not select products as a result of any monetary or non-monetary assistance. The selection of product that is most appropriate for the client is first and foremost. TEA's due diligence of a product does not take into consideration any assistance it receives. While the receipt of products or services is a benefit for you and us, it also presents a conflict of interest.

Additionally, Advisory Representatives are provided with the opportunity to attend training or education conferences through AssetMark. Such conferences include the payment or reimbursement of travel and meal expenses for attendees. Payment/reimbursement of expenses is not contingent upon sales targets or contests, but rather on total assets managed on the AssetMark platform. This creates conflicts of interest as it provides an incentive to recommend Third-Party Management programs that provide us with the above referenced opportunities over those that do not.

Charles Schwab & Co., Inc. Advisor Services provides TEA with access to Charles Schwab & Co., Inc. Advisor Services' institutional trading and custody services, which are typically not available to Charles Schwab & Co., Inc. Advisor Services retail investors. These services

generally are available to independent investment advisers on an unsolicited basis, at no charge to them so long as a total of at least $10 million of the adviser's clients' assets are maintained in accounts at Charles Schwab & Co., Inc. Advisor Services. Charles Schwab & Co., Inc. Advisor Services includes brokerage services that are related to the execution of securities transactions, custody, research, including that in the form of advice, analyses and reports, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. For TEA client accounts maintained in its custody, Charles Schwab & Co., Inc. Advisor Services generally does not charge separately for custody services but is compensated by account holders through commissions or other transaction-related or asset-based fees for securities trades that are executed through Charles Schwab & Co., Inc. Advisor Services or that settle into Charles Schwab & Co., Inc. Advisor Services accounts.

Charles Schwab & Co., Inc. Advisor Services also makes available to TEA other products and services that benefit TEA but may not benefit its clients' accounts. These benefits may include national, regional or TEA specific educational events organized and/or sponsored by Charles Schwab & Co., Inc. Advisor Services. Other potential benefits may include occasional business entertainment of personnel of TEA by Charles Schwab & Co., Inc. Advisor Services personnel, including meals, invitations to sporting events, including golf tournaments, and other forms of entertainment, some of which may accompany educational opportunities. Other of these products and services assist TEA in managing and administering clients' accounts. These include software and other technology (and related technological training) that provide access to client account data (such as trade confirmations and account statements), facilitate trade execution (and allocation of aggregated trade orders for multiple client accounts, if applicable), provide research, pricing information and other market data, facilitate payment of TEA's fees from its clients' accounts (if applicable), and assist with back-office training and support functions, recordkeeping and client reporting. Many of these services generally may be used to service all or some substantial number of TEA's accounts. Charles Schwab & Co., Inc. Advisor Services also makes available to TEA other services intended to help TEA manage and further develop its business enterprise. These services may include professional compliance, legal and business consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, employee benefits providers, and human capital consultants, insurance and marketing. In addition, Charles Schwab & Co., Inc. Advisor Services may make available, arrange and/or pay vendors for these types of services rendered to TEA by independent third parties. Charles Schwab & Co., Inc. Advisor Services may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to TEA. TEA is independently owned and operated and not affiliated with Charles Schwab & Co., Inc. Advisor Services.

To mitigate the conflict of interest, this disclosure has been provided to you. You are free to consult other financial professionals. We are bound by our Code of Ethics and fiduciary duty to act in an ethical manner and place your interests first and foremost.

B. TEA does not directly or indirectly compensate any person who is not a supervised person of our firm for referrals.

Lastly, we do not compensate any person or entity for referring business to TEA.

Item 15 Custody

When it deducts fees directly from client accounts at a selected custodian, TEA will be deemed to have limited custody of client's assets and must have written authorization from the client to do so. Clients will receive all account statements and billing invoices that are required in each jurisdiction, and they should carefully review those statements for accuracy.

Item 16 Investment Discretion

TEA does not provide discretionary asset management services.

Item 17 Voting Client Securities

TEA does not vote your securities. Unless you suppress proxies, securities proxies will be sent directly to you by the account custodian or transfer agent. You may contact your Advisory Representative about questions you may have and opinions on how to vote the proxies. However, the decision to vote and how you vote the proxies is solely up to you.

Item 18 Financial Information

A. TEA will not require you to prepay more than $500 and six or more months in advance of receiving the advisory service; therefore, a balance sheet is not required to be attached.

B. TEA does not have discretionary authority over client accounts. We are financially stable. There is no financial condition that is likely to impair our ability to meet our contractual commitment to you or any other client.

C. Neither TEA nor any of its Advisory Representatives have ever been the subject of a bankruptcy petition.

Item 19 Requirements for State Registered Advisers

A. Information about the owners of TEA and their formal education, business background, and other businesses in which they are actively engaged can be found in the attached Brochure Supplement (ADV Part 2B).

B. TEA is not actively engaged in any business other than providing investment advice/financial planning.

C. Neither TEA nor any of its supervised persons charges performance-based fees.

D. TEA has not been the subject of a reportable legal or disciplinary event including a civil, self-regulatory organization, or administrative proceeding. TEA principals Elizabeth Jones and Susan Simon were involved in an employment-related arbitration with an investment-related firm and details are fully disclosed on their FINRA U4 forms. No clients were involved. Refer to Item 9 for additional information.

E. Neither TEA nor any of its management personnel have any arrangement or relationship with any

issuer of securities that is not previously disclosed in Item 10C above.

For California Residents:

- All material conflicts of interest under CCR Section 260.238 (k) are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonably expected to impair the rendering of unbiased and objective advice.
- While the firm endeavors at all times to offer clients its specialized services at reasonable costs, the fees charged by other advisers for comparable services may be lower than the fees charged by TEA.
- Pursuant to California Code of Regulations, 10 CCR Section 260.235.2, TEA hereby makes the following statement: a conflict exists between the interest of TEA and the interests of the client. Further, the client is under no obligation to act upon TEA recommendations, and if the client elects to act on any of the recommendations, the client is under no obligation to make transactions through TEA.

Item 20 Additional Information

Class Action Lawsuits

We do not determine if securities held by you are the subject of a class action lawsuit or whether you are eligible to participate in class action settlements or litigation nor do we initiate or participate in litigation to recover damages on your behalf for injuries as a result of actions, misconduct, or negligence by issuers of securities held by you.

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July 19, 2022

Form ADV Part 2B
Brochure Supplement

Elizabeth Jones

This brochure supplement provides information about Elizabeth Jones that supplements the Third Eye Associates, Ltd. brochure. You should have received a copy of that brochure. Please contact Elizabeth Jones at (845) 752-2216 if you did not receive Third Eye Associates, Ltd. brochure or if you have any questions about the contents of this supplement.

Additional information about Elizabeth Jones is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Elizabeth Jones is 3190846.

Item 2 Educational Background and Business Experience

Elizabeth A. Jones, RLP®, AIF®, CeFT®

Year of Birth: 1955

Education:

Name of School	Years Attended	Year Graduated	Degree	Major
Sudden Money® Institute	2007 to 2013	2013	Designation	Certified Financial Transitionist® (CeFT®) SMI Masters
University of Pittsburgh Joseph M. Katz Graduate School of Business	2009 to 2012	2012	Designation	Accredited Investment Fiduciary (AIF®)
Kinder Institute of Life Planning	2004 to 2006	2006	Designation	Registered Life Planner (RLP®)
Dutchess Community College	1973 to 1975			Liberal Arts

Financial Transitionist® Institute (a division of the Sudden Money® Institute)

The Financial Transitionist® Institute's (FTI) unique process is based on more than thirteen years of experience with the overlapping physical, psychological, sociological and financial aspects of managing a life transition. These training programs go deeper into the mechanics of Financial Transition Planning with an emphasis on hands-on experience using the core FTI protocols in real life case studies and advancing communication skills for FTI advisors and allied professionals working with clients and families facing life transition events and inter-generational transfers.

Starting with basic training in core competencies and advancing toward more rigorous and measurable competencies with peer review case presentations and the achievement of individually specific practice and business development objectives, the three levels of FTI Advisors are as follows:

Training and Coaching Program

Part One: 12-month Core Curriculum based on expanded list of core competencies demonstrated in real client case presentations for peer review, demonstration of a clear understanding of the mechanics of life transitions within the context of the practice of financial planning.

Part Two: 12-month Advanced Curriculum committed to deepening skills and having met the requirements of the curriculum and peer review approval. The objective is to provide qualifying advisors with a continuous experience-based education and coaching track, focused on practical solutions and client process for managing financial transition events.

Part Three: 5-day Inward Bound Experience, in-residence training focused on increasing confidence and the inner development of who you are as an advisor delivering a transformational experience through your work with clients.

FTI Masters - The ultimate level of ongoing development available to advisors completing Part One Core curriculum and Part Two Advanced Curriculum Training and Coaching. The Masters are

dedicated to maintaining a high standard of client care delivered with a level of professional competencies unique in the financial services industry and the financial planning profession.

Certified Financial Transitionist™ (CeFT®)

This designation is issued by the Financial Transitionist Institute, a division of the Sudden Money Institute to qualified candidates trained in the management of client adaptation to changing financial and life circumstances. CeFT® candidates must be in good standing with their primary professional designation governing body and meet the educational requirements set by this governing body, have five years of direct client engagement, complete a two-day workshop, a 12-month core training program, a 12-month advanced training program, a 7-day in-residence Inward Bound training, and satisfy quarterly assignments and oral case presentations. Those obtaining the designation must complete 15 hours of continuing education credits per year,

Foundation for Fiduciary Studies

The Foundation for Fiduciary Studies (Foundation) is a not-for-profit organization established in September of 2000 to develop and advance practice standards of care (Practices) for investment fiduciaries, which includes trustees, investment committee members, brokers, bankers, investment advisors, money managers, etc. It is independent of any ties to the investment community and therefore positioned to be a crucible for advancing the Practices throughout the industry.

The Foundation is dedicated to continuing to provide the most complete and up-to-date information regarding fiduciary responsibility. While the position of the Foundation is that the Practices define a complete process for investment fiduciaries, it will monitor the latest developments in the industry. New legislation, legal decisions and interpretations, and other current events have the ability to change roles and responsibilities of investment fiduciaries, and the Foundation is committed to advancing that knowledge to the public.

The Foundation operates with the Center for Fiduciary Studies, which is associated with the University of Pittsburgh Joseph M. Katz Graduate School of Business, Center for Executive Education; ranked among the top executive education programs in the nation. The Foundation for Fiduciary Studies received its initial funding from another foundation, to develop a "report card" that could be used to measure the effectiveness of the decision-making process of an investment fiduciary.

The Accredited Investment Fiduciary, or AIF® standard, is overseen by fi360, a fiduciary advocacy and education group in Sewickley, Pa. There are roughly 5,000 AIF® certificants, according to fi360. Most of those are investment advisors, but they also include investment managers and investment stewards such as plan sponsors, investment committee members and trustees.

The AIF® designation certifies that the recipient has specialized knowledge of fiduciary standards of care and their application to the investment management process. To receive the AIF® designation, individuals must complete a training program, successfully pass a comprehensive, closed-book final examination under the supervision of a proctor and agree to abide by the AIF® Code of Ethics. In order to maintain the AIF® designation, the individual must annually renew their affirmation of the AIF® Code of Ethics and complete six hours of continuing education credits.

The Kinder Institute of Life Planning

The Kinder Institute of Life Planning is a training organization offering workshops and intensive residential training for financial professionals. Life Planning focuses on the human side of financial

planning. In Life Planning we discover a client's deepest and most profound goals through a process of structured and non-judgmental inquiry. Then, using a mix of professional and advanced relationship skills, we inspire clients to pursue their aspirations, discuss and resolve obstacles, create a concrete financial plan, and provide ongoing guidance as clients accomplish their objectives.

The Institute's renowned introductory two-day workshop called The Seven Stages of Money Maturity® has been offered on four continents. Financial advisors can deepen their life-planning skill by taking the Institute's 5-day advanced training (in-residence) and 6-month mentorship program during which participants learn Kinder's signature EVOKE® methodology of client engagement. Once advisors have completed these trainings, they are eligible for the Registered Life Planner® designation.

Founder George D. Kinder, CFP®, RLP®, has been a leader in the financial planning industry for many years. He is the author of three books, most notably *The Seven Stages of Money Maturity: Understanding the Spirit and Value of Money in your Life* and *Lighting the Torch: The Kinder Method of Life Planning*. The recipient of numerous awards, Kinder has been featured in the Financial Times, New York Times, Wall Street Journal, New Model Advisor and Journal of Financial Planning. The Kinder Institute has certified 200+ Registered Life Planners®.

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Third Eye Associates, Ltd	Advisory and Financial Planning	President Advisory Representative	06/2005 to Present 03/2009 to Present
Commonwealth Financial Network	Broker/Dealer and Investment Adviser	Registered Representative Advisory Representative	08/2005 to 12/2011

Item 3 Disciplinary Information

Elizabeth Jones is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of her or the services offered by her.

Item 4 Other Business Activities

Elizabeth Jones is President and an Advisory Representative for Third Eye Associates, Ltd. (hereinafter referred to as "TEA"). She is not involved in any other business activity.

Item 5 Additional Compensation

Product vendors recommended by Elizabeth Jones provide monetary and non-monetary assistance with client events and provide educational tools and resources. She does not select products as a result of any monetary or non-monetary assistance. The selection of product that is most appropriate for the client is first and foremost. Her due diligence review of a product does not take into consideration any

assistance she may receive. While the receipt of products or services is a benefit for you and us, it also presents a conflict of interest.

Additionally, Elizabeth Jones is provided with the opportunity to attend training or education conferences through AssetMark that include the payment or reimbursement of travel and meal expenses for attendees. Payment/reimbursement of expenses is not contingent upon sales targets or contests, but rather on total assets managed on the AssetMark platform. This creates conflicts of interest as it provides an incentive to recommend Third-Party Management programs that provide the above referenced opportunities over those that do not.

To mitigate the conflict of interest, this disclosure has been provided to you. You have the right to decide whether or not to engage our services and you are free to consult other financial professionals. Elizabeth Jones is bound by a Code of Ethics and fiduciary duty to act in an ethical manner and place your interests first and foremost.

Item 6 Supervision

Elizabeth Jones is President and Advisory Representative and supervises all activities conducted through TEA. She maintains policies and procedures to guide her activities and adheres to a Code of Ethics. Elizabeth Jones can be contacted at (845) 752-2216.

Item 7 Requirements for State Registered Advisers

Elizabeth Jones has not been involved in any civil, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices.

Additionally, she has not been the subject of a bankruptcy petition.

The only item deemed to be applicable, solely by the California Department of Financial Protection and Innovation, is an event that occurred more than ten years ago involving a 4-month FINRA suspension related to an employment matter that did not involve any clients. Otherwise, Elizabeth Jones has no other required disclosures under this item. For further details regarding this employment-related arbitration, see Elizabeth Jones' Form U4 and TEA's ADV Part 2A, Item 9.

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October 26, 2026

Form ADV Part 2B
Brochure Supplement

Robert Alonso

This brochure supplement provides information about Robert Alonso that supplements the Third Eye Associates, Ltd. brochure. You should have received a copy of that brochure. Please contact Elizabeth Jones at (845) 752-2216 if you did not receive Third Eye Associates, Ltd. brochure or if you have any questions about the contents of this supplement.

Additional information about Robert Alonso is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Robert Alonso is 7182718.

Item 2 Educational Background and Business Experience

Robert Alonso

Year of Birth: 1992

Education:

Name of School	Years Attended	Year Graduated	Degree	Major
Southern New Hampshire University	2015-2016		MBA	Business Administration: Finance Concentration
Dominican College		2015	BA	Business Administration /Management, Communications
University of Pennsylvania		2020	Certification	Business Analytics
University of Virginia		2020	Certification	Financial Accounting, Fundamentals Certificate

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Third Eye Associates, Ltd	Advisory and Financial Planning	Investment Adviser Representative Vice President/Secretary Director of Investments Operations Manager	12/2021 to Present 10/2026 – Present 01/2026 – Present 06/2021 to 01/2026
J.P. Morgan Securities LLC.	Financial Services	Licensed Banker	09/2019 to 06/2021
JP Morgan Chase Bank, N.A.	Financial Services	Personal Banker	07/2017 to 06/2021
Over The River Farm	Farm	Laborer	06/2017 to 05/2018
Emerson Resort & Spa	Resort and Spa	Bellhop	02/2018 to 04/2018
New Paltz Bus Depot	Bus Depot	Ticket Agent	08/2015 to 06/2017
Seeds Design	Landscaping	Gardener Landscaping	08/2015 to 05/2017

Item 3 Disciplinary Information

Robert Alonso is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of him or the services offered by him.

Item 4 Other Business Activities

Robert Alonso is separately licensed as an independent insurance agent. In this capacity, he can make transactions in insurance products for his clients and earn commissions for these activities. The fees you pay our firm for advisory services are separate and distinct from the commissions earned by Mr. Alonso for insurance-related activities. This presents a conflict of interest because Mr. Alonso may have an incentive to recommend insurance products to you for the purpose of generating commissions rather than solely based on your needs. However, you are under no obligation, contractual or otherwise, to purchase insurance products through any person affiliated with our firm.

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Mr. Alonso's receipt of additional compensation as a result of his other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Third Eye Associates, Ltd.'s firm brochure for additional disclosures on this topic.

Item 6 Supervision

Elizabeth Jones is President and Advisory Representative and supervises all activities conducted through TEA. She maintains policies and procedures to guide her activities and adheres to a Code of Ethics. Elizabeth Jones can be contacted at (845) 752-2216.

Item 7 Requirements for State Registered Advisers

Robert Alonso has not been involved in any civil, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices.

Additionally, he has not been the subject of a bankruptcy petition.

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June 2, 2026

Form ADV Part 2B
Brochure Supplement

Jill Marjorie Schum

This brochure supplement provides information about Jill Marjorie Schum that supplements the Third Eye Associates, Ltd. brochure. You should have received a copy of that brochure. Please contact Elizabeth Jones at (845) 752-2216 if you did not receive Third Eye Associates, Ltd. brochure or if you have any questions about the contents of this supplement.

Additional information about Jill Marjorie Schum is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Jill Marjorie Schum is 4211786.

Item 2 Educational Background and Business Experience

Jill Marjorie Schum

Year of Birth: 1979

Education:

Name of School	Years Attended	Year Graduated	Degree	Major
Rutgers University	2000-2006	2006	Bachelor of Arts	Communication

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Third Eye Associates, Ltd	Advisory and Financial Planning	Investment Adviser Representative	04/2026 to Present
Third Eye Associates, Ltd	Advisory and Financial Planning	Operations Associate/Manager	07/2022 to 03/2026
Perfectress US	Hair Care Products	Education & Office Manager	10/2019 to 06/2022

Item 3 Disciplinary Information

Jill Marjorie Schum is not subject to legal or disciplinary events that are material to a client or prospective client's evaluation of her or the services offered by her.

Item 4 Other Business Activities

Jill Marjorie Schum is not engaged in any investment-related business or occupation (other than this advisory firm).

Item 5 Additional Compensation

Refer to the *Other Business Activities* section above for disclosures on Jill's receipt of additional compensation as a result of her other business activities.

Also, refer to the *Fees and Compensation*, *Client Referrals and Other Compensation, and Other Financial Industry Activities and Affiliations* section(s) of Third Eye Associates, Ltd.'s firm brochure for additional disclosures on this topic.

Item 6 Supervision

Elizabeth Jones is President and Advisory Representative and supervises all activities conducted through TEA. She maintains policies and procedures to guide her activities and adheres to a Code of Ethics. Elizabeth Jones can be contacted at (845) 752-2216.

Item 7 Requirements for State Registered Advisers

Jill Marjorie Schum has not been involved in any civil, or administrative proceeding involving an investment or investment-related business or activity, fraud, false statement(s), or omissions, theft, embezzlement, or other wrongful taking of property, bribery, forgery, counterfeiting, or extortion, or dishonest, unfair, or unethical practices.

Additionally, she has not been the subject of a bankruptcy petition.