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March 10, 2019

**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. also is 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.

MATERIAL CHANGES

Item 2

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 are 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.

Our last annual amendment occurred on March 15, 2018. Since that date, we have made the following changes to our brochure and brochure supplements:

- We revised Item 5 to disclose our hourly and six-month retainer fees for the Financial Life Planning Programs and to describe the services received under each Program.
- In Item 8, we disclose the risks associated with exchange-traded funds (ETFs).

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.

TABLE OF CONTENTS

Item 3

COVER PAGE Item 1 1
MATERIAL CHANGES Item 2..... 2
TABLE OF CONTENTS Item 3 3
ADVISORY BUSINESS Item 4..... 4
FEES AND COMPENSATION Item 5..... 8
PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT Item 6..... 11
TYPES OF CLIENTS Item 7 11
METHODS of ANALYSIS, INVESTMENT STRATEGIES and RISK of LOSS Item 8 11
DISCIPLINARY INFORMATION Item 9 12
OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS Item 10 12
CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and
PERSONAL TRADING Item 11..... 13
BROKERAGE PRACTICES Item 12 14
REVIEW of ACCOUNTS Item 13..... 14
CLIENT REFERRALS and OTHER COMPENSATION Item 14..... 15
CUSTODY Item 15 15
INVESTMENT DISCRETION Item 16..... 16
VOTING CLIENT SECURITIES Item 17 16
FINANCIAL INFORMATION Item 18..... 16
REQUIREMENTS for STATE REGISTERED ADVISERS Item 19 16
Brochure Supplements

ADVISORY BUSINESS

Item 4

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 created in 2005 and filed for investment adviser registration with the State of New York in March 2009. Elizabeth Jones, RLP[®], AIF[®], CeFT[™], CRD number 3190846, President, Chief Compliance Officer and Advisory Representative, has been in the financial services industry since 1999. Susan Simon, RFC[®], RLP[®], CLTC, CRD number 4218669, Vice President and Advisory Representative, has been in the financial services industry since 2000. Additional business information about the Advisory Representatives is disclosed 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. If you do choose to implement the plan with our Advisory Representatives, they will receive commissions or other compensation in addition to the advisory fee you paid for financial planning services.

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, Elizabeth Jones and/or Susan Simon, 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 3 Questions, Heart's Core Grid, Life Goals Grid, and Vision for Life. We use Financial Transitionist® Institute tools such as Purpose-Method-Outcome 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. However, when appropriate, we will recommend the services of AssetMark, Inc. or other third party manager which may offer a wrap fee program.

E. TEA does not provide asset management services; however, 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 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 70.5 (70½).
 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.

FEES AND COMPENSATION

Item 5

Financial Planning Services

Fees for planning services are strictly for planning services. Therefore, you may pay fees and/or commissions for additional services obtained such as asset management or 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.

Hourly fee: \$250 per hour, with a minimum fee of \$750, 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— \$5,600+ six-month rate (25+ hrs)

9 - 2 hour sessions w/Planner

4 hours Consulting sessions

1 Financial Plan (3 hrs)

Couples— \$4,500 six-month rate (20 hrs)

7 - 2 hour sessions w/Planner

3 hours Consulting sessions

1 Financial Plan (3 hrs)

Standard— \$4,000 six-month rate (17.5 hrs)

7 - 90 min sessions w/Planner

4 hours Consulting sessions

1 Financial Plan (3 hrs)

Maintenance— \$2,000 annual rate (8 hrs)

Up to 8 hours Planning/Consulting

Transition Planning

\$6,000+ 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 with 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.

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 quarterly, in advance, based upon the market value of the assets held in your account at the end of the preceding calendar quarter. Your account fee will be debited each quarter from your account by AssetMark 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. Clients selecting a “wrap fee” program may pay fees in excess of the combined total of separate advisory fees and brokerage commissions paid on a transactional basis. If a “wrap fee” program is not selected, clients may incur fees in addition to those charged by the Third Party Manager such as transaction fees charged by Broker/Dealers. If a “wrap fee” program is selected, the client will also receive the Form ADV 2A Brochure Appendix 1 provided by the sponsor of the program.

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.

PERFORMANCE-BASED FEES AND SIDE BY SIDE MANAGEMENT Item 6

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

TYPES OF CLIENTS Item 7

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.

METHODS of ANALYSIS, INVESTMENT STRATEGIES and RISK of LOSS Item 8

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.

B. 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.

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.

You need to understand that investing in securities involves risk of loss, including 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, warrant 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.

DISCIPLINARY INFORMATION

Item 9

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. There is no reportable disciplinary information required for TEA or its management persons.

OTHER FINANCIAL INDUSTRY ACTIVITIES and AFFILIATIONS

Item 10

A. , B. 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.

C. TEA may recommend Shareholders Service Group, Inc. and their custodian, Pershing LLC for brokerage and custodial services. Shareholders Service Group offers brokerage platforms and institutional custodial services for independent registered investment advisers. TEA is not affiliated with Shareholders Service Group or Pershing. Neither firm supervises TEA, its agents or activities.

Advisory Representative Susan Simon is licensed with various insurance companies. The insurance business represents a small part of our total activities and we do not concentrate resources in this area. However, she will earn commissions if you purchase insurance products through her in her role as an insurance agent. This creates a conflict of interest. You are under no obligation to purchase insurance products or services through Susan Simon. Clients have the right to decide whether or not to purchase insurance products and which insurance professionals to use.

TEA attempts to mitigate the 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.

D. 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.

**CODE of ETHICS, PARTICIPATION or INTEREST in CLIENT TRANSACTIONS and
PERSONAL TRADING** **Item 11**

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 recommends 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 may buy or sell securities identical to those securities recommended to you. Therefore, TEA and/or its associated persons have an interest or position in certain securities that are also recommended and bought or sold to you. This situation creates a conflict of interest in that TEA and/or its associated persons benefit from the sale or purchase of those securities. TEA has policies in place to detect any abusive practices and mitigate any conflict of interest (see Item 11D below). They will not put their interests before your interest. Neither TEA nor any associated person may trade ahead of you or trade in such a way to obtain a better price for themselves than for you or other clients.

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.

BROKERAGE PRACTICES

Item 12

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 client establish an account with Shareholders Service Group, Inc. because we reasonably believe they will provide you with best execution. In seeking best execution, the determinative factor is not the lowest possible commission costs, but whether the transaction represents the best qualitative execution, taking into consideration the full range of services provided including research, execution, commission rates, and responsiveness. For more information on Shareholders Service Group, please refer to Item 10 Other Financial Industry Activities and Affiliations above. TEA is not affiliated with Shareholders Service Group. Shareholders Service Group does not supervise TEA, its agents or activities.

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

REVIEW of ACCOUNTS

Item 13

A. Upon completion of your 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.

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 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 quarterly statements and confirmations of all transactions in your account. In addition, the Third Party Manager will provide you with a quarterly performance report.

CLIENT REFERRALS and OTHER COMPENSATION

Item 14

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.

Under AssetMark's Business Development Allowance program, TEA receives an annual business development allowance of \$10,000 for reimbursement of qualified marketing/practice development expenses incurred by TEA Advisory Representatives. These allowances are earned based upon the value of the assets on the AssetMark Platform collectively held by clients of TEA Advisory Representatives.

Additionally, Elizabeth Jones and Susan Simon are provided with the opportunity to attend training or education conferences. Such conferences include the payment or reimbursement of travel, meals, and lodging 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.

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.

CUSTODY

Item 15

TEA does not have physical custody of your funds or securities. Pershing LLC is the custodian for those clients with accounts held at Shareholders Service Group, Inc. TEA is not affiliated with Shareholders Service Group or Pershing. Neither firm supervises TEA, its agents or activities.

AssetMark, Inc. is the custodian for client accounts held at AssetMark. TEA and AssetMark are not affiliated.

INVESTMENT DISCRETION

Item 16

TEA does not provide discretionary asset management services.

VOTING CLIENT SECURITIES

Item 17

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.

FINANCIAL INFORMATION

Item 18

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 contract actual commitment to you or any other client.

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

REQUIREMENTS for STATE REGISTERED ADVISERS

Item 19

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.

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.

**Third Eye Associates, Ltd.
38 Spring Lake Road
Red Hook, NY 12571-2239**

Phone: 845-752-2216

Fax: 845-853-1491

Website: www.thirdeyeassociates.com

March 10, 2019

**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.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Item 2

Elizabeth A. Jones, RLP[®], AIF[®], CeFT[™]

Year of Birth: 1955

Education:

Name of School	Years Attended	Year Graduated	Degree	Major
Bryant University	2014 to Present	—	—	Enrolled in Certified Financial Planner Program
Sudden Money [®] Institute	2007 to 2013	2013	Designation	Certified Financial Transitionist [™] (CeFT [™]) SMI Masters
Foundation for Fiduciary Studies	2009 to 2012	2012	Designation	Accredited Investment Fiduciary (AIF [®])
Kinder Institute of Life Planning	2004 to 2006	2006	Designation	Registered Life Planner (RLP [®])
Kaplan College of Financial Planning	2001 to 2009			Certified Financial Planner [™]
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 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 the 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

Third Eye Associates, Ltd.

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 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, satisfy quarterly assignments and oral case presentations. Those obtaining the designation must complete 15 hours of continuing education credits per year, sign the FTI Standards of Care and Code of Ethics, and have no client complaints or legal actions.

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 trainings 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

Third Eye Associates, Ltd.

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[®].

The **CERTIFIED FINANCIAL PLANNER[™]**, CFP[®] and federally registered CFP (with flame design) marks (collectively, the "CFP[®] marks") are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. ("CFP Board").

The CFP[®] certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP[®] certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP[®] certification in the United States.

To attain the right to use the CFP[®] marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board's financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP[®] Certification Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board's *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP[®] marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP[®] professionals provide financial planning services at a fiduciary

Third Eye Associates, Ltd.

standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

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 02/2009 to Present
Commonwealth Financial Network	Broker/Dealer and Investment Adviser	Registered Representative Advisory Representative	08/2005 to 12/2011
Walnut Street Securities, Inc.	Broker/Dealer and Investment Adviser	Registered Representative Advisory Representative	08/2003 to 08/2005
Nathan & Lewis Securities, Inc.	Broker/Dealer and Investment Adviser	Registered Representative Advisory Representative	01/2002 to 08/2003
Christopher Street Financial, Inc.	Broker/Dealer	Registered Representative	01/1999 to 12/2001
B Jones & Co	Marketing, Advertising, Design Firm	Creative Director/Owner	10/1993 to 2/1999

DISCIPLINARY INFORMATION

Item 3

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.

OTHER BUSINESS ACTIVITIES

Item 4

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

ADDITIONAL COMPENSATION

Item 5

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 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.

Under AssetMark’s Business Development Allowance program, TEA receives an annual business development allowance of \$10,000 for reimbursement of qualified marketing/practice development

expenses incurred. These allowances are earned based upon the value of the assets on the AssetMark Platform collectively held by clients of TEA Advisory Representatives.

Additionally, Elizabeth Jones is provided with the opportunity to attend training or education conferences that include the payment or reimbursement of travel, meals, and lodging 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.

SUPERVISION

Item 6

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.

REQUIREMENTS FOR STATE REGISTERED ADVISERS

Item 7

Elizabeth Jones has not been involved in any arbitration claim or civil, self-regulatory organization, 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.

Elizabeth Jones was involved in an employment related arbitration with an investment related firm and details are fully disclosed on her FINRA U4 form. No clients were involved.

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

**Third Eye Associates, Ltd.
38 Spring Lake Road
Red Hook, NY 12571-2239**

Phone: 845-752-2216

Fax: 845-853-1491

Website: www.thirdeyeassociates.com

March 10, 2019

**Form ADV Part 2B
Brochure Supplement**

Susan Simon

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

Additional information about Susan Simon is available on the SEC's website at www.adviserinfo.sec.gov. The searchable CRD number for Susan Simon is 4218669.

EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE

Item 2

Susan Simon, RFC[®], RLP[®], CLTC

Year of Birth: 1950

Education:

Name of School	Years Attended	Year Graduated	Degree	Major
Corporation for Long-Term Care Certification, Inc.	2006	2006	Designation	CLTC (Certified in Long Term Care)
Kinder Institute of Life Planning	2004 to 2006	2006	Designation	RLP [®] (Registered Life Planner)
Kaplan College of Financial Planning	2001 to 2005	2005	Certificate	Certified Financial Planner [™]
Southampton College	1968 to 1972			Political Science

The **CERTIFIED FINANCIAL PLANNER[™] (CFP[®])** and federally registered CFP (with flame design) marks (collectively, the “CFP[®] marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP[®] certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP[®] certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with clients. Currently, more than 71,000 individuals have obtained CFP[®] certification in the United States.

To attain the right to use the CFP[®] marks, an individual must satisfactorily fulfill the following requirements:

- Education – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services, and attain a Bachelor’s Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the comprehensive CFP[®] Certification Examination. The examination includes case studies and client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real world circumstances;
- Experience – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- Ethics – Agree to be bound by CFP Board’s *Standards of Professional Conduct*, a set of documents outlining the ethical and practice standards for CFP[®] professionals.

Third Eye Associates, Ltd.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- Continuing Education – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics* and other parts of the *Standards of Professional Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- Ethics – Renew an agreement to be bound by the *Standards of Professional Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board's enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Corporation for Long-Term Care Certification, Inc.

CLTC stands for "Certified in Long-Term Care," a designation granted by the Corporation For Long-Term Care Certification. CLTC graduates have completed a rigorous multidisciplinary course that focuses on the profession of long-term care. The program is recognized by state regulators, through the granting of continuing education credits, as having provided essential information necessary to the appropriate sale of long-term care insurance.

The "Certified in Long-Term Care" (CLTC) designation is obtained by taking a 7-part multi-disciplinary course. The program is offered either in a 2-day classroom setting, referred to as the Master Class, or by Correspondence Course. The Master Class is taught nationally by CLTC trained instructors, all of whom have extensive experience in selling long-term care insurance. The program qualifies for CE credits in all states.

Designee must also submit:

- A certificate of good standing, or equivalent, from the designee's state insurance authority
- An affidavit, under oath, from the student stating he or she has not had a judgment relating to fraudulent behavior in their profession entered against him or her in the past 5 years

All graduates of the Certified in Long-Term Care (CLTC) program are required by the independent CLTC Board of Standards, Inc. (Board) to renew their designation yearly, at which time they must show that they have maintained a minimum standard of competence. It is based on the principle that graduates can continue to serve their clients with the highest degree of professionalism only if kept informed on advances in planning techniques and changes in both the long-term care insurance market and regulatory bodies.

The Board has determined that this essential information is not currently available through continuing education programs. After a thorough review of the content available on the CLTC Graduate web site (Site) the Board has determined that it provides the tools to meet the minimum standards to maintain competency.

Third Eye Associates, Ltd.

CLTC Board of Standards, Inc. CLTC Pledge

1. CLTC designation is the first step in a commitment to the profession of long - term care planning.
2. In order to serve clients with the highest degree of professionalism designee must stay informed on advances in planning techniques and changes in both the long-term care insurance market and regulatory bodies.
3. CLTC Board of Standards has set minimum educational criteria for renewing the designation. The materials and services that allow me to meet those criteria are contained in the CLTC Graduate web site. Failure to renew access to required CLTC education will act as a voluntary relinquishment of the CLTC designation.
4. The CLTC Board of Standards, Inc. requires success completion of a CLTC Ethics course every two years in order to continue holding the CLTC Designation.
5. Designee must abide to the terms of the *CLTC Code of Professional Responsibility*, including continued learning.

International Association of Registered Financial Consultants (IARFC)

The IARFC is dedicated to educate, support, and advance the professionalism of the financial advisors who are helping the public to spend, save, invest, insure, and plan for the future. The IARFC was founded in 1984 as an education and practice management exchange of highly qualified planners that met stringent education, licensing, ethics and continuing education requirements.

RFC[®] - Registered Financial Consultant is a professional designation awarded by the IARFC to those financial advisors who meet high standards of education, experience and integrity.

When authorized to use the RFC[®] and Registered Financial Consultant certification marks the professional agrees to abide by the IARFC Code of Ethics and to comply with the philosophy and mission of International Association of Registered Financial Consultants.

To attain the right to use the RFC[®] marks, an individual must satisfactorily fulfill the following seven stringent requirements:

- Experience – Minimum of four years of experience as a full-time practitioner in the field of financial planning;
- Education – Complete a CFP[®] equivalent or IARFC approved curriculum at an accredited college or university addressing the financial planning subject areas that CFP Board's studies have determined as necessary for the competent and professional delivery of financial planning services. CFP Board's financial planning subject areas include fundamentals of financial planning, insurance & employee benefits, investment planning, income tax planning, retirement planning, and estate planning;
- Examination – Pass the six part Certificate in Financial Planning Examination. The examination includes case studies and client scenarios designed to test one's ability to correctly diagnose financial planning issues and apply one's knowledge of financial planning to real world circumstances;
- Licensing – Meet the licensing requirements for securities and life and health insurance, or if fee-only, submit Registered Investment Adviser affiliation;
- Professional Record – Must have a sound record of business integrity with no suspensions or revocation of any professional license.
- Ethics – Agree to subscribe and adhere to the RFC[®] Code of Ethics
- Continuing Education – The maintenance of proficiency with a minimum of 40 hours per year of continuing education in the field of financial planning distinguishes the RFC[®] from other professionals. The IARFC is convinced that extensive on-going professional education is essential for an advisor to serve the public effectively.

While serving a number of needs for its members, the primary purpose of the IARFC is to provide the public with a pool of well-qualified practitioners from which to choose a personal advisor. The RFC® designation is removed from anyone who fails to maintain proficiency through substantial continuing education, or who betrays the public trust by failing to live up to its Code of Ethics or by having a professional license revoked or suspended for any reason.

IARFC Code of Ethics

- A Registered Financial Consultant will at all times put the client's interest above their own.
- A Registered Financial Consultant will maintain proficiency in their work through continuing education.
- A Registered Financial Consultant will abide by both the spirit and the letter of the laws and regulations applicable to financial planning services.
- When fee-based services are involved, a Registered Financial Consultant will charge a fair and reasonable fee based on the amount of time and skill required.
- A Registered Financial Consultant will give clients the same service they would give themselves in the same circumstances.

The Kinder Institute of Life Planning

The Kinder Institute of Life Planning is a training organization offering workshops and intensive residential trainings 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 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®.

Third Eye Associates, Ltd.

Business Background:

Name of Employer	Type of Business	Title	Period of Employment
Third Eye Associates, Ltd.	Advisory and Financial Planning	Vice President Advisory Representative	06/2005 to Present 02/2009 to Present
Commonwealth Financial Network	Broker/Dealer and Investment Adviser	Registered Representative Advisory Representative	08/2005 to 12/2011
Walnut Street Securities, Inc.	Broker/Dealer and Investment Adviser	Registered Representative Advisory Representative	08/2003 to 08/2005
Nathan & Lewis Securities, Inc.	Broker/Dealer and Investment Adviser	Registered Representative Advisory Representative	01/2002 to 08/2003
Christopher Street Financial, Inc.	Broker/Dealer	Registered Representative	02/2000 to 12/2001
Landmark Education Corp.	Educational Company	Finance Manager Wisdom Division	03/1998 to 01/2000

DISCIPLINARY INFORMATION

Item 3

Susan Simon 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.

OTHER BUSINESS ACTIVITIES

Item 4

In addition to serving as Vice President and as an Advisory Representative for Third Eye Associates, Ltd. (hereinafter referred to as "TEA"), Susan is a licensed insurance agent. You are not obligated to purchase insurance products through Susan. However, if you implement insurance recommendations through her, she will receive commissions. The insurance business comprises approximately 1% of her time. The amount of income she receives from insurance business will fluctuate depending on the amount of sales. There may be other insurance products and services available through other insurance professionals at a lower cost than those products available through Susan. Clients have the right to decide whether or not to purchase insurance products and which insurance professionals to use.

ADDITIONAL COMPENSATION

Item 5

Product vendors recommended by Susan Simon 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 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.

Under AssetMark's Business Development Allowance program, TEA receives an annual business development allowance of \$10,000 for reimbursement of qualified marketing/practice development

Third Eye Associates, Ltd.

expenses incurred. These allowances are earned based upon the value of the assets on the AssetMark Platform collectively held by clients of TEA Advisory Representatives.

Additionally, Susan Simon is provided with the opportunity to attend training or education conferences that include the payment or reimbursement of travel, meals, and lodging 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. Susan Simon is bound by a Code of Ethics and fiduciary duty to act in an ethical manner and place your interests first and foremost.

SUPERVISION

Item 6

Susan Simon is the Vice President and an Advisory Representative of TEA. Supervision and oversight of the activities conducted through TEA is conducted by Elizabeth Jones, President of TEA. Elizabeth Jones can be contacted at (845) 752-2216.

Elizabeth Jones reviews transactions conducted in clients' accounts. Additionally, all account information required to establish an account for a client must flow through Elizabeth. Mrs. Jones and TEA have procedures in place to be aware of any outside business activities engaged in by Susan Simon, oversee communications with the public, and review personal trading activities of Susan as well as in any account over which she has direct or indirect beneficial interest.

REQUIREMENTS FOR STATE REGISTERED ADVISERS

Item 7

Susan Simon 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.

Susan Simon was involved in an employment related arbitration with an investment related firm and details are fully disclosed on her FINRA U4 form. No clients were involved.

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