



*Old Field
Advisors LLC*

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Form ADV Parts 2A, 2B and Privacy Notice

April, 2024

This brochure provides information about the qualifications and business practices of Old Field Advisors LLC. If you have any questions about the contents of this brochure, please contact us at 631-751-7230 or gtm@oldfieldadvisors.com.

The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (SEC) or by any state securities authority. *Registration does not imply a specific level of skill or training.*

Additional information about **Old Field Advisors LLC (CRD #: 134519)** is available on the SEC's website at adviserinfo.sec.gov.

Item 2 Material Changes

There have been no material changes to this brochure since the filing of the last amendment in April, 2023.

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Item 4 Advisory Business

Old Field Advisors LLC (“Old Field Advisors” or “firm”) is a New York domiciled Limited Liability Company. The firm was formed in 2005. Gigi Turbow Marx is the firm’s managing member, majority shareholder and designated principal (supervisor).

Old Field Advisors provides *fee-only* financial planning and wealth management services. As a registered investment advisor, Old Field Advisors is held to a fiduciary standard of care.

Services Provided

Old Field Advisors' offers financial planning and wealth management services to individuals, families, trusts, estates, privately held businesses and non profit organizations.

We may also sub advise third-party independent registered investment advisors on (i) tax managed diversification of concentrated holdings, (ii) philanthropic strategies and/or (iii) mission driven portfolio construction.

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

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

Financial Planning Services

Clients may engage the firm to advise them on a wide range of concerns including cash flow analysis, retirement income needs, education funding, tax strategies, estate planning, charitable giving, and insurance protection needs. A *financial planning* project may be as broad-based or as narrowly focused as you request. However, clients need to recognize that focusing on narrow areas of interest or need, may result in incomplete analysis.

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

- Tax returns
- Current earned income details, including W2s or 1099s
- Current retirement plans and insurance provided by the client’s employer
- Investments held in your retirement and non-retirement accounts
- Mortgage information
- Insurance policies
- Copies of wills and trusts
- Other legal or financial documents pertinent to your planning goals

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

Portfolio reviews and comprehensive planning engagements analyze your assets for opportunities to improve diversification, tax efficiency and risk management, consistent with your risk capacity. Clients manage their own accounts, including trading unless they elect to retain the firm for ongoing wealth management.

Financial planning clients retain full discretion over implementation decisions and may accept or reject any recommendation we make. If you elect to act on any of our recommendations, you are under no obligation to complete them through our firm.

It remains the client's responsibility to notify us if there are changes in your financial situation or investment objectives that affects prior recommendations.

Wealth Management Retainers

Clients may also engage the firm for *wealth management* services. *Wealth management* includes integrated financial planning guidance and discretionary management of a client's investment portfolio on an ongoing basis. Investment portfolio management includes meeting clients' cash management and asset allocation goals and the rebalancing or trading required to achieve those goals.

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

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

We employ both active and passive investment strategies appropriate for individual investors, as described in further detail in Item 8 of this brochure.

Webinar or Workshop Presentations

The firm will provide customized educational workshops on request, for groups desiring general advice on investments and personal finance. Webinars and workshops are educational in nature and do not involve the sale of any investment products. Topics may include diversification of concentrated holdings, ESG impact focused investments, philanthropic strategies or hedging portfolio risks with exchange traded options.

Information presented at a workshop will not be based on any one person's need, nor do we provide individualized investment advice to attendees during general sessions.

Assets under Management

As of January 31, 2024, Old Field Advisors had regulatory assets under management on a discretionary basis in the amount of \$26,164,025.

Item 5 Fees and Compensation

Financial Planning Fees

Old Field Advisors offers time based financial planning services billed at an hourly fee of

\$400 per hour	for lead advisors' time
\$175-275 per hour	for financial planners' time
\$125 per hour	for administrative support

Billable time is accrued in fifteen-minute increments, and a partial increment will be treated as a whole. We discuss the services you need and provide you with a quote on planning projects cost for your acceptance before proceeding on your analysis.

Note that we use client portals managed by eMoney, a subsidiary of Fidelity Investments, for electronic data exchange. Those portals are a convenience for our clients, improve data integrity and are included in our fee structure. *Manual data entry* is available upon request for an additional charge, billed at a rate of \$150 per hour.

After the initial engagement, many clients use the firm's services on a periodic, as-needed basis. If a client's needs are sporadic and their account is in good standing, in our discretion, we will bill in arrears. If a client expects to need more consistent follow up, we offer *wealth management* services.

The firm requires a deposit for financial planning projects in the amount of the *lesser of* \$800 or 100% of the fee. The balance of fees due are payable upon our presentation of the plan or advice to you or your legal agent.

Wealth Management Fees

Wealth management fees for integrated financial planning and investment management are determined by the complexity of your financial concerns and overall portfolio, the number of individual accounts under advisement or management, and similar considerations.

- Wealth management fees are fixed annual retainers, reviewed annually, and paid 25% each quarter, in arrears.
- Old Field Advisors does not have a minimum asset policy but we do charge a minimum fee of \$6,000 p.a.
- The services to be provided and a client's wealth management fee are detailed in a written service agreement.

Depending upon the size of the portfolio and the complexity of the services to be provided, we may require an *initial set up fee* of up to one-half the annual wealth management fee.

Thereafter, fees are billed quarterly in arrears and will be deducted from one or more managed accounts, in accordance with your preference. Partial periods of service will be pro-rated for the number of days the agreement has been in force.

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

Old Field Advisors' fees are reviewed annually and are based on multiple factors beyond assets under management. Clients or the firm may request an adjustment to the *wealth management* fee if there is a material change in the assets managed or client needs. Common causes for such a review might include a change in circumstances that require adjustments to a client's financial plan and the reallocation of assets under our management or significant changes in assets brought into or withdrawn from a client's investment portfolio.

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

Third-Party Fees

Clients will also incur certain charges imposed by third parties (custodians, broker-dealers, platforms, and others) regarding investments made in the account(s). Third party charges may include but are not limited to brokerage commissions; transaction, exchange, trade away and clearing fees; account, wire, and electronic fund transfer fees; margin interest; custodial fees; administration and termination fees; and other costs and expenses. If a sub-adviser is used for your account, you will pay that entity its sub-advisory fees. *Old Field does not receive any portion of these commissions, fees, and charges.*

Old Field Advisors typically invests client assets in mutual funds and exchange-traded funds (ETFs). The costs and expenses charged by these fund(s) to their shareholders, such as management and administrative fees, are in addition to Old Field Advisors' advisory fees.

Termination of Services

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

The firm reserves the right to terminate any financial planning engagement when a client has refused to provide information necessary and appropriate to complete the engagement.

Following receipt of a termination notice, the firm will not be responsible for future asset allocations, transactional services, or investment advice. Wealth management clients or their

legal representatives are responsible for ensuring the transfer of any portfolio, account, or account residual to the receiving service provider.

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

The firm does not charge fees based upon a share of capital gains or capital appreciation known as “performance-based fees.”

Item 7 Types of Clients

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

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

Method of Analysis

If we are engaged to provide *wealth management* services, we will first evaluate several factors, including your:

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

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

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

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

Investment Strategies

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

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

Each *wealth management* client executes an IPS that documents their objectives and their investment preferences. Clients may adjust these objectives over time, as their goals and circumstances evolve.

Investments include any publicly traded equities (stocks), warrants, corporate debt securities, commercial paper, certificates of deposit, municipal securities, investment company securities (variable annuities, ETFs, and mutual funds shares), U.S. government securities, exchange traded options or futures contracts, and interest in partnerships. Initial public offerings (IPOs) are not available through Old Field Advisors.

Risk of Loss

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

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

may result in bankruptcy and/or a declining market value.

- **Systemic Climate or Health Risks:** Climate or weather-related impairment of human, real, or financial assets; freezing of global supply chains or economies due to pandemic.

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

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

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

Item 9 Disciplinary Information

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

Item 10 Other Financial Industry Activities and Affiliations

The firm and its associates are not affiliated with a firm regulated by FINRA or the CFTC/NFA.

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

When appropriate, the firm may partner with other Garrett members. Each firm will be paid for the services they render to the client and each representative will disclose, in advance of signing a client services agreement,

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

Associates of the firm may hold individual membership or serve on committees or board of professional industry associations such as the National Association of Personal Financial Advisors (NAPFA); Financial Planning Association (FPA), or the Certified Financial Planner Board of Standards, Inc. Generally, participation in any of these entities require meeting professional

experience and ongoing educational requirements, paying membership fees and adherence to ethical guidelines.

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

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

Item 11 Code of Ethics, Client Transactions and Personal Trading

Code of Ethics

Personal investment transactions of representatives of our firm are subject a Code of Ethics that requires such transactions be carried out in a manner consistent with our fiduciary obligations. At the same time, if the investment goals of OFA associates are similar to that of our clients, their portfolios will also tend to mirror clients' holdings.

Old Field Advisors' Code of Ethics ("Code") has been designed to comply with the requirements of Rule 204A-1 of the Investment Advisers Act of 1940. Among other things, the Code covers:

- Prohibited Purchases and Sales,
- Insider Trading,
- Personal Securities Transactions
- Exempted Transactions
- Prohibited Activities
- Conflicts of Interest
- Gifts and Entertainment
- Confidentiality
- Service on a Board of Directors
- Compliance Procedures and Responsibilities.

We require all of our supervised persons to conduct business with the highest level of ethical standards and to comply with all federal and state securities laws at all times. Upon employment or affiliation and at least annually thereafter, all supervised persons will sign an acknowledgement that they have read, understand, and agree to comply with the Code.

Old Field Advisors will provide a copy of its Code of Ethics to a client or prospective client upon request.

Client Transactions and Personal Trading

Our firm and its “related persons” may buy or sell securities similar to, or different from, those we recommend to clients for their accounts. A recommendation made to one client will be different in nature or in timing from a recommendation made to a different client. At no time, however, will our firm or any related party receive preferential treatment over our clients.

To reduce or eliminate certain conflicts of interest involving personal trading, our policy requires that we restrict or prohibit associates’ transaction in specific reportable securities transactions. Any exception or trading pre-clearance must be approved by the principal of the firm in advance of the transaction in an account. The firm will maintain required personal securities transaction records.

Item 12 Brokerage Practices

Selecting and Recommending Custodians

Old Field Advisors is not affiliated with any bank, broker-dealer, or custodian and does not maintain custody of your assets.

When we are engaged to provide *wealth management* services, we require that clients use Schwab Institutional as their custodian. The firm is a third party registered broker-dealers and member of FINRA/SIPC. The qualified custodian will hold client assets in brokerage accounts opened by the client.

Old Field Advisors is independently owned and operated and is not affiliated with either.

Generally, transactions will be executed through your custodian. However, in accordance with our duty of best execution, we can use other brokers to execute trades for your account as described below.

Old Field Advisors seeks to recommend custodians that will hold your assets and execute transactions on terms that are, overall, advantageous when compared with other available providers and their services. We consider a wide range of factors.

For clients’ accounts maintained by the custodians, the custodians are compensated by charging commissions or other fees on trades that they execute or that settle into your custodial account. The commission rates applicable to our client accounts are set by the custodians.

In addition to commissions, custodians may charge a flat dollar amount as a “prime broker” or “trade away” fee for trades executed by a different broker-dealer when the securities bought or the funds from the securities sold are deposited (settled) into your custodial account. Those fees are in addition to the commissions or other compensation you pay the executing broker-dealer.

Soft Dollars

Old Field Advisors receives research and other products or services from the custodians that we recommend. These custodians provide us with access to their institutional trading and custody services, which are typically not available to retail investors. These services generally are available to independent investment advisors at no charge to them so long as the independent investment advisors maintain a minimum amount of assets with the custodians.

Services that we receive include, but are not necessarily limited to: receipt of duplicate client confirmations and bundled duplicate statements; access to their trading desk; access to block trading which provides the ability to aggregate securities transactions and allocate the appropriate shares to client accounts; the ability to have investment advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; and access to mutual funds that generally require significantly higher minimum initial investments or are generally only available to institutional investors.

The custodians also make available to us other products and services that benefit our firm but do not benefit clients' accounts. Some of these other products and services assist us in managing and administering clients' accounts. These include software and other technology that provide access to client account data (such as trade confirmation and account statements); provide research, pricing information and other market data; facilitate payment of the firm's fees from its clients' accounts; and assist with back-office functions; record keeping and client reporting. We also receive other services intended to help our firm manage and further develop our business enterprise. These services include consulting, publications and conferences on practice management, information technology, business succession, regulatory compliance, and marketing.

Our recommendation that you maintain your assets in accounts at these custodians may be based in part on the benefit to us in the availability of some of the foregoing products and services and not solely on the nature, cost or quality of custody and brokerage services provided. This creates a potential conflict of interest.

Item 13 Review of Accounts

Financial Planning projects

Project engagements terminate upon the delivery of the requested plan or advice. Periodic financial check-ups are recommended, but it is the responsibility of the client to initiate such reviews.

Wealth Management Services

Reviews Accounts are reviewed at least quarterly for wealth management clients, by the firm's Principal, Gigi Turbow Marx. Additional account reviews can be triggered or intensified by unexpected performance, shifting market conditions, in-flows/out-flows, or changing client preferences or circumstances.

Reporting Wealth management clients will receive quarterly reports from Old Field Advisors.

These are in addition to the statements that clients receive, at least, quarterly from their custodian. Client should compare Old Field Advisors' reports to statements received from their custodian.

Item 14 Client Referrals and Other Compensation

The firm does not compensate third parties when clients are referred to Old Field Advisors.

As requested or appropriate, Old Field Advisors will provide prospects and clients with referrals to other professionals. The firm considers this to be a component of its fiduciary responsibility and does not accept referral fees or any form of remuneration from other professionals.

The firm and its associates are members of a variety of professional organizations including but not limited to the Garrett Planning Network (Garrett), the National Association of Personal Financial Advisors (NAPFA); Financial Planning Association (FPA), or the Certified Financial Planner Board of Standards, Inc. These entities may provide online search tools to the investing public that allow interested parties (prospective clients) to search for individual participants within a selected state or region. These passive websites may allow interested persons to contact a participant via electronic mail, telephone number, or other contact information to interview the participating member. The public may also choose to telephone association staff to inquire about an individual within their area and receive the same or similar information. A portion of these participant's membership fees may be used so that their name will be listed in some or all these entities' websites (or other listings).

The noted associations do not actively market to prospective clients locating our firm or associates via these methods. Clients who find us in this way do not pay more for their services than clients referred to us in another fashion, such as by another client. We do not pay these entities for prospective client referrals, nor is there a fee-sharing arrangement.

Item 15 Custody

Clients' cash and securities are normally held by the custodians selected by each client, pursuant to separate custody or other agreements. Old Field Advisors does not seek physical possession of the cash or securities in client accounts at any time. We may, however, be *deemed* by regulators to have custody of clients' cash and securities, to the extent that clients grant us the authority to deduct advisory fees directly from their accounts.

Clients will receive account statements directly from the account custodian at least quarterly, but more often monthly. Statements will be sent to the email or postal mailing address that the client provided to the custodian. Clients should review those statements promptly upon receipt. We also urge clients to compare the custodian's account statements to reports received from Old Field Advisors.

Item 16 Investment Discretion

Wealth Management Services

As part of our *Wealth Management* Agreement, clients provide the firm with discretionary trading authority. This discretionary trading authority allows our firm to implement investment decisions, such as the purchase or sale of a security on behalf of your account, without requiring your prior authorization for each transaction. Our trading discretion is limited, however, by the client's IPS.

Item 17 Voting Client Securities

Proxy Votes

Clients are expected to vote their own proxies. When assistance on voting proxies is sought, Old Field Advisors may *advise* clients as requested. We do not vote the proxies on your securities, though. In the unlikely event that a conflict of interest exists, it will be disclosed to the client as timely as practicable.

Item 18 Financial Information

Old Field Advisors does not require or solicit the prepayment of more than \$1,200 in fees six months or more in advance. Old Field Advisors is not aware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments to clients.



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April, 2024

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Please contact us at 631-751-7230 or info@oldfieldadvisors.com if you have any questions about the contents of this supplement.

Additional information about **Gigi Turbow Marx, CRD #: 1256206** is available on the SEC's website at www.adviserinfo.sec.gov

Gigi Turbow Marx, MBA, RICP®

Managing Principal

Item 2 Educational Background and Business Experience

B.A. Economics, University of Michigan, 1975

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

Ms. Turbow Marx has worked in the capital markets since 1975, with corporate clients and institutional investors as well as individuals. Her prior assignments have included international financial management and currency consulting for corporate clients of Bank of America and Citicorp; investment banking in public (municipal) finance for the former Dean Witter Reynolds (now Morgan Stanley) and Paine Webber (subsequently acquired by UBS); as well as engagements as Director of Investor Relations for two NYSE listed companies. Prior to founding Old Field Advisors, she traded exchange listed options.

Ms. Turbow Marx previously held the Series 7 and 63 registrations, has completed the Series 65 examination for investment advisors and maintains the *Retirement Income Certified Professional* (RICP®) ¹ designation. She is the founding principal of Old Field Advisors.

Item 3 Disciplinary Information

Ms. Turbow Marx has nothing to disclose regarding any legal or disciplinary events material to a client's evaluation of her integrity.

Item 4 Other Business Activities

As noted in Item 10 of the brochure, Old Field Advisors is a member of a professional financial planning network known as the Garrett Planning Network and may partner with other members of that network to provide specialized expertise to the firm's clients, as appropriate.

Item 5 Additional Compensation

Except as otherwise described in Item 12 of the brochure, Ms. Turbow Marx does not receive any economic benefit from any non-advisory client.

Item 6 Supervision

Ms. Turbow Marx serves in multiple capacities with the firm including Managing Member, Firm Principal, Data Security Officer, and Investment Adviser Representative. The firm recognizes that not having all organizational duties segregated creates a conflict of interest; however, the firm employs policies and procedures to ensure timely, accurate record keeping and supervision. Certain functions may be outsourced to assist in these efforts when or as necessary.

Questions regarding the firm, staff, its services, or this ADV Part 2 may be made to the attention of Ms. Turbow Marx at (631) 751-7230.

¹ The **Retirement Income Certified Professional (RICP®) designation** requires three (3) years of professional experience, the equivalent of nine (9) semester credit hours, and a final, closed-book, proctored examination. Upon attaining this designation, the holder is required to complete 15 hours of continuing education every two years.

Privacy Policy

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

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

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

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

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

Within the firm, access to client information is limited to those who need it to complete their work. We maintain physical, electronic, and procedural safeguards to protect your data and privacy. In addition, all employees, sub-contractors, and officers sign contracts binding them to handle all client material as private and confidential. .

We do not discuss a client's situation with anyone else requesting information about an account unless specifically authorized, in writing, to do so. This extends, for example, to providing information to a husband on his wife's IRA account or a son or daughter about their parents' accounts, etc.

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