



# Ocean View Advisory

BROCHURE  
ADV PART 2A

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## Item 1: COVER PAGE

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Ocean View Advisory  
35227 Seagrass Plantation Lane  
Dagsboro, DE 19939  
410-216-0081

Brochure, dated May 30, 2018

This Brochure provides information about the qualifications and business practices of Jay Middleton Inc., DBA Ocean View Advisory. If you have any questions about the contents of this Brochure, please contact us at 410-216-0081 and/or email [llessey@oceanviewadvisory.com](mailto:llessey@oceanviewadvisory.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.

Ocean View Advisory is registered in the states of Delaware, Maryland and Texas. It also maintains clients in several states where it qualifies for an exemption or exclusion from registration pursuant to *de minimus* rules. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about Ocean View Advisory is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov) and on the firm's website at [www.oceanviewadvisory.com](http://www.oceanviewadvisory.com).



# Ocean View Advisory

## BROCHURE ADV PART 2A

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### Item 2: MATERIAL CHANGES

This item will discuss the specific material changes that have been made to the Brochure since the last annual or interim update in order to provide you with a summary of such changes.

We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We may further provide other ongoing disclosure information about material changes as necessary.

We will further provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Currently, a copy of our complete Brochure may be requested by contacting Colin Middleton, Client Services, at 410-216-0081 or [cmiddleton@oceanviewadvisory.com](mailto:cmiddleton@oceanviewadvisory.com) or the Chief Compliance Officer, Linda Lessey, by email at [llessey@oceanviewadvisory.com](mailto:llessey@oceanviewadvisory.com)

Additional information about Ocean View Advisory shall also be available via the SEC's website [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The SEC's website also provides information about any persons affiliated with Ocean View Advisory who are registered, (i.e., Jay C. Middleton, ChFC) or are required to be registered, as investment adviser representatives of Ocean View Advisory.

### **Summary of Material Changes since the previous Annual Update/Amendment:**

The firm plans to withdraw from registration with the Securities and Exchange Commission and make application to the aforementioned states directly; therefore, it has amended its registration information.

Item 5: The firm no longer offers Comprehensive Financial Planning engagements. Planning services for investment management clients has been updated.

Item 12: Language has been added to clarify the firm's use of other brokers to effect certain securities transactions.

Item 14: Language has been added to clarify the registration requirements of a compensated Solicitor, in the event the firm receives an outside referral.

Item 17: Language has been added regarding proxy and other investment-related notifications.



# Ocean View Advisory

## BROCHURE ADV PART 2A

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### Item 3: TABLE OF CONTENTS

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Item 1: COVER PAGE .....	i
Item 2: MATERIAL CHANGES .....	ii
Item 3: TABLE OF CONTENTS .....	iii
Item 4: ADVISORY BUSINESS .....	1
Item 5: FEES AND COMPENSATION .....	3
Item 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT .....	4
Item 7: TYPES OF CLIENTS .....	4
Item 8: METHODS OF ANALYSIS, STRATEGIES, AND RISK OF LOSS .....	4
Item 9: DISCIPLINARY INFORMATION .....	6
Item 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS .....	6
Item 11: CODE OF ETHICS .....	6
Item 12: BROKERAGE PRACTICES .....	7
Item 13: REVIEW OF ACCOUNTS .....	10
Item 14: CLIENT REFERRALS AND OTHER COMPENSATION .....	10
Item 15: CUSTODY .....	11
Item 16: INVESTMENT DISCRETION .....	11
Item 17: VOTING CLIENT SECURITIES .....	11
Item 18: FINANCIAL INFORMATION .....	11
Item 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS .....	12
<b>BROCHURE SUPPLEMENT (2B)</b> .....	13
Item 2: EDUCATION BACKGROUND AND BUSINESS EXPERIENCE .....	14
Item 3: DISCIPLINARY INFORMATION .....	14
Item 4: OTHER BUSINESS ACTIVITIES .....	14
Item 5: ADDITIONAL COMPENSATION .....	14
Item 6: SUPERVISION .....	14
Item 7: STATE-REGISTERED ADVISORS .....	14
Item 2: EDUCATION BACKGROUND AND BUSINESS EXPERIENCE .....	15
Item 3: DISCIPLINARY INFORMATION .....	15
Item 4: OTHER BUSINESS ACTIVITIES .....	15
Item 5: ADDITIONAL COMPENSATION .....	15
Item 6: SUPERVISION .....	15
Item 7: STATE-REGISTERED ADVISORS .....	15

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**Item 4: ADVISORY BUSINESS**

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**The Firm**

Ocean View Advisory, (referred to also as "the Company," "the Adviser," or "Ocean View," is an investment advisory firm founded by Jay Middleton, ChFC as an independent Registered Investment Advisor. The Company offers fiduciary advice in the areas of investments and planning. We provide clients with discretionary investment advice and planning, including asset allocation services, based on your stated objectives, needs, risk tolerance and desired management style. Planning includes retirement planning, financial planning, education funding, and financial review as part of the Ocean View Advisory investment management process. Occasionally, the firm gives advice on risk management, cash flow management and the acquisition, retention and/or liquidation of non-security type assets. Because risk management is often part of the financial portfolio strategic planning process, the firm offers insurance and fringe benefits consulting which may lead to referrals to unaffiliated insurance providers, as decisions regarding these issues must often be decided upon before an investment strategy can be implemented.

**Discretionary Managed Account Program**

After a thorough fact-finding consultation where your current assets and liabilities are listed and goals and objectives are defined, we will advise you as to which types of investments are appropriate to accomplish your stated objectives. We carefully consider the time frame of your goals, your risk tolerance, the general outlook of the economy and the current investment markets. We offer customized portfolios, depending on your individual investment style profile as determined by your responses in interviews and/or on written questionnaires. The firm provides research and initial asset allocation services to establish a diversified portfolio based on your stated objectives. Subsequently, we monitor the investments and rebalance your portfolio as necessary or when there is any change in your objectives. Our service also includes quarterly reports provided electronically (unless you elect to receive paper reports) and updating meetings annually, or upon request.

For continuous active asset management, the firm is given discretionary trading authority by the client. This allows the firm to buy or sell securities within your account(s) as well as specify the amount of securities to invest, without first obtaining your specific consent. This consent is limited only by the presence or absence of margin features and the approved level of options trading on the account(s). You may, at any time, elect to place restrictions on the purchase or sale of certain securities. For instance, you may ask us to buy (or not to buy) certain securities, or you may ask us not to sell certain holdings already owned that you wish to retain. We do not, as a rule, research or monitor those investments that have not been specifically recommended by the firm. You will be ultimately responsible for monitoring client restricted investments although we will assist you on request.

**Participant-Directed Account Program for 401(k) Retirement Plans**

For business owners, we can recommend the use of pension plan programs as a benefit for you and your employees. The firm can recommend various third party administrators (TPAs) and/or custodians for your plan. Considerations are based on various factors, including the type of plan required, and the services and costs associated with the plan. Like the Discretionary Managed Account Program described above, we can provide research and asset allocation services to design diversified portfolios based on your and your participants' stated objectives. We also provide you and your participants the training required to set up your accounts for automatic investment of your contributions. Subsequently, we monitor the investments and keep you informed of any recommended changes. The service also includes annual meetings for you and your participants.

The firm is not an affiliate of, nor does it receive economic benefit from any TPA or Pension Plan custodian; the firm will only recommend a TPA and/or Plan custodian based on your stated goals and objectives, and the opinion that the program will best fulfill your particular need. If a program is recommended, you are responsible for reviewing the program's documents and disclosures before making a decision to invest. The firm will not have discretionary trading authority for accounts in the program and participants will be responsible for following or not following the advice given and making the recommended investment trades.

**Please Note: Retirement Rollovers-Potential for Conflict of Interest:** A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If the Company recommends that a client roll over his/her retirement plan assets into an account to be managed by Ocean View, such a recommendation creates a conflict of interest if Ocean View will earn an advisory fee on the rolled over assets. When acting in such capacity, Ocean View serves as a fiduciary under the Employee Retirement Income Security Act (ERISA). No client is under any obligation to rollover retirement plan assets to an account managed by Ocean View. Ocean View's Chief Compliance Officer, Linda Lessey, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.

**Assets Under Management** *(rounded to the nearest 1000)*

As of April 30, 2018, the firm had

\$53,336,000.00	in Discretionary Managed Client Accounts
<u>662,000.00</u>	in non-Discretionary Managed Client Accounts
<b>\$53,998,000.00</b>	<b>Total Assets under Management</b>

**Financial Planning**

We offer financial planning as an adjunct to the managed account programs for our asset management clients. Upon request, the firm can provide:

- Analysis of existing assets outside the firm's management
- Estate administration assistance
- Retirement and education funding projections
- Retirement plan analysis
- Risk analysis

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**Item 5: FEES AND COMPENSATION**

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**Investment Management Fees**

The firm charges advisory fees for discretionary account management based on a percentage of the market value of the account assets at the end of each quarter and billed in arrears, as follows:

<u>Total Managed Portfolio Assets</u>	<u>Annual Percentage Charged</u>
up to \$500,000.00	1.00%
From \$500,000.01 to \$1,000,000	0.75%
From \$1,000,000.01	0.50%

Fees are adjusted for capital additions and withdrawals. Unless otherwise noted by agreement, the fees will be billed directly to your accounts.

Fees are subject to negotiation. Related accounts may be combined in order to reduce the fee charged. The firm reserves the right to reduce or waive the fee charged on employee, family, or other firm related accounts. The specific manner in which fees are charged is established in your written agreement with us. The firm will generally bill its fees in arrears on a quarterly basis. You may elect to be billed for fees or to authorize us to debit fees directly from your accounts. The firm prorates the fees due for accounts initiated or terminated during a calendar quarter. You have the right to terminate an agreement without penalty within five business days after entering into the agreement.

Fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses. You may incur additional charges imposed by custodians, brokers, and other third party service providers. These may include custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions. Complete descriptions of these fees are contained in the separate agreements and/or ADV Brochures of the relevant managers or administrators.

Ocean View Advisory is a **fee-only advisory firm**, i.e., it does not sell investment products for commissions. The firm recommends only no- and low-load mutual funds and ETFs as well as direct equities. You should be aware that these funds charge internal management fees, which are disclosed in the fund prospectus. Clients owning variable annuities should also be aware of Mortality and Expense fees charged by these investments and disclosed in the annuity prospectus. Certain mutual funds and variable annuities may charge contingent deferred sales charges (CDSC) on withdrawals. These charges, fees and commissions are exclusive of and in addition to the firm's fee, and we do not receive any portion of these commissions, fees, and costs.

See Brokerage Practices, which further describes the factors that the firm considers in selecting or recommending broker-dealers for client transactions and determining the reasonableness of their compensation (e.g., commissions).

### **Refund Policy and Termination**

If you wish to terminate your arrangement with the firm, notification to the Company in writing is required. For advisory agreements terminated within five (5) business days from the date of inception, no fees will be charged. For management fees billed in arrears, you will be billed pro rata for that current quarter up to the date of receipt of written notification.

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### **Item 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

The firm does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

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### **Item 7: TYPES OF CLIENTS**

The firm primarily provides investment management and planning to individuals, closely held corporations, retirement plans, estates, trusts, and Charitable Foundations.

For discretionary asset management, the minimum new client household investment account is \$500,000.00. (There is no minimum account size for Employee Plan 401(k) individual participant accounts).

Household accounts are combined for the purpose of meeting the above minimums. We reserve the right to make exceptions to the published minimum account size for whatever reason we deem appropriate.

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### **Item 8: METHODS OF ANALYSIS, STRATEGIES, AND RISK OF LOSS**

The firm primarily uses fundamental analysis (analyzing the company) as a method of security analysis, with a secondary focus on technical analysis (analyzing the marketplace). The primary sources of information used for evaluation include VectorVest , TradeStops, Stansberry Research, and Riskalyze.

The firm uses the following strategies to help you reach your investment goals. Each of these strategies carries a degree of risk. Most client portfolios are invested in a diversified blend of these strategies. The choice of blend is based on your stated goals and tolerance for risk. A specific allocation can vary with market conditions, additions or withdrawals. Target percentages for each strategy are determined by the Advisor and serve as a general guideline.

**Growth Opportunities Strategy** – identifies those growth stocks and ETFs which, in the view of the firm, have the best potential for appreciation without undue risk. The firm uses Tradestops signals to help avoid undue losses in a downturn.

*There is risk that these investments may lose value due to unfavorable economic conditions, market volatility, and rising interest rates. The companies themselves may experience reduced earnings, missed expectations and other unexpected circumstances causing loss of value.*

**Income Opportunities Strategy** – includes investment in bonds and bond funds, high dividend stocks, preferred stocks, MLPs, REITS and other income producing securities.

*The risks to these investments include rising interest rates, large declines in equity markets, market illiquidity, dividend reductions, and default. Despite a focus on bonds of high quality and relatively short-maturities, there is still risk of loss. Low rates of interest can result in loss when fees exceed the return on cash equivalent investments. Inflation may devalue the assets. Persistent declines in the housing market may result in downgrading of government mortgage-backed bonds.*

**Capital Preservation Strategy** – invests in insured and highly rated, short-term (3 months to 3 years) fixed income instruments. This strategy is suitable for investors who need their funds for spending in the near future or want to dampen their stock and bond risk and volatility.

*Despite a focus on insured instruments of high quality and relatively short-maturities, there is still risk of loss. Low rates of interest can result in loss when fees exceed the return on cash equivalent investments. Inflation may also devalue the assets.*

**Broad Based Strategy** – It is not unusual for a client relationship to include a small account, say for a Roth IRA or an account for a child. To provide proper diversification within a small account, broad based equity funds are used rather than individual securities.

*As with the other strategies, there is risk that these investments may lose value due to unfavorable economic conditions, market volatility, and rising interest rates. The underlying companies may experience reduced earnings, missed expectations and other unexpected circumstances causing loss of value.*



You are urged to carefully consider your choice of portfolio for long-term investment goals. Changes are always possible, but involve their own risks in increased trading costs and possible losses due to bad timing of the sales or purchases necessary to change portfolio design.

For all strategies, the firm will primarily use no- to low-load mutual funds and ETFs to achieve diversification among asset classes and sectors. For larger accounts, a limited number of securities including but not limited to individual stocks and ETFs (Exchange-traded funds) may be added. For larger portfolios, individual bonds may supplement bond mutual funds.

In all cases, you should be aware that investing in securities involves risk of loss that you should be prepared to bear. No investment strategy provides a guarantee against the risk of possible losses.

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#### Item 9: DISCIPLINARY INFORMATION

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to client evaluation of the firm or the integrity of the firm's management. The firm has no information applicable to this Item.

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#### Item 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS

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Ocean View Advisory is an independent advisory firm not affiliated with any broker-dealer. As part of its planning services, the Advisor may refer clients to outside professionals, including attorneys and insurance professionals, from whom it receives no compensation.

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#### Item 11: CODE OF ETHICS

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The firm maintains a written Code of Ethics outlining the policies and procedures to be followed by officers and staff to assure that the firm's high standards of business conduct are met. It is our policy that any person employed by the Company is prohibited from profiting at the expense of a client. Clients may not necessarily be recommended the same investments made by the firm owners or its employees if those investments are deemed by the advisor unsuitable for the client. However, owners and employees may buy or sell for their own accounts the same investment products recommended to clients. To avoid potential conflicts of interest however, the Company invokes a blackout period; i.e., owners and staff may not place individual trades within 2 business days of client transactions in the same security.\* Rather, they must participate in client trades as part of a block trade. When several clients, or clients and employees, are participating in the same equity trade, Company policy is to submit block trades which are then allocated equally as to price among the participants. (Each trade is treated as a separate transaction for the purpose of calculating brokerage commissions.)

*\*Certain securities, such as Mutual funds and CDs are exempt from this policy.*

Transactions are usually conducted in widely held and heavily traded securities; thus transactions will not usually have an effect on market prices. Should an associated person of the firm ever choose to purchase or sell a security which is thinly traded at the same time as a client of the firm, the transactions will be entered in such a way as to make sure that if either party would be at an advantage, it will be done so that the client will be the advantaged party.

A copy of the firm's Code of Ethics may be requested by contacting the Chief Compliance Officer, Linda Lessey.

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#### Item 12: BROKERAGE PRACTICES

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The firm is independently owned and operated, and is neither registered as, nor affiliated with, a broker/dealer and does not maintain custody of the client's funds or securities (see Item 15). When the recommendations of the Adviser involve the purchase or sale of investment products, the transactions must be effected through a custodian and brokerage firm. Most investments are made through a broker offering discounted commissions on trades and no-load, no-transaction-fee, mutual funds. The reasonableness of the commission is based on the broker's ability to provide professional services, competitive commission rates, research and other services that will help the firm in providing investment management services to you. Therefore, the firm will recommend a broker/dealer who provides useful research and securities transaction services even though a lower commission may be charged by another broker/dealer, who offers no research services and minimal transaction assistance. Therefore, the firm will assist you with developing a relationship with a broker/custodian that the Advisor has a relationship with, including but not limited to Charles Schwab & Co., ("the custodian"). The firm recommends that you establish brokerage with a FINRA-registered broker-dealer, member SIPC, to maintain custody of your assets and to effect trades for your accounts. The firm does not however have discretion over the choice of the custodian of your accounts. Although the firm may recommend Charles Schwab & Co. as a custodian, it is ultimately your decision where to custody assets.

The custodian provides the firm with access to its institutional trading and custody services, which are typically not available to retail investors. These services are not contingent upon the firm committing to the custodian any specific amount of business (assets in custody or trading commissions). Brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment. Research obtained may be used in servicing all our clients.

For client accounts maintained in their custody, C. Schwab does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through the brokerage or that settle into the accounts. For transactions executed away from the custodian through Prime Broker or Trade Away arrangements, the custodian charges a separate fee per transaction or allocation in addition to any commission or markup that may be charged by the broker. For directed brokerage accounts, clients are urged to request disclosure of additional charges, if any, from their broker.

The custodian also makes available to the firm other products and services that benefit the firm but may not directly benefit its clients' accounts. Many of these products and services may be used to service all or some substantial number of the firm's accounts, including accounts maintained at other brokerages.

Brokerage products and services that assist the firm in managing and administering client accounts include software and other technology that (i) provide access to client account data (such as trade confirmations and account statements); (ii) facilitate trade execution and allocate aggregated trade orders for multiple client accounts; (iii) provide research, pricing and other market data; (iv) facilitate payment of the firm's fees from its clients' accounts; and (v) assist with back-office functions, recordkeeping and client reporting.

The custodian also offers other services intended to help the firm manage and further develop its business enterprise. These services may include: (i) compliance, legal and business consulting; (ii) publications and conferences on practice management and business succession; and (iii) access to employee benefits providers, human capital consultants and insurance providers. The custodian may make available, arrange and/or pay third-party vendors for the types of services rendered to the firm. The custodian may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to the firm. The custodian may also provide other benefits such as educational events or occasional business entertainment of firm personnel. In evaluating whether to recommend or require that clients custody their assets at a custodian, the firm may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors it considers and not solely the nature, cost or quality of custody and brokerage services provided by the custodian, which may create a potential conflict of interest.

The firm participates in the institutional advisor program (the "Program") operated by Schwab Advisor Services ("Schwab") a division of Charles Schwab & Co. Schwab is an unaffiliated FINRA-registered broker-dealer, member SIPC. Schwab offers to independent investment advisors services that include custody of securities, trade execution, clearance and settlement of transactions. Advisor receives some benefits from Schwab through its participation in the Program.

As disclosed above, the firm participates in Schwab's institutional customer program and recommends it to clients for custody and brokerage services. There is no direct link between the firm's participation in the program and the investment advice it gives to its clients, although advisor receives economic benefits through its participation in the program that are typically not available to Schwab retail investors. These benefits include the following products and services (provided without cost or at a discount): A dedicated trading desk that services the Advisor's clients, a dedicated service group and an account service manager dedicated to the Advisor's accounts, access to a real time order matching system, electronic download of trades, receipt of duplicate and batched client statements, confirmations and year-end summaries; research related products and tools; consulting services; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees directly debited from client accounts (in accordance with federal and state requirements; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to Advisor by third party vendors), and the ability to have custody fees waived.

Some of the products and services made available by Schwab through its program may benefit Advisor but may not benefit its client accounts. These products or services may assist Advisor in managing and administering client accounts, including accounts not maintained at Schwab. Other services made available by the custodian are intended to help Advisor manage and further develop its business enterprise. The benefits received by Advisor or its personnel through participation in such programs do not depend on the amount of brokerage transactions directed to the custodian. As part of its fiduciary duties to clients, Advisor endeavors at all times to put the interests of its clients first. You should be aware, however, that the receipt of economic benefits by Advisor or its related persons in and of itself creates a potential conflict of interest and may indirectly influence the Advisor's choice of one custodian over another for custody and brokerage services.

The firm does not have discretion in choosing the broker with whom you custody your accounts, however when the firm has discretionary authority to trade in clients' accounts, the firm may from time to time use brokers other than the custodian to carry out those trades. For example, when clients' assets are custodied at C. Schwab & Co, the firm will most often execute trades through that firm. However, the firm may on occasion use other brokerages to trade securities in accounts approved for Prime Broker or when "trading away." The Advisor will trade away when it deems you will benefit from better execution and/or service through another brokerage. In certain instances the Advisor may execute over the counter securities transactions on an agency basis, which may result in advisory clients incurring two transaction costs for a single trade: a commission paid to the executing broker/dealer plus the market makers mark-up or mark-down.

When possible, the firm makes use of block trading to assure that each client receives the same price on a trade. When clients participate in block trades, each trade is treated by the broker as a separate transaction for the purpose of calculating brokerage commissions. *A client who directs the firm to use a custodian/broker/dealer other than Schwab, is ineligible to participate in block trades and therefore may not receive the same execution as to commissions and price as other clients.* Furthermore, block trades executed at one broker may not receive the same price and execution as block trades executed at another broker.

Although the broker sets the commission rates on trades, these may differ from client to client and may be based on several factors, including but not limited to your portfolio size and whether or not you accept electronic confirmations and statements. Occasionally the firm may arrange an agency cross transaction between advisory clients when one client wishes to sell and another wishes to buy the same security and when, in the Advisor's opinion, both clients may achieve better price and/or execution by avoiding the open marketplace. The firm does not act as broker and receives no compensation in facilitating such transactions.

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#### Item 13: REVIEW OF ACCOUNTS

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Meetings include reviews of accounts and are offered on an annual basis or more frequently should you so request. Meetings are conducted by Jay Middleton, ChFC, and may be in person or by Skype or other electronic means. Accounts may be reviewed outside of client meetings more frequently than annually, such as when market conditions change, when rebalancing becomes necessary, when securities are bought or sold, when your objectives change, or for other reasons

For asset management programs, you are provided reports and transaction confirmations by the custodian at least quarterly. Statements include, among other information, a listing of all investments in your accounts, current valuation and transaction listings for the period.

The firm provides asset management clients with at least quarterly account reports that include a performance review. Realized gains and losses reports are provided by request for income tax purposes. You may receive the custodian's reports electronically or may opt-out of electronic reporting and receive paper reports at least quarterly.

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#### Item 14: CLIENT REFERRALS AND OTHER COMPENSATION

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At this time the firm has no arrangements to compensate other parties (i.e. "solicitors") for client referrals. However, the firm may enter into such an arrangement pursuant to the provisions of Rule 206(4)-3 promulgated under the Advisers Act whereby those parties act as a solicitor for the Company and under which program a representative of such party (the "Solicitor") may offer our advisory services. Through such an arrangement the Solicitor is not an employee of the company but, by written agreement,

would receive compensation based on a percentage of the total advisory fee. A Solicitor must be properly registered as an Investment Advisor Representative unless expressly exempt from registration requirements. If applicable, this information would be disclosed to you prior to entering into an investment advisory agreement with us.

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**Item 15: CUSTODY**

Under government regulations, we are deemed to have custody of your assets if you authorize us to instruct C. Schwab & Co., or other custodian, to deduct our advisory fees from your accounts. The custodian maintains actual custody of your assets. You will receive account statements directly from the custodian at least quarterly. They will be sent to the email or postal address you provided to the broker dealer. We urge you to carefully review these statements and compare such official custodial records to any account statements that we provide. Our statements may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

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**Item 16: INVESTMENT DISCRETION**

The firm usually receives discretionary authority from you at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular client account. When selecting securities and determining amounts, we observe the investment policies, limitations and restrictions of the clients we advise. Investment guidelines and restrictions must be provided to us in writing.

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**Item 17: VOTING CLIENT SECURITIES**

In addition to other information, such as trade confirmations, you will receive proxy voting information from Schwab. If you choose another brokerage you may wish to inquire as to their policy regarding proxy voting notifications. As a matter of firm policy and practice, the firm does not have any authority to and does not vote proxies on behalf of advisory clients. You retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. We may provide advice to clients regarding the clients' voting of proxies if requested.

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**Item 18: FINANCIAL INFORMATION**

Registered investment advisers are required to provide you with certain financial information or disclosures about the Company's financial condition. The firm has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients, and has not been the subject of a bankruptcy proceeding. In addition, the Advisor complies with at least the minimum net worth requirements of the state(s) in which it is registered.

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Item 19: REQUIREMENTS FOR STATE-REGISTERED ADVISERS

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(A-D)

The Chief Executive Officer and Principal of the firm is Jay C. Middleton, ChFC. Mr. Middleton is registered as an Investment Advisor Representative in the states of Delaware, Maryland, and Texas.

The Chief Compliance Officer and Partner of the firm is Linda E. Lessey. Ms Lessey is registered as an Investment Advisor Representative in the state of Maryland.

A complete summary of their education and business background, and other pertinent disclosures can be found in the following Part 2B supplement to this Brochure.

(E) Per Item 10 above, no persons in the firm are affiliated with any brokerage firm or issuers of securities.

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BROCHURE SUPPLEMENT (Part 2B)

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Ocean View Advisory  
35227 Seagrass Plantation Lane  
Dagsboro, DE 19939

Brochure Supplement

This brochure supplement provides information that supplements the Ocean View Advisory Brochure and is addended thereto. Please contact Linda Lessey, CCO at [llessey@oceanviewadvisory.com](mailto:llessey@oceanviewadvisory.com) if you did not receive the firm's brochure or if you have any questions about the contents of this supplement.

Additional information about Ocean View Advisory is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).



**Jay C. Middleton, ChFC®**  
**Principal**

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**Item 2 (19A): EDUCATION BACKGROUND AND BUSINESS EXPERIENCE**

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Jay C. Middleton (b 1954) is a Business Administration graduate of Roanoke College. He was conferred as a Chartered Financial Consultant (ChFC®) by the American College, Bryn Mawr, Pennsylvania, in 1985. Mr. Middleton was an investment broker until 1988 when he founded Jay Middleton Advisory, a fee-based investment advisory firm. The firm was reestablished as Middleton Gardiner Group, LLC in 2003 as a full-service fee-only financial advisory firm. The name of the firm was changed to 1 North Wealth Services, LLC after the purchase of the ownership of Gardiner & Appel, Inc. As President of Jay Middleton Inc., Mr. Middleton remained a Partner of the firm until December 31, 2017 at which time he sold his remaining interest in 1NWS to his Partner, James E. Brennan. Subsequently, Mr. Middleton established Jay Middleton Inc., dba Ocean View Advisory as a new RIA and is Principal of the firm.

To receive his ChFC® designation, Mr. Middleton was required to complete 10 courses in the Financial Services program, meet experience requirements and ethics standards, and agree to comply with the American College Code of Ethics and Procedures. The ChFC® provides comprehensive coverage of the key financial planning disciplines, including insurance, income taxation, retirement planning, investments, and estate planning. The ChFC® requires 3 years of experience in client service and related management.

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**Item 3 (19D): DISCIPLINARY INFORMATION**

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to client evaluation of each supervised person providing investment advice. Jay C. Middleton has not had any disciplinary disclosures to be reported; therefore, there is no information applicable to this item.

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**Item 4 (19B): OTHER BUSINESS ACTIVITIES**

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Jay C. Middleton is not actively engaged in any other investment related business or occupation.

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**Item 5: ADDITIONAL COMPENSATION**

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As of 2018, Jay C. Middleton receives compensation for providing advisory services solely from his responsibilities at Ocean View Advisory.

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**Item 6: SUPERVISION**

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Jay C. Middleton is supervised by the CCO of the firm, Linda Lessey. Ms Lessey is responsible for ensuring that Jay Middleton adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual.

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**Item 7: STATE-REGISTERED ADVISORS**

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- A. Jay Middleton has never been involved in an arbitration proceeding or a civil, self-regulatory, or administrative proceeding.
- B. Jay Middleton has never been the subject of a bankruptcy petition.

**Linda E Lessey**  
**Chief Compliance Officer**

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**Item 2 (19A): EDUCATION BACKGROUND AND BUSINESS EXPERIENCE**

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Linda Lessey (b 1945) is a Partner in Jay Middleton Inc. (JMI) and CCO of Ocean View Advisory. She is a graduate of Vassar College and received a Master's degree from The Juilliard School. Ms. Lessey began her financial services career as Office Manager for Jay Middleton Advisory, LLC in 1995, and received a Series 65 license in 1999. She remained with the firm as CCO through its transition to Middleton Gardiner Group, LLC and then 1 North Wealth Services (1NWS), until the sale of JMI's interest in 1NWS.

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**Item 3 (19D): DISCIPLINARY INFORMATION**

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Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to client evaluation of each supervised person providing investment advice. Linda Lessey has not had any disciplinary disclosures to be reported; therefore, there is no information applicable to this item.

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**Item 4 (19B): OTHER BUSINESS ACTIVITIES**

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Linda Lessey is not currently actively engaged in any other investment related business or occupation.

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**Item 5: ADDITIONAL COMPENSATION**

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As of 2018, Linda Lessey receives compensation solely from her responsibilities at Ocean View Advisory.

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**Item 6: SUPERVISION**

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Ms. Lessey primarily supervises the activities of the firm and firm personnel and is responsible for assuring the firm's regulatory compliance. She is supervised by the Principal of the firm, Jay Middleton. Mr. Middleton is responsible for ensuring that Linda Lessey adheres to all required regulations regarding the activities of an Investment Adviser Representative, as well as all policies and procedures outlined in the firm's Code of Ethics and compliance manual. The phone number for Jay Middleton is 443-306-7461.

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**Item 7: STATE-REGISTERED ADVISORS**

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- A. Linda Lessey has never been involved in an arbitration proceeding or a civil, self-regulatory, or administrative proceeding.
- B. Linda Lessey has never been the subject of a bankruptcy petition.