

**Item 1 – Cover Page**

**ADV Part 2 A**

**CUMBERLAND ADVISORS®**

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Revised 09/15/2015

This brochure provides information about the qualifications and business practices of Cumberland Advisors Inc. (Cumberland Advisors®). If you have any questions about the contents of this brochure, please contact us at 800-257-7013, extension 315. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission (the “SEC”) or by any state securities authority.

Cumberland Advisors is a registered investment adviser. Registration of an investment adviser does not imply any level of skill or training.

Additional information about Cumberland Advisors is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). In addition, the SEC’s website provides information about any persons affiliated with Cumberland Advisors who are registered, or required to be registered, as investment adviser representatives.

[Please review this information and acknowledge receipt of this brochure where and if indicated.]

[If obtaining this brochure electronically, please print a copy and retain it for your future reference.]

## **ITEM 2 – MATERIAL CHANGES**

The following is a summary of material changes which have occurred from March 1, 2014 through March 12, 2015.

## **ITEM 4- ADVISORY BUSINESS**

As of 12/31/14, the firm had \$2.32 billion in assets under management. This included fixed-income accounts (municipal bonds and taxable fixed income securities) as well as equity accounts (using exchange-traded funds only).

As of 12/31/14 Cumberland had (i) discretionary assets under management in the amount of \$2,319,413,358 and (ii) nondiscretionary assets under management of \$3,180,296.

## **ITEM 5- FEES AND COMPENSATION**

*Additional Fee schedules have been added as of 9/15/15. Please see Item 5.*

Effective 3/31/15, new accounts will be subject to the following fee schedules.

<b>Exchange-Traded Fund (ETF) Portfolios (excluding currency hedged)</b>				
<b>Minimum Account Size in Each Investment Style: \$250,000</b>				
First	\$250,000	-	\$1,000,000	100 basis points (1%)
Next	\$1,000,001	-	\$2,000,000	85 basis points (.85 of 1%)
Next	\$2,000,001	-	\$3,000,000	75 basis points (.75 of 1%)
Next	\$3,000,001	-	\$5,000,000	65 basis points (.65 of 1%)
Negotiated fee rate on market value in excess of \$5,000,000				

**Minimum Household Investment Size: \$1,000,000**

<b>International Currency Hedged Exchange-Traded Fund (ETF Portfolios)</b>	
<b>Minimum Account Size \$5,000,000</b>	
\$5,000,000 and over	Negotiable

<b>Fixed Income Portfolios</b>		
<b>Master Limited Partnership (MLP) Portfolios</b>		
<b>Minimum Account Size in Each Investment Style: \$500,000</b>		
First \$500,000	- \$1,000,000	50 basis points (.50 of 1%)
Next \$1,000,001	- \$3,000,000	45 basis points (.45 of 1%)
Next \$3,000,001	- \$5,000,000	40 basis points (.40 of 1%)
Next \$5,000,001	- \$10,000,000	35 basis points (.35 of 1%)
Negotiated fee rate on market value in excess of \$10,000,000		

**Minimum Household Investment Size: \$1,000,000**

<b>Balanced Portfolios</b>		
<b>Minimum Account Size in Each Investment Style: \$500,000</b>		
First \$500,000	- \$1,000,000	100 basis points (1%)
Next \$1,000,001	- \$3,000,000	85 basis points (.85 of 1%)
Next \$3,000,001	- \$5,000,000	75 basis points (.75 of 1%)
Next \$5,000,001	- \$10,000,000	65 basis points (.65 of 1%)
Negotiated fee rate on market value in excess of \$10,000,000		

**Minimum Household Investment Size: \$1,000,000**

<b>Active Bond Passive Equity Portfolios</b>		
Institutional Account	Minimum Account Size \$5,000,000	30 basis points (.30 of 1%)
Individual Account	Minimum Account Size \$1,000,000	50 basis points (.50 of 1%)
Negotiated fee rate on market value in excess of minimum account sizes		

## **ITEM 8 - METHODS OF ANALYSIS, INVESTMENT STRATEGIES, AND RISK OF LOSS**

### **NEW INVESTMENT STYLES**

### ***US Sector Rotation***

This style aims to significantly outperform the S&P 500 by buying and holding the cheapest 40% of sectors each quarter (i.e quarterly rebalancing). At the end of each quarter, we rank the 10 S&P 500 sectors by earnings yield (from highest to lowest), buying and holding the corresponding sector ETFs with the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> highest earnings yields. If a low-ranked sector from the prior quarter ranks in the top 4 in the current quarter, it's a "buy". If a high-ranked sector from the prior quarter falls out of the top 4 in the current quarter, it's a "sell".

### ***Strategic Commodity***

The strategy seeks to enable investors to generate investment appreciation through dynamic capital allocation of commodity Exchanged-Traded Funds (ETFs) and Exchanged-Traded Notes (ETNs). At times the portfolio will utilize inverse ETFs/ETNs that are designed to benefit from a decline in value of the underlying asset. With global concerns rising regarding environment hazards, the scarcity of water, climate change, geopolitical unrest and over population, commodity ETFs/ETNs have developed into a separate asset class, therefore providing an alternative to investors looking to diversify their traditional asset classes, such as equities and bonds. With the assistance of the sub-advisor, Cumberland Advisors will provide asset allocation at their discretion

### ***International Currency Hedged Exchange Traded Fund (ETF) Portfolio***

The portfolio style is ideal for US investors who are looking to minimize the erosion of international (non-US) investment gains due to currency conversions in a strengthening US dollar scenario. Any currency-hedged ETF can be included in the investment selection for the portfolio. This includes any start-up ETFs or any country-, region-, or sector-hedged ETFs that focus on investments outside the US.

*For more information on these styles please see Section 8 of complete ADV Part 2A (attached).*

## **ITEM 11 – CODE OF ETHICS**

Employee personal trading rules have been revised to allow employee trades to take place the same day as managed trading after all managed account trading has been completed.

*For more information please see Section 11 of complete ADV Part 2A (attached).*

### **PART 2 B**

Kelli Hill left the firm effective 7/3/2014

DonnaMarie Valles became a Portfolio Manager in December 2014.

Robert R. Malvenda joined the firm as Vice President and Portfolio Manager in October, 2014.

Daniel Himmelberger and Shaun Burgess became Portfolio Managers in March 2015.

*For more information on Ms. Valles, Mr. Himmelberger, Mr. Burgess and Mr. Malvenda, please see ADV, Part 2B, attached.*

In the past, we have offered or delivered information about our qualifications and business practices to our clients on at least an annual basis. Under the new SEC rules, we will provide clients with a summary of any material changes to subsequent brochures within 120 days of the end of our fiscal year. We will also provide ongoing disclosure about material changes, as necessary.

Clients and prospective clients may obtain a copy of the entire brochure, free of charge, by contacting Therese M. Pantalone, Managing Director and Compliance Officer, at 800-257-7013 ext. 315; or by visiting our website [www.cumber.com](http://www.cumber.com).

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## **ITEM 4 – ADVISORY BUSINESS**

Cumberland Advisors is a registered investment advisory firm headquartered in Sarasota, FL (with a branch office in Vineland, NJ). Originally founded in 1973, the firm has clients in approximately 49 states, the District of Columbia, and several foreign countries. The firm has a wealth-preservation bias and conservative investment orientation to manage risks as well as returns.

The firm is wholly owned by senior management employees, with David R. Kotok being the majority shareholder.

As of 12/31/14, the firm had assets under management of \$2.32 billion. This included fixed income accounts (municipal bond and taxable fixed-income securities) as well as equity accounts (using exchange-traded funds only). Our clients include high net worth individuals, institutions, public and corporate retirement plans, corporations, foundations and government entities (direct clients as well as managed money through financial advisors). For most investment styles, our stated minimum “household” account size is \$1,000,000, with account sizes that range up to multi-digit millions.

Cumberland has numerous investment styles to meet individual client needs. Please see Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss, for information on these styles.

Our portfolio management emphasizes long-lasting relationships. Cumberland tailors its advisory services to individual clients’ needs and objectives by having continuous personalized discussions among clients, their consultants, tax advisors, and the assigned portfolio management contact at Cumberland. Clients may impose cash restrictions and asset allocation restrictions.

Cumberland Advisors also provides financial advisory and consulting services to state and local governments and furnishes advice with respect to investments on a non-managed, non-discretionary basis. This advice is provided through consulting agreements with state and local governmental units for special-purpose funds, including reserves or

pension funds. Consulting services are usually provided to individuals or institutions where investment advice is provided to the client and acted upon by the client, rather than at the discretion of Cumberland. The largest single fund currently was approximately \$778 million as of 12/31/2014.

Cumberland also provides external credit analysis, and assists with credits reviews through consulting arrangements with banks.

In addition, Cumberland is registered with the Municipal Securities Rulemaking Board (MSRB) as a Municipal Advisor and assists state and local governments with interest-rate forecasting, financial market analysis, and issuance of debt financing, economic analysis, negotiations of private activity financing, structuring Urban Enterprise Zone loans, economic structuring of landfill escrows, and other special services of this nature.

Cumberland Advisors provides asset management services through both wrap-fee programs and traditional management programs. Wrap fee programs, which are described in more detail in the applicable disclosure brochures published by their respective sponsors, bundle or “wrap” investment advisory, trade execution and custodial services into a package for which the client pays a single fee to the sponsor based on a percentage of the assets enrolled in the service. In addition, consulting services such as asset allocation and market advice may also be provided by Cumberland to the WRAP client. Program sponsors pay our investment advisory fee. Clients who participate in a wrap fee program should consider whether the program’s fees may exceed the aggregate cost of such services if they were to be provided separately. Clients should take into account the level of the fee charged by the sponsor, the amount of portfolio activity in the account, and the value of the custodial and other services, which are provided under the program.

This is different from traditional management programs whereby Cumberland’s services are provided for a fee, but transaction services are billed separately on a per-transaction basis and custodial services are billed by an unaffiliated custodian. From a management perspective, there is not a fundamental difference in the way Cumberland manages wrap-



fee accounts versus traditional management accounts. The only significant difference is the way in which transaction and custodial services are paid.

As of 12/31/14, the firm had \$2.32 billion in assets under management. This included fixed-income accounts (municipal bonds and taxable fixed income securities) as well as equity accounts (using exchange-traded funds only).

As of 12/31/14, Cumberland had (i) discretionary assets under management in the amount of \$2,319,413,358 and (ii) nondiscretionary assets under management of \$3,180,296.

## **ITEM 5 – FEES AND COMPENSATION**

### **A. Advisory Fees and Compensation**

#### **Investment Advisory Fees**

Cumberland Advisors charges an advisory fee (the “Advisory Fee”) to its direct investment advisory clients, in accordance with the fee schedules set forth below.

For Accounts custodied at US Bank or State Street Bank

<b>Exchange-Traded Fund (ETF) Portfolios</b>	
<b>Minimum Account Size in Each Investment Style: \$250,000</b>	
First \$250,000 - \$1,000,000	102.5 basis points (1.025%)
Next \$1,000,001 - \$2,000,000	87.5 basis points (.875 of 1%)
Next \$2,000,001 - \$3,000,000	77.5 basis points (.775 of 1%)
Next \$3,000,001 - \$5,000,000	67.5 basis points (.675 of 1%)
Negotiated fee rate on market value in excess of \$5,000,000	

**Minimum Household Investment Size: \$1,000,000**

Other Custodians

<b>Exchange-Traded Fund (ETF) Portfolios</b>	
<b>Minimum Account Size in Each Investment Style: \$250,000</b>	
First \$250,000 - \$1,000,000	100 basis points (1%)
Next \$1,000,001 - \$2,000,000	85 basis points (.85 of 1%)
Next \$2,000,001 - \$3,000,000	75 basis points (.75 of 1%)
Next \$3,000,001 - \$5,000,000	65 basis points (.65 of 1%)
Negotiated fee rate on market value in excess of \$5,000,000	

For accounts custodied at US Bank and State Street Bank

<b>Fixed Income Portfolios</b> <b>Master Limited Partnership (MLP) Portfolios</b> <b>Minimum Account Size in Each Investment Style: \$500,000</b>	
First \$500,000 - \$1,000,000	52.5 basis points (.525 of 1%)
Next \$1,000,001 - \$3,000,000	47.5 basis points (.475 of 1%)
Next \$3,000,001 - \$5,000,000	42.5 basis points (.425 of 1%)
Next \$5,000,001 - \$10,000,000	37.5 basis points (.375 of 1%)
Negotiated fee rate on market value in excess of \$10,000,000	

**Minimum Household Investment Size: \$1,000,000**

Other Custodians

<b>Fixed Income Portfolios</b> <b>Master Limited Partnership (MLP) Portfolios</b> <b>Minimum Account Size in Each Investment Style: \$500,000</b>	
First \$500,000 - \$1,000,000	50 basis points (.50 of 1%)
Next \$1,000,001 - \$3,000,000	45 basis points (.45 of 1%)
Next \$3,000,001 - \$5,000,000	40 basis points (.40 of 1%)
Next \$5,000,001 - \$10,000,000	35 basis points (.35 of 1%)
Negotiated fee rate on market value in excess of \$10,000,000	

**Minimum Household Investment Size: \$1,000,000**

For accounts custodied at US Bank and State Street Bank

<b>Balanced Portfolios</b> <b>Minimum Account Size in Each Investment Style: \$500,000</b>	
First \$500,000 - \$1,000,000	102.5 basis points (1.025%)
Next \$1,000,001 - \$3,000,000	87.5 basis points (.875 of 1%)
Next \$3,000,001 - \$5,000,000	77.5 basis points (.775 of 1%)
Next \$5,000,001 - \$10,000,000	67.5 basis points (.675 of 1%)
Negotiated fee rate on market value in excess of \$10,000,000	

**Minimum Household Investment Size: \$1,000,000**

Other Custodians

<b>Balanced Portfolios</b>		
<b>Minimum Account Size in Each Investment Style: \$500,000</b>		
First \$500,000 - \$1,000,000	100	basis points (1%)
Next \$1,000,001 - \$3,000,000	85	basis points (.85 of 1%)
Next \$3,000,001 - \$5,000,000	75	basis points (.75 of 1%)
Next \$5,000,001 - \$10,000,000	65	basis points (.65 of 1%)
Negotiated fee rate on market value in excess of \$10,000,000		

**Minimum Household Investment Size: \$1,000,000**

For accounts custodied at US Bank and State Street Bank

<b>Active Bond Passive Equity Portfolios</b>		
Institutional Account	Minimum Account Size \$5,000,000	32.5 basis points (.325 of 1%)
Individual Account	Minimum Account Size \$1,000,000	52.5 basis points (.525 of 1%)
Negotiated fee rate on market value in excess of minimum account sizes		

Other Custodians

<b>Active Bond Passive Equity Portfolios</b>		
Institutional Account	Minimum Account Size \$5,000,000	30 basis points (.30 of 1%)
Individual Account	Minimum Account Size \$1,000,000	50 basis points (.50 of 1%)
Negotiated fee rate on market value in excess of minimum account sizes		

**International Currency Hedged Exchange-Traded Fund (ETF Portfolios)**  
**Minimum Account Size \$5,000,000**

\$5,000,000 and over	Negotiable
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Cumberland reserves the right to waive the minimum account size and or impose a higher minimum account size for certain investment strategies. Cumberland also reserves the right to negotiate lower fees.. The management fee is not based on capital appreciation or performance of any type.

Investment advisory services to WRAP fee program clients can be provided under the same fee schedule (or in some cases a lower fee schedule) as the fee schedule for non-WRAP (Direct) accounts.

### **Consulting Services Fees**

Consulting Services fees are usually based on the following hourly rates (time is billed in quarter-hour increments). However, the Consulting Services fees may be based on a fixed negotiated fee. Certain consulting services are also available to qualified end users through soft dollar agreements between the end user and their brokerage firm.

Managing Director Consultation	\$1000/hour plus out of pocket expenses or per diem \$4000
Computer Programming, operation and running time	\$400/hour
Clerical and Administrative staff	\$200/hour

### **Miscellaneous Fees**

When acting as an Expert Witness or when requested to testify on request of the client, on behalf of the client, Cumberland will charge \$1000 per hour plus traveling expenses.

### **B. Payment of Fees:**

Investment advisory clients are typically billed in advance for advisory fees on a quarterly basis in the first month of each quarter. Accounts billed in arrears are an exception, and determined by custodian rules. Generally, new accounts that are opened during the quarter are billed when released for trading and additional deposits during the quarter generate interim invoices. Accounts that are closed during the quarter generate

interim credit invoices or refunds. [Set forth below is additional detail related to Cumberland's quarterly billing process]:

Quarterly bills for existing accounts

There are three types of accounts for billing purposes:

1. Direct-bill accounts – Our Accounting Department uses the fee calculated by the APX program, based on the market value on the last day of the prior quarter.
2. WRAP accounts – Custodian bills for Cumberland Advisors' services and generates a fee report for Cumberland's use.
3. WRAP accounts – Cumberland Advisors generates the custodian billing (e.g., Morgan Stanley Smith Barney, Wells Fargo Securities)\*

\* Accounts are invoiced by Cumberland Advisors, based on the market value on the last day of the prior quarter. The accounting department prepares a fee schedule that is uploaded via the internet to the custodian. Notifications are not mailed to the client by Cumberland Advisors.

Based on billing instructions for each, custodians will be notified of amounts owed by fax, email, or uploaded online. Fees will be posted to APX and/or Accpac (current accounting software), and copies of all invoices will be stored in Imaging.

Debit reports are generated in APX for WRAP accounts, by custodian. Fees are posted to Accpac when custodian reports/confirmations are received. In cases where the custodian reports are not received in a timely manner, Cumberland Advisors will estimate the amount to be received, based on prior-quarter ending market value, and will post the estimate to Accpac until the actual fee report is received, at which time the accounts will be adjusted in Accpac. A copy of all debit reports will be stored in Imaging.

#### New accounts opened during the billing period

When notice is received by email from the New Accounts Department that a new account has been released to trade, the accounting department will determine if it is a direct-bill account, a WRAP account for which Cumberland generates an invoice (e.g., Morgan Stanley Smith Barney, Wells Fargo Securities), or a WRAP account on which the custodian bills.

If it is a direct-bill account the accounting department will generate a prorated invoice in APX. The custodian will be notified of the fee amount to be paid.

If it is a WRAP account for which Cumberland generates an invoice, the accounting department will generate a prorated invoice in APX and a fee report will be sent to the custodian via internet.

New accounts will not be invoiced in the last month of the quarter for any amounts less than \$200.00, for direct-bill accounts or WRAP accounts for which Cumberland generates an invoice. Invoices or notifications generated will be posted in APX and Accpac and a copy will be stored in Imaging.

Accounts that are billed directly will receive an invoice. The invoice will be posted in APX and Accpac, and a copy of the invoice will be stored in Imaging. Invoices are due upon receipt.

WRAP accounts for which the custodian creates the charges will be posted when custodian fee reports are received. WRAP accounts that open in the current quarter may not be charged until the following quarter, depending on custodian rules. Any debit reports received or generated for WRAP accounts will be stored in Imaging.

#### Additional deposits to an account during the billing quarter

There will be no additional fees charged in the quarter in which a deposit is made to an existing account, unless the deposit is used to fund the initial account opening and unless

the fee amount for the remainder of the quarter is greater than \$200. If it is determined that an interim invoice is required, the invoice will be generated manually and will be posted in APX and Accpac and a copy of the invoice will be stored in Imaging.

WRAP accounts for which the custodian generates the charges will not be billed or posted unless a custodian fee report is received, as determined by custodian rules.

#### Withdrawals to an account during the billing quarter

There will be no credits issued in the quarter in which a withdrawal is made to an existing account, unless the fee amount for the withdrawal is greater than \$200. If it is determined that a credit is required, a credit invoice will be generated manually and will be applied against any outstanding balance in the client account and will be posted to APX and Accpac. If there is no outstanding balance remaining, the fee amount will be refunded to the client.

#### Accounts that close during the billing quarter

When notice is received by email from the Operations Department that an account is closing, the accounting department will manually calculate a prorated interim credit. Closed accounts will not be credited or refunded in the last month of any quarter, for any amounts less than \$200. Interim credits will be posted in APX and Accpac and a copy of the credit invoice will be stored in Imaging.

Accounts that are paid in full but have an outstanding credit balance will be refunded with a Cumberland Advisors check through accounts payable within approximately 45 days of closing.

### C. Additional Fees and Expenses

In addition to the Advisory Fees paid to Cumberland Advisors, investment advisory clients will sign separate agreements with a custodian and pay a fee for their custodial

services to that custodian. These fees may include an account set-up fee, an annual basic fee, and early closure fee, in addition to the basic quarterly fee charged by the custodian.

Additional fees and expenses that may be charged to investment advisory clients include the following:

- As part of our investment advisory services to you, we invest, or recommend that you invest, in exchange traded funds. The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by exchange traded funds (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses.
- Clients investing in Exchanged Traded Funds (ETFs) securities will pay a commission per share to the broker executing these trades. See Item 12, Brokerage Practices.
- Clients investing in bond accounts may be charged a “mark-up” or “mark-down” fee or if trade is done on an agency basis they may be charged a commission, which is paid to the broker executing the fixed-income securities trade.

#### D. Termination

Investment advisory clients are typically billed in advance for fees incurred on a quarterly basis in the first month of each quarter. The client may terminate the investment contract with Cumberland Advisors at any time, by a telephone call followed by a written notice. In the event of termination by the client, and upon written request from the client, prepaid fees for the current quarter will be refunded on a prorated basis.

### **ITEM 6 – PERFORMANCE BASED FEES AND SIDE BY SIDE MANAGEMENT**

Cumberland does not charge its client’s performance based fees. (i.e. fees based on a share of capital gains or capital appreciation of the assets of a client).



Side by Side Management – Not Applicable.

## **ITEM 7 – TYPES OF CLIENTS**

Our clients include high net worth individuals, institutions, public and corporate retirement plans, corporations, foundations and government entities (direct clients as well as managed money through financial advisors).

Generally, Cumberland requires a minimum “household” account size of \$1,000,000; however, Cumberland reserves the right to waive the minimum account or to impose a higher minimum.

## **ITEM 8 – METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

### **Firm Philosophy, Method of Analysis, and Investment Strategies**

Cumberland Advisors seeks capital preservation as its overriding investment priority. We manage risk as well as return. We strive to offset the erosion of financial assets by inflation, and to realize appreciation so that the real value of assets is maintained. We construct portfolios of bonds, stocks, or both. Investing in securities involves a risk of loss that clients should be prepared to bear.

Cumberland's portfolio managers work as a team to develop investment strategies. Each client works primarily with one investment adviser or portfolio manager.

Cumberland Advisors' portfolios reflect our clients' varying needs. Some clients are families with assets to be conserved and enhanced. Some are institutions seeking prudent supervision for retirement, endowment, or cash management. The objectives range from growth-oriented total return to current income.

We offer our investment management service to individuals and institutions either directly or through certain financial institutions and advisors (WRAP accounts). We focus on preservation and prudent growth of client money. We have multiple portfolio strategies to help do this.

All of our portfolio styles are in separately managed accounts only. This means that Cumberland Advisors does not manage a pooled investment vehicle where clients own “part” of the invested whole. Rather, our main strategies (known as portfolio styles) use individual bonds and investment funds to construct individual accounts based on specific objectives.

Our main portfolio styles are:

- Tax-Free Municipal Bonds
- Taxable Bonds
- Market-Based Exchange-Traded Funds (ETFs)  
(US, International, Global, Tactical Trend Allocation, Sector Rotation)
- Master Limited Partnership
- Commodity ETFs and ETNs
- International Currency Hedge

### **Core Concepts**

Since its founding in 1973, Cumberland Advisors' investment strategy has been based upon the following critical economic concepts:

- *The value of stocks and bonds is linked to interest rates.*
- *The nominal interest rate has three parts: a "real" interest rate, an expectation of inflation, and a risk premium.*
- *Opportunities in the markets are present at all times, especially in the midst of euphoria or hysteria.*

### **Fixed-Income Risks:**

Investing in any securities involves a risk of loss that the investor should be prepared to bear. Bonds have the following known risks:

- *Credit:* Creditworthiness of issuers impacts ability to pay.
- *Default:* Due to poor revenue, management failure, or fraud
- *Interest rate:* Rising inflation erodes real value of the bonds.

Notes:

1. *High Investment-Grade Bias:* We specialize in seeking highest-quality, investment-grade bonds for individual client accounts. The client owns specific bonds, chosen to satisfy the client account's specific requirements, usually with revenue-generating and general-obligation (GO) properties. We employ our own proprietary rating system and analysts to determine suitability of bonds for our conservative portfolios.
2. *Active Bond Management:* We actively manage the individual portfolios through the entire business cycle, lengthening or shortening durations, maturities, and features based on our market outlook. We do not construct laddered portfolios.

#### **General Exchange-Traded Fund (ETF) Risks:**

Investing in equity securities involves a risk of loss that the investor should be prepared to bear. Except for the Tactical Trend Allocation style, we use exchange-traded funds (ETFs) exclusively for our separately managed accounts equity practice. Relative to mutual funds, ETFs are more transparent, trade efficiently throughout the day on stock exchanges, have better tax scenarios, give pure market access to global markets and asset classes, and are significantly less expensive on the whole. ETFs have the following risks:

- *Transaction costs:* Can erase or erode gains. Need monitoring.
- *Lack of liquidity:* New or non-supported funds can raise bid/ask spread costs and impede quick exits.
- *Fund closure:* ETF sponsor can close fund (inconvenient).
- *Trading intricacy:* Due to market exchange mechanism, trading can be more complex.
- *Rebalancing:* Due to the rebalancing strategy used for ETF strategies, positions may be sold or closed in the very short-term (within 30 days). Also, the same security may be bought for some accounts, while being sold for others. This may result in increased commissions for some clients. This rebalancing strategy does not take into consideration any tax implications that may result from this type of trading

**General Exchange-Traded Notes (ETNs) Risks.** ETNs are different. Instead of being an independent pool of securities, an ETN is a bond issued by a financial institution. That company promises to pay ETN holders the return on some index over a certain period of time and return the principal of the investment at maturity. However, if something happens to that company (such as bankruptcy) and it's unable to make good on its promise to pay, ETN holders could be left with a worthless investment (just like anyone else who had lent the company money).

- **Credit Risk.** ETNs are unsecured debt obligations of the issuer.
- **Market Risk.** As an index's value changes with market forces, so will the value of the ETN in general, which can result in a loss of principal to investors.
- **Liquidity Risk.** Although ETNs are exchange-traded, a trading market may not develop.
- **Price-Tracking Risk.** Investors should be wary of buying at a price that varies significantly from closing and intraday indicative values.
- **Holding-Period Risk.** Some leveraged, inverse and inverse leveraged ETNs, are designed to be short-term trading tools, and the performance of these products over long periods can differ significantly from the stated multiple of the performance (or inverse of the performance) of the underlying index or benchmark during the same period.
- **Call, Early Redemption and Acceleration Risk.** Some ETNs are callable at the issuer's discretion.
- **Conflicts of Interest.** The issuer of the notes may engage in trading activities that are at odds with investors who hold the notes (shorting strategies, for instance).

### **Cash Management in Accounts**

We use cash as a strategic asset in tactically managing equity portfolios. As market uncertainty increases, we will raise cash levels by degrees in the accounts. A 30-50% cash level is an extreme position, signifying that we are significantly cautious about current market prospects. We are unlikely to raise cash levels beyond 50%, even in our

most cautious market view. Most cash positions range from fully invested (0% cash) to 25% cash.

### **TOTAL RETURN TAX-FREE MUNICIPAL BOND PORTFOLIO STYLE**

#### **Description**

We construct tax-free municipal bond portfolios for individual clients based on each investor's specific requirements. The service caters to clients who benefit from the tax-free nature of municipal bonds. We emphasize quality, investment-grade bonds coupled with active management through the full interest-rate cycle. Bonds that have revenue streams against them (such as water, utility, sewer, toll-road) are preferred. Due to the large size of our tax-free municipal bond practice, we can purchase large bond lot sizes at aggressive prices and pass the advantage through to the individual accounts.

#### **Method of Analysis and Investment Strategy**

The investment decisions for the Tax-Free Municipal Bond Portfolio Style bring together Cumberland Advisors' investment strategy for the global markets with actively managed municipal bonds.

- Individual client account objectives govern investment procedures.
- Portfolios are managed over the full interest-rate cycle, taking advantage of opportunities in market fluctuations.
- We take an active approach to maturities and duration while managing market changes as well as shifts in credit values.
- Trading frequency in each account varies widely based on market outlook. A properly constructed account may not need daily or monthly adjustments, but maturity and market changes may prompt trading.
- We seek to employ the account funds in suitable bonds at most times. Cash that is not employed does not generate value for the client.

## **Our Advantages**

*Large Dealer Network* – Cumberland is covered by almost 100 different municipal bond dealers. This allows us access to the best in new-issue and secondary bond activity.

*Market Inefficiencies* – Municipals are an over-the-counter market. There is not a central exchange, and there are over a million different municipal securities opportunities on both the buy and sell sides.

*“Under The Hood” Credit Monitoring* – Cumberland looks beyond the simple published rating and/or bond insurance. We look at underlying credits to minimize credit risk to investors, using our own proprietary ratings.

*Customized Investing* – When structuring for clients in “hard-to-find” bond states or providing a specified income stream, Cumberland can build portfolios to match individual needs.

## **Active Fixed-Income Investment Process:**

1. Forecast interest rates
  - a. Global context
2. Macroeconomic conditions
  - a. Consider inflation / real interest rates
  - b. Consider political and legislative environment
  - c. Gauge tax-free bond market supply
  - d. Gauge tax-free bond market demand
3. Analyze national and state-specific tax-exempt markets
4. Select bonds
5. Seek high-quality credit
6. Structure appropriate to rate forecast
  - a. Discount/premium
  - b. Current coupon
  - c. Call features
  - d. Put features

## **Risk of Loss**

Investing in any securities involves a risk of loss that the investor should be prepared to bear. Bonds have the following known risks:

- *Credit*: Creditworthiness of issuers impacts ability to pay.
- *Default*: Due to poor revenue, management failure, or fraud
- *Interest rate*: Rising inflation erodes real value of the bonds.

We seek to mitigate the risk of losses by:

- Specializing in high-quality, investment-grade bonds as the investable universe
- Emphasizing revenue-based bonds as well as general-obligation credits
- Monitoring the portfolio bond issues to detect potential risks that could indicate a potential for default
- Selling any bonds that we detect may have factors that could impact their value
- Studying closely monetary policy that impacts interest rates

## **TAX-FREE DURATION NEUTRAL (HEDGE) STYLE**

Traditionally, high-grade, tax-free municipal bonds have yielded less than U.S. Treasury bonds, due to the existence of the federal income tax. At times of high marginal tax rates, the ratio of tax-exempt yields to US Treasury yields tends to be low. At times of lower marginal tax rates, the ratio tends to be higher. Many factors can affect these ratios. When yields on tax-free bonds have risen above US Treasury yields, it has usually been for a short period of time and usually reflected either legislative efforts to change the tax structure or periods of unusually heavy supply of tax-free municipal bonds.

The goal is to provide a better-than-money-market return in a fully hedged (duration-offset position). Absolute returns can be higher when yield spreads narrow (when municipal yields fall faster than Treasury yields or go up less than Treasury yields).

Absolute returns can be lower when the opposite occurs (when Treasury yields are falling faster than municipal bond yields or are going up slower than municipal bond yields).

## **Method of Analysis and Investment Strategy**

The investment decisions for this Tax-Free Municipal Bond Portfolio Style bring together Cumberland Advisors' investment strategy for the global markets with actively managed municipal bonds.

We employ a strategy that uses municipal bonds combined with inverse Treasury ETFs such as PST and TBT (other similar ETFs may be used). These two inverse ETFs strive to give two times (2x) the inverse performance of the Barclays 7-10 year US Treasury index and the Barclay's 20+ year US Treasury index. By employing the inverse Treasury ETFs the overall duration risk of an account is reduced. The opportunities come when municipal bond yields narrow compared to US Treasury yields.

## **Risks of Loss**

Investing in any securities involves a risk of loss that the investor should be prepared to bear. Bonds have the following known risks:

- *Credit*: Creditworthiness of issuers impacts ability to pay.
- *Default*: Due to poor revenue, management failure, or fraud
- *Interest rate*: Rising inflation erodes real value of the bonds.

These ETFs, when purchased as LONG securities in the portfolio, are expected to give the INVERSE return times two of the respective US Treasury indices. These ETFS, such as PST and TBT entail certain risks, including inverse correlation, leverage, market price variance, and short-sale risks.

The risk is when municipal bond yields widen relative to US Treasury yields. In a portfolio where inverse treasuries are purchased to offset the overall duration on an account, in theory the account is protected from a parallel shift up in interest rates. However, when Treasury yields move lower than municipal bond yields, the strategy can perform poorly, as the inverse treasury ETFs will lose value more quickly than the municipal bonds gain value. These risks can increase volatility and decrease performance.

We look to mitigate the risk of losses by measuring the relative cheapness/richness of municipal bonds and finding periods when municipal securities are trading cheap on a



relative basis to US Treasuries. We use ongoing analyses of the US Treasury and municipal bond markets to ascertain points that will provide value and limit downside risk.

Additionally we aim to mitigate risk by:

- Specializing in high-quality, investment-grade bonds as the investable universe
- Emphasizing revenue-based bonds as well as general-obligation credits
- Monitoring the portfolio bond issues to detect potential risks that could indicate a potential for default
- Selling any bonds that we detect may have factors that could impact their value
- Studying closely monetary policy that impacts interest rates

Again, the goal is to provide a better-than-money-market return in a fully hedged (duration-offset) position. Absolute returns can be higher when yield spreads narrow (when municipal yields fall faster than Treasury yields or go up less than Treasury yields). Absolute returns can be lower when the opposite occurs, (when Treasury yields are falling faster than municipal bond yields or are going up slower than municipal bond yields).

### **TAX-FREE TACTICAL HEDGE STYLE**

A tactical hedge strategy is similar to the above except that the amount of inverse Treasuries bought to offset interest-rate risk may be less or more than 100%, depending on the strategy of the portfolio manager. For example, if the portfolio manager believes that a temporary underperformance or outperformance of one of the two markets is going to occur, the amount of inverse Treasuries to be bought or sold may be adjusted to less than fully hedged, fully hedged, or over hedged. Most of the time, the tactical hedge will have less than 100% hedge and more in municipal bonds.

## **PUERTO RICO INSURED BOND STYLE**

### **Description**

The underlying principles guiding portfolio decisions will be to capitalize on opportunities in the Commonwealth of Puerto Rico municipal bond market. These will include potential gains as well as income.

### **Method of Analysis and Investment Strategies**

The market for Puerto Rico municipal bonds has come under severe pressure in the past year due to a number of market and financial developments. These include ongoing deficits in the Commonwealth of Puerto Rico's general budget and also include underfunded pension obligations for the Commonwealth. It also includes some reductions in cash flows for the Commonwealth's agencies as well as its government development bank. Press coverage of Puerto Rico's financial difficulties has also heightened direct selling of Puerto Rico debt as well as some bond fund redemptions in those funds that own Puerto Rico debt. This has caused overall yields to rise significantly which we believe has created potential opportunity.

The portfolio will be comprised of insured Commonwealth of Puerto Rico bond issues including but not limited to General Obligation bonds, Public Building Authority, CoFina Sales & Uses Tax Bonds (Senior, First (second or third if issued) subordinated lien), Public Finance Corporation (Commonwealth Appropriation bonds), Government Development Bank, Pension Obligation bonds, Aqueduct and Sewerage bonds, Electric Power Authority bonds, Highway and Transportation bonds, Infrastructure Finance Authority bonds, Children's Trust bonds, Housing Finance Authority, Municipal Finance Agency, University of Puerto Rico, Convention Center District Authority bonds and Industrial Development bonds. Bonds will generally be rated "BBB" or lower. Most issues will be of longer maturity nature. The portfolio may include discount bonds, premium bonds and /or zero coupon bonds. It is expected that the majority of bonds will be in the discounted bond structure. Some bonds may include bond insurance on them as well.

This investment style may have a higher turnover rate than a total return municipal bond account as it will be a very actively managed portfolio. Bonds would be bought when

Cumberland feels the price justifies the risk and sold either to take a profit or cut losses where we deem necessary.

Leverage will not be used in this strategy.

### **Risk of Loss**

Investing in Puerto Rico securities involves a risk of loss that investors should be prepared to bear. This strategy will have the following risks:

*Credit:* Puerto Rico debt is widely considered to bear substantial credit risk. Poor financial performance will likely lead to downgrades by ratings agencies, which will reduce the market's perceived value of these securities. A downgrade to below-investment grade on any classes of debt will reduce the number eligible buyers for these securities, possibly resulting in illiquidity.

*Default:* Puerto Rico's high indebtedness and cash flow difficulties could result in nonpayment on its debt securities. Some market analysts have predicted that the Commonwealth will be insolvent within the next two years. A missed payment will reduce the market value and cash flows generated by the securities purchased in this strategy. A downgrade to below-investment grade on any classes of debt will trigger termination payments on the Commonwealth's outstanding derivative instruments, which could lead to nonpayment on its outstanding debt.

*Interest rate:* Rising inflation erodes the real value of all bonds. Puerto Rico bonds are no exception; however we expect the values of these securities to largely be based on the market's perception of the Commonwealth's creditworthiness.

There is also a significant risk due to liquidity, possible bankruptcy and risk of market access due to downgrades of Puerto Rico – the Commonwealth as well as its agencies. Because of the concentration of credit risk in a single area, overall risk is increased. There is also significant risk of what we call “headline risk”. That is, risk from

unfavorable press coverage of the Commonwealth and its finances. Headline risk has contributed to the volatility in Puerto Rico bond prices.

Cumberland will seek to mitigate these losses by:

- Performing continual surveillance on the finances of the Commonwealth and evaluate breaking developments as they occur.
- Selecting undervalued Puerto Rico securities to mitigate risk of loss
- Evaluate headline risk potential in the municipal bond market to determine attractive entry and exit points

### **TOTAL RETURN TAXABLE FIXED-INCOME PORTFOLIO STYLE**

We construct taxable bond portfolios for individual clients and institutions. We emphasize highest-quality bonds coupled with active management throughout the full interest-rate cycle. We actively manage bonds by constantly monitoring both bond and stock markets and rebalancing client portfolios as needed in times of fluctuation. We extend or reduce duration when we see compelling opportunities. We look to exit markets in periods of euphoria and to enter markets in periods of hysteria. We emphasize long-lasting relationships and continuous dialogue among clients, their consultants, tax advisors, accountants, and estate planners.

#### **Method of Analysis and Investment Strategy**

The investment decisions for the Taxable Bond Portfolio Style bring together Cumberland Advisors' investment strategy for the global markets with actively managed taxable bonds. We believe that value is realized by holding bonds for the proper duration in a given interest-rate environment. We think it is unwise to limit opportunities based on narrowly defined bond portfolio parameters. Consequently, Cumberland Advisors has developed expertise in identifying and managing bond portfolios throughout the complete interest-rate cycle while considering credits, relative yields, and durations.

## **Cumberland Advisors Taxable Fixed-Income Universe**

To accomplish duration exposure objectives in the portfolio, we assess the relative attractiveness of spreads between the following alternatives.

- U.S. Treasury bonds
- Federal agency debt
- Taxable municipal bonds
- Mortgage-backed securities
- Investment-grade corporate bonds
- Preferred Exchange Traded Funds

Niche bonds, such as taxable municipals, add value to portfolios by providing unique cash-flow characteristics, inefficient pricing opportunities, and high credit quality.

Preferred exchange traded funds may also be used.

### **Investment Strategies**

#### *Rising-Rate Environments*

- Bonds with substantial redemption or call features
- Bonds with higher coupons
- Bonds with shorter durations

#### *Falling-Rate Environments*

- Bonds with deeper discounts
- Bonds with lower premiums
- Bonds with longer maturities
- Non-callable bonds

### **Risk of Loss**

Investing in any securities involves a risk of loss that the investor should be prepared to bear. Bonds have the following known risks:

- *Credit:* Creditworthiness of issuers impacts ability to pay.
- *Default:* Due to poor revenue, management failure, or fraud
- *Interest rate:* Rising inflation erodes real value of the bonds.

- *Prepayment Risk (Mortgage-Backed Securities)*: The possibility that the mortgages underlying the security are repaid faster or more slowly than expected contracting or extending investment average life.

We seek to mitigate the risk of losses by:

- Specializing in high-quality, investment-grade bonds as the investable universe
- Selecting taxable bonds by relative attractiveness to other types of taxable fixed-income securities
- Monitoring the portfolio bond issues to detect potential risks that could indicate a potential for default
- Selling any bonds that we detect may have factors that could impact their value
- Closely monitoring monetary policy that impacts interest rates

### **TAXABLE TACTICAL HEDGE PORTFOLIO STYLE**

We construct taxable-bond portfolios for individual clients and institutions. We emphasize highest-quality bonds coupled with active management throughout the full interest-rate cycle. We actively manage bonds by constant monitoring both bond and stock markets, rebalancing client portfolios as needed in times of fluctuation. We extend or reduce duration when we see compelling opportunities. Cumberland Advisors employs the use of inverse fixed-income exchange-traded funds (ETFs) to reduce the duration or price sensitivity of a bond portfolio. We look to exit markets in periods of euphoria and to enter markets in periods of hysteria. We emphasize long-lasting relationships and continuous dialogue among clients, their consultants, tax advisors, accountants, and estate planners.

#### **Method of Analysis and Investment Strategy**

The investment decisions for the Taxable Bond Tactical Portfolio Style bring together Cumberland Advisors' investment strategy for the global markets with actively managed taxable bonds. We believe that value is realized by holding bonds for the proper duration in a given interest-rate environment. We think it is unwise to limit opportunities based on narrowly defined bond portfolio parameters. Consequently, Cumberland Advisors has

developed expertise in identifying and managing bond portfolios throughout the complete interest-rate cycle while considering credits, relative yields, and durations. Our use of leveraged inverse bond ETFs is strictly for the purpose of dampening the price volatility of the overall portfolio with a minimal amount of decrease in yield. We continually monitor the duration of the individual bonds in the portfolio and measure the portfolio duration versus the duration of the position held in inverse bond ETFs.

### **Cumberland Advisors Taxable Tactical Hedge Universe**

To accomplish duration exposure objectives in the portfolio, we assess the relative attractiveness of spreads between the following alternatives.

- US Treasury bonds
- Federal agency debt
- Taxable municipal bonds
- Mortgage-backed securities
- Investment-grade corporate bonds
- Inverse and leveraged inverse fixed-income ETFs
- Preferred Exchange Traded Funds

Niche bonds, such as taxable municipals, add value to portfolios by providing unique cash-flow characteristics, inefficient pricing opportunities, and high credit quality.

### **Investment Strategies**

#### *Rising-Rate Environments*

- Bonds with substantial redemption or call features
- Bonds with higher coupons
- Bonds with shorter durations
- Addition of inverse and leveraged inverse fixed-income ETFs

#### *Falling-Rate Environments*

- Bonds with deeper discounts
- Bonds with lower premiums
- Bonds with longer maturities
- Non-callable bonds

- Reduce or eliminate inverse or leveraged inverse bond ETFs

### **Risk of Loss**

Investing in any securities involves a risk of loss that the investor should be prepared to bear. Bonds have the following known risks:

- *Credit:* Creditworthiness of issuers impacts ability to pay.
- *Default:* Due to poor revenue, management failure, or fraud
- *Interest rate:* Rising inflation erodes real value of the bonds.

Inverse and leveraged inverse bond ETFs have the following known risks:

- *Tracking error:* Due to the structure of these securities, they may not closely track the index as designed.
- *Interest rate:* Rising bond prices may cause a decline in price or principal of the position.

We seek to mitigate the risk of losses by:

- Specializing in high-quality, investment-grade bonds as the investable universe
- Selecting taxable bonds by relative attractiveness to other types of taxable fixed-income securities
- Monitoring the portfolio bond issues to detect potential risks that could indicate a potential for default
- Selling any bonds that we detect may have factors that could impact their value
- Monitoring closely monetary policy that impacts interest rates
- Measuring and recalibrating the portfolio hedge position

### **MARKET-BASED EXCHANGE TRADED FUNDS**

#### **(U.S.; INTERNATIONAL (NON-US); GLOBAL (U.S. AND INTERNATIONAL))**

#### **Description**

Cumberland Advisors has a wealth-preservation orientation to balance risks as well as returns. The market-based equity portfolio styles offer clients and institutions one single investment account that holds multiple exchange-traded funds (ETFs) and provides highly diversified regional investment options. Broader market diversification provides



market exposure as well as risk reduction, decreasing risk that any individual stock may carry in a portfolio.

### **Method of Analysis and Investment Strategies**

The firm takes a top-down macroeconomic perspective to assess relative attractiveness among markets, sectors, regions, and asset classes. Exchange-traded funds (ETFs) allow for the implementation of Cumberland's macroeconomic and sector-specific judgments through a single investment vehicle. Multiple ETFs can then be tactically adjusted as Cumberland evaluates current market opportunities and risks.

### **Cumberland Advisors' Equities Management Philosophy:**

- *Risk management* is as important as return management.
- *Asset-allocation* techniques help stabilize returns and reduce risk.
- *Macroeconomic factors* and fundamentals drive asset-class returns.
- *Portfolio managers* add value by size, sector, subsector, style, region, and country choices, and NOT through individual stock picking.
- ETFs are the most flexible, efficient, and low-cost implementation method.

### **Crafting the Portfolios**

Managed ETF portfolios provide active management of investments in a core and satellite approach. Broad-based, diversified ETFs form the core, while country, region, sector, subsector, and style ETFs form the satellites. This strategy provides extensive diversification, low cost, and tax efficiency. It also controls strategic sector, style, industry, country, and region exposure, with no "style drift." ETFs are chosen based on liquidity, sponsor support, and cost. The core positions usually consist of 3-8 broad-based diversified ETFs, while the satellite positions usually consist of 15-20 country, region, sector, subsector and/or style ETFs.

<b>Examples of Exchange-Traded Funds by Category</b>	
<b>Size (Market Cap.)</b>	Large-cap, Mid-cap, Small-cap funds
<b>Sector (Industry)</b>	Finance, Technology, Health Care
<b>Sub-sector (Industry)</b>	Semiconductors, Drugs, Homebuilders
<b>Style</b>	Growth, Value
<b>Multi-Country</b>	Advanced Economies, Euro Zone, Emerging Markets
<b>Country</b>	U.S., Germany, U.K., Japan, China, Chile, etc.

### **Managing the Portfolio**

Cumberland's investment team continually monitors and analyzes economic and financial-market developments, together with the performance of assets in the portfolio. Model weights and ETF selections are made for core and satellite positions, and then tactically adjusted and rebalanced to each account based on strategy changes and market developments.

Non-US Exchange Traded Funds may be used in the US ETF style. These would technically be global ETFs but with a large part of the holdings held in the US and the ETF would be incorporated and trade in the US. This type of security provides exposure to U.S. sectors that are not necessarily available in US Exchange traded Funds.

### **Exchange-Traded Fund Portfolio Risks**

Investing in equity securities involves a risk of loss that the investor should be prepared to bear. We use exchange-traded funds (ETFs) exclusively for our separately managed accounts equity practice. Relative to mutual funds, ETFs are more transparent, trade efficiently throughout the day on stock exchanges, have better tax scenarios, give pure market access to global markets and asset classes, and are significantly less expensive on the whole. ETFs have the following risks:

- *Transaction costs:* Can erase or erode gains. Need monitoring.
- *Lack of liquidity:* New or non-supported funds can raise bid/ask spread costs and impede quick exits.
- *Fund closure:* ETF sponsor can close fund (inconvenient).

- *Trading intricacy:* Due to market exchange mechanism, trading can be more complex.
- *Rebalancing:* Due to the rebalancing strategy used for ETF strategies, positions may be sold or closed in the very short-term (within 30 days). Also, the same security may be bought for some accounts, while being sold for others. This may result in increased commissions for some clients. This rebalancing strategy does not take into consideration any tax implications that may result from this type of trading

### **Cash Management in Accounts**

We use cash as a strategic asset in tactically managing equity portfolios. As market uncertainty increases, we will raise cash levels by degrees in the accounts. A 30-50% cash level is an extreme position, signifying that we are significantly cautious about current market prospects. We are unlikely to raise cash levels beyond 25%, even in our most cautious market view. Most cash positions range from fully invested (0% cash) to 25% cash.

### **TACTICAL TREND ALLOCATION STYLE**

#### **Description**

The primary objective of this style is to generate investment appreciation through the tactical asset allocation of capital. The asset allocation will be at Cumberland Advisors' discretion.

#### **Method of Analysis and Investment Strategies**

The strategy utilizes trend following, relative strength, and price research to identify favorable investment opportunities across six general asset classes: domestic equities, international equities, fixed-income, commodities, currencies and cash. The strategy may include short or inverse positions when deemed appropriate for downside risk protection in the portfolio. The exposure levels to the six primary asset classes identified above can range from 0% - 100%. Short or inverse exposure will generally not exceed a 30% allocation.

## **Managing the Portfolio**

The strategy will mainly include exchange-traded funds (including commodity and currency ETFs). Exchange-traded notes (ETNs) can also be used if deemed appropriate. The portfolio may also include any individual equity, fixed-income security (including Treasury bills), or money market instruments when the individual security is advantageous versus the exchange-traded products that are available. Any one exchange-traded product security will not exceed 25% of the total portfolio at the time of initial purchase. Positions may subsequently exceed the 25% threshold due to market appreciation. When positions are held in individual stocks or bonds, no individual stock or bond instrument will exceed 10% of the portfolio at the time of initial purchase. Positions may subsequently exceed the 10% threshold due to market appreciation. Uninvested cash will be held in a money market instrument until required for the purchase of securities.

The methods of analysis fall within the general framework of technical analysis, specifically the use of trend analysis, relative strength and momentum tools. The investment goal is to achieve price appreciation by monitoring the supply and demand of specific ETFs over market periods. Turnover in the account could range from extremely low to excessively high depending on market movements. However, the fundamentals of trend analysis and momentum investing include finding entry points for emergent trends and then sticking with the successful trades. In such conditions turnover in the account would remain quite low. Both short-term and long-term capital gains will be generated in the portfolio style. The portfolio style follows a multi-asset framework which allows the manager to invest in multiple asset classes depending on risk/reward opportunities and potential returns.

## **US SECTOR ROTATION STYLE**

### **Description**

The primary objective is to significantly outperform the S&P 500 by buying and holding the cheapest 40% of sectors each quarter(i.e quarterly rebalancing). The asset allocation will be at Cumberland Advisors' discretion.

## **Method of Analysis and Investment Strategies**

Historical value factor analysis is the foundation for this style. Our hypothetical back tests indicate that favoring cheap over rich-sector ETFs on an earnings yield (E/P) basis has usually been a winning strategy over the past decade and may continue to outperform going forward. While recent returns have been encouraging they don't guarantee future returns

In weak markets, it appears that undervalued sectors have shaken out many buyers, so the downside may be relatively limited. That's an important characteristic for capital preservation and risk management. In strong markets, it seems that the oversold, out-of-favor, under-loved sectors may have the most relative upside. That's good for potentially enhancing returns above and beyond the benchmark.

## **Managing the Portfolio**

Our goal is to significantly outperform the S&P 500 by buying and holding the cheapest 40% of sectors each quarter (i.e quarterly rebalancing). At the end of each quarter, we rank the 10 S&P 500 sectors by earnings yield (from highest to lowest), buying and holding the corresponding sector ETFs with the 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> highest earnings yields. If a low-ranked sector from the prior quarter ranks in the top 4 in the current quarter, it's a "buy". If a high-ranked sector from the prior quarter falls out of the top 4 in the current quarter, it's a "sell".

## **Exchange-Traded Fund Portfolio Risks**

Investing in equity securities involves a risk of loss that the investor should be prepared to bear. Relative to mutual funds, ETFs are more transparent, trade efficiently throughout the day on stock exchanges, have better tax scenarios, give pure market access to global markets and asset classes, and are significantly less expensive on the whole. ETFs have the following risks:

- *Transaction costs*: Can erase or erode gains. Need monitoring.
- *Lack of liquidity*: New or non-supported funds can raise bid/ask spread costs and impede quick exits.
- *Fund closure*: ETF sponsor can close fund (inconvenient).

- *Trading intricacy:* Due to market exchange mechanism, trading can be more complex.
- *Rebalancing:* Due to the tactical rebalancing discipline inherent in the strategy, turnover in the account could range from exceptionally low to extremely high and will vary based on the market environment and the need to reposition capital. Security positions may be sold or closed in the very short term (within 30 days). Rebalancing in the strategy does not take into consideration any tax implications that may result. Both short-term and long-term capital gains could be generated through this strategy
- *ETN Risks:*
  - Credit Risk: ETNs are unsecured debt obligations of the issuer.
  - Market Risk: As the value of an index changes with market forces, so will the value of the ETN in general, which can result in a loss of principal for investors.
  - Liquidity Risk: Although ETNs are exchange-traded, a trading market may not develop.
  - Price-Tracking Risk: Investors should be wary of buying at a price that varies significantly from closing and intraday indicative values.
  - Holding-Period Risk: Some leveraged, inverse and inverse-leveraged ETNs, are designed to be short-term trading tools, and the performance of these products over long periods can differ significantly from the stated multiple of the performance (or inverse of the performance) of the underlying index or benchmark during the same period.
  - Call, Early Redemption and Acceleration Risk: Some ETNs are callable at the issuer's discretion.
- *Fixed Income Risk:*
  - Credit: Creditworthiness of issuers impacts ability to pay.
  - Default: Due to poor revenue, management failure, or fraud
  - Interest rate: Rising inflation erodes real value of the bonds.

The goal of the strategy is to manage risk by tactical allocation of capital across the main asset classes available to market participants.

### **Cash Management in Accounts**

We use cash as a strategic asset in tactically managing equity portfolios. As market uncertainty increases, we will raise cash levels by degrees in the accounts. A 30-50% cash level is an extreme position, signifying that we are significantly cautious about current market prospects. We are unlikely to raise cash levels beyond 25%, even in our most cautious market view. Most cash positions range from fully invested (0% cash) to 25% cash.

### **ACTIVE/PASSIVE US BALANCED PORTFOLIO STYLE**

#### **Description**

The diversified portfolio objective is to have long-term capital gains, low turnover, higher risk-adjusted returns, and low fees.

Suits investors or institutions who understand the value of active bond management and want to avoid exposure to bond mutual funds or other pooled fixed-income investments

Suits investors who for tax or philosophical reasons want to pursue almost exclusively long-term capital gains for the equity portion of the investments

#### **Method of Analysis and Investment Strategies**

Follows Modern Portfolio Theory assumptions (60% Equity/40% Fixed Income) in Buy/Hold/Rebalance management style.

Offers active bond management and passive equity exposure. Passive exchange-traded funds (ETFs) are used for equity exposure. Individually selected and actively managed, high credit-quality bonds are employed for fixed income exposure.

#### **Managing the Portfolio**

The bond portion of the account is actively managed although the actual turnover in the bonds will be low.

Individual bonds are purchased to be held in the account according to the overall investment strategy of the portfolio management team's judgment. The bonds are

investment grade securities managed in a total return manner to maximize value over the full interest rate cycle.

The equity portion of the account contains two broad-based exchange-traded funds that efficiently give the investor passive access to a majority of the US equity market. Forty-two (42%) percent of the portfolio contains the exchange-traded fund SPY, the S&P 500 ETF. The remaining eighteen percent (18%) of the portfolio contains the exchange-traded fund MDY, the mid-cap ETF containing the next 400 stocks beyond the S&P 500 companies.

The accounts are reviewed quarterly and are rebalanced back to the original percentage when the mix between equities and bonds vary significantly from the 60/40 mandate

### **MASTER LIMITED PARTNERSHIP (MLP) STRATEGY (INCLUDES K-1 PARTNERSHIPS)**

#### **Description**

The strategy seeks to enable investors to invest in Master Limited Partnerships (MLPs) to obtain attractive returns offered by many of these instruments. With the assistance of a sub-advisor, Cumberland Advisors will provide investment advice to invest in MLPs.

The advisor will attempt to invest in partnerships which have stable or increasing distributions to provide investors attractive cash returns; research will focus on providing investors with an attractive risk adjusted return on their investments. Many of the partnerships invest in energy related assets that require large amounts of capital. As a result these partnerships may offer the investor tax advantaged returns. This strategy will generally require investors to file tax forms related to k-1 partnership distributions. The sub-advisor for MLPs is RSD Advisors (see section 2B for more information on RSD Advisors). Cumberland Advisors has an agreement with Plush Smith PA in Sarasota, FL. to provide advice on the tax considerations on MLPs.

#### **Method of Analysis and Investment Strategy**

The manager will use fundamental research methods utilizing publications from various resources, including reports by securities firms and other research providers. Cumberland also has a sub-advisor agreement with RSD Advisors, LLC to provide research and trading assistance on this strategy. The manager will assess the various sub industries in



the Master Limited Partnership universe including but not limited to upstream, downstream and midstream energy partnerships. Due to the costs incurred from frequent trading in these instruments, including bid/ask spreads, direct transaction costs, and tax consequences of frequent trading; the manager does not anticipate the strategy will have a high turnover rate.

### **Risk of Loss**

Master Limited Partnerships have business risk. The risks to investing in these securities include but are not limited to corporate governance, tax changes by government entities, financial leverage, continued access to markets for funding the partnerships, liquidity risks, geographic risks, commodity price risks, and market risk.

We seek to mitigate the risk of losses by:

Cumberland will analyze financial metrics and risks of the partnerships including corporate structure and governance. The analysis will focus on business prospects and sustainability of the partnerships and take into account fundamental financial metrics of the partnerships.

## **STRATEGIC COMMODITY PORTFOLIO STYLE**

### **Description**

The strategy seeks to enable investors to generate investment appreciation through dynamic capital allocation of commodity Exchanged-Traded Funds (ETFs) and Exchanged-Traded Notes (ETNs). At times the portfolio will utilize inverse ETFs/ETNs that are designed to benefit from a decline in value of the underlying asset. With global concerns rising regarding environment hazards, the scarcity of water, climate change, geopolitical unrest and over population, commodity ETFs/ETNs have developed into a separate asset class, therefore providing an alternative to investors looking to diversify their traditional asset classes, such as equities and bonds. With the assistance of the sub-advisor, Cumberland Advisors will provide asset allocation at their discretion.

### **Method of Analysis and Investment Strategies**

The strategy primarily utilizes fundamentals and technical analysis related to world crop production and climatic influences to identify favorable investment opportunities within

the energy and agricultural commodity markets. The strategy may occasionally invest precious metals and non-agricultural based commodities such as water and renewable energies.

**The following provide Sub-Advisory Research Services on the Strategic Commodity Style**

**Robert J. Ogilvie.** Mr. Ogilvie is a principal and the chief strategist for Robot Futures. Mr. Ogilvie has over 16 years of trading experience stemming from his belief of non-conventional methods of trading characterized by his effective use of market volatility, unique non-correlated strategies, and systematic trade selection and exit techniques. His ability to blend systems, techniques, and strategies to create a proprietary methodology allows for the best risk to reward potential. Prior to founding ROBOT in January 2007, Mr. Ogilvie founded Coastal Capital Management, a Florida RIA and the General Partner to three Investment Funds including a multi-strategy and an income fund. He gained much of his institutional trading and capital management experience as the head trader of the funds under management. In addition to serving as the Chief Investment Officer, Mr. Ogilvie created multiple investment strategies utilizing equities, debt instruments, commodities, and foreign currency.

**James P. Roemer.** Mr. Roemer has over 30 years of experience as a research analyst, commodity trading advisor, and weather forecaster for major grain companies, energy companies, and hedge funds. Mr. Roemer is registered with the Commodity Futures Trading Commission and National Futures Association as a Commodity Trading Advisor. He has consulted with thousands of farmers and futures traders since the 1980's and currently advises a multi-billion dollar commodity fund based in the New York City area with one of the most successful longer-term track records. Mr. Roemer applies his strong understanding of technical analysis, cycles, and psychology of commodity markets to his consulting clients and Climatic Prophets program.

**Martina K. Schmidt, Ph.D** Ms. Schmidt holds a Ph.D. in Finance with a focus on International Finance and an MBA with a focus on International Marketing, both from Florida Atlantic University. She provides investment research, strategic consulting, and marketing support services to Cumberland's commodity sub-advisory team. Martina has over 20 years of experience in the field of financial analysis and research, real estate

investment and sales, as well as financial education. Besides having been involved in the marketing and financial analysis of multi-million dollar commercial and residential real estate projects, she has worked in financial management and sales for an aviation company and given multiple corporate training seminars in finance. In 2002, Martina joined the College of Business faculty at the University of South Florida St. Petersburg, where she teaches undergraduate and graduate level courses in the topics of corporate finance, international finance, and real estate. In addition to publishing numerous articles in refereed journals in the fields of education, investments, international finance, and real estate, she has earned multiple distance learning, face to face teaching, and research awards.

### **Managing the Portfolio**

The dynamic approach of the strategy results in actively managing positions from long to short or inverse positions. The exposure levels to the commodity markets identified above can range from 0% - 100%. Exposure to cash and cash equivalents can be significant and range from 0 to 100%. The portfolio will consist of between zero and fifteen positions and may also include money market instruments when the individual security is advantageous versus the exchange-traded products available. Any one exchange-traded product security will not exceed 30% of the total portfolio at the time of initial purchase. Positions may exceed the 30% threshold due to market appreciation. Due to the rebalancing discipline inherent in the strategy, turnover in the account could range from exceptionally low to extremely high and will vary based on the market environment and the need to reposition capital. Security positions may be sold or closed in the very short term (within same day) resulting in Wash sales. Rebalancing in the strategy does not take into consideration any tax implications that may result. Both short-term and long-term capital gains could be generated through this strategy. Due to tax considerations, this strategy is best suited to non-taxable accounts such as Charitable or Retirement accounts.

**Risk of Loss**

Investing in equity securities involves a risk of loss that the investor should be prepared to bear. The risks to investing in ETF/ETN commodity-based securities include but are not limited to commodity price risk, lack of liquidity, fund closure, trading intricacy, rebalancing, credit risk, market risk and holding-period risk.

We seek to mitigate the risk of losses by: Cumberland Advisors will analyze financial metrics and risks of the ETFs/ETNs utilized in the Strategic Commodity portfolio style as well as provide asset allocation.

**INTERNATIONAL CURRENCY HEDGED ETF PORTFOLIO****Description**

The portfolio style is ideal for US investors who are looking to minimize the erosion of international (non-US) investment gains due to currency conversions in a strengthening US dollar scenario. Any currency-hedged ETF can be included in the investment selection for the portfolio. This includes any start-up ETFs or any country, region, or sector-hedged ETFs that focus on investments outside the US.

**Method of Analysis and Investment Strategies**

The firm takes a top-down macroeconomic perspective to assess relative attractiveness among markets,

Currency-hedged ETFs are a small but growing investment option for international investing. Companies such as WisdomTree, Deutsche Bank, First Trust, Direxion, and ProShares are currently sponsoring a variety of currency-hedged ETFs. The offerings span the sectors of international fixed-income, Japan large- and small-cap, developed non-US markets (Europe, Australasia, Far East), emerging markets, Germany, Brazil, United Kingdom, Eurozone, South Korea, and developed-market mergers. Future currency-hedged sponsors and currency-hedged ETFs will provide greater choices for selection in the portfolio.

### **Managing the Portfolio**

Multiple ETFs may be tactically adjusted as Cumberland evaluates current market opportunities and risks. The portfolio may contain currency hedged ETFs that focus on specific international country exposure, a broad international exposure or specific or broad international geographic region.

Due to the rebalancing strategy used for ETF accounts, positions may be sold or closed in the very short term (within 30 days). In addition, the same security may be bought for some accounts while being sold for others. This may result in increased commissions for some clients. This rebalancing strategy does not take into consideration any tax implications that may result from this type of trading.

Social investing restrictions cannot be adhered to when investing in ETF securities. Uninvested cash will be held in a money market until required for the purchase of securities.

### **Risks of Loss**

International market risks include (but are not limited to) currency risks (via a weakening US dollar) and political, trading, liquidity, and settlement risks, particularly for those ETFs that are newly created with smaller overall assets under management (AUM).

Investments in currency involve additional special risks, such as credit risk, interest rate fluctuations, and derivative investments that can be volatile and may be less liquid than other securities as well as more sensitive to the effects of varying economic conditions. A weakening US dollar would reduce the performance of the portfolio. Changes in currency exchange rates and the relative value of non-US currencies may affect the value of a fund's investments and the value of your fund shares and expose your portfolio to risk of losses due to foreign currency fluctuations or to political or economic instability.

### **ITEM 9 – DISCIPLINARY INFORMATION**

There is no disciplinary information to report.

## **ITEM 10 – OTHER FINANCIAL ACTIVITIES AND AFFILIATIONS**

### **A. Broker-Dealer Registration Status**

Neither Cumberland nor any of its management persons is registered, or have an application to register, as a broker-dealer or a registered representative of a broker-dealer.

### **B. Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Adviser Registration Status**

Neither Cumberland nor any of its management persons is registered, or has an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading adviser, or an associated person of the foregoing entities.

### **C. Material Relationships or Arrangements with Related Parties which are Industry Participants**

Neither Cumberland nor any of its management persons has any relationship or arrangement that is material to its advisory business or to its clients with any related person who is a broker-dealer, municipal securities dealer, or government securities dealer or broker; investment company or other pooled investment vehicle (including a mutual fund, close-end investment company, unit investment trust, private investment company or “hedge fund” and offshore fund; other investment adviser or financial planner; futures commission merchant, commodity pool operator, or commodity trading adviser; 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 limited partnerships.

### **D. Material Conflicts of Interest Relating to Other Investment Advisers**

Cumberland does not recommend or select other investment advisers for its clients.

### **E. Miscellaneous**

Cumberland provides Sub-Advisory services to Marlin Financial, Delray Beach Fl.

## **ITEM 11 – CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **Code of Ethics**

Cumberland Advisors has adopted a Code of Ethics that covers personal securities transactions by its employees and associated persons. The Code of Ethics also describes Cumberland's standards of business conduct, compliance with federal securities laws, and Cumberland's fiduciary duty to its clients.

A copy of our Code of Ethics is available, free of charge, to any client or prospective client upon request by calling 800-257-7013, extension 315.

While Cumberland believes that the individual investment activities of its employees and associated persons should be encouraged, it seeks to avoid conflicts of interest (or even the appearance of conflicts) surrounding the advisory services it provides to its clients and the personal investments of its employees and associated persons. Pursuant to the Code of Ethics, certain restrictions apply to the investment activities of persons associated with Cumberland. In general, in any situation where the potential for a conflict exists, transactions for clients must take precedence over personal transactions of such employees or associated persons. Should any situation arise which is not specifically governed by this Code of Ethics, this general intent shall govern the resolution of the matter.

Both employees of Cumberland and the firm's proprietary account may invest in the same securities as those in clients' managed accounts. This may present a conflict of interest, in that Cumberland or its employees may obtain a better execution on a trade than a managed client. In order to address this potential conflict, Cumberland has the following rules in effect.

1. All employees must request and receive approval prior to any trading being done in their non-managed personal securities accounts.

## 2. Employee Equity Trades

Trading is decided upon by the Portfolio Manager of each particular style.

Some securities may be traded by different portfolio managers in a number of different styles. Employee trades may be completed the same day as Managed Account trading as long as all Managed account trading in the particular style has been completed.

While, Portfolio Manager discussions will try to avoid it, this may result in employee trades completed in “XYZ” security in Global (or other style) accounts being executed the day before trades for “XYZ” are completed in Managed account in the Commodity, Tactical Trend or other styles.

3. Employee and Cumberland proprietary account fixed-income trades may be included with or traded on the same day as fixed-income trades in the same securities that are traded for managed accounts. If a fixed-income trade order is not completely filled, the employee and/or Cumberland proprietary account will be the first order dropped out of the allocation procedure.
4. There is no blackout period or prior approval needed when employee or Cumberland proprietary accounts trade mutual funds.

## **ITEM 12 – BROKERAGE PRACTICES**

### **A. Factors Considered in Selecting or Recommending Broker-Dealers for Client Transactions**

When choosing a broker to execute a trade for a client’s account, Cumberland seeks to obtain the best execution for the client while taking the following into consideration: the price at which the trade will be executed, cost of effecting the transaction, the ease and speed of execution, the reliability of the broker through past experience, and the ability to work a large order without negatively affecting the market. In the case of fixed-



income securities, we may also consider whether the broker provides Cumberland with liquidity and competitive pricing on smaller lots of bonds, as well as who is the lead manager on a new issue.

1. Research and other Soft Dollar Benefits. Subject to its general policy of seeking quality execution at reasonably competitive rates, and unless instructed by a client to use a particular broker dealer(s), Cumberland may execute transactions for any account through broker-dealers including trades that include commissions received from riskless principal transactions eligible for soft dollar credits under Section 28(e) of the Securities Exchange Act of 1934, as amended (“the 1934 Act”) and the allocation of principal business and portfolio brokerage and the acquisition of securities in underwritings. A portion of the commission paid by the client will be used to provide Cumberland Advisors with research and other services designed to assist in the furnishing of investment advice to its clients’ accounts. .
  - a. When client brokerage commissions are used to obtain research or other products or services, Cumberland receives a benefit, because we do not have to pay for these services directly.
  - b. This could provide an incentive for Cumberland to select a broker-dealer based on our interest in receiving the research or other products or services, rather than on the best interest of our client in receiving the most favorable execution.
  - c. Commissions (or markups or markdowns) charged by brokers providing soft-dollar services may be higher than those charged by brokers not providing these services.
  - d. Soft dollar services are used to benefit all of our client accounts. Services are not allocated proportionately to the soft dollar credits each account generates. Receipt of these services, in exchange for soft dollars, benefits Cumberland Advisors by, among other things, allowing Cumberland to (i) supplement its own research and analysis activities and (ii) receive the

views and information of individuals and research staff of other securities firms having special expertise on certain companies, industries and areas of the economy and market factors without having to produce or pay directly for such research, products or services.

- e. Generally research services provided by brokers may include information on the economy, industries, groups of securities, individual companies, statistical information, accounting and tax law interpretations, political developments, legal developments affecting portfolio holdings, technical market action, pricing and appraisal services, credit analysis, measurements analysis, performance analysis and analysis of corporate responsibility issues. Such research services are received primarily in the form of written reports, access to various computer generated data and research software.
- f. Cumberland currently has soft-dollar arrangements with LEK Securities, Wallach Beth Capital LLC, Cantor Fitzgerald, Convergenx and Academy Securities. Trades are done through LEK Securities, Wallach Beth, Cantor Fitzgerald and Convergenx at 4 cents per share and 3.992 cents of that is accrued for research services. Cumberland has an agreement with Academy Securities where Cumberland decides the commission on Agency fixed-income trades and 50% of the commission is credited to soft dollars.

During fiscal year 2014, the following services were provided by LEK Securities through soft dollars: Bloomberg research and pricing data; Action Economics, economic and market research reports and updates; The Bond Buyer, fixed-income market and interest-rate forecasts research; Moody's, fixed-income and interest rate research; The Gartman Letter, daily commentary on global capital markets; IHS Global Inc. international economic data, research and forecasts; Strategas Economic Research.

During the fiscal year 2014, Convergenx provided the following services: Bloomberg research and pricing data; Haver Analytics, macro strategy and economic research and statistics; Robert Brusca-FAO Opinions, research on the economy, global trends, and political changes; Standard and Poors Capital IQ, desktop research, screening, real-time market data, back-testing, portfolio management, valuations; Ned Davis economic research reports; Applied Global Macro Research, statistical analysis of the economy and financial markets; Glusken Sheff-Breakfast with Dave, daily economic reports; Macro Vision Research, Forward looking, actionable investment ideas on the financial markets, with a focus on US equities; Talley Ledger, research services; BCA research services, research reports on equity markets, global and European investment strategies and US bond strategies; Capital Economics, Macroeconomic research; Dorsey Wright Associates, global technical research; Energy and Income Advisor, economic and commodity forecasts.

During the fiscal year 2014, Cantor Fitzgerald provided the following service. Oxford Economics, economic data and forecasts.

During the fiscal year 2014, Wallach Beth provided the following service. Glusken Sheff, Breakfast with Dave, daily economic reports.

During the fiscal year 2014, the following services were provided through credits remaining from prior soft dollar agreements.

KCG (Knight) – Macro Vision Research

While there are no soft-dollar agreements in place with the following brokers, we have executed trades through these brokers and received proprietary economic and fixed-income market research material from them during fiscal year 2014: Morgan Stanley, Goldman Sachs, Citibank,

Barclays, Morgan Keegan, BMO, Merrill Lynch, JP Morgan, Piper Jaffrey, Wells Fargo, Citigroup, Stifel and Loop.

The majority of our equity trades in fiscal 2014 were done through LEK securities and Convergex. Since LEK and Convergex have provided electronic connectivity with our order management system, we are able to enter orders with direct access to the market. Orders are executed quickly and efficiently. In some cases, where entering a large order all at once would negatively affect the market, we have the ability to work larger orders in pieces in an efficient manner. Convergex also has the ability to create baskets for illiquid ETFs. When necessary, in trading an illiquid security, Convergex can combine our Direct and Wrap accounts and execute at the same price. In this case, WRAP accounts would be done as step-outs and are not charged commission fees.

2. Brokerage for client referrals – not applicable
3. Directed brokerage – In some cases, a client may be allowed to direct trades to a particular broker. This is determined on a case by case basis. When a client directs Cumberland to use a specific broker for executing a securities transaction, Cumberland may be unable to achieve the most favorable execution of the client's transaction. For example, we may not be able to aggregate trades with other accounts, which could result in higher transaction costs to the client.

Cumberland serves as a portfolio manager in several wrap-fee programs. These wrap fee programs are arrangements in which investment advisory services, brokerage execution services and custody are provided by a sponsor for a single predetermined "wrap" fee (regardless of the number of trades completed by a client) Generally, clients participating in a wrap-fee program ("Wrap Program Clients") pay this single, all-inclusive fee quarterly to the program sponsor, based on the net assets under management. Cumberland receives from the program sponsor a portion of the wrap fee for the portfolio management services it provides. Each program sponsor has prepared a brochure which contains detailed information about its wrap-fee program,

including the wrap fee charged. Copies of each brochure are available from the program sponsor upon request. Wrap Program Clients should note that we may execute transactions for their accounts through the wrap sponsor if directed by the client or wrap sponsor. Transactions executed through a wrap sponsor may be less favorable in some respects than Cumberland's clients whose trades are not executed through the wrap sponsor. This is because we may not have the ability to negotiate price or take advantage of combined orders or volume discounts. Cumberland may be constrained in obtaining best execution for Wrap Program Clients by sending trades to the Wrap Sponsor.

#### B. Order Aggregation

When executing client transactions, where the accounts involved are held at the same custodian, trades may be bunched (or aggregated) with other clients' trades. This increases the average size of orders to brokers and can result in a better execution. Small odd-lot-sized trades can result in a negative price difference to the client. Accounts held at different custodians cannot be bunched together.

### **ITEM 13 – REVIEW OF ACCOUNTS**

#### A. Frequency and Nature of Review of Client Accounts or Financial Plans

All accounts are reviewed quarterly by the investment adviser representative with staff assistance or client service representative assigned to such accounts. Such representative may also be the portfolio manager assigned to such account. Such representatives typically review the account to confirm that the account is invested according to its investment policy. Accounts are also reviewed on a random basis by the Compliance Department to confirm that the account is invested properly.

#### B. Factors Prompting Review of Client Accounts Other than a Periodic Review

Client accounts are also reviewed on a non-periodic basis, specifically when investments with respect to such accounts are being bought or sold. In addition, clients may request a review of their accounts by the portfolio manager assigned to their account at any time. Accounts are also reviewed on a random basis by Cumberland's Compliance Department to determine/confirm whether accounts are invested properly.

#### C. Content and Frequency of Account Reports to Clients

Clients receive from Cumberland written quarterly and annual reports regarding their accounts. These reports include the previous and current market value of the account and the performance of such accounts for the period in question. In addition, the reports list the assets that comprise the account and their respective market values. Clients may also request additional reports from Cumberland including confirms, gain and loss reports, and customized reports.

### **ITEM 14 – CLIENT REFERRALS AND OTHER COMPENSATION**

#### A. Economic Benefit for Providing Services to Clients

Cumberland has a client who has their broker pay Cumberland for Cumberland's services provided to the client. Cumberland has no affiliation with and does not trade through said broker.

#### B. Compensation to Non-Supervised Persons for Client Referrals

Cumberland has agreements in place with various solicitors who receive a percentage of the annual investment Advisory Fee charged to clients on accounts that were introduced to Cumberland by such solicitor. The fee paid to these solicitors is

deducted from the Advisory Fee received by Cumberland from its clients, and therefore, is part of and not additional to the Advisory Fee charged to Cumberland's clients. This arrangement remains in place for the life of the account as long as the solicitor agreement remains in effect.

### **ITEM 15 – CUSTODY**

Cumberland will send a report to State Street Bank, U.S. Bank and Mellon Bank for investment advisory fees. The banks will then debit the accounts and forward the funds to Cumberland. If a client has designated one of these banks as the custodian for their account, the client will receive monthly statements from the bank. Clients should carefully review these statements. They should also compare these statements with the quarterly reports received from Cumberland Advisors.

Clients sign a separate custodial services agreement with a qualified custodian of their choice.

### **ITEM 16 – DISCRETION**

When opening an account, Cumberland requires that each client sign a limited power of attorney that gives Cumberland discretion over the management of the account, subject to the investment parameters designated by the client and Cumberland to meet the client's investment objectives. In addition, clients may impose certain restrictions on their accounts such as cash restrictions, maturity restrictions, and in some cases, asset-allocation restrictions.

### **ITEM 17 – VOTING CLIENT SECURITIES**

Cumberland Advisors shall vote proxies related to all managed and non-managed securities. The authority to vote proxies is established in the client's Client Services Agreement or comparable documents. In accordance with our fiduciary duties and SEC Rule 206(4)-6, we have adopted policies and procedures that we believe are reasonably designed to ensure that proxies are voted in the best interests of our clients.

We use Glass Lewis research to assist in voting decisions and vote through a third party vendor. Should a conflict of interest arise between Cumberland Advisors and the client's best interest, the proxy will be voted in accordance with the recommendation of Glass Lewis. Clients may obtain information on how a proxy on a security held in their account was voted and/or a copy of our proxy voting policy and procedures by calling 800-257-7013, extension 315.

## **ITEM 18 – FINANCIAL INFORMATION**

- A. Cumberland does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance.
- B. There are no financial conditions that are reasonably likely to impair Cumberland's contractual commitments to clients.
- C. Cumberland has never been the subject of a bankruptcy petition.



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## CUMBERLAND ADVISORS®

ADV PART 2 B

Revised 09/15/2015

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**ITEM 1 – COVER PAGE – Chairman, CEO, CIO and US Exchange Traded Funds Styles, Master Limited Partnership and Strategic Commodity style, Portfolio Mgr. As CIO, Mr. Kotok is co-manager on all styles.**

- A.
1. **DAVID R. KOTOK**, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, extension 320.
  2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 09/15/2015
- B. This brochure supplement provides information about David R. Kotok that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

David R. Kotok co-founded Cumberland Advisors in 1973 and has been its Chief Investment Officer since inception. He holds a B.S. in Economics from The Wharton School of the University of Pennsylvania, an M.S. in Organizational Dynamics from The School of Arts and Sciences at the University of Pennsylvania, and a Masters in Philosophy from the University of Pennsylvania. Date of Birth 3/3/1943.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

## **ITEM 4 – Other Business Activities**

Mr. Kotok's articles and financial market commentary have appeared in The New York Times, The Wall Street Journal, Barron's, and other publications. He is a frequent contributor to Bloomberg TV and radio, Fox Business, and other media.

Mr. Kotok has served as Program Chairman of the Global Interdependence Center (GIC) ([www.interdependence.org](http://www.interdependence.org)), whose mission is to encourage the expansion of global dialogue and free trade in order to improve cooperation and understanding among nation states, with the goal of reducing international conflicts and improving worldwide living standards. Mr. Kotok chaired its Central Banking Series and organized a five-continent dialogue held in Philadelphia, Paris, Zambia (Livingstone), Hanoi, Singapore, Prague, Cape Town, Shanghai, Hong Kong, Rome, Milan, Tallinn, and Santiago, Chile. He has received the Global Citizen Award from GIC for his efforts.

Mr. Kotok is a member of the National Business Economics Issues Council (NBEIC), the National Association for Business Economics (NABE) and served on the Research Advisory Board of BCA Research. Mr. Kotok has served as a Commissioner of the Delaware River Port Authority (DRPA) and on the Treasury Transition Teams for New Jersey Governors Kean and Whitman. He has also served as a board member of the New Jersey Economic Development Authority and as Chairman of the New Jersey Casino Reinvestment Development Authority. He has authored or co-authored four books, including the best selling Second edition of "From Bear to Bull with ETFs," now available at Amazon and the soon to be released "Adventures in Muniland."

## **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to David R. Kotok for providing advisory services.

## **ITEM 6 – Supervision**

The person responsible for supervising Mr. Kotok is Therese M. Pantalone, Managing Dir. /Compliance Officer (CO). The CO can be reached at 800-257-7013, extension 315. Mr. Kotok is also supervised by the Board of Directors of Cumberland Advisors. As the Compliance officer Mrs. Pantalone reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

**CUMBERLAND ADVISORS®**  
**ADV PART 2 B**

**ITEM 1 – COVER PAGE – Executive Vice President, Director of Fixed Income**

- A.
1. **JOHN R. MOUSSEAU**, CFA<sup>1</sup>, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, extension 307.
  2. Cumberland Advisors, 2 N Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 09/15/2015.
- B. This brochure supplement provides information about John R. Mousseau that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315, if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.
- Additional information about John R. Mousseau is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 2 – Educational Background and Business Experience**

Mr. Mousseau joined Cumberland in 2000 and is the Executive Director of the Fixed Income department. In this capacity, John and his team manage portfolio construction, management, analysis, trading, and research for both tax-free and taxable bond accounts. From 1993 to 2000 John was Portfolio Manager and Director of Municipal Bond Investments for Lord Abbett & Company. Prior to that, he served as First Vice President and Director of Municipal Portfolio Analysis for Shearson Lehman Brothers and a predecessor firm, E.F. Hutton, from 1981 to 1993. Mr. Mousseau holds an A.B. degree in economics from Georgetown University and an M.A. degree in economics from Brown University. His date of birth is 9/18/1956.

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<sup>1</sup> The **Chartered Financial Analyst** (CFA) designation is an international [professional certification](#) offered by the [CFA Institute](#) (formerly AIMR) to [financial analysts](#) who complete a series of three [examinations](#). To become a **CFA Charterholder** candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

A holder of the Chartered Financial Analyst designation, Mr. Mousseau is a member of the Philadelphia Council for Business Economists (PCBE), the National Federation of Municipal Analysts (NFMA), the National Association of Business Economics (NABE), the Washington Area Money Managers (WAMM), and the National Economists Club (NEC). He is also a member of the New York Society of Securities Analysts, where he served on the Society's High Net Worth Investors Committee, and is a past chair of the Municipal Bond Buyers Conference. In addition, he has served as an instructor at the New York Institute of Finance and Bond Market Association

His comments and analyses have appeared in The Bond Buyer, Barron's, the Wall Street Journal, Bloomberg, Forbes, the New York Times, the San Francisco Chronicle, and the Newark Star-Ledger. In addition, he has appeared on Bloomberg Radio and Television, Reuters, and CNBC for commentary on fixed-income markets. He has also been a speaker at various industry conferences, and a guest lecturer at Florida International University

Mr. Mousseau resides in Sarasota, FL, and is active in alumni affairs at Georgetown University.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to John Mousseau for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Mousseau is David R. Kotok, CEO. He can be reached at 800-257-7013, extension 320. The Compliance officer (CO) reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client.

The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised person has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted there under. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised person gives to its clients.



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**ITEM 1 – COVER PAGE –Vice Chairman, Chief Monetary Economist, IA Representative**

- A.     1. **ROBERT EISENBEIS**, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 311
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015.
- B.     This brochure supplement provides information about Robert Eisenbeis that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland’s brochure or if you have any questions about the contents of this supplement.
- Additional information about Robert Eisenbeis is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 2 – Educational Background and Business Experience**

Dr. Robert A. Eisenbeis joined the firm in 2007 and serves as Vice Chairman and Cumberland Advisors’ Chief Monetary Economist. In this capacity, he advises Cumberland’s asset managers on developments in US financial markets, the domestic economy and their implications for investment and trading strategies.

Dr. Eisenbeis was formerly Executive Vice-President and Director of Research at the Federal Reserve Bank of Atlanta until 2007. Prior to joining the Atlanta Fed in May 1996, Dr. Eisenbeis was the Wachovia Professor of Banking at the Kenan-Flagler School of Business at the University of North Carolina at Chapel Hill. Previously, he was Senior Deputy Associate Director in the Division of Research and Statistics at the Board of Governors of the Federal Reserve System and served as Assistant Director of Research and Chief of the Financial and Economic Research Section at the FDIC.

He holds a Ph.D. and M.S. degree from the University of Wisconsin and a B.S. degree from Brown University. His date of birth is 4/7/41.

### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

Dr. Eisenbeis's research has focused on monetary policy and issues pertaining to credit scoring, banking, and finance. His more than 100 articles have appeared in such leading publications as the Journal of Finance; the Journal of Financial Services Research; the Journal of Money, Credit, and Banking; the Journal of Banking and Finance; Banking Law Journal; and the Journal of Regulatory Economics. His work has also appeared in several Federal Reserve Bank publications, as well as the Journal of Retail Banking Services and other trade journals. Dr. Eisenbeis has coauthored and/or edited five books on banking and statistics and contributed chapters to other books and was the executive editor of the Journal of Financial Services Research. He presently serves on the editorial boards of several scholarly journals. Current research has focused on the development of methods for evaluating the forecasting performance of economic forecasters, which is being used by USA Today and the Wall Street Journal, and on the implications for financial stability of the regulatory framework being implemented in the United States and European Union. In 2004 he was named a Fellow by the National Association for Business Economics. He is also a Fellow of the Wharton Financial Institutions Center, a member of the Shadow Financial Regulatory Committee and the Financial Economists Roundtable. Most recently he has appeared frequently on Fox Business, CNBC and Bloomberg TV and radio commenting on current economic policy developments.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Mr. Eisenbeis for providing advisory services.

## **ITEM 6 – Supervision**

The person responsible for supervising Mr. Eisenbeis is David Kotok. He can be reached at 800-257-7013, extension 320. The Compliance officer (CO) reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice

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**ITEM 1 – COVER PAGE – Chief Global Economist**

- A.     1. **WILLIAM (BILL) WITHERELL** 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, extension 338.
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015.
- B.     This brochure supplement provides information about William Witherell that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

Bill Witherell joined Cumberland Advisors as Chief Global Economist in November 2005 as the Chief Global Economist. Dr. Witherell is a graduate of Colby College and holds an M.A. and a Ph.D. in Economics from Princeton University. Dr. Witherell began his career as a business economist with Exxon and Esso Eastern (1967-73), where he held positions in the economics, treasury and corporate planning functions. He moved to the international economic and financial relations field in 1973 with positions first in the U.S. Department of State and then in the Department of the Treasury (1974-77) as Director of the Office of Financial Resources and Energy Finance. He joined the Secretariat of the OECD in Paris, France, in 1977. From 1989 through September 2005 he was OECD's Director for Financial and Enterprise Affairs. His date of birth is 3/29/1941.

### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

He is a past Chairman of the International Roundtable of the National Association for Business Economics, a member of the Boston Economic Club and the Westborough MA Rotary.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to William Witherell for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Dr. Witherell is Michael McNiven, Managing Director, International and Global ETF Portfolio Manager. He can be reached at 800-257-7013, extension 316. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Managing Director, International and Global ETF  
Portfolio Manager**

- A.     1. **MICHAEL D. MCNIVEN**, 2 N. Tamiami Trail, Suite 303, Sarasota FL 34236
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015.
- B.     This brochure supplement provides information about Michael D. McNiven that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.
- Additional information about Michael D. McNiven is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 2 – Educational Background and Business Experience**

Dr. Michael D. McNiven serves as a Managing Director and a Portfolio Manager for Cumberland's international and global equity portfolio styles. He is also an Investment Advisor Representative for the firm explaining all of Cumberland's investment options to individual and institutional clients. He joined Cumberland Advisors in April of 2009.

Dr. McNiven was formerly a university professor at Rowan University prior to joining Cumberland Advisors. He has taught courses and assisted at Rowan University, University of Georgia, Utah Valley University, and Brigham Young University. He began his career at the Financial Times in New York working in market research, business development and advertising sales. He is a graduate of Brigham Young University in Provo, Utah for both B.A. and M.A. degrees, and also holds a Ph.D. from the University of Georgia in Athens. His date of birth is 8/15/1973.

### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

Dr. McNiven is not involved in any other business activities.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Michael McNiven for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Dr. McNiven is David R. Kotok, CEO. He can be reached at 800-257-7013, extension 320. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Vice President, Research and Tax-Free Municipal Fixed-Income Portfolio Manager**

- A.     1. **MICHAEL COMES, CFA**<sup>2</sup> 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 313
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015.
- B.     This brochure supplement provides information about Michael Comes that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

Michael Comes joined Cumberland in 2008 as a Research Associate for the tax-exempt bond portfolio. He became a Vice President, assistant portfolio manager on the tax-exempt municipal and taxable fixed-income portfolios in 2012. He holds a B.A. in Economics from Dickinson Collage and obtained the Chartered Financial Analyst designation in Sept. 2012. His date of birth is 10/18/85.

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<sup>2</sup> The **Chartered Financial Analyst** (CFA) designation is an international [professional certification](#) offered by the [CFA Institute](#) (formerly AIMR) to [financial analysts](#) who complete a series of three [examinations](#). To become a **CFA Charterholder** candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.



### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

Mr. Comes is not involved in any other business activities.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Mr. Comes for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Comes is John Mousseau. He can be reached at 800-257-7013, extension 307. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Vice President, Taxable Fixed Income Trading and Portfolio Manager**

- A.     1. **NANNETTE SABO** 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 313
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015.

B.     This brochure supplement provides information about Nannette Sabo that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

Nannette L. Sabo joined Cumberland Advisors in 2012. She began her career in capital markets in 1993 with First Union Trust Operations and Derivatives P&L reporting. Ms. Sabo has also worked for Raymond James Financial as a registered representative for Institutional Taxable Fixed Income Sales and as Vice President for Institutional Debt Capital Market Sales with Cantor Fitzgerald and SMH Capital. Ms. Sabo has held various positions in capital markets sales and trading, but has focused her career within fixed-income markets.

Ms. Sabo holds a Bachelor of Science in Business Administration from the University of North Carolina at Charlotte, a Master of Business Administration from Nova Southeastern University, and a Master of Science in Accounting from Kaplan University. Ms. Sabo graduated with honors from both her MBA and MSA programs. Her date of birth is 12/26/68.

### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

Ms. Sabo is not involved in any other business activities.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Ms. Sabo for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Ms. Sabo is John Mousseau. He can be reached at 800-257-7013, extension 307. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Sr. Vice President, Portfolio Manager – Tactical Trend and Strategic Commodity Portfolio Manager**

- A.     1. **MATTHEW C. McALEER** 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 346
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015

B. This brochure supplement provides information about Matthew C. McAleer that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

Mr. McAleer joined Cumberland in February, 2014. He serves as Sr. Vice President and Portfolio Manager for US and International Equities, including the Tactical Trend Allocation Style. With a focus on quantitative research, Mr. McAleer uses detailed trend and relative strength analysis to manage portfolio construction and identify investment opportunities across multiple asset classes. Matt has over 20 years of investment management experience and previously led the tactical asset allocation strategies at Hudson Canyon Investment Counselors and Classic Asset Management.

Mr. McAleer holds a BS degree in marketing/economics from Rider University, where he also competed for the wrestling team. His date of birth is 04/19/1965.

### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

Mr. McAleer is not involved in any other business activities.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Mr. McAleer for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Mr. McAleer is David Kotok. He can be reached at 800-257-7013, extension 320. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Master Limited Partnership and Strategic  
Commodity Portfolio Manager**

- A.     1. **DONNA MARIE VALLES** 2 N. Tamiami Trail, Suite 303, Sarasota, FL  
34236, 800-257-7013, ext. 336
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015
- B.     This brochure supplement provides information about Donna Marie Valles that  
supplements the Cumberland Advisors brochure (ADV Part 2A). You should have  
received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013,  
extension 315 if you did not receive Cumberland's brochure or if you have any questions  
about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

Ms. Valles joined Cumberland in January, 2008. She serves as an Equity Analyst and Portfolio Manager for the Master Limited Partnership and Strategic Commodity styles.

Ms. Valles holds a BA in Finance from the University of South Florida and an AS in Mathematics and Computer Science from Cumberland County College. Her date of birth is 03/30/1989.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

**ITEM 4 – Other Business Activities**

Ms. Valles is not involved in any other business activities.

## **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Ms. Valles for providing advisory services.

## **ITEM 6 – Supervision**

The person responsible for supervising Ms. Valles is David Kotok. He can be reached at 800-257-7013, extension 320. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Vice President and Portfolio Manager**

- A.     1. **ROBERT R. MALVENDA**- 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, extension 332
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015
- B.     This brochure supplement provides information about Robert R. Malvenda that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

Robert Malvenda joined Cumberland Advisors as a Vice President and Portfolio Manager in 2014. He has over 33 years experience in the Municipal Securities Industry. As a Director at Citigroup and its predecessor firms (Smith Barney, Lehman Brothers, Shearson and E.F. Hutton), he was the Sales and Marketing Manager for the Midwest Division. He managed highly effective Product Specialists who provide service to Financial Advisors, Private Bankers and Investment Counselors.

Having worked in four major regions (New York, Boston, Los Angeles and Chicago), Mr. Malvenda has the credit knowledge and experience in creating, customizing and executing municipal portfolios. At Cumberland, he will focus in servicing the Midwest part of the country.

Mr. Malvenda graduated from Woodbury University with a Bachelor of Science degree in Business Administration. His date of birth is 11/02/1955



### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

Ms. Malvenda is not involved in any other business activities.

### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Mr. Malvenda for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Malvenda is John Mousseau He can be reached at 800-257-7013, extension 307. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Fixed Income Portfolio Manager and Research Analyst**

- A.
1. **SHAUN BURGESS** 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 319
  2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 09/15/2015

B. This brochure supplement provides information about Shaun Burgess that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.

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

**ITEM 2 – Educational Background and Business Experience**

Mr. Burgess joined Cumberland in June 2013. His responsibilities include analysis of prospective tax exempt and taxable portfolios, trading of tax exempt securities on Cumberland's fixed income desk, and assisting in department operations. Additionally, he is responsible for updating research material for Cumberland's fixed income and equity trading desks and also assists Cumberland's Vice President of Research, Michael Comes, with credit research relating to current and prospective tax exempt bond holdings..

Mr. Burgess holds a BA in Finance from the University of South Florida and His date of birth is 12/21/1981.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

## **ITEM 4 – Other Business Activities**

Mr. Burgess is not involved in any other business activities.

## **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Mr. Burgess for providing advisory services.

## **ITEM 6 – Supervision**

The person responsible for supervising Mr. Burgess is John Mousseau. He can be reached at 800-257-7013, extension 307. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – COVER PAGE – Taxable Fixed Income Portfolio Manager and Trader**

- A.     1. **DANIEL HIMELBERGER**- 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 343
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 09/15/2015
- B.     This brochure supplement provides information about Daniel Himelberger that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.
- Additional information about Daniel Himelberger is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 2 – Educational Background and Business Experience**

Mr. Himelberger joined Cumberland in July, 2013. His responsibilities include assisting with the management of taxable accounts, trading of taxable bonds on Cumberland's fixed income desk, and assisting with department operations. Additionally, he assists with client requests and logging trading history.

Mr. Himelberger holds a BA in Finance from the University of South Florida. His date of birth is 4/13/1985.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

#### **ITEM 4 – Other Business Activities**

Mr. Himelberger is not involved in any other business activities.

#### **ITEM 5 - Additional Compensation**

No one who is not a client provides an economic benefit to Mr. Himelberger for providing advisory services.

#### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Himelberger is John Mousseau.. He can be reached at 800-257-7013, extension 307. The Compliance officer (CO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Each of the supervised persons is bound by Cumberland's Code of Ethics, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Cumberland's supervised persons. In addition, each of the supervised persons has received a copy of and reviewed Cumberland's Investment Adviser Compliance Manual, which was reasonably designed to prevent any violation of the Advisers Act or the rules that the SEC has adopted thereunder. Cumberland believes that the Code of Ethics and the Compliance Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ADV PART 2 B**

**ITEM 1 – COVER PAGE – Sub-Advisor/Master Limited Partnerships**

- A.     1. **Richard Daskin**, CFA<sup>3</sup>, CFP®<sup>4</sup>
2. RSD Advisors, LLC sub-advisor to Cumberland Advisors,  
          <http://www.rsdadvisors.net/>
3. Supplement dated 09/15/2015
- B.     This brochure supplement provides information about Richard Daskin that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Therese M. Pantalione, 800-257-7013, extension 315, if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement.
- Additional information about Richard Daskin is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

**ITEM 2 – Educational Background and Business Experience**

Richard Daskin CFA, CFP® is the CIO for RSD Advisors, LLC a registered investment advisor based in New York City. Mr. Daskin has over 30 years experience on both the "buy" and "sell" side of Wall Street in fixed income and investment management and has been a research analyst, trader, portfolio manager, and salesperson. Mr. Daskin formerly worked at the Goldstein Capital

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<sup>3</sup> The **Chartered Financial Analyst** (CFA) designation is an international [professional certification](#) offered by the [CFA Institute](#) (formerly AIMR) to [financial analysts](#) who complete a series of three [examinations](#). To become a **CFA Charterholder** candidates must pass each of three six-hour exams, possess a bachelor's degree from an accredited institution (or have equivalent education or work experience) and have 48 months of qualified, professional work experience. CFA charterholders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

<sup>4</sup> **Certified Financial Planner**. (CFP®). To attain the right to use the CFP® marks, an individual must complete an advanced college-level course of study addressing the financial planning subject areas, including insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning; and attain a Bachelor's Degree from a regionally accredited United States college or university (or its equivalent from a foreign university). They must also pass the comprehensive CFP® Certification Examination. The examination, administered in 10 hours over a two-day period, 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. Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and 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 ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks.

hedge fund, as well as First Albany Capital, DLJ, Alex Brown, Lazard Frères, Chemical Bank and US Trust Company of New York. He recently wrote a chapter for the book, "Investing in the High Yield Municipal Market: How to Profit from the Current Credit Crisis and earn Attractive Tax Exempt Interest Income". Mr. Daskin has a B.A. in Economics from the University at Albany. He is a holder of a Chartered Financial Analyst designation and is a member of the New York Society of Securities Analysts. He has also obtained a Certified Financial Planner designation and a life and health insurance broker's license. Date of Birth 5/20/1957.

### **ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

### **ITEM 4 – Other Business Activities**

Mr. Daskin has been an instructor at the New York Institute of Finance.

### **ITEM 5 - Additional Compensation**

RSD Advisors, LLC offers financial planning services, investment management services and insurance services and is compensated by RSD Advisors clients for these services accordingly.

### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Daskin is David R. Kotok, CEO. He can be reached at 800-257-7013, extension 320. The Compliance officer (CO) reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CO also reviews marketing literature and e-mail sent to and from clients. The CO then reports to the CEO. Mr. Daskin is bound by the Code of Ethics of RSD Advisors, LLC, which, among other things, sets forth certain policies and procedures aimed at preventing abusive practices by Mr. Daskin. RSD Advisors LLC and Cumberland Advisors are separate entities with no shared management or ownership. The Code of Ethics of RSD Advisors is available upon request..