



**CUMBERLAND**  
ADVISORS

**CUMBERLAND ADVISORS**  
**ADV PART 2B**  
Revised 12/31/2021  
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**ITEM 1 – TITLE - Chairman, CIO, & Portfolio Manager**

- 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 01/25/2017
- 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 Timothy J. Lyle, 800-257-7013, extension 350 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. His date of Birth is 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.

As CIO, Mr. Kotok is co-manager on all portfolio styles. 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: "From Bear to Bull with ETFs," and "Adventures in Muniland."

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

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

#### **ITEM 6 – Supervision**

Day-to-day oversight of Mr. Kotok will be performed by President John Mousseau and CCO Timothy Lyle. They can be reached at: 800-257-7013. Mr. Kotok is also supervised by the Board of Directors of Cumberland Advisors. A Compliance Officer reviews and monitors individual accounts to ensure that they match the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – TITLE – President, Chief Executive Officer & Director of Fixed Income**

- A.     1. JOHN R. MOUSSEAU, CFA,<sup>1</sup> President, CEO - 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 01/25/17.
- 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 Timothy J. Lyle, 800-257-7013, extension 350, 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 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.

**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 as a past chair of the

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<sup>1</sup> The Chartered Financial Analyst® 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® Charter holder 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® charter holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.

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 Mr. Mousseau for providing advisory services.

#### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Mousseau is Chairman David R. Kotok. He can be reached at: 800-257-7013, extension 320. A Compliance Officer (“CO”) reviews and monitors individual accounts to ensure that they match the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised person gives to its clients.

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**ITEM 1 – TITLE –Vice Chairman, Chief Monetary Economist**

- 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 01/25/2017.

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 Timothy J. Lyle, 800-257-7013, extension 350 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’ 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 Dr. Eisenbeis for providing advisory services.

#### **ITEM 6 – Supervision**

The person responsible for supervising Dr. Eisenbeis is David Kotok. He can be reached at: 800-257-7013, extension 320. A Compliance officer (“CO”) reviews and monitors individual accounts to ensure that they meet the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice

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**ITEM 1 – TITLE – 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 01/25/2017.
- 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 Timothy J. Lyle, 800-257-7013, extension 350 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**

Dr. Bill Witherell joined Cumberland Advisors 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 Dr. Witherell for providing advisory services.



## **ITEM 6 – Supervision**

The person responsible for supervising Dr. Witherell is Senior Vice President Dr. Michael McNiven. He can be reached at: 800-257-7013, extension 316. A Compliance Officer (“CO”), reviews and monitors individual accounts to ensure that they meet the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – TITLE – Senior Vice President Business Development**

- 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 01/25/2017.
- 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 Timothy J. Lyle, 800-257-7013, extension 350 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 Senior Vice President Business Development and Investment Advisor Representative. 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 Dr. McNiven for providing advisory services.

**ITEM 6 – Supervision**

The person responsible for supervising Dr. McNiven is President John Mousseau. He can be reached at: 800-257-7013, extension 320. A Compliance Officer (“CO”), reviews and monitors individual accounts to ensure that they reflect the investment objective of each particular client.

A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – TITLE – Executive Vice President, Director of Equity Strategies & 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 01/25/2017

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 Timothy J. Lyle, 800-257-7013, extension 350 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 Executive Vice President and Director of Equity Strategies for all US and International Equity ETF styles. 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 President John Mousseau. He can be reached at: 800-257-7013, extension 307. A Compliance Officer (“CO”), reviews and monitors

individual accounts to ensure that they meet the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – TITLE – 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 01/25/2017

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 Timothy J. Lyle, 800-257-7013, extension 350 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: [ww.adviserinfo.sec.gov](http://ww.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 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 President John Mousseau. He can be reached at: 800-257-7013, extension 307. A Compliance Officer (“CO”), reviews and monitors individual accounts to ensure that they reflect the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – TITLE – 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 01/25/2017

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 Timothy J. Lyle, 800-257-7013, extension 350 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 President John Mousseau. He can be reached at: 800-257-7013, extension 307. A Compliance Officer (“CO”), reviews and monitors individual accounts to ensure that they reflect the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – TITLE – Market Volatility/Leveraged Market Volatility ETF Portfolio Manager**

- A.
1. GAOLE “LEO” CHEN- 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 312
  2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 01/25/2017

B. This brochure supplement provides information about Gaole “Leo” Chen that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy J. Lyle, 800-257-7013, extension 350 if you did not receive Cumberland’s brochure or if you have any questions about the contents of this supplement. Additional information about Gaole “Leo” Chen 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. Leo Chen joined Cumberland Advisors as a consultant in 2014 and became a quantitative analyst for the firm in November 2015. Dr. Chen is an investment adviser representative. He is also an assistant professor of finance at the University of Southern Mississippi. He was born in Mainland China. Prior to coming to the United States, he studied in Italy.

Dr. Chen specializes in quantitative analysis, particularly in time-series empirical research. He also works in areas such as stochastic calculus and Brownian motion. His research utilizes quantitative methods to examine market returns and underlying volatilities. His studies span both equity and fixed income markets.

Dr. Chen holds a Ph.D. degree in finance from the University of South Florida and a B.A. degree in economics from the University of Rochester. He is currently a CFA® Level II candidate. In 2010, he was a research scholar in mathematics at the Fields Institute for Research in Mathematical Sciences. His date of birth is 10/18/86.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

**ITEM 4 – Other Business Activities**

Dr. Chen is an assistant professor at the University of South Florida.

**ITEM 5 - Additional Compensation**

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

## **ITEM 6 – Supervision**

The person responsible for supervising Dr. Chen is Executive Vice President Matt McAleer. He can be reached at 800-257-7013, extension 346. A Compliance Officer ("CO"), reviews and monitors individual accounts to ensure that they reflect the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

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**ITEM 1 – TITLE – Investment Advisor Representative**

- A.     1. CHRISTOPHER L. DRAGO- 1110 Hacienda Place, Los Angeles, CA. 90069   800-257-7013, ext. 373
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
3. Supplement dated 01/21/2021

B.     This brochure supplement provides information about Christopher L. Drago that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy Lyle, 800-257-7013, extension 350 if you did not receive Cumberland’s brochure or if you have any questions about the contents of this supplement. Additional information about Christopher L. Drago is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Chris Drago serves as Regional Director of Investments for the West Coast region. As an Investment Advisor Representative, Chris represents the firm to financial advisors, institutions and individuals. He joined Cumberland Advisors in 2020 and has over 25 years of industry experience.

Prior to joining the firm, Chris was Vice President of Municipal Sales and Portfolio Management at Citi. There, he specialized in the marketing and sale of municipal bonds to Citi’s Personal Wealth Management and Private Bank Financial Advisors. Chris has also worked at Morgan Stanley in New York City, where he worked on their U.S. Government Institutional Desk and the Municipal Bond Desk and later managed their Municipal Bond Desk in Los Angeles. He attended Southern Connecticut State University. His date of birth is 07/10/1962.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

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

Mr. Drago 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. Drago for providing advisory services.

#### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Drago 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.

CUMBERLAND ADVISORS  
ADV PART 2B

**ITEM 1 – TITLE – Sr. Vice President, Fixed Income Research and Portfolio Manager**

- A.
1. PATRICIA HEALY, CFA<sup>2</sup> - 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 349
  2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 01/25/2017

B. This brochure supplement provides information about Patricia Healy that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy J. Lyle, 800-257-7013, extension 350 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement. Additional information about Gabriel Hament 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. Healy joined Cumberland in July 2016 as Sr. Vice President of Research and Fixed Income Portfolio Manager. Previously Ms. Healy was Sr. Director-Financial Institutions and Sovereigns with Bayern LB, New York. She earned her B.S. in Finance at the State University of New York. She earned her CFA® designation in 2000. Her date of birth is 4/1/1961.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

**ITEM 4 – Other Business Activities**

Ms. Healy 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. Healy for providing advisory services.

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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 6 – Supervision**

The person responsible for supervising Ms. Healy is President John Mousseau. He can be reached at: 800-257-7013, extension 307. A Compliance Officer (“CO”), reviews and monitors individual accounts to ensure that they reflect the investment objective of each particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

CUMBERLAND ADVISORS  
ADV PART 2B

**ITEM 1 – Title – Regional Director of Investments, IA Representative**

- A.
1. MICHAEL G. BLACKMON, CFA<sup>3</sup>- 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 349
  2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 01/25/2017

B. This brochure supplement provides information about Michael G. Blackmon that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy J. Lyle, 800-257-7013, extension 350 if you did not receive Cumberland’s brochure or if you have any questions about the contents of this supplement. Additional information about Michael G. Blackmon 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. Blackmon joined Cumberland in October, 2016 as Regional Director of Investments. Previously he was CIO of Banyan Partners, Palm Beach Gardens, Florida. He earned his B.S. in Business Administration from the University of North Carolina in 1977. He earned his CFA® designation in 1985. His date of birth is 03/25/1955.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

**ITEM 4 – Other Business Activities**

Mr. Blackmon 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. Blackmon for providing advisory services.

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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® Charter holder 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® charter holders are also obligated to adhere to a strict Code of Ethics and Standards governing their professional conduct.



## **ITEM 6 – Supervision**

The person responsible for supervising Mr. Blackmon is Senior Vice President, Dr. Michael McNiven. He can be reached at 800-257-7013, extension 316. A Compliance Officer (CO) reviews and monitors individual accounts to ensure that they match the investment objective of the particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

CUMBERLAND ADVISORS  
ADV PART 2B

**ITEM 1 – Title – Investment Advisor Representative**

- A.
1. THERESE M. PANTALIONE - 614 Landis Ave, Vineland, NJ 08360 800-257-7013, ext. 315
  2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 01/18/2017

B. This brochure supplement provides information about Therese M. Pantalione that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy Lyle, 800-257-7013, extension 350 if you did not receive Cumberland's brochure or if you have any questions about the contents of this supplement. Additional information about Therese M. Pantalione is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Mrs. Pantalione joined Cumberland in May 1986 and has performed Municipal Research, and assisted with the Consulting services to municipalities. Since 1998, she has been the Compliance Officer in the firm as well as a managing director. Currently she provides investment advisory services to Cumberland's clients in our New Jersey office as well as acting as a compliance consultant. Her date of birth is 03/23/1951.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

**ITEM 4 – Other Business Activities**

Mrs. Pantalione is not involved in any other business activities.

**ITEM 5 - Additional Compensation**

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

## **ITEM 6 – Supervision**

The person responsible for supervising Mrs. Pantalone is Senior Vice President Dr. Michael McNiven. He can be reached at 800-257-7013, extension 316. A Compliance Officer (CO) reviews and monitors individual accounts to ensure that they match the investment objective of the particular client. A 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 Policies and Procedures 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 Policies and Procedures Manual are useful tools for monitoring the advice that its supervised persons give to its clients.

CUMBERLAND ADVISORS  
ADV PART 2 B

**ITEM 1 – Title – Regional Director of Investments**

- A.     1. TODD E. ENGELHARDT, 2 N. Tamiami Trail, Suite 303, Sarasota, FL, 34236, 800-257-7013, extension 371  
       2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236  
       3. Supplement dated 12/10/2019

B.     This brochure supplement provides information about Todd Engelhardt that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy Lyle, 800-257-7013, extension 350 if you did not receive Cumberland’s brochure or if you have any questions about the contents of this supplement. Additional information about Todd Engelhardt 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. Engelhardt serves as Regional Director of Investments for southwest Florida. Prior to joining Cumberland, Todd held senior positions in distribution and marketing with FleetBoston, Manning & Napier Advisors, and Fifth Third. While at Fleet, he served as National Sales Director in Fleet’s Columbia Management Group subsidiary, with responsibility for Endowment and Foundation business development. Todd also assisted in Columbia’s integration of Boston-based Liberty Asset Management, as well as a host of smaller bank investment unit acquisitions. He began his career with the management information systems consulting practice of Arthur Andersen & Co. in New York City. Todd received an MBA from Rensselaer Polytechnic Institute in 1984. His date of birth is 10/21/1960.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

**ITEM 4 – Other Business Activities**

Mr. Engelhardt 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. Engelhardt for providing advisory services.

**ITEM 6 – Supervision**

The person responsible for supervising Mr. Engelhardt is Matthew C. McAleer. Matt can be reached at 800-257-7013, extension 346. The Chief Compliance Officer (CCO), reviews and monitors individual accounts to ensure that they meet the investment objective of the particular client. The CCO also reviews marketing literature and e-mail sent to and from clients. The CCO 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.

CUMBERLAND ADVISORS  
ADV PART 2B

**ITEM 1 – TITLE – Investment Advisor Representative**

- A. 1. ANDREW D. CRAWFORD – 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, extension 366  
2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236  
3. Supplement dated 01/22/21

B. This brochure supplement provides information about Andrew D. Crawford that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy Lyle, 800-257-7013, extension 350 if you did not receive Cumberland’s brochure or if you have any questions about the contents of this supplement. Additional information about Andrew Crawford 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. Crawford joined Cumberland in August, 2019. Before joining Cumberland, Mr. Crawford served as Vice President of Municipal Sales for Suntrust, Wells Fargo, and Wachovia Banks. Andrew received his B.A. in Economics in 2002 from Hampden-Sydney College. His date of birth is 06/15/79.

**ITEM 3 – Disciplinary Information**

There is no disciplinary information to report on this person.

**ITEM 4 – Other Business Activities**

Mr. Crawford 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. Crawford for providing advisory services.

**ITEM 6 – Supervision**

The person responsible for supervising Mr. Crawford is John Mousseau. He can be reached at 800-257-7013. 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.

**CUMBERLAND ADVISORS  
ADV PART 2B**

**ITEM 1 – Title – Wealth Management Associate**

- A.
1. CHARLES W. METZLER, CFP® - 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236, 800-257-7013, ext. 345
  2. Cumberland Advisors, 2 N. Tamiami Trail, Suite 303, Sarasota, FL 34236
  3. Supplement dated 02/24/2020
- B. This brochure supplement provides information about Charles W. Metzler that supplements the Cumberland Advisors brochure (ADV Part 2A). You should have received a copy of that brochure. Please contact Timothy Lyle, 800-257-7013, extension 350 if you did not receive Cumberland’s brochure or if you have any questions about the contents of this supplement. Additional information about Charles W. Metzler is available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

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

Charles Metzler is a Wealth Management Associate with Cumberland Advisors since joining the firm in 2020. Charles provides support for the firm’s Investment Advisor Representatives and Regional Directors of Investment and serves as a resource for clients and prospects. He is responsible for providing client support, developing client portfolio risk analysis as well as aligning client investment objectives and risk tolerance within Cumberland’s investment strategies. He also assists in providing consistency in investment allocation and the overall client experience. He was previously employed by RiverSource Life Insurance Company/Ameriprise Financial, where he provided direct support and problem resolution to both financial advisors and clients.

Charles attended the University of Missouri where he received a Bachelor of Arts degree in Interdisciplinary Studies, with a focus on financial planning, as well as a minor in Business. He is a CFP® Professional and a 2022 Level II Candidate in the CFA Program.



He has also participated in the IRS Volunteer Income Tax Assistance and Tax Counseling for the Elderly (VITA/TCE) programs. His date of birth is 07/30/1994.

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

There is no disciplinary information to report on this person.

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

Mr. Metzler 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. Metzler for providing advisory services.

### **ITEM 6 – Supervision**

The person responsible for supervising Mr. Metzler is Matthew McAleer. He can be reached at 800-257-7013, extension 346. 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.