



CUMBERLAND ADVISORS ADV PART 3

Form CRS

Item 1 Introduction

12/31/2021

Cumberland Advisors is registered with the Securities and Exchange Commission as an Investment Adviser. Brokerage activities and investment advisory services and fees differ, and it is important for you to understand the differences. The SEC offers free and simple tools to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS) which also provides information tailored to educate retail investors about financial professionals.

Item 2 Relationships and Services

What investment services and advice can you provide me? Our firm offers the following principal investment advisory services to retail investors.

Our firm provides investment discretion for the following services. If you invest on a discretionary basis, our firm will buy and sell investments in your accounts without requiring your pre-approval on an ongoing basis until you notify us in writing to switch.

- Portfolio management—monitored continuously as part of our standard service.
- Buying and selling securities—monitored continuously as part of our standard service.
- Investment recommendations—monitored continuously as part of our standard service.

\$250,000 for Equity accounts, \$500,000 for Fixed Income accounts.

For additional information including minimum investment amounts, please see www.cumber.com or <https://www.adviserinfo.sec.gov/IAPD/default.aspx> for our Form ADV, 2A brochure (Items 4 and 7 of Part 2A or Items 4.A. and 5 of Part 2A Appendix 1).

Conversation starters. *Ask your financial professional: – Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? – What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

Item 3 Fees, Costs, Conflicts and Standard of Conduct

What fees will I pay? Our fees can be assessed quarterly and are disclosed in our Form ADV Part 1A, Item 5.E. and more fully described in our Form ADV Part 2A, Items 5.A., B., C., and D. Some fees create a conflict of interest described below and in more detail in our Firm's Part 2A.

- If our firm charges you asset based fees, more assets in the account will cause you to pay more in fees and therefore we may have an incentive to encourage you to increase the amount of money invested in those accounts.

Additional Information: You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure.

Conversation starters. *Ask your financial professional: – Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have? *When we act as your investment adviser, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are examples to help you understand what this means.*

Our firm makes money by offering products and services to you that we in turn earn money on and therefore have an incentive to sell these products to you.

Conversation starters. *Ask your financial professional: – How might your conflicts of interest affect me, and how will you address them?*

Additional information: For more detailed information about our fees and costs please review our Form ADV, Part 2A brochure (specifically Items 5.A., B., C., and D.) which can be found at www.cumber.com or <https://www.adviserinfo.sec.gov/IAPD/default.aspx>.

How do your financial professionals make money?

Our professionals are compensated based on the amount of assets they service and therefore earn higher compensation for investing more of your money.

Base salary.

Item 4 Disciplinary History

Do you or your financial professionals have legal or disciplinary history?

Our firm has no disciplinary history. Visit Investor.gov/CRS for a free and simple search tool to research our firm and our financial professionals.

Conversation Starters. *Ask your financial professional: – As a financial professional, do you have any disciplinary history? For what type of conduct?*

Item 5 Additional Information

You can find additional information about our services and request a copy of the relationship summary by visiting www.cumber.com; emailing at tim.lyle@cumber.com or calling us at: 1.800.257.7013.

Conversation starters. *Ask your financial professional: – Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*