



Form CRS Client Relationship Summary
Cabana LLC *d/b/a* Cabana Asset Management
April 21, 2021

Item 1 – Introduction: Is an investment advisory account right for you?

Cabana LLC, doing business as Cabana Asset Management, is registered with the Securities and Exchange Commission as an investment adviser. Please be aware that brokerage and investment advisory services and fees differ and that it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://www.investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing.

Item 2 – What investment services and advice can you provide me?

Principal investment advisory services offered to retail investors include portfolio management and financial planning.

As part of our standard portfolio management services, we monitor your portfolio(s) on ongoing basis and provide regular supervisory and/or management services with respect to your account(s). Our portfolio management services are offered either on a *discretionary* basis or, in limited circumstances, on a *non-discretionary* basis. For most retail clients, the investment services we provide are *Discretionary* and administered through our proprietary Target Drawdown Professional Series of Portfolios. *Discretionary* authorization allows us to determine the specific securities, and the amount of securities, to be purchased or sold for your account without your approval prior to each transaction. You may limit our discretionary authority by providing us with your restrictions or guidelines in writing. *Non-discretionary* arrangements require us to obtain your approval prior to executing any transactions on behalf of your account. We do not monitor the investments made as a result of a financial plan unless you have hired us for portfolio management services. We do not limit our advice to proprietary products, or a limited menu of products or types of investments. We do not require a specific minimum account size to establish a relationship with us but investment in our proprietary products is subject to minimum investment amounts. However, we reserve the right to waive the minimum investment amount on a case by case basis.

For additional information regarding our services, please refer to [Items 4, 7, & 13 of our Form ADV Part 2A, available here.](#)

Conversation starters (additional follow up questions you may want to 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 – What fees will I pay?

We are primarily compensated by a percentage of assets under our management. Our fees vary depending on the services you receive and are negotiable depending upon the complexity and scope of the service, complexity of your financial circumstances, your objectives, and the amount of assets under management, among others.

Portfolio management fees are based upon a percentage of your assets under our management and are payable in arrears, on a monthly or quarterly basis depending on the custodian's billing practices. The more assets there are in your advisory account, the more you will pay in fees. Therefore, we have an incentive to encourage you to increase the assets in your account.

We may provide financial planning services, on a case by case basis, complementary to our investment advisory services. We reserve the right to charge hourly or fixed fees or other fee payment arrangement for financial planning services.

For additional information regarding our fees, please refer to [Item 5 of our Form ADV Part 2A, available here.](#)

Description of other fees and costs:

The fees that you pay to our firm for investment advisory services are separate and distinct from the fees and expenses charged by investment companies (e.g., mutual funds, exchange traded funds, unit investment trusts). These fees are described in each fund's prospectus. These fees will generally include a management fee and other fund expenses. You will also incur transaction charges and/or brokerage fees when purchasing or selling securities. These charges and fees are typically imposed by the broker-dealer or custodian that executes the trade. The broker-dealer or custodian may also charge your account for custodial fees, retirement account fees, trust fees, exchange fees, redemption fees that may be assessed on investment company shares, transfer fees, account termination fees or other special service fees and charges. We do not share in any portion of these fees imposed by the broker-dealer or custodian. To fully understand the total cost you will incur, you should review all the fees charged by investment companies, broker-dealers, our firm, and others. 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 additional information about fees charged by third parties, please refer to [Item 5 of Form ADV Part 2A, available here.](#)

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 some examples to help you understand what this means:

All investment advisers face conflicts of interest, which are inherent in the business. Our primary source of compensation is through asset based fees. Therefore, we are incentivized to acquire new clients and to increase assets under management. Other conflicts of interest result from other business activities we engage in and relationships we have with business partners and third parties, or affiliations we have established with other financial institutions.

We, or persons affiliated with our firm, serve as the general partner and/or manager of a private fund (e.g., hedge fund) that we may recommend to you. Cabana LLC serves as investment adviser to the private fund and charges a 1.25% advisory fee. If you invest in these proprietary private funds, we will receive management fees and/or performance-based fees from the fund. This creates a conflict of interest because we have an incentive to recommend the fund over other investments. While our firm is accountable to you and the fund as a fiduciary and, consequently, must exercise good faith and integrity in providing advisory services to both you and the fund, you should be aware of the potential for conflicts of interest. Investors in the fund should refer to the offering documents of the fund for detailed disclosures, associated costs, and conflicts. If you invest in private funds, proprietary or otherwise, you will pay management fees and/or performance-based fees. If you are invested in the fund, the value of your investment in the fund is not included in the calculation of your advisory fees for the management of other assets. We manage and/or recommend private funds that are charged performance-based fees while at the same time managing accounts (perhaps with similar objectives) that are not charged performance-based fees. As such, the "side-by-side management" of accounts with more favorable compensation might provide an incentive for our firm to favor accounts that pay performance-based fees. Performance-based fees also create an incentive for us to make investments that are riskier or more speculative than would be the case absent a performance fee arrangement.

Cabana serves as sub-advisor to a suite of ETFs ("Cabana ETFs") launched in partnership with private label ETF advisor Exchange Traded Concepts ("ETC") and is responsible for the Cabana ETF investment strategy. Cabana receives an asset management fee for its investment advisory services related to Cabana's ETFs. The investment strategy is Cabana ETFs similar to that of Cabana's other Target Drawdown products and are managed via Cabana's proprietary algorithm. Additionally, Cabana's Target Drawdown Professional Series of Portfolios primarily invest in Cabana's ETFs. Cabana has implemented procedures designed to disclose, minimize, and/or mitigate, as applicable, any conflicts arising from using its proprietary products within Cabana's portfolios or to minimize operational and trading issues, which may arise from operating similar strategies.

For further information on our conflicts of interest and how we address them, please refer to our [Form ADV Part 2A, available here](#).

How do your financial professionals make money?

Our financial professionals receive salary-based compensation and/or a percentage of advisory billings. Therefore, our financial professionals have an incentive to encourage you to increase the assets in your account. Some of our financial professionals are insurance agents, which creates a conflict of interest because these persons will receive additional commission-based compensation in connection with the purchase and sale of insurance products they sell to you. Financial professionals who are also lawyers or CPAs also receive separate fees for legal or accounting services that are separate and distinct from our advisory fees. You are not obligated to purchase insurance or utilize non-advisory services offered by any of our financial professionals.

Conversation starters (additional follow up questions you may want to 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?*
- *How might your conflicts of interest affect me, and how will you address them?*

Item 4 – Do you or your financial professionals have legal or disciplinary history?

Yes. Although our firm does not have a disciplinary record, some of our financial professionals have disciplinary and/or legal disclosures on their individual regulatory filings. All of those matters are resolved.

For a free, simple search tool to research us and our financial professionals please visit Investor.gov/CRS.

Conversation starters (additional follow up questions you may want to ask your financial professional):

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

Item 5 – Additional Information

For additional information about our advisory services, please refer to our [Form ADV Part 2A brochure, available here](#), and the individual Form ADV Part 2B brochure supplement(s) your representative provides. If you have any questions, need up-to-date information and/or need a copy of this Client Relationship Summary, please contact us at (479) 442-6464.

Conversation starters (additional follow up questions you may want to 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?*



Appendix A - Form CRS Client Relationship Summary
Cabana LLC *d/b/a* Cabana Asset Management

Material Changes to Client Relationship Summary

The purpose of this appendix is to inform you of any material changes since the previous version of this Form CRS dated **September 16, 2020**.

On **March 12, 2021**, we updated our response to Item 4 of the Form CRS to include the word "yes" in our affirmative response to the disclosures regarding whether we or our financial professionals have legal or disciplinary history. On **April 21, 2021**, we clarified Item 4 to note that all of those matters have been resolved.

If you have questions about these changes, you may contact us at (479) 442-6464.