Part 2A of Form ADV: Firm *Brochure*

Item 1 Cover Page

CAMBRIDGE
CAPE COD ADVISORS
BECAUSE LIVING LIFE WELL IS THE ULTIMATE REWARD.

128 Route 6A
Sandwich, Ma. 02563

Contact Information:
Gregory C. Fenton CFP, Principal
Phone: (508) 888-9300
Email: greg@cambridgecape.com
Website: http://www.cambridgecape.com

This brochure provides information about the qualifications and business practices of Cambridge Cape Cod Advisors ("CCCA"). If you have any questions about the contents of this brochure, please contact us at (508) 888-9300 or by email at: greg@cambridgecape.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

CCCA is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training. The oral and written communications of an Adviser provide you with information about which you determine to hire or retain an Adviser.

Additional information about CCCA is also available on the SEC's website at www.adviserinfo.sec.gov.

January 11, 2021

Item 2 Material Changes

We may further provide other ongoing disclosure information about material changes as necessary. We will also provide you with a new Brochure as necessary based on changes or new information, at any time, without charge.

Since the firm's last brochure of February 26, 2020, the firm has no material changes.

Currently, our Brochure may be requested by contacting Gregory C. Fenton, CFP at (508) 888-9300 or by email (greg@cambridgecape.com). You may also request, free of charge, our Brochure via our web site at: http://www.cambridgecape.com.

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Item 4 Advisory Business

Cambridge Cape Cod Advisors ("CCCA") is a fee-only holistic financial planning firm that specializes in providing holistic financial planning and investment advisory services to retired and upper-income individuals and families. CCCA is owned and operated by Gregory C. Fenton, CFP, who established CCCA in 1996. CCCA offers a wide range of financial services. Specifically, by providing services to meet not only your investment needs, but also your tax, risk management, retirement planning, and business development needs. CCCA does not sell insurance or investment products, nor does it accept commissions as a result of any product recommendations. CCCA does not pay referral or finder's fees, nor does it accept such fees from other firms.

CCCA accepts non-discretionary authority to execute investment recommendations. Non-discretionary authority requires CCCA to obtain Client's prior approval of each specific transaction prior to executing investment recommendations. CCCA will act in accordance with a Client's investment objectives and suitability.

CCCA and Client will enter into an agreement which details the scope of the relationship and responsibilities of both CCCA and Client. Advice and services provided under the agreement are tailored to the stated objectives of the Client(s).

CCCA provides the following three types of services:

1. **Open Retainer:** An Open Retainer provides holistic/comprehensive financial planning for a fixed fee over the course of one year. You will have four to six scheduled meetings during the Initial Year (see below), depending on your individual situation, and generally two to four scheduled meetings during Renewal Years (see below). In addition to scheduled meetings, additional face-to-face, e-mail and/or phone consultations are included at no additional charge. Services provided may include, but are not limited to: investment management, tax preparation, tax planning, insurance review, inventory of assets, analysis of financial goals, portfolio analysis, development of an asset allocation strategy, no-load mutual fund recommendations, retirement planning and estate plan reviews.

Initial Year of Open Retainer - Scheduled meeting topics are listed below. CCCA will schedule meetings to cover those topics relevant to you.

- Tax preparation
- Tax planning
- Inventory of client assets
- Portfolio analysis
- Develop asset allocation strategies
- Recommend investments
- Insurance analysis
- Analysis of employee benefits
- Budgeting and cash flow
- Record-keeping
- Retirement planning
- Goal setting
- Estate planning review
- Small business planning
- Education planning

Renewal Years of Open Retainer - Typical scheduled meetings:

- Tax planning & Tax preparation
- Investment review/update
- Goal setting/review
- Rebalancing of assets
- Financial planning and/or any financial services as requested or needed by client.

2. **Project Retainer:** It is possible that you may have limited concerns in which an Open Retainer relationship is not practical. Thus, Project Retainer services are narrower in scope as compared to the Open Retainer and usually focus on one or more of the following areas: goal setting, asset/liability analysis, tax planning, cash flow management, investment review, retirement planning, risk management, estate planning and record keeping. The service includes various client consultations as well as written and/or oral recommendations resulting from such consultations. The Project Retainer does not constitute a comprehensive financial planning engagement. As such, follow-up advice and/or implementation assistance is not provided following the completion of the Project Retainer agreement.

Additionally, tax return preparation is not automatically included with the Project Retainer, but may be purchased as a separate service, at your request, for an additional fee.

If you wish to upgrade to the Open Retainer option, you may receive credit toward Open Retainer fees for all amounts paid under Project Retainer agreements for the past six months.

3. **Financial Review:** A Financial Review consists of a two-hour review of up to three financial planning topics selected in advance by you. No follow-up services are provided with the Financial Review.

Termination of Services:
You may terminate an engagement within five days of signing the services agreement, upon written notice, without penalty or fee. After five days, you may terminate your agreement, without penalty, at any time upon 30 days written notice. If you have made an advanced payment, the unearned portion of the payment will be refunded.

You are under no obligation to implement any advice given to you.

Wrap Fee Programs:
CCCA does not participate or sponsor any wrap-fee programs.

Assets Under Management:
As of December 31, 2020, CCCA had $152,515,726 in non-discretionary assets under management.

Item 5 Fees and Compensation

CCCA is a fee-only financial advisory firm and does not sell investment or insurance products. All fees are non-negotiable and are paid, as described below, directly by you.

Open Retainer

Initial Year of Open Retainer: $3,000 - $20,000
Renewal Years of Open Retainer: $3,000 - $20,000

Fees are calculated annually and payable quarterly, in advance. Fees are based on your total income, assets, and the overall complexity of your financial situation. CCCA deducts its fee directly from the client's account held at the independent custodian.

Other fees
In addition to CCCA's fee, clients may incur certain other fees and charges to implement CCCA's recommendations. Additional charges and fees will be imposed by custodians, brokers, third party investment and other third parties, related to the securities held in an account, such as fees charged by managers, custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes. Mutual funds and exchange traded funds also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of, and in addition to, CCCA's fee.

Add-ons, credits, and miscellaneous adjustments: A charge of $200 is assessed for each amended tax return prepared, if applicable. A charge of up to $200 per return is assessed for additional tax returns prepared for dependents of the Client. Credits and miscellaneous adjustments may be applied if the client has an adequate estate plan (will or trust) in place, or for other reasons, as appropriate.

Project Retainer

Services under the Project Retainer are provided on a flat-fee basis. Fees are due at the beginning of the engagement. At CCCA's discretion, fees may be paid with one-half due at the beginning of the engagement and the remainder upon completion. In no instance will CCCA collect $1,200 or more six mos. or more in advance of services.

Financial Review

The cost for a Financial Review is a flat fee of $900, due at the beginning of the Review appointment.

Item 6 Performance-Based Fees and Side-By-Side Management

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

Item 7 Types of Clients

CCCA provides holistic financial planning and investment advisory services primarily to retired and upper-income individuals and families. We strive to work with people from all different walks of life. As such, we maintain no minimum net-worth or asset requirements. As discussed above, your chosen relationship agreement and fee will be based upon your individual circumstances.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

In determining investment recommendations, CCCA will utilize public information obtained through Morningstar as well as other public research. Moreover, CCCA approaches investment portfolio analysis and implementation based on internal factors such as your tax situation, overall risk tolerance, current financial situation, and your personal goals and aspirations. After identifying these items, your portfolio will be structured around your individual needs, while minimizing negative effects of external factors, such as interest rates, market performance, and the economy as a whole.

In general, CCCA recommends no-load mutual funds (i.e., mutual funds that have no sales fees), U.S. government securities, money market accounts, certificates of deposit, and individual bonds (corporate, agency and municipal). However, in the course of providing investment advice, CCCA may address issues related to other types of assets that you may already own. Any other products that may be deemed appropriate for you will be discussed, based upon your goals, needs and objectives.

Risks Associated with Securities:
Investing in securities involves risk of loss. The inherent risks associated with any investment recommended by CCCA will be thoroughly reviewed and discussed with your goals, needs, and objectives at the forefront. This will help ensure you fully understand your investments and that you are properly prepared to bear any associated risks.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values increase over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Liquidity Risk: The inability to readily buy or sell an investment for a price close to the true underlying value of the asset due to a lack of buyers or sellers. While certain types of fixed income are generally liquid (i.e., bonds), there are risks which may occur such as when an issue trading on any given period does not readily support buys and sells at an efficient price. Conversely, when trading volume is high, there is also a risk of not being able to purchase a particular issue at the desired price.

Credit Risk: The potential risk that an issuer would be unable to pay scheduled interest or repay principal at maturity, sometimes referred to as "default risk." Credit risk may also occur when an issuer's ability to make payments of principal and interest when due is interrupted. This may result in a negative impact on all forms of debt instruments, as well as funds or ETF/ETN share values that hold these issues. Bondholders are creditors of an issuer and have priority to assets before equity holders (i.e., stockholders) when receiving a payout from liquidation or restructuring. When defaults occur due to bankruptcy, the type of bond held will determine seniority of payment.

Index Investing: ETFs and indexed mutual funds have the potential to be affected by "active risk" or "tracking error risk," which might be defined as a deviation from the stated benchmark. Since the core portfolio may attempt to closely replicate a stated benchmark, the source of the tracking error or deviation may come from a satellite portfolio or position, or from a "sample" or "optimized" index fund or ETF that may not as closely align with the stated benchmark. In these instances, the firm may choose to reduce the weighting of a satellite holding, utilize very active satellites, or use a “replicate index” position as part of its core holdings to minimize the effects of the tracking error in relation to the overall portfolio.

Investment Companies Risk. When a client invests in open end mutual funds or ETFs, the client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the client will incur higher expenses, many of which may be duplicative. In addition, the client’s overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF’s shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF’s shares may be halted if the listing exchange’s officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide “circuit breakers” (which are tied to large decreases in stock prices) halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which clients invest

Item 9 Disciplinary Information

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

Item 10 Other Financial Industry Activities and Affiliations

Financial Industry Activities
CCCA serves its clients only as a registered investment advisor. It is not registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

Affiliations
CCCA is not affiliated with a related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

CCCA is a member of the Alliance of Comprehensive Planners (ACP). This non-profit organization provides training and support through an alliance of fee-only comprehensive financial advisors. As a member of the ACP, CCCA has the right to use proprietary products and systems designed by the ACP. The Alliance of Comprehensive Planners provides ongoing training in the form of conferences and services produced by collaborative efforts of the fee-only financial advisors.

CCCA is a member of the National Association of Personal Financial Advisors (NAPFA).

Item 11 Code of Ethics, Participation or Interest in *Client* Transactions and Personal Trading

CCCA seeks to avoid material conflicts of interest. Accordingly, neither CCCA nor its investment adviser representatives nor its team members receive any third party direct monetary compensation (i.e., commissions, 12b-1 fees, or other fees) from brokerage firms (custodians) or mutual fund companies.

Although CCCA believes that its business methodologies, ethics rules, and adopted policies are appropriate to eliminate, or at least minimize, potential material conflicts of interest, and to appropriately manage any material conflicts of interest that may remain, clients should be aware that no set of rules can possibly anticipate or relieve all potential material conflicts of interest.

Our Code of Ethics
CCCA has adopted a Code of Ethics, to which all investment advisor representatives and employees are bound to adhere. Our Code of Ethics states:

CCCA and its investment advisor representatives and employees shall always:

- As a fiduciary, act in the best interests of each and every client;
- Act with integrity and dignity when dealing with clients, prospects, and others;
- Strive to maintain and continually enhance our high degree of professional education regarding all aspects of personal financial planning; and
- Seek at all times to preserve our firm's independence and to maintain our complete objectivity with respect to our advisory services and each recommendation made to our clients.

Participation or Interest in Client Transactions and Personal Trading
CCCA does not currently participate in securities in which it has a material financial interest. CCCA and its related persons, as a matter of policy, do not recommend to clients, or buy or sell for client accounts, securities in which the firm or its related persons has a material financial interest. Individuals associated with our firm may buy or sell securities for their personal accounts identical or different than those recommended to clients. However no person employed by the firm shall prefer his or her own interest to that of an advisory client nor make personal investment decisions based on investment decisions of advisory clients.

To supervise compliance with the Code of Ethics, our firm requires that anyone associated with this advisory practice and who possesses access to advisory recommendations (before or at the time they are entered into) ("access persons") to provide annual securities holding reports and quarterly transaction reports to CCCA's owner or his designee. We also require access persons to receive advance approval from CCCA's owner or his designee prior to investing in any initial public offerings or private placements, and with regard to trading of certain individual securities.

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Item 12 Brokerage Practices

CCCA may recommend a broker-dealer. You are not obligated to effect transactions through any broker-dealer recommended by CCCA. In recommending broker-dealers, CCCA will generally seek "best execution." In recommending a broker-dealer, CCCA will comply with its fiduciary duty and the Securities Exchange Act of 1934 to obtain best execution. Factors considered include, but are not limited to, the broker-dealer's facilities, costs, reliability and financial responsibility, the ability of the broker-dealer to effect transactions, and the research and related brokerage services provided to you and/or CCCA.

Recommending a broker dealer can create a conflict of interest. Some additional services and non-direct monetary or other forms of compensation may be offered and provided to CCCA as a result of its relationships with custodian(s) and/or providers of mutual fund products. For example, CCCA's investment advisors and employees may be invited to attend educational conferences and/or entertainment events sponsored by such brokerage firms or custodians or mutual fund companies at a reduced or no charge. CCCA believes that the services and benefits provided to the firm by brokerage firms (custodians) and mutual fund providers do not materially affect the investment management recommendations made to clients. Accordingly, CCCA has established the following restrictions in order to ensure its fiduciary responsibilities:

1. A Director, officer, associated person, or employee of CCCA shall not buy or sell securities for his personal portfolio where his decision is substantially derived, in whole or in part, by reason of his employment unless the information is also available to the investing public or reasonable inquiry. No person of CCCA shall prefer his or her own interest over that of an advisory client;

2. CCCA maintains a list of all securities holdings for itself and anyone associated with its advisory practice with access to advisory recommendations. These holdings are reviewed on a regular basis by an appropriate officer of CCCA;

3. CCCA emphasizes your unrestricted right to decline to implement any advice rendered.

4. CCCA emphasizes your unrestricted right to select and choose anybroker or dealer, and/or insurance company you wish; and

5. CCCA requires that all associated individuals act in accordance with all applicable federal and stateregulations governing registered investment advisory practices.

Item 13 Review of Accounts

When a client portfolio is established, CCCA monitors the securities in the portfolio on an on- going basis. Gregory C. Fenton, CFP, Principal, is responsible for reviewing and reassessing financial recommendations made to you. Triggering factors include significant changes in your financial condition, changes in the fundamentals of the companies or entities issuing securities, price fluctuations and significant economic or industry developments.

CCCA does not provide written reports to clients. If you maintain any brokerage account(s), you will receive monthly and/or quarterly statements from your custodian pertaining to your account(s).

Item 14 *Client* Referrals and Other Compensation

CCCA is a fee-only financial planning firm and does not sell insurance or investment products, nor does it accept commissions as a result of any product recommendations. CCCA does not pay referral or finder's fees, nor doesit accept such fees from other firms.

Item 15 Custody

Except as to the authority to deduct its fee from clients' accounts, CCCA does not maintain custody over a client's cash or securities. Clients funds and securities are held at independent qualified custodians. Clients open their own accounts so that their funds and securities are placed in a separate account for each client under the client's name. You will receive, no less than quarterly, account statements from the broker dealer, bank or other qualified custodian that holds and maintains your investment assets.

Item 16 Investment Discretion

CCCA will execute the sale and/or purchase of investments where authorized to do so by you on a non-discretionary basis. Non-discretionary refers to the requirement to obtain a client's approval, prior to initiating any investment actions in their account.

Item 17 Voting *Client* Securities

As a matter of firm policy and practice, CCCA does not have any authority to and does not vote proxies on behalf of advisory clients. Clients retain the responsibility for receiving and voting proxies for any and all securities maintained in client portfolios. CCCA may provide advice to clients regarding the clients' voting of proxies upon client request.

Item 18 Financial Information

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about CCCA's financial condition. CCCA does not require payment of more than $1,200 6 mos. or more in advance. CCCA has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.