

Gimbal Financial, LLC

Relationship Summary (ADV Part 3 - Form CRS)

Item 1 – Introduction

Gimbal Financial, LLC (“we” or “us”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory firms differ in services and how they charge fees. It is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, (Ctrl click to access) which also provides educational materials about broker-dealers, investment advisers, and investing.

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

We offer the following advisory services to retail investors: These services include a wrap program, a variable annuity management program, and investment advice to brokerage customers through a consulting relationship. We provide services after we work with you to understand your financial situation, goals, objectives, and risk tolerance. Within the wrap program, we primarily use individual equities and exchange traded funds, but we may use other investment types. Within the variable annuity management program, we manage variable annuity subaccounts and review your account on a periodic basis, but at least annually. For a description of these services, please refer to **Form ADV Wrap Brochure, Items 4 and 5, and Form ADV Part 2A, Items 4 and 7. You can access all parts of Form ADV through <https://adviserinfo.sec.gov>** (Ctrl click to access) **Select “Firm” and type Gimbal Financial, LLC.**

Monitoring - We monitor investments on an ongoing basis, and we review your account at least quarterly. We will review your account more frequently upon request or when market conditions warrant. If providing advice through a consulting relationship, we do not provide monitoring; we review your investments on a periodic basis but at least annually.

Investment Authority - We manage wrap program and variable annuity accounts on a discretionary basis, but we will also do so on a non-discretionary basis for consulting services for pension and profit-sharing accounts. With discretionary, we will buy/sell securities or reallocate your account when we determine it is necessary. This means that we do not consult with you prior to trading. In pension and profit-sharing accounts, the trustees make the decisions. You provide us with trading authority in our advisory agreement, and it remains in place until one of us terminates our agreement.

Limited Investment Offerings – Although not all are part of our typical investment recommendation platform for your account(s), we offer advice on over-the-counter equity securities, corporate debt, municipal securities, mutual funds, US government securities, money market funds, and closed-end funds.

Account Minimums and Other Requirements - We do not impose a minimum account size. After mutual agreement, we make our best efforts to accommodate the concerns and preferences of our clients within our investment management process. As fiduciaries, we put your goals and objectives ahead of our own.

Key Questions to Ask Your Financial Professional

- **Given my financial situation, should I choose a financial 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 3A – What fees will I pay?

We charge an asset-based advisory fee that is a percentage of your account, including cash holdings. The amount of the fee is negotiable, and we charge the fees monthly in arrears. We have an incentive to increase the value of your account over time, which will increase our fees over time. Within the wrap account(s), you will not pay transaction charges, we will pay transaction charges in certain situations, as well as an asset-based fee to the custodian. This creates a conflict of interest and financial incentive for us to avoid transactions in your account or to place trades less frequently. We will also consider these transaction charges when we consider the level of your advisory fee. If applicable to your account, you will also incur charges imposed by the custodian or another third-party, including but not limited to custodian fees; retirement account maintenance fees; fees related to mutual funds and exchange-traded funds; and other transactional fees and product-level fees. We do not share in those fees.

You will pay fees and costs whether you make or lose money on your investments, and whether or not there are transactions in your account. Fees and costs will reduce any amount of money you make on your investments over time.

On occasion, we will charge a negotiated flat fee for special projects. Please make sure you understand what fees and costs you are paying. Refer to **Form ADV Part 2A, Item 5** for specific information pertaining to fees: <https://adviserinfo.sec.gov> (Ctrl click to access). Select “Firm” and type Gimbal Financial, LLC.

Key Questions 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?

Item 3B - 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 function as your investment adviser, we must 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 interest. 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: We may, personally, invest in the same securities as you, our client. Our other clients may or may not hold the same securities as you. There may be a conflict regarding rollovers if you are a participant in an employer-sponsored retirement plan or IRA and are considering a roll out of assets from the retirement plan or IRA. A conflict exists because we will only be compensated if you rollover the proceeds into an account that we manage. Therefore, we have a financial incentive to recommend one option over another. Gimbal maintains an education-only policy with respect to rollovers. Gimbal will not make a recommendation; you are solely responsible for the rollover decision. For additional information on conflicts of interest, refer to **ADV Form Part 2, Item 10 – Other Financial Industry Activities and Affiliations**.

Key Questions to Ask Your Financial Professional

- How might your conflicts of interest affect me, and how will you address them?
- Can you purchase, sell, or hold the same securities that your clients hold in their investment accounts?

Item 3C - How do your financial professionals make money?

Our revenue is from the advisory fees we collect. Our professionals are paid a percentage of the advisory fees we collect for the accounts they service. The professionals are also eligible for a discretionary bonus based on the profitability of our firm. We may receive items as gifts valued at less than \$300 annually, an occasional dinner or ticket to a sporting event, or reimbursement in connection with educational meetings or marketing or advertising initiatives. Product sponsors may also pay for education or training events that may be attended by Gimbal’s employees and advisory representatives. However, gifts and reimbursement may not be tied to the sales of any products.

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

No, our firm and our financial professionals currently do not have any legal or disciplinary history to disclose. Visit <https://www.investor.gov/CRS> for a free and simple research tool.

Key Question to Ask Your Financial Professional

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

Item 5 – What additional information might I find useful?

You can request a copy of this relationship summary (Part 3, Form CRS), and Form ADV Parts 2A and 2B, by calling 317-578-1600 or emailing us at smitchell@gimbalfinancial.com. These documents are also located on our website: <https://www.gimbalfinancial.com>.

Key Questions 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?