

## Introduction

Gimbal Financial (referred to as “we” or “us”) is registered with the Securities and Exchange Commission (“SEC”) as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](#), which also provides educational materials about broker-dealers, investment advisers, and investing.

### What investment services and advice can you provide me?

We offer investment 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. 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. Within the variable annuity management program, we manage variable annuity subaccounts and review your account on a periodic basis, but at least annually. When providing advice through a consulting relationship, we do not provide ongoing monitoring; we review your investments on a periodic basis, but at least annually. We primarily manage wrap program and variable annuity accounts on a discretionary basis, but we will also do so on a non-discretionary basis. If you select discretionary, we will buy/sell securities in your account when we determine it is necessary. This means that we do not consult with you prior to trading. If you select non-discretionary, you make the ultimate decision regarding the purchase or sale of investments. You provide us with trading authority in our advisory agreement and it remains in place until one of us terminates our agreement. We do not have any account minimums to establish an account.

*Additional information about our investment advisory services is available in our [Form ADV Appendix 1 Wrap Program Brochure](#) (see Items 4 and 5) and in our [Form ADV Part 2A Firm Brochure](#) (see items 4 and 7). If you are viewing a paper version of this form, please visit [gimbalfinancial.com/CRS](#) for hyperlinks to these documents.*

### ➤ QUESTIONS 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 licenses, education and other qualifications? What do these qualifications mean?

### 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. You pay us this fee even if there are no transactions in your account. We have an incentive to increase the value of your account over time which will increase our fees over time. Although 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.

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.

*Additional information about fees and expenses is available in our [Form ADV Appendix 1 Wrap Program Brochure](#) (see Item 4) or our [Form ADV Part 2A Firm Brochure](#) (see Item 5). If you are viewing a paper version of this form, please visit [gimbalfinancial.com/CRS](#) for hyperlinks to these documents.*

➤ **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?

**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.

There is a conflict of interest 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 of interest 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.

Additional information about our conflicts of interest is available in our [Form ADV Appendix 1 Wrap Program Brochure](#) or [Form ADV Part 2A Firm Brochure](#). If you are viewing a paper version of this form, please visit [gimbalfinancial.com/CRS](#) for hyperlinks to these documents.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

- How might your conflicts of interest affect me, and how will you address them?

**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 that they service. The professionals are also eligible for a discretionary bonus based on the profitability of our firm. Our professionals may also receive non-cash compensation from product sponsors such as: gifts valued at less than \$100 annually, an occasional dinner or ticket to a sporting event, or reimbursement for educational meetings or marketing or advertising initiatives.

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

No. You may visit [Investor.gov/CRS](#) for a free and simple search tool to research us and our financial professionals.

➤ **QUESTIONS TO ASK YOUR FINANCIAL PROFESSIONAL:**

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

**Additional information**

You can find additional information about our investment advisory services on the SEC's website at [www.adviserinfo.sec.gov](#) by searching our CRD # 159003. You may also contact our firm at (317)-578-1600.

➤ **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?