

FreeGulliver, L.L.C.

d/b/a: FreeGulliver

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Introduction	FreeGulliver is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ, and it is important for you, our client, to understand the differences. Additionally, 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. This document is a summary of the services and fees we offer to “retail” investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.								
What investment services and advice can you provide me?	<p>We offer the following investment advisory services to retail investors:</p> <table border="0"><tr><td>Portfolio Management</td><td>Selection of Other Adviser</td></tr><tr><td>Financial Planning and Consulting</td><td>Pension Consulting Services</td></tr><tr><td>Asset Allocation Services</td><td>Educational Workshops</td></tr><tr><td>Family Office and Wealth Management Services</td><td></td></tr></table> <p>Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A by clicking this link https://adviserinfo.sec.gov/firm/brochure/117040. Item 4, 7, 8, 13 and 16.</p> <p>Account Monitoring: As part of our standard service we will monitor your investments no less frequently than quarterly.</p> <p>Investment Authority: We manage investment accounts on a <i>discretionary</i> basis whereby we decide which investments to buy or sell for your account and we have discretion to select or replace third-party managers to manage your accounts. You may limit our discretionary authority (for example, limiting the types of securities that can be purchased or sold for your account) by providing our firm with a written request. We also offer <i>non-discretionary</i> investment management services whereby we will provide advice, but you will ultimately decide which investments to buy and sell. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.</p> <p>Investment Offerings: We provide advice on various types of investments. Our services are not limited to a specific type of investment or product.</p> <p>Account Minimums and Requirements: In general, we do not require a minimum dollar amount to open and maintain an advisory account. However, portfolio management clients with assets less than \$1,000,000, may be charged an additional flat fee or a higher percentage of the market value of your assets under our management.</p> <p><i>Key Questions to Ask Your Financial Professional</i></p> <ul style="list-style-type: none">• 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?	Portfolio Management	Selection of Other Adviser	Financial Planning and Consulting	Pension Consulting Services	Asset Allocation Services	Educational Workshops	Family Office and Wealth Management Services	
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What fees will I pay?	<p>The following summarizes the principal types of fees and costs associated with engaging our firm for investment advisory services. For detailed information, refer to our Form ADV Part 2A, Items 5 and 6, by clicking this link https://adviserinfo.sec.gov/firm/brochure/117040.</p> <ul style="list-style-type: none">• Asset Based Fees - Payable quarterly in arrears. Since the fees we receive are based on the value of your account, we have an incentive to encourage you to increase the assets in your account which creates a conflict of interest;• Hourly Fees - Half of the estimated fee is due in advance with the remaining balance payable upon completion of the agreed upon services; or billable as invoiced.• Fixed Fees - Depending on the service selected, fees are payable monthly or quarterly in advance; half of the fee is due in advance with the remainder billable as invoiced.• Commissions - We receive compensation in the form of commissions from the sale of insurance products since our firm is also a licensed insurance agency. This presents a conflict of interest since we have a financial incentive to sell you insurance products.• Selection of Other Advisers – You will pay additional advisory fees charged by third party money managers, which are separate and apart from our fees;								

<p>What fees will I pay? (cont.)</p>	<ul style="list-style-type: none"> • Performance-based Fees - Payable as disclosed in each Private Fund's offering documents. Performance-based fees create an incentive for our firm to make investments that are riskier or more speculative than would be the case absent a performance fee arrangement. Since we manage both accounts that charge a performance-based fee and accounts that are charged another type of fee, we have an incentive to favor accounts for which we receive a performance-based fee; • Clients may also pay additional fees and/or expenses. Example of the most common fees and costs applicable to our clients are: <ul style="list-style-type: none"> • Custodian and Account maintenance fees; Fees related to mutual funds and exchange-traded funds; Transaction charges when purchasing or selling securities; and • Other product-level fees associated with your investments. <p><i>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.</i></p> <p><i>Key Questions to Ask Your Financial Professional</i></p> <ul style="list-style-type: none"> • 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?
<p>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?</p>	<p><i>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.</i></p> <ul style="list-style-type: none"> • <i>Private Fund Affiliation and Proprietary Products:</i> We are affiliated with numerous private funds (private pooled investment vehicles), as the general partner, manager, investment advisor or administrator, in which you may be solicited to invest. The compensation paid to our Company from private funds creates a conflict of interest. We have an incentive to recommend the funds based on this compensation and certain employees' direct or indirect interest in the investment, rather than based solely on your specific needs. • <i>Third-Party Payments:</i> Some of our investment advisor representatives are independent licensed insurance agents. These persons earn commission-based compensation for selling insurance products. We are also affiliated with Friedler Group, LLC, a licensed insurance agency. Insurance commissions are separate and in addition to our advisory fees. This practice presents a conflict of interest because they have an incentive to recommend insurance products for the purpose of earning commissions rather than solely based on your needs. <p>Refer to our Form ADV Part 2A, Items 5, 10, 12 and 14, by clicking this link https://adviserinfo.sec.gov/firm/brochure/117040 to help you understand what conflicts exist.</p> <p><i>Key Questions to Ask Your Financial Professional</i></p> <ul style="list-style-type: none"> • How might your conflicts of interest affect me, and how will you address them?
<p>How do your financial professionals make money?</p>	<p>Our financial professionals receive a salary that is based on factors such as: the amount of client assets they service, the revenue the firm earns from the person's services or recommendations, and the complexity required to meet a client's needs. They also receive commissions for insurance products sold (i.e. differential compensation).</p>
<p>Do you or your financial professionals have legal or disciplinary history?</p>	<p>Yes, our firm or our financial professionals have legal or disciplinary history to disclose. These events are disclosed in the specific individual's Form U4. These documents can be found by going to Investor.gov/CRS.</p> <p><i>Key Questions to Ask Your Financial Professional</i></p> <ul style="list-style-type: none"> • As a financial professional, do you have any disciplinary history? For what type of conduct?
<p>Additional Information</p>	<p>You can find additional information about your investment advisory services and request a copy of the relationship summary at 504-899-0300 or click the link provided https://adviserinfo.sec.gov/firm/brochure/117040.</p> <p><i>Key Questions to Ask Your Financial Professional</i></p> <ul style="list-style-type: none"> • 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?