

Zoe Financial, Inc.

Firm Brochure - Form ADV Part 2A

This brochure provides information about the qualifications and business practices of Zoe Financial, Inc. If you have any questions about the contents of this brochure, please contact us at (914) 522-7547 or by email at: support@zoefin.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.

Additional information about Zoe Financial, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Zoe Financial, Inc.'s CRD number is: 285158.

205 E 42nd St
New York, NY 10017
(914) 522-7547
support@zoefin.com
<https://zoefin.com>

Registration does not imply a certain level of skill or training.

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Item 2: Material Changes

Zoe Financial, Inc. has not yet filed an annual updating amendment using the Form ADV Part 2A. Therefore there are no material changes to report.

- Zoe Financial, Inc. updated their principal office address (Front Page).

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Item 4: Advisory Business

A. Description of the Advisory Firm

Zoe Financial, Inc. (hereinafter "ZOEFIN") is a Corporation organized in the State of Delaware. The firm was formed in June 2016, and the principal owner is Andres Garcia.

B. Types of Advisory Services

Financial Planning

Financial plans and financial planning may include, but are not limited to: investment planning; life insurance; tax concerns; retirement planning; college planning; and debt/credit planning.

Services Limited to Specific Types of Investments

ZOEFIN generally limits its investment advice to mutual funds, insurance products including annuities and equities. ZOEFIN may use other securities as well to help diversify a portfolio when applicable.

C. Client Tailored Services and Client Imposed Restrictions

ZOEFIN offers the same suite of services to all of its clients. However, specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels). Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

D. Wrap Fee Programs

A wrap fee program is an investment program where the investor pays one stated fee that includes management fees, transaction costs, fund expenses, and other administrative fees. ZOEFIN does not participate in any wrap fee programs.

E. Assets Under Management

ZOEFIN has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$0	\$0	December 2016

Item 5: Fees and Compensation

A. Fee Schedule

Financial Planning Fees

Fixed Fees

The fixed rate for creating client financial plans is between \$1,000 and \$1,500. The financial planning fixed fee is an annual fee that will renew annually. This is not a "one and done fee" but an annual fee that would be up for renewal every year unless either party terminates it.

Clients may terminate the agreement without penalty, for full refund of ZOEFIN's fees, within five business days of signing the Financial Planning Agreement. Thereafter, clients may terminate the Financial Planning Agreement generally upon written notice.

B. Payment of Fees

Payment of Financial Planning Fees

Financial planning fees are paid via wire.

Fixed financial planning fees are paid 100% in advance, but never more than six months in advance.

C. Client Responsibility For Third Party Fees

Clients are responsible for the payment of all third party fees (i.e. custodian fees, brokerage fees, mutual fund fees, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by ZOEFIN. Please see Item 12 of this brochure regarding broker-dealer/custodian.

D. Prepayment of Fees

ZOEFIN collects fees in advance. Refunds for fees paid in advance will be returned within fourteen days to the client via check.

Fixed fees that are collected in advance will be refunded based on the prorated amount of work completed at the point of termination.

E. Outside Compensation For the Sale of Securities to Clients

Neither ZOEFIN nor its supervised persons accept any compensation for the sale of investment products, including asset-based sales charges or service fees from the sale of mutual funds.

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

ZOEFIN does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

Item 7: Types of Clients

ZOEFIN generally provides advisory services to the following types of clients:

- ❖ Individuals
- ❖ High-Net-Worth Individuals

There is no account minimum for any of ZOEFIN's services.

Item 8: Methods of Analysis, Investment Strategies, & Risk of Loss

A. Methods of Analysis and Investment Strategies

Methods of Analysis & Investment Strategies

ZOEFIN does not implement investment strategies. ZOEFIN will only be providing financial planning services. ZOEFIN generally limits its investment advice to mutual funds, insurance products including annuities and equities. ZOEFIN may use other securities as well to help diversify a portfolio when applicable.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

B. Material Risks Involved

Methods of Analysis & Investment Strategies

ZOEFIN does not implement investment strategies. ZOEFIN will only be providing financial planning services. ZOEFIN generally limits its investment advice to mutual

funds, insurance products including annuities and equities. ZOEFIN may use other securities as well to help diversify a portfolio when applicable.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

C. Risks of Specific Securities Utilized

Clients should be aware that there is a material risk of loss using any investment strategy. The investment types listed below are not guaranteed or insured by the FDIC or any other government agency.

Mutual Funds: Investing in mutual funds carries the risk of capital loss and thus you may lose money investing in mutual funds. All mutual funds have costs that lower investment returns. The funds can be of bond “fixed income” nature (lower risk) or stock “equity” nature.

Equity investment generally refers to buying shares of stocks in return for receiving a future payment of dividends and/or capital gains if the value of the stock increases. The value of equity securities may fluctuate in response to specific situations for each company, industry conditions and the general economic environments.

Annuities are a retirement product for those who may have the ability to pay a premium now and want to guarantee they receive certain monthly payments or a return on investment later in the future. Annuities are contracts issued by a life insurance company designed to meet requirement or other long-term goals. An annuity is not a life insurance policy. Variable annuities are designed to be long-term investments, to meet retirement and other long-range goals. Variable annuities are not suitable for meeting short-term goals because substantial taxes and insurance company charges may apply if you withdraw your money early. Variable annuities also involve investment risks, just as mutual funds do.

Past performance is not indicative of future results. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

Item 9: Disciplinary Information

A. Criminal or Civil Actions

There are no criminal or civil actions to report.

B. Administrative Proceedings

There are no administrative proceedings to report.

C. Self-regulatory Organization (SRO) Proceedings

There are no self-regulatory organization proceedings to report.

Item 10: Other Financial Industry Activities and Affiliations

A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither ZOEFIN nor its representatives are registered as, or have pending applications to become, a broker/dealer or a representative of a broker/dealer.

B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither ZOEFIN nor its representatives are registered as or have pending applications to become either a Futures Commission Merchant, Commodity Pool Operator, or Commodity Trading Advisor or an associated person of the foregoing entities.

C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Neither ZOEFIN nor its representatives have any material relationships to this advisory business that would present a possible conflict of interest.

D. Selection of Other Advisers or Managers and How This Adviser is Compensated for Those Selections

ZOEFIN may direct clients to third-party investment advisers. ZOEFIN will be compensated via a fee share from the advisers to which it directs those clients. The fees shared will not exceed any limit imposed by any regulatory agency. This creates a conflict of interest in that ZOEFIN has an incentive to direct clients to the third-party investment advisers that provide ZOEFIN with a larger fee split. ZOEFIN will always act in the best interests of the client, including when determining which third-party investment adviser to recommend to clients. ZOEFIN will verify that all recommended advisers are properly licensed, notice filed, or exempt in the states where ZOEFIN is recommending the adviser to clients.

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

A. Code of Ethics

ZOEFIN has a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. ZOEFIN's Code of Ethics is available free upon request to any client or prospective client.

B. Recommendations Involving Material Financial Interests

ZOEFIN does not recommend that clients buy or sell any security in which a related person to ZOEFIN or ZOEFIN has a material financial interest.

C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of ZOEFIN may buy or sell securities for themselves that they also recommend to clients. This may provide an opportunity for representatives of ZOEFIN to buy or sell the same securities before or after recommending the same securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest. ZOEFIN will always document any transactions that could be construed as conflicts of interest and will never engage in trading that operates to the client's disadvantage when similar securities are being bought or sold.

D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of ZOEFIN may buy or sell securities for themselves at or around the same time as clients. This may provide an opportunity for representatives of ZOEFIN to buy or sell securities before or after recommending securities to clients resulting in representatives profiting off the recommendations they provide to clients. Such transactions may create a conflict of interest; however, ZOEFIN will never engage in trading that operates to the client's disadvantage if representatives of ZOEFIN buy or sell securities at or around the same time as clients.

Item 12: Brokerage Practices

A. Factors Used to Select Custodians and/or Broker/Dealers

ZOEFIN does not trade client's accounts or recommend broker/custodians.

1. *Research and Other Soft-Dollar Benefits*

ZOEFIN does not trade client's accounts and therefore receives no research, product, or services from a broker-dealer ("soft dollar benefits").

2. *Brokerage for Client Referrals*

ZOEFIN receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

3. *Clients Directing Which Broker/Dealer/Custodian to Use*

ZOEFIN does not trade client's accounts.

B. Aggregating (Block) Trading for Multiple Client Accounts

ZOEFIN does not trade clients' accounts and therefore does not have the ability to block trade purchases across accounts.

Item 13: Review of Accounts

A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

All financial planning accounts are reviewed upon financial plan creation and plan delivery by Andres Garcia, CEO. There is only one level of review for financial planning, and that is the total review conducted to create the financial plan.

B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

With respect to financial plans, ZOEFIN's services will generally conclude upon delivery of the financial plan.

C. Content and Frequency of Regular Reports Provided to Clients

Each financial planning client will receive the financial plan upon completion.

Item 14: Client Referrals and Other Compensation

A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

ZOEFIN may enter into written arrangements with third parties to act as solicitors for ZOEFIN's investment management services. Solicitor relationships will be fully disclosed to each Client to the extent required by applicable law. ZOEFIN will ensure each solicitor is exempt, notice filed, or properly registered in all appropriate jurisdictions. ZOEFIN will receive referral fees from insurance brokers and registered investment advisors for client referrals.

B. Compensation to Non – Advisory Personnel for Client Referrals

ZOEFIN does not directly or indirectly compensate non-advisory personnel for client referrals.

Item 15: Custody

ZOEFIN does not take custody of client accounts at any time. Custody of client's accounts is held primarily at the client's custodian. Clients will receive account statements from the custodian and should carefully review those statements for accuracy.

Item 16: Investment Discretion

ZOEFIN does not have discretion over client accounts at any time.

Item 17: Voting Client Securities (Proxy Voting)

ZOEFIN will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

Item 18: Financial Information

A. Balance Sheet

ZOEFIN neither requires nor solicits prepayment of more than \$500 in fees per client, six months or more in advance, and therefore is not required to include a balance sheet with this brochure.

B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither ZOEFIN nor its management has any financial condition that is likely to reasonably impair ZOEFIN's ability to meet contractual commitments to clients.

C. Bankruptcy Petitions in Previous Ten Years

ZOEFIN has not been the subject of a bankruptcy petition in the last ten years.

Item 19: Requirements For State Registered Advisers

A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

ZOEFIN currently has only one management person: Andres Daniel Garcia. Education and business background can be found on the individual's Form ADV Part 2B brochure supplement.

B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Other business activities for each relevant individual can be found on the Form ADV Part 2B brochure supplement for each such individual.

C. Calculation of Performance-Based Fees and Degree of Risk to Clients

ZOEFIN does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

D. Material Disciplinary Disclosures for Management Persons of this Firm

There are no civil, self-regulatory organization, or arbitration proceedings to report under this section.

E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither ZOEFIN, nor its management persons, has any relationship or arrangement with issuers of securities. See Item 10.C and 11.B.