

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.

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

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Item 2: Material Changes

Zoe Financial, Inc. has made the following changes since the initial filing of this brochures:

- Zoe Financial, Inc. updated its principal office address and phone number (Front Page).
- The services offered by Zoe Financial, Inc. are now limited to referring clients to other investment adviser firms. Zoe receives compensation from those firms for the referrals. Zoe no longer offers financial planning services.

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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

Selection of other Adviser Services

ZOEFIN directs clients to third-party investment advisers to manage all or a portion of the individual's assets. Before selecting other advisers for clients, the firm will always ensure those other advisers are properly licensed or registered as an investment adviser. The firm will not review the ongoing performance of the third-party adviser as a portion of the individual's portfolio.

C. Client Tailored Services and Client Imposed Restrictions

ZOEFIN's services are limited to making referrals to other investment advisers. Specific client investment strategies and their implementation are dependent upon the client's current situation (income, tax levels, and risk tolerance levels) and will be determined by the third-party adviser.

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 does not manage assets.

Item 5: Fees and Compensation

A. Fee Schedule

Selection of Other Advisers Fees

ZOEFIN may direct clients to third-party investment advisers. The third-party adviser will pay ZOEFIN a share of the fee it charges to its clients. The fees shared are negotiable

and will not exceed any limit imposed by any regulatory agency. The notice of termination requirement and payment of fees for third-party investment advisers will depend on the specific third-party adviser selected.

B. Payment of Fees

Payment of Selection of Other Advisers Fees

The timing, frequency, and method of paying fees for selection of third-party managers will depend on the specific third-party adviser selected and will be disclosed to the client prior to entering into a relationship with the third-party advisor.

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

Depending on the third-party adviser selected, ZOEFIN may receive fees in advance. Refunds for fees paid in advance will be returned in accordance with the agreement between the third-party adviser and its client.

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.

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

Selection of Other Advisers: ZOEFIN's process for selecting third-party advisers cannot ensure that those advisers will perform as desired and the firm will have no control over the day-to-day operations of any of its selected advisers. ZOEFIN would not necessarily be aware of certain activities at the underlying third-party adviser level, including without limitation an adviser engaging in unreported risks, investment "style drift" or even regulatory breaches or fraud.

C. Risks of Specific Securities Utilized

ZOEFIN does not recommend specific securities to clients; however, clients should be aware that there is a material risk of loss using any investment strategy.

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 generally covers Insider Trading, 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

Neither ZOEFIN nor any related person of ZOEFIN recommends or buys or sells securities for client accounts.

C. Investing Personal Money in the Same Securities as Clients

Neither ZOEFIN nor any related person of ZOEFIN recommends or buys or sells securities for client accounts .

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

Neither ZOEFIN nor any related person of ZOEFIN recommends or buys or sells securities for client accounts

Item 12: Brokerage Practices

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

ZOEFIN does not trade client's accounts or recommend broker-dealers/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

ZOEFIN does not maintain or review client accounts.

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

ZOEFIN does not maintain or review client accounts.

C. Content and Frequency of Regular Reports Provided to Clients

ZOEFIN does not maintain or review client accounts.

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 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 manage client accounts and therefore 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.