

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

The material changes in this brochure from the last annual updating amendment of Zoe Financial, Inc. on 03/14/2018 are described below. Material changes relate to Zoe Financial, Inc.'s policies, practices or conflicts of interests only.

- The firm has updated this brochure throughout to clarify that it does not have investment advisory clients and does not provides investment advisory services other than referring individuals to other registered investment advisers.
- 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 individuals to other investment adviser firms. Zoe receives compensation from those firms for the referrals. Zoe no longer offers financial planning services.
- Zoe Financial, Inc. no longer receives referral fees from insurance brokers. (Item 14)

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Item 4: Advisory Business

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.

Adviser Referral Services

ZOEFIN refers individuals to other registered investment advisers. The individual determines whether to enter into an advisory relationship with the other adviser. We will always determine whether those other advisers are properly registered as an investment adviser. We do not review the ongoing performance of the third-party adviser, do not effect changes for the individual's account, and do not provide investment recommendations to the individual. Individuals will receive a copy of the third-party adviser's Form ADV Part 2 and should be aware that they can obtain investment advisory services directly from the other advisers.

Our services are limited to making referrals to other registered investment advisers. The other adviser will determine and implement specific investment strategies for the referred individual.

Item 5: Fees and Compensation

Adviser Referral Fees

If the referred individual enters into an advisory relationship with the other investment adviser, that adviser will pay ZOEFIN a share of the fee it charges to its client. ZOEFIN does not receive any fees directly from the referred individual.

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

As ZOEFIN does not directly charge fees, this item does not apply to our business.

Item 7: Types of Clients

ZOEFIN does not provide investment advisory services to any person other than referring individuals to other investment advisers.

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

ZOEFIN's process for referring individuals to other investment advisers cannot ensure that those advisers will perform as desired and we will have no control over the day-to-day operations of any of the other advisers. ZOEFIN would not necessarily be aware of certain

activities at the other adviser, including without limitation an adviser engaging in unreported risks, investment “style drift” or even regulatory breaches or fraud.

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

ZOEFIN has no criminal or civil actions or administrative or 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 supervised persons 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 supervised persons 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 supervised persons have any financial affiliations material to its business that would present a possible conflict of interest.

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

ZOEFIN refers individuals to other registered investment advisers. ZOEFIN will be compensated via a fee share from the other advisers when an individual elects to enter into an advisory relationship with that adviser. This creates a conflict of interest in that ZOEFIN has an incentive to refer individuals to investment advisers that provide ZOEFIN with a larger fee share. ZOEFIN will always act in the best interests of the individual, including when determining which third-party investment advisers to refer to an individual. ZOEFIN will verify that all third-party advisers are properly

registered, notice filed, or exempt from registration in the states where the referred individual is located.

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

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.

Item 12: Brokerage Practices

This item is not applicable to the business activities of ZOEFIN.

Item 13: Review of Accounts

This item is not applicable to the business activities of ZOEFIN.

Item 14: Client Referrals and Other Compensation

This item is not applicable to the business activities of ZOEFIN.

Item 15: Custody

This item is not applicable to the business activities of ZOEFIN.

Item 16: Investment Discretion

This item is not applicable to the business activities of ZOEFIN.

Item 17: Voting Client Securities (Proxy Voting)

This item is not applicable to the business activities of ZOEFIN.

Item 18: Financial Information

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

Neither ZOEFIN nor its supervisor persons accept performance-based fees.

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.