

Form ADV Part 3 – Client Relationship Summary

September 2024

Item 1: Introduction

Zoe Financial Inc. is an investment adviser registered with the Securities and Exchange Commission offering investment advisor solicitor services. Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. This document gives you a summary of the types of services and fees we offer. Please visit www.investor.gov/CRS for free, simple tools to research firms and financial professionals, as well as educational materials about broker-dealers, investment advisers, and investing.

Item 2: Relationships and Services

Questions to ask us: 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?

What investment services and advice can you provide me? Our firm acts solely as a solicitor of other investment advisory firms. Therefore we do not have investment discretion, do not make specific investment recommendations, and do not manage or monitor client accounts on an ongoing basis. Our firm does not have a minimum account size. Please also see our [Form ADV Part 2A \(“Brochure”\)](#), specifically [Item 4 Advisory Business](#) & [Item 7 Types of Clients](#).

Item 3: Fees, Costs, Conflicts, and Standard of Conduct

Questions to ask us: 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? How might your conflicts of interest affect me, and how will you address them?

What fees will I pay? We do not charge you a fee; however if you enter into an advisory relationship with an investment adviser in our network, then that adviser will pay us a share of the fee it charges to you. We will provide you with a disclosure statement that details this fee sharing arrangement. The referral fee paid to us generally does not vary based on the *type* of investments you select via the third-party investment adviser, but will vary depending on the *amount* of assets you place with that investment advisory firm. Please also see [Item 4 Advisory Business](#), [Item 5 Fees and Compensation](#), [Item 6 Performance-Based Fees and Side-By-Side Management](#), [Item 7 Types of Clients](#) & [Item 8 Methods of Analysis, Investment Strategies, & Risk of Loss](#) of our [Brochure](#).

You should be aware that some investments (e.g., mutual funds) impose additional fees (e.g., transactional fees and product-level fees) that reduce the value of your investment over time. The same goes for any additional fees you pay to a custodian. Additionally, you will pay transaction fees, if applicable, when the third party investment adviser buys or sells an investment for your account. **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.** Please also see our [Brochure](#) for additional details.

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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?: *The independent advisors in our network must act in your best interest and not put their interest ahead of yours. At the same time, the way we [Zoe] make money could create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice the independent advisor provide you. Here are some examples to help you understand what this means (see heading immediately below).*

How do your financial professionals make money? We as a company receive cash compensation from the third-party investment advisory firms to which we refer you. As referenced above, if you choose an assets under management relationship fee structure with the advisor, the amount of assets in your account affects our referral fee; the more assets you have in your advisory account, the more you will pay the advisor (and therefore us) and thus we have an incentive to increase/maximize that amount in order to increase our fee. Please also see [Item 10 Other Financial Industry Activities and Affiliations](#) of our [Brochure](#) for additional details.

Item 4: Disciplinary History

Questions to ask us: As a financial professional, do you have any disciplinary history? For what type of conduct?

Do you or your financial professionals have legal or disciplinary history? No, we do not have legal and disciplinary events. Visit <https://www.investor.gov/> for a free, simple search tool to research us and our financial professionals.

Item 5: Additional Information

Questions to ask us: 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?

For additional information on our advisory services, see our [Brochure](#) available at adviserinfo.sec.gov and any individual brochure supplement your representative provides. If you have any questions, need additional up-to-date, or want another copy of this Client Relationship Summary, then please contact us at 646-847-2106.

