

<p><b>Introduction</b></p>	<p>Zoe Securities LLC (“Broker” or “we” or “our”) is a broker-dealer registered with the U.S. Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority Inc. (“FINRA”) and Securities Investor Protection Corporation (“SIPC”). Brokerage and investment advisory services and fees differ, and it is important that you understand the differences. Free and simple tools are available to research firms and financial professionals at <a href="https://investor.gov/CRS">Investor.gov/CRS</a>, which also provides educational materials about broker-dealers, investment advisers, and investing.</p>					
<p><b>What investment services and advice can you provide me?</b></p>	<p>Broker is a subsidiary of Zoe Financial, Inc. (“Zoe”), an investment adviser registered with the SEC. Zoe provides a wealth platform for third-party investment adviser firms (“Advisers”) to use and manage their individual client accounts. Broker provides introducing brokerage services to retail investors who are individual clients of Advisers and who open accounts with Broker through their relationship with one of the Advisers using Zoe’s wealth platform. Each individual client of an Adviser will become a customer of Broker (“Customer”). Each Customer will have an account that is managed by an Adviser. Broker does not make investment recommendations to its Customers, have discretionary investment authority over Customer accounts or monitor Customer investments. Broker introduces all Customer accounts to Apex Clearing Corp (“Apex”), who will hold Customer cash and securities, execute, clear and settle all Customer securities transactions, record all Customer transactions, and facilitate standard account activities such as transferring securities and/or cash out of Customer brokerage accounts and providing account statements. Broker will only effect Customer securities trades on an agency basis through Apex.</p> <p>Broker also provides Customers the ability to participate in a cash sweep program (the “Cash Sweep Program”) facilitated by Apex, whereby cash held in eligible Customer accounts is deposited at Apex’s discretion into an insured account at one or more program banks. Through the Cash Sweep Program, Customers receive interest from program banks on cash while on deposit at the program banks.</p> <p>Broker offers the ability to buy and sell U.S. listed equities, options and exchange-traded funds (“ETFs”). Broker does not offer proprietary securities products or limit our platform to products that pay us revenue sharing or other compensation.</p> <p><u>For additional information about our products and services</u>, please visit our website at <a href="https://zoefin.com/">https://zoefin.com/</a>.</p> <table border="1" data-bbox="391 1381 1498 1612"> <tr> <td><b>CONVERSATION STARTERS: Ask your financial professional:</b></td> </tr> <tr> <td><i>Given my financial situation, should I choose a brokerage service? Why or why not?</i></td> </tr> <tr> <td><i>How will you choose investments to recommend to me?</i></td> </tr> <tr> <td><i>What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</i></td> </tr> <tr> <td><i>See Response to these Conversation Starters <a href="#">here</a></i></td> </tr> </table>	<b>CONVERSATION STARTERS: Ask your financial professional:</b>	<i>Given my financial situation, should I choose a brokerage service? Why or why not?</i>	<i>How will you choose investments to recommend to me?</i>	<i>What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?</i>	<i>See Response to these Conversation Starters <a href="#">here</a></i>
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<p><b>What fees will I pay?</b></p>	<p>Broker does not charge commissions for executing Customer trades. However, you may pay certain administrative fees charged by third parties. Please see our Fee Schedule for more information.</p> <p>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 Adviser buys or sells an investment for your account. <b><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></b></p>					

<p><b>What fees will I pay?</b> <i>Continued</i></p>	<p>For <u>additional information about fees and costs</u>, please refer to Broker’s Fee Schedule on Zoe’s website. Fees may change without notice and any changes will be reflected in Broker’s Fee Schedule.</p> <p><b>CONVERSATION STARTER: Ask your financial professional:</b></p> <p><i>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?</i></p>
<p><b>What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?</b></p>	<p>We <b>do not</b> provide recommendations. The way we make money may create some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the services we provide you. Here are some examples to help you understand what this means:</p> <ul style="list-style-type: none"> <li>• We are paid when you complete a transaction, which means we have an incentive to encourage you to make larger investments and trade more frequently.</li> <li>• We receive Payment for Order Flow (PFOF) when you buy or sell securities and thus earn revenue from part or all of your transactions.</li> <li>• We may earn interest on your cash and free credit balances.</li> <li>• We earn a share in the interest proceeds from fully paid securities lending activities from Apex.</li> <li>• We are affiliated with Zoe and indirectly benefit when you or your Adviser uses the services provided by Zoe.</li> </ul> <p>For <u>additional information</u>, please visit our website at <a href="https://zoefin.com/">https://zoefin.com/</a>.</p> <p><b>CONVERSATION STARTER: Ask your financial professional:</b></p> <p><i>How might your conflicts of interest affect me, and how will you address them?</i></p>
<p><b>How do your financial professionals make money?</b></p>	<p>Broker’s financial professionals are paid salaries and discretionary bonuses based on their overall job responsibilities and performance. Our financial professionals <b>do not</b> earn any incentive-based compensation tied to the trading or investments of our customers.</p>
<p><b>Do you or your financial professionals have legal or disciplinary history?</b></p>	<p>No. Neither Broker nor our financial professionals have reportable legal or disciplinary events. Visit <a href="http://www.Investor.gov/CRS">www.Investor.gov/CRS</a> for a free and simple search tool to research Broker and our financial professionals.</p> <p><b>CONVERSATION STARTER: Ask your financial professional:</b></p> <p><i>As a financial professional, do you have any disciplinary history? For what type of conduct?</i></p>
<p><b>Additional Information</b></p>	<p>For <u>additional information about our brokerage services</u>, please visit our website at <a href="https://zoefin.com/">https://zoefin.com/</a>. If you would like additional, up-to-date information or a copy of this relationship summary, please call at 646-680-9244 or visit us at our <a href="#">Support page</a> or <a href="#">Contact Us</a>.</p> <p><b>CONVERSATION STARTER: Ask your financial professional:</b></p> <p><i>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?</i></p>