

Zoe Financial Inc. is an investment adviser registered with the U.S. Securities and Exchange Commission (SEC) 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](http://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.

What investment services and advice can you provide me?

We provide an online referral program through which we refer to users of our website, [www.zoefin.com](http://www.zoefin.com), to third-party registered investment advisers that participate in the Zoe Advisor Network. Through this program, we collect and analyze information from users through a digital form. Based on the information provided by users through the digital form, we match users with advisers that have been previously vetted and that best align with the each user's answers provided in the digital form. For additional information about our online referral program, see our [Form ADV Part 2A](#), specifically Item 4 (Advisory Business).

We also provide a turnkey asset management program, the Zoe Wealth Platform, through which we provide reporting, administrative, sub-advisory, and other support services to registered investment advisers on behalf of their underlying advisory clients. The services provided to each registered investment adviser vary in accordance with its agreement with Zoe, however, except with respect to sub-advisory services provided to clients, we do not act as an investment adviser to clients; possess knowledge of any individual client's information or investment goals and objectives; provide any client personalized investment advice; recommend any securities, transactions, or investment strategies to clients; solicit orders; make discretionary trades; or provide legal or tax advice. It is the responsibility of the registered investment advisers who utilize the Zoe Wealth Platform to gather sufficient information from clients to evaluate each client's financial situation, investment objectives, financial goals, tolerance for risk, and investment time horizon. It is also their responsibility to review their clients accounts managed through the Zoe Wealth Platform. Please review your registered investment adviser's Form ADV Part 2A to understand how and when it monitors and reviews your account. We do not impose any minimum or maximum account size or value requirements. For additional information about our turnkey asset management program, see [Appendix 1 of Form ADV Part 2A \(Wrap Brochure\)](#), specifically Item 4 (Services, Fees and Compensation).

*Ask your financial professional: 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 fees will I pay?

Under our online referral program, we do not charge you a fee; however if you enter into an advisory relationship with a registered investment adviser in the Zoe Advisor 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. In certain instances, the referral fee paid to us will vary based on the amount of assets you place with that your investment adviser. In the event we do not match you to a registered investment adviser based on your answers provided in the digital form, we provide information about non-securities products and/or services offered by third parties other than registered investment advisers, such as high-interest savings accounts provided by third-party banks. We receive compensation from these third parties for marketing their products or services or based on users purchasing their products or services. For additional information about compensation we earn under our referral program, see our [Form ADV Part 2A](#), specifically Item 5 (Fees and Compensation) and Item 16 (Client Referrals and Other Compensation).

Under our turnkey asset management program, the following fees are assessed and, based on the arrangement with your registered investment adviser, charged to you or your registered investment adviser: (1) a Sub-Advisory Fee based for client accounts for which we provide sub-advisory services; and (2) a Model Marketplace Fee for client accounts for which your registered investment adviser utilizes a model portfolio offered through the program. The Sub-Advisory Fee is set forth in our agreement with your registered investment adviser, but ranges in accordance with the Fee Schedule set forth in our [Appendix 1 of Form ADV Part 2A \(Wrap Brochure\)](#), specifically, Item 5 thereof. The Model Marketplace Fee will be based on the Zoe Financial, LLC Model Marketplace Fee Schedule (available on our website at [www.zoefin.com](http://www.zoefin.com)). Because we charge asset-based fees for these services, the more assets there are in your account, the more you will pay to us in fees. As a result, we have an incentive to encourage you and your registered investment adviser to increase the assets in your account and utilize our sub-

advisory services and model portfolios and to utilize model portfolios subject to higher fees. In addition to our fees, clients who receive services under our turnkey asset management program will incur additional fees and expenses. For example, each client's registered investment adviser will charge an advisory fee for the services it provides to clients. You should also 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. 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. For additional information about our fees and third-party fees you will incur under our turnkey asset management program, see [Appendix 1 of Form ADV Part 2A \(Wrap Brochure\)](#), specifically Item 4 (Services, Fees and Compensation).

*Ask your financial professional: 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?*

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?

**When we act as your investment adviser**, we have to act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. For example, our affiliate, Zoe Securities, LLC, is an SEC-registered broker-dealer and member of the Financial Industry Regulatory Authority. In addition, certain of our supervised persons are registered as representatives of Zoe Securities, LLC. Under our turnkey asset management program, Zoe Securities, LLC introduces all client orders to Apex Clearing Corp. for clearance, execution and settlement and will earn revenue in the form of payment for order flow, interest on fully paid securities lending activities, and may earn a portion of the interest generated on client cash balances held with Apex Clearing Corp. The receipt of revenue directly associated with client transactions raises a conflict of interest in that Zoe Securities, LLC has an incentive to encourage trading. We address this conflict by servicing managed accounts whereby Zoe Securities, LLC does not have discretion with respect to client transactions. Further, fully paid lending activities are only provided (and thus Zoe Securities, LLC only receives earned interest proceeds) when a client specifically opts into the program. For additional information about conflicts of interest associated with our services, see our [Form ADV Part 2A \(Disclosure Brochure\)](#), specifically Item 10 (Other Financial Industry Activities and Affiliations) and Item 14 (Client Referrals and Other Compensation), as well as our [Appendix 1 of Form ADV Part 2A \(Wrap Brochure\)](#), specifically Item 9 (Additional Information).

How do your financial professionals make money?

Our financial professionals are compensated through salaries, discretionary bonuses, and/or equity in our company. This gives them an incentive to maximize the revenue of the company. No compensation is based on the performance or selection of specific securities.

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.

*Ask your financial professional: As a financial professional, do you have any disciplinary history? For what type of conduct?*

#### Additional Information

For additional information on our advisory services, see our [Form ADV Part 2A \(Disclosure Brochure\)](#) and our [Appendix 1 of Form ADV Part 2A \(Wrap Brochure\)](#), available via the foregoing links or at [adviserinfo.sec.gov](http://adviserinfo.sec.gov). 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.

*Ask your financial professional: 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?*

### **Summary of Material Changes**

This December 30, 2024 amendment to our Client Relationship Summary includes the following material changes:

- We have updated the “What investment services and advice can you provide me?” section to describe our turnkey asset management program, the Zoe Wealth Platform, through which we provide reporting, administrative, sub-advisory, and other support services to registered investment advisers on behalf of their underlying advisory clients.
- We have updated the “What fees will I pay?” section to discuss fees and expenses incurred in connection with our turnkey asset management program.
- We have updated the “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?” section to discuss the services provided by our affiliate, Zoe Securities, LLC, and associated conflicts of interest.