

ZEGA Financial, LLC
May 16, 2024

FORM CRS

ZEGA Financial, LLC is registered with the Securities and Exchange Commission as an investment adviser and, as such, we provide advisory services rather than brokerage services. Brokerage and investment advisory services and fees differ and it is important for you, our client, to understand the differences. Additionally, free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers, investment advisers, and investing. This document is a summary of the services and fees we offer to "retail" investors, which are natural persons who seek or receive services primarily for personal, family, or household purposes.

What investment services and advice can you provide me?

We offer the following investment advisory services to retail investors: **Portfolio Management Services** which incorporates financial planning. We are also a **Sponsor and Manager of a Wrap Fee Program**. We also act as a sub-advisory for other investment advisory firms.

Account Monitoring: If you open an investment account with our firm, as part of our standard service we will monitor your investments on a quarterly basis, at a minimum, and ensure all investments fit your risk profile.

Investment Authority: We manage investment accounts on a **discretionary** basis whereby **we will decide** which investments to buy or sell for your account. We also offer **non-discretionary** investment management services whereby we will provide advice, but **you will ultimately decide** which investments to buy and sell for your account. You have an unrestricted right to decline to implement any advice provided by our firm on a non-discretionary basis.

Investment Offerings: We provide advice on various types of investments. Although we generally recommend investments in U.S. exchange traded options for major U.S. indexes, our services are not limited to a specific type of investment or product.

Account Minimums and Requirements: In general, we do not require a minimum dollar amount to open and maintain an advisory account; however, we have the right to terminate your account if it falls below a minimum size which, in our sole opinion, is too small to manage effectively. We impose a minimum fee for you to maintain an advisory account with us.

Detailed information regarding our services, fees and other disclosures can be found in our Form ADV Part 2A Items 4, 7, and 8 and Form ADV Part 2 Appendix 1 Brochures Items 4 and 5 by clicking this link <https://adviserinfo.sec.gov/firm/brochure/156803>.

Key Questions to 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?

The following summarizes the principal fees and costs associated with engaging our firm for investment advisory services.

- **Asset Based Fees** - Payable quarterly in arrears. Since the fees we receive are asset-based (i.e. based on the value of your account), we have an incentive to increase your account value;
- **Wrap Program Fees** - Payable quarterly in arrears, based on the value of the account at the end of the quarter. Asset-based fees associated with a wrap fee program generally include most transaction costs and fees to a broker-dealer or bank that has custody of the assets; therefore, the asset-based fee will be higher than a typical asset-based advisory fee in a non-wrap program. Since our firm pays the transaction costs associated with securities transactions in your account, we have an incentive to minimize the trading in your account. Currently, ZEGA has no clients in the WRAP program;
- Depending on the type of account you open, you may pay additional fees and/or expenses such as commissions charged by the broker-dealer/custodian. Other possible common fees and costs applicable to our clients may

include: Custodian fees; Account maintenance fees; Fees related to mutual funds and exchange-traded funds; and other product-level fees associated with your investments.

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 detailed information, refer to our Form ADV Part 2A, Items 5 and 6 and Form ADV Part 2 Appendix 1 Brochures by clicking this link <https://adviserinfo.sec.gov/firm/brochure/156803>.

Key Questions to 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. Here are some examples to help you understand what this means.

- Because many advisors revenue (including ZEGA'S) is derived from asset-based fees, advisors have an incentive to grow your account as much as possible. This could cause an advisor to take overly aggressive positions, in conflict with your interests, in an attempt to grow your account. ZEGA will review every clients' risk profile on a quarterly basis to ensure that all investments are consistent with their investment decisions. For wrap accounts, there is an incentive for us to minimize the trading since we pay for the transaction costs (i.e., commissions).

Key Questions to Ask Your Financial Professional

- **How might your conflicts of interest affect me, and how will you address them?**

Refer to our Form ADV Part 2A and Form ADV Part 2 Appendix 1 Brochures by clicking this link <https://adviserinfo.sec.gov/firm/brochure/156803> to help you understand what conflicts exist.

How do your financial professionals make money?

The financial professionals servicing your account(s) are compensated by receiving a salary that is based on the amount of client assets they service.

See above for disclosures of conflicts of interest relating to our fee structure.

Do you or your financial professionals have legal or disciplinary history?

No for our Firm. Yes for our financial professionals. For more information, visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.

Key Questions to Ask Your Financial Professional

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

You can find additional information about your investment advisory services and request a copy of the relationship summary at 800-380-9342 or click the link provided <https://adviserinfo.sec.gov/firm/brochure/156803>.

Key Questions to 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?**

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Exhibit to Form CRS

ZEGA Financial, LLC is required to update its Form CRS when information in the Form CRS becomes materially inaccurate. This Exhibit summarizes the following material changes to the firm's Form CRS, implemented on May 16, 2024:

No for our Firm. Yes for our financial professionals. For more information, visit [Investor.gov/CRS](https://investor.gov/CRS) for a free and simple search tool to research us and our financial professionals.