

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 01/29/2019 are described below. Material changes relate to Zoe Financial, Inc.'s policies, practices or conflicts of interests only.

- The firm removed its phone number from the cover page.
- The firm has updated Items 4 and 10D to clarify the firm's sole business activity of referring individuals to other investment advisers solely through an internet website.
- The firm updated Item 14 to indicate it receives referral fees from investment advisers.
- The firm has transitioned to registration with the United States Securities and Exchange Commission from its prior registration at the state level.

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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. We collect information from individual and provide referrals through our interactive website. Prior to engaging ZOEFIN, an individual user must fill out a digital form on our website, <https://zoefin.com>. The individual determines whether to enter into an advisory relationship with the other adviser. We determine whether advisers accessible through our website are 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 be provided a copy of the other adviser’s Form ADV Part 2A and should be aware that they can obtain investment advisory services directly from the other adviser selected through our website, or other advisers of the individual’s choice. 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. Users will receive a disclosure statement that details the fee sharing arrangement. 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 to persons accessing our services, 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 user of our services and a client of the other adviser, 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 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 may create a conflict of interest in that ZOEFIN would have an incentive to refer individuals to investment advisers that provide ZOEFIN with a larger fee share or pay such fee share on a schedule more favorable to ZOEFIN. ZOEFIN's algorithms are designed and intended to act in the best interests of the individual, including when determining to which investment advisers to refer to an individual. ZOEFIN verifies that third-party advisers accessible through ZOEFIN's website are 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 includes but is not limited to Prohibited Activities, Conflicts of Interest, Confidentiality, Compliance with Laws and Regulations, Reporting Violations, Training and Education, and Recordkeeping. 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

ZOEFIN's compensation is derived entirely from referrals of users of its website to other investment advisers. Such investment advisers pay a referral fee to ZOEFIN, but are prohibited from charging any part thereof to the users.

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.