

**FORM ADV PART 2A
DISCLOSURE BROCHURE**



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This brochure provides information about the qualifications and business practices of Zero Day Capital Enterprises LLC. Being registered as an investment adviser does not imply a certain level of skill or training. If you have any questions about the contents of this brochure, please contact us at 702-271-3265. 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 ZERO DAY CAPITAL ENTERPRISES
LLC (CRD #331228) IS AVAILABLE ON THE SEC'S WEBSITE AT
WWW.ADVISERINFO.SEC.GOV**

Item 2: Material Changes

Annual Update

The Material Changes section of this brochure will be updated annually or when material changes occur since the previous release of the Firm Brochure.

Material Changes since the Last Update

Since the last filing on April 5, 2024, the following changes have occurred:

- Item 4 Client assets under management have been updated.
 - The brochure has been reformatted.
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Full Brochure Available

This Firm Brochure being delivered is the complete brochure for the Firm.

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Item 4: Advisory Business

Firm Description

Zero Day Capital Enterprises LLC ("Zero Day") was founded and became registered as an investment advisor in 2024. Travis Salley is 100% owner and Chief Compliance Officer.

Types of Advisory Services

ASSET MANAGEMENT

Zero Day offers discretionary asset management services to advisory Clients. Zero Day will offer Clients ongoing asset management services through determining individual investment goals, time horizons, objectives, and risk tolerance. Investment strategies, investment selection, asset allocation, portfolio monitoring and the overall investment program will be based on the above factors. The Client will authorize Zero Day discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

When deemed appropriate for the Client, Zero Day may hire Sub-Advisors to manage all or a portion of the assets in the Client account. Zero Day has full discretion to hire and fire Sub-Advisors as they deem suitable. Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Zero Day. Sub-Advisors execute trades on behalf of Zero Day in Client accounts. Zero Day will be responsible for the overall direct relationship with the Client. Zero Day retains the authority to terminate the Sub-Advisor relationship at Zero Day's discretion.

Zero Day uses a third-party platform provided by Pontera Solutions Inc. to facilitate management of held away assets such as 401k accounts. Zero day is not affiliated with the platform in any way and receives no compensation from them for using their platform. A link will be provided to the Client allowing them to connect an account(s) to the platform. Zero Day does not have access to or ability to view the Client log-in credentials when using the platform. Once Client account(s) is connected to the platform, Zero Day will review the current account allocations. When deemed necessary, Zero Day will rebalance the account considering Client investment goals and risk tolerance, and any change in allocations will consider current economic and market trends.

FINANCIAL PLANNING

Financial planning services are available for any applicable topics that the Client would like reviewed. Typical topics reviewed may include but are not limited to: financial goals, personal financial consulting, investment analysis, retirement strategy, cash flow analysis, risk management, long-term investment and estate preservation.

If a conflict of interest exists between the interests of Zero Day and the interests of the Client, the Client is under no obligation to act upon any recommendation. Implementation of any recommendations will be at the discretion of the Client. If the Client elects to act on any of the recommendations, the Client is under no obligation to affect the transaction through Zero Day. Financial plans will be completed and delivered within sixty (60) days contingent on the timely delivery of all applicable documents from the Client.

Client Tailored Services and Client Imposed Restrictions

The goals and objectives for each Client are documented in our Client files. Investment strategies are created that reflect the stated goals and objectives. Clients may impose restrictions on investing in certain securities or types of securities. Agreements may not be assigned without written Client consent.

Wrap Fee Programs

Zero Day does not sponsor any wrap fee programs.

Client Assets under Management

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$35,208,000	\$0	12/31/2024

Item 5: Fees and Compensation

Method of Compensation and Fee Schedule**ASSET MANAGEMENT**

Zero Day charges an annual investment advisory fee based on the total assets under management of up to 2.50%.

Assets Under Management	Annual Fee
All assets	Up to 2.50%

The annual fee is negotiable. The fees are charged monthly in arrears and are based on the average daily account balance for the period for the prior month. Lower fees for comparable services may be available from other sources. Clients may terminate their account within five (5) business days of signing the Investment Advisory Agreement with no obligation and without penalty. After the initial five (5) business days, the agreement may be terminated by Zero Day with thirty (30) days written notice to Client and by the Client at any time with written notice to Zero Day. For accounts opened or closed mid-billing period, fees will be prorated based on the days services are provided during the given period. All unpaid earned fees will be due to Zero Day. Client shall be given thirty (30) days prior written notice of any increase in fees. Any increase in fees will be acknowledged in writing by both parties before any increase in said fees occurs.

Zero Day may utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Zero Day will enter into Sub-Advisor agreements with other registered investment advisor firms. When using Sub-Advisors, the Client will not pay additional fees. The Sub-Advisor fees are inclusive of the total fee disclosed by Zero Day.

FINANCIAL PLANNING

Zero Day charges a fixed fee for financial planning services between \$1,000 and \$5,000 dependent upon the complexity of the Client's specific situation. Lower fees for comparable services may be available from other sources. Fees for financial planning are billed 50% in advance with the balance due upon delivery of the plan. Prior to the planning process the Client will be provided an estimated plan fee. Services are completed and delivered within sixty (60) days contingent on the timely delivery of all applicable documents from the Client. Implementation of any recommendations will be at the discretion of the Client. Client may cancel within five (5) business days of signing Agreement with no obligation. If the Client cancels after five (5) business days, any unearned fees will be refunded to the

Client, or any unpaid earned fees will be due to Zero Day based on the percentage of the work completed by Zero Day.

Client Payment of Fees

Fees for asset management services are deducted from a designated Client account to facilitate billing. The Client must consent in advance to direct debiting of their investment account.

Fees for financial planning will be billed to the Client and paid directly to Zero Day.

Additional Client Fees Charged

Custodians may charge transaction fees and other related costs on the purchases or sales of mutual funds, equities, bonds, options and exchange-traded funds. Mutual funds, money market funds and exchange-traded funds also charge internal management fees, which are disclosed in the fund's prospectus. Zero Day does not receive any compensation from these fees. All of these fees are in addition to the management fee you pay to Zero Day. For more details on the brokerage practices, see Item 12 of this brochure.

Prepayment of Client Fees

Fees for financial planning are billed 50% in advance with the balance due upon delivery of the plan.

If the Client cancels after five (5) business days, any unearned fees will be refunded to the Client, or any unpaid earned fees will be due to Zero Day.

External Compensation for the Sale of Securities to Clients

Investment Advisor Representatives of Zero Day receive external compensation from sales of investment related products such as insurance as licensed insurance agents. This represents a conflict of interest because it gives an incentive to recommend products based on the commission received. This conflict is mitigated by disclosures, procedures and Zero Day's fiduciary obligation to place the best interest of the Client first and Clients are not required to purchase any products or services. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 6: Performance-Based Fees and Side-by-Side Management

Sharing of Capital Gains

Fees are not based on a share of the capital gains or capital appreciation of managed securities.

Item 7: Types of Clients

Description

Zero Day generally provides investment advice to individuals, high net worth individuals, trusts, estates, corporations or business entities. Client relationships vary in scope and length of service.

Account Minimums

Zero Day does not require a minimum to open an account.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis

Security analysis methods may include fundamental analysis, technical analysis, charting analysis and cyclical analysis. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Fundamental analysis concentrates on factors that determine a company's value and expected future earnings. This strategy would normally encourage equity purchases in stocks that are undervalued or priced below their perceived value. The risk assumed is that the market will fail to reach expectations of perceived value.

Technical analysis attempts to predict a future stock price or direction based on market trends. The assumption is that the market follows discernible patterns and if these patterns can be identified then a prediction can be made. The risk is that markets do not always follow patterns and relying solely on this method may not take into account new patterns that emerge over time.

Charting analysis strategy involves using and comparing various charts to predict long and short-term performance or market trends. The risk involved in using this method is that only past performance data is considered without using other methods to crosscheck data. Using charting analysis without other methods of analysis would be making the assumption that past performance will be indicative of future performance. This may not be the case.

Cyclical analysis assumes that the markets react in cyclical patterns which, once identified, can be leveraged to provide performance. The risks with this strategy are twofold: 1) the markets do not always repeat cyclical patterns; and 2) if too many investors begin to implement this strategy, then it changes the very cycles these investors are trying to exploit.

Analysis of Sub-Advisor strategies includes an examination of the experience, investment philosophies and performance of the investment managers to determine if the Sub-Advisor can invest over time with varying economic conditions. Zero Day also reviews the Sub-Advisor's underlying strategies, holdings, concentrations and leverage as part of their overall risk assessment. Investing in securities involves risk of loss that Clients should be prepared to bear. Past performance is not a guarantee of future returns.

Investment Strategy

The investment strategy for a specific Client is based upon the objectives stated by the Client during consultations. The Client may change these objectives at any time by providing written notice to Zero Day. Each Client executes a Client profile form or similar form that documents their objectives and their desired investment strategy.

Security Specific Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks and should discuss these risks with Zero Day:

- *Market Risk:* The prices of securities in which Clients invest may decline in response to certain events taking place around the world, including those directly involving the companies whose securities are owned by a fund; conditions affecting the general

economy; overall market changes; local, regional or global political, social or economic instability; and currency, interest rate and commodity price fluctuations. Investors should have a long-term perspective and be able to tolerate potentially sharp declines in market value.

- *Interest-rate Risk:* Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- *Inflation Risk:* When any type of inflation is present, a dollar today will buy more than a dollar next year, because purchasing power is eroding at the rate of inflation.
- *Currency Risk:* Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- *Reinvestment Risk:* This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- *Management Risk:* The advisor's investment approach may fail to produce the intended results. If the advisor's assumptions regarding the performance of a specific asset class or fund are not realized in the expected time frame, the overall performance of the Client's portfolio may suffer.
- *Equity Risk:* Equity securities tend to be more volatile than other investment choices. The value of an individual mutual fund or ETF can be more volatile than the market as a whole. This volatility affects the value of the Client's overall portfolio. Small- and mid-cap companies are subject to additional risks. Smaller companies may experience greater volatility, higher failure rates, more limited markets, product lines, financial resources, and less management experience than larger companies. Smaller companies may also have a lower trading volume, which may disproportionately affect their market price, tending to make them fall more in response to selling pressure than is the case with larger companies.
- *Fixed Income Risk:* The issuer of a fixed income security may not be able to make interest and principal payments when due. Generally, the lower the credit rating of a security, the greater the risk that the issuer will default on its obligation. If a rating agency gives a debt security a lower rating, the value of the debt security will decline because investors will demand a higher rate of return. As nominal interest rates rise, the value of fixed income securities held by a fund is likely to decrease. A nominal interest rate is the sum of a real interest rate and an expected inflation rate.
- *Investment Companies Risk:* When a Client invests in open end mutual funds or ETFs, the Client indirectly bears their proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value or (ii) trading of an ETF's shares may be halted if the listing exchange's

officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide “circuit breakers” (which are tied to large decreases in stock prices) halts stock trading generally. Adviser has no control over the risks taken by the underlying funds in which Client invests.

- *Foreign Securities Risk:* Funds in which Clients invest may invest in foreign securities. Foreign securities are subject to additional risks not typically associated with investments in domestic securities. These risks may include, among others, currency risk, country risks (political, diplomatic, regional conflicts, terrorism, war, social and economic instability, currency devaluations and policies that have the effect of limiting or restricting foreign investment or the movement of assets), different trading practices, less government supervision, less publicly available information, limited trading markets and greater volatility. To the extent that underlying funds invest in issuers located in emerging markets, the risk may be heightened by political changes, changes in taxation, or currency controls that could adversely affect the values of these investments. Emerging markets have been more volatile than the markets of developed countries with more mature economies.
- *Long-term purchases:* Long-term investments are those vehicles purchased with the intension of being held for more than one year. Typically, the expectation of the investment is to increase in value so that it can eventually be sold for a profit. In addition, there may be an expectation for the investment to provide income. One of the biggest risks associated with long-term investments is volatility, the fluctuations in the financial markets that can cause investments to lose value.
- *Short-term purchases:* Short-term investments are typically held for one year or less. Generally, there is not a high expectation for a return or an increase in value. Typically, short-term investments are purchased for the relatively greater degree of principal protection they are designed to provide. Short-term investment vehicles may be subject to purchasing power risk — the risk that your investment’s return will not keep up with inflation.
- *Options Trading:* The risks involved with trading options are that they are very time sensitive investments. An options contract is generally a few months. Clients should be aware that the use of options involves additional risks. The risks of covered call writing include the potential for the market to rise sharply. In such case, the security may be called away and the account will no longer hold the security. When purchasing options there is the risk that the entire premium paid for the option can be lost if the option is not exercised or otherwise sold prior to the option’s expiration date. When selling (“writing”) options, the risk of loss can be much greater if the options are written uncovered (“naked”). The risk of loss can far exceed the amount of the premium received for an uncovered option and in the case of an uncovered call option the potential loss is unlimited.

The risks associated with utilizing Sub-Advisors include:

- Manager Risk
 - Sub-Advisor fails to execute the stated investment strategy.
- Business Risk
 - Sub-Advisor has financial or regulatory problems.

- The specific risks associated with the portfolios of the Sub-Advisor are disclosed in the Form ADV Part 2 of the Sub-Advisor.

Item 9: Disciplinary Information

Criminal or Civil Actions

Zero Day and its management have not been involved in any criminal or civil action.

Administrative Enforcement Proceedings

Zero Day and its management have not been involved in administrative enforcement proceedings.

Self-Regulatory Organization Enforcement Proceedings

Zero Day and its management have not been involved in any self-regulatory organizational enforcement proceedings that are material to a Client's or prospective Client's evaluation of Zero Day or the integrity of its management.

Item 10: Other Financial Industry Activities and Affiliations

Broker-Dealer or Representative Registration

Zero Day is not registered as a broker-dealer and no affiliated representatives of Zero Day are registered representatives of a broker-dealer.

Futures or Commodity Registration

Neither Zero Day nor its affiliated representatives are registered or have an application pending to register as a futures commission merchant, commodity pool operator, or a commodity trading advisor.

Material Relationships Maintained by this Advisory Business and Conflicts of Interest

Affiliated representatives of Zero Day are licensed insurance agents. They will offer Clients insurance products and receive separate compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and Zero Day's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Recommendations or Selections of Other Investment Advisors and Conflicts of Interest

Zero Day may also utilize the services of a Sub-Advisor to manage Clients' investment portfolios. Prior to selecting a Sub-Advisor, Zero Day will ensure that they are properly licensed or registered as an investment advisor.

Sub-Advisors will maintain the models or investment strategies agreed upon between Sub-Advisor and Zero Day. Sub-Advisors execute all trades on behalf of Zero Day in Client accounts. Zero Day will be responsible for the overall direct relationship with the Client. Zero Day retains the authority to terminate the Sub-Advisor relationship at Zero Day's discretion.

Each Sub-Advisor utilized by Zero Day charges different asset management fees for the portfolios that they manage. In some cases the management fee for one Sub-Advisor may be lower than for another Sub-Advisor. This causes a conflict of interest because choosing

a Sub-Advisor with a lower fee means that Zero Day will retain more of the fee for themselves.

This practice represents a conflict of interest as Zero Day may select Sub-Advisors who charge a lower fee for their services than other Sub-Advisors. This conflict is mitigated by disclosures, procedures and by the fact that Zero Day has a fiduciary duty to place the best interest of the Client first when selecting Sub-Advisors.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics Description

The affiliated persons (affiliated persons include employees and/or independent contractors) of Zero Day have committed to a Code of Ethics ("Code"). The purpose of our Code is to set forth standards of conduct expected of Zero Day affiliated persons and addresses conflicts that may arise. The Code defines acceptable behavior for affiliated persons of Zero Day. The Code reflects Zero Day and its supervised persons' responsibility to act in the best interest of their Client.

One area which the Code addresses is when affiliated persons buy or sell securities for their personal accounts and how to mitigate any conflict of interest with our Clients. We do not allow any affiliated persons to use non-public material information for their personal profit or to use internal research for their personal benefit in conflict with the benefit to our Clients.

Zero Day's policy prohibits any person from acting upon or otherwise misusing non-public or inside information. No advisory representative or other affiliated person, officer or director of Zero Day may recommend any transaction in a security or its derivative to advisory Clients or engage in personal securities transactions for a security or its derivatives if the advisory representative possesses material, non-public information regarding the security.

Zero Day's Code is based on the guiding principle that the interests of the Client are our top priority. Zero Day's officers, directors, advisors, and other affiliated persons have a fiduciary duty to our Clients and must diligently perform that duty to maintain the complete trust and confidence of our Clients. When a conflict arises, it is our obligation to put the Client's interests over the interests of either affiliated persons or the company.

The Code applies to "access" persons. "Access" persons are affiliated persons who have access to non-public information regarding any Clients' purchase or sale of securities, or non-public information regarding the portfolio holdings of any reportable fund, who are involved in making securities recommendations to Clients, or who have access to such recommendations that are non-public.

Zero Day will provide a copy of the Code of Ethics to any Client or prospective Client upon request.

Investment Recommendations Involving a Material Financial Interest and Conflict of Interest

Zero Day and its affiliated persons do not recommend to Clients securities in which we have a material financial interest.

Advisory Firm Purchase of Same Securities Recommended to Clients and Conflicts of Interest

Zero Day and its affiliated persons may buy or sell securities that are also held by Clients. In order to mitigate conflicts of interest such as trading ahead of Client transactions, affiliated persons are required to disclose all reportable securities transactions as well as provide Zero Day with copies of their brokerage statements.

The Chief Compliance Officer of Zero Day is Travis Salley. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not front run or disadvantage trading for Clients.

Client Securities Recommendations or Trades and Concurrent Advisory Firm Securities Transactions and Conflicts of Interest

Zero Day does not have a material financial interest in any securities being recommended. However, affiliated persons may buy or sell securities at the same time they buy or sell securities for Clients. In order to mitigate conflicts of interest such as front running, affiliated persons are required to disclose all reportable securities transactions as well as provide Zero Day with copies of their brokerage statements.

The Chief Compliance Officer of Zero Day is Travis Salley. He reviews all trades of the affiliated persons each quarter. The personal trading reviews ensure that the personal trading of affiliated persons does not front run or disadvantage trading for Clients.

Item 12: Brokerage Practices

Factors Used to Select Broker-Dealers for Client Transactions

Zero Day requires that Clients establish brokerage accounts with the Schwab Advisor Services division of Charles Schwab & Co., Inc. ("Schwab"), a FINRA registered broker-dealer and SIPC member, to maintain custody of Clients' assets and to effect trades for their accounts. Zero Day is independently owned and operated and not affiliated with Schwab. Zero Day has evaluated Schwab and believes that it will provide our Clients with a blend of execution services, commission costs and professionalism that will assist our firm in meeting our fiduciary obligations to Clients.

Schwab provides Zero Day with access to its institutional trading and custody services, which are typically not available to Schwab retail investors. These services are not contingent upon our firm committing to Schwab any specific amount of business (assets in custody or trading commissions). Schwab's brokerage services include the execution of securities transactions, custody, research, and access to mutual funds and other investments that are otherwise generally available only to institutional investors or would require a significantly higher minimum initial investment.

For our Client accounts maintained in its custody, Schwab generally does not charge separately for custody services but is compensated by account holders through commissions and other transaction-related or asset-based fees for securities trades that are executed through Schwab or that settle into Schwab accounts.

Schwab also makes available to Zero Day other products and services that benefit Zero Day but may not directly benefit our Clients' accounts. Many of these products and services may

be used to service all or some substantial number of our Client accounts, including accounts not maintained at Schwab.

Schwab's products and services that assist Zero Day in managing and administering our Clients' accounts include software and other technology that:

- provide access to Client account data (such as trade confirmations and account statements);
- facilitate trade execution and allocate aggregated trade orders for multiple Client accounts;
- provide research, pricing and other market data;
- facilitate payment of our fees from Clients' accounts; and
- assist with back-office functions, recordkeeping and Client reporting.

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services may include:

- compliance, legal, technology and business consulting;
- educational conferences and events;
- marketing consulting and support;
- publications and conferences on practice management and business succession; and
- access to employee benefits providers, human capital consultants and insurance providers.

Schwab may make available, arrange and/or pay third-party vendors for the types of services rendered to Zero Day. Schwab may discount or waive fees it would otherwise charge for some of these services or pay all or a part of the fees of a third-party providing these services to our firm. Schwab may also provide other benefits such as educational events or occasional business entertainment of our personnel. In evaluating whether to recommend or require that Clients custody their assets at Schwab, we may take into account the availability of some of the foregoing products and services and other arrangements as part of the total mix of factors we consider and not solely on the nature, cost or quality of custody and brokerage services provided by Schwab, which creates a conflict of interest. Zero Day may have an incentive to select or recommend a broker-dealer based on Zero Day's interest in receiving the research or other products or services, rather on the Clients' interest in receiving most favorable execution.

- *Research and Other Soft Dollar Benefits*

The Securities and Exchange Commission defines soft dollar practices as arrangement under which products or services other than execution services are obtained by LWPG from or through a broker-dealer in exchange for directing Client transactions to the broker-dealer. Although Zero Day has no formal soft dollar arrangements, Zero Day may receive products, research and/or other services from custodians or broker-dealers. As permitted by Section 28(e) of the Securities Exchange Act of 1934, Zero Day receives economic benefits as a result of commissions generated from securities transactions by the custodian or broker-dealer from the accounts of Zero Day. Zero Day cannot ensure that a particular Client will benefit from soft dollars or the Client's transactions paid for the soft dollar benefits. Zero Day does not seek to proportionately allocate benefits to Client accounts to any soft dollar benefits generated by the accounts.

A conflict of interest exists when Zero Day receives soft dollars which could result in higher commissions charged to Clients. This conflict is mitigated by the fact that Zero Day has a fiduciary responsibility to act in the best interest of its Clients and the services received are beneficial to all Clients.

- *Brokerage for Client Referrals*
Zero Day does not receive Client referrals from any custodian in exchange for using that broker-dealer.
- *Directed Brokerage*
Clients who direct brokerage outside our recommendation may be unable to achieve the most favorable execution of Client transactions as Client directed brokerage may cost Clients more money. For example, in a directed brokerage account, you may pay higher brokerage commissions because we may not be able to aggregate orders to reduce transaction costs, or you may receive less favorable prices. Not all advisors require their Clients to direct brokerage.

Aggregating Securities Transactions for Client Accounts

Zero Day is authorized in its discretion to aggregate purchases and sales and other transactions made for the account with purchases and sales and transactions in the same securities for other Clients of Zero Day. All Clients participating in the aggregated order shall receive an average share price with all other transaction costs shared on a pro-rated basis. If aggregation is not allowed or infeasible and individual transactions occur (e.g., withdrawal or liquidation requests, odd-lot trades, etc.) an account may potentially be assessed higher costs or less favorable prices than those where aggregation has occurred.

Item 13: Review of Accounts

Schedule for Periodic Review of Client Accounts or Financial Plans and Advisory Persons Involved

Account reviews are performed quarterly by an Investment Advisor Representative of Zero Day. Account reviews are performed more frequently when market conditions dictate. Reviews of Client accounts include, but are not limited to, a review of Client documented risk tolerance, adherence to account objectives, investment time horizon, suitability criteria and reviewing target allocations of each asset class to identify if there is an opportunity for rebalancing.

Financial plans are updated as requested by the Client and pursuant to a new or amended agreement.

Review of Client Accounts on Non-Periodic Basis

Other conditions that may trigger a review of Clients' accounts are changes in the tax laws, new investment information and changes in a Client's own situation.

Content of Client Provided Reports and Frequency

Clients receive written account statements no less than quarterly for managed accounts. Account statements are issued by the Client's custodian. Client receives confirmations of each transaction in account from custodian and an additional statement during any month in which a transaction occurs.

Item 14: Client Referrals and Other Compensation

Economic Benefits Provided to the Advisory Firm from External Sources and Conflicts of Interest

Zero Day does not receive any economic benefits from external sources.

Advisory Firm Payments for Client Referrals

Zero Day does not compensate for Client referrals.

Item 15: Custody

Account Statements

All assets are held at qualified custodians, which means the custodians provide account statements directly to Clients at their address of record at least quarterly. Clients are urged to carefully compare the account statements received directly from their custodians to any documentation or reports prepared by Zero Day. Zero Day is deemed to have limited custody solely because advisory fees are directly deducted from Client's accounts by the custodian on behalf of Zero Day.

Item 16: Investment Discretion

Discretionary Authority for Trading

Zero Day requires discretionary authority to manage securities accounts on behalf of Clients. Zero Day has the authority to determine, without obtaining specific Client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold. Client will authorize Zero Day discretionary authority to execute selected investment program transactions as stated within the Investment Advisory Agreement.

Zero Day allows Clients to place restrictions on their discretionary authority, as outlined in the Client's Investment Policy Statement or similar document. These restrictions must be provided to Zero Day in writing.

The Client approves the custodian to be used and the commission rates paid to the custodian. Zero Day does not receive any portion of the transaction fees or commissions paid by the Client to the custodian.

Item 17: Voting Client Securities

Proxy Votes

Zero Day does not vote proxies on securities. Clients are expected to vote their own proxies. The Client will receive their proxies directly from the custodian of their account or from a transfer agent.

When assistance on voting proxies is requested, Zero Day will provide recommendations to the Client. If a conflict of interest exists, it will be disclosed to the Client. If the Client requires assistance or has questions, they can reach out to the investment advisor representatives of the firm at the contact information on the cover page of this document.

Item 18: Financial Information

Balance Sheet

A balance sheet is not required to be provided to Clients because Zero Day does not serve as a custodian for Client funds or securities and Zero Day does not require prepayment of fees of more than \$1200 per Client and six months or more in advance.

Financial Conditions Reasonably Likely to Impair Advisory Firm's Ability to Meet Commitments to Clients

Zero Day has no condition that is reasonably likely to impair our ability to meet contractual commitments to our Clients.

Bankruptcy Petitions during the Past Ten Years

Zero Day has not had any bankruptcy petitions in the last ten years.

Item 1 Cover Page
SUPERVISED PERSON BROCHURE
FORM ADV PART 2B

Travis Salley



Zero Day Capital Enterprises LLC

Office Address:
309 Alexander Place Suite B
West Point, NY 10996

Tel: 702-271-3265

Email: travis@zerodaycapital.com

Website: www.zerodaycapital.com

January 14, 2025

This brochure supplement provides information about Travis Salley and supplements the Zero Day Capital Enterprises LLC brochure. You should have received a copy of that brochure. Please contact Travis Salley if you did not receive the brochure or if you have any questions about the contents of this supplement.

ADDITIONAL INFORMATION ABOUT TRAVIS SALLEY (CRD #6523971) IS AVAILABLE ON THE SEC'S WEBSITE AT WWW.ADVISERINFO.SEC.GOV.

Brochure Supplement (Part 2B of Form ADV)

Supervised Person Brochure

Principal Executive Officer – Travis Salley

- Year of birth: 1990
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Item 2 - Educational Background and Business Experience

Educational Background:

- University of Nevada-Reno; Bachelor of Arts – Music; 05/2013
- University of Massachusetts-Amherst; Master of Music; 05/2015
- University of Southern Mississippi; Master of Arts – History; 05/2024

Business Experience:

- Zero Day Capital Enterprises LLC; Principal/CCO; 05/2024 – Present
 - U.S. Army; Commissioned Officer; 06/2010 – Present
 - Empirikal Partners LLC; Investment Advisor Representative; 03/2020 – 07/2024
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Item 3 - Disciplinary Information

Criminal or Civil Action: None to report.

Administrative Proceeding: None to report.

Self-Regulatory Proceeding: None to report.

Item 4 - Other Business Activities

Mr. Salley is a licensed insurance agent. Approximately 5% of his time is spent on these activities. He will offer Clients insurance products and receive separate compensation.

This practice represents a conflict of interest because it gives an incentive to recommend products based on the commission amount received. This conflict is mitigated by disclosures, procedures and Zero Day's fiduciary obligation to place the best interest of the Client first and the Clients are not required to purchase any products. Clients have the option to purchase these products through another insurance agent of their choosing.

Item 5 - Additional Compensation

Mr. Salley does not receive any performance-based fees and does not receive any additional compensation for performing advisory services other than what is described in Item 5 of Part 2A.

Item 6 - Supervision

Mr. Salley is the Chief Compliance Officer of Zero Day. He is responsible for all supervision, formulation and monitoring of investment advice offered to Clients. He will adhere to the policies and procedures as described in Zero Day's Compliance Manual. He can be reached at 702-271-3265 or travis@zerodaycapital.com.