CLIENT RELATIONSHIP SUMMARY
NOVEMBER 1, 2026
EL MENUDO CUENTA LLC

INTRODUCTION

El Menudo Cuenta LLC ("EMC") is registered with the Securities and Exchange Commission ("SEC") as an investment adviser. Brokerage services and investment advisory services differ, including in the fees they charge. It is important to understand these differences. Free and simple tools to research firms and financial professionals are available at Investor.gov/CRS, which also provides educational materials about broker-dealers, investment advisers, and investing.

RELATIONSHIPS & SERVICES

What Investment Services and Advice Can You Provide to Me?

EMC offers investment advisory services to retail investors through its mobile application and supporting website (the "EMC App"). Clients may establish non-retirement and retirement investment accounts ("EMC Accounts"), subject to applicable account eligibility and subscription-plan limits. EMC provides discretionary investment management through model portfolios and automated account monitoring, rebalancing, and reinvestment.

EMC offers five model portfolios designed for different investment horizons and risk tolerances. Investment strategies available within the portfolios may include Growth, Income, Cash Yield, Balanced, Christian Values, International Equities, and US Equities. These are investment strategies, not separate subscription plans or necessarily separate model portfolios. The EMC App uses information supplied in the client's investor profile, including financial circumstances, goals, investment horizon, and risk tolerance, to recommend an appropriate portfolio. Clients should keep this information current.

For more information about advisory services, portfolio construction, investment strategies, account monitoring, and the Form ADV Part 2A Brochure, visit https://www.elmenudocuenta.com/legal.

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?

FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT

What Fees Will I Pay?

EMC Accounts are separately managed accounts offered under a wrap fee program. The subscription fee ("Subscription Fee") covers advisory management and certain brokerage, execution, clearing, custody and account reporting services, and, where applicable, IRA custodian and administration services. Subscription Fees are not negotiable. The fee depends on the selected plan and billing frequency.

EMC offers two plans: Basic at $5.00 per month or $49.99 per year, and Premium at $10.00 per month or $99.99 per year. Annual pricing represents a savings of $10.01 for Basic and $20.01 for Premium compared with twelve monthly payments.

Basic includes one investment or retirement account, automatic rebalancing and reinvestment, and access to professionally constructed investment portfolios. Premium includes multiple investment and/or retirement accounts, automatic rebalancing and reinvestment, professionally constructed portfolios, and educational content on investing and personal finance.

Monthly and annual subscription payments are processed through Stripe, a third-party payment processor supporting multiple payment methods. Subscription charges recur according to the client's selected billing frequency. Accepted payment methods depend on availability through Stripe.

Additional fees and expenses may apply, including underlying mutual fund or exchange-traded fund expenses. You will pay fees and costs whether you make or lose money on your investments. Fees and costs reduce the amount of money you may make over time. Please make sure you understand the fees and costs you are paying. See https://www.elmenudocuenta.com/legal for additional information.

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 must act in your best interest and not place our interests ahead of yours. The way we make money creates potential conflicts of interest. You should understand and ask us about these conflicts because they can affect the advice we provide. For additional information about conflicts, see https://www.elmenudocuenta.com/legal.

Questions to ask your financial professional: How might your conflicts of interest affect me, and how will you address them?

How do your financial professionals make money?

Our financial professionals receive a base salary and may receive discretionary bonuses based on the overall success of the firm. See https://www.elmenudocuenta.com/legal for additional information about compensation.

DISCIPLINARY HISTORY

Do You or Your Financial Professionals Have Legal or Disciplinary History?

No. Visit Investor.gov/CRS for a free search tool to research the firm and its financial professionals.

Questions to ask your financial professional: As a financial professional, do you have any disciplinary history? For what type of conduct?

ADDITIONAL INFORMATION

Additional information about EMC and its investment advisory services is available at https://www.elmenudocuenta.com/legal. You may request a current copy of this Relationship Summary by calling (786) 845-6878. Additional information is available at Investor.gov/CRS.

Questions to ask your financial professional: Who is my primary contact person? Is that person 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?

SUPPLEMENTAL DISCLOSURES AND LINKED TOPICS

The following additional descriptions reflect the topics addressed in the original Form CRS hyperlink appendix. The EMC legal page is the central reference for the applicable disclosures: https://www.elmenudocuenta.com/legal.

Investor.gov/CRS

EMC offers five model portfolios across investment horizons and risk tolerances. Available investment strategies within those portfolios may include Growth, Income, Cash Yield, Balanced, Christian Values, International Equities, and US Equities. EMC's model portfolios are designed to reflect target asset allocations across various asset classes, for example, stocks (equities) and bonds (fixed income). The EMC model portfolios are also designed to reflect investment outlooks and risk tolerances ranging from 'conservative' to 'aggressive'. EMC designs the portfolios and manages their target asset allocations using strategies based on modern portfolio theory. EMC uses a proprietary computer software-based algorithm to match each client's EMC Account(s) to the portfolio best suited to the client's investment goals based on an investor that each client creates and maintains through the EMC App.

EMC's software-based algorithm determines a client's portfolio by selecting the best suited portfolio based on a client's investor profile questionnaire, which incorporates a client's financial situation, investment horizon, and risk profile, among other factors. The EMC App will match the client's investment profile with the strategy. Clients may then either accept the recommended strategy or select alternative strategies based upon the client's assessment of his/her own investment goals. As a result, EMC recommends that you ensure that your financial condition, risk tolerance and investment goals are kept current in your investor profile on the EMC App in order to receive the most up to date portfolio recommendations.

As you make deposits into, or withdrawals from, your EMC Accounts, the corresponding transactions executed by EMC are designed to rebalance the account toward the target allocation of the relevant portfolio. Upon your request to withdraw cash from an EMC Account, sales of securities held in your portfolio are initiated in a manner designed to maintain the target allocation for the relevant portfolio. EMC will initiate a rebalancing if an EMC Account's holdings deviate significantly (e.g. by 5% or more) from your portfolio's target allocation. In this way, EMC will seek to maintain your target asset allocation through market fluctuations, withdrawals, deposits, and other events that could cause deviations, while seeking to minimize the transaction costs of frequent portfolio rebalancing.

The rebalancing and reinvestment processes are automated. As a result, EMC's investment models will sell over-concentrated securities and use the proceeds to buy under-concentrated securities to better reflect target allocations regardless of market or other dynamics. The risks and limitations of the automated process could result in the continued purchase of underperforming securities and the sale of better performing securities to achieve the targeted allocation. All transaction specific costs are covered under the subscription fee paid by you, and you incur no additional transactional costs or fees. In some market conditions, this creates capital gains and potentially other tax liabilities.

EMC intends to place all brokerage orders through independent third-party broker(s) ("Independent Brokers"), to buy, rebalance, and sell as necessary to maintain the asset allocation of the portfolio that EMC has selected for each EMC Account. By bundling brokerage services through Independent Brokers with advisory services through EMC, EMC believes that it simplifies the investment process for you.

The Independent Brokers will provide confirmations and statements to you through the EMC App. The Independent Brokers will also act as custodian to hold your funds and EMC Account securities in

safekeeping and as clearing broker to execute, clear, and settle securities trades on an omnibus basis. Since the Independent Broker(s) serves as broker for all EMC Accounts, clients may benefit from savings on execution costs that would not be available without volume trading discounts or batched orders. Additionally, there are instances where aggregating orders will be the only means of creating an order that is in whole shares. Conflicts of interest may exist with respect to aggregating orders of various clients. To mitigate any such conflicts of interest, all clients participating in the aggregated order receive an average share price with all other transaction costs shared on a pro-rata basis. EMC will require that the Independent Broker(s) aggregate transactions consistent with their duty to seek best execution and consistent with the terms of the EMC Wrap Program agreements. Under no circumstances will an advisory client be favoured over any other advisory client.

EMC reserves the right to change its subscription plans and fee schedules from time to time. Some clients may be subject to legacy fee schedules that differ from current published rates. Refer to the agreement applicable to your account and subscription selection.

Subscription Fees are billed monthly or annually, as selected by the client, and payments are processed by Stripe, a third-party payment processor offering multiple payment methods.

Pursuant to the EMC Account documentation, to the extent you do not have sufficient funds in you funding source to cover the Subscription Fee, or have broken the link to your funding source, EMC reserves the right to sell shares in your EMC Account to pay such Subscription Fee.

Clients are charged a subscription-based wrap fee and all transaction costs are paid by EMC from Subscription Fee proceeds. The costs incurred in delivering services to you will be impacted by a number of factors, including the both the cost and frequency of trading in your account, administrative and custody fees charged by the Independent Brokers selected by EMC to participate in the EMC Wrap Fee Program, and other costs inherent in managing the EMC Account(s). The costs of advisory and other services that are reflected in the Subscription Fee may exceed the costs of similar services purchased separately.

As part of our investment advisory services to you, the EMC model investment portfolios may indicate that your EMC Account(s) should invest in mutual funds and exchange traded funds (ETFs). The

Subscription Fee you pay to EMC for investment advisory services are separate and distinct from the fees and expenses charged by mutual funds or ETFs (described in each fund's prospectus) to their shareholders. These fees will generally include a management fee and other fund expenses that cover the underlying operating expenses, management fees, marketing costs, custodial fees and other fees of the ETF or mutual fund. These fees are entirely separate and distinct from the Subscription Fees paid to EMC for the EMC Wrap Fee Program. To fully understand the total cost you will incur, you should review all the fees charged by mutual funds, ETFs, our Firm, and others.

EMC may enter into arrangements with affiliate partners who, for compensation, will refer prospective clients to EMC. Each such arrangement will be governed by a written agreement between EMC and the affiliate partner and will be disclosed to the prospective client, as required by law.

Additionally, EMC may pay referral fees to existing clients in connection with client referrals of new clients (the “EMC Referral Program”). The Firm intends to provide additional information on the EMC Referral Program, through its application website. EMC does not compensate salespersons or enter into professional solicitation service agreements.

The amount of compensation paid to affiliate partners or clients under the EMC Referral Program may be more than if the client paid separately for investment adviser, brokerage, and other services from other investment advisers or if the client participated in another investment advisers wrap fee program. Therefore, that referral person may have a financial incentive to recommend the EMC Wrap Fee Program over other programs or services that may be available to you.

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.

EMC aggregates the orders that we are going to place on behalf of our clients before sending them to our clearing broker for execution. We send these aggregated orders to the Independent Brokers only at certain fixed times each trading day. We obtain an average price for the aggregated order and provide it to all customer accounts purchasing or selling shares in that trading period equally. This process could cause a delay in a particular order being executed and on occasion, it could be possible that some orders on behalf of certain accounts receive more favorable execution than others based on this aggregation process. Finally, some of the securities within our portfolios may include investments in securities in which we, our employees and/or principals have an economic interest. As described in the “What fees will I pay?” section above, our tiered fee structure benefits EMC when you open additional accounts and use more services.

Our financial professionals are compensated with a base salary and discretionary bonus based upon the overall success of the firm. Our professionals are not compensated based upon any other factors. The discretionary compensation is based on a variety of company benchmarks, which incentivizes the company and its financial professionals to grow the number of subscribers, increase the number of services offered and ultimately, the amount of subscription fees earned.

Current subscription plans and payment processing

Basic: $5.00 monthly or $49.99 annually (one investment or retirement account). Premium: $10.00 monthly or $99.99 annually (multiple investment and/or retirement accounts and educational content). Both plans include automated rebalancing and reinvestment and professionally constructed portfolios. Stripe processes monthly and annual payments. If the funding source lacks sufficient funds or is disconnected, EMC reserves the right, pursuant to applicable account documentation, to sell shares in an EMC Account to pay an unpaid Subscription Fee.