# Services, Fees and Compensation

El Menudo Cuenta LLC (“EMC” or “the Firm”) is an investment adviser registered with the Securities and Exchange Commission (SEC) under the Investment Advisers Act of 1940, intending to provide internet adviser services in reliance on Rule 203(A)-2(e) under the Advisers Act. Investment advisory services are provided to EMC clients through an EMC-sponsored Wrap Fee Program.

Our Form ADV Part 2A (Brochure) describes the EMC Wrap Fee Program, which bundles investment advisory, brokerage, custody, clearing and settlement, and other administrative services and charges a single inclusive advisory fee.

The Firm is a Delaware limited liability company founded in 2023. Its principal owner is Xavier Serbia, and its headquarters is located in Miami, Florida. EMC is organized under the laws of the State of Delaware.

Revised: November 1, 2026.

The following sections describe our services and fees. Please refer to each investment advisory service for information about how we tailor our services to your needs. “We,” “our,” and “us” refer to EMC; “you,” “your,” and “Client” refer to current or prospective clients. “Associated Persons” means the Firm’s officers, employees, and other individuals providing investment advice on behalf of the Firm.

## 1. Services

EMC investment opportunities are designed to encourage automated investments in non-retirement and retirement accounts. EMC does not intend to provide comprehensive financial planning or tax, accounting, or legal advice. EMC advisory services are provided exclusively through its mobile application and supporting website (together, the “EMC App”).

EMC offers investment accounts (“EMC Accounts”) managed through five model portfolios with differing objectives, asset allocations, and risk profiles, including the MC Portfolio Corta Duración (fixed-income duration of less than one year). The investment strategies—Growth, Income, Cash Yield, Balanced, Christian Values, International Equities, and US Equities—are investment strategies within the portfolios, not membership tiers or seven separate portfolios. Portfolios reflect target allocations across asset classes, such as equities and fixed income, and risk profiles ranging from conservative to aggressive. EMC designs and manages these allocations using principles of modern portfolio theory.

EMC uses a proprietary software-based algorithm to assign each EMC Account to the portfolio most suited to the client’s investment objectives and investor profile created and maintained in the EMC App. The investor profile questionnaire considers the client’s financial situation, investment horizon, and risk tolerance, among other factors. EMC recommends that clients keep these details and their investment goals up to date.

When clients make deposits to or withdrawals from their EMC Accounts, the corresponding transactions are designed to rebalance the account toward the target allocation of the applicable portfolio. Upon a cash withdrawal request, securities may be sold in a manner intended to maintain that allocation. EMC will initiate rebalancing when an EMC Account’s holdings deviate significantly—for example, by 5% or more—from the portfolio’s target allocation. EMC thereby seeks to maintain the target asset allocation through market fluctuations, deposits, withdrawals, and other events, while seeking to minimize the costs of

frequent rebalancing.

Rebalancing and reinvestment are automated. EMC investment models may therefore sell overweight securities and use the proceeds to buy underweight securities, regardless of market conditions. Risks and limitations include continued purchases of underperforming securities and sales of better-performing securities to achieve target allocations. Transaction-specific costs covered by the program are included in the Subscription Fee, with no additional transaction charges for those covered costs. In certain market conditions, transactions may generate capital gains and other tax liabilities.

EMC intends to place brokerage orders through one or more independent third-party brokers ("Independent Brokers") to buy, rebalance, and sell securities as needed to maintain the selected portfolio allocation for each EMC Account. EMC believes bundling independent brokerage services with its advisory services simplifies the investment process.

Independent Brokers will provide confirmations and statements to EMC clients through the EMC App. They will also act as custodians of EMC Account funds and securities and as clearing brokers to execute, clear, and settle securities transactions on an aggregated basis.

Because Independent Brokers serve EMC Accounts, clients may benefit from execution cost savings resulting from volume discounts or batched orders. In some circumstances, aggregation is necessary to create an order in whole shares. Aggregation of orders for different clients may create conflicts of interest. To mitigate these conflicts, clients participating in an aggregated order receive an average share price, and other transaction costs are allocated pro rata. EMC will require Independent Brokers to aggregate transactions consistently with their duty to seek best execution and the terms of the EMC Wrap Fee Program agreements. No advisory client will be favored over another.

EMC does not engage in "soft dollar" arrangements.

Information about EMC investment advisory services in this document is qualified in its entirety by the EMC Account documentation accepted by each client when opening an account.

## 2. Costs and Subscription Fees

Wrap arrangements, wrap fee programs, and wrap fee accounts involve individually managed accounts offered within a broader program sponsored, typically, by a brokerage, banking, or investment advisory firm. EMC sponsors its Wrap Fee Program through agreements with independent brokerage firms and acts as the program sponsor and adviser.

Clients pay EMC a Subscription Fee for access to its investment platform, based on the monthly or annual billing option selected. The fee covers trade execution, clearing, custody, account reporting, and, where applicable, IRA custodian and administrator services. Subscription Fees are non-negotiable and depend on the selected membership and billing option.

| Membership | Monthly billing | Annual billing |
|---|---|---|
| Basic | US$5/month | US$49.99/year |
| Premium | US$10/month | US$99.99/year |

Basic: allows one (1) investment or retirement account and includes automatic rebalancing and reinvestment and access to expert-built advanced portfolios. It does not include opening multiple accounts or access to the investment and retirement educational content identified for Premium.

Premium: allows multiple investment accounts, retirement accounts, or a combination of both; includes automatic rebalancing and reinvestment, expert-built advanced portfolios, the ability to open multiple accounts, and access to educational content on investing and personal finance.

The annual option costs US$49.99 for Basic (equivalent to approximately US$4.17 per month, saving US$10.01 compared with twelve monthly payments) or US$99.99 for Premium (equivalent to approximately US$8.33 per month, saving US$20.01 compared with twelve monthly payments). Monthly equivalents are for illustration only: the annual option is billed annually, not in twelve monthly installments.

EMC reserves the right to modify membership offerings and Subscription Fees from time to time. Accordingly, some clients may be subject to legacy fees higher or lower than those stated here. Existing clients should consult the Program Agreement accepted at account opening or upon a client-initiated membership change.

Clients should understand that EMC is designed for individuals making frequent recurring investments. Its fee structure may not be suitable for individuals intending to make only a few investments or infrequent small-dollar investments.

The Subscription Fee is charged monthly or annually, according to the selected option, through recurring ACH debit and/or electronic funds transfer from the client’s linked checking account or investment account maintained with the broker-dealer custodian, subject to applicable account documentation and authorizations.

Under the EMC Account documentation, if a client lacks sufficient funds in the payment source to cover the Subscription Fee, or the link to that source is broken, EMC reserves the right to sell securities in the client’s EMC Account to satisfy the outstanding Subscription Fee, to the extent permitted under the applicable agreements.

Clients pay one wrap-program Subscription Fee at the selected billing frequency, and EMC pays covered transaction costs from Subscription Fee proceeds. Service costs depend on factors including the cost and frequency of trading, administrative and custody charges of Independent Brokers, and other expenses inherent in managing EMC Accounts. The costs of advisory and other services included in the Subscription Fee may exceed those of similar services purchased separately.

## 3. Additional Fees and Costs

As part of EMC advisory services, model portfolios may invest in mutual funds and exchange-traded funds (ETFs). The Subscription Fee paid to EMC is separate and distinct from fees and expenses charged by mutual funds or ETFs to their shareholders, as described in each fund’s prospectus. These generally include management fees and other fund operating, management, marketing, and custody expenses. Such charges are separate from the EMC Wrap Fee Program Subscription Fee. To understand total investment costs, clients should review all fees charged by funds, ETFs, EMC, and other service providers.

## 4. Referral Compensation

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

EMC may also pay referral compensation to existing clients who refer new clients (the “EMC Referral Program”). The Firm intends to provide additional information about the EMC Referral Program through its application website. EMC does not compensate salespersons or enter into professional solicitation service agreements.

Compensation paid to affiliate partners or clients under the EMC Referral Program may be greater than compensation received if a client purchased advisory, brokerage, and other services separately from other investment advisers or participated in another adviser’s wrap fee program. Accordingly, a referring person may have a financial incentive to recommend the EMC Wrap Fee Program over other programs or services available to the client.

Update note: This document incorporates the membership fees and benefits communicated by EMC on November 1, 2026. The exact names and descriptions of the other four portfolios, as well as the operational details of annual billing, should be checked against the current Form ADV and agreements before final publication.