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## INTRODUCTION

El Menudo Cuenta LLC is registered with the Securities and Exchange Commission as an investment adviser. We refer to EL Menudo Cuenta, LLC as “EMC”. In the investment business, there is a difference between brokerage fees and fees for advisory services and it is important for you to understand these differences. 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.

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## RELATIONSHIPS & SERVICES

### What Investment Services and Advice Can You Provide to Me?

EMC only offers investment services and advice to retail investors. As part of such services we offer you the ability to make automatic investments in non-retirement and retirement products. EMC’s investment advisory services are provided exclusively through EMC’s mobile application and supporting website (together, the “EMC App”).

EMC offers investment accounts (“EMC Accounts”) reflecting a range of investment strategies. Each of these strategies will be implemented through the use of model portfolios. The EMC model portfolios are designed to reflect investment outlooks and risk tolerances ranging from ‘conservative’ to ‘aggressive’. 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.

As part of EMC’s standard service, your EMC Accounts are monitored automatically on a daily basis by the EMC App.

A description of our discretionary investment services, our investment strategies, and our account monitoring can be found at: <https://elmenudocuenta.com/servicesdescription/>.

Also, see our Form ADV Part 2 Brochure, Item 4 at <https://glovista.net/formadvpart2/> for more

information regarding our specific investment strategies.

### Additional Information:

**You may obtain more information regarding our advisory services, including information regarding the services that we provide and the types of clients that we have, by reviewing our Form ADV Part 2A Brochure, Item 4 and 7 at <https://elmenudocuenta.com/formadvpart2/>.**

*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?

For each EMC Account opened by you, EMC will open a separately managed account held in a “wrap fee program” (Wrap Account). A Wrap Account is an investment account where a “wrapped fee” covers all of the management, brokerage, and administrative expenses for the account. EMC clients pay a monthly subscription fee (“Subscription Fee”) to EMC for access to the EMC investment platform and each EMC Account. The Subscription Fee covers the costs of trade execution, clearance, custody, account reporting, and, if applicable, the services of the IRA Custodian and Administrator. Subscription Fees are not negotiable. The amount of the Subscription Fee depends on the Subscription tier in which a client is enrolled/subscribed, as further described below.

EMC offers three tiers of monthly Subscription Fees ranging from \$3 to \$8. Each tier provides different levels of service including direct deposit functionality and certain access to investment educational tools.

For additional detailed information about how fees are determined, the services provided with each tier of Subscription Fees offered, and the conflicts that exist as a result of our fees please visit <https://elmenudocueta.com/feesdescription/>.

In addition, you may incur other fees and costs. To see a description of these other fees and costs, see <https://elmenudocueta.com/otherfeesandcosts/>.

**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 more information about your fees and costs, including information regarding how fees are paid from your account, frequency of payment, types of fees or expenses you may pay, brokerage and other transaction costs, refunds of fees and other fee related matters, see our Form ADV Part 2A Brochure, Item 4 at <https://elmenudocueta.comt/formadvpart2/>.**

*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. Some examples to help you understand what that means can be found at <https://elmenudocueta.com/conflicts/>.

#### **Additional Information:**

**More detailed information about conflicts of interest may be found in our Form ADV Part 2A Brochure at <https://elmenudocueta.com/formadvpart2/>.**

*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 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. To see other ways some financial professionals are compensated, visit <https://elmenudocueta.com/compensationfactors/>.

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## DISCIPLINARY HISTORY

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

No. Please visit [Investor.gov/CRS](http://Investor.gov/CRS) for a free and simple search tool to research you and your financial professionals.

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

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## ADDITIONAL INFORMATION

We encourage you to seek out additional information. You may find additional information about our investment advisory services at [www.elmenudocueta.com](http://www.elmenudocueta.com). You may request up-to-date information and request a copy of this Relationship Summary by calling us at (786) 845-6878. Additional information about us is also available on the SEC's website at [www.investor.gov/CRS](http://www.investor.gov/CRS).

*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?*

## **HYPERLINKS:**

[Investor.gov/CRS](https://investor.gov/CRS)

<https://elmenudocuenta.com/formadvpart2/>.

<https://elmenudocuenta.com/servicesdescription/>:

EMC offers investment accounts (“EMC Accounts”) reflecting a range of investment strategies, including Growth, Income, Cash Yield, Balanced, Christian Values, International Equities, and US Equities Portfolios. Each of these strategies will be implemented through the use of model portfolios. 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 will also be designed to reflect investment outlooks and risk tolerances ranging from ‘conservative’ to ‘aggressive’. EMC will design the portfolios and manage 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. In addition to the model portfolios described above, certain clients can affirmatively elect to allocate a portion of their EMC Accounts into a Custom Portfolio. An EMC Custom Portfolio is a non-discretionary investment advisory account that allows clients to invest a portion of their overall EMC Investment Account in shares of equity securities. In the EMC Custom Portfolio, the client is ultimately responsible for choosing which securities to invest in, when to purchase and sell securities, and how much to invest in each security. Clients with EMC Custom Portfolios are limited to purchasing and selling securities made available to the EMC App. Nothing about the selection of securities being provided should be construed as advice or a recommendation of an investment strategy. EMC may add, remove, re-categorize or replace the available investments in its discretion. In the event an investment is removed, it will no longer be available for additional investing.

Clients choosing to invest in an EMC Custom Portfolio should carefully review and consider the information available on the EMC App regarding each investment, as well as any applicable public company filing report before making any investment decision. A Client’s EMC Custom Portfolio can be concentrated to as few as one security. Therefore, EMC Custom Portfolios add additional security-specific concentration risk. In addition, the value of accounts may vary considerably in response to changes in market value of individual securities, industries or sectors and lead to volatility.

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. 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.

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

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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.

<https://elmenudocuenta.com/feesdescription/>:

EMC clients pay a monthly subscription fee (“Subscription Fee”) to EMC for access to the EMC investment platform. The Subscription Fee covers the costs of trade execution, clearance, custody, account reporting, and, if applicable, the services of the IRA Custodian and Administrator. Subscription Fees are not negotiable. The amount of the Subscription Fee depends on the Subscription tier in which a client is enrolled/subscribed, as further described below.

EMC offers three tiers of Subscription Fees:

- EMC Basic, a \$3 monthly Subscription Fee tier, includes a single EMC Investment Account, direct deposit functionality, and access to basic investment educational tools
- EMC Medium, a \$5 monthly Subscription Fee tier, includes up to three (3) EMC Investment Accounts, direct deposit functionality, trust accounts, access to more sophisticated educational tools
- EMC Premium, an \$8 monthly Subscription Fee tier, includes unlimited EMC Investment Accounts, direct deposit functionality, trust accounts, unlimited access to EMC educational tools

EMC reserves the right to change its Subscription Fee investors in separately managed accounts held in a wrap fee program (Wrap Accounts). A Wrap Account is an investment account where a “wrapped fee” covers all of the management, brokerage and administrative expenses for the account. tiers from time to time, and, as a result, some clients may be subject to legacy fee schedules which may be higher or lower than the current fee schedules described above. You should refer to the Program Agreement entered into with EMC at the time of account opening or client-initiated subscription fee tier change.

The Subscription Fee is charged monthly and paid by a recurring monthly ACH debit and electronic funds transfer that deducts money from your linked checking account or your investment account at the broker-dealer custodian.

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

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right to sell shares in your EMC Account to pay such Subscription Fee.

Clients are charged a single monthly wrap fee and all transaction costs are paid by EMC from the proceeds of the Subscription Fee. 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.

<https://elmenudocuenta.com/otherfeesandcosts/>:

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.

<https://elmenudocuenta.com/conflicts/>:

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.

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<https://elmenudocuenta.com/compensationfactors>

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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.

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