

**Pento Portfolio Strategies, LLC**  
**Form ADV, Part 3 - Customer Relationship Summary**  
**March 2021**

Pento Portfolio Strategies, LLC (the “Firm”) is registered with the Securities & Exchange Commission as an investment adviser. Brokerage and investment advisory services and fees differ, and it is important for you to understand these differences. *Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about broker-dealers, investment advisers, and investing.*

**What investment services and advice can you provide me?**

We provide fee-based Investment Supervisory Services, Tax and Accounting Services, Subscription Services and Signal Investing Services to retail investors including assessing suitability for the model portfolio. The Firm offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. We require a minimum account of \$100,000.00. We create an Investment Policy Statement (IPS) for each client, which outlines the client’s current financial situation and then decide suitability for the model portfolio. If we determine the client is not suitable, we construct a portfolio that matches that client’s specific situation. Investment Supervisory Services include Personal Investment Policy, Asset Selection, Investment Strategy, asset allocation, assessment of risk tolerance and portfolio monitoring. Our advisory services are discretionary in nature meaning that we will make the ultimate investment decisions without your permission. Investment management services entail quarterly internal reviews. Any advice provided is limited to Pento Portfolio Strategies products. We will review investment results, asset allocation, client objectives and other variables that may have been identified during the course of the engagement. The Firm advises clients to immediately notify it of any changes to client’s financial status in the event there needs to be a change in client’s investment plan. These reviews are made once a year, but may occur more frequently, depending upon the underlying assets in the portfolios, market conditions or as desired by the client. *For additional information, please see Form ADV, Part 2A brochure (Items 4 and 7 of Part 2A).*

**Conversation Starters.** *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?*

**What fees will I pay?**

Investment Supervisory Services fees and amounts are based on the final fee schedule. Fees may be negotiable depending upon the needs of the client, the final fee schedule is attached as Exhibit II of the Investment Advisory Contract. Lower fees for comparable services may be available from other sources.

Fees are paid quarterly in advance, based on the value of the account on the last business day of the prior quarter. Clients may terminate their contracts at any time by phone or email. Refunds are given on a prorated basis, based on the number of days the account is open during the final quarter. The fee refunded will be the balance of the fees collected in advance minus the daily rate\* times the number of days in the quarter up to and including the day of termination. These fees are “asset-based” meaning that the fee is calculated as a percentage of the assets invested in your advisory account according to the fee schedule in your advisory agreement with us. 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.

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, brokerage fees, mutual fund redemption fees, and the internal fees that mutual funds charge for management and administration and are disclosed in each mutual funds prospectus, transaction fees, etc.). Those fees are separate and distinct from the fees and expenses charged by the Firm. *For additional information, please see Form ADV, Part 2A brochure (Items 5.A, B, C, and D, and 12).*

**Conversation Starter.** 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. Here is an example to help you understand what this means:

- Retirement rollovers: If we recommend that a client rollover his/her retirement plan assets, such a recommendation creates a conflict of interest because we will earn new (or increase current) compensation as a result of the rollover.

**Conversation Starter.** Ask your financial professional:

*How might your conflicts of interest affect me, and how will you address them?*

*For additional information, please see our Form ADV, Part 2A brochure (Items 10. C, 11. C, D, 12. A, 14.B)*

**How do your financial professionals make money?**

Our financial professionals are compensated through the investment advisory fees earned by the Firm. This means that the more assets you invest in your account, the more you will pay in fees, and therefore *we have an incentive to encourage you to increase your advisory account assets.*

**Do you or your financial professionals have legal or disciplinary history?**

No. Visit <https://www.investor.gov/CRS> for a free and simple search tool to research us and our financial professionals.

**Conversation Starter.** Ask your financial professional:

*As a financial professional, do you have any disciplinary history? For what type of conduct?*

**For additional information about our services,** please visit our website <https://pentoport.com/>. If you would like additional, up-to-date, information or a copy of this disclosure, please call (732) 772-9500.

**Conversation Starter.** 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?*