PENTO PORTFOLIO STRATEGIES, LLC

Form CRS — Customer Relationship Summary

April 29, 2026

CRD #159217 | SEC-Registered Investment Adviser

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Pento Portfolio Strategies, LLC ("PPS," "we," "us," "our") is registered with the SEC as an investment adviser. Brokerage and investment advisory services differ and it is important for you to understand the differences. Free and simple tools are available to research firms and financial professionals at **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 discretionary, fee-based portfolio management and related services to retail investors. We make investment decisions for your account without asking permission each time. We document your goals, risk tolerance, and time horizon in an Investment Policy Statement.

IDEC Model Portfolio (primary strategy): Our actively managed Inflation/Deflation and Economic Cycle (IDEC) Model uses ~20 macroeconomic indicators to allocate assets across sectors and asset classes. We adjust allocations as conditions change. Minimum account: $100,000 (may be waived).

401(k) / Held-Away Account Management: We manage employer-sponsored retirement accounts through Pontera, a third-party platform, without taking custody.

Tax & Accounting Services: Individual and business tax preparation, tax planning, bookkeeping, and payroll. Separate fees apply.

Signal Investing (Castleview Partners): We provide IDEC strategy signals to Castleview Partners (CRD #281410), whose clients may invest in the strategy.

Podcast (Mid-Week Reality Check): Michael Pento's weekly insights on the economy, markets, and current events — provided for educational and entertainment purposes. Free to advisory clients; $50/year for others. Listening does not create an advisory relationship.

We review client accounts at least quarterly and monitor on an ongoing basis.

Questions to ask us:

- *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, licenses, education, and qualifications? What do these qualifications mean?*

More information: Items 4, 7, and 8 of our Form ADV Part 2A — adviserinfo.sec.gov (CRD #159217)

WHAT FEES WILL I PAY?

Service	Fee Type	Rate / Amount	Paid
IDEC Model Portfolio Mgmt	Asset-based (% AUM)	1.00%–1.50%/yr (breakpoints)	Quarterly in advance
401(k) Mgmt (Pontera)	Asset-based (% AUM)	Same as portfolio mgmt schedule	Quarterly in advance
Tax & Accounting	Fixed / hourly	Agreed upon before engagement	Per engagement
Podcast (Mid-Week Reality Check)	Annual flat fee	$50/yr (free to advisory clients)	Annual in advance

Fees are charged quarterly in advance as a percentage of your account value — the more assets you invest, the more you pay. **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.** You are also responsible for third-party fees (custodian, brokerage, fund expenses) which are separate from our fees. You may terminate at any time; unearned fees are refunded on a prorated basis.

Questions to ask us:

- *Help me understand how these fees and costs might affect my investments.*
- *If I give you $100,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

More information: Items 5 and 12 of our Form ADV Part 2A — adviserinfo.sec.gov (CRD #159217)

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 put our own interests 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 advice we provide you. Here are some examples to help you understand what this means:

AUM-based fees: We earn more when you invest more with us, creating an incentive to encourage consolidation or rollovers of retirement assets.

Tax & accounting cross-sell: When we provide both advisory and tax services, we have an incentive to recommend additional services. You are not required to use us for these.

Solicitor arrangements: We pay third-party solicitors 25%–50% of the advisory fees we collect from referred clients. Referred clients receive written disclosure of this arrangement.

Castleview Partners: We receive 0.50% of assets Castleview clients allocate to our IDEC strategy, creating an incentive to maintain and grow that relationship.

Schwab benefits: Our custodian, Charles Schwab Advisor Services, provides us technology and practice management support at no direct charge — an incentive to recommend Schwab.

Media appearances and podcast: Michael Pento makes regular public media appearances and produces the Mid-Week Reality Check, a weekly podcast featuring his insights on the economy and markets for educational and entertainment purposes. These activities may promote awareness of PPS's services. All media content is subject to our marketing compliance review program.

Questions to ask us:

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

More information: Items 10, 11, and 14 of our Form ADV Part 2A — adviserinfo.sec.gov (CRD #159217)

HOW DO YOUR FINANCIAL PROFESSIONALS MAKE MONEY?

Our financial professionals — Michael Pento (President and Portfolio Manager) and Justine Coleman (Chief Compliance Officer) — are compensated through the advisory fees earned by PPS. We do not earn commissions from the sale of securities or investment products and we do not accept performance-based fees. Our compensation is directly tied to the level of assets we manage for you.

DO YOU OR YOUR FINANCIAL PROFESSIONALS HAVE LEGAL OR DISCIPLINARY HISTORY?

No. Neither Pento Portfolio Strategies, LLC nor any of our financial professionals has any legal or disciplinary history to disclose. You can research us at no charge using the free SEC search tool at **Investor.gov/CRS**.

Questions to ask us:

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

WHERE CAN I FIND MORE INFORMATION?

For additional information about our services and fees, please visit pentoport.com or review our Form ADV Part 2A brochure at adviserinfo.sec.gov (search: Pento Portfolio Strategies or CRD #159217). To request a current copy of this relationship summary or our ADV brochure at no charge, contact us:

Phone: (732) 772-9500 **Email:** info@pentoport.com **Website:** pentoport.com

Questions to ask us:

- *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 I am being treated?*