

# **FIRM BROCHURE**

(Part 2A of Form ADV)

**January 31, 2023**

**Moneypaper Advisor, Inc.**  
111 Pleasant Ridge Road, Harrison NY 10528

**Part 2A of Form ADV (the “Brochure”) provides information about the qualifications and business practices of Moneypaper Advisor, Inc. If you have any questions about the contents of this Brochure, please contact us at (914) 925-0022 and/or [byronp@moneypper.com](mailto:byronp@moneypper.com)**

**Information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.**

**Moneypaper Advisor, Inc. is registered as an investment adviser with the U.S. Securities and Exchange Commission; however, such registration does not imply a certain level of skill or training and no inference to the contrary should be made.**

**Additional information about Moneypaper Advisor, Inc. is also available on the SEC’s website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

## **ITEM 1: COVER PAGE**

Please refer to previous page.

## **ITEM 2: MATERIAL CHANGES**

Pursuant to SEC Rules, Moneypaper Advisor will ensure that clients receive a summary of any material changes to this Brochure within 120 days of the close of the Firm's fiscal year end, along with a copy of this Brochure or an offer to provide the Brochure. Additionally, as Moneypaper Advisor experiences material changes in the future, we will send you a summary of our "Material Changes" under separate cover. For more information about the Firm, please contact the Firm at [byronp@moneypaper.com](mailto:byronp@moneypaper.com)

Additional information about the Firm and its investment adviser representatives is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov)

### ITEM 3: TABLE OF CONTENTS

<u>Item Number</u>	<u>Item</u>	<u>Page</u>
Item 1	Cover Page.....	2
Item 2	Material Changes .....	2
Item 3	Table of Contents.....	3
Item 4	Advisory Business .....	4
Item 5	Fees and Compensation .....	8
Item 6	Performance-Based Fees and Side-by-Side Management .....	11
Item 7	Types of Clients .....	11
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss .....	12
Item 9	Disciplinary Information.....	13
Item 10	Other Financial Industry Activities and Affiliations.....	13
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading..	14
Item 12	Brokerage Practices .....	15
Item 13	Review of Accounts .....	17
Item 14	Client Referrals and Other Compensation .....	18
Item 15	Custody .....	18
Item 16	Investment Discretion .....	19
Item 17	Voting Client Securities.....	19
Item 18	Financial Information.....	20

## **Item 4: Advisory Business**

### **A. Description of Firm**

Moneypaper Advisor, Inc., (“Moneypaper Advisor” or the “Firm”) is a Harrison NY -based investment management firm founded in 1989.

Moneypaper Advisor provides customized investment management services to registered investment management companies. As discussed more fully below, Moneypaper Advisor assists clients in investment management and cash flow management.

The firm only has one client. MP63 Fund, Inc, symbol DRIPX.,

Moneypaper Advisor is currently registered with the Securities and Exchange Commission ("SEC") as an investment adviser and with the State of New York as an S-corporation. Moneypaper Advisor is 100% owned by Ms. Vita Nelson, Moneypaper Publications.

### **B. Types of Advisory Services Offered**

Moneypaper Advisor primarily provides one type of advisory service: Investment Management Services.

#### **1. Investment Management Services**

Moneypaper Advisor offers clients Investment Management Services that encompass the traditional asset class of domestic equities. The Firm will generally manage a client’s investment portfolio on a discretionary basis and may assist the client in the establishment of the necessary custodial account(s). When exercising its discretionary authority, Moneypaper Advisor will make appropriate "buy, sell, hold" decisions as it believes they are needed using the Firm’s asset allocation methodology. Through the use of an asset allocation approach, the Firm provides Investment Management Services based on a personalized understanding of each client’s independent investment objectives.

The Firm’s Investment Management Services typically begin through the gathering of information vis-à-vis a new Investment Policy Statement, or other similar documentation process. Based upon this information, the Firm selects the appropriate allocation for the client’s assets.

The Firm employs a defined process for each step in the investment management cycle including goal setting and risk/return profiling, asset allocation modeling, investment selection and implementation, and ongoing monitoring and reporting. This approach helps to provide a robust process to provide long-term investment solutions.

Depending upon the strategy selected by the Firm and the client, Moneypaper Advisor may invest client assets in various sectors and securities, including but not limited to listed stocks only. Please refer to Item 8 for more information on Moneypaper Advisor’s investment strategies, methods of

analysis and their associated risks of loss.

As noted above, Moneypaper Advisor generally manages client assets on a fully discretionary basis. In exercising full discretionary authority, Moneypaper Advisor selects, without first obtaining client's permission, (1) the securities to be bought and sold; and (2) the amounts of securities to be transacted and whether it will be individually or block traded. Moneypaper Advisor's discretionary authority may be subject to conditions imposed by a client. This may occur when a client restricts or prohibits transactions in a security for a specific company or for an industry sector, or requests that the Firm place trades with a specific broker-dealer (aka "directed brokerage"). For more information on the Firm's discretionary authority and brokerage practices please refer to Items 12 and 16.

Clients are allowed to impose reasonable restrictions on the types of securities, sectors and/or industries they do not want to be included in their portfolio. Such restrictions must be communicated to the Firm in advance and documented in writing. Once this information is gathered initially, each client is responsible for informing Moneypaper Advisor in writing of any changes to these restrictions or to their overall investment objectives. The Firm does not assume any responsibility for the accuracy of the information provided directly by its clients or the failure of clients to inform the Firm of changes to their investment or financial objectives.

### **C. General Information About Moneypaper Advisor's Advisory Services**

#### **1. Advisory Agreements**

Prior to engaging Moneypaper Advisor to provide investment advisory services, the client will be required to enter into a written agreement ("Client Agreement") with the Firm setting forth the fees to be charged and the terms and conditions under which it will render its services.

Moneypaper Advisor will provide a Brochure and one or more Brochure Supplements to each client or prospective client prior to or contemporaneously with the execution of a Client Agreement. The advisory relationship will continue until terminated by the client or the Moneypaper Advisor in accordance with the provisions of the Client's Advisory Agreement.

### **D. Wrap-Fee Programs**

Moneypaper Advisor does not provide portfolio management services to any wrap fee programs, as that term is defined in the instructions to Form ADV Part 2.

### **E. Assets Under Management**

As of 12/31/2022, the following represents the amount of client assets under management by Moneypaper Advisor on a discretionary and non-discretionary basis:

Type of Account	Assets Under Management ("AUM")
Discretionary	<b>91,306,000</b>
Non-Discretionary	\$0
Total:	<b>91,306,000</b>

## ITEM 5: FEES AND COMPENSATION

### A. Advisory Fees

Prior to engaging Moneypaper Advisor to provide advisory services, the client will be required to enter into a written Client Advisory Agreement with the Firm setting forth the terms and conditions and the fees under which it will render its services. Fees may be subject to negotiation under certain circumstances as agreed on by the Firm and the client. The following schedule of fees outlines the typical fee structure under which Moneypaper Advisor renders its services. The actual schedule of fees, as it applies to a particular client, will be clearly outlined in the Client Agreement.

#### 1. Fees for Wealth Management Services

The fees for Wealth Management Services are detailed in Sections 2 and 3 below.

Moneypaper Advisor charges fees for Investment Management Services:

- a. **Percentage of Managed Assets:** Clients pay an annualized monthly advisory fee (“AUM Fee”) in advance based on fair market value of the assets under management (as reasonably determined in good faith by Moneypaper Advisor) as of the close of business on the last business day of the proceeding calendar quarter. The AUM Fee is calculated according to the below fee schedule:

Assets Under Management	Advisory Fee (% AUM)
	0.35%

### B. Billing Method

Fees are usually deducted from a designated client account or accounts to facilitate billing. The client must consent in advance to direct debiting of their investment account. Payment by check is also acceptable.

### C. Other Fees and Expenses

Clients should be aware that they will be responsible for all fees imposed by the custodian for trading and other related costs, which can include but not be limited to brokerage commissions, transaction costs, custodian fees, transfer fees, redemption fees on short –term investments, cashiering fees and/or taxes or penalties levied by governmental authorities. Other fees a client can incur include, but are not limited to, custodian fees, brokerage commissions, transaction fees, sub-advisor fees, cashiering fees and/or taxes/penalties levied by governmental authorities. **Moneypaper Advisor** does not receive any portion of these fees or expenses and seeks to negotiate and minimize these fees wherever possible. When managing clients’ assets, we take into consideration the overall costs to a client, and we strive to make transaction decisions that are the most economical for a client based on the then prevailing facts and circumstances. However, in some situations such as with unexpected cash needs or avoiding capital gain distributions, fees such as short-term redemption fees can be incurred. In these situations, Moneypaper Advisor will endeavor to only incur these fees when it is determined to be in the client’s best interest.

All fees paid to Moneypaper Advisor for its services are separate and distinct from the fees and expenses outlined above.

Importantly, all the fees charged to a client's account lowers the overall performance of the account. Therefore, clients should review all applicable direct and indirect fees charged, including but not limited to custodian fees, transaction fees, fees associated with investments (e.g., mutual funds and ETFs), and advisory fees to fully understand the total amount of fees to be paid by the client and to thereby evaluate the advisory services being provided.

#### **D. Termination of Services**

Clients who pay investment management advisory fees in advance will receive a refund for unearned fees upon termination. Either the client or Moneypaper Advisor may terminate the Firm's services without penalty at any time. The Firm determines the amount to be refunded to the client, if any, by subtracting its fees earned as of the time of termination from any amounts collected in advance as of the time of termination.

#### **E. No Compensation For Sale or Securities**

*Moneypaper Advisor does not accept compensation for the sale of securities or other investment products.*

### **ITEM 6: PERFORMANCE-BASED FEES AND SIDE-BY-SIDE MANAGEMENT**

Moneypaper Advisor does not charge performance-based fees (*i.e.*, fees calculated based on a share of capital gains upon or capital appreciation of the funds or any portion of the funds of an advisory client). Consequently, Moneypaper Advisor does not engage in side-by-side management of accounts that are charged a performance-based fee with accounts that are charged another type of fee (such as fees based on the client's assets under management). As described above, Moneypaper Advisor provides its services for a fee equal to 0.35% of AUM. in accordance with SEC Rule 205(a)(1).

### **ITEM 7: TYPES OF CLIENTS**

Moneypaper Advisor provides advisory services primarily to one client, MP63 Fund, Inc. symbol DRIPX. Moneypaper Advisor may accept other client upon its discretion.

### **ITEM 8: METHODS OF ANALYSIS, INVESTMENT STRATEGIES AND RISK OF LOSS**

#### **A. Methods of Analysis**

In formulating investment advice and managing assets, Moneypaper Advisor utilizes proprietary investment strategy and analyzes individual securities under a "down-top" investment analysis approach. This in turn guides the Firm's asset allocation decisions and the selection of investments suitable for particular investment portfolios. Client should be aware that investing in securities involves risk of loss that they should be prepared to bear.

## **B. Investment Strategies**

The primary investment strategy used to implement any investment advice given to clients is asset allocation. Based on the Firm's economic forecast and client-driven factors such as desired rate of return, aversion to risk, investment time horizon, tax consequences, and other constraints, investments are diversified across specific different asset classes.

## **C. Risk of Loss**

Investing in securities involves a significant risk of loss, and all investments have certain risks that are borne by the investor. Moneypaper Advisor's methods of analysis and investment strategies aim to keep the risk of loss in mind. Some of risks of loss a client should be aware of include, but are not limited, to the following:

1. Interest-Rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
2. Market Risk: The price of a stock, bond, mutual fund or other security may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances.
3. Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
4. Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
5. Political and Legislative Risks: Companies face a complex set of laws and circumstances in each country in which they operate. The political and legal environment can change rapidly and without warning, with significant impact, especially for companies operating outside of the United States.
6. Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
7. Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
8. Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
9. Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad.

## **ITEM 9: DISCIPLINARY INFORMATION**



Registered investment advisers such as Moneypaper Advisor are required to disclose all material facts regarding any legal or disciplinary event that would be material to a client's or prospective client's evaluation of the Firm or the integrity of its management. Moneypaper Advisor has not been subject to any such legal or disciplinary event, and thus far has no information to disclose with respect to this Item.

## **ITEM 10: OTHER FINANCIAL INDUSTRY ACTIVITIES AND AFFILIATIONS**

Neither Moneypaper Advisor, nor any member of its management is registered as a securities broker-dealer, or a futures commission merchant, commodity pool operator or commodity trading advisor.

The Firm does not have any affiliation with any related person who is a broker-dealer, investment company, other investment advisor, financial planning firm, commodity pool operator, commodity trading adviser or futures commission merchant, banking or thrift institution, accounting firm, law firm, insurance company or agency, pension consultant, real estate broker or dealer, or an entity that creates or packages limited partnerships.

Moneypaper Advisor does not receive compensation directly or indirectly from other advisers that creates a material conflict of interest, nor does it have other business relationships with advisers that would create a material conflict of interest.

## **ITEM 11: CODE OF ETHICS, PARTICIPATION OR INTEREST IN CLIENT TRANSACTIONS AND PERSONAL TRADING**

### **A. Code of Ethics Summary**

The principals and staff of Moneypaper Advisor have adopted a Code of Ethics for the purpose of instructing its personnel in their ethical obligations and to provide rules for their personal securities transactions. The Firm owes a duty of loyalty, fairness and good faith towards its clients, and the obligation to adhere not only to the specific provisions of the Code but to the general principles that guide the Code. The Code of Ethics covers a range of topics that may include: general ethical principles, receipt and giving of gifts, reporting personal securities trading, exceptions to reporting securities trading, reportable securities, initial public offerings and private placements, reporting ethical violations, distribution of the Code of Ethics, review and enforcement processes, amendments to Form ADV and supervisory procedures. We will provide a copy of the Code of Ethics to any client or prospective client upon request.

### **B. Participation or Interest in Client Transactions and Personal Trading**

It is Moneypaper Advisor's policy not to enter into any principal transactions or agency cross transactions on behalf of client accounts. Principal transactions occur where an adviser, acting as principal for its own account, buys securities from or sells securities to an advisory client.

Agency cross transactions occur where a person acts as an investment adviser in relation to a transaction in which the adviser, or an affiliate of the adviser, acts as broker for both the advisory client and for another person on the other side of the transaction.

Neither Moneypaper Advisor nor any of its employees act as general partner in a partnership in which clients are solicited to invest or as an investment adviser to a mutual fund or other investment company that is recommended to clients. Based upon a client's stated objectives, Moneypaper Advisor may, under certain circumstances, recommend the purchase or sale of securities in which the Firm or its affiliates have an interest. Such recommendations will only be made to the extent that they are reasonably believed to be in the best interests of the client.

Additionally, as part of Moneypaper Advisor's fiduciary duty to clients, the Firm and its associated persons will endeavor at all times to put the interests of the clients first, and at all times are required to adhere to the Firm's Code of Ethics.

The Firm's principals and staff may have positions in securities that we also recommend to clients. Moneypaper Advisor's recommendations to clients may differ from client to client, based on each client's unique circumstances. The Firm may also recommend purchase of a security for one client while recommending the sale of that security for another. However, as a fiduciary Moneypaper Advisor aims to act for the benefit of clients and place clients' interests before its own. Client transactions have priority over transactions in securities and other investments of which our principals and staff may own. Principals and staff may participate with clients in block trades. Principals and staff must adhere to the Firm's Personal Trading Policy at all times.

To help mitigate any real or potential conflicts of interest associated with these practices, the *Chief Compliance Officer of Moneypaper Advisor reviews employee trades involving reportable securities each quarter and holding reports annually.* The personal trading reviews help ensure that the personal trading of employees does not affect the markets, and that clients of the Firm receive preferential treatment. Since most employee trades are small, listed securities transactions, these transactions generally do not affect the securities markets. It should be noted, that under the Firm's Code of Ethics employees of the Firm are not required to report transactions involving open-ended mutual funds to the Firm's Chief Compliance Officer and some employees may hold outside brokerage accounts consisting of non-reportable securities, which consequently are not subject to the Chief Compliance Officer's quarterly transactions review.

### **Timing of Trade Orders**

All trades for clients are submitted through the centralized trading process managed by the CEO of the Moneypaper Advisor, in which all orders are submitted and executed at the market or limit price.

## **ITEM 12: BROKERAGE PRACTICES**

### **A. Selection Criteria**

The Firm's CEO and CCO are jointly as a committee, responsible for identifying and approving broker-dealers to use in executing trades for client accounts. This committee considers various factors in selecting a broker, including:

- Financial Condition;
- Acceptable record keeping;

- Ability to obtain best price;
- Knowledge of market, securities and industries;
- Commission structure; and
- Reputation and integrity.

The CCO is responsible for periodically conducting a formal review of the Firm's custodial relationships.

#### **B. Research and Other Soft Dollar Benefits**

The Firm does **not** have any arrangements to receive soft dollar benefits in connection with client securities transactions.

#### **C. Brokerage for Client Referrals**

Moneypaper Advisor does not have any arrangements to receive client referrals from any broker-dealer or third party. Additionally, and as explained more fully in Item 14 below, Moneypaper Advisor does not give or receive economic benefits for referring or referred clients.

#### **D. Directed Brokerage**

The Firm does not require clients to execute transactions through a specified broker-dealer.

#### **E. Aggregation of Orders**

Moneypaper Advisor does not aggregate ("block trade") sale and purchase orders with other client accounts because it only manages one account for MP63 Fund, its only client.

### **ITEM 13: REVIEW OF ACCOUNTS**

#### **A. Review of Accounts and Reviewers**

The Firm's managed account is reviewed on periodic basis, with regard to the overall asset allocation of the portfolio and in light of the client's Investment Policy Statement. Reviews are conducted by Moneypaper Advisor's designated access persons.

#### **B. Review Triggers**

The Firm's managed accounts are reviewed with regard to the overall asset allocation of the portfolio and in light of the client's Investment Policy Statement. Triggers for investment reviews include:

- Deposits or withdrawals
- Changes in the Firm's investments as determined by the investment committee
- Changes in the client's situation or in the client's objectives
- Re-balancing of accounts.

#### **C. Regular Reports**

Moneypaper Advisor typically sends written semi-annual and annual reports to its Investment

Management Services client(s). The reports include Investment Portfolio Holdings Summaries and Performance Reports.

#### **ITEM 14: CLIENT REFERRALS AND OTHER COMPENSATION**

In general, it is our policy that we do not pay referral fees to independent persons or firms ("Solicitors") for introducing clients to us. However, it is possible that in the future the Firm may enter into a referral arrangement.

If we pay a referral fee, we require the Solicitor to provide the prospective client with a copy of this document (our Firm Disclosure Brochure) and a separate disclosure statement that includes the following information:

- the Solicitor's name and relationship with our Firm;
- the fact that the Solicitor is being paid a referral fee;
- the amount of the fee; and
- whether the fee paid to us by the client will be increased above our normal fees in order to compensate the Solicitor.

As a matter of Firm practice, the advisory fees paid to us by clients referred by solicitors are not increased as a result of any referral relationship. It is Moneypaper Advisor's policy not to accept or allow our related persons to accept any form of compensation, including cash, sales awards or other prizes, from a non-client in conjunction with the advisory services we provide to our clients.

#### **ITEM 15: CUSTODY**

Pursuant to Rule 206(4)-2 of the Advisers Act, because the Firm has the authority and ability to debit its fees directly from clients' accounts, Moneypaper Advisor is deemed to have **"constructive custody"** of accounts in which advisory fees are deducted. Our policy is to not have custody of client assets beyond the "constructive custody" arising from debiting fees or accepting a third-party SLOA that meets all the conditions in SEC No-Action Letter 2/21/17.

To mitigate any potential conflicts of interests, all client assets are maintained with an independent qualified custodian. Furthermore, clients will receive statements on at least a quarterly basis directly from the qualified custodian that holds and maintains their assets. Clients are urged to carefully review all custodial statements. We do not accept any "Standing authorization" from clients to disburse funds to third parties.

#### **ITEM 16: INVESTMENT DISCRETION**

##### **A. Discretionary Authority: Limitations**

Unless otherwise agreed upon at the inception of the client relationship and memorialized in writing, most Investment Management Services rendered by Moneypaper Advisor are done on a discretionary basis. In exercising its discretionary authority, Moneypaper Advisor has the ability to determine the type and amount of securities to be transacted. Such discretion is to be exercised in a manner consistent with each client's stated investment objectives, risk tolerance, and time

horizon, as outlined in the client's Investment Policy Statement.

In addition, Moneypaper Advisor's authority to trade securities may be limited in certain circumstances by applicable legal and regulatory requirements. Clients are permitted to impose reasonable limitations on Moneypaper Advisor's discretionary authority, including restrictions on investing in certain securities or types of securities. All such limitations, restrictions, and investment guidelines must be communicated to Moneypaper Advisor in writing.

### **Limited Power of Attorney**

By signing Moneypaper Advisor's Client Advisory Services Agreement, client(s) authorize Moneypaper Advisor to exercise discretionary authority with respect to all Investment Management Service transactions involving the client's account. Pursuant to such agreement, Moneypaper Advisor is designated as the client's attorney-in-fact with discretionary authority to effect investment transactions in the client's account. This limited power of attorney authorizes the Firm to give instructions to third parties for servicing client's account.

### **ITEM 17: VOTING CLIENT SECURITIES**

Moneypaper Advisor's policy and practice is to vote proxies on behalf of its client(s) and generally in line with propositions as promulgated by the respective company's management.

### **ITEM 18: FINANCIAL INFORMATION**

Moneypaper Advisor does not have any financial commitments that may impair its ability to meet contractual and/or fiduciary obligations to clients. Finally, the Firm has not been the subject of a bankruptcy proceeding.