

# **Moneypaper Advisor, Inc.**

## **Business Continuity & Disaster Recovery Plan**

Updated March 25, 2025

Vita Nelson, President of Moneypaper Advisor, Inc. (the “Firm”), is responsible for the creation of this document and Byron Perez, Chief Compliance Officer (“CCO”), is responsible for keeping it up to date.

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#### **Annual Testing:**

An annual test of the disaster recovery plan will be conducted and documented by the CCO. The disaster recovery plan will additionally be reviewed and updated periodically on an interim basis by the advisor’s Chief Executive Officer, which is its President, Vita Nelson.

**Action Plan:**

In event of daytime disaster or evening disaster, the CCO will send out a group text and e-mail and, if necessary, will call employees and tell them to report to the alternative location described in this document.

If a disaster occurs during business hours, employees will be informed by the President or by the CCO. They will do their best to ensure all employees have exited the building before leaving him/herself. Employees are instructed to exit the building and await further instructions from the portfolio managers or from emergency services.

The President is responsible for coordinating with local emergency services. The CCO will conduct annual evacuation drills, can be in conjunction with an annual compliance meeting exercises. During the drills, the President or her appointed replacement (or the CCO) will describe the overall evacuation procedures as well as their coordination with emergency services and provisions for evacuation of anyone who might be disabled at the time of the disaster.

**Emergency contact information the following:**

Call 911

Vita Nelson: 914-419-2154, [vitajnelson@moneypaper.com](mailto:vitajnelson@moneypaper.com),

Lee Nelson: 310-710-9799, [ln@ema.la](mailto:ln@ema.la), [lee@moneypaper.com](mailto:lee@moneypaper.com)

Byron Perez: 914-565-0187, [byronperez@moneypaper.com](mailto:byronperez@moneypaper.com), [bperez1020@gmail.com](mailto:bperez1020@gmail.com)

Clifford Nelson: 914-310-1880, [Clifford.s.nelson@live.com](mailto:Clifford.s.nelson@live.com)

Information is updated when changes occur and the BCP shall be reviewed by the President and the CCO not less frequently than once annually.

**Firm Policy**

The Firm recognizes that it cannot be responsible for emergencies caused by widescale disruptions. In case of an emergency that disrupts the Firm’s operations, the initial concerns will be safeguarding lives and property and quickly re-establishing the Firm’s operations at an alternative location where it can continue the business of the Firm’s only client, the MP 63 Fund, Inc. (the “Fund”). In the event that the Firm is unable to continue operations, it will alert MSS to the disaster and provide information to share with Fund shareholders as to when it expects to be able to perform. This BCP includes the contact information for every service provider that the Firm relies upon in its service to its client.

**The plan anticipates the following risks of business interruption as a result of natural or inflicted disasters, a cybersecurity attack, or a key employee incapacitation:**

**A) Inability to trade due to system unavailability.**

Trading terminals that duplicate the workstation of the Apple computer owned by the Firm were tested on a virtual workstation to confirm that trading could commence in case of an event. Part of the changes introduced in 2022 include providing testing of access to the Interactive Brokers trading platform as issued to the Firm and for use to deal in securities for the Fund. Access and trading

software connectivity was tested for accuracy as of 12-28-2023 during the annual compliance meeting.

Backups of everything on the computers are saved on two hard drives and they are backed up daily. One backup is taken home by the CCO. These copies were successfully tested as part of the 2023 annual test of the Disaster Recovery Plan. Systems restored were all tested for MS Office applications, Advent AXYS, and Trading Systems. The Interactive Brokers host the trading platform we use. Support phone number is 203-618-4060.

Telephones and computers with installation cables are maintained in an alternative location described below in this document. In addition, In the event that systems are compromised, we have tested forwarding of our main number and individual extensions to employee cell phones. Forwarding of calls was tested in January 12, 2024.

**B) Incapacity of a portfolio manager who is involved in investment decision-making and/or the oversight of the Advisor’s administrative responsibilities**

In the event of the incapacity of any portfolio manager, the remaining portfolio managers will take on some of the responsibilities of the incapacitated portfolio manager and Lee Nelson will assume a leadership position. Lee Nelson is the son of the primary portfolio manager, Vita Nelson. Mr. Nelson is also familiar with compliance rules and regulations having successfully completed The Investment Advisor Core Compliance Program co-sponsored by National Regulatory Services and the Investment Adviser Association. He understands the Advisor’s investing strategy as well as the material used to implement that strategy. Since 2017, he has been involved in the formation of the investment strategies that are followed by the Firm and is a participant in portfolio management meetings.

Mr. Nelson’s participation would provide continuity, thus enhancing the Firm’s ability to produce the strong performance results that many of the Fund shareholders have enjoyed since the Fund’s inception in 1999. With his involvement, shareholders will be able to take comfort that the Fund’s historic investment approach and dedication to shareholder value will continue. The Firm’s investment strategies and templates of the unique spreadsheets used to inform investing decisions are maintained in hard copies as well as on files that are backed up nightly onto external hard drives and forwarded to Mr. Nelson before they are removed from the premises.

**The Location of this Business Continuity Plan**

The Plan is presented at the Fund Website at this location ([www.MP63fund.com/BCP.pdf](http://www.MP63fund.com/BCP.pdf))

Each employee has two copies of this plan, each held at a separate location. The plan is also accessible online at the MP 63 Website at location MP63Fund.com/BCP. Any changes to the plan would be updated at this site and an updated plan would be distributed to employees. Each employee keeps a copy of the BCP on his/her own computer desktop in a folder labeled MP63Fundcompliance.

**Office Locations**

**Advisor’s Primary Office Location**

111 Pleasant Ridge Road, Harrison, New York, 10528,  
914-925-0022, 800-388-9993

**Alternative Physical Location**

215 East 79th Street, New York NY, Apartment 5E

The Firm has no alternative telephone number(s) as the Adviser has established a new telephone service so that the same telephone numbers will ring at the alternative site as at the primary location: The primary telephone number is 914-925-0022. To prepare for such emergency use, the Firm has established WIFI communications in order to have what it needs in order to continue to operate with continuous phone service, continuous access to its records, and continuous access to the service providers upon whom it depends.

### **Customer Access to Funds and Securities**

The Adviser does not maintain custody of customers' funds or securities. In the event of an emergency, there would be prominent notice of the disaster at the Fund's Website, which would explain to shareholders of the Fund that their Fund assets are safely in the custody of the US Bank and that their account records remain safely in the books and records of the Fund's transfer agent, Mutual Shareholder Services (MSS).

### **Service Providers to the Fund**

#### **1. Mutual Shareholder Services (MSS): Fund Administrator, Transfer Agency and Accounting Services.**

8000 Town Centre Drive, Suite 400, Broadview Heights, OH 44147  
(440) 922-0066

#### **Key Personnel and their duties and contact information**

Gregg Getts- MSS President [ggetts@mutualss.com](mailto:ggetts@mutualss.com) 440-922-0066 Ext. 101

Jessica Flanders- MSS Trade Support [jflanders@mutualss.com](mailto:jflanders@mutualss.com) Ext. 112

Lynda Snyder- MSS report submission [lsnyder@mutualss.com](mailto:lsnyder@mutualss.com) Ext. 115

Melanie Kaniewski- MSS Prospectus & SAI Filing [mkaniewski@mutualss.com](mailto:mkaniewski@mutualss.com)

Brandon Pokersnik- MSS in-house legal counsel and fund accountant [bpokersnik@mutualss.com](mailto:bpokersnik@mutualss.com)  
Ext. 109

Steven Milcinovic- Arbor Capital Fund Distribution [steven@arborcourtcapital.com](mailto:steven@arborcourtcapital.com) Ext. 123

Abbey Donato- MSS Fund Accountant and deals with Board Book [adontato@mutualss.com](mailto:adontato@mutualss.com) Ext. 108

#### **2. Interactive Brokers (IB): Buy & Sell Executions**

Frank Magnani- [fmagnani@interactivebrokers.com](mailto:fmagnani@interactivebrokers.com) 203-422-8939

[primeserve@interactivebrokers.com](mailto:primeserve@interactivebrokers.com) 203-618-4060

[prime@interactivebrokers.com](mailto:prime@interactivebrokers.com)

#### **3. The Huntington National Bank- Custodian Bank Acct: 1041026245**

##### **Key Personnel and their duties and contact information**

Kelli Hermen- The Huntington National Bank Vice President/Trust Officer

[Kelli.Hermen@huntington.com](mailto:Kelli.Hermen@huntington.com) 614-331-5597

Abass Jalloh- The Huntington National Bank Client Service Specialist, Trade Services

[abass.jalloh@huntington.com](mailto:abass.jalloh@huntington.com) 614-331-9967

##### **Contact information for trade execution (send trade info to)**

Post-Execution Trade Instructions [mutualfund.custody@huntington.com](mailto:mutualfund.custody@huntington.com)

Post-Execution Inquiry [trusttradingarea@huntington.com](mailto:trusttradingarea@huntington.com)

Pre-Execution Trade Instructions [mutual.fund.trading@huntington.com](mailto:mutual.fund.trading@huntington.com)

#### **4. Advisors Portfolio Managers**

Vita Nelson [vitajnelson@moneypaper.com](mailto:vitajnelson@moneypaper.com) 914-419-2154

Mario Medina [jmario7@gmail.com](mailto:jmario7@gmail.com) [mario@moneypaper.com](mailto:mario@moneypaper.com) 786-619-5993

Lee Nelson 310-710-9799 [ln@ema.la](mailto:ln@ema.la) [Lee@moneypaper.com](mailto:Lee@moneypaper.com)

#### **Data Back-Up and Recovery (Hard Copy and Electronic)**

The Firm maintains its records in hard copy format and on local computers on premises at its main office, which are backed up daily and removed from the premises. The Firm records are also stored in a desktop file on the laptop of the Firm's CEO and the CCO, as well as the hard drives.

Original documents are maintained in metal cabinets in a separate structure at the office location.

In the event of an internal or external Significant Business Disruption ("SBD") that causes the loss of our paper records, they can be physically recovered from our back-up remote hard drives maintained by the CCO and other personnel at an alternative location and away from the main office. If our primary location is inoperable, we continue to operate from our alternative location mentioned above. For the loss of records, we recover from back-ups.

### **I. Financial Assessments**

#### **A. Financial and Credit Risk**

In the event of an SBD, the Firm will determine the value and liquidity of the Fund's investments and other assets to evaluate its ability to continue to fund operations and remain operational. If the Firm determines that it is unable to meet its obligations or otherwise continue to fund operations, it will request additional financing from its bank or other credit sources to fulfill the obligations. If it cannot remedy a capital deficiency, it will file appropriate notices with regulators and immediately take the appropriate steps required.

### **II. Mission Critical Systems**

Our Firm's "mission critical systems" are those that ensure prompt ability to transact buys and sells of Fund assets. The Firm's responsibility to provide investment management for Fund shareholders can continue in the event of an SBD by relying on our laptop computers, our mobile telephones, and our phones, which are available at our alternative location.

#### **1. Portfolio Transactions Order Processing**

Currently, the Firm makes all the investment decisions for the MP63 Fund under the discretionary investment management contract the Firm maintains with the Fund. During any emergency situation, the Firm will continue to make investment transactions by accessing its brokers through its computers and/or telephones. Critical software to carry on the business of portfolio management is lodged on computers: that of Vita Nelson, Byron Perez, and Lee Nelson.

There will be no interruption in the Firm's ability to communicate with its client, service providers, and other of its mission critical systems from the Firm's alternative physical location.

## **2. Investment Recommendation Order Entry**

The Firm enters orders through a designated trader with its executing stockbroker. The Firm has accounts with one broker. The broker that the Firm uses for trade executions, Interactive Brokers, indicated that the Firm could expect continued service as long as its executing systems are functional. In the event that their services are affected, the Firm would seek the services of the alternative broker with which it has an account to safeguard against such an emergency.

## **3. Order Execution**

The Firm currently executes orders by using the internet to gain access to its executing broker and entering the conditions (price and number of shares) under which it will buy or sell. The broker routes the order to the marketplace where his system finds the best executing price, If the Firm's conditions cannot be met in the market, the transaction will not be executed. The executing broker for the past year, Interactive Brokers, can be accessed through the Firm's laptop and office computers. In the event of an internal SBD, we would execute orders through the internet with our executing broker from our alternative physical location.

## **4. Mission Critical Systems Provided by Our Clearing Firm**

The Adviser clears portfolio trades through its custodian bank, which is US Bank. The Adviser submits a copy of all trade executions to US Bank on behalf of the Fund via email.

### **III. Alternate Communications between the Adviser and Shareholders, Employees, and Regulators**

#### **A. Shareholders**

We now communicate with Fund shareholders who call the Firm using the telephone or e-mail, which will remain available at the alternative location. In the event of an SBD, in which case we would receive mail delivery at the alternative location, a member of the Firm's personnel will retrieve mail from the Post Office box where the Firm receives mail and from the post office that serves the primary location.

#### **B. Personnel**

We now communicate with our personnel using the telephone, e-mail, and in person. These practices will continue in event of an SBD.

We also employ a call tree so that senior management can reach all employees and critical systems quickly during an SBD. The call tree includes all staff home and office phone numbers. The manager has all employee phone numbers at his home. The CCO is responsible for the call tree (Byron Perez-914-565-0187). The CCO retains a list of those he is responsible to contact.

#### **C. Regulators**

The Firm is registered with SEC and is listed on IARD with FINRA. We communicate with our regulators using the telephone, a secure SEC website for e-mail, fax, U.S. mail, and in person. In the event of an SBD, we will assess which means of communication are still available to us, and use

the most efficient means of communication.

#### **IV. Critical Business Constituents, Banks, and Counter-Parties**

##### **Business constituents**

We have contacted our critical business constituents and determined the extent to which we can continue our business relationship with them in light of the internal or external SBD. We will quickly establish alternative arrangements if a business constituent can no longer provide the needed goods or services when we need them because of an SBD to them or the Firm. Our major suppliers are Con Edison and Optimum.

##### **Banks**

We do not maintain any Proprietary Accounts. The bank maintaining our operating account is J P Morgan Chase, 302 Halstead Avenue, Harrison, NY 10528, 914-777-0140. Erik Vietz- Branch Manager [erik.m.vietz@chase.com](mailto:erik.m.vietz@chase.com) 914-835-1507.

##### **Regulatory Reporting**

Our Firm is subject to regulation by the SEC and FINRA. We now file reports with our regulators using paper copies in the U.S. mail, and electronically using fax, e-mail, and the Internet. In the event of an SBD, we will check with the SEC, FINRA, and any other applicable regulators to determine which means of filing are still available to us, and use the means closest in speed and form (written or oral) to our previous filing method. In the event that we cannot contact our regulators, we will continue to file required reports using the communication means available to us. FINRA, 200 Liberty Street, 10th Floor, New York, NY 10005.

##### **Disclosure of Business Continuity Plan**

The Firm does not have a dedicated website; however, this plan can be accessed at the Fund's website [WWW.MP63FUND.COM](http://WWW.MP63FUND.COM). Upon request, we provide a BCP disclosure statement to customers and mail it to customers as a print-out.

##### **Updates and Annual Review**

Our Firm will update this plan whenever we have a material change to our operations, structure, business, or location. In addition, our Firm will review this BCP annually, to modify it for any changes in our operations, structure, business, or location. The plan will be tested at least once annually.

##### **Senior Manager Approval**

I have approved this Business Continuity Plan as reasonably designed to enable our Firm to meet its obligations to the Fund in the event of an SBD.

Signed: *Vita Nelson*

Title: CEO

Date: 5/25/25