

# Brochure

Form ADV Part 2A

## **Monetary Management Group, Inc.**

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St. Louis, MO 63021

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July 17, 2023

This Brochure provides information about the qualifications and business practices of Monetary Management Group, Inc. If you have any questions about the contents of this Brochure, please contact us at 314-909-0646. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Monetary Management Group, Inc. also is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov). The searchable IARD/CRD number for Monetary Management Group, Inc. is 110284. The SEC's web site also provides information about any persons affiliated with Monetary Management Group, Inc. who are registered, or are required to be registered, as investment adviser representatives of Monetary Management Group, Inc.

Monetary Management Group, Inc. is a Registered Investment Adviser. Registration of an Investment Adviser does not imply any level of skill or training.

## **Item 2 – Material Changes**

This Item will be used to provide our clients with a summary of new and/or updated information. We will inform you of the revision(s) based on the nature of the updated information. We will ensure that you receive a summary of any material changes to this and subsequent Brochures within 120 days of the close of our business' fiscal year. We will provide you with other interim disclosures about material changes as necessary.

### **Material Changes:**

The firm has no material changes to report since the last ADV annual update amendment dated July 22, 2022.

### **Full Brochure Available:**

Currently, our Brochure may be requested, free of charge, by contacting Thomas G. Wright, Jr., President and Chief Compliance Officer, at 314-909-0646 or via email at: [twrightjr@monetarymanagementgroup.com](mailto:twrightjr@monetarymanagementgroup.com).

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#### **Item 4 – Advisory Business**

Monetary Management Group, Inc. (“Monetary Management”, “We” or the “Firm”) is in St. Louis, Missouri. The firm has been providing investment management services to clients since 1983. The principal owner is Thomas G. Wright, Sr. In addition, Thomas G. Wright Jr., Lisa Brunts, Kathleen Gorman, and Elizabeth Wright-Gajda all have ownership in the firm.

Monetary Management provides investment advisory services to individuals and families that includes continuous advice and management over the investment of their money consistent with the objectives of each client. Monetary Management also provides investment advisory services to companies, profit sharing plans, Taft-Hartley plans, and 401k plans.

When we provide investment advice to you regarding your retirement plan account or individual retirement account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act and/or the Internal Revenue Code, as applicable, which are laws governing retirement accounts. The way we make money creates some conflicts with your interests, so we operate under a special rule that requires us to act in your best interest and not put our interest ahead of yours.

We provide discretionary investment advisory services to most of our clients through a managed “wrap” account program (“Discretionary Wrap Program”). Through the Discretionary Wrap Program, we manage the investment and reinvestment of the clients’ portfolio assets on a discretionary basis and provide such investment advisory services on a “wrap” fee basis. Meaning, MMG charges a comprehensive single fee (i.e., all-inclusive fee covers costs of commissions, research, etc.). MMG manages a small number of clients’ accounts on a non-wrap basis whereby these clients pay a transaction charge of up to \$50 to cover clearing charges for the trades occurring in their account(s).

With all clients, we tailor our services to meet the needs of the individual clients and seek to ensure, on a continuous basis, that client portfolios are managed in a manner that is consistent with those needs and objectives. We consult with clients on an initial and ongoing basis to assess their specific risk tolerance, time horizon, liquidity constraints and other related factors relevant to the management of their portfolios

#### **Discretionary Investment Management Accounts**

Monetary Management usually receives discretionary authority from the client at the outset of an advisory relationship to select the identity and amount of securities to be bought or sold, commission rates to be determined and broker dealer to be used. In all cases, however, such discretion is exercised in a manner consistent with the stated investment objectives for the particular client account. We maintain a Limited Power of Attorney for all discretionary accounts for directing and or effecting investments on behalf of the managed account, and for the direct payment of our fees, custodial fees and or other charges incurred by your managed account.

Information is gathered by each adviser about their client's financial circumstances, which include investment objectives, risk tolerance, and investment time horizon (collectively "financial information"), and any reasonable restrictions that the client wishes to impose on the management of the account. Based on the information provided the adviser makes a determination of the securities that would best suit the needs of the client.

When selecting securities and determining amounts, Monetary Management Group, Inc. observes the limitations and restrictions of the clients for which it advises. As a result, reasonable restrictions may be placed on the management of the account by the client if they do not cause us to deviate from the investment decisions we otherwise believe to be necessary.

Clients are responsible for notifying the Firm promptly, in writing, of any changes to the information provided to us and for providing the Firm with additional information as we may request from time to time to assist us in providing services.

### **Non-Discretionary Investment Management Accounts**

With non-discretionary accounts, the client maintains complete and total discretion in the investment of the assets in the account. Client will authorize Monetary Management to execute trades for the accounts, in accordance with the prior approval of Client.

### **Termination of an Agreement**

Agreements may be terminated at any time upon 30 days written notice by either party to the other. Fees will be pro-rated through the date of termination.

### **Investment Products**

We offer several investment strategies to clients and in doing so may invest in a wide range of securities and other financial instruments including:

- Equity securities
- Exchange-listed securities
- Over-the-counter securities
- Corporate debt
- Certificates of deposit
- United States government securities
- Municipal securities
- Mutual fund shares

As financial markets and products evolve, we may invest in other instruments or securities, whether currently existing or developed in the future, at our sole discretion.

### **Assets Under Management**

As of April 30, 2023, the firm managed \$438,763,045 in discretionary assets and \$16,314,110 in non-discretionary assets.

## **Item 5 – Fees and Compensation**

Monetary Management annual fee is calculated, quarterly, per account and is based on the average amount of assets under management during said quarter. The Fees are payable quarterly, in arrears.

The fee schedule range is as follows

- Equities 1.0% - 2.0% per annum
- Fixed .50% - 1.0% per annum

Minimum fee: \$2,500 annually. Accounts can be combined for purposes of determining the minimum fee. All fees are subject to negotiation based on such factors as the size and asset mix of account.

### **Additional Fees and Expenses**

Advisory fees payable to us do not include all the fees you may pay when we purchase or sell securities for your Account(s). You may pay custodial fees, transaction fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus. Some clients may be charged a transaction fee for trades occurring in their account. Clients with individual retirement accounts (IRA) will incur a \$50 annual charge by the account's custodian that is in addition to Monetary Management's advisory fee.

### **Fee Payment Options**

As indicated in our advisory agreement with you, there are two options you may select to pay for our services:

- Direct debiting (preferred): at the inception of the relationship and each quarter thereafter, we will notify your custodian of the amount of the fee due and payable to us through our fee schedule and contract. They will "deduct" the fee from your Account(s) or, if you have more than one account from the account you have designated to pay our advisory fees.

No less than quarterly, you will receive a statement directly from your custodian showing all transactions, positions and debits into or from your account; including the advisory fee paid by you to us. Every quarter, we will send you a billing invoice for the fee deducted and the amount of the assets the fee was based on. We urge you to verify the information in our report with the custodian's statement. The custodian does not validate or check our fee, its calculation on the assets on which the fee is based.

- Pay-by-check: At the inception of the Account and each quarter thereafter, we issue you an invoice for our services and you pay us by check or wire transfer within 15 days of the date of the invoice.

## **Item 6 – Performance Based Fees**

We do not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a client).

## **Item 7 – Types of Clients**

### **Account Requirements**

Our minimum account size is typically \$500,000.00. The account size is negotiable and we reserve the right to accept lesser amounts due to client relationship.

### **Types of Clients**

We provide our services to a number of Clients:

- Individuals, including high net worth individuals;
- Trusts, estates and charitable organizations;
- Pension and profit sharing plans; and
- Taft Hartley plans.

## **Item 8 – Methods of Analysis, Investment Strategies and Risk of Loss**

### **Analysis Methods**

Our security analysis methods include fundamental analysis, technical analysis, and cyclical analysis.

### **Sources of Information**

In conducting security analysis, Monetary Management's advisers utilize a broad spectrum of information, including financial publications, third-party research materials, annual reports, prospectuses, regulatory filings, company press releases, corporate rating services, and meetings with management of various companies.

### **Investment Strategies**

Advisers employ a range of investment strategies to implement the advice they give to clients. Each adviser employs their own investment strategy to their clients' accounts. It is possible that the firm and the advisers themselves may manage accounts of clients whose investment objectives are substantially different from one another. As a result, it is possible that it would be appropriate for us to sell a security “short” from one account while holding it “long” in another account. In general, our positions with regard to any security will be net long.

### **Risk of Loss**

All investments in securities include a risk of loss of your principal (invested amount) and any profits that have not been realized (the securities were not sold to “lock in” the profit). Stock markets, bond markets fluctuate substantially over time. Performance of any investment is not guaranteed. As a result, there is a risk of loss of the assets we manage that may be out of our

control. We cannot guarantee any level of performance or that you will not experience a loss of your account assets. Investing in securities involves risk of loss that all clients should be prepared to bear.

### **Item 9 – Disciplinary Information**

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Monetary Management. The firm nor its investment adviser representatives have any events to disclose that are applicable to this item.

### **Item 10 – Other Financial Industry Activities and Affiliations**

Monetary Management has an investment adviser representative who is also a registered representative with Moloney Securities Co., Inc. an unaffiliated broker dealer registered with the SEC and various state jurisdictions, and a member firm of Financial Industry Regulatory Authority (FINRA). Tom Wright, Jr., may receive commission as a registered representative with Moloney Securities and advisory fees as an investment adviser representative with Monetary Management Group; however, he does not receive both commissions and advisory fees in the same client account and consistent with his fiduciary duty he makes recommendations in the best interest of the client.

Tom Wright, Jr., is also a licensed insurance agent in his individual capacity. In this capacity he may receive compensation from the sale of insurance products or services. From time to time, he may recommend products and/or services to a client whereby they could receive compensation from the sale of the insurance product in addition to the client's advisory fee. This presents a conflict of interest because it gives him an incentive to recommend products and services based on the compensation and/or fee amount received. This conflict is mitigated by the fact that he has a fiduciary responsibility to place the interest of the client first and clients are free to not purchase any products or services, or to purchase any products or services through another licensed insurance agent.

### **Item 11 – Code of Ethics**

We have adopted a Code of Ethics for all supervised persons of the firm describing its high standard of business conduct, and fiduciary duty to its clients. The Code of Ethics includes provisions relating to the confidentiality of client information, a prohibition on insider trading, restrictions on the acceptance of significant gifts and the reporting of certain gifts and business entertainment items, and personal securities trading procedures, among other things. All supervised persons at Monetary Management. must acknowledge the terms of the Code of Ethics annually, or as amended.



We anticipate that, in appropriate circumstances, consistent with clients' investment objectives, advisers of Monetary Management Group, Inc. will recommend to investment advisory clients or prospective clients, the purchase or sale of securities in which they or others of Monetary Management, Inc and/or clients, also have a position of interest in. Our employees and persons are required to follow Monetary Management Code of Ethics that provides no security may be bought or sold by a principal or employee of Monetary Management before the firm's clients accounts have had the opportunity to make such transactions as appropriate. As a general rule, Monetary Management deals in very liquid securities and the size of transactions, in both share and dollar amounts is not large enough to move the price of individual securities. Therefore, front running, trading in front of clients is not a major concern. However, if Monetary Management employees trade in the same security on the same day as its clients, clients will always receive the better price.

Subject to satisfying the firm's Code of Ethics and applicable laws, officers, directors and employees of Monetary Management Group, Inc. and its affiliates may trade for their own accounts in securities which are recommended to and/or purchased for Monetary Management Group, Inc.'s clients. The Code of Ethics is designed to assure that the personal securities transactions, activities and interests of our employees will not interfere with (i) making decisions in the best interest of advisory clients and (ii) implementing such decisions while, at the same time, allowing employees to invest for their own accounts. Under the Code certain classes of securities have been designated as exempt transactions, based upon a determination that these would materially not interfere with the best interest of Monetary Management Group, Inc.'s clients.

### **Personal Trading**

Employee trading is monitored under the Code of Ethics, and to reasonably prevent conflicts of interest between Monetary Management and its clients. The Supervisory Procedures require that all trades made by employees or related persons of Monetary Management, who make recommendations or participate in the determination of which recommendation shall be made, will be reviewed by the designated person responsible. Monetary Management will also maintain quarterly reports on all personal securities transactions, except transactions in exempt securities/transactions. Further, such Supervisory Procedures impose certain policies and procedures concerning the misuse of material non-public information that are designed to prevent insider trading by any officer, partner, or associated person of Monetary Management.

### **Prohibition on Use of Insider Information**

We have also adopted policies and procedures to prevent the misuse of "insider" information (material, non-public information). You may request a complete copy of our Code by contacting us at the address, telephone or email on the cover page of this Part 2.

## **Item 12 – Brokerage Practices**

### **Research Services/Soft Dollars**

Monetary Management may receive products or services from Moloney Securities Co. Inc., a broker-dealer, in connection with clients' securities transactions ("soft dollar benefits"). Moloney Securities Co. Inc., makes available various support services to Monetary Management. However, there is no direct link between our firm's receipt of these benefits and the investment advice we provide to clients.

### **Brokerage and Best Execution**

Monetary Management will take into account all of the factors when determining best execution. However, the firm may not seek the lowest commission cost or charge the lowest fees. Rather it is the overall mix of factors that Monetary Management will use to determine best execution.

### **Directed Brokerage**

Unless the client instructs Monetary Management to do otherwise, Monetary Management will place orders for the execution of transactions through Moloney Securities Co., Inc., who clears securities transactions through RBC Capital Markets or we may place all or a portion of the transactions with a broker with whom the client has a special advisory or consulting relationship. Such transactions are placed with a broker who may have provided manager selection services, performance measurement services, asset allocation services, or a variety of other consulting or monitoring assistance, all with the specific knowledge and full approval of the client. Clients are not required to execute transactions through Moloney Securities and are encouraged to evaluate the reasonableness of the brokerage commission paid based on a comparison with other similar brokers with similar expertise in those specific areas rather than strictly on the rate of the commissions.

With discretionary accounts, when a client requests or instructs Monetary Management to direct a portion of the securities transactions for its account to a specified broker-dealer, Monetary will treat the client's direction as a decision by the client to retain, to the extent of the direction, the discretion that Monetary Management would otherwise have in selecting broker-dealers to effect transactions and in negotiating commissions generally for the client's account. Although Monetary Management will attempt to effect such transactions in a manner consistent with its policy of seeking best execution and price on each transaction, there may be occasions where it is unable to do so, in which case Monetary will continue to comply with the client's instructions on the foregoing basis. The client, therefore, should consider whether, under its direction, commissions, execution, clearance and settlement capabilities, and fees for custodial and other services provided the client by the broker-dealer (if applicable) will be comparable to those otherwise obtainable. A client making such a designation also should understand that it might lose the possible advantage that non-designating clients derive from aggregation of orders for several clients as a single transaction for the purchase or sale of a particular security.

We do not maintain agreements with referring brokers regarding our internal allocation of brokerage transactions. However, all or a sizable portion of a particular clients' brokerage

transaction business may be directed to a particular broker if the client has directed, agreed or stipulated us to do so.

With regard to client directed brokerage, we are required to disclose that we may be unable to negotiate commissions, block or batch client orders or otherwise achieve the benefits described above, including best execution, if you limit our brokerage discretion. Directed brokerage commission rates may be higher than the rates we might pay for transactions in non-directed accounts.

### **Trading Aggregation Practices**

We do not attempt to batch or “bunch” trades in order to create a “block transaction.” Each of the Firm’s investment adviser representatives oversee their own clients’ portfolios and execute trades in their clients’ account(s) on an individual basis.

### **Cross Transactions**

It is our policy not to engage in buying or selling of securities from one managed account to another (typically referred to as a “cross trade”). All trades made for our client accounts will be executed through the open market.

### **Item 13 – Review of Accounts**

Each adviser reviews their investment advisory accounts and managed portfolios as necessary. We do not have a limitation on the number of client accounts assigned to any particular adviser, nor is there a precise sequence or review schedule.

### **Item 14 – Client Referrals and Other Compensation**

Monetary Management does not participate in solicitation arrangements. The Firm does not receive compensation as a result of referring a client to another party and does not pay a fee to a party when a client is referred to them.

### **Item 15 – Custody**

We do not have custody of client cash or securities except as to the direct debiting of the advisory fee when authorized. Each client will select an independent qualified custodian for their account. Clients will receive, no less than quarterly, statements from the broker dealer, bank or other qualified custodian that holds and maintains client’s investment assets. Monetary Management urges you to carefully review such statements and compare such official custodial statements to the reporting we may provide to you. Our reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

### **Item 16 – Investment Discretion**

Monetary Management usually receives discretionary authority from the client in the advisory agreement at the outset of a relationship to select the identity and amount of securities to be bought or sold, commission rates to be determined and broker dealer to be used, all without prior client approval. This discretion is subject to mutually agreed upon investment guidelines relative to the client's portfolio.

When selecting securities and determining amounts, Monetary Management observes the investment policies, limitations and restrictions of the clients for which it advises.

There are times that Monetary Management exercises non-discretionary authority. In these situations, Monetary Management will obtain the client's authorization before placing any trades in the client's account.

### **Item 17 – Voting Client Securities**

It is the policy of Monetary Management to vote proxies for all accounts in accordance with client instructions and in a manner in which Monetary Management believes it to be in the best interests of its clients. In exercising its voting discretion, Monetary Management and its employees shall avoid any direct or indirect conflict of interest raised by such voting decision. Monetary Management generally votes in accordance with the recommendations of the issuer/s existing management, unless it is not prudent to do so. Clients can request a copy of the Firm's proxy voting policies and how their securities were voted by contacting Tom Wright, Jr. In response, the Firm will provide a written response to the client with the information requested at no cost.

### **Item 18 – Financial Information**

Registered investment advisers are required in this Item to provide you with certain financial information or disclosures about Monetary Management's financial condition. Monetary Management has no financial commitment that impairs its ability to meet contractual and fiduciary commitments to clients and has not been the subject of a bankruptcy proceeding.

We do not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, therefore have no material additional financial disclosures to make. Since the firm charges fees in arrears, this does not apply the firm.