

Item 1: Cover Page

PART 2A OF FORM ADV: FIRM BROCHURE

VECTORS RESEARCH MANAGEMENT, LLC



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This brochure provides information about the qualifications and business practices of VECTORS RESEARCH MANAGEMENT, LLC. If you have any questions about the contents of this brochure, please contact us at: 804-217-9002, or by email at: Neil@vectorsresearch.com. 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 Vectors Research Management, LLC is available on the SEC's website at www.adviserinfo.sec.gov

Item 2: Material Changes

The Material Changes section of this brochure will be updated annually, and when material changes occur.

Since the previous release of the Annual Firm Brochure in March 2018 there have been no material changes to report.

Whenever you would like to receive a complete copy of our Firm Brochure, please contact us by telephone at: 804-217-9002 or by email at: Neil@vectorsresearch.com.

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Item 4: Advisory Business

Item 4.A. Firm Description and Principal Owners

Vectors Research Management, LLC (“VRM”, “The Firm” or “Adviser”) is an SEC Registered Investment Adviser founded in August 2004. Registration with the SEC does not imply a certain level of skill or training. The majority owner of the Firm is Andrew Davidson and a non-controlling interest in the Firm is held by Neil Powers (each a principal of the Firm).

The Principals at VRM each have over 33 years of investment experience collectively related to both portfolio management and risk management. VRM also leverages the knowledge, experience and resources of Andrew Davidson & Co., Inc., a related entity who is a provider of risk analytics and consulting to major financial institutions.

The firm currently manages and provides an ongoing supervisor investment program to both institutional and individual separate account portfolios, many of which are high net worth individuals. VRM also provides investment analysis, valuation consulting, and risk management services to major financial institutions.

Item 4.B. Type of Advisory Services

VRM provides equity and fixed income investment management services on both a discretionary and non-discretionary basis to institutions and high net worth individuals. This makes up the significant majority of services provided.

In September 2006, the Adviser began providing separate account investment advisory services on a discretionary basis to Institutional Investors such as Pension Funds, Endowments and Foundations, Banks, and Insurance Companies (the “Accounts”).

In December 2007 the Adviser began providing independent asset valuation consulting services.

In May 2014, the Adviser began providing sub advisory investment management services to the separate accounts of an unaffiliated investment adviser.

Investments across the Fixed Income market include US Treasury, Agency, Corporate, Agency and Non-Agency Mortgage Backed Securities, Asset Backed Securities, Municipal, Collateralized Mortgage Obligations, Home-Equity Loan securities, Manufactured home Loan securities, commercial mortgage-backed securities as well as other securities backed by mortgages, Consumer Loans and Commercial Loans, High Yield Preferred, and International. Investments across equity securities include individual equity securities, alternative asset allocation, ETFs, and closed end mutual funds. Additional

financial instruments includes swaps, swaptions, Treasuries, Treasury options, futures contracts on financial instruments, and mortgage forward contracts known as TBAs

Item 4.C. Tailored Relationships

The goals and objectives for each client are documented in our client relationship management system. Investment policy statements are created that reflect the stated goals and objective. Clients may impose reasonable restrictions on investing in certain securities or types of securities.

Agreements may not be assigned without client consent.

Most clients choose to have VRM manage their assets in order to obtain ongoing in-depth advice and portfolio planning. All aspects of the client's financial affairs are reviewed. Realistic and measurable goals are set and objectives to reach those goals are defined. As goals and objectives change over time, suggestions are made and implemented on an ongoing basis.

The scope of work and fee for an Advisory Service Agreement is provided to the client in writing prior to the start of the relationship. An Advisory Service Agreement includes: cash flow management; investment management (including performance reporting); portfolio management tailored to the specific needs of the client, as well as the implementation of recommendations within each area.

Although the Advisory Service Agreement is an ongoing agreement and constant adjustments are required, the length of service to the client is at the client's discretion. The client or the investment manager may terminate an Agreement by written notice to the other party. At termination, fees will be billed on a pro rata basis for the portion of the quarter completed. The portfolio market value provided by the custodian is validated by the Firm at the completion of the prior full billing quarter that is used as the basis for the fee computation, adjusted for the number of days during the billing quarter prior to termination.

Special reports: for the purposes of analyzing non-agency securities or similar securities issued by the housing agencies subject to credit risk, or by their successors, we provide reports to investors analyzing the risk profile of these securities, including price or yield performance across a range of house price, interest rate and model shock scenarios, together with valuation and relative value analyses that may be used to help decide whether to invest and in what amount.

In separate account management, The Adviser considers the investment objectives and constraints of the Account, and considers the overall macro environment and levels of interest rate risk, credit risk, and structure risk in assessing relative value in fixed income securities. With respect to equities, the Adviser also uses quantitative tools to generate company cash flow and financial ratio analysis to evaluate company and security risk and valuations. The Adviser will also evaluate holdings within an ETF or Fund to determine

sector and other risk distributions to determine market exposure and risk profile of the asset. The Adviser will allocate investments in US Government, Agency, Corporate, High Yield, Mortgage Backed, Asset Backed, Municipal, and other fixed income securities based upon a relative risk and return profile, and appropriateness of the investment depending upon investor objectives. The Adviser will invest in individual equity securities, ETF, or Mutual funds to implement investment strategy depending on relative value and efficiency cost of execution for the portfolio.

In assessing relative value, the Adviser uses proprietary and nonproprietary quantitative models to determine credit risk, interest rate risk and structure risk of various securities. The Adviser obtains information through internally generated research as well as research generated by the Broker/Dealer Community, as well as other public information in analyzing and evaluating credit risk of various securities. The Adviser uses market monitor and trading tools such as Bloomberg, Market Axxess, and Tradeweb to analyze, evaluate, communicate and execute transactions. The Adviser also negotiates verbally with Broker/Dealers to achieve best execution for clients. The Adviser also executes transactions directly on client platforms such as Schwab and TD Ameritrade when efficiencies exist to optimize execution price and transaction costs.

The Adviser offers investment advice in the mortgage-backed securities (“MBS”) and asset-backed securities (“ABS”) markets. This includes securities of Agency MBS, non-Agency MBS, collateralized mortgage obligations (“CMOs”), home-equity loan securities, manufactured home loan securities, commercial mortgage-backed securities as well as other securities backed by mortgages, consumer loans and commercial loans. Additional financial instruments includes swaps, swaptions, Treasuries, Treasury options, futures contracts on financial instruments, and mortgage forward contracts known as TBAs.

The Adviser uses proprietary analytical tools that include prepayment, option-adjusted spread (“OAS”), credit OAS models and other advanced mortgage analytics and risk management tools. These tools include the Andrew Davidson & Co., Inc. Vectors ® Analytics Suite.

One of the Adviser’s strategy related to Special Objective strategies is to invest in MBS and ABS securities that can produce high risk adjusted returns through long term income and capital appreciation. This is achieved through the core strategy and opportunistic strategy, respectively. The core strategy includes high grade and high yield Agency and Non-Agency MBS/ABS assets across sectors. Interest rates risks may be hedged and leverage may be applied. This core strategy mainly generates returns through income. The opportunity strategy takes advantage of event driven opportunities and market dislocations. These typically include assets with leveraged sensitivities to prepayments and credit. This strategy mainly generates returns through income and price appreciation.

Other Special Objective strategies include custom solutions such as asset/liability managed solutions, long term municipal, preferred securities and other customized investment solutions.

Item 4.D. Wrap Fee Programs

The Adviser does not sponsor or manage any Wrap Fee programs.

Item 4.E. Asset Under Management

As of December 31, 2018 VRM managed approximately \$ 268,387,073² in client assets on a fully discretionary basis, as described in the Funds' offering documents. As of that date the firm also managed \$ 91,612,621 in client assets on a non-discretionary basis.

Item 5: Fees and Compensation

Item 5.A. Fee Schedule

VRM bases its fees on a percentage of assets under management.

For Investment Grade Fixed Income Institutional Accounts the basic fee schedule is as follows:

First \$10,000,000 in assets	.35%
Next \$10,000,000 in assets	.30%
Next \$10,000,000 in assets	.25%
Next \$20,000,000 in assets	.20%
Next \$20,000,000 in assets	.15%
Next \$30,000,000 in assets	.10%
Over \$100,000,000 in assets	.08%

For Accounts that include management of Equity, High Yield, Preferred, Non Agency, and other securities requiring more significant analytics and resources, management fees are 1% of total market value of assets provided by the custodian and validated by the Firm.

Fees are paid in arrears based on total account value at the end of each quarter. The Management Fee is prorated for any period that is less than a full fiscal quarter. The fees may be negotiable.

The fees on asset valuation consulting services to financial institutions are negotiated on either an hourly rate or fixed fee basis.

VRM may terminate any of the aforementioned agreements at any time by notifying the client in writing. If the client made an advance payment, VRM will refund any unearned

portion of the advance payment pro-rata any unearned portion of the advance payment. For clients billed in arrears, fees will be billed on a pro rata basis for the portion of the quarter where advisory services were provided.

Item 5.B. Fee Payment

Investment management fees are billed quarterly, in arrears, meaning that the Adviser invoices the client after the three-month billing period has ended. Payment in full is expected upon invoice presentation. The Adviser does not deduct fees from client accounts.

VRM, in its sole discretion, may waive its minimum fee and/or charge a lesser investment advisory fee based upon certain criteria (e.g., “relationship pricing” for multiple accounts, historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.).

Item 5.C. Other Fees

VRM’s fees are exclusive of brokerage commissions, transaction fees, and other related costs and expenses that may be incurred by the client. Such charges, fees and commissions are exclusive of and in addition to VRM’s fee, and VRM shall not receive any portion of these commissions, fees, and costs.

Mutual funds generally charge a management fee for their services as investment managers. The management fee is called an expense ratio. For example, an expense ratio of 0.50 means that the mutual fund company charges 0.5% for their services. Where applicable, these fees are incorporated in the returns generated by the fund.

Performance figures quoted by mutual fund companies in various publications are after their fees have been deducted.

Item 5.D. Prepaid Fees

VRM does not require payment of fees in advance.

Item 5.E. Compensation for Sale of Securities

VRM, and its associated persons, do not receive compensation for the sale of securities or other investment products.

Item 6: Performance-Based Fees and Side-by-Side Management

VRM may receive performance incentive fees on non-sub-advised separate accounts where appropriate (qualified clients) and agreed upon.

VRM receives sub-advisory performance-based bonus incentive fees based on a comparison of the performance of the portfolio composites investment models developed and deployed by the Firm against the performance of the corresponding benchmark indexes.

Performance based fee arrangements may create an incentive for VRM to recommend investments that may be riskier or more speculative than those which would be recommended under a different fee arrangement. Such fee arrangements also create an incentive to favor higher fee paying accounts over other accounts in the allocation of investment opportunities. VRM has procedures designed and implemented to reasonably ensure that all clients are treated fairly and equally, and to prevent this conflict from influencing the allocation of investment opportunities among clients. VRM uses the same models to manage both performance and non-performance based client portfolios, thereby limiting potential conflicts of interest.

Item 7: Types of Clients

VRM generally provides investment advice to individuals, high net worth individuals, endowment and foundation, banks or thrift institutions, investment companies, insurance companies, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations or business entities. Client relationships vary in size, scope, and length of service.

Generally, the minimum initial investment for separate account management is \$20,000,000. The Adviser reserves the right to require a different amount.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Item 8.A. Methods of Analysis

In institutional separate account management, The Adviser considers the investment objectives and constraints of the Account, and considers the overall macro environment and levels of interest rate risk, credit risk, and structure risk in assessing relative value in fixed income securities. The Adviser will allocate investments in US Government, Agency, Corporate, Mortgage Backed, Asset Backed, Municipal, and other fixed income

securities based upon a relative risk and return profile, and appropriateness of the investment depending upon investor objectives.

In assessing relative value, the Adviser uses proprietary and nonproprietary quantitative models to determine credit risk, interest rate risk and structure risk of various securities. The Adviser obtains information through internally generated research as well as research generated by the Broker/Dealer Community, as well as other public information in analyzing and evaluating credit risk of various securities. The Adviser uses market monitor and trading tools such as Bloomberg, Market Axxess, and Tradeweb to analyze, evaluate, communicate and execute transactions. The Adviser utilizes the Andrew Davidson & Co., Inc. Vectors suite of analytics to analyze Agency and Non Agency MBS structure and credit.

Within Equity securities and ETF's, the Adviser balances exposure risk within portfolios to balance risk in the overall portfolio given investor objectives, constraints, and risk tolerance. The Adviser uses quantitative tools to collect individual corporation's financial statements to analyze earnings, cash flow, financial ratios, leverage, and other critical measures. Within ETF's and Mutual Funds, the Adviser evaluates the characteristics and market exposures to determine risk and appropriateness of investment in client portfolios and that each investment is consistent with meeting client objectives.

The Adviser provides investment solutions across a series of strategies to cater to different investor objectives, including:

- Core Fixed Income: Separately managed accounts investing in Investment Grade Fixed Income Securities
- Multi-Sector/Core Plus Fixed Income: Separately managed accounts investing in Investment Grade, High Yield, International and Municipal Securities
- Low Volatility: Separately managed institutional accounts investing in Investment Grade Securities with lower exposure to changes in interest rates and credit risk
- Mortgage Only: Separately managed accounts investing in Agency and Non-Agency Mortgage Backed Securities, including Investment Grade, below Investment Grade, and Structured MBS
- Special Objective: Separately managed accounts and customized investment solutions focused on MBS, taxable or tax-exempt securities
- Consulting: Analysis and advise on valuation, risk management and investment strategies
- Asset Allocation: Separately managed accounts investing in Fixed Income and Equity securities, as well as ETF's across asset classes.

VRM offers investment advice in the mortgage-backed securities ("MBS") and asset-backed securities ("ABS") markets. This includes securities of Agency MBS, non-Agency MBS, collateralized mortgage obligations ("CMOs"), home-equity loan securities, manufactured home loan securities, commercial mortgage-backed securities as well as other securities backed by mortgages, consumer loans and commercial loans. Additional

financial instruments include swaps, swaptions, Treasuries, Treasury options, futures contracts on financial instruments, and mortgage forward contracts known as TBAs.

The Adviser uses proprietary analytical tools which include prepayment and option-adjusted spread (“OAS”) models and other advanced mortgage analytics and risk management tools.

The Adviser’s strategy related to Special Objective Strategies is to invest in MBS and ABS securities that can produce high risk adjusted returns through long term income and capital appreciation. The core strategy includes high grade and distressed MBS/ABS assets across sectors. Interest rates risks may be hedged and leverage may be applied. This strategy mainly generates returns through income. The opportunity strategy takes advantage of event driven opportunities and market dislocations. These typically include assets with leveraged sensitivities to prepayments and credit. This strategy mainly generates returns through income and price appreciation.

Item 8.B. & 8.C. Material Risks

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, prices of fixed income securities may fall.
- **Market Risk:** The price of a security, bond, stock, ETF, or mutual fund 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. For example, political, economic and social conditions may trigger market events.
- **Credit risk:** The risk that a borrower will default on any type of debt by failing to make required payments. The risk is primarily that of the lender and includes lost principal and interest, disruption to cash flows, and increased collection costs.
- **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.
- **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.
- **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 relates to interest payments on fixed income securities and dividends on equity securities.
- **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.

- **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. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.
- **Use of Leverage:** Leverage, or having exposure to more than 100% of an assets value, will generate a higher level of change in an assets value in response to its market price change. For example, a holding that is "2 times levered" will have twice the value change than the asset itself.
- **Hedging:** the purpose of hedging an asset is to minimize the negative consequences of its change in market value due to adverse circumstances. There is no guarantee that a hedging strategy or an asset intended to counter an adverse consequence of an underlying asset will have its intended effect.

Item 9: Disciplinary Information

Items 9.A., 9.B. and 9.C.

VRM and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Item 10: Other Financial Industry Activities and Affiliations

Item 10.A. & 10.B. Registration with Regulated Entities

VRM and its associate persons are not registered with a broker dealer, futures commission merchant, commodity pool operator, or commodity trading advisor.

Item 10.C. Affiliations

VRM has entered into a sub-advisory agreement with HNP Capital, LLC ("HNP"), an unaffiliated registered investment adviser, where VRM provides supervisory investment management separate account sub-advisory services to HNP's client base.

This arrangement was consummated through a fully disclosed arms-length sub-advisory agreement between the two firms for the aforementioned advisory services that are independently discharged by VRM. All advisory services provided to other VRM clients are not impacted by this arrangement. VRM has implemented corresponding allocation procedures specifically designed to mitigate potential conflict of interest.

Andrew Davidson & Co., Inc. (“AD&Co”), as previously noted, is a related entity that provides investment analytical tools and models to institutional clients. VRM manages its clients’ portfolios with standard investment models developed by AD&Co. AD&Co receives no additional monetary compensation in connection with VRM’s use of the models in its advisory services. AD&Co makes no distinction in the provision of its services by treating all clients receiving its standard investment models equally.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Items 11.A., 11.B, 11.C & 11.D Code of Ethics

The Adviser recognizes and believes that (i) high ethical standards are essential for its success and to maintain the confidence of its clients; (ii) its long-term business interests are best served by adherence to the principle that the interests of clients come first; and (iii) it has a fiduciary duty to its clients to act solely for their benefit. All personnel of the Adviser must put the interests of the Adviser’s clients before their own personal interests and must act honestly and fairly in all respects in dealings with clients. All personnel of the Adviser must also comply with all federal securities laws.

The Adviser has adopted a Code of Ethics governing personal trading by its personnel. Among other requirements, the Code of Ethics requires personnel who have access to client portfolio information or the Adviser's non-public securities recommendations to report their personal securities transactions and holdings to the Adviser, and the Adviser is required to review such reports. Clients or prospective clients may obtain a copy of the Code of Ethics by contacting Neil J Powers, CFA (Chief Compliance Officer) by email at neil@vectorsresearch.com, or by telephone at 804-217-9002.

Item 12: Brokerage Practices

Item 12.A. Brokerage Selection

Except for the general investment guidelines set forth in any specific separate account guideline restrictions, there are no limitations on the authority of the Adviser with respect to investment recommendations. The Adviser is authorized to determine the broker or dealer to be used for each securities transaction.

In placing orders, it is the Adviser's policy to obtain the best price and execution for its transactions. Where best price and execution may be obtained from more than one dealer, the Adviser may purchase and sell securities through dealers who provide research, statistical and other information, although specific individual account may not necessarily, in any particular instance, be the direct or indirect beneficiary of the research services provided.

Research and related services furnished or paid for by brokers may include, but is not limited to: (i) written information and analyses concerning specific securities, companies or sectors; (ii) market, financial and economic studies and forecasts; (iii) financial and trade publications; (iv) statistical and pricing services; and (v) discussions with research personnel and consultants. Research and related services obtained by the use of commissions arising from transactions may be used by the Adviser in its other investment activities.

In selecting brokers and negotiating commission rates, the Adviser will take into account the financial stability and reputation of brokerage firms and the brokerage and research services provided by such brokers, although the account may not, in any particular instance, be the direct or indirect beneficiary of the research services provided. The Adviser will also consider the brokers capability to provide liquidity, source securities, and execute transactions in each of the market sectors the Adviser is involved. Broker coverage is reviewed on an ongoing basis. The Adviser does not utilize soft dollars.

Item 12.B. Purchase Allocations

When managing client accounts, the Adviser takes into consideration each of the individual client investment objectives. When similar strategies or securities are executed in market, all clients will be treated equally with respect to execution, including allocating security purchases and sales on a pro-rata basis when appropriate for all strategies.

Item 13: Review of Accounts

Item 13.A, 13.B & 13.C. Periodic Reviews

For clients, account reviews are performed quarterly by Neil Powers, CFA, Principal. Account reviews are performed more frequently when market conditions dictate. The quarterly client review is a written document and includes an analysis of the portfolio, including portfolio allocations and performance, along with an in depth review of the current market environment.

In addition to quarterly client reviews, the portfolios are reviewed on a weekly basis by the Adviser to monitor and track portfolio allocations, security selection, risk analysis and performance metrics.

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Account reviewers are members of the firm's Risk Management Committee. They are instructed to consider the client's current security positions and the likelihood that the performance of each security will contribute to the investment objectives of the client. Additionally, the Adviser reviews the client guidelines on an ongoing basis to verify compliance with the Client agreement as a pre-trade screening process.

Item 14: Client Referrals and Other Compensation

Item 14.A. Incoming Referrals

VRM has been fortunate to receive many client referrals over the years. The referrals come from current clients, consultants, estate planning attorneys, accountants, employees, personal friends of employees and other similar sources. The Adviser does not provide compensation to others for client referrals.

Item 14.B. Referrals Out

VRM does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Item 15: Custody

VRM is not deemed to have custody of client funds.

The custodian provides account statements directly to clients at their address of record at least quarterly

Clients are urged to compare the account statements received directly from their custodians to the performance report statements provided by VRM.

Investment performance is reported by VRM to clients at least quarterly, and in many cases monthly.

Item 16: Investment Discretion

In the case of Discretionary Advisory agreements, VRM accepts discretionary authority to manage securities accounts on behalf of clients. VRM has the authority to determine, without obtaining specific client consent, the securities to be bought or sold, and the amount of the securities to be bought or sold, subject to client guidelines and restrictions.

Discretionary trading authority facilitates placing trades in client accounts on their behalf so that VRM may promptly implement the investment policy that the client has approved in writing.

In the case of Non-Discretionary Advisory Agreements, VRM consults with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

Any other limitations imposed on VRM are established in client arrangements through VRM's acceptance of client imposed reasonable investment restrictions, limitations and guidelines, as well as any other limitations imposed by operation of law, such as ERISA.

The client approves the custodian to be used and the fees paid to the custodian. VRM does not receive any portion of the fees paid by the client to the custodian.

Item 17: Voting Client Securities

Unless the client designates otherwise, VRM votes proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy. A copy of VRM's proxy voting policy is available upon request at Neil@vectorsresearch.com

Item 18: Financial Information

Item 18.A., 18.B. & 18.C Financial Condition

VRM does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

Item 1: Cover Page

PART 2B OF FORM ADV: BROCHURE SUPPLEMENT

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This brochure supplement provides information that supplements the Vectors Research Management, LLC brochure. You should have received a copy of that brochure. Please contact us at 804-217-9002, or by email at: Neil@vectorsresearch.com if you did not receive Vectors Research Management, LLC's brochure or if you have any questions about the contents of this supplement.

March 29, 2019

Item 2: Educational Background and Business Experience

While Vectors Research Management, LLC has no formal minimum education and business requirements, any future personnel involved in investment advisory activities generally will possess several years of experience in the areas of security analysis and corporate finance, with a demonstrated thorough understanding of mortgage and debt and equity markets, as well as some level of relevant college and graduate school education and/or have obtained the CFA designation.

Employees have earned certifications and credentials that are required to be explained in further detail.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfill society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the annual Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Andrew Davidson – Principal

Andrew Davidson, 59, is co-founder and CIO at Vectors Research Management, LLC. Mr. Davidson is also President and founder of Andrew Davidson & Co., Inc. (“AD&Co”), a leading developer and provider of MBS/ABS analytical tools. AD&Co provides consulting advice on risk management, security valuation, and investment strategies for a broad range of financial institutions.

Prior to AD&Co he worked for six years at Merrill Lynch, where he was a Managing Director in charge of a staff of 60 financial and systems analysts. In this role, he developed sophisticated analytical tools, including prepayment and option-adjusted spread models, as well as sophisticated portfolio analysis tools. He initiated a comprehensive set of investor-oriented publications and established groups of specialized analysts to advise traders, sales people and investors. He has an extensive trading desk background and experience in risk management roles. Andrew began his financial career as an analyst in Exxon’s Treasurer’s Department. He received an MBA in Finance at the University of Chicago and a BA in Mathematics and Physics at Harvard.

Neil Powers, CFA - Principal

Neil Powers, 57, is a co-founder and Portfolio Manager at Vectors Research Management, LLC. He has over 30 years of portfolio management experience in Fixed Income, Equity, Mutual Funds, and Asset Allocation.

Prior to Vectors, Mr. Powers served as the Head of Fixed Income for 7 years at Crestar Asset Management Co. and Co-Head of Fixed Income at Trusco Capital Management Co. Neil managed Institutional accounts and Mutual fund portfolios including Municipal, Government, Corporate and Mortgage funds, and created and managed the Multi-Sector Strategic Income Fund. That includes US Investment Grade, High Yield and International.

Mr. Powers also worked at Putnam Investments for 12 years, where he was a Senior Portfolio Manager for Core and Core Plus Institutional accounts and the Lead Portfolio Manager for the Putnam family of Multi-Sector Bond mutual funds. Institutional clients included Insurance Company, Corporate, Pension, State and County Government, Endowment and Foundation, and Financial Institution assets. He started at Putnam Investments as a quantitative analyst building yield curve and sector relative value models.

Neil is a CFA, and graduated from West Virginia University with a BS in Finance specializing in securities and investments.

Mitchell DeShane – Quantitative Analyst

Mitchell is an analyst at Vectors, starting in the summer of 2018. He graduated from West Virginia University in the Spring of 2018, with a B.S. in Finance. Mitchell specializes in Equity and Credit Analysis and is a core piece to Vectors Portfolio Management Team.

Joe Cheatham – Quantitative Analyst

Joe is an analyst for Vectors, currently studying at Virginia Tech. He is projected to graduate in the Spring of 2019 with a B.S. in Finance and Business Information Technology. Joe specializes in systems integration and is a core piece to Vectors Portfolio Management Team.

Item 3: Disciplinary Information

There is no disciplinary information for Vectors Research Management, LLC's supervised persons. None of the supervised persons have been party to: a) a criminal or civil action in a domestic, foreign or military court; b) an administrative proceeding before the SEC, any other federal regulatory agency, any state regulatory agency or any foreign financial regulatory

authority; c) a self-regulatory proceeding; or d) any other proceeding in which a professional attainment, designation, or license was revoked.

Item 4: Other Business Activities

Andrew Davidson

Andrew Davidson is also President and founder of Andrew Davidson & Co. Inc. (“AD&Co”), a related entity, which is a leading developer and provider of MBS/ABS analytical tools. VRM manages its clients’ portfolios with standard investment models developed by AD&Co. AD&Co receives no additional monetary compensation in connection with VRM’s use of the models in its advisory services. AD&Co makes no distinction in the provision of its services by treating all clients receiving its standard investment models equally.

Neil Powers

Neil Powers also serves as the Chief Investment officer of HNP Capital, LLC, a registered investment adviser managing fixed income and equity portfolios for institutions and high net worth individuals.

VRM has entered into a sub-advisory agreement with HNP Capital, LLC (“HNP”), an unaffiliated registered investment adviser, where VRM provides supervisory investment management separate account sub-advisory services to HNP’s client base. This arrangement was consummated through a fully disclosed arms-length sub-advisory agreement between the two firms for the aforementioned advisory services that are independently discharged by VRM. All advisory services provided to other VRM clients are not impacted by this arrangement. VRM has implemented corresponding allocation procedures specifically designed to mitigate any potential conflict of interest.

Mitchell DeShane

Mitchell Deshane does not have any other business activities to disclose.

Joe Cheatham

Joe Cheatham does not have any other business activities to disclose.

Item 5: Additional Compensation

Andrew Davidson

Andrew Davidson does not receive any additional compensation from third parties for providing advisory services to Vectors Research Management, LLC’s clients.

Neil Powers

Neil Powers does not receive any additional compensation from third parties for providing advisory services to Vectors Research Management, LLC's clients.

Mitchell Deshane

Mitchell DeShane does not receive any additional compensation from third parties for providing advisory services to Vectors Research Management, LLC's clients.

Joe Cheatham

Joe Cheatham does not receive any additional compensation from third parties for providing advisory services to Vectors Research Management, LLC's clients.

Item 6: Supervision

Vectors Research Management, LLC has in place written policies and procedures reasonably designed to detect and prevent violations of the securities laws, rules and regulations. Neil J Powers, CFA is Vectors Research Management, LLC's Chief Compliance Officer and, as such, is the person responsible for administering the compliance program, monitoring the Firm's Code of Ethics, and supervising the activities of the Supervised Persons. Mr. Powers can be contacted at (804) 217-9002.

Andrew Davidson

Andrew Davidson is the co-founder and Partner of Vectors Research Management, LLC.

Neil Powers

Neil Powers is the co-founder, Partner and Chief Compliance Officer of Vectors Research Management, LLC and reports to Andrew Davidson. Mr. Davidson can be reached at 212-431-0857

Mitchell DeShane

Mitchell DeShane is Quantitative Analyst of Vectors Research Management, LLC, and reports to Neil Powers. Mr. Powers can be reached at (804) 217-9002.

Joe Cheatham

Joe Cheatham is Quantitative Analyst of Vectors Research Management, LLC, and reports to Neil Powers. Mr. Powers can be reached at (804) 217-9002.

