Part 2A of Form ADV: Firm *Brochure*

Item 1 Cover Page

X Vector, Ltd.

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www.xvector.ltd

October 1st, 2019

This brochure provides information about the qualifications and business practices of X Vector, Ltd. If you have any questions about the contents of this brochure, please contact us at (775) 453-0010 or josh.flatley@xvector.ltd . 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 X Vector, Ltd. also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

This is the first publication of the X Vector, Ltd. firm brochure and there are no material changes to report.

Item 3 Table of Contents

Item 4 Advisory Business

A. X Vector, Ltd. has been in business since October 2019 and its principal owner is Joshua M. Flatley.

B. The firm offers financial planning services and complies with the CFP BOARD'S *CODE OF ETHICS AND STANDARDS OF CONDUCT* FOR CFP® PROFESSIONALS EFFECTIVE OCTOBER 1, 2019 (pages 7-9 of this brochure).

C. The firm tailors advisory services to the individual needs of *clients*, using the client-specific, iterative process described above. *Clients* may impose restrictions on investing in certain securities or types of securities.

D. The firm does not participate in *wrap fee programs*.

E. The firm does not manage *client* assets. However, if client chooses the Asset-based billing option, the amount considered will the client's assets listed Statement of Financial Position in (i.e.-all securities, real estate, and other items of value in net worth calculation) and as of the date (recalculated annually) the financial plan is presented.

Item 5 Fees and Compensation

A. X Vector, Ltd is compensated directly by the clients for advisory service. The fee schedule* is:

- Fee-for-service retainer: 2.0% of gross annual income (billed monthly), OR
- Assets Under Advisement (AUA): 0.2% of all client assets included in net worth statement**, OR
- Hourly: $200.00 per hour, billable in 6-minute increments

*The fees will be specified in the Financial Planning Engagement Letter. However, fees could be based on a combination of retainer and AUA parameters. Billing method will also be described in the agreement. Fees are negotiable.

**General valuations for Assets Under Advisement (not all-inclusive) are:

ASSETS UNDER ADVISEMENT CALCULATION

Asset Type	**Valuation Method**	**Frequency of Valuation Updates**
Stocks	Price at close of market	Annually, on anniversary date of most recent financial plan
Mutual funds	Net Asset Value	Annually, on anniversary date of most recent financial plan
Residential real estate	Primary: Qualified appraisal Secondary: Zillow value	Annually, on anniversary date of most recent financial plan
Commercial real estate	Commercial appraisal	Annually, on anniversary date of most recent financial plan
Collectibles	Appraisal	Initial comprehensive plan
Precious Metals	Market	Annually, on anniversary date of most recent financial plan

B. Clients may select to either be billed for fees incurred or have fees deducted from clients' assets. Clients will be billed or have fees deducted monthly.

C. Clients will incur brokerage and other transaction costs. Please see Item 12 of this brochure.

D. Clients must pay $500.00 in advance. This amount is refundable if the advisory contract is terminated in writing before the end of the billing period. The amount of the refund will be the $500.00 minus billable amounts for work completed prior to termination.

E. No one in the firm accepts compensation for the sale of securities or other investment products.

Item 6 *Performance-Based Fees* and Side-By-Side Management

The firm does not accept *performance-based fees.*

Item 7 Types of *Clients*

The firm's ideal client is an individual who is a professional airplane pilot, born between 1965 and 1980, with an annual income greater than $100k OR investable assets greater than $1 million.

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

A. The firm uses fundamental analysis in formulating investment advice. Investing in securities involves risk of loss that clients should be prepared to bear.

B. The material risks involved in fundamental analysis is that there may be insufficient information provided pertaining to the source documents or that the empirical data may be mis-interpreted.

C. The firm does not recommend a particular type of security.

Item 9 Disciplinary Information

There are no material legal or disciplinary events to disclose.

Item 10 Other Financial Industry Activities and Affiliations

A. No *management persons* are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

B. No *management persons* are registered, or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

C. There is no relationship or arrangement with any related person listed that is material to the advisory business.

D. The firm does not receive compensation, directly or indirectly, in recommendation or selection of other investment advisers for clients. The firm will, however, coordinate with other financial professionals to implement financial plans (for instance, broker-dealers for investments, insurance agents, and estate planning attorneys).

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

A. The firm is not an SEC-registered adviser, however, will provide a copy of code of ethics to any client or prospective client upon request.

B. The firm does not recommend to clients, or buy or sell for client accounts, securities in which it has a material financial interest.

C. Any conflict of interest created through personal trading of principals of the firm and recommendations for clients is coincidental. Individualized recommendations are made based on fundamental analysis of client's unique circumstances.

D. Any conflict of interest created through timing of personal trades by principals of the firm and recommendations for clients is coincidental. Individualized recommendations are made based on fundamental analysis of client's unique circumstances.

Item 12 Brokerage Practices

A. The firm does not select or recommend specific broker-dealers for client transactions. If requested by client, the firm will review the reasonableness of compensation for whichever broker-dealer the client chooses to work with.

B. The firm does not work directly with the custodians and cannot aggregate orders.

Item 13 Review of Accounts

A. The Managing Member of the firm will conduct comprehensive reviews of client financial plans annually.

B. A request by the *client* will trigger a review of financial plans on other than a periodic basis.

C. Clients may view an online "dashboard" for the most current status of their financial plans.

Item 14 *Client* Referrals and Other Compensation

A. The firm does not receive any economic benefit from anyone other than the *client*.

B. The firm does not compensate any *person* for client referrals.

Item 15 *Custody*

The firm does not have *custody* of *client* funds or securities.

Item 16 Investment Discretion

The firm does not accept *discretionary authority* to manage securities accounts on behalf of *clients*.

Item 17 Voting *Client* Securities

The firm does not have, nor will it accept, authority to vote *client* securities.

Item 18 Financial Information

A. The firm does not require or solicit prepayment of more than $500 in fees per client, six months or more in advance.

B. The firm does not have *discretionary authority* or *custody* of *client* funds; nor does it solicit prepayment of more than $500 in fees per *client,* six months or more in advance.

C. No member of the firm has been the subject of a bankruptcy petition at any time during the past ten years.

Item 19 Requirements for State-Registered Advisers

A. Please see Part 2B of Form ADV, Item 2.

B. Managing member of firm is also in the Air Force Reserve and spends approximately two to four weeks a month engaged on that business.

C. No member of the firm is compensated with *performance-based fees*.

D. No *management person* has been *involved* in any of the events listed in this section.

E. No *management persons* have any relationship with any issuer of securities not listed in Item 10.C. of Part 2A.

C. PRACTICE STANDARDS FOR THE FINANCIAL PLANNING PROCESS

In complying with the Practice Standards, a CFP® professional must act prudently in documenting information, as the facts and circumstances require, taking into account the significance of the information, the need to preserve the information in writing, the obligation to act in the Client's best interests, and the CFP® Professional's Firm's policies and procedures.

1. Understanding the Client's Personal and Financial Circumstances

a. Obtaining Qualitative and Quantitative Information. A CFP® professional must describe to the Client the qualitative and quantitative information concerning the Client's personal and financial circumstances needed to fulfill the Scope of Engagement and collaborate with the Client to obtain the information.

i. Examples of qualitative or subjective information include the Client's health, life expectancy, family circumstances, values, attitudes, expectations, earnings potential, risk tolerance, goals, needs, priorities, and current course of action.

ii. Examples of quantitative or objective information include the Client's age, dependents, other professional advisors, income, expenses, cash flow, savings, assets, liabilities, available resources, liquidity, taxes, employee benefits, government benefits, insurance coverage, estate plans, education and retirement accounts and benefits, and capacity for risk.

b. Analyzing Information. A CFP® professional must analyze the qualitative and quantitative information to assess the Client's personal and financial circumstances.

c. Addressing Incomplete Information. If unable to obtain information necessary to fulfill the Scope of Engagement, the CFP® professional must either limit the Scope of Engagement to those services the CFP® professional is able to provide or terminate the Engagement.

2. Identifying and Selecting Goals

a. Identifying Potential Goals. A CFP® professional must discuss with the Client the CFP® professional's assessment of the Client's financial and personal circumstances, and help the Client identify goals, noting the effect that selecting a particular goal may have on other goals. In helping the Client identify goals, the CFP® professional must discuss with the Client, and apply, reasonable assumptions and estimates. These may include life expectancy, inflation rates, tax rates, investment returns, and other Material assumptions and estimates.

b. Selecting and Prioritizing Goals. A CFP® professional must help the Client select and prioritize goals. The CFP® professional must discuss with the Client any goals the Client has selected that the CFP® professional believes are not realistic.

3. Analyzing the Client's Current Course of Action and Potential Alternative Course(s) of Action

a. Analyzing Current Course of Action. A CFP® professional must analyze the Client's current course of action, including the material advantages and disadvantages of the current course and whether the current course maximizes the potential for meeting the Client's goals.

b. Analyzing Potential Alternative Courses of Action. Where appropriate, a CFP® professional must consider and analyze one or more potential alternative courses of action, including their material advantages and disadvantages of each alternative, whether each alternative helps maximize the potential for meeting the Client's goals, and how each alternative integrates the relevant elements of the Client's personal and financial circumstances.

4. Developing the Financial Planning Recommendation(s)

From the potential courses of action, a CFP® professional must select one or more recommendations designed to maximize the potential for meeting the Client's goals. The recommendation may be to continue the Client's current course of action. For each recommendation selected, the CFP® professional must consider the following information:

a. The assumptions and estimates used to develop the recommendation;

b. The basis for making the recommendation, including how the recommendation is designed to maximize the potential to meet the Client's goals, the anticipated material effects of the recommendation on the Client's financial and personal circumstances, and how the recommendation integrates relevant elements of the Client's personal and financial circumstances;

c. The timing and priority of the recommendation; and

d. Whether the recommendation is independent or must be implemented with another recommendation.

5. Presenting the Financial Planning Recommendation(s)

A CFP® professional must present to the Client the selected recommendations and the information that was required to be considered when developing the recommendation(s).

6. Implementing the Financial Planning Recommendation(s)

a. Addressing Implementation Responsibilities. A CFP® professional must establish with the Client whether the CFP® professional has implementation responsibilities. When the CFP® professional has implementation responsibilities, the CFP® professional must communicate to the Client the recommendation(s) being implemented and the responsibilities of the CFP® professional, the Client, and any third-party with respect to implementation.

b. Identifying, Analyzing, and Selecting Actions, Products and Services. A CFP® professional who has implementation responsibilities must identify and analyze actions, products, and services designed to implement the recommendations. The CFP® professional must consider the basis for each selection, which must include:

i. How the action, product, or service is designed to implement the CFP® professional's recommendation; and

ii. The advantages and disadvantages

of the action, product, or service relative to reasonably available alternatives.

c. Recommending Actions, Products, and Services for Implementation. A CFP® professional who has implementation responsibilities must recommend one or more actions, products, and services to the Client. The CFP® professional must discuss with the Client the basis for selecting an action, product, or service, the timing and priority of implementing the action, product, or service, and disclose and manage any Material Conflicts of Interest concerning the action, product, or service.

d. Selecting and Implementing Actions, Products, or Services. A CFP® professional who has implementation responsibilities must help the Client select and implement the actions, products, or services. The CFP® professional must discuss with the Client any Client selection that deviates from the actions, products, and services the CFP® professional recommended.

7. Monitoring Progress and Updating

a. Monitoring and Updating Responsibilities. A CFP® professional must establish with the Client whether the CFP® professional has monitoring and updating responsibilities. When the CFP® professional has responsibilities for monitoring and updating, the CFP® professional must communicate to the Client:

i. Which actions, products, and services are and are not subject to the CFP® professional's monitoring responsibility;

ii. How and when the CFP® professional will monitor the actions, products, and services;

iii. The Client's responsibility to inform the CFP® professional of any Material changes to the Client's qualitative and quantitative information;

iv. The CFP® professional's responsibility to update the Financial Planning recommendations; and

v. How and when the CFP® professional will update the Financial Planning recommendations.

b. Monitoring the Client's Progress. A CFP® professional who has monitoring responsibilities must analyze, at appropriate intervals, the progress toward achieving the Client's goals. The CFP® professional must review with the Client the results of the CFP® professional's analysis.

c. Obtaining Current Qualitative and Quantitative Information. A CFP® professional who has monitoring responsibility must collaborate with the Client in an attempt to obtain current qualitative and quantitative information concerning the Client's personal and financial circumstances.

d. Updating Goals, Recommendations, or Implementation Decisions. Where a CFP® professional has updating responsibility, and circumstances warrant changes to the Client's goals, recommendations, or selections of actions, products or services, the CFP® professional must update as appropriate in accordance with these *Practice Standards.*