Q1 2019 Investor Letter

"Give me six hours to chop down a tree and I will spend the first four hours sharpening the axe."
- Abraham Lincoln

The markets always have a way of punishing those who are positioned with the "crowd" and rewarding those who are patient. The fourth quarter of 2018 was highlighted by record volatility in most risk markets. The Bramshill Income Performance Strategy (the "Strategy") was conservatively positioned in 4Q18 with high liquidity and heavy allocations (approximately 25%) to cash and short term US Treasuries. This fortuitous positioning allowed us, first, to miss most of the drawdown in the credit markets in this period and, second, to opportunistically allocate significant capital in December to credit sensitive asset classes and securities which had suffered historic price depreciation. In our investment process, we always maintain a bullpen of securities, on which we have prepared our credit analysis. We place price targets on these securities, and often times, they never find a place in our portfolio because they do not reach our price targets. In December 2018, many of these securities reached our price targets. We allocated significant risk capital to such names in our bullpen, which had substantial "margins of safety" at our entry points. This has resulted in a strong start to 2019 with the Strategy up approximately 5%** thru the first two months of the year.

Looking back, the month of December 2018 seems very similar to the events of January 2016. If you recall, within the month of January 2016, the S&P 500 lost as much as -9% and US high yield dropped -4.3%. At that time, the Bramshill Income Performance Strategy was very conservatively positioned and lost only -8bps net that month. We deployed significant capital in 1Q2016, mostly in US corporate bonds, and finished that year up +7.46% net. On a similar note, during the month of December 2018, the S&P 500 lost as much as -12% and US high yield lost more than -3%. All liquid markets experienced significant volatility due to many conflicting headlines regarding trade, Brexit, and the Federal Reserve. Our Strategy lost -118bps for the month of December 2018, which brought the 2018 year end return of the Strategy to +1.40% net. However, similar to 2016, our conservative positioning once again allowed us to be tactical in deploying capital at an opportune time. As markets repriced, we allocated approximately 2/3 of our liquidity position across existing names in the portfolio. Prices and yields on many securities were in freefall and represented significant opportunities that we have not seen in many years. We believe the current market conditions are set up for extremely favorable conditions for our portfolio to perform.

Performance and Portfolio Positioning (as of 01/31/2019)

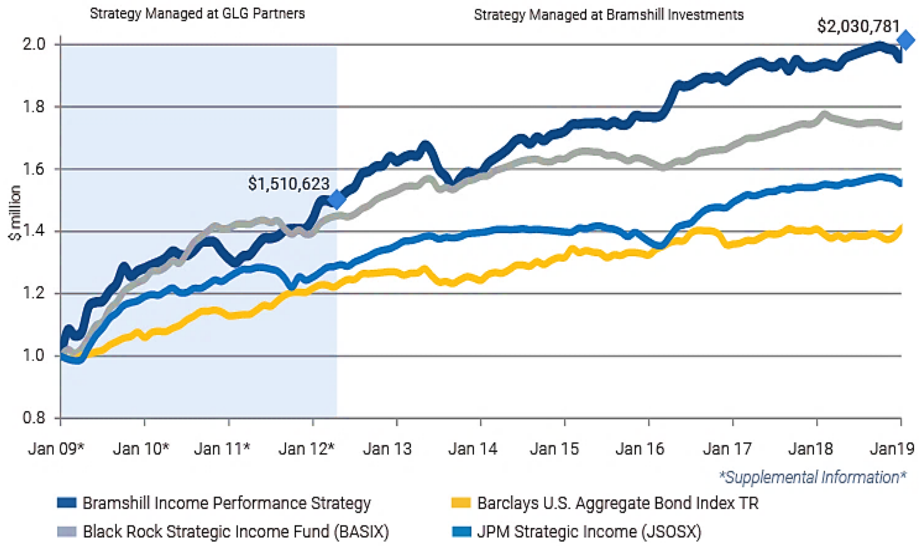
Returns are net of fees

	YTD	1 Year*	3 Years*	5 Years	7 Years*	1/1/09 - 01/31/2019*
Bramshill Income Performance Strategy	**3.77%****	**4.71%**	**4.76%**	**4.65%**	**4.49%**	**7.28%**
Barclays U.S. Aggregate Bond Index TR	1.06%	2.25%	1.95%	2.44%	2.12%	3.56%
Blackrock Strategic Income Fund	1.27%	-0.94%	2.95%	2.20%	3.07%	5.77%
JPM Strategic Income	1.24%	1.49%	5.10%	2.37%	3.14%	4.60%

** Annualized Returns*

***As of 02/28/2019, the Bramshill Income Performance Strategy returned an estimated 5.02% YTD. Please note that February performance is unofficial.*

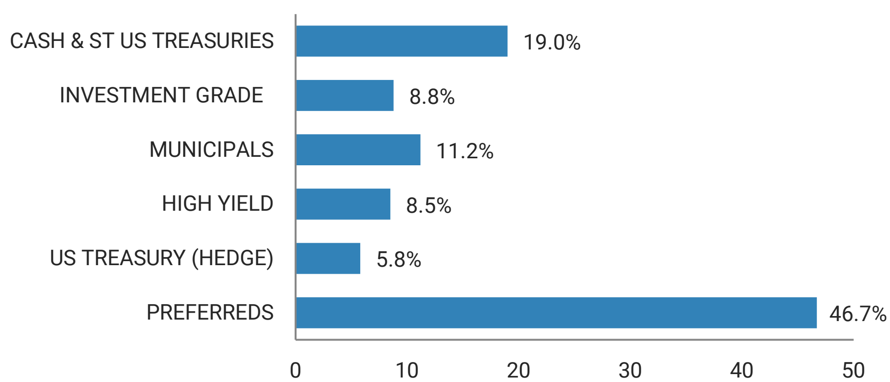
The Bramshill Income Performance Strategy reflects composite performance of separately managed accounts. Managed accounts do not incur many of the operating costs associated with the registered investment companies to which it is being compared.



Our economic outlook has not changed markedly despite the recent price volatility of financial assets. We continue to find ourselves constructive on growth, although a bit tempered from the 3-4% GDP growth targets of last year. Current consensus growth targets are likely to settle in the 2-2.5% range. The impact of such a slowdown will likely subdue equity returns in 2019. However, moderate growth is likely constructive for US credit. Additionally, because the Fed recently altered the trajectory of its tightening cycle, credit spreads will likely grind tighter until there is a substantial negative catalyst. At this time, we do not foresee such a negative catalyst in the short term.

In our recent notes, we have discussed why we believe a steepening of the US Treasury yield curve is warranted. Although most media outlets focus on the 2's/10's curve (which tightened in 2018), we also track the 5's/30's curve which bottomed at 20bps in July and has since steepened to 51bps as of 12/31/18. We are now more adamant that such a steepening is warranted. With the Fed on hold, the short end of the yield curve will likely see increased demand. Regarding the 30-year US Treasury, there will likely be less demand for duration due to the inflationary factors such as a tight US labor market and commodity price inflation. Additionally, in recent days, the Fed has indicated its willingness to allow the US economy to "run hot" in order to more consistently reach its stated inflation target of 2%.

Since mid-2017, our investment team has highlighted the risk that higher rates could be the disruptive catalyst in the markets. In 2018, our US Treasury hedge significantly mitigated potential losses in our portfolio and played a much larger factor in our investment process than at any other point in our 10-year history of the Strategy. During 4Q18, uncertainty in the markets about growth and inflation, oversold conditions in the US Treasury market, and record short positioning, were the impetus for us to exit our hedges. However, we re-instituted our rate hedge in recent weeks in early 2019.



Portfolio allocations as of 02/28/2019

Our preferred allocation is now approximately, 47% of the portfolio. This was a marked increase from mid 2018 at less than 40% of the portfolio. With regard to this allocation, which is predominantly preferreds in the financial sector, our thesis is that US financial institutions may reduce earnings forecasts for 2019; however, their balance sheets and credit quality remain robust, and we are confident about the safety of the coupons on these securities.

One particular asset class to which we allocated in recent months was municipal closed end funds. These funds approached the largest discounts to NAV in the past 10 years. We increased our allocation to municipal closed end funds which represent approximately 11% of the portfolio at this time. When we allocated, these funds were trading in excess of 15% discounts to NAV and offered attractive yields relative to corporate bonds. Recent performance has been strong in these funds, but we believe substantial upside remains.

At Bramshill we look to manage risk across various environments like we have done in this Strategy over the past 10 years. We are currently excited about this environment as many securities are priced with a low loss probability and yet are giving us a significant increase in yield when compared to most of 2018. In the quarter ahead we anticipate volatility across many markets due to the large variance of economic forecasts. We will remain nimble and flexible to adjust to these market conditions. In 2019, the portfolio has benefitted from the opportunistic rotation described above out of cash/ST US Treasuries into preferreds, credit, and municipal closed end funds. In particular, we benefitted from positions in the financial sector which generally reported better than expected earnings and healthy balance sheets. Prices in the credit markets moved up rapidly in January and February. Into this rally, we have moderately taken some profits on our high yield exposure and our preferred exposure and rebuilt some of our liquidity position. We will maintain our focus on positions which are less sensitive to interest rates. We believe the current credit environment is ripe with opportunities.

Forward Outlook

The market seems content with the current level of interest rates, yet we envision long-term rates moving higher throughout the year. The big challenge for us is to manage a credit portfolio that participates in a constructive environment but avoids the disruptive catalysts of late 2018. We maintain essentially a similar approach to our 2018 playbook except the entry points for our positions are much more favorable. We still believe fixed to float preferred's offer superior yields for their duration profile. We have little exposure to any asset classes with significant rate exposure. In a stable environment, our portfolio will generate a healthy yield premium to most US credit. In a volatile environment, we will be prepared to once again execute our tactical nature when given the opportunity.

BRAMSHILL INVESTMENTS

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Year	Gross Return (%)	Net Return (%)	Benchmark Return (%)	Composite 3-Yr St Dev (%)	Benchmark 3-Yr St Dev (%)	Number of Portfolios	Internal Dispersion (%)	Composite Assets ($M)	Firm Assets ($M)
***2012	7.82	7.55	2.7	****	****	5	*****	168	174
2013	-1.59	-2.33	-2.02	****	****	6	0.22	136.2	136.4
2014	9.37	8.53	5.95	****	****	11	0.54	94.8	119.6
2015	3.32	2.65	0.57	3.94	2.92	28	1.42	92.1	129.2
2016	8.27	7.46	2.65	2.84	3.02	57	0.73	147.4	501.1
2017	2.43	1.59	3.54	****	2.81	148	****	336	821
2018	2.17	1.4	0.01	****	****	186	****	591.5	2200.1

This investment outlook is provided by Bramshill Investments, LLC ("Bramshill" or the "Firm"), an asset management firm and federally registered investment adviser, for informational purposes only. This commentary may not be suitable for all investors and contains forward-looking statements, which may not come to pass. No statement contained herein is to be construed as a solicitation or offer to buy or sell a security, or the provision of personalized investment, tax or legal advice. Past performance does not guarantee future results, as there can be no assurance that Bramshill will be able to achieve returns similar to those depicted herein. Investing involves risk, including the potential loss of principal, and returns may be adversely impacted by unforeseen changes in mar- ket and/or economic conditions. As disclosed in its Form, Bramshill generally charges a management fee of up to 100 basis points (1.00%) for the Strategy discussed, which has the effect of reducing overall portfolio returns. Any reference to a market index is included for comparative purposes only, as indices are not securities in which an investment can be made. Indices are unmanaged vehicles that serve as market or sector indicators and do not account for man- agement fees or transactional costs generally associated with managed accounts and/or investable products. The Firm does not represent that any stated index is an appropriate benchmark, as the volatility and composition of such may differ materially from the accounts managed pursuant to the Strategy.

The Asset Management Division of Bramshill Investments, LLC (the "Firm") claims compliance with the Global Investment Performance Standards (GIPS®) and has prepared and presented this report in compliance with the GIPS® standards. The Firm has been independently verified for the period May 2012 through December 2017. The verification report is available upon request. Verification assesses whether (i) the Firm has complied with all the composite construction requirements of the GIPS® standards on a firm-wide basis and (ii) the Firm's policies and procedures are designed to calculate and present performance in compliance with the GIPS® standards. Verification does not ensure the accuracy of any specific composite presentation.

The Firm is a New Jersey-based, federally registered investment adviser that provides strategy-based asset management services to institutions, family offices and high-net-worth individuals in a separately managed account and/or fund format. The Firm's has established policies for valuing portfolios, calcu- lating performance, and preparing GIPS® compliant presentations. These policies, as well as a list of all Firm composites, are available upon written request.

Bramshill Income Performance is a fixed income strategy that seeks to maximize total return across various asset classes. This Strategy invests in an un- constrained portfolio of income-producing securities, including investment grade and high-yield bonds, preferred securities, municipal bonds, U.S. Treasuries, income exchange traded funds, and closed-end funds. The portfolio is actively managed, incorporating sector allocations and tactical hedging during various interest rate and market environments. This Strategy uses fundamental credit and relative value analysis, and focuses on securities with transparent pricing, actively-traded capital structures and liquidity. This Strategy is unlevered, highly-liquid, not benchmark dependent, and seeks to maintain an investment grade portfolio. Accounts will generally hold a maximum of 50 investment positions. The Barclays Capital U.S. Aggregate Index is listed as the Strategy's benchmark and is intended to serve as a comparative indicator of the overall performance relative to the U.S. dollar denominated investment grade fixed rate taxable bond market. The index currently includes U.S. Treasuries, government related securities, corporate bonds, agency mortgage-backed passthroughs, consumer asset-based securities, and commercial mortgage backed securities. Indexes are not securities in which direct investments can be made and they do not account for the fees and expenses generally associate with investable products.

In calculating net returns, the Firm aggregates the net realized/unrealized capital gains/losses and investment income achieved in composite accounts, net of all trading expenses, investment management fees, custody fees and fund maintenance fees (where applicable). Gross returns are gross of investment management fees and net of all trading expenses, custody fees and fund maintenance fees (where applicable). The standard management fee for the Strat- egy is 100 basis points (1.00%) per annum; however, actual fee rates vary. Internal dispersion is calculated using the equal-weighted standard deviation of annual gross returns of those portfolios that were included in the composite for the entire year. For purposes of the GIPS® composite, the minimum initial investment is $100,000 and the creation date is January 2015. All performance is expressed in U.S. Dollars.

Past performance does not guarantee of future results, as there can be no assurance the Firm will be able to achieve results similar to those depicted herein. Investing involves risk, including the potential loss of principal.

*** As Bramshill's inception was May 2012, composite and benchmark returns show the performance of the Strategy for the period May 1, 2012 through December 31, 2012. **** Three-year standard deviation for the composite is not shown, as the composite does not have three full years of GIPS® compliant performance data. ***** No dispersion is measured for any years where less than six portfolios were included in the composite for the full year.