

ICA, LLC

Form CRS 6/08/2021

ICA, LLC (ICA) is registered with the Securities and Exchange Commission (**SEC**) as a broker-dealer and is a member of the Financial Industry Regulatory Authority (**FINRA**) and the Securities Investor Protection Corporation (**SIPC**).

ICA REIT offerings are offered to accredited investors as defined in Rule 501 of Regulation D promulgated under the Securities Act, and if necessary, qualified purchasers as defined in Section 2(a)(51) of the Investment Company Act of 1940.

Free and simple tools are available to research firms and financial professionals at [Investor.gov/CRS](https://investor.gov/CRS), which also provides educational materials about broker-dealers and investing.

What investment services and advice does ICA provide an investor?

ICA does not provide investment advice to an investor.

ICA brokerage services are limited to REIT offerings conducted through a private placement on a best-effort's basis. REIT offerings take place on a quarterly basis or as needed.

Prior to each REIT offering, indications of interest emails are sent to prospective investors. Investors participate at their discretion. Offerings are often over-subscribed and there is no guarantee there will be available spots for all investors who indicate interest in participating. ICA employees and family members often participate in each REIT offering. ICA has no account minimums and an investor makes the ultimate decision regarding the purchase of REIT shares.

Account statements are delivered to an investor at least twice per year either in electronic or paper form. Additional statements can be requested at any time.

ICA's affiliate, REIT Investment Group, maintains an ongoing relationship with each REIT and provides administrative services such as maintaining shareholder records, tax reporting, processing and distributing dividend payments, shareholder communication, share transfers and redemptions. ICA does not offer additional services as a broker-dealer.

By selecting to open a brokerage account, an investor understands that ICA is not acting as a fiduciary or making any recommendations in an investors' account.

For additional information, please see finra.org; brokercheck.finra.org; [Investor.gov/CRS](https://investor.gov/CRS); reitinvestmentgroup.com; iroquoiscapitalgroup.com

Conversation Starters: Ask your registered representative:

- *Given my financial situation, should I choose a brokerage service? Why or why not?*
- *How will you choose the investments to recommend to me?*
- *What is your relevant experience, including your licenses, education, and other qualifications? What do these qualifications mean?*

What fees will I pay?

There are no fees or commissions paid by an investor.

You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.

Not applicable to ICA, LLC. Investors do not pay fees.

For additional information, please review this document for pertinent information regarding your fees.

Conversation starters: Ask your financial professional:

- *Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?*

What are your legal obligations to me when providing recommendations? How else does your firm make money and what conflicts of interest do you have?

When we provide you with a recommendation (indication of interest email), as your broker-dealer we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts that can affect the recommendations we provide you. Here is an example to help you understand.

- Registered persons of ICA may invest alongside you in a REIT offering.

Conversation Starter: Ask your financial professional:

- *How might your conflicts of interest affect me, and how will you address them?*

For additional information, please see the information included in this form.

How do your financial professionals make money? – ICA is not paid fees or commissions from investors. REIT Investment Group is paid by each REIT for administrative services to obtain and maintain the REIT 100-shareholder requirement. Our financial professionals are compensated by REIT Investment Group and parent company Iroquois Capital Group by salary and a bonus if applicable.

Do your financial professionals have a legal or disciplinary history? – No.

Please visit [Investor.gov/CRS](https://www.investor.gov/CRS) for a free and simple search tool to research us.

Conversation Starter: As your financial professional

- *As a financial professional, do you have any disciplinary history? For what type of conduct?*

For additional information about our services please call us at 615-467-7609 and ask for Maggie Barnhart or email Maggie at mbarnhart@iroquoiscg.com

Conversation Starter. Ask your financial professional—

- *Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?*