

June 24, 2020

Integrated Capital Management, Inc., is an **Investment Advisor** registered with Securities and Exchange Commission. There are differences in using an investment advisor and a brokerage firm. The intention of this document is to help you understand the services we provide as an advisor and help you determine if our services fit your investment needs. Free and simple tools are available to research firms and financial professionals at www.investor.gov/CRS which also provides educational materials about broker-dealers, investment advisers, and investing.

What investment services and advice can you provide me?

We offer investment advisory services to retail investors, and in general we require a \$25,000 minimum dollar amount to maintain an advisory account. Our series of proprietary investment solutions are offered using registered products such as institutional class no-load mutual fund shares, closed-end funds, and Exchange Traded Funds ("ETFs"). We offer discretionary portfolio management services to effect purchases, sales, exchanges, re-balance, reallocation, and other transactions with respect to the managed assets in your account(s). We will monitor your portfolio's performance on an ongoing basis and will rebalance the portfolio as required by changes in market conditions and in your financial circumstances.

Given my financial situation, should I choose an investment advisory service? Why or why not?

How will you choose investments to recommend to me?

What is your relevant experience, including your licenses, education and other qualifications? What do these qualification mean?

What fees will I pay?

Our annual fee for investment management services is based on the market value of your assets under management. Our management fee is billed and payable quarterly in advance based on the value of your account on the last day of the previous calendar quarter. The first quarter's fees will be calculated on a pro rata basis based on the initial value of your portfolio, which means the advisory fee is payable in proportion to the number of days in the quarter for which you are a client. We will deduct our fee directly from your account through the custodian holding your funds. Our fee schedule does not include the following separately billed fees, which we do not receive any part of: mutual fund expenses, trading and custodial costs. These fees will be charged separately, and you are responsible for paying these additional costs. Please refer to our Form ADV Part 2 documents by clicking this link: <https://adviserinfo.sec.gov/firm/summary/149489>

If you participate in our wrap fee program, you will pay our firm a single fee, which includes money management fees and ticket charges. We receive a portion of the wrap fee for our services. You may pay custodial fees, charges imposed directly by a mutual fund, index fund, or exchange traded fund which shall be disclosed in the fund's prospectus, wire transfer fees and other fees and taxes on brokerage accounts and securities transactions. The overall cost you will incur if you participate in our wrap fee program may be higher or lower than you might incur by separately purchasing the types of securities available in the program.

The way we are compensated creates a conflict of interest. The more assets in your investment account, the more fees we collect, therefore we have the incentive to encourage you to increase the assets held in your account.

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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.

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 acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?

“When we act as your investment adviser, we have to 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 with your interest. You should understand and ask about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.”

Our firm has one investment adviser representative that maintains an insurance license for purposes of legacy business. This individual is not actively engaged as an insurance agent and does not receive commission-based compensation. Neither our firm nor this individual solicit insurance products to our clients.

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

How do your financial professionals make money?

Financial professionals at our firm receive a salary for providing services to you. Additionally, they receive a one-time sales bonus on the value of new client account assets that are opened during the quarter.

Do you or your financial professionals have legal or disciplinary history?

“No.” For free and simple search tool to research us and our financial professionals, please visit www.Investor.gov/CRS

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

Please contact Joseph C. Perfilio, CCO for additional information about our investment advisory services and up-to-date information and a copy of the *relationship summary* ([iCM ADV Part 2](#)) at 570.344.0100 or jperfilio@icm-institutional.com

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