



Regulation Best Interest Disclosure

This document is intended to comply with federal securities laws for retail customers (referred to as “you” or “your”) of Tritower Real Estate Capital, LLC (“TREC” “we” or “our”). In this document, you will find information regarding TREC, our obligations, material limitations, costs, risks, and conflicts of interest that may arise when we work together as well as information about how we try to mitigate these concerns.

Our Firm. Tritower Real Estate Capital, LLC (“TREC”) is a broker dealer registered with the Securities and Exchange Commission (“SEC”) and a member of the Financial Industry Regulatory Authority (“FINRA”) and Securities Investor Protection Corporation (“SIPC”).

TREC is a limited broker dealer focused on real estate. We primarily introduce and recommend to accredited investors interests in private real estate investment trusts. These investments are offered by confidential memorandum, usually from issuers sponsored by Tritower Financial Group, LLC (“TFG”). At times, we may recommend offerings related to Rule 1031 exchanges or other private placements from non-affiliated issuers.

Our Obligations. TREC will treat you in a manner consistent with principals of fair dealing and high standards of honesty and integrity. Having a reasonable basis to believe that a recommendation is in the best interest of at least some retail customers, and considering your circumstances based on profile information you provide to us, we may recommend a product to you. In doing so, we shall not place the financial or other interests of TREC or our registered representatives ahead of your interests.

When you purchase privately placed securities through TREC, you are introduced to an issuer and make your transaction directly with the issuer on a subscription basis. In other words, you do not have an account at TREC. TREC does not offer or maintain accounts or provide brokerage or advisory services such as account maintenance or account monitoring. This means that you or someone you designate are solely responsible for deciding whether and how to invest and you monitor your investments and portfolio. It may also be important for you to understand that while we have a best-interest obligation to you, we are not fiduciaries.

Costs. You will not pay fees directly to TREC. Any fees and charges you pay are in conjunction with your investments and described in the associated offering memorandum or prospectus. These fees are specific to a transaction and only paid if you buy securities through TREC, so TREC only makes money if you accept our recommendation. You will pay those product-specific fees and costs whether you make or lose money on your investment(s). Please make sure you understand the fees and costs you will pay as you consider an investment.

Conflicts. When we provide you with a recommendation, we must act in your best interest and not put our interests ahead of your interests. But there are some inherent conflicts between our and your interests. For example:

- TREC receives commissions and fees if you buy a security we recommend.



- TFG owns a non-controlling economic interest in TREC and indirectly sponsors issuers of privately placed products that may be offered to you by TREC. When you purchase a private placement through TREC, TFG may receive fees and TFG may also benefit if TREC receives fees in excess of its expenses and operational reserves.
- TREC pays its representatives a commission when you complete an investment with an issuer. Our representatives are employees of TFG and may also own an interest in TFG, and thus, may receive separate compensation or distributions from TFG.

We try to mitigate these conflicts by enforcing written policies and procedures designed to comply with federal law and regulatory rules specifically intended to, among other things, protect investors like you. We conduct extensive due diligence on every investment we recommend, and we provide comprehensive training for our registered representatives, regardless of their experience or tenure.

Limitations. There is a limited menu of securities from which we make recommendations. A minimum amount is usually required to purchase those securities. These limitations are in addition to eligibility and suitability requirements mandated by law.

Risks. All securities involve risk and you may lose money. Private placements are generally illiquid, may engage in leverage that can increase the risk of loss, are not required to provide periodic pricing or valuation information, may involve complex tax structures and delays in distributing tax information, are not subject to the same regulatory requirements as public investments, and may charge different fees and higher overall fees relative to other investments.

It is important for you to understand that while we undertake reasonable care, there is no guarantee that your investments will be successful or meet your investment goals, or that the securities we recommend will perform as anticipated. Please read carefully all offering materials before making any investments through us.

For more information about TREC and its business, please visit TritowerFinancial.com and review our Form CRS Relationship Summary, also available at brokercheck.com.