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January 12, 2015

OTC Markets Group, Inc
304 Hudson St, 2nd Floor
New York, NY 10013

RE: Adequate Current Information for ICOA, Inc. (ICOA)

OTC Markets Group, Inc.:

This firm has been retained by ICOA, Inc. (the "Issuer") for the purpose of rendering this opinion as to whether there is adequate current information available on the OTC Disclosure and News Service regarding the Issuer and related matters. As such, OTC Markets Group, Inc. ("OTC Markets Group") is entitled to rely on such opinion in determining whether the issuer has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

To begin, I, the undersigned attorney, am a U.S. resident, and my firm has been retained by the Issuer for the purpose of rendering this opinion and related matters. This law firm has been retained for the purpose of reviewing the current information supplied by the Issuer, but may be retained as regular disclosure counsel. Further, I am licensed to practice law in the State of Florida, and this opinion is limited to the laws of the United States. I am permitted to practice before the Securities and Exchange Commission ("SEC") and have not been prohibited from practice thereunder.

In rendering this opinion, I have examined such corporate records and other documents and such questions of law as counsel considered necessary or appropriate for purposes of rendering this opinion, including but not limited to the following documents:

a) Certificate of Incorporation as filed with the Secretary of State of Nevada on September 15, 1983, as Quintonix, Inc., as well as a subsequent Certificate of Amendment filed on March 14, 1985 renaming the Issuer to ICOA, Inc.;

b) Bylaws of the Issuer;

c) Certain resolutions of the board of directors of the Issuer;

d) Certified Shareholder Summary of the Company;

e) Subscription Agreements and other stock issuance documents;

f) The Issuer's filings on Forms 10K and 10Q as filed with the Securities and Exchange Commission up to and including the quarter end period of September 2006;

g) The Issuer's filing of unaudited financial statements on the OTC Disclosure and News Services for the fiscal years ending in December 31, 2012, 2011, 2010, 2009, 2008, 2007, and 2006;

h) The Issuers filing of unaudited financial statements on the OTC Disclosure and News Services for the fiscal year ended December 31, 2013 as posted on the OTC Disclosure and News Services on April 2, 2014, and the unaudited financial statements on the OTC Disclosure and News Services for the quarter ended March 31, 2014 as posted on the OTC Disclosure and News Services on June 16, 2014, the unaudited financial statements for the quarter ended June 30, 2014 as posted on the OTC Disclosure and News Services on August 31, 2014, and the unaudited financial statements for the quarter ended September 30, 2014 as posted on the OTC Disclosure and News Services on January 12, 2015;

i) Affidavits of Officers and Directors of the Issuer with respect to criminal and litigation history;

j) Filings of the Issuer as previously filed with the Securities and Exchange Commission;

k) News releases, website, and other substantive materials which document the operations of the Issuer;

I have assumed that (i) all information contained in all documents reviewed by me is true and correct, (ii) all signatures on all documents reviewed by me are genuine, (iii) all documents submitted to me as originals are true and complete, (iv) all documents submitted to me as copies are true and complete copies of the originals thereof, and (v) each natural person signing any document reviewed by me had the legal capacity to do so. As to matters of fact, I have relied on information obtained from public officials, officers of the Issuer and other sources, and these sources are believed to be reliable.

I have reviewed the Information published by the Issuer on the OTC Disclosure and News Service on and before January 12, 2015, and, after a reasonable investigation, including meeting personally with management and the majority of the directors of the Issuer to discuss the Information, I have no reason to believe that, at the time such Information was published on the OTC Disclosure and News Service, the Information contains an untrue statement of material fact or omits to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading.

It is my opinion that that the Information (i) constitutes "adequate current information" concerning the Issuer's securities and is "available", within the meaning of Rule 144(c)(2) under the United States Securities Act of 1933, as amended, (ii) the Information includes all of the information that a broker-dealer would be required to obtain from the issuer to publish a quotation for such issuer's securities under Rule 15c2-11 under the United States Securities Exchange Act of 1934, as amended, (iii) complies as to form with the OTC Markets Group's Guidelines for Providing Adequate Current Information, which are located on the Internet at www.otcmarkets.com., and (iv) the Information has been posted through the OTC Disclosure and News Service.

Other related matters relating to this opinion as required are as follows:

1) The person responsible for preparation of the unaudited financial statements contained in the Information is Erwin Vahlsing, Jr., the CFO of the Company, and Mr. Vahlsing has an BA in Business Administration with a focus on accounting from The University of Connecticut, an Master Degree in Finance from the University of Rhode Island, and has over 30 years of experience with both private and public corporations.

2) The Issuer's transfer agent is Signature Stock Transfer, Inc. which is registered with the SEC. I relied on information provided to me by the transfer agent in the form of certified lists to confirm the number of outstanding shares set forth in the Information.

3) I have (i) personally met with management and a majority of the directors of the Issuer, (ii) reviewed the Information, as amended, published by the Issuer through the OTC Disclosure and News Service and (iii) discussed the Information with management and a majority of the directors of the Issuer.

4) To the best of my knowledge, after inquiry of management and the directors of the Issuer, neither the Issuer of the securities, any 5% holder of such securities, nor counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or state securities laws.

No person other than OTC Markets Group is entitled to rely on this opinion, and I hereby grant OTC Markets Group full and complete permission and rights to publish this opinion on the OTC Disclosure and News Service for viewing by the public and regulators.

Kind regards,

/s/ Thomas Craft, Jr.
Thomas Craft, Jr., Esq.