



Naples AIS, Inc. (“NAPLES”) Business Continuity Plan

Please be advised that we at NAPLES have developed a Business Continuity Plan (“BCP”) in the event of a Significant Business Disruption (“SBD”). We anticipate a few different kinds of SBDs, internal and external. Internal SBDs affect only our ability to communicate and do business, such as a fire in our building. External SBDs, on the other hand, prevent the operation of the securities markets or the ability of a number of broker/dealer firms to transact business, such as:

- a terrorist attack;
- a hurricane; or
- a wide-scale, regional disruption of some other kind, such as a power outage.

Our response to an external SBD relies more heavily on other organizations and systems which we do not control, than our response to an internal SBD. Because we do not maintain accounts or hold funds or securities for you or our other customers, our BCP is more limited than it would be if we were a full service broker/dealer. However, in the event of an internal or external SBD, if telephone service is available our registered persons will call and assist you and our other customers in accessing information regarding your funds and securities from the REIT or direct participation program in which you and our other customers invested through us. We will also call and assist the other broker/dealers who participated in a selling group for which we served as dealer-manager with regard to the investments of their customers in those REITs and direct participation programs. On our website, www.NaplesAIS.com this information will also be made available.

We rely on the REIT or direct participation program that we sold to deliver the cash distributions from the investment to you and the other investors in the program. Also, because the REIT and direct participation programs we sold usually do not issue certificates to the investors, there are usually no certificates to deliver. If certificates are issued by the REIT or direct participation program, then we rely on the REIT or direct participation program to deliver the certificate to you and the other investors. With respect to any ongoing offering, we receive subscriptions and checks from prospective investors and the broker/dealers which participate in the offering as selling group members, we are Naples AIS, Inc., the dealer-manager, via fax, e-mail, overnight courier service and mail.

If an SBD, either internal or external, occurs during an ongoing offering then we will continue to receive subscriptions and checks through any of those methods that are available and reliable. As communications permit, we will inform prospective investors and the broker/dealers what options they have to send their subscriptions and checks to us. Notwithstanding the above, during an SBD, you and the broker/dealer may be directed by us to send the subscriptions and checks directly to the escrow agent and/or issuer if the minimum subscriptions have been received. The escrow agent or issuer will then copy the subscription agreements and checks and send the copies to us, by whatever means is available, for a suitability determination and processing.

It is difficult to estimate how long it will take us to recover from SBDs of varying intensities (such as a significant disruption to our building, our business district, our city, or the whole region in which we are situated) and resume business. However, we do intend to stay in business. Our BCP covers many areas of our business (1), including our emergency contact person, who is the undersigned.

If you have any questions concerning our BCP, or would like to receive a copy of it, please contact the undersigned.

Sincerely,

Naples AIS, Inc.

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(1) Other areas of our business covered by our BCP include firm policy, business description, office locations, alternative physical location(s) of employees, customers' access to funds and securities, data back-up and recovery (hard copy and electronic), financial and operational assessments, mission critical systems, alternate communications between the Firm and customers, employees, and regulators, critical business constituents, banks and counter-parties, regulatory reporting, disclosure of Business Continuity Plan to customers, updates, and annual review of our BCP.