To whom it may concern;

I appreciate the opportunity to comment on the proposed changes.

My major concern with the proposed changes is in regards to imposing a 10% concentration limit on an investors liquid net worth. You state that "*Direct participation programs shall include REITs, business development companies, oil and gas programs, equipment leasing programs, commodity pools, and other programs of similar nature providing flow through tax benefits regardless of the industry represented or any combination*". Our advisors and their clients work on complex investment strategies, that sometimes include multiple direct participation investments and imposing the 10% concentration limit would directly impact our clients and not be in their best interest. For example we work with investors who utilize Delaware Statutory Trust (DST) investments where they could have all of their net worth invested in real estate. They use this strategy to defer taxes through a 1031 exchange until their beneficiaries receive the investment with a stepped up cost basis. With the 10% concentration limit, the proposed changes would contradict the best interests of our investors. Also, we have seen a lot of market volatility over the last few years with traditional investments. Direct participation programs are offered to investors to diversify their investment portfolio with assets that are non-correlating to traditional investments. The decision to invest in REITs/Direct Participation Programs should be made by the investor once they have been given all of the information regarding the investment and all the potential risks (including concentration).

Thank you,

Adam W.