

EXHIBIT 18B - MITIGATION PLAN

August 10, 2011

Re: Nord du Lac Commercial Park

To Whom It May Concern:

The Nord du Lac development site has received a final wetlands jurisdictional determination from the Corps of Engineers. A significant amount of the jurisdictional wetlands have been permitted to make way for roadway and drainage infrastructure, and for the improvement of parcels of land that are being placed into commerce. The remaining land being offered includes some jurisdictional wetlands, but without site development information on this land, the wetland permitting process has yet to be started. As an intended site plan for various portions of the remaining land arise, the permitting process will begin.

The mitigation process includes presenting a conceptual site plan for land improvement, preliminary drainage plans, and a cross section analysis that indicate the wetlands that are to be impacted, and the amount of fill material that is to be placed across the site. This information will be prepared in the format required by the Corps of Engineers and submitted for processing. As part of the Corps approval of the 404 Permit, a mitigation plan is determined that specifies the acreage and type of wetlands that must be acquired through an approved mitigation bank. The developer of Nord du Lac will contract with an approved mitigation bank and secure the necessary acreage. Funding for the permitting and mitigation will be by the developer.

With Regards,

ALL STATE FINANCIAL COMPANY

Bruce Wainer