



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

February 2, 2021

Jeffrey S. Beebe  
Chief Executive Officer  
RealtyInvest NNN, LLC  
2000 PGA Blvd, Suite 4440  
Palm Beach Gardens, FL 33408

**Re: RealtyInvest NNN, LLC  
Amendment No. 2 to  
Offering Statement on Form 1-A  
Filed January 14, 2021  
File No. 024-11345**

Dear Mr. Beebe:

We have reviewed your amended offering statement and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your offering statement and providing the requested information. If you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your offering statement and the information you provide in response to this comment, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our December 8, 2020 letter.

Amendment No. 2 to Offering Statement on Form 1-A filed on January 14, 2021

Financial Statements , page F-2

1. Please update your financial statements and financial information in an amended filing. Please refer to Part F/S of Form 1-A.

Jeffrey S. Beebe  
RealtyInvest NNN, LLC  
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You may contact Howard Efron at 202-551-3439 or Jennifer Monick at 202-551-3295 if you have questions regarding comments on the financial statements and related matters. Please contact Jonathan Burr at 202-551-5833 or Maryse Mills-Apenteng at 202-551-3457 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction