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May 23, 2024

VIA NASAA EFD

Mr. Kevin Armato  
NYS Department of Law  
Investor Protection Bureau  
28 Liberty Street, 21<sup>st</sup> Floor  
New York, New York 10005

**Re: AKT Franchise SPV, LLC (the "Company")  
AKT Franchise Program | EFD File No. 479118  
Response to Comment Letter**

Dear Mr. Armato:

In response to your comment letter dated April 26, 2024, we offer the following response on behalf of the Company:

**Comment #1:** Item 3: Update the status of each litigation case listed. Additionally, include details of any new actions, particularly those of an administrative nature, which have emerged since the filing of this Franchise Disclosure Document (FDD).

**Response:** No change is required to Item 3 at time this because the Company is not aware of any matters that have risen to the level of an administrative action nor is the Company aware of any instance in which any state or federal administrator has alleged that the Company has violated any franchise, antitrust or securities law or has engaged in any fraud, unfair or deceptive practices, or made any comparable allegations.

We have submitted PDF copies of the following documents via email: (1) black-lined pages reflecting all changes made to the FDD since our most recent submission, including changes requested by other states; (2) an entire clean copy of the revised FDD; and (3) this cover letter.

Should you have any questions or comments, please do not hesitate to contact me.

Very truly yours,

CHENG COHEN LLC

A handwritten signature in blue ink, appearing to read "V. Frantz".

Vincent M. Frantz

Attachments