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May 30, 2024

Rebecca Brubaker
Minnesota Department of Commerce
Securities Section
85 7th Place East, Suite 280
Saint Paul, MN 55101

Re: File No. 9636/ SVN INTERNATIONAL CORP

Dear Ms. Brubaker:

This letter is in response to your comment letter dated May 10, 2024.

Per your request, in Item 19, we revised the table to include the range of dates (i.e., Years 2011 - 2020) from which the data was collected.

We also made changes to Item 11 and Item 19 per a Maryland examiner's comment letter. Those changes are included in the marked pages that we are submitting with this letter.

Enclosed please find the following:

- Marked pages showing all changes made to the SVNIC FDD per your request and those changes requested by the Maryland Examiner; and
- A clean copy of the revised pages only.

Should you have any questions regarding the documents submitted or should you require additional information, please contact me.

Sincerely,

Tim Pickwell

Tim Pickwell
Certified Specialist
Franchise & Distribution Law
State Bar of California Board of Legal Specialization