



Drummlaw

H. Michael Drumm
mike@drummlaw.com

14656 W 56TH DRIVE
ARVADA, CO 80002

P 720.257.9060
F 720.310.2025
WWW.DRUMMLAW.COM

April 25, 2018

Ms. Flora Angui
Commerce Analyst 2
Securities Registration & Enforcement Section
Minnesota Department of Commerce
85th 7th Place East, Suite 280
St. Paul, MN 55101

Re: Deficiency Notification Response - Inta Juice Franchising LLC, F-8411

Dear Ms. Angui:

We are in receipt of your comment letter regarding Inta Juice Franchising LLC (“Franchisor”) dated December 26, 2017. We made the following revisions to the FDD in accordance with your correspondence:

1. A corrected copy of the Franchisor’s Costs and Sources of Fund document is included with this response.
2. We have revised Item 8 to state none of Franchisor’s officers own an interest in any supplier, as requested.
3. The FDD has been updated with audited financial statements, as of December 31, 2017, as requested.
4. Per your request, enclosed is a copy of the License Agreement between Inta Juice Franchising LLC’s affiliate, Inta Juice Acquisitions, LLC, and Shindelar Enterprises, Inc. Also included are two Extension Amendments to the License Agreement.

We also want to note that the Minnesota Department of Commerce reviewed this License Agreement in 2012. Enclosed for your convenience is a copy of the correspondence sent by Deborah Knooihuizen on behalf of the Minnesota Department of Commerce to Inta Juice Acquisitions, LLC’s counsel at that time, closing its file following its inquiry and review of the License Agreement.

We trust that the enclosed materials are sufficient to respond to your comment letter request. Thank you.

5. Please note the Franchisor has further revised its FDD to correct its fiscal year end to December 31 and has updated the FDD so that all information is current as of December 31, 2017. An updated Consent of Auditor is also included.

We have enclosed marked pages reflecting the requested changes to the FDD and a complete, clean copy of the updated FDD. If you have any questions or comments, please contact the undersigned. Thank you, in advance, for your assistance.

Sincerely,

Drumm Law, LLC



H. Michael Drumm

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