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September 25, 2013

VIA OVERNIGHT COURIER

Ms. Shohreh Aram
Department of Business Oversight
320 West 4th Street, Suite 750
Los Angeles, California 90013

RECEIVED BY MAIL DELIVERY

SEP 26 2013

Dear Ms. Aram:

On behalf of our client, **ZAAZ Franchise & Branding, LLC ("ZFB")** [File No. 993-6895 - **Kiosks**], and in response to your e-mailed comment letter regarding ZFB's pending California franchise registration application, please consider the following:

1. In response to your first comment, enclosed is an updated auditor's consent that relates to ZFB's franchise disclosure document for kiosk franchises ("FDD").

2. In response to your second comment, we modified Item 1 of the FDD to list the franchisor's own agent for service of process. However, we do not prepare multi-state FDDs for ZFB (or our other clients) and as a matter of practice we do not therefore include the List of Agents for Service of Process commonly found in multi-state disclosure documents. The FDD filed with your agency is state specific and the applicable agent for service of process in California is listed in Item 1. We do list the state franchise administrators in an exhibit to the FDD as required by the FTC rule.

3. In response to your third comment, we modified Item 12 of the FDD accordingly.

We made another minor revision to Item 17u of the FDD. Enclosed are (i) complete clean copy of the FDD text that was revised and (ii) copies of all revised pages, marked to show changes.

Please notify us when the registration has been granted, or of any additional comments or questions you have.

Very truly yours,

A handwritten signature in black ink, appearing to read "Don M. Drysdale", written over a horizontal line.

DON M. DRYSDALE

Enclosures

cc: Mr. Raymond Perry
Mr. Lou Franson

LENNING & CO., INC.
CERTIFIED PUBLIC ACCOUNTANTS

18377 Beach Blvd., Ste. 211
Huntington Beach, CA 92648
(714) 893-0646
Fax (714) 596-7152

CONSENT OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

To Whom It May Concern:

We consent to the use in the Franchise Disclosure Document issued by ZAAZ Franchise & Branding, LLC on September 18, 2013, as it may be amended, of our report dated June 6, 2013, relating to the financial statement of Franchisor for the period ending May 23, 2013.

September 18, 2013

Lenning & Co. Inc.

ITEM 1: THE FRANCHISOR, AND ANY PARENTS, PREDECESSORS, AND AFFILIATES

To simplify the language, this disclosure document uses "ZFB", "we" or "us" to mean ZAAZ Franchise & Branding, LLC. We are the franchisor for the ZAAZ system. "You" or "your" means the individual, corporation or other entity who buys the ZAAZ kiosk franchise.

The Franchisor, Parents and Affiliates

ZFB is the franchisor for the ZAAZ system. Our principal business address is 650 Town Center Drive, Suite 1400, Costa Mesa, California 92626.

Our parent entity is TovLi Holdings, Inc. ("THI"). Its principal business address is 2000 Smith Street, Houston, Texas 77002.

Our affiliated company MOTEK Supply Co. ("MSC") is the primary supplier of WBV machines and other products and equipment to ZAAZ kiosk franchisees. The principal business address of MSC is 2000 Smith Street, Houston, Texas 77002. MSC does not offer franchises in any line of business.

Otherwise, we are not controlled by, controlling, or under common control with any other entity that provides goods or services to our franchisees or that offers franchises in any line of business.

Predecessors

We have no predecessors, but an affiliated company, 10 Minute Fitness, Inc. ("TFI"), owns and operates 2 ZAAZ whole body vibration ("WBV") studios in Marin County, California (994 4th Street, San Rafael, California and 1640 Tiburon Boulevard, Tiburon, California). The principal business address of TFI is 3 Harbor Drive, Suite 112, Sausalito, California 94965. This company does not offer franchises in any line of business and does not provide goods or services to our franchisees.

Name Used by the Franchisor

We conduct business under the names "ZAAZ" and "ZAAZ Studios". We do not intend to use any other names to conduct business.

Agent for Service of Process

Our agent for service of process in California is the Commissioner of Corporations, 320 West 4th Street, Suite 750, Los Angeles, California 90013. Our own agent for service of process is Don M. Drysdale, whose address is 650 Town Center Drive, Suite 1400, Costa Mesa, California 92626.

Business Organization Used by the Franchisor

We are a limited liability company organized in Delaware on April 30, 2013.

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