



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

DIVISION OF  
CORPORATION FINANCE

December 19, 2016

Via E-mail

Mr. Brian Pappas  
FranVentures, LLC  
796 Cypress Crossing Trail  
St. Augustine, FL 32095

**Re: Creative Learning Corporation  
Revised Preliminary Proxy Statement on Schedule 14A  
Filed December 19, 2016 by FranVentures, LLC, Brian Pappas, Christine H.  
Pappas, Walter Ramsley, Mark D. Shaw and David K. Waldman  
File No. 000-52883**

Dear Mr. Pappas:

We have reviewed your filing and have the following comment.

1. We note your response to prior comment 3. Where you disclose that the Proposals will become effective upon receiving the consent of a majority of outstanding voting securities on pages 1 and 6, please revise to also disclose that the Company's bylaws include a provision which appears to require the unanimous consent of shareholders to the Removal Proposal to effect the Election Proposal in the manner contemplated in the consent statement.

Please contact me at (202) 551-3589 if you have any questions regarding our comment.

Sincerely,

/s/ Tiffany Piland Posil

Tiffany Piland Posil  
Special Counsel  
Office of Mergers and Acquisitions

cc: Via E-mail  
Thomas J. Fleming, Esq.  
Olshan Frome Wolosky LLP