



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

DIVISION OF  
INVESTMENT MANAGEMENT

November 17, 2020

*VIA E-mail*

Stanley Howard  
CEO, President  
Stanley Howard Enfranchise Inc.  
1705 Elston Street  
Philadelphia, PA 19126

Re: Stanley Howard Enfranchise Inc. File No. 811-23370

Dear Mr. Howard:

We have reviewed the registration statement for Stanley Howard Enfranchise Inc., filed on Form N-8B-4 with the Securities and Exchange Commission on September 30, 2019. Our preliminary review of your filing indicates that it fails to comply with the requirements of the Investment Company Act of 1940, the related rules and regulations, and the requirements of the form. Because of these serious deficiencies, you should not assume that your filing may be relied upon for compliance with the federal securities laws. We urge you to promptly correct these deficiencies or deregister<sup>i</sup> the investment company created by this filing.

Sincerely,

/s/ Deborah L. O'Neal

Deborah L. O'Neal  
Senior Counsel

cc: Keith A. OConnell, Branch Chief  
Michael J. Spratt, Assistant Director

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<sup>i</sup> To deregister the investment company, submit a completed Form N-8F, available at <https://www.sec.gov/files/formn-8f.pdf>. See also IM Guidance Update 2014-05 - Deregistration of Investment Companies: Applications on Form N-8F (April 2014), available at <https://www.sec.gov/investment/im-guidance-2014-05.pdf>.