



DIVISION OF
CORPORATION FINANCE

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

April 18, 2019

Bridgette Roman
General Counsel
CCF Holdings LLC
6785 Bobcat Way
Suite 200
Dublin, OH 43016

**Re: CCF Holdings LLC
Amendment No. 1 to
Draft Registration Statement on Form S-1
Submitted April 8, 2019
CIK No. 0001766682**

Dear Ms. Roman:

We have reviewed your amended draft registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to these comments and your amended draft registration statement or filed registration statement, we may have additional comments.

Amendment No. 1 to Draft Registration Statement

Summary

Our Company, page 1

1. We note your response to comment 2 and reissue in part. Please revise to include a discussion of the Predecessor's reported losses in the periods covered by this registration statement. Please include a similar discussion in Risk Factors.

Selected Consolidated Financial Data, page 9

2. Please revise your next amendment to correct the typo in the line item entitled 'Caproate Expenses' to properly label as 'Corporate Expenses.'

Business

Products and Services

Consumer Loans, page 77

3. We note your added disclosure in response to comment 7 that the principal amount offered to customers is determined by state law. For the short-term loans, please revise to clarify whether you offer the maximum amount permitted by state law in each instance, or whether you perform any evaluation of the customer's circumstances on your own. For the medium-term consumer loans, we reissue our request that you please describe the sources of collateral that you will accept.

Index to Financial Statements

Notes to Consolidated Financial Statements

Note 2. Finance Receivables, Credit Quality and Allowance for Loan Losses, page F-23

4. We have reviewed your response to Comment 14 in our letter dated February 28, 2019. Please provide the following disclosures pursuant to ASC 310-10-50 for both secured and unsecured short-term and medium-term consumer loan classes as detailed below:
 - ASC 310-10-50-6 through 50-7A for past due and nonaccrual financing receivables;
 - ASC 310-10-50-11A through 50-11B for the allowance for credit losses;
 - ASC 310-10-50-14A through 20 for impaired loans; and
 - ASC 310-10-50-27 through 30 for credit quality information.

Note 6. Pledged Assets and Debt , page F-30

5. Please tell us, and revise your next amendment, to explain the statement on page F-32 that, *"The extinguishment of the Senior secured notes on December 12, 2018, resulted in \$2,374 in accelerated amortization of remaining deferred financing costs and bond discount. This amount is not reflected in either the Predecessor or Successor consolidated statement of operations, but instead are presented "on the black line".* In addition, address this similar statement on page F-35 in the context of the accelerated amortization of deferred financing costs for the subsidiary notes.
6. Please tell us, and revise your next amendment, to disclose how you determined the fair value discount on the Senior PIK Notes, including any specific assumptions, estimates, etc. used in determining the discount.

Bridgette Roman
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You may contact Christina Harley at 202-551-3695 or David Irving at 202-551-3321 if you have questions regarding comments on the financial statements and related matters. Please contact Erin Purnell at 202-551-3454 or Michael Clampitt at 202-551-3434 with any other questions.

Sincerely,

Division of Corporation Finance
Office of Financial Services