



DIVISION OF  
CORPORATION FINANCE

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

March 16, 2022

Garo Kholamian  
Principal Executive Officer  
GK Investment Property Holdings II LLC  
257 East Main Street, Suite 200  
Barrington, IL 60010

**Re: GK Investment Property Holdings II LLC  
Post Qualification Amendment on Form 1-A  
Filed March 8, 2022  
File No. 024-11074**

Dear Mr. Kholamian:

This is to advise you that we do not intend to review your amendment.

We will consider qualifying your offering statement at your request. If a participant in your offering is required to clear its compensation arrangements with FINRA, please have FINRA advise us that it has no objections to the compensation arrangements prior to qualification.

We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Catherine De Lorenzo at 202-551-4079 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Rhys James, Esq.