



DIVISION OF
CORPORATION FINANCE

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

September 23, 2021

Teresa McWilliams
Chief Financial Officer
Aluf Holdings, Inc.
4801 South University Drive, Suite 227
Fort Lauderdale, FL 33328

Re: Aluf Holdings, Inc.
Post-Effective Amendment to Form 1-A
Filed September 23, 2021
File No. 024-11592

Dear Ms. McWilliams :

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 Austin Pattan, Law Clerk, at (202) 215-1319 or Jan Woo, Legal Branch Chief, (202) 551-3453 with any questions.

Sincerely,

Division of Corporation Finance
Office of Technology

cc: John E. Dolkart Jr.