



DIVISION OF  
CORPORATION FINANCE

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

March 17, 2017

T. Greenlee Flanagin  
President  
Security Land & Development Corporation  
2816 Broad Street, 7<sup>th</sup> Floor  
Augusta, GA 30901

**Re: Security Land & Development Corporation  
Schedule TO-I/A and Schedule 13E-3/A filed March 16, 2017  
File No. 005-44752**

Dear Mr. Flanagin:

We have reviewed your amended filing and have the following additional comments:

Schedule 13E-3/A

1. You have added multiple new filing persons on the Schedule 13E-3 in response to our first comment letter. Those new filers must sign the Schedule 13E-3 in their individual capacities. Please revise.
2. See our last comment above. The Offer to Purchase must include all of the disclosure required by Schedule 13E-3 as to the new individual filers. For example, each filer must express a view as the fairness of the transaction to unaffiliated shareholders, and must describe his or her fairness analysis or may adopt the fairness analysis of another individual or entity (such as the issuer).

Please contact me at (202) 551-3263 with any questions about this letter.

Sincerely,

/s/ Christina Chalk

Christina Chalk  
Senior Special Counsel  
Office of Mergers & Acquisitions

cc: Mark S. Burgreen, Esq. (via email)