

**OMEGA HEALTHCARE INVESTORS, INC.**  
200 International Circle, Suite 3500  
Hunt Valley, Maryland 21030

June 15, 2015

**VIA EDGAR**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Rahul Patel

Re: **Omega Healthcare Investors, Inc.**  
**Registration Statement on Form S-4 filed April 16, 2015 and pre-effective**  
**amendment thereto filed June 15, 2015**  
**Registration No. 333-203447**

Ladies and Gentlemen:

Pursuant to Rule 461 under the Securities Act of 1933, as amended, and in connection with the captioned registration statement (the "Registration Statement"), Omega Healthcare Investors, Inc. (the "Company") and the subsidiary guarantors described in the Registration Statement (the "Subsidiary Guarantors") hereby request that the Registration Statement be permitted to become effective on June 17, 2015 at 9:00 a.m., Eastern Time, or as soon thereafter as practicable.

In requesting acceleration of effectiveness of the Registration Statement, the Company and the Subsidiary Guarantors acknowledge that:

(i) should the Securities and Exchange Commission (the "Commission") or its staff (the "Staff"), acting pursuant to delegated authority, declare the filings effective, it does not foreclose the Commission from taking any action with respect to the filings;

(ii) the action of the Commission or the Staff, acting pursuant to delegated authority, in declaring the filings effective, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filings; and

(iii) the Company and the Subsidiary Guarantors may not assert staff comments and the declaration of effectiveness as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

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If you have any questions or comments, please do not hesitate to contact me at (410) 427-1722 or Terence A. Childers, Esq. at (404) 572-6820.

**OMEGA HEALTHCARE INVESTORS, INC.**  
**AND THE SUBSIDIARY GUARANTORS**

By: /s/ Robert O. Stephenson  
Robert O. Stephenson  
Chief Financial Officer

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