

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

DIVISION OF CORPORATION FINANCE

April 18, 2017

<u>Via E-Mail</u> Lori A. Gelchion Rogers & Hardin LLP 1700 International Tower 229 Peachtree Street NE Atlanta, GA 30303

Re: Security Land & Development Corporation Schedule TO-T filed on April 7, 2017 Filed by AB Value Partners, LP and AB Opportunity Fund, LLC File No. 5-44752

Dear Ms. Gelchion:

The Office of Mergers and Acquisitions has reviewed the filings listed above. Our comments follow. All defined terms have the same meaning as in the Offer to Purchase included as Exhibit 99(A)(1)(A) to the Schedule TO-T.

Please respond to this letter by revising your filing, by providing the requested information, or by advising us when you will provide the requested response. 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 any amendment to your filing and the information you provide in response to these comments, we may have additional comments.

Offer to Purchase - General

1. Refer to General Instruction C of Schedule TO. Please provide the information required by Item 3 and 5-8 of Schedule TO for the control persons and entities specified.

Cover Page

2. While you are not required to distribute the offer materials into any foreign jurisdiction, tenders must be accepted from all shareholders wherever located. See Rule 14d-10 and guidance in Release No. 33-8957 (September 19, 2008). Please revise on the cover page and the disclosure under "Miscellaneous" on page 23 accordingly.

Lori Gelchion, Esq. Rogers & Hardin LLP April 18, 2017 Page 2

Background of the Offer, page 18

3. Expand this section to specify the number of shares and the proposed purchase price offered by ABVM in March 2017.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable Exchange Act rules require. Since the filing persons are in possession of all facts relating to their disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

If you have any questions regarding these comments or your filings in general, please feel free to contact me at (202) 551-3263.

Sincerely,

/s/ Christina Chalk

Christina Chalk Senior Special Counsel Office of Mergers and Acquisitions