



DIVISION OF  
CORPORATION FINANCE

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

July 23, 2019

Patrick Harkleroad  
Chief Financial Officer  
Chanticleer Holdings, Inc.  
7621 Little Avenue, Suite 414  
Charlotte, NC 28226

**Re: Chanticleer Holdings, Inc.**  
**Form 10-K for the Year Ended December 31, 2018**  
**Form 8-K furnished May 15, 2019**  
**File No. 001-35570**

Dear Mr. Harkleroad:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Transportation and Leisure