

October 30, 2024

VIA EDGAR

United States Securities and Exchange Commission  
Division of Corporation Finance  
Office of Trade & Services  
100 F Street, NE  
Washington, D.C. 20549  
Attention: Nasreen Mohammed  
Adam Phippen

Re: **The ONE Group Hospitality, Inc.**  
**Form 10-K for the Fiscal Year ended December 31, 2023**  
**Response Dated October 4, 2024**  
**File No. 001-37379**

Ladies and Gentlemen:

The ONE Group Hospitality, Inc., a Delaware corporation (the “**Company**”, “**we**” or “**our**”), submits to the staff (the “**Staff**”) of the Securities and Exchange Commission (the “**Commission**”) this letter setting forth the Company’s response to the comments contained in the Staff’s letter dated October 18, 2024 to Mr. Tyler Loy (the “**Comment Letter**”), regarding the Company’s Form 8-K filed August 6, 2024. The headings and numbered items in this letter correspond to the headings and numbered items in the Comment Letter. For the Staff’s convenience, we have repeated below the Staff’s comments in bold and have followed such comments with the Company’s response.

**Form 8-K filed August 6, 2024**

**Highlights for second quarter 2024 compared to the same quarter in 2023**

1. **We note your response to prior comments 1 and 3 and reissue comment 3, in part. Net income does not appear to be the most directly comparable measure to Restaurant Operating Profit and Restaurant Operating Profit Margin. Please present the most directly comparable GAAP measures with equal or greater prominence. Refer to Question 102.10 of the Non-GAAP Financial Measures Compliance and Disclosure Interpretations.**

**Response:** The Company respectfully acknowledges the Staff’s comment and advises the Staff that we have considered the guidance in Question 102.10 of the Non-GAAP Financial Measures Compliance and Disclosure Interpretations. In response to the Staff’s comment, the Company will revise its future materials furnished to or filed with the Commission, beginning with its earnings release for the third quarter ending September 30, 2024, to present operating income, the most directly comparable GAAP financial measure, with equal or greater prominence to Restaurant Operating Profit and Restaurant Operating Profit Margin.

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We appreciate the opportunity to respond to your comments. Please contact Steven Hull of Stoel Rives LLP at (503) 294-9122 with any questions or further comments regarding the responses to the Staff’s comments.

Sincerely,

By: /s/ Tyler Loy  
Name: Tyler Loy  
Title: Chief Financial Officer

CC: Steven H. Hull, Stoel Rives LLP

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STEAKHOUSE

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