



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

DIVISION OF
CORPORATION FINANCE

Mail Stop 3233

October 16, 2018

Via Email

Mr. Mi Yong Jun
Chief Financial Officer
Sunrise Real Estate Group, Inc.
No. 638, Hengfeng Road
5A11 Floor, Building A
Shanghai, PRC 200070

**Re: Sunrise Real Estate Group, Inc.
Form 10-K
Filed May 15, 2018
Form 10-Q
Filed August 14, 2018
File No. 000-32585**

Dear Mr. Mi:

We have completed our review of your filings. 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,

/s/ Kevin Woody

Kevin Woody
Branch Chief
Office of Real Estate and
Commodities

Cc: Bryan Lin (via email)
Steven Schuster (via email)