



DIVISION OF  
CORPORATION FINANCE

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

November 10, 2011

Via E-Mail

Mr. Mark S. Robinow  
Chief Financial Officer  
Kona Grill, Inc.  
7150 East Camelback Road, Suite 220  
Scottsdale, Arizona 85251

**Re: Kona Grill, Inc.**  
**Form 10-K for the year ended December 31, 2010**  
**Filed March 11, 2011**  
**Definitive Proxy Statement on Schedule 14A**  
**Filed March 14, 2011**  
**File No. 001-34082**

Dear Mr. Robinow:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Linda Cvrkel

Linda Cvrkel  
Branch Chief