



DIVISION OF
CORPORATION FINANCE

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

May 12, 2011

VIA U.S. MAIL

Ki Nam
Chief Executive Officer
T3 Motion, Inc.
2990 Airway Avenue, Suite A
Costa Mesa, CA 92626

**Re: T3 Motion, Inc.
Amendment No. 8 to the Registration Statement on Form S-1
Filed May 9, 2011
File No. 333-171163**

Dear Mr. Nam:

We have reviewed your response to our letter dated May 6, 2011 and have the following additional comments.

General

1. We note your response to prior comment 1 and reissue. We continue to believe that the agreements with \$500,000 Investors should be registered as separate securities. Alternatively, the negative covenants could form part of the terms of a separate class of warrants issued to the \$500,000 Investors. Please amend your registration statement accordingly. Additionally, please have counsel revise the legal opinion to cover the separate securities.

You may contact Heather Clark at (202) 551-3624 or Jean Yu at (202) 551-3305 if you have questions regarding comments on the financial statements and related matters. Please contact J. Nolan McWilliams at (202) 551-3217 or me at (202) 551-3750 with any other questions.

Sincerely,

Max A. Webb
Assistant Director

cc: Via facsimile (424) 239-1882
Ryan S. Hong, Esq.