



DIVISION OF
CORPORATION FINANCE

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

February 18, 2022

Everett Dickson
Chief Executive Officer
AVRA Inc.
One Glenlake Parkway, #650
Atlanta, Georgia 30328

Re: AVRA Inc.
Post-Qualification Amendment No. 1 to Offering Statement on Form 1-A
Filed February 14, 2022
File No. 024-11691

Dear Mr. Dickson:

This is to advise you that we do not intend to review your amendment.

We will consider qualifying your offering statement at your request. If a participant in your offering is required to clear its compensation arrangements with FINRA, please have FINRA advise us that it has no objections to the compensation arrangements prior to qualification.

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.

Please contact Gregory Herbers at 202-551-8028 with any questions.

Sincerely,

Division of Corporation Finance
Office of Manufacturing