



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3233

February 23, 2017

Via E-Mail

Jeffrey K. Waldvogel  
Chief Financial Officer  
KBS Strategic Opportunity REIT II, Inc.  
800 Newport Center Drive, Suite 700  
Newport Beach, CA 92660

**Re: KBS Strategic Opportunity REIT II, Inc.**  
**Form 10-K**  
**Filed March 22, 2016**  
**File No. 000-55424**

Dear Mr. Waldvogel:

We have completed our review of your filing. 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/ Wilson K. Lee

Wilson K. Lee  
Senior Staff Accountant  
Office of Real Estate  
and Commodities