



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3561

June 15, 2017

Storm Sondors  
Chief Executive Officer  
Sondors, Inc.  
23823 Malibu Road, Suite 50 #129  
Malibu, CA 90265

**Re: Sondors, Inc.**  
**Draft Offering Statement on Form 1-A**  
**Submitted May 19, 2017**  
**CIK No. 0001704419**

Dear Mr. Sondors:

We have reviewed your draft offering statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting an amended draft offering statement or publicly filing your offering statement on EDGAR. Please refer to Rule 252(d) regarding the public filing requirements for non-public submissions, amendments and correspondence. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response. After reviewing your amended draft offering statement or filed offering statement and the information you provide in response to these comments, we may have additional comments.

Part I

Item 4. Summary Information Regarding the Offering and Other Proposed Offerings

1. Please tell us why you indicate here that you are not offering the securities on a continuous basis under Rule 251(d)(3)(i)(F).

Offering Circular Cover Page

2. Please quantify in a footnote to the table on the Cover Page the total offering expenses to be borne by the company in connection with the offering. Refer to Instruction 6 to Item 1(e) of Part II to Form 1-A.

Risk Factors, page 4

3. Please add a risk factor to discuss the risks of your reliance on license agreements to conduct your business and, if true, that you will not own any of the electric bikes you intend to sell.

If we cannot raise sufficient funds, we will not succeed or will require significant additional capital infusions, page 4

4. Please clarify here or in a separate risk factor that because this is a best efforts offering with no minimum, any investment in the stock is potentially the only investment in the stock, which could leave the company without adequate capital to pursue its business plan.

We depend on key personnel and consultants, page 5

5. Consistent with your disclosure on page 23, please disclose here or in a separate risk factor that Mr. Sondors does not work exclusively for you and divides his time among various entities which he controls. Please also discuss the potential conflicts that exist as a result of these other commitments, if material.

Limited Transferability and Liquidity, page 8

6. Please briefly discuss the conditions that must be satisfied prior to any sale, transfer, conversion or other disposition of your stock.

Management's Discussion and Analysis of Financial Condition, page 19

7. Please reconcile the disclosure here that you will "design" new models of bikes, with your disclosure on page 4 and elsewhere that the company was formed to market and sell electric bikes under your license agreement.

Interests of Management and Others in Certain Transactions, page 22

8. We note your disclosure that Mr. Sondors periodically advances funds to you. Please disclose any advances that have occurred that are required to be disclosed by Item 13 to Part II of Form 1-A and file the written agreements evidencing these advances as exhibits.

Exhibits, page 23

9. If material, please file the intellectual property rights agreement and license agreement entered into with a related party referenced on page F-12. Refer to Item 17(6) to Part III of Form 1-A.

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Exhibit 11.1

10. In future amendments, please file an auditor consent that contains a conformed signature.

You may contact Abe Friedman at 202-551-8298 or Melissa Raminpour, Accounting Branch Chief, at 202-551-3379 if you have questions regarding comments on the financial statements and related matters. Please contact John Stickel at 202-551-3324 or me at 202-551-3217 with any other questions.

Sincerely,

/s/ J. Nolan McWilliams

J. Nolan McWilliams  
Attorney-Advisor  
Office of Transportation and Leisure