



DIVISION OF  
CORPORATION FINANCE

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

April 1, 2020

John Norman  
Chief Executive Officer  
Evolution Development Group, Inc.  
10949 Esteban Drive  
Ft. Myers, FL 33912

**Re: Evolution Development Group, Inc.**  
**Amendment No. 2 to Offering Statement on Form 1-A**  
**Filed March 30, 2020**  
**File No. 024-11127**

Dear Mr. Norman:

We have reviewed your amended 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 amending your offering statement and providing the requested information. 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 any amendment to your offering statement and the information you provide in response to these comments, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our March 4, 2020 letter.

Amendment No. 2 to Offering Statement on Form 1-A

Part III. Exhibits

Index to Exhibits, page 110

1. Please file the written consent of Kendall Almerico as an exhibit to your offering statement.

John Norman  
Evolution Development Group, Inc.  
April 1, 2020  
Page 2

You may contact Theresa Brilliant at 202-551-3307 or Rufus Decker at 202-551-3769 if you have questions regarding comments on the financial statements and related matters. Please contact Sonia Bednarowski at 202-551-3666 or J. Nolan McWilliams at 202-551-3217 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services