



DIVISION OF  
CORPORATION FINANCE

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

November 9, 2022

Sean Peace  
Manager  
RoyaltyTraders LLC  
1053 East Whitaker Mill Rd., Suite 115  
Raleigh, NC 27604

**Re: RoyaltyTraders LLC**  
**Offering Statement on Form 1-A**  
**Post-Qualification Amendment No. 3**  
**Filed November 3, 2022**  
**File No. 024-11532**

Dear Sean Peace:

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 Patrick Faller, Staff Attorney, at (202) 551-4438, or Jan Woo, Legal Branch Chief, at (202) 551-3453 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology

cc: Andrew Stephenson