



DIVISION OF  
CORPORATION FINANCE

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

October 14, 2022

Andrew Michael Arroyo  
Chief Executive Officer  
Andrew Arroyo Real Estate Inc. d/b/a AARE  
12636 High Bluff Drive, Suite 400  
San Diego, CA 92130

**Re: Andrew Arroyo Real Estate Inc. d/b/a AARE**  
**Post-Qualification Amendment No. 1 to Offering Statement on Form 1-A**  
**Filed October 5, 2022**  
**File No. 024-11640**

Dear Andrew Michael Arroyo:

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 Melanie Singh at 202-551-4074 or Ruairi Regan at 202-551-3269 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Craig V. Butler, Esq.