



DIVISION OF  
CORPORATION FINANCE

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

December 14, 2022

Ming Zhu  
Chief Executive Officer  
Fundhomes 1, LLC  
1700 Westlake Ave. N., Suite 200  
Seattle, WA 98109

**Re: Fundhomes 1, LLC**  
**Amendment No. 4 to Offering Statement on Form 1-A**  
**Filed December 1, 2022**  
**File No. 024-11939**

Dear Ming Zhu:

We have reviewed your amended offering statement and have the following comment. In our comment, 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 comment applies 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 this comment, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our November 14, 2022 letter.

Amended Offering Statement on Form 1-A

General

1. Refer to prior comment 1. Please revise the Summary, Risk Factors and where appropriate to clarify the maximum time period during which investor funds could be held pending a closing without being accepted or rejected. In this regard, we note you retain discretion to terminate the offerings including in the event of the Company not raising enough capital prior to the date on which the property purchase is scheduled to close or the termination of the applicable purchase and sale agreement.

You may contact Howard Efron at 202-551-3439 or Wilson Lee at 202-551-3468 if you have questions regarding comments on the financial statements and related matters. Please

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contact Ruairi Regan at 202-551-3269 or James Lopez at 202-551-3536 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Jason Powell, Esq.