



DIVISION OF  
CORPORATION FINANCE

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

May 22, 2023

Alan Snyder  
Chief Executive Officer  
aShareX Fine Art, LLC  
10990 Wilshire Blvd., Suite 1150  
Los Angeles, California 90024

**Re: aShareX Fine Art, LLC**  
**Amendment No. 2 to Draft Offering Statement on Form 1-A**  
**Submitted May 3, 2023**  
**CIK No. 0001964674**

Dear Alan Snyder:

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 April 10, 2023 letter.

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

General

1. It appears that, via the bidding process, you are soliciting pre-qualification commitments. Though Rule 255 permits certain solicitations of interest, it prohibits the solicitation of “any commitment, binding or otherwise, from any person . . . until qualification of the offering statement.” See Rule 255(a). Please revise the structure of the bid process so that you are in compliance with Regulation A.

Alan Snyder  
aShareX Fine Art, LLC  
May 22, 2023  
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Please contact Alyssa Wall at 202-551-8106 or Donald Field at 202-551-3680 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services

cc: Alison Pear