



DIVISION OF
CORPORATION FINANCE

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

July 23, 2019

John Hartman
CEO and Director
FC Global Realty Inc
15150 North Hayden Road, Suite 235
Scottsdale, AZ 85260

Re: FC Global Realty Inc
Form PRE14C
Filed May 29, 2019
File No. 000-11635

Dear Mr. Hartman:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance
Office of Real Estate and
Commodities