



DIVISION OF  
CORPORATION FINANCE

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

May 17, 2021

Orlando Hernandez  
Chief Executive Officer  
VICTORY MARINE HOLDINGS CORP  
555 NE 34th Street, Suite 1207  
Miami, FL 33137

**Re: VICTORY MARINE HOLDINGS CORP**  
**Offering Statement on Form 1-A**  
**Filed May 12, 2021**  
**File No. 024-11525**

Dear Mr. Hernandez:

This is to advise you that we do not intend to review your offering statement.

We will consider qualifying your offering statement at your request. In connection with your request, please confirm in writing that at least one state has advised you that it is prepared to qualify or register your offering. 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 Jacqueline Kaufman at 202-551-3797 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services