

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

June 14, 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 reviewed your filing and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

PRE14C filed May 29, 2019

General

1. Please revise your filing to provide information responsive to Item 12, Item 13, and Item 14 of Schedule 14A, or tell us why such information is not required. Please refer to Item 1 of Schedule 14C and Note A of Schedule 14A.

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. John Hartman FC Global Realty Inc June 14, 2019 Page 2

Please contact Joshua Lobert, Staff Attorney, at 202-551-7150 or Jennifer Gowetski, Senior Counsel, at 202-551-3401 with any questions.

Sincerely,

Division of Corporation Finance Office of Real Estate and Commodities