

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

DIVISION OF CORPORATION FINANCE

January 29, 2019

Gregory Boden Chief Financial Officer CLOUDCOMMERCE, INC. 1933 Cliff Drive, Suite 1 Santa Barbara, CA 93109

> Re: CLOUDCOMMERCE, INC. Form 10-K for the Transition Period From July 1, 2017 to December 31, 2017 Filed April 13, 2018 File No. 000-13215

Dear Mr. Boden:

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 Consumer Products

cc: Andrew Van Noy