

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

October 28, 2019

Corey Maple Chief Executive Officer Lodging Fund REIT III, Inc. 1635 43rd Street South, Suite 205 Fargo, North Dakota 58103

> Re: Lodging Fund REIT III, Inc. Amendment No. 1 to Form 10-12G Filed September 17, 2019 File No. 000-56082

Dear Mr. Maple:

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 & Construction