



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

DIVISION OF
CORPORATION FINANCE

January 12, 2023

Rick Iler
Principal Executive Officer
Global System Dynamics, Inc.
815 Walker Street
Suite 1155
Houston, TX 77002

Re: Global System Dynamics, Inc.
Preliminary Proxy Statement on Schedule 14A
Filed December 30, 2022
File No. 001-40707

Dear Rick Iler:

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

cc: Scott Doney, Esq.