



DIVISION OF  
CORPORATION FINANCE

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

October 12, 2012

Via E-mail

Wei Lin

Chief Executive Officer and Chairman of the Board of Directors  
Transax International Limited  
South Part 1-101, Nanshe Area  
Pengnan Industrial Park on North Yingbinbei Road  
Waisha Town of Longhu District  
Shantou, Guangdong, China 515023

**Re: Transax International Limited**  
**Form 8-K**  
**Filed January 6, 2012**  
**Form 10-K for the fiscal year ended December 31, 2011**  
**Form 10-Q for the quarter ended March 31, 2012**  
**File No. 000-27845**

Dear Mr. Lin:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Max A. Webb

Max A. Webb  
Assistant Director