



DIVISION OF
CORPORATION FINANCE

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

February 5, 2021

William Kerby
Chief Executive Officer and Chairman
Monaker Group, Inc.
2893 Executive Park Drive, Suite 201
Weston, Florida 33331

Re: Monaker Group, Inc.
Registration Statement on Form S-3
Filed January 29, 2021
File No. 333-252580

Dear Mr. Kerby:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Irene Barberena-Meissner at 202-551-6548 with any questions.

Sincerely,

Division of Corporation Finance
Office of Energy & Transportation

cc: John S. Gillies, Esq.