



DIVISION OF  
CORPORATION FINANCE

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

May 28, 2019

Suren Ajjarapu  
Chief Executive Officer  
Trxade Group, Inc.  
3840 Land O' Lakes Boulevard  
Land O' Lakes, Florida 34639

**Re: Trxade Group, Inc.**  
**Registration Statement on Form S-1**  
**Filed May 6, 2019**  
**File No. 333-231246**

Dear Mr. Ajjarapu:

We have limited our review of your registration statement to those issues we have addressed in our comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

Registration Statement on Form S-1 Filed May 6, 2019

General

1. We note that you plan to incorporate by reference information pursuant to General Instruction VII of Form S-1. However, it appears that the company is a penny stock issuer as defined in Rule 3a51-1 of the Exchange Act and, therefore, is not eligible to use incorporation by reference. Please revise or advise. Please also update your financial disclosure for the quarterly period ended March 31, 2019.

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.

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Refer to Rules 460 and 461 regarding requests for acceleration. Please allow adequate time for us to review any amendment prior to the requested effective date of the registration statement.

Please contact Ronald (Ron) Alper at 202-551-3329 or Brigitte Lippmann at 202-551-3713 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Beverages, Apparel and  
Mining

cc: Blair Krueger, Esq.