



DIVISION OF  
CORPORATION FINANCE

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

June 3, 2019

Bradley Robinson  
Chief Executive Officer  
Predictive Technology Group, Inc.  
2749 Parleys Way, Suite 101  
Salt Lake City, UT 84019

**Re: Predictive Technology Group, Inc.**  
**Registration Statement on Form 10-12G**  
**Filed December 6, 2018**  
**File No. 000-56008**

Dear Mr. Robinson:

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 Manufacturing and  
Construction