



DIVISION OF  
CORPORATION FINANCE

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

November 16, 2020

David Lazar  
Chief Executive Officer  
Zyrox Mining International, Inc.  
1185 Avenue of the Americas, 3rd Floor  
New York, NY 10036

**Re: Zyrox Mining International, Inc.**  
**Registration Statement on Form 10**  
**Filed September 18, 2020**  
**File No. 000-56204**

Dear Mr. Lazar:

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 Life Sciences

cc: Dave Natan