



DIVISION OF  
CORPORATION FINANCE

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

October 31, 2022

Edward E. Jacobs, Jr.  
Chief Executive Officer  
Bioadaptives, Inc.  
2620 Regatta Drive  
Suite 102  
Las Vegas, NV 89128

**Re: Bioadaptives, Inc.  
Amendment No. 1 to Post-Qualification Amendment No. 1 to  
Offering Statement on Form 1-A  
Filed October 28, 2022  
File No. 024-11819**

Dear Edward E. Jacobs:

We have reviewed your amendment and have the following comment.

Please respond to this letter by amending your offering statement and providing the requested information. If you do not believe our comment applies 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 offering statement and the information you provide in response to this comment, we may have additional comments.

Amendment No. 1 to Post-Qualification Amendment No. 1 to Offering Statement on Form 1-A  
Management's Discussion and Analysis of Financial Condition and Results of Operations, page  
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1. We note your revisions in response to prior comment 1 and reissue in part. Please revise this section to discuss your financial condition, changes in financial condition and results of operations for each period for which financial statements are required, including the causes of material changes from period to period in financial statement line items. Refer to Item 303(c) of Regulation S-K.

We will consider qualifying your offering statement at your request. If a participant in your offering is required to clear its compensation arrangements with FINRA, please have FINRA advise us that it has no objections to the compensation arrangements prior to qualification.

Edward E. Jacobs, Jr.  
Bioadaptives, Inc.  
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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.

You may contact Ada Sarmento at 202-551-3798 or Laura Crotty at 202-551-7614 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: J. Stephen Mills, Esq.