



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

DIVISION OF  
CORPORATION FINANCE

November 10, 2020

Yue (Justin) Tang  
Chief Executive Officer and Chairman  
X Financial  
7-8F, Block A, Aerospace Science and Technology Plaza  
No. 168, Haide Third Avenue, Nanshan District  
Sheuzhen, 518067, The People's Republic of China

**Re: X Financial**  
**Form 20-F for the Fiscal Year Ended December 31, 2019**  
**Filed June 4, 2020**  
**File No. 001-38652**

Dear Mr. Tang:

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 Finance