



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

DIVISION OF
CORPORATION FINANCE

May 18, 2021

Thomas Lydon
Chief Financial Officer
APi Group Corporation
1100 Old Highway 8 NW
New Brighton, MN 55112

Re: APi Group Corp
Registration Statement on Form S-3
Filed May 12, 2021
File No. 333-256049

Dear Mr. Lydon:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Ronald (Ron) E. Alper at 202-551-3329 with any questions.

Sincerely,

Division of Corporation Finance
Office of Real Estate & Construction

cc: Flora Perez