



DIVISION OF  
CORPORATION FINANCE

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

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. 333-256050**

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