

UPEXI, INC.
3030 ROCKY POINT DRIVE, SUITE 420
TAMPA, FL 33607

December 3, 2025

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Crypto Assets
100 F Street, N.E.
Washington, DC 20549

Re: Upexi, Inc.
Registration Statement on Form S-1, File No. 333-291879

REQUEST FOR ACCELERATION OF EFFECTIVENESS

Requested Date: December 5, 2025
Requested Time: 3:00 pm, Eastern Time

Ladies and Gentlemen:

Upexi, Inc. (the "Company") hereby requests that the effective date of the Company's Registration Statement on Form S-1, as amended (File No. 333-291879), be accelerated pursuant to Rule 461 under the Securities Act of 1933, as amended, so that it is declared and becomes effective at 3:00 pm Eastern Time on December 5, 2025, or as soon thereafter as possible.

Please contact our counsel Peter Campitiello of Lucosky Brookman LLP at (732) 395-4517 with any questions you may have regarding this request. In addition, the Company requests that you kindly notify Mr. Campitiello by telephone when this request for acceleration has been granted.

Sincerely yours,

UPEXI, INC.

/s/ Allan Marshall

Allan Marshall
Chief Executive Officer