



January 6, 2026

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-3, File No. 333-292366

REQUEST FOR ACCELERATION OF EFFECTIVENESS

Requested Date: January 8, 2026  
Requested Time: 4:30 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-3, as amended (File No. 333-292366), be accelerated pursuant to Rule 461 under the Securities Act of 1933, as amended, so that it is declared and becomes effective at 4:30 pm Eastern Time on January 8, 2026, 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/ Andrew Norstrud*

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Andrew Norstrud  
Chief Financial Officer