



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

DIVISION OF  
CORPORATION FINANCE

December 19, 2018

David G. Watumull  
President and Chief Executive Officer  
Cardax, Inc.  
2800 Woodlawn Drive, Suite 129  
Honolulu, Hawaii 96822

**Re: Cardax, Inc.**  
**Registration Statement on Form S-1**  
**Filed December 14, 2018**  
**File No. 333-228826**

Dear Mr. Watumull:

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 Irene Paik at 202-551-6553 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Healthcare & Insurance

cc: Richard M. Morris, Esq.