



DIVISION OF  
CORPORATION FINANCE

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

October 20, 2014

Via E-mail

Robert Federowicz  
Chief Executive Officer  
Aristocrat Group Corp.  
495 Grand Boulevard, Suite 206  
Miramar Beach, Florida

**Re: Aristocrat Group Corp.  
Registration Statement on Form S-1  
Filed on September 25, 2014  
File No. 333-198947**

Dear Mr. Federowicz:

We have reviewed your filing solely for the issue noted below, and have the following comment.

Please respond to this letter by amending your registration statement and providing the requested information. Where you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

Selling Stockholder, page 24

1. We note the representation that no affiliate of Jaxon Group Corp or John Morrissey has served as an officer or director of your Company within the last three years or has had a material relationship with the Company. Please confirm that your former chief executive officer and director, Cindy Morrissey, is not related to Mr. Morrissey nor otherwise affiliated with the Jaxon Group Corp.

Robert Federowicz  
Aristocrat Group Corp.  
October 20, 2014  
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You may contact Paul Fischer, Attorney-Advisor, at (202) 551-3415, or me at (202) 551-3810, with any questions.

Sincerely,

/s/ Terry French for

Larry Spigel  
Assistant Director

Cc: Robert Sonfield, Jr., Esq.