

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

CORPORATION FINANCE

Mail Stop 3561

June 4, 2018

Ernest C. Garcia, III Chief Executive Officer Carvana Co. 1930 W. Rio Salado Parkway Tempe, Arizona 85281

Re: Carvana Co.

Registration Statement on Form S-3

Filed May 29, 2018 File No. 333-225262

Dear Mr. Garcia:

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 Katherine Bagley at (202) 551-2545 with any questions.

Sincerely,

/s/ Lisa M. Kohl for

Mara L. Ransom Assistant Director Office of Consumer Products