



DIVISION OF  
CORPORATION FINANCE

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

February 13, 2023

Troy Levy  
Chief Executive Officer  
Tropical Racing Inc.  
1740 Grassy Springs Road  
Versailles, Kentucky 40383

**Re: Tropical Racing Inc.  
Post Qualification Amendment No. 2 to Form 1-A  
Filed February 7, 2023  
File No. 024-11454**

Dear Troy Levy:

This is to advise you that we do not intend to review your amendment.

We will consider qualifying your offering statement at your request. If a participant in your offering is required to clear its compensation arrangements with FINRA, please have FINRA advise us that it has no objections to the compensation arrangements prior to qualification.

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 Scott Anderegg at 202-551-3342 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services