

August 20, 2019

**VIA EMAIL AND EDGAR**

U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Paul Fischer, Esq.,  
Division of Corporation Finance

Re: IMAC Holdings, Inc.  
Registration Statement on Form S-1 (No. 333-232820)

Ladies and Gentlemen:

On behalf of IMAC Holdings, Inc. (the "Company"), we enclose the Company's request for acceleration of the above-referenced Registration Statement to 4:30 p.m., Eastern time, on Wednesday, August 21, 2019, or as soon as possible thereafter.

Please advise the undersigned of the effectiveness of the Registration Statement.

Very truly yours,

*/s/ Spencer G. Feldman*

Spencer G. Feldman

cc: Mr. Jeffrey S. Ervin

**IMAC HOLDINGS, INC.**  
1605 Westgate Circle  
Brentwood, Tennessee 37027

August 20, 2019

U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Paul Fischer, Esq.,  
Division of Corporation Finance

Re: IMAC Holdings, Inc.  
Registration Statement on Form S-1 (No. 333-232820)

Ladies and Gentlemen:

IMAC Holdings, Inc. hereby requests that the effectiveness of the above-referenced Registration Statement be accelerated so that it will become effective at 4:30 p.m., Eastern time, on Wednesday, August 21, 2019, or as soon as possible thereafter.

Very truly yours,

IMAC HOLDINGS, INC.

By: /s/ Jeffrey S. Ervin

Jeffrey S. Ervin  
Chief Executive Officer

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