

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

May 6, 2019

Eric Chin Chief Financial Officer Apollo Medical Holdings, Inc. 1668 S. Garfield Avenue, 2nd Floor Alhambra, CA 91801

> Re: Apollo Medical Holdings, Inc. Registration Statement on Form S-3 Filed on April 29, 2019 File No. 333-231109

Dear Mr. Chin:

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 Jennifer Gowetski at 202-551-3401 with any questions.

Sincerely,

Division of Corporation Finance Office of Real Estate and Commodities