

November 19, 2020

Guilherme Dias Fernandes Benchimol
Chief Executive Officer
XP Inc.
Av. Chedid Jafet, 75, Torre Sul, 30th floor,
Vila Olímpia S o Paulo
Brazil 04551-065

Statement on Form F-1
17, 2020

Re: XP Inc.
Draft Registration
Submitted November
CIK No. 0001787425

Dear Mr. Benchimol:

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

We request that you publicly file your registration statement no
later than 48 hours prior
to the requested effective date and time. 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.

Envall at (202) 551-3234 with any questions.

Please contact Eric

Sincerely,

Division of Corporation Finance

Office of Finance