



DIVISION OF  
CORPORATION FINANCE

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

April 16, 2020

Frank Cotroneo  
Chief Financial Officer  
Aspen Group, Inc.  
276 Fifth Avenue, Suite 505  
New York, New York 10001

**Re: Aspen Group, Inc.**  
**Form 10-K for the Fiscal Year Ended April 30, 2019**  
**Filed July 9, 2019**  
**File No. 1-38175**

Dear Mr. Cotroneo:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services