

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

DIVISION OF CORPORATION FINANCE

September 17, 2018

Cameron Reynolds President and Chief Executive Officer VolitionRx Limited 1 Scotts Road #24-05 Shaw Centre Singapore 228208

Re: VolitionRx Limited Registration Statement on Form S-3 Filed September 10, 2018 File No. 333-227248

Dear Mr. Reynolds:

We have limited our review of your registration statement to those issues we have addressed in our comment. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to the comment, we may have additional comments.

Registration Statement on Form S-3

Incorporation of Certain Information by Reference, page 14

1. Please revise this section to incorporate by reference the Form 8-K you filed on March 12, 2018.

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.

Refer to Rules 460 and 461 regarding requests for acceleration. Please allow adequate

Cameron Reynolds VolitionRx Limited September 17, 2018 Page 2

time for us to review any amendment prior to the requested effective date of the registration statement.

Please contact Dorrie Yale at 202-551-8776 or Erin Jaskot at 202-551-3442 with any questions.

Sincerely,

Division of Corporation Finance Office of Healthcare & Insurance

cc: Marc G. Alcser