

DIVISION OF CORPORATION FINANCE

June 1, 2022

Shai Shemesh Chief Financial Officer IM Cannabis Corp. Kibbutz Glil Yam Central District, Israel 4690500

Re: IM Cannabis Corp. Form 40-F filed April 4, 2022 File No. 001-40065

Dear Mr. Shemesh:

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 Life Sciences