

January 13, 2020

Ian Huen
Chief Executive Officer and Executive Director
Aptorum Group Ltd
17th Floor, Guangdong Investment Tower
148 Connaught Road Central
Hong Kong

Re: Aptorum Group Ltd
Registration Statement on Form F-3
Filed January 6, 2020
File No. 333-235819

Dear Mr. Huen:

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 Irene Paik at 202-551-6553 with any questions.

Sincerely,
Division of
Office of Life

Corporation Finance

Sciences

cc: Louis Taubman