

September 28, 2020

Ian Huen  
Chief Executive Officer and Executive Director  
Aptorum Group Ltd  
17 Hanover Square  
London W1S 1BN, United Kingdom

Re: Aptorum Group Ltd  
Amendment No. 2 to  
Filed September 25,  
File No. 333-248743

Registration Statement on Form F-1  
2020

Dear Mr. Huen:

We have reviewed your amended registration statement and have the following comments. 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 comments apply 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 these comments, we may have additional comments.

Amendment No. 2 to Registration Statement on Form F-1

Exhibits

1. Please have both counsels revise their opinions to sign the opinions. Please also have Campbells revise its opinion to refer to the number of shares being registered.

Ian Huen  
Aptorum Group Ltd  
September 28, 2020  
Page 2

Please contact Margaret Schwartz at 202-551-7153 or Dorrie Yale at 202-551-8776 with any questions.

Sincerely,  
Division of  
Office of Life

FirstName LastNameIan Huen  
Corporation Finance  
Comapany NameAptorum Group Ltd  
Sciences  
September 28, 2020 Page 2  
cc: Louis Taubman  
FirstName LastName