

January 20, 2023

Darren Lui  
Chief Executive Officer  
Aptorum Group Ltd  
17 Hanover Square  
London W1S 1BN, United Kingdom

Fiscal Year Ended December 31, 2021  
2022

Re: Aptorum Group Ltd  
Form 20-F for

Filed April 29,

File No. 001-38764

Dear Darren Lui:

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

cc:

Louis Taubman, Esq.