APTORUM GROUP LIMITED
17th Floor, Guangdong Investment Tower
148 Connaught Road Central
Hong Kong

November 15, 2018

VIA EDGAR
Keira Nakada
U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Consumer Products
100 F Street, N.E.
Mail Stop 4631
Washington, DC 20549

Re: Aptorum Group Limited
Amendment No. 1 to Registration Statement on Form F-1
Filed October 5, 2018
File No. 333-227198

Dear Ms. Nakada:

Aptorum Group Limited (the "**Company**," "**Aptorum**," "**we**," "us" or "our") hereby transmits its response to the letter received from the staff (the "Staff") of the Securities and Exchange Commission (the "Commission"), dated October 11, 2018 regarding our Registration Statement on Form F-1 (the "Registration Statement") previously submitted on September 5, 2018 and amended on October 5, 2018 (the "Registration Statement"). For ease of reference, we have repeated the Commission's comments in this response and numbered them accordingly. A second amended F-1 submitted publicly accompanying this Response Letter is referred to as Form F-1.

Please note that new language we are including in Form F-1 pursuant to your comments, is indicated in this letter in ***bold, italicized*** font; any deletions from the initial Registration Statement are indicated in this letter as ~~strikethrough~~ font.

Our Business

Statistical Significance, page 82

1. We note your response to comment 4 and your disclosure that you do not intend to use for any regulatory submission the standard of statistical testing that you have employed to compare different treatment groups. Please revise your disclosure to explain how standards for statistical significance relate to the U.S. Food and Drug Administration's evidentiary standards of efficacy.

Response: In response to the Staff's comment, we revised our disclosure as follows:

"Statistical Significance

The term statistical significance is to define the probability that a measured difference between two groups (e.g. two treatment groups, treatment versus control groups) is the result of a real difference in the tested variations and not the result of chance. It means that the result of a test does not appear randomly or by chance, but because of a specific change that is tested, so it can be attributed to a specific cause.

The confidence level indicates to what percentage the test results will not commit a type 1 error, the false positive. A false positive occurs when a change in the result is due to randomness (or other noise) and not the change in variations. At a 95% confidence level (p = 0.05), there is a 5% chance that the test results are due to a type 1 error. 95% has become the standard and usually be the minimum confidence level for the tests. To make the test more stringent, a 99% confidence level (p = 0.01) is also commonly employed, which means that there is a ~~5~~ ***1***% chance that the test results are due to a type 1 error.

In other words, a p value represents the confidence level. For example, if the p-value for a test is < 0.05, it means that there is less than 5% chance the difference between two groups is due to random error or by chance. If the p-value is < 0.01, it means that there is less than 1% chance the difference between two groups is due to random error or by chance.

We employed statistical testing to compare different treatment groups in animal studies simply for proof of concept and to aid ***internal decision making for*** further development. We do not intend to use this standard for any regulatory submission. The US FDA or other regulatory agencies may not necessarily employ the same statistical standard to assess the efficacy in clinical trials, the results of which would be submitted for regulatory approval. ***Although a p-value of 0.05 has become the standard,*** ~~T~~the US FDA or other regulatory agencies may also individualize their efficacy standard for different clinical programs based on the indications, the purpose of a clinical trial, among others."

We thank the Staff for your review of the foregoing. If you have further comments, we ask that you forward them by electronic mail to our counsel, Louis Taubman at ltaubman@htflawyers.com or by telephone at (917) 512-0827.

/s/ Ian Huen
Ian Huen
CEO

cc: Louis Taubman
Hunter Taubman Fischer & Li LLC