



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4546

August 21, 2017

VIA E-mail

Joseph Moscato  
President and Chief Executive Officer  
Generex Biotechnology Corporation  
10102 USA Today Way  
Miramar, FL 33025

**Re: Generex Biotechnology Corporation  
Preliminary Proxy Statement on Schedule 14A  
Filed April 18, 2017  
File No. 000-25169**

Dear Mr. Moscato:

We completed our review of your filing on August 17, 2017. 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,

/s/ Erin K. Jaskot, *for*

Suzanne Hayes  
Assistant Director  
Office of Healthcare & Insurance