



DIVISION OF
CORPORATION FINANCE

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

April 4, 2018

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

Re: Generex Biotechnology Corporation
Form 10-K for the Fiscal Year Ended July 31, 2017
Filed October 26, 2017
File No. 000-25169

Dear Mr. Moscato:

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.

Division of Corporation Finance
Office of Healthcare & Insurance