



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

DIVISION OF  
CORPORATION FINANCE

June 10, 2019

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

**Re: Generex Biotechnology Corp**  
**Form 10-K for the Fiscal Year Ended July 31, 2018**  
**Filed October 26, 2018**  
**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.

Sincerely,

Division of Corporation Finance  
Office of Healthcare & Insurance