

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

June 29, 2018

Geert Kersten Chief Executive Officer CEL-SCI CORP 8229 Boone Blvd. #802 Vienna, VA 22182

Re: CEL-SCI CORP

Registration Statement on Form S-1

Filed June 22, 2018 File No. 333-225843

Dear Mr. Kersten:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Jeffrey Gabor at 202-551-2544 with any questions.

Division of Corporation Finance Office of Healthcare & Insurance

cc: William T. Hart, Esq.