

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

DIVISION OF CORPORATION FINANCE

April 25, 2024

Thomas K. Equels Chief Executive Officer AIM ImmunoTech Inc. 2117 SW Highway 484 Ocala, FL 34473

> Re: AIM ImmunoTech Inc. Registration Statement on Form S-1 Filed April 19, 2024 File No. 333-278839

Dear Thomas K. Equels:

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 Doris Stacey Gama at 202-551-3188 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Richard Feiner, Esq.