



DIVISION OF  
CORPORATION FINANCE

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

January 27, 2020

Alexander Arrow  
Chief Financial Officer  
Protagenic Therapeutics, Inc.\new  
149 Fifth Avenue  
New York, New York 10010

**Re: Protagenic Therapeutics, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2018**  
**Filed March 29, 2019**  
**File No. 000-51353**

Dear Mr. Arrow:

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 Trade & Services