



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4546

October 31, 2016

Neil K. Warma  
Chief Executive Officer  
Opexa Therapeutics, Inc.  
2635 Technology Forest Blvd.  
The Woodlands, Texas 77381

**Re: Opexa Therapeutics, Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2015**  
**Filed March 15, 2016**  
**File No. 001-33004**

Dear Mr. Warma:

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,

p.p./s/Michael Clampitt

Suzanne Hayes  
Assistant Director  
Office of Healthcare and Insurance