



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

DIVISION OF  
CORPORATION FINANCE

November 18, 2019

Garo H. Armen, Ph.D.  
Chief Executive Officer  
Agenus Inc.  
3 Forbes Road  
Lexington, Massachusetts 02421

**Re: Agenus Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2018**  
**Filed March 18, 2019**  
**File No. 000-29089**

Dear Dr. Armen:

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 Life Sciences

cc: Zachary R. Blume - Ropes & Gray LLP