

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

December 15, 2022

Glenn Whaley Chief Financial Officer IMMUNIC, INC. 1200 Avenue of the Americas, Suite 200 New York, NY 10036

Re: IMMUNIC, INC.
Registration Statement on Form S-3
Filed December 9, 2022
File No. 333-268737

Dear Glenn Whaley:

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: Ilan Katz, Esq.