



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

DIVISION OF  
CORPORATION FINANCE

June 28, 2019

David R. Koos  
Chairman, Chief Executive Officer  
Zander Therapeutics, Inc.  
4700 Spring Street, St 304  
La Mesa, California 91942

**Re: Zander Therapeutics, Inc.**  
**Item 4.02 Form 8-K**  
**Filed May 31, 2019**  
**File No. 333-220790**

Dear Mr. Koos:

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 Healthcare & Insurance