

Mail Stop 0610

July 27, 2009

Mr. Geert R. Kersten
Chief Executive Officer
Cel-Sci Corporation
8229 Boone Blvd., Suite 802
Vienna, Virginia 22182

Re: Cel-Sci Corporation
Preliminary proxy statement filed July 17, 2009
File No. 001-11889

Dear Mr. Kersten:

We have completed our review of your preliminary proxy statement and related filings and have no further comments at this time.

Sincerely,

Jeffrey Riedler
Assistant Director

cc: William T. Hart, Esquire
Hart & Trinen
1624 Washington Street
Denver, Colorado 80203

