



DIVISION OF  
CORPORATION FINANCE

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

September 1, 2011

Via E-mail

Charles T. Bernhardt, CPA  
Hemispherx Biopharma, Inc.  
One Penn Center  
1617 JFK Blvd., Suite 660  
Philadelphia, PA 19103

**Re: Hemispherx Biopharma, Inc.  
Preliminary Schedule 14A  
Filed August 22, 2011  
File No. 001-13441**

Dear Mr. Bernhardt:

We have completed our review of your filing. We remind you that our comment or changes to disclosure in response to our comment do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Jeffrey Riedler

Jeffrey Riedler  
Assistant Director

cc: Via E-mail

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