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

DIVISION OF
CORPORATION FINANCE

June 27, 2022

Peter Rodino III
AIM ImmunoTech Inc.

Re: AIM ImmunoTech Inc. (the "Company")
Incoming letter dated May 9, 2022

Dear Peter Rodino III:

This letter is in response to your correspondence concerning the shareholder proposal (the "Proposal") submitted to the Company by Walter Lautz for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders.

The Proposal nominates two individuals for election to the Company's board of directors.

There appears to be some basis for your view that the Company may exclude the Proposal under Rule 14a-8(i)(8)(iv) because it seeks to include specific individuals in the Company's proxy materials for election to the Company's board of directors. Accordingly, we will not recommend enforcement action to the Commission if the Company omits the Proposal from its proxy materials in reliance on Rule 14a-8(i)(8)(iv).

Copies of all of the correspondence on which this response is based will be made available on our website at https://www.sec.gov/corpfin/2021-2022-shareholder-proposals-no-action.

Sincerely,

Rule 14a-8 Review Team

cc: Walter Lautz

May 9, 2022

VIA EMAIL (*shareholderproposals@sec.gov*) SEC

Division of Corporation Finance
Office of Chief Counsel
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Aim ImmunoTech Inc.
Stockholder Proposal of Walter Lautz.

Ladies and Gentlemen:

This letter is submitted by Aim ImmunoTech Inc., a Delaware corporation (the "Company") pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, to request confirmation that the staff (the "Staff") of the Securities and Exchange Commission (the "Commission") will not recommend enforcement action if, in reliance on Rule 14a-8, the Company excludes from the proxy materials for the Company's 2022 Annual Meeting of Stockholders (the "Annual Meeting") a proposal submitted by Walter Lautz (the "Proponent"), dated April 18, 2022 and received by the Company on April 19, 2022 (the "Proposal"). Please note that, by e-mail to the SEC on April 28, 2022, AIM forwarded to the SEC a copy of its notice to the Proponent (the "Notice") informing the Proponent that AIM will exclude the proposals set forth in the Proposal from its Proxy Statement and proxy materials for the Annual Meeting. A copy of the Notice is attached hereto as Exhibit A for the SEC's convenience. Notwithstanding the Notice, the Company now seeks no-action.

Pursuant to Rule 14a-8(j),

(a) a copy of the Proposal is attached to the Notice which is included herewith; and

(b) a copy of this letter is promptly being sent to the Proponent.

The Company has yet to file its definitive proxy materials for the Annual Meeting and has yet to definitively determine when it will be filed. Last year, the Company filed its definitive proxy materials on August 17, 2021 and anticipates that definitive proxy materials for the Annual Meeting will be filed approximately one year thereafter. This letter and its exhibits are being submitted via email to s*hareholderproposals@sec.gov*.

In the Proposal, the Proponent's sole request is that his "nominations be included in the official proxy statement."

His supporting statement is as follows:

> As a long-term shareholder of AIM ImmunoTech Inc. I have become increasingly concerned with the direction of the Company, lack of corporate oversight and significant loss of shareholder value over the past two years. As it specifically relates to corporate oversight I question the independence of the current construction of the Board of Directors, the qualifications of the current Directors and their ability to properly serve shareholders as Directors on the board of a publicly traded biotechnology company and decisions made by the compensation committee as it relates to Board of Director and senior management. As such, I am exercising my right as a shareholder of record, in compliance with the Company bylaws and Rule 14a-8 of the Exchange Act to nominate two candidates for election to the AIM ImmunoTech Inc Board of Directors at the 2022 annual shareholder meeting. I request my nominations be included in the official proxy statement so that all shareholders are provided the opportunity to consider these changes that I believe are in the best interest of the Company and its shareholders.
>
> I hereby nominate Mr. Daniel Ring to run for the position of Chairman of the Board currently held by Dr. William Mitchell. In addition, I hereby nominate Mr. Rob Chioini to run for the Director position currently held by Mr. Steward Appelroth.
>
> I have attached the CV's for both individuals for review. Mr. Ring has a +20-year career as an Executive Director for Business Development with large publicly traded pharmaceutical companies including Merck & Co and Bristol-Myers Squibb. Mr. Chioini, founded, brought public and served as the CEO and on the Board of Directors for Rockwell Medical Inc (NASDAQ: RMTI) for over twenty years. Both individuals have extensive experience guiding public pharmaceutical and biotechnology companies and I believe will deliver the new perspective required for AIM ImmunoTech Inc.
>
> I have included the required proof of stock ownership, CV's for my Director Nominations and their letters accepting the nomination. AIM ImmunoTech Inc has a bright future, and its lead drug candidate Ampligen represents the opportunity to change lives.

BASIS FOR EXCLUSION OF THE PROPOSAL

The Proposal May Be Excluded Under Rule 14a-8(i)(8)(iv) Because the Proposal solely seeks to include specific individuals in the Company's proxy materials for election to the board of directors.

As discussed below, the Proposal solely seeks to include specific individuals in the company's proxy materials and, according to the clear meaning of this subsection, the Proposal is excludible.

Rule 14a-8(i)(8)(iv)

Rule 14a-8(i)(8)(iv) states that if the proposal relates to director elections and "seeks to include a specific individual in the company's proxy materials for election to the board of directors" the Proposal can be excluded

Here, the most generous reading of the Proposal's sole request is that two individuals be nominated to run for seats on the Board and that the nominations be included in the Company's proxy materials. However, a literal reading of the Proposals is that Daniel Ring run "for the position of Chairman of the Board currently held by Dr. William Mitchell" and that the other, Rob Chioini, "run for the Director position currently held by Mr. Steward Appelroth." So, the two proposed nominees are not just requested to run for a seat on the Board, they also specifically are running against two of the current three members of the Board.

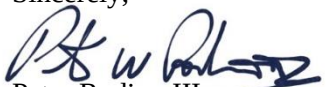
The Staff has concurred in the exclusion of proposals that seek to include a specific nominee to the Board. For instance, in *Global TeleSystems, Inc.* (avail. June 5, 2001), the proponent's proposal related to his nomination of himself for election to the Board of Directors of that company. The Staff stated that "There appears to be some basis for [GTS'] view that GTS may exclude the proposal under rule 14a-8(i)(8) as relating to an election for membership on its board of directors" and, accordingly, it stated that it would not recommend enforcement action to the Commission if GTS omits the proposal from its proxy materials in reliance on rule 14a-8(i)(8).

The Company requests your confirmation that the Staff will not recommend any enforcement action to the Commission if the Proposal is excluded from the Company's 2022 proxy materials for the reasons described in this letter.

We would be happy to provide any additional information and answer any questions regarding this matter. Should you have any questions, please contact the undersigned at Peter.rodino@aimimmuno.com or (352) 448-7797.

Thank you for your consideration.

Sincerely,



Peter Rodino III,
COO and General Counsel

Encl.

EXHIBIT A

April 28, 2022

Via E-mail (wlautz@peerlesscapitalco.com) and
Registered Mail
Walter Lautz
[redacted]
PII

Re: Aim ImmunoTech Inc.
Stockholder Proposal of Walter Lautz.

Dear Mr. Lautz:

This letter is submitted to you by Aim ImmunoTech Inc., a Delaware corporation (the "Company") in response to your proposal dated April 18, 2022 and received by the Company on April 19, 2022 (the "Proposal"). A copy of your Proposal is included herewith.

Pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934 (the Exchange Act"), you are hereby notified that the Company will exclude the proposals set forth in the Proposal from its Proxy Statement and proxy materials for the Company's 2022 Annual Meeting of Stockholders (the "Annual Meeting"). A copy of this letter is being sent to the Securities and Exchange Commission simultaneously herewith.

In the Proposal, your sole request is that your "nominations be included in the official proxy statement."

Among other reasons, the Company is excluding the Proposal from its proxy materials for the 2022 Annual Meeting for the following reasons:

The Proposal solely seeks to include specific individuals in the Company's proxy materials for election to the board of directors. Rule 14a-8(i)(8)(iv) under the Exchange Act states that if the proposal relates to director elections and "seeks to include a specific individual in the company's proxy materials for election to the board of directors" the Proposal can be excluded.

Your Proposal fails to evidence that you hold the minimum amount of Company securities for the continuous period required by the Rule 14a-8(b)(1). This Rule provides that,

in order to be eligible to submit a proposal, a stockholder must have continuously held at least $2,000 in market value for at least one year as of January 4, 2021 and must continue to hold those securities through the date the Proposal is submitted to the Company and the date of the meeting. Company records do not show that you hold any Company shares in your name. As you are not a registered holder, you must provide proof of beneficial ownership of the securities.

As the proof you provide in the Proposal fails to show continuous ownership of Company shares during the requisite period and, in fact shows holdings of less than the minimum required amount on a date within the requisite period of continuous ownership, you do not demonstrate that you hold the minimum requisite amount of Company stock and the Proposal is excludible under Rule 14a-8(f).

Please carefully review the requirements of Rule 14a-8 under the Exchange Act.

Sincerely,

Peter Rodino III,
COO and General Counsel

April 18, 2022

To: AIM ImmunoTech Inc
c/o Corporate Secretary,
Mr. Tom Equels, CEO & BOD member
William Mitchell, Chairman of the BOD
Stewart Appelroth, BOD member
2117 SW Highway 484
Ocala, FL 34473

To Whom It May Concern.

As a long-term shareholder of AIM ImmunoTech Inc. I have become increasingly concerned with the direction of the Company, lack of corporate oversight and significant loss of shareholder value over the past two years. As it specifically relates to corporate oversight I question the independence of the current construction of the Board of Directors, the qualifications of the current Directors and their ability to properly serve shareholders as Directors on the board of a publicly traded biotechnology company and decisions made by the compensation committee as it relates to Board of Director and senior management. As such, I am exercising my right as a shareholder of record, in compliance with the Company bylaws and Rule 14a-8 of the Exchange Act to nominate two candidates for election to the AIM ImmunoTech Inc Board of Directors at the 2022 annual shareholder meeting. I request my nominations be included in the official proxy statement so that all shareholders are provided the opportunity to consider these changes that I believe are in the best interest of the Company and its shareholders.

I hereby nominate Mr. Daniel Ring to run for the position of Chairman of the Board currently held by Dr. William Mitchell. In addition, I hereby nominate Mr. Rob Chioini to run for the Director position currently held by Mr. Steward Appelroth. I have attached the CV's for both individuals for review. Mr. Ring has a +20-year career as an Executive Director for Business Development with large publicly traded pharmaceutical companies including Merck & Co and Bristol-Myers Squibb. Mr. Chioini, founded, brought public and served as the CEO and on the Board of Directors for Rockwell Medical Inc (NASDAQ: RMTI) for over twenty years. Both individuals have extensive experience guiding public pharmaceutical and biotechnology companies and I believe will deliver the new perspective required for AIM ImmunoTech Inc.

I have included the required proof of stock ownership, CV's for my Director Nominations and their letters accepting the nomination. AIM ImmunoTech Inc has a bright future, and its lead drug candidate Ampligen represents the opportunity to change lives.

Best Regards,

Walter Lautz

PII
[redacted]
wlautz@peerlesscapitalco.com

PII

PII

PII

Important Information

Robinhood Securities, LLC ("RHS") carries your account as the clearing broker by arrangement with your introducing broker-dealer, Robinhood Financial LLC ("RHF"). If this is a margin account and we maintain a special miscellaneous account for you, this is a combined statement of your general account and special miscellaneous account maintained for you under Regulation T issued by the Board of Governors of the Federal Reserve System. The permanent record of the special miscellaneous account as required by Regulation T is available for your inspection at your request.

The per annum rate of interest charged on debit balances in your account is shown on this statement. This rate may change from time to time in accordance with fluctuations in interest rates. Interest is computed from the 1st day of the month to the last day of the month. The interest is based on the average daily balance in your account with us, and for the actual number of days based on an interest year of 360 days. When calculating margin interest, free credit balances in all accounts will be offset against any debit in the margin account and the interest will be charged on the new debit balance.

We are required to report to the Internal Revenue Service all cash dividends and interest credited to your account on securities held for you in our name. All dividends and interest credits should be included in your income tax return.

Information relative to fees and any other charges incurred in connection with listed option transactions occurring during the month has previously been furnished to you in confirmation of such transactions. A summary of the information will be made available to you promptly upon request. Exercise assignment notices for option contracts are allocated among customer short positions pursuant to a manual procedure which randomly selects from amongst all customer short option positions including those contracts which are subject to exercise. All short American style option positions are liable for assignment at any time whereas European style options are assigned at expiration. A more detailed description of our random allocation procedure is available upon request.

You are to promptly advise Robinhood of any material changes concerning your investment objectives or financial situation by updating your information using the Robinhood platform or by contacting help@robinhood.com.

RHS is a Member of SIPC, which protects securities customers of its members up to $500,000 (including $250,000 for claims for cash). Explanatory brochure available upon request or at www.sipc.org.

Any free credit balances represent funds payable upon demand which, although properly accounted for on our books and records, is not segregated, and may be used in the conduct of this firm's business as permissible under the SEC Rule 15c3-2.

Notice to Customers

RHS acts as clearing agent for your trades. Your account, which was introduced to us by RHF, is established under your name on a "fully disclosed" basis at RHS. You remain a customer of RHF.

As required, under SEC rules, both the RHF and RHS Order Routing Reports as well as information regarding specific order routing information is available free of charge upon request.

As a clearing agent, RHS provides securities clearance and may provide order execution based on RHF instructions. RHS will not be involved with or have any responsibility for decisions regarding securities transactions in your account. RHF will be responsible for opening, approving and monitoring all activities in connection with your account. The entry of orders and any instructions regarding the deposit or withdrawal of securities or monies should be made through RHF.

In addition to the above mentioned services, RHS will provide cashiering services, safeguarding of funds and securities while in our possession, monitoring compliance with applicable credit Regulation T and RHS internal policies, preparing and making accessible your account records (including transaction confirmations and periodic statements of your account).

The dividend totals reflected in the Income and Expense Summary are inclusive of both taxable and non-taxable dividends.

Interest charges to your account may be based on the size and net debit balance during the interest period. These rates are subject to revision with appropriate notice. For more complete information regarding interest charges to customers, consult the RHF Fee Schedule, available at https://rbnhd.co/fees.

We also offer Robinhood Cash Management as an additional feature of your account. Robinhood Cash Management includes debit card access to your account and automatic sweep of uninvested cash to bank deposits. If you participate in Robinhood Cash Management, your use of the debit card, and your rights with respect to debit card transactions, will be governed by the Robinhood Debit Card Agreement, which has been provided to you and is available at https://rbnhd.co/debit-card-agreement.

In case of errors or questions about your electronic transfers, including your debit card transactions, or if you think your statement or receipt is wrong or if you need more information about a transaction listed on the statement or receipt, email Robinhood at help@robinhood.com. Robinhood must hear from you no later than sixty (60) days after you were sent the FIRST statement on which the problem or error appeared.

A. Tell RHF your name and account number.
B. Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information.
C. Tell RHF the dollar amount of the suspected error.

RHF will investigate your complaint and will correct any error promptly. If we take more than ten (10) business days to do this, RHF will credit your account for the amount you think is in error, so that you will have the use of the money during the time it takes RHF to complete our investigation.

If you participate in Robinhood Cash Management, your uninvested cash is swept into accounts at FDIC-insured program banks, where your uninvested cash will earn interest from the program banks and be eligible for FDIC insurance up to applicable limits, subject to FDIC rules. Please see the Robinhood Securities, LLC & Robinhood Financial LLC Insured Network Deposit Sweep Program Disclosures, available at https://rbnhd.co/ind-disclosure, for the terms and conditions of this sweep program, including information regarding FDIC insurance coverage.

RHF and RHS are members of the Financial Industry Regulatory Authority, Inc. ("FINRA"), and we are required to inform you of the availability of the FINRA Investor Brochure, which contains information on FINRA BrokerCheck. You may contact FINRA at 800-289-9999 or via their website www.finra.org. RHS carries your account and acts as your custodian for funds and securities deposited with us directly by you, through RHF as a result of transactions we process to your account. Any suspected inaccuracy or discrepancy in your account statement must be promptly reported to RHF. In order to protect your rights, please confirm any oral communications in writing and include your brokerage account number. General inquiries or concerns regarding your account should be directed to: help@robinhood.com.

The SEC requires all broker-dealers that route orders in equity securities and options to make available quarterly reports that present a general overview of their routing practices. The reports must identify the significant venues to which customer orders were routed for execution during the applicable quarter and disclose the material aspects of the broker-dealers relationship with such venues. In addition, the Rule (SEC Rule 606) requires broker-dealers to disclose, upon customer request, the venues to which the individual customer's orders were routed for the six months prior to the request, and the execution time for the orders that were executed. For further information, please contact RHF.

All trade confirmations are transmitted on or about the transaction date. If you participate in the Dividend Reinvestment Plan program details concerning the reinvestment of dividends will be included on your monthly statements. RHS will act as agent in having your DRP purchases executed.

Statement of Financial Condition
Robinhood Securities, LLC. Audited Statement of Financial Condition as of December 31, 2021 is available on the Company's website at www.robinhood.com/legal. A paper copy may be requested at no cost by calling 1-(800)-282-1327. On December 31, 2021, Robinhood Securities, LLC. had a net capital of $2,841,411,426 which was $2,706,843,428 in excess of its required net capital of $134,567,998.

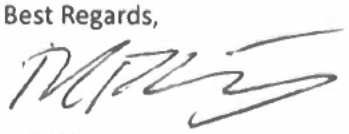
Please retain this statement as it will be helpful in preparing your income tax returns and may be needed along with subsequent statements to verify interest charges in your account. This statement shall be deemed conclusive unless objected to in writing within ten (10) days.

April 18, 2022

To Whom It May Concern.

I Dan Ring accept the nomination to run for election to the Board of Directors for AIM Immuno Tech (AMEX: AIM) at the 2022 Shareholder Meeting. My resume is attached for review.

Best Regards,



Dan Ring

DANIEL P. RING
PII
[redacted]

SUMMARY

Experienced pharmaceutical executive with twenty-four years of commercial and strategic transaction experience in Biotech, Big Pharma and generic companies. Highly skilled and experienced commercial operator and strategic transactions negotiator with seventeen years of licensing & business development roles. Negotiated and executed more than thirty-five transactions worth more than $5 Billion in NPV, ranging from early pre-clinical collaborations through commercialization; including in-licensing, out-licensing, subsidiary divestitures, product divestitures, authorized generics, patent settlements, marketing alliances, co-promotions and private debt and equity offerings. Proven track record of success in highly competitive corporations, strong analytical, interpersonal and leadership skills.

PROFESSIONAL EXPERIENCE

Bristol-Myers Squibb Princeton, NJ **April 2021 – Present**
Executive Director, Business Development Transactions

- Responsible for the global business development function supporting the Cardiovascular, Fibrosis, Immunology and Neurology (CFIN) business unit.
- Managed a team of three transaction professionals tasked with identifying, evaluating and executing new strategic business opportunities, initiatives, mergers, acquisitions, partnerships, alliances, and/or licensing agreements.

SOLIGENIX, INC., (NASDAQ: SNGX) Princeton, NJ **September 2019 – April 2021**
Vice President, Business Development & Strategic Planning

Reporting to the CEO and member of the Executive Management Team, responsible for Soligenix's global business development function, tasked with identifying, evaluating and executing new strategic business opportunities, initiatives, mergers, acquisitions, partnerships, alliances, and/or licensing agreements.

- In addition, responsible for the pre-launch U.S. marketing planning for SGX301 including establishing the brand name, fielding multiple rounds of physician and payer primary market research, developing the global forecast and budget, writing the marketing plan, and initiating the commercial infrastructure build out.
- Executed an exclusive license for a proprietary vaccine adjuvant for corona viruses and pandemic flu.

EXELA PHARMA SCIENCES, LLC, Lenoir, NC **July 2014 – September 2019**
Vice President, Strategic Transactions & Alternate Channel Marketing

Reporting to the CEO and member of the Executive Management Team, responsible for growing Exela's revenue and income via transactions with strategic partners and establishing Exela's U.S. commercial operations.

- Established US commercial operations infrastructure; set up distribution services agreements with major wholesalers, built an EDI enabled in-house order to cash system, built in-house customer contract management capability, negotiated commercial contracts with group purchasing organizations (GPOs), hospital systems and government pricing entities.
- Lead the identification, evaluation and execution of financial transactions that supported Exela's strategic objectives including product acquisition/licensing, manufacturing facility acquisitions, contract manufacturing agreements, and use of debt financing instruments.
- Executed several strategic transactions including a $50mm private debt offering with healthcare hedge-fund Deerfield Capital Management; an asset purchase agreement for an NDA acquired from Pfizer, an Authorized Generic agreement with Merck and an exclusive license for an auto-injector device.

DANIEL P. RING
PII
[redacted]

MERCK & CO., INC., Whitehouse Station, NJ **July 2007 – July 2014**
Executive Director, Corporate Licensing
Responsible for the financial evaluation, deal structure, term sheet development, negotiation and execution of in-bound and out-bound transactions from pre-clinical through Phase 3, between Merck and strategic partners. Worked closely with Merck's senior management in research, finance and marketing to assess, prioritize and negotiate deals.

- Executed fifteen major licensing transactions worth more than $4 Billion to Merck's pipeline.
- Focused on Infectious Disease and Drug Delivery Technology therapeutic areas; supplemented with oncology and diabetes experience.
- Lead large cross functional deal teams that assessed and evaluated licensing opportunities; then lead a core three person negotiation team consisting of scientific, commercial and transaction legal representatives in negotiations with partners.
- Developed targeted product profile, forecast, product P&L and NPV analysis; working closely with colleagues in research, finance and marketing.
- Highly experienced in handling complicated intellectual property rights issues prevalent in pharmaceutical licensing transactions; knowledgeable on manufacturing supply chain and tax optimization strategies.
- Described by colleagues as an inclusive, decisive, confident, results driven deal team leader.
- Consistently ranked as one of the highest performers in the Merck Licensing organization.
- Lead negotiator on a highly complex Phase 3 deal with European biotech AiCuris, GmbH that was voted the "Breakthrough Deal Alliance" of the year in 2013 by Deloitte-Recap Alliance.

Director, U.S. Business Development, North Wales, PA **June 2005 – July 2007**
Sourced, evaluated, structured, negotiated and executed in-bound and out-bound transactions from NDA approval through loss of patent exclusivity, between Merck's largest operating division (U.S. Human Health) and strategic partners.Worked closely with divisional senior management and marketing to assess, prioritize and negotiate deals.

- Executed more than five transactions worth more than $1 Billion to the U.S. operating division.
- Identified potential partners, developed data packages and ran multi-party negotiations / auctions to optimize terms for Merck.
- Developed forecasts, P&Ls and performed NPV analyses.
- Deal leader for Merck's first ever authorized generics, for Zocor® and Proscar®.
- Deal leader for a complex U.S. subsidiary restructuring and divestiture to a private equity group.
- Received two *USHH Division Awards;* Winner of the *2005 Finance Award for Teamwork; 2005 Merck Marketing Award Finalist: Best Sequenced Growth.*

Manager Pricing Strategy, Economic Affairs, North Wales, PA **July 2003 – June 2005**

- Developed strategic pricing initiatives and optimal reimbursement strategies across all segments for the Hypertension, Antifungal and Antibacterial franchise business groups.
- Managed a non-promoted product portfolio of thirty products. Responsibilities included forecasting of sales and manufacturing requirements and managing discounts and rebates.
- Member of a three person business development team focused on divesting non-promoted products to specialty pharmaceutical companies.
- Received two *Merck Awards of Excellence;* Nominated for two *Annual Merck Marketing Awards.*

Marketing Associate, Hospital Marketing, North Wales, PA **May 2001 – Jul 2003**

- Developed sales and promotional initiatives for the Specialty Hospital Representative sales force supporting Vioxx®, Singulair®, Fosamax®and Arcoxia™

DANIEL P. RING
PII
[redacted]

- Developed the national launch plans and pull-through resources for two hospital contracting initiatives for Vioxx®
- Received the *2001 Teamwork Award;* Received a 1S 2002 *Go the Extra Mile (GEM) Award;* Received two *Marketing Special Achievement Awards; 2002 Merck Marketing Award Finalist: VIP- Best Managed Care Customer Program*

Specialty Representative, Arthritis & Analgesia, Tampa & Orlando, FL **May 1999 – May 2001**

- Selected to part of the elite team of sixty representatives nationwide responsible for launching Vioxx® with thought leader Rheumatologists and Orthopedic Surgeons.
- Consistently outperformed peers in the Nation and Region in share, share change & sales objectives.
- Received five *Merck Awards of Excellence*

Professional Representative, Clearwater, FL **May 1998 – May 1999**

- Influenced physician prescribing habits within many therapeutic categories by effectively communicating technical and economic information
- Chosen by management as the Tampa Bay District Launch Champion for Vioxx® to assist in the design and implementation of the district launch plan

Marketing Associate, New Product Planning, Whitehouse Station, NJ **June 1997 – May 1998**

- Assisted product managers in the development of the Worldwide Marketing Plan for Aggrastat®
- Managed various phases of the Aggrastat® pricing recommendation process

EDUCATION

VILLANOVA UNIVERSITY, Villanova, PA
Bachelor of Arts in History - May 1991
Minor in French completed at The International Language Center - Dijon, France

ARIZONA STATE THUNDERBIRD School of Global Management, Glendale, AZ
Master of Business Administration in International Management, May 1997
Concentration: Accounting
Language Concentration: Russian

CONTINUING EDUCATION

Harvard Law School Program On Negotiation - *Negotiation for Senior Executives*
The University of Chicago Graduate School of Business - *Pricing: Strategy and Tactics*
Merck Professional Development - *Marketing Strategy* (S*COPE)* and *Managing Without Authority*
The Institute for Professional Learning -*Applied Statistical Forecasting Methods*

ADDITIONAL INFORMATION & LANGUAGES

Patent holder, US patent no. **10,412,965** Use of the Antifungal Ilicicolin H in Agriculture
Founder, Ramhorne Capital, LLC and KEAL Pharmaceuticals, LLC
Co-Founder, Agrobiologics, LLC and Sani-Pay, LLC
Volunteering: BSA Troop 24 Treasurer; Cub Scouts Pack 52 Den Leader (former); Adoption Ambassador, Pearl Buck International; Coach CBAA youth lacrosse (former); Board Member, Doylestown Park & Recreation (former)
Languages: Russian - Intermediate; French- Intermediate

DEAL SHEET

Date	Partners	Deal Type	Compound/Therapeutic Area	Deal Value ($MM)
April 2022	BMS/RTW	Royalty Acquisition	Cardiovascular	$300
December 2020	Pontifax Medison Finance / Soligenix	Convertible Debt Financing	Venture debt	$30
April 2020	Boston Scientific Company/Soligenix	Exclusive License	Vaccine adjuvant for corona viruses and pandemic flu	>$50
October 2018	Merck & Co., Inc./Exela	Authorized Generic	Commercialized injectable steroid	>$50
April 2018	X-Gen/Exela	Cross-Acquisition & Termination	Seven ANDA development programs	>$30
August 2017	Namigen/Exela	Termination & Reversion	Two ANDA development programs	N/A
April 2017	Deerfield Management/Exela	Convertible Debt Financing	Venture debt	$100
July 2016	Ypsomed/Exela	Device license	Auto-injector for migraine	>$20
May 2015	Pfizer Exela	NDA acquisition	Cardiovascular product	>$30
December 2014	ContraVir/Chimerix	In-license	Ph 2 Anti-viral compound	>$500
May 2014	Samsung BioSimilars/Merck	In-license	Rheumatoid arthritis product	>$300
March 2014	Samsung BioSimilars/Merck	Cross License	Device for Bio-Similar Product	N/A
May 2013	Scynexis/Merck	Termination & Reversion	Ph 1 broad spectrum anti-fungal	>$50
Oct 2012	AiCuris/Merck	In-license	Ph 3 ready lead compound and 2nd MOA compounds for HCMV	>$2.0 B
Jul 2012	Chimerix/Merck	In-license	Ph 1 compound for HIV	>$500
Nov 2012	Bend TechnologyMerck	IP license	Drug formulation technology for CV	>$200
May 2012	Tesaro/Merck	Out-license	Ph 1 PARPi for oncology	>$500
Nov 2011	Bend Technology/Merck	In-license	Drug formulation technology for ID	>$50
Jun 2011	Nuvisan/Merck	Stock sale of foreign subsidiary & license	Essex Pharma, GmbH	>$50
May 2011	Institute for Hepatitis & Virus Research/Merck	Out-license	Natural product collection	>$30
Oct 2010	BioRelix/Merck	In-license & collaboration	Riboswitch targets for infectious disease	>$175
May 2010	Anacor/Merck	Termination & Reversion	Ph 2 broad spectrum anti-fungal	>$100
Mar 2010	Emergent Technologies Inc./Merck	In-license & collaboration	SiRNA delivery technology	N/A
Jul 2009	Depomed/Merck	IP license	Drug formulation technology for diabetes	>$200 mm
Apr 2009	Medarex-MBL/Merck	In-license	Ph 2 MAb for c. diff	>$1.2 B
Oct 2008	Orchid/Merck	In-license & collaboration	Infectious disease basic research collaboration	>$150

May 2008	Ranbaxy/Merck	In-license & collaboration	Infectious disease basic research collaboration	>$150
Oct 2007	URL Mutual, Inc./Merck	Product divestiture	Anti-gout product	>$30
Aug 2007	BioNiche USA/Merck	Product divestiture	Injectable antibiotic	>$30
Jan 2007	Healthyi/Merck	Marketing collaboration	Diabetes	>$50
Nov 2006	Roche/Merck	Marketing collaboration	Diabetes	>$100
Oct 2006	Aton Pharma-Cerberus Capital/Merck	Stock sale of U.S. subsidiary	Multiple products and markets	>$400
Sep 2006	PediaRX/Merck	Marketing collaboration	Hypertension	>$50
May 2006	Dr. Reddy's Labs/Merck	Patent settlement	Dermatology	>$325
Feb 2006	Neurogen/Merck	Co-promotion	Pain	N/A
Jan 2006	Dr. Reddy's Labs/Merck	Authorized generic	PROSCAR	>$300
Jan 2006	Dr. Reddy's Labs/Merck	Authorized generic	ZOCOR	>$500

April 18, 2022

To Whom It May Concern.

I Rob Chioini accept the nomination to run for election to the Board of Directors for AIM Immuno Tech (AMEX: AIM) at the 2022 Shareholder Meeting. My resume is attached for review.

Best Regards,

Rob Chioini

ROBERT L. CHIOINI

PII

CHIEF EXECUTIVE MANAGEMENT

Leadership • Strategic Planning • Drug & Device Development • Sales, Marketing & Commercialization

Accomplished entrepreneur and driven executive with proven, extensive business management in private and public enterprises. Highly experienced in operations, P&L oversight, manufacturing, marketing, sales, new product creation, multi-channel distribution, new market identification, clinical drug development, medical devices, intellectual property, licensing, financing, IPO, banking and investor relationships, commercialization, strategic positioning and U.S. congressional and government agency relations. Experience spans all phases of building a business, from inception into a multimillion-dollar pharmaceutical drug and/or medical device company. Results-oriented, decisive leader with proven track record of increasing sales and growing bottom line while spearheading operational improvements to drive productivity and reduce costs. Excel in dynamic, demanding environments while remaining calculated and focused.

CORE COMPETENCIES

- Visionary Leadership
- Strategic Oversight
- Capital Raising & IPO
- Drug and Device Development
- Product & Sales Growth
- U.S. Congressional Relations
- Highly Skilled Negotiator
- Risk Management
- Public Market Relations

PROFESSIONAL EXPERIENCE

BRIGHT ROCK HOLDINGS, LLC., Wixom, Michigan

Member, Manager; 2021 – Present

Member, Manager; 2019 – 2020

Assist pharmaceutical drug and medical device companies and management in all facets of growing their business.

Help secure financing, IPO and banking and investor relationships. Provide expertise, network and support for operations which includes marketing, sales, customer service, manufacturing, commercialization, distribution, intellectual property, licensing, negotiations, strategic positioning, quality assurance and quality control, regulatory compliance, clinical drug and device development, corporate governance and U.S. congressional and government agency relationships.

SQI DIAGNOSTICS, INC., Wixom, Michigan/ Toronto, Canada (OTCQX-US: SQIDF/TSX-V: SQD)

Chief Executive Officer, Director; 2020 – 2021

Provide executive leadership for publicly traded, vertically integrated diagnostic medical device company with one manufacturing plant and 50 employees servicing the U.S. and Canadian diagnostic healthcare markets.

Responsible for leading all operations and strategic direction for publicly traded medical device company focused on discovery, development and commercialization of innovative diagnostic testing products targeting lung transplant, autoimmune disease and COVID-19. In charge of U.S. and Canadian operations, involving a complete revamp of the business, including financing, clinical and regulatory medical device development, manufacturing, commercialization and expanding investor exposure leading to a 200% increase in company valuation to a $155 million market capitalization.

Key Achievements:

- Successfully raised approximately $10 million in cash to execute newly created business plan.

- Assembled and oversaw diagnostic and clinical development team to complete regulatory submissions for Covid-19 emergency use authorizations to FDA and Health Canada.
- Initiated complete revamp of business with new strategy that included clinical development, commercialization and distribution of a lab-based specialized diagnostic lung test, two Covid-19 severity triage tests and one direct-to-consumer home-based Covid-19 antibody test, celiac test and rheumatoid arthritis test respectively.
- Built new company website with supporting eCommerce engine (e.g., shopping cart, inventory management, order management, account management, shipping, labels, etc.) and user interface for additional functionality (e.g., notifications, approval workflows, healthcare tele-medicine, test results).
- Secured exclusive distribution agreement with existing well-established diagnostic testing company.
- Secured leading, global full-service brokerage and investment bank Oppenheimer & Co. to execute a $40 million U.S. equity financing and simultaneous up-listing to the U.S. NASDAQ Stock Exchange.

ROCKWELL MEDICAL, INC., Wixom, Michigan (NASDAQ: RMTI)

Founder, Chairman & Chief Executive Officer; 1995 – 2018

Provide executive leadership for publicly traded, vertically integrated pharmaceutical drug and medical device company with four manufacturing plants, five distribution facilities and 330 employees servicing the U.S. and global dialysis healthcare market.

Responsible for building and leading all operations and strategic direction for the Company with full accountability for bottom-line factors. Experience spans all phases of starting and building the business, from inception into a successful, vertically integrated, publicly traded $980 million pharmaceutical drug and medical device company. Extensive expertise in understanding and executing on all facets of business development, including building a culture of excellence, financing, IPO, capital markets, banking and investor relationships, sales, marketing, new product creation, new market identification, intellectual property, licensing, clinical drug development, pharmaceuticals, medical devices, manufacturing, distribution, commercialization, strategic positioning and U.S. congressional and government agency relationships.

Key Achievements:

- Led successful IPO on NASDAQ stock exchange (RMTI) to fund company growth.
- Transformed product market with launch of multiple novel products that became standard of care in industry, expanding market share and building and strengthening the company brand.
- Initiated innovative sales strategy increasing company sales revenue from zero to $65 million, ultimately becoming the #2 supplier in the U.S market.
- Expanded the business by forging new strategic customer relationship with largest dialysis provider (DaVita) and became their top supplier and a partner.
- Revolutionized product distribution and lowered costs utilizing multiple manufacturing plants and direct delivery of products to end-user.
- Spearheaded new product development, obtaining 4 new drug (3-NDA, 1-ANDA) U.S. FDA approvals and 14 new medical device (510K, Class III) U.S. FDA approvals.
- Highly skilled in negotiating with U.S. FDA for drug and device clinical pathway approval, new clinical label indications and manufacturing audits, as well as with suppliers, customers and business partners.
- Identified and licensed worldwide rights to proprietary technology and successfully raised over $150 million to fund successful human clinical studies for drug development of innovative iron replacement therapy (last raise $68 million via Bank of America Merrill Lynch).
- Built top-level clinical development team and ensured seamless and robust execution of successful clinical development programs aligned with corporate business strategy.
- Managed and achieved successful outcome at FDA Advisory Committee Meeting, and then achieved U.S. FDA marketing approval for first-in-class anemia drug.
- Achieved U.S. FDA marketing approval for the only injectable vitamin D3 drug in a vial to treat calcium deficiency in patients with hypoparathyroidism and metabolic bone disease.

- Led marketing programs for all new product launches, including forging relationships with KOL's to publish clinical abstracts and speak at industry conferences and educate key customers, positioning drug as innovative anemia therapy with superior safety and efficacy that improves patient lives.
- Led successful effort to secure special Medicare payment for FDA approved drug by gaining support of patient advocacy groups, patients, nephrologists, nurses, dialysis service providers and key Congressional leaders, including the Chairman of the U.S. Committee on Ways and Means, and the Chairman of the Sub Committee on Health of the Committee on Ways and Means, and the Secretary of the U.S. Department of Health and Human Services.
- Managed global business development, identified and assessed key markets, secured license agreements and established strategic alliances in China, Latin America, Canada and the U.S. to expand revenue and market share.
- Negotiated exclusive license agreement with Wanbang Biopharma (subsidiary of Shanghai FOSUN Pharmaceutical) to commercialize drug in China for $40 million cash including upfront payment and milestone payments, plus sales royalty and drug purchase, for expected yearly revenue of $250 million.
- Negotiated exclusive long-term product distribution agreement with Baxter International for $52.5 million cash, milestone payments and equity purchase, obtaining capital and maintaining profitability without selling business while keeping customer base and securing strategic global partner.
- Chairman and Director of public company for 23 years; managed Board and process, focused meetings on important business issues, implemented governance reforms, employed strategic interface with board members for discussion and input to help grow business, and utilized formal and informal between-meeting dialogue to execute strategic initiatives.

PRIOR EMPLOYMENT (1987 – 1994):

DIAL MEDICAL, DeLand, FL (acquired by Gambro Renal Care); *Sales Executive*

R. LOUIS ENTERPRISES., Novi, MI; *Owner/Sales Executive*

TRI-STATE HOSPITAL SUPPLY CORP., Howell, MI; *Sales Executive*

EDUCATION

Bachelor of Arts, Advertising (BA) • Michigan State University, East Lansing, Michigan (1987)

Accolades and Professional Associations:

40 Under 40 Crain's Detroit Business (2001)

Ernst & Young Entrepreneur of Year Michigan Great Lakes Region (2005)

Medical Main Street Board Member, MI (2000-2018)