Clive Richardson Interim Chief Executive Officer Akari Therapeutics Plc 75/76 Wimpole Street London W1G 9RT United Kingdom

> Re: Akari Therapeutics Plc Registration Statement on Form F-1 Filed October 9, 2018 File No. 333-227752

Dear Mr. Richardson:

We have limited our review of your registration statement to those issues we have addressed in our comment.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to this comment, we may have additional comments.

Form F-1 Filed October 9, 2018

## General

1. Given the nature of the offering and size of the transaction relative to the number of

outstanding shares held by non-affiliates, please advise us of your basis for determining

that the transaction is appropriately characterized as a transaction that is eligible to be  $\begin{tabular}{ll} \hline \end{tabular}$ 

made on a shelf basis under Rule 415(a)(1)(i).

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.

Clive Richardson

Akari Therapeutics Plc

October 25, 2018

Page 2

Refer to Rules 460 and 461 regarding requests for acceleration. Please allow adequate time for us to review any amendment prior to the requested effective date of the registration statement.

You may contact Jeffrey Gabor at 202-551-2544 or Joe McCann at 202-551-6262 with any questions.

Sincerely,

FirstName LastNameClive Richardson

Division of

Corporation Finance Comapany NameAkari Therapeutics Plc

Office of Healthcare

& Insurance
October 25, 2018 Page 2
cc: Heidi Steele, Esq.
FirstName LastName