

Roth Capital Partners, LLC
888 San Clemente Drive
Newport Beach, CA 92660

National Securities Corporation
120 Broadway, 27th Floor
New York, NY 10271

July 22, 2013

Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Tonix Pharmaceuticals Holding Corp. (the "Company")
Registration Statement on Form S-1 (File No. 333-188547)

Ladies and Gentlemen:

In connection with the above-captioned registration statement, and pursuant to Rule 461 under the Securities Act of 1933, as amended (the "Act"), the undersigned hereby joins in the request of the Company that the effective date of such registration statement be accelerated to 4:00 p.m. (New York Time) on Wednesday, July 24, 2013, or as soon thereafter as practicable.

In making this request the undersigned acknowledges that it is aware of its obligations under the Act as they relate to the public offering of securities pursuant to the registration statement.

Very truly yours,

ROTH CAPITAL PARTNERS, LLC

NATIONAL SECURITIES CORPORATION

By: /s/ AARON GUREWITZ
Name: Aaron Gurewitz
Title: Head of Equity Capital Markets

By: /s/ JONATHAN RICH
Name: Jonathan Rich
Title: Head of Investment Banking
