

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

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

July 24, 2013

VIA EDGAR

United States Securities
and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Washington, D.C. 20549

Attention: Adam Turk, Esq.

Re: Tonix Pharmaceuticals Holding Corp.
Registration Statement on Form S-1
File No. 333-188547

Ladies and Gentlemen:

The undersigned hereby join in the request of the Company to withdraw the request for acceleration dated July 22, 2013, of the effective date of the registration statement referred to above that was requested to become effective at 4:00 p.m., Washington D.C. time, on Wednesday, July 24, 2012, or as soon thereafter as practicable.

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
