

June 11, 2019

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549-0405

**Re: MYnd Analytics, Inc.  
Registration Statement on Form S-4  
File No. 333-229660**

Ladies and Gentlemen:

Pursuant to Rules 460 and 461 of the General Rules and Regulations under the Securities Act of 1933, as amended, MYnd Analytics, Inc. (the "Company") hereby requests that the Securities and Exchange Commission (the "Commission") accelerate the effective date of the above-referenced Registration Statement and declare such Registration Statement effective as of 5:00 p.m. Eastern Time, on Monday, June 11, 2019, or at such later time as the Company or its counsel, Dentons US LLP, may orally request via telephone call to the staff (the "Staff") of the Commission. The Company also requests that the Commission specifically confirm such effective date and time to the Company.

If you have any further comments or require any further information or if any questions should arise in connection with this submission, please call Mr. Don D'Ambrosio at (949) 420-4402 or Mr. Jeffrey Baumel at (973) 912-7189 at Dentons US, LLP.

Very truly yours,

/s/ Don D'Ambrosio

Don D'Ambrosio  
Chief Financial Officer