



DIVISION OF  
CORPORATION FINANCE

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

February 23, 2022

Joshua Disbrow  
Chief Executive Officer  
Aytu Biopharma, Inc.  
373 Inverness Parkway, Suite 206  
Englewood, Colorado 80112

**Re: Aytu Biopharma, Inc.**  
**Form 10-K for the Fiscal Year Ended June 30, 2021**  
**Filed September 28, 2021**  
**File No. 001-38247**

Dear Mr. Disbrow:

We have completed our review of your filings. 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.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences