

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

May 8, 2025

Jack Ross Chief Executive Officer Synergy CHC Corp. 865 Spring Street Westbrook, Maine 04092

Re: Synergy CHC Corp.

Draft Registration Statement on Form S-1
Submitted May 5, 2025
CIK No. 0001562733

Dear Jack Ross:

This is to advise you that we do not intend to review your registration statement.

We request that you publicly file your registration statement at least two business days prior to the requested effective date and time. Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Chris Edwards at 202-551-6761 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Michael K. Bradshaw, Jr.