



DIVISION OF  
CORPORATION FINANCE

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

June 18, 2019

Robert J. Gould  
President and Chief Executive Officer  
Fulcrum Therapeutics, Inc.  
26 Landsdowne Street  
Cambridge, MA 02139

**Re: Fulcrum Therapeutics, Inc.  
Amendment No. 1 to Draft Registration Statement on Form S-1  
Submitted June 6, 2019  
CIK No. 0001680581**

Dear Dr. Gould:

We have reviewed your amended draft registration statement and have the following comment. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. If you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing the information you provide in response to the comment and your amended draft registration statement or filed registration statement, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our May 28, 2019 letter.

Amendment No. 1 to DRS

Intellectual Property, page 126

1. We note your response to prior comment 17 that you do not own any patents. However, your disclosure continues to indicate that you own patents as you state that the "patent portfolio for losmapimod is based upon Fulcrum-owned and in-licensed patent families. . ." Please revise your disclosure accordingly, here and elsewhere as appropriate, to remove any discrepancies.

Robert J. Gould  
Fulcrum Therapeutics, Inc.  
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You may contact Mary Mast at 202-551-3613 or Mark Brunhofer at 202-551-3638 if you have questions regarding comments on the financial statements and related matters. Please contact Dorrie Yale at 202-551-8776 or Joe McCann at 202-551-6262 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Healthcare & Insurance

cc: Lia Der Marderosian - WilmerHale