

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

July 27, 2020

John W. Smither Chief Financial Officer Arcutis Biotherapeutics, Inc. 2945 Townsgate Road, Suite 110 Westlake Village, California 91361

Re: Arcutis Biotherapeutics, Inc.
Draft Registration Statement on Form S-1
Submitted July 21, 2020
CIK No. 0001787306

Dear Mr. Smither:

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

We request that you publicly file your registration statement no later than 48 hours 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 Tim Buchmiller at (202) 551-3635 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Brian J. Cuneo, Esq.