

March 28, 2011

VIA U.S. MAIL AND FAX (305)856-7342

Lawrence I. Rothstein
Director, President, Treasurer, Secretary and Principal Financial Officer
HMG/Courtland Properties, Inc.
1870 S. Bayshore Drive
Coconut Grove, Florida 33133

**Re: HMG/Courtland Properties, Inc
Form 10-K for Fiscal Year Ended
December 31, 2009
Filed March 30, 2010
File No. 001-07865**

Dear Mr. Rothstein:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Kevin Woody
Accounting Branch Chief