

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

November 15, 2023

Joshua Fine Chief Financial Officer Cyclo Therapeutics, Inc. 6714 NW 16th Street, Suite B Gainesville, FL 32653

Re: Cyclo Therapeutics, Inc.
Registration Statement on Form S-4
Filed November 7, 2023
File No. 333-275371

Dear Joshua Fine:

This is to advise you that we have not reviewed and will not review your registration statement.

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 Jimmy McNamara at 202-551-7349 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Alison Newman