

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

February 14, 2025

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

> Re: Cyclo Therapeutics, Inc. Form 10-K for Fiscal Year Ended December 31, 2023 File No. 001-39780 Filed March 18, 2024

Dear Joshua M. Fine:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Alison Newman