



DIVISION OF
CORPORATION FINANCE

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

April 8, 2025

Timothy Warbington
Chief Executive Officer
Creative Medical Technology Holdings, Inc.
211 E Osborn Road
Phoenix, AZ 85012

Re: Creative Medical Technology Holdings, Inc.
Registration Statement on Form S-3
Filed April 2, 2025
File No. 333-286346

Dear Timothy Warbington:

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 Tyler Howes at 202-551-3370 with any questions.

Sincerely,

Division of Corporation Finance
Office of Life Sciences

cc: Zev M. Bomrind, Esq.