

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

DIVISION OF CORPORATION FINANCE

October 7, 2020

John Albright Chief Executive Officer CTO Realty Growth, Inc. 1140 N. Williamson Blvd. Suite 140 Daytona Beach, FL 32114

> Re: CTO Realty Growth, Inc. Form S-3 Filed October 1, 2020 File No. 333-249209

Dear Mr. Albright:

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 Stacie Gorman at 202-551-3585 with any questions.

Sincerely,

Division of Corporation Finance Office of Real Estate & Construction

cc: Robert B. Robbins, Esq.