



New York Stock Exchange  
11 Wall Street  
New York, NY 10005

January 29, 2021

Chief, Information Technology  
Securities and Exchange Commission  
Division of Corporate Finance  
100 F Street, NE MS 3040  
Washington, DC 20549

To whom it may concern:

The New York Stock Exchange certifies its approval for listing and registration of the Common Stock, par value \$0.01 per share, of CTO Realty Growth, Inc. (name to be changed from CTO NEWCO REIT, Inc.) under the Exchange Act of 1934.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Savage". The signature is written in a cursive style with a long, sweeping underline.