

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

December 15, 2020

Anthony J. Cataldo Chief Executive Officer GT Biopharma, Inc. 9350 Wilshire Blvd. Suite 203 Beverly Hills, CA 90212

Re: GT Biopharma, Inc.
Registration Statement on Form S-1
Filed December 11, 2020
File No. 333-251311

Dear Mr. Cataldo:

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 Tim Buchmiller at (202) 551-3635 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: Roger W. Bivans, Esq.