

June 29, 2020

Seth L. Kaplan
Senior Vice President, General Counsel, and Secretary
Griffon Corporation
725 Fifth Avenue, 18th Floor
New York, NY 10019

Re: Griffon Corporation
Registration

Statement on Form S-4

Filed June 23, 2020
File No. 333-239373

Dear Mr. Kaplan:

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 Edward M. Kelly, Senior Counsel, at (202) 551-3728 with any questions.

Sincerely,

Division of Corporation Finance
Office of Manufacturing

cc:

Martin Nussbaum, Esq.