

September 14, 2022

Salvatore Palella
Chief Executive Officer
Helbiz, Inc.
32 Old Slip
New York, NY 10005

Statement on Form S-1
7, 2022

Re: Helbiz, Inc.
Registration

Filed on September
File No. 333-267312

Dear Mr. Palella:

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 Janice Adeloyle at 202-551-3034 or Cara Wirth 202-551-7127 with any questions.

Sincerely,

Division of Corporation Finance
Office of Trade & Services