

November 8, 2021

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

Statement on Form S-1
2021

Re: Helbiz, Inc.
Registration

Filed October 27,

File No. 333-260536

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.

Lichtenfels at 703-434-0122 with any questions.

Please contact Ryan

Sincerely,

Division of Corporation Finance

Office of Trade & Services

cc:

William S. Rosenstadt