

AYRO, Inc.
900 E. Old Settlers Boulevard, Suite 100
Round Rock, Texas 78664

August 10, 2020

VIA EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance

Washington, D.C. 20549
Attention: Edwin Kim

Re: AYRO, Inc.
Registration Statement on Form S-3
Filed on August 3, 2020
File No. 333-240314 (the "**Registration Statement**")
Request for Acceleration

Ladies and Gentlemen:

Pursuant to Rule 461 of the Rules and Regulations of the Securities and Exchange Commission (the "**Commission**") under the Securities Act of 1933, as amended, AYRO, Inc. (the "**Company**") hereby respectfully requests acceleration of the effective date of the Registration Statement so that it may become effective at 5:00 p.m., Eastern Time, on August 11, 2020, or as soon thereafter as practicable.

Should any member of the staff of the Commission have any questions or comments with respect to this request, please contact our counsel, Haynes and Boone, LLP, attention: Matthew L. Fry, Esq. at (214) 651-5443.

Very truly yours,

AYRO, INC.

By: /s/ Curtis Smith
Curtis Smith
Chief Financial Officer

cc: Rick A. Werner, Esq., Haynes and Boone, LLP
Matthew L. Fry, Esq., Haynes and Boone, LLP
