

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

August 13, 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, as amended on August 12, 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, as amended, so that it may become effective at 5:00 p.m., Eastern Time, on August 14, 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

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