

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

October 21, 2022

David Gandini Chief Executive Officer SOBR Safe, Inc. 6400 S. Fiddlers Green Circle, Suite 1400 Greenwood Village, CO 80111

Re: SOBR Safe, Inc.
Registration Statement on Form S-1
Filed October 14, 2022
File No. 333-267882

Dear David Gandini:

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 Alex King at 202-551-8631 with any questions.

Sincerely,

Division of Corporation Finance Office of Manufacturing