

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

December 22, 2021

Evan Sohn Chief Executive Officer Recruiter.com Group, Inc. 500 Seventh Avenue New York, New York 10018

> Re: Recruiter.com Group, Inc. Registration Statement on Form S-1 Filed December 17, 2021 File No. 333-261734

Dear Mr. Sohn:

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 Priscilla Dao, Staff Attorney, at (202) 551-5997 or Jan Woo, Legal Branch Chief, at (202) 551-3453 with any questions.

Sincerely,

Division of Corporation Finance Office of Technology

cc: Steven Lipstein