

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

February 4, 2021

Phillip L. Kumnick Chief Executive Officer Ipsidy Inc. 670 Long Beach Boulevard Long Beach, New York 11561

Re: Ipsidy Inc.

Preliminary Proxy Statement on Schedule 14A

Filed January 15, 2021 File No. 000-54545

Dear Mr. Kumnick:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance Office of Technology

cc: Stephen M. Fleming, Esq.