



DIVISION OF
CORPORATION FINANCE

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

December 28, 2021

McKeel O Hagerty
Chief Executive Officer
Hagerty, Inc.
121 Drivers Edge
Traverse City, MI 49684

Re: Hagerty, Inc.
Registration Statement on Form S-1
Filed December 21, 2021
File No. 333-261810

Dear Mr. Hagerty:

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 John Dana Brown at 202-551-3859 with any questions.

Sincerely,

Division of Corporation Finance
Office of Finance