



DIVISION OF  
CORPORATION FINANCE

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

May 15, 2023

Scott Mathis  
Chief Executive Officer  
Gaucho Group Holdings, Inc.  
112 NE 41st Street, Suite 106  
Miami, FL 33137

**Re: Gaucho Group Holdings, Inc.**  
**Registration Statement on Form S-1**  
**Filed May 9, 2023**  
**File No. 333-271761**

Dear Scott Mathis:

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 Pearlyne Paulemon at 202-551-8714 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Real Estate & Construction

cc: Victoria Bantz