

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

April 18, 2024

Lior Tal Chief Executive Officer Cyngn Inc. 1015 O'Brien Dr. Menlo Park, CA 94025

Re: Cyngn Inc.

Registration Statement on Form S-1

Filed April 12, 2024 File No. 333-278671

Dear Lior Tal:

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 Aliya Ishmukhamedova at 202-551-7519 or Matthew Derby at 202-551-3334 with any questions.

Sincerely,

Division of Corporation Finance Office of Technology

cc: Marcelle S. Balcombe