

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

DIVISION OF CORPORATION FINANCE

February 8, 2024

Paul Mobley Chief Financial Officer Noble Roman's Inc. 6612 E. 75th Street Suite 450 Indianapolis, IN 46250

Re: Noble Roman's Inc. Form 10-K for the Fiscal Year Ended December 31, 2022 File No. 000-11104

Dear Paul Mobley:

We have completed our review of your filings. 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 Trade & Services