

August 21, 2020

David W. Hult
President and Chief Executive Officer
Asbury Automotive Group, Inc.
2905 Premiere Parkway NW, Suite 300
Duluth, GA 30097

Group, Inc.

Statement on Form S-4
2020

Re: Asbury Automotive

Registration

Filed August 14,

File No. 333-246335

Dear Mr. Hult:

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 Cara

Wirth at (202) 551-7127 with any questions.

Sincerely,

Division of Corporation Finance

Office of Trade & Services

cc:

Joel T. May, Esq.