



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3233

January 8, 2018

Via E-Mail

Lawrence A. Goodfield, Jr.  
Chief Financial Officer  
111 W 19th St., 8th Floor  
New York, NY 10011

**Re: Drive Shack Inc.  
Registration Statement on Form S-3  
Filed December 27, 2017  
File No. 333-222312**

Dear Mr. Goodfield:

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 Joshua Lobert, Staff Attorney, at (202) 551-7150 with any questions.

Sincerely,

/s/ Tom Kluck

Tom Kluck  
Legal Branch Chief  
Office of Real Estate and  
Commodities

cc: Michael Schwartz, Esq.  
Skadden, Arps, Slate, Meagher & Flom LLP