



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

DIVISION OF  
CORPORATION FINANCE

July 7, 2020

Glenn Laken  
Chief Executive Officer  
CMG Holdings Group, Inc.  
2130 North Lincoln Park West 8N  
Chicago, IL 60614

**Re: CMG Holdings Group, Inc.**  
**Amendment No. 3 to Registration Statement on Form 10**  
**Filed on June 25, 2020**  
**File No. 000-51770**

Dear Mr. Laken:

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

cc: Ben Borgers