

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

January 11, 2021

Jeff Whiteside Chief Financial Officer EXP World Holdings, Inc. 2219 Rimland Drive, Suite 301 Bellingham, WA. 98226

> Re: EXP World Holdings, Inc. Form 10-K for the year ended December 31, 2019 Filed on March 12, 2020 File No. 001-38493

Dear Mr. Whiteside:

We have completed our review of your filing. 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 Real Estate & Construction