



DIVISION OF
CORPORATION FINANCE

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