



DIVISION OF  
CORPORATION FINANCE

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

January 8, 2024

Martin P. Klein  
Chief Financial Officer  
Athene Holding Ltd  
Second Floor, Washington House  
16 Church Street  
Hamilton, HM 11, Bermuda

**Re: Athene Holding Ltd**  
**Form 10-K for the Fiscal Year Ended December 31, 2022**  
**File No. 001-37963**

Dear Martin P. Klein:

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 Finance