



James C. Yong
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July 8, 2025

VIA KITEWORKS SECURE FILE TRANSFER

Ms. Vanessa Countryman
Secretary
United States Securities and Exchange Commission
100 F. Street, NE
Washington, DC 20549-7010

Re: In the Matter of the Application of
Dream Exchange Holdings, Inc. for Registration as a National Securities Exchange,
File No. 010 - 00248

Dear Ms. Countryman:

Dream Exchange Holdings, Inc. is filing the enclosed amendment to its Form 1 application for registration as a national securities exchange. The amendment consists of the following:

1. Fully executed Form 1 cover page for its Amendment;
2. Revised Exhibits A, A-2, B-1, C, C-2, C-4, C-6, J, and K (including comparison documents to show the changes that were made from our original filing); and
3. Added Exhibit C-3(a) and renamed what was formerly Exhibit C-3 as Exhibit C-3(b).

If you or any member of the staff of the Securities and Exchange Commission have any questions, please call me at (312) 585-6051.

Very truly yours,

/s/ James C. Yong

James C. Yong

Enclosures

cc: Mr. Richard Holley, III, Securities and Exchange Commission
Ms. Cristie March, Securities and Exchange Commission
Mr. Christopher Chow, Securities and Exchange Commission
Ms. Rebekkah Liu, Securities and Exchange Commission
Mr. David Michehl, Securities and Exchange Commission
Mr. Joseph Cecala, Dream Exchange Holdings, Inc.
Ms. Stephanie Schaefer, Dream Exchange Holdings, Inc.