



James C. Yong  
Chief Legal and Regulatory Officer  
(312) 585-6051  
jyong@dreamex.com

July 16, 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 No. 2 to its Form 1 application for registration as a national securities exchange. Amendment No. 2 consists of the following:

1. Fully executed Form 1 cover page for its Amendment; and
2. Revised Exhibits C-2, C-4, C-6, and K (including comparison documents to show the changes that were made from Amendment No. 1).

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,

A blue ink signature of James C. Yong, consisting of a stylized first name and a surname that appears to be "Yong".

James C. Yong

Enclosures

cc: Mr. Richard Holley, III, Securities and Exchange Commission  
Ms. Cristie March, Securities and Exchange Commission  
Ms. Jennifer Dodd, Securities and Exchange Commission  
Mr. David Michehl, Securities and Exchange Commission  
Mr. Joseph J. Cecala, Jr., Dream Exchange Holdings, Inc.  
Ms. Stephanie Schaefer, Dream Exchange Holdings, Inc.