

November 25, 2022

Ross Levinsohn
Chief Executive Officer
Arena Group Holdings, Inc.
200 Vesey Street
24th Floor
New York, New York 10281

Holdings, Inc.

fiscal year ended December 31, 2021

Re: Arena Group

Form 10-K for the

Filed April 1, 2022

File No. 001-12471

Dear Ross Levinsohn:

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 Technology