



DIVISION OF
CORPORATION FINANCE

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

September 22, 2025

Andrej Jonovic
Chief Executive Officer
XBP Global Holdings, Inc.
6641 N. Belt Line Road, Suite 100
Irving, TX 75061

**Re: XBP Global Holdings, Inc.
Registration Statement on Form S-3
Filed September 12, 2025
File No. 333-290237**

Dear Andrej Jonovic:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Kate Beukenkamp at 202-551-3861 with any questions.

Sincerely,

Division of Corporation Finance
Office of Trade & Services

cc: Erik Mengwall