



DIVISION OF
CORPORATION FINANCE

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

September 27, 2024

David Steinberg
Chief Executive Officer
Zeta Global Holdings Corp.
3 Park Avenue, 33rd Floor
New York, NY 10016

Re: Zeta Global Holdings Corp.
Definitive Proxy Statement on Schedule 14A
Filed April 26, 2024
File No. 001-40464

Dear David Steinberg:

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
Disclosure Review Program