

May 13, 2025

U.S. Securities and Exchange Commission Division of Corporation Finance 100 F Street, NE Washington, D.C. 20549

RE: VanEck Funds

Issuer CIK: 0000768847

Issuer File Number: 002-97596 / 811-04297

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To Whom It May Concern:

Cboe BZX Exchange, Inc. certifies its approval for listing and registration of the VanEck Onchain Economy ETF under the Exchange Act of 1934.

Sincerely,

Charles Sullivan

Senior Analyst, Listing Qualifications