



DIVISION OF  
CORPORATION FINANCE

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

April 25, 2025

John Belizaire  
Chief Executive Officer  
Soluna Holdings, Inc.  
325 Washington Ave Extension  
Albany, NY 12205

**Re: Soluna Holdings, Inc.**  
**Registration Statement on Form S-3**  
**Filed April 18, 2025**  
**File No. 333-286638**

Dear John Belizaire:

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 David Gessert at 202-551-2326 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Crypto Assets