



DIVISION OF  
CORPORATION FINANCE

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

July 22, 2019

David L. Edgar  
Controller and Acting Chief Financial Officer  
OptimumBank Holdings, Inc.  
2477 East Commercial Blvd.  
Fort Lauderdale, FL 33308

**Re: OptimumBank Holdings, Inc.**  
**Preliminary Proxy Statement on Schedule 14A**  
**Filed April 22, 2019**  
**File No. 000-50755**

Dear Mr. Edgar:

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 Financial Services

cc: Tom Cookson, Esq.