



DIVISION OF  
CORPORATION FINANCE

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

August 14, 2024

Rhonda Keaveney  
Chief Executive Officer  
Invech Holdings, Inc.  
7339 E. Williams Drive  
Unit 26496  
Scottsdale, AZ 85255

**Re: Invech Holdings, Inc.**  
**Amendment No. 8 to Registration Statement on Form S-1**  
**Filed August 6, 2024**  
**File No. 333-276779**

Dear Rhonda Keaveney:

We have reviewed your amended registration statement and have the following comment(s).

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe a comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to this letter, we may have additional comments. Unless we note otherwise, any references to prior comments are to comments in our August 1, 2024 letter.

Amendment No. 8 to Form S-1 filed August 6, 2024

Certain Relationships and Related Transactions, and Director Independence, page 50

1. We note your revised disclosure pursuant to comment 2 and reissue in part. Please disclose each transaction disclosed in Note 7 of the interim financial statements, specifically the additional \$16,159 advance from SCC.

Please contact Stephen Kim at 202-551-3291 or Joel Parker at 202-551-3651 if you have questions regarding comments on the financial statements and related matters. Please contact Jenna Hough at 202-551-3063 or Donald Field at 202-551-3680 with any other questions.

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Sincerely,

Division of Corporation Finance  
Office of Trade & Services