



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3561

November 2, 2018

Via E-mail  
Peng Yang  
President and Director  
Oranco, Inc.  
One Liberty Plaza, Suite 2310 PMB# 21  
New York, NY 10006

**Re: Oranco, Inc.  
Amendment No. 2 to Current Report on Form 8-K  
Filed October 4, 2018  
Amendment to Annual Report on Form 10-K  
Filed October 26, 2018  
File No. 000-28181**

Dear Mr. Yang:

We have reviewed your filing and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response and any amendment you may file in response to these comments, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our October 15, 2018 letter.

Amendment to Form 10-K for Fiscal Year Ended June 30, 2018

Consolidated Statements of Cash Flows, page F-6

1. We note your response to comment 3 and revisions made to the statements of cash flows included in Amendment No. 3 to Form 8-K. Please further revise your statements of cash flows for fiscal years ended June 30, 2018 and June 30, 2017 included in your Form 10-K to reclassify your payments to acquire additional non-controlling interest in Fenyang Jinqiang Wine Co., Ltd as financing activities.

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Oranco, Inc.  
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You may contact Suying Li, Staff Accountant, at (202) 551-3335 or Craig Arakawa, Accounting Branch Chief, at (202) 551-3650 if you have questions regarding comments on the financial statements and related matters. Please contact Ruairi Regan, Staff Attorney, at (202)551-3269 or Pamela Howell at (202) 551-3357 with any other questions

Sincerely,

/s/ Pamela Howell  
for

John Reynolds  
Assistant Director  
Office of Beverages,  
Apparel and Mining

cc: George Du, Esq.  
Hunter Taubman Fischer & Li, LLC