



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

DIVISION OF  
CORPORATION FINANCE

July 13, 2015

Via E-mail

Greg Lemaich  
General Counsel  
Polar Securities Inc.  
401 Bay Street, Suite 1900  
P.O. Box 19  
Toronto, ON M5H 2Y4, Canada

**Re: Central GoldTrust  
Schedule 13D/A filed by Polar Securities Inc.  
Filed May 5, 2015  
File No. 005-87886**

Dear Mr. Lemaich:

We have reviewed the above-referenced filing and have the following comment.

Please respond to this letter by amending the filing, by providing the requested information, or by advising us when you will provide the requested response. If you do not believe our 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 the filing and the information you provide in response to this comment, we may have additional comments.

1. Please supplementally advise us of any contacts, arrangements or agreements (whether oral or in writing) between Polar Securities Inc. (or any affiliates thereof) and Sprott Asset Management LP or Pekin Singer Strauss Asset Management, Inc. (or any of their respective affiliates) with respect to units of Central GoldTrust during the period commencing around Central GoldTrust's 2015 Annual and Special Meeting of Unitholders through the date of your response.

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Please contact me at (202) 551-3589 or Mellissa Campbell Duru, Special Counsel, at (202) 551-3757 if you have any questions regarding our comment.

Sincerely,

/s/ Tiffany Piland Posil

Tiffany Piland Posil  
Special Counsel  
Office of Mergers and Acquisitions