



DIVISION OF  
CORPORATION FINANCE  
MAIL STOP 7010

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

November 13, 2006

via U.S. Mail

Jacques Mot  
Chairman and Chief Executive Officer  
New Generation Holdings, Inc.  
245 Park Avenue  
New York, NY 10167

**Re: New Generation Holdings, Inc.  
Amendment No. 1 to Preliminary Proxy Statement on Schedule 14A  
File No. 0-24623  
Annual Report on Form 10-KSB for the Fiscal Year Ended December 31,  
2005, as amended  
Quarterly Reports on Form 10-QSB for the Period Ended March 31, 2006  
and June 30, 2006  
Response Letter Dated November 13, 2006  
File No. 0-24623**

**Platinum Corp.  
Amendment No. 1 to Registration Statement on Form 10-SB  
Response Letter Dated November 13, 2006  
File No. 0-52128**

Dear Mr. Mot:

We have reviewed your filings and have the following comments. Where indicated, we think you should revise your document in response to these comments. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Mr. Mot  
New Generation Holdings, Inc.  
Platinum Corp.  
November 17, 2006  
page 2

**New Generation Holdings, Inc.**

General

1. We note that you have not submitted your most recent correspondence, dated November 13, 2006, to EDGAR. Please assure that you have submitted all correspondence to EDGAR.

Form 10-KSB/A for the Fiscal Year Ended December 31, 2005

Financial Statements

Note I Convertible Note Payable to Related Party, page F-14

2. We note your response to prior comment one in which you have concluded that your convertible debt is conventional convertible and therefore would qualify for permanent equity classification. Please note, in order for the embedded conversion option to qualify for the scope exception of paragraph 11(a) of SFAS 133 the embedded conversion option must be both indexed to NGH's own stock and classified in stockholders' equity. Please tell us how you concluded that your stock is solely indexed to NGH's own stock given that it is also convertible into preferred shares of New Generation Plastics (now named Platinum) at December 31, 2005. Additionally, we note the contingent conversion terms as provided in Section II.5(ii) of the Certificate of Designations Preferences and Rights of your Series A Preferred Shares as filed on July 12, 2006 on Form 8-K, which provides that once the conversion contingencies are met, ultimate settlement of the convertible debt may result in the issuance of Platinum common shares. As such please include in your response how you considered the provision of EITF 01-06.

Form 10-QSB for the Quarterly Period Ended June 30, 2006

General

3. We note your response to prior comment three. Please revise your financial statements and disclosures as necessary to comply with all applicable comments written on Form 10-KSB above.

**Platinum Corp.**

Form 10-SB Filed February 12, 2006

General

4. We note that you have only submitted your correspondence dated November 13, 2006 to EDGAR. Please submit all previous correspondence relating to Platinum to EDGAR.

Financial Statements

Note A Summary of Accounting Policies, F-7

Basis of Presentation

5. We note that your response to prior comment four and six and continue to require further information regarding your analysis and conclusion that your allocation method attributing seventy-five percent of general and administrative expenses to Platinum is reasonable and supportable. In addition, it is unclear how you have concluded that no costs which you characterize as interest and financing expense are attributed to Platinum. Please provide us a detail narrative describing the supportability of your cost allocations to Platinum. We would expect your explanation to provide sufficient detail such that it is evident that the method you have applied is supportable and reasonable and that all costs of doing business have been appropriately attributed to Platinum.

Financial Statements for the Quarterly Period Ended June 30, 2006

General

6. We note your response to prior comment seven. Please revise your financial statements and disclosures as necessary to comply with all applicable comments written on Form 10-SB above.

Closing Comments

As appropriate, please amend your filing and respond to these comments within 10 business days or tell us when you will provide us with a response. You may wish to provide us with marked copies of the amendment to expedite our review. Please furnish a cover letter with your amendment that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

Mr. Mot  
New Generation Holdings, Inc.  
Platinum Corp.  
November 17, 2006  
page 4

You may contact Jonathan Duersch at (202) 551-3740 or Jill Davis, Accounting Branch Chief at (202) 551-3683 if you have questions regarding comments on the financial statements and related matters. Please contact me at (202) 551-3685 with any other questions. Direct all correspondence to the following ZIP code: 20549-7010.

Sincerely,

Roger Schwall  
Assistant Director

**via facsimile**  
Alan Ederer, Esq.  
(516) 622-9212