



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

Mail Stop 3720

April 9, 2009

Michael E. Weksel  
Alyst Acquisition Corp.  
233 East 69<sup>th</sup> Street, Suite 6J  
New York, NY 10021

**Re: Alyst Acquisition Corp.  
Form 10-KSB for Fiscal Year Ended June 30, 2008  
Filed September 25, 2008  
Form 10-Q for Quarter Ended September 30, 2008  
Filed November 10, 2008  
File No. 001-33563**

Dear Mr. Weksel:

We have completed our review of your Form 10-KSB and Form 10-QSB and have no further comments at this time. Please note, however, that we will continue to review the preliminary proxy statement you filed January 30, 2009 and the related registration statement on Form S-4 filed by China Networks International Holdings Ltd. on the same date.

Sincerely,

/s/ Celeste M. Murphy  
Legal Branch Chief

cc: Peter J. Rooney, Esq.  
McDermott Will & Emery LLP  
Via facsimile: (212) 547-5444