



DIVISION OF
CORPORATION FINANCE

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

December 14, 2011

Via E-mail

Mr. Yau Wai Hung
Chief Executive Officer
Great China Mania Holdings, Inc.
203 Hankow Center
5-15 Hankow Road
Tsimshatsui, Kowloon, Hong Kong

Re: Great China Mania Holdings, Inc.
Form 10-K for the year ended December 31, 2010
Filed April 15, 2011
File No. 000-54446

Dear Mr. Yau:

We have reviewed your response dated November 23, 2011 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 this letter within ten business days by amending your filing, by providing the requested information, or by advising us when you will provide the requested response. If you do not believe our comments apply 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 filing and the information you provide in response to these comments, we may have additional comments.

Annual Report on Form 10-K for the year ended December 31, 2010

Financial Statements, page F-1

Notes to Consolidated Financial Statements, page F-7

Note 3 – Disposal of GEBD BVI, page F-8

1. We note from your response to our prior comment 1 that the company accounted for the sale of GEBD BVI as a reversal of a reverse merger rather than a sale of a business and that the difference between the assets transferred and the consideration received, which consisted of 31,498,000 shares of common stock, was accounted for as an equity

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transaction in the company's financial statements. Given that assets were sold in return for consideration, which consisted of 31,498,000 shares of your common stock and the fact that a period of over two years has elapsed since the completion of the original reverse merger transaction, we continue to believe that such transaction represented the sale of a business for which a loss should be recognized in the company's 2010 financial statements. Please revise the company's financial statements to properly account for the transaction as the disposal of a business rather than an equity transaction in the company's financial statements.

Quarterly Report on Form 10-Q for the quarter ended September 30, 2011

Financial Statements, page 1

Notes to Condensed Consolidated Financial Statements (Unaudited), page 6

Note 18 - Pro Forma Statements of Income, page 14

2. We note your response to our prior comment 3 and reissue. Based on the disclosures provided in Note 18 to your financial statements and your reports on Forms 10-Q for the quarters ended March 31, 2011, June 30, 2011, and September 30, 2011, it appears that you have excluded the results of your discontinued operations of GEBD BVI from the statements of operations for each period. Please revise to include the results of operations for the operations that were disposed of during 2010 as a separate line item entitled "discontinued operations" in your statements of operations for the quarters ended March 31, 2011, June 30, 2011, and September 30, 2011. Refer to the guidance outlined in ASC 205-20-45. Please note that we do not believe there is any basis for excluding these results of operations from your statement of operations for periods that precede the sale or disposal date.

You may contact Heather Clark at 202-551-3624 or me at 202-551-3813 if you have questions regarding comments on the financial statements and related matters.

Sincerely,

/s/ Linda Cvrkel

Linda Cvrkel
Branch Chief