



DIVISION OF  
CORPORATION FINANCE

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

October 10, 2012

Via E-mail

Jazy Zhang  
Chief Financial Officer  
Giant Interactive Group Inc.  
11/F, No. 3 Building, 700 Yishan Road  
Shanghai, 200233  
People's Republic of China

**Re: Giant Interactive Group Inc.  
Form 20-F for the Fiscal Year Ended December 31, 2010  
Filed June 17, 2011  
Form 20-F for the Fiscal Year Ended December 31, 2011  
Filed April 23, 2012  
File No. 001-33759**

Dear Mr. Zhang:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Stephen Krikorian

Stephen Krikorian  
Accounting Branch Chief

cc: Via E-mail  
Portia Ku  
O'Melveny & Myers LLP