



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 3233

May 21, 2018

Via E-mail

Mr. Abid Chaudry
Head, Global Structured Products
Vaulted Gold Bullion Trust
3 Times Square
New York, NY 10036

**Re: Vaulted Gold Bullion Trust
Form 10-K
Filed January 26, 2018
Form 10-K/A
Filed May 4, 2018
File No. 333-194144**

Dear Mr. Chaudry:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Kevin Woody

Kevin Woody
Branch Chief
Office of Real Estate and
Commodities

Cc: Anna Pinedo (via E-mail)