



DIVISION OF  
CORPORATION FINANCE

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

February 2, 2021

Charles Strongo  
Chief Executive Officer  
Global Wholehealth Partners Corporation  
2227 Avenida Oliva  
San Clemente, California 92673

**Re: Global Wholehealth Partners Corporation**  
**Registration Statement on Form S-1**  
**Filed January 28, 2021**  
**File No. 333-252501**

Dear Mr. Strongo:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Kasey Robinson at 202-551-5880 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: Stephen Mills, Esq.