

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

January 30, 2024

Lirong Wang Chief Executive Officer Muliang Viagoo Technology, Inc. 2498 Wanfeng Highway, Lane 181 Fengjing Town, Jinshan District Shanghai, China

Re: Muliang Viagoo Technology, Inc.

Amendment No. 1 to Form 10-K for the fiscal year ended December 31, 2022 Filed July 6, 2023

File No. 001-40636

Dear Lirong Wang:

We issued comments to you on the above captioned filing on December 13, 2023. As of the date of this letter, these comments remain outstanding and unresolved. We expect you to provide a complete, substantive response to these comments by February 12, 2024. If you do not respond, we will, consistent with our obligations under the federal securities laws, decide how we will seek to resolve material outstanding comments and complete our review of your filing and your disclosure. Among other things, we may decide to release publicly, through the agency's EDGAR system, all correspondence, including this letter, relating to the review of your filings, consistent with the staff's decision to publicly release comment and response letters relating to disclosure filings it has reviewed. Please contact Al Pavot at 202-551-3738 or Terence O'Brien at 202-551-3355 with any questions on the accounting comment. Please contact Conlon Danberg at 202-551-4466 or Katherine Bagley at 202-551-2545 with any other questions.

Sincerely,

Division of Corporation Finance Office of Industrial Applications and Services

cc: Jason Ye, Esq.