

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

January 29, 2021

Xiaobo An Chairman and Chief Executive Officer Xiaobai Maimai Inc. Room 515, Floor 5 Jia No. 92-4 to 24 Jianguo Road Chaoyang District, Beijing 100020 People's Republic of China

> Re: Xiaobai Maimai Inc. Registration Statement on Form F-3 Filed January 26, 2021 File No. 333-252434

Dear Mr. An:

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 David Lin, Staff Attorney, at (202) 551-3552 with any questions.

Sincerely,

Division of Corporation Finance Office of Finance