



DIVISION OF  
CORPORATION FINANCE

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

July 1, 2019

Calvin Choi  
Chief Executive Officer  
AMTD International Inc.  
23/F Nexxus Building  
41 Connaught Road Central  
Hong Kong

**Re: AMTD International Inc.**  
**Registration Statement on Form F-1**  
**Filed June 20, 2019**  
**File No. 333-232224**

Dear Mr. Choi:

We have reviewed your registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

Form F-1 filed June 20, 2019

Exhibit Index

Exhibit 5.1, page II-4

1. We note that Appleby's opinion states that the "statements under the headings "Taxation", "Description of Share Capital" and "Enforceability of Civil Liabilities" insofar as such statements constitute statements of Cayman Islands law and only to the extent governed by the laws of the Cayman Islands, are accurate in all material respects." Please have Appleby revise their opinion to state that the description of tax consequences under Cayman Islands law in the registration statement constitutes counsel's opinion or advise.
2. We note counsel's statement that the "opinion is given solely for the benefit of the Company in connection with the matters referred to herein and, except with our prior

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written consent it may not be transmitted or disclosed to or used or relied upon by any other person or be relied upon for any other purpose whatsoever." Please have counsel revise to remove any implication that investors are not entitled to rely on the opinion. Please refer to Section II.B.3.d of the Division of Corporation Finance Staff Legal Bulletin No. 19 ("Legality and Tax Opinions in Registered Offerings") for guidance.

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.

Refer to Rules 460 and 461 regarding requests for acceleration. Please allow adequate time for us to review any amendment prior to the requested effective date of the registration statement.

You may contact Stephen Kim at 202-551-3291 or David Irving at 202-551-3321 if you have questions regarding comments on the financial statements and related matters. Please contact Jessica Livingston at 202-551-3448 or Michael Clampitt at 202-551-3434 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Financial Services