



DIVISION OF  
CORPORATION FINANCE

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

October 19, 2020

Zhenyu Wu  
Chief Financial Officer  
Elite Education Group International Ltd  
1209 N. University Blvd.  
Middletown, OH 45042

**Re: Elite Education Group International Ltd  
Amendment No. 6 to Draft Registration Statement on Form F-1  
Submitted October 13, 2020  
CIK 0001781397**

Dear Mr. Wu:

We have reviewed your amended draft 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 providing the requested information and either submitting an amended draft registration statement or publicly filing your registration statement on EDGAR. 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 the information you provide in response to these comments and your amended draft registration statement or filed registration statement, we may have additional comments.

Amendment No. 6 to Draft Registration Statement on Form F-1

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1. We note your response to our prior comment 1. In your next amendment, please update this section to reflect your response.

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2. We note your response to our prior comment 4. We also note that the Renda Agreement originally contemplated the payment of RMB 2.9 million for rent expense as well as other services including hiring, administration, and paying employees. Please disclose whether the new rental expense of \$1.0 million includes such other services and whether there have been changes in payment or fees with respect to such other services. If there has been a material amendment to the Renda Agreement, please include it as an exhibit.

You may contact Tony Watson at (202) 551-3318 or Doug Jones at (202) 551-3309 if you have questions regarding comments on the financial statements and related matters. Please contact Cara Wirth at (202) 551-7127 or Lilyanna Peyser at (202) 551-3222 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services

cc: F. Alec Orudjev, Esq.