



DIVISION OF  
CORPORATION FINANCE

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

June 15, 2023

Shangzhao Hong  
Chief Executive Officer  
Creative Global Technology Holdings Ltd  
Unit 03, 22/F, Westin Centre  
26 Hung To Road, Kwun Tong  
Kowloon, Hong Kong

**Re: Creative Global Technology Holdings Ltd**  
**Amendment No. 1 to Draft Registration Statement on Form F-1**  
**Submitted June 5, 2023**  
**CIK No. 0001967822**

Dear Shangzhao Hong:

We have reviewed your amended draft registration statement and have the following comment. In our comment, 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 comment applies 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 this comment and your amended draft registration statement or filed registration statement, we may have additional comments.

Amendment No. 1 to Draft Registration Statement on Form F-1 Submitted June 5, 2023

PRC Related Regulations Related to this Offering, page 11

1. We note your response to comments 8 and 14 and reissue in part. We acknowledge your new disclosure stating that according to "the legal advice" of JunHe LLP. Please clarify, if true, whether you have received an opinion of counsel from JunHe LLP. If you have not relied upon an opinion of counsel with respect to your conclusions, state as much and explain why such an opinion was not obtained.

Shangzhao Hong  
Creative Global Technology Holdings Ltd  
June 15, 2023  
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You may contact Aamira Chaudhry at 202-551-3389 or Adam Phippen at 202-551-3336 if you have questions regarding comments on the financial statements and related matters. Please contact Nicholas Nalbantian at 202-551-7470 or Donald Field at 202-551-3680 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services

cc: Lan Lou