



DIVISION OF  
CORPORATION FINANCE

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

January 6, 2025

Fufei Lin  
Chief Executive Officer  
Aigo Holding Ltd  
4th floor, Building No. 26, Ju Yuan Zhou Garden  
Jinshan Industrial Zone, 618 Jinshan Avenue, Jianxin Town  
Fuzhou City, Fujian Province, China 350028

**Re: Aigo Holding Ltd**  
**Amendment No. 5 to Draft Registration Statement on Form F-1**  
**Submitted December 26, 2024**  
**CIK No. 0002025255**

Dear Fufei Lin:

We have reviewed your amended draft registration statement and have the following comment(s).

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 a 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 letter and your amended draft registration statement or filed registration statement, we may have additional comments. Unless we note otherwise, any references to prior comments are to comments in our December 18, 2024 letter.

Amendment No. 5 to Draft Registration Statement on Form F-1 submitted December 26, 2024

Capitalization, page 50

1. We have reviewed your revisions in response to prior comment 2 and reissue. Please revise your capitalization table to include the company's indebtedness as of the most recent balance sheet date, including short and long-term borrowings and amounts due to related parties. Refer to Item 3.B of Form 20-F.

January 6, 2025

Page 2

Consolidated Statements of Cash Flows, page F-7

2. We have reviewed your revisions in response to prior comment 4 and reissue in part. The second page of your statements of cash flows provided on pages F-7 and F-34 continue to state the amounts are presented in RMB. Please revise accordingly.

General

3. Where you provide cross-references to risk factors related to the legal and operational risks associated with your operations in China, including on the prospectus cover page and in the summary risk factors beginning at page 5, please revise to include the page number at which the relevant risk factor appears, in addition to its title.

Please contact Abe Friedman at 202-551-8298 or Theresa Brilliant at 202-551-3307 if you have questions regarding comments on the financial statements and related matters. Please contact Rebekah Reed at 202-551-5332 or Dietrich King at 202-551-8071 with any other questions.

Sincerely,

Division of Corporation Finance  
Office of Trade & Services

cc: Yu Wang