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APEX WEALTH ENTERPRISES LTD

Form RW

November 06, 2003

APEX WEALTH ENTERPRISES LIMITED
Unit 1502, 15th Floor
Worldwide House
19 Des Voeux Road Central, Hong Kong

October 28, 2003

Michael Ferraro
Attorney-Advisor
Securities and Exchange Commission
Mail Stop 0304
450 Fifth Street, N.W.
Washington, D.C. 20549
USA
Dear Mr. Ferraro:

RE: Apex Wealth Enterprises Limited
Registration Statement on Form F-1:
File No. 333-108930

Apex Wealth Enterprises Limited (the "Company") hereby notifies the Securities and Exchange Commission of its decision to withdraw the above-referenced Form F-1 Registration Statement and requests that an order consenting to the withdrawal be entered effective immediately.

The Company filed the Registration Statement on Form F-1 with respect to shares of its Common Stock on September 18, 2003. Due to changes in market conditions, it has decided not to proceed with a blank check offering at this time. Accordingly, no shares of Common Stock have been or will be sold pursuant to the filed Registration Statement.

If you have any questions, please contact Simon Luk of Heller Ehrman White & McAuliffe at 001-852-2292-2000.

Very truly yours,

Apex Wealth Enterprises Limited

By: /s/ LI SZE TANG

Name: Li Sze Tang

Title: Chief Executive Officer and Chairman of the Board