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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

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Name: Li Sze Tang  
Title: Chief Executive Officer and Chairman of the Board