

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

DIVISION OF CORPORATION FINANCE

Mail Stop 3561

July 12, 2018

Via E-mail Koichi Ishizuka Chief Executive Officer Photozou Holdings, Inc. 4-30-4F, Yotsuya, Shinjuku-ku, Tokyo, 160-0004, Japan

Re: Photozou Holdings, Inc.

Form 8-K

Filed June 1, 2018 File No. 000-55806

Dear Mr. Ishizuka:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ David Link for

John Reynolds Assistant Director Office of Beverages, Apparel and Mining

cc: Thomas DeNunzio V Financial Group, LLC