

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

DIVISION OF CORPORATION FINANCE

September 18, 2023

Lee Choon Wooi Chief Executive Officer Starbox Group Holdings Ltd. VO2-03-07 Velocity Office 2, Lingkaran SV Sunway Velocity 55100 Kuala Lumpur Malaysia

Re: Starbox Group Holdings Ltd. Registration Statement on Form F-3 Filed September 12, 2023 File No. 333-274484

Dear Lee Choon Wooi:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Nicholas Nalbantian at 202-551-7470 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Ying Li