

January 28, 2021

Qing Pan
Chief Financial Officer
Noah Holdings Limited
Building 2
1687 Changyang Road
Shanghai 200090, People's Republic of China

Limited

fiscal year ended December 31, 2019

2020

Re: Noah Holdings

Form 20-F for the

Filed April 24,

File No. 001-34936

Dear Mr. Pan:

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,

Division of Corporation Finance

Office of Finance