

January 26, 2007

Mail Stop 4561

Daniel T. Phillips  
President and Chief Executive Officer  
FIRSTPLUS Financial Group, Inc.  
5100 North O'Connor Blvd., 6<sup>th</sup> Floor  
Irving, TX 75039

**Re: FIRSTPLUS Financial Group, Inc.**  
**Form 10-KSB for Fiscal Year Ended December 31, 2004**  
**Filed September 22, 2005**  
**File No. 000-27750**

Dear Mr. Phillips:

We have completed our review of your Form 10-KSB and related filings and have no further comments at this time.

Sincerely,

John P. Nolan  
Accounting Branch Chief