

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549-7010

Mail Stop 7010

November 21, 2006

Mr. Stephen M. Merrick Executive Vice-President and Chief Financial Officer CTI Industries Corporation 22160 North Pepper Road Barrington, Illinois 60010

> RE: Form 10-K for the Fiscal Year ended December 31, 2005 Forms 10-Q for the Fiscal Quarters ended March 31, 2006, June 30, 2006 and September 30, 2006 File No. 0-23115

Dear Mr. Merrick:

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

If you have any further questions regarding our review of your filings, please direct them to Gus Rodriguez, Staff Accountant, at (202) 551-3752 or, in his absence, to the undersigned at (202) 551-3689.

Sincerely,

Rufus Decker Branch Chief