

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

DIVISION OF CORPORATION FINANCE

March 31, 2015

<u>Via E-mail</u> Fan Haoran Chief Executive Officer Asia Properties, Inc. 119 Commercial St., Suite 190-115 Bellingham, WA 98225

> Re: Asia Properties, Inc. Current Report on Form 8-K Filed January 20, 2014 File No. 000-51048

Dear Mr. Haoran:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Tom Kluck

Tom Kluck Branch Chief