

December 7, 2007

Room 4561

Mr. Alex Genin  
Chief Executive Officer and  
Principal Financial Officer  
First Capital International, Inc.  
5120 Woodway, Suite 9024  
Houston, Texas 77056

**Re: First Capital International, Inc.  
Form 10-KSB for the Fiscal Year Ended December 31, 2006  
Filed April 16, 2007  
File no. 000-26271**

Dear Mr.Genin:

We have reviewed your response to our letter dated November 26, 2007 in connection with the above referenced filing and have the following comment. If indicated, we think you should revise your document in response to this comment. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In our comment, we may ask you to provide us with supplemental information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Form 10-KSB for the Fiscal Year Ended December 31, 2006

1. Please provide, in writing, a statement from the company acknowledging that:
  - the company is responsible for the adequacy and accuracy of the disclosure in the filing;
  - staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to 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.

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In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

\* \* \* \* \*

Please respond to this comment within 10 business days or tell us when you will provide us with a response. Please submit all correspondence and supplemental materials on EDGAR as required by Rule 101 of Regulation S-T. If you amend your filing(s), you may wish to provide us with marked copies of any amendment to expedite our review. Please furnish a cover letter that keys your response to our comment and provides any requested information. Detailed cover letters greatly facilitate our review. Please understand that we may have additional comments after reviewing any amendment and your response to our comment.

You may contact David Edgar at (202) 551-3459 or me at (202) 551-3451 if you have questions regarding the above comment.

Sincerely,

Mark Kronforst  
Accounting Branch Chief