



DIVISION OF  
CORPORATION FINANCE

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

March 10, 2010

Mail Stop 3010

*By U.S. Mail and facsimile to (203) 226-8645*

Mr. Nathan Lapkin, Chief Financial Officer  
Royal Invest International Corp.  
980 Post Road East, Second Floor  
Westport, Connecticut 06880

**RE: Royal Invest International Corp.  
File No. 000-27097  
Form 10-K for the year ended December 31, 2008  
Forms 10-Q for the quarters ended March 31, 2009, June 30, 2009 and  
September 30, 2009**

Dear Mr. Lapkin:

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

Sincerely,

Cicely LaMothe  
Branch Chief