



DIVISION OF  
CORPORATION FINANCE

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

January 19, 2011

Anthony J. Cataldo  
Chief Executive Officer  
Oxis International, Inc.  
468 N. Camden Dr., 2nd Floor  
Beverly Hills, CA 90210

**Re: Oxis International, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2009**  
**Filed March 30, 2010**  
**File No. 000-08092**

Dear Mr. Cataldo:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Jeffrey P. Riedler  
Assistant Director

cc: Istvan Benko (TroyGould PC)