



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-3561

Mail Stop 3561

April 29, 2010

Mr. David Powell
Chief Financial Officer
International Monetary Systems, Ltd.
16901 West Glendale Dr.
New Berlin, WI 53151

Re: International Monetary Systems, Ltd.
Item 4.01 Form 8-K
Filed April 22, 2010
File No. 0-30853

Dear Mr. Powell:

We have completed our review of your Form 8-K and have no further comments at this time.

Sincerely,

William H. Thompson
Accounting Branch Chief