

Mail Stop 6010

October 22, 2008

Thomas Striepe  
Chief Executive Officer  
Sangui Biotech International, Inc.  
Alfred Herrhausen Street 44  
Witten, Germany 58455

**Re: Sangui Biotech International, Inc.  
Preliminary Proxy Statement on Schedule 14A  
Filed September 5, 2008  
File No. 0-29233**

Dear Mr. Striepe:

We have completed our review of your preliminary proxy statement on Schedule 14A and have no further comments at this time.

Sincerely,

Jeffrey P. Riedler  
Assistant Director

cc: Chachas Law Group P.C.,  
Attn: J. Anthony Rolfe  
2445 Fifth Avenue, Suite 440  
San Diego, CA 92101