



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3561

January 5, 2010

Mr. James P. Walker, Jr.  
Chief Executive Officer  
Bidgive International, Inc.  
3538 Caruth Blvd., Suite 200  
Dallas, Texas 75225

**Re: Bidgive International, Inc.**  
**Form 10-K for the year ended December 31, 2008**  
**Filed April 16, 2009**  
**Form 10-Q for the quarter ended June 30, 2009**  
**Filed August 19, 2009**  
**File No. 0-49999**

Dear Mr. Walker:

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

Sincerely,

Jennifer Thompson  
Accounting Branch Chief