



DIVISION OF  
CORPORATION FINANCE

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

April 1, 2011

Mr. John Pougnet  
Chief Financial Officer  
BAZI International, Inc.  
1730 Blake Street, Suite 305  
Denver, Colorado 80202

**Re: BAZI International, Inc.**  
**Preliminary proxy statement filed March 23, 2011**  
**Supplemental response dated March 29, 2011**  
**File No. 001-32420**

Dear Mr. Pougnet:

We have completed our review of your preliminary proxy statement and related filings and have no further comments at this time.

Sincerely,

Jeffrey Riedler  
Assistant Director