



DIVISION OF
CORPORATION FINANCE
MAIL STOP 7010

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 F Street, N.E.
WASHINGTON, D.C. 20549-7010

February 7, 2006

Ms. Jacqueline Danforth, Chief Financial Officer
Capital Reserve Canada Ltd
1530 – 9 Avenue S.E.
Calgary, Alberta
CANADA T2G 0T7

Re: Capital Reserve Canada Ltd.
Form 20-F for Fiscal Year Ended December 31, 2004
Filed July 29, 2005
File No. 0-50339

Dear Ms. Danforth:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

April Sifford
Branch Chief