



DIVISION OF  
CORPORATION FINANCE  
MAIL STOP 7010

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

May 7, 2009

Mr. Steven Claussen, Chief Executive Officer  
Capital Reserve Canada Limited  
18104-102 Ave.  
Edmonton, Alberta CANADA T5S-1S2

**Re: Capital Reserve Canada Limited**  
**Form 20-F for Fiscal Year Ended December 31, 2007**  
**Filed July 7, 2007**  
**File No. 0-50339**

Dear Mr. Claussen:

We have completed our review of your Form 20-F and related filings and do not, at this time, have any further comments.

Sincerely,

Chris White  
Branch Chief