



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3030

October 21, 2015

Via E-mail

Mr. Gregory Sullivan  
President and Chief Executive Officer  
Security Devices International, Inc.  
4830 West Kennedy Blvd., Suite 600  
Tampa, Florida 33609

**Re: Security Devices International, Inc.**  
**Form 10-K for the Fiscal Year Ended November 30, 2014**  
**Filed February 24, 2015**  
**File No. 333-132456**

Dear Mr. Sullivan:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Martin James

Martin James  
Senior Assistant Chief Accountant  
Office of Electronics and Machinery