

Mail Stop 3561

October 17, 2006

Mr. Steve Anderson, Chief Executive Officer  
Surflect Holdings, Inc.  
1200-G Candelaria NE  
Albuquerque, NM 87112

**Re: Surflect Holdings, Inc. (formerly Windy Creek Developments, Inc)  
Item 4.01 Form 8-K  
Filed October 3, 2006  
File No. 333-132597**

Dear Mr. Anderson:

We have reviewed your filing and have the following comments. Where indicated, we think you should revise your document in response to these comments. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with more information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Please note that our review of this filing was limited to the matters pertaining to Item 4.01 of your report. At a later date, we may issue additional comments pertaining to the other matters described in the report.

1. We note your disclosure regarding changes in your certifying accountant. However, it is not clear when Windy Creek Development, Inc. (now Surflect Holdings Inc.) engaged REDW LLC as the principal accountant to audit their financial statements. You disclosed that you engaged REDW LLC as your new independent public accountant as of July 18, 2006 and that you did not consult REDW LLC during your two most recent fiscal years and the subsequent interim periods through June 2006. Given that the reverse merger became effective on September 27, 2006 and on the same date, you dismissed Moore & Associates,

Chartered as your independent accountant, please explain how you engaged REDW LLC before the consummation of the reverse merger and explain the nature of this engagement. As applicable, please disclose whether you consulted with REDW LLC during the period from June 2006 through the engagement date, July 18, 2006.

2. Please obtain and file an Exhibit 16 letter from the former accountants stating whether the former accountant agrees with your revised Item 304 disclosures, or the extent to which the accountant does not agree.

As appropriate, please amend your filing and respond to these comments within five business days or tell us when you will respond. You may wish to provide us with marked copies of the amendment to expedite our review. Please furnish a cover letter with your amendment that keys your responses to our comments and provides any requested information. Detailed cover letters greatly facilitate our review. Please submit all correspondence and supplemental materials on EDGAR as required by Rule 101 of Regulation S-T. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; 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.

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In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

If you have any questions, please call Raquel Howard, at (202) 551-3291.

Sincerely,

Raquel Howard  
Staff Accountant