



DIVISION OF  
CORPORATION FINANCE

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

November 13, 2012

Via Email

Mr. Jan E. Chason  
Chief Financial Officer  
Spring Creek Healthcare Systems, Inc.  
4400 Route 9 South, Suite 1000  
Freehold, NJ 07728

**Re: Spring Creek Healthcare Systems, Inc.  
Item 4.01 Form 8-K  
Filed October 26, 2012  
File No. 000-53339**

Dear Mr. Chason:

We have completed our review of your filing. 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 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. 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 the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/Craig Arakawa

Craig Arakawa  
Staff Accountant  
Office of Beverages, Apparel and  
Mining