



DIVISION OF
CORPORATION FINANCE

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

Mail Stop 7010

December 30, 2008

Via U.S. mail and facsimile

Nigel Wightman
Chairman and Chief Executive Officer
Titanium Asset Management Corp.
777 E. Wisconsin Avenue
Milwaukee, Wisconsin 53202-5310

**RE: Titanium Asset Management Corp.
Form 10-12G
Filed on: July 25, 2008
File No.: 000-53352**

**Titanium Asset Management Corp.
Form 10-Q for the Quarterly Period Ended September 30, 2008
Filed on: November 13, 2008
File No.: 000-53352**

Dear Mr. Wightman:

We have completed our review of the following:

- your Form 10; and
- Form 10-Q for the Quarterly Period Ended September 30, 2008.

We have no further comments at this time.

Nigel Wightman
Titanium Asset Management Corp.
December 30, 2008
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If you have any further questions regarding our review of your filings, please direct them to Ernest Greene, Staff Accountant, at (202) 551-3733 or Era Anagnosti, Staff Attorney, at (202) 551-3369 or, in her absence, to the undersigned at (202) 551-3767.

Sincerely,

Jennifer Hardy
Legal Branch Chief

cc: Barbara Lange, Esq. via Facsimile @ (415) 773-5759
Orrick, Herrington & Sutcliffe LLP