



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-3561

January 7, 2011

By U.S. Mail

Mr. Andrew Godfrey
President and Chairman
First Quantum Ventures, Inc.
2101 Vista Parkway, Suite 292
West Palm Beach, FL 33411

Re: Item 4.01 Form 8-K
Filed January 5, 2011
File No. 000-52759

Dear Mr. Godfrey:

We note you filed an Item 4.01 Form 8-K on January 5, 2010 in response to our comment letter dated December 30, 2010. However, it does not appear that you addressed our comment with respect to the re-audit of your financial statements.

Please be advised, as Larry O'Donnell, CPA, P.C. is no longer registered with the PCAOB, you may not include its audit reports in your filings with the Commission. If Larry O'Donnell, CPA, P.C. audited a year that you are required to include in your filings with the Commission, you should have a firm that is registered with the PCAOB re-audit that year.

Please tell us by filing a supplementary correspondence via EDGAR how you intend to address the required re-audit of the 2010 financial statements by no later than January 17, 2011.

You may contact Steve Lo at 202-551-3394 or Ryan Milne at 202-551-3688 if you have questions regarding this matter. Please contact me at 202-551-3871 with any other questions.

Sincerely,

Tia Jenkins
Senior Assistant Chief Accountant
Office of Beverages, Apparel and
Health Care Services