



DIVISION OF
CORPORATION FINANCE

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

May 4, 2011

Via Fax & U.S. Mail

Mr. Tom Gleason
President and Chief Executive Officer
Raptor Technology Group, Inc. (formerly Giddy-Up Productions, Inc.)
409-903 19th Avenue SW
Calgary, Alberta T2T 0H8

**Re: Raptor Technology Group, Inc. (formerly Giddy-Up Productions, Inc.)
Form 10-K for the year ended August 31, 2010
Filed November 16, 2010
File No. 0-53812**

Dear Mr. Gleason:

We have completed our review of your Form 10-K noted above and do not, at this time, have any further comments.

Sincerely,

Linda Cvrkel
Branch Chief