

Mail Stop 4561

November 10, 2009

***Via Mail and Facsimile to (702) 486-2452***

Carolyn Ellsworth  
Securities Administrator  
Securities Division, Nevada Secretary of State  
555 E. Washington Ave., Ste. 5200  
Las Vegas, NV 89101

**Re: Stone Harbor Investments, Inc.  
Registration Statement on Form S-1  
Filed October 14, 2009  
File No. 333-162469**

Dear Ms. Ellsworth:

Stone Harbor Investments, Inc., a company incorporated in your state, has filed a registration statement for its initial public offering. The registration statement can be viewed by conducting a search for the company's name at the following URL:  
<http://www.sec.gov/edgar/searchedgar/companysearch.html>.

Please contact Jan Woo at (202) 551-3453 with any information about this company or the proposed offering that you feel would be of interest to our agency.

Sincerely,

Katherine Wray  
Attorney-Advisor