



DIVISION OF
CORPORATION FINANCE

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

November 9, 2011

Via Email

Julian Spitari, Chairman and Chief Executive Officer
Imobolis, Inc.
8950 West Olympic Blvd. Suite 350
Beverly Hills, CA 90211

**Re: Imobolis, Inc.
Revised Preliminary Information Statement on Schedule 14C
Filed November 1, 2011
File No. 333-167077**

Dear Mr. Spitari:

We have reviewed your amended filing and your response letter and have the following comment.

Proposals 4 and 5, page 7

1. We note your response to prior comment 3 of our letter dated October 27, 2011 and we reissue our comment in part. Please furnish all of the information required by Item 7 of Schedule 14A in connection with the appointment of a new director. In particular, please address all of the applicable Regulation S-K item requirements including, but, not limited to the information required by Item 401 of Regulation S-K regarding the age and business experience of your directors and executive officer and the information required by Item 407 regarding corporate governance.

Please contact Daniel Leslie at (202) 551-3876 or me at (202) 551-3457 with any questions.

Sincerely,

/s/ Maryse Mills-Apenteng

Maryse Mills-Apenteng
Special Counsel

cc: Via Email
Ron Chew
3699 Wilshire Blvd #700
Los Angeles, CA 90010