

Mail Stop 3561

October 20, 2005

Mr. Michael J. Smith  
President, Chief Executive Officer and Secretary  
MFC Bancorp Ltd.  
Suite 803, 8th Floor  
Dina House  
Ruttonjee Centre  
11 Duddell Street  
Central Hong Kong, SAR, China

Re: MFC Bancorp Ltd.  
Form 20-F for the Fiscal Year Ended December 31, 2004  
Filed April 6, 2005  
File No. 1-04192

Dear Mr. Smith:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

Martin James  
Senior Assistant Chief Accountant