



DIVISION OF  
CORPORATION FINANCE

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

January 25, 2013

Via E-mail

W. Bennett Collett, Jr.  
Chief Executive Officer  
Florida Gaming Corporation  
3500 NW 37<sup>th</sup> Avenue  
Miami, FL 33142

**Re: Florida Gaming Corporation  
Preliminary Proxy Statement on Schedule 14A  
Filed December 7, 2012  
File No. 000-09099**

Dear Mr. Collett:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Max A. Webb

Max A. Webb  
Assistant Director

cc: Via E-mail  
Joshua M. O'Bryan  
Frost Brown Todd LLC