



January 16, 2014

**VIA EMAIL AND MAIL**

United States Securities and Exchange Commission  
Division of Corporation Finance  
Office of Information Technology, Filer Support  
100 F Street, N.E.  
Washington, D.C. 20549  
Attention: Mr. Larry Spirgel  
Mr. Gregory Dundas

Re: Strategic Global Investments, Inc.  
Offering Statement on Form 1-A  
Filed November 5, 2013  
File No. 024-10371

**Acceleration Request**

Requested Date: January 17, 2014  
Requested Time: 12:00PM Eastern Time

Gentlemen:

Strategic Global Investments, Inc. (the "**Company**") hereby requests that the Securities and Exchange Commission (the "**Commission**") take appropriate action to declare the above-captioned Offering Statement on Form 1-A qualified at the "Requested Date" and "Requested Time" set forth above or as soon thereafter as practicable.

The Company hereby authorizes Warren J. Archer, who is an attorney with the Company's outside legal counsel, Morella & Associates, to orally modify or withdraw this request for acceleration.

The Company hereby acknowledges that:

- should the Commission or the staff of the Commission, acting pursuant to delegated authority, declare the filing qualified, it does not foreclose the Commission from taking any action with respect to the filing;

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- the action of the Commission or the staff, acting pursuant to delegated authority, in declaring the filing qualified, does not relieve the Company from its full responsibility for the adequacy and accuracy of the disclosure in the filing; and
- the Company may not assert the staff comments and the declaration of qualification as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

The Company requests that it be notified of such qualification by a telephone call to Warren Archer at (412) 369-9696 or email to him at: [wjarcher@morellalaw.com](mailto:wjarcher@morellalaw.com).

Very truly yours,

**STRATEGIC GLOBAL INVESTMENTS, INC.**

By: Andrew T. Fellner  
Andrew T. Fellner  
President and Chief Executive Officer