



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

DIVISION OF
CORPORATION FINANCE

October 15, 2019

Danfeng Xu
Treasurer and Controller
Santa Fe Financial Corporation
12121 Wilshire Boulevard
Suite 610
Los Angeles, CA 90025

Re: Santa Fe Financial Corporation
Form 10-K for the Fiscal Year Ended June 30, 2019
Filed August 30, 2019
File No. 000-06877

Dear Ms. Xu:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Real Estate & Construction