

July 6, 2006

Mail Stop 4561

VIA U.S. MAIL AND FAX 1-503-721-6501

Mr. R. Scott Stevenson  
Chief Financial Officer  
Fog Cutter Capital Group, Inc. and Subsidiaries  
1410 SW Jefferson Street  
Portland, OR 97201

**RE: Fog Cutter Capital Group, Inc. and Subsidiaries  
Form 10-K for the year ended December 31, 2005  
File no. 0-23911**

Dear Mr. Stevenson:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Steven Jacobs  
Branch Chief