



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

DIVISION OF  
CORPORATION FINANCE

July 6, 2023

Jan Loeb  
Executive Chairman  
NovelStem International Corp.  
2255 Glades Road  
Suite 221A  
Boca Raton, FL 33431

**Re: NovelStem International Corp.**  
**Registration Statement on Form 10-12G**  
**Filed August 2, 2022**  
**File No. 000-22908**

Dear Jan Loeb:

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 Trade & Services

cc: Morris DeFeo